



**CURRENT RISK READINESS ASSESSMENT  
ISSUE AREAS AND INDUSTRY NORMS**

**VS**

**DRAFT RISK READINESS ASSESSMENT  
TOPICS AND CRITERIA**

April 2022

## Major changes

The application of the current RRA methodology results in a list of “industry norms” rather than a standard for responsible business. Major changes in this updated draft are:

1. Alignment with major international frameworks, specifically the United Nations Guiding Principles and the Paris Agreement.
2. Re-focus of criteria to define and result in the desired **outcome**.
3. Definition of cross-cutting expectations such as management systems, risk assessment, stakeholder engagement, and public reporting.
4. Dedicated criteria on climate action, supported by and interlinked with, specific criteria on climate-related issues.
5. Coherent set of requirements, clearly highlighting the interlinkages between individual criteria.
6. Criteria categorized under environmental (E), social (S) or governance (G).

New or fundamentally changed criteria include:

- Management Systems
- Impact Assessments
- Revenue Transparency
- Responsible Supply Chains
- Climate Action
- Diversity and Equality and Inclusion
- Employment Terms
- Emergency Preparedness
- Material Stewardship

CURRENT NORMS 2019		DRAFT CRITERIA 2022	
NO EQUIVALENT		GOVERNANCE	
ISSUE AREA	INDUSTRY NORM	TOPIC	CRITERIA
<b>Environmental Risk Management</b>	To implement an environmental management system (EMS) functionally equivalent to an internationally recognized EMS standard (e.g. ISO 14001).	<b>Management Systems</b>	Enable efficient environmental, social and governance management through the implementation and reporting on the performance of corporate or site-level management systems that are comprehensive, integrated, proportional to Sites' size and complexity, and in line with internationally recognized frameworks.
<b>Human Rights</b>	To implement the UN Guiding Principles on Business and Human Rights including human rights due diligence.		
<b>No equivalent</b>		<b>Impact Assessments</b>	Enable informed environmental, social and governance decision making through the implementation and disclosure of the results of impact assessments that are comprehensive, integrated, iterative, proportional to Sites' size and complexity, and in line with internationally recognized frameworks.
<b>Business Integrity</b>	To implement a management system that prohibits and effectively prevents bribery (including facilitation payments), corruption and anti-competitive behavior.	<b>Business Integrity</b>	Ensure risks of corruption are minimized through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent and remedy; and</li> </ul>

			<ul style="list-style-type: none"> <li>public disclosure of performance on the mitigation of potential and actual adverse impacts of bribery, money laundering, and anti-competitive behavior.</li> </ul>
<b>Legal Compliance</b>	To implement a management system that ensures compliance with all national legal requirements, including national obligations under international law.	<b>Legal Compliance</b>	Ensure high standards of business conduct through compliance with all applicable national regulatory requirements and all obligations under international law.
<b>Transparency and Disclosure</b>	Report annually on environmental, social and governance performance in line with internationally recognized standards (e.g. GRI) and to publicly support the implementation of EITI, and report where appropriate.	<b>Revenue Transparency</b>	Contribute to greater corporate transparency and accountability through the public disclosure of all material payments to governments of taxes, royalties, signature bonuses, and all other forms of payments or benefits.
		<b>Sustainability Reporting</b>	Enable corporate transparency and accountability and promote informed decision-making through the publication of annual reports on environmental, social and governance performance.
<b>Employee Grievance Mechanism</b>	To establish and implement a grievance mechanism accessible to all employees.	<b>Grievance Mechanism</b>	Respect the rights of adversely affected stakeholders' access to remedy, through the implementation of an effective grievance mechanism.
<b>Stakeholder Engagement</b>	To carry out stakeholder mapping, and to implement an engagement plan, and to establish a grievance mechanism.	<b>Stakeholder Engagement</b>	Enable affected stakeholders' early and continued participation in decisions through the:

			<ul style="list-style-type: none"> <li>• identification of the risks of adverse impacts on stakeholders across all operational activities;</li> <li>• implementation of a system to manage stakeholder engagement; and,</li> <li>• public disclosure of adverse impacts from operational activities on stakeholders and the measures taken for their mitigation.</li> </ul>
<b>Mine Closure and Reclamation</b>	To have a documented plan with stakeholder inputs that addresses environmental and social aspects and makes financial provisions for closure and reclamation of the site / facility.	<b>Mine Closure &amp; Reclamation</b>	<p>Ensure the long-term environmental, social, and economic stability of mining communities through the:</p> <ul style="list-style-type: none"> <li>• identification of risks and opportunities;</li> <li>• implementation of an integrated, comprehensive, and progressive plan to manage; and,</li> <li>• public disclosure of performance on the mitigation of adverse impacts and benefits from mine closure and reclamation.</li> </ul>
<b>Due Diligence in Mineral Supply Chains</b>	To implement the OECD Due Diligence Guidance on Conflict-Affected and High-Risk Areas	<b>Responsible Supply Chains</b>	Respect regulatory requirements and promote responsible business conduct in supply chains through the implementation

<b>Business Relationships</b>	To promote responsible business practices with significant business partners, including suppliers		of corporate or site-level, comprehensive, integrated, iterative, and risk-based due diligence.
<b>No equivalent</b>		<b>Climate Action</b>	Contribute to the goals of the Paris Agreement to curb global temperature rising to 1.5 °C above pre-industrial levels through the implementation of a corporate or site-level, comprehensive, integrated climate change mitigation and adaptation strategy.
<b>NO EQUIVALENT</b>		<b>SOCIAL</b>	
ISSUE AREA	INDUSTRY NORM	TOPIC	CRITERIA
<b>Child Labor</b>	To implement a management system that prevents the employment of children under the age of 15, prevents the worst forms of child labor, and prevents the exposure of employees under the age of 18 to hazardous work in line with ILO Conventions No. 138 and No. 182.	<b>Child Labor</b>	Respect children’s rights through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent and remedy; and</li> <li>• public disclosure of performance of the mitigation of potential and actual adverse impacts of the employment of children under the age of 15 and the exposure of workers under the age of 18 to hazardous work.</li> </ul>
<b>Forced Labor</b>	To implement a management system that prevents the use of any forms of forced labor and participation in acts of human trafficking in line with ILO Conventions No. 29 and No. 105.	<b>Forced Labor</b>	Respect workers’ rights to voluntary and freely chosen employment through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent and remedy; and</li> </ul>

			<ul style="list-style-type: none"> <li>public disclosure of performance on the mitigation of potential and actual adverse impacts of any form of forced labor.</li> </ul>
<b>Freedom of Association and Collective Bargaining</b>	To respect employees' rights to freedom of association and to collective bargaining in line with ILO Conventions No. 87 and No. 98, participate in collective bargaining processes in good faith and not obstruct alternative means of association where there are legal restrictions.	<b>Freedom of Association and Collective Bargaining</b>	Respect workers' rights to freedom of association and to collective bargaining in good faith, through: <ul style="list-style-type: none"> <li>identification of risks,</li> <li>implementation of a system to prohibit, effectively prevent and remedy; and</li> <li>public disclosure of performance to mitigate any adverse impacts to freedom of association and collective bargaining.</li> </ul>
<b>Discrimination and Harassment</b>	To prevent and address all forms of harassment and discrimination in the workplace in line with ILO Conventions No. 100 and No. 111.	<b>Non-Discrimination and Harassment</b>	Respect workers' rights to equality of opportunity and treatment through the: <ul style="list-style-type: none"> <li>identification of risks,</li> <li>implementation of a system to prohibit, effectively prevent and remedy; and</li> <li>public disclosure of performance to mitigate all forms of discrimination and harassment at the workplace.</li> </ul>
<b>Gender Equality</b>	To continually assess and monitor progress to ensure the implementation of a policy on gender equality in the workplace	<b>Diversity and Equality and Inclusion</b>	Promote diversity, equality and inclusion in the workplace through the: <ul style="list-style-type: none"> <li>identification of gaps and assessment of needs;</li> <li>implementation of a system to manage, monitor, and create a conducive culture for; and,</li> <li>disclosure of progress to achieve diversity, equality and inclusion in the workplace.</li> </ul>

<b>Working Hours</b>	To keep employees' total regular and overtime working hours to 60 hours per week unless defined otherwise by applicable law or a collective bargaining agreement; and to ensure overtime is voluntary, provide one rest day in seven; and, provide annual leave.	<b>Employment Terms</b>	Respect workers' rights to fair and decent employment terms through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to manage; and,</li> <li>• public disclosure of performance to maintain and monitor fair working hours, remuneration, social benefits, disciplinary actions, accommodation, and worker contracts.</li> </ul>
<b>Remuneration</b>	To pay wages that equal or exceed the national minimum wage, the appropriate industry wage (if higher), or a living wage.	<b>Occupational Health &amp; Safety</b>	Respect workers' rights to the means and conditions for safe and healthy work through the: <ul style="list-style-type: none"> <li>• identification of risks and assessment of needs;</li> <li>• implementation of a system to manage; and,</li> <li>• public disclosure of performance on actions to provide safe and healthy work environments, equipment, materials, and the terms and resources to support workers' wellbeing.</li> </ul>
<b>Occupational Health and Safety</b>	To implement an occupational health and safety management system that is in line with internationally accepted best practice frameworks (e.g. OHSAS 18001 or ISO 45001).	<b>Emergency Preparedness</b>	Enable workers and stakeholders to keep themselves and others safe in the event of an emergency through the: <ul style="list-style-type: none"> <li>• identification of potential emergency scenarios;</li> </ul>
<p style="text-align: center;"><b>No equivalent</b></p>			

			<ul style="list-style-type: none"> <li>• implementation of a system to manage; and,</li> <li>• disclosure of the performance of emergency response plans.</li> </ul>
<b>Community Health and Safety</b>	To implement a management system to monitor, avoid, minimize, reduce and compensate for adverse impacts on community health and safety.	<b>Community Health &amp; Safety</b>	<p>Respect communities' rights to healthy and safe living conditions through the:</p> <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent and remedy; and</li> <li>• public disclosure of performance on the mitigation of potential and actual adverse impacts on community health and safety.</li> </ul>
<b>Community Development</b>	To identify community needs in consultation with affected communities, develop a plan, and commit resources to support community development.	<b>Community Development</b>	<p>Contribute to the economic and social development of affected communities through the:</p> <ul style="list-style-type: none"> <li>• identification of;</li> <li>• contribution to meet community needs; and,</li> <li>• public disclosure of progress to promote community development.</li> </ul>
<b>Artisanal &amp; Small-Scale Mining</b>	To engage artisanal and small-scale miners (ASM) and facilitate their formalization and improvement of their environmental and social practices, where there are known to be legitimate ASM in the sphere of influence of the site / facility.	<b>Artisanal &amp; Small-Scale Mining</b>	<p>Respect the human rights and contribute to the professionalization of artisanal and small-scale mining operations (ASM) that affect or are affected by operational activities through the:</p> <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• assessment of opportunities; and,</li> <li>• implementation of a system to avoid and manage adverse impacts on and</li> </ul>

			conflict with ASM, and to contribute to improvement of ASM where it is safe, and legally and legitimately possible.
<b>Security and Human Rights</b>	To implement the Voluntary Principles on Security and Human Rights (VP on SHR) when engaging with private or public security forces.	<b>Security &amp; Human Rights</b>	Ensure the minimization of security-related impacts on affected stakeholders through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent and remedy; and</li> <li>• public disclosure of performance to mitigate security-related adverse impacts associated with the actions of private and public security forces.</li> </ul>
<b>Indigenous Peoples' Rights</b>	To implement a management system to respect the rights of Indigenous Peoples, including FPIC; avoid adverse impacts on Indigenous Peoples' lands, livelihoods, resources, and cultural heritage; and develop and implement an Indigenous Peoples' engagement plan.	<b>Indigenous Peoples' Rights</b>	Respect Indigenous Peoples' rights, including the right to grant free, prior, and informed consent, through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent, and remedy; and</li> <li>• public disclosure of performance on mitigation of potential and actual adverse impacts on Indigenous Peoples' livelihoods, territories, resources, and cultural heritage.</li> </ul>
<b>Land Acquisition and Resettlement</b>	Where land acquisition or resettlement is necessary: to implement a policy to explore all viable alternative project designs to avoid and/or minimize land acquisition and physical or economic displacement and to implement a resettlement action plan to fairly address	<b>Land Acquisition &amp; Resettlement</b>	Respect the rights of stakeholders affected by physical and economic displacement through the: <ul style="list-style-type: none"> <li>• identification of risks,</li> <li>• implementation of a system to avoid, minimize and remedy; and</li> <li>• public disclosure of performance on mitigation of potential and actual</li> </ul>

	and compensate for residual adverse impacts.		adverse impacts associated with land acquisition and resettlement.
<b>Cultural Heritage</b>	To identify cultural heritage sites and to establish a process based on consultation with stakeholders to avoid, minimize, reduce and compensate for adverse impacts on cultural heritage.	<b>Cultural Heritage</b>	Respect the cultural rights of affected stakeholders through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to prohibit, effectively prevent, and remedy; and</li> <li>• public disclosure of performance on mitigation of potential and actual adverse impacts on and associated with the access to cultural heritage.</li> </ul>
<b>NO EQUIVALENT</b>		<b>ENVIRONMENT</b>	
<b>ISSUE AREA</b>	<b>INDUSTRY NORM</b>	<b>TOPIC</b>	<b>CRITERIA</b>
<b>Greenhouse Gas (GHG) Emissions</b>	To quantify, establish reduction targets for and disclose CO2 equivalent emissions in line with established international reporting protocols (e.g. IPCC or GHG Protocol).	<b>Greenhouse Gas Emissions' Reductions</b>	Avoid, minimize, and compensate for scopes 1, 2, and 3 greenhouse gas (GHG) emissions through the: <ul style="list-style-type: none"> <li>• identification and quantification,</li> <li>• implementation of a system to manage, and,</li> <li>• public disclosure of progress to meet science-based targets for GHG energy use and emissions reductions in line with the goals of the Paris Agreement and internationally recognized frameworks.</li> </ul>
<b>Energy Consumption</b>	To implement and quantify energy efficiency improvements and increased use of renewable energy to reduce total energy consumption and/or energy intensity		
<b>Freshwater Management and Conservation</b>	To conduct a comprehensive assessment of water-use impacts and risks in collaboration with relevant stakeholders and to implement measures to ensure that water consumption does not restrict	<b>Water Stewardship</b>	Avoid, minimize, rectify, and compensate for adverse impacts on water balance, flow, quality, and access and needs of other water users and wildlife from operational activities through the: <ul style="list-style-type: none"> <li>• identification of risks,</li> </ul>

	availability/access for other water users or reduce the range and populations of fauna and flora in the catchment area of the site / facility.		<ul style="list-style-type: none"> <li>• implementation of a system to manage; and,</li> <li>• public disclosure of performance of improvements to and maintenance of water-use efficiency; water reduction, reuse, and recycling; water quality; and, water consumption reduction targets in all operational activities.</li> </ul>
<b>Waste Management</b>	To implement a risk-based waste management system that includes a commitment to the 'waste hierarchy' and is applicable to all waste types (hazardous, non-hazardous and inert).	<b>Waste Management</b>	Avoid, minimize and recover waste through the: <ul style="list-style-type: none"> <li>• identification of waste streams,</li> <li>• implementation of a system to manage, and</li> <li>• public disclosure of progress to meet targets on waste management.</li> </ul>
<b>No equivalent</b>		<b>Material Stewardship</b>	Promote resource efficiency, collection and recycling of materials at Sites and in the value chain through the: <ul style="list-style-type: none"> <li>• identification of adverse impacts;</li> <li>• implementation of a system to manage; and</li> <li>• public disclosure of progress to meet targets to minimize scrap, and increase the recovery, re-use, and recycling of materials.</li> </ul>
<b>Tailings Management</b>	To design, operate, monitor and close tailings impoundments while minimizing adverse impacts to the human health and the environment in line with internationally recognized standards.	<b>Tailings Management</b>	Avoid, minimize, rectify, and compensate for adverse impacts from tailings through the: <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to manage; and,</li> </ul>

			<ul style="list-style-type: none"> <li>• public disclosure of performance on the mitigation of the potential and actual adverse impacts from tailings facilities and tailings disposal systems.</li> </ul>
<b>Biodiversity and Protected Areas</b>	To implement the mitigation hierarchy to avoid, minimize, reduce and compensate for adverse impacts on biodiversity; to avoid adverse impacts to Critical Habitats or Endangered Species; and to prevent operational activities in World Heritage sites or in designated protected areas unless specifically and legally permitted.	<b>Biodiversity and Land Management</b>	<p>Avoid, minimize, restore or replace, and compensate for adverse impacts on biodiversity and productive land from operational activities, respect the integrity of protected areas, and commit to a no net loss and consider a net gain of biodiversity through the:</p> <ul style="list-style-type: none"> <li>• identification of risks;</li> <li>• implementation of a system to manage; and,</li> <li>• public disclosure of performance on mitigation of adverse impacts on biodiversity and productive land.</li> </ul>
<b>Pollution</b>	To implement the mitigation hierarchy to avoid, minimize, reduce and compensate for the adverse impacts of pollution on human health and the environment.	<b>Pollution</b>	<p>Avoid, minimize, rectify, and compensate for adverse impacts on human health and the environment from pollution through the:</p> <ul style="list-style-type: none"> <li>• identification of risks,</li> <li>• implementation of a system to manage; and, public disclosure of performance on the mitigation of adverse impacts from the introduction of poisonous and harmful substances to air, land, and water and from noise, light, and visual pollution.</li> </ul>