



## **Summary Feedback from the Risk Readiness Assessment (RRA) Revision Public Consultations**

06 March 2024

This report is prepared by The Copper Mark. While the revision process for the Risk Readiness Assessment Criteria Guide was managed jointly by the Responsible Minerals Initiative and the Copper Mark, this report reflects the Copper Mark's own understanding of the process, feedback received and learnings.

## The RRA Revision Process

The Copper Mark and the Responsible Minerals Initiative (RMI) jointly revised the Risk Readiness Assessment (RRA) Criteria and corresponding Criteria Guide in 2021-2023.

The revision was aligned with the [Copper Mark Standard Setting Procedure](#) which requires not only that a summary of the feedback received be published, but also a summary of how each material issue was addressed.

The RRA Revision process is explained in detail in a slide deck that can be found [here](#).

## Public Consultations

The first public consultation on a revised draft of the RRA ran from 2<sup>nd</sup> May 2022 to 1<sup>st</sup> 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 1<sup>st</sup> March to 1<sup>st</sup> April 2023. The feedback received during the second public consultation and the subsequent input from the Technical Committee led to the final version of the RRA Criteria and Criteria Guide that was published on 19 October 2023. The summary of the second consultation can be found [here](#).

## The Technical Committee

### Purpose and membership

The Technical Committee's role was to support the revision process to ensure the RRA and Criteria Guide:

1. Covered all major environmental, social and governance issue areas.
2. Are recognized and accepted by key impacted stakeholder groups as reflecting core expectations for responsible mineral production practices.
3. Can be implemented by mineral producers and processors and their performance against the criteria can be assessed by independent third-party assessors.

### Participants

- 7 producer companies, from mining, smelting and refining operations across different metals and geographies
- 5 downstream companies from electronics, automotive and energy industries

- 7 non-industry representatives from academia, labour, assessor and other subject-matter experts

In providing input, the Technical Committee members acted in an advisory capacity and neither the individuals concerned, nor their respective organizations, have endorsed the standard.

## **Engagement**

The Technical Committee met 23 times over the course of the 2021-2023 revision period.

## **Stakeholder engagement**

### **Stakeholder workshops**

Across the two consultations, RMI and the Copper Mark co-hosted ten 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 (nine virtual, one hybrid) were held at different times so as to cover the American, European and Asian time zones. Two workshops had simultaneous English/Spanish interpretation, one was Spanish only, one had simultaneous English/Chinese interpretation and the remaining six were English only.

Nearly 400 people participated across the ten workshops.

### **Stakeholder 1-on-1 briefings**

Across the two consultations, Copper Mark staff held 19 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.

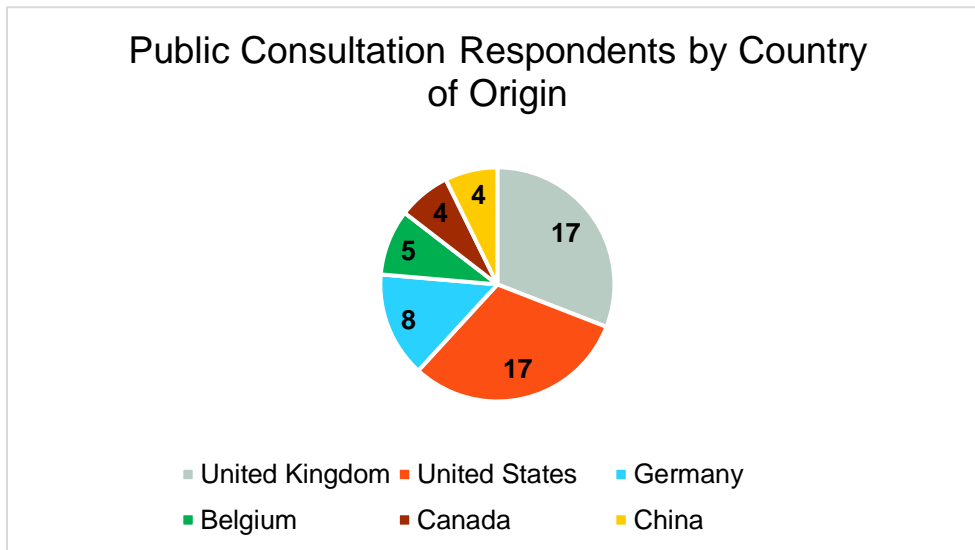
Recipients of these briefings included eight Copper Mark participants, three metal associations and six NGOs. In addition, RMI staff held six 1-on-1 briefings for investors and downstream companies and conducted six separate briefings for their entire membership.

RMI staff also engaged with due diligence experts to elicit feedback on specific aspects of the Criteria Guide.

## Feedback

Figure 1 represents the geographic representation of stakeholders that submitted feedback. Feedback was largely received from respondents located in Europe or North America.

Figure 1: Country of Origin of Respondents

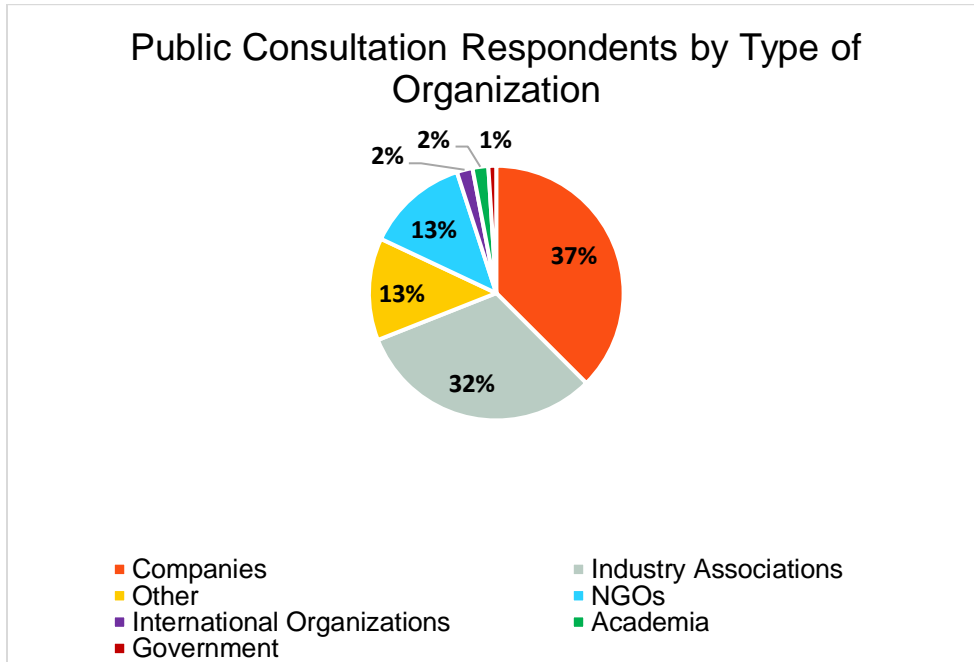


While there were fewer respondents from Latin America than expected, stakeholders based in Latin America participated in high numbers in the Spanish-speaking stakeholder workshops and some Latin America-based companies provided input via their industry associations.

Stakeholders in other regions such as Asia and Africa were underrepresented in the process.

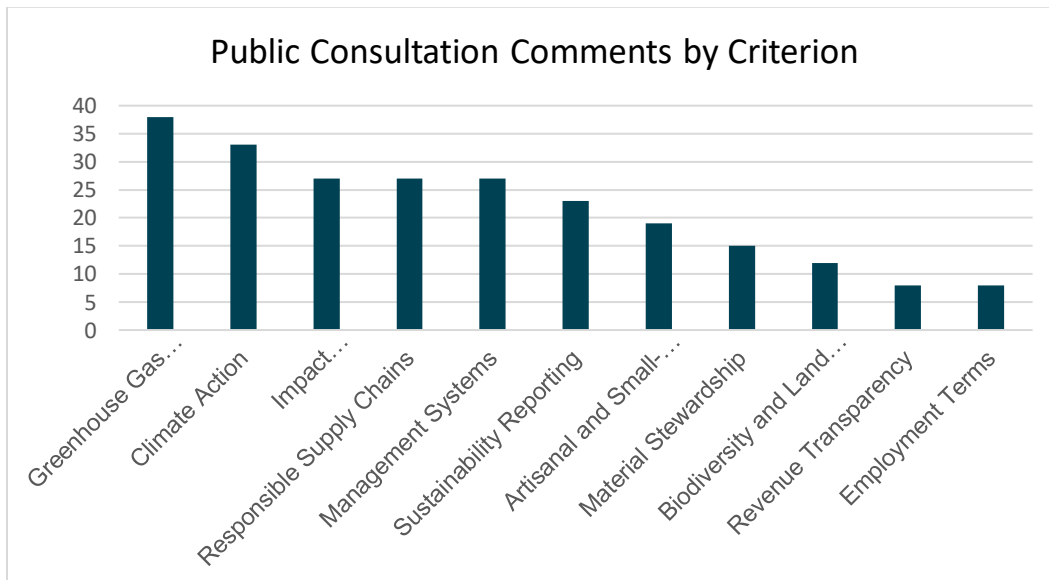
In regard to the type of organizations, the majority of feedback was received from companies – either directly or through their industry associations. Other stakeholders included NGOs, government, international organizations, academia and others.

Figure 2: Type of Organization of Respondents



Feedback received was spread across different areas of the RRA Criteria Guide, with more comments directed at the chapters that underwent more substantive revision. Figure 3 below shows the number of individual comments received per criterion.

Figure 3: Number of comments by criterion of the RRA Criteria Guide



## Substantive comments

Across the two consultations, the Copper Mark and RMI received 580 individual comments in 69 separate formal feedback submissions. More details on the nature of the feedback received can be found in the summaries of each public consultation [here](#) and [here](#). A high-level summary of the most substantive areas of feedback is included in Table 1 below.

*Table 1: Main Areas of Feedback*

<b>First consultation</b>	
<b>Comment</b>	<b>Response</b>
Stakeholders suggested that the requirements within the Impact Assessments Criterion were unclear, risk assessment and impact assessment were conflated, and the concept of saliency was missing in the Criterion.	The name of the Criterion was changed from Impact Assessments to Risk Assessments and, after further consultation, the chapter was broadly rewritten to clarify exactly what was required of the Site. The concept of saliency, first introduced in the Management Systems Criterion, was extended into the Risk Assessments Criterion.
Stakeholders suggested that the draft requirements on target setting, implementation and reporting around scope 3 emissions should be revised.	The requirement to use SBTi for target setting was removed and the requirement to disclose Scope 3 emissions was nuanced to require the disclosure of all 'relevant and material' categories of Scope 3 emissions. Prescriptiveness around reporting frameworks was removed. Detail on when offsets may be used was included. It was clarified that targets can be an expression of how a Site contributes to a corporate target.
Stakeholders suggested that the language of the Criteria Guide be revised to ensure applicability across different stages of the supply chain and that, generally, the draft appears very mining-focused.	Applicability of criteria for standalone metal processors and for downstream processors and manufacturers was clarified. In the criteria that remained applicable for those Sites, efforts were made to ensure that the language used in the guide was not too mining-centric.

<p>Stakeholders expressed concern that disclosure requirements were unclear, in particular in terms of what metrics should be reported at the Site level.</p>	<p>It was clarified that all reporting had to be in line with Criterion 6 on Sustainability Reporting and that formal sustainability reporting may be implemented at Site or corporate level; this reporting may include the reporting of salient issues, however, it was clarified that additional reporting of salient impacts to affected stakeholders must be implemented at Site level, in line with Criterion 8 on Stakeholder Engagement.</p>
<p><b>Second consultation</b></p>	
<p><b>Comment</b></p>	<p><b>Response</b></p>
<p>Stakeholders suggested that the tone of the chapter on Indigenous Peoples' Rights 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).</p>	<p>The Copper Mark and RMI engaged with Aboriginal and First Nations representatives, in Australia and Canada respectively, to ensure that the tone of the chapter was appropriate and that rights other than FPIC were explicitly referred to.</p>
<p>Stakeholders suggested that the Community Development chapter should have stronger requirements on local procurement.</p>	<p>The Copper Mark and RMI consulted with a local procurement expert to strengthen the requirements on local procurement, including the need to establish a procurement policy that includes the definition of local procurement; the establishment of internal procurement processes and responsibilities for the implementation of local procurement; and the establishment of a baseline to track progress on local procurement.</p>
<p>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 Criterion 31 on Tailings Management.</p>	<p>The Copper Mark and RMI adopted separate positions on the question of sites that are not in scope of the GISTM and so a line was added to the RRA Criteria Guide that states "Sites with tailings facilities and tailings disposal systems that are not in scope of the GISTM should contact either RMI or the Copper Mark for guidance."</p> <p>The Copper Mark guidance on this question can be found <a href="#">here</a>. RMI's guidance can be found <a href="#">here</a>.</p>

## Lessons learned

The main challenge encountered in the revision process was to engage with all types of impacted stakeholders and maintain their engagement over the two-year period of the revision. As a result:

There was limited engagement from stakeholders outside of Europe and North America. The Copper Mark conducted proactive outreach in Latin America during the first public consultation and thus, was able to obtain feedback through workshops or 1:1 outreach, this was not the case for other regions.

**Learning 1:** Proactive outreach is required to reach stakeholders outside of North America and Europe. This could include:

1. Prioritization of regions or countries that could be impacted by the standard, e.g. the top four largest copper producing countries e.g. Chile, Peru, Democratic Republic of Congo and China.
2. Development of a proactive outreach strategy, using different outreach models, beyond online consultation.
3. Assign resources to support a more proactive outreach strategy.

Secondly, the level of engagement dropped significantly from the first to the second public consultation:

- The number of feedback submissions almost halved from the first to the second consultation. Feedback from NGOs fell by 57%.
- There was limited engagement with the structured questionnaire in the second consultation which aimed to gather feedback on specific issues encountered by the Copper Mark and RMI in the 2nd draft.
- Attendance of Technical Committee members in calls also dropped off as the revision process progressed. The revision process extended over a two-year period, requiring a long-term commitment from stakeholders to remain engaged.

**Learning 2:** Sustained engagement throughout the process requires a clear value proposition for stakeholders and clarity on the revision process. This could include:

1. Equal levels of proactive effort employed for outreach in the first and second consultation.
2. Improved clarity at the beginning of the process on the level of engagement expected in the Technical Committee, combined with stronger incentives for individuals to participate.
3. Learnings from other standard-setting bodies on tools that have been used successfully to obtain feedback on specific issues in the standard draft.