

## Submission on the Responsible Mining Index (RMI) Draft Methodology

### 1. Introduction

On 9 February 2017 the Responsible Mining Foundation released its draft methodology for the Responsible Mining Index (RMI) for public comment and recommendations from all stakeholder groups. The International Council on Mining and Metals (ICMM) welcomes the opportunity to provide feedback.

ICMM is an organisation of 23 leading mining and metals companies and 34 associations that collaborate to promote responsible mining, with a shared commitment to respect people and the environment. ICMM works in partnership with others to catalyse change for a safe, fair and sustainable mining industry. Through collaboration we seek to lead in strengthening the environmental, social and economic performance of the industry, while also championing the responsible production of the materials that enhance people’s lives. With our members we minimise the impacts of mining and maximise its benefits - enhancing mining’s contribution to society. Further information on our organisation is available at [www.icmm.com](http://www.icmm.com).

The specific goal of the RMI is to encourage continuous improvement in responsible mining by transparently ranking the performance of some of the world’s largest mining companies on economic, environmental, social and governance issues, and highlighting leading practice. The plan is to publish the Index every two years and to rank 30 of the world’s largest mining companies. Their relative performance will be scored largely at corporate level, although a limited number of indicators will focus on the performance of approximately 150 mining operations. In providing feedback therefore, ICMM has considered the degree to which we consider the indicators to be **fit for purpose at either a corporate or an operational level**.

### 2. Assessing whether indicators are fit for purpose

To support an assessment of whether indicators are fit for purpose, ICMM has considered each indicator against the following four criteria:

Criteria	Description
1. Responsibility of the company	Does the indicator connect to something that is primarily the responsibility of companies?
2. Specific and unambiguous	Is the indicator expressed in precise terms that make it clear what is being measured?
3. Measurable performance	Can the indicator be measured using readily available data in a way that connects to performance?
4. Comparable across companies	Does the indicator enable comparisons to be made between companies on an equitable basis?

For each criterion for each of the 75 draft indicators, ICMM has used the following four-point rating system.

Rating	Description	Colour code
1	Not at all	
2	Slightly	
3	Moderately	
4	Very	

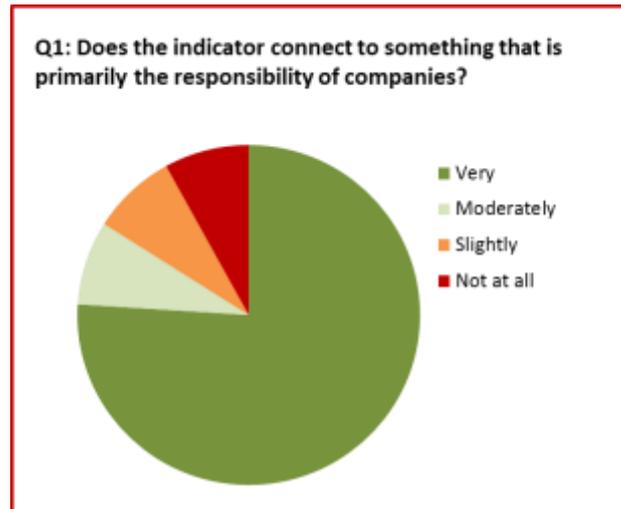
The results and conclusions are summarised below.

### 3. Results of ICMM's assessment

In the interest of transparency, our detailed assessment is included as Appendix 1. A summary of the results is provided below, where each of the assessment criteria is framed as question. For an indicator to be fit for purpose, it ought to be very or at least moderately aligned with all four criteria. So while each criterion is considered individually below, the overall result is critically important.

#### **Q1. Does the indicator connect to something that is primarily the responsibility of companies?**

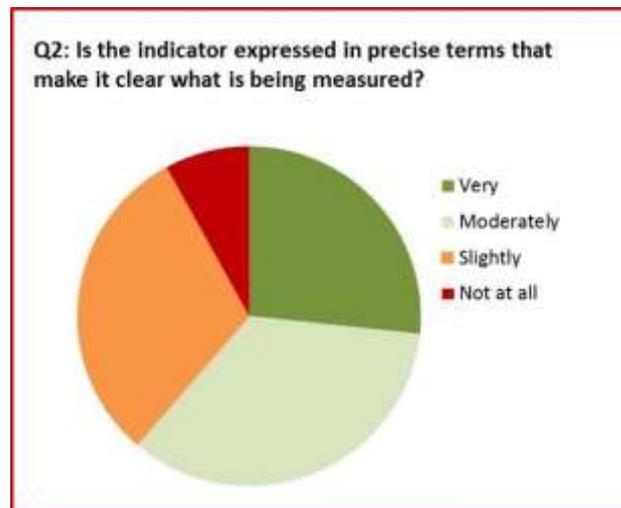
For the most part, the indicators in the draft RMI relate to issues/aspects that are the responsibility of companies. This is a baseline expectation. Overall, 76% of the indicators strongly connect to mining companies and a further 8% are moderately connected.



Just over 15% of indicators are therefore either slightly (or not at all) connected to issues or aspects that companies are primarily responsible for. For example, indicators such as A.3.2 (capacity building on socio-economic research at multiple levels) and D.8.1 (establishing formal agreements with ASM) go far beyond what is reasonable to expect of, or appropriate for, mining companies. The Responsible Mining Foundation is encouraged to reconsider whether it should have indicators on such issues/aspects.

#### **Q2. Is the indicator expressed in precise terms that make it clear what is being measured?**

The extent to which indicators are expressed precisely varies markedly. Just over a quarter (27%) has been assessed as very precise, with a higher percentage rated as moderately precise (35%).

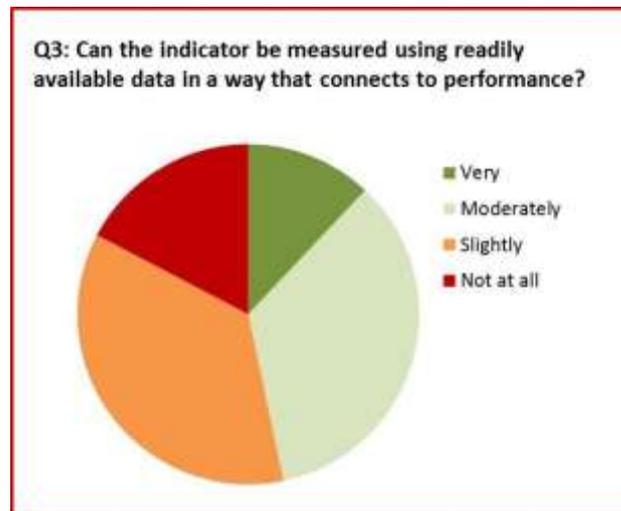


However, a slightly smaller number of indicators are only slightly precise (31%) and 8% were rated as wholly imprecise. The Responsible Mining Foundation is encouraged to carefully review all those indicators

rated as less than very precise to see how greater clarity can be provided on what is being measured. This is also closely connected to the third criterion, which concerns measurability and connection to performance.

**Q3. Can the indicator be measured using readily available data in a way that connects to performance?**

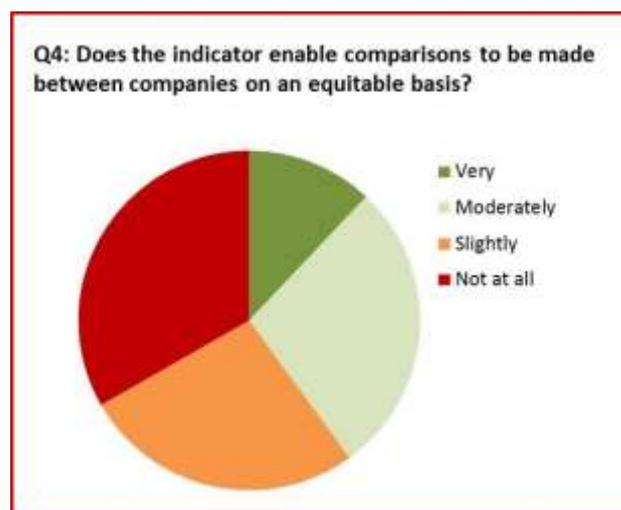
Given that RMI is intended to encourage continuous improvement in responsible mining performance, availability of data and connectivity to performance is important. Here the results are more mixed. Only 12% of the indicators were assessed to be very aligned with this criterion, with a further 35% moderately aligned. More than half of the indicators were either only slightly or not at all aligned.



This issue of data availability and connection to performance is essential for an index that aspires to promote performance improvement. The Responsible Mining Foundation is encouraged to carefully review all those indicators that rated in the bottom two categories.

**Q4. Does the indicator enable comparisons to be made between companies on an equitable basis?**

Comparability lies at the core of any index and underpins its integrity. This is therefore arguably the most important of the four criteria – and the one where the RMI is weakest. Only 12% of the indicators enable comparisons to be readily made, although a further 28% were rated as moderately comparable.



However, 33% were rated as not at all comparable and a further 27% were only slightly comparable. Given the centrality of getting this right to the integrity of any index, the Responsible Mining Foundation is urged to revisit all those indicators that rated in the bottom two categories.

#### **4. Additional observations**

The draft methodology poses and answers the question of why a new initiative on responsible mining is needed (see page 9). The response indicates that in developing the RMI, the topics and indicators covered were mapped to those addressed in a wide range of related initiatives, “to ensure that RMI provides both complementarity and added-value to the ongoing global effort to make mining more responsible”. However, the supporting narrative falls short of a compelling articulation of the value-add of RMI beyond existing initiatives. It is also silent on what the external/stakeholder drivers/demands for the RMI are.

Whilst the reference sources for indicators are provided in the methodology, the rationale for their inclusion as part of an assessment framework to promote continuous improvement in responsible mining is not always clear. Indicators should be designed to meet clear objectives and be realistically measurable in a way that connects to performance (see Q3 above). Additional work is required both to explain the rationale for including indicators and to reframe them in order to address the concerns outlined in section 3 above.

As mentioned in section 3, the issue of comparability lies at the core of any index and underpins its integrity. If the Responsible Mining Foundation treats the responses to indicators as binary data (yes or no answers), then comparability across companies is simple. However, the qualitative dimension of what companies are doing is of critical importance for most indicators, as are the outcomes. In addition, a binary yes/no response is more likely to encourage a box-ticking mentality rather than encouraging continuous improvement in responsible mining (which is the stated goal of the RMI).

The benefit for companies participating in or promoting the RMI will ultimately depend on its success, which in turn depends on its legitimacy and uptake. For companies that will be profiled in the RMI, a key consideration is the integrity of the data collection process and the ease of engaging in checking the factual accuracy of any information collected. This requires a disciplined, thorough and objective approach to data collection. Otherwise it will be difficult to expect companies to engage in the process of validating the factual accuracy of information gleaned from secondary sources. The experience of many companies with other initiatives based on this model is that the validation process can be time-consuming and frustrating where the secondary research has not been thorough. It is also unclear in step 6 what would happen if a company disagrees with the results presented.

Throughout the RMI methodology (especially in section 9), reference is made to a range of related initiatives (principles, standards, guidelines, etc.). Many of these related initiatives are widely acknowledged as representative of best practice approaches for the mining and metals industry. In some instances, the RMI methodology could more faithfully align to (and acknowledge equivalency to) the related initiatives. In other instances, this may be difficult as they were not originally designed to enable relative performance across companies to be compared. Where appropriate however, we would urge RMI to demonstrate greater alignment with those initiatives already established.

#### **5. Conclusion**

As mentioned earlier, for an indicator to be fit for purpose, it ought to be very or at least moderately aligned with all four criteria. So while the results above are presented in a disaggregated manner, the overall result is critically important. Only 22 of the 75 indicators are either very or moderately aligned to the four criteria we developed for assessment purposes. And only 8 of these had three or four criteria assessed as very aligned. This suggests that far more development work is required if the index is to be fit for purpose.

ICMM approached this work with an open mind using an assessment framework we believe to have integrity. Our feedback is offered in the spirit of constructive criticism. The RMI may feel that our assessment has been too harsh, on the basis that the initiatives it has drawn upon include GRI, IFC performance standards, ISO 26000, the OECD Guidelines for Multi-national Enterprises, the UN Sustainable Development Goals, etc. However, there is a difference between drawing upon authoritative sources of standards, aspirations and principles and converting these into metrics that are readily comparable across mining companies. That is the challenge that the Responsible Mining Foundation has set itself.

## Appendix 1. Assessment of all Indicators against four criteria

Criteria	Description
1. Responsibility of the company	Does the indicator connect to something that is primarily the responsibility of companies?
2. Specific and unambiguous	Is the indicator expressed in precise terms that make it clear what is being measured?
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For each criterion for each of the 75 draft indicators, ICMM has used the following four-point rating system.

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4	Very	

List of indicators from the Responsible mining Index		1. Responsibility of company	2. Specific and unambiguous	3. Measurable performance	4. Comparable across companies	Comments
<b>A. Economic Development</b>						
<b>A.1 Subnational, National and Regional Socio-Economic Development Planning</b>						
<b>A.1.1</b>	The company considers how its mining-related investments and business decisions (including those related to infrastructure, accommodation and influx management) contribute to subnational, national and regional socio-economic development, and aligns these with government planning processes.					Not a good indicator due to lack of specificity, comparability and difficulty in connecting it to performance. The nesting of 3 levels here and in several other indicators assumes a level of influence/impact that many mining projects can/should not have.
<b>A.2 Procurement</b>						
<b>A.2.1</b>	The company has measures in place to ensure equitable access to procurement opportunities, at subnational, national and regional levels.					Some ambiguity about whether opportunities should be equal at all levels or differentiated. Important to acknowledge conflicts with trade restrictions in the description section.
<b>A.3 Institutional Capacity Building</b>						
<b>A.3.1</b>	The company supports institutional capacity building, at subnational, national and regional levels.					Not a good indicator due to lack of specificity, comparability and questionable connection to company responsibilities.
<b>A.3.2</b>	The company supports capacity building on socio-economic research and development at subnational, national and regional levels.					Weak indicator across the board and conceptually flawed. For example, why should capacity for research be built at 3 levels?
<b>A.4 Enhancing the Skills Base</b>						
<b>A.4.1</b>	The company has systems in place to support skills development and skills transfer, especially at technical, and mid and upper management level, in producing countries.					Some ambiguity around the meaning of skills transfer (which may not be appropriate in all instances).
<b>B. Business Conduct</b>						
<b>B.1 Business Ethics</b>						
<b>B.1.1</b>	The company promotes cross-departmental adherence to business ethics.					Business ethics is a broad area, so this indicator would benefit from greater clarity.
<b>B.1.2</b>	The company has a whistle-blowing mechanism in place for reporting concerns about unethical behaviour.					Indicator is specific and relates to the responsibility of the company.
<b>B.2 Board Level and Senior Management Accountability</b>						
<b>B.2.1</b>	The company holds individual board directors and senior managers accountable for responsible business conduct and environmental and social performance.					Generally clear but only moderately comparable as different companies will have different ways of holding staff to account.
<b>B.2.2</b>	The company demonstrates respect for diversity and inclusivity by including a range of gender, expertise and stakeholder interests on its board and in its senior management.					The phrase "range of... stakeholder interests" is ambiguous, and not easy to measure or compare across companies.
<b>B.3 Contracts Disclosure</b>						
<b>B.3.1</b>	The company publicly discloses all contracts, licences and agreements that grant it access to the extraction of mineral resources and associated projects.					The publication of contracts and licenses requires the approval of the government in question. If some governments allow it and other don't, it's unfair to compare across companies.
<b>B.4 Beneficial Ownership</b>						
<b>B.4.1</b>	The company publicly discloses the beneficial ownership of each entity within the company that bids for, operates or invests in extracting mineral resources.					Overall a good indicator.
<b>B.5 Tax Transparency</b>						
<b>B.5.1</b>	The company practices tax transparency in all its tax jurisdictions.					"Tax transparency" means different things to different people and may vary across geographies, therefore more specificity is needed.
<b>B.5.2</b>	The company publicly discloses all tax benefits and tax holidays it receives from local and national governments.					Usually confidential information so difficult to confirm the veracity of anything that the company disclosed.
<b>B.6 Payments to Producing Countries</b>						
<b>B.6.1</b>	The company publicly discloses all the payments that it makes to subnational and national governments, providing disaggregated data on a project-level basis.					Overall a good indicator.
<b>B.7 Lobbying Practices and Political Contribution</b>						
<b>B.7.1</b>	The company publicly discloses its lobbying practices and positions.					The expectation of what companies should disclose is ambiguous and hard to compare across companies.
<b>B.7.2</b>	The company publicly discloses its direct and indirect political contributions.					The expectation of disclosure on 'indirect political contributions' is ambiguous and hard to compare across companies.
<b>B.8 Bribery and Corruption</b>						
<b>B.8.1</b>	The company demonstrates commitment to prevent all direct and indirect forms of bribery and corruption, and it has systems in place to achieve this objective.					Generally a good indicator but moderately difficult to measure and to compare across companies.

List of indicators from the Responsible mining Index		1. Responsibility of company	2. Specific and unambiguous	3. Measurable performance	4. Comparable across companies	Comments
<b>B.9 Responsible Contracting and Sourcing</b>						
<b>B.9.1</b>	The company incorporates requirements for responsible environmental, social, human rights and governance practices into formal agreements with contractors, subcontractors, suppliers and business partners, and has systems in place to ensure adherence.					The lack of definition around requirements means there is a lot of scope for variation in interpretation and little chance of meaningful comparison other than at the yes/no level.
<b>C. Lifecycle Management</b>						
<b>C.1 Mine Lifecycle Management</b>						
<b>C.1.1</b>	The company commits to adopt a lifecycle approach that integrates mine closure throughout project development and operations.					The commitment is ambiguous and there are no measures of performance to compare companies– other than the binary measure of policy is in place/not in place.
<b>C.1.2</b>	The company provides financial surety for mine closure and post-closure liabilities. It publicly discloses corresponding arrangements, ensuring that these arrangements are perpetually accessible to communities.					The use of the term ‘perpetual’ accessibility is problematic as closure plans are regularly reviewed and updated. Comparability between sites / companies is difficult.
<b>C.2 Project Approval Process</b>						
<b>C.2.1</b>	The company integrates economic, environmental, social and governance factors into the stage-gating process at investment committee level.					Overall clear indicator, but difficult to compare across companies.
<b>C.3 Post-Closure Community Viability</b>						
<b>C.3.1</b>	The company plans for land rehabilitation and post-mining land-use opportunities.					Ambiguous and unclear what would be measured, making it impossible to compare across companies.
<b>C.3.2</b>	The company designs and plans operations to ensure the transition and continued viability of livelihoods and company-funded shared infrastructure, both around the mine and in labour sending areas, where applicable.					Ambiguous and unclear what would be measured, making it impossible to compare across companies.
<b>C.4 Mergers, Acquisition and Disposal Due Diligence</b>						
<b>C.4.1</b>	The company performs due diligence on mergers, acquisitions and disposals, evaluating both historical and future development, to ensure environmentally and socially responsible conduct.					Ambiguous as worded (e.g. historical and future development, responsible conduct), making it unclear what would be measured and impossible to compare across companies.
<b>D. Community Wellbeing</b>						
<b>D.1 Community and Stakeholder Engagement</b>						
<b>D.1.1</b>	The company has management systems in place to facilitate ongoing and inclusive stakeholder engagement activities and to enable participation of affected communities and rights holders, including women and youth.					The distinction between ‘affected communities’ and ‘rights holders’ is not clear. This indicator focuses on the existence of management systems, not the quality of those systems.
<b>MS 1</b>	The operating company actively and inclusively engages affected communities in regular assessments of its impacts and in sharing the results, throughout the life of the mine.					The wording is vague and imprecise, e.g. what is meant by ‘active’, ‘inclusive’ and ‘regular’ and how will this be measured? The narrow focus on impacts is ill-judged.
<b>D.2 Economic and Social Viability</b>						
<b>D.2.1</b>	The company conducts regular and ongoing social impact assessments to identify baseline conditions and changes, assess positive and negative impacts and identify measures to manage these impacts.					Social Impact Assessments are neither regular nor-ongoing. There is some confusion between impact assessments, monitoring and impact mitigation.
<b>D.2.2</b>	The company has measures in place to support local business development, and encourages entrepreneurship, particularly for women and youth.					These ‘measures’ could have many forms, not all would be effective, and it is difficult to compare measures between companies.
<b>D.2.3</b>	The company facilitates the participation of women and youth in the design, implementation, monitoring, evaluation, and reporting of measures to manage social impacts, including community development projects.					The approach to facilitating participation could take many forms, not all would be effective, and it is difficult to compare measures between companies.
<b>D.2.4</b>	The company publicly discloses its local development agreements and benefit sharing agreements.					Disclosure is binary (yes or no) and is easy to measure. However, development agreements are not always in place. Where they are, the community often opposes disclosure.
<b>MS 2</b>	The operating company has measures in place to support local employment opportunities, particularly for women and youth.					These ‘measures’ could have many forms, not all would be effective, and it is difficult to compare measures between companies.
<b>D.3 Community Health</b>						
<b>D.3.1</b>	The company has systems in place to implement and document integrated community health and safety assessments and management plans.					The indicator is ambiguous, it is unclear what is being measured (systems, implementation, documentation) and difficult to compare between companies.

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<b>D.3.2</b>	The company develops and implements policies, business practices and targeted initiatives to mitigate the impact of high-burden diseases such as HIV, Tuberculosis, Malaria and others that are applicable in the context of its operations.					The indicator is ambiguous as it is unclear whether the focus is on employees or the wider community. It also starts from the premise that this is the responsibility of the company.
<b>D.4 Gender Equity</b>						
<b>D.4.1</b>	The company acts on the results of regular assessments of the impacts of its activities on women.					Taking action is very broad; what types of action? Remediation, mitigation? Won't compare well across companies if company A has no negative impact and therefore takes no action, but company B has negative impact and takes action
<b>D.5 Indigenous Peoples</b>						
<b>D.5.1</b>	The company identifies all indigenous peoples' groups located near current and potential mines and associated facilities, including those in potential areas to be affected by the mining operation (e.g. mine tailings dams). It identifies their particular rights, interests and needs through inclusive meaningful participation.					The indicator includes a number of elements so it is not that specific. The quality of inclusive meaningful participation is harder to measure and compare across companies than the other elements.
<b>D.5.2</b>	The company implements a plan to address the particular rights, interests and needs of indigenous peoples' groups through inclusive meaningful participation.					This is an important area where companies have much to offer, but the indicator is flawed in implying overall responsibility for rights realisation and development on companies. It should focus on situations where rights may be impacted due to mining.
<b>D.6 Free, Prior and Informed Consent</b>						
<b>D.6.1</b>	The company supports the principle of free prior and informed consent (FPIC) through its policies and implementation guidelines.					Overall a good indicator.
<b>D.7 Land Rights, Resettlement and Remedy</b>						
<b>D.7.1</b>	The company has management systems in place, including assessment and planning, for avoiding, minimising and addressing the impacts of the physical and/or economic displacement of project-affected people.					The existence of management systems can easily be measured and compared. It is unclear why there is a specific emphasis on 'assessment and planning'.
<b>D.7.2</b>	The company engages project-affected people, including women and youth, in land rights and resettlement decision-making and implementation, and evaluates the extent to which livelihoods, livelihood security and living standards have been improved or restored.					Engagement and evaluation are quite distinct and should not be combined in an indicator. For both aspects measurement and comparison across companies is complex.
<b>D.8 Artisanal and Small-Scale Mining</b>						
<b>D.8.1</b>	Where applicable, the company establishes formal engagement agreements with artisanal and small-scale mining (ASM) communities and operations in and around mines to regulate the relationship between itself and ASM.					The indicator is weak. 'Engagement agreements' is an ambiguous term. In some situations, ASM activities are illegal and formal agreements would be impossible. In others, ASM is distinct from rather than connected to a host community.
<b>D.8.2</b>	Where applicable, the company assesses and enables technical assistance programmes and/or alternate livelihood opportunities for ASM miners to encourage economic viability.					While the indicator is fairly specific, it wrongly attributes the responsibility for ASM to large scale mining companies.
<b>D.9 Human Rights</b>						
<b>D.9.1</b>	The company seeks to enhance community wellbeing and to respect human rights, for example through alignment with the UN Guiding Principles on Business and Human Rights.					The indicator is imprecise: the emphasis on enhancing 'community wellbeing' alongside human rights is mistaken. The focus on UNGPs as only a possible example is odd, unless the intent behind the UNGPs is captured in the indicator.
<b>D.9.2</b>	The company publicly reports on human rights management and performance, in line with the UN Guiding Principles on Business and Human Rights.					The indicator could be clearer and more specific about what is required.
<b>D.9.3</b>	The company records and publicly reports, including to appropriate producing country government authorities, any credible incidents of human rights violations and any identified risks for human rights defenders in its areas of operation.					The indicator is imprecise and covers too many aspects, e.g. a company may record but not report incidents. What does 'credible incident' mean and how is it measured? What definition of HRD is being used and how wide is area of operation? What data is being relied on to identify risks and how measured? Also questionable how far the HRD point is the responsibility of companies.
<b>D.10 Security</b>						
<b>D.10.1</b>	The company takes measures to minimise the risk of human rights abuses linked to its security management, in line with the Voluntary Principles on Security and Human Rights.					A good indicator but moderately difficult to measure and compare across companies
<b>D.10.2</b>	When operating in conflict-affected and high-risk areas, the company has specific systems in place for managing security risks for workers and communities.					A good indicator but moderately difficult to measure and compare across companies.

List of indicators from the Responsible mining Index		1. Responsibility of company	2. Specific and unambiguous	3. Measurable performance	4. Comparable across companies	Comments
<b>D.11 Grievance and Remedy</b>						
D.11.1	The company has formal community grievance mechanisms in place for affected stakeholders to raise concerns in an easily accessible manner and have them addressed.					A good indicator but moderately difficult to measure and compare across companies.
D.11.2	The company monitors and publicly reports on the effectiveness of the operational-level grievance and remedy mechanisms.					The indicator would need to define effectiveness to be clear. This would support measurement and comparisons across companies.
MS 3	The operating company can demonstrate implementation of a grievance mechanism and claimants' effective access to remedy.					The indicator is imprecise as effective access to remedy is not defined, making measurement and comparisons difficult.
<b>E. Working Conditions</b>						
<b>E.1 Living Wage</b>						
E.1.1	The company pays wages that meet or exceed verified living wage standards.					While a manual for defining 'living wage' has recently been released (2017), the methodology is not widely applied. The Core international standards for companies are ILO – which refers to minimum wages, not living wages.
<b>E.2 Occupational Health and Safety</b>						
E.2.1	The company commits to promote safe and healthy working conditions.					Indicator is clear but the commitment is not connected to performance.
E.2.2	The company has management systems in place which ensure a safe and healthy working environment for employees and contractors.					The presence of a system does not in and of itself ensure good safety performance that can be measured and compared.
E.2.3	The company regularly trains and tests its employees in good health and safety practices.					The focus of this indicator underpins good H&S performance but is difficult to measure/compare across companies.
E.2.4	The company provides for health and safety measures specific to women workers.					The indicator is unclear, some assertions in the description are questionable which makes it impossible to measure/compare.
<b>E.3 Collective Bargaining and Freedom of Association</b>						
E.3.1	The company respects the rights of workers to freedom of association and collective bargaining.					Indicator should make provision for companies operating in countries which prohibit collective bargaining, e.g. provision of alternative mechanisms if against national laws.
<b>E.4 Worker Recourse</b>						
E.4.1	The company has formal grievance mechanisms in place for workers (and their organisations, where they exist) to raise workplace concerns in an easily accessible manner and have them addressed.					A good indicator but moderately difficult to measure and compare across companies
<b>E.5 Non-Discrimination and Equal Opportunity</b>						
E.5.1	The company bases employment relationships on the principles of equal opportunity, and actively prevents all forms of discrimination in the workplace.					The wording is vague which makes it and therefore difficult to measure and compare. This indicator could reference international standards (ILO/ IESCR). In some countries laws might prohibit companies from addressing all forms, e.g. LGBT.
<b>E.6 Elimination of Forced Labour and Child Labour</b>						
E.6.1	The company works to prevent all forms of forced, compulsory, trafficked and child labour at its mine sites and in its supply chains.					The wording could be clearer which means that this might be difficult to compare across companies.
<b>F. Environmental Responsibility</b>						
<b>F.1 Environmental Stewardship</b>						
F.1.1	The company has management systems in place to conduct assessments of environmental impacts through an integrated approach, and to disclose them.					Ambiguous indicator – what is meant by integrated approach and disclosure to whom? Management systems do not necessarily equate to impact on the ground.
F.1.2	The company has systems in place for monitoring, evaluating and reporting on the management of the environmental impacts of its operations.					The existence of management systems can easily be measured and compared, but do not necessarily reflect impact mitigation/conservation measures on the ground
<b>F.2 Tailings Management</b>						
F.2.1	The company has systems in place for tailings management, including regular internal and external review and assurance processes.					The frequency of review and assurance reporting could be a useful but limited metric.
F.2.2	The company designs its tailings, waste and process facilities to prevent seepage and tailings dam failure and to protect the environment and communities from contamination and other impacts, including through the management of risks associated with potential changes.					The indicator is too broad, but has a good description of a high-level critical control to prevent TSFs failure. Several parameters that would need to be monitored to provide a robust measure of performance.

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<b>F.3 Air</b>						
<b>F.3.1</b>	The company publishes mine-site level air quality monitoring data in a timely manner.					The indicator is not specific on linking air quality parameters to anticipated impacts, which vary across operations. Need to clarify what is meant by publish – (e.g. publish where?) and what is considered timely.
<b>F.4 Water</b>						
<b>F.4.1</b>	The company implements a water management system that reflects its commitment and accountability to the rights and needs of the affected area, including the environment, communities, farmers and water-dependent industries.					Woolly description making it very hard to compare across companies. 'Water management system' is ambiguous, affected areas don't have associated rights, etc. and companies responsibility to water-dependent industries is questionable.
<b>F.4.2</b>	The company publishes mine-site level water quality monitoring data in a timely manner.					The indicator is not specific on linking water quality parameters to anticipated impacts. Need to clarify what is meant by publish – (e.g. publish where?) and what is considered timely.
<b>MS 4</b>	The operating company actively and inclusively engages local communities in decisions on water management and in implementing and sharing the results of water quality monitoring activities.					The use of the term 'implementing' is not advisable and makes it harder to demonstrate. Also decisions on water management extend beyond community stakeholders, what about government/ other actors?
<b>F.5 Noise and Vibration</b>						
<b>F.5.1</b>	The company has systems in place to limit the impacts of noise and vibration on communities, properties, and wildlife.					The existence of management systems can easily be measured and compared, but impacts on wildlife are especially difficult to measure
<b>F.6 Biodiversity</b>						
<b>F.6.1</b>	The company applies a mitigation hierarchy approach for biodiversity management.					Application of the approach is comparable, but the impact on biodiversity of applying the mitigation hierarchy is not.
<b>F.7 GHG Emissions and Energy Efficiency</b>						
<b>F.7.1</b>	The company monitors and minimises GHG emissions generated by its activities.					'Minimises' is vague – will lead to difficulty with measurement and comparison (e.g. is this absolute or intensity of emissions).
<b>F.7.2</b>	The company monitors and improves energy efficiency throughout its operations.					A blunt and slightly ambiguous indicator, which will make meaningful comparisons across different businesses very difficult
<b>F.8 Hazardous Materials Management</b>						
<b>F.8.1</b>	The company systematically identifies and manages potential risks linked to the handling, storage, emission and disposal of hazardous materials.					Generally OK as an indicator but would benefit from common definitions (e.g. a common risk rating level or reference to measurement of material events) to be more comparable
<b>F.9 Emergency Preparedness</b>						
<b>F.9.1</b>	The company has systems in place for developing and maintaining emergency preparedness and response plans.					The company may have systems but are they robust, addressing critical mitigation controls? Too general to provide meaningful or comparable measurement and validation.
<b>F.9.2</b>	The company engages local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans throughout its operations.					This is quite clear and relatively easy to measure and validate but the variability of approaches between companies makes it less comparable.
<b>F.9.3</b>	The company makes public all relevant information about financial assurance that is provided for disaster management and recovery.					Rather than making financial provision, this is something that is typically covered by insurance. Making this public is much less useful than engaging stakeholder on ERP (see below)
<b>MS 5</b>	The operating company engages local authorities, workers and communities in developing, communicating and testing its emergency preparedness and response plans.					Good choice of mine site indicator, but somewhat difficult to compare across sites.