

# The Mining, Minerals, and Metals (M3) Partnership: Summary of Projects and Lessons Learned

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## Introduction

The Mining, Minerals, and Metals Partnership ([M3 Partnership](#)) is a collaboration of the Initiative for Responsible Mining Assurance (IRMA), Responsible Jewellery Council (RJC), ResponsibleSteel, and Towards Sustainable Mining (TSM). The M3 Partnership, made possible by the [ISEAL Innovations Fund](#) with support by the Swiss State Secretariat for Economic Affairs, aims to identify opportunities for alignment and collective action to drive improvement in social and environmental performance.

This report summarizes lessons learned across four key M3 Projects, including the Integrated Assessment Protocol (IAP) Tool, IAP Pilots, Greenhouse Gas (GHG), and Due Diligence Projects. Learn more about these projects and the M3 Partnership at the [M3 Partnership](#) website.

## Integrated Assessment Protocol (IAP) Tool

A focal point of the M3 Partnership has been creation and testing of an Integrated Assessment Protocol (IAP) Tool, designed to allow mine sites to be assessed against multiple site-level standards in a single audit. The IAP Tool supports identification of alignment across standards and promotes demonstration of conformity with multiple standards with greater efficiency and reduced cost. The M3 IAP is responsive to concerns that the number of mining standards can be confusing, costly, and time-consuming, risk greenwashing, and reduce the effectiveness of all.

The IAP Tool did not create a “single standard,” but identified common requirements across standards and retained unique requirements of respective standards where alignment did not exist. The macro-enabled tool allows users to activate a set of standards being used for a given assessment so that only the selected standards and requirements for those standards are shown. IAP tool users may activate only IRMA and TSM, for example, or only IRMA and RJC, RJC and TSM, or all three standards depending on the those used for a particular assessment.

The IAP assessment criteria were developed by mapping the requirements of IRMA, RJC, and TSM against a detailed set of themes and subthemes. Under each subtheme, an assessment question, or a series of questions, was generated to reflect the scope relevant across the three standards. Each question was then linked to the original requirement of each standard, if applicable. As a result, a question could be mapped to one or multiple applicable standards.

Similarly, guidance, either deemed mandatory or informative, was included as it was mapped to the original requirement of the standard.

The mapping was reviewed and agreed to by the three M3 Partnership members, and their requested edits were addressed in producing a final version, which was then inserted in the IAP workbook's data table.

Mapping the standards was a tedious but fairly straight-forward exercise supported by third-party consultants at ERM. Where there was a common requirement across two or more standards, this became an integrated requirement for those standards. Where there were different and/or additional sub-requirements, these became separate and independent requirements. The support from a third party is useful not only to support such a time-consuming and detail-oriented task, but also offered greater objectivity.

A more challenging aspect of creating the IAP tool was managing terminology and definitions. Key terms such as "stakeholder" versus "community of interest" (COI) and "operation" versus "site" were reviewed for accuracy and to maintain the integrity and requirements of each respective standard.

Perhaps the most challenging aspect was review of conformity levels, which vary by standard and ultimately were not integrated.

This phase of our project did not include deep review of alignment and differences in audit procedures, nor did it involve detailed review of reporting requirements. Importantly, the assessment procedures and reporting requirements have not been integrated, thus must follow the respective assessment and reporting requirements of each selected standard.

Two IAP Pilots, described below, informed further updates to the tool. The M3 Partnership plans to expand the IAP Tool over time to include additional standards and intends to release updated versions of the tool as this work is completed.

### **Lessons Learned: Creating an Integrated Assessment Protocol (IAP) Tool**

1. Utilize third-party support to review where standards align and where there are unique requirements; this delegation is useful to protect in-house staff time and also to enhance objectivity.
2. Allow substantial time for each party to review and comment on the alignment results and for comments to be integrated.
3. Hold focused meetings for review of key terms and definitions as well as review of conformity requirements to ensure that the integrity and requirements of each respective standard are maintained.

### **IAP Pilots**

The M3 Partnership undertook two pilots with mining companies to test and improve the IAP Tool. This section provides a summary of these pilots, case studies and lessons learned, and next steps.

The M3 Partnership undertook two pilots using the IAP Tool. One pilot was conducted with an Anglo American Platinum Group Metals mine in South Africa measured against the IRMA *Standard for Responsible Mining* and the RJC *Code of Practices Standard*. Another pilot was conducted with ArcelorMittal Mining Canada against the IRMA *Standard for Responsible Mining* and TSM.

### *Methodology*

The M3 IAP Pilots proceeded based on the following steps:

1. Outreach to mining company leadership, discussion of pilot opportunity, and completion of participation and communications agreements
2. Share the IAP tool, training video, and guidance document with the company and third-party assessment teams; hold trainings and Q&A session(s)
3. Collect assessment data
4. Pull all assessment data into the IAP Tool and run reports
5. Present pilot findings and discuss key takeaways, lessons learned, and next steps
6. Use experience from the pilot to improve the IAP Tool and methodology

### *Case Study One: Dances with Data*

One pilot was based on existing data from prior assessments conducted under the respective standards instead of data produced simultaneously in a combined assessment. This pilot benefitted from being less time and labor intensive for the company team as their work on the original assessments was already complete. This was especially important given added pressures on mine management, supply chain challenges, and other issues linked to the COVID-19 pandemic, inflationary pressures, and Russia's invasion of Ukraine.

Some practical challenges arose in this pilot including:

- access to original data from a prior audit
- management of data recorded in multiple languages by different assessment teams
- the possibility that the different parties conducting the original assessments may interpret criteria differently
- lack of data on some requirements as one standard was updated after the assessment against a prior version of that standard was completed
- analysis of data gathered in different years complicates data analysis and comparisons across multiple standards, an issue that is likely to persist without integrated audits as standard systems for the mining sector typically do not operate on aligned assessment schedules

While the IAP tool was not designed to merge separate self-assessments prepared for different standards in different years, this pilot demonstrated that there may be some value in using the tool under such conditions. Specifically, it was realized that in many cases, a mine will already have existing data for one or more standards in separate formats and may want to merge those data sets into a single format using the IAP tool before embarking on an integrated assessment process.

Through this pilot we learned that, while there may be some efficiencies for merging different data sets, a decision to use data from different years should take into consideration possible variables, including: (a) accessibility of data, (b) language(s) of data, (c) any changes in one or more standards in the IAP since the time of the data collected, and (d) other practical challenges analyzing data collected at different points in time by different parties and likely reflecting different circumstances at different points in time.

This pilot was an opportunity to use the IAP tool with a party already using multiple M3 Partnership standards and enthusiastic about the potential to increase efficiency through an integrated assessment. The opportunity to

learn about where standards aligned and where there are unique requirements was useful to all engaged in this pilot, as was the experience of working with and improving a new assessment tool.

### *Case Study Two: Strategies for Integrating New Standards*

Our other pilot involved conducting a single on-site audit to inform assessment against two standards—one that the mining company and assessment team knew well and another that was new to both the mining company and assessment team. This pilot required parties to learn a new standard and new systems in a relatively short timeframe.

An audit against any one of our standards is an intensive process, especially when it comes to conducting the on-site component of the audit. In this pilot the on-site was delayed until deemed safe under COVID-19 protocols. These necessary delays shortened the timeline available for completing the pilot, resulting in less time for managers to get buy-in from staff teams and for pilot participants to learn new standards and adapt to use of the IAP tool.

Onboarding a new standard also came with practical challenges as the assessment team took on multiple additional obligations including going through required trainings and approvals prior to the assessment; learning the unique requirements of the new standard and reviewing related guidance; and navigating use of a new tool. These assurance elements came as an addition to the already heavy lifting of reviewing company self-assessments, conducting desk-based and on-site assessments, reviewing data and evidence, and producing reports.

Both company participants and assessors preferred to use a static spreadsheet for collecting notes across departments; the macro-enabled IAP tool was new and there was insufficient time during the pilot for the auditors and site team to fully adapt to use of the tool.

Given the persistent time pressures faced by mine managers and third-party assessors, the need to learn new standards and new tools will remain challenges to address in any integrated assessment. Learning any new standard system and assessment tool will require an additional commitment of time and energy. While this was a challenge, the company was drawn to the opportunity to be recognized by two leading standards at the same time in a way that optimizes site personnel effort while also learning a new standard.

When onboarding a new standard for a company in an integrated audit, we learned the importance of considering the following variables: (a) availability

of time to train company teams and third-party assessors regarding the new standard and use of the IAP tool well before commencing an integrated audit, (b) sufficient time for management to get buy-in from the site teams who will be actively involved in the process, (c) ability to lengthen the timeline for the assessment and reporting to allow teams to navigate new standards and requirements, (d) establish strategies for coordinating data collection across tools and teams and importing data into the IAP tool in an efficient manner, and (e) clearly define pathways for recognition by the multiple standards including their respective reporting processes.

This pilot provided opportunities for all involved to learn more about a new standard and where it aligned with or was different from a standard in use; to learn about related assessment protocols and procedures; and to explore the possibility for completing an integrated assessment against multiple standards.

**Lessons Learned: IAP Pilots**

1. A decision to use data from different years should take into consideration possible variables, including:
  - a. accessibility of data,
  - b. language(s) of data,
  - c. any changes in one or more standards in the IAP since the time of the data collected, and
  - d. other practical challenges analyzing data collected at different points in time by different parties and likely reflecting different circumstances at different points in time.
2. When onboarding a new standard in an integrated audit, consider the following variables:
  - a. availability of time to train company teams and third-party assessors regarding the new standard and use of the IAP tool well before commencing an integrated audit,
  - b. sufficient time for management to get buy-in from the site teams who will be actively involved in the process,
  - c. ability to lengthen the timeline for the assessment and reporting to allow teams to navigate new standards and requirements,
  - d. establish strategies for coordinating data collection across tools and teams and importing data into the IAP tool in an efficient manner, and
  - e. clearly define pathways for recognition by the multiple standards including their respective reporting processes.

## GHG Project

The M3 Partners recognize the vital role of our standards and partnership in building consensus and progressing ambition, alignment, harmonization and interoperability of GHG emissions data, while also providing robust and credible assurance systems. Such efforts can avoid duplicative data collection and reporting efforts, and ensure that data is appropriate, accurate, and comparable.

Our GHG Project involved a review of how our respective standards covered GHG emissions, a review of recent research by RESOLVE and others to understand GHG emissions data collection and reporting in the mining sector, and circulation of a detailed survey to our company members. Our 47-question survey focused on GHG emissions measurement, disclosure and reporting, and target-setting.

We received 17 survey responses from experts from 16 different mining organizations. The survey results broadly reinforced the findings of our standards review, demonstrating that the allocation of emissions to co-products is a common practice. It also displayed promising attitudes from companies towards developing their GHG emissions practices, for example, working towards the inclusion of scope 3 emissions in measurement, disclosure, and reporting, and a willingness to have emissions data held on a public database. Other key lessons learned are summarized in the table below.

### **Lessons Learned: GHG Project**

1. The impact of Standards could be amplified by setting requirements for common units of disclosure. The formatting, disclosure, and reporting of emissions data is central to the transfer of emissions data between points in the supply chain.
2. There are a range of approaches to carbon offsetting and emissions data accounting. Standards can align by requiring disclosure of GHG emissions data accounting methodologies including for carbon offsets inclusion and quantification, approaches to the allocation of emissions to co-products, and use of carbon capture utilization and storage (CCU/S).
3. Corporate level reporting is common practice and mine-site level reporting is widespread but less common. Standards should seek to include requirements for disclosure and reporting of both absolute and emissions intensities at both corporate and mine-site levels for at least scope 1 and 2 emissions.
4. There is growing demand for scope 3 emissions data; Standards should consider including requirements for measurement of scope 3 emissions,

extending requirements on scope 3 emissions target setting to both the mine site and corporate levels, and harmonize frameworks and terminology.

5. Requirements for third-party verification of GHG emissions data can improve quality and veracity of data. The results of our survey of member companies suggest that including requirements for third-party verification is a viable option.
6. Further research is needed on multiple topics, including:
  - a. Determining which scope 3 emissions are most important to different supply chains and to identify and propose resolutions to the challenges of including scope 3 emissions in disclosure and reporting.
  - b. The allocation of GHG emissions to co-products is a complex area where further research could benefit the harmonization of practices towards interoperability.
  - c. Technologies and methods for handling GHG disclosures in supply chains and the specific applications to mining, minerals, and metals supply chain.

## Due Diligence Project

This research project explored how Voluntary Sustainability Initiatives (VSIs) for the mining sector can be used to demonstrate that companies have appropriate due diligence systems and processes in place, to ensure that due diligence has been carried out, and to verify due diligence. While VSIs and related verification processes are not a substitute for rule of law and the role of government in establishing requirements and oversight, they can serve as a complementary tool for due diligence.

The research resulted in a paper that explored inconsistencies in approaches to due diligence for the mining sector and discussed advantages and challenges related to alignment with Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).



## **Due Diligence Project: Lessons Learned**

1. The term “due diligence” is often misunderstood. VSIs play a role in clarifying this term, broadening the scope of due diligence to a wider range of environmental and social factors and greater geographic coverage, and enhancing verification and transparency of information.
2. OECD due diligence guidance is widely considered to be an international good practice for identifying and addressing risks.
3. VSI alignment with OECD due diligence guidance has the potential to promote harmonization, enhance credibility, and increase use of standards to demonstrate due diligence practices.
4. The OECD alignment process is a costly and complex process. This serves as an obstacle for VSIs who may otherwise seek OECD alignment and related benefits, such as recognition under EU legislation, cross-recognition with other standards, and the increased trust of a range of stakeholders.
5. OECD due diligence guidance focuses on sourcing from CAHRAs, thus the obligation to carry out due diligence would be limited geographically to CAHRAs only. As OECD guidance becomes more accepted globally, the limited scope creates difficulties as expectations to apply it outside CAHRAs increase.
6. The scope of the due diligence regime under the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs is limited. The scope could be expanded to be consistent with widely recognized international standards on the corporate responsibility to respect human rights and the environment. Development of the OECD Tool on Environmental Due Diligence in Mineral Supply Chains is underway, presenting a promising opportunity to begin to expand the coverage of due diligence to include a broader scope of issues.
7. VSI schemes that are partially aligned to the OECD Five-Step Framework do not always require an independent third-party audit to assess conformance with the standard. In some cases, a self-assessment is the assurance process used to evaluate conformance with the standards and therefore due diligence. Self-assessments alone risk introducing bias into the evaluation and lack credibility with stakeholders and rights holders. Independent third-party audits are the most credible form of assessment.

## **Next Steps**

The M3 Partnership has benefited from engagement and collaboration spanning multiple years. This collaboration has strengthened our resilience in the face of the COVID-19 pandemic and other major challenges, including responding to implications of Russia’s invasion of Ukraine.

Experience developing the IAP Tool, conducting pilots, and implementing projects focused on critical issues including GHG emissions data and reporting and approaches to due diligence have informed and strengthened our respective standards and collective efforts. The companies engaged in the pilots are enthusiastic about ongoing collaboration to improve the IAP tool.

We will continue working with companies and across sectors to improve the IAP Tool and to explore the potential for more integrated, efficient, and effective audit and reporting processes. We plan to expand the IAP tool over time to include additional standards. Learn more and follow our progress at the [\(M3 Partnership\)](#) website.