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First of all, I would like to praise RMF for the impressive work that has gone into drafting this document. It displays a thoroughness of the coverage of issues of relevance to mining that I have rarely seen before. It is immensely informative and is well on course to become a key reference on responsible mining as it sets out to achieve.

In light of this exhaustiveness I only have a few comments.

On methodology

1. The value addition of the RMI is the ranking of 30 companies according to a pre-established set of indicators related to company and mine specific data. If this document will be made available as a supplement to the rankings it would be helpful if the text on page 20 could be elaborated upon for the reader to better understand the choices of weighting. As with any index these will be key in shedding light on the primary focus of the RMI.
2. The review process before finalisation and publication by the RMF consists only of a company review. This does not do justice to the inclusive approach demonstrated during the wide consultation process of the design of the methodology. Considering that most information comes from publicly available sources going back to two years and company data, the process should have a built-in external review process before being published. Doing so will also limit errors in light of the prospective difficulties in generating measurable indicators on some of the issues addressed. Costs and confidentiality might be an issue but should not be insurmountable. The nature of such an external review could be subject to discussion. Possibilities include a group composed of country or industry experts.

On company action and effectiveness

3. It is good news that the RMI is not shy away from including effectiveness measures across issue areas despite real "attribution" challenges.
4. I am curious about how the methodology would actually account for timespan issues, beyond the two years for which the data will be collected (if my understanding is correct). However, beyond the specifics of the company's operations (e.g. wages and procurement) there might be a time lag before the combined impact of actions taken by the government and companies (e.g. infrastructure projects) could clearly translate in broader socio-economic development outcomes.
5. Similarly, one gets the impression that measurements will be restricted to post-operations matters. And yet, a lot happens beforehand that should also be captured. In particular, it would be interesting to see how the RMI would account for companies' involvement in policy processes prior to the start of mining operations: i.e. the process related to contract negotiations and the design of the fiscal regime for the mining sector or whether infrastructure was designed in view of the needs of other sectors of the local economy and made multi-user right from the outset or not. Again these might be longer term

issues. Under the right conditions, these issues play a central part in the enabling the unfolding of socio-economic development outcomes of mining projects.

6. There should be scope for establishing links between information from B5, B6, B7 and B8 with the performance of the host countries of mining projects on some of the international rankings that are available on governance and broader doing business indicators.

7. More generally, it would be interesting to see if the RMI can leverage on the exhaustive information base that it seeks to establish to capture what happens at the interface between company commitments, actions and effectiveness and economic development, national, sub-national and regional and socio-economic development planning as well as country characteristics.

8. To sum up, I think that the value-addition of RMI rankings would greatly benefit from expanding the scope of data collection and validation beyond companies and mines, to include the enabling environment within which such operations are conducted.