

Rohitash Dhawan, President and CEO, ICMM.

Pierre Gratton, President and CEO, MAC.

Michèle Brühlhart, Executive Director, Copper Mark.

David Tait, CEO, World Gold Council.

Re: Concern Over Industry-Led Mining Sector Standards

Dear Mr. Dhawan, Mr. Gratton, Ms. Brühlhart, and Mr. Tait,

We are writing to you as leaders of mining industry associations on behalf of community organizations, labor unions, and Indigenous, environmental, and human rights groups to express concern over efforts by the mining industry to create a new mining sector audit and certification standard.

Our organizations firmly believe in the need for mining companies to increase transparency over their environmental and human rights practices. We also believe that the positive and necessary trend towards human rights due diligence and responsible sourcing laws, such as in the European Union and United States, will increase regulatory and judicial scrutiny of mining companies' respect for human rights and the environment.

As focus on the mining industry's practices intensifies, voluntary standards and audit schemes are one tool that mining companies can use to provide information to regulators, investors, and customers on human rights and environmental performance. While audits and certifications provide [no guarantee](#) of a company's respect for human rights, they nonetheless provide data on a company's practices that can be cross-referenced with other sources, including community and civil society engagement and reporting.

The credibility of the information generated by audits under voluntary standards depends on the quality of the standard and audit methodology. Existing mining sector standards [vary widely](#) and many lack the transparency and rigor to provide credible information on companies' practices.

We believe that strong voluntary standards require a governance model that provides at least an equal voice to rights holders and their allies (such as Indigenous Peoples, mining-affected communities, workers and labor unions, and nongovernmental organizations) and businesses (such as mining companies, customers, and investors).

Effective and credible equal governance requires voting or decision-making that protects the interests of both communities and workers. Crucial are proactive measures to avoid the risk of co-option or capture of non-industry groups, and to ensure that independent nongovernmental organizations are not replaced by groups effectively representing industry interests, such as international financial institutions, trade associations, or nongovernmental organizations that are funded or sponsored by mining companies.

Equal and shared co-governance establishes the foundation necessary to work towards a comprehensive standard, a rigorous audit methodology that supports effective participation in the audit process from affected communities and workers, and public and detailed audit reports.

Such a mining sector standard exists: the Initiative for Responsible Mining Assurance (IRMA)'s Standard for Responsible Mining, which was developed through an equal governance model. IRMA's standard can no doubt be improved upon, but it represents the most comprehensive, transparent, and credible mining sector audit standard available today.

Our understanding is that your organizations, rather than looking to increased mining sector engagement with IRMA's standard and audits, will seek to draft and formulate a new standard and audit methodology. We are concerned that this new standard will not be developed with meaningful participation from mining-affected communities, workers and labor unions, and nongovernmental organizations and will instead entrench mining industry control over the standards and audits through which companies are assessed.

The end result will be a standard that lacks the transparency and rigor needed to provide credible information on the human rights and environmental performance of mining operations. This would harm the credibility of the companies involved and may be considered “greenwashing.”

We would welcome a meeting with you to discuss this letter and answer any questions you might have. Kindly contact us at your convenience should you wish to arrange a meeting.

Thank you for your consideration of these important issues.

Yours sincerely,

Marilou Verano, Ang Aroroy Ay Alagaan, Inc.-Philippines

Tilman Massa, Co-Director, Association of Ethical Shareholders Germany

Phil Bloomer, Executive Director, Business & Human Rights Resource Centre

David Chambers, President, Center for Science in Public Participation

Galina Angarova, Executive Director, Cultural Survival

Matthew Gianni, Co-Founder, Deep Sea Conservation Coalition

Ulrich Karlowski, Board of Directors, Deutsche Stiftung Meeresschutz

Blaine Miller-McFeeley, Senior Legislative Representative, Earthjustice

Jennifer Krill, Executive Director, Earthworks

Charles Griffith, Climate and Energy Director, Ecology Center

Steve Trent, Chief Executive Officer, Environmental Justice Foundation

Kate Finn, Executive Director, First Peoples Worldwide

Andrei Danilova, Director, Foundation of Sami Heritage and Development

Allyson Siwik, Executive Director, Gila Resources Information Project

Eric Ngang, Global Policy Adviser, Global Witness

John Hadder, Executive Director, Great Basin Resource Watch

Arvind Ganesan, Director, Economic Justice and Rights, Human Rights Watch

Dmitry Berezhkov, Editor-in-Chief, Indigenous Russia

Glen Mpufane, Director of Mining and DGOJP and OHS lead, IndustriALL Global Union

Elsa Dominish, Research Principal, Institute for Sustainable Futures, University of Technology Sydney

Tjan Zaotschnaja, International Committee of Indigenous Peoples of Russia

Andrea Carmen, Executive Director, IITC, International Indian Treaty Council

Pavel Sulyandziga, Chairperson, International Indigenous Fund for Development and Solidarity (Batani Foundation)

Set Zabelin, International Socio-Ecological Union

Aaron Acosta, Program Director, Investor Advocates for Social Justice

Coenraad Krijger, Director, IUCN National Committee of the Netherlands

Chris Alford, Senior Strategist, Lead the Charge

Nanna Clifforth, Coordinator, NOAH Friends of the Earth Denmark

Julia Naime, Senior Supply Chain Advisor Minerals and Palm Oil, Rainforest Foundation Norway

Gonçalo Carvalho, Executive Coordinator, Sciaena

Galina Angarova and Kate Finn, Co-Chairs of the Executive Committee, SIRGE Coalition (Securing Indigenous Peoples' Rights in the Green Economy Coalition)

Christoph Widmer, Director, Society for Threatened Peoples

Mat McDermid, Program Director, The Sunrise Project

Julia Poliscanova, Senior Director Vehicles and Emobility Supply Chains, Transport & Environment

Marty Warren, National Director, United Steelworkers Canada

Johannes Peter, Policy Officer for Business & Human Rights, World Economy, Ecology & Development

Francisco Ferreira, President, ZERO – Association for the Sustainability of the Earth System

Fadzai Midzi Programs Assistant, Zimbabwe Environmental Law Association