



RESPONSIBLY  
PRODUCED  
COPPER

# Public Consultation Summary Report

## The Copper Mark Chain of Custody Standard

December 2021 – February 2022

## 1 Overview

The Copper Mark published its draft **Chain of Custody Standard** for consultation from 22 December 2021 through 28 February 2022. The Standard is complementary to but not a replacement for an assessment of the Copper Mark Criteria, available to mines, smelters, refiners, and semis-fabricators (currently in pilot).

The Chain of Custody Standard's core objectives are to:

- Increase transparency in copper supply chains.
- Allow customers to be confident that their copper was produced responsibly.
- To track a copper product throughout the supply chain.
- Contribute to the uptake of responsible production practices and in particular use of the Copper Mark Responsible Production Criteria (Copper Mark Criteria) and Assessment Process.
- Contribute to the increased use of recycled material and support efforts to move to a circular economy.
- Allow product-level claims of Copper Mark copper.

Thank you to everyone who provided feedback. Your comments have been logged and will be reviewed to inform the revision of the Chain of Custody Standard. If necessary, the Copper Mark will hold a second public consultation for any unresolved issues.

## 2 Purpose

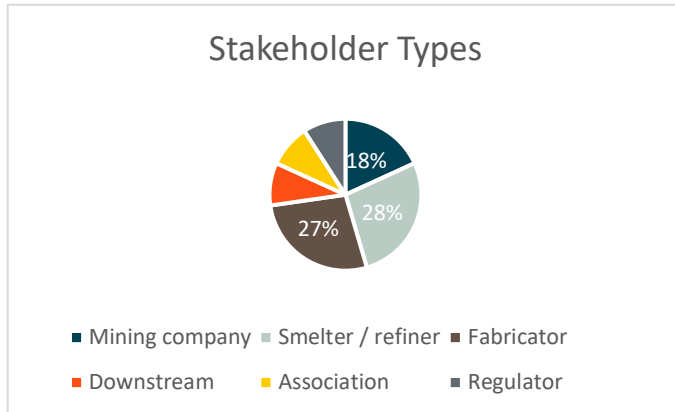
The objective of the consultation was to ensure the Standard is practical and achievable for companies along the copper value chain.

The consultation was intended to gather stakeholder's perspectives on all aspects of the Chain of Custody Standard. The feedback form included specific questions related to Section 7.2.2. Eligibility of Secondary Copper:

- Are the definitions of "point of origin" for different types of secondary materials reasonable?
- Are the due diligence requirements defined in Section 7.2.2 reasonable for different types of secondary materials, considering the complexities of the supply chain?

This document summarizes the process and comments received.

## 4 Stakeholders



Feedback was received from 11 organizations representing the following categories of stakeholders: mining company (18%), smelter / refiner (28%), fabricator (27%), Downstream (9%), Association (9%) and Regulator (9%). It is noted that civil society did not comment on the draft, which is normal for this type of standard.

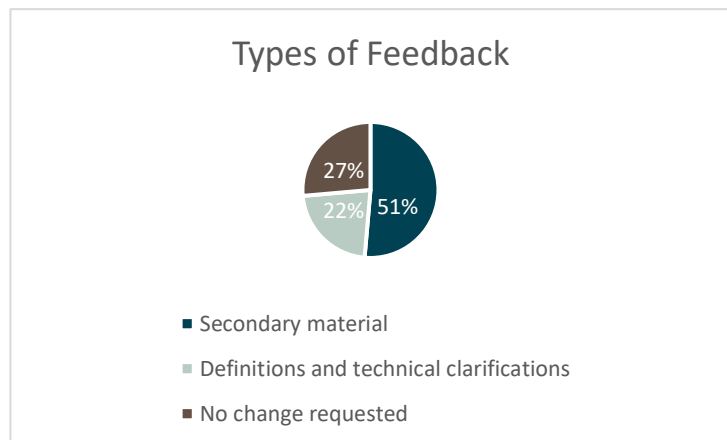
Stakeholders participating in the consultation came from companies headquartered in Australia, Europe, and

North America, with informal input provided by companies from Asia and Latin America as well. Most of these organizations operate globally.

## 5 Summary of Comments

72 formal comments were received during the consultation period. Most comments received covered the following concerns:

- The draft standard’s requirements for due diligence on secondary supply chains are too restrictive, not feasible, and risk disincentivizing progress on circularity and recycled content
- Definitions and technical clarifications
- Confirmation of understanding, without a request for change specified



## 6 Adoption and Next Steps

The comments received was reviewed and discussed with the Technical Working Group developing the Standard. Feedback was incorporated in the Standard revision with a focus on aligning the requirements for due diligence on secondary material supply chains with the other Copper Mark standards. Addressing these comments and an additional 9 provides for a total of 46 or 64% of the total comments that were accepted.

In particular, it was agreed that the Chain of Custody standard is not the right tool to address environmental, social, and governance issues within the secondary material

supply chain. It was also agreed that the Chain of Custody standard is meant to connect sites who have completed an assessment against other Copper Mark standards. As a result, the revised version aligns the requirements for due diligence on secondary material supply chains to those of the [Copper Mark Criteria for Responsible Production](#), criterion 31: Due Diligence on Mineral Supply Chains and the [Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc](#).

Of the suggestions received related to definitions and technical clarifications, 50% were adopted. No changes were made where there was a request for confirmation of understanding.

The revised Standard will be shared for a limited consultation among the Technical Working Group, Copper Mark partners, the IWCC and CDA throughout April and the first half of May 2022.