Introduction to the Draft IRMA-Ready Standard for **Responsible Mineral Exploration and Development**

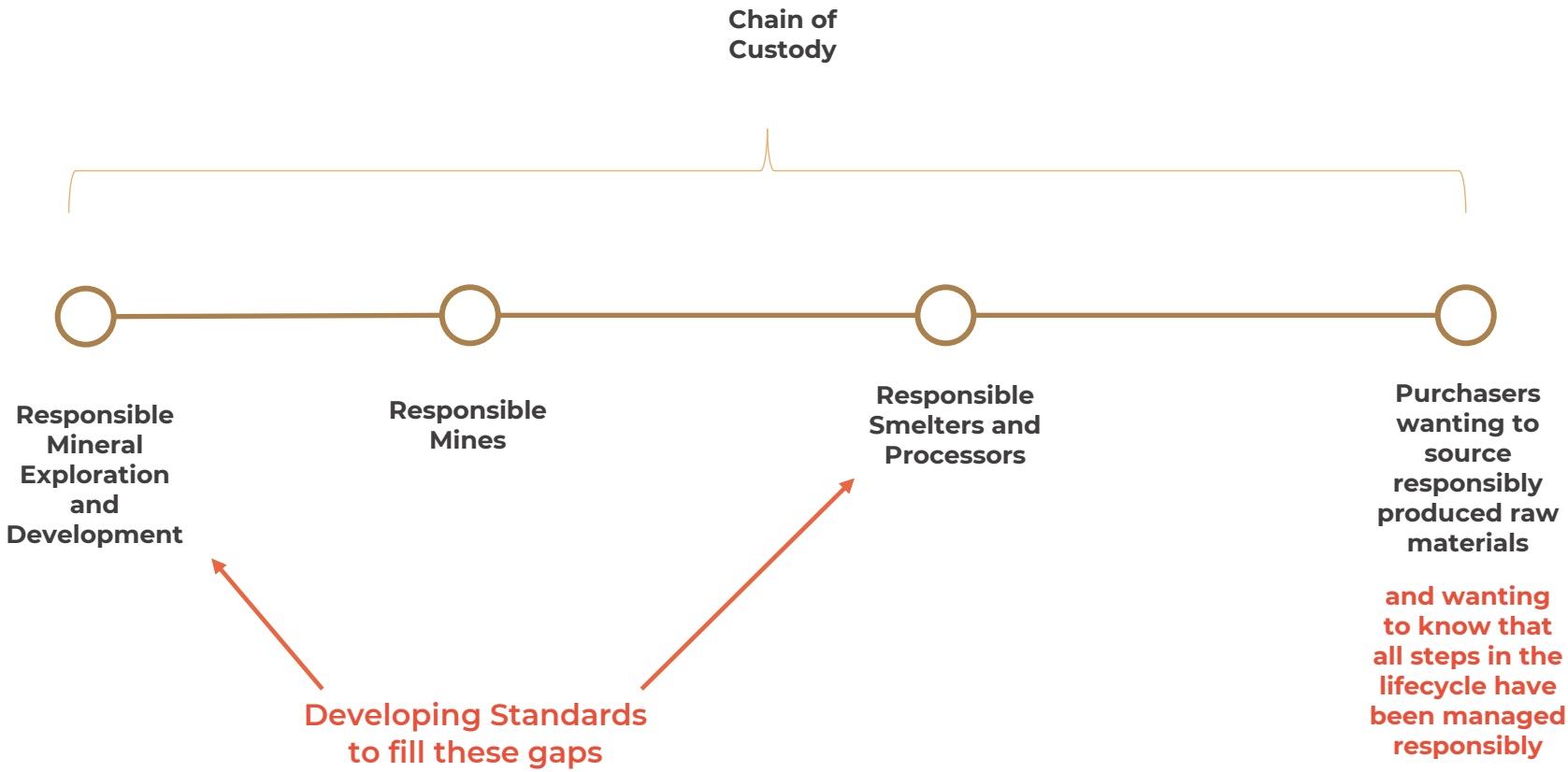
December 2021

IRMA Initiative for Responsible Mining Assurance

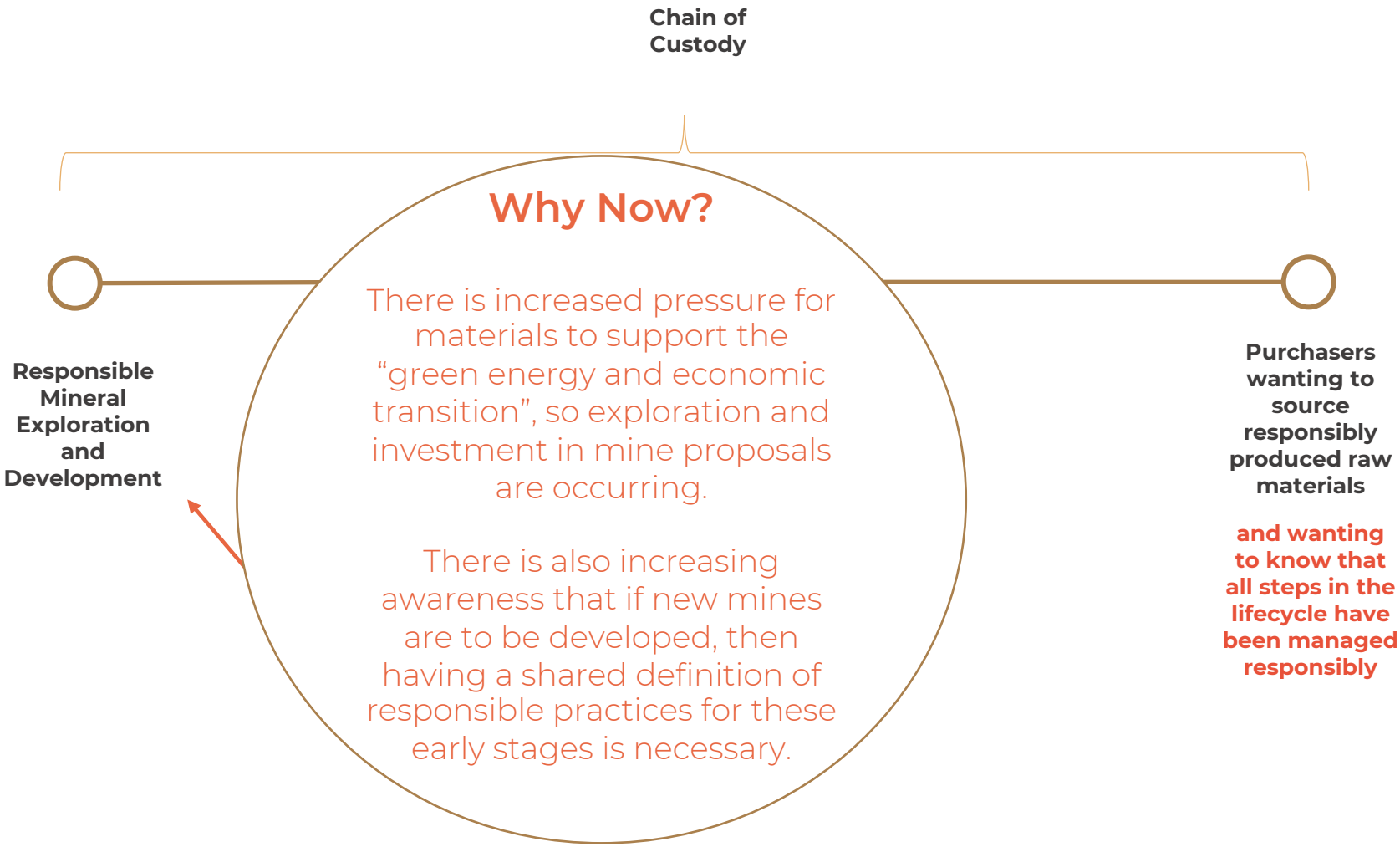
OUTLINE

- How the **IRMA-Ready Standard for Responsible Mineral Exploration and Development** fits into the IRMA System
- Why use the standard?
- IRMA's phased approach to addressing different stages of exploration and development
- Unpacking the IRMA-Ready Standard document and contents
- The public consultation process

IRMA Standards Landscape



IRMA Standards Landscape



IRMA is creating a voluntary certification system **for mineral exploration and development projects**

The system has two components:

1. The IRMA-Ready Standard

- Best practice requirements on 26 topics – a comprehensive and rigorous exploration and development standard
- Based on the IRMA mining standard, but will go though its own global multi-stakeholder review process

2. A third-party, independent assurance process

- Auditors external to the company will evaluate whether a project is meeting the IRMA requirements
- Likely to be notable reduction in time/cost compared to mining standard assurance

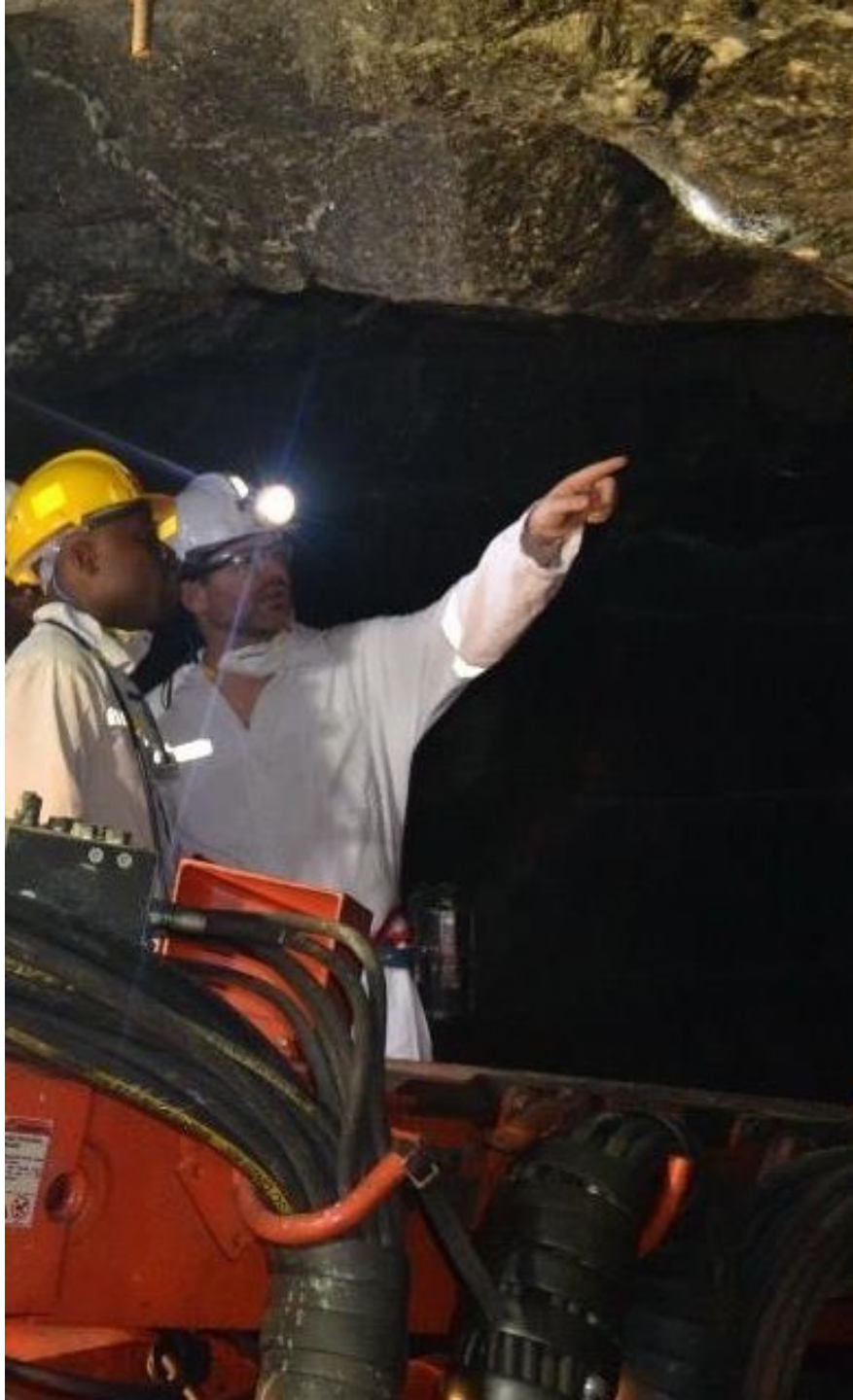
The IRMA-Ready Standard

Focused on best practices for activities that occur prior to the operational phase of a mine.

It is referred to, in short, as the **“IRMA-Ready”** Standard because it is assumed that any project that meets the requirements in the Standard will be well prepared to also meet the requirements in the IRMA *Standard for Responsible Mining* if a project becomes an operational mine.

IRMA-Ready independent, third-party assessments

- An audit will be required in order for an exploration project to be certified and/or make claims about achievement
- Audits will include input from stakeholders and rights holders
- Summary of results will be made public
- Companies and stakeholders will have access to a complaints mechanism if they disagree with results.
- We will develop competency requirements for auditors, trainings for auditors, and review our certification rules to see if any changes are necessary to bring this standard into the IRMA system



IRMA-Ready System **Fundamentals**

1

For industrial-scale mineral exploration and development projects

Not geared to artisanal-scale exploration, not for deep sea

Is meant to include brine-based exploration and development projects

2

Applies to all materials

Except energy fuels such as uranium, thermal coal, oil sands, oil and gas

3

Assessment is at the project level

Exploration and development companies aren't certified, but can put all of their projects into the system if they choose

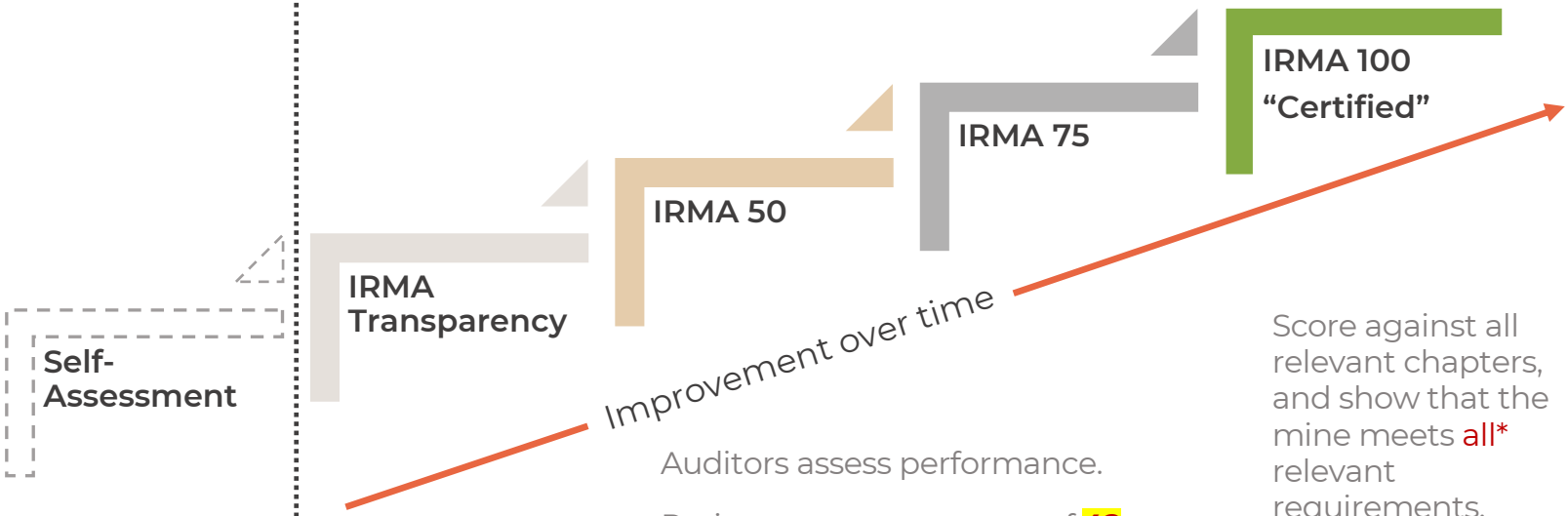
4

Certification is at the best practice level

But projects at any performance level can participate, and show continuing improvement over time

IRMA Achievement Levels

Not an Achievement Level



Self-Assessment

Projects rate themselves.

Self-assessment required for projects moving to 3rd-party, independent assessment.

May opt to share publicly.

IRMA Transparency

Auditors assess performance (may be one chapter, entire Standard, or something in between).

Publicly share results.

IRMA 50

Auditors assess performance.

Projects must meet a set of **42** critical* requirements, as well as 50 or 75% of the requirements in each of the four Principle areas of the Standard.

* some minor nonconformity allowed if timebound corrective action plan in place

Publicly share results.

IRMA 75

Score against all relevant chapters, and show that the mine meets all* relevant requirements.

* some minor nonconformity allowed if timebound corrective action plan in place

Publicly share results.

—Must undergo independent, 3rd-party audit and share results publicly to be able to make public claims about reaching an achievement level—

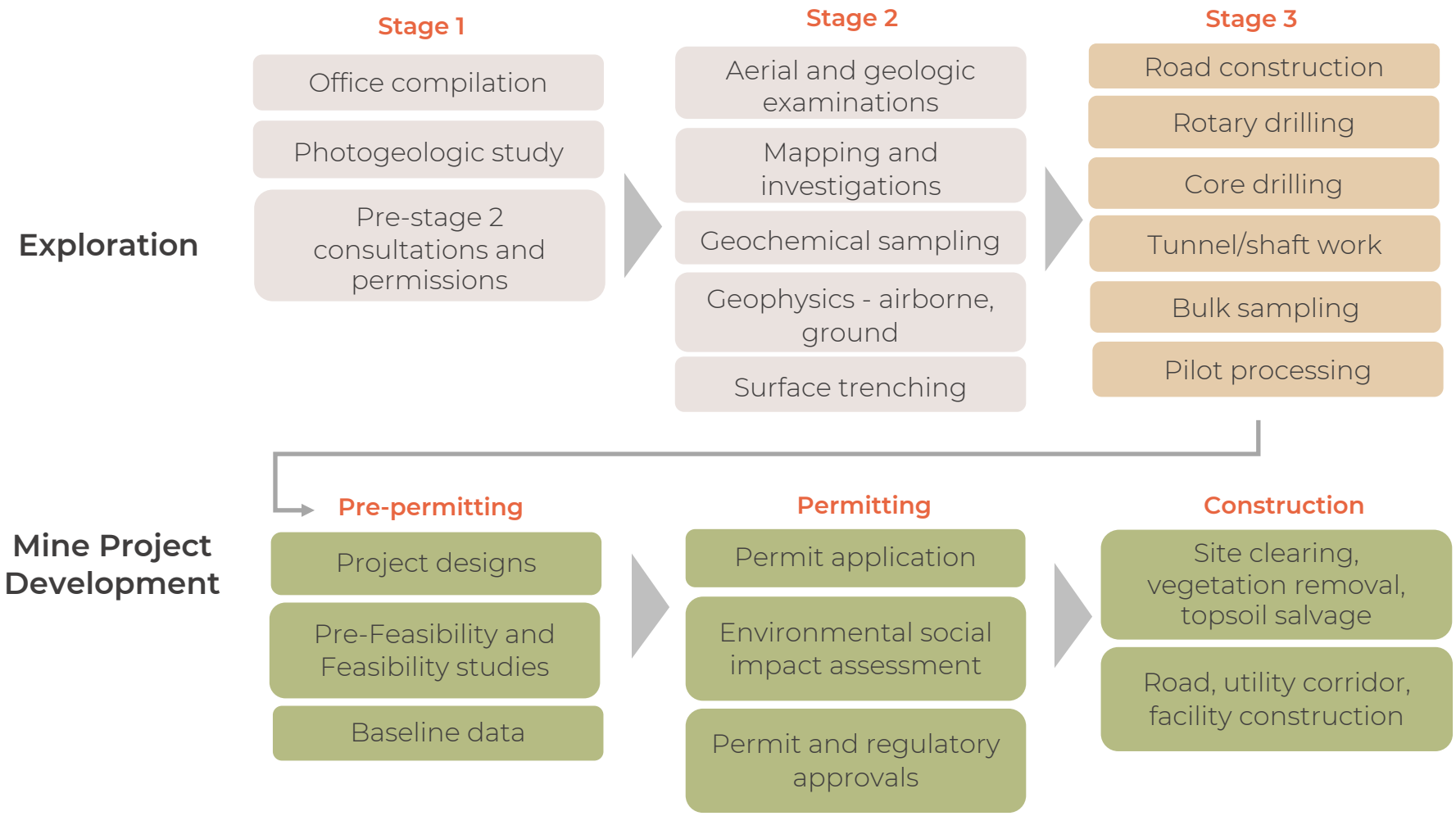
IRMA-Ready: Why Use It?

- A way for companies to demonstrate, and purchasers, investors and civil society to assess that a company is **striving to achieve best practices** from the beginning of project activities
  - Early phase is the time when **opportunities exist** to avoid culturally/environmentally/politically sensitive areas
  - Best time to **design-in safeguards**, select the best technologies and equipment
  - Appropriate time for free, **prior** and informed consent
- Early engagement important for **building a foundation of trust between companies and stakeholders**, and early awareness and and information sharing enables more meaningful engagement and ability of stakeholders to contribute to project decisions
- Evaluating projects against best practices can **differentiate between projects**, inform investment, and contribute to a discussion on social licence to operate

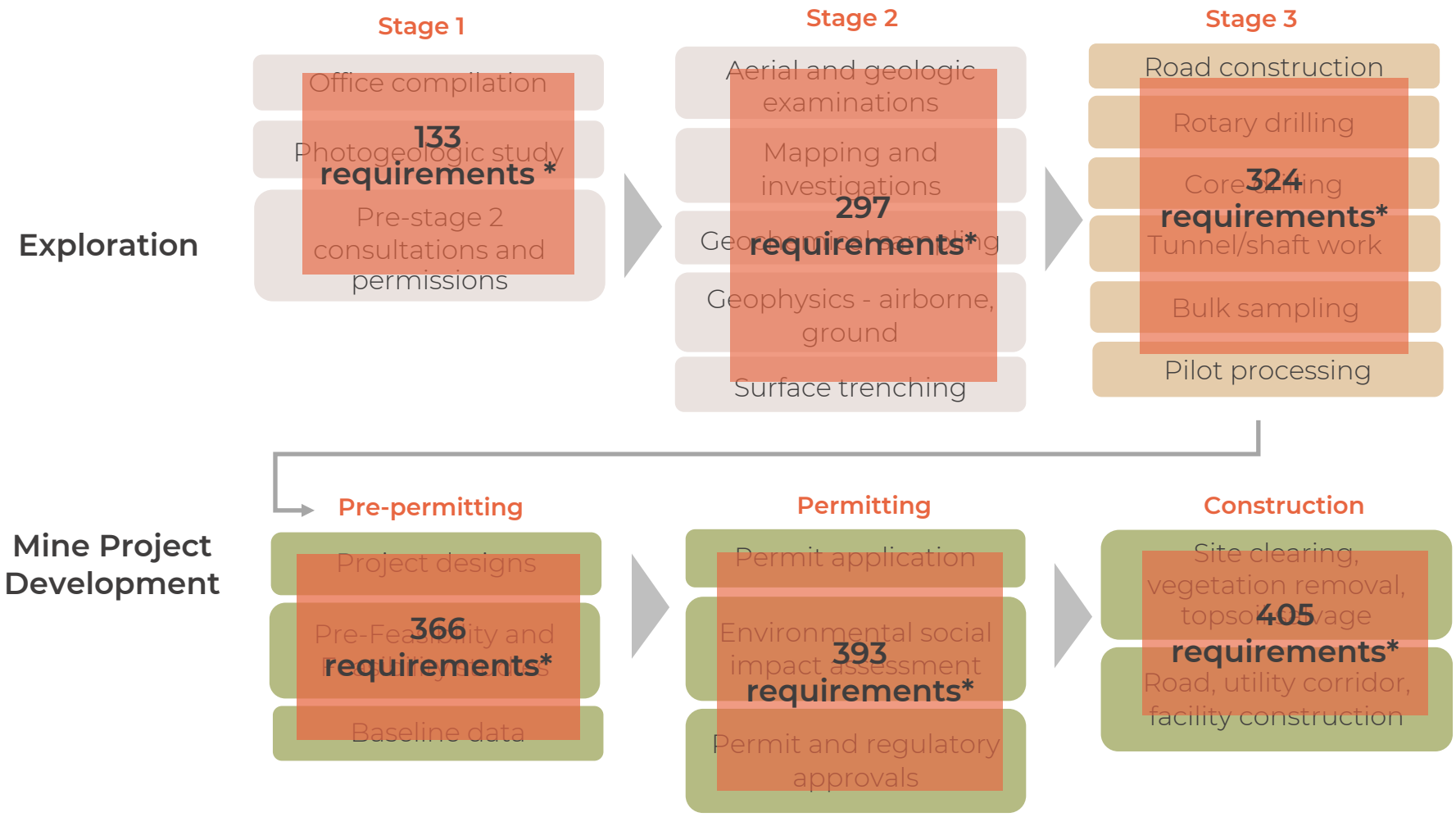
IRMA-READY Phased Assessment Approach

to address different stages of exploration and development

Exploration and Development Phases



Different sets of requirements for different stages



*** Actual number will be lower if some chapters not relevant (e.g., FPIC, resettlement, cyanide, etc.)**

Exploration Phases

Exploration Reconnaissance

Stage 1

- Office compilation
- Photogeologic study
- Pre-stage 2 consultations and permits

133 requirements

No on-site activities at this stage.

- Some company policies should be in place or under development
- Required to look at IRMA no-go areas - cease pursuing project if you want IRMA certification (e.g., areas where indigenous peoples live in voluntary isolation; certain protected areas, World Heritage Sites) and review other information to inform decisions on whether or not to proceed (e.g., ASM, resettlement, conflict-affected areas)
- Some chapters apply in whole, if relevant (e.g., legal compliance, FPIC).

Stage 2

- Aerial and geologic examinations
- Mapping and investigations
- Geochemical sampling
- Geophysics - airborne, ground
- Surface trenching

297 requirements

Airborne investigations, minor on-site activities or disturbance.

- Legal compliance, stakeholder engagement, grievance mechanism, human rights assessment, labor rights, assess and mitigate worker health and safety risks, have an emergency response plan, calculate GHG emissions, demonstrate broad community support
- If relevant, **prior to commencing exploration activities:**
  - — Carry out FPIC for proposed activities
  - — Identify cultural resources and prevent damage to critical resources
  - — Identify if resettlement necessary, and if so, avoid or assess/mitigate
  - — Manage risks related to security forces
  - — Identify if in a CAHRA, and if so, assess/mitigate risks

Exploration Phases

Exploration Investigation

Stage 3

- Road construction
- Rotary drilling
- Core drilling
- Tunnel/shaft work
- Bulk sampling
- Pilot processing

324 requirements

Increasingly invasive work is occurring.

- All of the requirements from Stage 2
- Plus:
  - Assessment of potential environmental and social impacts from exploration, and mitigation and monitoring
  - Increased stakeholder engagement
  - More in-depth characterization of sources of pollution and wastes, and waste and water management

Development Phases

Mine Project Development

In-fill drilling, additional exploration, exploration reclamation

Mine Pre-Permitting

- Baseline data
- Project designs
- Pre-Feasibility and Feasibility Studies

366 requirements

Starting to design potential mine and determine feasibility.

- Major portions of some chapters start to become relevant, e.g., environmental chapters, to guide planning and proposed mitigation strategies for proposed mines (but not monitoring plans)
- Begin environmental and social baseline studies for a proposed mining project
- NOTE: There may be continuation of exploration work. If so, requirements related exploration will also be relevant.

Permitting

- Permit applications
- Environmental social impact assessment
- Permit and regulatory approvals

394 requirements

Planning and getting permission for a mining project.

- Many full chapters start to be relevant
- Project is defined. Full-blown ESIA studies and assessment for proposed mining project under way, management plans must be developed and monitoring programs being developed
- Demonstration that you have policies and plans in place so that if and when your proposed mine is permitted and becomes operational it will be meeting best practices

Development Phases

Mine Project Development

Construction

- Clearing
- Earth moving, topsoil salvage
- Road, utility corridor, facility construction

405 requirements

Project approved and is being constructed.

- Impacts must still be managed during this stage, and labor-related requirements, stakeholder engagement, etc. are being implemented
- However, a fair portion of the requirements may not be relevant if they were carried out as required during Permitting, so this number could be reduced signficantly

- Plus:
  — Construction-specific requirements related to tailings facilities

UNPACKING THE DRAFT IRMA-READY STANDARD

Recommend you read the Note to Reviewers

NOTE TO REVIEWERS

This draft *IRMA-Ready Standard for Responsible Mineral Exploration and Development* ("IRMA-Ready Standard") has been produced in response to requests from IRMA stakeholders for a comprehensive standard that defines best practices during mineral exploration and development, prior to the operational phase of a mine. It is called IRMA-Ready because it is assumed that any project that meets the requirements in this Standard will be prepared to also meet the requirements in the IRMA *Standard for Responsible Mining* once it becomes operational.

The starting point for development of this draft was the IRMA *Standard for Responsible* Mining (referred to as the "Mining Standard"). However, certain terminology has changed, and numerous requirements have been adapted. Differences in wording between the Mining Standard and this standard, and differences between the various stages are colored in blue.

Reviewers are welcome to comment on any aspect of this draft Standard. Throughout the draft Standard, however, you will see NOTES and CONSULTATION QUESTIONS. These appear with a yellow background.

NOTES are informative, to provide readers with a background on the section, or drafters' notes, for example on why particular requirements were removed or combined in this Standard as compared to the Mining Standard.

CONSULTATION QUESTIONS are directed at reviewers. These are areas where the drafters are seeking input to help guide and/or improve the wording, help determine the scope or relevancy of proposed requirements, etc.

Comments may be submitted to IRMA: comments@responsiblemining.net

When providing comments back to IRMA, it would be appreciated if reviewers could reference specific Chapters, requirement numbers and/or consultation question numbers.

Deadline for Comments: 15 April 2022

Disclaimer

The draft IRMA-Ready Standard is being released for public review. IRMA seeks feedback, comments, questions and suggestions for improvement from diverse stakeholders globally.

This draft has been prepared by the IRMA Secretariat staff to catalyze global conversation and input, and does not represent content approved or endorsed by IRMA's multi-stakeholder Board of Directors for final application.

There are six stages of exploration and development included in the draft standard. These include:

Exploration Stage 1: Office compilation, photo-geologic study, pre-exploration investigations (e.g., review of previous studies, research, non-invasive site visit), pre-exploration consultations, application for exploration-related permits/approvals.

Exploration Stage 2: Aerial examinations, geologic examinations, mapping and investigations, geochemical sampling, geophysics-airborne/ground, surface trenching.

Exploration Stage 3: Road construction, rotary drilling, core drilling, underground work, other surface work (e.g., surface facilities to support underground work), bulk sampling, pilot processing plant.

- If additional exploration or in-fill drilling is performed during mine pre-permitting and permitting stages, then the requirements of Stage #3 are applicable to those activities.
- If additional in-fill drilling or exploration directly adjacent to the mine is performed during mine construction and operations, the requirements of the IRMA Standard are applicable.

Development – Pre-permitting Stage: Baseline environmental data collection, stakeholder engagement related to mining project proposals, project level FPIC determination, project designs, feasibility study.

Development – Mine Permitting Stage: Permit applications and environmental social impact assessment, permit finalization.

Development – Construction Stage: For new projects, applies to the period between permit finalization and initiation of operations. Includes site clearing, topsoil salvage, development of utility corridors, construction of roads and facilities (may only be first stage or site – other stages may occur after operations have commenced).

NOTE TO REVIEWERS ON THE STAGES OF EXPLORATION AND DEVELOPMENT, AND HOW THEY HAVE BEEN MANAGED IN THIS DRAFT STANDARD

We realize that there may be differences of opinion on what can/should be included in each stage.

CONSULTATION QUESTION 1: Do you feel strongly that some of the activities in these categories should be shifted to a different stage? Or should any stages be described differently? If so, please explain your rationale.

We also realize that there can be overlap between the stages. We are proposing, therefore, that when applying for an assessment a company would be assessed against the latest stage of exploration or development that includes any of the IRMA-defined activities being carried out by the company. For example, an exploration company may be trenching and starting to drill. They should be assessed using the Exploration Stage 3 criteria, even though trenching is also listed in Stage 2.

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Some aspects of Stage 3 exploration, such as in-fill drilling, bulk sampling and reclamation of exploration sites, may happen concurrent with Pre-Permitting/Permitting/Construction. In such cases, the company will be expected to be meeting both the exploration-related requirements for Stage 3 activities and the Pre-Permitting/Permitting/Construction requirements.

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Reviewers should be aware that during Pre-permitting and Permitting there are two aspects that are relevant in some chapters:

1) Requirements usually need to apply to the proposed mining project (e.g., stakeholder engagement, assessments of mine proposals, preparation of management plans, monitoring plans, etc.).

2) Requirements sometimes need to apply to project development activities[1] (e.g., sampling or data collection, preparing permit applications, meeting with stakeholders, fulfilling regulatory obligations, etc.).

This creates some complexity in some requirements, because where both aspects are relevant the requirements can be dual-faceted. For example:

[1] We are proposing the following definition for **project development activities**:

Field- and office-based activities carried out during the pre-permitting and permitting stages to develop a mine proposal, support the environmental and social impact assessment of a proposal, generate information necessary to fulfill regulatory and permitting requirements, engage with stakeholders and rights holders, and maintain company operations.

"3.2.2.1. The company shall . . . identify and assess the significance/consequence of the full range of potential hazards associated with project development activities. **It shall also** carry out a separate process for the proposed mining project, that includes, at minimum, assessing hazards related to. . ."

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Construction often includes many of the requirements found in Permitting. The rationale is that if a company decides to commission an IRMA audit at the Construction stage, and certain activities that were supposed to have happened during Permitting did not occur (e.g., assessments, development of policies, procedures, etc.), then in most cases we set the expectation that these elements be fulfilled before the mine is operational, i.e., during the Construction stage.

HOW THE STAGES ARE REPRESENTED

Beneath each requirement, there will be a list of all of the stages of exploration and development to which the requirement applies. If a stage is missing, it means that the requirement does not apply at that stage.

In some places readers will see essentially the same requirement repeated numerous times, and there will either be a solid bar or a striped bar to the left. The bars indicate the following:

There are differences in wording, but the **intent and level of expectation is essentially the same**. Differences in **wording between stages** are colored in blue.

EXAMPLE:

1.4.1.1. An operational-level grievance mechanism shall be in place to enable stakeholders to raise and seek resolution and/or remedy for the range of complaints and grievances that may occur in relation to the company and its exploration-related activities.

1.4.1.1. An operational-level grievance mechanism shall be in place to enable stakeholders to raise and seek resolution and/or remedy for the range of complaints and grievances that may occur in relation to the company and its proposed mining project.

There are differences in wording AND **different expectations between different stages**. Differences in **wording between stages** are colored in blue.

EXAMPLE:

1.2.1.2. Prior to seeking exploration permits, a stakeholder engagement plan scaled to the risks and impacts of planned exploration activities shall be developed.

First page of Note to Reviewers

NOTES TO REVIEWERS

Throughout the document there are drafting notes to:

—explain differences between this standard and the Mining Standard

—differences between Ex/Dev stages

—add rationale for new requirements or changes

CONSULTATION QUESTIONS

These are areas where IRMA is seeking particular input to from those with direct experiences or expertise, or to seek guidance on improvements, relevance, etc.

Reviewers can comment on anything in the Standard (and anything that is missing from the draft Standard).

Each Chapter has a summary of changes

To indicate headline elements, describe changes, pose consultation questions

Chapter 3.1—Fair Labor and Terms of Work

NOTE TO REVIEWERS ON CHAPTER 3.1:

Several suggested revisions have been made to this chapter based on changes to the Mining Standard that were proposed in the draft Mineral Processing Standard.[170]

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As noted in the Scope of Application, Chapter 1.1 states that "1.1.3.1. The company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA-Ready Standard by contractors engaged in activities relevant to the exploration or development project, including construction. . ."

This means that contractors have the same responsibilities as the company, and also that contracted workers need to be afforded the same rights and terms of work as those hired directly by the company (and also need to be subject to the same Occupational Health and Safety protections as per Chapter 3.2).

We have also added language in the Legal Compliance Chapter (1.1, requirements 1.1.3.1.a and b), requiring that companies provide:

a. Language in contracts that require compliance with the applicable requirements of the IRMA-Ready Standard; and
b. Monitoring of contractor performance on applicable requirements of the IRMA-Ready Standard.

This means the company needs to demonstrate to IRMA auditors that they perform some oversight or due diligence to ensure that contracting companies are meeting their obligations.

We are also proposing to provide more clarity on the expectation of and obligations to contractors by revising the definition worker as follows:

Previous definition of Worker: All non-management personnel

Proposed definition of Workers: All non-management personnel directly employed by the company. Also those engaged through third parties (for example contractors, brokers, agents, or intermediaries) who are performing work directly related to core business processes for a substantial duration of time (i.e., other than on a casual or intermittent basis) and who are geographically working at the project site.

CONSULTATION QUESTION 53: Are these actions enough, or would a better approach be to separate out contractor-specific requirements or highlight them in a different manner (e.g., add "and contractors" after each reference to workers when the company also needs to ensure that contractors are similarly protected)?

Note to Reviewers

How stages are represented in the Word doc (and pdf)

For each requirement, we indicate to which stage(s) it applies.

1.1.2.1. The company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements.[4] If complying fully with an IRMA requirement would require the company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.

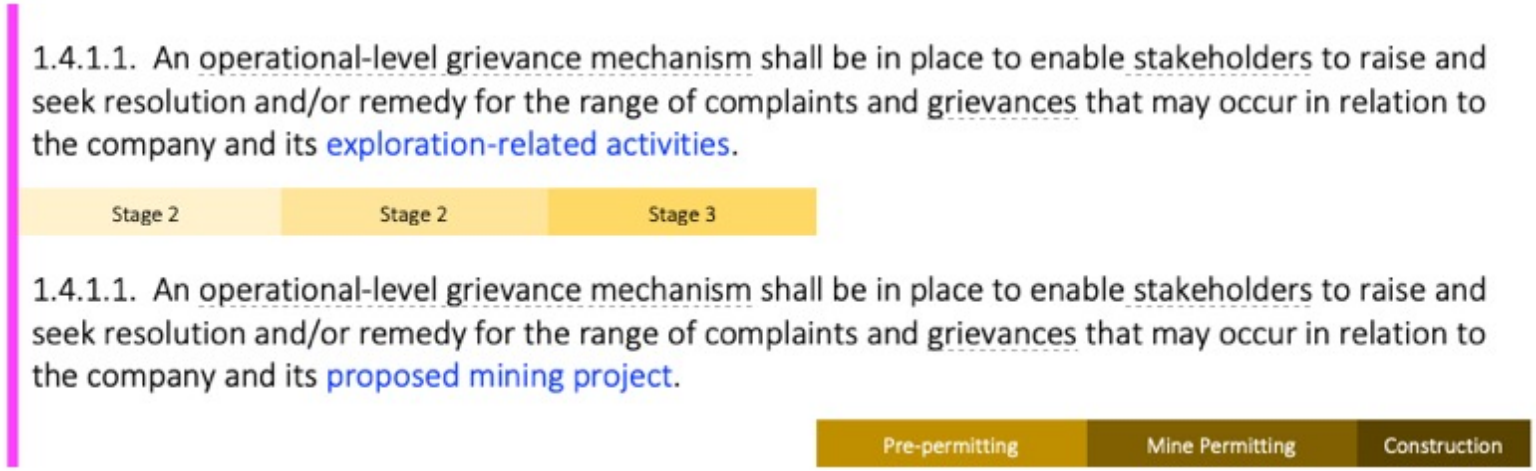
Note to Reviewers

How stages are represented in the Word doc (and pdf)

— If there are differences in stages, we show the specific language for each stage(s).

— Where there are differences in terminology, we tried to mark these in blue.

— And if we add a solid pink line, that indicates that there are differences in the wording, but not in the overall intent or level of expectations.

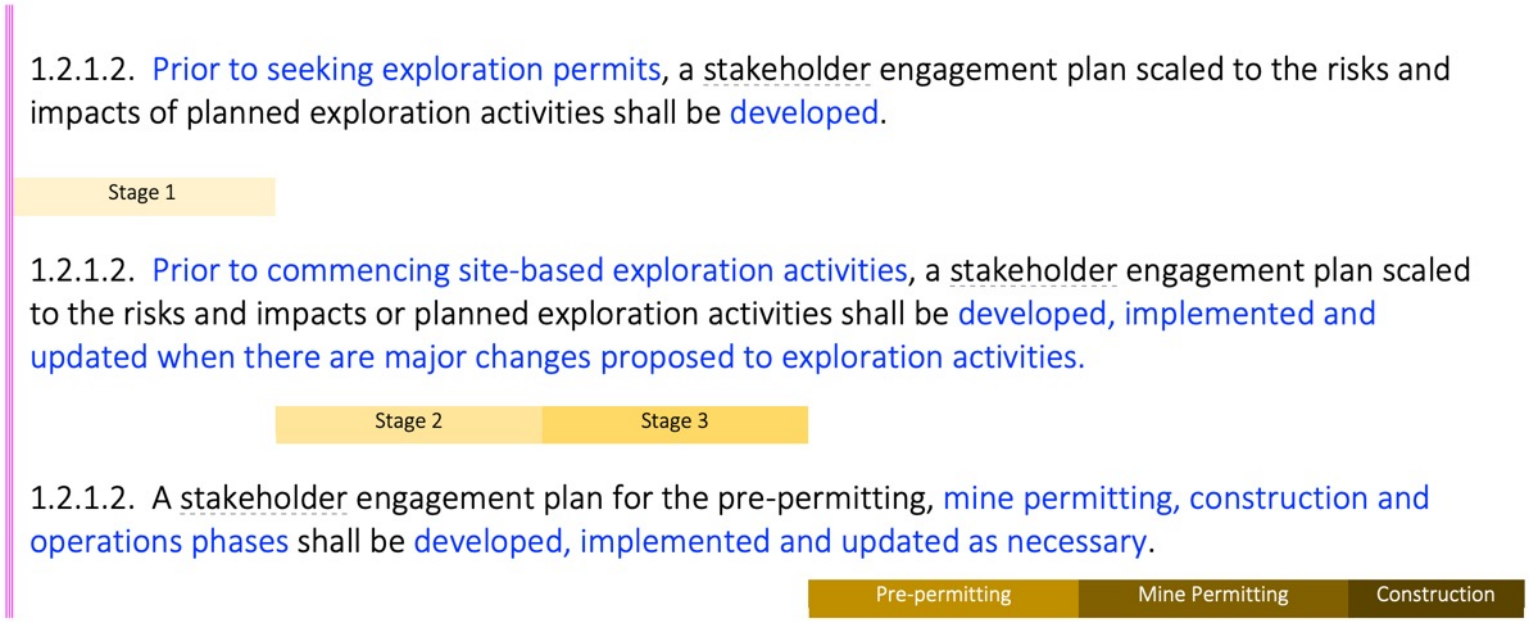


Note to Reviewers

How stages are represented in the Word doc (and pdf)

— If the differences in expectations between stages are more significant, to draw attention we use a triple-layer pink line.

— And again, we use the blue text to highlight differences in wording or expecatations.



How stages are represented in the Excel doc

Again, we use the blue text to highlight differences in wording or expecatations. But no pink lines.

Exploration			Development		
Stage #1	Stage #2	Stage #3	Mine Pre-permitting (Stage 4)	Mine Permitting (Stage 5)	Construction (Stage 6)
Office compilation, photogeologic study, pre-exploration investigations, consultations and permissions	Aerial examinations, geologic examinations, mapping and investigations, geochemical sampling, geophysics-airborne/ground, surface trenching	Road construction, rotary drilling, core drilling, tunnel/shaft work, bulk sampling.	Baseline environmental data collection, stakeholder organization, project level FPIC determination, project designs, feasibility study	Permit applications and environmental social impact assessment, permit finalization	The period between permit finalization and initiation of operations. Includes site clearing, topsoil salvage, development of utility corridors, construction of roads and facilities.
Stakeholder engagement shall begin prior to obtaining exploration permits, and shall be ongoing, throughout all stages of exploration, mine pre-permitting, permitting and construction.	Stakeholder engagement shall begin prior to obtaining exploration permits, and shall be ongoing, throughout all stages of exploration, mine pre-permitting, permitting and construction.	Stakeholder engagement shall begin prior to obtaining exploration permits, and shall be ongoing, throughout all stages of exploration, mine pre-permitting, permitting and construction.	Stakeholder engagement shall begin prior to obtaining exploration permits, and shall be ongoing, throughout all stages of exploration, mine pre-permitting, permitting and construction.	Stakeholder engagement shall begin prior to obtaining exploration permits, and shall be ongoing, throughout all stages of exploration, mine pre-permitting, permitting and construction.	Stakeholder engagement shall begin prior to obtaining exploration permits, and shall be ongoing, throughout all stages of exploration, mine pre-permitting, permitting and construction.

The Excel document

Notes

Footnotes

Consultation Questions

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
						Exploration				Development		NOTES ON CHAPTERS			
Chapter #	Name	IRMA Ready Criteria #	IRMA Ready Criteria Name	New requirement #	Critical req?	Stage #1	Stage #2	Stage #3	Mine Pre-permitting (Stage 4)	Mine Permitting (Stage 5)	Construction (Stage 6)	DRAFTING NOTES FOR CHAPTERS	DRAFTING NOTES FOR REQUIREMENTS	FOOTNOTES	CONSULTATION QUESTIONS
						Office compilation, photogeologic study, pre-exploration investigations, consultations and permissions	Aerial examinations, geologic examinations, mapping and investigations, geochemical sampling, geophysics-airborne/ground, surface trenching	Road construction, rotary drilling, core drilling, tunnel/shaft work, bulk sampling.	Baseline environmental data collection, stakeholder organization, project level FPIC determination, project designs, feasibility study	Permit applications and environmental social impact assessment, permit finalization	The period between permit finalization and initiation of operations. Includes site clearing, topsoil salvage, development of utility corridors, construction of roads and facilities.			the company), or that information could be accessed through legal	
1.2	Community and Stakeholder Engagement	1.2.1.	Planning and Designing Stakeholder Engagement Processes	1.2.1.1.		Prior to seeking exploration permits, the company shall identify the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as stakeholders) who may be affected by or interested in the company's exploration-related activities.	Prior to commencing Stage 2 exploration activities, the company shall identify the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as stakeholders) who may be affected by or interested in the company's exploration-related activities.	Prior to commencing Stage 3 exploration activities, the company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as stakeholders) who may be affected by or interested in the company's exploration-related activities. The analysis shall include efforts to understand community dynamics in order to prevent or mitigate community conflicts related to the exploration project and the company's engagement.	The company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's proposed mining project. The analysis shall include efforts to understand community dynamics in order to prevent or mitigate community conflicts related to the proposed mining project and the company's engagement.	The company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the company's proposed mining project. The analysis shall include efforts to understand community dynamics in order to prevent or mitigate community conflicts related to the proposed mining project and the company's engagement.	Prior to construction, the company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as "stakeholders") who may be affected by or interested in the construction of the company's mining project. The analysis shall include efforts to understand community dynamics in order to prevent or mitigate community conflicts related to the construction of the mining project and the company's engagement.	NOTE TO REVIEWERS ON CHAPTER 1.2: Criteria 1.2.4 differs slightly from the IRMA Mining Standard language (some information that was related was consolidated). One of the issues IRMA is seeking to address is how to deal with the issue of timing of activities. In many cases, the best practice is to initiate a certain activity at a particular point in time, often, the earlier the better. But not all projects will have undertaken activities at the appropriate time in accordance with best practice. If IRMA is rigid with its requirements, then projects that did not meet a timing element would not be awarded full points and could never reach IRMA 100.	There are slight differences in wording for the various stages of exploration and development. In Stage 1 of exploration, some stakeholder engagement is expected before permits are sought, but this is not as critical during earlier information gathering phases. Identification occurs again prior to Stage 2, as there may be a broader set of affected and interested stakeholders. There are different expectations beginning in Stage 3 of exploration. Stage 3 is when a deeper level of understanding and therefore analysis of potentially affected and interested stakeholders needs to occur, as there will be more ground-based activity, the company will be much more visible, and stakeholders will have more questions and concerns about the project's impacts and potential benefits. This deeper level of analysis of stakeholders carries	Explanatory Note for 1.2.1.1: Stakeholder analysis involves a more in-depth look at stakeholder group interests, how those interests will be affected and to what degree, and what influence stakeholders could have on the project. The answers to these questions provide the basis from which to build stakeholder engagement plan. It is important to note that not all stakeholders in a particular group or sub-group will necessarily share the same concerns or have unified opinions or priorities. Various activities being undertaken by a company (e.g., socio-economic baseline studies and livelihood studies) can inform both the identification of stakeholders and the existence of sub-groups within communities, and the analysis of stakeholders, as can consultations with the exploration team, site visits and consultations with local community members. Stakeholder mapping exercises and the	CONSULTATION QUESTION 4: Is it critical that engagement begin as outlined in the following requirements, or should IRMA allow full points as long as the company can demonstrate that during a particular stage the expectation is currently being met? Or should companies be recognized and rewarded for implementing practices at the time when they can be most effective?
1.2	Community and Stakeholder Engagement	1.2.1.	Planning and Designing Stakeholder Engagement Processes	1.2.1.2.		Prior to seeking exploration permits, a stakeholder engagement plan scaled to the risks and impacts of planned exploration activities shall be	Prior to commencing site-based exploration activities a stakeholder engagement plan scaled to the risks and impacts of planned exploration activities shall be	Prior to commencing site-based exploration activities a stakeholder engagement plan scaled to the risks and impacts of planned exploration activities shall be	A stakeholder engagement plan for the mine pre-permitting period shall be developed, implemented and updated as necessary.	A stakeholder engagement plan for the permitting period shall be developed, implemented and updated as necessary, and a preliminary stakeholder	A stakeholder engagement plan scaled to the risks and impacts of mine construction, shall be developed, implemented and updated as necessary.		There are slight differences in wording for the exploration and development stages. There is no need to update the engagement plan during Stage 1. But as		

Note to Reviewers

NOTE TO REVIEWERS ON THE STAGES OF EXPLORATION AND DEVELOPMENT, AND HOW THEY HAVE BEEN MANAGED IN THIS DRAFT STANDARD

Acknowledges that activities from 2 stages may occur simultaneously

Example: trenching from Stage 2 Exploration, and drilling from Stage 3.

In that case, project would be assessed according to Stage 3 requirements.

Acknowledges that exploration may continue while a company pursues mine development

In that case, your activities would be assessed against exploration requirements **and** the requirements for the appropriate stage of mine development.

Pre-Permitting and Permitting sometimes have two sets of expectations

— Those governing day-to-day or ongoing project development activities

— Those related to the proposed mining project

Second page of Note

NOTE TO REVIEWERS ON THE STAGES OF EXPLORATION AND DEVELOPMENT, AND HOW THEY HAVE BEEN MANAGED IN THIS DRAFT STANDARD

— Company needs to have health and safety plan in place for those actively engaged in project development activities like field work

— Company also needs to be developing a health and safety plan for the proposed or conceptual mining project

Pre-Permitting and Permitting sometimes have two sets of expectations

— Those governing day-to-day or ongoing project development activities

— Those related to the proposed mining project

Second page of Note

NOTE TO REVIEWERS ON THE STAGES OF EXPLORATION AND DEVELOPMENT, AND HOW THEY HAVE BEEN MANAGED IN THIS DRAFT STANDARD

Permitting

— Company failed to create a stakeholder grievance mechanism

— Company created a stakeholder grievance mechanism

Construction

— Then needs to occur during Construction

— If one already exists and meets IRMA requirements, then no need to create another one

— If doesn't fully meet IRMA requirements, then should be improved during Construction

Construction often includes the same requirements as Permitting

— Reason to include is that if not done during Permitting, a mine that wants to be assessed during Construction will need to demonstate these things have been done

IRMA-READY STANDARD REQUIREMENTS

The IRMA Standard

Comprehensive coverage of mining issues

Business Integrity

- Legal compliance
- Stakeholder engagement
- Stakeholder grievance mechanism
- Human rights due diligence
- Revenue transparency/anti-corruption

Planning for Positive Legacies

- Environmental and social impact assessment and management
- Free, Prior and Informed Consent
- Community support and benefits
- Resettlement
- Emergency preparedness and response
- Planning and financing reclamation and closure

Social Responsibility

- Labor rights
- Worker health & safety
- Community health and safety
- Conflict-affected areas
- Security arrangements
- Cultural heritage protection
- Artisanal and small-scale mining (ASM)

Environmental Responsibility

- Water management
- Waste (tailings) management
- Air quality
- Greenhouse gases emissions
- Noise management
- Biodiversity, ecosystem services, protected areas
- Cyanide management
- Mercury management

IRMA-Ready is based on the IRMA Standard for Responsible Mining:

- Changed mining terminology to exploration, or “proposed” mining projects, or mine construction
- Sometimes reduced level of rigor compared to mining standard
- Sometimes combined requirements to simplify
- In some cases added new requirements (e.g., Chapter 1.5, 2.5, 4.1) to address early phase issues or reflect changes in best practices since Mining Standard was finalized

Notable Chapters

2.1 Environmental and Social Impact Assessment

Only required in Exploration if screening indicates a need. But even if not full assessment, a plan to mitigate and manage impacts still required.

Only a few requirements relevant in Pre-Permitting (e.g., baseline data), but full chapter required for Permitting.

2.2 Free, Prior and Informed Consent (FPIC)

FPIC needs to be obtained at earliest stages of exploration (before licences, concessions obtained, before on-site work begins).

Applies to ALL stages of Exploration and Development.

2.5 Emergency Preparedness and Response

More specific requirements than the Mining Standard, which relied on alignment with APELL process. Lays out steps more clearly.

Integrates some elements from the Global Industry Standard for Tailings Management.

2.6 Reclamation and Closure

Scaled down requirements during exploration.

We have posed questions related to issues of liability insurance and financial assurance.

What happens if no company will provide insurance in a country, or no regulatory body will take responsibility for a surety bond?

Should IRMA still include those requirements (and some companies will simply score low on them)?

Notable Chapters

1.5 Transparency and Anti-Corruption

As with Mining Standard, we include transparency of payments to governments and transparency of contracts and exploration permits or licence terms.

Bolstered requirements related to anti-corruption, as the potential for undue influence may be heightened during early phases.

Added new requirements related to transparent and credible public reporting of exploration results, mineral resources and reserves. We have aligned with global international body – CRIRISCO – didn't want to re-invent the wheel.

4.1 Waste Management

Many new requirements from the Global Industry Standard for Tailings Management (GISTM). E.g, requirements related to accountable personnel (engineers, executive level oversight, independent reviewers).

New sections on design and construction of tailings facilities – Mining Standard did not cover these. Raises questions of whether we need to have similar criteria for other facilities.

4.5 GHG Emissions and Energy Use

Proposing that exploration companies calculate and report energy use and GHG emissions on a project basis, but unlike Mining Standard, no requirement to set reduction targets.

Projects proposed in Pre-Permitting/Permitting should be estimating emissions for Scope 1 and 2. And choosing efficient technologies, equipment.

Have asked Consultation Question about Scope 3 GHG emissions.

Notable Chapters

3.3 Community H&S

3.7 Cultural Heritage

4.4 Noise and Vibration

IRMA-Ready requires screening/scoping to determine if there is the potential for these types of impacts. This may have been done as part of Chapter 2.1 (ESIA). If there are potential impacts, however, there are specific mitigation measures laid out in these chapters that must be followed.

Chapter on Noise includes potential impacts on wildlife, as exploration and project development activities can cause disturbance and impacts that can have short-term (e.g., aerial overflights disrupting calving) and long-term impacts (e.g., building of roads that fragment habitat).

3.1 Fair Labor and Terms of Work

3.2 Occupational Health and Safety

In most stages, similar expectations to the Mining Standard, the rationale being any workplace should respect workers' rights and health and safety.

Exploration Stage 1 has slightly lower expectations.

Some streamlining to reduce overall # of requirements.

IRMA-Ready
Public Consultation Process

IRMA Board has approved for public release, but not endorsed

The draft IRMA-Ready Standard is being released for public review. IRMA seeks feedback, comments, questions and suggestions for improvement from diverse stakeholders globally. This draft has been prepared by the IRMA Secretariat staff to catalyze global conversation and input, and does not represent content approved by IRMA's multi-stakeholder Board of Directors for final application.

Context:

The draft IRMA-Ready Standard is based foremost on content already in practice in the 2018 IRMA *Standard for Responsible Mining* for mines in production. It differs in that it focuses on sections excerpted for relevance for the early phases of mine proposal and development so this content is easily accessible through just that lens. IRMA staff also filled gaps specific to that early phase. We encourage a full range of feedback from exploration and development companies, from communities where new mining is proposed, from NGOs, labor advocates, investors, purchasers of mined materials, subject experts and others. We also encourage the pilot testing of this draft at real locations on the ground to best inform ways this content should be changed and clarified to serve value for diverse stakeholders.

IRMA Draft Standard
Consultation Process

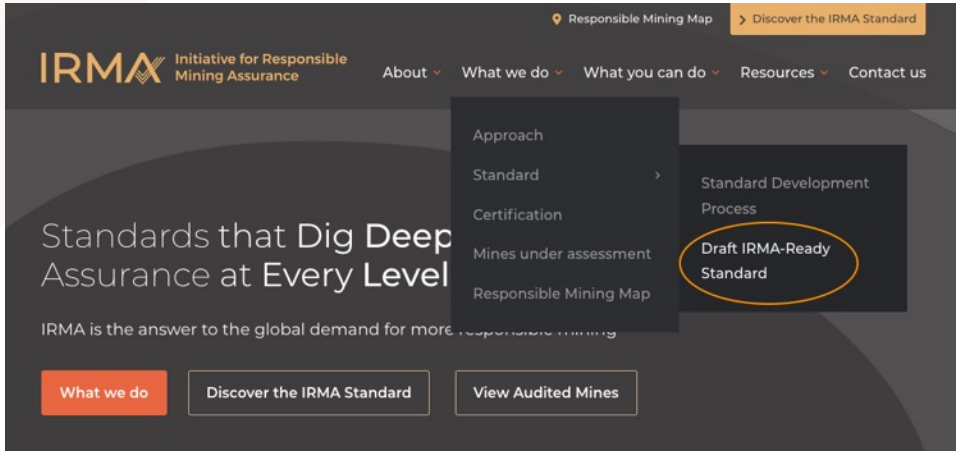
1. **Global stakeholders will have until 15 April 2022 to comment on draft standard**
2. **In 2022, more webinars offered and possibly working groups**
3. **IRMA will review comments, revise draft and release for another consultation**
4. **Finalize the standard based on input**

Send feedback to:
comments@responsiblemining.net

Piloting will occur coincident with public comment period, using Mine Measure self-assessment tool.

No claims of achievement can be made by participants engaged in pilot.

For More Information



Draft IRMA-Ready Standard

In December 2021, IRMA released a draft IRMA Standard for Responsible Mineral Exploration and Development (the IRMA-Ready Standard) for public consultation. We value your feedback on any aspect of the draft . The public comment period is open through 15 April 2022. Download the draft IRMA-Ready Standard.

The IRMA *Standard for Responsible Mineral Exploration and Development* (IRMA-Ready Standard) is a response to requests from exploration and mining companies, directly affected communities, purchasers, and others for a comprehensive standard that defines best practices during mineral exploration and development, prior to the operational phase of a mine. We refer to this as the "IRMA-Ready" Standard because an exploration or proposed mining project that meets the requirements in this pre-operational Standard should be well prepared to meet requirements in the IRMA *Standard for Responsible Mining* if the project is developed and a mine becomes operational.

- Why an IRMA-Ready Standard?
- What is in the draft IRMA-Ready Standard?
- How is the draft Standard being developed?
- Who should comment on the draft IRMA-Ready Standard?
- How can I pilot-test the draft IRMA-Ready Standard?

Download the draft IRMA-Ready Standard +

Webinars and Presentations +

https://responsiblemining.net/what-we-do/standard/draft-irma-ready-standard/

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Please feel free to reach out with additional questions: info@responsiblemining.net

IRMA Initiative for Responsible Mining Assurance