

Assessment of IRMA alignment with WTO Principles for Development of International Standards

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ASI (WO-4060)

Prepared for IRMA

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About ASI

ASI – Assurance Services International – is an assurance partner for leading worldwide voluntary sustainability standards and initiatives.

Our vision is a world where sustainability claims are trustworthy.

Our mission is to safeguard the credibility of sustainability initiatives by providing global assurance services.

ASI's purpose: We enable and distinguish sustainability systems that drive positive environmental and social impact.

Founded in 2006 by the Forest Stewardship Council (FSC) we provide oversight and international accreditation to several social and environmental initiatives. We have over two decades of experience in addressing social, economic, and environmental sustainability issues in global supply chains for various sectors such as agriculture, marine, aquaculture, energy, forestry, mining, textile, manufacturing, and tourism.

We conduct assessments of ISO standards and scheme-specific requirements that are aligned with common social and environmental standards such as SA 8000, ILO Core Conventions, UNGPs for Business and Human Rights, and environmental and occupational health and safety management systems.

We also provide other complimentary assurance services, such as:

- Developing bespoke assurance systems and evaluating their performance.
- Integrity and risk management using forensic, traceability and anti-fraud techniques to investigate and prevent fraudulent practices in global supply chains.
- Tailored training and workshops that draw on our global on-ground experience in applying social and environmental standard systems.

ASI is headquartered in Bonn, Germany with one subsidiary, ASI Asia Pacific in Kuala Lumpur, Malaysia, and a sister company ASI North America in Washington DC, USA. With over 100 team members across 35 countries, ASI is a truly global organization with experts in forestry, fisheries, aquaculture, dispute systems, human rights, fraud examinations, and much more.

With our global presence, the ASI team works together to achieve our mission: We are the world's choice when confidence in claims is needed. Read more about us on our website: www.asi-assurance.org.

Since 2020, ASI has established strong partnerships with National (DAkkS, UKAS, Accredia) and International Accreditation Bodies (our sister company - ASI North America) to provide oversight services that comply with the EU and UK Accreditation regulations, which align with emerging regulations related to sustainability certifications and supply chain due diligence.

Introduction

This report documents the findings of ASI's independent assessment commissioned by Initiative for Responsible Mining Assurance (IRMA) to evaluate its alignment with the World Trade Organization (WTO) Principles for the Development of International Standards, Guides and Recommendations. This assessment was conducted in response to a growing need for clarity on how IRMA's standards align with those guidelines set forth by the WTO. It identifies areas of alignment and those requiring enhancement to achieve full conformity with WTO principles.

The scope of the assessment included:

1. Reviewing the WTO Principles for the Development of International Standards and evaluating IRMA's self-assessment against these Principles and complementing it with additional research and documentation based on IRMA's policies, procedures, and practices.
2. Delivering this report which includes a table capturing assessment details alongside a narrative analysis for public dissemination.

This report was prepared within a 3-day budget by ASI Strategic Development Team.

Disclaimer: This assessment aims to facilitate understanding of how the IRMA system aligns with WTO Principles for the Development of International Standards, Guides and Recommendations. It is developed based on ASI's interpretation of the referenced WTO document. Please note that the WTO holds the ultimate authority on the interpretation of its principles.

Executive summary

IRMA demonstrates a high level of alignment with [WTO Principles for the Development of International Standards, Guides and Recommendations](#) across its governance structure, documentation, and operational practices. The initiative actively engages stakeholders through transparent standard development and revision processes, ensuring that existing standards and draft versions are accessible on its website along with a community toolkit available in multiple languages. Public consultations use the [ISEAL Code of Good Practice](#) as a reference, reinforcing IRMA's commitment to openness and impartiality. IRMA carefully considers stakeholders' views and comments, providing timely feedback on how these inputs were incorporated into the development or revision of standards. Concerns and disagreements raised during the standard development process are recorded and presented to IRMA's Board of Directors. Decisions are made in accordance with [IRMA's Bylaws](#), which require the Board to strive to make decisions by consensus. See Table 1 below for an overview of IRMA's alignment with WTO principles.

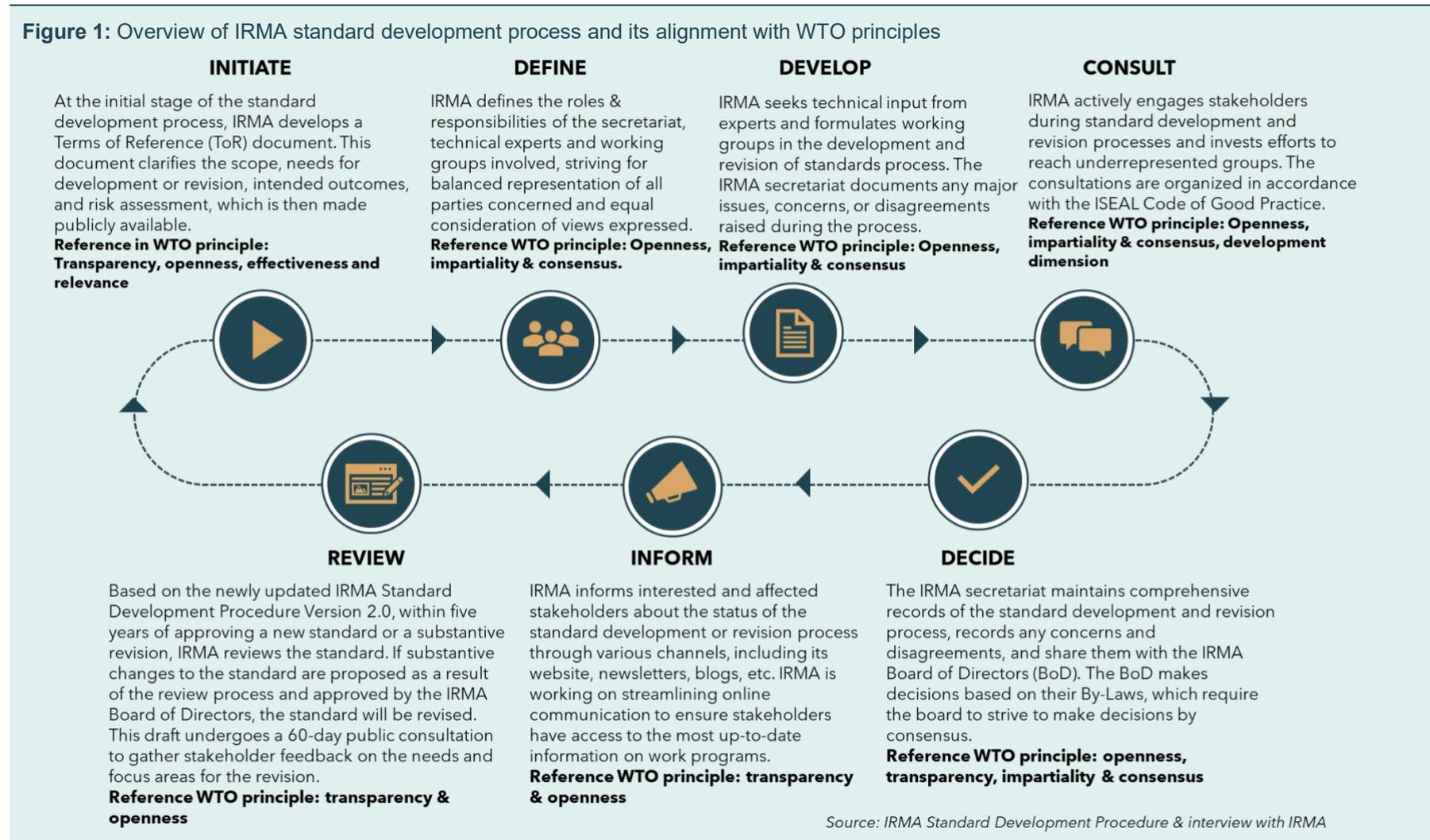
Table 1: Summary of IRMA alignment with WTO Principles

WTO Principle	Overview	Summary of alignment
1. Transparency	Fully aligned	IRMA is fully aligned with the Transparency Principle. It offers detailed information on draft standards at the start of the consultation period through publicly available documents, such as the Public System Report and Terms of Reference for the revision process. IRMA provides sufficient time for stakeholder comments and incorporates this feedback into the development of standards. IRMA publishes its work program via blogs and newsletters (example here), offering updates on current standards and future plans. IRMA actively engages stakeholders during standard development and revision processes and invests efforts to reach underrepresented groups. The consultations are organized using the ISEAL Code of Good Practice as a reference.
2. Openness	Fully aligned	IRMA is fully aligned with the Openness Principle. Membership is open on a non-discriminatory basis to relevant bodies, and IRMA ensures stakeholder participation throughout the standards development process. It continuously collects and records comments and suggestions through its Feedback and Complaints Mechanism , and organizes extensive webinars during the consultation phase for technical discussions on proposed revisions. Technical experts are engaged, and working groups are formed to support the development process. Participation in these working groups is advertised through open calls and is accessible to all interested parties. IRMA's Standard Development Procedure Version 2.0 (effective July 2024) formalizes requirements for public consultation and specifies the information to be circulated, ensuring that stakeholders are involved early in the proposal, scoping, and acceptance of new work items. The procedure explicitly supports structured feedback on whether and how standards should be revised.
3. Impartiality and Consensus	Fully aligned	IRMA is fully aligned with the Impartiality and Consensus Principle. The organization ensures impartiality through its well-established internal system and IRMA secretariat, which involves technical experts and working groups that strives for balanced representation of all parties interested (examples here and here). Concerns and disagreements raised during the standard development process are recorded and submitted to the IRMA Board of Directors. This Board, which includes equal representatives from six houses (information on current Board composition here), strives to make decisions based on consensus.

		as required by IRMA Bylaws . To further enhance transparency and accessibility, IRMA has updated the Standard Development Procedure Version 2.0 . This includes detailed requirements for the final report to the Board, covering main issues, how concerns were addressed, and other key elements of the process.
4. Effectiveness and Relevance	Fully aligned	IRMA is fully aligned with the Effectiveness and Relevance Principle. Within five years of approving a new or substantively revised standard, the IRMA Secretariat conducts a review to assess its continued relevance and effectiveness. Additionally, based on the IRMA Terms of Reference document outlining the objectives, scope, and desired outcomes of the IRMA Standard Version 2.0, IRMA conducts risk assessments at the start of the standard development process. These assessments emphasize the importance of harmonization with relevant regulatory and market needs, as well as the monitoring of technological and scientific advancements, to ensure the standard remains adaptable and responsive to industry changes.
5. Coherence	Fully aligned	IRMA demonstrates coherence with other international standards in the mining sector by actively participating in relevant working groups and aligning its standards with global guidelines. IRMA engages in initiatives related to environmental due diligence, responsible recycling, and mining standards to contribute to the broader sustainability efforts in the sector. For example, IRMA contributed to the development of the OECD Handbook on Environmental Due Diligence in Mineral Supply Chains by serving on the OECD Expert Working Group. IRMA also participated in the GRI Expert Working Group responsible for the creation of the GRI Mining Sector Standard . Additionally, IRMA collaborates with bodies such as the Roundtable on Responsible Recycling of Metals and ISO . Through these efforts, IRMA contributes to creating synergy in sustainability standards rather than duplicating existing efforts.
6. Development Dimension	Fully aligned	IRMA supports stakeholder engagement by utilizing various communication methods, including newsletters, emails, phone calls, website updates, webinars, and in-person workshops. During the public consultation period for the IRMA Standard V2.0, the Secretariat proactively reaches out to underrepresented groups, such as mining-affected communities and Indigenous Peoples, to gather their feedback. Additionally, IRMA's feedback and complaint mechanisms and the issue resolution system offer translation support and multiple submission channels to accommodate stakeholders with limited English proficiency or technology resources, ensuring their voices are heard in the standard development process.

IRMA and ASI have collaboratively identified areas for further improvement to continuous and consistently demonstrate alignment with WTO principles. For example, IRMA is working on enhancing and streamlining communication about the timeline and status of work programs to ensure stakeholders have access to the most current information. Additionally, IRMA has clarified the review process requirements in its Standard Development Procedure Version 2.0, ensuring that not only updated drafts with proposed changes are made available for public consultation but also areas and issues being reviewed, enabling feedback from all parties on the need for revisions. See Figure 1 below for a diagram illustrating how IRMA's standard development process aligns with WTO principles.

Figure 1: Overview of IRMA standard development process and its alignment with WTO principles



Assessment details

The table below presents a comprehensive assessment of the alignment between the IRMA system and WTO principles for the Development of International Standards, Guides, and Recommendations. It incorporates the original principles from the WTO, references from ISO/IEC Guide 59:2019 providing guidelines for implementing good standardization practices that support WTO principles. Additionally, it includes IRMA's original self-assessment, and the ASI assessment which builds upon IRMA's self-assessment and is complemented by reviews of WTO and ISO/IEC documents, along with research on the IRMA system.

LEGEND

- Fully Aligned: IRMA's normative documents and practices fully comply with WTO principles
- Mostly Aligned: Some of IRMA's normative documents and/or practices require adjustments to fully comply with WTO principles.

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
1. Transparency	All essential information regarding current work programmes, as well as on proposals for standards, guides and recommendations under consideration and on the final results should be made easily accessible to at least all interested parties in the territories of at least all WTO Members.	4.2.1 Transparency implies that sufficient and regularly updated information is easily accessible in due time to allow all interested parties to participate in the standardization process if they want to.	Standards are freely accessible on the IRMA website, including draft standards. In addition to the full IRMA Standard, a Community Toolkit is available in multiple languages with summary presentations, flyers, graphics, animations, and other tools that aim to optimize accessibility of the IRMA Standard and system. Stakeholders have opportunities to engage in standards development through working groups, written comments, webinars across multiple time zones, and in-person meetings. Translation is provided in multiple IRMA webinars.	<ul style="list-style-type: none"> ● Fully Aligned IRMA makes its standards and supporting tools publicly available and offers multiple channels for stakeholder participation in consultations and feedback. In addition to the IRMA standard online commenting form, stakeholders can submit comments via WhatsApp, email, and postal mail on an ongoing basis. <p>Opportunities for improvement: IRMA is currently in the process of streamlining information on its website regarding communication on work programs and enhancing the mechanism for periodic updates on the development or revision status of its standards, ensuring stakeholders have easy access to the most</p>

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
				up-to-date information on the IRMA system and its standards.
	Procedures should be established so that adequate time and opportunities are provided for written comments.	4.2.2 The national body should have appropriately documented procedures to support its standards management and development processes. These procedures should be up to date and freely available to any stakeholder.	Stakeholders and rights holders have extensive opportunities to provide written comments. The 90-day comment period exceeds ISEAL Code of Good Practice requirements.	<ul style="list-style-type: none"> ● Fully Aligned IRMA actively engages stakeholders during standard development and revision process and invest efforts to reach underrepresented groups. The consultations are organized using the ISEAL Code of Good Practice as a reference. In addition, IRMA has a system in place to collect and record comments and suggestions on its standards and their implementation on an ongoing basis, such as through its Feedback and Complaints Mechanism here.
	The information on these procedures should be effectively disseminated.		Multiple notices regarding IRMA standard development are provided on the IRMA website and through the IRMA newsletter and social media, as well as a series of webinars, discussions, presentations, and engagement sessions.	
	In providing the essential information, the transparency procedures should, at a minimum, include: 1. the publication of a notice at an early appropriate stage, in such a manner as to	4.2.3 When a new standard is proposed, the national body should make this information publicly available at an early stage in the standards development process, so that stakeholders can follow or take an active part in the	Multiple notices regarding IRMA standard development are provided on the IRMA website and through the IRMA newsletter and social media, as well as a series of webinars, discussions, presentations, and engagement sessions.	<ul style="list-style-type: none"> ● Fully Aligned At the initial stage of the standard development process, IRMA develops and publishes a Terms of Reference (ToR) document. This document clarifies background information, the scope, needs for development or revision, intended

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
	<p>enable interested parties to become acquainted with it, that the international standardizing body proposes to develop a particular standard;</p>	<p>process as participants. A brief description of the scope of the draft standard, including its objective and rationale should be provided. The notice used to communicate this proposal should be clear and easily understood by all stakeholders.</p>		<p>outcomes, and risk assessment and other relevant information (example here).</p> <p>In addition, IRMA outlines key milestones in the standard development and review process. This includes the initiation of the revision process, ongoing draft development stages, and the scheduled public consultation dates, etc.</p> <p>Opportunities for improvement: Adding version history to IRMA system documents and standards and maintaining an updated timeline on process webpages would further enhance transparency and accessibility for all stakeholders involved.</p>
	<p>2. the notification or other communication through established mechanisms to members of the international standardizing body, providing a brief description of the scope of the draft standard, including its objective and rationale. Such communications shall take place at an early appropriate stage, when amendments can still be introduced and comments taken into account;</p>			

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
	3. upon request, the prompt provision to members of the international standardizing body of the text of the draft standard;	4.2.4 Participants should receive all draft documents and should be informed of the action taken on any comments they have made relating to drafts.	Full draft standards circulated via newsletter, social media, website, and webinars.	<ul style="list-style-type: none"> ● Fully Aligned IRMA publishes the standard under revision and its supporting documents online. Summaries of public comments and IRMA's responses are also made available following consultations.
	4. the provision of an adequate period of time for interested parties in the territory of at least all members of the international standardizing body to make comments in writing and take these written comments into account in the further consideration of the standard;	4.2.5 Once consensus is reached and the draft standard is ready for open consultation, it should be made available to stakeholders. At least 60 days should be provided to allow stakeholders the opportunity to submit written comments. This period may, however, be shortened in cases where urgent problems of safety, health or environment should be addressed. A clear and well-understood procedure should be in place for the management of these comments (see 5.10).	Stakeholders and rights holders have extensive opportunities to provide written comments. The 90-day comment period exceeds ISEAL Code of Good Practice requirements.	<ul style="list-style-type: none"> ● Fully Aligned IRMA has a <u>Standard Development Procedure</u> that outlines specific requirements for conducting public consultations during both the development and revision of standards. This procedure also includes guidelines for managing and addressing comments received during these consultations.

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
	5. the prompt publication of a standard upon adoption; and	4.2.6 Information on current versions of standards as well as on historical and withdrawn standards should be made available by adequate means such as via websites, subscriptions, etc.	Final standard is publicly accessible via the IRMA website and announced in the IRMA newsletter and social media.	<ul style="list-style-type: none"> ● Fully Aligned IRMA standard development procedure specified that if the new standard or revised standard receives the approval of the IRMA Board of Directors the standard shall be published within 30 days on the IRMA website. The website also provides access to both current and historical versions of standards. For instance, the IRMA Mining Standard has a dedicated landing page on the IRMA website, clearly presenting both current and historical versions of the standard, along with guidance on its application.
	6. to publish periodically a work programme containing information on the standards currently being prepared and adopted.	4.2.7 The national body should make an up-to-date work programme available publicly. The standards work programme should contain relevant information, as described in 5.9.	Updates are provided in working groups and via the IRMA newsletter, website, and social media.	<ul style="list-style-type: none"> ● Fully Aligned Updates on the standards work program are publicly available on the IRMA webpage, newsletters, blogs and other channels. <p>Opportunities for improvement: IRMA continuously enhances communication about its work program through various channels to ensure stakeholders receive the most current information. To further improve accessibility, IRMA plans to establish a timeline on the program page for easier reference.</p>

WTO Principles	ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
	<p>It is recognized that the publication and communication of notices, notifications, draft standards, comments, adopted standards or work programmes electronically, via the Internet, where feasible, can provide a useful means of ensuring the timely provision of information. At the same time, it is also recognized that the requisite technical means may not be available in some cases, particularly with regard to developing countries. Accordingly, it is important that procedures are in place to enable hard copies of such documents to be made available upon request.</p>	<p>A summary of comments and responses is made available on the IRMA website. Hard copies are made available upon request.</p>	<ul style="list-style-type: none"> ● Fully Aligned IRMA provides hard copies of draft and final standards as well as audit reports upon request.

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
2. Openness	<p>Membership of an international standardizing body should be open on a non-discriminatory basis to relevant bodies of at least all WTO Members. This would include openness without discrimination with respect to the participation at the policy development level and at every stage of standards development, such as the:</p> <ol style="list-style-type: none"> 1. proposal and acceptance of new work items; 	<p>4.3.1 Participation in standards development should be open at all stages of the standards development process on a non-discriminatory basis to all interested parties. This includes participation at every stage of standards development, such as the following:</p> <ul style="list-style-type: none"> - proposal and acceptance of new work items; 	<p>Anyone, in any country, may submit comments and suggestions on any aspect of the IRMA Standards and system, including during public engagement periods on draft standards development and at any time through the IRMA complaints and feedback mechanism.</p>	<ul style="list-style-type: none"> ● Fully Aligned Throughout its standard development process, IRMA collects and records comments and suggestions through its <u>Feedback and Complaints Mechanism</u> to continuously collect feedback on its standards. In addition, IRMA maintains an internal system for reviewing and deciding whether to revise its standard, with comprehensive records including internal meeting notes and minutes from IRMA board meetings. Lastly, IRMA's <u>Standard Development Procedure Version 2.0</u>, effective July 2024, formalizes requirements for public consultation and specifies the information to be circulated, ensuring that stakeholders are involved early in the proposal, scoping, and acceptance of new work items. The procedure explicitly supports structured feedback on whether and how standards should be revised.
	<ol style="list-style-type: none"> 2. technical discussion on proposals; 	<ul style="list-style-type: none"> - technical discussion on proposals; 	<p>IRMA Expert Working Groups on a range of topics are open to all participants, based on self-nomination and nomination of others. The IRMA Secretariat seeks balanced</p>	<ul style="list-style-type: none"> ● Fully Aligned IRMA seeks technical input from experts and formulates working groups in the development and revision of standards process. IRMA strives to achieving balanced

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
			representation in working groups across geography, sector, gender, and relevant subject-matter expertise.	engagement across sectors, genders, and geographies, with particular attention to communities and Indigenous people affected (See example here). These working groups are not required to reach consensus, and the IRMA secretariat documents any major issues, concerns, or disagreements raised during the process, for the review and decision-making by its Board of Directors.
	3. submission of comments on drafts in order that they can be taken into account;	- submission of comments on drafts;	IRMA provided a robust 90-day public comment period with multiple webinars across time zones and ample opportunities to submit comments.	<ul style="list-style-type: none"> ● Fully Aligned IRMA actively engages stakeholders during standard development and revision process and invest efforts to reach underrepresented groups. The consultations are organized in using the ISEAL Code of Good Practice as a reference.
	4. reviewing existing standards;	- review of existing standards;	IRMA regularly reviews existing standards and external critiques across standards to inform standards development.	As above – 4.3.1 in ISO/IEC GUIDE 59:2019
	5. voting and adoption of standards; and	- resolution of comments and approval of standards;	IRMA Standards are adopted by the IRMA Board of Directors with equal authority across its six houses: mining	<ul style="list-style-type: none"> ● Fully Aligned The IRMA secretariat maintains comprehensive records of the standard

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		companies, purchasing companies, NGOs, affected communities, organized labor, and the investor and finance sector.	development and revision process, records any concerns and disagreements, and share them with the IRMA Board of Directors (BoD). The BoD strives to make decisions based on consensus, as mandated by their By-Laws.
	6. dissemination of the adopted standards.	IRMA Standards are disseminated via the IRMA website, where they are freely accessible to the public, as well as via the IRMA newsletter and social media. Hard copies of standards are made available upon request.	<ul style="list-style-type: none"> ● Fully Aligned IRMA standard development procedure specified that if the new standard or revised standard receives the approval of the IRMA Board of Directors the standard shall be published within 30 days on the IRMA website.
Any interested member of the international standardizing body, including especially developing country Members, with an interest in a specific standardization activity should be provided with meaningful opportunities to participate at all stages of standard development. It is noted that	4.3.2 National bodies should facilitate the participation of a range of interested parties appropriate to each standard under development. This should not be contingent on membership of any specific organization. 4.3.3 The national body should promote and enable	IRMA Expert Working Groups on a range of topics are open to all participants, based on self-nomination and nomination of others. The IRMA Secretariat seeks balanced representation in working groups across geography, sector, gender, and relevant subject-matter expertise. Public engagement on IRMA Standards is open to all through a robust engagement process including	<ul style="list-style-type: none"> ● Fully Aligned IRMA seeks technical input from experts and formulates working groups in the development and revision of standards process. IRMA strives to achieving balanced engagement across sectors, genders, and geographies, with particular attention to the needs of developing countries and public sectors, stakeholders and rights holders in those countries (See example here). In addition, though these working groups are not required to reach consensus, the IRMA

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<p>with respect to standardizing bodies within the territory of a WTO Member that have accepted the Code of Good Practice for the Preparation, Adoption and Application of Standards by Standardizing Bodies (Annex 3 of the TBT Agreement) participation in a particular international standardization activity takes place, wherever possible, through one delegation representing all standardizing bodies in the territory that have adopted, or expected to adopt, standards for the subject-matter to which the international standardization activity relates. This is illustrative of the importance of participation in the international standardizing process accommodating all relevant interests.</p>	<p>the involvement of all interested parties, including those potentially under-represented, such as small and medium-sized enterprises and representatives of societal interests. National bodies can consider putting in place awareness-raising activities, as well as procedures for monitoring the participation of different categories of interested parties.</p> <p>4.3.4 The national body should promote its commitment to openness by maintaining and making publicly available its standards development procedures, which address issues such as conditions for participation (e.g. membership, participation fees, waiver provisions, copyright and privacy obligations).</p>	<p>webinars across multiple time zones and in many cases with translation.</p>	<p>secretariat documents any major issues, concerns, or disagreements raised during the process, for discussion with its Board of Directors. In addition, IRMA actively engages stakeholders during standard development and revision process and invest efforts to reach underrepresented groups. The consultations are organized using the ISEAL Code of Good Practice as a reference.</p>

WTO Principles		ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
3. Impartiality & Consensus	All relevant bodies of WTO Members should be provided with meaningful opportunities to contribute to the elaboration of an international standard so that the standard development process will not give privilege to, or favour the interests of, a particular supplier/s, country/ies or region/s. Consensus procedures should be established that seek to take into account the views of all parties concerned and to reconcile any conflicting arguments.	4.4.2 When addressing consensus and impartiality, the national body should provide an impartial and neutral platform for its standards development work, with equal access for all interested parties. The work is expected to be conducted in a consensual and impartial manner, where no party is favoured over another. No one organization or participant category should dominate the standards development process. Furthermore, the national body should examine its governance structure, which should support neutrality with respect to the representation of specific private or public interests across all its relevant governing bodies.	IRMA is equally governed by six houses: mining companies, purchasing companies, NGOs, affected communities, organized labor, and the investor and finance sector. Each house has two representatives on the IRMA Board of Directors. Board members strive to make decisions by consensus. Where they cannot achieve this, they agree to vote. However, any vote that results in two “no” votes from the same sector does not pass and the issue must go back to the full group for further discussion and resolution. This means that a topic cannot pass if one of the stakeholder groups is fundamentally opposed. Anyone, from any geographic region, may comment on IRMA’s standards, system, and any aspect of IRMA’s work.	<ul style="list-style-type: none"> ● Fully Aligned <p>The IRMA secretariat maintains comprehensive records of the standard development and revision process, records any concerns and disagreements, and share them with the IRMA Board of Directors (BoD). The BoD strives to make decisions based on consensus, as mandated by their By-Laws. This process is explained in multiple publicly available documents, including IRMA Standard Development Procedure Version 2.0, public system report, etc.</p>

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	<p>Impartiality should be accorded throughout all the standards development process with respect to, among other things:</p> <p>1. access to participation in work;</p>	<p>4.4.1 Impartiality should be accorded throughout the standards development process with respect to the following (among other things):</p> <p>- access to participation in work;</p>	<p>Anyone, from any geographic region, may comment on IRMA's standards, system, and any aspect of IRMA's work.</p>	<p>● Fully Aligned</p> <p>Technical experts are engaged, and working groups are formed to support the development process. Participation in these working groups is advertised through open calls and is accessible to all interested parties. IRMA strives to achieving balanced engagement across sectors, genders, and geographies, with particular attention to the needs of developing countries and public sectors, stakeholders and rights holders in those countries (See example here).</p>
	<p>2. submission of comments on drafts;</p>	<p>- submission of comments on drafts;</p>	<p>Anyone, from any geographic region, may comment on IRMA's standards, system, and any aspect of IRMA's work.</p>	<p>● Fully Aligned</p> <p>IRMA actively engages stakeholders during standard development and revision process and invest efforts to reach underrepresented groups. The consultations are organized using the ISEAL Code of Good Practice as a reference.</p>
	<p>3. consideration of views expressed and comments made;</p>	<p>- consideration of views expressed and comments made;</p>	<p>IRMA carefully reviews all comments submitted in the public consultation process and provides a summary on the IRMA website. IRMA also has a</p>	<p>● Fully Aligned</p> <p>The IRMA secretariat maintains comprehensive records of the comments received and provide feedback on how the</p>

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			complaints and feedback mechanism that timely considers and responds to comments related to the IRMA standards and any aspect of IRMA's work.	comments are considered in the development of the updated standard draft.
	4. decision-making through consensus;	- decision-making through consensus;	Board members strive to make decisions by consensus. Where they cannot achieve this, they agree to vote. However, any vote that results in two "no" votes from the same sector does not pass and the issue must go back to the full group for further discussion and resolution. This means that a topic cannot pass if one of the stakeholder groups is fundamentally opposed.	<ul style="list-style-type: none"> ● Fully Aligned <p>Concerns and disagreements raised during the standard development process are recorded and submitted to the IRMA Board of Directors. This Board, which includes representatives from various sectors (information current Board composition here), strives to make decisions based on consensus, as required by IRMA Bylaws. To further enhance transparency and accessibility, IRMA has updated the Standard Development Procedure Version 2.0. This includes detailed requirements for the final report to the Board, covering main issues, how concerns were addressed, and other key elements of the process.</p>
	5. obtaining of information and documents;	- obtaining information and documents;	Information and documents are made available to the public through the IRMA website.	<ul style="list-style-type: none"> ● Fully Aligned

WTO Principles	ISO/IEC GUIDE 59:2019	IRMA self-assessment	ASI assessment
			Information and documents are made available to the public through the IRMA website.
	6. dissemination of the international standard;	- availability of draft and approved standards;	<ul style="list-style-type: none"> ● Fully Aligned Information and documents are made available to the public through the IRMA website.
	7. fees charged for documents;	-	<ul style="list-style-type: none"> ● Fully Aligned The standard is freely available for download on the IRMA website.
	8. right to transpose the international standard into a regional or national standard; and	-	<ul style="list-style-type: none"> ● Fully Aligned

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		responsible management of the mining sector.	
9. revision of the international standard.	- revision of the standard.	IRMA Standards are reviewed and updated every 3 to 5 years, in line with ISEAL's Code of Good Practice.	<ul style="list-style-type: none"> ● Fully Aligned Technical experts are engaged, and working groups are formed to support the revision process. Participation in these working groups is advertised through open calls and is accessible to all interested parties. IRMA strives to achieving balanced engagement across sectors, genders, and geographies, with particular attention to the needs of developing countries and public sectors, stakeholders and rights holders in those countries (See example here).
-	4.4.3 The national body should have a standardization process that remains collaborative and consensus-based, and that takes into account all views expressed and brings together diverging opinions. Whenever referring to consensus, the national body should cite its	-	<ul style="list-style-type: none"> ● Fully Aligned Concerns and disagreements raised during the standard development process are recorded and submitted to the IRMA Board of Directors. This Board, which includes representatives from various sectors (information current Board composition here), strives to make decisions based on consensus as required by IRMA Bylaws. To further enhance transparency and accessibility, IRMA has updated the

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		<p>definition in full, along with a precise reference to its source (see 3.2).</p> <p>4.4.4 The national body should assist its participants and those leading the process in building consensus. For this, the good practices below are recommended.</p>		<p>Standard Development Procedure Version 2.0. This includes detailed requirements for the final report to the Board, covering main issues, how concerns were addressed, and other key elements of the process.</p>
	-	<p>4.4.5 The national body should protect the standards development process, ensuring its integrity, avoiding taking a technical position on the standards under consideration, and keeping an impartial and independent position by providing the opportunity for representation by an appropriate balance of interests in the standards development process</p>	-	<p>● Fully Aligned As above – 4.4.3 in ISO/IEC GUIDE 59:2019</p>

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4. Effectiveness and Relevance	In order to serve the interests of the WTO membership in facilitating international trade and preventing unnecessary trade barriers, international standards need to be relevant and to effectively respond to regulatory and market needs, as well as scientific and technological developments in various countries. They should not distort the global market, have adverse effects on fair competition, or stifle innovation and technological development. In addition, they should not give preference to the characteristics or requirements of specific countries or regions when different needs or interests exist in other countries or regions. Whenever possible, international standards should be performance	<p>4.5.1 The national body should take account of relevant regulatory or market needs, as well as of scientific and technological advances in the development of standards.</p> <p>4.5.2 The national body should develop new standards that do not</p> <ul style="list-style-type: none"> - distort the market; - have adverse effects on fair competition; - stifle innovation and technological development, - have adverse effects on the environment; - comply with sustainable development principles. 	IRMA Standards development takes into consideration compatibility with existing and emerging technologies, while not requiring use of a particular technology. Leading scientific and technical knowledge is taken into consideration through expert working groups and robust research that informs standard development, as well as through comments submitted in the public consultation process. IRMA is an active ISEAL Community Member, engaging with other standards bodies to ensure effectiveness, relevance, and good practice in our standards and system. IRMA actively engages with governments, stakeholders, and rights holders around the world to remain responsive to leading practices in a wide range of law and policy frameworks, from international and regional frameworks to those of developed and developing countries, and proactively seeks to remain aware of and responsive to practical experiences across sectors regarding implementation of good practice at the site level.	<p>● Fully Aligned</p> <p>IRMA is fully aligned with the Effectiveness and Relevance Principle. Within five years of approving a new or substantively revised standard, the IRMA Secretariat conducts a review to assess its continued relevance and effectiveness. Additionally, based on the IRMA Terms of Reference document outlining the objectives, scope, and desired outcomes of the IRMA Standard Version 2.0, IRMA conducts risk assessments at the start of the standard development process. These assessments emphasize the importance of harmonization with relevant regulatory and market needs, as well as the monitoring of technological and scientific advancements, to ensure the standard remains adaptable and responsive to industry changes.</p>

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	<p>based rather than based on design or descriptive characteristics. Accordingly, it is important that international standardizing bodies:</p> <ol style="list-style-type: none"> 1. take account of relevant regulatory or market needs, as feasible and appropriate, as well as scientific and technological developments in the elaboration of standards; 			
	<ol style="list-style-type: none"> 2. put in place procedures aimed at identifying and reviewing standards that have become obsolete, inappropriate or ineffective for various reasons; and 	<p>4.5.3 The national body should put in place procedures aimed at identifying and reviewing standards that have become obsolete, inappropriate or ineffective for various reasons. All standards should be reviewed on a periodic basis and revised in a timely manner, to be relevant in</p>	<p>IRMA Standards are updated every 3 to 5 years in line with the ISEAL Code of Good Practice to ensure that standards remain relevant, appropriate, and effective. The practical use of the IRMA Standard is tested through IRMA's third-party audits that assess mine sites against the IRMA Standard and provide scores and rationale for scoring. The audit process provides opportunities for feedback from all sectors, as well as from IRMA Certification Bodies,</p>	<ul style="list-style-type: none"> ● Partially Aligned Throughout its standard development process, IRMA collects and records comments and suggestions through its Feedback and Complaints Mechanism to continuously collect feedback on its standards. In addition, IRMA maintains an internal system for reviewing and deciding whether to revise its standard, with comprehensive records including internal meeting notes and minutes from IRMA board meetings. However, in the revision

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		<p>the context of changing market or regulatory needs and new scientific and technological developments.</p> <p>4.5.4 Proposals for the development of new or revised standards, when submitted according to appropriate procedures by any materially and directly interested person or organization, wherever located, should be given prompt consideration. For basic standards, the modification or withdrawal can impact other projects and interested parties. Therefore, in relation to modification or withdrawal of standards, the committee should consider the use of current and historical versions. Special attention should be given to other standards making normative reference to basic</p>	<p>regarding the practical use of each requirement in the IRMA Standard and any need for clarifications or updates. Clarifications are provided in a guidance document, especially useful where clarifications are necessary between major standard review and revision periods.</p>	<p>of IRMA standard Version 2.0, a formal consultation or public review process was not conducted for the proposal and acceptance stage. Recognizing this gap in stakeholder engagement at the initial proposal and acceptance stage, IRMA has addressed this in its Standard Development Procedure Version 2.0, effective July 2024. This updated procedure now includes requirements for public consultations and specifies the content to be circulated, ensuring stakeholders are involved early in the proposal and acceptance of new work items. It facilitates gathering feedback on whether and how standards should be revised.</p>

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		standards. As good practice, the national body should make available historical versions of standards, when applicable. If historical versions are available, the status of the standard should be clearly stated, e.g. if it is a withdrawn standard or a superseded standard.		
	3. put in place procedures aimed at improving communication with the World Trade Organization.		IRMA remains open to communication with the World Trade Organization and welcomes opportunities to engage with the WTO and its Members.	● Fully Aligned
5. Coherence	In order to avoid the development of conflicting international standards, it is important that international standardizing bodies avoid duplication of, or overlap with, the work of other international standardizing bodies. In this respect,	4.6.3 As early as possible, each national body should provide information publicly via suitable methods regarding its work programme, especially for new projects, to assist in understanding where overlaps and duplications	IRMA avoids conflicting international standards and duplication of standards by incorporating leading international frameworks into the IRMA Standard and by actively participating in working groups (e.g. GRI, OECD, and others) to achieve coherence and high-level, comprehensive standards. IRMA is an active ISEAL Community Member,	● Fully Aligned IRMA demonstrates coherence with other international standards in the mining sector by actively participating in relevant working groups and aligning its standards with global guidelines. For example, IRMA engages in initiatives related to environmental due diligence, responsible recycling, and mining standards to contribute to the broader

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	cooperation and coordination with other relevant international bodies is essential.	can occur and to support early engagement and participation of interested parties. 4.6.4 to 4.6.7.	engaging with other standards bodies to ensure effectiveness, relevance, and good practice in our standards and systems.	sustainability efforts in the sector. By collaborating with bodies such as the OECD , ISO , GRI , and Roundtable on the Responsible Recycling of Metals , IRMA contributes to creating synergy in sustainability standards rather than duplicating existing efforts.
6. Development Dimension	Constraints on developing countries, in particular, to effectively participate in standards development, should be taken into consideration in the standards development process. Tangible ways of facilitating developing countries' participation in international standards development should be sought. The impartiality and openness of any international standardization process requires that developing countries are not excluded de facto from the process. With respect to improving participation by	4.7.1 At national level, national bodies should make efforts to engage potentially underrepresented interested parties in the development of national standards and consider appropriate means to enhance their participation. It is important to consider the scope of the standard and the impact it can have on relevant groups in the country. 4.7.2 To improve the accessibility of information regarding standardization activities for those who are underrepresented, it is also important to consider how	IRMA regularly offers technical support, translation and interpretation services, and both virtual and in-person engagement for a range of stakeholders and rights holders who may face resource and/or connectivity barriers to engagement. This is part of our ongoing commitment to achieving balanced engagement across sectors, genders, and geographies, with particular attention to the needs of developing countries and public sector stakeholders and rights holders in those countries.	<ul style="list-style-type: none"> ● Fully Aligned <p>During the public consultation period for the IRMA Standard V2.0, the IRMA secretariat proactively reaches out to underrepresented groups, such as mining-affected communities and Indigenous Peoples, to gather their feedback. Additionally, IRMA's feedback and complaint mechanisms and the issue resolution system offer translation support and multiple submission channels to accommodate stakeholders with limited English proficiency or technology resources, ensuring their voices are heard in the standard development process.</p> <p>Particular attention has been paid in more recent standard development and stakeholder engagement processes to accommodate the needs of visually-impaired persons and persons with sensory</p>

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	<p>developing countries, it may be appropriate to use technical assistance, in line with Article 11 of the TBT Agreement. Provisions for capacity building and technical assistance within international standardizing bodies are important in this context.</p>	<p>drafts and finalized documents are disseminated, e.g. whether these outputs be read by assistive technology, such as screen readers for visually impaired persons.</p>		<p>disability and/or impairment. This includes providing printed hard copies of draft standards to DeafBlind activists, using large font sizes for visually impaired readers in email communications, and incorporating color-blind friendly palettes in the second draft currently under Board review.</p>