



Stakeholder engagement and summary feedback from the second 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 2021-2023.

A first public consultation on a revised draft of the RRA ran from 2nd May 2022 to 1st July 2022. The feedback received during the first public consultation and the subsequent input from the [Technical Committee](#) led to the development of a second draft of the RRA Criteria and Criteria Guide. The summary of the first consultation can be found [here](#).

A second public consultation on the revised draft of the RRA ran from 1st March to 1st April 2023. The RMI and Copper Mark posted the revised draft of the 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 Google Form to facilitate the provision of feedback.

Stakeholder engagement

Stakeholder workshops

Between 8 March and 16 March, RMI and the Copper Mark co-hosted four public workshops with the aim of informing interested stakeholders of the changes made since the first revised draft and to receive feedback on those changes. The workshops (all virtual) were held at different times so as to cover the American, European and Asian time zones. Three workshops were held in English and one was held in Spanish. Nearly 200 people participated across the four workshops.

Stakeholder 1-on-1 briefings

Copper Mark staff held two 1-on-1 briefings on the revised draft RRA for members of metal associations. In addition, RMI provided two briefings for its member companies and engaged with due diligence experts to elicit feedback on specific aspects of the Criteria Guide..

Feedback

Who provided feedback on the draft revised RRA?

RMI and the Copper Mark received 26 formal feedback submissions on the second draft of the RRA during the public consultation period, totaling 214 individual comments.

The highest number of respondents came from the US and UK (7 responses each), followed by Germany (3), Belgium (2) and Chile (2).

50% of respondents self-identified as representing companies, 30.8% as representing associations, 7.7% NGOs, 3.8% academia and 7.7% selected 'Other'.

Summary feedback

1. The majority of the comments were submitted in the open-ended questions section of the feedback form. There was limited participation in the structured questionnaire.
2. The majority of the changes undertaken in the revision process between the first and second drafts were recognized and appreciated.
3. The alignment with the OECD Due Diligence Guidance, the UNGPs and international conventions (human rights and environment) was welcomed.
4. The majority of comments received were aimed at very specific aspects/requirements within a chapter while endorsing the overall intent and formulation of the chapter.
5. The exceptions to the above were in the comments received on the following chapters:
 - a) Indigenous Peoples' Rights – Stakeholders suggested that the tone of this chapter could be construed as being patronizing and/or paternalistic. It was also suggested that the chapter could explicitly refer to some of the other rights that Indigenous Peoples have, in addition to that of Free, Prior and Informed Consent (FPIC).
 - b) Community Development – Stakeholders suggested that this chapter should have stronger requirements on local procurement.
 - c) Tailings Management – Stakeholders questioned whether a site that is not in scope of the Global Industry Standard on Tailings Management (GISTM) should still be able to meet this criterion.

These three chapters require significant attention in the coming months.

6. The Criteria that received the most amount of feedback during the second public consultation period were as follows:
 - Greenhouse Gas Emissions' Reductions (14 comments)
 - Management Systems (11 comments)
 - Sustainability Reporting (11 comments)
 - Climate Action (10 comments)
 - Risk Assessments (8 comments)
 - Revenue Transparency (8 comments)
 - Responsible Supply Chains (8 Comments)
 - Employment Terms (8 comments)

- Artisanal and Small-Scale Mining (8 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.

Publication of the final draft of the RRA Criteria and Criteria Guide is expected in October 2023.