



IRMA Overview

Presentation by Aimee Boulanger Exec Director, IRMA,
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Corporate Social Responsibility ([CSR Institute](#)), Toronto, Canada
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IRMA Initiative for Responsible
Mining Assurance

What is the Initiative for Responsible Mining Assurance?

A voluntary certification system for large-scale mines



1. The IRMA Standard for Responsible Mining

- **Best practice** requirements on 26 topics – a comprehensive and rigorous mining standard
- Standard was developed through a robust **multi-stakeholder** process

2. A third-party, independent assurance system

- Auditors external to the mining company evaluate whether a mine is meeting the IRMA requirements
- The **audits include site visits** and **input from rights holders**, mine workers and stakeholders

IRMA is led by a multi-sector Board, using an equitable governance model (i.e., each sector has the same voting rights).

Mining Companies	Purchasing Companies	NGOs	Organized Labor	Affected Communities	Investors and Finance*
Anglo American	Tiffany & Co	Earthworks	United Steelworkers	First Nations Advocating Responsible Mining (Canada)	*This constituency was added in 2020 and board members are currently being considered.
ArcelorMittal	Microsoft	Human Rights Watch	IndustriALL Global Union	Mining Affected Communities United in Action (South Africa)	

The IRMA Standard

Comprehensive coverage of mining issues

Business Integrity

- Legal compliance
- Stakeholder engagement
- Stakeholder grievance mechanism
- Human rights due diligence
- Revenue transparency/anti-corruption

Planning for Positive Legacies

- Environmental and social impact assessment and management
- Free, Prior and Informed Consent
- Community support and benefits
- Resettlement
- Emergency preparedness and response
- Planning and financing reclamation and closure

Social Responsibility

- Labor rights
- Worker health & safety
- Community health and safety
- Conflict affected areas
- Security arrangements
- Cultural heritage protection
- Artisanal and small-scale mining (ASM)

Environmental Responsibility

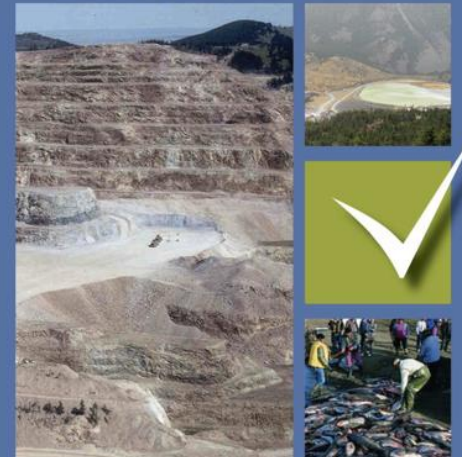
- Water management
- Waste (tailings) management
- Air quality
- Greenhouse gases emissions
- Noise management
- Biodiversity, ecosystem services, protected areas
- Cyanide management
- Mercury management



IRMA
Initiative for Responsible
Mining Assurance

IRMA Standard for
Responsible Mining
IRMA-STD-001

June 2018



The IRMA Standard

Integrates existing best practice expectations and goes beyond where agreed through multi-stakeholder process

- Human Rights Due Diligence, Stakeholder Grievance Mechanism (UN Guiding Principles on Business and Human Rights)
- Mining in Conflict-Affected Areas (OECD Due Diligence Guidance on Mineral Supply Chains)
- Resettlement, Cultural Heritage (IFC Performance Standards)
- Revenue and Payments Transparency (EITI)
- Security (Voluntary Principles on Security and Human Rights)
- Labor Rights and Worker Health and Safety (ILO conventions)
- Tailings Management (Mining Association of Canada protocol)
- Biodiversity Management (IFC, ICMM, IUCN and others)
- Cyanide Management (International Cyanide Code)

IRMA

System

Fundamentals

1

Certification scheme for industrial-scale mines

Mines anywhere on the planet can participate

2

Applies to all mined materials

Except energy fuels such as uranium, thermal coal, oil sands, oil and gas

3

Assessment is at the mine site level

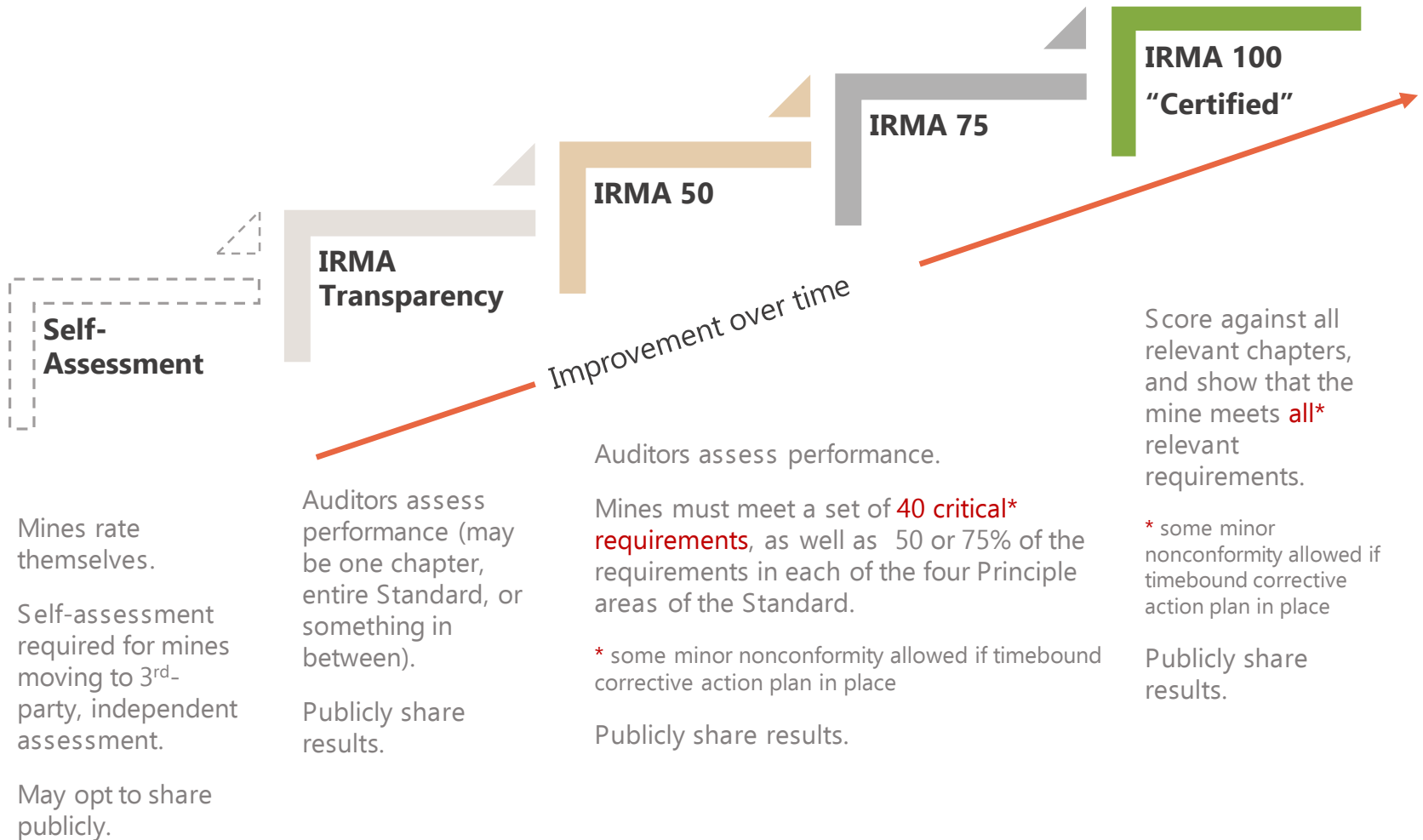
Companies aren't certified, but can put all of their mines into the system if they choose

4

Certification is at the best practice level

But mines at any performance level can participate, and show continuing improvement over time

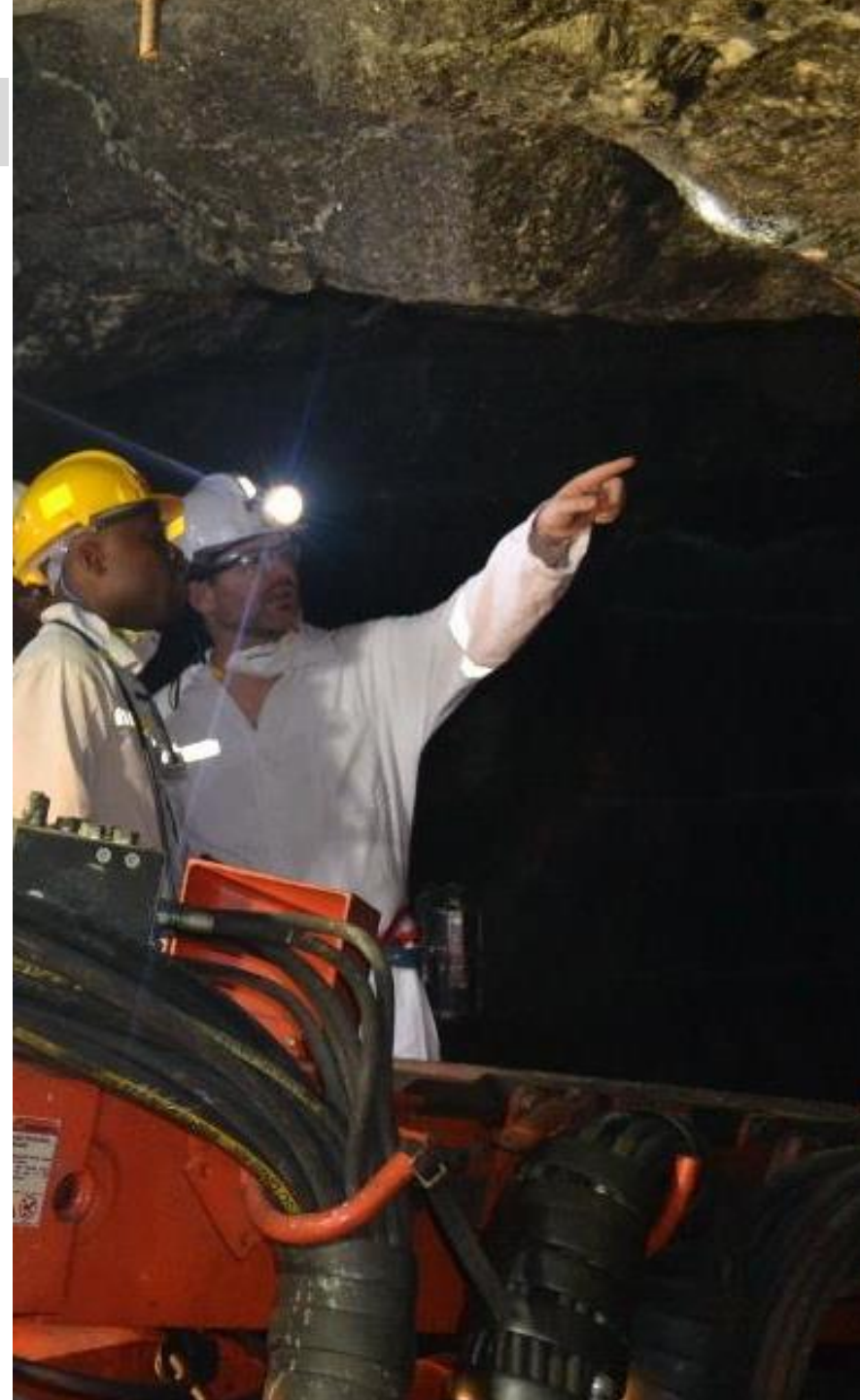
IRMA Achievement Levels



--Must undergo independent, 3rd-party audit to reach an achievement level--

Independent 3rd-Party Audits

- Necessary if mines want to be certified or make claims about other IRMA achievement levels
- 2-stage audit: desk review and on-site visit
- Audits include input from workers, communities, other stakeholders
- Summary of results made public
- 3-year audit cycle with surveillance audit in between
- Mines and stakeholders have access to a complaints mechanism
- Mines are encouraged to provide feedback to IRMA to improve the system and Standard



Not all voluntary systems are equal

How is the system governed?

Boards or other governing bodies decide what is in the Standard, and how performance is assessed.

Some systems are primarily overseen by the industries that are being evaluated.

IRMA is governed by five sectors:

- Mining
- Purchasers of mined materials
- Organized labour
- NGOs
- Affected Communities

Each “house” in IRMA has equal voting power

What does the Standard say?

Words matter, because what is written in the Standard is what will be evaluated by auditors.

Expectations in many standards are very general, so there is no way to differentiate leaders from laggards.

IRMA has detailed best practice requirements so that all stakeholders are aware of exactly what is being evaluated, and mines that fully meet the requirements will deliver similar positive outcomes

What is the auditing process?

Some systems do not require on-site visits, and do not provide ways for stakeholders or affected rights holders to participate.

IRMA audits include a on-site visit, and interviews with rights holders, members of affected communities and workers.

Are audit results disclosed?

The level of transparency varies widely from one system to the next.

Some systems only tell you whether or not a company or site met the standard.

IRMA produces a public report with information on how a mine site performed on all 400+ requirements.

Companies, NGOs, and governments
are using IRMA

Voluntary initiatives cannot
replace/compete with importance of
government

IRMA provides added market support
for government to protect environmental
and social values alongside economic
value

"IRMA presently offers a well-developed option for certification of lithium mining operations, offering the most credible assurance of "best-in-class" materials. Implementing mine site certification will also mean companies are prepared for the full supply chain and/or product certification, which is a direction the broader market appears to be moving."

Australian government, University of Technology Sydney Report
September 2020

IRMA can be a resource to inform changes to regulations

1

Provide a template for
stronger laws

35 NGOs in British
Columbia call for mines
to meet or exceed
requirements in the
IRMA Standard (May
2019)



30. RECOMMENDATION: Require that all mines in BC comply with the IRMA standards, or better, for Waste and Materials Management.

38. RECOMMENDATION: Adopt the IRMA Standard for Responsible Mining water management standards as minimum requirements in BC's laws, including full consultation with communities on critical water-related issues.

33. RECOMMENDATION: Enact measurable and enforceable reclamation criteria that meet or exceed the international standards set in IRMA's Standard for Responsible Mining.

39. RECOMMENDATION: Prohibit mines that are not meeting water treatment unless the mine meets the exceptional circumstances set out in the IRMA Standard for Responsible Mining.

IRMA can be a resource to inform changes to regulations

2

Provide a benchmark to
identify regulatory gaps



Executive Summary and Key Recommendations

Canada is an important international mining jurisdiction with a notable mineral base. Its ability to attract investment in the future will depend on how its mining laws measure up to international best practices. These standards for performance in the mining sector are evolving rapidly in order to address growing demands for responsibly sourced metals and minerals.

Leading metals producers, buyers, financiers and civil society organizations are now working together to establish thresholds for best practices through the development of a detailed certification standard to evaluate and identify responsible mining projects.

To gauge where Canada stands relative to these emerging responsible mining markets, and to identify areas for improvement, this legal review examines selected components of mining regimes in five Canadian jurisdictions: British Columbia (BC), Ontario, Quebec, Yukon and the Northwest Territories (NWT).



Purchasers are asking for IRMA



MINERALS DERIVED FROM RESPONSIBLE MINING.

The BMW Group is the first automobile company worldwide to become a member of the Initiative for Responsible Mining Assurance (IRMA). The aim is to systematically promote the sustainability of mined materials and adherence to the highest supply chain standards.

Over the past few months, the BMW Group has achieved key milestones in its efforts to ensure high standards of sustainability worldwide in as many industrial sectors as possible (see article in our last newsletter). To ensure high social and environmental standards are maintained, not only within the company by its 130,000+ employees, but also within its supply chains, the BMW Group has now become a member of the Initiative for Responsible Mining Assurance (IRMA). The aim is that in future suppliers and subcontractors will use only IRMA-certified minerals such as platinum, copper, lithium, graphite or nickel.

“Where mining is necessary, it must be compliant with high-bar environmental and human rights standards such as the Initiative for Responsible Mining Assurance (IRMA)..”

Sierra Club's Mining Policy (first in 130 year history)

March 2020



World Wildlife Fund

*“Changes are needed:
...Certify best practices
through initiatives such as
the **Initiative for
Responsible Mining
Assurance (IRMA)**.”*

*“Companies need to:
...Implement credible
certification schemes, e.g.
IRMA.”*



**BOOM IN RAW MATERIALS:
BETWEEN PROFITS AND LOSSES**

Germany's Ecological Footprint of Steel and Aluminium

Self-Assessment Tool

- step-by-step introduction to the Standard
- share scoring or keep it confidential
- preparation for the third-party audit



Self-Assessment Tool (Prep for Third-Party Audit)

- provides notes on each requirement

MINE MEASURE
responsible mining self-assessment

This chapter has not been completed [Skip this chapter](#)

[View Self-Assessment Summary](#)

1.2 Community and Stakeholder Engagement

This chapter has 1 critical requirement

1.2.1. Planning and Designing Stakeholder Engagement Processes

1.2.1.1.

The [opening comments](#) shall contain an identification and analysis of the range of groups and individuals, including community members, [stakeholders](#) and others (translating 'related to collectively as "stakeholders"') who may be affected by or interested in the company's [mining-related activities](#).

Notes on this requirement

Partly Meets

This planning process identifies and analyses stakeholders who may be affected by or interested in the company's mining-related activities.

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Substantially Meets

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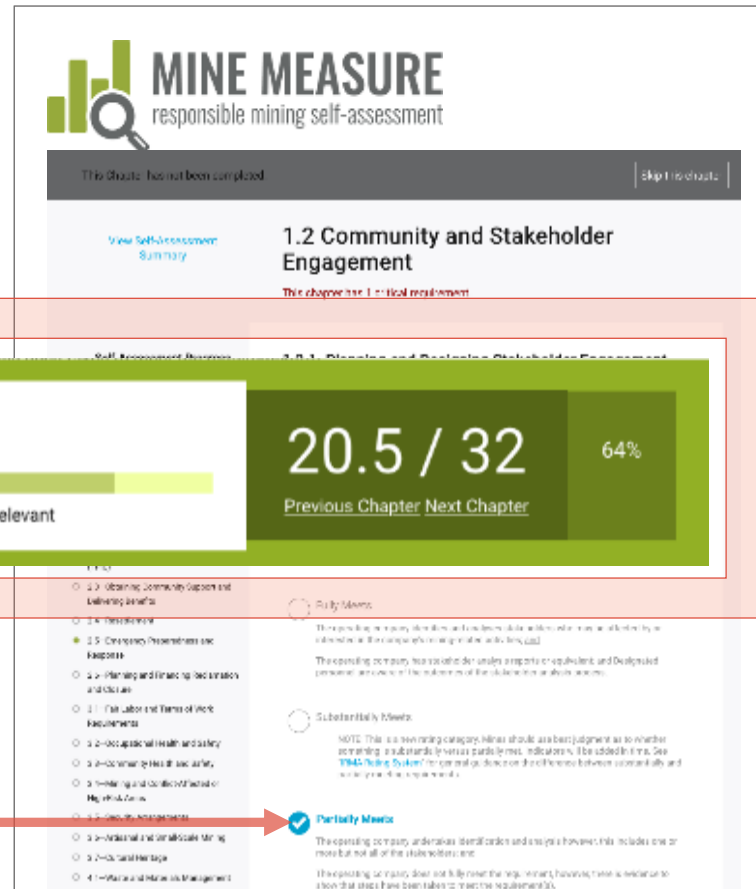
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Self-Assessment Tool (Prep for Third-Party Audit)

- allows a mine to self-rate performance



IRMA's First Audit Report was just released




It not only discloses scores for every chapter and Principle in the IRMA Standard. . .

3.2. Scores by IRMA Standard Principle and Chapter

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 1: Business Integrity		43	104	40.6%
Chapter 1.1—Legal Compliance	Yes	3	12	25%
Chapter 1.2—Community and Stakeholder Engagement	Yes	18	26	69%
Chapter 1.3—Human Rights Due Diligence	Yes	8.5	22	39%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	11.5	22	52%
Chapter 1.5—Revenue and Payments Transparency	Yes	2	24	8%

IRMA's First Audit Report was just released

It also provides detailed information on how the mine performed on each of the relevant requirements.

Chapter 1.3—Human Rights Due Diligence	Basis for rating
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	 <p>Carrizal adopted a Human Rights Policy that was provided showing Carrizal commitment with respecting internationally recognized human rights international standards. Grievance mechanism is mentioned in the policy.</p>
1.3.1.2. The policy shall: <ul style="list-style-type: none"> a. Be approved at the most senior level of the company; b. Be informed by relevant internal and/or external expertise; c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project; d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders; e. Be reflected in the mining project's operational policies and procedures. 	 <p>The policy is approved at the most senior level of the company and it was communicated by Carrizal to a sample of communities and workers (including a sample of contractors). The policy stipulates the operating company's human rights expectations of workers, contractors and communities linked to Carrizal. The policy is not yet publicly available. The policy is not being totally reflected and integrated in the mining operations.</p>
1.3.2.1. Critical The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter	 <p>The first stand-alone assessment was recently completed including workers (including mine contractors), however it doesn't</p>

How to use IRMA as a tool

To increase value for more responsible mining

The first mines are now being assessed and releasing public audit reports: offering opportunity for increased transparency and accountability

- Purchasers and investors are asking mines to undergo an IRMA audit
- IRMA brings into one system comprehensive measure; doesn't trade key issues off one another when many are relevant in climate-stressed world
- IRMA has accountability and credibility with civil society
- IRMA has draft policies for exploration/development phase, smelting/refining, Chain of Custody to track materials from IRMA-achieving mines
- IRMA has agreements with downstream standards, e.g. ResponsibleSteel

IRMA seeks to continue to improve its Standard and system over time

- We welcome your input help to inform changes to our Standard and system through participation in working groups and review of our draft policies



Thank you

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responsiblemining.net

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