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Firstly, congratulations on the project thus far. It is a needed piece of work. Weighing in on the policies and impacts of mining firms can become a catalyst for change and improvement.

My main comment is that after reading the 46 page executive summary and scanning the 100 or so pages of the document, I am still not sure how the index is going to be calculated. The questions are relatively vague and the information that you will receive on each firm does not seem it will necessarily be comparable. An alternative method would be to construct a questionnaire or list of detailed questions, looking for precise, if possible measurable, information. Regarding local content and procurement, for example: What percentage of the workforce has been hired locally? What projects have been put into place to facilitate that? Have employment and procurement opportunities been published online? In local journals? Did the firm consult a platform for procuring locally, if one is available? On training programmes and capacity building: does the firm train employees? How many have received training in the past year? Does the firm have a suppliers' development programme and if so, how extensive is it? Etc.

If you do not have clear, precise questions and measurable outcomes on which to base your index, the results may be perceived to be influenced by judgement calls and the level of sophistication of the communications team at the firm. If you base the six issue areas on a finite number of measurable indicators, you could expand the indicators as you get more leverage in the firms and can influence what they report.

It is also unclear how you will calculate an index or ranking. How are you going to attribute a value to each sub-item? How will the items be aggregated? How will missing information be handled?

Some specific comments on the index:

- Scope: it will cover 30 firms. Are these broadly the ICMM members? In this case, is ICMM involved? Will coverage of firms be expanded? I suspect some of the worst practices are among medium sized firms that have less developed company policies and are less concerned about reputational risk.
- Are the firms on board? That does not come out clearly from your text. What are you going to do if they do not want to be surveyed?
- Companies will be ranked relative to each other, not assessed against an absolute standard (p. 16 of the exec sum). This is going to be very difficult. Firms use different methods of engagement which cannot be compared. Easier would be to compare using a benchmark (as above, measurable indicators). Also, it will be difficult to assess firms against each other if, as will be the case, there will be many holes in the reporting by individual firms or they will be reporting on vastly different aspects.
- The text affirms that it will measure on-the-ground reality. That indicates to me that there will be mine site visits or other confirmation of the mine site environment. However, on p. 18 that

does not seem to be the case. You seem to use company provided information, public reports, and “credible” community reports. How are you going to determine what is credible? This is going to be especially difficult in the case of controversy, if no independent verification will be undertaken.

Again, I want to congratulate you and offer support for this much needed initiative. My comments encourage betterment of the initiative through greater precision of indicators, including measurement where possible.