The Copper Mark
Recognition Process

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1. Introduction

The Copper Mark Assurance Process "recognizes existing standards systems, reporting frameworks, and certifications in order to avoid redundancy and to promote the use of these initiatives." Section 3.6 of the Assurance Process explicitly allows for equivalency and add-on assessments where possible.

The Copper Mark commits to recognize equivalent Systems to achieve the following core objectives:

- Avoid redundancy of assurance and reporting initiatives for Sites.

- Encourage the use of existing Systems currently implemented by Sites.

- Ensure acceptance of the Copper Mark by metal exchanges, customers and investors.

- Position the Copper Mark as a leader in the sustainability standard space.

The Copper Mark Recognition Process is designed to:

- Ensure the integrity and credibility of the Copper Mark Assurance Process.

- Define the criteria, process and timelines for the Copper Mark to recognize Systems.

- Prioritize efforts by the Copper Mark to obtain recognition in order to efficiently allocate time and resources.

- Define the criteria, process and timelines for the Copper Mark to work towards obtaining recognition by initiatives identified as priorities.

- Define the decision-making process and ability for initiatives and Sites to appeal recognition decisions taken by the Copper Mark.

- Detail the practical steps taken to apply recognition in the Copper Mark Assurance Process.

2. Copper Mark Recognition of Other Systems

A core principle of The Copper Mark is to recognize as "equivalent" other sustainability systems, good practice frameworks and certifications where they are materially comparable in scope and intent to Copper Mark standards and Assurance Process. Sites may wish to claim that one or more of Copper Mark standard(s) criteria have already been independently assessed by a third-party through an equivalent system.

The Copper Mark reviews equivalency at two levels:

1. **Recognition of a System:** The Copper Mark reviews and recognizes a System as being equivalent. Systems are defined as having standards and assurance requirements. These may include sustainability systems, good practice frameworks, certifications, or externally assured management systems. A subset of the broadly used term "system" includes Voluntary Sustainability Standard (VSS) Systems, which are standards developed at local, national or international level by organizations from the public and private sectors on environmental and social improvements. Reviewed and recognized VSS Systems are added to the Equivalency Matrix. In contrast, an externally assured management system would not be listed on the Equivalency Matrix.

2. **Recognition of a Site's Claim of Equivalency:** During the Assurance Process, the Copper Mark reviews each site's claim of equivalence.

   For Participants in the Copper Mark, this is completed during Step 3.

   For sites assessed only against the Joint Due Diligence Standard, this is completed in Step 1.

Sites who wish to submit evidence of an independent assessment conducted for a System should reach out to the Copper Mark. In order to have the System considered, the site should request a review of the System according to the process described in section 2.1.

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> **Pro tips:** To reduce the scope of the independent third-party site assessment, sites should follow these steps before applying to use the Copper Mark Assurance Process:
>
> 1. Identify whether you have independent third-party assessments conducted at your site(s) and whether those assessments cover any of the Copper Mark Criteria or conformance criteria of the Joint Due Diligence Standard.
>
> 2. Consult the Equivalency Matrix or contact the Copper Mark to check if the System(s) for which your site has been independently assessed have already been reviewed for equivalency.
>
> 3. Where a System is not included, submit a request for review to the Copper Mark by March 31 or September 30 respectively, understanding that the review will take up to 3 months.
>
> 4. Where a System is not included or is not equivalent for all criteria of the Copper Mark standard(s), consider including an "add-on" to already-scheduled assessment. The Copper Mark will provide guidance to understand what elements must be reviewed in the "add-on" assessment. The site must ensure the assessor is approved or can be approved by the Copper Mark before the assessment is conducted.

2.1. Types of Systems

The Copper Mark recognizes three main categories of Systems for recognition:

- **Systems that cover the full set of the Copper Mark Criteria:** Systems that include a comprehensive standard covering environmental, social, and governance issues.

- **Single-issue Systems:** Systems that are explicitly mentioned in the Copper Mark standards and cover no more than 5 criteria (in the case of the Copper Mark Criteria for Responsible Production).

- **Due diligence / OECD-based Systems:** Systems that may be equivalent to the Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc / the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2.2. Recognition of a System

2.2.1. Application and timeline

Sites may request the Copper Mark to conduct a review for recognition of equivalency of a System by submitting a request to info@coppermark.org. Any stakeholder of the Copper Mark may also identify and propose Systems for review.

Supporting information should include:

- A copy of / link to the Standard to be reviewed.

- A copy of / link to the Assurance Process to be reviewed.

- A copy of / link to supporting documentation such as guidance materials, implementation procedures, etc.

- The name and information of the main point of contact at the Site and system owner.

The Copper Mark will review the proposed Systems to determine if it is relevant and material to the Copper Mark. To be included in the review, the System must:

- Apply to eligible sites.

- Be formally launched for implementation (note: Where a standard is undergoing revisions, the current version of the standard is applied until a revised version has been formally launched for implementation).

Priority will be assigned to Systems submitted by sites participating or preparing to participate in the Copper Mark as well as to Systems that are widely used by eligible sites at large.

Where significant resources are required to complete a review, the Copper Mark will present a recommendation to the Advisory Council for review and the Board of Directors for approval.

The Copper Mark accepts requests to conduct a review for recognition of equivalency at any time. Reviews are conducted twice per year, generally in Q2 and Q4. The Copper Mark may review a system off-cycle at its discretion.

The deadline to submit a request for review in Q2 is 31 March of each year. The deadline to submit a request for review in Q4 is 30 September of each year. The equivalency may be applied once it has been reviewed and accepted by the Copper Mark, even if the updated matrix has not yet been published. Participants should work directly with the Copper Mark to understand all potentially applicable systems before completing the Self-Assessment.

The Copper Mark will review the Equivalency Matrix for relevant changes to already reviewed Systems in the first quarter of every year.

2.2.2. Review process: Systems that cover the full spectrum of the Copper Mark Criteria

The Copper Mark recognizes a System as equivalent if **all** the elements defined in this section are in place. The equivalency of the elements is assessed using a third party and applying a consistent methodology.

1. Benchmarking of standard requirements

The Copper Mark will assess if the requirements in the System's standard is found to be materially comparable in scope and intent to the Copper Mark Criteria. This determination is made for each individual criterion separately. Recognition of one or some criteria does not imply recognition for all Copper Mark Criteria.

For each criterion, the Copper Mark will review the standard and related documentation such as guidance documents, report templates, and other supporting evidence to benchmark the requirement with the industry norm. The System's requirements will be rated for each criterion based on the terms used in the Equivalency Matrix as:

Equivalent: where the scope and intent (and therefore likely outcomes) of the requirements are the same, even if there are minor differences in the details of the requirements and/or the language used.

Not fully equivalent: where the scope and intent (and therefore the likely outcomes) of the requirement are not the same. Similarly, issues that could be considered within the scope of the VSS but which are not addressed in the VSS are not considered as equivalent to the industry norm.

Not applicable: requirements that are beyond the scope of the VSS because the VSS was not designed with those issues in mind, or those issues that are specific to a type of metal or type of production process not included in the scope of the VSS are considered not applicable.

2. Credible independent assessment or third-party certification

The Copper Mark will confirm that the System's assurance requirements are materially comparable in scope and intent to the Copper Mark Assurance Process.

This is done by reviewing the System using the ISEAL Sustainability Benchmarking Good Practice Guide, Annex 3, Benchmark Criteria for Evaluating Sustainability Standards which includes:

- Scheme management.
- Standard setting.
- Assurance.
- Personnel competence.
- Oversight.
- Claims and labels.

Schemes that are ISEAL Code Compliant are automatically recognized as equivalent for this portion of the review.

Specific to the ISEAL benchmarking criterion on "assurance," the review compares the following key elements from the Copper Mark Assurance Process to ensure the quality control is equal to or greater than those of the Copper Mark:

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- Scope of the assessments

- On-site and site-level assessments

- Performance determinations are based on a triangulation of evidence

- **Reasonable assurance** is used when ISAE3000 approach is applied

- Improvement plan requirements have the same or stricter timelines as defined in the Assurance Process

- Re-assessment requirements have the same or stricter timelines as defined in the Assurance Process

- Assessor selection, training and evaluation, and oversight are equal to or greater than those of the Assurance Process

- Assessments result in a report that can be shared with the Copper Mark

The Copper Mark will take reasonable efforts to seek feedback and clarification from the system owner as appropriate. The Copper Mark will also take reasonable efforts to work with the system owner to implement the assurance expectations within a defined period of time.

Where the standard is materially comparable to the Copper Mark Criteria but the assurance process is not materially comparable to the Copper Mark Assurance Process, a site may apply equivalence only if the equivalent standard is assessed using the Copper Mark Assurance Process.

2.2.1. Review Process:Single-issue Systems

Automatic recognition for systems that are specifically referenced within the criteria. This includes for example ISO 14001 and ISO 45001.

2.2.2. Review Process: Due Diligence / OECD-based Systems

For a System to be considered equivalent with the Joint Due Diligence Standard or criterion 31 of the Copper Mark Criteria, it must be independently verified as "fully aligned" with the OECD Due Diligence Guidance for both the standard and implementation in accordance with the Methodology for the Alignment Assessment of Industry Programmes with the OECD Minerals Guidance. As an overall conclusion, fully aligned is defined in the methodology as "(Section A = 100% of criteria 'Fully Aligned) + (Sections B and C = 80% or more of criteria 'Fully Aligned') + (no 'Not Aligned' criteria)."

The independent verification must use the OECD Alignment Assessment Tool and be conducted by an OECD-approved assessor.

2.3. Recognition of Sites' Claim of Equivalency

This section details how recognition of Systems is implemented in the Copper Mark Assurance Process. **Sites are expected to seek equivalency for Systems prior to their Independent Assessment (Step 3 of the Copper Mark Assurance Process) and in accordance with the timelines defined below.**

The Copper Mark will not extend deadlines for failure to submit a request for equivalency before the Independent Assessment.

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What is the Equivalency Matrix?

- The Equivalency Matrix is jointly created by the Copper Mark and the [Responsible Minerals Initiative](#) (RMI).

- The objective is to provide succinct information on the extent to which a Voluntary Standards Systems (VSS) meets some or all of the RRA industry norms based on a clear benchmarking methodology, and the extent to which the assurance process is materially comparable to the Copper Mark Assurance Process.

- The methodology used to conduct the standard benchmarking follows the [RMI's Recognition Process](#) for VSS.

- The Copper Mark recognizes a VSS as equivalent for the areas indicated, as long as appropriate evidence is provided (as outlined in this Recognition Process).

- For the RMI, the Equivalency Matrix indicates the results of the equivalency function within the RRA Online Platform.

- The Copper Mark may review additional systems that are not included in the Equivalency Matrix. Please contact the Copper Mark (info@coppermark.org) for a full list of reviewed systems or with

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2.3.1. Step 1: Commitment

It is recommended for sites to check whether independent assessments have been conducted at the site and whether those assessments cover any of the Copper Mark Criteria. For any independent assessments conducted, sites may check whether the System is included in the Equivalency Matrix.

- For Systems that are not included in the Equivalency Matrix: Submit a request to the Copper Mark for an equivalency review in accordance with Section 2.1.1. above.

- For Systems included in the Equivalency Matrix: Please refer to Step 2: Self-Assessment.

Sites assessed only against the Joint Due Diligence Standard will submit the list of equivalent systems, full assessment or certification reports, and improvement plans as applicable during this step.

2.3.2. Step 2: Self-Assessment – Participants Only

In accordance with section 3.4.2 of the Copper Mark Assurance Process: For criteria where the Participant intends to claim an equivalent certification or independently verified system, the Participant will indicate the name of the certification or system and provide evidence of verification (e.g., the certificate; the verification report; the continuous improvement plan). The evidence must include the following:

    a. Name of the independent verifier/certification body.

    b. Dates of the verification.

    c. Scope of the verification (operations; issue areas; criteria; etc.).

    d. Expiration of the certification; and,

    e. The results of the verification.

2.3.3. Step 3: Independent Assessment – Participants Only

All Copper Mark Criteria must be verified through a site assessment.

In accordance with section 3.2 of the Assurance Process, assessors are responsible for reviewing the reports submitted by the site and determining whether they meet the following requirements:

- The assurance or certificate is in effect or valid at the time of submission.

- The assurance or certificate is no more than 24 months old or plans for re-assessment or re-certification are underway and communicated to The Copper Mark.

- The assurance or certificate is valid for at least 12 additional months following submission or plans for reassessment or recertification are underway and communicated to The Copper Mark.

- The assurance or certificate covers the same scope as the site participating in The Copper Mark, including operations, locations, and materials.

- Improvement plans are in place to close any gaps within the next 12 months.

- Relevant issues identified in due diligence checks are covered in the report.

Based on the determination, assessors are responsible for determining which criteria are applicable in the assessment.

For equivalent systems that cover all criteria of Copper Mark standard and are recognized for both its standard and assurance, the participant shall submit the certification or assurance report instead of a self-assessment.

The Copper Mark will commission an approved assessor to conduct a review of the equivalent certification or assurance.

The commissioned assessor shall determine whether the equivalent certification or assurance was conducted in accordance with the Copper Mark Recognition Process including the points above and:

- The equivalent assurance process was followed
- All applicable criteria were including in the assessment

3. Recognition of the Copper Mark by VSS Systems

3.1. Prioritization

The Copper Mark will use the following criteria to prioritize the VSS systems from which to seek recognition:

- Recognition is required to ensure market access for Participants.

- The extent to which the VSS system is already used by Copper Mark current and / or potential Participants.

- The impact of the initiative on the Copper Mark's ability to achieve its vision and mission.

The Copper Mark will provide regular reports on potential initiatives to the Advisory Council. In order to determine which initiatives from which to seek recognition, the Advisory Council will review:

- The **name** of the VSS system

- The **objective** of the recognition

- The **priority level** based on the prioritization criteria

- The **scope** of the recognition (i.e., which of the Copper Mark Assurance Process criteria are in scope)

- The **requirements** set forth by the VSS system in order to seek recognition

If the Advisory Council recommends that the Copper Mark pursue recognition, staff will present the recommendation as well as proposed timelines and resources required for final approval by the Board of Directors.

3.2. Review Process

The Copper Mark may conduct an internal review or, as required by the VSS system, commission a third party to conduct a review of the Copper Mark Criteria and Assurance Process in comparison to the VSS system's requirements.

Where the review identifies gaps, the Copper Mark will engage the Advisory Council to determine whether to close the gaps, continue to seek recognition with the gaps acknowledged, or cease to seek recognition.

In the case where significant resources would be required to close the gap, the recommendation from the Advisory Council as well as proposed timelines and resources required will be presented for approval by the Board of Directors.

3.3. Ongoing Monitoring

Using the same process as described above, the Copper Mark will regularly and at least annually re-assess the value of recognition in current VSS systems and identify any additional VSS systems as appropriate. This process will include at a minimum:

- Assess the VSS against any Copper Mark Criteria revisions

- Assess the VSS based on any VSS revisions

- Take reasonable efforts to liaise with the system owner on outcome changes

- Communicate to stakeholders on any outcome changes and the justification for those changes

During the benchmarking of other initiatives, where the criterion exceeds the Copper Mark expectations, the Copper Mark will log opportunities for improvement for consideration in the next revision of the Copper Mark Assurance Process.

4. Glossary

Assessment	An evaluation of the performance of a site against The Copper Mark Criteria.
Assessor	An independent service provider or individual (third party) that is approved by The Copper Mark and contracted by a site to assess and verify conformance with The Copper Mark Criteria or Joint Due Diligence Standard at the site.
Assurance Process	The steps and actions required in The Copper Mark to obtain and consider evidence in order to enhance the degree of confidence regarding conformance with The Copper Mark standards.
Company	A legal entity formed by a group of individuals or companies to engage in and operate a business. For the purpose of this Standard, the term is used to indicate a business of any business and ownership structure including a partnership, proprietorship, or corporation, or co-operative. A company may engage in and operate one or multiple sites.
The Copper Mark	The trading name of the U.K incorporated not-for-profit company that owns and governs the trademark-protected certification mark and logo also known as "The Copper Mark."
The Copper Mark Criteria for Responsible	The Copper Mark uses the Risk Readiness Assessment (RRA) as the basis for evaluating Participants' performance against The Copper Mark Criteria. The RRA condenses over 50 international standards and guidelines into 32 issue areas covering environmental, social and

Production (Copper Mark Criteria)	governance aspects of mining, smelting and refining operations. For the full list of criteria, see the Criteria Guide.
The Copper Mark standards	The Copper Mark Criteria for Responsible Production (Copper Mark Criteria).).). The Copper Mark uses the Risk Read Assessment (RRA) of the Responsible Minerals Initiative (RMI) as the basis for evaluating Participants' performance, including the RRA-Copper Mark Criteria Guide of February 2020. AND The Copper Mark Chain of Custody Standard of July 2022 AND The Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of February 2021.
Equivalent	Where the scope and intent (and therefore likely outcomes) of the requirements are the same, even if there are minor differences in the details of the requirements and/or the language used.
Equivalent Systems	Systems are defined as having standards and assurance requirements. These may include sustainability systems, good practice frameworks, certifications, or externally assured management systems. A subset of the broadly used term "system" includes Voluntary Sustainability Standard (VSS) Systems, which are standards developed at local, national, or international level by organizations from the public and private sectors on environmental and social improvements.
Joint Due Diligence Standard for Copper, Lead, Nickel, and Zinc	The joint Due Diligence Standard for Copper, Lead, Nickel and Zinc (the Standard) was established by The Copper Mark, the International Lead Association (ILA), the Nickel Institute (NI), the International Zinc Association (IZA) and the Responsible Minerals Initiative (RMI) to enable responsible global supply chain management in the copper, lead, nickel and zinc industries. The Standard is available on The Copper Mark website here.
Other eligible sites	Any *company* extracting, producing and/or trading copper, lead, nickel, or zinc materials from mine sites, including producers of refined metal products, which are generally referred to as the refiner.

	The Joint Due Diligence Standard also applies to producers of nickel chemical compounds and all nickel raw intermediate materials (including ferro-nickel, nickel pig iron, and nickel oxide sinter) entering production of stainless steel, alloys, batteries, and plating, and where no refining takes place.
Participant	A site involved in the extraction, processing, treatment, mixing, recycling, handling, or otherwise manipulating one or more of the principle covered metal products. A Participant is a site assessed against all 32 Copper Mark Criteria. Only Participants are eligible to make Copper Mark Claims in accordance with The Copper Mark Claims Guide.
Performance Determination	Level of performance assigned to each risk area based on whether the site's practices 'does not meet', 'partially meets', or 'meets' The Copper Mark Criteria (see the Criteria Guide for further detail).
Principle Covered Metal Products	For the purpose of this standard, principle covered metal products contain or are made up of copper, nickel, molybdenum, or zinc mined ore, metals, chemicals, alloys or other materials. This includes products up to and including the point where the product is given a special shape, surface or design which determines its function to a greater degree than its chemical composition, and down to but not including the point where a complex object is manufactured.
Recognition	The acceptance of an external set of requirements, their implementation and their verification in lieu of the Copper Mark's own requirements.
Site	The definition of a site is based on activities, product, geographical scope, and management control. A site refers to an operation involved in the extraction, processing, treatment, mixing, recycling, handling, or otherwise manipulating one or more of the principle covered metal products. A site also refers to an operation involved in extracting, producing and/or trading copper, lead, nickel, or zinc materials from mine sites, including producers of refined metal products. This includes an operation involved in the production of nickel chemical compounds and all nickel raw intermediate materials (including ferro-nickel, nickel

	pig iron, and nickel oxide sinter) entering production of stainless steel, alloys, batteries, and plating, and where no refining takes place
	A site may comprise several activities in different locations in the same geographic area and under the same management control.
Systems	Systems are defined as having standards and assurance requirements. These may include sustainability systems, good practice frameworks, certifications, or externally assured management systems.
Voluntary Sustainability Standard (VSS)	Standards developed at local, national or international level by organizations from the public and private sectors on environmental and social improvements.