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We believe that the RMI is a very welcome effort to promote much needed best practices in the mining sector, Still, I must re-emphasize that these comments reflect our personal/technical appreciation and in no way constitute a formal endorsement of the RMI by the IDB.

We have done our best to be as brief as possible, and remain at your disposition for any clarifications you might require.

COMMENTS:

Please provide additional information on the sources of financing for the initiative (donors).

Introduction, Audience. Stakeholders interested in RMI results. Academia/Think Tanks are part of Civil Society? The CS category (as stated) is confounding.

Selection methodology. Define overall analytical scope more precisely (what role for social/environmental footprint, company value, etc.? explicitly address potential alternative, if worse, criteria); also it will be key to more transparently acknowledge the potential for selection bias in determining mining operations (you seem to prefer mines in more challenging contexts; mines will be sold/transferred/extended over the years, which might create challenges for intertemporal comparisons of the RMI). Acknowledge more explicitly the role of the mining companies/civil society in mine selection.

Land use indicators: consider environmental protection/rehabilitation offsets (environmental remediation bonds?). Measures of environmental/social footprint will make more sense with information about context (population/water energy transport availability, etc.). Local economic development plans, as included in EIA, could provide a common ground for comparisons across jurisdictions.

Cross-mine indicators: In addition to company and mine-specific indicators, consider sector and region issues: (i) coordination with other companies to manage/mitigate cumulative/synergic impacts; and (ii) accessibility and information transparency consistency across operations, etc..

Associated infrastructure. Investments in infrastructure necessary for project development could also be considered in the lifecycle management section (procurement practices and other large project indicators, etc.)?

Data collection/analysis. What role for civil society/government monitoring company activities? Perhaps additional information on the RMI steering committee; information gathering methodology (for desk-based phase) would help. The challenge will be to remain consistent with the normal information availability asymmetries. What will be the in-country support structure for data gathering/fact checking activities?

Integrity. What measures will to implement to ensure that there is no manipulation of the RMI? e.g. Secure data management/confidentiality/openness/etc. Will you be accept leaks, direct informants, etc. on company behavior, etc. A more detailed section on safeguards would be welcome.