



Stakeholder engagement and summary feedback from the first public consultation on the revision of the Risk Readiness Assessment (RRA)

The Responsible Minerals Initiative (RMI) and the Copper Mark are revising the Risk Readiness Assessment (RRA) Criteria and corresponding Criteria Guide in 2021 / 2022.

A first public consultation on the revised draft of the RRA ran from 2nd May 2022 to 1st July 2022. The RMI and Copper Mark posted the draft RRA Criteria and Criteria Guide on their respective websites in English, Spanish and Chinese and both organizations ran communication campaigns to alert their stakeholders to the existence of the revised draft, to let them know how they could learn more about the contents of the draft, and to encourage feedback. The two organizations also developed a user-friendly Google Form (in English and in Spanish) to facilitate the provision of feedback, however stakeholders were not required to use the form in order to provide feedback.

Stakeholder engagement

Stakeholder workshops

Between 11 May and 17 June, RMI and the Copper Mark co-hosted six public workshops with the aim of introducing interested stakeholders to the revised draft of the RRA and to receive feedback on the proposed revisions. The workshops (five virtual, one hybrid) were held at contrasting times so as to cover the American, European and Asian time zones. All workshops were held in English, however two had simultaneous English/Spanish interpretation and one had simultaneous English/Chinese interpretation. Nearly 200 people participated across the six workshops.

Stakeholder 1-on-1 briefings

Copper Mark staff held 17 1-on-1 briefings on the revised draft RRA for stakeholders who either requested a deep-dive on a particular Criterion, or who were unable to attend a workshop and wished to receive a broad overview of the revisions. Recipients of these briefings included eight Copper Mark participants, three metal associations and six NGOs.

In addition, RMI held six 1-on-1 briefings for investors and downstream companies and conducted monthly briefings for their entire membership during the months of April, May, June and July.

Feedback

Who provided feedback on the draft revised RRA?

RMI and the Copper Mark received 44 formal feedback submissions on the draft revised RRA from 35 separate organizations during the public consultation period.

The highest number of respondents came from the US and UK (10 responses each), followed by Germany (5) and then Canada and China (both with 4). While there were fewer respondents from Latin America than expected, over 50 stakeholders based in Latin America participated in the stakeholder workshops and a number of Latin America-based companies provided input via their industry associations.

32% of respondents self-identified as representing industry associations, 25% as representing companies, 18% NGOs and 18% selected 'Other'. Feedback was also provided by stakeholders representing international organizations, government, and academia.

Summary feedback

1. In most cases, stakeholders agreed with the intent of the Criteria. Downstream companies and investors endorsed the list of Criteria and noted the relevance of the tool to inform their assessment of ESG impacts in supply chains or investees.
2. Stakeholders expressed concern that the increased prescriptiveness of the revised draft would make its implementation more difficult and costly.
3. Stakeholders also expressed concern that the increased prescriptiveness of the revised Criteria would negatively impact the RRA's equivalency with other responsible production standards e.g. the International Council on Mining and Metals' Mining Principles and the Mining Association of Canada's Towards Sustainable Mining.
4. Stakeholders welcomed the increased focus on the UN Guiding Principles on Business and Human Rights and how the RMI and the Copper Mark had woven them across multiple Criteria in the revised draft. They noted, however, that the requirements within the Impact Assessments Criterion were unclear, that risk assessment and impact assessment were conflated and the concept of saliency was missing in the Criterion.
5. Stakeholders also praised the increased focus on the Paris Agreement and that the revised draft highlights that Sites have a responsibility towards climate adaptation, not just mitigation. They recommended, however, the revision of draft requirements on target setting, implementation and reporting around scope 3 emissions.
6. Stakeholders advised a revision of the language of the Criteria Guide to ensure applicability across different stages of the supply chain, commenting that the draft formulation appears very mining-focused.
7. Stakeholders expressed concern that disclosure requirements were unclear, in particular in terms of what metrics may be reported at a corporate level and what should be reported at the Site level.

8. The Criteria that received the most amount of feedback during the public consultation period were as follows:

- Greenhouse Gas Emissions' Reductions (24 comments)
- Climate Action (22 comments)
- Impact Assessments (19 comments)
- Responsible Supply Chains (19 Comments)
- Management Systems (16 comments)
- Sustainability Reporting (12 comments)
- Material Stewardship (12 comments)
- Biodiversity and Land Management (12 comments)
- Artisanal and Small-Scale Mining (11 comments)

Next Steps

RMI and Copper Mark staff have processed the feedback received and split it into three categories.

1. Substantial changes proposed

A substantial change is a change that alters the nature of a Criterion or its requirements, not the form.

2. Partially substantial changes proposed

A partially substantial change is a change that is primarily clarifying in nature, reduces excessive detail or makes minor additions i.e. it alters the form of the Criterion but not its nature.

3. Non-substantial changes proposed

A non-substantial change is one that changes neither the nature nor the form of the Criterion. Most of the changes in this category are editorial in nature.

RMI and Copper Mark staff have asked the joint RMI/Copper Mark [Technical Committee](#) to provide input on the feedback that falls into the first two categories - with the majority of their time to be spent on the substantial changes category. RMI and Copper Mark staff are addressing the proposed non-substantial changes themselves.

A second, shorter public consultation will take place at the end of 2022 in which stakeholders will be invited to provide further feedback on the newly revised draft that is currently under development.