IRMA STANDARD V2.0
2nd DRAFT VERSION

# Requirement-by-requirement Text Comparison Between IRMA Standard V1.0 (2018) and 2nd DRAFT V2.0 (2025)

July 2025

## HOW TO READ THESE TABLES

These tables include the requirements only. They do not include notes, background, annexes, or charts.

In the column with the content of the 2nd DRAFT V2.0, all **substantial changes** compared to the IRMA Standard V1.0 (2018) version are highlighted in purple.

New optional requirements proposed (see more about IRMA+ in the full DRAFT standard) are in blue.

Note: In case of discrepancy between these tables and the official 2nd DRAFT, the draft version is authoritative.

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# PRINCIPLE 1: BUSINESS INTEGRITY

## Chapter 1.1 Legal Compliance and Contractor Oversight

| IRMA Standard V1.0 - JUNE 2018 | | | 2nd DRAFT - JULY 2025 | | | Comment |
|---|---|---|---|---|---|---|
| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **1.1** | | **Legal Compliance** | **1.1** | | **Legal Compliance and Contractor Oversight** | *Updated to highlight importance of Contractor Oversight in this Chapter* |
| ***1.1.1*** | | ***Compliance with Host Country Laws*** | ***1.1.1*** | | ***Mapping and Monitoring*** | *Updated to be consistent with the new approach taken.* |
| 1.1.1.1 | Critical | The operating company shall comply with all applicable host country laws in relation to the mining project. | 1.1.1.1 | | The ENTITY has identified and mapped the legal and regulatory requirements applicable to the site and its associated facilities as follows:<br>a. Competent professionals have identified and documented all the laws, rules and regulations , across all relevant jurisdictions , that are applicable to the site and its associated facilities ;<br>b. Competent professionals have identified and documented all regulatory and legal actions, their statuses and implications, across all relevant jurisdictions, related to the site and its associated facilities; and<br>c. Competent professionals have defined the criteria used to identify levels of significance of legal and regulatory non-compliances and corresponding response plans. | *Former requirement 1.1.1.1 proved to be very challenging to assess and audit correctly. These new requirements combine 1.1.1.1 and 1.1.5.1 (re. documentation), with most sub-requirements being new. These new aspects were needed to make the original intent auditable and comparable across companies and jurisdictions.* |
| 1.1.5.1 | | The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard. | | | | |
| 1.1.1.1 | Critical | The operating company shall comply with all applicable host country laws in relation to the mining project. | 1.1.1.2 | | The ENTITY has a system in place to maintain the site and its associated facilities in legal and regulatory compliance through:<br>a. Maintaining the project/operation, including associated facilities, in legal and regulatory compliance, across all relevant jurisdictions ;<br>b. Monitoring and documenting, on an ongoing basis, the status of compliance with all applicable laws, rules, and regulations, and with other enforceable legal obligations or requirements; and<br>c. Assigning accountability for this monitoring and compliance to a member of top management of the ENTITY. | |
| 1.1.5.1 | | The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard. | | | | |
| | | | 1.1.1.3 | *IRMA+* | *The criteria used to identify levels of significance of legal and regulatory non-compliances that may negatively impact stakeholders or rights holders are defined in collaboration with them (see Chapter 1.2- Community and Stakeholder Engagement).* | *This is a new **OPTIONAL** requirement, to include stakeholders in the definition of the criteria used to identify levels of significance of legal and regulatory non-compliances. This goes above and beyond known best practice so far.* |
| ***1.1.2*** | | ***Compliance with Most Protective Requirements*** | | | ~~***Compliance with Most Protective Requirements***~~ | |

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| 1.1.2.1 | | The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law. | | | ~~The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.~~ | *This Section and associated requirement are deleted, as demonstrating conformity with all IRMA requirements is the overarching objective of the Standard itself.* |
| ***1.1.3*** | | ***Response to Non-Compliance*** | ***1.1.2*** | | ***Response to Non-Compliance*** | |
| 1.1.3.1 | | If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring. | 1.1.2.1 | Critical | The ENTITY has a system in place to respond to non-compliances that ensures that:<br>a. If non-compliance with an applicable law, rule, regulation, or legal action occurs, its level of significance is identified;<br>b.For serious or continuing non-compliances (or equivalent), root-cause analysis for the non-compliance is undertaken; and<br>c. Timely and effective action is taken to address and correct all legal and regulatory non-compliances; and<br>d. Measures are implemented to prevent recurrence of similar non-compliances . | *a. and b. are new. This requirement is made critical, as non-conformity could result in a legal breach and/or immediate harm (this maintains the "criticality" of former 1.1.1.1 whose intent was to address these situations)* |
| ***1.1.4*** | | ***Contractor Compliance*** | ***1.1.3*** | | ***Contractor Oversight and Compliance*** | *Name expanded to be consistent with the more detailed and auditable approach* |
| 1.1.4.1 | | The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA Standard by contractors engaged in activities relevant to the mining project. | 1.1.3.1 | | The ENTITY has a system in place to verify the competency, skills, and capacity of its contractors , through:<br>a.Maintaining basic documentation on all contractors associated with the project/operation and associated facilities ;<br>b.Verifying the competency, skills, and capacity of all contracting firms ; and<br>c.Verifying the competency, skills, and capacity of all dependent and independent individual contractors . | *The original requirement proved to be extremely vague and generic, and therefore hard to audit and compare in a robust and consistent way, despite additional guidance. The original intent of taking "appropriate steps to ensure compliance with the IRMA Standard by contractors" has been articulated through 3 requirements, that use the original guidance and strengthen clarity and auditability, while drawing a clear and gradual continuous improvement journey.* |
| | | | 1.1.3.2 | | The ENTITY has a system in place to hold all contractors to the same legal and regulatory compliance standards as the ENTITY, through:<br>a. Informing all contractors that compliance with all applicable laws, rules, and regulations is required;<br>b. As necessary, providing them with the information and training material necessary to ensure such compliance;<br>c. Defining in contractual arrangements the consequences of non-compliance ;<br>d. Performing oversight activities to know if the contractors are ensuring compliance with all applicable laws, rules, and regulations;<br>e. Documenting all contractors' non-compliances with applicable laws, rules, and regulations, and identifying their levels of significance (accordingly to the ENTITY's criteria, see 1.1.1.1.c); and<br>f. Addressing all non-compliances by working with contractors to ensure that timely and effective action is taken to address and correct all legal and regulatory non-compliances, and measures are implemented to prevent recurrence of similar non-compliances . | |

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| | | | 1.1.3.3 | | The ENTITY has a system in place to hold all contractors to the same socio-environmental performance standards as the ENTITY, as articulated in the IRMA Standard, through:<br>a. Informing all contractors that conformity with relevant IRMA Standard requirements is expected;<br>b. As necessary, providing them with the information and training material necessary to ensure such conformity;<br>c. Performing oversight activities to know if the contractors are ensuring conformity with relevant IRMA Standard requirements;<br>d. Defining the criteria used to identify levels of significance of non-conformities with relevant IRMA Standard requirements (e.g. serious, continuing, or otherwise) and corresponding response plans;<br>e. Documenting all contractors' non-conformities with relevant IRMA Standard requirements, and identifying their levels of significance; and<br>f. Addressing all contractors' non-conformities with relevant IRMA Standard requirements by working with contractors to ensure that timely and effective action is taken to address and correct them, and measures are implemented to prevent recurrence of similar non-conformities. | |
| ***1.1.5*** | | ***Record-Keeping and Disclosure*** | ***1.1.4*** | | ***Information-Sharing and Public Reporting*** | *Emphasized the new focus on information-sharing and public reporting; Section name consistent with other Chapters.* |
| 1.1.5.2 | | Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors, and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies. | 1.1.4.1 | | Annually, the ENTITY makes publicly accessible an updated report of, and maintains publicly accessible all previous versions of reports of :<br>a. The total number of non-compliances with applicable laws, rules, and regulations during its latest reporting period;<br>b. A breakdown of this total by: 1) instances for which fines were incurred; 2) instances for which non-monetary sanctions were incurred; and 3) instances for which no fines or sanctions were incurred ;<br>c. The total number and the monetary value of fines for instances of non-compliance applicable with applicable laws, rules, and regulations that were paid;<br>d. A breakdown of this total by: 1) fines for instances of non-compliance with applicable laws, rules, and regulations that occurred in its latest reporting period; and 2) fines for instances of non-compliance with laws and regulations that occurred in its previous reporting periods; and<br>e. A description of all serious and all continuous (or equivalent) non-compliance events, ongoing and final remedies, together with a description of how it has determined the levels of significance of non-compliances. | *Requirement updated to establish public reporting by default, rather than limited disclosure to auditors or "upon request". The latter proved to be difficult to assess and audit in a robust and consistent manner. Intent of the requirement maintained* |
| 1.1.5.3 | | Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available. | | | | |

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| 1.1.5.4 | | Where the operating company claims that records or documentation contains confidential business information, it shall:<br><br>a. Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and<br><br>b. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information. | 1.1.4.2 | | Where the ENTITY claims that records or documentation contain confidential business information:<br>a.It publicly reports a general description of the confidential material and an explanation of the reasons for classifying the information as confidential;<br>b.If a part of a document is confidential, only the confidential part is redacted, allowing for the public reporting of non-confidential information; and<br>c.Where records or documents associated with the project/operation are related to a pending legal action, the existence of the legal action and the alleged regulatory non-compliance issues are disclosed, but detailed information may be treated as confidential business information. | *Requirement updated to include public reporting, rather than limited disclosure to auditors.*<br><br>*c. is added to specifically address pending legal actions.* |
| | | | *1.1.4.3* | *IRMA+* | *Annually, the ENTITY publicly reports the same level of information and disaggregation required under 1.1.4.1. for all its contractors' legal and regulatory non-compliances, as well as their non-conformities with relevant IRMA Standard requirements.* | *This is a new OPTIONAL requirement, to expand reporting requirements to contractors' non-compliances and non-conformities with the IRMA Standard. This goes above and beyond known best practice so far.* |

# Chapter 1.2 Community and Stakeholder Engagement

| IRMA Standard V1.0 - JUNE 2018 | | | 2nd DRAFT - JULY 2025 | | | Comment |
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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **1.2** | | **Community and Stakeholder Engagement** | **1.2** | | **Community and Stakeholder Engagement** | |
| ***1.2.1*** | | ***Planning and Designing Stakeholder Engagement Processes*** | ***1.2.1*** | | ***Stakeholder Mapping and Analysis*** | |
| 1.2.1.1 | | The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's mining-related activities. | 1.2.1.1 | | A process has been conducted and documented by competent professionals to identify and map all affected and potentially-affected relevant rights holders and stakeholders (referred to as "affected rights-holders and stakeholders" throughout the Standard), including:<br>a. The range of groups and individuals, including community members, rights-holders, representative organizations and institutions, and others, who are or may be directly affected by the site and its associated facilities, including those who may be opposed to the Entity's activities;<br>b. Those who are or may be indirectly affected too;<br>c. Potentially underserved and/or marginalized people for whom special outreach may be necessary ;<br>d. Whether Indigenous Peoples may be affected or potentially-affected by the project/operation, directly and/or indirectly;<br>e. Whether there is more than one distinct group of Indigenous Peoples ;<br>f. Whether Artisanal and/or Small-scale Mining (ASM) activities are occurring in the project/operation's area of influence , and of which form/s ; and<br>g. Whether any group or individual identified present sensory disabilities and/or sensory impairment that require specific accessibility measures to ensure meaningful access to communication and information-sharing .<br>h. Whether there are other relevant stakeholders who are not directly or indirectly affected by the project/operation but are interested in being engaged and having access to information. | *a. and b. were 1.2.1.1*<br><br>*c. was covered in Guidance*<br><br>*d. and e. were required in the FPIC Chapter*<br><br>*f. was implicitly required in 3.6.1.1*<br><br>*g. is new*<br><br>*h. was included in 1.2.1.1* |

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| 1.2.1.4 | | The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or mitigate community conflicts that might otherwise occur as a result of company engagement processes. | 1.2.1.2 | | A process has been conducted and documented by competent professionals to analyze community and stakeholder dynamics, and their implications for the ENTITY's engagement strategy. This process:<br>a. Has analyzed the relative interests and influence of each category/group of affected rights-holders and stakeholders with regard to the site and its associated facilities;<br>b. Has analyzed gendered roles and power dynamics within households and communities;<br>c. Has analyzed the implications of these relative interests, influence, gendred roles, and power dynamics for inclusive engagement; and<br>d. Included evaluation of pre-existing community dynamics , to understand if other natural resource-related projects/operations have created oppositions, tensions, and/or divisions, and if the ENTITY's activities may create, or has created, intra-community, inter-community or interpersonal tensions and/or divisions that warrant special engagement strategies. | *Sub-requirements developed, based on existing Guidance, to enhance clarity and auditability.*<br><br>*Analysis of gendered roles is new* |
| | | | ***1.2.2*** | | ***Engagement Plan*** | *New Section, to clarify sequence and structure* |
| 1.2.1.2 | | A stakeholder engagement plan scaled to the mining project's risks and impacts and stage of development shall be developed, implemented and updated as necessary. | 1.2.2.1 | | The ENTITY has a stakeholder engagement plan in place, developed by competent professionals, to frame the ENTITY's engagement with stakeholders. The plan:<br>a.Is informed by initial engagement with community representatives or other key stakeholders;<br>b. Identifies a timetable of engagement activities, and the purposes or goals for each engagement;<br>c. Identifies how engagements will capture input from a diversity of affected rights-holders and stakeholders;<br>d. It includes specific measures to facilitate inclusion of people of different genders, ages, ethnicities, and sensory issues; and<br>e. It includes specific measures to facilitate inclusion of any potentially underserved and/or marginalized people. | *Former 1.2.1.2 combined development, implementation, and update of the plan. These have been split between multiple requirements across relevant Sections*<br><br>*(4 requirements are necessary to rigorously assess the 'update' aspect that was required in former 1.2.1.2; see new Sections 1.2.6 and 1.2.7).* |
| 1.2.1.3 | | The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups). | | | | |
| 1.2.1.2 | | A stakeholder engagement plan scaled to the mining project's risks and impacts and stage of development shall be developed, implemented and updated as necessary. | 1.2.2.2 | | The stakeholder engagement plan:<br>a.Identifies how engagement processes will avoid or minimize conflicts within and between stakeholders and/or communities that are being engaged;<br>b.Identifies how monitoring and evaluation of effectiveness of stakeholder engagement will occur (as per Section 1.2.6); and<br>c.Includes documentation of a budget and staff responsibilities for effectively implementing the various engagement activities. | *New requirement that adds more clarity on what stakeholder engagements plans need to include (former 1.2.1.2 did not specify).* |
| 1.2.1.3 | | The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups). | | | | |
| ***1.2.4*** | | ***Communications and Access to Information*** | ***1.2.3*** | | ***Processes for Sharing Information*** | *Name updated to align with new approach proposed* |

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| 1.2.4.1 | | Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information. | 1.2.3.1 | | Building on the stakeholder mapping and analysis, the stakeholder engagement plan that is in place (required in 1.2.2) identifies, in collaboration with affected rights holders and stakeholders, how, when and in what formats relevant information will be shared with them, to ensure it occurs:<br>a. In a manner that is deemed meaningful, usable, and comparable by them, including to people who present sensory disabilities and/or sensory impairment ;<br>b. In a manner that is deemed culturally appropriate and easily accessible by them; and<br>c. In a manner that is deemed timely by them. When information cannot be shared in a timely manner, the ENTITY systematically provides affected rights holders and stakeholders with a documented justification or explanation for the delay. | *Standard-wide change relating to need for information sharing processes rather than relying on stakeholder requests.*<br><br>*Language changed to no longer reference requests relating to information on IRMA standard performance, as this specificity would not be appropriate for an over-arching policy on access to information.*<br><br>*a. is NEW*<br>*b. is aligned with 1.2.4.3*<br>*c. provides additional details to specify that delays (not only failure) in delivering information must be explained* |
| 1.2.4.3 | | Communications shall be carried out and information shall be provided to stakeholders in a timely manner, and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders | | | | |
| 1.2.4.4 | | If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information. | | | | |
| 1.2.4.1 | | Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information. | 1.2.3.2 | | The stakeholder engagement plan that is in place (required in 1.2.2) ensures that:<br>a. Any request from affected rights holders and stakeholders to obtain information that relates to the site's performance against the IRMA Standard will be met in a timely and effective manner ;<br>b. If requests are challenging to fulfill because of the large volume of information requested, the ENTITY will at least provide affected rights holders and stakeholders with summaries of requested information and a documented justification or explanation for why information is not being provided in full or according to the preferred timeline of the stakeholder ; and<br>c. If a request entails the sharing of document(s) that contain some confidential business information, or information that would violate applicable data privacy or data security laws, the ENTITY will redact only the confidential information, allowing for the release of all the non-confidential information. | *Specifies that the content of former 1.2.4.2 (and part of 1.2.4.1) (and guidance) should be included as part of the stakeholder engagement plan.* |
| 1.2.4.2 | | If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested. | | | | |
| ***1.2.2*** | | ***Engagement Processes*** | ***1.2.4*** | | ***Implementation of Stakeholder Engagement Processes*** | |
| 1.2.2.1 | | Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning) | 1.2.4.1 | Critical | The ENTITY has a system in place to foster two-way dialogue and meaningful stakeholder engagement, conducted by competent professionals. This system includes a process (or processes) to:<br>a.Provide stakeholders with opportunities to contribute to engagement agendas and add topics of concern into engagement planning;<br>b.Provide relevant information to stakeholders, including advance notice of proposed activities, in accordance with 1.2.3.2; and | *[Former 1.2.2.1 removed; reference to temporal aspect of engagement now included in 1.2.4.3.c]*<br><br>*1.2.4.1 made critical as derived from former critical requirement 1.2.2.2* |

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| | | | | | c.Engage stakeholders in a manner that is free from manipulation, interference, coercion, or intimidation. | *a. added to allow stakeholders to shape agendas*<br>*b. was adjusted to add more clarity on what types of information must be provided in advance* |
| 1.2.2.2 | Critical | The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:<br><br>a. Providing relevant information to stakeholders in a timely manner;<br>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;<br>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;<br>d. Soliciting feedback from stakeholders on issues relevant to them; and<br>e. Providing stakeholders with feedback on how the company has taken their input into account. | 1.2.4.2 | | This system also includes a process (or processes) to:<br>a. Clearly define decision-making structures and authorities amongst both ENTITY and affected rights-holders and stakeholders on key topics;<br>b. Ensure participation of representatives of affected rights-holders and stakeholders if consultations with them indicate that this as an expectation;<br>c. Engage and collaborate with a broad spectrum of affected rights-holders and stakeholders representing a diversity in genders, ages, ethnicities, and any potentially underserved and/or marginalized people ;<br>d. Regularly solicit feedback from affected rights-holders and stakeholders on issues relevant to them;<br>e. Include participation by site management and subject-matter experts when addressing concerns of significance to affected rights-holders and stakeholders; and<br>f. Engage affected rights-holders and stakeholders on an ongoing basis, from the earliest possible stage , and throughout the project/operation life cycle. | *Derived from former critical requirement 1.2.2.2 and requirement 1.2.2.4. The critical nature is only kept for new 1.2.4.1.*<br><br>*a. is new*<br><br>*c. 'diversity of ages and ethnicities' language added in alignment with rest of the Standard.*<br><br>*f. was adapted from former 1.2.2.1 but altered in recognition that existing mines cannot go back in time to conduct engagement prior to mine planning* |
| 1.2.2.4 | | Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives. | | | | |
| 1.2.2.3 | | The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project's environmental and social performance, and/or input to the company on issues of concern to stakeholders. | 1.2.4.3 | | At least one permanent stakeholder engagement mechanism is in place, as follows:<br>a. Is designed to facilitate the participation of affected rights-holders and stakeholders in regular and ongoing review of, input on, and collaborative decision-making on the environmental and social performance of the site and its associated facilities, as well as on other issues relevant to those affected rights-holders and stakeholders ;<br>b. Is designed in collaboration with affected rights-holders and stakeholders;<br>c. Is designed in collaboration with a diversity of members and representatives from affected communities ;<br>d. Includes specific mechanisms to facilitate the meaningful participation of potentially underserved and/or marginalized people; and<br>e. Ensures that relevant information is preemptively shared with affected rights-holders and stakeholders, in accordance with 1.2.3, for them to make input and contribute to collaborative decision-making in an informed manner. | *Based on 1.2.2.3, adding more details, and requiring at least one permanent mechanism to be established.*<br><br>*e. is new* |

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| 1.2.2.5 | | When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether or not such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community. | 1.2.4.4 | | When stakeholder engagement processes depend substantially on community representatives speaking for the community:<br>a. Efforts are made by the ENTITY to confirm whether or not such people represent the views and interests of diverse affected community members including underserved and/or marginalized people, and can be relied upon to reliably communicate relevant information between the community and the ENTITY ;<br>b. If either the representatives are not considered to represent the views of the community including underserved and/or marginalized people, or information from the engagement processes are not flowing back to the community, then the ENTITY implements additional engagement processes to enable more meaningful input from and information sharing with the broader community; and<br>c. These additional engagement processes identify how their effectiveness will be monitored and evaluated. | *c. added in alignment with addition of section 1.2.6 on M&E* |
| 1.2.2.6 | | The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders. | 1.2.4.5 | | Engagement processes are documented, including, at minimum:<br>a. Names of participants, unless anonymity requested, and their affiliations if relevant;<br>b. Input received from rights-holders and stakeholders, dates of all interactions, and feedback provided by the ENTITY to them; and<br>c. The documentation process includes safeguards to protect the security and privacy of collected personal data or characteristics of affected rights-holders and stakeholders. | *Clarity on privacy and security issues, as well as specific dates of interactions, added in line with guidance* |
| ***1.2.3*** | | ***Strengthening Capacity*** | ***1.2.5*** | | ***Strengthening Capacity to Engage*** | |
| 1.2.3.1 | | The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement. | 1.2.5.1 | | The ENTITY has a system in place to ensure that competent professionals conduct and document consultations with affected rights-holders and stakeholders, at least annually and more frequently if requested by them, to:<br>a. Assess their capacity to effectively engage with the ENTITY ;<br>b. Identify and understand potential barriers to participation in engagement processes that exist for different genders, ages, ethnicities, cultures, and linguistic groups; and<br>c. Identify and understand potential barriers to participation in engagement processes that exist for any potentially underserved and/or marginalized people . | *Requirement restructured to increase clarity and auditability.* |
| | | | 1.2.5.2 | | This system ensures that, where barriers to participation or capacity gaps are identified:<br>a. The ENTITY offers appropriate assistance to facilitate more effective engagement ;<br>b. The ENTITY and the relevant people or groups mutually agree on strategies to facilitate more effective engagement ; and<br>c. They also jointly agree on the implementation schedule/s, how implementation and effectiveness will be monitored and evaluated, and a financing plan to ensure that funding is available for effective implementation of these strategies. | *Requirement restructured to increase clarity and auditability.* |
| | | | ***1.2.6*** | | ***Monitoring and Evaluation*** | |

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| | | | 1.2.6.1 | | To monitor and evaluate the implementation and effectiveness of the stakeholder engagement plan, the ENTITY collaborates with affected rights-holders and stakeholders to, at least annually or more frequently if requested by them:<br>a. Track and document the implementation progress and effectiveness of stakeholder engagement, over successive time periods, against the timetable, goals and indicators defined as par 1.2.2.1 and 1.2.2.2;<br>b. Track and document the effectiveness of the strategies implemented to remove barriers and build capacity as per 1.2.5; and<br>c. The monitoring and evaluation process includes safeguards to protect the security and privacy of collected personal data or characteristics of stakeholders. | *This is a new section. These requirements add a consistency across the Standard. They are signaled with an 'eye icon' to be kept under close watch as they were not required in the Standard V1.0.* |
| | | | 1.2.6.2 | | The monitoring and evaluation process:<br>a. Encourages and facilitates joint tracking or joint fact-finding with affected rights-holders and stakeholders, in a manner that is inclusive of different genders, ages, and any potentially underserved and/or marginalized people;<br>b. Includes continuous stakeholder feedback on the design of engagement processes with regard to the scope of relevant issues covered; and<br>c. Includes continuous stakeholder feedback on the timeliness, accessibility, inclusiveness, and cultural appropriateness of information-sharing (see 1.2.3.1). | |
| | | | ***1.2.7*** | | ***Continuous Improvement*** | |
| 1.2.1.2 | | A stakeholder engagement plan scaled to the mining project's risks and impacts and stage of development shall be developed, implemented and updated as necessary. | 1.2.7.1 | | At least annually, or more frequently if requested by affected rights-holders and stakeholders, the ENTITY collaborates with them to:<br>a. Review the monitoring and evaluation results, informed by internal and external feedback, as per Section 1.2.6;<br>b. Review any engagement-related grievances and the functioning of its relevant grievance mechanism/s required in Section 1.4.3;<br>c. Review the ENTITY's effectiveness in engaging and collaborating with a broad spectrum of affected rights-holders and stakeholders representing a diversity in genders, ages, ethnicities, and members of any potentially underserved and/or marginalized people, as per 1.2.4.2;<br>d. Develop and implement time-bound corrective measures to update, if necessary , the stakeholder mapping and analysis in accordance with Section 1.2.2,<br>e. Develop and implement time-bound corrective measures to update, if necessary , the processes and criteria for sharing information in accordance with Section 1.2.3;<br>f. Develop and implement time-bound corrective measures to update, if necessary , how, the ENTITY engage with stakeholders in accordance with Sections 1.2.2 and 1.2.4; and<br>g. Develop and implement time-bound corrective measures to update, if necessary , the monitoring and evaluation processes, in accordance with Section 1.2.6. | *This is a new section. These requirements add a consistency across the Standard. They are signaled with an 'eye icon' to be kept under close watch as they were not required in the Standard V1.0.*<br><br>*d. to g. extend and clarify expectations of former 1.2.1.2 (and how to operationalize it).* |

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| | | | ***1.2.8*** | | ***Information-Sharing*** | *New Section, to be consistent with the rest of the Standard* |
| 1.2.2.7 | | The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes. | 1.2.8.1 | | The ENTITY proactively shares with affected rights-holders and stakeholders, in accordance with Section 1.2.3, and with due regard for the safety and data privacy of affected rights-holders and stakeholders:<br>a. Details about input received during stakeholder engagement processes;<br>b. Details about how stakeholder input and concerns were taken into account and addressed by the ENTITY; and<br>c. Details about how time-bound corrective measures required in 1.2.7.1 are effectively implemented. | *Sub-requirements developed, based on existing Guidance, to enhance clarity and auditability* |

# Chapter 1.3 Human Rights Due Diligence

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **1.3** | | **Human Rights Due Diligence and Compliance** | **1.3** | | **Human Rights Due Diligence** | |
| ***1.3.1*** | | ***Policy Commitment*** | | | ***Formalized Policy*** | *Revised heading* |
| 1.3.1.1 | Critical | The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights | 1.3.1.1 | | The ENTITY has a formal policy in place that commits to respect all internationally recognized human rights , in accordance with the UN Guiding Principles on Business and Human Rights:<br>a. The policy sets clear expectations that are in line with the UN Guiding Principles on Business and Human Rights regarding personnel, contractors, and other relevant parties linked to the project/operation;<br>b. The policy is approved at the top management level of the ENTITY;<br>c. The policy is proactively communicated to personnel, contractors, and other relevant parties linked to the project/operation;<br>d. The policy is publicly accessible;<br>e. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the project/operation. | *a and b. is aligned with former 1.3.1.1 and 1.3.1.2.c.*<br><br>*c. to e. is from former 1.3.1.2.*<br><br>*f. is new. Added to ensure adequate resourcing, in alignment with other chapters' policy requirements.* |
| 1.3.1.2 | | The policy shall:<br><br>a. Be approved at the most senior level of the company;<br><br>b. Be informed by relevant internal and/or external expertise;<br><br>c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project; | | | | |

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| | | d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders;<br><br>e. Be reflected in the mining project's operational policies and procedures. | 1.3.1.2 | | With regard to Rights Defenders, the ENTITY has a formal policy in place that:<br>a. Commits to respect the rights and protections accorded to human rights, land, environmental, and labor rights defenders (hereafter referred to as "rights defenders") in its area of influence ;<br>b. Publicly recognizes the positive role that rights defenders play, and commits to zero tolerance towards threats, attacks and reprisals against them;<br>c. Sets clear expectations for how personnel, contractors, and other relevant parties linked to the project/operation shall respect the rights and protections accorded to rights defenders;<br>d. Is approved at the top management level of the ENTITY;<br>e. Is proactively communicated to personnel, contractors, and other relevant parties linked to the project/operation; and<br>f. Is publicly accessible. | *b. is a new subrequirement in this context; however, draws on similar requirements in Chapter 1.6 (Grievances) - therefore this does not require additional action by the entity.*<br><br>*c. is aligned with former 1.3.1.2.c.*<br><br>*d. to f. is from former 1.3.1.2.*<br><br>*(Note: Removed the element in former 1.3.1.2 that stated that the policy would be reflected in the project/operation's policies and procedures. The rest of the chapter serves to integrate human rights responsibility expectations at the site level, and so this element is redundant)* |
| | | | **1.3.2** | | ***Scoping*** | *New heading* |
| | | | 1.3.2.1 | | A scoping process is undertaken by competent professionals, at the level of the project/operation, to analyze the human rights context applicable to the ENTITY. This process includes:<br>a. An analysis of the current human rights context in the country and project/operation area, including human rights impacts that have already occurred in relation to past and current mining-related activities;<br>b. An overview of relevant human rights laws, regulations, and norms; and<br>c. An environmental dimension through the mapping of key spatial data layers related to pollution, climate change, and biodiversity loss. | *This is new. No scoping requirements existed in the 2018 Standard; added for consistency with other chapters and to address a gap where no scoping preceeded the risk assessment in former 1.3.2 (current 1.3.3.)* |

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| | | | 1.3.2.2 | | A scoping process is undertaken by competent professionals, at the level of the project/operation, to identify and map the rights of all potentially affected stakeholders. This process:<br>a. Builds on the stakeholder scoping process required in Section 1.2.1, to identify and map all their duly reasoned claims regarding the use or ownership of land, territories, and resources in and around the project/operation's area of influence (as identified in Chapter 2.1);<br>b. Add to the map groups of rights holders dependent on land, water, air, climate, and biodiversity (as well as entitled to lands, territories, and resources) who, therefore, can potentially be adversely affected by the project/operation; and<br>c. Is informed by consultations with potentially affected rights holders, including different genders, ages, ethnicities, and any potentially underserved and/or marginalized people. | *Same as 1.3.1.2, above.* |
| | | | 1.3.2.3 | | Building on Chapter 1.2, a scoping process is undertaken by competent professionals, at the level of the project/operation, to specifically identify and map the rights of all Indigenous rights holders potentially affected by the project/operation. This process:<br>a. Builds on the stakeholder scoping process required in criterion 1.2.1, to identify and map all distinct groups of Indigenous Peoples whose traditionally owned, occupied, or otherwise used or acquired lands, territories, and resources have been or may be affected directly or indirectly by the ENTITY's mining-related activities;<br>b. Includes consultations with relevant Indigenous Peoples' organizations or bodies, if they exist, and external experts and credible independent sources of information to determine if there are any potentially affected Indigenous Peoples who have not been identified by the ENTITY; and<br>c. Includes consultations with relevant Indigenous Peoples' organizations or bodies, if they exist, and external experts and credible published sources to determine if there are any uncontacted Indigenous Peoples or in initial contact who may be present in the area of influence and/or affected by the project/operation. | *Moved the identification of affected Indigenous rights holders to this chapter / requirement, to ensure all entities systematically adopt this lens when identifying affected rights and rights holders.*<br><br>*Requirement does not require additional actions by entities as this was already required under Chapter 2.2.* |
| ***1.3.2*** | | ***Assessment of Human Rights Risks and Impacts*** | ***1.3.3*** | | ***Risk and Impact Assessment*** | *Revised heading* |

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| 1.3.2.1 | Critical | The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment. | | | | |
| 1.3.2.2 | | Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:<br><br>a. Follow a credible process/methodology;<br><br>b. Be carried out by competent professionals; and<br><br>c. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. | | | | |
| 1.3.2.3 | | As part of its assessment, the operating company shall document, at minimum:<br><br>a. The assessment methodology;<br><br>b. The current human rights context in the country and mining project area;<br><br>c. Relevant human rights laws and norms;<br><br>d. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk;<br><br>e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group;<br><br>f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. | 1.3.3.1 | Critical | Building on 1.3.2, a risk and impact assessment is carried out by competent professionals, at the level of the project/operation, to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts related to the project/operation and associated facilities. The assessment includes:<br>a. A comprehensive list of the direct, indirect and cumulative risks to, and impacts on, human rights related to the project/operation and associated facilities, informed by the review all the issues listed in Annex 1.3 and determination of their applicability;<br>b. An evaluation of the severity of each identified impacts, and of the likelihood for and potential severity of each identified risk;<br>c. An analysis of the potential differential risks to and impacts on the different categories or groups of rights-holders and a disaggregation of the results by such categories or groups, including: 1) People of different genders, ages, and ethnicities; 2) Rights Defenders; and 3) Any potentially underserved and/or marginalized people; and<br>c. Recommended measures that can be taken by the ENTITY to prevent all identified risks and impacts and, where prevention is not possible or not immediately possible, to mitigate and to remediate them. | *Components taken from former 1.3.2.1 - 1.3.2.3. Added Annex 1.3 to try to promote consistency and a comprehensive overview of human rights to be included in the assessment.*<br><br>*b. specifies what is meant by 'credible process / methodology' in former 1.3.2.2.a*<br><br>*c. adapted from former 1.3.2.3.e*<br><br>*d. adapted from former 1.3.2.3.f*<br><br>*Former requirement to include risks and impacts related to business relationships has been moved to Chapter 1.4 on Upstream and Downstream Sustainability Due Diligence.* |

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| 1.3.2.3 | | As part of its assessment, the operating company shall document, at minimum:<br><br>a. The assessment methodology;<br><br>b. The current human rights context in the country and mining project area;<br><br>c. Relevant human rights laws and norms;<br><br>d. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk;<br><br>e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group;<br><br>f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. | 1.3.3.2 | | This risk and impact assessment:<br>a. Is informed by relevant internal and/or external human rights expertise;<br>b. Incorporates analysis of credible independent reports and sources of information; and<br>c. Includes an explanation of the assessment methodology. | *a. is from former 1.3.2.2.c.*<br><br>*b. is adapted for more specificity from 1.3.2.2.a.*<br><br>*c. is from 1.3.2.3.a.* |
| 1.3.2.2 | | Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:<br><br>a. Follow a credible process/methodology;<br><br>b. Be carried out by competent professionals; and<br><br>c. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. | | | | |
| 3.4.1.1 | | The operating company shall conduct a screening analysis, based on evidence from credible sources, to determine whether or not the mining project is located in and/or sources minerals from a conflict-affected or high-risk area. | 1.3.3.3 | | This risk and impact assessment clearly identifies whether any of the ENTITY's activities may be the cause of, or may take place in an area with confirmed or suspected presence of:<br>a. Armed conflict, widespread violence, widespread human rights abuses or other risks of harm to people;<br>b. Political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, or widespread violations of national or international law; and<br>c. The ENTITY has a system in place to ensure that, if and whenever the human rights risk and impact assessment identifies any of the ENTITY's activities to be the cause of, or contribute to, or take place in an area with confirmed or suspected presence of, any form of such conflicts or high risks | *Requirement draws on several requirements formerly part of former Chapter 3.4 - moved here for consistency and consolidation of human rights risk assessment expectations.* |

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| 3.4.1.2 | | If a determination is made that the mining project is located in a conflicted-affected or high-risk area or it sources minerals from such areas, then the operating company shall undertake the additional due diligence steps outlined in the remainder of this chapter. | | | (as per sub-requirements a. and b), heightened due diligence is carried out by competent professionals in accordance with Chapter 1.5. | |
| 1.3.2.2 | | Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:<br><br>a. Follow a credible process/methodology;<br><br>b. Be carried out by competent professionals; and<br><br>c. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. | 1.3.3.4 | | This risk and impact assessment process is informed by consultations with affected rights-holders and stakeholders, as follows:<br>a. Consultations occur in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people;<br>b. The rights-holders and stakeholders who participate have opportunities to review and provide feedback, for a period of at least 60 days, on draft key issues, findings, and recommendations that are relevant to them;<br>c. They have opportunities to validate these key issues, findings and recommendations, before the ENTITY can consider the process finalized or completed ; and<br>d. Draft and final versions of relevant documents and information are shared with affected rights-holders and stakeholders, in a meaningful, accessible, and culturally appropriate way (as per Section 1.2.3), clearly showing how their feedback and input was taken into account. | *Reference to consultations adapted from former 1.3.2.2.c.*<br><br>*a. and b. are former 1.3.2.4.*<br><br>*c. and d. expand on 1.3.2.2.c, to add more specificity.* |
| 1.3.2.4 | | At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them, and shall be consulted to provide feedback on those findings. | | | | |
| 1.3.2.1 | Critical | The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment. | 1.3.3.5 | | Building on 1.3.3.1, when past or ongoing human rights impacts in relation to the project/operation have been identified, the Entity ensures that the following studies are carried out by competent professionals to inform the risk and impact assessment process:<br>a. Analysis of the root causes of those human rights impacts;<br>b. Evaluation of how those human rights impacts may be aggravated by the ENTITY’s current and future mining-related activities; and<br>c. Identification of whether measures have been taken to remedy those human rights impacts, and if so, whether remedies provided were satisfactory to affected rights holders. | *This is a new requirement, added to ensure explicit focus on past human rights impacts identification (previously implicit in former 1.3.2.1 reference to 'actual' human rights impacts)* |
| ***1.3.3*** | | ***Prevention, Mitigation and Remediation of Human Rights Impacts*** | ***1.3.4*** | | ***Prevention, Mitigation, and Remediation Plan*** | *Revised heading* |

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| 1.3.3.2 | | Responding to human rights risks related to the mining project:<br><br>a. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s).<br><br>b. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks.<br><br>c. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities. | 1.3.4.1 | Critical | Building on 1.3.3 and other relevant sources of information, a plan is developed and documented by competent professionals to prevent and mitigate all human rights risks and impacts identified. The plan:<br>a. Outlines the agreed specific measures to prevent and, where prevention is not possible or not immediately possible, to mitigate all potential human rights risks and actual human rights impacts;<br>b. Where it is necessary to prioritize measures to address actual and potential adverse human rights impacts, it first seeks to prevent and mitigate those that are most severe or where delayed response would make them irremediable ;<br>c. Includes qualitative and quantitative performance indicators (including gender- and/or rights holder-disaggregated indicators where appropriate), linked to adequate baseline data, to enable monitoring and evaluation of the effectiveness of measures over time;<br>d. Assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. Assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. Has clearly-defined timelines and an implementation schedule in place that specifies the expected outcomes for affected rights-holders and stakeholders;<br>g. Maintains estimates of human resources and budget required; and<br>h. Includes a financing plan in place, to ensure that funding is available for the effective implementation of the plan. | *This was added to make it clear that if risks or impacts come to light (either through the risk assessment or some other source, such as a grievance being filed) that the specified actions need to be incorporated into the management plan, and implemented.*<br><br>*Draws on components of former 1.3.3.2 (esp. re: mitigation hierarchy).*<br><br>*c. aligns with requirements in management plans in other chapters, to enable monitoring of effectiveness.*<br><br>*New critical requirement explicitly asking for a management plan (formerly incorporated implicitly into subsequent requirements referencing mitigation measures).*<br><br>*d. to h. added in part to align with the EU Battery Regulation and for consistency with other chapters concerning expectations for clear resourcing for management plans.* |

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| 1.3.3.2 | | Responding to human rights risks related to the mining project:<br><br>a. If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s).<br><br>b. If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks.<br><br>c. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities. | 1.3.4.2 | | To prevent human rights impacts, this plan ensures that:<br>a. Where the ENTITY may cause an adverse human rights impact, it takes the necessary measures to prevent the impact from occurring, including through halting or ceasing relevant activities if necessary;<br>b. Where the ENTITY may contribute to an adverse human rights impact, it takes the necessary measures to cease or prevent its contribution to the identified risk, and use its leverage to mitigate any remaining risk to the greatest extent possible. Leverage is considered to exist where the enterprise has the ability to effect change in the practices of an ENTITY that may cause a harm; and<br>c. Where the ENTITY identifies external human rights risks that are directly linked to its operations, products or services by its business relationship with another ENTITY, the ENTITY develops the appropriate action to take aimed at preventing the impact from occurring, based on its leverage over the business relationship concerned, how crucial the relationship is to the ENTITY, the severity and probability of occurrence of the risk, and whether terminating the relationship itself would have adverse human rights consequencess. | *Expands on components of former 1.3.3.2 to provide more clarity, and includes in the preamble to the subrequirements the purpose/goal of the requirement.*<br><br>*b. adds clarity to what is meant by 'leveraging'.* |

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| 1.3.3.3 | Critical | Responding to actual human rights impacts related to the mining project:<br><br>a. If the operating company determines that it has caused an actual human rights impact, the company shall:<br>i. Cease or change the activity responsible for the impact; and<br>ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders;<br><br>b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact;<br><br>c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and<br><br>d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships. | 1.3.4.3 | Critical | To mitigate adverse human rights impacts, this plan ensures that, whenever an actual human rights impact is identified:<br><br>a. Where the ENTITY causes the adverse human rights impact, measures to cease the impact, prevent any further impact, and mitigate and remediate harm in a timely manner, are developed 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 mechanism, mutually acceptable to affected rights holders;<br><br>b. Where the ENTITY does not bear the sole responsibility of the adverse human rights impact , it mitigates and remediates harm to the extent of its contribution, and uses its leverage to the greatest extent possible to influence other contributing parties to mitigate and remediate the remaining impacts. Leverage is considered to exist where the enterprise has the ability to effect change in the wrongful practices of an ENTITY that causes a harm ; and<br><br>c. Where they exist, the ENTITY cooperates with other legitimate processes such as judicial or state-based investigations or proceedings related to the human rights impact that the ENTITY caused, contributed to, or was linked to through its business relationships. | *Expands on components of former 1.3.3.3 to provide more clarity.*<br><br>*a. is from former 1.3.3.3.a.i and ii.*<br><br>*b. is from former 1.3.3.3.b and c (more detail added in endnotes). Adds clarity to what is meant by 'leveraging'.*<br><br>*c. is from former 1.3.3.3.d.* |
| | | | 1.3.4.4 | | The development of this plan is informed by consultations with potentially affected rights-holders, as follows:<br>a. Consultations occur in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people;<br>b. The rights-holders who participate have opportunities to review and provide feedback, for a period of at least 60 days, on draft prevention and mitigation measures, priority setting, and on draft qualitative and quantitative performance indicators that are relevant to them;<br>c. They have opportunities to validate these measures, priority setting, and qualitative and quantitative performance indicators, before the ENTITY can consider the process finalized or completed ; and<br>d. Draft and final versions of relevant documents and information are proactively shared with rights-holders, in a meaningful, accessible, and culturally appropriate way (as per Section 1.2.3), clearly showing how their feedback and input was taken into account. | *New requirement to align with other chapters concerning expectation of consultations on mitigation plans.* |

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| 1.3.3.1 | | Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights. | 1.3.4.5 | | Affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, have access to a grievance mechanism to raise, and seek resolution or remedy for, complaints and grievances specifically related to human rights, as follows:<br>a. A grievance mechanism through which affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, can raise, and seek resolution or remedy for, complaints and grievances specifically related to human rights, is in place;<br>b. This grievance mechanism is rights-compatible ;<br>c. Affected rights-holders and stakeholders have been informed about the existence and functioning of this grievance mechanism, as well as of other relevant mechanisms ;<br>d. If the operational-level grievance mechanism developed as per Chapter 1.6 (Complaints and Grievance Mechanism and Access to Remedy) is used as the mechanism to receive complaints and grievance specifically related to human rights, the Entity fully meets all requirements in Chapter 1.6; and<br>e. If a separate mechanism is created to handle only complaints and grievances related to human rights, it is established and managed in a manner that fully meets all requirements in Chapter 1.6. | *Adapted from former 1.3.3.1.*<br><br>*d. and e. are new to reflect new approach throughout the Standard (inc. explicit cross-reference with Chapter 1.6)* |
| ***1.3.4*** | | ***Monitoring*** | ***1.3.5*** | | ***Monitoring and Evaluation*** | *Revised heading* |
| 1.3.4.1 | | The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders. | 1.3.5.1 | | To monitor and evaluate the effectiveness of the plan, at least twice a year, the ENTITY:<br>a. Tracks and documents its performance, over successive time periods, against the criteria and indicators defined in 1.3.4.1 and validated as per 1.3.4.5;<br>b. Tracks and documents how the measures developed and implemented as per 1.3.4.2 and 1.3.4.3 are effectively preventing actual human rights impacts, and where prevention is not possible or not immediately possible, providing timely and adequate remediation to affected rights holders; and<br>c. Disaggregates the data according to gender- and/or rights-holder-specific indicators where appropriate. | *Expands upon M&E expectations outlined in former 1.3.4.1.*<br><br>*c. is new sub-requirement, aligned with enhanced gender focus Standard-wide* |

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| | | | 1.3.5.2 | | The monitoring and evaluation process:<br>a. Encourages and facilitates joint tracking or joint fact-finding with affected rights holders, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and/or marginalized people, as per Chapter 1.2;<br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected rights holders; and<br>c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of rights holders. | *Expands upon M&E expectations outlined in former 1.3.4.1.*<br><br>*c. is new sub-requirement, aligned with enhanced data security focus Standard-wide* |
| | | | ***1.3.6*** | | ***Continuous Improvement*** | *New section added for consistency with other chapters* |
| 1.3.4.1 | | The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders. | | | At least twice a year, but without undue delay after a significant change, the ENTITY:<br>a. Reviews human rights monitoring and evaluation results, informed by internal and external feedback, as per Section 1.3.5;<br>b. Reviews any human-rights-related grievances and the functioning of the relevant grievance mechanism/s required in 1.3.4.5 (see also Section 1.6.4);<br>c. Reviews is effectiveness in preventing, mitigating, and remediating human rights impacts, and informed by the monitoring and evaluation required in 1.3.5.1 and 1.3.5.2;<br>d. Develops and implements time-bound corrective measures to update, if necessary , its risk and impact assessment in accordance with Section 1.3.3;<br>e. Develops and implements time-bound corrective measures to update, if necessary , its plan to prevent, mitigate, and remediate human rights impacts in accordance with Section 1.3.4; and<br>f. Develops and implements time-bound corrective measures to update, if necessary , its human rights monitoring and evaluation processes in accordance with Section 1.3.5. | *Review of M&E results implicit in former 1.3.4.1 and 1.3.4.2 (as this review was indicated as the trigger for the external monitoring in 1.3.4.2).*<br><br>*d. to f. added for consistency with other chapters (in alignment with the Plan-Do-Check-Act cycle).* |
| 1.3.4.2 | | External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:<br><br>a. The company shall fund the external monitoring; and<br><br>b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. | 1.3.6.1 | | | |
| 1.3.4.2 | | External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:<br><br>a. The company shall fund the external monitoring; and<br><br>b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. | 1.3.6.2 | | If the monitoring and evaluation process required in 1.3.5, and/or the review process required in 1.3.6.1, and/or credible independent sources of information demonstrate that the ENTITY fails to effectively prevent, mitigate and/or remediate actual human rights impacts:<br>a. The ENTITY resorts to external monitoring of its human rights due diligence;<br>b. The ENTITY covers all costs associated with this external monitoring; and<br>c. The form of such monitoring, including selection of external monitors, is determined in collaboration with affected rights holders. | *Adapted from former 1.3.4.2.* |

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| ***1.3.5*** | | ***Reporting*** | ***1.3.7*** | | ***Information Sharing and Public Reporting*** | *Revised heading* |
| 1.3.1.2 | | The policy shall:<br><br>a. Be approved at the most senior level of the company;<br><br>b. Be informed by relevant internal and/or external expertise;<br><br>c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project;<br><br>d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders;<br><br>e. Be reflected in the mining project's operational policies and procedures. | 1.3.7.1 | | In addition to information-sharing required in 1.3.3.4 and 1.3.4.6, the ENTITY proactively shares with affected rights holders, in accordance with Section 1.2.3:<br>a. Its formalized human rights policies (see Section1.3.1);<br>b. The details and findings of its human rights scoping process (see Section1.3.2); and<br>c. The details and findings of its human rights monitoring and evaluation process (see Section 1.3.6). | *a. is from former 1.3.1.2.d.*<br><br>*b. incorporates intent of former 1.3.5.1 (public sharing of risks / impacts identified) but specifies that this needs to be shared with stakeholders, not just made public.*<br><br>*c. incorporates intent of former 1.3.5.1 (effectiveness of due diligence activities including actions taken) but specifies that this needs to be shared with stakeholders, not just made public.* |
| 1.3.5.1 | | The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts. | 1.3.7.2 | | 1.3.7.2 At least annually, and with due regard for people's safety, data privacy, and for security concerns, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. Its human rights risk and impact assessment, including an explanation of the assessment methodology and a list of the risks and impacts identified (see Section 1.3.3);<br>b. Its plan to prevent and mitigate human rights risks and impacts, including prioritization criteria and the measures taken to prevent, mitigate, and remediate risks and impacts (see Section 1.3.4);<br>c. The qualitative and quantitative performance indicators used to monitor and evaluate the effectiveness and appropriateness of its plan (defined in 1.3.4.1. and validated as per 1.3.4.4);<br>d. Key findings of the monitoring and evaluation process required in Section 1.3.5, and of the review process required in 1.3.6.1;<br>e. A summary of the measures developed and implemented as per 1.3.4.2 and 1.3.4.3 and the extent to which they effectively prevented actual human rights impacts, and where prevention was not possible or immediately possible, provided timely and adequate remediation to affected rights-holders; and<br>f. A list of the time-bound corrective measures identified as per 1.3.6.1 (see d. to f.). | *Incorporates components of and expands on former 1.3.5.1; asks that the documents themselves be made and maintained public (rather than simply reporting on them).*<br><br>*c. is a new sub-requirement (former 1.3.5.1 did not ask for M&E indicators to be public, but rather just implied the results of M&E should be in asking for public reporting on effectiveness)*<br><br>*d. to f. add further detail as to expectations for reporting and information sharing; incorporates components of and expands on former 1.3.5.1.* |

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| 1.3.5.2 | | If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations. | 1.3.7.3 | | If external monitoring is required per 1.3.6.<br>a. The ENTITY proactively shares with affected rights-holders and stakeholders, in accordance with Section 1.2.3, the details and findings of this external monitoring;<br>b. It also shares with them the time-bound corrective measures resulting from this external monitoring's findings and recommendations;<br>c. At least annually, and with due regard for people's safety, data privacy, and for security concerns, the ENTITY makes publicly accessible an updated version of, and maintains publicly accessible all previous versions of, a report on this external monitoring's findings and recommendations to improve the ENTITY's human rights due diligence ; and<br>d. This public annual report includes a list of time-bound corrective measures to improve the ENTITY's ability to effectively prevent, mitigate, and remediate human rights risks and impacts. | *Expanded version of former 1.3.5.2.* |
| 1.3.2.5 | | The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level. | | | | *Removed former 1.3.2.5 as it is now redundant due to explicit requirements asking for a management plan (1.3.4.1), and the plan being subject to continuous improvement (1.3.6).* |
| 1.3.5.3 | | Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may compromise safety or place any individual at risk of further victimization. | | | | *Deleted because it was more informative than an actual requirement and access to information is now covered in 1.3.7.* |

# Chapter 1.4 Upstream and Downstream Sustainability Due Diligence

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **1.3** | | **Human Rights Due Diligence and Compliance** | **1.4** | | **Upstream and Downstream Sustainability Due Diligence** | |
| ***1.3.1*** | | ***Policy Commitment*** | ***1.4.1*** | | ***Formalized Policy*** | |
| 1.3.1.1 | Critical | The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights | | | | |
| 1.3.1.2 | | The policy shall:<br><br>a. Be approved at the most senior level of the company;<br><br>b. Be informed by relevant internal and/or external expertise;<br><br>c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project;<br><br>d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders;<br><br>e. Be reflected in the mining project's operational policies and procedures. | 1.4.1.1 | | The ENTITY has a formal policy in place that:<br>a. Commits to ensure risk-based sustainability due diligence with respect to the operations carried out by its direct and indirect business partners, both upstream and downstream:<br>b. Contains a description of the ENTITY's approach, including in the long term, to upstream and downstream due diligence, to address actual and potential human rights, social and environmental risks and adverse impacts listed in Annex 1.4-A.<br>c. Is in line with the UN Guiding Principles on Business and Human Rights, and where applicable with the OECD Guidance ;<br>d. Contains a description of the measures taken to verify compliance with the Code of Conduct referred to in 1.4.2. and to extend that Code's application to all the ENTITY's business partners;<br>e. Is developed in prior consultation with the ENTITY's workers and their representatives;<br>f. Is approved at the top management level of the ENTITY;<br>g. Is proactively shared with personnel, contractors, suppliers, customers, direct and indirect business partners, and other relevant parties linked to the project/operation and the Entity's chain of activities ;<br>h. Is publicly accessible; and<br>i. The ENTITY has allocated financial and staffing resources to oversee and implement this policy at the level of the project/operation. | *b. and c. aligned with former 1.3.1.1 and 1.3.1.2.c with added details regarding the list of issues and rights to be considered (aligned with EU CSDDD)*<br><br>*d. and e. are new, to align with EU CSDDD*<br><br>*f. to h. are from former 1.3.1.2*<br><br>*i. was partly covered in 3.4.2.2 (though is now not limited to CAHRAs)* |
| 3.4.2.2 | | When operating in a conflict-affected or high-risk area, the operating company shall:<br>[...]<br>c. Assign authority and responsibility to senior staff with the necessary competence, knowledge and experience to oversee the conflict due diligence processes; [...] | | | | |
| | | | ***1.4.2*** | | ***Code of Conduct*** | *New section, to align with EU CSDDD language* |
| | | | 1.4.2.1 | | The ENTITY has a Code of Conduct (or equivalent) in place, developed by competent professionals, that describes the human rights, social, labor, and environmental rules and principles to be followed:<br>a.Throughout its own operations;<br>b.Throughout its direct and indirect upstream business relationships (suppliers); and<br>c.Throughout its direct and indirect downstream business relationships (customers, traders, distributors, intermediaries). | *This is new, to align with EU CSDDD* |

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| | | | 1.4.2.2 | IRMA+ | *This Code of Conduct clearly describes how the ENTITY will, where relevant:*<br>*a. Seek from its direct business partners contractual assurances that they will ensure compliance with the ENTITY's Code of Conduct and, as necessary, a prevention and/or corrective action plan;*<br>*b. These contractual assurances (a.) include establishing corresponding contractual assurances from their partners, to the extent that those partners' activities are part of the ENTITY's chain of activities;*<br>*c. Seek from its indirect business partners contractual assurances with a view to achieving compliance with the ENTITY's Code of Conduct and, as necessary, a prevention and/or corrective action plan ;*<br>*d. This Code of Conduct describes how the contractual assurances referred to in a. to c. will be accompanied by appropriate measures to verify compliance .* | *New OPTIONAL requirement to align with EU CSDDD* |
| ***1.3.2*** | | ***Assessment of Human Rights Risks and Impacts*** | ***1.4.3*** | | ***Scoping*** | |
| 1.3.2.1 | Critical | The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and **business relationships.** Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment. | 1.4.3.1 | Critical | A scoping process is undertaken by competent professionals to analyze and understand the ENTITY's chain of activities. This process includes:<br>a. A mapping of the ENTITY's direct business partners;<br>b. A mapping of the ENTITY's indirect business partners; and<br>c. Identification of general areas where human rights, social, and environmental adverse impacts listed in Annex 1.4-A are most likely to occur and to be most severe. | *a. and b. draw from former 1.3.2.1, to ensure "significant changes in business relationships" can be identified*<br><br>*c. is new* |
| ***3.6.1*** | | ***Understand the ASM Context*** | | | | |
| 3.6.1.1 | | When a large-scale mining (LSM) operating company has identified the presence of artisanal and small-scale mining (ASM) entities on the LSM concession or in close proximity to LSM operations, the operating company shall carry out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring. | 1.4.3.2 | | The scoping process determines whether the ENTITY plans to source/purchase, or actually sources/purchases minerals from ASM entities or individuals. | *This was 3.6.1.1* |
| ***3.4.1*** | | ***Conflict-Affected High-Risk Area Screening*** | ***1.4.4*** | | ***Mineral Supply Chain Controls and Transparency*** | |
| 3.4.1.1 | | The operating company shall conduct a screening analysis, based on evidence from credible sources, to determine whether or not the mining project is located in and/or sources minerals from a conflict-affected or high-risk area. | 1.4.4.1 | | For Mineral Processing operations, the scoping process required in 1.4.3.1 and 1.4.3.2 is informed by the information required in Section 1.4.4 (1.4.4.2 to 1.4.4.4), to determine potential "red flags" as defined in the OECD Guidance and available in Annex 1.4-B:a. The scoping process determines and documents any red flag location of mineral origin and transit;<br>b. The scoping process determines and documents any supplier red flag; and<br>c. The scoping process determines and documents any general red flag circumstances. | *This was part of 3.4.1.1.* |

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| 3.4.2.2 | | When operating in a conflict-affected or high-risk area, the operating company shall:<br>a. Adopt and communicate to the public and stakeholders a commitment that when operating in a conflict-affected or high-risk area the operating company will not knowingly or intentionally cause, contribute to or be linked to conflict or the infringement of human rights by any party;<br>b. Maintain documentation on the quantity and dates of mineral extraction; quantity and dates of minerals obtained from other sources (e.g., from ASM); locations where minerals are consolidated, traded or processed; all mining-related taxes, fees, royalties or other payments made to governmental officials for the purposes of extraction, trade, transport and export of minerals; all taxes and other payments made to public or private security forces or other armed groups; identification of all actors in the upstream supply chain; and transportation routes. This information shall be made available to downstream purchasers and auditors and to any institutionalized mechanism, regional or global, with the mandate to collect and process information on minerals from conflict-affected and high-risk areas;<br>c. Assign authority and responsibility to senior staff with the necessary competence, knowledge and experience to oversee the conflict due diligence processes; and<br>d. Ensure that stakeholders have access to and are informed about a mechanism to raise conflict-related concerns or grievances. | 1.4.4.2 | | For Mineral Processing operations, the ENTITY has a chain of custody and/or traceability system in place that collects and maintains the following information:<br>a. All taxes, fees or royalties paid to government for the purposes of extraction, trade, transport and export of minerals;<br>b. Any other payments made to governmental officials for the purposes of extraction, trade, transport and export of minerals;<br>c. All taxes and any other payments made to public or private security forces or other armed groups at all points in the supply chain from extraction onwards;<br>d. The ownership (including beneficial ownership) and corporate structure of the exporter/s, including the names of corporate officers and directors;<br>e. The business, government, political or military affiliations of the company/ies and officers;<br>f. The mine/s of mineral origin;<br>g. Quantity, dates and method/s of extraction (artisanal and small-scale or large-scale mining);<br>h. Locations where minerals are consolidated, traded, processed or upgraded;<br>i. The identification of all upstream intermediaries, consolidators or other actors in the upstream supply chain;<br>j. Transportation routes; and<br>k. Records of all this information (a. to j.) are kept for a minimum of five years. | *This was covered in 3.4.2.2.b, but limited to soucring from CAHRAs. The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition ("OECD Guidance-3rd Edition") requires to collect the information anyway, and then to make the information available only for those minerals coming from red-flag locations. This has been clarified.* |
| | | | 1.4.4.3 | | If the ENTITY conducts mineral re-processing operations, it also collects and maintains the following information:<br>a. All export, import and re-export documentation, including records of all payments given for the purposes of export, import and re-export;<br>b. All taxes and any other payments made to public or private security forces or other armed groups;<br>c. The identification of all immediate supplier/s (local exporter/s);<br>d. All information provided by local exporter/s; and<br>e. Records of all this information (a. to d.) are kept for a minimum of five years. | *This is NEW, to strengthen alignment with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition ("OECD Guidance-3rd Edition")* |
| | | | 1.4.4.4 | | For Mineral Processing operations, the ENTITY can demonstrate that it:<br>a. Avoids, where practicable, cash purchases; and<br>b. Ensures that all unavoidable cash purchases of minerals are supported by verifiable documentation and preferably routed through official banking channels. | *This is NEW, to strengthen alignment with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition ("OECD Guidance-3rd Edition")* |

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| | | | 1.4.4.5 | | For Mineral Processing operations, to strengthen its engagement with mineral suppliers the ENTITY can demonstrate that it:<br>a. Establishes, where practicable, long-term relationships with suppliers as opposed to short-term or one-off contracts in order to build leverage over suppliers;<br>b. Communicates to suppliers its expectations on responsible supply chains of minerals from conflict-affected and high-risk areas;<br>c. Incorporates the supply chain policy and due diligence processes required in this Chapter into commercial contracts and/or written agreements with suppliers which can be applied and monitored, including, if deemed necessary, the right to conduct unannounced spot-checks on suppliers and have access to their documentation; and<br>d. Identifies opportunities to build capabilities of suppliers to improve their sustainability performance and conform to the Entity's supply chain policy, and where applicable, designs measurable improvement plans with relevant suppliers . | *This is NEW, to strengthen alignment with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition ("OECD Guidance-3rd Edition")* |
| 3.4.1.2 | | If a determination is made that the mining project is located in a conflicted-affected or high-risk area or it sources minerals from such areas, then the operating company shall undertake the additional due diligence steps outlined in the remainder of this chapter. | | | | *This is now covered in requirements 1.4.4.6 to 1.4.4.8.* |
| ***3.4.3*** | | ***Conflict Risk Assessment*** | | | | |
| 3.4.3.1 | | The operating company shall assess the risks to the company, workers and communities associated with operating in or sourcing minerals from the conflict-affected or high-risk area. Assessments shall include, at minimum:<br>a. Analysis of structural, root and proximate causes of the current conflict, and potential triggers of conflict in the area of operation;<br>b. Review of the factual circumstances of the operating company's mineral extraction, transport, and, if relevant, mineral sourcing and/or processing; and<br>c. Analysis of the risk that any of the company's activities may lead to the direct or indirect infringement of human rights, support of armed groups or otherwise contribute to conflict. | 1.4.4.6 | | For Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, the ENTITY:<br>a. Assesses the context of conflict-affected and high-risk areas within its mineral supply chain(s) (under way and planned);<br>b. Clarifies the chain of custody, the activities and relationships of all upstream suppliers;<br>c. Identifies the locations and qualitative conditions of the extraction, trade, handling and export of the mineral;<br>d. Assesses the factual circumstances and specific risks associated with conflict-affected and high-risk areas within its mineral supply chain against: 1) The ENTITY's supply chain policy and standards; 2) National laws of the countries where the ENTITY is domiciled or publicly-traded (if applicable), of the countries from which the minerals are likely to originate, and of transit or re-export countries; 3) Legal instruments governing company operations and business relations, | *This extends on former 3.4.3.1 and 3.4.3.2, and is in line with the OECD Guidance.* |

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| 3.4.3.2 | | Assessments shall follow a recognized risk assessment methodology, and be carried out and documented by competent professionals. | | | such as financing agreements, contractor agreements, and supplier agreements; and 4) Other relevant international instruments, such as the OECD Guidelines for Multinational Enterprises, international human rights and humanitarian law; and<br>e. Ensures that any reasonable inconsistency between a factual circumstance and the instruments listed in d. is considered a risk with potential adverse impacts. | |
| 3.4.6.1 | | The findings of conflict risk assessments, risk management plans and monitoring shall be reported to senior management of the operating company; and stakeholders, contractors, mine workers and other employees shall be informed of findings that are relevant to them. | 1.4.4.7 | | For Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, the ENTITY:<br>a. Reports all information gained and maintained pursuant to the due diligence requirements articulated in this Chapter, including the findings of the mineral supply chain risk and impact assessment required in Section 1.4.5 , to the responsible top management staff (see 1.4.1.1.h);<br>b. For all the minerals from a "red flag location of mineral origin and transit", makes all information gained and maintained pursuant to the due diligence requirements articulated in this Chapter, available to downstream purchasers and auditors<br>c. Also makes all this information (b.) available to any institutionalized mechanism (regional, or global once in place) with the mandate to collect and process information on minerals from conflict-affected and high-risk areas. | *a. was former 3.4.6.1*<br><br>*b. and c. were covered in former 3.4.2.2.* |
| 3.4.2.2 | | When operating in a conflict-affected or high-risk area, the operating company shall:<br>[...]<br>b. Maintain documentation on the quantity and dates of mineral extraction; quantity and dates of minerals obtained from other sources (e.g., from ASM); locations where minerals are consolidated, traded or processed; all mining-related taxes, fees, royalties or other payments made to governmental officials for the purposes of extraction, trade, transport and export of minerals; all taxes and other payments made to public or private security forces or other armed groups; identification of all actors in the upstream supply chain; and transportation routes. This information shall be made available to downstream purchasers and auditors and to any institutionalized mechanism, regional or global, with the mandate to collect and process information on minerals from conflict-affected and high-risk areas; [...] | | | | |
| ***3.4.2*** | | ***Company Management Systems*** | | | | |
| 3.4.2.1 | | When operating in or sourcing minerals from a conflict-affected or high-risk area, the operating company shall not knowingly or intentionally cause, contribute to or be linked to conflict or the infringement of human rights by any party, or knowingly provide direct or indirect support to non-state armed groups or their affiliates, public security forces, or private security forces who:<br>a. Illegally control mine sites, transportation routes and upstream actors in the supply chain;<br>b. Illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or<br>c. Illegally tax or extort intermediaries, export companies or international traders. | 1.4.4.8 | Critical | For Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, the ENTITY can demonstrate that:<br>a. It does not knowingly or intentionally cause, contribute to, or is linked to, conflict or the infringement of human rights;<br>b. It does not knowingly provide direct or indirect support to non-state armed groups or their affiliates, public security forces, or private security forces who: 1) Illegally control mine sites, transportation routes and upstream actors in the supply chain; and/or 2) Illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; and/or 3) Illegally tax or extort intermediaries, export companies or international traders.<br>c. Building on Section 1.4.5, a prevention, mitigation, and remediation plan (or equivalent) has been developed by competent professionals to prevent, mitigate, and remediate all the potential and actual human | *This combines former 3.4.2.1, and 3.4.4.1 to 3.4.4.3.* |

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| ***3.4.4*** | | ***Conflict Risk Management*** | | | rights, social, and environmental impacts identified within the Entity's mineral supply chain, in accordance with Requirements 1.4.7.1 to 1.4.7.9;<br>d. Whenever a mineral supplier involved in potential or actual adverse impacts is identified as an SME, the ENTITY ensures that it provides targeted and proportionate support to this SME, where necessary in light of the resources, knowledge and constraints of the SME, in accordance with Section 1.4.8; and<br>e. Suspension and Termination of Business Relationships with mineral suppliers is handled in accordance with Section 1.4.9. | |
| 3.4.4.1 | | The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate risks identified through the risk assessment process. | | | | |
| 3.4.4.2 | | The operating company shall collaborate with relevant stakeholders to develop culturally appropriate strategies to prevent or mitigate risks that are relevant to them; to develop performance objectives, timelines and indicators to measure the effectiveness of the risk management strategies; and to update or revise its prevention and mitigation strategies as needed. | | | | |
| 3.4.4.3 | | If risks to human rights are identified in the assessment, the operating company shall adhere to the requirements in IRMA Chapter 1.3. | | | | |
| 3.4.2.2 | | When operating in a conflict-affected or high-risk area, the operating company shall:<br>[...]<br>d. Ensure that stakeholders have access to and are informed about a mechanism to raise conflict-related concerns or grievances. | 1.4.4.9 | | For Mineral Processing operations, the ENTITY has a rights-compatible grievance mechanism and/or other mechanisms in place, developed and implemented in line with Chapter 1.6, through which the following stakeholders can raise, and seek resolution or remedy for, complaints and grievances related to the ENTITY's suppliers of mineral feedstock :<br>a. Natural or legal persons who are affected or have reasonable grounds to believe that they might be affected by an adverse impact, and the legitimate representatives of such persons on behalf of them, such as civil society organizations and Rights Defenders;<br>b. Trade unions and other workers' representatives representing natural persons working in the chain of activities concerned; and<br>c. Civil society organizations that are active and experienced in related areas where an adverse human rights and/or environmental impact is the subject matter of the complaint. | *This extends on former 3.4.2.2 and associated guidance, in line with the OECD Guidance.* |
| ***3.4.6*** | | ***Reporting*** | | | | |
| 3.4.6.2 | | On an annual basis, where the operating company is operating in or sourcing minerals from a conflict-affected or high-risk area, the company or its corporate owner shall publicly report on due diligence undertaken to ensure that its actions are not supporting armed conflict or the infringement of human rights in those areas. | 1.4.4.10 | | For Mineral Processing operations, the ENTITY makes and maintains publicly accessible an annual supply chain due diligence report that includes, in conformance with the OECD Guidance:a. Its Mineral Supply Chain Policy (see 1.4.1);<br>b. Details about its Management Systems for Mineral Supply Chain Due Diligence (see 1.4.1, 1.4.2, and 1.4.4);<br>c. Details about its Mineral Supply Chain Risk Assessment (see 1.4.3, 1.4.4, and 1.4.5);<br>d. Details about its Mineral Supply Chain Risk Management (see 1.4.4); and<br>e. Details about its Mineral Supply Chain Performance Tracking (see 1.4.12 and 1.4.13). | *This extends on former 3.4.6.2 and associated guidance, in line with the OECD Guidance.* |

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| ***3.4.1*** | | ***Conflict-Affected High-Risk Area Screening*** | ***1.4.5*** | | ***Risk and Impact Assessment*** | |
| 3.4.1.1 | | The operating company shall conduct a screening analysis, based on evidence from credible sources, to determine whether or not the mining project is located in and/or sources minerals from a conflict-affected or high-risk area. | 1.4.5.1 | | Building on 1.4.3, and 1.4.4 where applicable, an in-depth risk and impact assessment is carried out by competent professionals to identify whether any of the ENTITY's business relationships may be the cause of, or contribute to, or may take place in an area with confirmed or suspected presence of:<br>a. Armed conflict , widespread violence, widespread human rights abuses or other risks of harm to people;<br>b. Political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, or widespread violations of national or international law; and<br>c. The ENTITY has a system in place to ensure that, if and whenever this in-depth assessment identifies any of the ENTITY's business relationships to be the cause of, or contribute, or to take place in an area with confirmed or suspected presence of, any form of such conflicts or high risks (as per sub-requirements a. and b), heightened due diligence is carried out by competent professionals in accordance with Chapter 1.5. | *Requirement draws from 3.4.1.1 and 3.4.1.2 to ensure identification of CAHRAs (beyond the common use of pre-defined maps or lists of fragile jursidictions, a practice which is not adequate and largely ineffective).* |
| 3.4.1.2 | | If a determination is made that the mining project is located in a conflicted-affected or high-risk area or it sources minerals from such areas, then the operating company shall undertake the additional due diligence steps outlined in the remainder of this chapter. | | | | |
| ***3.4.3*** | | ***Conflict Risk Assessment*** | | | | |
| 3.4.3.1 | | The operating company shall assess the risks to the company, workers and communities associated with operating in or sourcing minerals from the conflict-affected or high-risk area. Assessments shall include, at minimum:<br>a. Analysis of structural, root and proximate causes of the current conflict, and potential triggers of conflict in the area of operation;<br>b. Review of the factual circumstances of the operating company's mineral extraction, transport, and, if relevant, mineral sourcing and/or processing; and<br>c. Analysis of the risk that any of the company's activities may lead to the direct or indirect infringement of human rights, support of armed groups or otherwise contribute to conflict. | 1.4.5.2 | IRMA+ | *This in-depth assessment identifies and assesses potential and actual human rights, social, and environmental impacts, listed in Annex 1.4-A, from the ENTITY's business partners. It includes:*<br>*a. A comprehensive list of the potential and actual human rights, social, and environmental impacts related to the operations of the ENTITY's business partners;*<br>*b. An evaluation of the severity of each identified actual impact, and of the likelihood for and potential severity of each identified risk;*<br>*c. For each identified potential and actual upstream and downstream human rights, social, and environmental impacts, a determination of whether the potential or actual adverse impact may: 1) be caused only by the ENTITY; 2) be caused jointly by the ENTITY and business partner, through acts or omissions; or 3) be caused only by an ENTITY's business partner in the chain of activities;*<br>*d. Where relevant, a determination of the ability of the ENTITY to influence the business partner that may cause or jointly cause the potential or actual adverse impact; and*<br>*e. Recommended measures that can be taken by the ENTITY to prevent all identified potential and actual impacts and, if not possible to prevent them, to mitigate and to remediate them .* | *This draws from former 3.4.3.1 (required for mineral processing operations sourcing from CAHRAs, but is also expanded as an OPTIONAL requirement to all other scenarios and types of operations, to align with EU CSDDD)* |

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| 3.4.3.3 | | Assessments shall be based on credible evidence including on-the-ground research, expert advice, and information from consultations with relevant stakeholders, including men, women, children (or their representatives) and other vulnerable groups. | 1.4.5.3 | IRMA+ | *This in-depth assessment:*<br>*a. Is informed by relevant internal and/or external human rights, social, and environmental expertise, incorporate analysis of credible independent reports and sources of information;*<br>*b. Includes an explanation of the assessment methodology;*<br>*c. Where necessary information can be obtained from business partners at different levels of the chain of activities, the ENTITY prioritize requesting such information, where reasonable, directly from business partners where the adverse impacts are most likely to occur; and*<br>*d. Where it is not feasible to prevent, mitigate, bring to an end or minimize all identified adverse impacts (as per 1.4.5.1.a) at the same time and to their full extent, it identifies the adverse impacts the ENTITY will prioritize, based on their severity and likelihood .* | *This draws from former 3.4.3.1 and 3.4.3.3 (required for mineral processing operations sourcing from CAHRAs, but is also expanded as an OPTIONAL requirement to all other scenarios and types of operations, to align with EU CSDDD)* |
| ***3.6.4*** | | ***Perform Due Diligence in Commercial Relationships with ASM*** | ***1.4.6*** | | ***Commercial Relationships with ASM*** | |
| 3.6.4.1 | | When a large-scale mine sources minerals from or has other commercial relationships with ASM entities, the operating company shall:<br>a. Regularly assess the social and environmental risks and impacts related to the ASM entities with whom it has a commercial relationship;<br>b. Collaborate with those ASM entities with whom it can legally and legitimately engage to develop and implement a plan to eliminate or mitigate the most significant risks, and over time, address other social and environmental risks related to those ASM operations; and<br>c. Periodically monitor the effectiveness of mitigation strategies, and adapt plans as necessary to facilitate continued minimization of risks. | 1.4.6.1 | IRMA+ | *If the ENTITY proposes to source/purchase, or actually sources/purchases minerals from ASM entities or individuals (hereafter referred to as 'ASM organizations'), the ENTITY:*<br>*a. Identifies the legal status of these ASM organizations and maintains commercial relationships only with those engaged in legitimate ASM ;*<br>*b. Regularly assesses the safety, social and environmental risks and impacts related to the ASM organizations with whom it may have or has a commercial relationship, in accordance with Section 1.4.5 to the extent possible ; and*<br>*c. Collaborates with those ASM organizations with whom it can legally and legitimately engage, to develop and implement a plan to eliminate or mitigate the most significant risks and, over time, address other social and environmental risks related to those ASM operations, in accordance with Section 1.4.7 to the extent possible.* | *a. comes from the guidance to 3.4.6.1*<br>*b. and c. This was covered in former 3.4.6.1* |
| | | | 1.4.6.2 | IRMA+ | *If the ENTITY proposes to source/purchase, or actually sources/purchases minerals from ASM organizations, the ENTITY also:*<br>*a. Monitors and evaluates, at least annually, the effectiveness of its mitigation strategies, and adapts plans as necessary to facilitate continued minimization of risks, in accordance with Sections 1.4.12 and 1.4.13 to the extent possible;*<br>*b. Participates in, or supports, initiatives that promote the professionalization, formalization and/or certification of ASM organizations, and supports development opportunities for ASM communities, as appropriate to the situation; and*<br>*c. Offers fair commercial terms to all ASM suppliers .* | *a. was covered in former 3.4.6.1*<br>*b. and c. are new* |

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| | | | ***1.4.7*** | | ***Prevention, Mitigation, and Remediation Plan*** | |
| | | | 1.4.7.1 | IRMA+ | *Building on 1.4.3, 1.4.4 where applicable, 1.4.5, and other relevant sources of information , and without undue delay, a prevention, mitigation, and remediation plan (or equivalent) is developed by competent professionals to prevent, mitigate, and remediate all upstream and downstream risks and impacts on human rights, social, and environmental issues identified. The plan:*<br>*a. Outlines the agreed specific measures to prevent or neutralize and, where prevention is not possible or not immediately possible, to adequately mitigate all risks and adverse impacts;*<br>*b. Where it is necessary to prioritize measures to address risks and adverse impacts, it first seeks to prevent and mitigate those that are most severe or where delayed response would make them irremediable, as per 1.4.5.3.d; and*<br>*c. Includes qualitative and quantitative performance criteria and indicators (including gender- and/or rights-holder-disaggregated indicators where appropriate), linked to adequate baseline data, to enable monitoring and evaluation of the effectiveness of measures over time.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |

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| | | | 1.4.7.2 | IRMA+ | *In order to prevent risks and impacts, and where prevention is not possible or not immediately possible, to minimize and mitigate them, this plan ensures that the ENTITY, where relevant:*<br>*a. Seeks contractual assurances from any direct business partner involved that it will ensure compliance with the company's Code of Conduct (required in Section 1.4.2), and, as necessary, a prevention and/or corrective action plan, including by establishing corresponding contractual assurances from its partners, to the extent that their activities are part of the ENTITY' chain of activities;*<br>*b. Seeks contractual assurances from any indirect business partner involved with a view to achieving compliance with the ENTITY's Code of Conduct and, as necessary, a prevention and/or corrective action plan;*<br>*c. Accompany such contractual assurances (a. and b.) by appropriate measures to verify compliance ;*<br>*d. Makes necessary financial or non-financial investments in, adjustments or upgrades of, for example, facilities, production or other operational processes and infrastructures;*<br>*e. Makes necessary modifications of, or improvements to, the ENTITY's own business plan, overall strategies and operations, including purchasing practices, design and distribution practices; and*<br>*f. In compliance with applicable laws and regulations, including competition laws, collaborates with other companies and organizations, including, where relevant, in order to increase the ENTITY's ability to prevent or mitigate the adverse impact, in particular where no other measure is suitable or effective.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | 1.4.7.3 | IRMA+ | *This plan ensures that the ENTITY also assesses the possibility of, and where possible integrates measures to, where relevant:*<br>*a. Engaging with any involved business partner about the ENTITY's expectations with regard to preventing and/or mitigating potential adverse impacts;*<br>*b. Providing or enabling access to capacity-building, guidance, and/or administrative support, while taking into consideration the resources, knowledge and constraints of the business partner; and*<br>*c. Providing or enabling access to financial support such as loans or financing, while taking into consideration the resources, knowledge and constraints of the business partner.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |

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| | | | 1.4.7.4 | IRMA+ | *Where actual upstream or downstream human rights, social, and/or environmental adverse impacts have arisen in connection with a direct or indirect business partner, this plan ensures that:*<br>*a. The ENTITY develops and implements measures to provide remediation, to the greatest extent possible in collaboration with the affected rights-holders and stakeholders/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 the affected rights-holders and stakeholders/rights-holders;*<br>*b. Where the ENTITY does not bear the sole responsibility of the impacts, it mitigates and remediates them to the extent of its contribution, and uses its leverage to influence any direct or indirect business partner involved to mitigate and remediate the remaining impacts; and*<br>*c. Where the actual adverse impact is caused only by ENTITY' business partner/s, the ENTITY uses its leverage to influence any business partner that is causing the adverse impact to provide remediation, and the ENTITY assesses the possibility of, and where possible integrates measures to provide voluntary remediation company to the affected rights-holders and stakeholders/rights-holders.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | 1.4.7.5 | IRMA+ | *To ensure effective implementation of this prevention, mitigation, and remediation plan, the ENTITY:*<br>*a. Assigns implementation of measures to responsible staff with adequate skills and expertise;*<br>*b. Assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;*<br>*c. Has clearly-defined timelines and an implementation schedule in place that specifies the expected outcomes;*<br>*d. Maintains estimates of human resources and budget required; and*<br>*e. Has a financing plan in place to ensure that funding is available for the effective implementation of the plan.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | ***1.4.8*** | | ***Relationship with Small and Medium Enterprises (SMEs)*** | |

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| | | | 1.4.8.1 | IRMA+ | *If and whenever a business partner involved in potential or actual adverse impacts is identified as an SME, the ENTITY has a system in place to ensure that it provides targeted and proportionate support to this SME, where necessary in light of the resources, knowledge and constraints of the SME, through:*<br>*a. Providing or enabling access to capacity-building;*<br>*b. Training or upgrading management systems; and*<br>*c. Where compliance with the Code of Conduct or prevention or mitigation action plans would jeopardize the viability of the SME, by providing targeted and proportionate financial support, such as direct financing, low-interest loans, guarantees of continued sourcing, or assistance in securing financing.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | ***1.4.9*** | | ***Suspension and Termination of Business Relationships*** | |
| | | | 1.4.9.1 | IRMA+ | *The ENTITY has a system in place to ensure that, as a last resort, when all the measures required in Sections 1.4.7 and 1.4.8 have failed to prevent or adequately mitigate any potential or actual adverse impact that has arisen in connection with a direct or indirect business partner:*<br>*a. The ENTITY refrains from entering into new or extending existing relations with this business partner;*<br>*b. The ENTITY adopts and implements an enhanced prevention action plan (or equivalent) for the specific adverse impact without undue delay, by using or increasing the ENTITY' leverage through the temporary suspension of business relationships with respect to the activities concerned, provided that there is a reasonable expectation that those efforts will succeed ; and*<br>*c. If there is no reasonable expectation that those efforts would succeed, or if the implementation of the enhanced prevention action plan has failed to prevent or mitigate the adverse impact, the ENTITY terminates the business relationship with respect to the activities concerned if the potential adverse impact is severe.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |

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| | | | 1.4.9.2 | IRMA+ | *The ENTITY has a system in place to ensure that:*<br>*a. Where it decides to temporarily suspend or to terminate a business relationship as per 1.4.9.1, it takes steps to prevent, mitigate or bring to an end the impacts of the suspension or termination;*<br>*b. It provides reasonable notice to the business partner concerned (a.);*<br>*c. It keeps that decision under review (a.);*<br>*d. Where it decides not to temporarily suspend or terminate the business relationship as per 1.4.9.1, it monitors the potential adverse impact;*<br>*e. It periodically assesses its decision (d.); and*<br>*f. It periodically assesses whether further appropriate measures are available.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | ***1.4.10*** | | ***Meaningful Engagement with Stakeholders*** | |
| | | | 1.4.10.1 | IRMA+ | *In accordance with Chapter 1.2, the ENTITY has a system in place to ensure that relevant stakeholders are consulted at the following stages of the upstream and downstream sustainability due diligence process:*<br>*a. When gathering the necessary information on actual or potential adverse impacts, in order to identify, assess and prioritize adverse impacts as per Section 1.4.5;*<br>*b. When developing prevention and corrective action plans as per Section 1.4.7;*<br>*c. When developing enhanced prevention and corrective action plans as per Section 1.4.9;*<br>*d. When deciding to terminate or suspend a business relationship as per Section 1.4.9;*<br>*e. When adopting appropriate measures to remediate adverse impacts as per Section 1.4.7; and*<br>*f. As appropriate, when developing qualitative and quantitative indicators as per Section 1.4.7.* | *New OPTIONAL requirement to align with EU CSDDD* |

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| | | | 1.4.10.2 | IRMA+ | *To ensure an effective and meaningful engagement with stakeholders on upstream and downstream sustainability due diligence, this system ensures that the ENTITY proactively shares with them, in accordance with Section 1.2.2:*<br>*a. Relevant and comprehensive Information about the ENTITY's upstream and downstream risk and impact assessment as per Section 1.4.5;*<br>*b. Relevant and comprehensive Information about the development and implementation of the ENTITY's upstream and downstream prevention, mitigation, and remediation plan as per Section 1.4.7; and*<br>*c. Relevant and comprehensive information about the content and implementation of the ENTITY's system to suspension and terminate of business relationships with direct or indirect business partners with which potential or actual adverse impacts have arisen as per Section 1.4.9.* | *New OPTIONAL requirement to align with EU CSDDD* |
| | | | 1.4.10.3 | IRMA+ | *This system also ensures that:*<br>*a. Where it is not reasonably possible to carry out effective engagement with stakeholders to the extent necessary to comply with the requirements of this Chapter, the ENTITY consults additionally with experts who can provide credible insights into actual or potential adverse impacts, upstream and downstream the ENTITY's chain of activities;*<br>*b. In consulting stakeholders, the ENTITY identifies and addresses barriers to engagement, in line with Section 1.2.5; and*<br>*c. Participants are not the subject of retaliation or retribution, including by maintaining confidentiality or anonymity, and for participants who are workers or workers' representatives engagement occurs without prejudice to applicable employment and social rights as well as to any applicable collective agreements.* | *New OPTIONAL requirement to align with EU CSDDD* |
| | | | ***1.4.11*** | | ***Complaints Procedure*** | |

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| | | | 1.4.11.1 | IRMA+ | *The ENTITY has a grievance mechanism and/or other mechanisms in place, developed and implemented in line with Chapter 1.6, through which the following rights-holders and stakeholders can raise, and seek resolution or remedy for, complaints and grievances related to the ENTITY's upstream and downstream business partners :*<br>*a. Natural or legal persons who are affected or have reasonable grounds to believe that they might be affected by an adverse impact, and the legitimate representatives of such persons on behalf of them, such as civil society organizations and Rights Defenders;*<br>*b. Trade unions and other workers' representatives representing natural persons working in the chain of activities concerned; and*<br>*c. Civil society organizations that are active and experienced in related areas where an adverse human rights and/or environmental impact is the subject matter of the complaint.* | *New OPTIONAL requirement to align with EU CSDDD* |
| | | | 1.4.11.2 | IRMA+ | *The ENTITY can demonstrate that*<br>*a. This grievance mechanism and/or other mechanisms (1.4.1.11) are rights-compatible ;*<br>*b. The relevant rights-holders and stakeholders (see 1.4.1.11) have been informed about the existence and functioning of this grievance mechanism (or other mechanisms).*<br>*c. If the operational-level grievance mechanism developed as per Chapter 1.6 (Complaints and Grievance Mechanism and Access to Remedy) is used as the mechanism to receive complaints and grievance specifically related to ENTITY's upstream and downstream business partners, the Entity fully meets all requirements in Chapter 1.6.*<br>*d. If a separate mechanism is created to handle only human rights complaints and grievances, it is established and management in a manner that fully meets all requirements in Chapter 1.6.* | *New OPTIONAL requirement to align with EU CSDDD* |
| | | | ***1.4.12*** | | ***Monitoring and Evaluation*** | |

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| | | | 1.4.12.1 | IRMA+ | *To monitor and evaluate the implementation and effectiveness of its prevention, mitigation, and remediation plan, the ENTITY:*<br>*a. At least annually, monitors and evaluates its performance, over successive time periods, against the criteria and indicators defined in 1.4.7.1 and informed by stakeholder engagement as per 1.4.10.2;*<br>*b. At least annually, monitors and evaluates how the measures developed and implemented as per 1.4.7.2, 1.4.7.3, and 1.4.7.4 are adequately and effectively preventing, and where prevention is not possible or not immediately possible, mitigating potential upstream and downstream human rights and environmental adverse impacts; and*<br>*c. At least annually, monitors and evaluates how the measures developed and implemented as per 1.4.7.5, 1.4.7.6, 1.4.7.7, and 1.4.7.8 are adequately and effectively preventing, and where prevention is not possible or not immediately possible, mitigating or remediating actual upstream and downstream human rights and environmental adverse impacts.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | 1.4.12.2 | IRMA+ | *The monitoring and evaluation process:*<br>*a. Encourages and facilitates joint tracking or joint fact-finding with affected rights-holders and stakeholders/rights-holders*<br>*b. Includes specific facilitation measures to include people from different genders, ages, ethnicities, and disabilities;*<br>*c. Includes specific facilitation measures to include any potentially underserved and/or marginalized people;*<br>*d. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected rights-holders and stakeholders; and*<br>*e. Includes safeguards to protect the security and privacy of collected personal data or characteristics of affected rights-holders and stakeholders .* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | ***1.4.13*** | | ***Continuous Improvement*** | |

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| | | | 1.4.13.1 | IRMA+ | *At least annually, but without undue delay after a significant change occurs and whenever there are reasonable grounds to believe that new risks of the occurrence of upstream or downstream adverse impacts may arise, the ENTITY:*<br>*a. Reviews the monitoring and evaluation results, informed by internal and external feedback, as per Section 1.4.12;*<br>*b. Reviews any grievances related to upstream or downstream sustainability, and the functioning of its relevant grievance mechanism/s required in 1.4.11.1 (see also Section 1.6.3);*<br>*c. Reviews the ENTITY's effectiveness in preventing, and where prevention is not possible or not immediately possible, mitigating and remediating potential and actual upstream and downstream human rights, social, and environmental adverse impacts, informed by the monitoring and evaluation required in 1.4.12.1 and 1.4.12.2;*<br>*d. Updates its sustainability due diligence policy in accordance with Section 1.4.1 and/or its Code of Conduct in accordance with Section 1.4.2, if the reviews (a. to c.) indicate a need for such updates;*<br>*e. Develops and implements time-bound corrective measures to update its scoping in accordance with Section 1.4.4 and/or its risk and impact assessment in accordance with Section 1.4.5, if the reviews (a. to c.) indicate a need for such updates;*<br>*f. Develops and implements time-bound corrective measures to update, if necessary, its prevention, mitigation, and remediation plan in accordance with Section 1.4.7, if the reviews (a. to c.) indicate a need for such updates;*<br>*g. Develops and implements time-bound corrective measures to update its approach to SMEs in accordance with Section 1.4.8 and to the suspension and termination of business relationships in accordance with Section 1.4.9, if the reviews (a. to c.) indicate a need for such updates; and*<br>*h. Develops and implements time-bound corrective measures to update its monitoring and evaluation processes in accordance with Section 1.4.12, if the reviews (a. to c.) indicate a need for such updates.* | *New OPTIONAL requirement to align with EU CSDDD*<br><br>*(Note that for Mineral Processing operations, if the red flag review required in 1.4.4.1, or the in-depth assessment (as per 1.4.5.1), has indicated the presence of CAHRAs in the ENTITY's mineral supply chain, Sections 1.4.7, 1.4.8, 1.4.9, 1.4.12, and 1.4.13 should not be considered optional.)* |
| | | | ***1.4.13*** | | ***Continuous Improvement*** | |

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| | | | 1.4.14.1 | IRMA+ | *At least annually, the ENTITY makes and maintains publicly accessible all updated and previous versions of:*<br>*a. Its risk and impact assessment, including an explanation of the assessment methodology and a list of the risks and impacts identified (see Section 1.4.5);*<br>*b. Its prevention, mitigation, and remediation plan, including prioritization criteria and the measures taken to prevent, mitigate, and remediate upstream and downstream human rights, social, and environmental risks and impacts (see Section 1.4.7);*<br>*c. The qualitative and quantitative performance criteria and indicators used to monitor and evaluate the effectiveness and appropriateness of its prevention, mitigation, and remediation plan (defined in 1.4.7.1 and informed by stakeholder engagement as per 1.4.10.2);*<br>*d. Key findings of the monitoring and evaluation process required in 1.4.12, and of the reviews required in 1.4.13;*<br>*e. A summary of the measures developed and implemented as per 1.4.7.5, 1.4.7.6, 1.4.7.7, and 1.4.7.8, and the extent to which they effectively prevented actual adverse impacts, and where prevention was not possible or immediately possible, provided timely and adequate remediation to affected rights-holders and stakeholders/rights-holders;*<br>*f. A list of the time-bound corrective measures identified as per 1.4.13.2.*<br>*g. This public reporting (a. to k..) occurs with due regard for the safety and data privacy of affected rights-holders and stakeholders.* | *New OPTIONAL requirement to align with EU CSDDD* |

## Chapter 1.5 Conflict-Affected and High-Risk Area Due Diligence

This is a new Chapter

# Chapter 1.6 Grievance Mechanism, Whistleblowers, and Access to Remedy

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **1.4** | | **Complaints and Grievance Mechanism and Access to Remedy** | **1.6** | | **Grievance Mechanism, Whistleblowers, and Access to Remedy** | |
| ***1.4.1*** | | ***Access to Operational-Level Complaints and Grievance Mechanism*** | ***1.6.1*** | | ***Operational-Level Grievance Mechanism*** | *Revised heading* |
| 1.4.1.1 | Critical | The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as "stakeholders") have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities. | 1.6.1.1 | Critical | The ENTITY has an operational-level grievance mechanism (or equivalent) in place that:<br>a. Allows all affected rights-holders and stakeholders, and others (referred to collectively as "stakeholders") 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;<br>b. 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;<br>c. Clearly defines how complainants can file grievances anonymously, and/or confidentially;<br>d. 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 ;<br>e. 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<br>f. 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. | *Expands upon former 1.4.1.1 and incorporates former 1.4.2.1 and 1.4.3.1 content.*<br>*with extra content added re. human rights abuses.*<br>*Moved reference in former 1.4.2.1.a to the effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights (former 1.4.2.1.a) to the guidance notes as they were redundant with other substantive requirements.*<br>*Removed the element that consultation had to occur in the design of the mechanism, because that implied that it would have needed to happen prior to or during the initial development of the mechanism itself. The primary intent is that stakeholders have a say in the grievance mechanism and its procedures to improve its effectiveness (which is now covered in section 1.6.5 ['continuous improvement']).*<br><br>*d. draws on former 1.4.2.1.f (aligned with enhanced focus on gender Standard-wide)*<br><br>*e. and f. draw on former 1.4.3.1 and 1.4.5.2, both of which obligate entities to be clear (in procedures and communications, respectively) that grievance mechanism use does not preclude recourse to other options.*<br><br>*Made critical in response to public feedback that the former critical requirement (1.4.1.1) which had no 'qualitative' criteria was insufficient.* |
| 1.4.2.1 | | The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:<br><br>a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue;<br><br>b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase;<br><br>c. How confidentiality of a complainant's identity will be respected, if requested;<br><br>d. The ability to file anonymous complaints, if deemed necessary by stakeholders;<br><br>e. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups;<br><br>f. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and<br><br>g. How complaints and grievances and their resolutions will be tracked and recorded. | | | | | |
| 1.4.3.1 | | No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies. | | | | |

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| 1.4.5.2 | | The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies. | | | | |
| 1.4.2.1 | | The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:<br><br>a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue;<br><br>b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase;<br><br>c. How confidentiality of a complainant's identity will be respected, if requested;<br><br>d. The ability to file anonymous complaints, if deemed necessary by stakeholders;<br><br>e. The provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups;<br><br>f. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and<br><br>g. How complaints and grievances and their resolutions will be tracked and recorded. | 1.6.1.2 | | This grievance mechanism ensures that:<br>a. 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 without prejudice to applicable employment rights and social benefits as well as to any applicable collective agreements;<br>b. Differentiated gender-sensitive procedures are in place to provide timely, appropriate, and effective remedies specifically for women, girls, and LGBTIQA+ complainants, particularly where they are survivors of discrimination and/or sexual- and gender-based violence;<br>c. 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 , and identifies support and facilitation measures; and<br>d. 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. | *a. added additional information to more clearly state a zero-tolerance approach to retaliation for utilizing grievance mechanism.*<br><br>*b. provides details re. gender-sensitie procedures*<br><br>*c. and d. incorporate intent of former 1.4.2.1.e.* |
| | | | ***1.6.2*** | | ***Whistleblowing Mechanism*** | *Section added to highlight more specifically a whistleblowing component of the grievance process* |

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| | | | 1.6.2.1 | | The ENTITY has a formal and documented whistleblower mechanism in place that:<br>a. Is overseen by a dedicated person or department;<br>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 related to the site or its associated facilities ;<br>c. Ensures that notifications can be made either anonymously or confidentially;<br>d. Ensures that the ENTITY prevents any form of retaliation 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<br>e. Ensures that individuals or entities that submit notifications 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. | *New requirement added to highlight more specifically a whistleblowing component.* |
| ***1.4.5*** | | ***Communications*** | ***1.6.3*** | | ***Implementation and Management*** | *New heading* |
| 1.4.5.1 | | The operating company shall take reasonable steps to inform all stakeholders of the existence of the operational-level complaints and grievance mechanism, its scope, and its procedures. | 1.6.3.1 | | 1.6.3.1 affected rights-holders and stakeholders are proactively and preemptively informed, in accordance with Section 1.2.3, about:<br>a. The existence of the operational-level grievance mechanism, of the whistleblowing mechanism, and their associated procedures;<br>b. How to file a grievance and to submit whistleblowing notifications;<br>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;<br>d. The ability of any complainant to request appropriate follow-up on the complaint from the ENTITY;<br>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<br>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. | *Adapted from former 1.4.2.1, 1.4.2.2, 1.4.5.1, 1.4.5.2 to add specificity on obligations to inform stakeholders.*<br><br>*b. formerly 1.4.2.1.b*<br><br>*c. formerly 1.4.5.2.*<br><br>*e. new sub-requirement specifying additional stakeholder right*<br><br>*d. and f. refer to rights already implicit in former 1.4.2.1.* |
| 1.4.5.2 | | The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies. | | | | |
| 1.4.2.1 | | The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:<br><br>...<br><br>b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase; | | | | |

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| 1.4.5.3 | | The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances, and ensure that personnel directly involved in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous. | 1.6.3.2 | | The ENTITY has a system in place to ensure that:<br><br>a. Relevant personnel (including ENTITY's employees and contractors) who interact with stakeholders are informed of, and understand, the proper procedures for handling stakeholder grievances;<br><br>b. Relevant personnel (including ENTITY's employees and contractors) directly involved in the implementation and management of the operational-level mechanism receive training on the respectful and equitable handling of all grievances, whether real or perceived; and<br><br>c. All grievances are recorded, acknowledged, investigated, monitored, and equitably resolved or remedied, as per the procedures and indicative timeframes required in 1.6.1.1, and all whistleblowing notifications are recorded, acknowledged, investigated, monitored, and acted upon where relevant, as per the procedures and indicative timeframes required in 1.6.2.2. | *Adapted from former 1.4.5.3 - separates 'relevant personnel' into two types (sub-requirements a. and b.) for clarity.*<br><br>*c. incorporates intent from former 1.4.2.1.b - makes specific reference to whistleblowing mechanism (per new requirements 1.6.2.1).* |
| ***1.4.4*** | | ***Monitoring and Evaluation*** | ***1.6.4*** | | ***Monitoring and Evaluation*** | *No change* |
| 1.4.4.1 | | Complaints and grievances and their outcomes and remedies shall be documented. | 1.6.4.1 | | To monitor and evaluate the effectiveness and appropriateness of the measures taken to manage grievances and whistleblowing notifications, and to provide remedy, the ENTITY:<br><br>a. Regularly tracks and documents, over successive time periods, the number and nature of grievances filed , the measures and actions 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;<br><br>b. Regularly tracks and documents, over successive time periods, the number and nature of whistleblowing notifications submitted, the measures and actions 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 1.6.2.2; and<br><br>c. Disaggregates the data required in a. and b. according to gender- and/or stakeholder-group-specific indicators where appropriate. | *Expands significantly on the intent of former 1.4.4.1, the objective of which was, in part, to facilitate monitoring and evaluation.*<br><br>*b. new sub-requirement added per inclusion of whistleblowing mechanism*<br><br>*c. asks for disaggregation of data per Standard-wide changes* |

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| 1.4.4.3 | | Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism. | 1.6.4.2 | | The monitoring and evaluation process:<br><br>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, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, as per Chapter 1.2;<br><br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with complainants; and<br><br>c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of complainants and whistleblowers. | *Additional content added for specificity and to enhance quality and robustness of feedback opportunities mentioned in former 1.4.4.3*<br><br>*c. added in alignment with Standard-wide additions re: data security* |
| | | | ***1.6.5*** | | ***Continuous Improvement*** | *New section - added for Standard-wide consistency* |
| 1.4.4.2 | | The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine:<br><br>a. If changes need to be made to improve its effectiveness as per 1.4.2.1.a;<br><br>b. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and<br><br>c. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights. | 1.6.5.1 | | At least twice a year the ENTITY reviews:<br>a. Review monitoring and evaluation results, informed by internal and external feedback, as per Section 1.6.4;<br>b. 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 ;<br>c. 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.;<br>d. Develops and implements time-bound corrective measures to update, if necessary , its operational-level grievance mechanism/s 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;<br>e. Develops and implements time-bound corrective measures to update, if necessary , 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<br>f. Develops and implements time-bound corrective measures to update, if necessary , its monitoring and evaluation processes in accordance with Section 1.6.4. | *Expands on content in former 1.4.4.2*<br><br>*Former 1.4.4.2.c. content moved to 1.6.1.1.c*<br><br>*d. to f. new subrequirement - aligned with Plan-Do-Check-Act concept integrated Standard-wide (2018 Standard only asked for entities to review and evaluate performance; this approach makes more explicit the expectations for actions to be taken based on those M&E findings)* |
| ***1.4.6*** | | ***Reporting*** | ***1.6.6*** | | ***Information Sharing and Public Reporting*** | |

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| 1.4.6.1 | | Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances. | 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:<br><br>a. The reasons a complaint has been considered founded or unfounded and, where considered founded, with information on the measures taken or to be taken;<br><br>b. How their grievances were investigated, monitored, and resolved or remedied, as per the procedures and indicative timeframes required in 1.6.1.1; and<br><br>c. 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. | *Former 1.4.6.1 divided into two separate requirements (1.6.6.1 and 1.6.6.2) to clarify that entities need to report back to individuals with grievances on the results of thoss grievances, as well as report publicly on grievance trends, etc.(1.6.6.2).* |
| | | | 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 publicly accessible all updated and previous versions of:<br>a. The total number and nature of grievances filed and whistleblowing notifications submitted during the reporting period ;<br>b. The percentage of grievances that were addressed and resolved during the reporting period;<br>c. The percentage of grievances remedied during the reporting period;<br>d. These datapoints (a. to c.) are disaggregated by gender- and/or stakeholder-group-specific indicators where appropriate;<br>e. 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<br>f. A list of the time-bound corrective measures identified as per 1.6.5.1. | *See above* |
| ***1.4.2*** | | ***Development of Complaints and Grievance Procedures*** | | | | *Deleted - section content incorporated elsewhere* |
| ***1.4.3*** | | ***Access to Other Remedy Mechanisms*** | | | | *Deleted - section content incorporated elsewhere* |

## Chapter 1.7 Anti-Corruption and Financial Transparency

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **1.5** | | **Revenue and Payments Transparency** | **1.7** | | **Anti-Corruption and Financial Transparency** | |
| | | | ***1.7.1*** | | ***Formalized Policy*** | *New heading* |
| 1.5.5.1 | Critical | The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors. | 1.7.1.1 | | The ENTITY has a formal policy in place that:<br>a. Commits to zero tolerance towards all forms of corruption and other unethical behavior within the ENTITY's operations and the operations of its business partners;<br>b. Explicitly acknowledges the broad range of activities which can be described as corruption, including those which may be legal in a country of operation;<br>c. Is approved at the top management level of the ENTITY;<br>d. Is proactively communicated to personnel, contractors, and other relevant parties linked to the site and its associated facilities;<br>e. Is publicly accessible; and<br>f. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the project/operation. | *Expanded former 1.5.5.1 to reflect standard-wide changes to policy-related requirements.* |
| | | | 1.7.1.2 | IRMA+ | *The ENTITY has a formal policy in place that commits to respect legal frameworks and codes of conduct related to lobbying and political engagement applicable to the country of operation:*<br><br>*a. The policy is approved at the most senior level of the ENTITY, and is publicly accessible;*<br><br>*b. The policy explicitly sets out that the ENTITY will not mislead public officials or the public, that they will avoid placing officials in real or apparent conflict of interest situations, and that they provide public disclosures on direct and indirect lobbying carried out, including membership of any government advisory or expert groups; and*<br><br>*c. The policy is communicated to any lobbying firms contracted to represent the company, and the ENTITY has allocated financial and staffing resources to implement this policy at the level of the project/operation.* | *New OPTIONAL requirement to reflect latest international guidance relating to respect for legal frameworks.* |
| | | | ***1.7.2*** | | ***Risk and Impact Assessment*** | *New heading* |

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| | | | 1.7.2.1 | | A risk and impact assessment is carried out, by competent professionals, at the level of the project/operation, to identify and assess risk and impact related to corruption, money laundering, and unethical or anti-competitive behavior, from the ENTITY and its business partners. The assessment includes:<br><br>a. A comprehensive list of the risks and impacts related to corruption, money laundering, and unethical or anti-competitive behavior, from the ENTITY and its business partners;<br><br>b. An evaluation of the severity of each identified impacts, and of the likelihood for and potential severity of each identified risk; and<br><br>c. Recommended measures that can be taken by the ENTITY to prevent all identified risks and impacts and, where prevention is not possible or not immediately possible, to mitigate and to remediate them. | *New requirement, aligned with Chapter-wide changes to ensure risk assessments specified where necessary.*<br><br>*Aligned with RRA, CopperMark, and NRGI recommendation* |
| | | | 1.7.2.2 | IRMA+ | *This risk and impact assessment:*<br>*a. Incorporates data on beneficial ownership, conflicts of interest, Political Exposed Persons, and previous corruption cases and allegations;*<br>*b. Includes a description of how this data was used to assess risk; and*<br>*c. Is made and maintained publicly accessible, as well as all previous versions.* | *New OPTIONAL requirement.* |
| | | | ***1.7.3*** | | ***Prevention and Management Controls*** | *New heading* |
| 1.5.5.2 | | Procedures shall include:<br><br>a. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and<br><br>b. Disciplinary actions to be taken if cases of bribery or corruption are discovered. | 1.7.3.1 | Critical | Building on 1.7.2, the ENTITY has a system in place to ensure internal controls are implemented to prevent, detect and address all forms of corruption, money laundering, and unethical or anti-competitive behavior, through:<br>a. Banning the use of facilitation payments, including in countries where these payments are legal;<br>b. Clearly defined prohibited actions ;<br>c. Clearly defined corruption-risk-prone behaviors that may be deemed acceptable under certain circumstances, and corresponding approval processes;<br>d. Protections, including non-retaliation, for employees, contractors, and whistleblowers who raise concerns about suspected corruption, money laundering, or unethical or anti-competitive behavior associated with the site and its associated facilities, or who refuse to pay bribes even if such refusal results in the loss of business;<br>e. Investigation of alleged cases and situations that contravene the ENTITY's anti-corruption policies or procedures;<br>f. Disciplinary actions to be taken if a case or situation is confirmed;<br>g. Internal reporting and recording of all approved and unapproved | *Builds upon former 1.5.5.2 - the list of elements to include in the procedure has been expanded based on a gap analysis with other related standards.*<br><br>*h. from former 1.5.5.3* |

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| 1.5.5.3 | | Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures. | | | gifts, contributions, advantages, and payments given to or received from employees, contractors, agents or other intermediaries, business partners, and third-parties ; and<br>h. Regular training on the ENTITY's policy, procedures and controls for all relevant employees and contractors across all management levels, and, where appropriate, relevant business partners. | |
| | | | 1.7.3.2 | IRMA+ | *These internal controls also include:*<br>*a. A risk-based assessment of external reporting of bribe solicitation to the appropriate Law Enforcement Authority/ies;*<br>*b. Procedures for reporting bribe solicitation to the appropriate Law Enforcement Authority/ies, informed by the assessment required in a. ; and*<br>*c. Awareness-raising and training activities on bribe solicitation and the ENTITY's corresponding reporting procedure/s for all relevant employees and contractors across all management levels, and, where appropriate, relevant business partners.* | *New OPTIONAL requirement.* |
| | | | ***1.7.4*** | | ***Monitoring and Evaluation*** | *New heading, consistent with other Chapters in the IRMA Standard* |

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| | | | 1.7.4.1 | | To monitor and evaluate the effectiveness and appropriateness of its measures to prevent, detect and address all forms of corruption, money laundering, and unethical or anti-competitive behavior, the ENTITY, at least annually:<br>a. Tracks and documents, over successive time periods, the number and nature of confirmed incidents of corruption or other unacceptable behavior related to the project/operation;<br>b. Tracks and documents, over successive time periods, all public legal cases regarding corruption brought against the ENTITY and its corporate owner(s) or their employees during the reporting period, and the outcomes of such cases; and<br>c. Tracks and documents how the mitigation measures it put in place are effectively preventing, detecting and/or addressing all forms of corruption, money laundering, and unethical or anti-competitive behavior. | *New requirement - added to close the Plan-Do-Check-Act loop to deliver continuous improvement (through regular updates and revised processes and criteria, informed by monitoring, evaluation, and review), harmonized throughout the Standard.* |
| | | | ***1.7.5*** | | ***Continous Improvement*** | *New heading, consistent with other Chapters in the IRMA Standard* |
| | | | 1.7.5.1 | | At least annually, the ENTITY:<br>a. Reviews the monitoring and evaluation results, and its effectiveness in preventing, detecting and/or addressing all forms of corruption, money laundering, and unethical or anti-competitive behavior as per Section 1.7.4;<br>b. Reviews any corruption-related grievances filed through its grievance mechanism/s required in Section 1.6.1, and any notification submitted through its whistleblowing mechanism required in Section 1.6.2; and<br>c. Develops and implements time-bound corrective measures to update, if necessary , its risk and impact assessment in accordance with Section 1.7.2;<br>d. Develops and implements time-bound corrective measures to update, if necessary , its internal controls and mitigation measures in accordance with Section 1.7.3. | *See above.* |
| ***1.5.3*** | | ***Support for the Extractive Industries Transparency Initiative (EITI)*** | ***1.7.6*** | | ***Support for the Extractive Industries Transparency Initiative (EITI)*** | *Heading number changed* |

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| 1.5.3.1 | | If the mining project is located in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website. | 1.7.6.1 | | The ENTITY has formalized its support to the EITI as follows:<br>a. The ENTITY makes publicly accessible a clear statement endorsing the EITI Principles and the EITI Expectations for supporting companies;<br>b. This public statement explicitly includes the ENTITY's support for contract disclosure and beneficial ownership transparency; and<br>c. If the site is located in a country where EITI is active, the ENTITY engages constructively with, and supports implementation of, the EITI process in accordance with the EITI multi-stakeholder process adopted in that country. | *Expands upon intent of former 1.5.3.1*<br><br>*c. is adapted from former 1.5.3.2.a* |
| 1.5.3.2 | | If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall:<br><br>a. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and<br><br>b. Provide links on its external website to completed and up-to-date Company Forms for its operation, if the EITI implementing country has completed at least one validation. | | | | |
| ***1.5.1*** | | ***Disclosure of Country-Level Payments*** | ***1.7.7*** | | ***Financial Transparency*** | *Changed heading name* |
| 1.5.1.1 | | The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime. | 1.7.7.1 | | Annually, the ENTITY makes publicly accessible an updated version of, and maintains publicly accessible all previous versions of, a report of the payments made by its corporate owner/s, in relation with and at the level of the project/operation, to the producing country government, as follows:<br>a. All payments are broken down by recipient government body (where applicable);<br>b. For each recipient government body (where applicable), all payments are broken down by the following types of payment, as applicable: 1) The producing government's production entitlement; 2) National State-owned enterprise's production entitlement; 3) Bonuses, such as signature, discovery, and production bonuses; 4) License fees, rental fees, entry fees and other considerations for licenses and/or concessions (or equivalent); 5) Payments for infrastructure improvements; and<br>c. For each recipient government body (where applicable), all payments are broken down by the following types of payment, as applicable: 6) Taxes on income, production, or profits of companies ; 7) Taxes, tariffs, or other specific payments related to processing | *Previously, criterion 1.5.1 was divided into four separate requirements. In an effort to simplify and add clarity to this requirement, all expectations related to the publication of a report on payments to host country governments have been consolidated into one requirement here.*<br><br>*c. draws in part on former 1.5.2.2.e re: taxes and tarrifs on processing / transportation.*<br><br>*Removed references to the EU Accounting and Transparency Directives and other mandatory transparency regimes from the* |
| 1.5.1.2 | | On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year. | | | | |

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| | | | | | and/or transportation of minerals; 8) Royalties; 9) Dividends and; 10) Any other significant payments and material benefits to government, including in-kind payments. | *requirement text - instead of referring to a single regulatory approach to transparency, focus is on the best practices for what information is expected to be published. The types of payments listed are consistent with what is in the EU directives and in other similar laws.*<br><br>*Requirement that report be made available within 12 months after end of financial year from original 1.5.1.2 removed because reference to 'annually' publishing an update implies that it must occur within 12 months.* |
| 1.5.1.3 | | The types of payment disclosed shall include as a minimum, as applicable:<br><br>a. The host government's production entitlement;<br><br>b. National state-owned enterprise production entitlement;<br><br>c. Profits taxes;<br><br>d. Royalties;<br><br>e. Dividends;<br><br>f. Bonuses, such as signature, discovery and production bonuses;<br><br>g. Licence fees, rental fees, entry fees and other considerations for licences and/or concessions;<br><br>h. Payments for infrastructure improvements; and<br><br>i. Any other significant payments and material benefits to government, including in kind payments. | | | | |
| 1.5.1.4 | | At minimum, this information shall be broken down by recipient government body (where applicable), by project (where applicable), and by payment type. | | | | |

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| 1.5.2.2 | | The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:<br>a. Mine production, disaggregated by product type and volume;<br>b. Revenues from sales, disaggregated by product type;<br>c. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department);<br>d. Social expenditures, including the names and functions of beneficiaries;<br>e. Taxes, tariffs or other relevant payments related to transportation of minerals;<br>f. Payments to politicians' campaigns, political parties or related organizations; and<br>g. Fines or other similar penalties that have been issued in relation to the project. | 1.7.7.2 | | Annually, the ENTITY makes publicly accessible an updated version of, and maintains publicly accessible all previous versions of, a report of the following project-level information:<br>a. Payments to politicians' campaigns, political parties or related organizations;<br>b. Fines and/or other penalties related to the site or its associated facilities; and<br>c. Social expenditures, including the names and functions of beneficiaries.. | *a. was former 1.5.2.2.f.*<br>*b. was former 1.5.2.2.g*<br>*c. was former 1.5.2.2.d.* |
| 1.5.2.2 | | The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public:<br>a. Mine production, disaggregated by product type and volume;<br>b. Revenues from sales, disaggregated by product type;<br>[...] | 1.7.7.3 | | Annually, the ENTITY makes publicly accessible an updated version of, and maintains publicly accessible all previous versions of, a report of:<br>a. Its production of minerals and/or metals, disaggregated by product type and mass or volume, over the reporting period; and<br>b. Revenues from sales of minerals and/or metals, disaggregated by product type, over the reporting period; and<br>c. The ENTITY can demonstrate that it adheres to international accounting standards, including through credible third-party audits of its annual financial statements. | *Combines 1.5.2.2 and 1.5.2.3. Use terminology "production of minerals and/or metals" to make this also applicable to mineral processing sites.* |
| 1.5.2.3 | | The operating company shall publish annual accounts, following international accounting standards. | | | | |
| ***1.5.4*** | | ***Operating Company Transparency*** | ***1.7.8*** | | ***Contracts Disclosure*** | *New heading, more descriptive* |

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| 1.5.4.1 | | The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in the national language(s) of the country in which the mining project is located.<br><br>a. Where these terms are negotiated, rather than governed by law, the company shall make the relevant agreements, licenses or contracts freely and publicly accessible.<br><br>b. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement. | 1.7.8.1 | | 1.7.8.1 The ENTITY makes and maintains publicly accessible all the contracts and/or licenses that grant it the rights to, as relevant, exploration, development, extraction, and/or processing of minerals, as follows:<br>a. In full text without redaction ;<br>b. In the official language(s) of the country(ies) in which the site is located;<br>c. Including all related annexes, addendums, riders, and amendments, also in full text without redaction , and in the official language(s) of the country(ies) in which the site is located; and<br>d. Where these terms are not negotiated but rather governed by law, the ENTITY makes publicly accessible all relevant statutory documentation , including all related annexes, addendums, and amendments in full text without redaction. | *Clarifies former 1.5.4.1* |
| | | | ***1.7.9*** | | ***Beneficial Ownership*** | *New heading* |
| 1.5.4.2 | | The beneficial ownership of the operating company shall be publicly accessible. | 1.7.9.1 | | At least annually, or more frequently as required by applicable regulations and listing requirements, the ENTITY makes and maintains publicly accessible information on the beneficial owners that own at least 10% of the Entity(ies) that bid for, operate or invest in its mining-related assets and activities, as follows:<br><br>a. The names, nationalities and countries of residence of the individuals that are the ultimate beneficial owner(s) (i.e. not only direct shareholders) of these Entity(ies);<br><br>b. For each of those individuals, the level of ownership and details about how ownership or control is exerted; and<br><br>c. Clear identification of any beneficiaries who are politically exposed persons. | *Additional details added to increase transparency; based on the requirements of the 2016 EITI Standard.* |

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| | | | 1.7.9.2 | IRMA+ | *The ENTITY ensures that its annual public update on beneficial ownership:*<br><br>*a. Adopts a 3% ownership threshold, instead of 10%, for non-State-owned and non-State-controlled beneficial owners;*<br><br>*b. Includes details on all State-owned and State-controlled beneficial owners, regardless of their ownership level; and*<br><br>*c. Aggregates shares (or their equivalent) across holdings by family or close associates of a beneficial owner into one holding to determine the ownership level.* | *New OPTIONAL requirement.* |
| | | | ***1.7.10*** | | ***Information-Sharing and Public Reporting*** | *New heading, consistent with other Chapters in the IRMA Standard* |
| | | | 1.7.10.1 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of the following information, over the reporting period:<br>a. The total number and nature of confirmed incidents of corruption or other unacceptable behavior related to the site and its associated facilities;<br>b. The total number of confirmed incidents in which the project's/operation's employees were dismissed or disciplined for corruption or other unacceptable behavior;<br>c. The total number of confirmed incidents where the project's/operation's contracts with contractors or business partners were terminated or not renewed due to violations of the ENTITY's anti-corruption policy and procedures;<br>d. Details about all public legal cases regarding corruption brought against the ENTITY and its corporate owner(s) or their employees;<br>e. Details about the outcomes of such cases, including Deferred Prosecution Agreements (DPAs) and cases in countries other than the country(ies) of operation; and<br>f. Details about the mitigation measures the ENTITY has put in place to address corruption allegations within its operations and the operations of its business partners, and efforts made to monitor and track performance for risk mitigation. | *New requirement - formerly there were no expected reporting or disclosure requirements related to anti-corruption - addition of these requirements aligns with the Global Reporting Initiative's (GRI) requirements on reporting of corruption incidents.* |

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| | | | 1.7.10.2 | IRMA+ | *Annually, the ENTITY makes publicly accessible an updated version of, and maintains publicly accessible all previous versions of, a report of the following information:*<br><br>*a. Confirmation that no facilitation payments were made by the ENTITY or its corporate owner(s) to public or government officials (when operating in countries where such payments are legal), and if such payments were made (in breach of requirement 1.7.3.1.a) the ENTITY makes publicly accessible full disaggregated details and amounts;*<br><br>*b. The names, roles, and responsibilities of those involved in the ENTITY's or its corporate owner(s)' lobbying activities in relevant project-level jurisdictions; and*<br><br>*c. The names of public officials or institutions engaged as part of those lobbying activities, the subjects discussed, and the outcomes being sought.* | *New OPTIONAL reqruirement.* |
| ***1.5.2*** | | ***Disclosure of Project-Level Payments*** | | | | *Deleted - section content incorporated elsewhere* |
| ***1.5.5*** | | ***Anti-Corruption Measures*** | | | | *Deleted - section content incorporated elsewhere* |
| 1.5.2.1 | | The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below. | | | | *Deleted - reference to EU Directive 2013/34/EU has been removed. Although that directive covers some site-level transparency issues, those adhering to that directive may need to disclose additional data to meet the IRMA requirement.* |

# PRINCIPLE 2: PLANNING FOR POSITIVE LEGACIES

## Chapter 2.1 Socio-Environmental Baseline and Ongoing Impact Assessment

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **2.1** | | **Environmental and Social Impact Assessment and Management** | **2.1** | | **Socio-Environmental Baseline and Ongoing Impact Assessment** | |
| | | | ***2.1.1*** | | ***Site Selection for Mineral Processing Projects*** | *New Section* |
| | | | 2.1.1.1 | | For a proposed mineral processing project proposed after [Date-of-publication-of-Standard-V.2.0], the ENTITY has a system in place to ensure that:<br><br>a. The avoidance of adverse impacts to soils is considered and documented by competent professionals in the selection of the project location;<br><br>b. The potential to locate the project on an existing brownfield site is evaluated; and<br><br>c. If the project is developed on a greenfield site, a rationale is documented, and made and maintained publicly accessible. | *New requirement resulting from the explicit inclusion of mineral processing facilities in this new version of the Standard, given the higher potential for processing sites to lead to impacts on soils due to air emissions and their deposition.* |
| | | | ***2.1.2*** | | ***Preliminary ESIA Screening for Exploration Projects Proposed after [Date-of-publication-of-Standard-V.2.0]*** | *New Section* |

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| | | | 2.1.2.1 | Critical | For exploration project proposed after [Date-of-publication-of-Standard-V.2.0], a preliminary screening process is undertaken and documented by competent professionals to determine the likelihood of the project to have adverse social and/or environmental impacts and risks that warrant undertaking an initial assessment of social and environmental impacts. The screening process:<br>a. Starts after an exploration plan for the project has been sufficiently developed (see Annex 2.1-A) , and is completed prior to starting proposed exploration activities;<br>b. Is conducted in collaboration with potentially affected rights-holders and stakeholders (as identified in Chapter 1.2-Section 1.2.1 and Chapter 1.3-Section 1.3.2), and, if potentially affected Indigenous rights-holders are identified, in collaboration with them in accordance with Chapter 2.2;<br>c. Is repeated or updated should the exploration plan be significantly revised or new information of a material nature regarding the project area of influence emerges;<br>d. Includes identification of all potential adverse environmental and social impacts and risks likely to be associated with the proposed exploration project; (see Annex 2.1-B for list of potential issues to scope);<br>e. Determines which potential impacts and risks are likely to be significant, or whether proposed activities are likely to have minimal or no significant impacts, using a credible methodology;<br>f. Includes a rationale as to why an initial assessment of social and environmental impacts is or is not necessary for the proposed exploration project ; and<br>g. The rationale is made and maintained publicly accessible, and is proactively shared with affected rights-holders and stakeholders , in accordance with Section 1.2.3 . | *New requirement reflecting Standard's intent to cover expectations from exploration to post-closure.* |
| ***2.1.1*** | | ***General Requirements*** | ***2.1.3*** | | ***Initial Planning for Projects and Modifications Proposed after June 2018*** | *Revised heading* |
| 2.1.1.1 | | An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project. | 2.1.3.1 | Critical | For an exploration project proposed after June 2018 where preliminary screening required in 2.1.2 indicated that an initial impact assessment was necessary, or for a mining or mineral processing project proposed after June 2018, or for a major modification to existing operations proposed after June 2018, an initial socio-environmental impact assessment process is conducted and documented by competent professionals. This process: | *Combines former 2.1.1.1 and former 2.1.1.2.*<br><br>*b. is a new sub-requirement that requires stakeholder mapping prior to scoping (i.e. prior to exploration)*<br><br>*Proposed to be critical as* |

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| 2.1.1.2 | | To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken. | | | a. Is completed prior to starting any of the proposed site-disturbing activities;<br><br>b. Identifies the role of affected rights holders and stakeholders in collaborative scoping, baseline data collection, risk and impact assessment, and development, implementation, and monitoring and evaluation of management plans; and<br><br>c. Is undertaken again should the plans for a proposed project or proposed major modification be significantly revised that will result in significant new, or changes to existing, risks or adverse impacts. | *failure to meet would likely in result in immediate harm* |
| ***2.1.2*** | | ***Provision of Preliminary Information*** | | | | *Deleted heading* |
| 2.1.2.1 | | Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project. | 2.1.3.2 | | For such as site (see 2.1.3.1) the Entity has systems in place to ensure that, prior to the implementation of the initial socio-environmental impact assessment process:<br><br>a. It organizes and delivers wide, public announcement of this initial impact assessment process, including details on the proposed location, and nature and duration of the project/modification and related activities, using a range of diverse and appropriate communication channels and languages;<br><br>b. It preemptively and proactively shares all relevant information related to this initial impact assessment process, including details on the proposed location, and nature and duration of the project/modification and related activities, with affected rights holders and stakeholders, in accordance with Section 1.2.3; and<br><br>c. It allocates financial and staffing resources to conduct this initial impact assessment process in accordance with the subsequent Sections and requirements of this chapter. | *Content expands on former 2.1.2.1, including more proactive information sharing (sub-requirement b) and adding specification concerning resourcing (Standard-wide addition) for assessments and management plans (sub-requirement c).*<br><br>*b. also draws on former 2.1.1.3.*<br><br>*c. also draws on 2018 Standard guidance.* |
| 2.1.1.3 | | The ESIA shall be carried out in accordance with publicly available, documented procedures. | | | | |
| ***2.1.3*** | | ***Scoping*** | ***2.1.4*** | | ***Initial Scoping for Projects and Modifications Proposed after June 2018*** | *Revised heading* |
| 2.1.3.1 | Critical | The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA. | 2.1.4.1 | Critical | For a project or modification proposed after June 2018 (see 2.1.3.1), a process is undertaken by competent professionals to define the scope of the impact assessment in terms of the environmental and social risks and impacts to be considered, and the appropriate temporal and spatial boundaries. This scoping process:<br>a. Includes description of the proposed project/modification, | *Expands upon scoping expectations detailed in forrmer 2.1.3.1, 2.1.3.2, and 2.1.3.4.*<br><br>*d. adds in language requiring explicit consideration of* |

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| 2.1.3.2 | | During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as "stakeholders") who may be interested in and/or affected by the proposed project. | | | including the geographic location, nature and duration of all on-site and off-site mining-related activities, including those at associated facilities;<br>b. Builds on the results of the Stakeholder Mapping and Analysis required in Section 1.2.1, and the Scoping of rights holders required in Section 1.3.2, to identify rights holders and stakeholders who may be directly or indirectly affected by the proposed project/modifications, including potentially affected Indigenous Peoples;<br>c. Includes spatial identification and mapping of the area of influence of the project/modification, considering direct, indirect and cumulative impacts and risks;<br>d. Includes a review of existing environmental and social baseline data for the project/modification's area of influence;<br>e. Includes a determination of the applicability of all the potential social and environmental issues listed in Annex 2.1-B, taking into consideration the preferences of affected rights-holders and stakeholders for post-closure end-uses of potentially affected areas; and<br>f. Includes a preliminary overview of potential environmental and social risks and impacts, including documentation of which are likely to occur at the different stages of the proposed project/modification life cycle, from exploration and pre-construction through concurrent reclamation, decommissioning, closure, and post-closure, where applicable. | *baseline data*<br><br>*e. expands on former 2.1.3.4.a, so that a comprehensive approach is taken to identifying potential impacts. Added reference to affected stakeholders/rights holders preferred post-closure end uses of the project area, as this will also influence what might be deemed a potential impact.*<br><br>*f. adds specifics to former 2.1.3.4.a* |
| 2.1.3.4 | | Scoping shall result in the identification of:<br><br>a. Potentially significant environmental and social impacts of the proposed project;<br><br>b. Alternative project designs to avoid significant adverse impacts;<br><br>c. Other actions to mitigate identified adverse impacts; and<br><br>d. Additional information and data needed to understand and assess the potential impacts. | | | | |

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| 2.1.3.3 | | Scoping shall include the consideration of:<br><br>a. Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure;<br><br>b. Direct, indirect and cumulative impacts; and<br><br>c. Potential impacts of extreme events. | 2.1.4.2 | | The scoping process also includes:<br><br>a. Consideration of whether the potential impacts are adverse or positive, direct or indirect, or if the project may contribute to cumulative impacts in its area of influence;<br><br>b. Consideration of differential impacts and risks of the proposed project/modification on rights holders and stakeholders of different genders, ages, ethnicities, and on potentially underserved and/or marginalized people from affected communities; and<br><br>c. Consideration of climate change within the life of the proposed project/modification (or longer, if relevant to post-closure risks related to waste disposal facilities, water and biodiversity management) , including whether increasing temperatures and changing location, frequency, duration or severity of weather, fire or other physical events, might affect the scope or magnitude of project/modification-related social and environmental impacts or risks. | *Expands upon former 2.1.3.3; made critical as the former critical requirement (2.1.3.1) that asked for scoping and was critical.*<br><br>*a. adds more explicit consideration of positive impacts*<br><br>*b. requires consideration of differential impacts on a wide range of stakeholders than listed explicitly in former 2.1.3.3.*<br><br>*c. Expands on 'extreme events' mentioned in former 2.1.3.3.c (drawing on v1.0 guidance) including a framing that is focused on climate-induced risks.* |
| 2.1.3.4 | | Scoping shall result in the identification of:<br><br>a. Potentially significant environmental and social impacts of the proposed project;<br><br>b. Alternative project designs to avoid significant adverse impacts;<br><br>c. Other actions to mitigate identified adverse impacts; and<br><br>d. Additional information and data needed to understand and assess the potential impacts. | 2.1.4.3 | | For a project or modification proposed after June 2018 (see 2.1.3.1), as an outcome of the scoping process, a draft scoping report (or equivalent) is prepared by competent professionals. This draft report includes:<br>a. The potential significant environmental and social risks and impacts, and their associated receptors , that require further assessment;<br>b. Any existing social and environmental baseline data relevant to the area of influence of the proposed project/modification;<br>c. A data gap analysis and plan (or equivalent), with timelines, to collect additional baseline data and conduct any additional studies or investigations needed to further understand and assess the potential impacts and risks;<br>d. The technically feasible alternatives to avoid or prevent significant adverse risks and/or impacts , avoiding a priori assumptions and judgments about alternatives;<br>e. Options to mitigate significant adverse risks and impacts in a manner that aligns with the mitigation hierarchy and aligns, to the extent possible, with affected rights-holders' and | *a. draws on former 2.1.3.4.d*<br><br>*b. adds in language requiring explicit consideration of baseline data*<br><br>*c. expands on former 2.1.3.4.d which only asks for gaps to be identified, not for a plan to address them*<br><br>*d. expands on former 2.1.3.4.a*<br><br>*e. expands on former 2.1.3.4.c*<br><br>*f. new sub-requirement*<br><br>*g. to j. align with the* |

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| 2.1.2.2 | | Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:<br><br>a. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities;<br><br>b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts;<br><br>c. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and<br><br>d. Contact details for the person or team responsible for management of the ESIA. | | | stakeholders' preferences for post-closure end-uses of potentially affected areas ; and<br>f. Options to mitigate and/or adapt to climate change effects identified in 2.1.4.2.c;<br>g. The description of the main steps of the initial impact assessment process that will be carried out, the estimated timeline;<br>h. The range of opportunities for affected rights-holders and stakeholders to participate in consultation and collaborative decision-making during the initial impact assessment process, in accordance with Chapter 1.2;<br>i. The contact details for the person or team responsible for the management of the initial impact assessment process; and<br>j. This draft report is made and maintained publicly accessible, in relevant languages . | *expectations of former 2.1.2.2, however they refers to the publication of a draft report, rather than simply the final report (as addressed in former 2.1.2.2.).*<br><br>*g. and h.. expand on former 2.1.2.2.c*<br><br>*i. is former 2.1.2.2.c*<br><br>*j. is from the requirement intro for former 2.1.2.2* |
| 2.1.2.2 | | Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:<br><br>a. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities;<br><br>b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts;<br><br>c. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and<br><br>d. Contact details for the person or team responsible for management of the ESIA. | 2.1.4.4 | | Once affected rights holders and communities, and relevant stakeholders have provided their comments on this draft report (see 2.1.8), a finalized scoping report is prepared by competent professionals and includes:<br><br>a. A summary of the public consultation process that was followed;<br><br>b. A summary of input received from affected rights holders and communities, and relevant stakeholders; and<br><br>c. A summary of the feedback provided to them by the ENTITY, and how the Entity took their input into consideration to revise the report (or if not, the reason why). | *a. draws on former 2.1.2.2.c*<br><br>*b. and c. expand upon former 2.1.9.5 and 2.1.10.2 (although the latter does not specify this obligation as it relates to scoping specifically)* |
| 2.1.9.5 | | The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments. | | | | |

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| 2.1.10.2. | | The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account. | | | | |
| ***2.1.4*** | | ***ESIA Data Collection*** | ***2.1.5*** | | ***Initial Baseline Data Collection*** | *New heading name* |
| 2.1.4.1 | | Baseline data describing the prevailing environmental, social, economic and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project. | 2.1.5.1 | | For project or modification proposed after June 2018 (see 2.1.3.1), and building on 2.1.4:<br>a. Baseline data describing the prevailing environmental and social context in which the project/operation takes place are collected by competent professionals ;<br>b. They are collected using credible methods ;<br>c. They are collected with an appropriate level of detail and disaggregation to understand and assess the potential risks and impacts from the proposed project/modification; and<br>d. Any additional studies identified during scoping as necessary (see 2.1.4.3) are carried out by competent professionals. | *Expands upon former 2.1.4.1 and 2.1.4.2, adding specificity re: maximum time period for update.* |
| 2.1.4.2 | | Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA. | | | | |
| ***2.1.5*** | | ***ESIA Impact Analysis*** | ***2.1.6*** | | ***Initial Risk and Impact Assessment*** | *New heading name, more consisted with other chapters in the Standard* |

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| 2.1.5.1 | | The operating company shall:<br><br>a. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping;<br><br>b. Determine the significance of the predicted impacts;<br><br>c. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the avoidance of impacts through consideration of alternative project designs; and<br><br>d. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders. | 2.1.6.1 | | For project or modification proposed after June 2018 (see 2.1.3.1), and building on 2.1.4 and 2.1.5, a risk and impact assessment, appropriate to the nature and scale of the proposed project/modification and commensurate with the level of environmental and social risks and impacts. This risk and impact assessment:<br>a. Is carried out and documented by competent professionals;<br>b. Evaluates and predicts in detail the characteristics of the significant environmental and social risks and impacts identified during scoping ;<br>c. Includes differential risks and impacts on rights-holders and stakeholders of different genders, ages, ethnicities, and on potentially underserved and/or marginalized people;<br>d. Defines the criteria used to identify levels of significance of risks and impacts;<br>e. Addresses adaptation to climate change effects identified in 2.1.4.2.c ; and<br>f. Evaluates options to optimize potential positive impacts. | *Expands on expectations for risk and impact assessment in 2.1.5.1*<br><br>*c. is new*<br>*e. new sub-requirement*<br>*f. makes need to address positive benefits more explicit* |
| | | | 2.1.6.2 | | This risk and impact assessment evaluates options and measures to address potentially significant social and environmental risks and impacts in a manner that aligns with the mitigation hierarchy as follows :<br>a. By first evaluating the technically feasible alternatives to avoid/prevent significant adverse risks and impacts , avoiding a priori assumptions and judgements about alternatives;<br>b. Then, where avoidance or prevention is not possible, by evaluating options to minimize predicted significant adverse risks and impacts;<br>c. As a last resort, where minimization is not possible, by evaluating strategies available to restore conditions after impacts occur.<br>d. The assessment identifies significant adverse residual impacts that cannot be avoided/prevented or minimized or restored, evaluates whether an offset or other compensatory measures appropriate to address those will be required, and documents the nature and scope of such measures, as well as the viability of implementation effectiveness. | *Expands on concept of mitigation hierarchy in former 2.1.5.1.c*<br><br>*d. is from former 2.1.5.1.d* |
| ***2.1.6*** | | ***ESIA Report*** | | | | |

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| 2.1.6.1 | | The operating company shall prepare an ESIA report that includes, at minimum:<br><br>a. A description of the proposed mining project;<br><br>b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts;<br><br>c. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts;<br><br>d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and<br><br>e. Names and affiliations of ESIA authors and others involved in technical studies. | 2.1.6.3 | Critical | As an outcome of this risk and impact assessment, a draft report (or equivalent) is prepared by competent professionals. This report includes:<br>a. A description of the proposed project/modification;<br>b. A spatial delineation of the project/modification's area of influence, considering all significant risks and impacts;<br>c. A description of baseline conditions and results of additional evaluations and studies;<br>d. Identification and detailed description of the environmental and social risks, and adverse and positive direct, indirect, and cumulative impacts likely to result from the proposed project/modification;<br>e. The criteria used to identify levels of significance of risks and impacts, and identification of the significant risks and potential adverse impacts, as well as significant opportunities for positive impacts;<br>f. Description of the alternatives considered to avoid/prevent all significant adverse impacts from the project, and alternatives to optimize positive impacts, along with a detailed rationale for recommending or rejecting certain alternatives;<br>g. Recommended measures to avoid/prevent, minimize, and restore significant adverse impacts;<br>h. Recommended measures to offset and/or compensate for residual impacts;<br>i. Recommended measures to optimize positive impacts;<br>j. Description of any assumptions, uncertainties, gaps in knowledge, or limitations related to the project description, baseline data, alternatives assessment, impact and risk assessment, recommended mitigation measures, and associated stakeholder engagement process;<br>k. Names and affiliations of the authors of the risk and impact assessment, and any others involved in technical studies; and<br>l. Appendices containing detailed and complete information on baseline conditions, evaluations and studies . | *Builds on former 2.1.6.1*<br><br>*e. and i. add more explicit reference to the need to evaluate positive impacts*<br><br>*f. asks that reasons for rejecting alternatives be made explicit*<br><br>*j. and l. offer more specificity concerning expectations for ESIA reporting; to align with international best practice and guidance* |

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| 2.1.6.1 | | The operating company shall prepare an ESIA report that includes, at minimum:<br><br>a. A description of the proposed mining project;<br><br>b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts;<br><br>c. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts;<br><br>d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and<br><br>e. Names and affiliations of ESIA authors and others involved in technical studies. | 2.1.6.4 | | Once affected rights holders and communities, and relevant stakeholders, have provided their comments on this draft report (see 2.1.8), a finalized report is prepared by competent professionals and includes:<br><br>a. A summary of the public consultation process that was followed;<br><br>b. A summary of input received from affected rights holders and communities, and relevant stakeholders; and<br><br>c. A summary of the feedback provided to them by the ENTITY, and how the Entity took their input into consideration to revise the report (or if not, the reason why). | *Adaptation of former 2.1.6.1.d and 2.1.9.5 (atlhough this requirement only states that the ESIA must contain record of responses, whereas 2.1.5.8 more specifically asks that these responses be given to stakeholders themselves).* |
| 2.1.9.5 | | The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments. | | | | |
| ***2.1.7*** | | ***Environmental and Social Management System (ESMS)*** | ***2.1.7*** | | ***Integration into Management Plans*** | *Revised heading* |
| 2.1.7.1 | | The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine. | 2.1.7.1 | | For all projects/operations, the ENTITY has systems in place to ensure that relevant management plans are developed, documented, and implemented by competent professionals to address all significant social and environmental risks and impacts identified during the initial (see Section 2.1.6) and ongoing (see Section 2.1.11) impact assessment process. | *Incorporates content from former 2.1.7.1 and 2.1.7.2.* |
| 2.1.7.2 | | An environmental and social management plan (or its equivalent) shall be developed that, at minimum:<br><br>a. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process;<br><br>b. Assigns personnel responsible for implementation of various elements of the plan; and<br><br>c. Includes estimates for the resources needed to implement the plan. | | | | |

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| | | | 2.1.7.2 | | For a proposed exploration project where preliminary screening required in 2.1.2 indicated that an initial socio-environmental impact assessment was not necessary, a socio-environmental management plan (or equivalent) is developed by competent professionals. The plan:<br>a. Outlines the specific mitigation measures that will be carried out to address the adverse social and environmental impacts and risks, in a manner that strictly aligns with the mitigation hierarchy;<br>b. Outlines the specific measures that will be taken to optimize positive social and environmental impacts;<br>c. Includes appropriate time-bound performance indicators , and monitoring measures to enable evaluation of the effectiveness of mitigation measures, and of measures taken to optimize positive impacts, over time ;<br>d. Identifies the role of affected rights-holders and stakeholders in the collaborative development, implementation, and monitoring and evaluation of the plan;<br>e. Assigns implementation of measures to responsible staff with adequate skills and expertise;<br>f. Assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>g. Has clearly-defined timelines and an implementation schedule in place that specifies the expected outcomes for affected rights-holders and stakeholders;<br>h. Maintains estimates of human resources and budget required; and<br>i. Includes a financing plan to ensure that funding is available for the effective implementation of the plan. | *New requirement to clarify that even when a full ESIA is not required for exploration projects, a management plan (or equivalent) to address risks is still necessary.* |
| ***2.1.9*** | | ***Stakeholder Consultation and Participation in ESIA and Environmental and Social Monitoring*** | ***2.1.8*** | | ***Meaningful Engagement with Stakeholders*** | *New heading name* |

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| 2.1.2.2 | | Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the mining project is proposed to take place. The report shall provide:<br><br>a. A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities;<br><br>b. The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts;<br><br>c. A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and<br><br>d. Contact details for the person or team responsible for management of the ESIA. | 2.1.8.1 | | For a project or modification proposed after June 2018 (see 2.1.3.1), and in accordance with Chapter 1.2, and as per 2.1.3, the Entity has a system in place to ensure that affected rights holders and communities, and relevant stakeholderse:<br><br>a. Are preemptively provided with relevant and comprehensive information, in accordance with Section 1.2.3, about the main steps of the initial impact assessment process that will be carried out, the estimated timeline, and the range of opportunities for them to participate in consultation and collaborative decision-making during the initial impact assessment process;<br><br>b. Are included in consultations and collaborative decision-making, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people; and<br><br>c. Are provided with the final reports from the Scoping (2.1.4.7) and the impact assessment processes (2.1.6.8), in accordance with Section 1.2.3 | *a. draws on former 2.1.2.2.c (info to be provided to stakeholders prior to the start of the ESIA process)*<br><br>*b. expands on expectations concerning the quality of engagement, per Standard-wide changes.*<br><br>*c. is similar in intent o 2.1.10.5, requiring that information not only be accessible (as per requirement 2.1.12.1), but also that stakeholders are informed of/provided with the reports*<br><br>*Also draws generally on intent of former 2.1.9.1, but as it applies to the scoping / initial ESIA process* |
| 2.1.10.5 | | The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means. | | | | |
| 2.1.9.1 | | As part of the **ESIA process**, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on:<br><br>a. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3);<br><br>b. Methodologies for the collection of environmental and social baseline data (see 2.1.4);<br><br>c. The findings of environmental and social studies relevant to the conclusions and recommendations of the ESIA (see 2.1.5.1.a and b);<br><br>d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c);<br><br>e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and<br><br>f. The final conclusions and recommendations of the ESIA (see 2.1.6.1). | 2.1.8.2 | | For a project or modification proposed after June 2018 (see 2.1.3.1), and in accordance with Chapter 1.2, the Entity has a system in place to ensure that affected rights holders and communities, and relevant stakeholders, are consulted and can review and comment, at least 60 days before reports and/or processes are finalized , on:<br><br>a. The issues, risks, and impacts to be considered in the scoping required in 2.1.4, as well as the draft and finalized versions of the scoping report also required in 2.1.4;<br><br>b. Methodologies for the collection of environmental and social baseline data required in 2.1.5; and<br><br>c. The findings of the environmental and social risk and impact assessment, and the recommended mitigation measures, required in 2.1.6, as well as the draft and finalized versions of the initial impact assessment report also required in 2.1.6. | *Incorporates content from former 2.1.9.1 and 2.1.9.2* |

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| 2.1.9.2 | | The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process. | 2.1.8.3 | | In accordance with Chapter 1.2, the Entity has a system in place to ensure that affected rights holders and communities:<br><br>a. If necessary, are provided with resources for capacity building and training to enable meaningful stakeholder engagement in the consultation and review processes in 2.1.8.2;<br><br>b. Are provided with the opportunity to propose independent experts to provide input to the Entity on the initial impact assessment scoping process, the draft and finalized versions of the scoping report, and the baseline data collection; and<br><br>c. Are provided with the opportunity to propose independent experts to provide input to the Entity on the risk and impact assessment, and the draft and finalized versions of the initial impact assessment report. | *a. adds builds on former 2.1.9.2 which requires the entity to 'facilitate' stakeholder participation in the ESIA process.*<br><br>*b.and c. are new sub-requirements* |
| | | | ***2.1.9*** | | ***Traditional Knowledge*** | *New heading* |
| | | | 2.1.9.1 | | For a project or modification proposed after June 2018 (see 2.1.3.1), the Entity has systems in place to ensure that traditional knowledge, and especially traditional ecological knowledge, of local affected communities, and Indigenous rights holders if applicable, is integrated into:<br><br>a. The initial impact assessment scoping process, and the draft and finalized versions of the scoping report (See Section 2.1.4);<br><br>b. Initial baseline data collection (see Section 2.1.5); and<br><br>c. The initial risk and impact assessment, and the draft and finalized versions of the initial impact assessment report (see Section 2.1.6). | *New requirement - traditional knowledge previously only addressed in former chapter 3.7 on Cultural Heritage.* |

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| | | | 2.1.9.2 | | For all projects/operations, the Entity has systems in place to ensure that traditional knowledge, and especially traditional ecological knowledge, of local affected communities, and Indigenous rights holders if applicable, is also integrated into:<br><br>a. Relevant monitoring and evaluation processes;<br><br>b. Relevant review and continuous improvement processes; and<br><br>c. The ongoing socio-environmental impact assessment process required in 2.1.11. | *See above.* |
| ***2.1.8*** | | ***Environmental and Social Impact Monitoring*** | ***2.1.10*** | | ***Monitoring and Evaluation*** | *Revised heading* |
| 2.1.8.3 | | If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project. | 2.1.10.1 | | For all projects/operations, and if requested by relevant stakeholders, the entity facilitates the independent monitoring and evaluation of key risks and/or impacts indicators by external individuals who have received appropriate site-specific health and safety orientation and training. | *This aligns with former 2.1.8.3.* |
| | | | ***2.1.11*** | | ***Ongoing Impact Assessment and Continuous Improvement*** | *Section added for consistency with Standard-wide change.* |
| 2.1.7.1 | | The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine. | 2.1.11.1 | | For all projects/operations, the ENTITY has an ongoing socio-environmental impact assessment process in place. This process ensures that, at least annually but without undue delay after a significant change, a review of the applicability of all the potential social and environmental issues listed in Annex 2.1-B to the project/operation is conducted and documented by competent professionals, taking into consideration:<br><br>a. Any minor changes to the operation;<br><br>b. Any changes in the operating context that have occurred in the past year; and<br><br>c. Any updated knowledge related to climate change, including increased frequency, duration, or severity of weather events in the operating area. | *Draws on intent of former 2.1.7.1 and 2.1.7.3 but expands upon expectations therein and specifies that risks should be reviewed annually (note: other IRMA chapters already require ongoing, annual updates of risk assessments, therefore this may simply mean the consolidation of these various assessments).* |
| 2.1.7.3 | | The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information. | | | | |

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| | | | 2.1.11.2 | | For all projects/operations, the review required in 2.1.11.1 is informed by:<br><br>a. The preferences of affected rights holders and stakeholders for post-closure end-uses of potentially affected areas;<br><br>b. Information and feedback obtained through relevant grievance mechanisms and engagement processes with rights holders and stakeholders; and<br><br>c. Results and outcomes of relevant monitoring and evaluation processes. | *New. Aligns with the impact assessment process in the rest of the chapter, and expectations align with the Continuing Improvement requirements in other chapters.* |
| 2.1.7.1 | | The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine. | 2.1.11.3 | | For all projects/operations, the ongoing socio-environmental impact assessment process required in 2.1.11.1 ensures that, whenever new social or environmental risks and/or impacts are identified, and/or whenever there is the potential that the magnitude, duration, or probability of already-identified social or environmental risks and impacts have changed:<br><br>a. Direct, indirect, and cumulative risks and impacts are further assessed by competent professionals, using a credible methodology, to determine if they are significant enough to require new or revised avoidance, mitigation or compensation measures;<br><br>b. If necessary, baseline/background are collected and documented by competent professionals to inform the evaluation process; and<br><br>c. If necessary, additional studies are conducted and documented by competent professionals to inform the evaluation process. | *Clarifies intent of former 2.1.7.1 and 2.1.7.3 - details added to expand on the system/process to manage social and environmental risks in former 2.1.7.1, and what constitutes 'when necessary' in former 2.1.7.3. Also provides clarity on expectations around the triggers for collecting new information to inform the management of environmental and social risks throughout the life of the mine/operation.* |
| 2.1.7.3 | | The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information. | | | | |

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| 2.1.7.3 | | The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information. | 2.1.11.4 | | For all projects/operations, the ongoing socio-environmental impact assessment process required in 2.1.11.1 ensures that, if new/changing risks and/or impacts are deemed significant (see 2.1.11.3.a):<br>a. Mitigation strategies are developed and/or updated, and documented by competent professionals;<br>b. They are designed in collaboration with affected rights-holders and stakeholders;<br>c. They are designed to strictly align with the mitigation hierarchy;<br>d. They are integrated into relevant management plans; and<br>e. They are integrated into monitoring and evaluation, and continuous improvement programs . | *Clarifies intent of former 2.1.7.1 and 2.1.7.3 - details added to expand on what constitutes 'when necessary' in former 2.1.7.3 and also expectations around what it means to 'revise' or 'update' (drawing on v1.0 guidance).* |
| 2.1.7.1 | | The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine. | 2.1.11.5 | | For all projects/operations, the social baseline data describing the prevailing social context in which the project/operation takes place is updated and documented at least every five years:<br><br>a. By competent professionals, using credible methods;<br><br>b. With an appropriate level of detail and disaggregation to understand and assess the potential risks and impacts from the proposed project/modification; and<br><br>c. In collaboration with affected rights holders and stakeholders. | *New content, but draws on intent of former 2.1.7.1, elaborating on what data are necessary to inform assessment of risks/impacts over the life of the mine/operation.* |
| | | | ***2.1.12*** | | ***Information-Sharing and Public Reporting*** | *New heading name* |
| 2.1.10.1 | | The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner. | 2.1.12.1 | | For project or modification proposed after June 2018 (see 2.1.3.1), and with due regard for rights holders' and stakeholders' safety, data privacy, and for security concerns, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br><br>a. The full versions of the initial impact assessment report, including an explanation of the assessment methodology and a list of the risks and impacts identified;<br><br>b. Any supporting data and analyses; and<br><br>c. An anonymized version of the record of stakeholder comments (see Section 2.1.8) and the Entity's responses, including how each comment was taken into account (and if not, why). | *a. and b. from former 2.1.10.1*<br><br>*c. from former 2.1.10.2* |
| 2.1.10.2 | | The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account. | | | | |

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| | | | 2.1.12.2 | | For all projects/operations, at least annually and with due regard for rights holders' and stakeholders' safety, data privacy, and for security concerns, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br><br>a. A summary of the outcomes and key findings of the ongoing socio-environmental impact assessment process (see Section 2.1.11);<br><br>b. A summary of, and key findings from, the updated baseline/background data and any additional studies carried out, for all relevant social and environmental issues; and<br><br>c. A summary of the mitigation strategies developed or updated as per 2.1.11.4 to address new/changing risks and/or impacts identified. | *New. Aligns with disclosure requirements for the initial impact assessment (2.1.12.1), as well as requirements in other chapters.* |
| 2.1.8.1 | | As part of the ESMS, the operating company shall establish a program to monitor:<br><br>a. The significant environmental and social impacts identified during or after the ESIA process; and<br><br>b. The effectiveness of mitigation measures implemented to address environmental and social impacts. | | | | *Deleted - redundant with requirements in other Chapters.* |
| 2.1.8.2 | | The monitoring program shall be designed and carried out by competent professionals. | | | | *Deleted - redundant with requirements in other Chapters.* |
| 2.1.9.3 | | The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and **social monitoring** program. | | | | *Collaborative monitoring is included across social chapters, explicitly* |
| 2.1.9.4 | | The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program. | | | | *Deleted - redundant with requirements in other Chapters.* |
| 2.1.10.3 | | The environmental and social management plan shall be made available to stakeholders upon request. | | | | *Deleted - redundant with requirements in other Chapters.* |
| 2.1.10.4 | | Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available. | | | | *Deleted - redundant with requirements in other Chapters.* |

# Chapter 2.2 Indigenous Peoples and Free, Prior, and Informed Consent (FPIC)

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **2.2** | | **Free, Prior and Informed Consent (FPIC)** | **2.2** | | **Indigenous Peoples and Free, Prior and Informed Consent (FPIC)** | |
| ***2.2.1*** | | ***Policy Commitment*** | ***2.2.1*** | | ***Formalized Policy*** | |
| 2.2.1.1 | | The operating company shall have a publicly available policy that includes a statement of the company's respect for indigenous peoples' rights, as set out in the United Nations Declaration on the Rights of Indigenous Peoples. | 2.2.1.1 | | 2.2.1.1 The ENTITY has a formal policy in place that:<br>a. Commits to respect Indigenous Peoples' rights related to lands, territories and resources, self-determination, and to Free, Prior and Informed Consent (FPIC) as set out in international law and policy frameworks including those affirmed in the ILO Indigenous and Tribal Peoples Convention and the UN Declaration on the Rights of Indigenous Peoples ;<br>b. Sets clear expectations for how personnel, contractors, and other relevant parties linked to the site and its associated facilities shall respect these fundamental rights;<br>c. Is approved at the top management level of the ENTITY;<br>d. Is proactively communicated to personnel, contractors, and other relevant parties linked to the site and its associated facilities;<br>e. Is publicly accessible; and<br>f. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the site. | *Expands on former 2.2.1.1 in alignment with policy expectations made throughout the Standard.* |
| | | | ***2.2.2*** | | ***Uncontacted Indigenous Peoples or in Initial Contact*** | |
| | | | 2.2.1.1 | Critical | If Uncontacted Indigenous Peoples or Indigenous Peoples Living in Voluntary Isolation or in Initial Contact have been identified (as per 1.3.2.3) as being potentially present in the area of influence and/or affected by the site and its associated facilities, the ENTITY does not initiate or make contact with any of them. | *Content previously part of Chapter 3.7 (cultural heritage - 3.7.5.5). Now critical requirement as a non-conformity would risk immediate harm.* |

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| | | | 2.2.2.2 | Critical | If Uncontacted Indigenous Peoples or Indigenous Peoples Living in Voluntary Isolation or in Initial Contact have been identified (as per 1.3.2.3) as being potentially present in the area of influence and/or affected by the site and its associated facilities:<br>a. The ENTITY consults with relevant Indigenous Peoples' organizations or bodies if they exist , and with external experts , to determine if the ENTITY's current, past, or proposed mining-related activities are affecting or may affect the rights or territories of those Uncontacted Indigenous Peoples or Indigenous Peoples Living in Voluntary Isolation or in Initial Contact ;<br>b. If existing impacts on their rights or territories are identified, the ENTITY immediately halts all relevant activities and removes all infrastructure impacting their rights or territories, and it consults with representative bodies for Indigenous Peoples, and external experts, to determine the appropriate remedial measures to rehabilitate impacted areas and safeguard the health, safety and existence of the affected peoples, and implements their recommendations;<br>c. If past impacts on their rights or territories are identified (and are no longer occurring), the ENTITY consults with representative bodies for Indigenous Peoples, and external experts, to determine the appropriate remedial measures to rehabilitate impacted areas and safeguard the health, safety and existence of the affected peoples (which may in some cases be the cessation of operations and/or removal of infrastructure), and implements their recommendations; and<br>d. If proposed activities may affect their rights or territories, the ENTITY redesigns the project to avoid all such impacts, or, if avoidance is not possible, ceases to pursue the proposed activities. | *Added to expand upon former requirement 3.7.5.5 (in cultural heritage chapter) relating to Indigenous Peoples in voluntary isolation or initial contact. Draws on guidance from former 3.7.5.5. Now critical requirement as a non-conformity would risk immediate harm.* |
| ***2.2.2*** | | ***General Requirements*** | ***2.2.3*** | | ***Review and Evaluation of State Obligations*** | |

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| 2.2.2.1 | | The operating company shall conduct due diligence to determine if the host government conducted an adequate consultation process aimed at obtaining indigenous peoples' informed consent prior to granting access to mineral resources. The key findings of due diligence assessments shall be made publicly available and shall include the company's justification for proceeding with a project if the State failed to fulfill its consultation and/or consent duties. | 2.2.3.1 | | If Indigenous Peoples whose rights or interests have been or may be directly or indirectly affected by the site and its associated facilities have been identified as per 1.2.1.1. and 1.3.2.3, a legal review process is conducted by competent professionals to understand and review the country of operation's laws and processes that pertain to Indigenous Peoples' rights, through:<br>a. Documenting all country of operation's laws and regulations related to the identification and/or official recognition of Indigenous Peoples, to the recognition of their rights, and to the protection of those rights;<br>b. Documenting all country of operation's laws and regulations pertaining to Free, Prior, and Informed Consent (or similar ) and State-led FPIC and/or consultation processes associated with mineral development;<br>c. If such laws or processes are in place (b.), summarizing the State's implementation of the process/es followed when granting access to the mineral resources or lands that are proposed (or being used) by the ENTITY for the site and its associated facilities;<br>d. Evaluating to what extent the content and implementation of those laws and processes (b. and c.) comply with international Indigenous rights norms, and with relevant regional and national jurisprudence; and<br>e. Documenting whether the country of operation's laws (or their absence), or implementation of its laws (or lack of implementation), have been challenged or critiqued by Indigenous Peoples' organizations or communities, or others as not being aligned with international law and/or internationally-recognized human rights including those affirmed in the ILO Indigenous and Tribal Peoples Convention and the UN Declaration on the Rights of Indigenous Peoples. | *Expands on former 2.2.1.1 by asking for a more in-depth review of the host country legal context relating to FPIC and any relevant challenges made to state-led FPIC proceedings (or lack thereof) within that context.* |
| | | | 2.2.3.2 | | The ENTITY makes and maintains publicly accessible, and in appropriate Indigenous language(s), key findings of this legal review process. | *Adapted from former 2.2.2.1.* |

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| | | | 2.2.3.3 | | If findings of this review process reveal that the country of operation's government failed to fulfill its duty to obtain the FPIC of affected Indigenous Peoples prior to granting access to mineral resources or lands for mineral development (proposed or already in operation), or reveal that the FPIC process did not conform with all IRMA FPIC-related requirements and/or FPIC was not given for the full range of relevant activities and associated facilities, but the ENTITY still decides to proceed/continue with project/operation:<br>a. The ENTITY makes and maintains publicly accessible, and in appropriate Indigenous language(s), a justification for proceeding/continuing with the project/operation;<br>b. The ENTITY ensures that all affected Indigenous Peoples and their advisors (where applicable) are provided with such justification to proceed/continue, in accordance with requirement 2.2.4.2; and<br>c. If the project/operation is proposed to become operational after June 2018, the ENTITY collaborates with affected Indigenous Peoples to conduct an FPIC process and respect the right to FPIC for the project/operation, in accordance with Section 2.2.6 ; and<br>d. If the operation became operational before June 2018, the ENTITY collaborates with affected Indigenous Peoples to provide remedy for the impacts related to those activities implemented without FPIC, in accordance with Section 2.2.5. | *Expands upon former 2.2.2.1 by detailing additional expectations about entity actions if gov't did not obtain FPIC prior to granting concession.*<br><br>*c. draws on former 2.2.2.1 guidance notes where intent to collaborate with Indigenous Peoples in an FPIC process is offered as a potential justification entity could give for continuing despite lack of FPIC.*<br><br>*d. draws on former guidance for what was called 'existing mines'.* |
| ***2.2.3*** | | ***Free, Prior and Informed Consent (FPIC) Scoping*** | ***2.2.4*** | | ***Engagement with Indigenous Peoples*** | |
| 2.2.3.2 | | The operating company shall collaborate with indigenous peoples' representatives and other relevant members of affected communities of indigenous peoples to:<br><br>a. Identify the appropriate means of engagement for each group of indigenous peoples (e.g., tribe, nation, population);<br><br>b. Identify indigenous peoples' rights and interests that may be affected by the proposed activities;<br><br>c. Identify additional studies or assessments needed to determine the range and degree of potential impacts on indigenous peoples' rights or interests; and<br><br>d. Identify if there are capacity issues that may prevent full and informed participation of indigenous peoples. If issues are identified, the operating company shall provide funding or facilitate other means to enable indigenous peoples to address capacity issues in their preferred manner; and<br><br>e. Ensure that the community as a whole/collective has meaningful opportunities to be involved in these processes. | 2.2.4.1 | Critical | If Indigenous Peoples (other than those Uncontacted or Living in Voluntary Isolation or in Initial Contact) whose rights or interests may be directly or indirectly affected by the site and its associated facilities have been identified as per 1.2.1.1. and 1.3.2.3:<br>a. The ENTITY collaborates with affected Indigenous Peoples' representatives to determine if they have an autonomous consultation and/or engagement protocol (or equivalent) in place that outlines rules of engagement for outside actors;<br>b. If such protocol is in place, the ENTITY follows the protocol;<br>c. If no such protocol exists, the ENTITY consults with affected Indigenous Peoples' representatives on their preferred rules of engagement, and documents, in a manner agreed to by affected Indigenous Peoples' representatives, the mutually-agreed engagement process to be followed;<br>d. If there is more than one distinct group of affected Indigenous Peoples , the ENTITY follows the engagement process agreed to by their representatives (whether they request to be included in coordinated or in separate engagement processes); and<br>e. The ENTITY has a system in place to ensure that general stakeholder-engagement or public-consultation processes are never considered as an acceptable process for engagement with affected Indigenous Peoples unless they expressly and explicitly agree to. | *a., b. and c. are variants of former 2.2.3.2.a which refers to identifying proper form of engagement, however adhering to existing engagement protocols also addressed in 2.2.4.1 and 2.2.4.2, and FPIC protocols also addressed in 2.2.6.1*<br><br>*d. adapted from former 2.2.4.1*<br><br>*[Note: Concepts expressed in former 2.2.3.2.d. and e. on inclusive participation in FPIC processes now incorporated into 2.2.6.7.b.]*<br><br>*e. makes explicit something that was implicit in 2018 Standard; the concept was also touched on in 2018 Standard guidance therefore not an additional action required of entities.*<br><br>*Made critical as failure to meet this requirement would have implications for the entity's ability* |

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| 2.2.4.1 | | If there is more than one distinct indigenous peoples' group (e.g., tribe, nation, population) that may be affected by the operating company's mining-related activities, they may be included in a coordinated process or separate FPIC processes, as desired by the indigenous peoples. | | | | *to meet the remainder of the chapter (and likley result in violation of Indigenous Peoples' rights)* |
| 2.2.3.2 | | The operating company shall collaborate with indigenous peoples' representatives and other relevant members of affected communities of indigenous peoples to:<br><br>a. Identify the appropriate means of engagement for each group of indigenous peoples (e.g., tribe, nation, population);<br><br>b. Identify indigenous peoples' rights and interests that may be affected by the proposed activities;<br><br>c. Identify additional studies or assessments needed to determine the range and degree of potential impacts on indigenous peoples' rights or interests; and<br><br>d. Identify if there are capacity issues that may prevent full and informed participation of indigenous peoples. If issues are identified, the operating company shall provide funding or facilitate other means to enable indigenous peoples to address capacity issues in their preferred manner; and<br><br>e. Ensure that the community as a whole/collective has meaningful opportunities to be involved in these processes. | 2.2.4.2 | | The Entity collaborates, in appropriate Indigenous language/s, with a diversity of members and representatives of affected Indigenous Peoples to identify:<br>a. How, when and in what formats relevant information will be shared with them to ensure that communications and information-sharing with affected Indigenous Peoples occurs in a manner that is deemed meaningful and usable by them ;<br>b. Also in a manner that is deemed culturally appropriate and easily accessible by them ;<br>c. Also in a manner that is deemed timely by them . When information cannot be shared in a timely manner, the ENTITY systematically provides affected Indigenous Peoples with a documented justification or explanation for the delay; and<br>d. This collaborative identification is inclusive of different genders, ages, and any potentially underserved and/or marginalized people, and includes all distinct groups (if applicable). | *Additional details added to former 2.2.3.2.a, aligned with standard-wide enhancements on information sharing expectations.*<br><br>*Second part of c. adds an additional expectation of the entity* |
| 2.2.1.2 | | The operating company shall ensure that indigenous peoples potentially affected by the company's mining-related activities are aware of the policy. | 2.2.4.3 | | The ENTITY proactively shares with directly and indirectly affected Indigenous Peoples, in accordance with requirement 2.2.4.2:<br>a. Its Indigenous Peoples' policy (2.2.1), and Indigenous Peoples are aware of the ENTITY's commitment to respect the right of Indigenous Peoples to FPIC;<br>b. Up-to-date information about its proposed, ongoing and past activities and associated facilities, as relevant; and<br>c. Up-to-date information about the potential human rights, environmental and social impacts of any proposed activities and associated facilities, and/or the actual impacts related to past and existing activities and associated facilities. | *a. is from former 2.2.1.2*<br><br>*b. and c. are drawn from former 2.2.3.1 (below)* |
| 2.2.3.1 | | The operating company shall:<br><br>a. Consult with indigenous peoples and others, and review other relevant date to identify indigenous peoples that own, occupy or otherwise use land, territories or resources that may be affected by the mining project;<br><br>b. Disclose to indigenous peoples, in a culturally | | | | |

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| | | appropriate manner, the preliminary project concepts and/or proposed activities, and the indigenous peoples' right to FPIC. | | | | |
| 2.2.3.2 | | The operating company shall collaborate with indigenous peoples' representatives and other relevant members of affected communities of indigenous peoples to:<br><br>a. Identify the appropriate means of engagement for each group of indigenous peoples (e.g., tribe, nation, population);<br><br>b. Identify indigenous peoples' rights and interests that may be affected by the proposed activities;<br><br>c. Identify additional studies or assessments needed to determine the range and degree of potential impacts on indigenous peoples' rights or interests; and<br><br>d. Identify if there are capacity issues that may prevent full and informed participation of indigenous peoples. If issues are identified, the operating company shall provide funding or facilitate other means to enable indigenous peoples to address capacity issues in their preferred manner; and<br><br>e. Ensure that the community as a whole/collective has meaningful opportunities to be involved in these processes. | 2.2.4.4 | | Through a mutually-agreed process (see 2.2.4.1), the ENTITY collaborates with a diversity of members and representatives of affected Indigenous Peoples to:<br>a. Identify all affected Indigenous Peoples' rights and interests that may potentially be affected by proposed activities, are being affected by ongoing activities, and/or have been affected by past activities and have not yet been remediated, building on the Indigenous rights scoping process required in requirement 1.3.2.3;<br>b. Identify additional studies or assessments needed to determine the range and degree of potential or actual impacts on affected Indigenous Peoples' rights and interests, identify how and by whom such additional information will be gathered, and conduct these additional studies or assessments accordingly;<br>c. Identify if there are capacity, accessibility, and/or financial issues that may prevent full and informed participation of affected Indigenous Peoples in any of those additional studies and assessments (b.);<br>d. Identify if there are capacity and/or financial issues that may prevent full and informed participation of affected Indigenous Peoples in any remedy and/or in FPIC processes;<br>e. Identify if there are capacity and/or financial issues that may prevent the participation of women, youth, persons with disabilities, and potentially underserved and/or marginalized people from the community, and from all distinct groups (if applicable), in ongoing engagement processes ;<br>f. Design and implement plans, in the manner preferred by Indigenous Peoples , to address any identified capacity, accessibility, and financial needs, including through the provision of funding and/or other financial support to affected Indigenous Peoples in a manner agreed to by them ; and<br>g. These collaborative identification and design processes are inclusive of different genders, ages, and any potentially underserved and/or marginalized people, and includes all distinct groups (if applicable). | *Scoping for indigenous rights impacts now is part of Chapter 1.3 (requirement 1.3.2.3).*<br><br>*a. is from forner 2.2.3.1.a*<br>*b. is from former 2.2.3.3, with new details*<br><br>*c. and d from former 2.2.3.2.d (addressing capacity gaps).*<br><br>*e. reference to participation of women, youth, etc. expansion of former 2.2.3.2.e*<br><br>*f. includes part of former 2.2.3.3.d (identification of info gaps and 'needs' which can include capacity needs). Financing capacity building or other needs also addressed in guidance to former 2.2.3.2.d.*<br><br>*Note: financing for capacity / technical support during the remedy process (itself a new expectation) addressed in 2.2.5.2 below).* |
| 2.2.3.3. | | The operating company shall collaborate with the Indigenous Peoples' representatives to design and implement plans to address the information gaps and needs identified through the scoping process. | | | | |

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| | | | 2.2.4.5 | | The ENTITY collaborates with affected Indigenous Peoples to develop and implement a grievance mechanism (or mechanisms) specific to Indigenous Peoples through which affected Indigenous Peoples can raise, and seek resolution or remedy for, complaints and grievances related to the site, its associated facilities, and the ENTITY's actions, as follows:<br>a. A grievance mechanism through which affected Indigenous Peoples, including Indigenous Rights Defenders, can raise, and seek resolution or remedy for, complaints and grievances related to the site, its associated facilities, and the ENTITY's actions is in place;<br>b. This grievance mechanism (or mechanism) is rights-compatible ;<br>c. This mechanism (or mechanisms) allows for both individual and collective/group complaints or grievances to be filed and addressed;<br>d. Members of affected Indigenous Peoples' communities have been informed about the existence and functioning of this grievance mechanism (or mechanisms), as well as of other relevant mechanisms ;<br>e. If the operational-level grievance mechanism developed as per 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, the Entity fully meets all requirements in Chapter 1.6, and that mechanism's procedures are reviewed, revised if necessary, and agreed to by affected Indigenous Peoples; and<br>f. If a separate mechanism is created to handle only complaints and grievances related to human rights, it is established and managed in a manner that fully meets all requirements in Chapter 1.6. | *New requirement; however, grievance redress for Indigenous Peoples was formerly addressed through cross-linkages with former Chapter 1.4 (on grievance redress, now Chapter 1.6) and former Chapter 1.3 (on human rights). These chapters indicated that the grievance mechanism must be culturally appropriate, and therefore this is not a new expectation of entitites.*<br><br>*d. added clarification that grievance mechanism is shared with Indigenous Peoples communities generally, not just Indigenous Peoples representatives.*<br><br>*e. and f. contains new cross-references, found throughout the Standard.* |
| | | | ***2.2.5*** | | ***Remedy for Impacts from Activities Implemented without FPIC before June 2018*** | |

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| | | | 2.2.5.1 | | At operations where the FPIC of affected Indigenous Peoples was not previously obtained (either by the ENTITY or a prior owner/operator) for any mining-related activity and/or associated facility that became operational before June 2018 and where there are any unremediated impacts that are continuing to affect the rights or interests of those affected Indigenous Peoples (as identified per 2.2.4.4, and hereafter referred to as 'ongoing unremediated impacts'):<br>a. The ENTITY develops, in collaboration with affected Indigenous Peoples and in accordance with requirement 2.2.4.1, a mutually-agreed remedy process (or equivalent) to discuss/negotiate the measures that will be taken to provide remedy for any ongoing unremediated impacts identified as per 2.2.4.4.a, and any applicable terms and conditions;<br>b. If there are impacts on specific individuals, the process includes input from and remedy for these directly affected individuals;<br>c. The ENTITY, in collaboration with affected Indigenous Peoples' representatives, takes specific action to facilitate the participation of potentially underserved and/or marginalized people from the community, and from all distinct groups (if applicable);<br>d. The ENTITY provides funding to affected Indigenous Peoples, in a manner agreed to by them , to select and hire technical and/or legal advisors of their own choosing to support them during this mutually-agreed remedy process (or equivalent);<br>e. The process is documented. | *New requirement within this chapter; however, remedy for ongoing unremediated impacts on human rights in general addressed in former Chapter 1.3 (human rights due diligence). Also, guidance for former 2.2.2.2 states that, where FPIC has not been obtained in the past, that the entity will "seek to achieve the objectives of this chapter" including demonstrating they have a process in place to remedy and / or compensate for past impacts.*<br><br>*Re. subrequirement d: Chapter 1.3 formerly included a requirement (1.3.4.2, now adapted into 1.3.6.3) requiring entities with demonstrable human rights issues to finance external monitors of human rights impacts; therefore, this subrequirement is therefore not an entirely new / distinct obligation).* |

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| | | | 2.2.5.2 | | If this process results in mutual agreement to remediate ongoing unremediated impacts, a draft agreement (or agreements) containing the measures, terms and conditions reached during negotiations is prepared by competent professionals in collaboration with affected Indigenous Peoples' representatives, as follows:<br>It includes the mutually-agreed measures to be taken to prevent, and where prevention is not possible or not immediately possible, to mitigate and remediate, ongoing unremediated impacts on affected Indigenous Peoples' rights and interests, and the mutually-agreed measures to be taken to deliver sustained positive benefits to affected Indigenous Peoples;<br>It includes the mutually-agreed implementation schedule, and details on how implementation and effectiveness will be monitored and evaluated ;<br>It includes details on the mutually-agreed process for the parties to resolve any future disputes ;<br>It includes a financing plan to ensure that funding is available for effective implementation;<br>Members of affected Indigenous Peoples' communities are provided an opportunity to review and verify that the draft agreement's terms and conditions reflect what was understood by them during negotiations; and<br>Once, and only once the draft agreement has been reviewed and verified (e.), it is formally approved (signed or otherwise validated) by affected Indigenous Peoples' representatives and the Entity's top management. | *New requirement - remedy for ongoing unremediated impacts formerly addressed in former chapter 1.3 (human rights due diligence).*<br><br>*Note: guidance for former 2.2.2.2 indicated that existing mines that did not obtain FPIC have to have in place a mechanism to remediate past impacts, so expectation is not entirely new.* |
| | | | 2.2.5.3 | | Once the agreement has been formally approved by all parties (as per 2.2.5.2), the ENTITY:<br>a. Prior to any implementation, proactively informs members of the affected Indigenous Peoples' communities of the mutually-agreed remedy agreement (or agreements) that is to be implemented, unless affected Indigenous Peoples' representatives explicitly request otherwise;<br>b. Documents, in a manner agreed to by affected Indigenous Peoples, the implementation and outcomes of the remedy agreement (or agreements), and proactively shares this information with affected Indigenous Peoples, in accordance with requirement 2.2.4.2; and<br>c. Neither states nor implies in any public communications that a mutually-agreed remedy agreement constitutes, or is the equivalent of, the FPIC of affected Indigenous Peoples for any past, current, or future activities. | *New requirement - remedy for ongoing unremediated impacts formerly addressed in former chapter 1.3 (human rights due diligence).*<br><br>*Note: guidance for former 2.2.2.2 indicated that existing mines that did not obtain FPIC have to have in place a mechanism to remediate past impacts., so expectation is not entirely new.* |
| | | | 2.2.5.4 | | In a manner agreed to by affected Indigenous Peoples, the ENTITY:<br>a. Publicly reports on the process that was followed to obtain agreement on remedy measures;<br>b. Publicly reports on the implementation and outcomes of the mutually-agreed remedy agreement; and<br>c. Makes and maintains publicly accessible the final agreement reviewed and signed (or otherwise validated) by affected Indigenous Peoples' representatives. | *New requirement - remedy for ongoing unremediated impacts formerly addressed in former chapter 1.3 (human rights due diligence).* |

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| | | | 2.2.5.5 | IRMA+ | At operations where past activities that affected the rights or interests of Indigenous Peoples are unremediated (as identified per 2.2.4.4), the ENTITY collaborates with Indigenous Peoples' representatives to support them in:<br>a. Identifying an independent body that could establish and/or lead remedy or reconciliation processes, transitional justice or other relevant mechanisms to address these past unremediated impacts;<br>b. Facilitating the participation of potentially underserved and/or marginalized people from the Indigenous community, and from all distinct groups (if applicable), in such processes; and<br>c. Providing funding to those affected Indigenous Peoples, in a manner agreed to by them, to select and hire technical and/or legal advisors of their own choosing to support them during such processes. | *New OPTIONAL IRMA+ requirement - remedy for **past** unremediated impacts, expanding on what was formerly addressed in former chapter 1.3 (human rights due diligence).* |
| ***2.2.4*** | | ***Determine FPIC Processes*** | ***2.2.6*** | | ***Respecting the Right to FPIC for New Activities*** | *Clarified cut-off date* |
| 2.2.4.1 | | If there is more than one distinct indigenous peoples' group (e.g., tribe, nation, population) that may be affected by the operating company's mining-related activities, they may be included in a coordinated process or separate FPIC processes, as desired by the indigenous peoples. | 2.2.6.1 | | If any mining-related activity and/or associated facility (for new projects or at existing operations ) planned to, or proposed to, become operational after June 2018 may result in new or increased impacts on the rights or interests of affected Indigenous Peoples:<br>a. The ENTITY collaborates with affected Indigenous Peoples' representatives to determine if they have an autonomous FPIC protocol (or equivalent) in place for respecting their FPIC for proposed activities;<br>b. If such protocol is in place, the ENTITY follows the protocol unless changes are agreed by affected Indigenous Peoples,<br>c. If no such protocol exists, the ENTITY consults with affected Indigenous Peoples' representatives and support them to develop, document, and implement a process, in their preferred manner, that aligns with the internationally-recognized dimensions of the right to FPIC ; and<br>d. If there is more than one distinct group of affected Indigenous Peoples (e.g., nation, population) that may be affected by the ENTITY's mining-related activities, each is included in an FPIC process as agreed to by their representatives (whether they request to be included in coordinated or in separate FPIC processes); and<br>e. The ENTITY provides funding to affected Indigenous Peoples, in a manner agreed to by them , to select and hire technical and/or legal advisors of their own choosing to support them during each FPIC process. | *a., b. and c. adapted from former 2.2.4.2*<br>*d. adapted from former 2.2.4.1*<br><br>*e. expands upon guidance to former 2.2.3.2.d which cites legal advice as a potential source of support for participation in engagement; this requirement applies it more specifically to the FPIC process (as opposed to scoping / information gathering, which is addressed in 2.2.4.7)* |
| 2.2.4.2 | | If the potentially affected indigenous peoples have an FPIC protocol in place or under development, the operating company shall abide by it unless changes are agreed to by the indigenous peoples' group(s). Otherwise, the operating company shall jointly develop and document, in a manner agreed to by indigenous peoples' representatives, the FPIC process or processes to be followed. | | | | |
| 2.2.3.2 | | The operating company shall collaborate with indigenous peoples' representatives and other relevant members of affected communities of indigenous peoples to:<br>[...]<br>d. Identify if there are capacity issues that may prevent full and informed participation of indigenous peoples. If issues are identified, the operating company shall provide funding or facilitate other means to enable indigenous peoples to address capacity issues in their preferred manner; and<br>[...] | | | | |

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| 2.2.2.4 | | If indigenous peoples' representatives clearly communicate, at any point during engagement with the operating company, that they do not wish to proceed with FPIC-related discussions, the company shall recognize that it does not have consent, and shall cease to pursue any proposed activities affecting the rights or interests of the indigenous peoples. The company may approach indigenous peoples to renew discussions only if agreed to by the indigenous peoples' representatives. | 2.2.6.2 | | In all cases (b. or c.), each FPIC process for mining-related activities and/or associated facilities (for new projects or at existing operations) planned to, or proposed to, become operational after June 2018 that may result in new or increased impacts on the rights or interests of affected Indigenous Peoples:<br>a. Outlines any affected Indigenous Peoples' customs and protocols to be respected, and specifies the decision-making processes of the respective parties;<br>b. Includes discussions on potential impacts of those proposed mining-related activities and/or associated facilities;<br>c. Includes negotiations/discussions on measures that could be taken to prevent, and where prevention is not possible or not immediately possible, to mitigate and to remediate, adverse impacts on affected Indigenous Peoples' rights and interests;<br>d. Includes negotiations/discussions on measures that could be taken to deliver sustained positive benefits to Indigenous Peoples;<br>e. Includes negotiations/discussions on the conditions under which affected Indigenous Peoples may (or may not) withdraw or revoke consent, and includes the conditions under which the ENTITY may (or may not) request renewal of discussions if the process fails to result in consent for proposed activities or associated facilities;<br>f. Includes specific actions, developed in collaboration with affected Indigenous Peoples' representatives, to facilitate the participation of potentially underserved and/or marginalized people from the community; and<br>g. The process is documented. | *a. incorporates components of former 2.2.3.2a*<br><br>*b. to d. incorporate components of former 2.2.3.2.b but mentions positive benefits specifically*<br><br>*e. incorporates components of former 2.2.2.4 (conditions under which FPIC conversations can be reinstated)* |
| 2.2.3.2 | | The operating company shall collaborate with indigenous peoples' representatives and other relevant members of affected communities of indigenous peoples to:<br>[...]<br>d. Identify if there are capacity issues that may prevent full and informed participation of indigenous peoples. If issues are identified, the operating company shall provide funding or facilitate other means to enable indigenous peoples to address capacity issues in their preferred manner; and<br>[...] | | | | |
| 2.2.2.2 | Critical | New mines shall not be certified by IRMA unless they have obtained the free, prior and informed consent (FPIC) of potentially affected indigenous peoples. The circumstances for obtaining FPIC include situations where mining-related activities may affect indigenous peoples' rights or interests, including those that may: impact on lands, territories and resources; require the physical relocation of people; cause disruption to traditional livelihoods; impact on critical cultural heritage; or involve the use of cultural heritage for commercial purposes. | 2.2.6.3 | Critical | If the FPIC process (or processes) results in identification by affected Indigenous Peoples that any mining-related activity and/or associated facility (for new projects or at existing operations ) planned to, or proposed to, become operational after June 2018 may result in new or increased impacts on their rights or interests, the ENTITY pursues the proposed activities only if has obtained the free, prior, and informed consent of affected Indigenous Peoples . | *Draws on intent of former 2.2.2.2 and 2.2.2.3, and 2.2.6.1.*<br><br>*Critical as former 2.2.2.2 was critical and it draws heavily on the intent of that requirement.* |
| 2.2.2.3 | | For new and existing mines, the operating company shall obtain FPIC from indigenous peoples for proposed changes to mining-related activities that may result in new or increased impacts on indigenous peoples' rights or interests. | | | | |
| 2.2.6.1 | | For new mines, IRMA certification is not possible if a mining project does not obtain free, prior and informed consent from indigenous peoples. | | | | |

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| 2.2.2.4 | | If indigenous peoples' representatives clearly communicate, at any point during engagement with the operating company, that they do not wish to proceed with FPIC-related discussions, the company shall recognize that it does not have consent, and shall cease to pursue any proposed activities affecting the rights or interests of the indigenous peoples. The company may approach indigenous peoples to renew discussions only if agreed to by the indigenous peoples' representatives. | | | | |
| ***2.2.5*** | | ***Implement FPIC Process*** | | | | |
| 2.2.5.3 | | If the process results in consent being given by indigenous peoples to certain mining-related activities, an agreement outlining the terms and conditions shall be signed or otherwise validated by the operating company and the representative(s) of the indigenous peoples. The agreement shall be binding and shall be made publicly available unless the indigenous peoples' representatives explicitly request otherwise. | 2.2.6.4 | | If the FPIC process (or processes) results in mutual agreement that led affected Indigenous Peoples to give their free, prior, and informed consent for the proposed mining-related activity and/or associated facility, a draft agreement (or agreements) containing the terms and conditions reached during negotiations is prepared by competent professionals in collaboration with affected Indigenous Peoples, as follows:<br>a. It includes the mutually-agreed measures to be taken to prevent, and where prevention is not possible or not immediately possible, to mitigate and remediate, potential and actual adverse impacts on affected Indigenous Peoples' right and interests, and the mutually-agreed measures to be taken to deliver sustained positive benefits to affected Indigenous Peoples;<br>b. It includes the mutually-agreed implementation schedule, and details on how implementation and effectiveness will be monitored and evaluated ;<br>c. It includes details on the mutually-agreed process for the parties to resolve any future disputes ;<br>d. It includes a financing plan to ensure that funding is available for effective implementation;<br>e. Members of affected Indigenous Peoples' communities are provided an opportunity to review and verify that the draft agreement's terms and conditions reflect what was understood by them during negotiations; and<br>f. Once, and only once the draft agreement has been reviewed and verified (e.), it is formally approved (signed or otherwise validated) by affected Indigenous Peoples' representatives and the ENTITY's top management. | *Expands on former 2.2.5.3 (first part asking for a FPIC agreement with terms and conditions to be signed by the entity and Indigenous Peoples).*<br><br>*b. to d. added in alignment with broader standard changes where plans need to be linked to supporting resources.*<br><br>*e and f. expanding on expectation in former 2.2.5.3 that Indigenous Representatives are able to review and validate* |
| 2.2.5.3 | | If the process results in consent being given by indigenous peoples to certain mining-related activities, an agreement outlining the terms and conditions shall be signed or otherwise validated by the operating company and the representative(s) of the indigenous peoples. The agreement shall be binding and shall be made publicly available unless the indigenous peoples' representatives explicitly request otherwise. | 2.2.6.5 | | Once the agreement has been formally approved by all parties (as per 2.2.6.4), the ENTITY:<br>a. Prior to any implementation, proactively informs members of the affected Indigenous Peoples' communities of the mutually-agreed remedy agreement (or agreements) that is to be implemented, unless affected Indigenous Peoples' representatives explicitly request otherwise;<br>b. Takes specific measures, in collaboration with affected Indigenous Peoples' representatives, to facilitate the participation | *a. addresses the need to disclose to Indigenous Communities themselves the FPIC agreements (former 2.2.5.3 only asked that the agreement(s) be publicly disclosed in addition to Indigenous People's representatives having validated)* |

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| 2.2.3.2 | | The operating company shall collaborate with indigenous peoples' representatives and other relevant members of affected communities of indigenous peoples to:<br>...<br><br>e. Ensure that the community as a whole/collective has meaningful opportunities to be involved in these processes. | | | of women, youth, persons with disabilities, and potentially underserved and/or marginalized people from the community, and from all distinct groups (if applicable), in the implementation of this agreement (or agreements); and<br>c. Documents, in a manner agreed to by affected Indigenous Peoples, the implementation and outcomes of this FPIC agreement (or agreements), and proactively shares this information with affected Indigenous Peoples, in accordance with requirement 2.2.4.2. | *b. draws on concepts of inclusive engagement in former 2.2.3.2.e (although that requirement refers specifically to the scoping process).*<br><br>*c. Obligation to document FPIC process and outcome from former 2.2.5.1 - 2.2.5.3; also implicit in former 2.2.4.3 (requirement to make the FPIC agreement public implies that it was documented).* |
| 2.2.4.3 | | The operating company shall make information on the mutually-agreed FPIC processes publicly available, unless the indigenous peoples' representatives have explicitly requested otherwise. | | | | |
| 2.2.4.3 | | The operating company shall make information on the mutually-agreed FPIC processes publicly available, unless the indigenous peoples' representatives have explicitly requested otherwise. | 2.2.6.6 | | In a manner agreed to by affected Indigenous Peoples, the ENTITY:<br>a. Publicly reports on the process (or processes) that was followed to obtain the free, prior, and informed consent of affected Indigenous Peoples;<br>b. Publicly reports on the implementation and outcomes of the mutually-agreed FPIC agreement (or agreements); and<br>c. Makes publicly accessible the final FPIC agreement (or agreements) reviewed and formally approved (signed or otherwise validated) by affected Indigenous Peoples' representatives. | *a. from former 2.2.5.2 and 2.2.4.3*<br>*b. new subrequirement (to publicly report not just on process and agreement, but also implementation)*<br>*c. from former 2.2.5.2 and 2.2.5.3 (which both ask for the agreement or 'outcome' of FPIC process to be make public)* |
| 2.2.5.2 | | The operating company shall publicly report, in a manner agreed to by the indigenous peoples, on the FPIC process that was followed and its outcome. | | | | |
| 2.2.5.3 | | If the process results in consent being given by indigenous peoples to certain mining-related activities, an agreement outlining the terms and conditions shall be signed or otherwise validated by the operating company and the representative(s) of the indigenous peoples. The agreement shall be binding and shall be made publicly available unless the indigenous peoples' representatives explicitly request otherwise. | | | | |
| 2.2.2.4 | | If indigenous peoples' representatives clearly communicate, at any point during engagement with the operating company, that they do not wish to proceed with FPIC-related discussions, the company shall recognize that it does not have consent, and shall cease to pursue any proposed activities affecting the rights or interests of the indigenous peoples. The company may approach indigenous peoples to renew discussions only if agreed to by the indigenous peoples' representatives. | 2.2.6.7 | | The ENTITY has a system in place to ensure that, if affected Indigenous Peoples or credible sources of information indicate a possible breach or violation of the FPIC agreement/s by the ENTITY, or indicate the existence of new information that affected Indigenous Peoples should have had when making their decision, mutually-agreed competent professionals collaborate with affected Indigenous Peoples and the ENTITY to:<br>a. Jointly determine the existence and nature of such breach or violation, and/or the significance of such new information and its likelihood to change the outcomes of the FPIC process/es;<br>b. Establish a resolution mechanism to remedy any harm done, and where necessary to modify, suspend or terminate the activities or facilities for which consent would be withdrawn; and<br>c. Provide, if required, funding to affected Indigenous Peoples, in a manner agreed to by them, to select and hire technical and/or legal advisors of their own choosing to support them during this joint investigation and resolution mechanism. | *b. expands on concepts in former 2.2.2.4*<br><br>*a. and c. are new sub-requirements*<br><br>*Reference in former 2.2.2.4 to conditions under which negotiations can be reinitiated now included in 2.2.6.2.c.* |

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| | | | 2.2.6.8 | IRMA+ | The ENTITY has a system in place to ensure that, if affected Indigenous Peoples or credible sources of information indicate a possible breach or violation of the FPIC agreement/s by the ENTITY, or indicate the existence of new information that affected Indigenous Peoples should have had when making their decision:<br>a. As a precautionary measure, the ENTITY immediately suspends the activities or facilities for which the validity of the FPIC process/es may be affected, while the joint investigation and resolution mechanism is established and ongoing (see 2.2.6.7);<br>b. Where the joint investigation and resolution mechanism results in consent being withdrawn, the ENTITY takes steps to prevent or mitigate the impacts of the suspension or termination of the activities or facilities for which consent is withdrawn, including through the implementation of all relevant closure and post-closure measures required in Chapter 2.7; and<br>c. The ENTITY provides reasonable notice to all relevant stakeholders and business partner/s. | *New OPTIONAL IRMA+ requirement - to offer additioanl safeguards to affected Indigenous Peoples when a possible breach or violation of the FPIC agreement/s by the Entity has been indicated.* |
| ***2.2.7*** | | ***Implementation and Ongoing Engagement*** | ***2.2.7*** | | ***Monitoring and Evaluation*** | |
| 2.2.7.1 | | The operating company shall collaborate with indigenous peoples to monitor implementation of the FPIC agreement, and document the status of the commitments made in the agreement. | 2.2.7.1 | | To monitor and evaluate the implementation and effectiveness of remedy and/or FPIC agreements, the ENTITY collaborates with affected Indigenous Peoples to:<br>a. Regularly track and document implementation progress of any remedy and/or FPIC agreements, over successive time periods, in the manner defined and validated by affected Indigenous Peoples (see 2.2.5.2.b and/or 2.2.6.4.b);<br>b. Regularly track and document how the measures developed and implemented as per 2.2.5.2 and 2.2.6.4 are effectively preventing, and where prevention is not possible or not immediately possible, mitigating and remediating adverse impacts on affected Indigenous Peoples' rights and interests; and<br>c. Regularly track and document how the measures developed and implemented as per 2.2.5.2 and 2.2.6.4 are effectively delivering sustained positive benefits to affected Indigenous Peoples. | *Expansion of former 2.2.7.1, monitoring of 'remedy' now included. Requirement text expanded to align with broader Standard changes to M&E expectations.* |
| | | | 2.2.7.2 | | The monitoring and evaluation process:<br>a. Encourages and facilitates joint tracking or joint fact-finding with affected Indigenous Peoples, in a manner that is inclusive of different genders, ages, and any potentially underserved and/or marginalized people from the community, and from all distinct groups (if applicable);<br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected Indigenous Peoples;<br>c. Includes continuous stakeholder feedback on the timeliness, accessibility, inclusiveness, and cultural appropriateness of information-sharing (see 2.2.4.2); and<br>d. Includes safeguards to protect the security and privacy of collected personal data or characteristics of affected Indigenous Peoples . | *c. new subrequirement to ensure review of means/terms of communication and information-sharing (mirror Chapter 1.2*<br><br>*d. new sub-requirement aligned with inclusion of data privacy concerns Standard-wide* |
| | | | ***2.2.8*** | | ***Continuous Improvement*** | |

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| | | | 2.2.8.1 | | At least twice a year, or more frequently if requested by affected Indigenous Peoples, the ENTITY collaborates with them to:<br>a. Review the monitoring and evaluation results, informed by internal and external feedback, as per Section 2.2.7;<br>b. Review any Indigenous-rights-related grievances and the functioning of its relevant grievance mechanism/s required in 2.2.4.5 (see also Section 1.6.4);<br>c. Review the ENTITY's effectiveness in preventing, and where prevention is not possible or not immediately possible, mitigating and remediating adverse impacts on affected Indigenous Peoples' rights and interests, and in delivering sustained positive benefits to affected Indigenous Peoples, informed by the monitoring and evaluation required in 2.2.7.1 and 2.2.7.2;<br>d. Develop and implement time-bound corrective measures to update, if necessary , how, the ENTITY engage with affected Indigenous Peoples, in accordance with Section 2.2.4;<br>e. Develop and implement time-bound corrective measures to update, if necessary , the remedy and/or FPIC agreements, in accordance with Sections 2.2.5 and 2.2.6;<br>f. Develop and implement time-bound corrective measures to update, if necessary , the monitoring and evaluation processes, in accordance with Section 2.2.7. | *New requirement to align with Standard-wide expectations for continuous improvement (2018 Standard only asked for 'documentation' of status of FPIC agreement commitments (former 2.2.7.1)*<br><br>*b. already required under former and current Chapter on grievance redress, therefore not a new obligation for entitites.*<br><br>*d. to f are new, to align with Standard-wide expectations for continuous improvement.* |

## Chapter 2.3 Gender Equity, and Sexual and Gender-Based Violence

This is a new Chapter

# Chapter 2.4 Obtaining Community Support and Delivering Benefits

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **2.3** | | **Obtaining Community Support and Delivering Benefits** | **2.4** | | **Obtaining Community Support and Delivering Benefits** | |
| | | | ***2.4.1*** | | ***Formalized Policy*** | |
| 2.3.1.1 | | The operating company shall publicly commit to:<br><br>a. Maintaining or improving the health, social and economic wellbeing of affected communities; and<br><br>b. Developing a mining project only if it gains and maintains broad community support. | 2.4.1.1 | | The ENTITY has a formal policy in place that:<br>a. Commits to improve, or at least maintain, the health, and social and economic wellbeing 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;<br>b. Commits to maximize employment and procurement opportunities for local community members;<br>c. Sets clear expectations for how personnel, contractors, and other relevant parties linked to the site and its associated facilities shall adhere to this policy;<br>d. Is approved at the top management level of the ENTITY;<br>e. Is proactively communicated to personnel, contractors, and other relevant parties linked to the site and its associated facilities;<br>f. Is publicly accessible; and<br>g. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the site. | *Builds on former 2.3.1.1, adding details in alignment with expectations in other chapters for policy formation and resourcing.*<br><br>*Former 2.3.1.1.b removed as Standard now applies equally to existing and new projects / operations, and it is not IRMA's intent to state that existing mines must cease operations absent a demonstration of BCS; moreoever, the "gains and maintains" has been changed to "understands and improves" per section 2.4.2 below.* |
| ***2.3.2*** | | ***Obtaining Community Support*** | ***2.4.2*** | | ***Understanding and Strengthening Community Support*** | *Section heading changed to reflect new approach community support* |

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| | | | 2.4.2.1 | Critical | 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:<br>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;<br>b. It includes gender-disaggregated indicators, and other categories of disaggregated indicators where appropriate ; and<br>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. | *New requirement - replaces former 2.3.2.1 which asked for formal demonstrations / evidence of support (see full explanation in intro to Chapter text). This requirement instead asks that entities develop a formal system to understand / track levels and motivations for support / opposition.* |
| | | | 2.4.2.2 | | The ENTITY has a system in place to ensure that:<br>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 ;<br>b. The data and results are proactively shared and discussed with affected communities, in accordance with Chapter 1.2;<br>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;<br>d. It proactively seeks input from affected communities on whether or not the methodology for gauging community support needs to be improved; and<br>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; | *New requirement - replaces former 2.3.2.1 and 2.3.2.2 which asked for formal demonstrations / evidence of support (see full explanation in intro to Chapter text). This requirement asks entities to share results of the study in 2.3.2.1 with stakeholders and solicit their feedback.* |

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| | | | 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:<br>a. The plan outlines specific measures to strengthen the level and diversity of community support for the project/operation;<br>b. If necessary , it outlines specific measures to improve the methodology for gauging community support;<br>c. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>d. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>e. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for the affected rights-holders and stakeholders;<br>f. It maintains estimates of human resources and budget required; and<br>g. It includes a financing plan to ensure that funding is available for the effective implementation of the plan. | *New requirement aligned with the Plan-Do-Check-Act approach of the Standard. Designed to action the findings from 2.4.2.2. above.* |
| ***2.3.3*** | | ***Planning and Delivering Community Benefits*** | ***2.4.3*** | | ***Management Plans to Deliver Community Benefits*** | |
| 2.3.3.1 | | The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company's contributions to community development initiatives and benefits in affected communities. | 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 ) is developed and documented by competent professionals, in collaboration with affected communities, as follows:<br>a. The plan includes community development and benefit measures/initiatives that benefit a broad spectrum of the community or that target specific groups in ways that are accepted by the beneficiaries and the communities;<br>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 of affected people;<br>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;<br>d. The plan ensures that measures/initiatives are developed and documented in culturally appropriate and easily accessible manner, in accordance with Chapter 1.2;<br>e. It assigns implementation of measures to responsible staff with adequate skills and expertise; | *a. and b. are from former 2.3.3.4.b but add content for clarity.*<br><br>*c. is from former 2.3.3.4.c*<br><br>*d. draws on intent of former 2.3.3.1 (involvement of stakeholder to ensure appropriateness) and similar expectations in Chapter 1.2*<br><br>*e. to i. are new: in alignment with Standard-wide changes to expectations re: resourcing and implementation of management plans.* |

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| 2.3.3.4 | | Efforts shall be made to develop:<br><br>a. Local procurement opportunities;<br><br>b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and<br><br>c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). | | | f. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>g. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for the affected rights-holders and stakeholders;<br>h. It maintains estimates of human resources and budget required; and<br>i. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | |
| 2.3.3.2 | | The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency. | 2.4.3.2 | | In accordance with Chapter 1.2, the plan is informed by a participatory planning process with affected communities, that:<br>a. Facilitates participation by a broad spectrum of the communities, including different genders, ages, and ethnicities;<br>b. Include specific measures to facilitate the participation any potentially underserved and/or marginalized people ;<br>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;<br>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<br>e. If assistance by independent experts chosen by affected communities 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. | *Builds on former 2.3.3.2 (for the process), 2.3.3.3 (for independent experts financed by the entity), 2.3.3.4 (for the outcome) and 2.3.3.5 for the sharing of information.*<br><br>*a. and b. are former 2.3.3.2*<br><br>*c. 1) is from former 2.3.3.2 and 2) expands from former 2.3.3.4.b*<br><br>*d. is from former 2.3.3.5.*<br><br>*e. is former 2.3.3.3* |
| 2.3.3.4 | | Efforts shall be made to develop:<br><br>a. Local procurement opportunities;<br><br>b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and<br><br>c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). | | | | |
| 2.3.3.5 | | The planning process and any outcomes or decisions shall be documented and made publicly available. | | | | |
| 2.3.3.3 | | If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process. | | | | |

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| 2.3.3.4 | | Efforts shall be made to develop:<br><br>a. Local procurement opportunities;<br><br>b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and<br><br>c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). | 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:<br>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) ;<br>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);<br>c. It is proactively shared with local suppliers, business-owners and entrepreneurs, along with the suppliers' Code of Conduct required in 1.4.2;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for local suppliers and businesses;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *Largely new: but builds on intent of former 2.3.3.4.a, however asks specifically for a local procurement management plan (formerly only the actions were mandated, not a plan detailing them).*<br><br>*e. to i. are new: in alignment with Standard-wide changes to expectations re: resourcing and implementation of management plans.* |

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| 2.3.3.4 | | Efforts shall be made to develop:<br><br>a. Local procurement opportunities;<br><br>b. Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and<br><br>c. Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). | 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:<br>a. Outlines specific measures to address barriers to, and maximize enablers and opportunities to, employment of local community members, including as consultants or contractors;<br>b. Outlines specific measures to support skills development and career advancement of employees coming from local communities;<br>c. Includes appropriate time-bound performance indicators (including gender-disaggregated indicators and other categories of disaggregated indicators where appropriate) to enable evaluation of the effectiveness of the local employment measures taken;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for the affected communities;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *Largely new: but builds on intent of former 2.3.3.4.a, however asks specifically for a local employment management plan (formerly only the actions were mandated, not a plan detailing them).*<br><br>*e. to i. are new: in alignment with Standard-wide changes to expectations re: resourcing and implementation of management plans.* |
| | | | ***2.4.4*** | | ***Monitoring and Evaluation*** | |

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| | | | 2.4.4.1 | | To monitor and evaluate the implementation and effectiveness of the community benefit plan, the ENTITY:<br>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 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;<br>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 ; and<br>c. Includes continuous feedback from internal and external sources to inform these monitoring and evaluation activities. | *New requirement - aligned with Standard-wide changes to M&E expectations in accordance with the Plan-Do-Check-Act approach integrated throughout the standard.* |
| | | | 2.4.4.2 | | To monitor and evaluate the implementation and effectiveness of the local procurement and employment management plans, the ENTITY:<br>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;<br>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;<br>c. Includes continuous feedback from internal and external sources to inform these monitoring and evaluation activities;<br>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. | *New requirement - aligned with Standard-wide changes to M&E expectations in accordance with the Plan-Do-Check-Act approach integrated throughout the standard.* |
| | | | ***2.4.5*** | | ***Continuous Improvement*** | |

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| 2.3.3.6 | | In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements. | 2.4.5.1 | | At least annually, but without undue delay after a significant change, the ENTITY:<br>a. Reviews the monitoring and evaluation results, informed by internal and external feedback, as per Section 2.4.4;<br>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);<br>c. Reviews is effectiveness in improving, or at least maintaining, the social and economic wellbeing of communities affected by its activities as per 2.4.3, informed by the monitoring and evaluation required in 2.4.4.1;<br>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;<br>e. Develops and implements time-bound corrective measures to update, if necessary , 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;<br>f. Develops and implements time-bound corrective measures to update, if necessary , its community benefit plan in accordance with Section 2.4.3;<br>g. Develops and implements time-bound corrective measures to update, if necessary , its local procurement and employment management plans in accordance with Section 2.4.3; and<br>h. Develops and implements time-bound corrective measures to update, if necessary , its monitoring and evaluation process in accordance with Section 2.4.4. | *Builds upon the intent of former 2.3.3.6, adding content aligned with other Standard-wide changes in alignment with Plan-Do-Check-Act approach.*<br><br>*d. and g. are new (see 2.4.3.3 and 2.4.3.4)*<br><br>*h. new sub-requirement that asks for the M&E process itself to be subject to evaluation and improvement, if necessary.* |
| | | | ***2.4.6*** | | ***Information-Sharing and Public Reporting*** | |
| 2.3.3.5 | | The planning process and any outcomes or decisions shall be documented and made publicly available. | 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:<br>a. The methodology used to gauge community support, required in 2.4.2;<br>b. A summary of the data collected through, and the results of, all the protocols and/or processes implemented to gauge community support; and<br>c. A summary of the measures and actions taken to strengthen community support, and the extent to which they are being effective. | *Builds upon intent of former 2.3.3.5 - adding content aligned with other Standard-wide changes in alignment with Plan-Do-Check-Act approach.* |

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| | | | 2.4.6.2 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. A summary of its local procurement management plan, as required per 2.4.3.3;<br>b. A summary of its local employment management plan, as required per 2.4.3.4; and<br>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); | *Builds upon intent of former 2.3.3.5 - adding content specific to local content plan aligned with other Standard-wide changes in alignment with Plan-Do-Check-Act approach.* |
| | | | 2.4.6.3 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. The number of people from local communities who work as employees, disaggregated by gender, for the reporting period;<br>b. The number of people from local communities who work for its contractors, disaggregated by gender, for the reporting period; and<br>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. | *New requirement to increase transparency on efficacy of local content plan.* |
| | | | 2.4.6.4 | *IRMA+* | *The ENTITY also disaggregates the data required in 2.4.6.3 by:*<br>*a. Age group/range;*<br>*b. Disability ;*<br>*c. Indigenous status, if relevant; and*<br>*d. Any potentially underserved and/or marginalized people.* | *New OPTIONAL requirement.* |
| 2.3.2.1 | | For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained. | | | | *Deleted - replaced by Section 2.4.2 above.* |

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| 2.3.2.2 | | For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad community support shall be considered credible if the process or method used to demonstrate support:<br><br>a. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project;<br><br>b. Was transparent;<br><br>c. Was free from coercion or manipulation; and<br><br>d. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution. | | | | *Deleted - replaced by Section 2.4.2 above.* |
| 2.3.2.3 | | For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support. | | | | *Deleted - replaced by Section 2.4.2 above.* |

# Chapter 2.5 Land Acquisition, Displacement, and Resettlement

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **2.4** | | **Resettlement** | **2.5** | | **Land Acquisition, Displacement, and Resettlement** | |
| | | | ***2.5.1*** | | ***Land Acquisition Review*** | *Created a new Section, 'Land Acquisition Review' (required of all entities, even if the intent is to deem the chapter 'not relevant') to distinguish it from risk and impact assessment (now Section 2.5A.2).* |
| | | | 2.5.1.1 | | A review process is conducted by competent professionals to:<br>a. Identify and document all applicable laws and regulations in the country of operation that are related to land acquisition and resettlement, as well as circumstances of any land acquisition that already occurred in the project/operation's area of influence;<br>b. This review includes, to the extent possible, records of formal and informal land ownership , land use, and land occupancy on any lands acquired by/for the project/operation by the ENTITY, prior owner/s, or government in the case of government-led land acquisition;<br>c. This review determines, to the extent possible, whether there was any physical or economic displacement resulting from land acquisition and/or any other potential project-related displacement , considering both formal and informal owners, as well as occupants and land users, if any; and<br>d. This review determines, to the extent possible, if there was any physical or economic displacement of Indigenous Peoples. | *New requirement, created so that burden of determining whether or not the chapter should be relevant does not fall upon auditors (i.e., the site must do their due diligence and provide evidence).*<br><br>*NOTE: applies to both sub-Chapter 2.5A and 2.5B - the remainder of the requirements below are 2.5A (as there was no 'historical', i.e., 2.5B, chapter in 2018 and thus nothing to compare).* |
| ***2.4.1*** | | ***Risk and Impact Assessment*** | ***2.5A.2*** | | ***Risk and Impact Assessment*** | *No change* |
| 2.4.1.1 | | If there is the potential that a new mine (including associated facilities) or the expansion of an existing mine or associated facilities may require land acquisition that could result in the involuntary resettlement (for the remainder of this chapter, referred to simply as resettlement) of people, the operating company shall undertake an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people. | 2.5A.2.1 | | If there is the potential that land acquisition by/for the project/operation, or the level of direct or indirect impacts from the project/operation, could result in physical or economic displacement (hereafter referred to as 'displacement') of people, a risk and impact assessment is carried out by competent professionals, as early in the project planning as possible, to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people. The assessment:<br>a. It evaluates the potential direct and indirect risks and impacts | *References to new / existing mines removed throughout the Standard.*<br><br>*Incorporates components of 2.4.1.2. Combines previous 2.4.1.1, 2.4.2.2, 2.4.1.3, and 2.4.1.4 as the latter were qualifiers on the former.*<br><br>*e. is a new sub-requirement, aligned with inclusion of voluntary land* |

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| 2.4.1.2 | | The assessment shall:<br><br>a. Be undertaken during the early stages of mining project planning;<br><br>b. Include identification of alternative mining project designs to avoid, and if that is not possible, minimize the displacement of people;<br><br>c. Identify and analyze the social, cultural, human rights, conflict, environmental and economic risks and impacts to displaced persons and host communities for each project design alternative, paying particular attention to potential impacts on women, children, the poor and vulnerable groups; and<br><br>d. Identify measures to prevent and mitigate risks and impacts, and estimate the costs of implementing the measures. | | | related to the displacement of people;<br>b. It includes identification and systematic evaluation of project design alternatives to avoid or minimize the displacement of people if that is the most protective option for people;<br>c. It identifies and analyzes the social, cultural, human rights, conflict, environmental, and economic risks and impacts to displaced people and host communities for each alternative<br>d. It pays particular attention to potential impacts on different genders, ages, ethnicities, and any potentially underserved and/or marginalized people ;<br>e. It takes into account occupants or land users without formal land claims affected by voluntary transactions, considering both direct and indirect forms of physical and economic displacement;<br>f. It identifies measures to prevent and mitigate risks and impacts and estimates the costs of implementing the measures;<br>g. It uses a credible methodology, and the methodology used is documented; and<br>h. It is made and maintained publicly accessible, as early in the resettlement planning process as possible, and details on how it can be accessed are proactively shared with potentially affected rights-holders and stakeholders and their advisors. | *transactions in this version of the Standard (see 2.5A.7.8).*<br><br>*f. is former 2.4.1.2.d*<br><br>*g. new sub-requirement*<br><br>*h. expands on former 2.4.1.5* |
| 2.4.1.3 | | The assessment shall be undertaken by competent professionals with experience in resettlement related to large-scale development projects. | | | | |
| 2.4.1.4 | | The operating company shall document decision-making regarding alternative mining project designs and efforts to minimize resettlement. | | | | |
| 2.4.1.5 | | The assessment shall be made public, or, at minimum, be made available to potentially affected people and their advisors. | | | | |
| | | | 2.5A.2.2 | IRMA+ | *The risk and impact assessment includes consideration of impacts associated with temporary displacement associated with the exploration stages.* | *New OPTIONAL requirement - former 2.4.1.2 asked that the assessment be undertaken at the earliest stages of mining project planning; this specifies assessment of impacts associated with exploration.* |
| | | | ***2.5A.3*** | | ***Baseline Data*** | *New heading and Section to increase consistency with other chapters that separate out baseline data collection.* |

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| 2.4.3.2 | | In the absence of host government procedures, the operating company shall establish compensation eligibility criteria and a cut-off date for eligibility. Information regarding the cut-off date shall be well documented, and disseminated along with eligibility information throughout the mining project area. | 2.5A.3.1 | | Where displacement is deemed unavoidable, prior to any displacement, and prior to any survey and census activities (see 2.5A.3.2):<br>a. Clear compensation eligibility criteria and a cut-off date for eligibility are established;<br>b. Information regarding the eligibility criteria and the cut-off date is documented; and<br>c. This information (a. and b.) is proactively and preemptively communicated to the rights-holders and stakeholders affected by the project/operation; | *Aligns with former 2.4.3.3.* |
| 2.4.3.1 | | When project-related displacement is deemed unavoidable, a census shall be carried out to collect appropriate socio-economic baseline data to identify the people who will be physically or economically displaced by the project and determine who will be eligible for compensation and assistance. | 2.5A.3.2 | | Where displacement is deemed unavoidable, prior to any displacement, and after the information required in 2.5A.3.1 has been communicated to affected rights-holders and stakeholders, competent professionals carry out the following actions:<br>a. A household-level socioeconomic census to collect appropriate baseline data on the current livelihoods, standards of living, and socio-cultural practices of people who will be physically or economically displaced by the project/operation;<br>b. A land and asset survey to: 1) establish an inventory of affected lands and other assets, along with their location, status, and condition; 2) determine owners or users of the assets; 3) determine eligibility for compensation; and 4) establish a cut-off date for compensation claims; and<br>c. These censuses and surveys follow credible methodologies, and are documented. | *Expands on former 2.4.3.1, adding details associated with expectations for baseline data collection.* |
| ***2.4.3*** | | ***Resettlement and Livelihood Restoration Planning and Preparation*** | ***2.5A.4*** | | ***Resettlement and Livelihood Restoration Plan*** | *Revised heading* |

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| 2.4.3.3 | | In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum:<br><br>a. Describe how affected people will be involved in an ongoing process of consultation throughout the resettlement/livelihood restoration planning, implementation and monitoring phases;<br><br>b. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people, paying particular attention to the needs of women, the poor and vulnerable groups;<br><br>c. Describe development-related opportunities and benefits for affected people and communities;<br><br>d. Describe the methods used for valuing land and other assets;<br><br>e. Establish the compensation framework (i.e., entitlements and rates of compensation for all categories of affected people, including host communities) in a transparent, consistent, and equitable manner;<br><br>f. Include a budget and implementation schedule; and<br><br>g. Be publicly available. | 2.5A.4.1 | | In the case of physical displacement, a Resettlement Action Plan (RAP) (or equivalent) is developed by competent professionals with land acquisition/resettlement expertise. If the project involves economic displacement only, then a Livelihood Restoration Plan (LRP) (or equivalent) is developed by competent professionals. In either case, these plans:<br>a. Include a gap analysis of the country of operation's laws and international standards pertaining to compensation and restoration for displacement and outline how any gaps will be filled;<br>b. Document the socioeconomic baseline results for the area affected by land acquisition/displacement that describes the current livelihoods, standards of living, and socio-cultural practices of affected people;<br>c. Describe how affected people will be involved in an ongoing process of consultation (including access to grievance mechanisms) throughout the resettlement/livelihood restoration planning, implementation and monitoring phases, including how consultations will ensure the inclusion of potentially underserved and/or marginalized people;<br>d. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve, or at least restore, livelihoods and standards of living of displaced people, paying particular attention to the needs of potentially underserved and/or marginalized people and the potential for compensation or livelihoods support to create or exacerbate conflicts within or between communities;<br>e. Describe how livelihood restoration measures draw on consultations with affected people concerning their preferences, as well as a demonstrated understanding of local markets and feasible economic opportunities ;<br>f. Describe how the ENTITY has incorporated climate adaptation considerations into all components of RAP / LRP planning;<br>g. Describe the methods used for valuing land and other assets;<br>h. Establish the compensation framework in a transparent, consistent, and equitable manner;<br>i. Include both input- and outcome-related indicators (including gender-disaggregated indicators where appropriate), linked to adequate baseline data, to enable monitoring and evaluation of the effectiveness of measures over time in achieving the objectives of the RAP/LRP to improve, or at least restore, affected people's livelihoods and standards of living;<br>j. Assign implementation of measures to responsible staff with adequate skills and expertise;<br>k. Assign responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>l. Has clearly-defined timelines and implementation schedules in place that specify the expected outcomes for the affected people;<br>m. Maintains estimates of human resources and budget required; and<br>n. Include financing plans, to ensure that funding is available for the effective implementation of the plans. | *Expands on expectations for a RAP / LRP in former 2.4.3.3.*<br><br>*a. is a new sub-requirement, aligned with the expectation in 2.5.1.1 that legal context be investigated*<br><br>*b. makes explicit that the baseline information (already required under former 2.4.3.1, and current 2.5A.3.1) be included in the RAP / LRP.*<br><br>*c. is former 2.4.3.3.a*<br><br>*d. is former 2.4.3.3.b*<br><br>*e. was formerly implicit in former 2.4.3.3.a; details added here to ensure the entity also considers feasibility of stakeholder preferences in the particular context*<br><br>*f. is a new sub-requirement*<br><br>*g. is former 2.4.3.3.d*<br><br>*h. is former 2.4.3.3.e*<br><br>*i. is a new sub-requirement to link baseline data collection more explicitly to monitoring and evaluation*<br><br>*j. and k. are new - aligned with Standard-wide changes re: expectations for resourcing and implementation of management plans and programs.*<br><br>*m. and n. build upon forrmer 2.4.3.3.f* |

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| | | | 2.5A.4.2 | | To integrate gender progressive approaches in the development of compensation and entitlement measures as appropriate to the context, the plans also include:<br><br>a. Measures to address gender inequality in terms of access to and control of resources or assets;<br><br>b. Measures to ensure gender responsive livelihood restoration approaches; and<br><br>c. Adequate female representation on community-based resettlement, compensation, or grievance evaluation committees, if relevant. | *New requirement - aligned with Standard-wide enhanced consideration of gender.* |
| ***2.4.4*** | | ***Mitigation Measures Related to Physical Displacement*** | ***2.5A.5*** | | ***Specific Measures Related to Physical Displacement*** | *Revised heading* |
| 2.4.4.1 | | In all cases, when people are physically displaced as a result of the development or expansion of a mine or its associated facilities:<br><br>a. The operating company shall provide relocation assistance that is suited to the needs of each group of displaced peoples and is sufficient for them to improve or at least restore their standard of living at an alternative site;<br><br>b. New resettlement sites built for displaced people shall offer improved living conditions; and<br><br>c. Displaced people's preferences with respect to relocating in pre-existing communities and groups shall be taken into consideration and existing social and cultural institutions of the displaced peoples and any host communities shall be respected. | 2.5A.5.1 | | In all cases where people are physically displaced, the ENTITY has a system in place to:<br><br>a. Provide relocation assistance that is suited to the needs of each group of displaced people and is sufficient for them to improve or at least restore their standard of living at an alternative location;<br><br>b. Ensure that locations where displaced people are resettled offer improved, or at least equal, living conditions, and take into consideration displaced people's preferences with respect to relocating in pre-existing communities and groups; and<br><br>c. Respect and seek to preserve and/or reestablish existing social and cultural institutions of the displaced people and any host communities. | *Aligns with former 2.4.4.1.*<br><br>*c. new sub-requirement* |

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| 2.4.4.2 | | In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under national law:<br><br>a. The operating company shall offer the choice of replacement property (land and assets) of at least equal value and characteristics, security of tenure, and advantages of location; and<br><br>b. If cash compensation is appropriate and preferred by the affected people, compensation shall be sufficient to replace lost land and other assets at full replacement cost in local markets | 2.5A.5.2 | | In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under the country of operation's law, the ENTITY has a system in place to:<br><br>a. Offer the choice of replacement land of at least equal value and characteristics, security of tenure, and advantages of location; and<br><br>b. Offer the choice of replacement residential structures of at least equal value and characteristics. If original residential structures do not meet a minimum standard for dignified housing, the ENTITY provides replacement housing that meets these standards; and<br><br>c. As an alternative, and if cash compensation is appropriate and/or preferred by the affected person, offer compensation that is sufficient to replace lost land and residential structures at full replacement cost in local markets. | *Aligns with former 2.4.4.2, with more specificity to add clarity regarding replacement of residential structures (2.5A.5.2.b).* |
| 2.4.4.3 | | In cases where physically displaced people have no recognizable legal right or claim to the land or assets they occupy or use, the operating company shall:<br><br>a. Offer options for adequate housing with security of tenure; and<br><br>b. Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the project area prior to the cut-off date for eligibility. | 2.5A.5.3 | | In cases where physically displaced people have no recognizable legal right or claim to the land or assets that they occupy or use under the country of operation's law, the ENTITY has a system in place to:<br><br>a. Provide them with options for adequate housing with security of tenure;<br><br>b. Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the affected land, and the affected assets had been established, prior to the cut-off date for eligibility; and<br><br>c. Ensure those people are included in the collaborative development, implementation, monitoring and evaluation of the RAP. | *Aligns with former 2.4.4.3, with an new subrequirement (2.4.4.3.c) to clarify that these affected peoples must be involved in the design and monitoring of the RAP.* |
| ***2.4.5*** | | ***Mitigation Measures Related to Economic Displacement*** | ***2.5A.6*** | | ***Specific Measures Related to Economic Displacement*** | *Revised heading* |

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| 2.4.5.1 | | If project-related land acquisition or restrictions on land use result in economic displacement, regardless of whether or not the affected people are physically displaced, the operating company shall apply the following measures:<br><br>a. When commercial structures are affected, the business owners shall be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment, and the employees shall be compensated for lost income;<br><br>b. When affected people have legal rights or claims to land that are recognized or recognizable under national law, replacement property of equal or greater value shall be provided, or, where appropriate, cash compensation at full replacement cost; and<br><br>c. Economically displaced people who are without legally recognizable claims to land shall be compensated for lost assets other than land at full replacement cost. | 2.5A.6.1 | | In cases where project/operation-related land acquisition or restrictions on land use result in economic displacement in the form of displaced business operations or commercial structures, regardless of whether the affected people are physically displaced, the ENTITY has a system in place to:<br><br>a. Compensate business owners for the cost of rebuilding affected non-moveable commercial structures, for re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of any moveable business-relevant equipment, goods, or structures;<br><br>b. Compensate renters of commercial structures for lost net income during the period of transition, for the costs of the transfer and reinstallation of any moveable business-relevant equipment or goods, and provide assistance to establish a new, equivalent commercial lease with secure tenure (i.e., 12 months lease); and<br><br>c. Compensate employees of affected businesses for lost income. | *Builds upon former 2.4.5.1, addressing commercial owners and renters and employees in separate sub-requirements for clarity* |
| | | | 2.5A.6.2 | | To compensate economically displaced people, the ENTITY has a system in place to:<br><br>a. In cases where they have formal legal rights to the land or assets they use or depend on, or do not have formal legal rights but have a claim to land that is recognized or recognizable under the country of operation's law, compensate them with replacement land of equal or greater value appropriate to their livelihood;<br><br>b. As an alternative, and if cash compensation is appropriate and/or preferred by the affected person, offer cash compensation for land/improvements to the land at full replacement cost; and<br><br>c. In cases where economically displaced people have no recognizable legal right or claim to the land or assets that use or depend on, compensate them for lost assets other than land at full replacement cost. | *Expands upon former 2.4.5.1.b and c, but does not create new expectations.* |

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| 2.4.5.2 | | All economically displaced people whose livelihoods or income levels are adversely affected shall be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living, and transitional support shall be provided based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. Additionally:<br><br>a. For people whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost shall be offered as a matter of priority;<br><br>b. For people whose livelihoods are natural resource-based and where project-related restrictions on access apply, continued access to affected resources or access to alternative resources with at least equivalent livelihood-earning potential and accessibility shall be provided; and<br><br>c. If circumstances prevent the operating company from providing land or similar resources as described above, alternative income earning opportunities shall be provided to restore livelihoods | 2.5A.6.3 | | In cases where economically displaced people's livelihoods are wage-based or dependent upon access to natural resources and where project/operation-related restrictions on access or other impacts adversely affect livelihoods or income levels, the ENTITY has a system in place to:<br><br>a. Prioritize the provision of continued access to affected resources;<br><br>b. Where access to affected resources is not possible, provide access to alternative resources with at least equivalent livelihood-earning potential and accessibility; and<br><br>c. Where circumstances prevent the ENTITY from providing land or similar resources, provide alternative income earning opportunities to restore livelihoods that are feasible and agreed to by affected people. | *Reduced redundancy in former 2.4.5.2.* |
| ***2.4.6*** | | ***Resettlement and Livelihood Restoration Agreements and Implementation*** | ***2.5A.7*** | | ***Resettlement and Livelihood Restoration Agreements*** | *Revised heading* |
| 2.4.6.1 | | In order to be certified by IRMA, if a new project will require the displacement of indigenous peoples the operating company shall obtain the free, prior and informed consent (FPIC) of affected indigenous communities before proceeding with the resettlement and mine development (as per IRMA Chapter 2.2). | 2.5A.7.1 | Critical | The ENTITY can demonstrate that, if proposed activities require the displacement of Indigenous Peoples (identified as per 1.2.1.2 and 1.3.2.3) from their lands, or economically displace them from pursuing their traditional livelihoods, it only proceeds with the resettlement and proposed activities if, and when, it has obtained the free, prior and informed consent of affected Indigenous Peoples. | *Adaptation of former 2.4.6.1, in alignment with other Chapters were a similar requirement (i.e. needing to fully meet all critical requirements of Chapter 2.2) has been included.*<br><br>*Made critical for consistency with Chapter 2.2 on Indigenous Peoples and FPIC.* |
| 2.4.6.5 | | Forced evictions shall not be carried except in accordance with law and international best practice, and the requirements of this chapter. | 2.5A.7.2 | Critical | The ENTITY can demonstrate that:<br>a. It never carried out, and does not plan to carry out, forced evictions or illegal expropriation, defined as the permanent or temporary removal against their will of people from their homes and/or land which they occupy;<br>b. It takes possession of acquired land and related assets only after full compensation has been made available; and<br>c. It takes possession of acquired land and related assets only after replacement housing/lands/assets and moving allowances | *Adjusted language of former 2.4.6.5 to distinguish between illegal forced evictions / illegal expropriation (not permissible) and 'legal' forced evictions, meaning those that occur at the end of a legal expropriation process. The latter was the intent of former 2.4.6.5 but the phrasing was misleading.* |

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| 2.4.6.6 | | The operating company shall take possession of acquired land and related assets only after compensation has been made available, and, where applicable, resettlement sites and moving allowances have been provided to the displaced people. | | | have been provided to the displaced people, where applicable; and<br>d. It prioritizes the avoidance of temporary transitional resettlement. | *d. is new; 2018 Standard did not address temporary transitional resettlement.* |
| 2.4.6.3 | | Prior to negotiating with affected people, the operating company shall provide or facilitate access to resources necessary to participate in an informed manner. This shall include, at minimum:<br><br>a. Copies of RAP and/or LRP;<br><br>b. Details on what to expect at various stages of the resettlement or livelihood restoration process (e.g., when an offer will be made to them, how long they will have to respond, how to access the grievance mechanism if they wish to appeal property or asset valuations, legal procedures to be followed if negotiations fail); and<br><br>c. Independent legal experts or others to ensure that affected people understand the content of any proposed agreement and associated information. | 2.5A.7.3 | | In accordance with Chapter 1.2, prior to negotiating with affected people, the ENTITY provides them, or facilitates their access to, resources necessary to participate in an informed manner. This includes:<br>a. Copies of the RAP/LRP (based on results of consultations outlined in Section 2.5A.8);<br>b. Details on what to expect at various stages of the resettlement or livelihood restoration process ;<br>c. Details on the input- and outcome-related indicators (including gender-disaggregated indicators where appropriate) used to evaluate the effectiveness of measures over time; and<br>d. Access to independent legal experts or other advisors to ensure that affected people understand the content of any proposed agreement and associated information. | *c. adjusted slightly from former 2.4.6.3.b to reflect alterations to other requirements* |
| | | | 2.5A.7.4 | | Where temporary transitional resettlement cannot be avoided, the ENTITY:<br>a. Documents and shares with affected people a clear explanation for why temporary transitional resettlement is the only feasible option;<br>b. Ensures that affected people have been consulted on the implications of transitional temporary relocation;<br>c. Offers to affected people the option for independent legal or professional advice;<br>d. Ensures that the transitional temporary resettlement only occurs if, and after, affected people have formally agreed to it;<br>e. Ensures that transitional temporary residential structures and replacement lands meet all the applicable requirements of this Chapter ;<br>f. Ensures that transitional temporary resettlement is time-bound and the timeline has been agreed upon with affected people; and<br>g. Ensures that affected people are duly compensated for the multiple disruptions to their lives. | *New requirement - 2018 Standard did not address temporary transitional resettlement.* |

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| | | | 2.5A.7.5 | | In the case of voluntary displacement (willing buyer-seller transactions where there is no recourse to expropriation), the ENTITY has a system in place to ensure that:<br>a. All land transactions are documented;<br>b. Affected people are paid a fair market price, using up-to-date and credible data;<br>c. Landowners (sellers) have sufficient information about project timelines and the various options available to them, including the voluntary nature of the sale, to make an informed decision;<br>d. Decisions are made free of coercion and on a timeline conducive to informed decision-making and consultation with family members/legal experts as necessary;<br>e. If any shortcomings are identified, the ENTITY undertakes reasonable remediation measures to address, to the extent possible ; and<br>f. Informal land occupants are identified and considered in a way that is consistent with the contents of this chapter relating to involuntarily displaced people as well as the Chapter 1.3 on Human Rights Due Diligence. | *New requirement - 2018 Standard did not address voluntary resettlement.* |

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| 2.4.6.4 | | In cases where affected people reject compensation offers that meet the requirements of this chapter and, as a result, expropriation or other legal procedures are initiated, the operating company shall explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring to mitigate the risk of impoverishment of those affected people. | 2.5A.7.6 | | In cases where affected people reject compensation offers that meet the requirements of this Chapter and where subsequent arbitration efforts fail and, as a result, legal expropriation or other legal procedures are initiated, the ENTITY has a system in place to explore opportunities to collaborate with the responsible government agency, and, if and when permitted by the agency, to play an active role in, and make good faith efforts to, ensuring that people are only removed from their land as follows :<br>a. Affected people are provided fair compensation for their lands and any eligible assets on those lands;<br>b. Affected people are provided with clear and timely information on the procedures for and timing of proposed evictions<br>c. Affected people are given adequate and reasonable notice prior to the scheduled date of eviction;<br>d. Government officials or their representatives, and any relevant local authorities, are present during the removal;<br>e. Removals are not carried out in in particularly bad weather or at night unless the affected people consent to these conditions;<br>f. Information is provided about legal remedies and where possible, legal aid to people who are in need of it to seek redress from the courts;<br>g. All people carrying out the removal are identified and trained on human rights and the appropriate use of force;<br>h. Procedures outlining appropriate measures to take in case of conflicts or violent opposition to the removals are established, and appropriate personnel trained on them; and<br>i. Special considerations are made for potentially underserved and/or marginalized people in all of the above (a. to i.), to the greatest extent possible. | *Expands upon former 2.4.6.4, adding in details concering what actions specifically can accomplish the objective of 'mitigating the risk of impoverishment' stated in former 2.4.6.4. and generally to align expropriation with international human rights laws and expectations.* |
| ***2.4.2*** | | ***Community Engagement*** | ***2.5A.8*** | | ***Meaningful Engagement with Stakeholders*** | *Revised heading* |

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| 2.4.2.1 | | The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during:<br><br>a. The assessment of displacement and resettlement risks and impacts, including the consideration of alternative mining project designs to avoid or minimize resettlement;<br><br>b. The development of resettlement and livelihood options; and<br><br>c. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP). | 2.5A.8.1 | | In accordance with Chapter 1.2, the ENTITY proactively shares relevant information and conducts consultations with potentially affected people, including host communities, to inform:<br><br>a. The assessment of displacement and resettlement risks and impacts, required in 2.5A.2, including the consideration of alternative project designs to avoid or minimize resettlement;<br><br>b. The development, implementation, monitoring, and evaluation, and review of the Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP), as per 2.5A.4, 2.5A.5, 2.5A.6, 2.5A.7, 2.5A.9, and 2.5A.10, including to soliciting input on resettlement and livelihood restoration options; and<br><br>c. Consultations and collaborative decision-making take place in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people. | *c. added in alignment with enhanced focus on potentially underserved and/or marginalized people Standard-wide* |
| 2.4.2.2 | | The operating company shall facilitate access, if desired by potentially affected people and communities, including host communities, to independent legal or other expert advice from the earliest stages of project design and assessment, through monitoring and evaluation of the resettlement process. | 2.5A.8.2 | | In accordance with Chapter 1.2, the ENTITY has a system in place to ensure that potentially affected people, including host communities:<br><br>a. If necessary, are provided with resources for capacity building and training to enable meaningful stakeholder engagement ;<br><br>b. Are actively and explicitly offered access to independent legal or other expert advice of their own choosing, from the earliest stages of project design, and throughout monitoring and evaluation of the resettlement process; and<br><br>c. Are offered opportunities to receive funding to enable them to select and consult with such independent advisors, including from government agencies and/or non-governmental organizations. | *Expands upon former 2.4.2.2.*<br><br>*b. is aligned with former 2.4.2.2*<br><br>*a and c are new, to align with expectations related to stakeholder engagement in other chapters.* |

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| 2.4.2.3 | | People from affected communities, including host communities, shall have access to an effective mechanism to raise and seek recourse for concerns or grievances related to displacement and resettlement. | 2.5A.8.3 | | Affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, have access to a grievance mechanism to raise, and seek resolution or remedy for, complaints and grievances specifically related to displacement and resettlement, as follows:<br>a. A grievance mechanism through which affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, can raise, and seek resolution or remedy for, complaints and grievances specifically related to displacement and resettlement, are in place;<br>b. This grievance mechanism is rights-compatible ;<br>c. Affected rights-holders and stakeholders have been informed about the existence and functioning of this grievance mechanism, as well as of other relevant mechanisms ;<br>d. If the operational-level grievance mechanism developed as per Chapter 1.6 (Complaints and Grievance Mechanism and Access to Remedy) is used as the mechanism to receive complaints and grievance specifically related to displacement and resettlement, the Entity fully meets all requirements in Chapter 1.6; and<br>e. If a separate mechanism is created to handle only human rights complaints and grievances, it is established and management in a manner that fully meets all requirements in Chapter 1.6. | *Aligned with former 2.4.2.3*<br><br>*d. and e. are new to align with approach throughout the Standard (incl. cross-referencing Chapter 1.6)* |
| ***2.4.7*** | | ***Resettlement and Livelihood Restoration Monitoring and Evaluation*** | ***2.5A.9*** | | ***Monitoring and Evaluation*** | *Revised heading* |
| 2.4.7.1 | Critical | The operating company shall establish and implement procedures to monitor and evaluate the implementation of a Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP), and take corrective action as necessary until the provisions of the RAP/LRP and the objectives of this chapter have been met. | 2.5A.9.1 | | To monitor and evaluate the effectiveness and appropriateness of the RAP and/or LRP, at least annually, or more frequently if requested by affected people, the ENTITY:<br><br>a. Tracks and documents its performance, over successive time periods, against the success criteria and indicators defined in 2.5A.4.4;<br><br>b. Tracks and documents how the measures and actions developed and implemented as per 2.5A.4, 2.5A.5, 2.5A.6, and 2.5A.7 are effectively mitigating the negative impacts of displacement and improving, or at least restoring, livelihoods and standards of living of displaced people; and<br><br>c. Disaggregates the data according to gender-specific indicators, if and where applicable. | *Expands on what constitutes a monitoring and evaluation process, per the intent of former 2.4.7.1.*<br><br>*c. is a new sub-requirement, aligned with increased focus on gender throughout the Standard* |

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| | | | 2.5A.9.2 | | The monitoring and evaluation process:<br><br>a. Encourages and facilitates joint tracking or joint fact-finding with affected and displaced people, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, as per Chapter 1.2;<br><br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected people; and<br><br>c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of people. | *Expands on what constitutes a monitoring and evaluation process, per the intent of former 2.4.7.1.*<br><br>*c. is a new sub-requirement, aligned with increased focus throughout the Standard on data security* |
| | | | ***2.5A.10*** | | ***Continuous Improvement and Completion*** | *New heading and Section to increase consistency with other chapters.* |
| 2.4.7.2 | | Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP. | 2.5A.10.1 | Critical | At least annually, or more frequently if requested by affected people, and until the provisions of the RAP/LRP and the objectives of this Sub-Chapter have all been met, the ENTITY collaborates with affected people to review:<br><br>a. The monitoring and evaluation results, informed by internal and external feedback, as per Section 2.5A.9;<br><br>b. Any displacement-related grievances and the functioning of the relevant grievance mechanism/s required in 2.5A.8.3 (see also Section 1.6.4); and<br><br>c. Its effectiveness in mitigating the negative impacts of displacement and improving, or at least restoring, livelihoods and standards of living of displaced people (informed by monitoring and evaluation required in 2.5A.9.1). | *b. added to this Chapter, but is already required under Chatper 1.6 on grievance redress, therefore not adding additional burden on entities* |

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| 2.4.7.3 | | Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company:<br><br>a. Shall retain competent professionals to verify the operating company's monitoring information and provide advice on additional steps needed to achieve compliance with the requirements of this chapter; and<br><br>b. Shall commission a completion audit that:<br><br>i. Occurs after the company deems that its RAP/LRP has been fully and successfully implemented;<br><br>ii. Is carried out by external resettlement experts;<br><br>iii. Includes, at a minimum, a review of the mitigation measures implemented by the operating company, a comparison of implementation outcomes against the requirements of this chapter, and a determination as to whether the commitments made in the RAP/LRP have been delivered and the monitoring process can therefore be terminated; and<br><br>iv. Is made available to affected people and their advisors. | 2.5A.10.2 | | If the monitoring and evaluation process required in 2.5A.9, and/or the review process required in 2.5A.10.1, and/or credible independent sources of information demonstrate that the ENTITY fails to effectively mitigate the negative impacts of displacement and to improve, or at least restore, livelihoods and standards of living of displaced people, the ENTITY:<br><br>a. Develops and implements time-bound corrective measures to update, if necessary, its risk and impact assessment in accordance with Section 2.5A.2, and baseline data in accordance with Section 2.5A.3;<br><br>b. Develops and implements time-bound corrective measures to update, if necessary, its RAP and LRP in accordance with Sections 2.5A.4, 2.5A.5, 2.5A.6, and 2.5A.7; and<br><br>c. Develops and implements time-bound corrective measures to update, if necessary, its monitoring and evaluation processes in accordance with Section 2.5A.9. | *Draws on original intent of former 2.4.7.3.a to require identification of gaps in performance vis-à-vis the RAP / LRP and corrective action development and implementation.* |
| | | | 2.5A.10.3 | | When the ENTITY determines that its RAP/LRP has been successfully and fully implemented, a completion audit is commissioned, and undertaken by competent professionals, to determine if the objectives of the RAP/LRP have been met. The completion audit:<br><br>a. Includes a review of the mitigation measures implemented by the ENTITY and a comparison of implementation outcomes against the requirements and success criteria of this RAP/LRP;<br><br>b. Clearly demonstrates that the objectives of the RAP/LRP have been successfully met (and therefore the monitoring process can be ceased); and<br><br>c. If the completion audit determines that the objectives of the RAP and/or LRP have not been met, a corrective action plan is developed and implemented by competent professionals, in accordance with all relevant requirements of this Sub-Chapter (resulting in a second completion audit being commissioned and undertaken when all the objectives of the RAP and/or LRP have been met). | *Removed caveat from former 2.4.7.3 that these expectations are only in cases where "resettlement is deemed to pose a risk of significant adverse social impacts" as all resettlements involve such a risk and therefore should conduct a completion audit.*<br><br>*Guidance will clarify that if the scope / scale of resettlement is such that regular monitoring and evaluation can serve the same purpose as a formal completion audit (i.e. small number of households affected means regular contact with each of them sufficient to determine reestablishment is routine M&E) then those processes can be evaluated for this requirement as long as they fulfil the objectives here.* |

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| | | | ***2.5A.11*** | | ***Information-Sharing and Public Reporting*** | *New heading and Section to increase consistency with other chapters.* |
| 2.4.1.5 | | The assessment shall be made public, or, at minimum, be made available to potentially affected people and their advisors. | 2.5A.11.1 | | In accordance with Chapter 1.2, the ENTITY proactively shares with affected people and their advisors, and makes and maintains publicly accessible:<br><br>a. Any RAP and LRP, in full text, including annexes and amendments.<br><br>b. An annual report on progress made on the implementation of the RAP/LRP; and<br><br>c. The RAP/LRP completion audit/s. | *Combines four former requirements, which collectively call for various documents / information to be shared or made public at various points in the process.* |
| 2.4.2.1 | | The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during:<br><br>... c. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP). | | | | |
| 2.4.3.3 | | In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum:<br><br>.... g. Be publicly available. | | | | |
| 2.4.7.3 | | Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company:<br><br>… iv. Is made available to affected people and their advisors. | | | | |
| 2.4.6.2 | | If a new mine will require the displacement of non-indigenous peoples, the operating company shall make a good faith effort to negotiate agreements with all households that will be physically or economically displaced by the mining project before proceeding with the resettlement, even if the company has the legal means to acquire land or restrict land use without their consent. | | | | *Deleted - nothing to be evaluated that was independent of other requirements, i.e., the evaluation of the requirement was the culmination of all other requirements because the entire chapter is premised on negotiations occurring.* |
| 2.4.6.7 | | The operating company shall document all transactions to acquire land rights, and all compensation measures and relocation activities. | | | | *Deleted - redundant as implicitly required in order for the entity to be able to provide evidence for most of the requirements in this chapter,* |
| ***2.4.8*** | | ***Private Sector Responsibilities Under Government-Managed Resettlement*** | | | | *Deleted section as both requirements also deleted (see below).* |
| 2.4.8.1 | | Where land acquisition and resettlement are the responsibility of the government, the operating company shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this chapter. | | | | *Deleted - instead indicated at the outset of the chapter ENTITY obligations in these cases to avoid putting the weight of the entire chapter on this and former 2.4.8.2 below.* |

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| 2.4.8.2 | | The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the operating company shall prepare a supplemental plan that, together with the documents prepared by the responsible government agency, shall address the relevant requirements of this chapter. The company shall include in its supplemental plan, at a minimum:<br><br>a. Identification of affected people and impacts;<br><br>b. A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations;<br><br>c. The supplemental measures to achieve the requirements of this chapter in a manner that is permitted by the responsible agency and an implementation schedule; and<br><br>d. The financial and implementation responsibilities of the operating company in the execution of its supplemental plan. | | | | *See above.* |
| | | | ***SUB-CHAPTER 2.5B*** | | ***For Remediating Historical (before 2012) Land Acquisition, Displacement, and Resettlement*** | *New Sub-Chapter* |
| | | | ***2.5B.2*** | | ***Mapping and Impact Assessment*** | *New Section* |
| | | | ***2.5B.3*** | | ***Baseline Data*** | *New Section* |
| | | | ***2.5B.4*** | | ***Displacement Remediation Plan*** | *New Section* |
| | | | ***2.5B.5*** | | ***Displacement Remediation Agreements*** | *New Section* |
| | | | ***2.5B.6*** | | ***Meaningful Engagement with Stakeholders*** | *New Section* |
| | | | ***2.5B.7*** | | ***Monitoring and Evaluation*** | *New Section* |
| | | | ***2.5B.8*** | | ***Continuous Improvement and Completion*** | *New Section* |
| | | | ***2.5B.9*** | | ***Information-Sharing and Public Reporting*** | *New Section* |

# Chapter 2.6 Emergency Preparedness, Response, and Recovery

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| **2.5** | | **Emergency Preparedness and Response** | **2.6** | | **Emergency Preparedness and Response** | |
| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| | | | ***2.6.1*** | | ***Identification of Key Emergency Response Stakeholders*** | *New section* |
| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | 2.6.1.1 | | A process is undertaken by competent professionals to identify and document key stakeholders that will be involved in emergency preparedness and response planning (hereafter referred to as "key stakeholders") for any potential industrial accident and unwanted event related to the site and associated facilities, including among:<br>a. Employees, contractors, suppliers, and workers' health and safety representatives;<br>b. Public sector agencies, first responders, and local authorities and institutions; and<br>c. Rights-holders, stakeholders, individuals, businesses, and organizations that may be potentially affected by those potential industrial accidents and unwanted events . | *This requirement is based on Step 1 in the APELL guidelines. It is therefore not a new expectation; rather, IRMA has explicitly included key expectations from APELL rather than referencing it externally, in order to increase consistency of application and interpretation.* |
| | | | 2.6.1.2 | | Building on 2.6.1.1, the ENTITY consults and collaborates with key stakeholders to:<br>a. Determine and agree on their roles and responsibilities with respect to emergency preparedness and response;<br>b. Determine the current resources available for key stakeholders to respond to emergencies related to the site and its associated facilities, and identify any deficiency in resource or capacity in community response capabilities; and<br>c. If deficiencies in resources or weaknesses in community response capabilities are identified, develop and document a plan to build capacity and resources necessary to facilitate effective emergency preparedness and response. | *This requirement is based on Step 1 in the APELL guidelines. It is therefore not a new expectation; rather, IRMA has explicitly included key expectations from APELL rather than referencing it externally, in order to increase consistency of application and interpretation.* |
| | | | ***2.6.2*** | | ***Assessment of Risks and Emergency Scenarios*** | *New section* |
| | | | 2.6.2.1 | | Building on the other relevant scoping and risk and impact assessment processes :<br>a. An assessment of risk and emergency scenarios is carried out by competent professionals, in collaboration with key stakeholders, to compile a comprehensive list of foreseeable industrial accidents and foreseeable unwanted events related to the site and its associated facilities that could pose risks to individuals or communities , cultural heritage, property, or the environment ;<br>b. This assessment evaluates the level of risk for each potential emergency scenario based on the potential severity of consequence and probability of occurrence of each possible accident or unwanted event identified ;<br>c. It identifies, and agrees with key stakeholders, what the key emergency scenarios are to prioritize them in the emergency preparedness and response plan (or equivalent) ;<br>d. It identifies measures to prevent the negative consequences that could occur from all potential key emergency scenarios, and, where prevention is not possible, measures to minimize them; and<br>e. If the prevention or mitigation measures identified in d. include emergency evacuations, the assessment identifies any facility and area where evacuation may be challenging . | *This requirement is based on Step 2 in the APELL guidelines. It is therefore not a new expectation (beyond the explicit inclusion of cultural heritage reference); rather, IRMA has explicitly included key expectations from APELL rather than referencing it externally, in order to increase consistency of application and interpretation.* |

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| | | | 2.6.2.2 | | If there is any proposed or existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1):<br>a. The identification and assessment of emergency scenarios take into account all those credible failure modes, including sunny-day and rainy-day failure scenarios, as appropriate;<br>b. The ENTITY proactively shares with key stakeholders information about: 1) any emergency scenario related to those facilities; 2) outcomes of the facility breach analyses; 3) facility consequence classifications; and 4) the physical areas potentially affected by a failure;<br>c. Proactively shares this information more widely with affected rights-holders and stakeholders; and<br>d. Ensures this information is used to inform the collaborative assessment process required in 2.6.2.1. | *Expands upon the intent of APELL, specifically for mine waste facilities that present stability risks; APELL Step 8 (communication and training), Step 9 (establish procedures for preiodic testing, review, and updating of plan), and Step 10 (communications with stakeholders).* |
| | | | 2.6.2.3 | IRMA+ | If there are any facilities other than tailings and waste facilities where one or more credible failure modes have been identified (see 4.2.18.2), the ENTITY conforms with 2.6.2.2 for those facilities too. | *New OPTIONAL requirement* |
| ***2.5.1*** | | ***Emergency Response Plan*** | 2.6.3 | | ***Emergency Preparedness and Response Plan*** | *Revised heading* |
| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | 2.6.3.1 | Critical | Building on the assessment of risk and emergency scenarios required in 2.6.2, if potential industrial accident or unwanted event related to the site or its associated facilities that may result in adverse impacts to individuals or communities, cultural heritage, property, or the environment are identified, emergency preparedness and response plan/s (or equivalent) is developed and documented by competent professionals, as follows:<br>a. The plan is developed in collaboration with the key stakeholders (identified as per 2.6.1.1);<br>b. The plan includes warning stages, if appropriate, and response measures to be taken accordingly, in the event that industrial accidents or unwanted events occur ;<br>c. It includes immediate measures to manage a disaster, save lives, protect individuals and groups that would be disproportionately affected , provide medical assistance, supply humanitarian aid, and minimize harm to animals and the environment;<br>d. It provides clear definition of roles, responsibilities and relationships of all (internal and external) stakeholders responsible for the development and/or implementation of (some or all of) the plan and associated procedures;<br>e. It includes contact information for all key stakeholders and the measures to be taken to communicate with them if an industrial accident or unwanted event were to occur ;<br>f. It assigns implementation of preparedness measures and response measures to responsible staff with adequate skills and expertise, and to relevant key stakeholders;<br>g. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping;<br>h. It includes an implementation schedule for preparedness measures;<br>i. It maintains estimates of human resources and budget required for the implementation of both preparedness measures and response measures;<br>j. It includes a financing plan in place to ensure that funding is available for the effective implementation of the preparedness measures; and<br>k. The ENTITY makes and maintains publicly accessible the plan , in languages and formats that are understandable to affected rights-holders and stakeholders, in accordance with Section 1.2.3. | *Builds on intent of former 2.5.1.1 and 2.5.2.1 (consultation with stakeholders); adds details to enhance robustness and clarity about what must be included in a management plan, aligned with similar changes in other chapters.*<br><br>*b., c. and d. are based on APELL Step 1 (identification of roles & responsibilities), 3 (communications re: emergency plans), and 4 (emergency plans), as well as Section 7 of the APELL guidelines which lays out components of an emergency response plan.*<br><br>*e. captures intent of former 2.5.1.2.b (update of communications contacts for emergency plan)*<br><br>*f. and g. draw on APELL Section 7 (components of an emergency management plan).*<br><br>*h. to j. draw on APELL Step 5 (match tasks and resources) in alignment with Standard-wide changes to expectations re: resourcing and implementation of management plans.*<br><br>*k. draws on APELL content concerning communications of emergency plans* |
| 2.5.2.1 | Critical | The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises. | | | | |
| 2.5.1.2 | | The operating company shall:<br><br>a. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and<br><br>b. Update the communications contacts of the emergency response plan at least annually. | | | | |

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| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | 2.6.3.2 | | To manage off-site and on-site spills, leaks, or releases of hazardous materials and hazardous wastes (identified as per Chapter 4.1):<br>a. The emergency preparedness and response plan/s includes specific spill preparedness and response measures ;<br>b. These measures are developed in collaboration with the key stakeholders (identified as per 2.6.1.1);<br>c. They include instructions for evacuations, if relevant ;<br>d. These measures include regular training of relevant workers, contractors, and emergency response providers, on procedures, methods and materials used for containment, clean-up, decontamination, and remediation ;<br>e. They also includes regular training on appropriate personal protective equipment and clothing for workers or contractors engaged in spill response;<br>f. They also include regular training on any relevant fire-fighting measures, including: 1) Appropriate extinguishing equipment, and information about equipment that is not appropriate for a particular situation; and 2) Special protective equipment or precautions related to hazardous combustion products; and<br>g. They also include regular training on relevant first-aid instructions for exposures that may occur during spill response, including: 1) Instructions on where to locate safety data sheets and other relevant information related to the chemicals of concerns; 2) Instructions for all relevant routes of exposure for relevant chemicals (inhalation, skin and eye contact, and ingestion); 3) Description of likely symptoms or effects related to exposure to relevant chemicals, including symptoms that are acute or delayed; and 4) Instructions on any immediate medical care and treatment(s). | *Builds on intent of former 4.1.7.3 - intended to cover spills / leaks / release of hazardous materials and wastes more specifically in this chapter.*<br><br>*Also incorporates content from APELL:*<br>*a. and b. draw on several steps in APELL referring to co-creation of plans*<br><br>*d. which calls for training of relevant stakeholders - this builds on content of APELL Step 8*<br><br>*c. also draws on content throughout APELL which references evacuations as one of the possible measures that must be prepared for, communicated on, and planned / resourced / trained.*<br><br>*e. to g. build on guidelines of APELL (see specifically Section 7 of APELL guidelines that outline the components of an emergency response plan).* |
| 4.1.7.3. | | Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. | | | | |
| | | | ***2.6.4*** | | ***Specific Training and Testing Measures*** | *New heading* |
| 2.5.1.2 | | The operating company shall:<br><br>a. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and<br><br>b. Update the communications contacts of the emergency response plan at least annually. | 2.6.4.1 | Critical | The following types of training and testing are performed and documented to test the emergency response plans required in 2.6.3:<br>a. At least annually, and without delay if the ENTITY has developed or undertaken significant modifications to the plan, tabletop discussions that include ENTITY personnel responsible for emergency response, local emergency response personnel, and other key community stakeholders, and, if relevant, testing of early warning systems in communities ;<br>b. At least every three years, and without delay if the ENTITY has developed or undertaken significant modifications to the plan, a full, on-the-ground, emergency response simulation with the ENTITY's personnel responsible for emergency response, local emergency response personnel, key community stakeholders, and where possible the wider affected population; and<br>c. Lessons learned and identified corrective measures are documented. | *Expands upon the intent of former 2.5.1.2.a (regular testing of emergency response plan) and integrates components of APELL Step 9 which asks for regular and event-triggered review, update, and testing of plans to be specified, and regular testing and evaluation of plans.* |
| ***2.5.2*** | | ***Community and Worker Consultation*** | | | | |

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| 2.5.2.1 | Critical | The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises. | 2.6.4.2 | | At least annually, or more frequently if requested by affected rights-holders and stakeholders, the ENTITY:<br>a. Undertakes public awareness-raising efforts to proactively share information with potentially affected people, in languages and formats that are culturally appropriate and easily accessible to them , about the hazards and risks related to the site and its associated facilities, and proposed emergency response measures;<br>b. Proactively shares information with local authorities and emergency services about the hazardous properties, and health and environmental effects, of the hazardous materials and hazardous wastes that may pose a risk to communities, workers or the environment if there were to be an incident or spill; and<br>c. Ensures that relevant spokespeople within the ENTITY and the community receive training on emergency-response-related communications and media engagement. | *Significantly expands upon the intent of former 2.5.2.1 (participation of stakeholders in emergency response planning and testing) and incorporates APELL Step 10 (communications with stakeholders).*<br><br>*c. is from APELL Step 8 (communication and training)* |
| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | ***2.6.5*** | | ***Monitoring and Evaluation*** | *New heading* |
| | | | 2.6.5.1 | | To monitor and evaluate the effectiveness and appropriateness of its emergency preparedness measures and response measures to prevent the negative consequences that could occur from all potential key emergency scenarios, the ENTITY, at least annually:<br>a. Tracks and documents its performance on ensuring preparedness measures, including regular training and testing, against its implementation schedule;<br>b. Tracks and documents changes in personnel and key stakeholders and/or changes in contact information; and<br>c. Includes continuous feedback from internal and external sources in the monitoring and evaluation, including from key stakeholders and affected communities, in accordance with Chapter 1.2. | *Draws on APELL Step 9 (periodic testing, review, and updating of plans) including recognizing implications of staff turnover, and aligned with Plan-Do-Check-Act approach integrated Standard-wide.* |
| | | | ***2.6.6*** | | ***Continuous Improvement*** | *New heading* |
| | | | 2.6.6.1 | | At least annually, but without undue delay after a significant change, the ENTITY:<br>a. Reviews the monitoring and evaluation results, informed by internal and external feedback, as per Section 2.6.5;<br>b. Reviews any emergency-related or disaster-related grievances (see Section 1.6.4);<br>c. Reviews challenges encountered, deficiencies, and lessons learned, from: 1) tabletop discussions and emergency response simulations required in 2.6.4.1; and 2) Actual disasters, accidents or incidents that occurred at the site or other similar sites;<br>d. Updates, if necessary , contact information for key stakeholders listed in the emergency response plan;<br>e. Develops and implements time-bound corrective measures to update, if necessary , its assessment of risks and emergency scenarios in accordance with Section 2.6.2, and<br>f. Develops and implements time-bound corrective measures to update, if necessary , its emergency preparedness and response plan in accordance with Section 2.6.3, including the specific training and testing measures required in 2.6.4. | *Draws on APELL Step 9 (periodic testing, review, and updating of plans), including recognizing implications of staff turnover (and need to update contacts associated with plan more generally), and aligned with Plan-Do-Check-Act approach integrated Standard-wide.*<br><br>*b. new sub-requirement, consistent with the rest of the Standard* |
| | | | ***2.6.7*** | | ***Response and Recovery*** | *New heading* |

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| | | | 2.6.7.1 | | The ENTITY has a system in place to ensure that, in the event of an actual emergency situation caused by an industrial accident or unwanted event related to the site or its associated facilities:<br>a. Relevant emergency preparedness and response plan/s are implemented;<br>b. Immediate measures are taken to manage the disaster, save lives, provide medical assistance, and supply humanitarian aid;<br>c. Immediate measures are taken to protect individuals and groups that would be disproportionately affected ;<br>d. Immediate measures are taken to minimize harm to animals and the environment. | *Aligned with Plan-Do-Check-Act approach integrated Standard-wide; also draws on intent of APELL Section 7 (components of an emergency response plan, section entitled "Clean-up, remediation, procedure for returning to normal operations").* |
| | | | 2.6.7.2 | | If an actual emergency situation occurs (or has occurred), and once the critical elements of the disaster have been stabilized, the ENTITY contributes to long-term restoration, reconstruction and recovery effort, as follows:<br>a. The ENTITY offers funding to affected people to select and hire competent professionals of their own choosing to serve as independent legal and/or technical advisors to assist them in long-term recovery activities;<br>b. The ENTITY explicitly states that participation in a joint recovery effort does not preclude affected people from seeking redress, including compensation for impacts, through administrative, judicial, or other non-judicial remedies for impacts related to the disaster/crisis;<br>c. In the case of temporary or permanent physical or economic displacement related to the disaster/crisis situation, the ENTITY undertakes measures in alignment with Chapter 2.5;<br>d. The ENTITY offers to fund and collaborate with affected people and their advisors, and other key stakeholders , to jointly develop and implement an action plan (or equivalent) to provide, as needed, restoration, reconstruction and recovery;<br>e. This action plan includes a process to collaboratively assess the short-, medium-, and long-term social, environmental and local economic impacts;<br>f. This action plan includes collaboratively-designed measures and associated objectives for restoration, reconstruction and recovery activities;<br>g. This action plan includes collaboratively-designed performance indicators to enable measurement of progress toward those objectives (f.) over time;<br>h. This action plan enables participation of affected people in the restoration, reconstruction and recovery activities if they so desire; and<br>i. This action plan includes a program to monitor and evaluate the effectiveness of the measures (f.), including against the indicators for the defined measures (g.). | *New requirement - aligned with Plan-Do-Check-Act approach integrated Standard-wide.* |
| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | 2.6.7.3 | | If an actual emergency situation occurs (or has occurred), on a schedule agreed with affected peoples and their advisors, and other key stakeholders , the ENTITY:<br>a. Reviews the monitoring data related to the action plan ;<br>b. Evaluates if measures in the action plan are being effectively implemented; and<br>c. If the measures are not effectively implemented, or are not effective, the ENTITY, collaborates with affected people and their advisors, and other key stakeholders to develop and implement corrective measures to achieve the objectives of restoration, reconstruction and recovery activities. | *Aligned with Plan-Do-Check-Act approach integrated Standard-wide; also draws on intent of APELL Section 7 (components of an emergency response plan, section entitled "Clean-up, remediation, procedure for returning to normal operations" which mentions post-emergency evaluation of plan effectiveness and options for clean-up).* |
| ***2.5.3*** | | ***Public Liability Accident Insurance*** | ***2.6.8*** | | ***Public Liability Accident Insurance*** | *No change* |

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| 2.5.3.1 | | All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events. | 2.6.8.1 | | The ENTITY:<br>a. Has financial assurance in place for disaster management and recovery in case of potential industrial accident or unwanted event related to the site and associated facilities ;<br>b. Makes and maintains publicly accessible name of the insurer/s, the facilities covered, and the duration of this assurance;<br>c. Makes and maintains publicly accessible the amount of this assurance, and the nature of the management and recovery measures it can cover; and<br>d. Has clause/s and/or mechanism/s in place to ensure the insurance coverage remains in force for as long as the ENTITY has legal responsibility for the site . | *Combines content from former 2.5.3.1-2.5.3.3. Adds that the financial assurance would also need to cover long-term recovery efforts.* |
| 2.5.3.2 | | The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others. | | | | |
| 2.5.3.3 | | The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property. | | | | |

# Chapter 2.7 Concurrent Reclamation, Closure, and Post-Closure

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **2.6** | | **Planning and Financing Reclamation and Closure** | **2.7** | | **Concurrent Reclamation, Closure, and Post-Closure** | *Revised to emphasize the need for concurrent reclamation, and explicitly included "post-closure".* |
| ***2.6.2*** | | ***Reclamation and Closure Planning*** | ***2.7.1*** | | ***Planning for Concurrent Reclamation, Closure, and Post-Closure*** | *Revised to emphasize the need for concurrent reclamation, and explicitly included "post-closure".* |
| 2.6.2.1 | Critical | Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use. | 2.7.1.1 | Critical | Building on the Scoping and the Impact Assessment processes required in Chapter 2.1, a concurrent reclamation, closure, and post-closure plan (or equivalent) is developed by competent professionals, as follows:<br>a. This plan is appropriate to the level of project development ;<br>b. It is developed at the earliest stage possible ;<br>c. It includes a general statement of purpose;<br>d. It includes a description of the post-closure land and facility use objectives that, to the greatest extent possible, align with affected communities' preferred post-closure land and facility uses ;<br>e. It includes site location and background site characterization information , as well as a description of the entire project/operation, including all associated facilities and individual facility features ; and<br>f. It outlines the role of affected rights-holders and stakeholders in the collaborative development, implementation, and monitoring and evaluation of this concurrent reclamation, closure, and post-closure plan; and | *The critical requirement for a reclamation and closure plan developed prior to the commencement of mine (former 2.6.2.1) has been combined with some content requirements from the former 2.6.2.2.*<br><br>*a. b. are from former 2.6.2.1 and associated guidance;*<br><br>*c. and d. align with former 2.6.2.2.a and e*<br><br>*e. was the former 2.6.2.2.b and c*<br><br>*f. was included in the former 2.6.2.2.d and p.* |
| 2.6.2.2 | | 2.6.2.2. At a minimum, the reclamation and closure plan shall contain:<br><br>a. A general statement of purpose;<br><br>b. Site location and background Information;<br><br>c. A description of the entire facility, including individual site features;<br><br>d. The role of affected communities in reviewing the reclamation and closure plan;<br><br>e. Agreed-upon post-mining land use and facility use;<br>. . .<br>p. The role of the community in long-term monitoring and maintenance (if any); and | | | | |
| | | 2.6.2.2. At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>i. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable;<br>. . . | 2.7.1.2 | | This plan ensures that all reclamation and closure measures and activities required in 2.7.1.3, 2.7.1.4, and 2.7.1.5 are implemented in a concurrent manner. When some activities cannot practically be implemented in such a concurrent manner, a rationale is documented and integrated into the plan for when some activities cannot practically be implemented in such a concurrent manner. | *This expands on former 2.6.2.2.i* |

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| | | 2.6.2.2. At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>f. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure;<br><br>g. Source mitigation program to prevent the degradation of water resources;78<br>. . .<br>j. Earthwork:<br>i. Stabilization and final topography of the reclaimed mine lands;<br>ii. Stormwater runoff/run-on management;<br>. . . | 2.7.1.3 | | To address water management, this plan includes:<br>a. Source and pathway characterization including modeling of geochemistry and hydrology to identify the potential release of contaminants during closure;<br>b. Source mitigation measures, clear objectives and effectiveness indicators, to prevent the degradation of water resources; and<br>c. Stormwater runoff/run-on management measures, clear objectives, and effectiveness indicators. | *a. was former 2.6.2.2.f*<br><br>*b. was former 2.6.2.2.g*<br><br>*c. was former 2.6.2.2.j.ii* |
| | | 2.6.2.2. At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>j. Earthwork:<br>i. Stabilization and final topography of the reclaimed mine lands;<br>ii. Stormwater runoff/run-on management;<br>iii. Topsoil salvage to the maximum extent practicable; and<br>iv. Topsoil storage in a manner that preserves its capability to support plant regeneration;<br><br>k. Revegetation/Ecological Restoration:<br>i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use;<br>ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time;<br>iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed;<br>iv. Measures for control of noxious weeds; and<br>v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6); | 2.7.1.4 | | To address earthwork, revegetation, and ecological restoration, this plan includes:<br>a. Earthwork measures, clear objectives and effectiveness indicators to ensure a stable landscape, including permanent stabilization measures and final topography planned for the reclaimed areas;<br>b. Revegetation measures, clear objectives and effectiveness indicators to ensure adequate revegetation, including: 1) quantitative revegetation standards based on analogous sites; 2) topsoil salvage to the maximum extent practicable over the lifecycle of the project/operation, and topsoil storage in a manner that preserves its capability to support plant regeneration ; and<br>c. Ecological restoration measures, clear objectives and effectiveness indicators to protect and restore ecosystem processes , including: 1) plant material selection for the preferred post-closure land use, prioritizing native species as appropriate; 2) plans for control of noxious weeds and alien/non-native species; 3) a defined period, no longer than 10 years after the facility is no longer is used, when all planned revegetation tasks will be completed. | *a. was former 2.6.2.2.j.i*<br><br>*b. was 2.6.2.2.k.ii and j.iii and j.iv*<br><br>*c. was 2.6.2.2.k.i and k.iv and k.iii. Quantitive standards from k.ii have been replaced with clear objectives and effectiveness indicators. Former 2.6.6.2.k.v is assumed, and mentioned in an endnote for 2.7.1.4.* |

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| | | 2.6.2.2. At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>l. Hazardous materials disposal;<br><br>m. Facility demolition and disposal, if not used for other purposes;<br>. . . | 2.7.1.5 | | To address polluted lands, facilities and hazardous waste management this plan includes:<br>a. Polluted soil remediation measures, with clear objectives and effectiveness indicators ;<br>b. Hazardous material and hazardous waste disposal measures, with clear objectives and effectiveness indicators; and<br>c. Facility and equipment decommissioning measures that prioritize the reuse and recycling of materials, with clear objectives and effectiveness indicators. | *a. is new*<br><br>*b. was former 2.6.2.2.l*<br><br>*c. was former 2.6.2.2.m. It now includes the prioritization of recycling and reuse of materials, to align with requirements in Chapter 4.1 related to circular reuse of materials.* |
| 2.6.5.1 | | Monitoring of closed mine facilities for geotechnical stability and routine maintenance are required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all mine facilities including, but not limited to:<br><br>a. Inspection of surface (open pits) and/or underground mine workings;<br><br>b. Inspection and maintenance of mine waste facilities including effectiveness of any cover and/or seepage capture systems; and<br><br>c. Mechanisms for contingency and response planning and implementation. | 2.7.1.6 | | To address post-closure management of facilities (including TSFs) and terrestrial resources, this plan includes:<br>a. Measures, clear objectives and effectiveness indicators to ensure post-closure monitoring and maintenance of facilities (including TSFs), including: 1) Inspection of surface stability and/or underground mine workings subsidence; 2) Monitoring and maintenance of waste and tailings facilities including effectiveness of revegetation, stormwater controls, and any cover and/or seepage capture systems;<br>b. For facilities where long-term risks have not been eliminated (including water treatment, TSFs and other high-risk facilities), mechanisms for contingency and response planning and implementation; and<br>c. Measures, clear objectives, and effectiveness indicators to ensure post-closure monitoring of terrestrial resources, if necessary . | *a. aligns with former 2.6.5.1.a and b and 2.6.2.2.n and o.*<br><br>*b. was former 2.6.5.1.c*<br><br>*c. was 2.6.2.2.o and 2.6.5.4* |
| 2.6.2.2 | | At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>n. Long-term maintenance;<br><br>o. Post-closure monitoring plan;<br>. . . | | | | |
| 2.6.5.4 | | Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources. | | | | |
| 2.6.2.2 | | At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>g. Source mitigation program to prevent the degradation of water resources; | 2.7.1.7 | | To address post-closure water management, and informed by Sections 4.3.3 and 4.3.4, this plan includes:<br>a. Measures, clear objectives and effectiveness indicators to ensure post-closure operation, inspection and maintenance of water impact mitigation measures, including; 1) Source controls and/or capture and treatment needed to prevent degradation of ground water and surface water, including measures related to pit lake and/or underground mine water quality; 2) Post-closure water capture and treatment using treatment technology proven to be effective for similar water chemistry and under similar conditions and at a similar scale to the water that will need to be treated;<br>b. Post-closure monitoring of surface waters, groundwaters, and biota, including an appropriate number of sampling and monitoring sites to detect pollution from closed facilities and detect changes in water quality or ecosystem health at compliance and off-site locations; and<br>c. The plan includes post-closure water monitoring for at least 25 years beyond the time when active | *a. clarifies expectations for post-closure, building on the former 2.6.2.2.g and 2.6.5.5.*<br><br>*b. clarifies expectations for post-closure, building on the former 2.6.5.2 and 2.6.5.4*<br><br>*c. was former 2.6.5.3 (language clarified)* |
| 2.6.5.5. | | If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds or agricultural uses adequate measures shall be taken to protect these organisms | | | | |

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| 2.6.5.2 | | Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance. | | | mitigation ceases. Besides this minimum period, the plan includes any additional time necessary for predicted water quality to be in conformance with IRMA Water Quality Criteria for at least five consecutive years. | |
| 2.6.5.4 | | Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources. | | | | |
| 2.6.5.3 | | Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least five years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively. | | | | |
| | | | 2.7.1.8 | | To ensure adequate and safety reclamation of exploration work, this plan includes measures, clear objectives and effectiveness indicators to ensure that open surface features such as trenches and pits used for drilling mud, bulk sampling or geotechnical sampling are completely backfilled and regraded to original contours, or to contours that are compatible with the post-closure land use objectives (see 2.7.1.4). | *This is new, but only applicable to exploration projects, and was proposed in the 2021 IRMA-Ready draft standard* |
| 2.6.3.1 | | Open pits shall be partially or completely backfilled if:<br><br>a. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2;<br><br>b. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and<br><br>c. It is economically viable. | 2.7.1.9 | | To address post-closure safety of open pits, this plan includes measures, clear objectives and effectiveness indicators to ensure that open pits will be partially or completely backfilled :<br>a. If, and whenever, a pit lake is predicted to exceed the water quality criteria required in IRMA Chapter 4.2 ;<br>b. If the Entity and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and<br>c. If it is economically viable. | *Requirement restructured to increase clarity and auditability. No substantial change* |
| 2.6.3.2 | | Underground mines shall be backfilled if:<br><br>a. Subsidence is predicted on lands not owned by the mining company; and<br><br>b. If the mining method allows. | 2.7.1.10 | | To address post-closure safety of underground mines, this plan includes measures, clear objectives and effectiveness indicators to ensure that underground mines will be backfilled if the predicted risk of subsidence will be material and if alternative effective mitigation to address the impact of subsidence are not available/viable. | *Requirement restructured to increase clarity and auditability.* |

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| 2.6.2.2 | | At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>q. A schedule for all activities indicated in the plan. | 2.7.1.11 | | This plan includes a detailed schedule for all measures and activities indicated in the plan, including concurrent reclamation and closure activities, as follows:<br>a. The schedule includes when the various reclamation and closure activities will begin, occur, and end, for each facility and for the site overall;<br>b. It includes time critical items and milestones for each facility and for the site overall; and<br>c. It includes any anticipated periods of temporary closure during which the interim fluid and site management plan (see 2.7.1.12) will be implemented;<br>d. It includes provisions for notifying regulators of unplanned or extended temporary closures. | *This was former 2.6.2.2.q. It incorporates material previously in guidance.* |
| 2.6.2.2 | | At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>h. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization; | 2.7.1.12 | | To address situations where operations at a mine/mineral processing site are suspended or unexpectedly ceased, an interim fluid and site management plan (or equivalent) is developed by competent professionals, as follows:<br>a. This plan includes information on how process-water management systems, interceptor wells, seepage-collection systems and stormwater management systems would be operated and maintained to prevent releases and continue to meet environmental compliance obligations;<br>b. It includes measures, clear objectives and effectiveness indicators to: 1) stabilize excavations and workings; 2) isolate or control toxic or hazardous materials; 3) store or remove equipment, supplies and structures; 4) maintain the site in a secure, safe and clean condition; and<br>c. It includes provisions to monitor fluid and site conditions during periods of non-operation. | *This was former 2.6.2.2.h. It incorporates material previously in guidance.* |
| | | | ***2.7.2*** | | ***Estimated Costs*** | *This section was previously integrated in the "Reclamation and Closure Planning" Section. This has now been separated for greater clarity and readability.* |

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| 2.6.2.3 | | The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum:<br><br>a. Mobilization/demobilization;<br><br>b. Engineering redesign, procurement, and construction management;<br><br>c. Earthwork;<br><br>d. Revegetation/Ecological Restoration;<br><br>e. Disposal of hazardous materials;<br><br>f. Facility demolition and disposal;<br><br>g. Holding costs that would be incurred by a regulatory agency if the operating company were to declare bankruptcy. These costs shall be calculated based on the assumption that there would be a two-year period before final reclamation activities would begin, and shall include costs related to:<br>i. Interim process water and site management; and<br>ii. Short-term water treatment;<br><br>h. Post-closure costs for:<br>i. Long-term water treatment; and<br>ii. Long-term monitoring and maintenance;<br><br>i. Indirect Costs:<br>i. Mobilization/demobilization;<br>ii. Engineering redesign, procurement and construction management;<br>iii. Contractor overhead and profit;<br>iv. Agency administration; and<br>v. Contingency; and<br><br>j. Either:<br>i. A multi-year inflation increase in the financial surety; or<br>ii. An annual review and update of the financial surety. | 2.7.2.1 | | The concurrent reclamation, closure, and post-closure plan includes a detailed determination of the estimated costs of reclamation and closure, and post-closure measures and activities, as follows:<br>a. These estimated costs are based on the conservative assumption that they would be carried out by a regulatory agency using a third-party contractor ;<br>b. They include costs associated with water management (as per 2.7.1.3);<br>c. They include costs associated with earthwork, revegetation, and ecological restoration (as per 2.7.1.4);<br>d. They include costs associated with polluted lands, facilities (including TSFs) and hazardous waste management (as per 2.7.1.5);<br>e. They include holding costs for interim fluid and site management (as per 2.7.1.12) that would be incurred by a regulatory agency if the ENTITY were to declare bankruptcy ;<br>f. They include post-closure costs for: 1) post-closure management of facilities (including TSFs ) and terrestrial resources (as per 2.7.1.6); and 2) post-closure water management (as per 2.7.1.7); and<br>g. They include other direct and indirect costs, covering: 1) Mobilization/demobilization; 2) Engineering redesign, procurement and construction management; 3) Contractor overhead and profit; 4) Agency administration; 5) Insurance and performance bond; and 6) Contingency. | *Have added clarity by referenccing previous requirements.*<br><br>*b. is new.*<br>*c. was former 2.6.2.3.c and d*<br>*d. was former 2.6.2.3.d and e and f*<br>*e. was former 2.6.2.3.g.*<br>*f. was former 2.6.2.3.h*<br>*g. was former 2.6.2.3.a, b and i. Added that "insurance and performance bond" also needs to be included, as it is being included as a separate calculation category in some reclamation cost programs (e.g., Nevada's Standard Reclamation Cost Estimator, which is one of the most widely used estimator programs today). It could have been captured by Agency Administration, but this makes it more clear.* |
| | | | 2.7.2.3 | | The estimated costs required in 2.7.2.1:<br>a. Take into account inflation, and include a multi-year cost inflation that corresponds to the number of years: 1) until the concurrent reclamation, closure, and post-closure plan and costs are next scheduled to be reviewed (see 2.6.1.6) ; and 2) necessary to complete post-closure measures and activities (2.7.3.3);<br>b. Are calculated by competent professionals using a credible method ; and<br>c. Are reviewed by a competent third-party, or by a competent authority | *a. was former 2.6.2.3.j*<br><br>*b. and c. are new.* |

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| ***2.6.4*** | | ***Financial Surety for Mine Closure*** | ***2.7.3*** | | ***Financial Assurance*** | *Modified so that it is not implied that that Financial Assurance is only expected for mine closure, but rather for reclamation, closure, and post-closure (former criteria 2.6.4 and 2.6.7 and now merged)* |
| 2.6.4.1 | Critical | Financial surety instruments shall be in place for mine closure and post-closure (see also 2.6.7). | 2.7.3.1 | Critical | If the country of operation offers financial assurance instrument/s managed by the State for reclamation, closure and post-closure, in the form of cash deposit or trust fund (or equivalent):<br>a. The ENTITY adopts and implements it/them, from the earliest stage possible , and throughout the project/operation life cycle;<br>b. The ENTITY ensures this financial assurance is sufficient to cover the costs of interim fluid and site management, all concurrent reclamation, all closure, and all post-closure measures and activities, as estimated in the most current reclamation, closure, and post-closure plan in accordance with Section 2.7.2 ;<br>c. The ENTITY ensures this financial assurance is independently guaranteed and reliable; and<br>d. The ENTITY ensures this financial assurance is readily liquid and accessible to the competent authority , excluding all forms of self-bonding or corporate guarantees.<br><br>**OR**<br><br>If the country of operation does not offer any financial assurance instrument managed by the State for reclamation, closure and post-closure, in the form of cash deposit or trust fund (or equivalent):<br>a. The ENTITY has some form of financial assurance in place, from the earliest stage possible , and throughout the project/operation life cycle;<br>b. This financial assurance is sufficient to cover the costs of interim fluid and site management, all concurrent reclamation, all closure, and all post-closure measures and activities, as estimated in the most current reclamation, closure, and post-closure plan in accordance with Section 2.7.2 ;<br>c. This financial assurance is independently guaranteed and reliable; and<br>d. If self-bonding or corporate guarantees are used, the ENTITY makes publicly accessible detailed information on the likelihood that funds would be available to the competent authority to cover the cost of reclamation, closure and/or post-closure: 1) at the end of the operation's life; 2) if operations are suspended or unexpectedly ceased; and 3) if the ENTITY were to go bankrupt prior to the planned closure date. | *The need for an adequate financial assurance remains critical. The first years of independent audits against IRMA, and comments received on the 2023 draft version, have confirmed that a few countries still do not offer financial assurance instrument/s for mining and/or industrial reclamation, closure and post-closure, in the form of cash deposit or trust fund (or equivalent), that is hosted and overseen by the State. This has led to a situation where auditors have not been able to consistently audit and score this requirement in the 2018 Standard V1.0. In the interim, IRMA published specific guidance for companies and audit firms (November 2022, then updated in May 2023; available at: https://responsiblemining.net/wp-content/uploads/2023/05/Assurance-Committee-Memo-of-Decision-re-Financial-Surety-Reporting-20230523.pdf)*<br><br>*IRMA has now separated the two situations (i.e. whether there is a State-hosted instrument or not) and kept the requirement for "no self-bonding or corporate guarantee" only in the first situation. IRMA will be continuously monitoring evolution in this space, as more countries close this gap (e.g. like Brazil more recently) and alternative independent regional or global funds or reliable financial assurance instruments get developed.* |
| 2.6.4.2 | | Financial surety instruments for shall be:<br>a. Independently guaranteed, reliable, and readily liquid;<br>b. Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan;<br>c. In place before ground disturbance begins; and<br>d. Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. | | | | |
| 2.6.4.3 | | Self-bonding or corporate guarantees shall not be used. | | | | |
| 2.6.7.1 | | The operating company shall provide sufficient financial surety for all long-term activities, including post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be available, irrespective of the operating company's finances at the time of mine closure or bankruptcy. | | | | |

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| 2.6.7.4 | | Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including:<br>a. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and<br>b. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US $10.00 or less (or its equivalent in other currencies). | 2.7.3.2 | | The terms of the financial assurance ensure that:<br>a. For sites where long-term risks have not been eliminated (including risk related to long-term water treatment, TSFs and other high-risk facilities), calculations of financial assurance use of 500-year duration for long-term post-closure costs;<br>b. For all sites, the financial assurance instrument/s are not released until all the following have been shown to be effective and stable: 1) final water management (as per 2.7.1.3); final earthwork, revegetation, and ecological restoration (as per 2.7.1.4); and final polluted lands, facilities (including tailings storage facilities) and hazardous waste management (as per 2.7.1.5); and<br>c. For all sites, the financial assurance instrument/s are not released until public comment has been received and taken into account before partial or final release, in accordance with 2.7.4.2. | *a. has been adapted from former 2.6.7.4 which was proven to be difficult to understand and audit. IRMA moves from an interest-based NPV approach to a year-based approach. It also incorporates former 2.6.7.2 related to long-term water treatment.*<br><br>*b. was former 2.6.4.6.a*<br><br>*c. was former 2.6.4.6.b* |
| 2.6.4.6 | | The terms of the financial surety shall guarantee that the surety is not released until:<br><br>a. Revegetation/ecological restoration and reclamation of mining and waste sites and have been shown to be effective and stable; and<br><br>b. Public comment has been taken before partial or final surety release. | | | | |
| 2.6.7.2 | | If long-term water treatment is required post-closure:<br><br>a. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and<br><br>b. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded. | | | | |

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| | | | 2.7.3.3 | *IRMA+* | *If the country of operation does not offer any financial assurance instrument managed by the State for reclamation, closure and post-closure, in the form of cash deposit or trust fund (or equivalent), the ENTITY has financial assurance in place, from the earliest stage possible , and throughout the project/operation life cycle, as required in 2.7.3.1* but in a form that is readily liquid and accessible to the competent authority, excluding all forms of self-bonding or corporate guarantees.* | *This is a new **OPTIONAL** requirement, when there is no reliable State-hosted instrument, but the Entity anyway adopts and implements an alternative financial instrument that guarantee financial assurance is readily liquid and accessible to the competent authority, excluding all forms of self-bonding or corporate guarantees. This goes above and beyond established best practice so far.* |
| | | | ***2.7.4*** | | ***Meaningful Engagement with Stakeholders*** | *Stakeholder-engagement-related requirements and subrequirements now moved to a dedicated Section.* |
| 2.6.2.2 | | At a minimum, the reclamation and closure plan shall contain:<br>. . .<br>d. The role of affected communities in reviewing the reclamation and closure plan;<br>. . .<br>p. The role of the community in long-term monitoring and maintenance (if any); | 2.7.4.1 | | In accordance with Chapter 1.2, and as per 2.7.1.1, the Entity has a system in place to ensure that affected communities and relevant stakeholders are:<br>a. Preemptively provided with relevant and comprehensive information, in accordance with Section 1.2.3, about the development and implementation of the concurrent reclamation, closure, and post-closure plan, including the most recent version, and all previous versions of: 1) the plan; 2) the reviewed estimated costs; and 3) the results of the approved financial assurance review ;<br>b. Consulted and involved during the collaborative development and implementation of the concurrent reclamation, closure, and post-closure plan; and<br>c. Consulted and involved during the collaborative monitoring and evaluation of the concurrent reclamation measures and activities (in accordance with Section 2.7.5). | *This is new, to ensure that:*<br>*a. communities and stakeholders have enought information in a timely manner to meaningfully contribute (see below 2.7.4.2). This is in line with the rest of the Standard*<br><br>*b. This is new. It is the auditing of the implementation of the collaborative development and implementation step required in 2.7.1.1.c.*<br><br>*c. This is new. It is the auditing of the implementation of the collaborative monitoring and evaluation required in 2.7.1.1.c.*<br><br>*This is likely to not change the workload for either the Entity or the auditors as "the role of the community in" such activities was already required in the plan (and implicitly expected to be implemented).* |

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| 2.6.2.5 | | If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:<br><br>a. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and<br><br>b. Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety. | 2.7.4.2 | | In accordance with Chapter 1.2, the ENTITY has a system in place to ensure that affected rights-holders and stakeholders, and other relevant stakeholders:<br>a. Can comment on the initial version of, and any significant update of, the concurrent reclamation, closure, and post-closure plan, at least 60 days prior to the formal finalization process ;<br>b. If necessary, are provided with resources for capacity building and training to enable meaningful stakeholder engagement ; and<br>c. Are provided with the opportunity to propose independent experts to provide input to the Entity on the design and implementation of the plan, and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial assurance. | *a. was former 2.6.2.5*<br><br>*b. was former 2.6.2.5.a*<br><br>*c. was former 2.6.2.5.b* |
| 2.6.4.4 | | The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request. | | | | |
| 2.6.4.5 | | Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:<br><br>a. Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential reasons, the fact that the information has been withheld shall be disclosed along with the financial surety.<br><br>b. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and<br><br>c. Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested stakeholders | 2.7.4.3 | | In accordance with Chapter 1.2, the ENTITY has a system in place to ensure that affected rights-holders and stakeholders, and other relevant stakeholders:<br>a. Are preemptively provided with the results of all approved financial assurance reviews, and can comment on the adequacy of the proposed financial assurance instruments and/or arrangements, at least 60 days prior to the finalization and to any renewal of the financial assurance;<br>b. If necessary, are provided with resources for capacity building and training to enable meaningful stakeholder engagement ; and<br>c. Are provided with the opportunity to propose independent experts to review the financial assurance and provide input to the Entity on its adequacy. | *a. was former .6.4.4 (though has been strengthened) and 2.6.4.5*<br><br>*b. was former 2.6.4.5.b*<br><br>*c. was former 2.6.4.5.c* |

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| | | with the opportunity to propose independent experts to review the financial surety. | | | | |
| | | | ***2.7.5*** | | ***Monitoring and Evaluation*** | *New heading* |
| 2.6.2.4 | | The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years […] | 2.7.5.1 | | To monitor and evaluate the effectiveness and appropriateness of its concurrent reclamation, closure, and post-closure plan, the ENTITY, at least annually:<br>a. Tracks and documents its performance on water management, over successive time periods, against the objectives and effectiveness indicators defined in 2.7.1.3, and informed by stakeholder engagement as per Section 2.7.4;<br>b. Tracks and documents its performance on earthwork, revegetation, and ecological restoration, over successive time periods, against the objectives and effectiveness indicators defined in 2.7.1.4, and informed by stakeholder engagement as per Section 2.7.4; and<br>c. Tracks and documents its performance on polluted lands, facilities and hazardous waste management, over successive time periods, against the objectives and effectiveness indicators defined in 2.7.1.5, and informed by stakeholder engagement as per Section 2.7.4. | *Requirements in Section 2.7.5 build on existing Guidance and comparable requirements in other chapters to ensure that Monitoring and Evaluation dimensions are consistent throughout the Standard. No substantial change in workload expected; primarily clarification and greater auditability.*<br><br>*2.7.5.1.a, b and c are consistent with 2.6.2.4, but provide more specificity on the elements that need to be reviewed.* |

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| 2.6.2.2 | | d. The role of affected communities in reviewing the reclamation and closure plan; | 2.7.5.2 | | The monitoring and evaluation process:<br>a. Encourages and facilitates joint tracking or joint fact-finding with affected communities, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized or individuals from affected communities, as per Chapter 1.2 ;<br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected communities; and<br>c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of community members and stakeholders . | *2.7.5.2.a aligns with the former 2.6.2.2.d.*<br><br>*b. was partially covered by the former 2.6.7.3.*<br><br>*c. is new.* |
| 2.6.7.3 | | The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety. | | | | |
| | | | 2.7.5.3. | *IRMA+* | *To monitor and evaluate the effectiveness and appropriateness of the soil erosion reduction measures required as per 2.7.1.4.a, competent professionals, at least annually:*<br>*a. Conduct visual inspections of lands and facilities that may be subject to erosion;*<br>*b. Use credible methodologies to measure or estimate soil erosion rates; and*<br>*c. Use credible methodologies to measure or estimate soil loss.* | *New OPTIONAL requirement* |
| | | | ***2.7.6*** | | ***Continuous Improvement*** | *New heading* |
| 2.6.2.4 | | The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report. | 2.7.6.1 | | At least annually, but without undue delay after a significant change, the ENTITY:<br>a. Reviews the monitoring and evaluation results, and the ENTITY's effectiveness in meeting the objectives and indicators defined in 2.7.1.3, 2.7.1.4, and 2.7.1.5;<br>b. Reviews any concurrent reclamation-related or closure-related grievances filed through its grievance mechanism/s, and any relevant notification submitted through its whistleblowing mechanism (see Section 1.6.4);<br>c. Develops and implements time-bound corrective measures to update, if necessary , its concurrent reclamation, closure, and post-closure plan in accordance with Section 2.7.1;<br>d. Develops and implements time-bound corrective measures to update, if necessary , its estimated costs in accordance with Section 2.7.2; and<br>e. Develops and implements time-bound corrective measures to update, if necessary , its monitoring and evaluation processes in accordance with Section 2.7.5. | *Requirements in Section 2.7.6 build on existing Guidance and comparable requirements in other chapters to ensure that Continuous Improvement dimensions are consistent throughout the Standard. No substantial change in workload expected; only clarification and greater auditability.*<br><br>*a. draws on former 2.6.2.4.*<br><br>*b. aligns with former requirement 1.4.1.1 from Chapter 1.4-Complaints and Grievance Mechanism and Access to Remedy.*<br><br>*c and d are consistent with former 2.6.2.4.*<br><br>*e. is new, and aligns with* |
| 1.4.1.1. | | The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as "stakeholders") have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to | | | | |

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| | | the company and its mining-related activities. | | | | *Continuous Improvement requirements in other chapters.* |
| 2.6.7.3 | | The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety. | | | | |
| 2.6.7.3 | | The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety. | 2.7.6.2 | | At least every five years, but without undue delay after a significant change:<br>a. The ENTITY reviews all financial assurance instruments required in Section 2.7.3 (related to reclamation, closure, and post-closure); and<br>b. This review is done by competent third-party analysts, using credible accounting methods. | *This is aligned with former 2.6.7.3.* |
| | | | ***2.7.7*** | | ***Information-Sharing and Public Reporting*** | *All information-sharing and public reporting dimensions regrouped under a dedicated Section, to be consistent with the rest of the Standard* |
| 2.6.2.6 | Critical | The most recent version of the reclamation and closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request. | 2.7.7.1 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. The concurrent reclamation, closure, and post-closure plan;<br>b. A concurrent reclamation progress report, for the reporting period;<br>c. Information on the form and terms of financial assurance in place, and whether or not it is sufficient to cover the costs required to achieve all the time-critical items and milestones for each facility and for the site overall, in their current state, as outlined in the most recent concurrent reclamation, closure, and post-closure plan (see 2.7.1.11.b) ;<br>d. Key findings of the monitoring and evaluation process required in Section 2.7.5, and of the review process required in 2.7.6.1; and<br>e. A list of the time-bound corrective measures identified as per 2.7.6.1. | *a.was covered in former 2.6.2.6*<br><br>*b. was covered in former 2.6.2.4*<br><br>*c. was addressed in the former 2.6.4.4.*<br><br>*d. and e. are new (expanding on 2.6.2.4)*<br><br>*The disclosure expectations have now been expanded to public accessibility (rather than limited to stakeholders if requested).* |
| 2.6.2.4 | | The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report. | | | | |
| 2.6.4.4 | | The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request. | | | | |
| ***2.6.1*** | | ***Exploration Reclamation*** | | | - | *Section 2.6.1 heading Exploration Reclamation, and all of its requirements, have been deleted, and exploration has been integrated throughout the rest of the Chapter* |
| 2.6.1.1 | | The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the | | | - | |

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| | | mining development will be met by the company. | | | | |
| 2.6.1.2 | | The operating company shall implement exploration-related reclamation in a timely manner. | | | - | |
| 2.6.1.3 | | Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4). | | | - | |
| ***2.6.3*** | | ***Backfilling as a Part of Reclamation*** | | | - | *Section 2.6.3 heading has been deleted. Its requirements were fully integrated into the new Section 2.6.1* |
| ***2.6.6*** | | ***Post-Closure Water Treatment*** | | | - | *Removed from the chapter* |
| 2.6.6.1 | | Long-term water treatment shall not take place unless:<br><br>a. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and<br><br>b. The operating company funds an engineering and risk assessment that:<br>i. Is carried out by an independent third-party;<br>ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods;<br>iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms;<br>iv. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and<br>v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion.87 | | | - | *Moved to Chapter 4.3. See 4.3.4.1.* |
| 2.6.6.2 | | If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated. | | | - | *Moved to Chapter 4.3. See 4.3.4.2.* |

# PRINCIPLE 3: SOCIAL RESPONSIBILITY

## Chapter 3.1 Fair Labor and Terms of Work

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **3.1** | | **Fair Labor and Terms of Work** | **3.1** | | **Fair Labor and Terms of Work** | |
| ***3.1.2*** | | ***Workers' Organizations and Agreements*** | ***3.1.1*** | | ***Freedom of Association*** | |
| 3.1.2.1 | Critical | The operating company shall respect the rights of workers to freedom of association and collective bargaining. | 3.1.1.1 | | The ENTITY has a formal policy in place that commits to:<br>a. Respect the right of all workers to freedom of association;<br>b. Remain neutral in any legitimate unionizing or worker-organizing effort;<br>c. Not produce or distribute material that disparages legitimate trade unions; and<br>d. Not establish or support a "company union" (or equivalent) that has the effect of undermining legitimate worker representation. | *Separates out freedom of association from collective bargaining (both addressed in former 3.1.2.1) and draws content from former 3.1.2.5.* |
| 3.1.2.5 | | The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike. | | | | |
| 3.1.2.6 | | Upon employment, the operating company shall:<br><br>a. Inform workers of their rights under national labor and employment law;<br><br>b. Inform workers that they are free to join a workers' organization of their choosing without any negative consequences or retaliation from the operating company;<br><br>c. If relevant, inform workers of their rights under any applicable collective agreement; and<br><br>d. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative. | 3.1.1.2 | Critical | To effectively respect the right of all workers to freedom of association, the ENTITY:<br>a. Proactively informs all employees of their right to freedom of association under national labor and employment law (if relevant), including freedom to join (or refrain from joining) a workers' organization of their own choosing without any negative consequences or retaliation from the ENTITY;<br>b. Proactively informs all contractors of their right to freedom of association under national labor and employment law (if relevant), including freedom to join (or refrain from joining) a workers' organization of their own choosing without any negative consequences or retaliation from the ENTITY;<br>c. Provides workers' representatives with access to facilities needed to carry out their functions in the workplace, including provision of access to designated non-work areas during organizing efforts for the purposes of communicating with workers, and provision of accommodations for workers' representatives at sites, where relevant ; and<br>d. Where national law substantially restricts workers' organizations, the ENTITY allows workers to develop alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment, and does not attempt to influence or control these mechanisms. | *In 2018, respecting the rights to freedom of association and collective bargaining was a critical requirement (former 3.1.2.1). Here, 3.1.1.2 was made critical because it is the core requirement through which entities actually demonstrate commitment to respecting freedom of association.*<br><br>*a. expands on former 3.1.2.6.a and b.*<br><br>*b. makes explicit an obligation to inform contractors of this right; in the 2018 Standard, this was covered by a clause in Chapter 1.1 requiring contractor compliance with relevant IRMA requirements.*<br><br>*c. from former 3.1.2.4*<br><br>*d. is former 3.1.2.2* |
| 3.1.2.4 | | Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers' representatives at fly-in/fly-out or other remotely located mine sites, where relevant. | | | | |

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| 3.1.2.2 | | Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms. | | | | |
| | | | ***3.1.2*** | | ***Collective Bargaining*** | |
| 3.1.2.1 | Critical | The operating company shall respect the rights of workers to freedom of association and collective bargaining. | 3.1.2.1 | | The ENTITY has a formal policy in place that commits to:<br>a. Respect the right of all workers to collective bargaining;<br>b. Respect the terms and agreements of Collective Bargaining Agreements (CBA), and not use short-term contracts or other measures to undermine a CBA or avoid or reduce obligations to employees under applicable labor and social security laws and regulations ;<br>c. Not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith ; and<br>d. Not impose sanctions on employees, workers' representatives or workers' organizations participating in a legal strike . | *Separates out freedom of association from collective bargaining (both addressed in former 3.1.2.1).*<br><br>*a. combines former 3.1.2.8 and 3.1.2.9*<br><br>*b. adaptation of former 3.1.2.10*<br><br>*c. draws content from former 3.1.2.7* |
| 3.1.2.7 | | The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike. | | | | |
| 3.1.2.9 | | The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations. | | | | |
| 3.1.2.10 | | The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike. | | | | |
| 3.1.2.8 | | Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements. | 3.1.2.2 | Critical | To effectively respect the right of all workers to collective bargaining, the Entity:<br>a. During induction: 1) proactively informs all workers of their right to collective bargaining under national labor and employment law (if relevant), and of their rights under any applicable CBA (if relevant); and 2) provides all workers with a copy of any applicable CBA and the contact information for the appropriate trade union (or workers' organization) representative, if relevant ;<br>b. Negotiates in good faith with employees, workers' representatives and workers' organizations and provides them with information needed for meaningful negotiation in a timely manner ; and<br>c. Ensures that contracting firms also conform with 3.1.2.1, 3.1.1.2.a and 3.1.1.2.b, using controls, oversight, and/or contractual clauses as appropriate. | *In 2018, respecting collective bargaining was a critical requirement (former 3.1.2.1). Here, 3.1.2.2 was made critical because it is the core requirement through which entities actually demonstrate commitment to respect collective bargaining.*<br><br>*a. from former 3.1.2.6.a and c.*<br><br>*b. from former 3.1.2.3*<br><br>*c. makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance. Therefore no new expectations of entities.* |
| 3.1.2.6 | | Upon employment, the operating company shall:<br><br>a. Inform workers of their rights under national labor and employment law;<br><br>b. Inform workers that they are free to join a workers' organization of their choosing without any negative consequences or retaliation from the operating company;<br><br>c. If relevant, inform workers of their rights under any applicable collective agreement; and<br><br>d. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative. | | | | |

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| 3.1.2.3 | | The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner. | | | | |
| ***3.1.3*** | | ***Non-Discrimination and Equal Opportunity*** | ***3.1.3*** | | ***Non-Discrimination and Equal Opportunity*** | |
| 3.1.3.1 | | The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements. | 3.1.3.1 | | 3.1.3.1 The ENTITY has a formal non-discrimination and equal opportunity policy (or equivalent) in place that commits to:<br>a. Zero tolerance towards discrimination in the workplace;<br>b. Never base employment decisions on personal characteristics that are unrelated to inherent job requirements , nor on the need for a reasonable accommodation; and<br>c. Always base employment relationships on the principles of equal opportunity, fair treatment, equal pay for equal work , and non-discrimination. | *Draws on intent of former 3.1.3.1, but asks that this commitment be expressed in terms of a formal policy. Separates out non-discrimination / equal opportunity from harassment (now addressed in section 3.1.4),*<br><br>*Made critical due to importance of issue.* |
| | | | 3.1.3.2 | | The Entity ensures that:<br>a. The policy required in 3.1.3.1 is communicated to all workers and available to them on an ongoing basis, in appropriate local language(s) and formats ;<br>b. All workers, including managers and supervisors, are trained on the policy required in 3.1.3.1, as appropriate to their role ; and<br>c. Contracting firms also conform with 3.1.3.1, 3.1.3.2.a and 3.1.3.2.b, using controls, oversight, and/or contractual clauses as appropriate. | *New requirement related to implementation of the policy in 3.1.3.1.*<br><br>*Made critical because it is the core requirement through which entities actually demonstrate commitment to non-discrimination and equal opportunity in the workplace.* |
| | | | 3.1.3.3 | IRMA+ | *To promote an accessible working environment, the Entity :*<br>*a. Offers to provide reasonable accommodations for employees with disabilities in the workplace, if needed. Information on this is made available to all employees and is part of any induction training of new employees;*<br>*b. Systematically identify physical requirements for each role in job descriptions, and proactively reviews work duties to identify potential reasonable accommodations to maximize accessibility to employees with disabilities; and*<br>*c. Assesses, in collaboration with employees with disabilities, existing barriers of premises, websites, IT system, and emergency preparedness and response procedures, and implements an accessibility plan for gradual elimination of the current barriers.* | *New OPTIONAL requirement.* |
| | | | ***3.1.4*** | | ***Anti-Harassment*** | |

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| 3.1.3.3 | Critical | The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers. | 3.1.4.1 | | 3.1.4.1 The ENTITY has a formal anti-harassment policy (or equivalent) in place that commits to:<br>a. Zero tolerance towards all forms of bullying and harassment, intimidation, coercion, and workplace violence. This policy:<br>b. Applies to all employees, contractors, visitors, and business partners, regardless of their seniority levels;<br>c. Prohibits all forms of bullying and harassment based on sex, gender identity, and pregnancy, particularly towards female workers; and<br>d. Prohibits all forms of bullying and harassment based on other personal characteristics . | *Draws on intent of former 3.1.3.3, but asks that this commitment be expressed in terms of a formal policy. Adds details as to what types of behaviours specifically are prohibited.* |
| | | | 3.1.4.2 | Critical | The Entity ensures that:<br>a. The policy required in 3.1.4.1 is communicated to all workers and available to them on an ongoing basis, in appropriate local language(s) and formats ;<br>b. All workers, including managers and supervisors, are trained on the policy required in 3.1.4.1, as appropriate to their role ; and<br>c. Contracting firms also conform with 3.1.4.1, 3.1.4.2.a and 3.1.4.2.b, using controls, oversight, and/or contractual clauses as appropriate. | *New requirement related to implementation of the policy in 3.1.3.1.*<br><br>*Made critical because it is the core requirement through which entities actually demonstrate commitment to prevent and address harassment, abuse and mistreatment in the workplace.* |
| ***3.1.6*** | | ***Disciplinary Procedures*** | ***3.1.5*** | | ***Disciplinary Actions*** | |
| 3.1.1.1 | | The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law. | 3.1.5.1 | | The ENTITY:<br>a. Has a formal disciplinary policy in place that commits to not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion, or intimidation during disciplinary actions ;<br>b. Has disciplinary procedures in place that provide specifics pertaining to the disciplinary actions associated with each type of infraction; and<br>c. These procedures (b.) detail the process that will be followed in the event of a disciplinary action . | *Incorporates intent of former 3.1.1.1 by asking that the commitments in former 3.1.6.2 (content of which incorporated here) be captured in a formal policy. Also integrates former 3.1.6.3* |
| 3.1.6.2 | | The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation of workers during disciplinary actions. | | | | |
| 3.1.6.3 | | The operating company shall keep records of all disciplinary actions taken. | | | | |
| 3.1.6.1 | | The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers. | 3.1.5.2 | | The ENTITY ensures that:<br>a. The policy required in 3.1.5.1 is communicated to all workers and available to them on an ongoing basis, in appropriate local language(s) and formats ;<br>b. All managers and supervisors receive mandatory training on, and understand, the policy and procedures required in 3.1.5.1;<br>c. Records of all disciplinary actions taken are kept; and<br>d. Contracting firms also conform with 3.1.5.1 using controls, oversight, and/or contractual clauses as appropriate. | *a. builds on former 3.1.6.1 (availability of policy)*<br><br>*b. new sub-requirement related to implementation of the policy in 3.1.5.1.*<br><br>*c. makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1* |

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| | | | | | | *requiring contractor compliance. Therefore no new expectations of entities.* |
| ***3.1.7*** | | ***Child Labor*** | ***3.1.6*** | | ***Child Labor*** | |
| 3.1.1.1 | | The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law. | 3.1.6.1 | | The ENTITY has a formal policy in place that commits to:<br>a. Avoid and prevent child labor;<br>b. Not hire, or use through contracting, children under the age of 18 to do hazardous work , or any other work defined as a worst form of child labor by ILO Convention 182 (Worst Forms of Child Labor) and ILO Recommendation 190 (Worst Forms of Child Labor);<br>c. Not hire or use children under the age of 15, or under the minimum age outlined in national law, whichever is higher, to do any work (hazardous or otherwise); and<br>d. Expect from contractors and suppliers to adhere to this policy. | *Incorporates intent of former 3.1.1.1 by asking that the commitments in former 3.1.7.2 and 3.1.7.3 be captured in a formal policy.*<br><br>*b. from former 3.1.7.2 with added references to legal basis for expectation*<br><br>*c. from former 3.1.7.3*<br><br>*d. makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance. Therefore no new expectations of entities.* |
| 3.1.7.2 | Critical | Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances). | | | | |
| 3.1.7.3 | Critical | The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher. | | | | |
| 3.1.7.1 | | The operating company shall document the ages of all workers. | 3.1.6.2 | Critical | To effectively avoid and prevent child labor:<br>a. The ENTITY ensures that the policy required in 3.1.6.1 is proactively communicated to all workers, contracting firms, and suppliers, and is available to them on an ongoing basis, in appropriate local language(s) and formats ;<br>b. The ENTITY documents the ages of all workers hired or contracted to perform work at the site and associated facilities;<br>c. An assessment of the risk of child labor amongst contractors and suppliers is carried out and documented by competent professionals, and updated on a regular basis; and<br>d. The ENTITY has a system in place to ensure that, whenever the risk assessment required in c. indicates a high risk of child labor amongst contractors or suppliers in the site's chain of activities, an enhanced human rights due diligence process is conducted by competent professionals to determine if children below the minimum age (for hazardous or non-hazardous work) are being employed by contractors and/or suppliers. | *Incorporates components of former 3.1.7.1 and 3.1.7.6*<br><br>*a. new sub-requirement related to implementation of the policy in 3.1.6.1.*<br><br>*b. former 3.1.7.1*<br><br>*c. makes explicit the need for a risk assessment to be carried out; former 3.1.7.6 implied that these risks would be known.*<br><br>*d. Incorporates content of* |
| 3.1.7.6 | | **Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children** | | | | |

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| | | **below the minimum age for hazardous or non-hazardous work are being employed.** If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter. | | | | *former 3.1.7.6 which is to take measures to prevent and address child labor upon identification of a heightened risk; this requirement asks for a 'heightened' risk assessment if the screening (now explicitly required under 3.1.6.2) shows risks exist.*<br><br>*Made critical because it is the core requirement through which entities actually demonstrate commitment to avoid and prevent child labor.* |
| 3.1.7.4 | | When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself. | 3.1.6.3 | | If any cases of child labor amongst employees are identified through the documentation required in 3.1.6.2.b, the Entity:<br>a. Takes immediate measures to safely remove these children from their work;<br>b. Develops and implements remediation procedures to provide these children with support in their transition to legal work or schooling, taking into consideration their welfare of the child and the financial situation of their child's families; and<br>c. Designs and implements internal corrective actions to address presence of child labor within the Entity. | *Incorporates content of former 3.1.7.4 and 3.1.7.5, both of which address actions entities should take if child labour detected.*<br><br>*a. from former 3.1.7.5.a*<br>*b. from former 3.1.7.5.b*<br>*c. new sub-requirement reflecting the need to also demonstrate that actions are being taken to prevent further cases of child labor in alignment with the commitment in 3.1.6.1.* |
| 3.1.7.5 | | If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:<br><br>a. The child shall be removed immediately from his or her job; and<br><br>b. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family. | | | | |
| 3.1.7.6 | | Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. **If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.** | 3.1.6.4 | | If any cases of child labor amongst contractors are identified through the enhanced human rights due diligence required in 3.1.6.2.d, the Entity:<br>a. Takes immediate measures to safely remove these children from their work;<br>b. Develops and implements remediation procedures to provide these children with support in their transition to legal work or schooling, taking into consideration their welfare of the child and the financial situation of their child's families; and<br>c. Works with the contracting firm to design and implement corrective actions to address presence of child labor within the organization and ends the association with the contracting organization if the presence of child labor within the contracting firm is not addressed within a reasonable time frame. | *Incorporates intent of former 3.1.7.6, but expands on what constitutes "appropriate steps" to remedy instances of child labour, drawing on content of former 3.1.7.4 and 3.1.7.5, applied to contractors (as distinct from employees and suppliers, each of which has its own level / type of obligation on behalf of the entity). See response to Consultation Question 3.1-05.* |
| | | | 3.1.6.5 | | If any cases of child labor amongst suppliers are identified through the enhanced human rights due diligence required in 3.1.6.2.d, the Entity:<br>a. Reports the cases to the appropriate authorities;<br>b. Works with the supplier, to the extent possible, to safely remove these children from their work, and to design and implement corrective actions to address | *Incorporates intent of former 3.1.7.6, but expands on what constitutes "appropriate steps" to remedy instances of child labour, drawing on* |

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| 3.1.7.5 | | If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work:<br><br>a. The child shall be removed immediately from his or her job; and<br><br>b. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family. | | | presence of child labor within the organization; and<br>c. Ends the business relationship with the supplier if these efforts are not feasible or not successful. | *content of former 3.1.7.4 and 3.1.7.5, applied to suppliers (as distinct from employees and contractors, each of which has its own level / type of obligation on behalf of the entity). See response to Consultation Question 3.1-05.* |
| 3.1.7.4 | | When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself. | 3.1.6.6 | | When a child between 15 and 18 years is legally performing non-hazardous work on-site, the Entity ensures:<br>a. The risks and impacts on the child's physical or mental health are assessed by competent professionals, and measures to minimize the risks and actual impacts are developed and implemented;<br>b. The national labor authority or, if that is not possible, the Entity itself, conducts regular monitoring of the child's health, working conditions, and working hours; and<br>c. Any problematic situation involving the child is resolved immediately, including through work stoppage to ensure the child's safety, if necessary. | *Builds upon former 3.1.7.4, separating out the component obligations contained therein and adding details for clarity.*<br><br>*c. new sub-requirement, but aligns with intent expressed in previous 3.1.7.5.* |
| ***3.1.8*** | | ***Forced Labor*** | ***3.1.7*** | | ***Forced Labor and Trafficking of People*** | |
| 3.1.8.1 | Critical | The operating company shall not employ forced labor or participate in the trafficking of persons. | 3.1.7.1 | | 3.1.7.1 The ENTITY has a formal policy in place that commits to:<br>a. Avoid and prevent forced labor and the trafficking of people;<br>b. Not require from workers to pay fees or deposits associated with their recruitment or employment;<br>c. Not charge workers with fees for food, clothing, transportation, health checks, documentation, or supplies as part of their recruitment; and<br>d. Issue written contracts to workers, in appropriate local language(s) , for review prior to employment ;<br>e. Allow workers to terminate their employment without penalty if reasonable notice is given per the worker's contract;<br>f. Not retain or restrict access to official identity papers and personal documentation originals provided by employees as part of the employment process;<br>g. Not unreasonably restrict the movement of workers or their access to basic liberties; and<br>h. Contractors and suppliers are also expected to adhere to the policy . | *Significantly expands upon expectations for content of the policy against forced labour indicated in former 3.1.8.1 to provide same level of robustness and specificity as child labour.* |

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| 3.1.8.2 | | Where there is a high risk of forced or trafficked labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor it suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter. | 3.1.7.2 | Critical | To effectively avoid and prevent forced labor and the trafficking of people:<br>a. The Entity ensures that the policy required in 3.1.7.1 is proactively communicated to all workers, contracting firms, and suppliers, and is available to them on an ongoing basis, in appropriate local language(s) and formats ;<br>b. The Entity ensures that personnel directly involved in recruitment processes and human resources management are trained on the policy required in 3.1.7.1, as appropriate to their role ;<br>c. An assessment of the risk of forced labor and the trafficking of people amongst contractors and suppliers is carried out and documented by competent professionals, and updated on a regular basis; and<br>d. The Entity has a system in place to ensure that, whenever the risk assessment required in c. indicates a high risk of forced labor or trafficking of persons amongst contractors or suppliers in the site's chain of activities, an enhanced human rights due diligence process is conducted by competent professionals to determine if forced labor or trafficked people are being used/employed by contractors and/or suppliers. | *This requirement significantly expands upon expectations for content of the policy against forced labour indicated in former 3.1.8.1 to provide same level of robustness and specificity as child labour.*<br><br>*3.1.7.2.d incorporates intent of former 3.1.8.2 which is to take measures to assess / prevent and address cases of forced / trafficked labour upon identification of a heightened risk; this requirement asks for a 'heightened' risk assessment if the screening (now explicitly required under 3.1.7.3.c) shows risks exist.*<br><br>*Made critical because it is the core requirement through which entities actually demonstrate commitment to avoid and prevent forced labor.* |
| | | | 3.1.7.3 | | If any cases of forced labor or the trafficking of people amongst employees are identified, including through whistleblowing notifications and investigations, the Entity:<br>a. Takes immediate measures to safely remove these individuals from their work;<br>b. Provides or facilitates access to, as appropriate to the situation: shelter and accommodation, medical and health-care services and counseling, mental health and psychosocial support, legal assistance; financial assistance; and repatriation assistance or reintegration into the labor market; and<br>c. Designs and implements internal corrective actions to address presence of forced labor or the trafficking of people within the Entity. | *Incorporates intent of former 3.1.8.2, but expands significantly on what constitutes "appropriate steps" to remedy instances of forced / trafficked labour. Details added mirror the remedies proposed for child labour.*<br><br>*Former 3.1.8.2 only expliicitly applied to 'supply chain' but here the 'steps' to be taken if cases are identified is separated into employee* |

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| | | | 3.1.7.4 | | If any cases of forced labor or the trafficking of people amongst contractors are identified through the enhanced human rights due diligence required in 3.1.7.2.d, the Entity:<br>a. Takes immediate measures to safely remove these individuals from their work;<br>b. Provides or facilitates access to, as appropriate to the situation: shelter and accommodation, medical and health-care services and counseling, mental health and psychosocial support, legal assistance; financial assistance; and repatriation assistance or reintegration into the labor market; and<br>c. Works with the contracting firm to design and implement corrective actions to address presence of forced labor or trafficked persons within the organization and ends the association with the contracting organization if the presence of forced labor or trafficked persons within the contracting firm is not addressed within a reasonable time frame. | *cases, contractor cases, and supplier cases, recognizing that expections will vary.* |
| | | | 3.1.7.5 | | If any cases of forced labor or the trafficking of people amongst suppliers are identified through the enhanced human rights due diligence required in 3.1.7.2.d, the Entity:<br>a. Reports the cases to the appropriate authorities;<br>b. Works with the supplier, to the extent possible, to safely remove these individuals from their work, and to design and implement corrective actions to address presence of forced labor or trafficked persons within the organization; and<br>c. Ends the business relationship with the supplier if these efforts are not feasible or not successful. | |
| ***3.1.4*** | | ***Retrenchment*** | ***3.1.8*** | | ***Retrenchment*** | |
| 3.1.4.1 | | Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination, and be implemented to reduce the adverse impacts of retrenchment on workers. | 3.1.8.1 | | The Entity has a system in place to ensure that, prior to implementing any collective dismissals/staff retrenchment:<br>a. An analysis of alternatives to retrenchment is carried out and documented by competent professionals;<br>b. This analysis (a.) is informed by consultations with: 1) Employees and their organizations; 2) Contracting firms, and contractors and their representatives, where contractors are affected; and 3) Where appropriate, representatives of affected communities and/or the government;<br>c. If the analysis required in b. does not identify viable alternatives to retrenchment, a retrenchment plan (or equivalent) is developed and documented by competent professionals. | *Adaptation of former 3.1.4.1, separating out the various stakeholders to be consulted for clarity.* |
| | | | 3.1.8.2 | | The Entity has a system in place to ensure that, retrenchment plans (developed as per 3.1.8.1.c):<br>a. Include measures to reduce the adverse impacts of retrenchment on workers;<br>b. Outline a clear timeline and budget for each stage of retrenchment;<br>c. Incorporate the principle of non-discrimination by developing objective, fair, and transparent criteria by which workers will be chosen for retrenchment;<br>d. Are implemented in a manner that ensures that all employees subject to retrenchment receive notice of dismissal and severance payments mandated by law and CBA (where applicable);<br>e. They also receive outstanding back pay, social security benefits, and pension contributions and benefits upon or before termination of the working relationship, or | *Builds on intent of former 3.1.4.1 and adapt former 3.1.4.2*<br><br>*b. new sub-requirement, consistent with expectations for management plans in other Chapters.*<br><br>*f. makes explicit entity obligations vis-à-vis* |

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| 3.1.4.2 | | The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments. | | | in accordance with a timeline agreed through a collective bargaining agreement, and receive payments directly, or through an appropriate institution that provides certain benefits to workers . Where payments are made to such institutions for the benefit of workers, the workers are provided with evidence of such payments; and<br>f. Where contractors are affected, the ENTITY ensures that contracting firms also conform with 3.1.8.2.d and 3.1.8.2.e, using controls, oversight, and/or contractual clauses as appropriate | *contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance. Therefore no new expectations of entities.* |
| ***3.1.5*** | | ***Grievance Mechanism*** | ***3.1.9*** | | ***Worker Grievance and Whistleblowing Mechanisms*** | |
| 3.1.5.1 | Critical | The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:<br><br>a. Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution;<br><br>b. Shall allow for anonymous complaints to be raised and addressed;<br><br>c. Shall allow workers' representatives to be present, if requested by the aggrieved worker; and<br><br>d. Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements. | 3.1.9.1 | | The ENTITY:<br>a. Has an operational-level employee grievance mechanism in place that allows all employees, and their organizations where they exist, to raise, and seek resolution or remedy for, complaints and grievances (hereafter referred to collectively as "grievances") related to the workplace, working conditions, and/or the ENTITY's activities;<br>b. This grievance mechanism provides for the involvement of an appropriate level of management in the oversight of grievances;<br>c. It clearly defines how grievances and communications with employees filing grievances are recorded, acknowledged, investigated, monitored, and equitably resolved or remedied, including with indicative timeframes for each stage of the procedure;<br>d. It clearly defines differentiated gender-sensitive procedures specifically designed to provide timely, appropriate, and effective remedies for female and nonbinary complainants, particularly where they are survivors of discrimination and/or sexual- and gender-based violence; and<br>e. It 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 . | *a. b. and c. are former 3.1.5.1.a. Clarified that this applies to employees (not contractors, which are addressed in the new 3.1.9.6).*<br><br>*d. new sub-requirement*<br><br>*e. new sub-requirement. See response to Consultation Question 3.1-03.* |

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| | | | 3.1.9.2 | Critical | This employee grievance mechanism:<br>a. Clearly defines how complainants can file grievances anonymously, and/or confidentially;<br>b. 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;<br>c. 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;<br>d. Ensures that complainants are not the subject of retaliation or retribution ;<br>e. Ensures that complainants can use the mechanism without prejudice to applicable employment and social rights as well as to any applicable collective agreements; and<br>f. Ensures that workers' representatives can be present at any proceedings or discussions relating to a grievance, if requested by the aggrieved employee. | *a. former 3.1.5.1.b*<br><br>*b. incorporates intent of former 3.1.5.1.d but asks that this be explicitly communicated*<br><br>*c. new sub-requirement, to provide more clarity to workers on where alternative remedies may be sought (as per the former 3.1.5.1.d).*<br><br>*d. and e. are new sub-requirements; however a. is based on an existing expectations under Chapter 1.6.1.3 (Grievance mechanism)*<br><br>*f. from former 3.1.5.1.c*<br><br>*Made critical because it lays out the core requirements through which entities actually demonstrate commitment to an effective handling of worker grievances.* |
| 3.1.5.2 | | The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. | 3.1.9.3 | | The ENTITY:<br>a. Proactively informs all employees of the existence and functioning of the employee grievance mechanism at the time of recruitment/hiring and/or induction;<br>b. Ensures grievance procedures are easily accessible to them on an ongoing basis, in appropriate local language(s) and formats ;<br>c. Ensures that, periodically, employees are provided with clearly-communicated opportunities to provide input on how to make the employee grievance mechanism more trusted and accessible; and<br>d. Ensures that, at least quarterly, employees receive feedback on how their input was considered. | *a. and b. from former 3.1.5.2*<br><br>*c. and d. new sub-requirements, aligned with stakeholder grievance mechanism expectations* |

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| 3.1.5.3 | | The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues. | 3.1.9.4 | | The ENTITY:<br>a. Ensures that relevant personnel directly involved in the implementation and management of the operational-level employee grievance mechanism are trained on, and understand, the proper procedures for handling grievances or concerns expressed through the employee grievance mechanism, including that there will be no retaliation against any individual or group utilizing this mechanism;<br>b. Has a clear procedure to identify potential conflicts of interest in grievance management and how these conflicts will be addressed; and<br>c. Maintains a record of all concerns submitted through the employee grievance mechanism , communications with involved parties, final resolutions, and the ENTITY's actions taken to respond to and/or resolve the issue | *a. and b. new sub-requirements, aligned with stakeholder grievance mechanism expectations*<br><br>*c. adaptation of former 3.1.5.3* |
| | | | 3.1.9.5 | | The Entity ensures that:<br>a. Contracting firms also conform with 3.1.9.1, 3.1.9.2, and 3.1.9.3 using controls, oversight, and/or contractual clauses as appropriate or, if contracting firms are unable to, it establishes a means to receive grievances directly from contractors;<br>b. Contracting firms also conform with 3.1.9.4 using controls, oversight, and/or contractual clauses as appropriate or, if the Entity has established a means to receive grievances directly from contractors, it informs contractors and keeps records of their grievances in accordance with 3.1.9.4; and<br>c. Contracting firms also conform with 3.1.9.5 using controls, oversight, and/or contractual clauses as appropriate or, if the Entity has established a means to receive grievances directly from contractors, it has a system in place to train personnel on the handling of grievances from contractors and to collect feedback from contractors in accordance with 3.1.9.5. | *New requirement, makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance. Therefore no new expectations of entities.* |
| | | | 3.1.9.6 | | The Entity:<br>a. Proactively informs all workers of the whistleblowing mechanism required in 1.6.2;<br>b. Ensures whistleblowing procedures are easily accessible to all workers on an ongoing basis, in appropriate local language(s) and formats ; and<br>c. Has a system in place to ensure that, periodically, all workers are provided with clearly-communicated opportunities to provide input on how to make the whistleblowing mechanism required in 1.6.2 more trusted and accessible, and they receive feedback on how their input was considered. | *New requirement, to provide more explicit link and clarify expectations regarding the whistleblower mechanism in Chapter 1.6. Requirements are aligned with stakeholder grievance mechanism expectations and employee grievance mechanism above.* |
| ***3.1.9*** | | ***Wages*** | ***3.1.10*** | | ***Wages, Benefits, and Other Compensation*** | |

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| 3.1.9.1 | | The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage. | 3.1.10.1 | | The Entity can demonstrate that wages are paid to employees as follows:<br>a. When employees are covered by a negotiated collective bargaining agreement (CBA), wages are paid according to the terms of the agreement. If any employees are not covered by a CBA, then living wage applicable to the context of the site and of those employees is determined and/or calculated by competent professionals using a credible methodology , and wages paid to those employees who are not covered by a CBA meet or exceed the higher of applicable legal minimum wage(s) or the living wage;<br>b. All overtime hours worked by employees are paid at a rate defined in a CBA, where relevant, or the higher of the either the overtime rate outlined in national law or a rate that is at least 125% of the regular hourly wage; and<br>c. The Entity ensures that contracting firms conform with the sub-requirements a and b above through controls, oversight, and/or contractual clauses as appropriate. | *a. and b. adaptation of former 3.1.9.1*<br><br>*b. expands upon former 3.1.9.2, drawing on ILO's minimum recommend threshold for overtime pay at 125% of regular pay.*<br><br>*c. New subrequirement which makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance. Therefore no new expectations of entities.*<br><br>*Made critical because it is the core requirement through which entities actually demonstrate commitment to paying fair wages.* |
| 3.1.9.2 | | Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage. | | | | |
| 3.1.9.4 | | The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check). | 3.1.10.2 | | The Entity ensures that:<br>a. All employees are provided with written and understandable information, in appropriate local language(s) and formats , about wages (overtime rates, deductions and bonuses) and benefits before they enter employment, and for the pay period each time they are paid;<br>b. Wages are paid in a manner that is reasonable for employees and individual contractors, at least monthly, and without unreasonable delay;<br>c. Deductions from wages are not made for disciplinary purposes unless: 1) permitted by a law of the country of operation that guarantees the procedural fairness of the disciplinary action and/or 2) permitted in a freely negotiated CBA or arbitration award; and<br>d. Wages, benefits, and deductions of employees and individual contractors are recorded and documented . | *a. adaptation of former 3.1.9.3*<br><br>*b. builds on former 3.1.9.4, specifying application to employees / individual contractors, as those are for whom the entity is directly responsible for wage payment*<br><br>*c. former 3.1.9.5*<br><br>*d. was formerly implicit in 3.1.9.3 (which askes that workers be provided with written wage information, which presumes documentation of said information) so not a new expectation. Separated out for clarity.* |
| 3.1.9.5 | | The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist:<br><br>a. Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or<br><br>b. Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award. | | | | |
| 3.1.9.3 | | All workers shall be provided with written and understandable information about wages (overtime rates, benefits, deductions and bonuses) before they enter employment, and for the pay period each time they are paid. | | | | |

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| 3.1.10.2 | | Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:<br><br>a. An annual paid holiday of at least three working weeks per year, after achieving one year of service; and<br><br>b. A maternity leave period of no less than 14 weeks. | 3.1.10.3 | | If not provided for in a CBA, the Entity provides all employees the following benefits, at a minimum:<br>a. An annual paid holiday of at least three working weeks per year, after achieving one year of service;<br>b. A paid gender-neutral parental leave period of no less than 18 weeks for the primary caregiver, and no less than one week for secondary caregiver, at full pay, as well as paid bereavement leave for death of immediate family members of at least two days; and<br>c. Paid personal medical leave with a sufficient wage replacement rate to prevent poverty and ensure essential needs can be met during leave-taking. | *Expands upon former 3.1.10.2, specifying application to employees as those are for whom the entity is directly responsible for paid leave and benefits*<br><br>*a. former 3.1.10.2.a*<br><br>*b. expands upon expectations in former 3.1.10.2.b*<br><br>*c. new sub-requirement. See response to Consultation Question 3.1-07.* |
| 3.2.4.4 | | The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows:<br><br>a. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement:<br><br>i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period;<br>ii. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary they would otherwise normally receive if healthy and working); or<br>iii. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker's employment at the mining project.<br><br>b. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and<br><br>c. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation | 3.1.10.4 | | In countries where workers' compensation is not provided through government schemes or a CBA or health insurance or other relevant compensation schemes covering occupational health matters, employees are provided with compensation for work-related injuries and illnesses as follows:<br>a. The ENTITY compensates employees for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period;<br>b. The ENTITY covers the cost of employee rehabilitation and any reasonable accommodations, if relevant, to facilitate an expeditious return to work;<br>c. If an employee is not able to return to work due to the severity of a work-related injury or illness , the ENTITY compensates for lost earnings until the employee qualifies for an adequate pension ;<br>d. If a work-related illness manifests after an employee has retired, the ENTITY, at minimum, compensates the employee for the related medical expenses;<br>e. Where an employee dies as a result of a work-related injury or illness, the ENTITY: 1) Covers the cost of funeral expenses and transportation of the employee's body; 2) Provides compensation to the family of the deceased employee that is equal to or greater than three months of the employee's salary; and 3) Offers to pay for counseling or other forms of psychological support for family members. | *Builds on former 3.2.4.4 (chapter on occupational health and safety). Specifies applicability in this requirement to employees of the entity.*<br><br>*a. from former 3.2.4.4.a.i*<br><br>*b. from former 3.2.4.4.b*<br><br>*c. from former 3.2.4.4.a.ii*<br><br>*d. from former 3.2.4.4.a.iii*<br><br>*e. builds on former 3.2.4.4 (chapter on occupational health and safety). Specifies applicability in this requirement to employees of the entity. 1) and 2). from former 3.2.4.4.c; and 3) new dimension: See response to Consultation Question 3.2-09 in Chapter 3.2.* |

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| | | that is equal to or greater than three months' salary of the deceased worker. | | | | |
| | | | 3.1.10.5 | | The Entity ensures that contracting firms conform with the following requirements through controls, oversight, and/or contractual clauses as appropriate:<br>a. 3.1.10.2 (wages);<br>b. 3.1.10.5 (benefits); and<br>c. 3.1.10.6 (compensation for work-related injuries and illnesses). | *Requirement which makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance. Therefore no new expectations of entities. Also, see response to Consultation Question 3.1-09.* |

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| | | | 3.1.10.6 | | If the ENTITY provides housing arrangements for workers that are not free, it has systems in place to ensure they meet the following requirements:<br>a. Rental arrangements, including any fees for accommodations or services, are discussed during recruitment and are clearly specified in employment contracts (or contractual clauses with contractors);<br>b. Rental arrangements, including any fees for accommodations or services never lead to a worker becoming indebted to the employer<br>c. Rental rates do not exceed local norms/market conditions;<br>d. Employees are not required to sign up for rental of accommodations that exceed their period of employment (or the period of contract applicable to the contractors' employees);<br>e. Workers are provided with a reasonable period of time to vacate the premises when their contract of employment is terminated; and<br>f. There are no fees or penalties for leaving accommodations early. | *New requirement* |
| | | | 3.1.10.7 | IRMA+ | The Entity ensures that contracting firms conform with requirement 3.1.10.4 related to paid holiday, parental leave, bereavement leave, and medical leave, through controls, oversight, and/or contractual clauses as appropriate. | *New OPTIONAL requirement. See response to Consultation Question 3.1-06.* |
| ***3.1.10*** | | ***Working Hours and Leave*** | ***3.1.11.1*** | | ***Working Hours*** | |
| 3.1.10.1 | | The operating company shall ensure that:<br><br>a. Regular working hours do not exceed eight hours per day, or 48 per week. Where workers are employed in shifts the 8-hour day and 48-hour week may be exceeded, provided that the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week;<br><br>b. Workers are provided with at least 24 consecutive hours off in every 7-day period; and<br><br>c. Overtime is consensual, and limited to 12 hours a week.<br><br>d. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if:<br><br>i. A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and<br><br>ii. Through consultations with workers' | 3.1.11.1 | | The ENTITY ensures that:<br>a. For all its employees and individual contractors, regular working hours do not exceed 8 hours per day, or 48 hours per week ;<br>b. Where employees (and contractors whose working hours are under the ENTITY's direct control) work in shifts, the 8-hour day and 48-hour week is not exceeded unless the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week;<br>c. Employees and individual contractors are provided with appropriate paid time off for meals and breaks, i.e. unless otherwise provided for under a CBA, this means at least two 15-minute and one 30-minute break per 6 hours worked;<br>d. Employees and individual contractors are provided with reasonable accommodations of the timing of breaks to allow for workers' religious practices;<br>e. Contracting firms conform with a. to d. for all their employees, through controls, oversight, and/or contractual clauses as appropriate | *Builds on former 3.1.10.1, specifying application to employees and individual contractors and, where applicable, contractors for whom the entity has control over working hours.*<br><br>*a. and b. adaptations of former 3.1.10.1.a (separated out for clarity)*<br><br>*c. and d. new sub-requirement. See response to Consultation Question 3.1-09.*<br><br>*e. makes explicit entity obligations vis-à-vis contractors which in the 2018 Standard were covered by a clause in Chapter 1.1 requiring contractor compliance* |

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| | | representatives, a risk management process that includes a risk assessment for extended working hours is established to minimize the impact of longer working hours on the health, safety and welfare of workers. | 3.1.11.2 | | The ENTITY ensures that:<br>a. All employees are provided with at least 24 consecutive hours off in every 7-day period, unless a freely negotiated CBA is in force that allows variances to this rest period;<br>b. Overtime hours are allowed for employees as long as they are always consensual and limited to 12 hours per week unless a freely negotiated CBA is in force that allows variances to this overtime limit ;<br>c. If no negotiated CBA is in force to allow such variances, exceptions to a. and b. only occur if a process is in place, carried out in collaboration with workers' health and safety representatives, to assess, mitigate, and monitor the potential impacts of the alternative rest schedule and/or overtime limit on the safety, health and wellbeing of employees. If impacts to worker safety, health or wellbeing are occurring, the 24 consecutive hours off in every 7-day period and/or the 12-hour-maximum overtime per week rule, is reinstated until another assessment can be undertaken;<br>d. Hours worked, regular and overtime, by employees and individual contractors are recorded and documented;<br>e. Hours taken for annual, medical, and parental leave, by employees and individual contractors are recorded and documented; and<br>f. Contracting firms conform with d. and e. for all their employees, through controls, oversight, and/or contractual clauses as appropriate. | *a. adaptation of former 3.1.10.1.b*<br><br>*b. adaptation of former 3.1.10.1.c*<br><br>*c. adaptation of former 3.1.10.1.d, clarifying expectations if adverse impacts on workers are identified.*<br><br>*d., e. and f. new sub-requirements; added because this information is necessary to demonstrate conformity with other requirements in the IRMA Standard* |
| | | | 3.1.11.3 | IRMA+ | The Entity develops and implements controls, oversight and/or contractual clauses to ensure that all its suppliers also conform with requirements 3.1.11.1 and 3.1.11.2 in order to prevent risks of modern slavery and to ensure decent and healthy working conditions for all workers among its suppliers' workforce. | *New OPTIONAL requirement.* |
| ***3.1.1*** | | ***Human Resources Policy*** | | | | |
| 3.1.1.1 | | The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law. | | | | *Deleted - redundant with rest of chapter.* |
| 3.1.3.2 | | Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:<br>a. Targets or quotas mandated by law;<br>b. Targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; or<br>c. Operating company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets. | | | | *Now incorporated into guidance for 3.1.3.1.* |

# Chapter 3.2 Occupational Safety, Health and Wellbeing

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **3.2** | | **Occupational Health and Safety** | **3.2** | | **Occupational Health, Safety, and Wellbeing** | |
| ***3.2.1*** | | ***Health and Safety Management System*** | ***3.2.1*** | | ***Formalized Policy*** | |
| 3.2.1.1 | | The operating company shall implement a health and safety management system for measuring and improving the mining project's health and safety performance. | 3.2.1.1 | | The ENTITY has a formal policy in place that:<br>a. Commits to provide safe and healthy working conditions, to promote occupational wellbeing, to consultation and participation of workers, and, where they exist, workers' representatives, to eliminate hazards, to reduce occupational safety and health (OSH) risks, and to continuously improve the effectiveness of its OSH management systems;<br>b. Iis approved at the top management level of the ENTITY;<br>c. Is publicly accessible;<br>d. Is proactively communicated to all employees and all contractors; and<br>e. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the project/operation. | *New requirement aligned with Standard-wide structural changes requiring formalized policies in all relevant issue areas.*<br><br>*d.was included in guidance for former 3.2.1.1 ("commitment to provide the resources required to carry out these responsibilities").* |
| 3.2.1.1 | | The operating company shall implement a health and safety management system for measuring and improving the mining project's health and safety performance. | 3.2.1.2 | | At least one member of the Entity's top management level is accountable for the implementation of this policy at the level of the project/operation, through:<br>a. OSH objectives and key performance indicators and/or targets that are distinct for the three aspects individually (safety, health, and wellbeing);<br>b. These objectives and key performance indicators and/or targets are related to both lagging and leading indicators; and<br>c. They include distinct indicators and/or targets for employees and contractors (if relevant). | *Expands on former 3.2.1.1, adding details as to what constitutes the obligation to 'implement' a system to 'measure and improve' OSH performance.* |
| | | | 3.2.1.3 | IRMA+ | The entity has a system in place to:<br>a. Select new OSH supervisors and managers, including at the top management level of the entity, based on their intrinsic motivation for or proven record in safety, health, and wellbeing management and promotion;<br>b. Measure and document how often new OSH supervisors and managers, including at the top management level of the entity, are selected in accordance with 3.2.1.3.a; and<br>c. Track and document the percentage of new OSH supervisors and managers, including at the top management level of the entity, who showed a proven record in actively promoting OSH among those who came into office during the last 12 months. | *New (OPTIONAL) requirement.* |
| | | | ***3.2.2*** | | ***Scoping*** | |

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| | | | 3.2.2.1 | | A scoping process (or equivalent) is carried out and documented by competent professionals to:<br>a. Define the scope of OSH risks and impacts to be considered;<br>b. Define the boundaries and applicability of the ENTITY's OSH management system;<br>c. This process determines and considers external and internal issues that are relevant to the site and its associated facilities, and that affect the ENTITY's ability to achieve the intended outcome(s) of its OSH management system;<br>d. This process determines and considers: 1) the other interested parties, in addition to workers, that are relevant to the OSH management system; 2) the relevant needs and expectations of workers and other interested parties; and 3) which of these needs and expectations are, or could become, legal requirements; and<br>e. This process considers all the planned or performed work-related activities. | *New requirement aligned with Standard-wide structural changes requiring distinct scoping activities for all relevant issue areas.* |
| ***3.2.3*** | | ***Communication and Engagement with Workers and Others*** | ***3.2.3*** | | ***Meaningful Consultation and Participation of Workers*** | |
| 3.2.3.3 | | The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety. | 3.2.3.1 | | 3.2.3.1 The ENTITY has a system in place to enable and facilitate consultation and participation of workers in the development, planning, implementation, monitoring and evaluation, and continuous improvement of the OSH management system. This system ensures that the ENTITY:<br>a. Collaborates with worker's representatives to jointly identify and assess obstacles or barriers to meaningful participation of workers ;<br>b. Collaborates with worker's representatives to jointly develop and implement measures to remove those obstacles and barriers and to minimize those that cannot be removed ; and<br>c. Collaborates with worker's representatives to jointly develop and implement specific measures to involve non-managerial workers, and their representatives, in all consultation and participation mechanisms and training. | *Adds specificity concerning what is expected to "effectively" communicate and enable input from workforce (from former 3.2.3.3).* |

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| | | | 3.2.3.2 | | The consultation and participation system required in 3.2.3.1 identifies, in collaboration with workers and their representatives:<br>a. Which laws and regulations are applicable to communications and information-sharing with workers and their representatives, and how to comply with those;<br>b. How, when and in what formats relevant information will be communicated to workers to ensure that communications and information-sharing with workers and their representatives occur not only in compliance (see a.) but in a manner that is deemed meaningful and usable by workers, including to workers who present sensory disabilities and/or sensory impairment ;<br>c. Also in a manner that is culturally appropriate and easily accessible to workers ; and<br>d. Also in a manner that is deemed timely by workers. When information cannot be shared in a timely manner, the ENTITY systematically provides workers with a documented justification or explanation for the delay. | *Adds specificity concerning what is expected to "effectively" communicate and enable input from workforce (from former 3.2.3.3).*<br><br>*Note: also draws on intent expressed in guidance from former 3.2.1.1 ("organization's specific H&S objectives are conformed with and employees participate in the organization's H&S programs.")* |
| 3.2.3.4 | | The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:<br><br>a. Health and safety hazard identification and assessment;<br><br>**b. Design and implementation of workplace monitoring and worker health surveillance programs;**<br><br>c. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and<br><br>d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. | 3.2.3.3 | | The entity has a joint health and safety committee (or equivalent) that includes workers' health and safety representatives and entity's management:<br>a. It is mandated to facilitate dialogue and worker participation in matters relating to OSH, and to conduct joint inspections and investigations;<br>b. The workers' representatives on the joint committee are selected by workers ;<br>c. The workers' representatives on the joint committee make up 50% of more of the total number of members on the joint health and safety committee; and<br>d. The workers' representatives on the joint committee include representatives of non-managerial workers, to the extent possible . | *Draws on intent of former 3.2.3.4.d, but adds significant detail.* |
| 3.2.6.1 | | The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities and dangerous occurrences collected by the company and submitted to competent authorities. **This information, except for data protected for medical confidentiality reasons, shall be available to workers' health and safety representatives.** | 3.2.3.4 | | The workers' health and safety representatives on the committee are provided with the opportunity to:<br>a. Participate in inspections and investigations conducted at the workplace by the ENTITY and by the competent authority;<br>b. Participate in the design and implementation of workplace monitoring and worker health surveillance programs;<br>c. Monitor and investigate health and safety matters, and receive timely notice of accidents and dangerous occurrences; and<br>d. Access the following data and documentation: hazard identification, | *a. and b. former 3.2.3.5.a*<br><br>*c. former 3.2.3.5.d*<br><br>*d. expands upon former 3.2.6.1, detailing the full range of information to which OSH reps must have access.* |

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| 3.2.3.5 | | The operating company shall provide workers' health and safety representatives with the opportunity to:<br><br>a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace;<br><br>b. Monitor and investigate safety and health matters;<br><br>c. Have recourse to advisers and independent experts; and<br><br>d. Receive timely notice of accidents and dangerous occurrences. | | | risk assessments, risk management plans, procedures, training materials, monitoring data, health surveillance results, inspection reports, and reports related to unwanted events including those submitted to regulatory authorities. | |
| | | | 3.2.3.5 | | To enable the effective participation of the workers' representatives in the joint committee, the Entity ensures that they:<br>a. Receive free training, relevant to their prerogatives;<br>b. Have access to resources, and recourse to advisers and independent experts, as necessary, to participate effectively; and<br>c. Are entitled to take time from regular work duties, with pay, to carry out committee related responsibilities. | *Builds on former 3.2.3.5.*<br><br>*a. new sub-requirement*<br><br>*b. former 3.2.3.5.c*<br><br>*c. new sub-requirement* |
| ***3.2.2*** | | ***Health and Safety Risk Assessment and Management*** | ***3.2.4*** | | ***Hazard Identification and Risk Assessment*** | |
| 3.2.2.1 | | The operating company shall implement an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations. | | | | *Expands upon former 3.2.2.1, 3.2.2.2, 3.2.2.3 and 3.2.2.5, adding significant detail as to the expected scope of the 'ongoing systematic' risk assessment process. b. and c. were expected as part of a 'credible methodology'*<br><br>*Previously, the hazard identification step was combined with the risk assessment process as a whole. We are proposing to separate it out, primarily because if hazards are not identified in a comprehensive manner, there is the potential that important hazards may be overlooked when considering how best to eliminate and minimize serious health and safety risks to workers and others who may be present at a site. Furthermore, separating out this step ensures that it will be given adequate attention and review during audits.*<br><br>*a. incorporates hazards indicated in former 3.2.2.2 and 3.2.2.5 into an Annex*<br><br>*b. incorporates parts of former 3.2.2.2*<br><br>*c. new sub-requirement*<br><br>*d. new sub-requirement, however* |
| 3.2.2.2 | | The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:<br><br>a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and machinery, and waste and chemical management;<br><br>b. All personnel, contractors, business partners, suppliers and visitors;<br><br>c. Unwanted events;<br><br>d. Routine and non-routine activities, products, procedures, and services; and<br><br>e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services. | 3.2.4.1 | | A process is carried out by competent professionals to identify, and document in a hazard register (or equivalent), the hazards that are, or may be, associated with the site and associated facilities, including:<br>a. Safety, chemical, biological, physical, ergonomic, and psychosocial hazards, informed by a comprehensive review of the Potential Workplace Hazards listed in Annex 3.2-A;<br>b. Hazards associated with the design of the workplace, organization of work, routine and nonroutine tasks, and foreseeable emergency scenarios;<br>c. External factors with the potential to exacerbate a hazard or affect the entity's management of hazards;<br>d. This process identifies, and documents in the hazard register, the categories of people, including employees, contractors, suppliers, visitors, who may be harmed by each hazard;<br>e. It also identifies, and documents in the hazard register, any individuals or sub-categories who may be particularly susceptible to the hazard ; and<br>f. It is carried out in collaboration with workers' health and safety representatives and relevant workers . | |
| 3.2.2.3 | | The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to particular hazards. | | | | |

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| 3.2.2.5 | | In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:<br><br>a. Ensure that the mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment;<br><br>b. Ensure that the mine is commissioned, operated, maintained and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons;<br><br>c. Maintain the stability of the ground in areas to which persons have access in the context of their work;<br><br>d. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface;<br><br>e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted;<br><br>f. Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards;<br><br>g. Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and<br><br>h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location. | | | | *formerly implicit in 3.2.2.3 as paying attention to differential risks to various stakeholders not possible without understanding those risks.*<br><br>*e. incorporates intent of former 3.2.2.3, but asks for it to be a formal part of hazard assessment rather than something the entity 'pays attention to' (i.e. former 3.2.2.3)*<br><br>*f. former 3.2.3.4.a (participation of H&S reps in hazard identification and assessment)*<br><br>*Note: Annex 3.2-A contains a list of the principal hazards previously constituting part of 3.2.2.5, with additions specific to mineral processing.* |

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| 3.2.3.4 | | The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:<br><br>a. Health and safety hazard identification and assessment;<br><br>b. Design and implementation of workplace monitoring and worker health surveillance programs;<br><br>c. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and<br><br>d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. | 3.2.4.2 | | Building on the hazard identification required in 3.2.4.1, a risk assessment is carried out and documented by competent professionals, in collaboration with workers' health and safety representatives and relevant workers , to:<br>a. Determine the exposure levels, potential severity of consequences, and probability of occurrence, of all hazards identified as per 3.2.4.1;<br>b. Identify any existing controls for the identified hazards, and identify high-risk (or equivalent) hazards for which additional controls will be prioritized, including those that have caused or have a reasonable potential to cause a life-altering or fatal injury or disease;<br>c. Identify key potential emergency scenarios including, but not limited to, all potential accidents that have a moderate or high severity or probability of occurrence;<br>d. This process documents any assumptions made in relation to the number of people at risk, the probability, and severity of consequences for each hazard that inform the level of risk assigned to each hazard;<br>e. It documents any criteria used to determine the high-risk activities or conditions for which additional controls will be prioritized; and<br>f. It documents any criteria used to determine the reasonably-foreseeable key potential emergency scenarios. | *a. Expands upon former 3.2.3.4.a, adding details about the particular ways in which OSH representatives can input into hazard identificaiton and assesment, including clarifying that part of the process may involve specific baseline data collection or studies to inform the risk assessment (see IRMA response to Consultation Question 3.2-06).*<br><br>*b. and c. expand upon intent of former 3.2.3.4 b and c.*<br><br>*d. to f. are new sub-requirements.* |
| | | | ***3.2.5*** | | ***Management Plan and Procedures*** | |
| 3.2.2.4 | | The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards. | 3.2.5.1 | | They entity consults with workers' health and safety representatives and relevant workers to develop controls for high-risk hazards in a manner that aligns with the widely accepted hierarchy of controls, including:<br>a. The process of selecting controls is documented;<br>b. The hierarchy of controls has been considered in proper sequence, beginning with serious consideration of the most effective strategies, even if they are the most expensive ; and<br>c. A rationale for rejecting higher hierarchy controls is systematically provided . | *Builds on intent of former 3.2.2.4, separating out the constituent parts into sub-requirements and adding more specificity as to process for clarity.*<br><br>*Incorporates intent of guidance to former 3.2.2.4 ("In other words, the operating company should develop a system of controls for the elimination of risk through re-design of the activity or work area to eliminate hazards. Where elimination of the hazard is not possible, control measures should be implemented to reduce the risk at source, and procedural controls developed to limit exposure to the hazard.").* |
| | | | 3.2.5.2 | | Building on 3.2.4, an OSH risk management plan (or equivalent) is developed and documented by competent professionals to manage high-risk hazards. The plan:<br>a. Outlines specific controls to address the high-risk hazards identified through the assessment process, and these controls have been | *Incorporates intent of former 3.2.2.4.*<br><br>*a. incorporates expectation for OSH representative participation from former 3.2.3.4.c* |

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| 3.2.3.4 | | The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:<br><br>a. Health and safety hazard identification and assessment;<br><br>b. Design and implementation of workplace monitoring and worker health surveillance programs;<br><br>**c. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and**<br><br>d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. | | | selected in collaboration with workers' health and safety representatives and relevant workers as per 3.2.3.1;<br>b. Includes performance indicators of effectiveness for each control ; and<br>c. Includes specific measures to be taken if the controls are not working within established performance indicators. | |
| 3.2.4.2 | | If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers. | 3.2.5.3 | | Besides the OSH risks identified and included in the OSH risk management plan required in 3.2.5.2, the plan at least includes and addresses:<br>a. All unique OSH risks to the specific individuals or sub-categories who may be particularly susceptible to hazards (see 3.2.4.2.b ) identified in the risk assessment required in 3.2.4.3;<br>b. All OSH risks associated with the hazards listed in Annex 3.2-B, that are applicable to the site and associated facilities; and<br>c. If any of the OSH risks mentioned in 3.2.5.3.a and 3.2.5.3.b are not covered in the OSH risk management plan, the Entity can demonstrate that documented procedures or measures are in place and implemented to address them. | *Incorporates former 3.2.4.2 + expand expectations to "Principal Hazards" that should systematically be addressed.* |
| | | | 3.2.5.4 | | To ensure effective implementation of the OSH risk management plan, the Entity:<br>a. Assigns implementation of actions to responsible staff with adequate skills and expertise;<br>b. Assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping;<br>c. Has clearly-defined timelines and an implementation schedule in place that specifies the expected outcomes;<br>d. Maintains estimates of human resources and budget required; and<br>e. Has a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *New requirement, aligned with Standard-wide changes to expectations re: resourcing and implementation of management plans.*<br><br>*d. and e. draw on intent in guidance for former 3.2.1.1 ("commitment to provide the resources required to carry out these responsibilities").* |

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| 3.2.3.4. | | The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:<br>...<br>d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. | 3.2.5.5 | | To protect and promote health and wellbeing in the workplace, the Entity collaborates with workers and workers' health and safety representatives to:<br>a. Review psychosocial hazards and identify those that are priority concerns for workers;<br>b. Develop and implement programs to support the mental health of workers; and<br>c. Develop and implement programs to encourage and promote overall health and wellbeing in the workplace. | *Expands on former 3.2.3.4.d, aligned with enhanced focus in the chapter on worker wellbeing (in addition to health and safety).* |
| | | | ***3.2.6*** | | ***Infectious Diseases*** | |
| 3.3.4.2 | | If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:<br><br>a. In relation to HIV/AIDS, the operating company shall, at minimum:<br>i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;<br>ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate;<br>iii. Provide access for contractors to education and other preventative programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and<br>iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members.<br><br>b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.<br><br>c. In relation to malaria, the operating company shall, at minimum:<br>i. Develop a vector control plan;<br>ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and<br>iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing. | 3.2.6.1 | | If the risk assessment required in 3.2.4.3 indicates a significant risk of worker exposure to HIV/AIDS, the Entity:<br>a. Provides free, voluntary and confidential HIV testing and counseling for all workers;<br>b. Provides HIV/AIDS treatment for employees where not covered by public or private insurance schemes at an affordable rate; and<br>c. Provides contractors with access to education and other preventative programs, and works with contracting firms to identify ways for contractors to access affordable HIV/AIDS treatment. | *Previously in the Community Health and Safety chapter. The worker-related requirements have been separated out and added into this chapter, as they are more relevant here.*<br><br>*a.former 3.3.4.2.a.i*<br>*b. former 3.3.4.2.a.ii*<br>*c. former 3.3.4.2.a.iii* |
| | | | 3.2.6.2 | | If the risk assessment required in 3.2.4.3 indicates a significant risk of worker exposure to tuberculosis, the Entity provides free and voluntary testing for workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate. | *Former 3.3.4.2.b* |
| | | | 3.2.6.3 | | If the risk assessment required in 3.2.4.3 indicates a significant risk of worker exposure to malaria, the Entity:<br>a. Has a vector control plan (or equivalent);<br>b. Takes action to prevent the site and associated facilities from becoming breeding environments for malaria-carrying mosquitoes; and<br>c. Provides protection from infection by malaria-carrying mosquitoes at the site and associated facilities, and any housing provided to workers by the Entity. | *Former 3.3.4.2.c. (i-iii)* |

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| | | | 3.2.6.4 | | If the risk assessment required in 3.2.4.3 indicates a significant risk of worker exposure any emerging infectious disease (including SARS-CoV-2 (COVID-19)), the ENTITY:<br>a. Provides training at no cost for workers on preventive measures to reduce the risk of infection and spread of the disease;<br>b. Provides health screening to workers and visitors, testing to workers;<br>c. Provides, if available, a voluntary vaccination program at no cost to workers;<br>d. Cleans and disinfects the working environment based on best international guidance, and provides suitable personal protective equipment to workers and visitors at no cost;<br>e. Modifies shift patterns and changeover times to minimize close contact between workers and/or contractors;<br>f. Provides for isolation and/or medical treatment of workers where infection is suspected or confirmed; and<br>g. Suspends non-essential activities, or all activities, if necessary. | *New requirement to address COVID-19, which emerged following the release of the 2018 Standard, and any other emerging infectious disease.* |
| | | | ***3.2.7*** | | ***On-Site Emergency Preparedness and Response*** | *As introduced in the 2023 draft, 3.2.7.1 to 3.2.7.3 incorporate workplace-focused emergency preparedness and response requirements from former Chapter 2.5 (now 2.6, that chapter focuses on emergency preparedness and response planning that occurs off-site).*<br><br>*We have expanded on the expectations beyond what was in the 2018 Mining Standard.*<br>*•3.2.7.1.b, having mechanisms to alert workers in emergency situations is based on similar requirements in Mining Association of Canada (MAC) Crisis Management Protocol.*<br>*•3.2.7.2. a and b the frequency of review (and the frequency of tabletop and drills) aligns with MAC protocol.*<br>*•3.2.7.3 a and b, providing sufficient emergency response equipment and inspecting that equipment, was added based on similar requirements in the RBA/RMI ESG standard for Mineral Supply Chains.* |
| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | 3.2.7.1 | Critical | To address the key on-site emergency scenarios identified in the risk assessment process as per 3.2.4.3.c:<br>a. Emergency preparedness and response plans (or equivalent) are developed and documented by competent professionals, in collaboration with workers' health and safety representatives and relevant workers;<br>b. These plans include mechanisms to alert workers about emergency situations, and response measures, including evacuation plans if relevant, to be taken for all key emergency scenarios identified;<br>c. These plans provide clear definition of roles, responsibilities and relationships of all employees and contractors responsible for the development and/or implementation of some or all of the plan and associated procedures; and<br>d. These plans are accessible to all workers in languages and formats that are comprehensible to them. | |
| 2.5.2.1 | Critical | The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises. | | | | |
| 2.5.1.2 | | The operating company shall:<br><br>a. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and<br><br>b. Update the communications contacts of the emergency response plan at least annually. | 3.2.7.2 | Critical | The following types of training and testing are performed and documented to test emergency response plans:<br>a. At least annually, and without delay if the ENTITY has developed or undertaken significant modifications to the plan, table top discussions that include ENTITY personnel responsible for emergency response, relevant workers' health and safety representatives, and local emergency response personnel if relevant, and testing of alert mechanisms;<br>b. At least every three years, and without delay if the ENTITY has developed or undertaken significant modifications to the plan, a full, on-the-ground, emergency response simulation with the ENTITY's personnel responsible for emergency response, relevant workers' health and safety representatives, workers, and local emergency response personnel if relevant; and | |

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| 4.1.7.3. | | Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. | | | c. Lessons learned and identified corrective measures and actions are documented. | |
| 2.5.1.1 | Critical | All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in *United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL)* for Mining. | 3.2.7.3 | | As part of the emergency preparedness and response plans, Entity also ensures that:<br>a. The workplace is equipped with emergency response equipment in sufficient quantities and in working condition to respond appropriately to foreseeable emergencies;<br>b. All emergency response equipment is inspected on an annual basis; and<br>c. Relevant first responders receive training in first aid, fire-fighting, and handling of hazardous chemicals and materials, as relevant. | |
| 3.2.4.1 | Critical - a and b only | The operating company shall implement measures to protect the safety and health of workers including:<br>...<br>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground. | 3.2.7.4 | | If the site and/or associated facilities involve underground work, the Entity implements a system to identify and track at any time the most-probable locations of all individuals who are underground. | *Former 3.2.4.1.f* |
| 3.2.3.2 | | In all cases a worker attempting to exercise any of the rights referred to in 3.2.2.1 in good faith shall be protected from reprisals of any sort. | 3.2.7.5 | | 3.2.7.5 A Stop Work Authority (SWA) procedure (or equivalent) is developed and implemented, in collaboration with workers' representatives . The SWA procedure:<br>a. Ensures that all employees and contractors are provided with the right, the responsibility, and the authority to either refuse to undertake or to stop work if they believe that conditions or behaviors could reasonably cause serious physical harm, chronic health effects, or damage to the facility, community, environment, and cannot be promptly resolved through routine mechanisms;<br>b. Ensures that the authority to stop work with reasonable justification may be exercised by employees or contractors without fear of reprisal by the ENTITY or their employers;<br>c. Ensures that retaliation by other workers will not be tolerated ;<br>d. Outlines the conditions whereby workers may initiate a stop work action;<br>e. Outlines who needs to be notified of the stop work action;<br>f. Outlines the investigation process to determine validity of the stop work action (see 3.2.7.6 and 3.2.7.7);<br>g. Outlines a process for coming to agreement on any containment or corrective measures and verifying that those measures have been implemented before work is restarted;<br>h. Outlines who has authority to restart work, and any monitoring that need to occur after work has resumed to ensure that corrective measures remain effective; and<br>i. Outlines follow-up steps for communicating the event to relevant workers, contractors and management, and integrating learning from the stop work event . | *Builds upon intent of former 3.2.3.1 and 3.2.2.5, which both refer to the rights of workers to remove themselves (or be removed) from hazardous working conditions.*<br><br>*c. from former 3.2.3.2*<br><br>*d. to i. are new sub-requirements to add detail to the concept of SWA (which itself is based on the intent of former 3.2.3.1.e)* |
| 3.2.3.1 | | Workers shall be informed of their rights to:<br>...<br>e. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and | | | | |
| 3.2.2.5 | | In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:<br>...<br>h. Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location. | | | | |

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| 3.2.3.1 | | Workers shall be informed of their rights to:<br>...<br>a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority;<br><br>b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority; | 3.2.7.8 | | A reporting and investigation procedure (or equivalent) is developed and implemented, in collaboration with workers' representatives, to establish the steps to be taken by workers, internal inspectors, and/or others, to inform the ENTITY of unwanted events or unsafe working conditions . This procedure:<br>a. Outlines the rights and responsibilities of workers, internal inspectors, and/or others to report unwanted events, ineffective controls, or unsafe working conditions;<br>b. Outlines the process to be followed when reporting unwanted events or unsafe working conditions, including who to contact, how to contact them, what types of information to include, and any forms that need to be submitted as part of the process;<br>c. Ensures that workers, internal inspectors, and others can use this procedure without fear of reprisal by the ENTITY, and that retaliation by other workers for reporting unwanted events will not be tolerated ;<br>d. Outlines a provision that any use of stop work authority by workers or internal inspectors is investigated promptly and expected timelines for commencing investigations of other reported unwanted events or unsafe working conditions;<br>e. Outlines who participates in different types of investigations ; and<br>f. How the outcomes of investigations are communicated to workers and others. | *a. and b. incorporate intent of former 3.2.3.1, which stated that workers are to be informed of their rights to reporting and investigation of incidents. This requirement (3.2.7.8), however, asks that these rights be incorporated into a reporting and investigation procedure.*<br><br>*c. from former 3.2.3.2*<br><br>*d. to f. are new sub-requirements.* |
| 3.2.3.2 | | In all cases a worker attempting to exercise any of the rights referred to in 3.2.2.1 in good faith shall be protected from reprisals of any sort. | | | | |
| | | | ***3.2.8*** | | ***OSH of Contractors*** | |
| | | | 3.2.8.1 | | A system is developed and implemented to manage the OSH of all contractors. The system includes:<br>a. Clear stipulation of consequences if OSH performance of contractors does not meet the ENTITY's expectations;<br>b. A clear process for communicating with, and receiving input from, contractors on OSH matters;<br>c. A documented system for monitoring contractors' OSH performance, overseen by a member of the ENTITY's top management;<br>d. A signed contract between the ENTITY and each contracting firm or individual contractor, that outlines how the OSH of contractors will be managed in a manner that aligns with the requirements of this Chapter. | *New requirement; however, draws on intent of guidance to former 3.2.2.2 ("As per IRMA Chapter 1.1, the operating company is responsible for ensuring that contractors (and subcontractors) involved in mining-related activities comply with the occupational health and safety requirements of the IRMA Standard, i.e., contract workers and any other workers who provide project-related work and services should be afforded a safe and healthful work environment.")* |

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| | | | 3.2.8.2 | | The contract required in 3.2.8.1.d addresses :<br>a. The ENTITY's and contractors' rights and responsibilities ;<br>b. The right of the ENTITY specifically to carry out inspections of work areas and work being conducted by contractors (see 3.2.3 and 3.2.11);<br>c. Training those carrying out contracted work on hazards, controls and any relevant plans and procedures that apply to them, such as stop work authority, and emergency response and reporting procedures (see Sections 3.2.5 and 3.2.7);<br>d. Reporting unsafe conditions and unwanted events to the ENTITY and government authorities (see 3.2.12.4);<br>e. Identification of hazards associated with contracted work (see 3.2.4.1), including responsibility to notify the ENTITY if the contractor proposes to introduce new or different tools, equipment, materials, chemicals or work processes that could pose a new hazard or elevated risk to contractors and/or ENTITY personnel;<br>f. Assessment of risks associated with contracted work (see 3.2.4.3);<br>g. Development of controls for high-risk hazards associated with contracted work (see 3.2.5);<br>h. Workplace monitoring and health surveillance and evaluation of the effectiveness of the controls (see 3.2.11.2); and<br>i. Provision and oversight of the proper use of personal protection equipment (see 3.2.9.3 and 3.2.9.2.c, respectively). | *See response to requirement 3.2.8.1, above.* |
| ***3.2.4*** | | ***Measures to Protect Workers*** | ***3.2.9*** | | ***Specific Measures to Protect Workers*** | |
| 3.2.3.3 | | The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety. | 3.2.9.1 | | The Entity has a system in place to communicate information to workers on matters related to OSH. This system ensures that:<br>a. Health and safety data sheets, labels, and signage in the workplace are in formats and languages that are understandable to the workers;<br>b. Health and safety data sheets, labels, and signage in the workplace are maintained in legible/understandable condition, and kept up to date; and<br>c. Workers can provide input on matters related to OSH, and their input will be considered and responded to. | *Incorporates components of former 3.2.4.1.*<br><br>*a. and b. incorporate the intent of former 3.2.4.1 (informing workers in a comprehensible manner)*<br><br>*c. former 3.2.3.3* |
| 3.2.4.1 | Critical - a and b only | The operating company shall implement measures to protect the safety and health of workers including:<br><br>a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; | | | | |

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| | | **b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;**<br><br>c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;<br><br>**d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;**<br><br>**e. Providing adequate supervision and control on each shift; and**<br><br>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground. | 3.2.9.2 | | The Entity ensures that every shift has competent supervision that:<br>a. Is at a level commensurate with the risks and the competence of workers;<br>b. Provides oversight and enforcement of adherence to relevant procedures and controls related to the tasks being carried out; and<br>c. Ensures consistent and correct usage of personal protective equipment and clothing appropriate to the working environment. | *Expands on former 3.2.4.1.e, adding detail to what constitutes "adequate supervision" for shifts.* |
| | | | 3.2.9.3 | Critical | The Entity ensures that personal protective equipment, and working clothes and shoes:<br>a. Are provided, at no cost, to workers when exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;<br>b. Are fit for purpose, and the size and fit are gender-appropriate and provide adequate protection; and<br>c. Are maintained by the Entity in clean and good working condition<br>d. Are replaced, at no cost, as necessary. | *Expands on former 3.2.4.1.b. Critical because former 3.2.4.1.b was critical.*<br><br>*b. to d. add detail as to expectations for PPE.* |
| | | | 3.2.9.4 | | Building on the risk assessment process required in 3.2.4, the Entity ensures that first aid is available on site as follows:<br>a. The minimum number of workers with up-to-date certified first aid training is: 1) one every 50 workers for low-risk work areas; 2) one every 25 workers for high-risk work areas that have timely access to medical and ambulance services; and 3) one every 10 workers for high-risk work areas that do not have such timely access to medical and ambulance services;<br>b. Workers have unrestricted access to first aid and rapid response equipment appropriate to the work area; and<br>c. In areas where chemicals are stored, handled, and used, safety data sheets and instructions on first aid for all potential exposure routes are available (see also 3.2.9.1). | *a. expands on forrmer 3.2.4.1.d, specifying the type of training workers should receive (i.e. first aid, in this case) and adding additional details for clarity. See response to Consultation Question 3.2-04.*<br><br>*b. incorporates intent of forrmer 3.2.4.1.c (clarifying that all workers - not just those who have suffered an injury - should have access to first aid and rapid response equipment).*<br><br>*c. builds on former 3.2.4.1.d reference to 'comprehensible instructions' relating to OSH (first aid in this case).* |

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| 3.2.4.3 | | **The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation.** Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers. | 3.2.9.5 | | The Entity ensures that workplaces include:<br>a. Safe, potable water that is readily accessible to workers;<br>b. Clean toilet, washing and locker facilities commensurate with the number and gender of workers and that accommodate LGBTIQA+ workers;<br>c. Sanitary facilities for eating and storing food.<br>d. Primary and emergency power supply and lighting, and adequate ventilation, in particular for confined spaces and underground workings;<br>e. Fire safety equipment and alarms; and<br>f. Clearly marked, unlocked and unblocked evacuation routes and emergency exits, including, for any underground workplace, two exits that are each connected to separate means of egress to the surface where practicable. | *Adaptation of former 3.2.4.3. Now also addresses the needs of LGBTIQA+ workers.*<br><br>*Note, [housing] accommodations reference in former 3.2.4.3 now addressed in section 3.2.10.*<br><br>*d. to f. expand upon former 3.2.2.5.a, d, and e.* |
| 3.2.2.5 | | In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:<br><br>**a. Ensure that the mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment;**<br>...<br>**d. If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface;**<br><br>**e. If relevant, ensure adequate ventilation for all underground workings to which access is permitted** | | | | |
| | | | ***3.2.10*** | | ***Workers' Housing*** | |
| 3.2.4.3 | | The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. **Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers.** | 3.2.10.1 | | The Entity ensures that any housing it provides to workers provides:<br>a. Safe and potable water in the dwelling in quantities sufficient to provide for all personal and household uses;<br>b. Adequate sanitary and washing facilities, ventilation, cooking and storage facilities;<br>c. Adequate natural and artificial lighting;<br>d. Adequate sewage and garbage disposal systems;<br>e. Appropriate protection against heat, cold, damp, noise, fire, and disease-carrying animals and insects; and<br>f. A reasonable degree of privacy both between individuals within the household, and for the members of the household against undue disturbance by external factors . | *Expands significantly on what constitutes accommodations that are "clean, safe,and meet basic needs of workers" from former 3.2.4.3.*<br><br>*Gaps identified in RRA benchmark, and aligns with ILO Recommendations* |

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| | | | 3.2.10.2 | | Where housing is provided by the Entity to single workers or workers separated from their families, the Entity ensures that any of such housing provides:<br>a. A separate bed for each worker, and beds are not arranged in tiers of more than two;<br>b. Adequate safety, including sleeping rooms, and toilet and bathroom facilities, that are separated by gender and can accommodate the needs of LGBTIQA+ workers; and<br>c. Common dining rooms, canteens, recreation rooms that are located away from the sleeping areas, and, where not otherwise readily accessible and available in a nearby community, health facilities. | *Expands significantly on what constitutes accommodations that are "clean, safe,and meet basic needs of workers" from former 3.2.4.3.* |
| | | | 3.2.10.3 | | The Entity also ensures that, during time spent in housing provided by the Entity, workers are able to enjoy their fundamental human rights, including:<br>a. The right to liberty and security of person;<br>b. The freedom of movement; and<br>c. The freedom of association. | *See response to Consultation Question 3.2-05. This new requirement draws on guidance from former 3.2.2.2 ("Workers have the right to health...companies should include an assessment of the potential that employees may be exposed to unacceptable health impacts."), making it explicit that potential health impacts to workers that may occur in relation to inadequate housing arrangements that limit the rights to security and movement, etc. and must be managed accordingly.* |
| ***3.2.5*** | | ***Inspections, Monitoring and Investigations*** | ***3.2.11*** | | ***Inspections, Workplace Monitoring and Health Surveillance*** | |
| 3.2.3.5 | | The operating company shall provide workers' health and safety representatives with the opportunity to:<br><br>**a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace;**<br>**…** | 3.2.11.1 | | 3.2.11.1 The ENTITY, and workers' health and safety representatives if they so choose , have a joint inspection program (or equivalent) in place that:<br>a. Ensures joint inspections of the working environment are conducted to identify any hazards to which workers may be exposed, and to evaluate the effectiveness of OSH controls and protective measures;<br>b. Includes a plan that outlines the frequency of inspections for different work areas/tasks/equipment, ensuring coverage of the entire site and all high-risk hazards each year;<br>c. Empowers those carrying out inspections to use stop work authority if a hazard is uncovered that poses a threat to the health or safety of any person(s); and<br>d. Documents, in an inspection report , any observed unsafe conditions and actions, recommended containment and/or corrective measures, and their priority levels . | *Adds significant detail to former 3.2.5.1. Also incorporates intent of former 3.2.3.5 (right of OSH reps to participate in inspections).* |
| 3.2.5.1 | | The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, **and to evaluate the effectiveness of occupational health and safety controls and protective measures.** | 3.2.11.2 | | A workplace monitoring and health surveillance program is in place to measure exposures to the relevant significant hazards, and to evaluate the effectiveness of the OSH controls being implemented to protect health and safety as follows:<br>a. Workplace monitoring and worker health surveillance are | *a. former 3.2.5.2.a*<br><br>*b. incorporates part of former 3.2.3.5 (participation in inspections / surveillance) as well as 3.2.5.1* |

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| 3.2.5.2 | | The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:<br><br>a. Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals;<br><br>b. Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests;<br><br>c. Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory;<br><br>d. Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and<br><br>e. If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits. | | | designed and conducted by certified industrial hygienists or other competent professionals;<br>b. Workers' health and safety representatives have the opportunity to suggest improvements to the design, and to participate in the implementation of workplace monitoring and worker health surveillance programs;<br>c. Health surveillance is carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests;<br>d. Samples collected for workplace monitoring and health surveillance purposes are analyzed in an ISO/IEC-17025-certified or nationally accredited laboratory, if available in the country of operation;<br>e. Sample results are documented, and compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and<br>f. Whenever an OEL/BEI is exceeded: 1) Affected people are informed immediately, and provided with instructions on the appropriate actions to take ; 2) any supervisors and management not present at the affected location are informed as soon as possible; and 3) controls are reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits. | *(evaluation of the effectiveness of measures)*<br><br>*c. from former 3.2.5.2.b*<br><br>*d. to f. adaptation of former 3.2.5.2.c, d, and e.* |
| | | | ***3.2.12*** | | ***Response to Unsafe Working Conditions and Unwanted OSH Events*** | |
| | | | 3.2.12.1 | | The Entity can demonstrate that, if unsafe working conditions are observed and reported by workers including managers and supervisors, inspectors, or others, they are investigated in a timely manner, in accordance with the procedure required in 3.2.7.8 and 3.2.7.9. | *New requirement.* |
| | | | 3.2.12.2 | | Whenever an investigation verifies that there is an imminent and serious threat to human health, the ENTITY ensures that<br>a. In cases where an area is affected, all workers are evacuated immediately;<br>b. Workers re-entering the affected area to reinstate safe working conditions are protected from harm;<br>c. Working conditions in the affected area are verified as safe before general workers and contractors are allowed to enter; and<br>d. In cases where machinery or equipment is the cause of unsafe working conditions, use of the machinery or equipment ceases immediately, the equipment or machinery is fixed or replaced by an appropriate trained specialist, and the equipment or machinery is verified as safe before being put into service. | *New requirement.* |

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| 3.2.4.1 | Critical - a and b only | The operating company shall implement measures to protect the safety and health of workers including:<br>...<br>c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; | 3.2.12.3 | | Whenever a near miss incident, accident, injury, illness or fatality occurs in the workplace, the Entity ensures that:<br>a. Workers who have suffered an injury or illness are provided with first aid, and, if necessary, prompt transportation from the workplace to appropriate medical facilities;<br>b. Affected workers, including those present at the time of an accident, are offered counseling or other forms of psychological support;<br>c. The events are reported to the joint health and safety committee and accountable member of the Entity's top management, and, if required, to the competent authority;<br>d. The events are investigated as per requirement 3.2.7.6, and include a root cause analysis and a determination of whether any near miss incidents are also high potential incidents (HPI);<br>e. Corrective action plans are developed and implemented; and<br>f. The circumstances surrounding the event, the investigation, the corrective action plans and the outcomes are documented, and the outcomes are communicated to workers in accordance with 3.2.7.6. | *Combines and expands upon former 3.2.4.1 and 3.2.5.4.*<br><br>*Regarding addition of 3.2.12.4.b, see response to Consultation Question 3.2-09.*<br><br>*d. to f. new sub-requirements* |
| 3.2.5.4 | | The operating company shall ensure that all workplace injuries, fatalities, accidents and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, investigated and that appropriate remedial action is taken. | | | | |
| | | | ***3.2.13*** | | ***Education and Training*** | |
| 3.2.3.1 | | Workers shall be informed of their rights to:<br><br>a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority;<br><br>b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority;<br><br>c. Know and be informed of workplace hazards that may affect their safety or health;<br><br>d. Obtain information relevant to their safety or health, held by the employer or the competent authority;<br><br>e. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and<br><br>f. Collectively select safety and health representatives. | 3.2.13.1 | | The Entity ensures that workers are informed of their rights to:<br>a. Know and be informed of workplace hazards that may affect their safety or health;<br>b. Collectively select safety and health representatives;<br>c. Report accidents, dangerous occurrences and hazards to the entity and to the competent authority;<br>d. Either refuse to undertake or to stop work if they believe that conditions or behaviors pose an imminent and serious danger to the health or safety of themselves or others, or serious risk of harm to the environment, in accordance with the SWA procedure required in 3.2.7.5;<br>e. Request and obtain inspections and investigations by the ENTITY and the competent authority where there is cause for concern on safety and health grounds; and<br>f. Obtain personal data and information held by the ENTITY or the competent authority that is relevant to their safety or health . | *a. former 3.2.3.1.c*<br><br>*b. former 3.2.3.1.f*<br><br>*c. former 3.2.3.1.a*<br><br>*d. adaptation of former 3.2.3.1.e*<br><br>*e. former 3.2.3.1.b*<br><br>*f. former 3.2.3.1.d and 3.2.6.3* |
| 3.2.6.3 | | The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations. | | | | |
| 3.2.3.2 | | In all cases a worker attempting to exercise any of the rights referred to in 3.2.2.1 in good faith shall be protected from reprisals of any sort. | 3.2.13.2 | | The Entity ensures that, in all cases, workers attempting to exercise in good faith any of the rights referred to in 3.2.13.1 and 3.2.13.2 are protected from reprisals or retaliation of any sort. | *Former 3.2.3.2* |

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| 3.2.4.1 | Critical - a and b only | The operating company shall implement measures to protect the safety and health of workers including:<br>...<br>d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; | 3.2.13.3 | | The Entity has an OSH training program in place, as follows:<br>a. All workers receive an initial general training before they are allowed to commence their work;<br>b. All workers receive specific task training under supervision for a required period before they are deemed qualified to undertake the work without immediate supervision, and retraining takes place periodically;<br>c. Effectiveness of training is assessed and worker competency for conducting work safely is verified using a variety of techniques;<br>d. Records of worker attendance and competency evaluations are maintained;<br>e. Trainings are conducted by competent professionals, and in formats and languages that are understandable and appropriate to the workers trained; and<br>f. Trainings are free for all employees and contractors. | *Expands upon former 3.2.4.1.d, adding significant detail to worker training expectations.*<br><br>*Note: also incorporates intent of guidance to former 3.2.1.1 ("Ensures all personnel are competent to carry out their designated function").* |
| ~~3.2.1.1~~ | ~~———~~ | ~~_____~~<br>The operating company shall implement a health and safety management system for measuring and improving the mining project's health and safety performance.<br>*(Guidance: [...]Ensures all personnel are competent to carry out their designated function[...])* | 3.2.13.4 | Critical | The content of the training program required in 3.2.13.3 ensures that workers are trained on:<br>a. The range of specific health and safety hazards associated with specific job/tasks, as identified through the hazard identification and risk assessment process required in 3.2.4;<br>b. How to perform routine and non-routine tasks in a manner that avoids placing themselves or others at risk;<br>c. Control measures that have been developed to prevent and respond to high-risk hazards relevant to specific jobs/tasks;<br>d. Procedures that have been developed that are specific to their work area/job/tasks ;<br>e. The proper use and fitting of personal protective equipment;<br>f. How to identify workplace hazards, and how to exercise their stop work authority in accordance with the SWA procedure required in 3.2.7.5;<br>g. Any off-site emergency response plans developed as per Chapter 2.6 that are relevant to them;<br>h. The reporting and investigation procedure required in 3.2.7.6; and<br>i. How to access first aid and medical assistance. | *See above. (re. g.: Note that training in relation to the onsite emergency response plan is covered in 3.2.7.2).* |
| 3.2.3.6 | | Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering. | 3.2.13.5 | | The Entity ensures that all visitors and suppliers accessing the site and/or associated facilities:<br>a. Receive an OSH briefing;<br>b. Are provided with clean personal protective equipment, at no cost, that is relevant to the areas of the site or associated facilities that they will be entering; and<br>c. Receive instruction on proper use and fitting of personal protective equipment and the entity's expectations for when and where the equipment must be used. | *Expands on former 3.2.3.6* |
| ***3.2.6*** | | ***Health and Safety Data Management and Access to Information*** | ***3.2.14*** | | ***Record-Keeping and Data Management*** | |

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| 3.2.6.1 | | The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities and dangerous occurrences collected by the company and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, shall be available to workers' health and safety representatives. | 3.2.14.1 | | The Entity maintains the following records:<br>a. Workplace monitoring results , for at least 40 years or the period specified in the relevant regulations (if they exist) whichever is the highest;<br>b. Health surveillance results , for at least 40 years or the period specified in the relevant regulations (if they exist) whichever is the highest; and<br>c. All data on unwanted events collected by the company and all reports on unwanted events submitted to competent authorities, for at least 5 years after any given event. | *Adaptation of former 3.2.6.1 - constituent parts separated out into sub-requirements for clarity and timeframes added.* |
| 3.2.6.2 | | The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the heath data management system. | 3.2.14.2 | | The Entity has a data management system in place to enable worker health data to be readily located and retrieved. The system:<br>a. Is overseen by a responsible custodian;<br>b. Securely stores data that are protected by medical confidentiality; and<br>c. Retains data on workers for at least 40 years or the period specified in the relevant regulations (if they exist) whichever is the highest. | *Adaptation of former 3.2.6.2 - constituent parts separated out into sub-requirements for clarity and timeframes for data retention changed.* |
| | | | ***3.2.15*** | | ***Continuous Improvement*** | |
| 3.2.5.3 | | Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results. | 3.2.15.1 | | On an ongoing basis, the entity reviews inspections reports, workplace monitoring and health surveillance information, occurrences of stop work actions, hazards, accidents, near-miss incidents, injuries and fatalities. If performance criteria or indicators related to control measures are not being met, the Entity:<br>a. Collaborates with workers to carry out a root cause analysis, develop corrective actions and modify controls;<br>b. Revises the management plan and/or relevant procedures and training materials, accordingly; and<br>c. Includes the information in the annual occupational health and safety management review (see 3.2.15.2). | *Expands significantly on what constitutes "as necessary" from former 3.2.5.3, and outlines the expectations re: steps involved in update of OSH materials.*<br><br>*Note that in former 3.2.5.3 the act of systematically reviewing reports and monitoring information was implicit (necessary to identify when changes are needed); this requirement (3.2.15.1) makes the expectation explicit.*<br><br>*c. new sub-requirement*<br><br>*Note: also incorporates intent of guidance to former 3.2.1.1 ("Monitoring of OH&S performance using defined procedures to actively scrutinize compliance with the OH&S management system, and reactively reporting and investigating incidents and accidents to identify their root cause.").* |

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| | | | 3.2.15.2 | | On an annual basis, the member of the Entity's top management accountable for the OSH management system:<br>a. Reviews the site's OSH record for the year against the Entity's OSH objectives and key performance indicators and/or targets required in 3.2.1.2;<br>b. If the entity's OSH objectives and key performance indicators and/or targets required in 3.2.1.2 are not being achieved, it develops and documents changes to relevant policies, procedures, and systems, to improve performance, and shares this information with the top management team and the joint health and safety committee; and<br>c. It ensures those changes are implemented in a timely manner. | *New requirement; however, builds on intent of guidance to former 3.2.1.1 ("• Review of OH&S performance and making changes to the OH&S management system in line with findings, taking immediate corrective actions in line with the changes.").* |
| 3.2.5.3 | | Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results. | 3.2.15.3 | | To continuously improve the effectiveness and appropriateness of its OSH management systems, the Entity:<br>a. At least annually, but without undue delay after a significant change , reviews the hazard identification and OSH risk assessments, and updates them, if necessary, in accordance with Section 3.2.4;<br>b. At least every two years, but without undue delay after a significant change , reviews the on-site emergency preparedness and response plans, and updates them, if necessary, in accordance with Section 3.2.7; and<br>c. Regularly reviews the OSH training program and updates it in accordance with Section 3.2.13 when there are changes to procedures, risk assessments or management plans, or if evaluations of the Entity's performance suggest areas that need attention. | *Incorporates obligation to update risk assessments, management plans and other OSH materials as necessary based on monitoring and evaluation (in former 3.2.5.3), and the expectation that entities will systematize the updating of risk assessments (in former 3.2.2.4).* |
| 3.2.2.4. | | The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards. | | | | |
| | | | 3.2.15.4 | | To continuously improve the effectiveness and appropriateness of its measures to protect and promote health and wellbeing in the workplace, at least annually, but without undue delay after a significant change , the Entity:<br>a. Reviews the programs to support the mental health of workers, developed and implemented as per 3.2.5.5.b;<br>b. Reviews the programs to encourage and promote overall health and wellbeing in the workplace, developed and implemented as per 3.2.5.5.c; and<br>c. Updates these programs and/or the identification of psychosocial hazards, if necessary, in collaboration with workers and workers' health and safety representatives | *New requirement aligned with enhanced focus in the chapter on worker wellbeing (in addition to health and safety), including mental health.* |
| | | | ***3.2.16*** | | ***Information-Sharing and Public Reporting*** | |

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| | | | 3.2.16.1 | | At least annually, and with due regard for workers' safety and data privacy, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of, the following information, for the last reporting period:<br>a. Number of near-miss incidents, in total and disaggregated by employees and contractors;<br>b. Number of high potential incidents (HPI) , in total and disaggregated by employees and contractors;<br>c. Number of accidents, in total and disaggregated by employees and contractors;<br>d. Number of injuries, in total and disaggregated by employees and contractors;<br>e. Number of lost-time injuries, in total and disaggregated by employees and contractors;<br>f. Number of fatalities, in total and disaggregated by employees and contractors;<br>g. Number of incidents of occupational disease, in total and disaggregated by employees and contractors;<br>h. Number of incidents of occupational disease that led to lost time, in total and disaggregated by employees and contractors; and<br>i. Number of incidents of occupational disease that led to fatalities, in total and disaggregated by employees and contractors. | *New requirement; 2018 Standard only required that these data be collected and reported to OSH representatives, not made publicly available. HPI added as additional metric. See response to Consultation Question 3.2-12.* |
| | | | 3.2.16.2 | IRMA+ | At least annually, and with due regard for workers' safety and data privacy, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of a report on workplace accessibility that includes:<br>a. Total number of workers that have acquired a disability, disaggregated by employees and contractors;<br>b. Policies and specific actions related to employment and decent work of workers with disabilities ; and<br>c. Strategies and specific actions aimed at improving the accessibility of the Entity's site, facilities, products, services, and communications for workers with disabilities. | *New OPTIONAL requirement.* |
| 3.2.5.3 | | Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results. | | | | *Deleted - expectation that OSH documents and plans will be updated now integrated into other requirements.* |

# Chapter 3.3 Community Health and Safety

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **3.3** | | **Community Health and Safety** | **3.3** | | **Community Health and Safety** | |
| ***3.3.1*** | | ***Scoping of Risks to Community Health and Safety*** | ***3.3.1*** | | ***Scoping and Baseline Data*** | |
| 3.3.1.1 | Critical | The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:<br><br>a. General mining operations;<br><br>b. Operation of mine-related equipment or vehicles on public roads;<br><br>c. Operational accidents;<br><br>d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);<br><br>e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);<br><br>f. Mining-related effects on community demographics, including in-migration of mine workers and others;<br><br>g. Mining-related impacts on availability of services;<br><br>h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and<br><br>i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project. | 3.3.1.1 | Critical | 3.3.1.1 Critical Requirement<br>Building on relevant baseline data, a scoping process (or equivalent) is undertaken and documented by competent professionals, at the level of the site, to identify all the sources of risks and impacts to community health and safety from the project/operation and associated facilities, as follows:<br>a. The process includes a comprehensive review of all the potential sources of risks and impacts listed in Annex 3.3-A, to determine those that are applicable and likely to occur at the different stages of the proposed project/modification life cycle, from exploration and pre-construction through concurrent reclamation, decommissioning, closure, and post-closure, where applicable;<br>b. It identifies whether those identified risks and impacts are likely to occur under normal operating conditions and/or from potential operational accidents and unwanted event ;<br>c. It identifies whether past unremediated impacts are still occurring; and<br>d. It is informed by consultations with affected rights-holders and stakeholders, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and/or marginalized people , and by consultations with other relevant stakeholders . | *Incorporates content from former 3.3.1.1 - the details of the types of risks to be scoped have been moved into Annex 3.3-A.*<br><br>*b. and c. from former 3.3.1.2.*<br><br>*d. incorporates intent of former 3.3.5.1* |
| 3.3.1.2 | | Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure). | | | | |
| ***3.3.5*** | | ***Stakeholder Engagement*** | | | | |

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| 3.3.5.1 | | The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in:<br><br>a. Scoping of community health and safety risks and impacts related to mining;<br><br>b. Assessment of significant community health and safety risks and impacts related to mining;<br><br>c. Development of prevention or mitigation strategies;<br><br>d. Collection of any data needed to inform the health risk and impact assessment process; and<br><br>e. Design and implementation of community health and safety monitoring programs. | | | | |
| | | | 3.3.1.2 | | If baseline data on social-economic conditions were not previously collected at an appropriate level of detail to allow the assessment of the risks to community health and safety, additional baseline data are collected and documented by competent professionals to estimate, to the extent possible, the baseline conditions prior to development of the project/operation. | *New requirement* |
| ***3.3.2*** | | ***Risk and Impact Assessment*** | ***3.3.2*** | | ***Risk and Impact Assessment*** | |
| 3.3.2.1 | | The operating company shall carry out an assessment of risks and impacts to:<br><br>a. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping;<br><br>b. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable. | 3.3.2.1 | | 3.3.2.1 Building on the scoping requirement 3.3.1, and on any additional baseline data collected as per 3.3.1.2, a risk and impact assessment (or equivalent) is carried out and documented by competent professionals, as follows: in collaboration with affected people and relevant stakeholders. This risk and impact assessment :<br>a. It evaluates the nature, level and duration of risk posed to, and the nature, magnitude and duration of potential impact, and any unremediated past impact, on community health and safety;<br>b. It includes differential risks and impacts on different groups of stakeholders and rights-holders ; and<br>c. It identifies the risks and impacts that are of greatest concern or significance to affected people.<br>d. It is carried out in collaboration with affected rights-holders and stakeholders, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and/or marginalized people , and with other relevant stakeholders . | *Builds primarily on former 3.3.2.1*<br><br>*b. incorporates intent of former 3.3.1.3 (to ensure differential risks are understood - formerly applied at scoping point, now during risk assessment)*<br><br>*d. is new* |
| 3.3.1.3 | | Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities. | | | | |
| ***3.3.3*** | | ***Risk and Impact Management and Mitigation*** | ***3.3.3*** | | ***Management Plan*** | |

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| 3.3.3.1 | | The operating company shall document and implement a community health and safety risk management plan that includes:<br><br>a. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and<br><br>b. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective. | 3.3.3.1 | | Building on 3.3.2, a community health and safety management plan (or equivalent) is developed and documented by competent professionals, as follows:<br>a. The development of the plan is informed by consultations with affected rights-holders and stakeholders, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and/or marginalized people;<br>b. It outlines specific measures that strictly align with the mitigation hierarchy to prioritize avoidance or prevention of impacts on community health and safety ;<br>c. It includes appropriate qualitative and quantitative performance indicators (including gender-disaggregated indicators where appropriate), that have been agreed upon with affected rights-holders and stakeholders, to enable evaluation of the effectiveness of mitigation measures over time;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigned responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for the affected communities;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *Incorporates content from former 3.3.3.1 and 3.3.3.2.*<br><br>*a. and c. are new sub-requirements, aligned with Standard-wide changes to expectations re: substantive stakeholder engagement*<br><br>*b. is from former 3.3.3.2*<br><br>*d. to h are new: aligned with Standard-wide changes to expectations re: resourcing and implementation of management plans and Plan-Do-Check-Act approach.* |
| 3.3.3.2 | | Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation. | | | | |
| ***3.3.4*** | | ***Specific Provisions Related to HIV/AIDS, Tuberculosis, Malaria and Emerging Infectious Diseases*** | | | | |

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| 3.3.4.1 | | If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:<br><br>a. In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining;<br><br>b. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and<br><br>c. Make information publicly available on its infectious disease mitigation program. | 3.3.3.2 | | If the risk and impact assessment required in 3.3.2, or any other credible information, indicates a significant risk of community exposure to any infectious disease such as SARS-CoV-2 (Covid-19), HIV/AIDS, tuberculosis, malaria or other, due to transmission between the ENTITY's workers and members of affected communities:<br>a. Business practices and targeted initiatives are developed by competent professionals in accordance with Annex 3.3-B, and incorporated into the community health and safety management plan;<br>b. The Entity supports the creation and funding of initiatives, in partnership with public health agencies, workers' organizations and other relevant stakeholders, to educate affected communities, and groups potentially disproportionately exposed to risks and impacts , on the infectious disease and modes of prevention, and to support efforts to achieve universal access to testing, vaccinations and treatment for affected community members and dependents of workers;<br>c. The Entity proactively offers to share best practices on the prevention and treatment of these diseases with civil society organizations and policymakers that are active in the area of influence;<br>d. The Entity makes and maintains publicly accessible information about its efforts to prevent and address infectious diseases. | *Builds on former 3.3.4.1; clarifies that actions taken must be incorporated into the overall management plan.*<br><br>*The content of former 3.3.4.2 has been fully integrated into Chapter 3.2 on Occupational Safety, Health and Wellbeing as most elements were related to workers (employees and contractors)* |

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| 3.3.4.2 | | If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:<br><br>a. In relation to HIV/AIDS, the operating company shall, at minimum:<br>i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;<br>ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate;<br>iii. Provide access for contractors to education and other preventative programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and<br>iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members.<br><br>b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.<br><br>c. In relation to malaria, the operating company shall, at minimum:<br>i. Develop a vector control plan;<br>ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and<br>iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing. | | | | |
| | | | ***3.3.4*** | | ***Monitoring and Evaluation*** | |
| | | | 3.3.4.1 | | To monitor and evaluate the effectiveness and appropriateness of its community health and safety management plan, at least annually, the ENTITY:<br>a. Tracks and documents its performance, over successive time periods, against the criteria and indicators defined and validated in 3.3.3.1;<br>b. Tracks and documents how the measures and actions developed and implemented as per 3.3.3 are effectively preventing actual impacts to community health and safety, and where prevention is not possible or not immediately possible, providing timely and adequate remediation to affected people; and<br>c. Disaggregates the data according to gender-indicators where appropriate. | *New requirement - aligned with Standard-wide changes to expectations re: M&E of management plans and Plan-Do-Check-Act approach.* |

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| | | | 3.3.4.2 | | The monitoring and evaluation process:<br>a. Encourages and facilitates joint tracking or joint fact-finding with affected communities, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and marginalized people, as per Chapter 1.2;<br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected communities; and<br>c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of rights holders. | *New requirement - aligned with Standard-wide changes to expectations re: M&E of management plans and Plan-Do-Check-Act approach.* |
| | | | 3.3.4.3 | IRMA+ | If significant risks or impacts to health from exposure to airborne emissions in the sites' area of influence are identified, the ENTITY collaborates with affected communities and relevant stakeholders, to develop and implement a program to monitor exposure levels and perform health surveillance of affected people, as follows:<br>a. Exposure monitoring and health surveillance are designed and conducted by a specialist in community health, or other competent professional, selected in collaboration with community representatives;<br>b. Health surveillance is carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to interests of the community member/s;<br>c. Samples collected for monitoring and health surveillance purposes are analyzed in an ISO/IEC 17025-certified or nationally-accredited laboratory, to the extent available in the country of operation;<br>d. Sample results are compared against national or international standards;<br>e. If a sample present levels that exceed national or international standards, the affected community member/s are informed immediately, and mitigation measures are reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits; and<br>f. This monitoring program is reviewed and regularly updated, if necessary, in accordance with 3.3.5.1. | *New OPTIONAL requirement.* |
| | | | ***3.3.5*** | | ***Continuous Improvement*** | |

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| | | | 3.3.5.1 | | At least annually, but without undue delay after a significant change, the ENTITY collaborates with affected communities to:<br>a. Review the monitoring and evaluation results, informed by internal and external feedback, as per Section 3.3.4;<br>b. Review any community health-and-safety-related grievances (see Section 1.6.4);<br>c. Review the ENTITY's effectiveness in preventing and remediating actual community health and safety impacts as per 3.3.3, informed by the monitoring and evaluation required in 3.3.4.1 and 3.3.4.2;<br>d. Develop and implement time-bound corrective measures to update, if necessary , the scoping and any additional baseline data, in accordance with Sections 3.3.1;<br>e. Develop and implement time-bound corrective measures to update, if necessary , the risk and impact assessment, in accordance with Sections 3.3.2;<br>f. Develop and implement time-bound corrective measures to update, if necessary , its community health and safety management plan in accordance with Section 3.3.3; and<br>g. Develop and implement time-bound corrective measures to update, if necessary , its monitoring and evaluation processes in accordance with Section 3.3.4. | *New requirement - aligned with Standard-wide Plan-Do-Check-Act approach.* |
| ***3.3.6*** | | ***Reporting*** | ***3.3.6*** | | ***Information-Sharing and Public Reporting*** | |
| 3.3.6.1 | | The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available. | 3.3.6.1 | | At least annually, and with due regard for people's safety, data privacy, and for security concerns, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. Its assessment of risks and impacts on community health and safety, including an explanation of the assessment methodology and a list of the risks and impacts identified (see Section 3.3.2);<br>b. The qualitative and quantitative indicators used to monitor and evaluate the effectiveness and appropriateness of its community health and safety management plan (defined and validated in 3.3.3.1);<br>c. Key findings of the monitoring and evaluation process required in 3.3.4, and of the review process required in 3.3.5.1; and<br>d. A list of the time-bound corrective measures identified as per 3.3.5.1. | *Expands significantly on reporting expectations in former 3.3.6.1 (specifying what 'information' should be shared specifically).* |

# Chapter 3.4 Security Forces

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **3.5** | | **Security Arrangements** | **3.4** | | **Security Forces** | |
| ***3.5.1*** | | ***Policies and Commitments Related to Security and Human Rights*** | ***3.4.1*** | | ***Formalized Policy*** | |
| 3.5.1.1 | | The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force. | 3.4.1.1 | | The ENTITY has a formal policy in place that:<br>a. Commits to integrate the respect of all internationally recognized human rights in its efforts to maintain the security of the site, associated facilities and transport routes ;<br>b. Commits to avoid hiring security personnel and using private or public security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force ;<br>c. Sets clear expectations for how employees, contractors, and other relevant parties linked to the site and its associated facilities shall respect these commitments (a. and b.); and<br>d. Is approved at the top management level of the ENTITY;<br>e. Is proactively communicated to employees, contractors, and other relevant parties linked to the site and its associated facilities;<br>f. Is publicly accessible; and<br>g. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the site. | *Expands upon former 3.5.1.1 - reference to transport routes incorporates intent of former 3.5.1.3.b.*<br><br>*c. is a new sub-requirement*<br><br>*d, e, and g. are new subrequirements aligned with Standard-wide changes to expectations re: resourcing of policies* |
| 3.5.1.3 | | If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:<br><br>a. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms;<br><br>b. Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and<br><br>c. Outlines required training for security personnel. | | | | |
| ***3.5.2*** | | ***Security Risk Assessment and Management*** | ***3.4.2*** | | ***Risk and Impact Assessment*** | |
| 3.5.2.1 | | The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment. | 3.4.2.1 | | A risk and impact assessment (or equivalent) is carried out and documented by competent professionals to identify and assess potential adverse human rights, social, or safety impacts (hereafter referred to as 'risks') and actual adverse impacts that may arise from the site's security context and the ENTITY's security management and arrangements, as follows:<br>a. This assessment follows a credible methodology, and the methodology used is documented ;<br>b. This assessment includes an analysis of the political and security context in the country of operation ;<br>c. It is informed by credible information obtained from a range of perspectives, including affected rights-holders and stakeholders, as well as other relevant stakeholders such as Rights Defenders, and expert advice ;<br>d. It assesses risks and impacts associated with the site's security context and the ENTITY's management and use of private security personnel and the use or deployment of public security forces (hereafter referred to collectively as 'security-related risks and impacts' on affected people and communities , including differential risks and impacts on different categories of stakeholders and | *a. adapted from former 3.5.2.2.a*<br>*b. from former 3.5.2.3.b*<br>*c. former 3.5.2.2.c*<br><br>*d. to f. expand upon former 3.5.2.3.a, separating out various stakeholder groups included in former reference to "the company, workers, and communities" for enhanced clarity.* |
| 3.5.2.2 | | Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall:<br><br>a. Follow a credible process/methodology;<br><br>b. Be carried out and documented by competent professionals; and<br><br>c. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice | | | | |

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| 3.5.2.3 | | The scope of the security risk assessment shall include, but need not be limited to:<br><br>a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups;<br><br>b. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption);<br><br>c. Analysis of current and potential conflicts or violence in the host country and affected communities; and<br><br>d. Risks associated with equipment transfers. | | | rights-holders ;<br>e. It assesses security-related risks and impacts on workers and visitors, including differential risks and impacts of different categories of workers ; and<br>f. It assesses security-related risks and impacts on the site and its associated facilities . | |
| | | | 3.4.2.3 | | If the suspected or confirmed presence of conflicts or high risks in the site's area of influence has been identified as per Chapter 1.3, the risk and impact assessment integrates the findings and recommendations of the Heightened Risk and Impact Assessment required in Chapter 1.5. | *New requirement in this chapter, but the effort covered with the expectation is covered elsewhere (Chapter 1.3, Chapter 1.5).* |
| | | | ***3.4.3*** | | ***Management Plans and Procedures*** | |

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| 3.5.2.4 | | The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective. | 3.4.3.1 | | Building on 3.4.2 and other relevant sources of information , a security management plan (or equivalent) is developed and documented by competent professionals, to prevent, mitigate and remedy all identified risks and impacts related to the site's security context and the ENTITY's management and use of private security personnel and public security forces, as follows:<br>a. This plan outlines specific measures, that strictly align with the mitigation hierarchy, to prevent and, where prevention is not possible or not immediately possible, to mitigate and remedy all the potential risks and actual adverse impacts identified;<br>b. Where it is necessary to prioritize measures to address actual and potential adverse impacts, it first seeks to prevent and mitigate those that are most severe or where delayed response would make them irremediable ;<br>c. It includes qualitative and quantitative performance indicators (including gender-disaggregated indicators and other categories of disaggregated indicators where appropriate), linked to adequate baseline data, to enable monitoring and evaluation of the effectiveness of measures over time;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for affected rights-holders and stakeholders;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *Expands upon former 3.5.2.4*<br><br>*d. to h. are new to align with Standard-wide changes to expectations re. resourcing and implementation of management plans.* |
| 3.5.2.5 | | If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform with requirements in IRMA Chapter 1.3. | 3.4.3.2 | | If the risk and impact assessment required in 3.4.2, or any other credible information, reveals the potential for conflicts, or actual conflicts between the ENTITY's private security personnel and affected communities or workers, the security management plan also includes:<br>a. Specific mitigation strategies to address potential and/or actual conflicts, developed in collaboration with communities and/or workers;<br>b. Inclusive collaboration with communities and/or workers to take into consideration the needs of different genders, ages, and ethnicities, and any potentially underserved and/or marginalized people, in accordance with Chapter 1.2; and<br>c. If specific risks or impacts to human rights are identified in the assessment, mitigation strategies conform with the relevant requirements of Chapter 1.3 . | *Expands upon former 3.5.2.5, separating out the various components for enhanced clarity.* |

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| 3.5.1.2 | Critical | The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:<br><br>a. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;<br><br>b. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and<br><br>c. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. | 3.4.3.3 | Critical | The ENTITY has procedures in place regarding the use of force and firearms that require that the Entity's own personnel and private security forces used/deployed for the security of the site, associated facilities, and transport routes:<br>a. Take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force;<br>b. If force is used, it does not exceed what is strictly necessary, it is proportionate to the threat and appropriate to the situation, and it is systematically investigated and reported; and<br>c. Are unarmed unless the risk analysis prescribes such a need, and firearms are only used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. | *Adaptation of former critical requirement 3.5.1.2. Removed reference to UN Basic Principles on the Use of Force and Firearms to provide clarity for auditing purposes.* |
| 3.5.6.3 | | Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security. | 3.4.3.4 | | Affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, have access to a grievance mechanism to raise, and seek resolution or remedy for, complaints and grievances specifically related to the ENTITY's security management and arrangements, as follows:<br>a. A grievance mechanism through which affected rights-holders and stakeholders, including Rights Defenders and civil society organizations, can raise, and seek resolution or remedy for, complaints and grievances specifically related to the ENTITY's security management and arrangements, is in place ;<br>b. This grievance mechanism is rights-compatible ;<br>c. Affected rights-holders and stakeholders have been informed about the existence and functioning of this grievance mechanism, as well as of other relevant mechanisms ;<br>d. If the operational-level grievance mechanism developed as per Chapter 1.6 (Complaints and Grievance Mechanism and Access to Remedy) is used as the mechanism to receive complaints and grievance specifically related to the ENTITY's security management and arrangements, the Entity fully meets all requirements in Chapter 1.6; and<br>e. If a separate mechanism is created to handle only complaints and grievances related to human rights, it is established and managed in a manner that fully meets all requirements in Chapter 1.6. | *Former 3.5.6.3*<br><br>*Cross-reference to Chapter 1.6 is new (response to consultation question 1.4-02)* |
| ***3.5.3*** | | ***Due Diligence Prior to Hiring Security Personnel*** | ***3.4.4*** | | ***Selection and Vetting of Security Personnel*** | |

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| 3.5.3.1 | | The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force. | 3.4.4.1 | | The ENTITY has a system in place for the selection and vetting of private security personnel to ensure that the ENTITY:<br>a. Develops a selection protocol (for employees) that lays out clear terms on exclusion criteria , and develops a request for proposals (for private security providers) that lays out clear terms on exclusion criteria , award criteria, needed personnel and required weapons and equipment, and that requires each applicant to provide background information;<br>b. Evaluates applications and bids according to the requirements laid out in the selection protocol or request for proposals, and conducts comprehensive due diligence on the selected individuals and provider/s; and<br>c. Ensure the selected private security providers have effective vetting programs in place too, and encourages them to sign a formal declaration that none of their employees have been implicated in abuses of human rights and/or violations of international humanitarian law and/or the use of excessive force. | *Expands significantly on intent of former 3.5.3.1, adding details as to the particular steps that should be involved in the due diligence of security providers.* |
| 3.5.3.2. | | The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force | 3.4.4.2 | | THe ENTITY has a system in place for the vetting of public security forces deployed to provide security to the site, associated facilities and/or transport routes to ensure that the ENTITY, to the extent possible:<br>a. Maintains communication and working relationships, commensurate with the level risks and impacts associated with public security forces, with different echelons of public security forces and actively seek opportunities to discuss vetting procedures;<br>b. In collaboration with the relevant government authorities, identifies which institutions should be consulted in order to conduct background checks;<br>c. Uses multiple sources to obtain relevant information; and<br>d. Establishes procedures to help ensure that individuals who have been convicted of, or credibly implicated in, the infringement of human rights, breaches of international humanitarian law, or the use of excessive force, do not provide security services for the ENTITY. | *Expands significantly on intent of former 3.5.3.1 to increase robustness of due diligence of public security forces in alignment with expectations for private security forces (per 3.4.4.1 above). Adds reference to international best practice guidelines formerly referred to in guidance and former 3.5.1.3.* |
| | | | ***3.4.5*** | | ***Arrangements with Private and Public Security Forces*** | |

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| 3.5.1.3 | | If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:<br><br>a. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms;<br><br>b. Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and<br><br>c. Outlines required training for security personnel. | 3.4.5.1 | | 3.4.5.1 If private security is used to provide security to the site, associated facilities, and/or transport routes, the ENTITY has signed contract/s with each private security provider that:<br>a. Sets out the following agreed-on principles: 1) Private security must act consistently with the law and international guidelines; 2) Private security must respect the Entity's procedures regarding the use of force and firearms required in 3.4.3.3; 3) Allegations of human rights abuses will be investigated and monitored; 4) Only preventative and defensive services are to be provided; 5) Individuals implicated in human rights abuses are not permitted to provide security services to the Entity; and 6) Private security must investigate and report to the ENTITY incidents where physical force is used;<br>b. Delineates respective duties and obligations with respect to the provision of security in and around the site and associated facilities and, if relevant, along transport routes, and with respect to the reporting of any security-related incidents;<br>c. Requires the private security provider to ensure its personnel are trained to respect the rights of the workers and local community members, and outlines the content and frequency or the required training;<br>d. Stipulates how the ENTITY monitors the conduct of private security personnel and holds them accountable;<br>e. Stipulates termination of relationship between the ENTITY and the private security provider where there is credible evidence of unlawful or abusive behavior by the latter; and<br>f. Stipulates how the ENTITY engages with national judicial authorities for crimes or human rights violations by private security personnel. | *Expands on the the former 3.5.1.3. In particular, 3.4.5.1.a now outlines specific provisions from the Voluntary Principles on Security and Human Rights that need to be in contracts, so that there are clear expectations for what will be audited.*<br><br>*3.4.5.1. adds that there also be clear reporting obligatios in the event that there are security incidents.*<br><br>*d. to f. are new to add additional best practices* |
| 3.5.1.4 | | If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or similar agreement with public security providers that includes similar provisions to those in 3.5.1.3. | 3.4.5.2 | | If public security forces are used/deployed to provide security to the site, associated facilities, and/or transport routes, the ENTITY makes a good faith effort to sign a Memorandum of Understanding or similar agreement with each public security provider that includes similar provisions to those in 3.4.5.1. | *Former 3.5.1.4* |
| ***3.5.4*** | | ***Training*** | ***3.4.6*** | | ***Training of Security Personnel*** | |
| 3.5.4.1 | | Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with particular reference to vulnerable groups, and the company's policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers. | 3.4.6.1 | | The entity ensures that initial training prior to deployment, and refresher courses:<br>a. Are mandatory for all private security personnel ;<br>b. Include information related to ethical conduct, and respect for the rights of workers, Indigenous rights-holders (if applicable), and affected communities, with specific reference to groups and individuals disproportionately affected by human rights violations ;<br>c. Include first-aid provision, conflict management and dealing with incidents and disturbances ; and<br>d. Include the ENTITY's procedures on the appropriate use of force and firearms required in 3.4.3.3. | *Adaptation of former 3.5.4.1.*<br><br>*c. new sub-requirement* |

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| 3.5.4.2 | | If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security. | 3.4.6.2 | | If public security forces are to be used/deployed, the ENTITY has a system to:<br>a. Determine whether public security personnel are provided with effective training on, and have accurate understanding of, all the topics listed in 3.4.6.1;<br>b. Where gaps in training and/or understanding are identified, the ENTITY offers to facilitate initial training and refresher courses for public security personnel that are used/deployed to provide security to the site, associated facilities, and/or transport routes; and<br>c. Support any existing relevant training programs, and any current or potential future technical assistance programs being offered by donors/home country governments if applicable. | *Adaptation of former 3.5.4.2.*<br><br>*c. new sub-requirement* |
| 3.5.5 | | Management of Security Incidents | 3.4.7 | | Response to Security Incidents | |
| 3.5.5.1 | | The operating company shall:<br><br>a. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force;<br><br>b. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company's policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies;<br><br>c. Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers;<br><br>d. Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings;<br><br>e. Provide medical assistance to all injured persons, including offenders; and<br><br>f. Ensure the safety of victims and those filing security-related allegations. | 3.4.7.1 | Critical | The ENTITY has a system in place to investigate and respond to security incidents, as follows:<br>a. Investigation of, and response to, security incidents occur in accordance with all relevant terms of the security arrangements required in 3.4.5;<br>b. The ENTITY documents and investigates all use of force and security incidents, including those involving impacts on human rights or the inappropriate use of force ;<br>c. The ENTITY takes appropriate measures to prevent , and where prevention is not possible or not immediately possible, mitigate and provide remediation for human rights impacts (as per Chapter 1.3), injuries, or fatalities caused by private security personnel and/or public security forces (in accordance with Section 3.4.3); and<br>d. The ENTITY takes appropriate measures, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel, and acts that contravene the ENTITY's security arrangements and procedures on the use of force and firearms and/or its human rights policies and other relevant policies. | *a. cross-references the arrangements made in 3.4.5*<br>*b. from former 3.5.5.1.a*<br>*c. from former 3.5.5.1.c*<br>*d. from former 3.5.5.1.b* |
| | | | 3.4.7.2 | | 3.4.7.2 If an actual security incident occurs (or has occurred), the ENTITY:<br>a. Documents and investigate the incident, and take the appropriate measures required in 3.4.7.1;<br>b. Provides medical assistance to all injured people, including offenders, and ensures the safety of victims and those filing security-related allegations;<br>c. Reports the incident, including any credible allegations of human rights abuses by private or public security providers, to competent authorities and national human rights institutions; and<br>d. Cooperates in any investigations or proceedings led by relevant authorities or human rights institutions. | *a. incorporates intent of former 3.5.5.1.a,b, and c.*<br>*b. from former 3.5.5.1.e*<br>*c and d. from former 3.5.5.1.d* |

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| 3.5.5.2 | | In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents. | 3.4.7.3 | | Besides the measures required in 3.4.7.2 for all security incidents, in the event of security-related incidents that result in injuries, fatalities, or alleged human rights impacts, the ENTITY:<br>a. Provides affected communities and/or workers with information on the incidents and any investigations that are underway;<br>b. Collaborates with the people affected, and their advisors if applicable, to develop and agree on qualitative and quantitative indicators to track the effectiveness of responses; and<br>c. Collaborates with the people affected, and their advisors if applicable, to conduct lessons-learned exercises, and develop and implement strategies to prevent the recurrence of similar incidents. | *Adaptation of former 3.5.5.2 b. new sub-requirement* |
| | | | 3.4.7.4 | IRMA+ | Besides the collaboration required in 3.4.7.3.c, the ENTITY seeks to collaborate with other relevant stakeholders including civil society, human rights experts, security providers, representatives of the country of operation's government, and other companies to share lessons learned and address challenges in the management of security risks and impacts. | *New OPTIONAL requirement.* |
| ***3.5.6*** | | ***Communication and Disclosure*** | ***3.4.8*** | | ***Meaningful Engagement with Stakeholders*** | |
| 3.5.6.2 | | The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights. | 3.4.8.1 | | The ENTITY engages with affected rights-holders and stakeholders on security issues as follows:<br>a. Engagement occur in a manner that is inclusive of different genders, ages, and ethnicities and any potentially underserved and/or marginalized people;<br>b. Stakeholders, including country of operation's government/authorities and affected rights-holders and stakeholders, are consulted about the impact of the ENTITY's security management and arrangements on those stakeholders;<br>c. The consultations occur at a frequency commensurate with the risks associated with the site's security context and the ENTITY's security management and arrangements, as identified per 3.4.2 and updated per 3.4.10 ; and<br>d. The policy required in 3.4.1 is proactively shared with relevant stakeholders ; and<br>e. Affected rights-holders and stakeholders are regularly offered a briefing on the ENTITY's procedures on the use of force and firearms required in 3.4.3.3. | *a. b. and c. are adapted from former 3.5.6.2 (consultations with stakeholders on impacts), with added specificity concerning timing of consultations in c.*<br><br>*d. is adapted from former 3.5.1.1 (public policy)*<br><br>*e. is adapted from former 3.5.6.1 (briefing of community members)* |
| 3.5.1.1 | | The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force. | | | | |
| 3.5.6.1 | | If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms. | | | | |
| | | | ***3.4.9*** | | ***Monitoring and Evaluation*** | |
| | | | 3.4.9.1 | | To monitor and evaluate the effectiveness and appropriateness of its security management and arrangements, at least annually, the ENTITY:<br>a. Tracks and documents its performance, over successive time periods, against the criteria and indicators defined in 3.4.3.1 in 3.4.7.3;<br>b. Tracks and documents how the measures and actions developed and implemented as per 3.4.3, 3.4.4, 3.4.5, 3.4.6, and 3.4.7 are effectively preventing actual security incidents and adverse impacts, and where prevention was not possible or immediately possible, providing timely and adequate remediation to victims and affected people; and<br>c. Disaggregates the data according to gender-indicators where appropriate. | *New requirement aligned with Standard-wide changes to expectations re: M&E and Plan-Do-Check-Act approach.* |
| | | | 3.4.9.2 | | The monitoring and evaluation process:<br>a. Encourages and facilitates joint tracking or joint fact-finding with affected communities and workers, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and marginalized people, as per | *New requirement aligned with Standard-wide changes to expectations re: M&E and Plan-Do-Check-Act approach.* |

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| | | | | | Chapter 1.2;<br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected communities and workers; and<br>c. Includes safeguards to protect the security and privacy of collected personal data or characteristics of people. | |
| | | | ***3.4.10*** | | ***Continuous Improvement*** | |
| | | | 3.4.10.1 | | At least annually, but without undue delay after a significant change, the ENTITY:<br>a. Reviews the monitoring and evaluation results, informed by internal and external feedback, as per Section 3.4.9;<br>b. Reviews any security-related grievances and the functioning of the relevant grievance mechanism/s required in 3.4.3.4 (see also Section 1.6.4);<br>c. Reviews its effectiveness in preventing, responding to, and remediating, actual security incidents, including those involving impacts on human rights or the inappropriate use of force, informed by the monitoring and evaluation required in 3.4.9.1 and 3.4.9.2;<br>d. Develops and implements time-bound corrective measures to update, if necessary , the risk and impact assessment in accordance with Section 3.4.2;<br>e. Develops and implements time-bound corrective measures to update, if necessary , the security management plan and procedures in accordance with Sections 3.4.3 to 3.4.8; and<br>f. Develops and implements time-bound corrective measures to update, if necessary , its monitoring and evaluation processes in accordance with Section 3.4.9. | *New requirement aligned with Standard-wide changes to expectations re: M&E and Plan-Do-Check-Act approach.* |
| | | | ***3.4.11*** | | ***Information-Sharing and Public Reporting*** | |
| 3.5.6.2 | | The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights. | 3.4.11.1 | | At least annually, and with due regard for rights holders safety, data privacy, and for security concerns, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of :<br>a. Key findings of the monitoring and evaluation process required in 3.4.9, and of the review process required in 3.4.10.1;<br>b. A summary of the measures and actions developed and implemented as per 3.4.3, 3.4.4, 3.4.5, 3.4.6, and 3.4.7, and the extent to which they effectively prevented actual security incidents and adverse impacts, and where prevention was not possible or immediately possible, provided timely and adequate remediation to victims and affected people; and<br>c. A list of the time-bound corrective actions identified as per 3.4.10.1. | *Expands upon former 3.5.6.2 (adding detail to the reference to reporting on "the company's security arrangements and its efforts to manage security").* |
| 3.5.6.4 | | If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns. | 3.4.11.2 | | If public security forces are providing security for any aspect of the operation, the ENTITY encourages the country of operation's government/authorities to make (or allow the ENTITY to make) details about their security arrangements transparent and accessible to the public, subject to any overriding safety and security concerns . | *Adaptation of former 3.5.6.4.* |

# Chapter 3.5 Artisanal and Small-Scale Mining (ASM)

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **3.6** | | **Artisanal and Small-Scale Mining** | **3.5** | | **Artisanal and Small-Scale Mining** | |
| ***3.6.1*** | | ***Understand the ASM Context*** | ***3.5.1*** | | ***Scoping*** | |
| 3.6.1.1 | | When the large-scale mining (LSM) operating company has identified the presence of artisanal and small-scale mining (ASM) entities on the LSM concession or in close proximity to LSM operations, the operating company shall carry out a scoping process to understand the legal, social and environmental context in which ASM activities are occurring. | 3.5.1.1 | | Building on 1.2.1.2, a scoping process is undertaken and documented by competent professionals to understand the legal, social, and environmental context in which ASM activities are occurring in the project/operation's area of influence. | *Former 3.6.1.1* |
| ***3.6.2*** | | ***Engage with ASM Entities and Communities*** | ***3.5.2*** | | ***Meaningful Engagement with ASM Entities and Communities*** | |
| 3.6.2.1 | | When the operating company has identified the presence of ASM on or in close proximity to its mining project, and where there is no material risk to company personnel, it shall:<br><br>a. Make a good faith effort to engage with ASM entities including, where relevant, informal ASM operators and formal ASM associations, as part of ongoing stakeholder engagement efforts (See IRMA Chapter 1.2);<br><br>b. Make a good faith effort to consult with informal and formal ASM entities during relevant risk and impact assessments and closure planning;<br><br>c. Engage with communities that are or may be affected by ASM operations and/or interactions between LSM and ASM entities; and<br><br>d. Inform ASM entities and communities that there is an operational-level grievance mechanism available to raise concerns and resolve conflicts related to the LSM operation (See IRMA Chapter 1.4). | 3.5.2.1 | Critical | Critical Requirement<br>The ENTITY can demonstrate that a good faith effort is made to :<br>a. 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);<br>b. 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);<br>c. Engage with communities that are or may be affected by ASM activities or by interactions between the ENTITY and ASM activities; and<br>d. 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). | *Former 3.6.2.1.a-c.*<br><br>*d. is former 3.6.2.1.d* |
| ***3.6.3*** | | ***Foster Positive Relationships and Opportunities for ASM and Communities*** | 3.5.3 | | ***Foster Positive Relationships and Opportunities*** | |

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| 3.6.3.1 | | The operating company shall ensure that mine security personnel are trained in respecting the human rights of individuals engaged in ASM activities, and members of affected communities. | 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:<br>a. 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);<br>b. Includes specific support measures to improve the safety of ASM activities;<br>c. Includes specific support measures to mitigate the adverse environmental and social impacts of ASM activities, and to maximize their positive impacts;d. Includes relevant performance indicators to evaluate the effectiveness of the Entity's engagement, training, and support measures;<br>e. Is developed in collaboration with ASM entities and communities to the extent possible. | *Incorporates former 3.6.3.1 and 3.6.3.2.*<br><br>*d. new sub-requirement to facilitate M&E per Plan-Do-Check-Act approach standard-wide.*<br><br>*e. si new* |
| 3.6.3.2 | | The operating company shall demonstrate that it has considered opportunities to enhance positive safety, environmental and social impacts of ASM activities for the benefit of ASM entities and host communities. | | | | |
| | | | 3.5.3.2 | IRMA+ | *The plan also includes the following specific support and knowledge transfer measures:*<br>*a. Sharing of geological information;*<br>*b. Skills and knowledge transfer on responsible closure and reclamation of mining areas (see Chapter 2.7); and*<br>*c. Financial support to carry out independent assessment of the human rights, environmental, social, and governance performance of ASM activities; and*<br>*d. Financial support to obtain third-party certification or assurance on the human rights, environmental, social, and governance performance of ASM activities;* | *New OPTIONAL requirement.* |
| | | | ***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:<br>a. Tracks and documents the implementation progress and effectiveness of its engagement activities with ASM entities and communities, over successive time periods, against relevant criteria and indicators;<br>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 relevant criteria and indicators; and<br>c. Disaggregates the data according to gender-specific indicators, where appropriate. | *New requirement - aligned with Plan-Do-Check-Act approach standard-wide.* |
| | | | ***3.5.5.*** | | ***Continuous Improvement*** | |

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| | | | 3.5.5.1 | | At least annually, but without undue delay after a significant change, the ENTITY:<br>a. Reviews the monitoring and evaluation results, and any ASM-related grievances (see Section 1.6.3);<br>b. Reviews its effectiveness in supporting ASM entities and communities to improve the safety of ASM activities;<br>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;<br>d. Develops and implements time-bound corrective measures to update, if necessary , its engagement, training, and support activities related to ASM entities and communities, in accordance with Sections 3.5.2 and 3.5.3. | *New requirement - aligned with Plan-Do-Check-Act approach standard-wide.* |
| ***3.6.4*** | | ***Perform Due Diligence in Commercial Relationships with ASM*** | | | | |
| 3.6.4.1 | | When the LSM mine sources minerals from or has other commercial relationships with ASM entities, the operating company shall:<br><br>a. Regularly assess the social and environmental risks and impacts related to the ASM entities with whom they have a commercial relationship;<br><br>b. Collaborate with those ASM entities with whom it can legally and legitimately engage to develop and implement a plan to eliminate or mitigate the most significant risks, and over time, address other social and environmental risks related to those ASM operations; and<br><br>c. Periodically monitor the effectiveness of mitigation strategies, and adapt plans as necessary to facilitate continued minimization of risks. | | | | *Deleted - redundant (commercial relationships with ASM now integrated into Chapter 1.4)* |
| 3.6.4.2 | | When the LSM mine has commercial relationships with ASM entities that are located in conflict-affected or high-risk areas, the operating company shall carry out due diligence related to those ASM entities as required in IRMA Chapter 3.4. | | | | |

# Chapter 3.6 Cultural Heritage

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **3.7** | | **Cultural Heritage** | **3.6** | | **Cultural Heritage** | |
| ***3.7.2*** | | ***Cultural Heritage Screening and Assessment*** | ***3.6.1*** | | ***Scoping and Baseline Data*** | |
| | | | 3.6.1.1 | | At operational sites, a screening process (or equivalent) is undertaken and documented by competent professionals to identify and understand the cultural heritage context of the operation, as follows :<br>a. This process identifies whether any replicable, non-replicable, or critical cultural heritage, including any formally recognized cultural heritage sites , exists in the site's area of influence;<br>b. It identifies any legal requirements related to the forms of cultural heritage identified;<br>c. It determines whether there have been any past impacts on cultural heritage related to the site and its associated facilities ;<br>d. It identifies any Indigenous Peoples and/or others who may have rights associated with cultural heritage (hereafter collectively referred to as 'rights-holders');<br>e. It identifies other stakeholders who may have an interest in cultural heritage; and<br>f. It includes consultations with relevant rights-holders and stakeholders , to inform the identification of cultural heritage and determination of past impacts (a. and c.). | *New requirement - added to fill a gap with the 2018 IRMA Standard. The version of this chapter in the 2018 Standard clearly addresses the screening and assessment of potential new impacts on cultural heritage but does not outline expectations for existing operations that may have impacted cultural heritage in the past. While many types of cultural heritage cannot be put back or restored once they have been disturbed, there are steps that can be taken to provide mitigation or remedy after the fact.*<br><br>*d. to f. clarify existing expectations found in ESIA and Stakeholder engagement chapters* |

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| 3.7.2.1 | | Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities. | 3.6.1.2 | | When new activities or changes in the project/operations are proposed, a scoping process (or equivalent) is undertaken and documented by competent professionals to identify and understand how they may affect the cultural heritage context of the project/operation, as follows :<br>a. This process identifies whether any replicable, non-replicable, or critical cultural heritage, including any formally recognized cultural heritage sites , that had not been identified before, exists in the site's area of influence ;<br>b. It identifies any legal requirements related to the forms of those cultural heritage identified;<br>c. It identifies whether there are potential risks or impacts to cultural heritage identified in 3.6.1.1 and 3.6.1.2.a posed by proposed mining-related activities ;<br>d. It identifies any Indigenous Peoples and/or others who may have rights associated with the potentially affected cultural heritage (hereafter collectively referred to as 'rights-holders');<br>e. It identifies other stakeholders who may have an interest in the potentially affected cultural heritage; and<br>f. Includes consultations with relevant rights-holders and stakeholders , to inform the identification of cultural heritage and determination of potential risks and impacts (a. and c.) | *Expands on former 3.7.2.1.*<br><br>*b. new sub-requirement aimed at ensuring entities fully understand the legal context in which they are operating as it relates to cultural heritage.*<br><br>*d. to f. are new in this Chapter; however, the need to perform a stakeholder mapping (including of potential impacts on Indigenous Peoples) is drawn from existing requirements in both former and current Chapter 1.2 (Community and Stakeholder Engagement), Chapter 1.3 (Human Rights Due Diligence) and Chapter 2.2 (Indigenous Peoples and FPIC). Therefore it is not an additional expectation of entities.* |
| | | | ***3.6.2*** | | ***Damage Assessment of Past Impacts*** | |
| | | | 3.6.2.1 | | At operational sites, if past impacts on cultural heritage are identified (as per 3.6.1.1), a damage assessment (or equivalent) is carried out and documented by competent professionals., as follows:<br>a. This damage assessment documents the nature of the cultural heritage that has been impacted , the value and importance of the heritage feature/s, and the location of the impacts;<br>b. It documents the extent and significance of the past impacts;<br>c. It documents the extent and significance of any ongoing risks and residual impacts;<br>d. It documents any past activities taken to mitigate or remedy the impacts on cultural heritage , including if past mitigation or remediation efforts were agreed by affected Indigenous Peoples if relevant;<br>e. It includes consultations with relevant rights-holders and stakeholders to inform the identification of past impacts and the nature of the cultural heritage that was impacted;<br>f. It determines whether past mitigation or remediation measures were in conformance with the measures related to replicable, non-replicable or critical cultural heritage found in Annex 3.6-A, and/or, if relevant, with the measures for cultural heritage in protected areas found in Annex 3.6-B; and<br>g. If past mitigation or remediation measures were not in conformance, then it outlines additional mitigation or remediation measures , developed in collaboration with affected rights-holders and stakeholders. | *3.6.2.1 and3.6.2.2 are new requirements - added to fill a gap with the 2018 IRMA Standard. The version of this chapter in the 2018 Standard clearly addresses the screening and assessment of potential new impacts on cultural heritage but does not outline expectations for existing operations that may have impacted cultural heritage in the past. While many types of cultural heritage cannot be put back or restored once they have been disturbed, there are steps that can be taken to provide mitigation or remedy after the fact.*<br><br>*Addition of thes requirements is supported by the responses to Consultation Question 3.7-2.* |

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| ***3.7.2*** | | ***Cultural Heritage Screening and Assessment*** | ***3.6.3*** | | ***Risk and Impact Assessment of Proposed Activities*** | |
| 3.7.2.2 | | If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected. | 3.6.3.1 | | If proposed activities may result in new or additional risks or impacts on cultural heritage (as identified per 3.6.1.2), a risk and impact assessment (or equivalent) is carried out and documented by competent professionals, as follows:<br>a. This risk and impact assessment evaluates the likelihood and magnitude of the potential impacts on replicable, non-replicable or critical cultural heritage identified in 3.6.1.1 and 3.6.1.2 ;<br>b. It includes direct, indirect, and cumulative impacts; and<br>c. It includes collaboration with affected rights-holders and stakeholders to identify acceptable mitigation measures that are consistent with the measures related to replicable, non-replicable and critical cultural heritage found in Annex 3.7-A, and the measures for cultural heritage in protected areas found in Annex 3.7-B, as relevant. | *Incorporates expectations from former 3.7.2.2 and 3.7.1.1, as well as the expectation to collaborate with stakeholders and rights holdres from 3.7.5.1.b.* |
| 3.7.1.1 | | Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals. | | | | |
| 3.7.5.1. | | Except under exceptional circumstances, the operating company shall not remove, significantly alter or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:<br>a. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and<br>b. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. Where impacts may occur to the critical cultural heritage of indigenous peoples negotiation shall take place through the free, prior and informed consent process outlined in IRMA Chapter 2.2, unless otherwise specified by the indigenous peoples. | | | | |
| ***3.7.7*** | | ***Cultural Heritage Management*** | ***3.6.4*** | | ***Management Plan*** | |
| 3.7.7.1 | | A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage. | 3.6.4.1 | | Building on 3.6.1, 3.6.2, and 3.6.3, a cultural heritage management plan (or equivalent) is developed and documented by competent professionals to protect cultural heritage by mitigating risks and impacts, as follows:<br>a. This plan outlines specific measures to mitigate or remedy past, and/or mitigate potential risk and impacts on cultural heritage, in a manner that is consistent with the measures related to replicable, non-replicable and critical cultural heritage found in Annex 3.7-A, and the measures for cultural heritage in protected areas found in Annex 3.7-B, as relevant;<br>b. It identifies success indicators tied to relevant baseline data , to enable evaluation of the effectiveness of mitigation activities over | *Expands on expectations in former 3.7.7.1 (development of a management plan) by specifying that past impacts must also be remedied; and 3.7.1.1 (competent professionals).*<br><br>*a. makes explicit that the management plan include actions related to any and all types of cultural heritage for* |

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| 3.7.1.1 | | Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals. | | | time;<br>c. It identifies the role of affected rights-holders and stakeholders in the collaborative development, implementation, and monitoring and evaluation of the plan;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for affected rights-holders and stakeholders;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan to ensure that funding is available for the effective implementation of the plan. | *which there are risks or actual impacts.*<br><br>*b.makes explicit the need to identify M&E indicators*<br><br>*c. highlights collaboration with stakeholders (in 2018 collaboration with stakeholdlers was specified in former 3.7.5.2, 3.7.5.1, etc. [see final rows of this table] which are now included in Annex 3.6-A) and references to 'internationally recognized practices for the protection of cultural heritage' in several requirements also now incorporated into Annex 3.6-A. However, reference to stakeholder involvement in M&E new.*<br><br>*d. to h. are new: in alignment with Standard-wide expectations re. resourcing for implementation of management plans.* |
| 3.7.7.1 | | A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage. | | | | |
| ***3.7.3*** | | ***Replicable Cultural Heritage*** *(+ all associated requirements - see final rows in this table)* | 3.6.4.2 | | The plan required in 3.6.4.1 (and any additional procedure/s in place) also ensures that:<br>a. Mitigation measures for replicable, non-replicable, and critical cultural heritage are consistent with the best practices listed in Annex 3.6-A, as relevant;<br>b. If actual or potential impacts and risks are associated with cultural heritage in a protected area, mitigation measures are aligned with the requirements in Annex 3.6-B;<br>c. Chance finds are managed, including, at minimum, through a requirement that employees and contractors do not further disturb | *a. and b. incorporate former 3.7.7.1 (development of a management plan) and replace all of the content from former 3.7.3 (replicable cultural heritage), 3.7.4 (non-replicable cultural heritage), and 3.7.5 (critical cultural heritage). Rather than include all of the specific mitigation measures in* |
| ***3.7.4*** | | ***Non-Replicable Cultural Heritage*** *(+ all associated requirements - see final rows in this table)* | | | | |
| ***3.7.5*** | | ***Critical Cultural Heritage*** *(+ all associated requirements except for 3.7.5.2 - see final rows in this table)* | | | | |

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| 3.7.7.2 | | If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:<br><br>a. Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed;<br><br>b. Managing potential impacts to cultural heritage from contractors and visitors;<br><br>c. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and<br><br>d. If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage. | | | any chance find until an evaluation by competent professionals is made and mitigation actions consistent with Annex 3.6-A and Annex 3.6-B of this Chapter are developed, as relevant;<br>d. Relevant employees and contractors receive training on cultural heritage site recognition and care, and on the ENTITY's plans and procedures related to cultural heritage management;<br>e. Potential risks and impacts to cultural heritage from visitors to the site and its associated facilities are mitigated and managed; and<br>f. Continued access to cultural sites is allowed, subject to: 1) Consultations with relevant Indigenous Peoples and affected communities; and 2) Any overriding health, safety, and security considerations. | *the chapter itself, we are proposing to move them to Annexes to improve readability and flow of the chapter. Those measures are still normative and, if not being met, will be reflected in the rating and narrative for the requirement in the public audit report.*<br><br>*c. incorporates former 3.7.7.2.a*<br><br>*d. from former 3.7.7.3*<br><br>*e. from former 3.7.7.2.b*<br><br>*f. from former 3.7.7.2.c* |
| 3.7.7.3 | | The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management. | | | | |
| ***3.7.6*** | | ***Commercial Use of Cultural Heritage*** | | | | |
| 3.7.6.1 | | Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development. | 3.6.4.3 | | The plan required in 3.6.4.1 (and any additional procedure/s in place) also ensures that, when the project intends to make commercial use of cultural heritage that is **not** Indigenous Peoples' cultural heritage, such use only takes place:<br>a. After the affected custodians and/or communities of such cultural heritage have been informed of their rights under the country of operation's law, the scope and nature of proposed commercial development, and the potential consequences of such development; and<br>b. After good faith negotiations have included meaningful consultation with the affected custodians and/or communities, and their participation has been documented; and<br>c. After the negotiations have resulted in a mutual agreement on the fair and equitable sharing of benefits. | *Combined former 3.7.6.1 and 3.7.6.2 and added details to achieve alignment with EBRD 2023 guidance.* |
| 3.7.6.2 | | The operating company shall not proceed with such commercialization unless it:<br><br>a. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and<br><br>b. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions. | | | | |
| | | | ***3.6.5*** | | ***Specific Measures for Cultural Heritage of Indigenous Peoples*** | |

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| 3.7.5.1 | | Except under exceptional circumstances, the operating company shall not remove, significantly alter or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:<br>a. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage;192 and<br>b. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. Where impacts may occur to the critical cultural heritage of indigenous peoples negotiation shall take place through the free, prior and informed consent process outlined in IRMA Chapter 2.2, unless otherwise specified by the indigenous peoples | 3.6.5.1 | Critical | When cultural heritage of Indigenous Peoples exists in the site's area of influence:<br>a. Proposed mining-related activities that may impact Indigenous Peoples' critical cultural heritage proceed only with the free, prior and informed consent of the affected Indigenous Peoples, in accordance with relevant requirements of Chapter 2.2;<br>b. Mitigation strategies for past impacts and new impacts and risks on Indigenous Peoples' cultural heritage are agreed by Indigenous Peoples prior to their implementation, in accordance with relevant requirements of Chapter 2.2; and<br>c. Procedures are developed to allow for the public sharing of information related to Indigenous Peoples' cultural heritage, subject to agreement with affected Indigenous Peoples. | *Subrequirement 3.6.5.1.a is consistent with 3.7.5.1.b.*<br><br>*Subrequirement 3.6.7.2.b clarifies what was already expected in Chapter 2.2. The inclusion of mitigation strategies to address past impacts is supported by responses to Consultation Question 3.7-02.*<br><br>*Subrequirement 3.6.5.1.c is consistent with 3.7.7.2.c.*<br><br>*Proposed as a critical requirement.* |
| 3.7.7.2 | | 3.7.7.2. If a new or existing mines is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:<br>a. Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed;<br>b. Managing potential impacts to cultural heritage from contractors and visitors;<br>c. Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and<br>d. If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage. | | | | |
| 3.7.6.3 | | Where the operating company proposes to use indigenous peoples' cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples. | 3.6.5.2 | Critical | When the project intends to make commercial use of cultural heritage of Indigenous Peoples, the Entity has a system in place to ensure, and can demonstrate, that this only takes place :<br>a. After the Indigenous Peoples have been informed of their rights under the country of operation's law, the scope and nature of proposed commercial development, and the potential consequences of such development;<br>b. If, and only if, the Entity has obtained the free, prior and informed consent of the Indigenous Peoples, in accordance with relevant requirements of Chapter 2.2, and after the negotiations have resulted in a mutual agreement on the fair and equitable sharing of benefits. | *Added more detail to achieve alignment with EBRD 2023 guidance.*<br><br>*Proposed as a critical requirement.* |
| | | | ***3.6.6*** | | ***Monitoring and Evaluation*** | |

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| | | | 3.6.6.1 | | To monitor and evaluate the effectiveness and appropriateness of its measures to mitigate all significant risks and impacts on cultural heritage, the ENTITY collaborates with affected rights-holders and stakeholders, and custodians of cultural heritage to, at least annually:<br>a. Track and document the ENTITY's performance on mitigating or remediating past impacts, and mitigating current potential risks and impacts to cultural heritage, over successive time periods, against the success indicators required in 3.6.4.1;<br>b. Encourage and facilitate joint monitoring and joint tracking with affected rights-holders and stakeholders, and custodians of cultural heritage, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, as per Chapter 1.2 ; and<br>c. Include continuous feedback from internal and external sources, including from joint monitoring and joint tracking with rights-holders and stakeholders, and custodians of cultural heritage. | *New requirement - included to align with Plan-Do-Check-Act cycle being integrated Standard-wide.* |
| | | | ***3.6.7*** | | ***Continuous Improvement*** | |
| | | | 3.6.7.1 | | At least annually, but without undue delay after a significant change, the ENTITY collaborates with affected rights-holders and stakeholders, and custodians of cultural heritage to:<br>a. Review the monitoring and evaluation results, informed by internal and external feedback, as per Section 3.6.6;<br>b. Review any cultural heritage-related grievances (see Chapter 1.6);<br>c. Review the ENTITY's effectiveness in mitigating or remediating past impacts, and mitigating current potential risks and impacts on cultural heritage, informed by the monitoring and evaluation required in 3.6.6.1;<br>d. Develop and implement time-bound corrective measures to update, if necessary , the scoping and baseline data collection process in accordance with Section 3.6.1;<br>e. Develop and implement time-bound corrective measures to update, if necessary , the damage assessment (if relevant) and the risk and impact assessment in accordance with Sections 3.6.2 and 3.6.3;<br>f. Develop and implement time-bound corrective measures to update, if necessary , its monitoring and evaluation processes in accordance with Section 3.6.6. | *New requirement - included to align with Plan-Do-Check-Act cycle being integrated Standard-wide.* |
| ***3.7.1*** | | ***General Stipulations*** | ***3.6.8*** | | ***Information-Sharing and Public Reporting*** | |

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| 3.7.1.3 | | Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues. | 3.6.8.1 | | The Entity makes and maintains publicly accessible, and proactively shares with affected rights holders and stakeholders:<br>a. Summary versions and key findings of cultural heritage scoping, damage assessment, and risk and impact assessment processes;<br>b. Summary versions and key findings of cultural heritage management plan, including specific measures for cultural heritage of Indigenous Peoples (if applicable), and an annual update on the progress made to implement the plan; and<br>c. Information on the cultural heritage features within the project/operation's area of influence and any significant new understanding is proactively shared with stakeholders and the general public to raise awareness about, and appreciation of, the value of these features. | *Expands upon intent of former 3.7.1.3 to achieve alignment with EBRD 2023 requirement 8 and associated guidance.* |
| 3.7.5.5 | | To safeguard irreplaceable cultural heritage and respect indigenous peoples' right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation. | | | | *Now addressed in Chapter 2.2 (Indigenous Peoples and FPIC)* |
| 3.7.5.4 | | An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:<br><br>a. The mine was developed prior to the area's official designation;<br><br>b. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the cultural values for which the area was designated or recognized; and<br><br>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. | | | | *Now addressed in Chapter 4.5 (Biodiversity, Ecosystem Services, and Protected and Conserved Areas)* |
| ***3.7.3*** | | ***Replicable Cultural Heritage*** | | | | |

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| 3.7.3.1 | | When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply:<br><br>a. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it;<br><br>b. Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it;<br><br>c. Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and<br><br>d. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage. | | | | *Now included in Annnex 3.6-A.* |
| 3.7.3.2 | | All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage. | | | | *Now included in Annnex 3.6-A.* |
| ***3.7.4*** | | ***Non-Replicable Cultural Heritage*** | | | | |
| 3.7.4.1 | | The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:<br><br>a. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and<br><br>b. Any removal of cultural heritage is conducted using the best available technique. | | | | *Now included in Annnex 3.6-A.* |
| 3.7.4.2 | | All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage. | | | | *Now included in Annnex 3.6-A.* |
| ***3.7.5*** | | ***Critical Cultural Heritage*** | | | | |

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| 3.7.5.1 | | Except under exceptional circumstances, the operating company shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:<br><br>a. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and<br><br>b. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. (Note: Where impacts may occur to indigenous peoples' critical cultural heritage, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples). | | | | *Now included in Annnex 3.6-A.* |
| 3.7.5.2 | | When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:<br><br>a. Comply with the requirement 3.7.5.1;<br><br>b. Comply with the protected area's management plan;<br><br>c. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and<br><br>d. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. | | | | *Now included in Annnex 3.6-A.* |
| 3.7.5.3 | | IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).<br><br>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;<br>• International Union for Conservation of Nature (IUCN) protected area management categories I-III;<br>• Core areas of UNESCO biosphere reserves. | | | | *Now included in Annnex 3.6-A.* |

# Chapter 3.7 Noise and Vibration

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **4.4** | | **Noise and Vibration** | **3.7** | | **Noise and Vibration** | |
| ***4.4.1*** | | ***Noise and Vibration Screening*** | ***3.7.1*** | | ***Scoping and Baseline Data*** | |
| 4.4.1.1 | | The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project's noise and/or vibration. Screening is required at all new mines, and also at existing mines if there is a proposed change to the mine plan that is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels. | 3.7.1.1 | | A scoping process (or equivalent) is carried out and documented by competent professionals, as follows:<br>a. It determines if there may be significant noise and/or vibration impacts on human receptors or structures from mining-related activities and/or associated facilities;<br>b. It builds on relevant existing baseline data;<br>c. Is informed by consultations with affected rights-holders and stakeholders; and<br>d. It is updated without undue delay after a significant change that may result in a new source of noise or vibration or an increase in existing noise or vibration levels. | *Expands upon former 4.4.1.1*<br><br>*b. and c. are new sub-requirements, consistent with similar changes in other chapters*<br><br>*d. incorporates intent of former 4.4.1.1 reference to frequency of updates and removes distinction between new / existing mines* |
| 4.4.1.2 | | If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors. | 3.7.1.2 | | If the scoping process identifies that human receptors or structures may be significantly affected by noise and/or vibration from mining-related activities or associated facilities, baseline ambient noise and vibration levels in potentially-affected and affected areas are gathered and documented by competent professionals. | *Former 4.4.1.2* |
| ***4.4.2*** | | ***Management and Mitigation of Impacts on Human Receptors*** | ***3.7.2*** | | ***Monitoring Program*** | |
| | | | 3.7.2.1 | | When the scoping required in 3.7.1, or other credible information including grievances filed, indicate that there are human receptors or structures that may be significantly affected by noise or vibration from mining-related activities, a monitoring program is developed and implemented by competent professionals to monitor noise and/or vibration levels (as relevant), as follows:<br>a. The monitoring program uses credible methods at relevant location/s and with appropriate equipment;<br>b. If levels exceed those in Annex 3.7, the ENTITY develops and implements corrective actions, remediation actions if relevant, and updates management plan accordingly, and continues to monitor noise/vibration; and<br>c. If levels do not exceed those in Annex 3.7, or when exceedance has been corrected , monitoring may be discontinued . | *New requirement for monitoring programme. This aligns with the request for more "adaptive management" measures across environmental chapters* |
| | | | ***3.7.3*** | | ***Management Plan*** | |

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| | | | 3.7.3.1 | | If the scoping required in 3.7.1, and/or results from the monitoring program required in 3.7.2, and/or any other credible information , indicate that there are human receptors or structures that may be significantly affected by noise or vibration from mining-related activities, a noise and vibration management plan (or equivalent) is developed and documented by competent professionals, as follows:<br>a. The plan is informed by consultations with affected rights-holders and stakeholders, in a manner that is inclusive of different genders, ages, ethnicities, disabilities, and any potentially underserved and/or marginalized people;<br>b. It outlines specific measures that strictly align with the mitigation hierarchy to avoid and, where not possible, minimize and remediate or compensate adverse impacts related to noise and vibration;<br>c. It includes appropriate qualitative and quantitative performance indicators (including gender-disaggregated indicators where appropriate), that have been agreed upon with affected rights-holders and stakeholders, to enable evaluation of the effectiveness of mitigation measures over time;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It includes clearly-defined timelines and an implementation schedule that specifies the expected outcomes for the affected people;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *New requirement in alignment with Standard-wide changes explicitly requiring management plans.* |
| | | | ***3.7.4*** | | ***Response to Grievances*** | *New heading* |
| 4.4.3.1 | | When stakeholders make a noise-related complaint, the operating company shall provide relevant noise data and information to them. Otherwise, noise data and information shall be made available to stakeholders upon request. | 3.7.4.1 | | If the ENTITY receives a credible, supported grievance that noise or vibration is adversely impacting human receptors or structures, the ENTITY:<br>a. Initiates monitoring in accordance with 3.7.2 to determine noise and/or vibration levels at the receptor or other appropriate monitoring location;<br>b. It proactively shares relevant data and information, including the monitoring results, with the complainant/s and any affected rights-holders and stakeholders;<br>c. If there are exceedances of the limits in Annex 3.7, it develops, in collaboration with affected rights-holders and stakeholders, mitigation strategies or other specific measures to resolve the grievance; and<br>d. It collaborates with affected rights-holders and stakeholders to monitor, evaluate, and review, the effectiveness of these mitigation strategies or measures in resolving the grievance, and to develop, if necessary, corrective measures. | *Mostly a new requirement aligned with Plan-Do-Check-Act approach; information-sharing comes from former 4.4.3.1.* |

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| 4.4.2.2 | | The following exceptions to 4.4.2.1 apply:<br><br>a. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or<br><br>b. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met. | | | | *Incorporated into normative Annex 3.7* |
| 4.4.2.3 | | If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA. | | | | *Incorporated into normative Annex 3.7* |
| 4.4.2.4 | | If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows:<br><br>a. A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period;<br><br>b. Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and<br><br>c. Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time. | | | | *Incorporated into normative Annex 3.7* |

# PRINCIPLE 4: ENVIRONMENTAL RESPONSIBILITY

## Chapter 4.1 Waste and Materials Management

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| **Req #** | Critical | **Requirement** | **Req #** | Critical | **Requirement** | ***Comment*** |
| **4.1** | | **Waste and Materials Management** | **4.1** | | **Waste and Materials Management** | |
| ***4.1.2*** | | ***Safe Management of Materials Other Than Mine Wastes*** | ***4.1.1*** | | ***Scoping*** | *Heading changed* |
| 4.1.2.1 | | The operating company shall:<br><br>a. Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and<br><br>b. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. | 4.1.1.1 | Critical | A scoping process (or equivalent) is undertaken by competent professionals to identify all potentially hazardous materials and hazardous wastes associated with the site and its associated facilities, as follows:<br>a. The process identifies all potentially hazardous materials transported to, and used at, the site or its associated facilities ;<br>b. It identifies all potentially hazardous materials and wastes extracted from, or produced at, the site or its associated facilities as a result of mining or processing activities ;<br>c. It identifies all potentially hazardous wastes produced at the site or its associated facilities that are not derived from mining or mineral processing activities; | *Expands on former 4.1.2.1, 4.1.3.2, and 4.1.7.1 by making it clear that process be in place to do the identification, and that the process be undertaken by suitably qualified people (i.e., competent professionals).*<br><br>*Also, added more clarity on the types of materials and wastes that need to be identified. The materials and wastes in* |

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| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br><br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);<br><br>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:<br><br>i. Analysis of petrology, mineralogy, and mineralization;<br><br>ii. Identification of geochemical test units;<br><br>iii. Estimation of an appropriate number of samples for each geochemical test unit; and<br><br>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.<br><br>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;<br><br>d. Water balance and chemistry mass balance models for each facility; and<br><br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | | | d. It includes identification and mapping of the existing or planned locations where potentially hazardous materials, hazardous wastes and, if relevant, non-hazardous wastes are transported to, stored, used, treated and/or disposed on-site, at associated facilities, or off-site ;<br>e. It includes collaboration with relevant affected rights-holders and stakeholders to identify concerns, challenges, and opportunities related to the planned locations; and<br>f. It includes collaboration with relevant affected rights-holders and stakeholders to identify possible risks and impacts, and actual impacts, associated with potentially hazardous materials and wastes transported to, stored on, and used at the site. | *a and c were addressed to some extent in guidance for the former 4.1.2.1.*<br><br>*The materials and wastes in b were addressed in the former 4.1.3.2 (see 4.1.3.2.b and e).* |
| 4.1.7.1 | | Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities. | | | | |
| ***4.1.3*** | | ***Mine Waste Source Characterization and Impact Prediction*** | ***4.1.2*** | | ***Characterization*** | *Heading number and name changed* |

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| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br><br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);<br><br>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:<br><br>i. Analysis of petrology, mineralogy, and mineralization;<br><br>ii. Identification of geochemical test units;<br><br>iii. Estimation of an appropriate number of samples for each geochemical test unit; and<br><br>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.<br><br>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;<br><br>d. Water balance and chemistry mass balance models for each facility; and<br><br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | 4.1.2.1 | | For each potentially hazardous solid or semi-solid material and waste produced as a result of mining or mineral processing activities (identified in 4.1.1.1.b ), a chemical characterization is carried out and documented by competent professionals, as follows:<br>a. It uses a credible methodology, and the methodology is documented;<br>b. It determines the potential for acid rock drainage (ARD), the potential for radioactivity, and the potential for contaminant or metals leaching (ML);<br>c. If relevant, it includes analysis of petrology, mineralogy, and mineralization, and identification of geochemical test units or representative ranges of chemical composition;<br>d. It includes estimation of an appropriate number of samples for each geochemical test unit or range of material compositions, and performing comprehensive geochemical testing on all samples from each geochemical test unit, or, for solid wastes for which geochemical test units are not relevant (such as mineral sands), on samples representative of the range of compositions ; and<br>e. It identifies the COPCs for each relevant material and waste. | *a. and b. clarifies former 4.1.3.2.b*<br><br>*c. aligns with former 4.1.3.2.b.i and ii.*<br><br>*d. aligns with former 4.1.3.2.b.iii and iv.*<br><br>*e. aligns with former 4.1.3.2.e.*<br><br>*Note that this requirement has been split into 4.1.2.1 (solid and semi-solid) and 4.1.2.2 (liquid)* |
| | | | 4.1.2.2 | | For each potentially hazardous liquid material and waste produced as a result of mining or mineral processing activities (identified in 4.1.1.1.b ), a chemical characterization is carried out and documented by competent professionals, as follows:<br>a. It uses a credible methodology, and the methodology is documented;<br>b. It includes estimation of an appropriate number of samples for each compositional range;<br>c. It includes full chemical characterization of the materials and wastes for constituents identified in the IRMA Water Quality Criteria (see Annex 4.3-A in Chapter 4.3); and<br>d. It identifies the COPCs for each relevant material and waste . | *a. and b. clarifies former 4.1.3.2.b*<br><br>*c. aligns with former 4.1.3.2.b.i and ii.*<br><br>*d. aligns with former 4.1.3.2.b.iii and iv.*<br><br>*e. aligns with former 4.1.3.2.e.*<br><br>*Note that this requirement has been split into 4.1.2.1 (solid and semi-solid) and 4.1.2.2 (liquid)* |

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| | | | 4.1.2.3 | | For each potentially hazardous waste not derived from mining or mineral processing activities (as identified in 4.1.1.1.c), a chemical characterization is carried out and documented by competent professionals, as follows:<br>a. It uses a credible methodology, and the methodology is documented;<br>b. It determines if it has characteristics or properties that make it dangerous or capable of having a harmful effect on human health or safety, biodiversity, or the environment; and<br>c. It documents the hazardous properties or characteristics, and the related potential health, safety, or environmental impacts. | *This is new, but it aligns with the expectations for hazardous mining or mineral processing materials/wastes in 4.1.3.2.*<br><br>*4.1.2.3 expands on the identification process in 4.1.1.1 by requiring additional characterization of the hazardous qualities of the potentially hazardous wastes identified in 4.1.1.1.c (this category of waste was not specifically mentioned in the 2018 version of the standard).* |
| | | | 4.1.2.4 | | For each potentially hazardous material transported to, or used at, the site or its associated facilities (identified in 4.1.1.1.a), a chemical characterization is carried out and documented by competent professionals, as follows:<br>a. It uses a credible methodology, and the methodology is documented;<br>b. It determines if it has characteristics or properties that make it dangerous or capable of having a harmful effect on human health or safety, biodiversity, or the environment ;<br>c. If applicable, it identifies contaminants of potential concern (COPCs) in feed materials purchased for mineral processing operations ; and<br>d. It documents the hazardous properties or characteristics, and the related potential health, safety, or environmental impacts. | *This is new, but it aligns with the expectations for hazardous mining or mineral processing materials/wastes in 4.1.3.2.*<br><br>*4.1.2.4 expands on the identification process in 4.1.1.1 by requiring additional characterization of the hazardous qualities of the potentially hazardous wastes identified in 4.1.1.1.a (this category of waste was not specifically mentioned in the 2018 version of the standard).* |
| ***4.1.4*** | | ***Waste Facility Assessment*** | ***4.1.3*** | | ***Risk and Impact Assessment*** | *Heading number and name changed* |

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| 4.1.4.1 | Critical | A risk-based approach to mine waste assessment and management shall be implemented that includes:<br><br>a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;<br><br>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;<br><br>c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and<br><br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | 4.1.3.1 | | Building on 4.1.1 and 4.1.2, where COPCs or potential risks or impacts from hazardous wastes or hazardous materials are identified, a risk and impact assessment (or equivalent) is carried out and documented by competent professionals, as follows:<br>a. It uses a credible methodology, and the methodology is documented;<br>b. It determines Contaminants of Concern (COCs) and specific risks that will need to be mitigated and managed in accordance with Sections 4.1.5 and 4.1.6;<br>c. It assesses the risks and impacts to human health or safety, biodiversity, or the environment from hazardous wastes; and<br>d. It assesses the risks and impacts to human health or safety, biodiversity, or the environment from hazardous materials. | *The need to asssess risks related to hazardous materials and wastes was addressed in the former 4.1.4.1.* |
| | | | 4.1.3.2 | IRMA+ | IRMA+<br>The identified risks on, and impacts to, human health or safety, biodiversity, or the environment, from non-hazardous wastes that are extracted, used or produced by the site, are also integrated in relevant risk and impact assessment processes, as per 4.1.3.1. | *New OPTIONAL requirement to assess risks related to non-hazardous wastes.*<br>*(See response to Consultation Question 4.1-06)* |
| ***4.1.8*** | | ***Additional Considerations*** | ***4.1.4*** | | ***Riverine, Lake, and Marine Disposal or Storage*** | *Heading number and name changed* |
| 4.1.8.1 | Critical | At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be certified by IRMA. | 4.1.4.1 | Critical | The Entity can demonstrate that it does not propose to, nor actually, dispose of or store wastes produced as a result of mining or mineral processing activities in rivers, lakes, or marine environments. | *This requirement aligns with the former 4.1.8.1.* |
| | | | 4.1.4.2 | | If riverine, lake, or marine disposal or storage of wastes produced as a result of mining or mineral processing was previously used at the site (but no longer occurs), by the ENTITY and/or any previous owner/s, a remediation action plan (or equivalent) is developed by competent professionals to address the damage that has been done, through:<br>a. Determination of the nature and extent of the damage, to the greatest extent possible;<br>b. Development and documentation of specific measures to remediate the damage and/or minimize any ongoing/continuous damage ; and<br>c. Development of estimated timeline and budget needed to implement the remediation action plan (or equivalent);<br>d. Inclusion of a financing plan to ensure that funding is available for effective implementation of the remediation measures; and<br>e. Implementation of the remediation measures. | *This is a new requirement. It acknowledges that in the cases where the practice of riverine, lake and marine waste disposal may have occurred in the past that Entities cannot do nothing to change that fact. But in order to be considered a responsible operator it creates expectations that Entities develop and implement an action plan to address any damage that occurred as a result of those past practices.* |

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| | | | 4.1.4.3 | IRMA+ | IRMA+<br>The Entity can demonstrate that it does not propose to, nor actually, dispose of, or store, any wastes (including those not derived from mining or mineral processing activities) in rivers, lakes or marine environments. | *New OPTIONAL requirement expands on the expectation that Entities refrain from disposing of mining and processing wastes in water bodies (as per 4.1.4.1). It creates an expectation that no wastes be disposed or stored in rivers, lakes or marine environments.* |
| ***4.1.5*** | | ***Mitigation of Risks and Management of Mine Waste Management Facilities*** | ***4.1.5*** | | ***Waste Reduction and Management*** | *Heading number and name changed* |
| 4.1.5.2 | | Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:<br><br>a. Priority shall be given to source control measures to prevent generation of contaminants;<br><br>b. Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent or minimize the movement of contaminants to where they can cause harm; and<br><br>c. If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes. | 4.1.5.1 | | Building on 4.1.3, and in addition to the concurrent reclamation plan required in Chapter 2.7 and the management of tailings and mine waste storage facilities required in Chapter 4.2 , a hazardous waste management plan (or equivalent) is developed and documented by competent professionals, to reduce the generation of hazardous wastes, and to prevent, mitigate, and remediate all the risks and impacts on human health or safety, biodiversity, or the environment, from the hazardous wastes identified as per 4.1.3.1, as follows:<br>a. The plan includes mitigation measures that strictly align with the waste mitigation hierarchy to prioritize measures that prevent generation of hazardous wastes ;<br>b. It includes mitigation measures that align, to the extent possible, with the preferences of affected rights-holders and stakeholders regarding post-closure end-uses of affected areas ;<br>c. It is informed by specific risk assessment/s to determine the level of risk to human health and safety, biodiversity, and the environment associated with all selected mitigation measures identified ;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It has an implementation schedule in place;<br>g. It specifies annual, or more frequent, reviews of the effectiveness of the measures implemented;<br>h. It maintains estimates of human resources and budget required; and<br>i. It includes a financing plan, to ensure that funding is available for the effective implementation of the plan. | *a. aligns with concepts in the former 4.1.5.2, in particular, use of the mitigation hierarchy to control the generation of wastes (or contaminants in the waste materials).*<br><br>*b. incorporates expectations from two former requirements - former 4.1.7.1, which requied that stakeholders be consulted on management alternatives, and 2.6.2.1 (from former Chapter 2.6 - Planning and Financing Reclamation and Closure), which required that any mining-related activities, including mitigation, be compatible with stakeholders' agreed post-mining end uses.*<br><br>*c. aligns with the former 4.1.4.1, which required a risk-based approach to waste assessment and management.*<br><br>*d. to i. are new; aligned with Standard-wide expectations re:* |
| 4.1.7.1 | | Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities. | | | | |
| 2.6.2.1 | Critical | Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use. | | | | |

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| 4.1.4.1 | Critical | A risk-based approach to mine waste assessment and management shall be implemented that includes:<br><br>a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;<br><br>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;<br><br>c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and<br><br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | | | | *resourcing for management plans.* |
| 4.1.2.1 | | The operating company shall:<br><br>a. Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and<br><br>b. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. | 4.1.5.2 | | For each identified hazardous waste, the plan required in 4.1.5.1 includes the following procedures for safe handling, transport, storage, re-use, recycling, treatment and disposal , as appropriate :<br>a. Disposal container or containment materials are appropriate for the specific hazardous contents, and engineering controls are implemented to prevent the release of the hazardous wastes or their components into the workplace or the environment ;<br>b. Appropriate protective equipment and clothing are provided to relevant workers to prevent illness or injury from exposure to hazards , and appropriate hygiene practices are implemented in relevant work areas ;<br>c. Specific occupational safety and health training to relevant workers, in accordance with applicable requirements in Chapter 3.2, that includes instruction on: 1) Where to find safety data information and other relevant information related to the chemicals of concern; and 2) Appropriate methods for transporting, handling, storing, using and disposing of hazardous wastes ; and<br>d. These procedures (a. to c.) are developed and documented by competent professionals. | *4.1.5.2 expands on expectations in former 4.1.2.1.b (a. provides more specificity on safe storage<br><br>b. and c. provides more specificity on safe handling).<br><br>Some of the content in c, e.g., safety data sheets, was included in guidance for the former 4.1.2.1.* |

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| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);<br>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:<br>i. Analysis of petrology, mineralogy, and mineralization;<br>ii. Identification of geochemical test units;<br>iii. Estimation of an appropriate number of samples for each geochemical test unit; and<br>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.<br>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;<br>d. Water balance and chemistry mass balance models for each facility; and<br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | 4.1.5.3 | | The plan required in 4.1.5.1 also includes procedures to document and keep records of the following information about all hazardous wastes identified:<br>a. The annual quantity of hazardous wastes generated, both solid and liquids contents;<br>b. The storage, treatment and disposal locations, on-site and off-site;<br>c. Waste transport, treatment, and disposal dates/periods, and shipping/transport dates; and<br>d. If applicable, regulatory authorizations for any third-party vendors contracted/engaged by the ENTITY for transport and off-site treatment or disposal of hazardous wastes. | *a. was not explicitly stated in the 2018 Standard, but the concepts of documenting quantities of wastes generated or stored were embedded in the former 4.1.3.2 (c. Water balance and chemistry mass balance models for each facility) and 4.1.3.3 (f. Short-term and long-term placement plans and schedule for tailings).*<br><br>*b. reflects expectations that were previously only captured in guidance (in particular, means of verification) for 4.1.2.1. That guidance said, "Documentation should list facilities and provide their locations on a map."*<br><br>*c. and d. are new.* |
| 4.1.3.3 | | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:<br>a. Detailed engineering reports, including site investigations, seepage and stability analyses;<br>b. Independent technical review (See criteria 4.1.6)<br>c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment;<br>d. Descriptions of facility design criteria;<br>e. Design report(s);<br>f. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns;<br>g. Master tailings placement plan (based on life of mine);<br>h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report;<br>i. Facility water balances (See also 4.1.3.2.d); and<br>j. Dam breach inundation (if applicable) and waste rock dump runout analyses. | | | | |

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| | | | 4.1.5.4 | | If the Entity has contracted/engaged any third-party vendors for transport and off-site treatment or disposal of hazardous wastes, procedures are developed and implemented to:<br>a. Confirm that the third-party treatment or disposal facility is licensed to carry out the treatment or disposal activities, prior to any contractual arrangement;<br>b. Confirm that the third-party treatment or disposal facility is operational and in compliance with applicable environmental and health and safety regulations, prior to any contractual arrangement; and<br>c. Require, through contractual agreement, that at least every three years either the Entity will carry out an inspection of the facility or the facility will provide a third-party inspection report to the Entity. | *New requirement . See IRMA response to Consultation Question 4.1-12.* |
| | | | 4.1.5.5 | IRMA+ | A non-hazardous waste management plan (or equivalent) is developed and documented by competent professionals, in accordance with 4.1.5.1, 4.1.5.2, 4.1.5.3, and 4.1.5.4, to reduce the generation of non-hazardous wastes, and to prevent, mitigate, and remediate all risks to, and impacts on, human health or safety, biodiversity, or the environment, from non-hazardous wastes, identified as per 4.1.3.2. | *New OPTIONAL requirement* |
| | | | ***4.1.6*** | | ***Materials Management*** | *New heading* |
| | | | 4.1.6.1 | | Building on 4.1.3, and in addition to the concurrent reclamation plan required in Chapter 2.7 , a management plan for hazardous materials (or equivalent) is developed and documented by competent professionals, to prevent all risks and impacts on human health or safety, biodiversity, or the environment, from the hazardous materials identified as per 4.1.3.1, and to mitigate and remediate those risks and impacts that cannot be prevented, as follows:<br>a. The plan includes mitigation measures that strictly align with the mitigation hierarchy to prioritize measures that eliminate the need for hazardous materials ;<br>b. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>c. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>d. It has an implementation schedule in place;<br>e. It specifies annual, or more frequent, reviews of the effectiveness of the measures implemented;<br>f. It maintains estimates of human resources and budget required; and<br>g. It includes a financing plan, to ensure that funding is available for the effective implementation of the plan. | *A management plan for hazardous materials is new.*<br><br>*b. to g. are aligned with Standard-wide expectations re: resourcing for management plans.* |

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| 4.1.2.1 | | The operating company shall:<br><br>a. Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and<br><br>b. Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. | 4.1.6.2 | | For each identified hazardous material, the plan includes procedures for safe transportation (to the site and associated facilities), handling, storage, re-use, recycling, treatment and disposal, as appropriate :<br>a. Storage container and conveyance materials are appropriate for the specific hazardous contents, and engineering controls are implemented to prevent the release of the hazardous materials into the workplace or the environment ;<br>b. Appropriate protective equipment and clothing are provided to relevant workers to prevent illness or injury from exposure to hazards , and appropriate hygiene practices are implemented in relevant work areas ;<br>c. Specific occupational health and safety training to relevant workers, in accordance with applicable requirements in Chapter 3.2, that includes instruction on: 1) Where to find safety data information and other relevant information related to the chemicals/materials of concern; and 2) Appropriate methods for transporting, handling, storing, using and disposing of hazardous materials;<br>d. These procedures (a. to c.) are developed and documented by competent professionals. | *Procedures related to hazardous materials were covered in the former 4.1.2.1.*<br><br>*4.1.6.2 expands on expectations in former 4.1.2.1.b (a. provides more specificity on safe storage,*<br><br>*b. and c. provides more specificity on safe handling).*<br><br>*Some of the content in c., e.g., safety data sheets, was included in guidance for the former 4.1.2.1.* |
| | | | 4.1.6.3 | | The plan includes procedures to document and keep record of the following information about all hazardous materials identified:<br>a. The annual quantity of hazardous materials transported to the site and associated facilities ;<br>b. The annual quantity produced at the site and associated facilities ;<br>c. The annual quantity used at the site and associated facilities;<br>d. The annual quantity transferred off-site;<br>e. The storage, usage, and disposal locations, on-site and off-site;<br>f. Shipping/transport dates and supplier information for materials coming to the site and associated facilities; and<br>g. Shipping/transport dates and receiver information for any hazardous materials transported off-site . | *There was previously no requirement to keep records volumes of hazardous materials transported, stored, or disposed of on-site or off-site.* |

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| | | | 4.1.6.4 | IRMA+ | IRMA+<br>A circularity plan for non-hazardous materials (or equivalent) is developed and documented by competent professionals, to maximize circular uses of materials. The plan:<br>a. Assesses the opportunities for circular uses of all non-hazardous materials;<br>b. Includes time-bound measures and targets to maximize the identified opportunities; and<br>c. Is developed in collaboration with institutions and businesses to maximize synergies with their respective circular uses of materials. | *New OPTIONAL requirement to optimize opportunities for circular uses of non-hazardous wastes.*<br>*(See response to Consultation Question 4.1-05)* |
| | | | ***4.1.7*** | | ***Cyanide Management*** | *New heading* |
| 4.7.1.1 | Critical | If the operating company is eligible to be a signatory to the Cyanide Code, it shall obtain a certification of compliance in accordance with the requirements of the International Cyanide Management Institute (ICMI). | 4.1.7.1 | Critical | If cyanide will be, or is, transported to and stored on-site in bags or bulk containers, or used as a chemical in any aspect of mining or mineral processing, and if the site is eligible to be certified by the International Cyanide Management Institute (ICMI):<br><br>a. The site is currently certified as being in full compliance with the International Cyanide Management Code (The Cyanide Code) in accordance with the verification requirements of the ICMI;<br><br>b. The Entity has a system in place to proactively share summary audit reports with relevant stakeholders; and<br><br>c. All cyanide producers and transporters supplying the operation are certified as meeting the "Cyanide Production and Transport Practices" of the Cyanide Code.<br><br>**OR** | *NOTE: This requirement is an alternative that applies when a site IS eligible to be certified by ICMI.*<br><br>*Combines requirements from Chapter 4.7 – 'Cyanide Management' of the 2018 Mining Standard. We are proposing to delete that chapter and incorporate its expectations into other relevant IRMA chapters. Given that cyanide is a hazardous chemical, some requirements have been added into this chapter.*<br><br>*4.1.7.1.a aligns with former 4.7.1.1.*<br><br>*4.1.7.1.b adds element to "proactively share" audit reports (former 4.7.5.2 only required links to audit reports in annual reports).*<br><br>*4.1.7.1.c aligns with former 4.7.1.3.* |
| 4.7.5.2 | | If the operating company is a Cyanide Code signatory it shall include in its annual report or sustainability report a link to the company's audit information and corrective actions published on the ICMI website. | | | | |
| 4.7.1.3 | | The operating company shall demonstrate that it has taken steps to ensure that cyanide producers and transporters supplying the mining project are certified as meeting the "Cyanide Production and Transport Practices" of the Cyanide Code. | | | | |

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| 4.7.1.2 | | If the operating company is not eligible to become a signatory of the Cyanide Code, but the mining project requires the storage onsite of cyanide in bags or bulk containers, or uses cyanide in a mill process, the mine's cyanide management practices shall be:<br><br>a. Audited against the Cyanide Code's "Gold Mining Operation Verification Protocol" by auditors meeting ICMI requirements; and<br><br>b. Verified as being generally consistent with Cyanide Code requirements. | | | If cyanide will be, or is, transported to and stored on-site in bags or bulk containers, or used as a chemical in any aspect of mining or mineral processing, but the site is not eligible to be certified by the ICMI, the site's cyanide management practices are:<br><br>a. Assessed at least every three years against the Cyanide Code's "Gold Mining Operation Verification Protocol" by auditors meeting ICMI requirements;<br><br>b. Verified as fully meeting the Cyanide Code requirements; and<br><br>c. All cyanide producers and transporters supplying the operation are certified as meeting the "Cyanide Production and Transport Practices" of the Cyanide Code. | ***NOTE:*** *This requirement is an alternative that applies when a site is NOT eligible to be certified by ICMI.*<br><br>*4.1.7.2.a and b align with the former 4.7.1.2.*<br><br>*4.1.7.2.c aligns with former 4.7.1.3.* |
| 4.7.1.3 | | The operating company shall demonstrate that it has taken steps to ensure that cyanide producers and transporters supplying the mining project are certified as meeting the "Cyanide Production and Transport Practices" of the Cyanide Code. | | | | |
| | | | ***4.1.8*** | | ***Mercury Management*** | *New heading* |
| 4.8.1.1 | | A mining project with a mercury emission control system shall perform a mercury mass balance that assesses and documents the amount of mercury in waste rock and ore, and the amount of mercury during or after processing that is:<br><br>a. Released to air and water;<br><br>b. Produced as by-product; and<br><br>c. Resident in tailings ponds, waste rock dumps, or other mine waste facilities. | | | 4.1.8.1 Critical Requirement<br>If mercury is present in ore, concentrates or waste materials , the ENTITY has a system in place to ensure that:<br>a. At least annually, a mercury mass balance is conducted and documented by competent professionals ;<br>b. Mercury recovered from mercury emission control systems or produced as a by-product is only sold for an end-use listed in Annex A (Products) or Annex B (Processes) of the Minamata Convention on Mercury, subject to the appropriate phase-out dates ;<br>c. Mercury recovered is not sold or given away, either directly or indirectly, to individual/s or ENTITY/ies engaged in artisanal or small-scale mining;<br>d. Mercury wastes from mercury emission control systems are sent to a regulated repository that accepts mercury wastes;<br>e. If mercury wastes from mercury emission control systems are stored on-site or disposed with tailings or with other materials, prior to being permanently disposed of, mercury wastes undergo conversion and, where intended to be disposed of in above-ground facilities, conversion and solidification;<br>f. If mercury wastes from mercury emission control systems are stored on-site or disposed with tailings or with other materials, this only occurs if a risk-based evaluation of the storage or disposal of mercury waste demonstrates that the risk of long-term air or water pollution is low, and disposal occurs in fully lined facilities using synthetic liners that have a permeability of 10-9 cm/sec or less and a leachate collection system;<br>g. If mercury wastes from mercury emission control systems are stored on-site or disposed with tailings or with other materials, sampling for mercury in groundwater and surface water is integrated | *Combines requirements from former Chapter 4.8 – 'Mercury Management' of the 2018 Mining Standard. We are proposing to delete that chapter and incorporate its expectations into other relevant IRMA chapters. Given that mercury can be a hazardous element, some requirements have been added into this chapter.*<br><br>*a. aligns with former 4.8.1.1, but provides more specificity on the frequency of updating of the mass balance.*<br><br>*b. aligns with former 4.8.2.2.c.*<br><br>*c. aligns with former 4.8.2.2.b.*<br><br>*d. clarifies intent of 4.8.2.3*<br><br>*e. aligns with Article 13 of Regulation (EU) 2017/852 of the European Parliament and of the EU Council (and therefore with associated Battery Regulations, EU CSDDD etc...)* |
| 4.8.2.2 | Critical | Mercury recovered from mercury emission control systems:<br><br>a. Shall not be stored on-site or disposed with tailings after removal;<br><br>b. Shall not be sold or given away either directly or indirectly to an entity engaged in artisanal or small-scale mining; and<br><br>c. Shall be sold only for an end use listed in Annex A (Products) or Annex B (Processes) of the Minamata Convention on Mercury or sent to a regulated repository for mercury wastes. | 4.1.8.1 | Critical | | |

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| 4.8.2.3 | Critical | As an exception to 4.8.2.2.a, wastes from mercury emission control systems that contain mercury may be stored or disposed of on-site only if:<br><br>a. A risk-based evaluation of the on-site storage or disposal of mercury waste demonstrates that the risk of long-term contamination is low; and<br><br>b. Disposal occurs in fully lined tailings storage facilities using synthetic liners that have a permeability of 10-9 cm/sec or less. | | | into the monitoring program for water in Chapter 4.3 , and corresponding environmental impact monitoring is carried out in locations that are most likely to promote methylation , at a frequency that is appropriate and commensurate to the risks and potential impacts.; and<br>h. If mercury wastes from mercury emission control systems are stored on-site or disposed with tailings or with other materials, mercury monitoring is included in the air monitoring program plan in Chapter 4.5. | *f. aligns with former 4.8.2.3.*<br><br>*The need for sampling and monitoring (g. and h.) of mercury in groundwater, surface water and air was covered in the former 4.8.3.2 and 4.8.3.3 (in particular 4.8.3.2.b and c, and 4.8.3.3.e).*<br>*g. and h. now reference other IRMA chapters, rather than requiring a standalone mercury monitoring program.* |
| 4.8.3.2 | | The mercury monitoring plan shall address:<br><br>a. Potential public health impacts (e.g., food source and blood level mercury);<br><br>b. Environmental impacts monitoring (e.g., fish tissue and stream sediment mercury levels), including locations that are most likely to promote methylation, such as still waters, wetlands, and anaerobic sediment; an<br><br>c. Mercury air emission monitoring, which shall be conducted at least annually for direct releases to the atmosphere from an autoclave, roaster, carbon kiln, refining furnace, or other thermal process that has a mercury emission control system. | | | | |
| 4.8.3.3 | | The mercury monitoring plan shall include the monitoring of:<br><br>a. The quantity of mercury released to air including fugitive emissions (to the extent technologically and economically feasible with air monitoring equipment);<br><br>b. The quantity of mercury released to water, including the forms of mercury;<br><br>c. The amount of mercury captured in a mercury emission control system; and<br><br>d. The amount of by-product mercury produced (including the mercury captured by a mercury emission control system); and<br><br>e. Methyl mercury and sulfate, if mines have a mercury emission control system. In such cases, sampling shall be regularly conducted in wetlands and water bodies on or near the mine site. | | | | |
| | | | ***4.1.9*** | | ***Monitoring and Evaluation*** | *New heading* |

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| 4.1.5.5 | | The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:<br><br>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters;<br><br>b. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices;<br><br>c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility;<br><br>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and<br><br>e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. | 4.1.9.1 | | To monitor and evaluate the effectiveness and appropriateness of its measures to prevent, mitigate, and remediate all risks and impacts from hazardous wastes the Entity, at least monthly:<br><br>a. Inspects and documents the condition and safety of: 1) areas where hazardous wastes are handled, mixed, stored or disposed of, on-site and at associated facilities; 2) storage and conveyance structures for hazardous wastes; and 3) secondary hazardous wastes containment systems;<br><br>b. Tests and documents the functioning of alarms and sumps for hazardous wastes; and<br><br>c. Tracks and documents the effectiveness of any mitigation measures or controls (engineered or others) meant to prevent the release of hazardous wastes into the workplace or the environment. | *Inspection and monitoring requirements for wastes were addressed in former 4.1.5.5.c, but the requirements focused only on mine waste facilities, not all hazardous wastes.*<br><br>*4.1.8.1.a and b provide more specificity than former 4.1.5.5.c.*<br><br>*4.1.8.1.c was covered in the former 4.1.5.6.b.* |
| 4.1.5.6 | Critical | On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:<br><br>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);<br><br>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);<br><br>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and<br><br>d. Inform the management review to facilitate continual improvement (see 4.1.5.8). | | | | |

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| | | | 4.1.9.2 | | To monitor and evaluate the effectiveness and appropriateness of its measures to prevent, mitigate, and remediate all risks and impacts from hazardous materials the Entity, at least monthly:<br><br>a. Inspects and documents the condition and safety of: 1) areas where hazardous materials are handled, mixed, stored or disposed of, on-site and at associated facilities; 2) storage and conveyance structures for hazardous materials; and 3) secondary hazardous materials containment systems;<br><br>b. Tests and documents the functioning of alarms and sumps for hazardous materials; and<br><br>c. Tracks and documents the effectiveness of any mitigation measures or controls (engineered or others) meant to prevent the release of hazardous materials into the workplace or the environment. | *Monitoring and evaluation of hazardous materials is new. It reflects and mirrors the expectations for the monitoring and evaluation of hazardous wastes (see 4.1.8.1).* |
| | | | 4.1.9.3 | | The monitoring and evaluation processes, both for hazardous wastes and hazardous materials:<br><br>a. Encourages and facilitates joint monitoring with workers and their representatives, in a manner that is inclusive of different seniority levels, genders, and any potentially underserved and/or marginalized workers;<br><br>b. Encourages and facilitates joint monitoring 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; and<br><br>c. If members of affected communities agree to participate in joint monitoring, the Entity offers to cover, in full or in part, costs related to participation in monitoring and review of the monitoring program, including for independent experts, and a mutually-acceptable agreement for covering costs is developed. | *This is a new requirement.* |
| | | | ***4.1.10*** | | ***Continuous Improvement*** | ***New heading*** |

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| 4.1.5.8 | | The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:<br><br>a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and<br><br>b. Be documented, and the results reported to an accountable executive officer. | 4.1.10.1 | | At least annually, but without undue delay after a significant change, the ENTITY collaborates with workers and their representatives to:<br>a. Review monitoring and evaluation results, as per Section 4.1.9;<br>b. Review any materials-related or waste-related grievances filed through its grievance mechanism/s required in Chapter 1.6 (Section 1.6.1), and any notification submitted through its whistleblowing mechanism required in Chapter 1.6 (Section 1.6.2);<br>c. Review the effectiveness of the mitigation measures implemented as per 4.1.5 and 4.1.6 (and 4.1.7 and 4.1.8 if applicable) to prevent risks related to materials and waste, including their release into the workplace or the environment;<br>d. Develop and implement time-bound corrective measures to update, if necessary , the scoping in accordance with Section 4.1.1; and characterization in accordance with Section 4.1.2;<br>e. Develop and implement time-bound corrective measures to update, if necessary , the risk and impact assessment in accordance with Section 4.1.3;<br>f. Develop and implement time-bound corrective measures to update, if necessary , its management plans, in accordance with Sections 4.1.5 and 4.1.6 (and 4.1.7 and 4.1.8 if applicable); and<br>g. Develop and implement time-bound corrective measures to update, if necessary , its monitoring and evaluation processes, in accordance with Section 4.1.9. | *Review of mine waste facilities and using the results of evaluations to assess effectiveness and inform continual improvement were addressed in former 4.1.5.8 and 4.1.5.6.*<br><br>*b. --which requires review of waste-related grievances to inform improvements to waste management-- is new*<br><br>*d. to g. expand on concepts in the former 4.1.4.1 and former 4.1.5.7. But the addition of "time-bound corrective actions," is new.*<br><br>*d. is new*<br><br>*e.: the updating of the risk assessment in was included in the former 4.1.4.1.c*<br><br>*f.: the updating of management plans is new.*<br><br>*g.: the updating of monitoring and evaluation processes was covered in former 4.1.5.7.* |
| 4.1.5.6 | Critical | On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:<br><br>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);<br><br>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);<br><br>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and<br><br>d. Inform the management review to facilitate continual improvement (see 4.1.5.8). | | | | |
| 4.1.4.1 | Critical | A risk-based approach to mine waste assessment and management shall be implemented that includes:<br><br>a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;<br><br>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;<br><br>c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and<br><br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | | | | |

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| 4.1.5.7 | | The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities. | | | | |
| 4.1.5.7 | | The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities. | 4.1.10.2 | Critical | The ENTITY has a system in place to ensure that, whenever the review process indicates that waste or materials management procedures or engineering controls are not being effective, and/or whenever an incident related to materials or waste happens, the following actions occur:<br>a. If there is an imminent risk or actual impact to human health or safety, or biodiversity, or the environment, immediate measures are implemented to remedy the situation and, if necessary, response measures outlined in emergency response plans in Chapter 2.6. and 3.2 are implemented;<br>b. If risks to human health or safety, or biodiversity, or the environment are not imminent, remedial measures are implemented as soon as possible, but no later than seven days after the issue was identified; and<br>c. The issues and/or incidents are documented and used to inform reviews and updates to hazardous waste management procedures (see 4.1.5), hazardous materials management procedures (see 4.1.6), and the managment plans related to occupational health and safety (Chapter 3.2), emergency response (Chapter 2.6), water (Chapter 4.3), or air (Chapter 4.5), as relevant. | *This is a largely a new requirement.*<br><br>*One element, the updating of waste management procedures when controls are not being effective, was covered in the former 4.1.5.7.* |
| ***4.1.7*** | | ***Stakeholder Engagement in Mine Waste Management*** | ***4.1.11*** | | ***Information-Sharing and Public Reporting*** | *Heading number and name changed* |

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| 4.1.7.4 | | If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies. | 4.1.11.1 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. Key findings of the risk and impact assessment required in 4.1.3, and all relevant Material Safety Data Sheets (MSDSs);<br>b. A summary of the mitigation measures implemented to reduce and manage wastes required in 4.1.5;<br>c. A summary of the mitigation measures to manage materials required in 4.1.6;<br>d. If applicable, a summary of the mitigation measures to manage cyanide and mercury required in 4.1.7 and 4.1.8;<br>e. Key findings of the monitoring and evaluation process required in 4.1.9 and of the review process required in 4.1.10.1;<br>f. A list of the time-bound corrective measures identified as per 4.1.10.1;<br>g. The total amounts of wastes generated over the reporting period, disaggregated by the amount that was: 1) Re-used and, where applicable, re-mined; 2) Recycled, and recovered for energy; and 3) Disposed of. | *This requirement expands on the disclosure of information to stakeholders addressed in the former 4.1.7.4 by requiring that information be publicly accessible (not only made available if requested by stakeholders, as required in the former 4.1.7.4).*<br><br>*a. is new.*<br><br>*b. to e. were substantially covered in 4.1.7.4*<br><br>*f.: the requirement to disclose the time-bound corrective actions in 4.1.10.c is new.*<br><br>*g. is new.* |
| ***4.1.1*** | | ***Policy and Governance*** | | | | *Deleted* |
| 4.1.1.1 | | The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.1.2 | | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:<br><br>a. Having the policy approved by senior management and endorsed at the Director/Governance level of the company;<br><br>b. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities;<br><br>c. Having procedures and/or protocols in place to implement the policy; and<br><br>d. Allocating a sufficient budget to enable the effective implementation of the policy. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.3.1 | | The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |

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| 4.1.3.4 | | Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.3.5 | | Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected. | | | | *No longer included in this chapter.* |
| 4.1.4.2 | | The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:<br><br>a. Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses;<br><br>b. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives;<br><br>c. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications;<br><br>d. Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative;<br><br>e. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and<br><br>f. Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management). | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.5.1 | Critical | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.5.3 | | For high-consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |

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| 4.1.5.4 | | Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling and other relevant information. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| ***4.1.6*** | | ***Independent Review of Mine Waste Management Facilities*** | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.6.1 | | The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.6.2 | | Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.6.3 | | Independent reviewers shall be objective, third-party, competent professionals. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.6.4 | | Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.6.5 | | The operating company shall develop and implement an action plan in response to commentary, advice or recommendations from an independent review, document a rationale for any advice or recommendations that will not be implemented, and track progress of the plan's implementation. All of this information shall be made available to IRMA auditors. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.7.2 | | Emergency preparedness and response plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers' representatives, and in collaboration with first responders and relevant government agencies. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |
| 4.1.7.3 | | Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. | | | | *No longer included in this chapter (see Chapter 4.2 in 2025 draft)* |

# Chapter 4.2 Tailings and Mine Waste Storage Management

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| **Req #** | Critical | **Requirement** | **Req #** | Critical | **Requirement** | ***Comment*** |
| **4.1** | | **Waste and Materials Management** | **4.2** | | **Tailings and Mine Waste Storage Management** | *New chapter title* |
| ***4.1.3*** | | ***Mine Waste Source Characterization and Impact Prediction*** | ***4.2.1*** | | ***Scoping*** | *New heading* |
| 4.1.3.1 | | The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities. | 4.2.1.1 | | A scoping process is undertaken by competent professionals to identify all proposed and existing storage, transport or disposal facilities/infrastructures for **tailings and wastes from mineral processing** that are associated with the site and its associated facilities . | *Content reflects former 4.1.3.1. (now split between processing waste and other mine waste for greater clarity and auditability; see below)* |
| 4.1.3.1 | | The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities. | 4.2.1.2 | | A scoping process is undertaken by competent professionals to identify all proposed and existing facilities or structures used to store, transport or dispose of **wastes and materials from underground and surface mines (other than tailings and wastes from mineral processing)** , associated with the site and its associated facilities, **that may have physical stability risks that could impact** the health, safety or human rights of workers and communities, or the environment. | *Content reflects former 4.1.3.1.*<br><br>*Guidance for that requirement included wastes other than tailings and wastes from mineral processing. The guidance elaborated that "Mine waste facilities ... may include, but are not necessarily limited to: open pits, pit lakes, underground mine workings, subsidence areas, waste rock facilities, tailings storage facilities, heap leach facilities, process water facilities, stormwater facilities, borrow areas for construction and/or reclamation, roads or impoundments constructed from waste rock, water treatment facilities, etc.*<br>*Mine waste facility should be interpreted to include ponds, tanks or other facilities containing brines, salts, residues or process solutions from which minerals are or have been extracted."* |

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| 4.1.3.1 | | The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities. | 4.2.1.3 | IRMA+ | IRMA+<br>A scoping process is undertaken by competent professionals to identify all other proposed and existing relevant facilities (other than tailings and waste facilities) that may have physical stability risks that could impact the health, safety or human rights of workers and communities, or the environment. | *OPTIONAL requirement*<br><br>*Content reflects intent of former 4.1.3.1. Guidance for that requirement included facilities that weren't, strictly speaking, tailings or waste facilities. For example, the guidance included facilities that are "constructed of, or come in contact with wastes that are generated or created during mining... may include, but are not necessarily limited to: open pits, pit lakes, underground mine workings, subsidence areas... heap leach facilities, process water facilities, stormwater facilities, borrow areas for construction and/or reclamation, roads or impoundments constructed from waste rock, water treatment facilities... ponds, tanks or other facilities containing brines, salts, residues or process solutions from which minerals are or have been extracted."*<br><br>*This was not systematically evaluated, and a management approaches as rigorous as with mine waste facilities goes above and beyond established best practice. (thus made OPTIONAL)* |
| ***4.1.1*** | | ***Policy and Governance*** | ***4.2.2*** | | ***Formalized Policies and Accountabilities*** | |
| 4.1.1.1 | | The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities. | 4.2.2.1 | | The ENTITY has a formal policy in place that:<br>a. Commits to the safe management of mine waste facilities, to emergency preparedness and response to tailings-related incidents, and to recovery after failure of mine waste facilities;<br>b. Is approved at the top management level of the ENTITY;<br>c. Is publicly accessible;<br>d. Has been proactively shared with all relevant employees and contractors to a degree appropriate to their level of responsibility and function; and<br>e. The ENTITY has allocated financial and staffing resources with the necessary competence to implement this policy at the level of the project/operation. | *Builds on former 4.1.1.1 and 4.1.1.2*<br><br>*c. is new* |
| 4.1.1.2 | | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:<br>a. Having the policy approved by senior management and endorsed at the Director/Governance level of the company;<br>b. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities;<br>c. Having procedures and/or protocols in place to implement the policy; and<br>d. Allocating a sufficient budget to enable the effective implementation of the policy. | | | | |
| 4.1.1.1 | | The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities. | 4.2.2.2 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Entity has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the | *Conformance with GISTM through an external third-party audit is new, but:*<br><br>*a. GISTM 8.2 partially aligns with the* |

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| 4.1.1.2 | | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:<br>[...]<br>c. Having procedures and/or protocols in place to implement the policy; and<br>d. Allocating a sufficient budget to enable the effective implementation of the policy. | | | following requirements:<br>a. GISTM Requirement 8.2, and GISTM Requirement 8.3;<br>b. GISTM Requirement 8.4 , GISTM Requirement 8.5 , and GISTM Requirement 8.6 ; and<br>c. GISTM Requirement 8.7. | *former 4.1.1.1 and 4.1.1.2.c and d.*<br><br>*b. GISTM 8.3, 8.4, 8.5 and 8.6 are new expectations.*<br><br>*c. GISTM 8.7 aligns with elements of former 4.1.6.1, 4.1.6.2 and 4.1.6.3* |
| 4.1.6.1 | | The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. | | | | |
| 4.1.6.2 | | Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body. | | | | |
| 4.1.6.3 | | Independent reviewers shall be objective, third-party, competent professionals. | | | | |
| 4.1.6.1 | | The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. | 4.2.2.3 | | The Entity has a system in place to ensure that, for any tailings facility not classified as 'Very High' or 'Extreme' but with at least one potential loss of life:<br>a. The Accountable Executive reviews the facility's risk environment, and the past and current performance of the facility management;<br>b. As a result of this review, the Accountable Executive decides whether to appoint an Independent Tailings Review Board (ITRB) (see 4.2.2.2.c);<br>c. The decision is documented. | *This requirement goes beyond GISTM 8.7 (mentioned in 4.2.2.2.c, above).*<br><br>*It draws on former 4.1.6.1, which required an independent review of all facilities (not just tailings facilities), and former 4.1.6.2, which required a review panel of at least three subject matter experts for mine waste facilities that were deemed to be high risk.* |
| 4.1.6.2 | | Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body. | | | | |
| 4.1.1.2 | | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:<br>[...]<br>b. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities;<br>[...] | 4.2.2.4 | | The ENTITY's ultimate decision-making authority (e.g. its Board of Directors, or its corporate owner/s' Board of Directors) includes at least one member with general knowledge about mine waste facilities and their associated risks. | *This is new (but extends from former 4.1.1.2.b by requiring not only responsible staff to be competent, but also individual/s at the decision-making authority level)* |
| | | | 4.2.2.5 | | For sites with any proposed or existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), the ENTITY has a system in place to ensure that the risk profiles associated with those facilities are regularly discussed at the level of its ultimate decision-making authority (e.g. its Board of Directors, or its corporate owner/s' Board of Directors, or sub-committees of those bodies) | *New requirement* |
| | | | ***4.2.3*** | | ***Interdisciplinary Knowledge Base*** | *New heading (aligned with GISTM sequence)* |

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| | | | 4.2.3.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Entity has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the GISTM Requirement 2.1. | *New requirement* |
| | | | ***4.2.4*** | | ***Characterization*** | *New heading (aligned with GISTM sequence)* |
| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);<br>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:<br>i. Analysis of petrology, mineralogy, and mineralization;<br>ii. Identification of geochemical test units;<br>iii. Estimation of an appropriate number of samples for each geochemical test unit; and<br>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.<br>[...] | 4.2.4.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the GISTM Requirements 2.2 . | *Conformance with GISTM through an external third-party audit is new, but:*<br><br>*GISTM 2.2 (site characterization, characterization of physical/chemical processes) overlaps with former IRMA requirements 4.1.3.2.a and b, and 4.1.3.4.* |
| 4.1.3.4 | | Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle. | | | | |
| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br>a. A detailed description of the facility [...]<br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | 4.2.4.2 | | For all the proposed and existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2, the Entity has a system in place to ensure that a site characterization:<br>a. Is carried out and documented by competent professionals, using credible methodologies;<br>b. Includes: 1) the proposed dimensions; 2) proposed location; 3) preliminary design; 4) operational lifespan; and 5) closure objectives; and<br>c. Includes: 6) the storage or disposal capacity; and 7) existing and planned future contents and their chemical characteristics. | *Expands on 4.1.3.2.a and e. but adds details* |

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| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);<br>[...] | 4.2.4.3 | | For all the proposed and existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2, the Entity has a system in place to ensure that the site characterization also includes and documents the following factors, and how they may influence physical stability:<br>a. Soil characteristics as follows: 1) soil type; 2) particle sizes; 3) pore water pressure; and 4) hydraulic conductivity of soils at the site;<br>b. Geology as follows: 1) seismicity; and 2) geologic and lithic subsurface conditions beneath the site and within 2 km of the site, including the thickness of each geologic unit and identification of which geologic units are water bearing;<br>c. Hydrology as follows: 1) subsurface conditions for all water-bearing zones beneath the site including maximum and minimum depths to ground water, direction of groundwater flow, hydrologic gradients, transmissivity and storativity; and 2) conditions of surface waters including average and seasonal levels and flow rates, gradients, and storage features within 2 km of the site; and<br>d. Climate-related factors, as follows: 1) mean annual temperature; 2) precipitation; 3) evaporation; 4) maximum precipitation events; 5) predicted probable maximum precipitation events ; 6) Trends in past weather and climate events, and predicted trends in future weather and climate events; and 7) Any uncertainties due to climate change for all the factors listed in a. to c. | *Expands on 4.1.3.2.a but adds details (also building on best practice as required in former 4.1.3.5)* |
| 4.1.3.5 | | Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected. | | | | |

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| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);<br>b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:<br>i. Analysis of petrology, mineralogy, and mineralization;<br>ii. Identification of geochemical test units;<br>iii. Estimation of an appropriate number of samples for each geochemical test unit; and<br>iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.<br>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;<br>d. Water balance and chemistry mass balance models for each facility; and<br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | 4.2.4.4 | | For all the proposed and existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2, competent professionals assess the relevance of the following factors to physical stability and, where relevant, include them in the site characterization:<br>a. Physical properties of the facility foundation materials, and of borrow or other materials used in construction of embankments or other features intended to provide physical stability of internally stored wastes and materials;<br>b. Physical properties and chemical properties of stored wastes and materials ; and<br>c. Actual volumes and updated estimates of future volumes of solid and liquid wastes, and the placement and/or fill plans and schedules (short and long-term) for the facility life cycle; | *Expands on 4.1.3.2.a but adds details (also building on best practice as required in former 4.1.3.5)*<br><br>*a. is new* |
| 4.1.3.5 | | Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected. | | | | |
| | | | 4.2.4.5 | | For all the proposed and existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2, competent professionals assess the need for conducting the following additional, and more detailed, geotechnical investigations and, where relevant, carry them out, document them, and include them in the site characterization: geohazard assessment, seepage analysis, stability assessment, seismic assessment, sensitivity analysis, water balance assessment, and flooding assessment. | *New requirement* |
| ***4.1.4*** | | ***Waste Facility Assessment*** | | | | *Individual steps are now broken down, see below* |
| | | | ***4.2.5*** | | ***Identification of Credible Failure Modes*** | *New heading* |
| | | | 4.2.5.1 | | For all the proposed and existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2:<br>a. A multi-disciplinary team of competent professionals identifies and documents all credible failure modes ;<br>b. This identification is informed by the facility characterization required in Section 4.2.4, and by the waste/material characterization required in Chapter 4.1 (Section 4.1.2); and<br>c. The methodology used and all identified failure modes are documented. | *New requirement*<br><br>*(this was implicit in the 2018 IRMA Standard and is also implicit in GISTM)* |

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| | | | ***4.2.6*** | | ***Facility Breach Analysis*** | *New heading (aligned with GISTM sequence)* |
| 4.1.3.3 | | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:<br>a. Detailed engineering reports, including site investigations, seepage and stability analyses;<br>[...]<br>**j. Dam breach inundation (if applicable) and waste rock dump runout analyses.** | 4.2.6.1 | | For all the proposed and existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), the following analyses are carried out and documented:<br>a. A facility breach analysis, informed by all the credible failure mode/s identified (as per 4.2.5.1), the facility characterization required in Section 4.2.4, and by the waste/material characterization required in Chapter 4.1 (Section 4.1.2);<br>b. Runout or inundation analyses for the loss of all wastes and materials (water and liquefiable solids); and<br>c. These analyses are carried out by competent professionals, using credible methodologies. | *Draws on former 4.1.3.3, espcially subrequirement j, which required a breach analysis for all facilities (not just tailings facilities) that had the potential to impact human health, safety, the environment or communities.*<br><br>*Former 4.1.5.8 also referred to the MAC Tailings Management Protocol for best practice, which recommends to "determine credible failure modes and assess what potential conditions (hazards), and their likelihood, could result in those failure modes"* |
| 4.1.5.8 | | The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:<br>a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol or a similar framework; and [...] | | | | |
| | | | 4.2.6.2 | | For all the proposed and existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), the facility breach analysis required in 4.2.6.1 determines:<br>a. The estimated physical area that may be impacted;<br>b. Flow arrival times, velocities, and depth of material deposition; and<br>c. Estimated potential and likely consequences in terms of loss of human life, impacts to public and private infrastructure and vital services, environmental impacts, and economic cost. | *New requirement, adding specific details for the breach analysis/assessment* |
| | | | 4.2.6.3 | | For all the proposed and existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), the location of the facility is mapped in relation to:<br>a. Topographical contours and geological data;<br>b. Watercourses and other surface water features, and the most recent 100-year and 500-year flood zones; and<br>c. The residential populations, individual households, and public and private infrastructure that may be affected by those credible failure modes. | *New requirement, adding specific details for the breach analysis/assessment* |
| ***4.1.7*** | | ***Stakeholder Engagement in Mine Waste Management*** | ***4.2.7*** | | ***Meaningful Engagement with Stakeholders*** | |

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| 4.1.7.1 | | Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities. | 4.2.7.1 | | For all the proposed and existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), the ENTITY:<br>a. Proactively shares with affected rights-holders and stakeholders information on the factors that may affect the physical stability of proposed and existing facilities, including information on the most recently updated identification of credible failure modes and, if relevant, the most recently updated facility breach analysis;<br>b. Building on the socio-environmental baseline and ongoing impact assessment required in Chapter 2.1, collaborates with affected rights-holders and stakeholders to identify, document, and regularly update, the potential negative impacts that physical stability failure at any of the identified mine waste facility could have on their social , cultural heritage, and environmental resources; and<br>c. To facilitate effective and meaningful engagement, and in accordance with Section 1.2.5, the ENTITY offers to provide financial assistance to affected rights-holders and stakeholders to select, hire and finance independent experts of their own choosing to advise them on risks related to the management of mine waste facilities that can affect them. | *Builds on former 4.1.7.1 and 4.1.7.4*<br><br>*c. provides provisions based on former 1.2.3.1 but specific to mine wase facility management.* |
| 4.1.7.4 | | If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies. | | | | |
| 1.2.3.1 | | 1.2.3.1. The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement.[13]<br><br>*[13] Depending on the circumstances, appropriate assistance may include providing access to training, independent experts, capacity building, etc.* | | | | |
| | | | ***4.2.8*** | | ***Consequence Classification*** | *New heading (aligned with GISTM sequence)* |
| 4.1.4.1 | | A risk-based approach to mine waste assessment and management shall be implemented that includes:<br>a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;<br>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;<br>c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and<br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | 4.2.8.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 3.3 ;<br>b. GISTM Requirement 3.4 ; and<br>c. GISTM Requirement 4.1. | *Conformance with GISTM through an external third-party audit is new, but:*<br><br>*GISTM 3.3 and 3.4 (assessing impacts and developing management plans) were addressed in former 4.1.4.1 and 4.1.5.5.*<br><br>*GISTM 4.1 (consequence failure classification) aligns with former 4.1.3.3.c.* |

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| 4.1.5.5 | | The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:<br>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters;<br>b. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices;<br>c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility;<br>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and<br>e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. | | | | |
| 4.1.3.3 | | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:<br>a. Detailed engineering reports, including site investigations, seepage and stability analyses;<br>[...]<br>**c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment;** | | | | |
| | | | 4.2.8.2 | | Full conformance with GISTM Requirements 3.3 and 3.4 (i.e. assessment, and regular update, of the social, environmental, and local economic impacts of the tailings facilities and their potential failure throughout their lifecycle, required in 4.2.8.1) is demonstrated also for all existing tailings facilities . | *GISTM Conformance Protocols only require these requirements for new tailings facilities, whereas no differentation was made in former 4.1.4.1 and 4.1.5.5.* |

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| 4.1.3.3 | | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:<br>a. Detailed engineering reports, including site investigations, seepage and stability analyses;<br>[...]<br>**c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment;** | 4.2.8.3 | | For all the proposed and existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), competent professionals:<br>a. Determine and document the consequence of failure classification of the facility by assessing the downstream conditions documented in the knowledge base, building on the potential negative impacts identified in collaboration with affected communities (as per 4.2.7.1.b), and selecting the classification corresponding to the highest Consequence Classification for each category in Annex 4.2-A;<br>b. Review each facility's failure consequence classification at least every five years, but without undue delay after a significant change; and<br>c. Review each facility's failure consequence classification whenever new or more accurate data relating to risks to the stability of the facility become available. | *Expands on former 4.1.3.3; which was not limited to tailings facilities, but also applied to "other mine waste facilities where the potential exists for catastrophic failure resulting in impacts".*<br><br>*Periodic review was required in former 4.1.3.4* |
| 4.1.3.4 | | Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle. | | | | |
| | | | ***4.2.9*** | | ***Multi-Criteria Alternatives Analysis (MCAA)*** | *New heading (aligned with GISTM sequence)* |
| 4.1.4.2 | | The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices[…] | 4.2.9.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the GISTM Requirement 3.2 . | *Conformance with GISTM through an external third-party audit is new, but:*<br><br>*GISTM 3.2 (use of multi-criteria alternatives analysis) was covered in former 4.1.4.2.* |

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| 4.1.4.2 | | The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:<br>a. Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses;<br>b. Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives;<br>c. Carry out a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications;<br>d. Assess remaining alternatives using a rigorous, transparent decision-making tool, such as Multiple Accounts Analysis (MAA) or its equivalent, that takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative;<br>e. Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and<br>f. Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management). | 4.2.9.2 | | For all the proposed and existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2:<br>a. A multi-criteria alternatives analysis (MCAA) is carried out and documented by a multidisciplinary team of competent professionals;<br>b. Each MCAA has the objective of selecting an alternative that: 1) minimizes risks to people and the environment throughout the facility life cycle, and 2) minimizes the volume of fluids and/or wastes placed in those facilities;<br>c. Each MCAA identifies minimum specifications and performance objectives for each facility throughout the facility life cycle (including closure objectives and post-closure land and water uses);<br>d. Each MCAA identifies possible alternatives for initial siting, design and management of those facilities to prevent, and if that is not possible, minimize risks from all credible failure modes and for all phases of the lifecycle of the facility;<br>e. Each MCAA includes a screening or "fatal flaw" analysis to eliminate alternatives that fail to meet minimum specifications;<br>f. Each MCAA assesses remaining alternatives using a rigorous, transparent decision-making tool, such as Multiple Accounts Analysis or its equivalent, that takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative; and<br>g. Each MCAA includes a sensitivity analysis to reduce potential that biases will influence the selection of final site locations, design specifications and facility management practices. | *Aligned with former 4.1.4.2* |
| | | | ***4.2.10*** | | ***Design Criteria*** | *New heading (aligned with GISTM sequence)* |
| 4.1.5.1 | | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | 4.2.10.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the and the GISTM Requirement 4.2 . | *Draws from the intent of 4.1.5.1, but provides a level of details that was not covered in the 2018 IRMA Standard V1.0* |
| 4.1.5.1 | | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | 4.2.10.2 | | The ENTITY systematically adopts a more conservative approach by adopting the 'Extreme' Consequence Classification external loading criteria (see the matrix provided in Annex 4.2-B-1. in Chapter Annexes), and applies this in conformance with all the relevant GISTM Requirements, for all proposed and existing tailings facilities identified as per 4.2.1.1 . | *Draws from the intent of 4.1.5.1, but provides a level of details that was not covered in the 2018 IRMA Standard V1.0*<br><br>*This approach is only one of two options proposed in GISTM (Option B1 of Requirement 4.2). Instead, in the IRMA Standard, it is the only option to obtain full conformance with this Chapter.* |

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| 4.1.5.1 | | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | 4.2.10.3 | | For all the proposed and existing mine waste facilities where one or more credible failure modes have been identified (see 4.2.5.1), if the design for the 'Extreme' Consequence Classification external loading criteria has not been implemented, the reviews of the consequence classification are conducted as follows:<br>a. Reviews draw attention to any deficiencies or non-conformities in information , in facility construction, operation, maintenance, surveillance, emergency preparedness and response plans, responses to incidents, and governance ;<br>b. Every review of a particular facility is carried out by a different independent contractor; and<br>c. Commentary, advice, and recommendations from the Dam Safety Review (DSR) are shared with the Accountable Executive. | *Draws from the intent of 4.1.5.1, but provides a level of details that was not covered in the 2018 IRMA Standard V1.0* |
| 4.1.5.1 | | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | 4.2.10.4 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 4.3, and GISTM Requirement 4.4;<br>b. GISTM Requirement 4.5, and GISTM Requirement 4.6;<br>c. GISTM Requirement 4.7, and GISTM Requirement 4.8; | *Draws from the intent of 4.1.5.1, but provides a level of details that was not covered in the 2018 IRMA Standard V1.0* |
| | | | ***4.2.11*** | | ***Robust Design Development*** | *New heading (aligned with GISTM sequence)* |
| 4.1.4.2 | | The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. . . | 4.2.11.1 | Critical | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Entity has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirements 5.1, 5.2, and 5.3;<br>b. GISTM Requirements 5.4, 5.5, and 5.6; and<br>c. GISTM Requirement 5.7. | *Conformance with GISTM through an external third-party audit is new, but:*<br><br>*GISTM 5.1 (integration of outcomes of the multi-criteria alternatives analysis) aligns with former 4.1.4.2.*<br><br>*GISTM 5.2 (robust design) aligns with the intent of former 4.1.5.1 (which was a critical requirement)*<br><br>*GISTM 5.3 (water balance and water management) aligns with former 4.1.3.2 and 4.1.3.3.i. See also former Water chapter for more detailed requirements related to water balance models and water management plans.*<br><br>*GISTM 5.4 (address all potential failure modes), GISTM 5.5 (design for each stage of construction), GISTM 5.6 (design the closure phase) and GISTM 5.7 (confirm that consequences are ALARP) are all new.* |
| 4.1.5.1 | Critical | Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP). | | | | |
| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include: . . .<br><br>d. Water balance and chemistry mass balance models for each facility. . . | | | | |

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| | | | 4.2.11.2 | | For any of the proposed and existing tailings facilities identified as per 4.2.1.1 where other measures to reduce the consequences of its credible failure mode as per the breach analysis have been exhausted, and pre-emptive resettlement cannot be avoided, the ENTITY fully meets all the applicable requirements of Chapter 2.5 (Land Acquisition, Displacement, and Resettlement) of the IRMA Standard for the given proposed or existing tailings facility . | *Cross-referencing Chapter 2.5, to ensure scoing cap/relationship; but without creating additional workload for companies and auditors.* |
| | | | ***4.2.12*** | | ***Planning, Building, and Operating Tailings Facilities*** | *New heading (aligned with GISTM sequence)* |
| 4.1.5.3 | | For high-consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide. | 4.2.12.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Entity has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 6.1 and GISTM Requirement 6.2;<br>b. GISTM Requirement 6.3, and GISTM Requirement 6.4; and<br>c. GISTM Requirement 6.5 and GISTM Requirement 6.6. | *Conformance with GISTM through an external third-party audit is new, but:*<br><br>*GISTM 6.4 (critical controls and Operations, Maintenance and Surveillance Manual and annual updates to it) was addressed in the former 4.1.5.3, 4.1.5.5 and 4.1.5.7.*<br><br>*GISTM 6.1 (building, operating and closing the facility in line with the design intent), GISTM 6.2 (QA/QC and construction vs. design intent verification), GISTM 6.3 (construction as-built report), GISTM 6.5 (formal change management system), and GISTM 6.6 (considering new and emerging technologies) are all new.* |
| 4.1.5.5 | | The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:<br>[…] | | | | |
| 4.1.5.7 | | The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities. | | | | |

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| 4.1.5.5 | | The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:<br>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters;<br>b. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices;<br>c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility;<br>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and<br>e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. | 4.2.12.2 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Operations, Maintenance, and Surveillance (OMS) Manual/s (or equivalent) include a risk management plan (or equivalent) that:<br>a. Outlines critical controls to minimize the probability and potential consequences of a facility failure to as low as reasonably practicable (ALARP)<br>b. Includes other risk controls and actions necessary for the safe operation of the facility;<br>c. Documents specific and measurable performance objectives, indicators, and performance parameters for critical controls and risk controls;<br>d. Includes a trigger action response plan (TARP), or equivalent, that describes pre-defined trigger levels for performance criteria, and actions to be taken if trigger levels are reached or exceeded ;<br>e. Assigns implementation of controls and measures to responsible staff with adequate skills and expertise, and assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. Includes clearly-defined timelines and an implementation schedule in place that specifies the expected outcomes;<br>g. Includes estimates of human resources and budget required; and<br>h. Includes a financing plan in place to ensure that funding is available for the effective implementation of the plan. | *This builds on former 4.1.5.5, to ensure specific details are included (vs higher-level GISTM approach)*<br><br>*e. to h. are new: aligned with proposed changes re. implementation of plans proposed throughout the Standard.* |
| | | | ***4.2.13*** | | ***Monitoring and Evaluation*** | *New heading (aligned with GISTM sequence)* |

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| 4.1.5.5 | | The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:<br>a. An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters;<br>b. A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices;<br>c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility;<br>d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and<br>e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. | 4.2.13.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Entity has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 7.1 , and GISTM Requirement 7.2 ;<br>b. GISTM Requirement 7.3 , and GISTM Requirement 7.4 ; and<br>c. GISTM Requirement 7.5 . | Conformance with GISTM through an external third-party audit is new, but:<br><br>GISTM 7.1 (performance monitoring program) aligns in part with 4.1.5.5.c and d; and with 4.1.5.6.<br><br>GISTM 7.2 (engineering monitoring system) aligns to some degree with 4.1.5.5.b.<br><br>GISTM 7.3 (measurable performance objectives) aligns with former 4.1.5.5.d.<br><br>GISTM 7.4 (understanding deviations from expected performance) aligns with former 4.1.5.5.c; and with 4.1.5.6.<br><br>GISTM 7.5 (reporting results) is new |
| 4.1.5.6 | Critical | On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:<br>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);<br>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);<br>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and<br>d. Inform the management review to facilitate continual improvement (see 4.1.5.8). | | | | |

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| 4.1.5.6 | Critical | On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:<br>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);<br>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);<br>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and<br>d. Inform the management review to facilitate continual improvement (see 4.1.5.8). | 4.2.13.2 | | At least annually, but without undue delay after a significant change, competent professionals evaluate the performance of all existing mine waste facilities identified as per 4.2.1.1 and 4.2.1.2 by assessing whether the performance objectives defined for each facility are being met (see 4.2.9.2.c). | Aligned with former 4.1.5.6 (specific minimum frequency is new, aligned with GISTM) |
| | | | ***4.2.14*** | | ***Engineer of Record*** | *New heading (aligned with GISTM sequence)* |
| | | | 4.2.14.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 9.1 ;<br>b. GISTM Requirement 9.2 , and GISTM Requirement 9.3 ; and<br>c. GISTM Requirement 9.4 , and GISTM Requirement 9.5 . | *New requirement* |
| ***4.1.6*** | | ***Independent Review of Mine Waste Management Facilities*** | ***4.2.15*** | | ***Ongoing Risk Assessment and Continuous Improvement*** | *New heading (aligned with GISTM sequence)* |
| 4.1.4.1 | Critical | A risk-based approach to mine waste assessment and management shall be implemented that includes:<br>a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle;<br>b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle;<br>c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and<br>d. Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). | 4.2.15.1 | | For each existing mine waste facility where one or more credible failure modes have been identified (see 4.2.5.1):<br>a. A risk assessment is carried out to evaluate the risks to human rights and the health and safety of communities and the environment from all credible failure modes identified;<br>b. It is carried out and documented by a multi-disciplinary team using a credible methodology;<br>c. It Identifies credible failure modes for which design elements and critical controls must be prioritized, and a rationale is documented;<br>d. It is updated at least every three years, but without undue delay after a significant change; and<br>e. It is informed by the collaborative identification of potential negative impacts with affected rights-holders and stakeholders required in 4.2.7.1. | *This expands on 4.1.4.1, and aligns with the GISTM Standard, but ensuring that risk assessments are not limited to tailings facilities (consistent with the IRMA 2018 approach).*<br><br>*e. expands on 4.1.7.1* |
| 4.1.7.1 | | Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities. | | | | |

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| | | | 4.2.15.2 | | For each existing mine waste facility where one or more credible failure modes have been identified (see 4.2.5.1), the ENTITY can demonstrate that:<br>a. The refinements of the design are informed by the outcome of the multi-criteria alternatives analysis and the risk assessment;<br>b. The design criteria used are appropriate to minimize risk to as low as reasonably practicable for: 1) all credible failure modes; and 2) all phases of construction over the facility life cycle and<br>c. The facility uses the flood, seismic and slope stability design criteria that are consistent with the facility's failure consequence classification. If not originally applied at existing facilities the ENTITY can demonstrate that a plan to meet the applicable criteria has been developed, has undergone independent review and is being implemented. | New requirement |
| 4.1.5.6 | Critical | On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:<br>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);<br>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);<br>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and<br>d. Inform the management review to facilitate continual improvement (see 4.1.5.8). | 4.2.15.3 | | For all the existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 10.2 , GISTM Requirement 10.3 , and GISTM Requirement 10.4 ;<br>b. GISTM Requirement 10.5 ; and<br>c. GISTM Requirement 10.6 . | Conformance with GISTM through an external third-party audit is new, but:<br><br>GISTM 10.2 (regular reviews to ensure effectiveness of Tailings Management System) aligns with 4.1.5.6, 4.1.5.8, and 4.1.6.1<br><br>GISTM 10.3 (internal audits) were mentioned in 4.1.3.3.h.<br><br>10.4 (reviews by Engineer of Record) and 10.5 (Dam Safety Reviews every five years) expand on former 4.1.6.2 and 4.1.6.3, providing greater clarity.<br><br>GISTM 10.6 (ITRB review and reporting to Accountable Executive) aligns with former 4.1.6.1 and 4.1.6.4. |
| 4.1.5.8 | | The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:<br>a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol207 or a similar framework; and<br>b. Be documented, and the results reported to an accountable executive officer. | | | | |
| 4.1.6.1 | | The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. | | | | |

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| 4.1.3.3 | | The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:...<br>[...]<br>h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report;<br>. . . | | | | |
| 4.1.6.2 | | Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities a panel of three or more subject matter experts shall comprise the independent review body. | | | | |
| 4.1.6.3 | | Independent reviewers shall be objective, third-party, competent professionals. | | | | |
| 4.1.6.4 | | Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner. | | | | |
| | | | 4.2.15.4 | | For all the existing tailings facilities identified as per 4.2.1.1, the Dam Safety Review (DSR) draws attention to any deficiencies or non-conformities in information , in facility construction, operation, maintenance, surveillance, emergency preparedness and response plans, responses to incidents, and governance . | New requirement |
| | | | 4.2.15.5 | | For all the existing tailings facilities identified as per 4.2.1.1:<br>a. Every DSR of a particular facility is carried out by a different independent contractor; and<br>b. All ITRB members, senior independent technical reviewers, and DSR contractors are objective, third-party, and competent, professionals with at least 15 years of experience in the specific area of review . | New requirement |
| 4.1.5.8 | | The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:<br>a. Align with the steps outlined in the Mining Association of Canada's Tailings Management Protocol207 or a similar framework; and<br>b. Be documented, and the results reported to an accountable executive officer. | 4.2.15.6 | | The Entity has a system in place to ensure that, for any tailings facility not classified as 'Very High' or 'Extreme' but with at least one potential loss of life:<br>a. Building on the review of the facility's risk environment, and of the past and current performance of the facility management required in 4.2.2.3, the Accountable Executive and/or the ITRB (if appointed) decides whether independent Dam Safety Reviews (DSR) should also be conducted at least every five years ; and<br>b. The decision is documented. | Aligned with former 4.1.5.8 (which was not limited to TSFs, but also other mine waste facilities with credible failure modes) |
| 4.1.6.4 | | Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner. | 4.2.15.7 | | For all the existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance | Conformance with GISTM through an external third-party audit is new, but: |

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| 2.6.2.3 | | The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum: . . .<br>j. Either:<br>i. A multi-year inflation increase in the financial surety; or<br>ii. An annual review and update of the financial surety. | | | Protocols and demonstrated full conformance with the GISTM Requirement 10.7 . | GISTM 10.7 (estimated costs for planned closure, early closure, reclamation, and post-closure are reviewed, and adequate financial capacity is available) are addressed in former 2.6.2.3, 2.6.2.4 and 2.6.4.1, (liability insurance for incidents such as tailings facility failures) was covered in former 2.5.3.1 and 2.5.3.2. |
| 2.6.2.4 | | The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report. | | | | |
| 2.6.4.1 | Critical | Financial surety instruments shall be in place for mine closure and post-closure. | | | | |
| 2.5.3.1 | | All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events. | | | | |
| | | | 4.2.15.8 | | At least every three years, the ENTITY:<br>a. Reviews its performance in demonstrating full conformance with all the GISTM Requirements, as evidenced by the results of a third-party conformance audit against the GISTM Conformance Protocols;<br>b. It develops and implements a time-bound action plan in response to all relevant commentary, advice or recommendations from this third-party audit;<br>c. It documents a rationale for any advice or recommendations that will not be implemented; and<br>d. Tracks its progress on implementing its previous time-bound action plan. | *New requirement* |
| 4.1.6.1 | | The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. | 4.2.15.9 | | For any tailings facility not classified as 'Very High' or 'Extreme' but with at least one potential loss of life, if the decision was made to appoint an Independent Tailings Review Board (ITRB), as per 4.2.2.3, the ITRB, reporting to the Accountable Executive, also provides ongoing senior independent review of the planning, siting, design, construction, operation, water and mass balance, maintenance, monitoring, performance and risk management at appropriate intervals across all phases of the tailings facilities' lifecycle (in accordance with GISTM Requirement 10.6). | Aligned with former 4.1.6.1 and 4.1.6.4 (which was not limited to certain consequence classifications) |
| 4.1.6.4 | | Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner. | | | | |
| | | | ***4.2.16*** | | ***Organizational Culture*** | *New heading (aligned with GISTM sequence)* |

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| 4.1.1.2 | | The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum: . . . [...]<br>b. Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities; | 4.2.16.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 11.1 ;<br>b. GISTM Requirement 11.2 , and GISTM Requirement 11.3 ; and<br>c. GISTM Requirement 11.4 and GISTM Requirement 11.5 . | Conformance with GISTM through an external third-party audit is new, but:<br><br>GISTM 11.1 (educating personnel on their roles) aligns with former 4.1.1.2.b.<br><br>GISTM 11.2 (incorporating worker knowledge) is new.<br><br>GISTM 11.3 (promoting cross-functional collaboration) aligns with former 4.1.5.4.<br><br>GISTM 11.4 (incorporating lessons learned) aligns with the intent of former 4.1.5.7.<br><br>GISTM 11.5 (rewarding employees and contractors who report problems) is new. |
| 4.1.5.4 | | Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling and other relevant information. | | | | |
| 4.1.5.7 | | The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities. | | | | |
| | | | ***4.2.17*** | | ***Information-Sharing and Public Reporting*** | *New heading (aligned with GISTM sequence)* |
| 1.2.4.1 | | Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information. | 4.2.17.1 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the Entity has undertaken a third-party conformance audit against the GISTM Conformance Protocols and demonstrated full conformance with the following requirements:<br>a. GISTM Requirement 15.1;<br>b. GISTM Requirement 15.2; and<br>c. GISTM Requirement 15.3. | Conformance with GISTM through an external third-party audit is new, but:<br><br>GISTM 15.1 (disclosure) is significantly more specific and proactive than the disclosure requirements for tailings in the IRMA Standard.<br><br>GISTM 15.2 (responding to information requests) was addressed in former 1.2.4.1, 1.2.4.2 and 1.2.4.4.<br><br>GISTM 15.3 (participating in global transparency inititaives related to tailings facilitites) is not addressed in the 2018 IRMA Standard. |
| 1.2.4.2 | | If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested. | | | | |
| 1.2.4.4 | | If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information. | | | | |
| 4.1.7.1 | | Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities. | 4.2.17.2 | | The ENTITY:<br>a. Regularly reviews its stakeholder engagement plan (see 1.2.2) to identify and/or develop engagement activities related to mine waste facility management and monitoring, that are commensurate with the level of risks associated with its mine waste facilities;<br>b. At least annually, meets with affected rights-holders and stakeholders that are significantly at risk from one or more credible failure modes to report on the management, and surveillance and monitoring of mine waste facilities, as well as on the findings from independent reviews (where applicable) ;<br>c. Provide them an opportunity to give feedback on the ENTITY's management of mine waste facilities; | This builds on former 4.1.7.1 and 4.1.7.4 but adds more details.<br><br>a. c. and d. are new |

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| 4.1.7.4 | | If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies. | | | d. Proactively shares with them information about how their feedback was taken into account to inform continuous improvement in the management of mine waste facilities; and<br>e. Meets with other affected rights-holders and stakeholders (that are not significantly at risk) to share information about the management, and surveillance and monitoring of mine waste facilities, at a frequency that is commensurate with the level of risks associated as well as upon request from those rights-holders or stakeholders (see 1.2.3 - Processes for Sharing Information). | |
| | | | 4.2.17.3 | | For all the proposed and existing tailings facilities identified as per 4.2.1.1, the ENTITY makes publicly accessible an updated version, and maintains publicly accessible all previous versions of:<br>a. The findings and recommendations of the third-party conformance audit it undertook against the GISTM Conformance Protocols;<br>b. Its rationale for any advice or recommendations that will not be implemented; and<br>c. At least annually, a report on its progress on implementing the time-bound action plan required in 4.2.15.8. | New requirement |
| 1.2.4.1 | | Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information. | 4.2.17.4 | | In accordance with 1.2.3, the ENTITY ensures that any request from affected rights-holders and stakeholders to obtain additional information or reports related to mine waste facilities will be met in a timely and effective manner. | This is aligned with 1.2.4.1 to 1.2.4.4 (ensuring it is not limited to TSFs, but also mine waste facilities more generally; vs GISTM). |
| 1.2.4.2 | | If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested. | | | | |
| 1.2.4.4 | | If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information. | | | | |
| | | | ***4.2.18*** | | ***Physical Stability Management of Other Facilities*** | *New heading (Optional section)* |

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| | | | 4.2.18.1 | IRMA+ | For all the proposed and existing facilities that may have physical stability risks, other than tailings and waste facilities , identified as per 4.2.1.3, competent professionals characterized them, to inform a detailed analysis of physical stability risks, as follows:<br>a. The proposed or actual: 1) dimensions, 2) location, 3) design, 4) operational lifespan, and 4) closure objectives are documented for each facility, and if relevant, the proposed or actual: 5) storage or disposal capacity, 6) contents and their chemical characteristics ;<br>b. Key environmental factors that may influence the physical stability of proposed and existing facilities are documented by competent professionals, including documentation of any uncertainties due to climate change ; and<br>c. The location of all facilities with physical stability risks are mapped in relation to: 1) Topographical contours; 2) Geological data; 3) Watercourses and other surface water features; and 4) The most recent 100-yr and 500-yr flood zones; | *New OPTIONAL requirement* |
| | | | 4.2.18.2 | IRMA+ | Building on 4.2.1.3 and 4.2.18.1, a multi-disciplinary team of competent professionals identifies all credible failure modes for each proposed and existing facilities other than tailings and waste facilities identified. | *New OPTIONAL requirement* |
| | | | 4.2.18.3 | IRMA+ | Building on 4.2.18.1 and 4.2.18.2, a multi-disciplinary team of competent professionals determines the failure consequence classification (or equivalent) for each proposed and existing facilities other than tailings and waste facilities where one or more credible failure modes have been identified, based on the matrix provided in Annex 4.2-A (see Chapter Annexes). | *New OPTIONAL requirement* |
| | | | 4.2.18.4 | IRMA+ | Building on 4.2.18.1, 4.2.18.2 and 4.2.18.3, the ENTITY has systems in place to manage all proposed and existing facilities other than tailings and waste facilities where one or more credible failure modes have been identified, in accordance with Sections 4.2.3 to 4.2.17 (but adapted to these non-waste facilities). | *New OPTIONAL requirement* |

# Chapter 4.3 Water Management

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **4.2** | | **Water Management** | **4.3** | | **Water Management** | |
| ***4.2.2*** | | ***Site Characterization and Prediction of Potential Impacts*** | ***4.3.1*** | | ***Baseline/Background Data*** | *Heading changed* |
| 4.2.2.1 | | The operating company shall gather baseline or background data to reliably determine:<br><br>a. The seasonal and temporal variability in:<br><br>i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwaters that may be affected by the mining project;<br><br>ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwaters) that may be affected by the mining project; and<br><br>b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project. | 4.3.1.1 | | Pre-impact data on baseline or background water quality and quantity are gathered by competent professionals as follows:<br>a. Data are gathered in sufficient detail to reliably determine the sources of water contamination related to the site and its associated facilities, and the changes in water quantity or quality that are unrelated to the site and its associated facilities ;<br>b. For new operations at brownfield sites, the existing background water quantity and quality data are also determined ;<br>c. Data include seasonal and temporal variability in the physical and chemical conditions of surface waters, natural seeps/springs and groundwaters that could be affected by the site and its associated facilities, including baseline/background concentrations of the comprehensive suite of parameters in IRMA Water Quality Criteria by End-Use Tables (See Annex 4.3-A) including weak acid dissociable cyanide (if cyanide is used or proposed to be used at the site or its associated facilities) ;<br>d. Data include seasonal and temporal variability in the physical and chemical conditions of surface waters, natural seeps/springs and groundwaters that could be affected by the site and its associated facilities, including field parameters , measured at the time of baseline/background sampling; and<br>e. Data include seasonal and temporal variability in flows, levels, and presence, of surface waters, natural seeps/springs and groundwaters that could be affected by the site and its associated facilities. | *Expands on former 4.2.2.1, adding details to clarify expecations associated with the physical and chemical conditions to be studied.*<br><br>*Deleted biological conditions from former 4.2.1.1.a, as the biodiversity baseline is developed in chapter 4.5.* |
| ***4.2.2*** | | ***Water Management Context and Collaboration at the Local and Regional Level*** | ***4.3.2*** | | ***Scoping*** | *Heading changed* |
| 4.2.1.1 | | The operating company shall identify water users, water rights holders and other stakeholders that may potentially affect or be affected by its mine water management practices. | 4.3.2.1 | | Building on 1.3.2 and 2.1.3, a scoping process is undertaken by competent professionals to identify all water users, water rights holders, community members, and other stakeholders (hereinafter referred to as “affected stakeholders”) that may potentially affect or be affected by the ENTITY’s water use and water management practices. | *Content largely unchanged* |

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| 4.2.2.2 | | The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:<br><br>a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and<br><br>b. The mine's use of water, and any mining activities that may affect water quantity. | 4.3.2.2 | | Building on 1.3.2 and 2.1.3, a scoping process is undertaken by competent professionals, in collaboration with affected stakeholders, to identify:<br><br>a. How water resources that may be affected by the project/operation are currently being used and how they may be used in the future;<br><br>b. Other receptors potentially affected by the project/operation's impacts on water quality, quantity, or availability; and<br><br>c. Water-related concerns, challenges, and opportunities that exist at the local and regional levels. | *Scoping requirement from former 4.2.2.2 includes collaboration with stakeholders. Former 4.2.1.2 and 4.2.1.3 incorporated into 4.3.2.2.a.*<br><br>*4.3.2.2.b expands on former 4.2.1.2 (identification of current and potential future uses of water) by adding the term "receptors".*<br><br>*Reference in former 4.2.1.3 to 'positively contributing to water stewardship' now in 4.3.6.5.a.* |
| 4.2.1.2 | | The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices. | | | | |
| 4.2.1.3 | | The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels, and shall take steps to contribute positively to local and regional water stewardship outcomes. | | | | |
| 4.2.2.2 | | The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:<br><br>a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and<br><br>b. The mine's use of water, and any mining activities that may affect water quantity. | 4.3.2.3 | | A scoping process (or equivalent) is undertaken by competent professionals to identify the activities of the site and its associated facilities that may pose risks or have impacts on water quality. This process considers :<br>a. Direct, indirect, and cumulative, risks and impacts on water quality, including sedimentation risks, from planned discharges or unplanned releases of contaminants of potential concern (COPCs);<br>b. Facilities for storing or disposing of tailings or mine waste , and other types of waste , if any, including risks and impacts related to facility failures and catastrophic releases (see Chapter 4.2);<br>c. Any mining and/or mineral processing facilities and activities ; and<br>d. If any, evaporation ponds, sedimentation ponds, industrial stormwater retention/detention ponds, pregnant and barren solution ponds, and brine ponds. | *4.3.2.3 and 4.3.2.4 separate out water quality and water quantity into separate requirements (considered together in former 4.2.2.2).*<br>*Clarified that scoping of risks/impacts include that may be direct, indirect or cumulative.*<br><br>*Sub-requirements offer more specificity relating to components to be considered in scoping.* |

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| | | | 4.3.2.4 | | A scoping process (or equivalent) is undertaken by competent professionals to identify the activities of the site and its associated facilities that may pose risks or have impacts on water quantity and availability. This process considers :<br>a. Direct, indirect, and cumulative, risks and impacts on water quantity and availability, including groundwater levels, surface water flows, natural seep/spring flows, or environmental flows ;<br>b. The use, diversion and discharges of water from the site and its associated facilities;<br>c. If any, activities such as groundwater extraction or pumping that may affect water resources; and<br>d. If any, the presence of open pits, underground workings, other mine facilities, waste facilities, water and brine impoundments, water and brine reinjection facilities, and processing facilities that modify runoff, groundwater flow and infiltration of precipitation. | *4.3.2.3 and 4.3.2.4 separate out water quality and water quantity into separate requirements (considered together in former 4.2.2.2).*<br><br>*Sub-requirements offer more specificity relating to components to be considered in scoping.* |
| 4.2.2.3 | | Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:<br><br>a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources;<br><br>b. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels);<br><br>c. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and<br><br>d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. | 4.3.2.5 | | 4.3.2.5 A conceptual site model is developed by competent professionals , as follows:<br>a. It is developed using a credible methodology, and the methodology is documented;<br>b. It is proactively shared with affected rights-holders and stakeholders, in accordance with Section 1.2.3 .<br>c. It includes a detailed description and depiction of the physiography, geology (including structural geology such as faults), hydrology, hydrogeology, climatology, and geochemistry of the site and its associated facilities as a whole ;<br>d. It describes all potential sources of contamination related to the site and its associated facilities (identified in 4.3.2.3), and all contaminants of potential concern (see Chapter 4.1); and<br>e. It describes what is known about site-wide contaminant release, transport, pathways between sources and receptors, and fate of contaminants along pathways and in receptors for the site and its associated facilities as a whole . | *Requirement for a conceptual site model taken from former 4.2.2.3, and also draws on material related to conceptual modes in Chapter 4.1--Waste management (requirement 4.1.3.2).*<br><br>*The requirement that it be based on credible methodologies adaptation of former 4.2.2.4 expectations that models be consistent with industry best practices.*<br><br>*The "proactive sharing" of the conceptual site model with affected stakeholders is new.* |
| 4.2.2.4 | | Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected. | | | | |

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| 4.1.3.2 | | The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:<br><br>a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);. . .<br><br>c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;<br><br>d. Water balance and chemistry mass balance models for each facility; and<br><br>e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants. | | | | |
| ***4.2.2*** | | ***Site Characterization and Prediction of Potential Impacts*** | ***4.3.3*** | | ***Risk and Impact Assessment*** | *New heading* |
| | | | 4.3.3.1 | Critical | Building on 4.3.2, where potential sources of direct, indirect, and cumulative risks or impacts on water quality and/or water quantity are identified, a risk and impact assessment is carried out and documented by competent professionals, in collaboration with affected rights-holders and stakeholders, to identify and assess, for each identified risk and impact :<br>a. The level of risk posed to, and the magnitude of impact on, human health and safety, and the environment;<br>b. The level of risk posed to, and the magnitude of impact on, current and future uses of water; and<br>c. This risk and impact assessment uses a credible methodology, and the methodology used is documented. | *This was not explicitly included in the 2018 IRMA Standard, but an assessment of risks/potential impacts on water should have been done as part of the ESIA. We are clarifying here that if it this was not done at the appropriate time, it needs to be done post-ESIA to ensure that all risks are assessed, to understand the potential consequences related to the risks, and to determine if mitigation measures are required to prevent or mitigate the risks to water quality and quantity.* |

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| 4.2.2.3 | | Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:<br><br>a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources;<br><br>b. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels);<br><br>c. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and<br><br>d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. | 4.3.3.2 | | This risk and impact assessment is informed by the use of the following conceptual and numeric models:<br>a. A conceptual site model (required in 4.3.2.5), and conceptual models for facilities ;<br>b. A numeric water balance model for the site as a whole and for each facility that poses a risk to water (as identified in 4.3.2.3) that: 1) Predicts expected changes in water inflows and outflows (e.g., dewatering rates, water use amounts and sources, treated water discharges) and water volumes stored on-site in facilities (e.g., in supernatant ponds, water management ponds, water in pits) related to the project/operations; 2) Takes into account the probable maximum precipitation event; low, average, and high precipitation years; and climate change effects on temperature and precipitation using the most reliable, recent, and relevant climate change projections; 3) Clearly identifies model assumptions, inputs, and uncertainty; and 4) Estimates the effects of water management on groundwater levels and stream/spring flows;<br>c. Hydrogeochemical and hydrogeological models, to predict or quantify potential impacts to water resources during all phases of the operation's life cycle (from construction through post-closure) . These models: 1) Clearly identify model assumptions, inputs, and uncertainty; 2) Predict changes in stream flows and groundwater levels at points of compliance; and 3) Estimate concentrations of COPCs at points of compliance; and<br>d. These models are developed by competent professionals using credible methodologies, and the and the methodologies used are documented. | *a. is former 4.2.2.3.a but adds explicit reference to facilities*<br><br>*b. expands upon former 4.2.2.3.b, drawing in additional information from former guidance to 4.2.2.3*<br><br>*c. expands on former 4.2.2.3.c*<br><br>*Former 4.2.2.3.d now addressed in 4.3.3.3 and 4.3.3.4 below.* |
| | | | 4.3.3.3 | | If, at any time during project development or operations, the concentrations of contaminants in water resource receptors are predicted to exceed baseline/background water quality or IRMA water quality criteria by end-use:<br>a. The risk and impact assessment is carried out as per 4.3.3.1 to evaluate whether source control or other effective mitigation measures will be required to mitigate impacts on water quality during operations and/or closure and post-closure ;<br>b. This evaluation uses a credible methodology, and the methodology used is documented. | *Expands on former 4.2.2.3.d, drawing in additional information from former guidance to 4.2.2.3.* |

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| | | | 4.3.3.4 | | If, at any time during project development or operations, the potential exists for long-term acid rock drainage or contaminant or metal leaching (see Chapter 4.1) , the risk and impact assessment is carried out as per 4.3.3.1 to:<br>a. Estimate the needed timing, volume, and duration of long-term water treatment, using the results from the water balance and water quality models;<br>b. Evaluate the potential consequences to human health and livelihoods from a failure in long-term water treatment facilities;<br>c. Evaluate the potential consequences to protected and conserved areas, biodiversity and ecosystem services from a failure in long-term water treatment facilities; and<br>d. These evaluations use credible methodologies, and the methodologies used are documented. | *This requirement expands former 4.2.2.3.d, and adds additional clarity regarding what is included in the risk assessment.*<br><br>*4.3.3.4.a was previously included in Guidance (see Means of Verification for 4.2.2.3.d).*<br><br>*4.3.3.4.b and c add new expectations regarding what potential consequences need to be identified and evaluated in the risk assessment. Understanding the potential consequences of a water treatment failure is important information to share with stakeholders as they evaluate any project that will include long-term water treatment (as per Section 4.3.4).* |
| | | | *4.3.3.5* | ***IRMA+*** | *If, at any time during project development or operations, the availability of water is predicted to fall behind baseline/background water quantity or any minimum acceptable level defined in collaboration with affected users and stakeholders , the risk and impact assessment is carried out as per 4.3.3.1 to evaluate whether other effective mitigation measures will be required to mitigate impacts on water quantity during operations and/or closure and post-closure.* | *New optional requirement, to mirror 4.3.3.3 but for water quantity* |
| | | | ***4.3.4*** | | ***Long-Term Water Treatment*** | |

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| 2.6.6.1 | | Long-term water treatment shall not take place unless:<br><br>a. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and<br><br>b. The operating company funds an engineering and risk assessment that:<br><br>i. Is carried out by an independent third-party:<br><br>ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods;<br><br>iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms;<br><br>iv. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and<br><br>v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion. | 4.3.4.1 | | If the need for long-term water treatment is predicted (as per 4.3.3.4) for any project or activity proposed to become operational after June 2018, the ENTITY ceases to pursue the proposed project or activity, unless all the following conditions are fully met:<br>a. The methodology, assumptions, and findings of the risk and impact assessment have been discussed with affected stakeholders, sufficiently in advance of decision-making, in accordance with Chapter 1.2;<br>b. The methods and indicators for gauging community support developed and monitored in accordance with Chapter 2.4 have demonstrated a high and diverse level of support to the proposed project or activity amongst affected communities; and<br>c. If Indigenous Peoples whose rights or interests have been or may be directly or indirectly affected by any of the proposed or existing project or activity have been identified (as per 1.2.1.2. and 1.3.2.3), the ENTITY has obtained their Free, Prior, and Informed Consent for the proposed project or activity (as per Chapter 2.2). | *Formerly 2.6.6.1 in Chapter 2.6 - Planning and Financing Reclamation and Closure - as it relates to issues that would need to be addressed during post-closure; moved here to keep all of the water-related requirements together.*<br><br>*4.3.4.1.a aligns with 2.6.6.1.b.v.*<br><br>*b. is a new sub-requirement, which draws on the intent of chapter 2.3, which requires entities to work towards achieving and maintaining a high level of community support*<br><br>*c. is a new sub-requirement added to several chapters to ensure adequate attention paid to Indigenous Peoples; however, it does not require additional actions by entities, but rather it is a matter of cross-scoring between Chapter 2.2 and this chapter.* |
| 2.6.6.2 | | If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated. | 4.3.4.2 | | For any project or activity proposed to become operational after June 2018 where the need for long-term water treatment is predicted and all the conditions in 4.3.4.1 have been fully met, or for activity that became operational before June 2018 where long-term water treatment has been identified or is predicted, and if the ENTITY decides to pursue the project/activity:<br>a. An action plan (or equivalent) including all the practicable steps that can, and will be, taken to minimize the volume of water to be treated is developed and implemented by competent professionals;<br>b. The ENTITY maintains estimates of human resources and budget required, and has a financing plan in place, to ensure that funding is available for the effective implementation of this action plan, including to construct, operate and maintain an effective water treatment plant ; and<br>c. The ENTITY ensures these estimated costs are calculated and included in the detailed determination of the estimated costs of reclamation and closure, and post-closure measures and activities in accordance with Section 2.7.2 . | *a. is from former 2.6.6.2*<br><br>*b. and c. reflect Standard-wide changes to expectations for clear resourcing and implementation considerations in management plans* |
| ***4.2.4*** | | ***Monitoring and Adaptive Management*** | ***4.3.5*** | | ***Water Monitoring Program*** | *New heading* |

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| 4.2.4.1 | Critical - a through e only | The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:<br><br>a. Establish a sufficient number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics);<br><br>b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics;<br><br>c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics;<br><br>d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;<br><br>e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and<br><br>f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables. | 4.3.5.1 | | A water monitoring program is developed and implemented by competent professionals to monitor effects on water quality and quantity. The monitoring program includes a sampling plan (or equivalent) that:<br>a. Is consistent with practices listed in Annex 4.3-B ;<br>b. Includes sample collection, handling and transportation protocols, sample hold times, analysis, quality assurance/quality control methods , and reporting requirements;<br>c. Includes sufficient monitoring locations at sites unaffected by the project (baseline locations) and at sites potentially affected by the project (points of compliance) to provide reliable data on changes to water quantity and quality conditions ; and<br>d. Collection of water quality and quantity samples on a frequent enough basis to account for seasonal and temporal fluctuations, storm events, extreme events, and operational upset conditions that may cause changes in water quality or quantity . | *4.3.5.1 expands on former 4.2.4.1.*<br><br>*4.3.5.1. b. is a new sub-requirement, but it aligns with 4.2.4.1 (the need to use credible methods that will allow for the reliable detection of changes in water characteristics);*<br><br>*4.3.5.1.c. is from former 4.2.4.1.a*<br><br>*4.3.5.1.d. expands on former 4.2.4.1.b*<br><br>*Former 4.2.4.1.c is now included in 4.3.6.2.b.*<br><br>*Former 4.2.4.1.d is now 4.3.5.3.* |
| 4.2.4.2 | | Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis. | 4.3.5.2 | | The monitoring program includes an analysis plan (or equivalent) that:<br>a. Is consistent with practices listed in Annex 4.3-B;<br>b. Includes analysis, at the same frequency as in 4.3.5.1.d, of water quality samples for field parameters and all COPCs , including, if applicable, cyanide and mercury ; and<br>c. Analysis, at the same frequency as in 4.3.5.1.d, of water quality samples in laboratories using equipment capable of detecting contaminants at levels below the values in the relevant IRMA Water Quality Criteria by End-Use Tables (see Annex 4.3-A). | *Asks for an analysis plan to be part of the monitoring program.*<br><br>*4.3.5.2.b. expands on former 4.2.4.2 by clarifying what parameters need to be included in the regular analyses (as opposed to less frequent comprehensive analysis addressed in 4.3.5.2.c).*<br><br>*4.3.5.2.c. is former 4.2.4.1.f.* |
| | | | 4.3.5.3 | | Besides any regular sampling and analysis required in 4.3.5.1 and 4.3.5.2, comprehensive sampling and analysis of the full suite of parameters in relevant IRMA Water Quality Criteria by End-Use Tables (see Annex 4.3-A) at points of compliance is conducted every five years, at a time of year when concentrations are expected to be the highest, to determine if unanticipated contaminants may be present . | *4.3.5.3 expands on former 4.2.4.2 by clarifying the frequency of comprehensive sampling (beyond those required in 4.3.5.2.b). The reference to five years was contained in Guidance for former 4.2.4.2.* |

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| 4.2.4.1 | Critical - a through e only | The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall: . . .<br><br>d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities; . . . | 4.3.5.4 | | If relevant, the monitoring program includes sampling of the water quality of, and documentation of the quantity of, mine-influenced waters destined for use by external third-party entities. | *This was former 4.2.4.1.d.* |
| ***4.2.3*** | | ***Prevention and Mitigation of Impacts to Water*** | ***4.3.6*** | | ***Adaptive Management Plan*** | *New heading* |
| 4.2.3.1 | | The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy. | 4.3.6.1 | | Building on 4.3.3, and informed by the tools required in 4.3.3.2, an adaptive management plan for water (or equivalent) is developed and documented by competent professionals, to prevent, mitigate, and remediate all the risks impacts on water quality, and on water quantity and availability, identified as per Section 4.3.3. The plan includes mitigation measures that:<br>a. Regarding water quality, strictly align with the mitigation hierarchy, to prioritize source control and other measures that prevent or avoid the use or generation of contaminants, and/or measures that prevent of avoid the release of contaminants, including increased sediment load, relative to baseline conditions risk ; and<br>b. Regarding water quantity and availability, strictly align with the mitigation hierarchy, to prioritize measures that avoid the use, diversion or extraction of fresh water, and/or measures that avoid activities that adversely affect water resources and the protected and conserved areas, biodiversity and ecosystem services that they support . | *This requirement expands on 4.2.3.1, which addresses use of mitigation hierarchy to evaluate options to address potential and actual impacts on water qualtiy and quantity.* |
| 4.2.4.4 | Critical | The operating company shall develop and implement an adaptive management plan for water that:<br><br>a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and<br><br>b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion. | 4.3.6.2 | | The adaptive management plan:<br>a. Identifies potential water quality/quantity effects that could occur at monitoring locations, based on the risk and impact assessment (see 4.3.3);<br>b. Identifies key water quality and quantity indicators that will best characterize the potential effects;<br>c. Includes trigger levels for water quality and quantity to provide early warning of negative changes in water characteristics;<br>d. Includes general responsive (adaptive management) measures to be taken to confirm the exceedance of IRMA Water Quality Criteria (see 4.3.5.2) or of a legal or other threshold, or if a trigger level is reached, together with estimated timelines for completion of these measures ;<br>e. Assigns implementation of measures to responsible staff with adequate skills and expertise;<br>f. Assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>g. Has an implementation schedule in place, and specifies annual, or more frequent, reviews of the effectiveness of the measures | *Requirement 4.3.6.2 aligns with 4.2.4.4, and expands on former 4.2.4.5, which addressed effectiveness evaluation and review.*<br><br>*b rephrases former 4.2.4.4.a.*<br><br>*c incorporates component of former 4.2.4.4.b that asks for development of indicators and triggers*<br><br>*d. incorporates content from former 4.2.4.4.b*<br><br>*e, f, h, and i are new sub-requirements added to align with* |

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| 4.2.4.5 | | Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes. | | | implemented;<br>h. Maintains estimates of human resources and budget required; and<br>i. Includes a financing plan in place, to ensure that funding is available for the effective implementation of the plan. | *Standard-wide changes to expectations re: resourcing and implementation of management plans*<br><br>*g is adapted from former 4.2.4.5* |
| 4.2.4.4 | Critical | The operating company shall develop and implement an adaptive management plan for water that:<br><br>a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and<br><br>b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion. | 4.3.6.3 | | The adaptive management plan includes the creation of an action plan if exceedance of IRMA Water Quality Criteria or of other applicable thresholds is confirmed as per 4.3.6.2.d, as follows:<br>a. Determination of the areal extent of the impacts, and investigation of the cause/source of the exceedance;<br>b. Evaluation and selection of adaptive management measures developed as per 4.3.6.1, and/or development of additional or different measures that are likely to correct the exceedance ;<br>c. Development of estimated timeline and budget needed to implement the corrective action plan, and a financing plan to ensure that funding is available for effective implementation of the corrective measures;<br>d. Implementation of those corrective measures. | *Draws on intent of former 4.2.4.4.b (also critical) but addresses the specific situation where there is an exceedence of an IRMA Water Quality Criteria or other applicable threshold (e.g., a regulatory limit).*<br><br>*Specifies that in these cases, the identified actions need to be incorporated into an action plan.*<br><br>*a is new.*<br><br>*b aligns with 4.3.6.2.c.*<br><br>*c is new.* |
| 4.2.4.6 | | Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans. | 4.3.6.4 | | This adaptive management plan is developed collaboratively with affected rights-holders and stakeholders, as follows:<br>a. Options to address shared challenges and contribute positively to local and regional water stewardship outcomes are developed through collaboration with relevant affected rights-holders and stakeholders and are included in an action plan (or equivalent);<br>b. The affected rights-holders and stakeholders who participate have opportunities to review and provide feedback on draft prevention and mitigation measures, priority setting, and on draft qualitative and quantitative performance criteria, indicators, and trigger levels, that are relevant to them;<br>c. Draft and final versions of relevant documents and information are proactively shared with affected rights-holders and stakeholders in a meaningful, accessible, and culturally appropriate way (as per Section 1.2.3), clearly showing how their feedback and input was taken into account;<br>d. Effective procedures for rapidly communicating with relevant stakeholders in the event that changes in water quantity or quality occur that pose an imminent threat to human health or safety, or commercial or natural resources, are developed and tested in collaboration with affected rights-holders and stakeholders, in accordance with Chapter | *Content is not new, but language adapted to reflect Standard-wide changes to improve the quality of engagement with stakeholders and their right to participate in the creation and review of mitigation measures / management plans.*<br><br>*a. and b. address consultations with stakeholders when making management plans from former 4.2.4.6 and 4.2.3.1.*<br><br>*c. addresses stakeholder involvement in reviewing performance from former 4.2.5.3 (focus on the entity's olibtations to share and solicit feedback) and 4.2.4.6 (the right to review and revise)* |
| 4.2.3.1 | | The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy. | | | | |
| 4.2.5.2 | | The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders in the event that there are changes in water quantity or quality that pose an imminent threat to human health or safety, or commercial or natural resources. | | | | |

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| 4.2.5.3 | | The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders. | | | 2.6 (for rights-holders, local communities, and other stakeholders) and Chapter 3.2 (for workers); and<br>e. Engagement activities are carried out in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people; | *Language added in d. to require that the procedures for rapid communication with communities themselves be developed in collaboration with communities.* |
| ***4.2.4*** | | ***Monitoring and Adaptive Management*** | ***4.3.7*** | | ***Monitoring and Evaluation*** | *Revised heading and numbering* |
| 4.2.4.5 | | Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes. | 4.3.7.1 | | To monitor and evaluate the effectiveness and appropriateness of its measures to prevent, mitigate, and remediate all risks and impacts to water quality, and to water quantity and availability, at least annually, and building on the water monitoring program required in Section 4.3.5, the ENTITY, at least annually:<br>a. Tracks and documents its performance on water management, over successive time periods, against the key indicators and trigger levels defined in 4.3.6.2 and informed by stakeholder engagement as per 4.3.6.4;<br>b. If applicable, tracks and documents the effectiveness of the measures implemented to correct all confirmed exceedance of any IRMA Water Quality Criteria or other applicable thresholds, as per 4.3.6.3; and<br>c. Tracks and documents the effectiveness of the measures implemented to address shared challenges and contribute positively to local and regional water stewardship outcomes, as per 4.3.6.4. | *Builds on intent of former 4.2.4.5 (to monitor and evaluate progess / performance and adjust actions as required).* |
| 4.2.4.3 | | The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:<br><br>a. Participation may involve the use of independent experts selected by the community; and<br><br>b. If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed. | 4.3.7.2 | | The monitoring and evaluation process:<br>a. 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 ;<br>b. Includes continuous feedback from internal and external sources, including from joint monitoring and joint tracking with affected communities; and<br>c. If members of affected communities agree to participate in the water monitoring program required in Section 4.3.5, the ENTITY offers to cover, in full or in part, costs related to participation in monitoring and review of the monitoring program, including for independent experts, and a mutually-acceptable agreement for covering costs is developed. | *Expansion upon former 4.2.4.3 - aligned with Standard-wide changes to improve quality of stakeholder engagement / involvement.*<br><br>*4.3.8.2.b is new.* |
| | | | ***4.3.8*** | | ***Continuous Improvement*** | *New heading* |
| 4.2.5.3 | | The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders. | 4.3.8.1 | | At least annually, but without undue delay after a significant change, the ENTITY collaborates with affected rights-holders and stakeholders to review the water monitoring program, and the ENTITY's ability to demonstrate that: | *Reference to involvement of stakeholders in reviewing monitoring expands on intent of former 4.2.5.3 (to involve* |

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| 4.2.4.5 | | Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes. | | | | |
| 4.2.3.4 | | Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). | | | | |
| 4.2.3.3 | | Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:<br><br>a. Being maintained at baseline or background levels; or<br><br>b. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). | | | a. Water quality parameters/contaminants measured at points of compliance are in compliance with relevant regulatory and permit requirements in the jurisdiction;<br>b. Water quality parameters/contaminants measured at points of compliance are either: 1) Being maintained at baseline or background levels for relevant parameters, which in some cases could exceed IRMA Water Quality Criteria; or 2) Being maintained at levels that are protective of the identified uses of those waters as per the IRMA Water Quality Criteria by End Use (see Annex 4.3-A) ; or 3) Being maintained at levels or conditions compliant to country of operation's regulatory requirements that are more protective than IRMA Water Quality Criteria for identified uses, or that fill gaps where no IRMA Water Quality Criteria exist; and<br>c. Surface waters, groundwater levels, natural seep/spring flows and environmental flows are being maintained in a manner that supports continued current and potential future uses of the water resources, protected and conserved areas, biodiversity and the ecosystem services that they support, unless affected rights-holders and stakeholders have agreed that some decline in flows or water levels is acceptable . | *stakeholders in evaluating performance on water management) - aligned with Standard-wide changes to improve quality of stakeholder engagement / involvement, and 4.2.4.5 (regular review of effectiveness of adaptive management approach).*<br><br>*a reflects expectations of Chapter 1.1 on legal compliance*<br><br>*b builds on content of former 4.2.3.3*<br><br>*c incorporates content from former 4.2.3.4 and adds language specifying the range of functions and systems to which water is relevant* |
| 4.2.5.3 | | The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders. | 4.3.8.2 | | At least annually, but without undue delay after a significant change, the ENTITY collaborates with affected rights-holders and stakeholders to:<br>a. Review all conceptual and numeric models required in 4.3.3.2, using operational monitoring data;<br>b. Review the water risk and impact assessment required in 4.3.3; and<br>c. Review the results of the monitoring and evaluation required in 4.3.7, and the effectiveness of the mitigation measures and adaptive management measures the ENTITY implements.<br>d. Develop and implement time-bound corrective measures to update, if necessary , its water risk and impact assessment, including the conception and numerical models, in accordance with Section 4.3.3;<br>e. Develop and implement time-bound corrective measures to update, if necessary , its water monitoring program, in accordance with Section 4.3.5; and<br>f. Develop and implement time-bound corrective measures to update, if necessary , its adaptive management plan to improve water management outcomes, in accordance with Section 4.3.6. | *Incorporates intent of former 4.2.5.3 (to involve stakeholders in evaluating performance on water management) - aligned with Standard-wide changes to improve quality of stakeholder engagement / involvement, and 4.2.4.5 (regular review of effectiveness of adaptive management approach).*<br><br>*And d. to f. build on former 4.2.4.5 (review and revision of management plans and effectiveness of actions) and 4.2.4.6 (involvemnet of stakeholders in review and revision of plans)*<br><br>*The addition of the term "time bound corrective actions" is new.* |
| 4.2.4.5 | | Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes. | | | | |
| 4.2.4.6 | | Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans. | | | | |
| ***4.2.5*** | | ***Data Sharing, Communications and Reporting on Water Management Performance*** | ***4.3.9*** | | ***Information-Sharing and Public Reporting*** | *Renumbered and revised heading* |

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| 4.2.5.1 | | The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities:<br><br>a. Monitoring data for surface water and groundwater points of compliance; and<br><br>b. Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations. | 4.3.9.1 | | The ENTITY makes and maintains publicly accessible :<br>a. All the results of the baseline or background water quality evaluation for surface water, natural seep/springs, and groundwater; and<br>b. All the results of the baseline or background water quantity evaluation for surface water, natural seep/springs, and groundwater; and | *Former 4.2.5.1 combined publishing of baseline and monitoring data; now separate (4.3.10.1 and 4.3.10.2) because baseline/background values are established either before mining or during mining and those values hold steady, although the monitoring sites originally identified as baseline or background locations could become influenced by mining activity over time.* |
| | | | 4.3.9.2 | | At least quarterly, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. A summary of all water data over time at points of compliance;<br>b. This summary, for water quality: 1) Presents data using graphical or other suitable representations that clearly show whether parameters measured at monitoring locations are the same as, higher than, or lower than IRMA water quality criteria ; and 2) Puts any deviations from criteria into context, taking into consideration likely stakeholder concerns regarding risks to human health and impacts on the environment;<br>c. This summary, for water quantity: 1) Presents data on flows and levels for surface waters and natural seeps/springs, groundwater level/elevation, and the volume of water discharged and extracted for use by the project/operation using graphical or other suitable representations that clearly show whether the flows, levels, and volumes are the same as, higher than, or lower than baseline/background and agreed-upon values; and 2) Puts any deviations from baseline/background and agreed-upon values into context, taking into consideration likely effects on aquatic life habitat and conditions (environmental flows) and water quantity amounts needed to maintain domestic, community, and local commercial water supplies; and<br>d. Is proactively shared with affected rights-holders and stakeholders in a meaningful, accessible, and culturally appropriate way, in accordance with Section 1.2.3. | *See above.*<br><br>*Expands on 4.2.5.1 to impart a more active responsibility on the entity for info sharing; expands upon the particular nature of the information to be shared. Requirement for publication now quarterly.* |
| 4.2.3.3 | | Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:<br><br>a. Being maintained at baseline or background levels; or<br><br>b. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). | 4.3.9.3 | Critical | The ENTITY:<br>a. Demonstrates that it was able to maintain, for at least the last twelve months, all water quality parameters/contaminants measured at points of compliance: 1) in compliance with relevant regulatory and permit requirements in the jurisdiction; and 2) within one of the scenarios listed in 4.3.8.1.b;<br>b. If, and whenever, exceedance of IRMA Water Quality Criteria (see 4.3.6.2) or another threshold is confirmed, it creates a report summarizing the action plan required in 4.3.6.4, the outcome of the response measures taken, and needed changes to improve the effectiveness of implemented mitigation measures identified in 4.3.6.1 and 4.3.6.2<br>c. If, and whenever, exceedance of IRMA Water Quality Criteria or of another threshold is confirmed (see 4.3.6.2), it makes and maintains this | *Expands on former 4.2.3.3.*<br><br>*a adds language of regulatory requirement - this is new language but not a new expectation as Chapter 1.1 already required entities to demostrate compliance with host country laws.*<br><br>*b creates a new obligation to report on this performance.*<br><br>*c (obligation to share report)* |

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| 4.2.5.3 | | The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders. | | | report publicly accessible, and proactively shares it with affected rights-holders and stakeholders in a timely, meaningful, accessible, and culturally appropriate way, in accordance with Section 1.2.3. | *draws on intent of former 4.2.5.3 (which requires the entity to communicate its water management performance to stakeholders)* |
| 4.2.3.2 | | If a surface water or groundwater mixing zone is proposed as a mitigation strategy:<br><br>a. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and<br><br>b. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum:<br><br>i. Surface water or groundwater mixing zones are as small as practicable;<br><br>ii. Water in a surface water mixing zone is not lethal to aquatic life;<br><br>iii. A surface water mixing zone does not interfere with the passage of migratory fish;<br><br>iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and<br><br>v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable. | - | | | *Removed requirements regarding the use of mixing zones, as the IRMA Board has agreed these cannot be considered 'best practices' and therefore specific requirements related to mixing zones should not be included in the IRMA Standard.*<br><br>*Note that the proposed 2025 version clarifies that a mixing zone can only be proposed after demonstrating that all technically feasible options for avoiding the need for a mixing zone have been investigated and implemented.* |

# Chapter 4.4 Biodiversity, Ecosystem Services, and Protected and Conserved Areas

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **4.6** | | **Biodiversity, Ecosystem Services and Protected Areas** | **4.4** | | **Biodiversity, Ecosystem Services, and Protected and Conserved Areas** | |
| **4.5.1** | | **General Stipulations** | ***4.4.1*** | | ***Scoping and Baseline Studies*** | *New header name* |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | | | | |
| 4.6.2.1 | Critical | New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities. | | | | *Draws on and expands on former 4.6.2.1 (a critical requirement), former 4.6.2.2.a (defining boundaries of protected / conserved areas) and incorporates components of former 4.6.1.1 (competent professionals).* |
| 4.6.2.2 | | Screening shall include identification and documentation of:<br><br>a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas;<br><br>b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values;<br><br>c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and<br><br>d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. | 4.4.1.1 | Critical | A process is undertaken and documented by competent professionals to identify all protected and conserved areas that are located in the area of influence of the project/operation. This scoping process includes the identification of the boundaries of the following areas:<br><br>a. Protected areas with international recognition, including: World Heritage Sites, and areas on a state party's official Tentative List for World Heritage Site Inscription; IUCN protected area management categories I-VI; United Nations Educational, Scientific and Cultural Organization (UNESCO) biosphere reserves; and Ramsar sites;<br><br>b. Regional, national, sub-national and local legally protected areas ; and<br><br>c. Sites of other effective area-based conservation measures (OECMs) , and proposed new protected areas and sites of OECMs as reflected in formally approved Protected and Conserved Areas Expansion Strategies and/or Plans (or equivalents) . | *4.4.1.1.a makes it clear that entites need to identify the presence, if any, of specific protected areas that were mentioned in requirements former 4.6.5.2, 4.6.5.3.*<br><br>*4.4.1.1.b builds on the former 4.6.2.2.a to clarify that all protected areas from local sub-national, be identified.*<br><br>*4.4.1.1.c, which refers to conserved areas, is new. See response to Consultation Question 4.6-01.* |

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| 4.6.3.1 | | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;<br><br>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;<br><br>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | 4.4.1.2 | | Building on 4.4.1.1, a protected and conserved area baseline study is established and documented by competent professionals. This baseline study:<br><br>a. Identifies and describes the values (e.g., ecological, biological, geological, geomorphological, cultural, spiritual, historical, scenic, etc.) being protected or conserved in the identified protected and conserved areas;<br><br>b. Takes into consideration how risks related to Waste and Materials Management (Chapter 4.1), Tailings Storage Facilities and Physical Stability Management (Chapter 4.2), Water Management (Chapter 4.3), Air Quality (Chapter 4.5), and Noise and Vibration (Chapter 3.7) may result in impacts on the values in protected and conserved areas; and<br><br>c. Results in the identification of whether or not any protected or conserved areas, or the values for which the area was designated or is recognized: 1) Are at risk (i.e., may be affected by a proposed project or modification); and/or 2) Have experienced impacts (i.e., have been affected by past mining-related activities, or are being affected by current operations). | *Draws on and expands on former 4.6.3.1 (and in particular, 4.6.3.1.a, which required a baseline of the conservation values in protected areas).*<br><br>*4.4.1.1.a provides more specificity on what is meant by conservation values.*<br><br>*4.4.1.1.b is a new sub-requirement that incorporates former 4.6.2.1 guidance concerning cross-references with other issues / topics (i.e. soil, water, etc.) - added so that it is clear that information related to waste, water, air and soil management must be incorporated into the scoping of potential impacts on protected and conserved areas.*<br><br>*4.4.1.1.c. reflects expectations in former 4.6.3.1.b.* |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | 4.4.1.3 | Critical | A biodiversity and ecosystem services scoping process (or equivalent) is undertaken and documented by competent professionals to identify:<br>a. Boundaries of Key Biodiversity Areas (KBA) and Ecologically or Biologically Significant Marine Areas (EBSAs) that are located in the site's area of influence;<br>b. Boundaries of other areas of High Biodiversity Value or High Conservation Value that are located in the site's area of influence;<br>c. The ecological processes and habitats supporting those values (a. and b.);<br>d. Areas of modified habitat, natural habitat, and critical habitat within the site's area of influence ; | *Draws on and expands on former 4.6.2.1 (critical requirement), and 4.6.2.2.b and c (adding more specifics on the identification of potential or actual affected biodiversity and ecosystem services to be identified in project area), and 4.6.2.2.d (identification of ecosystem services). Also incorporates components of former 4.6.1.1 (competent professionals).* |
| 4.6.2.1 | Critical | New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities. | | | | |

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| 4.6.2.2 | | Screening shall include identification and documentation of:<br><br>a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas;<br><br>b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values;<br><br>c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and<br><br>d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. | | | e. Ecosystems or processes within the area of influence of the project/operation that may provide or do provide provisioning, regulating, cultural and supporting ecosystem services ;<br>f. The beneficiaries of the ecosystem services identified (e.); and<br>g. The priority ecosystem services. | *4.4.1.3.f. is a new sub-requirement.*<br><br>*4.4.1.3.g makes it clear that scoping involves the identification of all ecosystem services, including priority ecosystem services, as these priorities are addressed later in the Standard (see 4.4.3.3 for all risks, and 4.4.3.5 for priority ecosystem services).* |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | | | Building on 4.4.1.3, a biodiversity baseline study is established and documented by competent professionals. This baseline study:<br><br>a. Identifies the species of flora, fauna, and, where relevant, fungi, in the area of influence of the project/operation, and describes their natural habitats;<br><br>b. Identifies the important biodiversity values present in the areas of modified habitat, natural habitat, and critical habitat, and provides information on the importance of the habitats and species relative to their global distribution; and<br><br>c. Identifies quantitative measures of: 1) distribution and other measures of viability and/or function for terrestrial and aquatic habitats (ecosystems) and ecological processes, as required; and 2) abundance, distribution and other measures of viability and/or function for species of conservation concern and species of special concern (terrestrial and aquatic), as required.<br><br>d. Takes into consideration how risks related to Waste and Materials Management (Chapter 4.1), Tailings Storage Facilities and Physical Stability Management (Chapter 4.2), Water Management (Chapter 4.3), Land and Soil Pollution (Chapter 4.4), Air Quality (Chapter 4.6), and Noise and Vibration (Chapter 3.7) , may result in impacts on biodiversity;<br><br>e. Results in the identification of whether or not there are any areas of potentially important global or national biodiversity values that : 1) Are at risk, i.e., may be affected by a proposed project or a proposed new/changed activity); and/or 2) Have experienced impacts (i.e., have been affected by past mining-related activities | *Combines elements from former 4.6.2.2.b and c (identification of important biodiversity values in areas of natural, modified and critical habitat) and 4.6.3.1.a (establishment of baseline), and incorporates components of former 4.6.1.1 (competent professionals).*<br><br>*4.4.1.4.c is new. It adds specificity about the type of biodiversity baseline data that needs to be collected (in alignment with good practice guidance prepared for the Multilateral Financing Institutions Biodiversity Working Group and Cross Sector Biodiversity Initiative, which included both finance institutions and extractive industries representatives).* |
| 4.6.2.2 | | Screening shall include identification and documentation of:<br><br>a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas;<br><br>b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values;<br><br>c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and<br><br>d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. | 4.4.1.4 | | | |

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| 4.6.3.1 | | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;<br><br>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;<br><br>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | | | (including exploration), or are being affected by current operations); and<br><br>f. Results in the identification of whether or not there are any areas of potentially important local biodiversity values that are at risk or have experienced impacts (as per 4.4.1.5.b). | |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | 4.4.1.5 | | Building on 4.4.1.3, an ecosystem services baseline study is established and documented by competent professionals. This baseline study:<br><br>a. Identifies and describes the levels of dependencies of communities, the project/operation, and other stakeholders, for | *Incorporates former 4.6.3.1.a (establishment of baseline) and b. (identification of impacts), and incorporates components of former 4.6.1.1 (competent professionals).* |

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| 4.6.3.1 | | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;<br><br>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;<br><br>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | | | each ecosystem service type;<br><br>b. Takes into consideration how risks related to Waste and Materials Management (Chapter 4.1), Tailings Storage Facilities and Physical Stability Management (Chapter 4.2), Water Management (Chapter 4.3), Land and Soil Pollution (Chapter 4.4), Air Quality (Chapter 4.6), and Noise and Vibration (Chapter 3.7), may result in impacts on ecosystem services; and<br><br>c. Results in the identification of whether or not any ecosystem services : 1) Are at risk (i.e., may be affected by a proposed project or a proposed new/changed activity); and/or 2) Have experienced impacts, i.e., have been affected by past mining-related activities (including exploration), or are being affected by current operations. | *4.4.1.7.a is a new sub-requirement, aligned with international best practice guidance (See associated footnotes).*<br><br>*4.4.1.7.b is a new sub-requirement added so that it is clear that information related to waste, water, soil, air and noise/vibration (moved from Chapter 3.7) management must be incorporated into the scoping of potential impacts on ecosystem services - incorporates former 4.6.2.1 guidance concerning cross-references with other issues / topics (i.e. soil, water, etc.).* |
| | | | 4.4.1.6 | IRMA+ | *If forests are present in the area of influence of the site or its associated facilities, and building on the scoping processes required in 4.4.1.1, 4.4.1.3, and 4.4.1.6, a forest-specific baseline study is established or peer-reviewed by a reputable conservation organization and/or academic institution , and documented. This baseline study:*<br><br>*a. Identifies, describes, and maps all forests, including Primary Forests and Natural Regenerating Forests (if any), in the project/operation's area of influence;*<br><br>*b. Measures and/or estimates what the surfaces and conditions of all forests, including Primary Forests and Natural Regenerating Forests (if any), in the project/operation's area were on 31 December 2020; and*<br><br>*c. This baseline study is made and maintained publicly accessible.* | *New OPTIONAL requirement.* |

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| ***4.6.3*** | | ***Impact Assessment*** | ***4.4.2*** | | ***Risk and Impact Assessment*** | *Revised header name* |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | | | | |
| 4.6.3.1 | | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;<br><br>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;<br><br>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | 4.4.2.1 | | Building on 4.4.1, when the scoping process identifies protected or conserved areas, ecosystem services, or areas of potentially important global, national, or local biodiversity values have been or may be affected by a project/operation, a risk and impact assessment is carried out and documented by competent professionals, to determine in detail the potentially significant risks and impacts (direct, indirect, and cumulative impacts) of past and proposed mining-related activities, and associated facilities, on:<br><br>a. Biodiversity values, and the ecological processes and habitats supporting them,<br><br>b. Ecosystem services, the ecological processes and habitats supporting them, and the beneficiaries of the identified ecosystem services ; and<br><br>c. The conservation values of protected and conserved areas, and the ecological processes and habitats supporting them. | *Restructuring and additional clarification of former 4.6.3.1.b. Incorporates components of former 4.6.1.1 (competent professionals).* |

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| 4.6.3.1 | | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;<br><br>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;<br><br>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | 4.4.2.2 | | The risk and impact assessment evaluates options and measures to address potentially significant risks to, and impacts on, biodiversity, ecosystem services and the conservation values in protected and conserved areas in a manner that aligns with the mitigation hierarchy as follows :<br><br>a. By first evaluating the technically feasible alternatives to avoid/prevent significant adverse risks and impacts , avoiding a priori assumptions and judgements about alternatives;<br><br>b. Then, where avoidance or prevention is not possible, by evaluating options to minimize predicted significant adverse risks and impacts; and<br><br>c. As a last resort, where minimization is not possible, by evaluating strategies available to restore biodiversity, ecosystem services and the ecological processes and habitats that support them after impacts occur. | *Restructuring of former 4.6.3.1.c., mentioning mitigation hierarchy specifically.* |

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| 4.6.3.1 | | When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:<br><br>a. Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;<br><br>b. Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;<br><br>c. Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and<br><br>d. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services. | 4.4.2.3 | | The risk and impact assessment identifies and evaluates opportunities for:<br><br>a. Partnerships and additional conservation actions to enhance the long-term sustainable management of protected or conserved areas;<br><br>b. Partnerships and additional conservation actions to enhance the long-term sustainable management of biodiversity and ecosystem services; and<br><br>c. Identifies opportunities for compensation or offset for any significant negative residual impacts that cannot be avoided, reduced and/or restored. | *Restructuring of former 4.6.3.1.c. and d.* |
| ***4.5.4*** | | ***Biodiversity and Ecosystem Services Impact and Mitigation Management*** | ***4.4.3*** | | ***Biodiversity and Ecosystem Services Management*** | *Reworded and renumbered* |
| 4.6.4.4 | | The operating company shall develop and implement a biodiversity management plan or equivalent that:<br><br>a. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services;<br><br>b. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time;<br><br>c. Provides a budget and financing plan to ensure that funding is available for effective mitigation. | 4.4.3.1 | | Building on 4.4.1 and 4.4.2, a biodiversity and ecosystem services management plan (or equivalent) is developed and documented by competent professionals, at the level of the project/operation, to prevent, mitigate, and remediate all the risks and impacts on biodiversity and ecosystem services identified as per 4.4.2. The plan:<br>a. Outlines the specific mitigation measures that will be carried out to address the adverse risks to, and impacts on, biodiversity values, and the supporting ecological processes and habitats supporting them (identified as per 4.4.2), in a manner that strictly aligns with the mitigation hierarchy ;<br>b. Outlines the specific mitigation measures that will be carried out to address the adverse risks and impacts on ecosystem services, the supporting ecological processes and habitats supporting them, and the beneficiaries of those ecosystem services , in a manner that strictly aligns with the mitigation hierarchy ;<br>c. Includes specific objectives (including regarding no net loss/net gain as per 4.4.3.5) and appropriate time-bound performance | *Reflects content in former 4.6.4.4 but provides more clarity that mitigation measures be included in the management plan, and adds clarity that the indicators in 4.4.3.1.c are developed to inform whether or not objectives related to mitigation actions are being met.*<br><br>*The mention of the mitigation hierarchy in 4.4.3.1.a is from former 4.6.4.1.a.*<br><br>*Also incorporates former 4.6.1.1 (competent professionals).*<br><br>*4.4.3.1.b new sub-requirement* |

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| 4.6.4.1 | | Mitigation measures for new mines shall:<br><br>a. Follow the mitigation hierarchy of:<br><br>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;<br><br>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;<br><br>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and<br><br>iv. As a last resort, offsetting the residual impacts.<br><br>b. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process;<br><br>c. Be designed and implemented to deliver at least no net loss, and preferably a net gain in important biodiversity values, and the ecological processes that support those values, on an appropriate geographic scale and in a manner that will be self-sustaining after mine closure. | | | indicators to enable evaluation of the effectiveness of mitigation measures over time;<br>d. Includes appropriate monitoring actions to enable evaluation of the effectiveness of mitigation measures over time against these identified performance indicators.<br>e. Assigns implementation of measures and oversight of implementation, to responsible staff ;<br>f. Includes an implementation schedule, and estimates of human resources and budget required;<br>g. Includes a financing plan to ensure that funding is available for the effective implementation of the plan; and<br>h. Identifies the role of affected rights-holders and stakeholders in the collaborative development, implementation, and monitoring and evaluation of the plan. | *for measures specific to ecosystem services management to ensure that due attention is paid and weight given to the management of ecosystem services.*<br><br>*Expands on former 4.6.4.4.*<br><br>*4.4.3.1.e is new, and f and g are revised. These changes are designed to increase consistency with management plans in other IRMA chapters.*<br><br>*4.4.3.1.h is new. The former requirement 4.6.1.2 required engagement with stakeholders, but there was no requirement to document when and how such engagement would occur. 4.4.3.1.h is meant to fill this gap.* |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | | | | |
| 4.6.1.2 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts. | | | | |

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| 4.6.4.1 | | Mitigation measures for new mines shall:<br><br>a. Follow the mitigation hierarchy of:<br><br>i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;<br><br>ii. Where impacts are not avoidable, minimizing impacts to the extent possible;<br><br>iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and<br><br>iv. As a last resort, offsetting the residual impacts.<br><br>b. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process;<br><br>c. Be designed and implemented to deliver at least no net loss, and preferably a net gain in important biodiversity values, and the ecological processes that support those values, on an appropriate geographic scale and in a manner that will be self-sustaining after mine closure. | 4.4.3.2 | Critical | The mitigation measures included in the biodiversity and ecosystem services management plans (or equivalent) required in 4.4.3.1 and 4.4.3.3 are designed :<br><br>a. To deliver a net gain for critical habitats;<br><br>b. To deliver no net loss when possible, and preferably a net gain , in natural habitats and other important biodiversity values, and priority ecosystem services; and<br><br>c. On an appropriate geographic scale, and to be self-sustaining after closure. | *4.4.3.3 has one significant change. The former 4.6.4.1.c did not include a requirement for delivering net gain for critical habitats (it was worded to require "at least no net loss, and preferably, a net gain in important biodiversity values). The new wording is meant to be more clear about the expectations when critical habitat is impacted. (See Response to Consultation Question 4.6-03)* |
| | | | 4.4.3.3 | IRMA+ | The Entity can demonstrate that:<br><br>a. Mining-related activities do not take place in, or adversely affect , Primary Forests and Natural Regenerating Forests after 31 December 2020 ;<br><br>b. Mining-related activities do not take place in, or adversely affect, intact Natural Ecosystems, (other than Primary Forests and Natural Regenerating Forest ), after 31 December 2020 .<br><br>c. The restoration of any affected forests or other ecosystems is successfully completed by competent professionals on a voluntary basis, over and above any mitigation measures identified to achieve no net loss in 4.4.3.1 and 4.4.3.2. | *New OPTIONAL requirement.* |
| | | | 4.4.3.4 | IRMA+ | The Entity has a system in place to ensure that Nature-based Solutions (NbS) are developed and implemented by competent professionals, at the level of the project/operation, in alignment with the IUCN Global Standard for Nature-based Solutions . | *New OPTIONAL requirement.* |
| ***4.6.5*** | | ***Protected Areas Mitigation and Management*** | ***4.4.4*** | | ***Protected and Conserved Areas Management*** | *Revised header name* |

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| 4.6.5.3 | Critical | IRMA will not certify new mines that are developed in or that adversely affect the following protected areas:<br><br>• World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription;<br><br>• IUCN protected area management categories I-III;<br><br>• Core areas of UNESCO biosphere reserves. | | | | |
| 4.6.5.4 | | An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:<br><br>a. The mine was developed prior to the area's official designation;<br><br>b. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized; and<br><br>c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. | 4.4.4.1 | Critical | The Entity can demonstrate that mining-related activities do not take place in, and do not adversely affect, the following protected areas (whether legally protected or not):<br><br>a. World Heritage Sites, and areas on a state party's official Tentative List for World Heritage Site Inscription;<br><br>b. Areas classified as IUCN protected area management categories I-III; and<br><br>c. Core areas of UNESCO biosphere reserves. | *Reflects expectations in the former 4.6.5.3 and 4.6.5.4 (with some expectations moved to footnote to increase clarity). As mentioned elsewhere, the distinction between new and existing mines has been removed throughout standard.* |
| 4.6.5.1 | | An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:<br><br>a. Demonstrates that the proposed development in such areas is legally permitted;<br><br>b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;<br><br>c. Conducts mining-related activities in a manner consistent with protected area management plans for such areas; and<br><br>d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. | 4.4.4.2 | Critical | The Entity can demonstrate that mining-related activities do not occur in legally protected areas unless all the following conditions are met:<br><br>a. The proposed activities are legally permitted in those areas;<br><br>b. The Entity has consulted with relevant management authorities, protected and conserved area sponsors, managers, and relevant stakeholders on the proposed activities;<br><br>c. The Entity fully meets all other relevant requirements in this chapter . | *This reflects content in the former 4.6.5.1. Adds one minor clarification in 4.4.4.1.c, that in order to fully meet this requirement the relevant requirements in the remainder of the chapter (listed in the footnote as 4.4.1.1, 4.4.1.2, 4.4.2.1, 4.4.2.2, and 4.4.2.3) must be fully met.* |

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| 4.6.5.1 | | An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:<br><br>a. Demonstrates that the proposed development in such areas is legally permitted;<br><br>b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;<br><br>c. Conducts mining-related activities in a manner consistent with protected area management plans for such areas; and<br><br>d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. | 4.4.4.3 | | 4.4.4.3 If all the conditions required in 4.4.4.1 are met, and the ENTITY decides to proceed with mining-related activities in legally protected areas, an area management plan (or equivalent) is developed by competent professionals. This plan:<br>a. Is developed in collaboration with relevant management authorities, protected and conserved area sponsors, managers, and relevant stakeholders;<br>b. Outlines how mining-related activities will be carried out in a manner consistent with the protected or conserved area management plans developed by relevant management authorities for such areas;<br>c. If relevant , includes measures to mitigate those impacts or risks, identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time;<br>d. Includes additional conservation measures to promote and enhance the conservation aims and/or effective management of the area;<br>e. Assigns implementation of measures, and oversight of implementation, to responsible staff ;<br>f. Includes an implementation schedule, and estimates of human resources and budget required,<br>g. Includes a financing plan to ensure that funding is available for the effective implementation of the plan; and<br>h. Identifies the role of protected and conserved area sponsors, managers, and relevant stakeholders in the collaborative development, implementation, and monitoring and evaluation of the plan. | *Expands on content from former 4.6.5.1 by requiring that entities incorporate the objectives in former 4.6.5.1 into a management plan.*<br><br>*b aligns with former 4.6.5.1.c*<br><br>*c expands on intent of former 4.6.5.1.c and d, requiring entities to take actions to mitigate impacts upon conservation values of protected / conserved areas.*<br><br>*d is from former 4.6.5.1.d.*<br><br>*e. to h. are new to align with Standard-wide expectations re. resourcing for management plans.*<br><br>*This requirement also incorporates and expands on content from former 4.6.1.1 (competent professionals) and 4.6.1.2 (stakeholder engagement).* |
| 4.6.1.1 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies. | | | | |
| 4.6.1.2 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts. | | | | |
| 4.6.5.2 | | An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized.<br><br>• International Union for Conservation of Nature (IUCN) protected area management category IV protected areas;<br><br>• Ramsar sites that are not IUCN protected area management categories I-III; and<br><br>• Buffer zones of UNESCO biosphere reserves. | 4.4.4.4 | Critical | The Entity can demonstrate that mining-related activities do not take place in, and do not adversely affect, the following protected and conserved areas: 1) IUCN protected areas designated as protected area management category IV; 2) Ramsar sites that are not in areas classified as IUCN protected area management categories I-III ; 3) Buffer zones of UNESCO biosphere reserves; 4) Key Biodiversity Areas (KBAs); 5) Ecologically or Biologically Significant Marine Areas (EBSAs); 6) Sites of other effective area-based conservation measures (OECMs); 7) Proposed new protected areas and OECMs as reflected in formally approved Protected or Conserved Areas Expansion Strategies and/or Plans, or equivalents; unless all the following conditions are met:<br><br>a. Mining-related activities are legally permitted in those areas, and the operation was in place prior to the area's official designation;<br><br>b. For proposed mining-related activities, an assessment, carried | *Expands on former 4.6.5.2 by adding to the the list of protected and conserved areas the following: ..."4) Regional, national, sub-national and local legally protected areas; 5) Key Biodiversity Areas (KBAs); 6) Ecologically or Biologically Significant Marine Areas (EBSAs); 7) Sites of other effective area-based conservation measures (OECMs); 8) Proposed new protected areas and OECMs as reflected in formally approved Protected or Conserved Areas Expansion Strategies and/or Plans, or equivalents..."* |

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| 4.6.5.1 | | An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:<br><br>a. Demonstrates that the proposed development in such areas is legally permitted;<br><br>b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;<br><br>c. Conducts mining-related activities in a manner consistent with protected area management plans for such areas; and<br><br>d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. | | | out or peer-reviewed by a reputable conservation organization and/or academic institution , concludes that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized; and<br><br>c. The Entity fully meets all other relevant requirements in this Chapter. | *4.4.4.5.a is from former 4.6.5.1.a (legallly permitted), as referenced in former 4.6.5.2.*<br><br>*4.4.4.5.b is from former 4.6.5.2.*<br><br>*4.4.4.5.c is new. The relevant requirements are listed as 4.4.1.1, 4.4.1.2, 4.4.2.1, 4.4.2.2, and 4.4.2.3 in the associated footnote.* |
| 4.6.5.2 | | An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized.<br><br>• International Union for Conservation of Nature (IUCN) protected area management category IV protected areas;<br><br>• Ramsar sites that are not IUCN protected area management categories I-III; and<br><br>• Buffer zones of UNESCO biosphere reserves. | 4.4.4.5 | | If all the conditions required in 4.4.4.5 are met, and the Entity decides to proceed with mining-related activities in any of the protected areas listed in 4.4.4.5, an area management plan (or equivalent) is developed by competent professionals. This plan:<br>a. Is developed in collaboration with relevant management authorities, protected and conserved area sponsors, managers, and relevant stakeholders;<br>b. Outlines mutually-acceptable mitigation measures to protect, and if necessary, restore the integrity of the special values for which the area was designated or recognized;<br>c. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation and/or restoration activities over time; and<br>d. Includes collaboration with relevant management authorities to integrate the operation's management strategies into the protected area's management plan.<br>e. Assigns implementation of measures, and oversight of implementation, to responsible staff ;<br>f. Includes an implementation schedule, and estimates of human resources and budget required,<br>g. Includes a financing plan to ensure that funding is available for the effective implementation of the plan; and<br>h. Identifies the role of protected and conserved area sponsors, managers, and relevant stakeholders in the collaborative development, implementation, and monitoring and evaluation of the plan. | *This clarifies that mitigation actions related to the listed protected areas must be included in a management plan (consistent with expectations for all other types of legally protected areas, see 4.4.4.2).*<br><br>*The development of mitigation actions to restore the integrity of the protected areas (in 4.4.4.6.a) is new. The former 4.6.5.2 stated that entities needed to demonstrate that activities would not damage the integrity of the special values being protected in these areas. Here, b. allows for some potential impacts, but requires that the mitigation and restoration measures to manage these impacts must be "mutually-acceptable," meaning stakeholders such as management authorities, protected aera sponsors, managers and other relevant stakeholders must agree with the entity's proposed actions.*<br><br>*c. and d. are consistent with expectations in 4.6.5.1.*<br><br>*e. to h. are new to align with Standard-wide expectations re. resourcing for management plans.* |
| 4.6.5.1 | | An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:<br><br>a. Demonstrates that the proposed development in such areas is legally permitted;<br><br>b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;<br><br>c. Conducts mining-related activities in a manner consistent with protected area management plans for such areas; and<br><br>d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area. | | | | |

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| | | | ***4.4.5*** | | ***Meaningful Engagement with Stakeholders*** | New section |
| 4.6.1.2 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts. | 4.4.5.1 | | In accordance with Chapter 1.2, and as per 2.1.2.1, the Entity has a system in place to ensure that affected rights holders and stakeholders are:<br><br>a. Preemptively provided with relevant and comprehensive information, in accordance with Section 1.2.3, about the scoping processes required in 4.4.1, the risk and impact assessment required in 4.4.2, and the relevant mitigation measures that will be carried out, the estimated timeline, and the range of opportunities for them to participate in consultation and collaborative decision-making within the management of biodiversity, ecosystem services, and protected and conserved areas;<br><br>b. Offered equal opportunities to participate in consultations and collaborative decision-making, whether they are supportive of the proposed project/modification or not supportive; and<br><br>c. Included in consultations and collaborative decision-making in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people. | *Expands on former 4.6.1.2 - changes in alignment with standard-wide specifications on stakeholder engagement.* |
| | | | 4.4.5.2 | | In accordance with Chapter 1.2, the Entity has a system in place to ensure that affected rights holders and stakeholders are consulted and can review and comment, at least 60 days before reports and/or processes are finalized , on:<br><br>a. The issues, risks, and impacts to be considered in the scoping processes required in 4.4.1;<br><br>b. The methodologies for the collection of data, and the final outcomes of the baseline studies required in 4.4.1; and<br><br>c. The findings of the risk and impact assessment and the recommended mitigation measures required in 4.4.2, and the performance criteria required in 4.4.3. | *New requirement - added for alignment with standard-wide specifications on stakeholder engagement.* |

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| | | | 4.4.5.3 | | In accordance with Chapter 1.2, the Entity has a system in place to ensure that affected rights holders and stakeholders:<br><br>a. If necessary, are provided with resources for capacity building and training to enable meaningful stakeholder engagement ;<br><br>b. Are provided with the opportunity to propose independent experts to provide input to the Entity on the scoping processes, and the baseline studies; and<br><br>c. Are provided with the opportunity to propose independent experts to provide input to the Entity on the risk and impact assessment, the management plans, and the monitoring and evaluation processes. | *New requirement - added for alignment with standard-wide specifications on stakeholder engagement.* |
| | | | ***4.4.6*** | | ***Traditional Knowledge*** | New section |
| | | | 4.4.6.1 | | The ENTITY has systems in place to ensure that the traditional knowledge, and especially traditional ecological knowledge, of local affected communities and Indigenous rights holders, if applicable, is integrated into:<br><br>a. The scoping process required in 4.4.1, and the risks and impact assessment process required in 4.4.2;<br><br>b. The development of the management plans required in 4.4.3 and 4.4.4; and<br><br>c. Relevant monitoring and evaluation processes required in 4.4.7, and relevant review and continuous improvement processes required in 4.4.8. | *New requirement to complement more explicit focus on Traditional Knowledge in chapters on Free and Prior Informed Consent (2.2) and Cultural Heritage (3.6).* |
| ***4.6.6*** | | ***Monitoring*** | ***4.4.7*** | | ***Monitoring and Evaluation*** | Changed heading title |

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| 4.6.6.1 | | The operating company shall develop and implement a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine lifecycle. | 4.4.7.1 | | To monitor and evaluate the effectiveness and appropriateness of its biodiversity and ecosystem services management plan, at least annually, the ENTITY:<br><br>a. Tracks and documents its performance, over successive time periods, against the criteria and indicators defined in 4.4.3.2, 4.4.3.4, and in 4.4.4.2 and 4.4.4.6 (if relevant);<br><br>b. Tracks and documents how the measures and actions developed and implemented as per 4.4.3 and 4.4.4 are effectively preventing impacts on biodiversity and ecosystem services, and where prevention is not possible or not immediately possible, minimizing these impacts, and where minimization is not possible, restoring biodiversity, ecosystem services and the ecological processes and habitats that support them after impacts occur; and<br><br>c. Tracks and documents its progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time, as per 4.4.3.1. | *Expands on M&E requirements included in former 4.6.6.1.* |
| 4.6.6.2 | | Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time. | 4.4.7.2 | | The monitoring and evaluation process:<br><br>a. Encourages and facilitates joint tracking or joint fact-finding with affected rights holders and stakeholders, in a manner that is inclusive of different genders, ages, ethnicities, and any potentially underserved and/or marginalized people, as per Chapter 1.2 ;<br><br>b. Includes continuous feedback from internal and external sources, including from joint tracking and joint fact-finding with affected rights holders and stakeholders; and<br><br>c. Is reviewed by independent, competent experts, including those proposed by affected rights holders and communities as per 4.4.5.3. | *Builds on M&E requirement in former 4.6.6.2 and incorporates components of former 4.6.1.2 (stakeholder engagement) and 4.6.6.4 (independent review of monitoring program findings).* |
| 4.6.1.2 | | Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts. | | | | |
| 4.6.6.4. | | The findings of monitoring programs shall be subject to independent review. | | | | |
| | | | ***4.4.8*** | | ***Continuous Improvement*** | New section |
| 4.6.6.2 | | Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time. | 4.4.8.1 | | At least annually, but without undue delay after a significant change , the Entity collaborates with affected rights holders and stakeholders to:<br>a. Review the monitoring and evaluation results, informed by internal and external feedback, as per Section 4.4.7;<br>b. Review any biodiversity, ecosystem services, or protected and conserved area-related grievances and the functioning of the relevant grievance mechanism/s (see Chapter 1.6); and | *Builds on M&E requirement in former 4.6.6.2 (including focus on objective of no net loss or net gain) and 4.6.6.3 (definition and implementation of effective correct ion actions).*<br><br>*b. is a new sub-requirement,* |

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| 4.6.6.3 | | If monitoring reveals that the operating company's protected areas and/or biodiversity and ecosystem services objectives are not being achieved as expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders. | | | c. Review the ENTITY's effectiveness in achieving the objectives of at least no net loss or net gain in biodiversity and ecosystem services, as per 4.4.3.1 (and informed by monitoring and evaluation required in 4.4.7.1);<br>d. Develop and implements time-bound corrective measures to update, if necessary , the scoping processes in accordance with Section 4.4.1, and the risk and impact assessment in accordance with Section 4.4.2;<br>e. Develop and implement time-bound corrective measures to update, if necessary , the management plans in accordance with Sections 4.4.3 and 4.4.4; and<br>f. Develop and implement time-bound corrective measures to update, if necessary , the monitoring and evaluation processes in accordance with Section 4.4.7. | *incorporating review of grievances as part of the monitoring program.* |
| 4.6.4.5 | | Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle. | | | | |
| | | | ***4.4.9*** | | ***Information-Sharing and Public Reporting*** | New heading |
| 4.6.1.3 | | Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request. | 4.4.9.1 | | The Entity makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br><br>a. The risk and impact assessments;<br><br>b. The biodiversity and ecosystem services management plans, and the protected and conserved area management plans; and<br><br>c. The results and summaries of the key findings of the monitoring and evaluation processes and, if the Entity is unable to achieve the required no net loss or net gain objectives, a rationale to explain this shortfall and a detailed description of what other conservation actions are being implemented to address it. | *Reflects expectations in the former 4.6.1.3.* |

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| | | | 4.4.9.2 | | At least annually, the ENTITY makes publicly accessible updated data on, and maintains publicly accessible all previous data on land use change, sea use change, and biodiversity change, including:<br><br>a. The size in hectares of natural ecosystem converted since a cut-off or reference date, the cut-off date or reference date, and the type of ecosystem before and after conversion;<br><br>b. The size in hectares of land and sea converted from one intensively used or modified ecosystem to another during the reporting period, and the type of ecosystem before and after conversion; and<br><br>c. Changes to the state of each affected and/or potentially affected ecosystem, through: 1) the ecosystem type for the base year; 2) the ecosystem size in hectares for the base year; and 3) the ecosystem condition for the base year and the current reporting period. | *Expands on former 4.6.1.3, adding much more specificity as to expectations for reporting and incorporating new expectations for reporting on land use and sea use change (to align with GRI reporting), and as per other changes in the chapter (e.g., see new references to marine areas in 4.4.1.3 and 4.4.4.5).* |
| 4.6.4.2 | | At existing mines:<br><br>a. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement onsite restoration strategies, and also, through consultation with stakeholders, design and implement additional conservation actions to support the enhancement of important biodiversity values and/or priority ecosystem services on an appropriate geographic scale; and<br><br>b. If there is the potential for new impacts on important biodiversity values or priority ecosystem services (e.g., as a result of mine expansions, etc.), the operating company shall follow the mitigation hierarchy, prioritizing the avoidance of impacts on important biodiversity values or priority ecosystem services, but where residual impacts remain, shall apply offsets commensurate to the scale of the additional (new) impacts. | | | | *Deleted - v2.0 no longer distinguishes between new and existing mines. The requirement to follow the mitigation hierarchy remains across multiple requirements.* |
| 4.6.4.3 | | Offsetting, if required, shall be done in a manner that aligns with international best practice. | | | | *Deleted - as a general consensus seems to have emerged around the fact that biodiversity offsets cannot be considered 'best practices' and therefore should not be included in the IRMA Standard.* |

# Chapter 4.5 Air Quality and Dust Management

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **4.3** | | **Air Quality** | **4.5** | | **Air Quality and Dust Management** | |
| ***4.3.1*** | | ***Air Quality Screening and Impact Assessment*** | ***4.5.1*** | | ***Characterization and Scoping*** | *New wording* |
| | | | 4.5.1.1 | | A characterization process is undertaken and documented by competent professionals to characterize sources of air emissions and contaminants of potential concern (COPCs) as follows:<br>a. Identifies and describes all potential sources of air emissions (including fugitive emissions) from the project/operation and associated facilities, including, as relevant : 1) Mining, ore handling and transportation, grinding, crushing; 2) Mineral processing, including thermal treatments and electrolytic processes; 3) Mobile equipment; 4) Stationary equipment; 5) Power plants, and, if relevant, fuel (e.g., coal, diesel, etc.) handling and transportation; 6) Water treatment plants; 7) Waste handling, treatment, and disposal; and 8) Roads;<br>b. Identifies and describes the contaminants of potential concern (COPCs), including, as relevant : 1) Particulate matter (PM10, PM2.5); 2) Sulfur dioxide (e.g., from sulfur in fuels and feed materials or from thermal treatment of sulfide ores); 3) Nitrogen oxides (NO and NO2); 4) Carbon monoxide; 5) Ozone; 6) Polycyclic Aromatic Hydrocarbons (PAH); 7) Volatile organic compounds (including benzene); 8) Acids; 9) Persistent organic pollutants; 10) Metals and metalloids; and 11) Radionuclides; and<br>c. It uses credible methodologies, and the methodologies are documented. | *This is a new requirement, added to fill a gap in the 2018 Mining Standard and to be more consistent with other IRMA chapters that require identification of potential contaminants of concern (e.g., Chapters 4.1 and 4.3). The addition of this requirement was supported by responses to Consultation Question 4.3-01*<br><br>*The need for identifying sources of air emissions was addressed in guidance for the former 4.1.1.1. Requirement 4.5.1.1.a provides clarity on the specific sources to be characterized.*<br><br>*4.5.1.1.b (identifying COPCs) is new.*<br><br>. |

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| 4.3.1.1 | | The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations. | 4.5.1.2 | | A scoping process (or equivalent) is undertaken and documented by competent professionals, in collaboration with affected rights-holders and stakeholders, to identify potential receptors and potential values that may be affected by air contaminants or dust from the site and its associated facilities, and to identify the sources of air emissions that are 'significant', as follows: It includes the following potential receptors and values:<br>a. It identifies individuals, communities, soils, water bodies, or cultural heritage sites that may be affected by emissions, deposition or dispersion of the identified COPCs;<br>b. It identifies potentially underserved and/or marginalized people within nearby affected communities, or individuals in nearby residences, who may be particularly sensitive receptors of the identified COPCs ;<br>c. It identifies plants, animals, or fungi with known sensitivity to the identified COPCs;<br>d. It identifies receptors that may be affected by dust or odors;<br>e. It identifies individuals, animals, cattle, plants, crops, water bodies, and cultural heritage sites that may be affected by dust and dust deposition;<br>f. It identifies areas with scenic values that may be affected by haze;<br>g. It defines the criteria used to identify levels of significance of air emissions;<br>h. It estimates emissions of COPCs identified in 4.5.1.1.b from each potential emissions source identified in 4.5.1.1.a, based on proposed or actual operational characteristics, using credible methodologies; and<br>i. It documents the rationale for why certain facilities, activities or processes are considered to be minor or insignificant sources of emissions of air contaminants or dust. | *Expands upon former 4.3.1.1. It provides greater clarity on the scoping process (in the 2018 standard this was called 'screening'), such as the need to identify potential receptors (i.e., those potentially subject to air quality impacts), so that there is a more consistent approach to understanding potential impacts related to air emissions.*<br><br>*The need to understand potential air quality impacts on communities was included in guidance for the former 4.3.1.1.*<br><br>*4.5.1.2.a, c (and 4.5.1.3.b and c, below) expand on this by requiring identification of non-human receptors such as flora, fauna, cultural heritage site, water bodies and scenic areas.* |
| | | | ***4.5.2.1*** | | ***Baseline/Background Data*** | *New heading* |
| 4.3.1.2 | | During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area. | 4.5.2.1 | | 4.5.2.1 Data on baseline (or background) air quality are gathered by competent professionals, as follows:<br>a. Data are gathered in sufficient detail to reliably determine the sources of air contamination that are related to the site and its associated facilities, and the changes in air quality that are unrelated to the site and its associated facilities; and<br>b. Data include measurement of the ambient concentrations of all identified COPCs . | *Expands on content in former 4.3.1.2.*<br><br>*b. adds that baseline/background data are required for all COPCs* |
| | | | ***4.5.3*** | | ***Risk and Impact Assessment*** | *New heading* |

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| 4.3.1.3 | | If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts. | 4.5.3.1 | | If the scoping required in 4.5.1 or any other credible information indicates that air emissions and/or dust deposition from project-related activities may adversely impact human health, quality of life, livelihoods, or the environment, a risk and impact assessment is carried out and documented by competent professionals, in collaboration with affected stakeholders, to identify and assess, for each identified risk and impact:<br>a. The level of risk posed to, and the magnitude of impact on, health, quality of life, and livelihoods;<br>b. The level of risk posed to, and the magnitude of impact on, the environment; and<br>c. This risk and impact assessment uses a credible methodology, and the methodology used is documented. | *Expands upon expectations for an impact assessment from former 4.3.1.3.* |
| 4.3.1.4 | | The assessment shall include the use of air quality modeling and monitoring consistent with widely accepted and documented methodologies to estimate the concentrations, transport and dispersion of mining-related air contaminants. | 4.5.3.2 | | This risk and impact assessment is informed by the modelling of the emissions, deposition, and dispersion of COPCs , developed by competent professionals using credible methodologies. The modelling:<br>a. Includes estimation of potential emissions on a contaminant-by-contaminant basis, and under various operational scenarios including maximum emissions during maximum production levels;<br>b. Includes estimation of potential emissions at potentially sensitive receptors (e.g., residences, water bodies, ecosystems) under the worst-case dispersion conditions; and<br>c. Is evaluated annually and updated, as necessary, through an iterative process using the results of the ambient air quality and dust monitoring program (see 4.5.4). | *This requirement expands on and adds clarity to former 4.3.1.4, by adding more detail on methodologies and steps to be included in the assessment.*<br><br>*4.5.3.2.a and b draw on guidance for former 4.3.1.3 (in terms of estimating emissions and identifying potential receptors).*<br><br>*4.5.3.2.c. Draws on intent of former 4.3.2.2 that asks for update of 'strategies and plans' (although not specifically assessment)* |
| 4.3.2.2 | | Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life. | | | | |
| ***4.3.3*** | | ***Air Quality Monitoring*** | ***4.5.4*** | | ***Ambient Air Quality and Dust Monitoring Program*** | *Revised wording of heading* |
| 4.3.3.1 | | The operating company shall monitor and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring. | 4.5.4.1 | | Building on 4.5.3, an air quality monitoring program (or equivalent) is developed and implemented by competent professionals to monitor relevant COPCs in ambient air, and/or to monitor dust deposition , as follows:<br>a. The locations of the ambient air quality and dust monitoring stations are in sufficient number to provide reliable data on air quality/contamination, and dust deposition, across the site' area of influence and relevant transportation routes;<br>b. The monitoring locations provide a representative sampling of air quality and dust deposition sufficient to detect air quality and dust impacts on affected receptors and values; and<br>c. The monitoring stations are equipped to monitor all contaminants or dust deposition levels that have a reasonable potential to | *This requirement expands on and adds clarity to former 4.3.3.1 by adding more detail on methodologies and steps involved in monitoring,.*<br><br>*'Personnel trained in air quality monitoring" from former 4.3.3.1 changed to 'competent professionals for Standard consistency.* |

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| 4.3.3.2 | | Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results. | | | adversely affect identified receptors and values, and are capable of measuring parameters at the appropriate levels described in the IRMA Air Quality Criteria Table (see Annex 4.5-A) | |
| 4.8.2.1 | | Any mine facility that uses a thermal process to treat material containing mercury (e.g., ore, concentrate) shall utilize best available techniques (BAT) and best environmental practices (BEP) to control and minimize the amount of mercury released to the atmosphere unless the operating company can demonstrate that mercury emissions from the mining project are unlikely to pose a significant risk to human health or the environment. | 4.5.4.2 | | If mercury is detected in ore, concentrate, or mining facilities (including tailings, heap leaches, waste rock), as determined in 4.1.2.1 and/or 4.5.1.1, the ENTITY has a system in place to ensure that:<br>a. Best available techniques (BAT) and best environmental practices (BEP) are used to control fugitive gaseous and dust emissions associated with crushing, grinding, handling, and transporting of ore, concentrate and/or disposal of waste materials containing mercury, unless the ENTITY can demonstrate that fugitive emissions (gaseous and dust) from certain sources are unlikely to pose a significant risk to human health or the environment;<br>b. These BAT and BEP are Implemented at mineral processing or smelting facilities that use thermal processes , unless the ENTITY can demonstrate that air emissions (gaseous and dust) from the facility are unlikely to pose a significant risk to human health or the environment ;<br>c. Mercury is included in the ambient air monitoring program;<br>d. Direct releases of mercury to the atmosphere from ore treatment and/or mineral processing or smelting facilities that use thermal processes are monitored and documented;<br>e. Fugitive emissions are monitored and documented , or the ENTITY provides best estimates for these emissions;<br>f. The amount of mercury recovered or captured as by-product in mercury emission control systems is monitored and documented;<br>g. The concentrations of mercury in soils, water, sediment, and biota downwind of the emissions sources are monitored and documented; and<br>h. The ENTITY collaborates with affected rights-holders and stakeholders to develop and implement a mercury monitoring plan (or | *Moved from former Chapter 4.8 ('Mercury Management') which is being deleted and its contents integrated into other chapters.*<br><br>*a. and b. (using BAT and BEP to control emissions) aligns with requirement former 4.8.2.1.*<br><br>*c. aligns with former 4.8.3.2.c.*<br><br>*d. to f. are from former 4.8.3.3.a, c and d.*<br><br>*g. is a combination of former 4.8.3.2.b and 4.8.3.3.e and*<br><br>*h. aligns with former 4.8.3.2.a and 4.8.3.1.* |
| 4.8.3.2 | | The mercury monitoring plan shall address:<br><br>a. Potential public health impacts (e.g., food source and blood level mercury);<br><br>b. Environmental impacts monitoring (e.g., fish tissue and stream sediment mercury levels), including locations that are most likely to promote methylation, such as still waters, wetlands, and anaerobic sediment; an<br><br>c. Mercury air emission monitoring, which shall be conducted at least annually for direct releases to the atmosphere from an autoclave, roaster, carbon kiln, refining furnace, or other thermal process that has a mercury emission control system. | | | | |
| 4.8.3.1 | | For each mining project with a source of mercury air emissions a mercury monitoring plan shall be developed in consultation with relevant stakeholders. | | | | |

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| 4.8.3.3 | | The mercury monitoring plan shall include the monitoring of:<br><br>a. The quantity of mercury released to air including fugitive emissions (to the extent technologically and economically feasible with air monitoring equipment);<br><br>b. The quantity of mercury released to water, including the forms of mercury;<br><br>c. The amount of mercury captured in a mercury emission control system; and<br><br>d. The amount of by-product mercury produced (including the mercury captured by a mercury emission control system); and<br><br>e. Methyl mercury and sulfate, if mines have a mercury emission control system. In such cases, sampling shall be regularly conducted in wetlands and water bodies on or near the mine site. | | | equivalent) to monitor and document mercury levels in their blood, urine, and hair, and in any significant food sources that may be affected by the emissions; | |
| ***4.3.2*** | | ***Air Quality Management Plan*** | ***4.5.5*** | | ***Air Quality Management*** | *Revised wording of heading* |
| 4.3.2.1 | Critical | If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality. | 4.5.5.1 | | 4.5.5.1 Building on 4.5.3 and 4.5.4, if significant potential or actual impacts on air quality are identified, an air quality management plan (or equivalent) is developed and documented by competent professionals as follows:<br>a. The plan outlines mitigation measures that strictly align with the mitigation hierarchy to first avoid and, where that is not possible, minimize adverse impacts on human health and the environment (including impacts to land, soil, water, and vegetation);<br>b. It identifies key air quality indicators that will best characterize the potential effects, and includes trigger levels to provide early warning of ambient air pollution ;<br>c. It includes general responsive (adaptive management) measures to be taken if trigger levels or other thresholds are reached, and estimated timelines for completion of measures;<br>d. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>e. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>f. It has an implementation schedule in place;<br>g. It specifies annual, or more frequent, reviews of the effectiveness of the measures implemented;<br>h. It maintains estimates of human resources and budget required; and<br>i. It includes a financing plan to ensure that funding is available for the effective implementation of the plan. | *4.5.5.1 aligns with former 4.3.2.1. Both are critical requirements.*<br><br>*Additional details added to expand on expectations for management plans to be more consistent with other IRMA chapter (for example, requirements related to indicators and trigger levels for responsive actions, and timelines for completion of actions).* |
| 4.3.2.2. | | Air quality management strategies and plans shall be implemented and updated as necessary over the mine life. | | | | |
| ***4.3.4*** | | ***Protection of Air Quality*** | | | | *Deleted heading* |

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| 4.3.4.1 | | New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:<br><br>a. If a mine is located in an airshed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or<br><br>b. If a mine is located in an airshed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards, and make incremental improvements to the air quality in the airshed that are at least equivalent to the mining project's emissions. | 4.5.5.2 | | The air quality management plan required in 4.5.5.1 includes the creation of an action plan (or equivalent) if exceedance of IRMA Ambient Air Quality Criteria (see 4.5.4.1) or other applicable thresholds is confirmed, as follows:<br>a. Determination of the areal extent of the impacts, and investigation of the cause/source of the exceedance;<br>b. If the cause/source is located in an airshed where baseline air quality was already degraded beyond the IRMA Ambient Air Quality Criteria (see Annex 4.5-A), determination of the extent to which emissions from site-related activities, alone, exceed the IRMA Ambient Air Quality Criteria (or not);<br>c. Evaluation and selection of adaptive management measures developed as per 4.5.5.1.c, and/or development of additional or different measures that are likely to correct the exceedance or minimize adverse impacts (or, where baseline air quality was already degraded, to make incremental improvements to the air quality in the airshed that are at least equivalent to the site's own emissions), and documentation in a corrective action plan ;<br>d. Development of estimated timeline and budget needed to implement these corrective measures, and a financing plan to ensure that funding is available for effective implementation of the corrective measures; and<br>e. Implementation of those corrective measures. | *Responses to air quality exceedences were addresed in former 4.3.4.1 and 4.3.4.2, however, the need for an action plan is new.*<br><br>*d. is a new sub-requirement, aligned with Standard-wide changes to expectations for management plan resourcing and implementation details.* |
| 4.3.4.2 | | As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:<br><br>a. New and existing mines shall comply with host country air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard;<br><br>b. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply;<br><br>c. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and<br><br>d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines. | | | | |

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| | | | 4.5.5.4 | | The ENTITY has a system in place to ensure that air pollution control equipment is inspected on a regular basis, by competent professionals:<br>a. To verify that the equipment was installed and is being maintained in accordance with vendor instructions;<br>b. To verify that the equipment is operating as expected; and<br>c. Inspection dates and observations are documented and recorded by the ENTITY. | *New requirement.* |
| | | | 4.5.5.5 | | The ENTITY has a system in place for unwanted events that is carried out by competent professional, that includes:<br>a. Taking and documenting corrective measures to minimize air emissions from unwanted events, and additional ambient air quality and dust sampling and analyses to determine potential exceedance of ambient air quality and dust levels as per Annex 4.3-A and 4.3-C respectively;<br>b. For high-potential incidents or incidents that exceed the air quality levels (as determined in 4.5.5.5.a), carrying out and documenting a root cause-analysis to determine the cause of the unwanted event; and<br>c. Closing out actions from the root cause analysis, and updating the air quality management plan (or equivalent) to prevent similar occurrence of high-potential incidents or incidents that exceed the air quality levels. | *New requirement.* |
| | | | ***4.5.6*** | | ***Dust Management*** | *New heading* |
| 4.3.4.3 | | Dust deposition from mining-related activities shall not exceed 350 mg/m2/day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination. | 4.5.6.1 | | Building on 4.5.4, if significant potential or actual impacts related to dust emission or deposition are identified, or monitoring in 4.5.4.1 confirms an exceedance of the IRMA Dust Deposition Criteria in Annex 4.5-C, a dust management plan (or equivalent) is developed and documented by competent professionals, as follows:<br>a. It outlines mitigation measures that strictly align with the mitigation hierarchy to first avoid and, where that is not possible, minimize adverse impacts on individuals, animals, cattle, plants, crops, water bodies, or cultural heritage sites,;<br>b. It identifies key dust indicators that will best characterize the potential effects;<br>c. It assigns implementation of measures to responsible staff with adequate skills and expertise;<br>d. It assigns responsibility to its top management level to oversee plan implementation, monitoring, and recordkeeping ;<br>e. It has an implementation schedule in place;<br>f. It specifies annual, or more frequent, reviews of the effectiveness of the measures implemented;<br>g. It maintains estimates of human resources and budget required; and<br>h. It includes a financing plan to ensure that funding is available for the effective implementation of the plan. | *Expands upon former 4.3.4.3, asking for an explicit management plan to achieve the expectations indicated.*<br><br>*C. to h. are new sub-requirements, aligned with Standard-wide changes to expectations for resourcing and implementation of management plans* |
| | | | ***4.5.7*** | | ***Monitoring and Evaluation*** | *New heading* |

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| | | | 4.5.7.1 | | To monitor and evaluate the effectiveness and appropriateness of its measures to prevent, mitigate, and remediate all risks and impacts to air quality and related to dust, at least annually, and building on the ambient air and dust monitoring program required in Section 4.5.4, the ENTITY:<br>a. Tracks and documents its performance on air quality and dust management, over successive time periods, against the key indicators and trigger levels defined in 4.5.5.1 and 4.5.6.1;<br>b. If applicable, tracks and documents the effectiveness of the measures implemented to correct all exceedance of any IRMA Ambient Air Quality Criteria or other applicable thresholds, as per 4.5.6.3; and<br>c. 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. | *New requirement added to align with Plan-Check-Do-Act cycle (Standard-wide change).* |
| | | | ***4.5.8*** | | ***Continuous Improvement*** | |
| 4.3.4.1 | | New mines and existing mines shall comply with the European Union's Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:<br><br>a. If a mine is located in an airshed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or<br><br>b. If a mine is located in an airshed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards, and make incremental improvements to the air quality in the airshed that are at least equivalent to the mining project's emissions. | 4.5.8.1 | | At least annually, but without undue delay after a significant change, the ENTITY collaborates with affected rights-holders and stakeholders to:<br>a. Review the ENTITY's ability to demonstrate that air quality parameters/contaminants measured at points of compliance are in compliance with relevant regulatory and permit requirements in the jurisdiction;<br>b. Review the ENTITY's ability to demonstrate that air quality parameters/contaminants measured at points of compliance are: 1) Being maintained at baseline or background levels for relevant parameters, which in some cases could exceed IRMA Ambient Air Quality Criteria (see Annex 4.5-A); or 2) Being maintained at levels that are protective of the identified receptors and values, as per the IRMA Ambient Air Quality (see Annex 4.5-A); or 3) Being maintained at levels or conditions compliant to country of operation's regulatory requirements that are more protective than IRMA Ambient Air Quality Criteria, or that fill gaps where no IRMA Ambient Air Quality Criteria exist;<br>c. Review the ENTITY's ability to demonstrate that dust deposition from project-related activities measured at points of compliance does not exceed the IRMA Dust Deposition Criteria (See Annex 4.5-C);<br>d. Review the results of the monitoring and evaluation required in 4.5.7, and the effectiveness of the mitigation measures and | *New requirement related to continuous improvement added to align with Plan-Check-Do-Act cycle (Standard-wide change)*<br><br>*Reference to involvement of stakeholders is aligned with Standard-wide changes to improve quality of stakeholder engagement / involvement.*<br><br>*a. reflects expectations of Chapter 1.1 on legal compliance*<br><br>*b. builds on content of former 4.3.4.1.a (demonstrating incremental reductions in emissions), 4.3.4.1.b (incremental improvements in air quality), and 4.3.4.2 (demonstrating incremental reductions in emissions through a multi-phased plan with defined* |

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| 4.3.4.2 | | As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:<br><br>a. New and existing mines shall comply with host country air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard;<br><br>b. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply;<br><br>c. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and<br><br>d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines. | | | management measures it implements;<br>e. Develop and implement time-bound corrective measures to update, if necessary , the risk and impact assessment, including the conception of numerical models, in accordance with Section 4.5.3;<br>f. Develop and implement time-bound corrective measures to update, if necessary , its ambient air and dust monitoring program, in accordance with Section 4.5.4; and<br>g. Develop and implement time-bound corrective measures to update, if necessary , its management plans to improve air quality and dust management outcomes, in accordance with Sections 4.5.5 and 4.5.6 | *timelines).*<br><br>*c. and d. are new*<br><br>*e. to g. are new; related to continuous improvement added to align with Plan-Check-Do-Act cycle (Standard-wide change)* |
| ***4.3.5*** | | ***Reporting*** | ***4.5.9*** | | ***Information-Sharing and Public Reporting*** | *New heading* |
| 4.3.5.1 | | The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available, or made available to stakeholders upon request. | 4.5.9.1 | Critical | The ENTITY:<br><br>a. Demonstrates publicly that it was able to maintain, for at least the last twelve months, all air quality and dust deposition parameters/contaminants measured at points of compliance: 1) in compliance with relevant regulatory and permit requirements in the jurisdiction; and 2) within one of the scenarios listed in 4.5.8.1.b for air quality, and listed in 4.8.2 for dust deposition;<br>b. If, and whenever, exceedance of IRMA Ambient Air Quality Criteria or IRMA Dust Deposition Criteria, or another threshold is confirmed, it creates a report summarizing the corrective measures required in 4.5.5.3, their outcome, and needed changes to improve the effectiveness of implemented mitigation measures identified in Section 4.3.6; and<br>c.Makes and maintains publicly accessible this report, and proactively shares it with affected stakeholders in a timely, culturally-appropriate and easily-understandable manner, in accordance with Section 1.2.3. | *Builds upon former 4.3.5.1, asking for 'public demonstration' of air quality / dust monitoring data, and publication of a report where any exceedances occur.* |

# Chapter 4.6 Climate Action

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| **Req #** | **Critical** | **Requirement** | **Req #** | **Critical** | **Requirement** | |
| **4.5** | | **Greenhouse Gas Emissions** | **4.6** | | **Climate Action** | |
| | | | ***4.6.1*** | | ***Formalized Policy*** | |
| 4.5.1.1 | Critical | The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:<br><br>a. Identifying and measuring greenhouse gas emissions from the mining project;<br><br>b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project;<br><br>c. Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and<br><br>d. Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions. | 4.6.1.1 | | The ENTITY has a formal policy in place that<br>a. Commits to take climate action in order to protect workers, affected rights-holders and stakeholders, and facilities, from the adverse impacts of climate change;<br>b. Includes a clear commitment to avoid and reduce greenhouse gas emissions linked to the ENTITY's mining-related activities at a pace and scale consistent with mitigation pathways that meet the goals of the Paris Agreement to curb global temperature rise to 1.5°C above pre-industrial levels;<br>c. Is approved at the top management level of the ENTITY;<br>d. Is proactively communicated to affected rights-holders and stakeholders, personnel, contractors, suppliers, customers, and other relevant business partners;<br>e. Is publicly accessible; and<br>f. The ENTITY has allocated financial and staffing resources to implement this policy at the level of the site. | *b. builds on intent of former 4.5.1.1.b with more specific goals linked explicitly to Paris Agreement*<br><br>*c. to e. align with Standard-wide expectations relating to policy approvals*<br><br>*f. new expectation - aligns with Standard-wide expectations relating to resourcing of plans / policies* |
| | | | ***4.6.2*** | | ***Contribution to Climate Change*** | *New heading* |
| | | | 4.6.2.1 | | Building on the scoping and risk and assessment processed required in 2.1, an assessment of the significant contributions of the site and its associated facilities to climate change is conducted and documented by competent professionals as follows:<br>a. The assessment includes a full inventory of identified causes and effects of the contributions of the site and its associated facilities to climate change, and their levels of significance;<br>b. The assessment considers direct and indirect contributions to climate change;<br>c. It is updated, at least annually, and whenever there is the potential that the magnitude, duration, or probability of already-identified causes and effects have changed; and<br>d. The ENTITY facilitates the participation of affected rights-holders and stakeholders in the assessment process, in accordance with Chapter 1.2. | *New requirement.* |

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| | | | 4.6.2.2 | IRMA+ | *The ENTITY has an comprehensive site-wide plan (or equivalent) to mitigate and adapt to the adverse environmental, bio-geophysical, and social impacts of climate change, always following the mitigation hierarchy that integrates all its management plans and mitigation measures related to:*<br>*a. Greenhouse gas emissions and energy reduction;*<br>*b. Waste and materials management;*<br>*c. Water management;*<br>*d. Air pollution; and*<br>*e. Biodiversity, ecosystem services, and protected areas.* | *New OPTIONAL requirement requiring a holistic, integrated plan to address impacts of climate change from mining activities.* |
| | | | ***4.6.3*** | | ***Technology Selection*** | |
| | | | 4.6.3.1 | | The ENTITY has a system in place to ensure energy efficiency and minimization of greenhouse gas emissions are considered by competent professionals:<br>a. When selecting technology options and alternatives for, where applicable, energy sources, mining and processing methods, technologies and equipment, and the design of new buildings and facilities (at proposed projects, or existing operations);<br>b. When there are opportunities to replace, upgrade, or add technology, or change processes; and<br>c. The ENTITY documents how energy efficiency and minimization of greenhouse gas emissions were considered, and the rationale for the final selections. | *New requirement to shed light on how technology decisions are made and whether / how climate actions / energy efficiency considered.*<br><br>*(This was first proposed in the draft IRMA-Ready Standard for Exploration).* |
| ***4.5.2*** | | ***Emissions Quantification*** | ***4.6.4*** | | ***GHG Emissions and Energy Consumption Quantification*** | |
| 4.5.2.1 | | The operating company shall comply with emissions quantification methods described in a widely accepted reporting standard, such as the *Greenhouse Gas Protocol Corporate Standard*or the Global Reporting Initiative's *GRI 305* emissions reporting standard. | 4.6.4.1 | | For Scope 1 and 2 emissions, at least annually:<br>a. Emissions of all relevant Scope 1 greenhouse gases associated with the project/operation, including emissions from land use changes and reductions in land carbon stock arising from the site's direct activities , are calculated by competent professionals, using internationally-recognized (or national, where they meet or exceed them) protocols or standards ;<br>b. Emissions of all relevant Scope 2 greenhouse gases associated with the project/operation are calculated by competent professionals, using internationally-recognized (or national, where they meet or exceed them) protocols or standards ; and<br>c. All Scope 1 and Scope 2 emissions calculations are verified by a credible third-party expert. | *Re: GRI 305 in former 4.5.2.1 - now proposing that any credible methodology can be used.*<br><br>*a. contains new dimensions to address contributions from land clearing (and the associated loss of vegetation and potential degradation of soil resources) in GHG accounting*<br><br>*b. builds on intent of former 4.5.2.1 but is no longer tied specifically to GRI 305 (any credible methodology is accepted now)*<br><br>*c. new requirement* |

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| | | | 4.6.4.2 | | For Scope 3 emissions:<br>a. A screening exercise is completed by competent professionals to determine relevant upstream and downstream Scope 3 categories associated with the project/operation, using credible methodologies;<br>b. At least annually, Scope 3 emissions of all relevant greenhouse gases for those relevant categories of emissions identified are calculated using credible methodologies; and<br>c. All Scope 3 emissions calculations are verified by a credible third-party expert. | *New requirement to address scope 3 emissions (is consistent with 4.5.1.1.c, but was not explicitly required in 2018).* |
| | | | 4.6.4.3 | | At least annually, energy consumption associated with the project/operation is measured using a credible methodology, and data are disaggregated into:<br>a. Energy generated by the site from fossil fuels and consumed by fixed and mobile equipment (collectively referred to as 'sources of Scope 1 emissions');<br>b. Acquired and consumed electricity, steam, heat, or cooling (collectively referred to as 'sources of Scope 2 emissions'); and<br>c. Energy derived from renewable sources purchased from external suppliers and, separately, from renewable sources generated by the ENTITY. | *New requirement - 2018 Standard did not require energy quantification.* |
| | | | ***4.6.5*** | | ***Scoping*** | |
| 4.5.3.3 | | The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies, and shall document the results of its investigations. | 4.6.5.1 | | A scoping process is undertaken and documented by competent professionals to:<br>a. Identifies sources of direct and/or indirect emissions that can be eliminated and/or that have the highest reduction potential; and<br>b. Identifies technically feasible opportunities to increase energy efficiency, including through the adoption of less impactful sources of energy ;<br>c. Identifies opportunities for carbon capture and storage of any emissions that cannot be avoided;<br>d. Building on a. to c., identify and prioritize options for managing GHG emissions sequentially, in accordance with the mitigation hierarchy, starting with action to avoid emissions at the level of the project/operation, followed by action to reduce and minimize them, and, as a last resort, compensate for them; and<br>e. Ensure that any emission-reduction opportunity takes into consideration the potential adverse social and human rights impacts arising from its implementation. | *Expands significantly upon intent of former 4.5.3.3.*<br><br>*e. is new* |
| | | | ***4.6.6*** | | ***Greenhouse Gas and Energy Targets*** | |

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| 4.5.1.1 | | The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:<br><br>a. Identifying and measuring greenhouse gas emissions from the mining project;<br><br>b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project;<br><br>c. Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and<br><br>d. Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions. | 4.6.6.1. | Critical | Building on the quantification required in 4.6.4 and the scoping process required in 4.6.5, the Entity has site-based targets in place for absolute Scope 1 and Scope 2 greenhouse gas emissions, developed by competent professionals using a credible methodology, as follows:<br><br>a. These targets include time-bound short-term (<5 years), medium-term (5-15 years) and long-term (>15 years) site-based targets;<br>b. These targets are in line with the Paris Agreement, or are part of corporate-level targets that are in line with the Paris Agreement unless the site meets all the criteria for Green Enabling Projects and can demonstrate the environmental benefits of its production's end-use; and<br>c. These targets are verified and validated by a credible third-party expert. | *Expands upon intent of former 4.5.1.1.b and c. for scope 1&2 emissions and former 4.5.3.1 for establishment of an action plan.*<br><br>*a. and b. offer additional specification for "setting achievable targets" in former 4.5.1.1*<br><br>*c. new subrequirement* |
| 4.5.3.1 | | The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy. | | | | |
| | | | 4.6.6.2 | | Building on the quantification required in 4.6.4 and the scoping process required in 4.6.5, the Entity has the following targets in place, developed by competent professionals using a credible methodology:<br>a. An energy consumption reduction target, either at site-level or as part of corporate-level targets;<br>b. A target for increasing the proportion of energy consumed that comes from renewable sources, either at site-level or as part of corporate-level targets; and<br>c. Targets to reduce, to the greatest extent possible, Scope 3 emissions of all relevant greenhouse gases, disaggregated by the relevant categories of emissions identified in 4.6.4.2, either at site-level or as part of corporate-level targets. | *New requirement - 2018 Standard did not require targets on energy.* |
| | | | ***4.6.7*** | | ***Greenhouse Gas and Energy Management*** | |

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| 4.5.3.1 | | The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy. | 4.6.7.1 | | Building on 4.6.4, 4.6.5, and 4.6.6, a management plan (or equivalent) is developed and documented by competent professionals, at the level of the site, to manage energy and GHG emissions reductions. The plan:<br>a. Outlines specific measures with their priority levels to achieve, in accordance with the mitigation hierarchy, the site-level Scope 1, Scope 2 and, if relevant, Scope 3 greenhouse gas reduction targets required in 4.6.6 and updated as per 4.6.10;<br>b. Outlines specific measures with their priority levels to achieve, in accordance with the mitigation hierarchy, the site-level energy consumption reduction targets required in 4.6.6 and updated as per 4.6.10;<br>c. Outlines specific measures with their priority levels to achieve, in accordance with the mitigation hierarchy, the site-level targets for the proportion of energy consumed at the site that comes from renewable sources, required in 4.6.6 and updated as per 4.6.10;<br>d. Assigns implementation of measures, or oversight of implementation, to responsible staff ;<br>e. Includes an implementation schedule, estimates of human resources and budget required;<br>f. Includes a financing plan to ensure that funding is available for the effective implementation of the plan; and<br>g. Is made and maintained publicly accessible. | *Builds on intent of former 4.5.3.1 - updated this requirement to be more consistent with management plan expectations in other IRMA chapters.*<br><br>*Expectations for scope 3 emissions , energy efficiency and renewable energy are new.* |
| | | | 4.6.7.2 | IRMA+ | *The plan is integrated into an overarching holistic approach that moves beyond the carbon tunnel vision, and takes into account all nine planetary boundaries: Climate change, Change in biosphere integrity, Biogeochemical, Ocean acidification, Land use, Freshwater change, Ozone depletion, Atmospheric aerosols, and Novel entities.* | *New OPTIONAL requirement* |
| | | | ***4.6.8*** | | ***Traditional Knowledge*** | |
| | | | 4.6.8.1 | | The ENTITY has systems in place to ensure that traditional knowledge, and especially traditional ecological knowledge, of local affected communities, and Indigenous rights holders if applicable, is integrated into:<br>a. The scoping process required in 4.6.5;<br>b. The development of the management plan required in 4.6.7; and<br>c. Relevant monitoring and evaluation processes required in 4.6.9; and<br>d. Relevant review and continuous improvement processes required in 4.6.10. | *New requirement in line with higher expectations in other chapters re: the recognition of traditional knowledge.* |
| | | | ***4.6.9*** | | ***Monitoring and Evaluation*** | *New heading* |

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| 4.5.3.2 | | The operating company shall demonstrate progress toward its greenhouse gas reduction targets. | 4.6.9.1 | | To monitor and evaluate the implementation and effectiveness of its climate action, the ENTITY, at least annually:<br>a. Tracks and documents its performance on reducing, in accordance with the mitigation hierarchy, site-level Scope 1 and Scope 2 and, if relevant, Scope 3 greenhouse gas emissions, over successive time periods, against the targets required in 4.6.6 and updated as per 4.6.10;<br>b. Tracks and documents its performance on reducing site-level energy consumption, over successive time periods, against the targets required in 4.6.6 and updated as per 4.6.10; and<br>c. Tracks and documents its performance on increasing the proportion of energy consumed at the site that comes from renewable sources, over successive time periods, against the targets required in 4.6.6 and updated as per 4.6.10. | *Although having done monitoring and evaluation was implicit in former 4.5.3.2 (i.e., necessary in order to demonstrate progress), this requirement makes it explicit, in alignment with Standard-wide changes to M&E expecations. The obligation to assess GHG emissions on an annual basis at least comes from former 4.5.3.2 guidance.* |
| | | | 4.6.10 | | ***Continuous Improvement*** | *New heading* |
| 4.5.3.2 | | The operating company shall demonstrate progress toward its greenhouse gas reduction targets. | 4.6.10.1 | | At least annually, but without undue delay after a significant change, the ENTITY:<br>a. Review the monitoring and evaluation results, and the ENTITY's effectiveness in meeting the targets required in 4.6.6 and updated as per 4.6.10;<br>b. Review any climate-related grievances and the functioning of its relevant grievance mechanism/s required in Section 1.4.3;<br>c. Review the potential that the magnitude, duration, or probability of the causes and effects of the contributions of the project/operation to climate change, identified in 4.6.2, have changed;<br>a. Develops and implements time-bound corrective measures to update, if necessary , the scoping process in accordance with Section 4.6.5, and the greenhouse gas and energy targets in accordance with Section 4.6.6;<br>b. Develops and implements time-bound corrective measures to update, if necessary , the greenhouse gas and energy management plan in accordance with Section 4.6.7; and<br>c. Develops and implements time-bound corrective measures to update, if necessary, the monitoring and evaluation processes, in accordance with Section 4.6.9. | *Builds on intent of former 4.5.3.2 (monitoring and evaluation of performance on targets set).*<br><br>*The obligation to assess GHG emissions on an annual basis comes from former 4.5.3.2 guidance.*<br><br>*b and c are new sub-requirements*<br><br>*d. to g. build on intent of former 4.5.3.2 (monitoring and evaluation of performance on targets set) but goes into significantly more detail about expectations and the steps required to ensure / demonstrate progress.* |
| | | | ***4.6.11*** | | ***Information-Sharing and Public Reporting*** | *New heading* |
| 4.5.4.2 | | On an annual basis, the operating company or its corporate owner shall:<br><br>a. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards mine-site-level greenhouse gas reduction targets; and efforts taken to reduce emissions from the mining project and mining-related activities; and<br><br>b. Publicly report on mine-site-level or corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions. | 4.6.11.1 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br><br>a. All the Scope 1 and Scope 2 reduction targets required in 4.6.6.1, either at site-level or corporate-level;<br>b. All the Scope 3 reduction targets required in 4.6.6.2, either at site-level or corporate-level; and<br>c. All the energy targets required in 4.6.6.2, either at site-level or corporate-level. | *Drawing on intent of former 4.5.4.2 but with significantly more detail expected in reporting (see also 4.6.12.2 - 4.6.12.5).*<br><br>*b. and c. reflect new expectations re: Scope 3 emissions and energy* |

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| | | | 4.6.11.2 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. All site-specific Scope 1 emissions calculations , verified by a credible third-party expert, as required in 4.6.4.1;<br>b. All site-specific Scope 2 emissions calculations , verified by a credible third-party expert, as required in 4.6.4.1;<br>c. All relevant site-specific Scope 3 emissions calculations/estimates, verified by a credible third-party expert, as required in 4.6.4.2;<br>d. Quantified progress, informed by the review process required in 4.6.11.1, towards meeting the absolute targets for Scope 1 and Scope 2 emissions, and (if relevant) targets for Scope 3 emissions required in 4.6.6;<br>e. The percentage of greenhouse gas emissions reductions (Scope 1, 2 and/or 3) that has been achieved through carbon offsetting (rather than source elimination or reduction), and if carbon offsetting was used, a justification for doing so;<br>f. The site's total energy consumption and use;<br>g. Disaggregated energy consumption data that details, at a minimum, delivered energy, energy from fossil fuels consumed on-site, renewable energy purchased from external suppliers and renewable energy generated at the site;<br>h. Quantified progress towards meeting targets for energy reduction and the proportion of energy consumed that comes from renewable sources (as set in 4.6.6.2); and<br>i. The methods used to measure energy consumption and use, and to calculate Scopes 1, 2 and 3 emissions; | *Drawing on intent of former 4.5.4.2 but with significantly more detail expected in reporting.*<br><br>*c. reflects new expectations re: Scope 3 emissions.*<br><br>*f. to h. are new: energy consumption was not considered in 2018 Standard.*<br><br>*i. is a new subrequirement, to increase transparency regarding calculation methods.* |
| | | | 4.6.11.5 | | At least annually, the ENTITY makes publicly accessible updated versions of, and maintains publicly accessible all previous versions of:<br>a. Key findings of the monitoring and evaluation process required in 4.6.9, and of the review process required in 4.6.10.1, for the reporting period;<br>b. A list of the time-bound corrective measures related to its greenhouse gas and energy management plan, identified as per 4.6.10.2, for the reporting period; and<br>c. A list of the time-bound corrective measures related to its monitoring and evaluation processes, identified as per 4.6.10.2, for the reporting period. | *Drawing on intent of former 4.5.4.2, in particular, progress toward GHG reduction targets, but with significantly more detail expected in reporting.* |
| 4.5.4.1 | | The greenhouse gas policy shall be publicly available. | | | | *Replaced by much more detailed reporting requirements in requirements 4.6.12.1-4.6.12.5)* |