

How to File a Complaint Related to IRMA

*The IRMA Issues Resolution
System Procedure*

September 2021

IRMA Community Toolkit

IRMA  Initiative for Responsible
Mining Assurance

About IRMA

- **IRMA is a coalition** of NGOs, affected communities, purchasers, investors, mining companies, and labor unions. Each sector has equal voice in IRMA governance.
- **IRMA is a high-bar standard to drive responsible mining**, defined through the *IRMA Standard for Responsible Mining*
- **IRMA is a global organization** managing IRMA standards and the system for independent third-party audits against those standards
- Learn more at <https://responsiblemining.net/>.

The IRMA Community Toolkit

This is one of multiple modules in the IRMA community toolkit created to help you better understand IRMA and how it can be utilized to serve directly impacted communities.

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Leave feedback, suggest new tools and materials, or request a presentation for your community at info@responsiblemining.net.

The IRMA Standard for Responsible Mining

Comprehensive coverage of mining issues in 26 chapters under four principles

Business Integrity

- Legal compliance
- Stakeholder engagement
- Stakeholder grievance mechanism
- Human rights due diligence
- Revenue transparency / anti-corruption

Planning for Positive Legacies

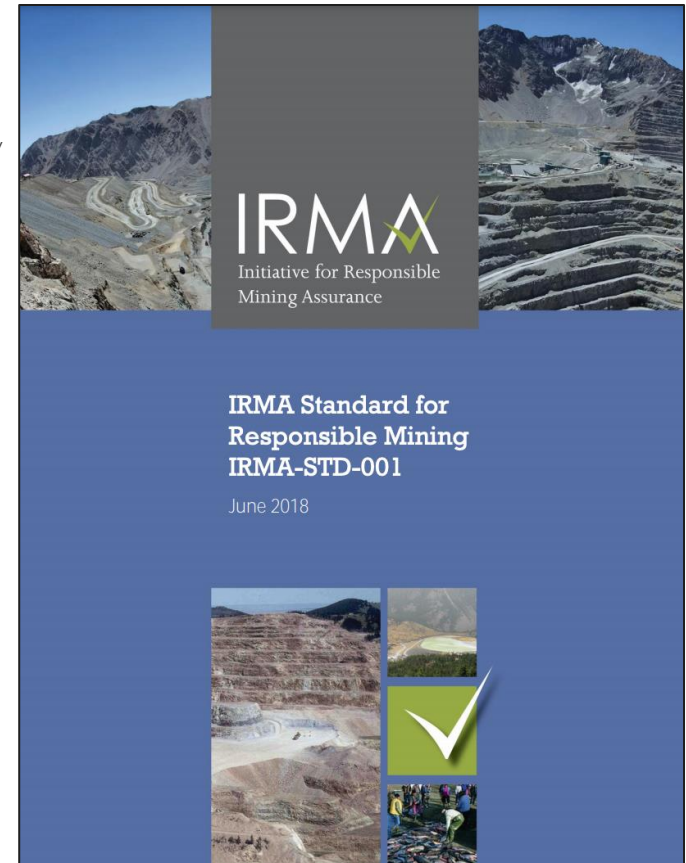
- Environmental and social impact assessment and management
- Free, Prior and Informed Consent
- Community support and benefits
- Resettlement
- Emergency preparedness and response
- Planning and financing reclamation and closure

Social Responsibility

- Labor rights
- Worker health & safety
- Community health and safety
- Conflict affected areas
- Security arrangements
- Cultural heritage protection
- Artisanal and small-scale mining (ASM)

Environmental Responsibility

- Water management
- Water (tailings) management
- Air quality
- Greenhouse gases emissions
- Noise management
- Biodiversity, ecosystem services, protected areas
- Cyanide management
- Mercury management



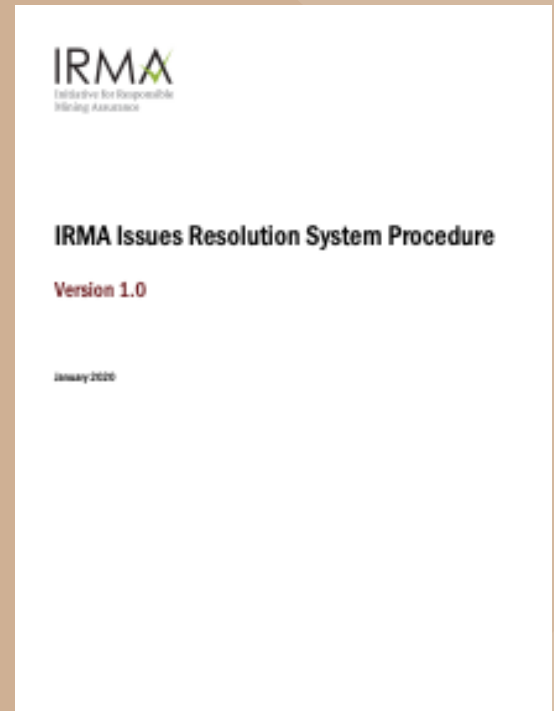
What is the IRMA Issues Resolution System Procedure?

IRMA welcomes stakeholder engagement, complaints, and input on all IRMA activities, including feedback on IRMA standards, audits, and certifications.

The IRMA Issues Resolution System Procedure is a process that ensures that **we take your complaints seriously**. We make impartial efforts to resolve and document all complaints and their resolutions.

This presentation will help guide you through the procedure.

Access IRMA's Issues Resolution System Procedure at <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>.



The IRMA Issues Resolution System

Who May Bring a Complaint?

Anyone. Any party may bring a complaint. We are open to complaints from representatives of communities, unions, NGOs, companies, purchasers, investors, YOU—anyone may bring a complaint.

What Topics Can be Subjects of Complaints?

Any topic. We are open to complaints regarding any concerns you may have related to IRMA standards, audits, certification, personnel, or any aspect of the IRMA program.

When May Complaints be Brought?

Any time. We want to hear from you as soon as you can bring your complaint. Sooner is often better, but we want to hear from you when you are ready to bring your complaint.

How to File a Complaint



Access the IRMA Stakeholder Complaint Form at <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

File a complaint using the IRMA Stakeholder Complaint Form available on the IRMA Website. Forms and questions related to complaints may be submitted to issues@responsiblemining.net or by mail to IRMA, P.O. Box 289, Port Townsend, WA 98368, USA.

If you have a complaint related to a specific mine site assessment, contact the Certification Body overseeing the assessment. This information is available on the IRMA website Mines Under Assessment page.

Types of Information Requested

The IRMA Stakeholder Complaint Form is a simple form. It requests information including:

- Name, Address, Contact Information
- Organization/Company/Sector
- Complaint Details:
 - Nature and details of issue
 - When did issue take place?
 - Who was or is involved?
 - Evidence (e.g. photographs, videos, documents, etc.), if any
 - Steps taken to attempt to resolve the issue and outcomes of those efforts
 - Recommended steps or processes to address the issue

Overview of the Issues Resolution Process

1

Step 1

Initial Discussion with IRMA Secretariat

Discuss your issue with the IRMA Secretariat.

2

Step 2

Resolution Using Appropriate Pathway

If the issue is not resolved during initial discussion, a resolution pathway is selected for further investigation and consideration of the issue.

3

Step 3

Escalation to Ad Hoc Resolution Committee

If the issue remains unresolved, an Ad Hoc Resolution Committee is formed if the stakeholder wishes to proceed with resolution.

Step 1

Initial Discussion with IRMA Secretariat

The first step is to contact the IRMA Secretariat by submitting a Stakeholder Complaint Form via email or mail to issues@responsiblemining.net.

The IRMA Secretariat will attempt to resolve the issue through an informal discussion with the person(s) filing the complaint.

Even if the person(s) filing the complaint do not wish to participate in a discussion (e.g. due to desire to remain anonymous), the IRMA Secretariat will still review the complaint.

Step 2

Resolution Using Appropriate Pathway

Below are types of anticipated stakeholder issues and related resolution pathways.

Issue	Pathway
Action/Inaction of Certified Mine or mine at IRMA achievement level	Mine → Certification Body → IRMA → Ad Hoc Resolution Committee
Actions/Inactions of a Certification Body	Certification Body → IRMA → Ad Hoc Resolution Committee
Appeals of Certification Body Decisions	Certification Body → IRMA → Ad Hoc Resolution Committee
IRMA Policies or Procedures	IRMA → Subcommittee of IRMA Board → IRMA Board <i>OR</i> IRMA → Ad Hoc Resolution Committee
IRMA Standards	IRMA → IRMA Scheduled Standard Revision Process
IRMA Personnel	IRMA Personnel → IRMA Executive Director → Ad Hoc Resolution Committee
Other Regarding IRMA Program	Determined by Issue

Step 3 (If Needed)

Escalation to an Ad Hoc Resolution Committee

If all efforts to resolve an issue have been exhausted, stakeholders may raise the issue with an Ad Hoc Resolution Committee, put together to address the issue. The Committee will include three members selected based on the nature of the issue.

Committee members must know the IRMA program, have relevant expertise, and have no conflicts of interest. Members may include representatives of the following:

- IRMA Board
- IRMA subcommittees or advisory groups
- IRMA member or partner organizations
- Academia from fields relevant to the program
- Civil society
- Specialists in oversight of certification bodies/programs

Additional Considerations

Confidentiality

Stakeholders may bring their issue confidentially and should inform the IRMA Secretariat if they do not want to be identified to other parties who are the subject of a complaint.

Anonymity

Stakeholders may remain anonymous when filing a complaint. The complaint should have as much detail as possible as the IRMA Secretariat may have no way to seek clarity or further details related to the complaint.

Safeguarding Stakeholders' Rights and Freedoms

The IRMA Issues Resolution System shall not be used to substitute, circumvent or override the legal rights of any party to use judicial or non-judicial mechanisms to remedy or resolve a grievance.

Conflicts of Interest

All individuals involved in investigation or decision-making on an issue shall declare any actual or potential conflicts of interest (e.g. that may compromise impartiality) and disqualify themselves accordingly.

Assistance Raising Issues

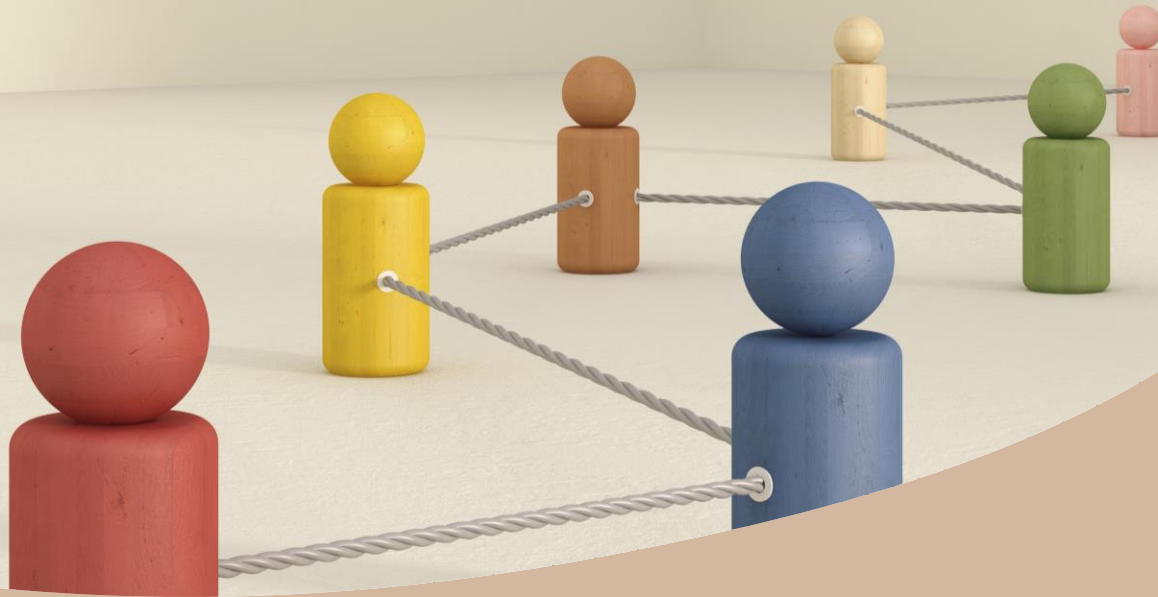
- **You may appoint a representative or advisor** to accompany you in raising your issue with IRMA.
- **You may request translation support from the IRMA Secretariat if necessary** to issue your complaint in English. Send a request via email to issues@responsiblemining.net.

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