Initiative for Responsible
Mining Assurance
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April 19, 2026

Malesela Thema
Lesaneng Community Development Forum
389 Phase 2, Sterrkwater Ga-Pila
Mokopane 0602
South Africa

Dear Thema,

We want to begin by thanking you and each of the representatives of Ga-Pila who contributed to the joint submission to IRMA on 15 December 2025, raising concerns related to the independent audit of the Mogalakwena mine (Ref: IRMA2025010). We take your feedback seriously and use it to inform our ongoing efforts to strengthen the system.

IRMA's Issues Resolution System is designed to understand the issues brought to IRMA's attention and to address them in an efficient, accountable, and fair manner. The joint submission on behalf of the Ga-Pila community raised important issues with IRMA's approach to stakeholder outreach; with the audit report itself; and with ongoing social and environmental performance concerns of the mining company including blasting, dust, and water pollution, as well as matters related to past resettlement. Given the breadth of the issues raised, we shared your submission with ERM CVS, the audit firm that conducted the independent third-party audit at Mogalakwena, and with Valterra Platinum, the current owner and operator of the mine. Per our Issues Resolution System, ERM CVS and Valterra Platinum will provide their own responses.

In what follows, we explain the steps the IRMA Secretariat will take in response to the important points you raised as they relate to IRMA's stakeholder outreach efforts, the IRMA Standard, and the policies and procedures governing the assurance process.

1. Awareness of IRMA only after the audit report was published

You are correct to raise this concern. IRMA's pre-audit outreach at Mogalakwena was insufficient.

We know that while IRMA is bringing unprecedented transparency to these mining operations, and independent verification of what's happening on these sites, most community members and workers don't know what IRMA is and are unclear whether there's value for them to participate. When feasible, IRMA works to support stakeholder engagement by auditors through early direct outreach to stakeholders.

Early engagement also allows IRMA to provide more effective support to auditors as they plan their on-site activities, including identifying barriers to participation that some stakeholders or rightsholders may face, and which may require modifications to the audit process itself. For example, in 2025 we were able to invest in early outreach in Indonesia, Bosnia, Argentina, Chile, Peru and Democratic Republic of Congo. We're seeking increased resources to do more of this outreach and seeking resources for networks of community-based groups, NGOs, and labor unions to do their own outreach prior to an audit in their area.

Additionally, we have already made several improvements to respond to the feedback you provided to us. We now develop an annual outreach strategy that outlines our approach to strengthening relationships with communities and ensures that resources are intentionally prioritized for engagement. This represents a shift towards being more present on the ground before and after audits. We are now actively implementing this approach through pre-audit outreach, where audits are taking place, and your feedback helps strengthen this work. As we continue to implement the strategy, we would like to take the opportunity later in the year to share the results of this work, including both progress made and challenges encountered, so that we can continue to improve and share progress.

We are committed to standardizing early community and worker outreach across all IRMA audits. We also want to be clear about why this matters beyond process quality: if audit results are not seen as credible by the communities and workers most directly affected, they provide diminished value to mines, investors, and purchasing companies alike.

2. **No community engagement on draft audit report findings**

You are correct that IRMA's current assurance system does not provide for community or worker review of draft findings prior to the publication of audit reports.

Our primary focus is on strengthening community and worker outreach before audits begin—to build trust, reduce barriers for key stakeholders and rightsholders, and ensure auditors hear directly from those best positioned to speak to site performance. Doing so helps ensure that audit findings are robust and credible.

In addition to early community and worker outreach, we are also exploring practical changes to increase transparency around what happens after a community member or worker participates in an audit interview.

We also recognize that we provide sites an opportunity to work on gaps identified in the audit before the report is published. This results in a delay of the published report, which has been a source of criticism from a variety of stakeholders including community members and customers. We are working to create more transparency during this phase so that interested parties can learn more about the focus areas for corrective action and ask the site for more information or to participate, as appropriate.

Your complaint (and the steps taken by the site to address the concerns) is information that auditors will consider in subsequent audits. At Mogalakwena, the surveillance audit is scheduled to occur this year. Auditors will be reaching out prior to the surveillance audit to arrange time to speak with interested parties, including yourselves.

3. Limitations in audit methodology

We have asked ERM CVS to provide a specific account of the method they used to address how they would approach stakeholders to participate in this audit. More broadly, we recognize an important asymmetry in IRMA's current methodology: while worker interviews follow a precise and structured approach based on the total number of workers at a site, community and stakeholder interviews do not yet benefit from an equivalent methodology or a consistent set of indicators. This is a known gap that we are actively working to address.

In the meantime, for audits in complex social or political contexts—such as Mogalakwena—we encourage audit teams to ensure they have access to local experts who can advise on local political dynamics and inform both decisions on how to identify a representative base of people for stakeholder outreach planning. We are committed to building this expectation more consistently into our audit planning requirements.

4. Limitations in how the audit addressed impacts related to past resettlement

We recognize that past resettlement and livelihood restoration represent one of the most significant concerns for the Ga-Pila community.

We want to take this opportunity to explain how resettlement activities are assessed in the IRMA system. Under the current framework, resettlement activities are assessed differently based on when resettlement activities were completed.

Resettlement activities that were completed between April 30, 2006, and June 2018 are assessed against a more limited number of IRMA requirements, a reflection of what was considered best practice at the time, and of the likelihood that information gaps exist for activities undertaken before 2006 (more than 20 years ago).

Resettlement activities completed after 2018 are assessed against the full chapter. For Mogalakwena, the earlier resettlement actions are addressed in their own version of chapter 2.4, referred to as 2.4A, and the more recent resettlement actions are addressed as 2.4B. Resettlement activities completed prior to June 30, 2006, are not assessed against IRMA's resettlement chapter.

However, it is important to note that the impacts of past resettlement are not without recourse in the IRMA framework: they remain relevant and reviewable under other chapters, specifically those addressing human rights due diligence (Chapter 1.3) and access to information and grievance mechanisms (Chapter 1.4).

In the Mogalakwena audit, the site was assessed in terms of past resettlement (what is referred to as Old Mothlotlo resettlement, which included the relocation of Ga-Pila); and in terms of current resettlement, involving a new phase of the Old Mothlotlo, as well as new resettlement activities at Skimming and Leruleng.

Ultimately, the audit found several important gaps or shortcomings in those activities (we refer you to pages 96 – 114). Auditors found that these resettlements were undertaken without dedicated subject-matter experts or well-defined policies, and that while a Resettlement Action Plan was initiated, it was not kept up to date or actively used to guide implementation. The initial planning process also failed to specifically assess impacts on women, addressing only vulnerable groups in broad terms.

The auditors also found that the Independent Resettlement Review 2019 (IRR, also referred to as 2018 Mogalakwena Resettlement Review Report)—a completion audit—was finalized in 2018 and identified gaps in outcomes, including the finding that compensation and livelihood restoration options provided to affected community members were not sufficient to equate to full replacement costs (p.127, 2.4.5.2). ERM CVS also found that the IRR report was not disclosed to affected stakeholders (p.112, 2.4.7.3.iv)—something we will ask Valterra to disclose to you.

A long-term remediation approach was started in 2019. This is ongoing. Auditors report that a remedial entitlement framework, covering medium- to long-term entitlements including water provision, sanitation infrastructure, and livelihood restoration, is under development (p.110). This could offer a pathway for you to raise outstanding issues.

5. Accessibility of the audit report format

We take seriously your concern about the accessibility of the audit report. IRMA has historically taken responsibility for coordinating the translation of audit reports and related materials, but we are in the process of transitioning this responsibility more directly to audit firms because the content of the report and the accuracy of the translation is ultimately their responsibility.

We have also piloted a new condensed audit summary format as part of the audit report, as well as individual Chapter summaries. We have received positive feedback from civil society groups about these changes. We will continue to implement improvements like a digital dashboard, which can allow stakeholders to easily navigate to key chapters and view, download, or share results easily. You can see what this looks like for the Eramet audit report released earlier this year. We will continue to build on these improvements, including developing more accessible report formats to support broader understanding of audit findings.

6. Next Steps: Responding to your complaint and improving IRMA systems to better serve local communities impacted by mining

Here are key actions IRMA is taking in response to the concerns you've raised:

- We have posted a summary of your complaint on IRMA's website, so if you would like to share with others a summary of concerns you have with this mine site, and how performance there has been described, you may provide others with a link to read your perspective on this site's performance.
- We have asked ERM CVS, the auditors who conducted this audit, to provide a written response to your concerns (which will be posted on IRMA's website)
- Auditors will integrate your concerns and feedback into their planning so that when they visit the site for the next audit review your perspectives inform their work, including how they engage with communities impacted by this site.
- We have asked Valterra to respond. We are encouraging the company to engage in further dialogue with you directly and before future IRMA audits, in hopes this communication between you will help to address these issues and improve the experience for people living near this site.

Conclusion

IRMA's accountability to mining-affected communities, workers, and civil society organizations is the foundation upon which the credibility of our Standard and assurance system rests, and the primary source of value that companies, investors, and purchasing companies derive from participating in the IRMA system. If the quality of our processes does not create genuine confidence for those most directly affected by mining operations, that value is diminished for everyone.

We hope this letter has addressed each of the concerns you raised and given you a fair sense of how we will work to improve our processes to better support your community to use IRMA audits as a source of information and a tool for being in direct contact with the mining company to identify improvements. If there are any issues we have not adequately responded to, please do not hesitate to follow up with us directly.

You also have the right to further escalate this matter within the IRMA Issues Resolution System to ask for further attention to these issues if you believe that is warranted. We are genuinely grateful for the time and effort your community invested in this submission. It is precisely this kind of engaged, critical feedback that allows IRMA to improve, and we hope you will see in our response a sincere commitment to making this process more accountable and meaningful for you.

Yours sincerely,

Aimee Boulanger

Executive Director