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At this stage in the process, it is more practical for our feedback on the Draft Methodology, to broadly address some conceptual, strategic and operational themes, as follows:

Conceptual

1. Overall, we encourage initiatives that contribute to advancing concrete options for optimizing the beneficial development impact of the mineral sector. RMI--given its stated objectives--could help advance concerted efforts in this regard.
2. In particular, while it appears that yet another initiative to enhance beneficial development impacts could potentially deepen the "initiative fatigue" in this sector, one of RMI's key value-added elements is that its scope would mainly cover the industry. This scope complements other initiatives, which generally tend to focus on public sector and civil society actors.
3. Nevertheless, in order to amplify the RMI's value-added element noted above, it may be helpful for the Methodology to go a little bit more in-depth, about what you mean in characterizing RMI as a "relative ranking" of companies, and not a benchmark, certification or standard. Otherwise, it could seem like a distinction without a difference, and this may create some misconceptions.

Strategic

1. In terms of Economic Development, as well as the other Issue Areas, and considering perspectives for the industry, there is a lot more scope to build on the potential for Linkages with other sectors of the economy. Currently, while several potential linkages have been highlighted, the Draft Methodology seems to frame these in secondary terms rather than as a primary option. The reality is that Mining it itself creates relatively few jobs. To a considerable extent, its potential impact in other areas of economic development is mainly through the various linkages that it catalyzes in other areas of the economy. This goes beyond big ticket infrastructure and energy aspects alone. It includes various types of fiscal, backward, forward and knowledge linkages that can be optimized. Perhaps a more direct consideration of Linkages or indicators of various types of linkages would be more robust and innovative in factoring in Economic Development.
2. The issue of Linkages should also present more opportunities for the industry to showcase its contributions in this regard. A typical mining company spends over 61 percent of its total investment on infrastructure and procurement – more than three times what is paid in taxes. Investment through linkages presents opportunities for governments to align their development policies in ways that capture greater value from mining.
3. Generally, in terms of inspiration from the AMV, three main elements would typically be discernible with regards to mineral sector management. These include the linkages factor; a regional dimension; and a strategic planning element. The linkages component has been highlighted above. The regional dimension would typically seek to factor in regional value chains. Given that RMI focuses on companies that typically have operations across regions and sub-regions, it may be worth exploring how to factor this in. Perhaps the fact that the indicators

are applied at a corporate level, would provide more scope for teasing out more of a regional dimension in the Methodology. With regards to the strategic planning element, AMDC's research indicates that it is not necessarily due to weak institutions and ineffective regulations that countries continue to be unable to take advantage of booms. Rather, it is the lack of long-term vision and effective policies, which create weak institutions and laws, unfit for transforming the mining sector in Africa.

Operational

1. In practice, it would be important for the expectations and roles to reflect the political economy realities on the ground. For example, with regards to the industry helping with "...strengthening the capacity of producing country institutions to manage mineral resources and tax revenues so that the economic benefits of mineral development are widely shared and sustained (See A.3, B.5 and B.6), it is essential to note that this is an area generally considered to be one of the most potent areas relating to state sovereignty. Thus, if the industry is to be involved in this, the sensitivities need to be factored in, very robustly.
2. Operationally, the indicators would need to be more robust. For example, in the areas where it is expected that the company "considers" how its actions or related investments relate to one issue or the other, it is important to note that, in practice, "considers" covers a broad range of actions or in actions.
3. Finally, RMI could indeed present scope for synergies with other initiatives. It would be worthwhile exploring how this could include for example, the African Minerals Governance Framework (AMGF), Responsible Minerals Development Initiative (RMDI) and especially the AMV Compact with the Private Sector.