



Lead the Charge

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# An Assessment of Third-Party Assurance and Accreditation Schemes in the Minerals, Steel and Aluminum Sectors:

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A tool for automakers and other supply chain stakeholders

LEAD THE CHARGE

AN ASSESSMENT OF THIRD-PARTY ASSURANCE AND ACCREDITATION SCHEMES IN THE MINERALS, STEEL AND ALUMINUM SECTORS



# Executive Summary

## Background and context

Today, across a variety of sectors connected to the automotive industry, there is a proliferation of third-party assurance and accreditation schemes. In the last few years, specifically in the raw minerals space, there has been a proliferation of industry-led initiatives such as Nickel Mark and a proposed “consolidated” mining standard led by four mining industry associations. This has been accompanied by an increasing trend of policymakers relying on voluntary schemes, with regulations in the EU and proposals for new regulations in the United States incorporating the use of such schemes.

These schemes develop voluntary standards with specific performance criteria on human rights, environmental and/or climate issues that companies can be evaluated against. They then assess, or facilitate the assessment of, companies or facilities against this standard, typically with the support of third-party auditors. Some schemes then issue certifications to companies stating that this assessment has determined that the company is conformant with their standard. These assurance and accreditation processes are widely used by automakers and other downstream companies as tools for their responsible sourcing practices, particularly when the assessments relate to individual mining sites, smelters, refiners or manufacturing plants in their supply chains.

However, with the proliferation of these schemes has come increased scrutiny with respect to the assurance that they claim to provide regarding company performance against international human rights, environmental and climate standards. Civil society organizations have questioned the credibility of specific schemes with regards to the assurance they claim to provide for end-users in relation to company performance on human rights and environmental issues, as well as emissions reductions, while other assessments have compared multiple schemes and found that they contribute to very different extents towards implementing due diligence obligations.

These assessments have identified common problems across third-party assurance schemes,

including the lack of robust multi-stakeholder governance systems; inadequately detailed and comprehensive performance criteria; reliance on flawed social audit processes that do not adequately involve affected rights-holders; insufficient requirements to implement corrective measures; and inadequate levels of transparency. Ultimately, these schemes are therefore inappropriate substitutes for broader due diligence responsibilities and, “at best, should be seen as one source of information about a company’s practices.”

Nonetheless, when assurance schemes are governed by multiple stakeholders, and include independent, publicly available, third-party auditing, they can serve as a useful, but not the sole, tool for downstream companies, policy makers and investors by providing credible data points regarding the performance of a company, project or facility at any given time.

## Methodology of the assessment

This assessment was developed as part of Lead the Charge’s 2024 Leaderboard, due to be published in February 2024. It is published here as a standalone assessment to facilitate its use as a tool for automakers, and other automotive supply chain stakeholders, in order to make informed decisions regarding their use of these accreditation schemes for the mining sites, smelters, refiners, steel and aluminum plants and other facilities in their supply chains.

The assessment evaluated each scheme against a series of minimum criteria relating to the extent to which a third-party assurance scheme can be considered credible and robust. These include an assessment of the governance of the standard; the credibility and transparency of the assurance/accreditation process; the role of impacted rights holders in this process; requirements regarding corrective actions for instances of non-conformance and/or human rights or environmental harms identified during the audit process; and the existence of an effective and accessible grievance mechanism.

In total, eight accreditation schemes were assessed: Responsible Steel; The Initiative for Responsible Mining Assurance (IRMA); Aluminium Stewardship Initiative (ASI); Responsible Minerals Initiative (RMI); Copper Mark; Towards Sustainable Mining (TSM); International Council on Mining & Metals (ICMM); and Global Steel Climate Council (GSCC).

### Results of the assessment and recommendations

The assessment revealed considerable divergences with regards to the credibility and effectiveness of these schemes, broadly aligning with the results of similar studies undertaken by [Germanwatch](#) and [Mercedes](#).

At 88%, IRMA was the strongest performer by a considerable margin, with Responsible Steel coming in second place with a score of 63% against the minimum criteria. Notably, IRMA was the only scheme to achieve full points against the criterion on multi-stakeholder governance. ResponsibleSteel was the second strongest performer against this criterion: guaranteeing equal decision-making power for civil society in its membership body but not for its board of directors.

RMI, ASI, TSM and CopperMark all received scores ranging from 38% to 59%. These schemes have made progress against some of the assessment

criteria, but demonstrated significant flaws by failing to meet multiple criteria related to multi-stakeholder governance, transparency of audit results and corrective action plans. At the bottom of the assessment sits GSCC, scoring just 3%. The ICMM's Performance Expectations Validation process also received an extremely low score - meeting only 16% of the minimum criteria.

The analysis underscores the extent to which auditing and accreditation schemes vary in their creation and management. Ultimately, mandatory legal frameworks (accompanied by strong enforcement capacity) remain the gold standard in ensuring responsible sourcing and supply chains that don't negatively impact Indigenous Peoples, communities, workers and the environment.

Automakers and other downstream companies, investors, policymakers and the schemes themselves should make a concerted effort to drive up standards as they relate to third-party assurance and accreditation systems so that they can fulfill their potential of driving meaningful improvements in company practice.





# Introduction

Today, across a variety of sectors connected to the automotive industry, there is a proliferation of third party assurance and accreditation schemes. In the last few years, specifically in the raw materials space, there has been a proliferation of industry-led initiatives such as Nickel Mark and a proposed “consolidated” mining standard led by four mining industry associations.

At the same time, there is an increasing trend of policymakers relying on such voluntary schemes. For instance, the recently adopted EU regulations on conflict minerals (2021) and batteries (2023) both have a process in place for the recognition of “due diligence schemes” as equivalent to the requirements set out in the law. The EU’s proposed Critical Raw Materials Act, which was recently agreed, uses “certification schemes” instead as a tool to decide whether a project can be labeled as “strategic”, thereby receiving government support.

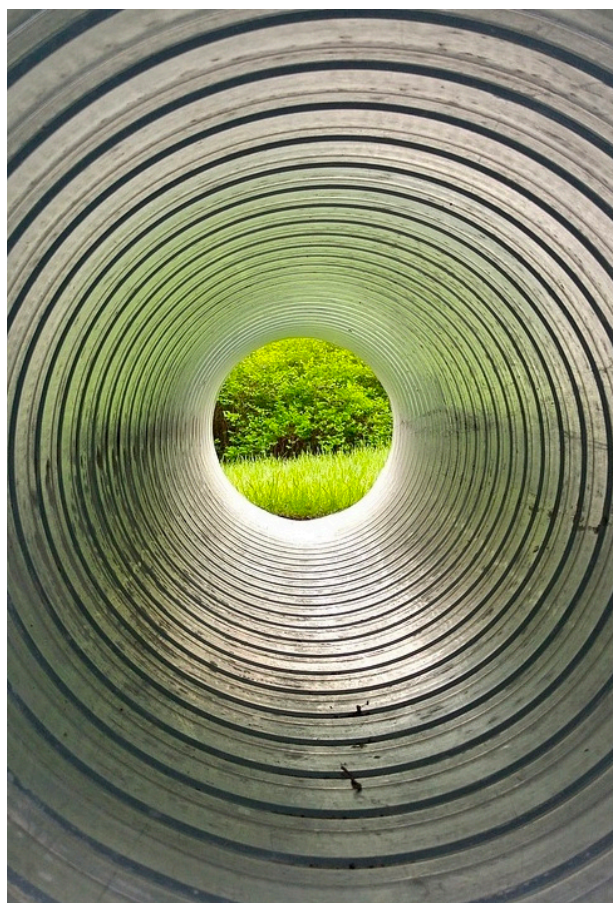
While not yet codified into legislation or regulations, there are growing efforts in the United States to follow Europe’s example. Most notably the recommendations of the [Interagency Working Group on Mining Laws, Regulations, and Permitting](#) include using existing “voluntary certification schemes”, like the Initiative for Responsible Mining Assurance (IRMA), to help prioritize funding for projects with strong social and environmental practices.

Whilst such schemes can be useful in providing information about a specific project in a given point in time, stakeholders must recognise that not all schemes are created or managed equally and that under no circumstance should they replace high bar, mandatory human rights and environmental due diligence laws and regulations.

This briefing provides an overview of some of the concerns that have been raised regarding third party assurance and accreditation schemes. It then sets out a set of minimum expectations for these schemes so that they can more effectively drive positive change on human rights, environmental and climate issues. Finally, the briefing provides an assessment of existing schemes against these criteria, providing recommendations for action.

This assessment was developed as part of [Lead the Charge’s 2024 Leaderboard](#), due to be published in February 2024, with the aim of raising awareness among automakers of the strengths and weaknesses of different schemes, and to encourage automakers to use more robust schemes. With numerous standards existing across supply chains and markets, it is important to push for alignment across standards and that all relevant stakeholders adopt a coordinated approach.

The Lead the Charge network decided to publish the assessment as a standalone briefing to further this goal and facilitate its use as a tool for automakers, and other automotive supply chain stakeholders, in order to make informed decisions regarding their use of these schemes, as well as to more effectively use their influence to drive up standards and address the shortcomings revealed by this assessment.





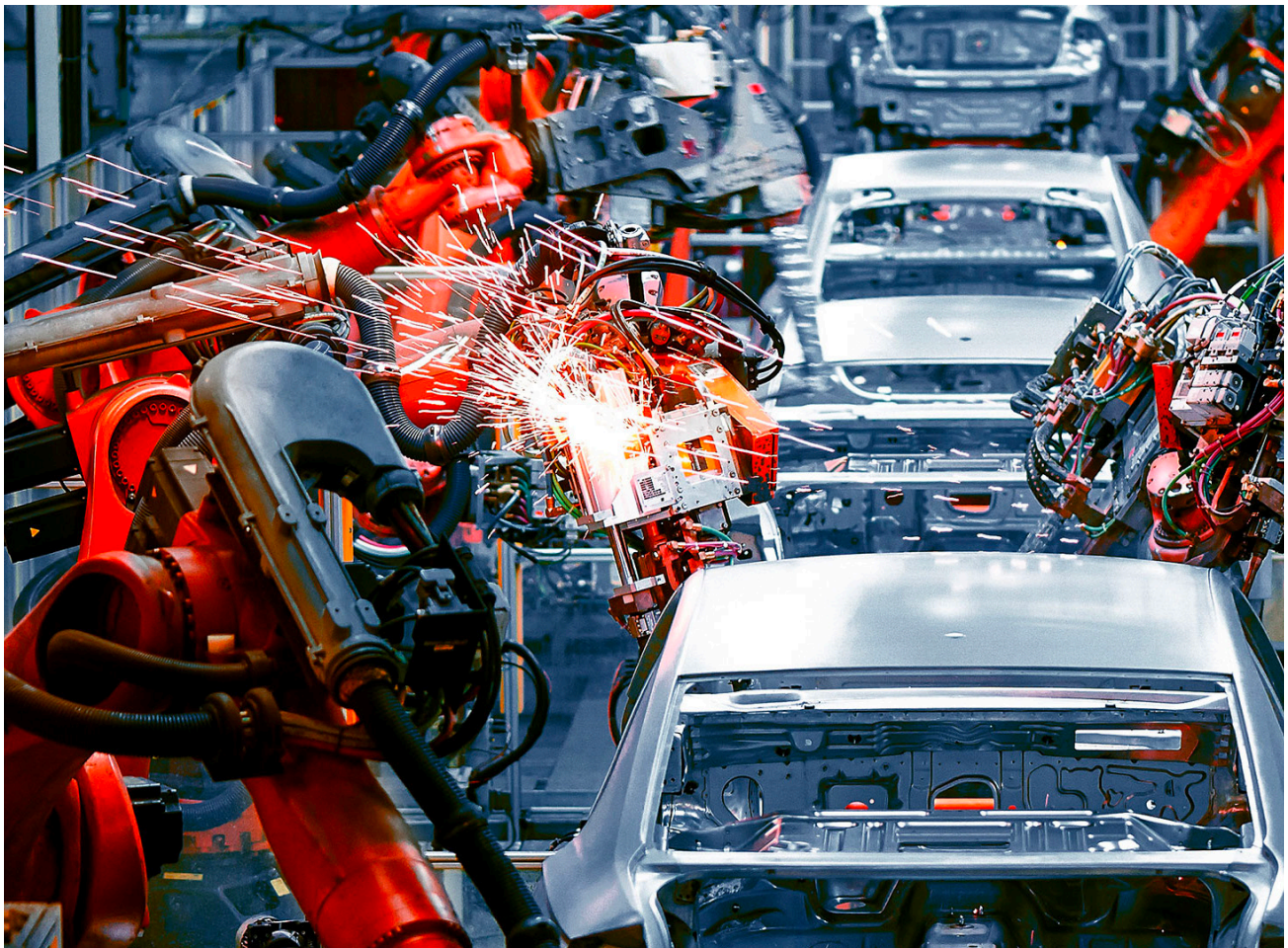
# Third party assurance and accreditation schemes and their use in automotive supply chains

Third party assurance and accreditation schemes are defined in this briefing as voluntary initiatives that “assess companies or facilities against a standard developed by the initiative.” The third party standards developed by these initiatives contain specific performance criteria on human rights, environmental and/or climate issues that companies voluntarily choose to be assessed against. These criteria typically incorporate international human rights and environmental standards, but “to varying degrees.”<sup>1</sup>

Schemes then typically conduct, or facilitate, assessments of company performance against its standard. These assurance processes typically rely on third-party auditors, although some schemes also allow for companies to self-assess their performance against the standard.

Finally, some schemes also have an accreditation process to inform other stakeholders about a company’s performance against its standard. Sometimes this process results in a certificate being issued to the company that “certifies” them as being conformant with their standard.

These schemes are widely used by automakers as tools for their human rights and environmental due diligence processes, as well as for reducing their scope 3 supply chain emissions. Lead the Charge’s annual Leaderboard, finds that the majority of automakers use a wide range of third party schemes for these purposes. In the upcoming 2024 edition of the Leaderboard, 78% of the automakers evaluated used at least one such scheme.



## Criticisms of third-party assurance and accreditation schemes

Voluntary standards have therefore emerged as one way to encourage improved environmental and social performance across different industries. Their progress in achieving these outcomes, however, has been severely limited: human rights abuses and environmental degradation remain endemic across the raw materials sectors and their supply chains.

In fact, some voluntary standards have been criticized for enabling business as usual rather than raising the bar of company behavior. One example is the Aluminum Stewardship Initiative (ASI), which has come under criticism from Human Rights Watch and Inclusive Development International (IDI). Used by some automakers, including BMW and Mercedes-Benz, to aid responsible aluminum sourcing, ASI's certification process applies the initiative's own Performance Standard to assess the upstream mines, refineries, and smelters connected to aluminum production.

However, the initiative has been criticized for providing ASI certification to companies implicated in failures to properly resettle and compensate communities impacted by bauxite mining. For example, China Hongqiao is ASI certified despite sourcing its bauxite from La Société Minière de Boké (SMB), which Human Rights Watch and IDI have [linked to displacing communities and contaminating their water sources](#).

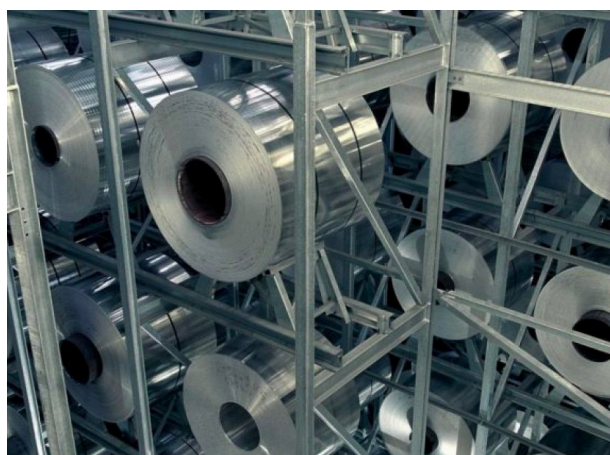
In December 2023, La Compagnie des Bauxite de Guinée (CBG) received [provisional ASI certification](#), despite the fact that, since 2019, CBG has been in IFC formal mediation with thirteen communities for failing to resettle them or compensate them for impacts on their livelihoods. In the light of this, civil society organizations are [questioning ASI's credibility](#).

Human Rights Watch [attributes these failings](#) to the fact that the ASI's human rights requirements lack adequate detail, particularly with regards to resettlement standards, where it fails to break down the International Finance Corporation (IFC) standards into specific criteria to assess companies against. Human Rights Watch also criticizes ASI for not guaranteeing "equal participation and voting rights for impacted communities and civil society

groups versus downstream and upstream industry representatives", for providing insufficiently detailed requirements for consulting local communities, and for not providing an adequate level of transparency in its public audit reports.

The Global Steel Climate Council's (GSCC) provides another example. The GSCC launched last year with a standard that was so problematic, civil society groups urged stakeholders to [disregard it all together](#). The groups criticized the initiative for lacking a credible multi-stakeholder process, enabling industry to write its own rules and setting back decarbonization efforts. Another fundamental flaw that the groups highlighted is that the scheme only focuses on reducing sectoral emissions in the steel sector and completely ignores the steel industry's broader impacts on workers, communities, and the environment.

Strong, enforceable laws and regulations remain the best means to ensure that companies respect the environment and human rights, particularly those of Indigenous and other affected rights-holders. However, until these requirements become widespread and better enforced, high-bar voluntary schemes with multi-stakeholder governance that implement credible and transparent assurance processes can be useful tools. However, it is important to stress that such schemes alone cannot provide guarantees that companies and their suppliers are fulfilling due diligence requirements or safeguarding human rights and the environment in their business operations.





# Common problems with third party assurance and accreditation schemes

Across the steel, aluminum, and battery minerals industries, most auditing and accreditation schemes have common problems, including a lack of transparency, varying degrees of quality, and failures to ensure robust multi-stakeholder governance and meaningful rights-holder participation.

## Varying degrees of quality and credibility

The strongest and most widely recognized human rights framework for responsible business conduct are the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#). The UNGPs underline the responsibility of companies to respect human rights and to fulfill this responsibility by undertaking human rights due diligence. Aligned frameworks, notably the [OECD Due Diligence Guidance for Responsible Business Conduct](#), also provide clear, step by step tools, to support companies with implementation.

Yet, voluntary industry schemes are aligned with these frameworks to varying degrees. In addition to often not establishing adequately detailed human rights and environmental requirements, they can also “place too great a focus on an evaluation of company policies and systems rather than on the impact of companies’ conduct on affected communities.”<sup>2</sup> Consequently, third party schemes vary widely in the extent to which they adequately incorporate, and assess performance against, appropriate human rights and environmental standards.

The non-governmental organization, Germanwatch, [recently analyzed eight assurance schemes](#) across the raw materials sector, finding that none of the analyzed assurance schemes “are able to ensure that member companies are fulfilling the requirements of their respective standards.” IRMA scored the highest overall and still was deemed “suitable only to a limited degree in terms of implementing its criteria.”

Further exacerbating this issue is the fact that audits are conducted over a limited time period, “creating a risk that serious human rights and environmental abuses are overlooked.”<sup>3</sup> At best, they provide a snapshot of company practices over the

audit period, not a holistic assessment. For example, [Human Rights Watch](#) has [linked](#) the short term nature of audits to the underreporting of pervasive rights violations in raw materials supply chains, including child labor, forced labor, discrimination, freedom of association, and abuse at worksites.

Given such deficiencies in assessing the full scope of human rights risks, a facility or company certified under any voluntary standard therefore means, at best, that it is in compliance with that scheme’s standard, and should not be considered as sufficient proof of adequate human rights due diligence.

Such problems are not limited to human rights issues. With regards to climate, for example, the requirements of the aforementioned GSCC standard were [criticized by civil society organizations](#) for facilitating “cherry-picking, where steelmakers with access to scrap supplies can be rewarded for meeting an emissions standard they designed without doing anything additional for years to come.” They conclude that the scheme is not fit for purpose to “drive industry change to align with limiting warming to 1.5C degrees.”

## Lack of transparency

Third party schemes often fail to provide sufficient transparency on the findings of their auditing and certification processes. In some cases, findings aren’t published at all: schemes simply state that member companies and/or facilities are compliant with their standard. When findings are published, they often exclude important details on the audit process and on findings of compliance or non-compliance. This information is core to understanding why a scheme has determined that a particular company or facility has met the human rights, environmental and/or climate requirements of its standard. Without this information, external stakeholders such as local communities and civil society organizations are unable to investigate the quality of the audit. Limited disclosure, therefore, enables companies to continue harmful behaviors unchecked.

Opacity also makes it difficult to trust the assurance process and its findings by all actors across

the supply chain. Buyers cannot be sure that their suppliers are really complying with their codes of conduct and contractual obligations, risking their ability to deliver on responsible sourcing commitments. Governments face greater challenges to ensure that companies are adequately complying with laws and regulations that protect its citizens. Civil society groups, workers and local communities cannot monitor corrective actions and ensure companies address any non-conformities identified in the audit. And affected rights-holders cannot have confidence that an assurance scheme, including and importantly its grievance mechanisms, will be responsive to their needs. Without trust, there is no legitimacy.

### **Risk of greenwashing**

Many voluntary schemes across the steel, aluminum and minerals sectors are industry-led and controlled, with varying degrees of engagement and shared decision making with rights-holders and civil society. Some schemes do not involve civil society or rights holders at all.

This is problematic for a variety of reasons. In the worst case, it enables companies to set their own rules with regards to what is considered responsible

practice on human rights, environment and climate, actively facilitating industry greenwashing.

Further, inadequate engagement and shared decision-making with affected communities and civil society limits the ability of schemes to “develop strong standards and rigorous audit processes.”<sup>4</sup> This is because human rights and environmental due diligence fundamentally shifts companies’ typical risk assessment frameworks and processes from solely accounting for risks to the business’ bottom line to identifying how business’ activities create risk to human rights and the environment. In this model, company standards and practices are continuously evaluated and strengthened to improve outcomes for affected people and communities, not just for profit.

Given the cultural shift that such a rights-based approach necessitates, and the fact that business interests can diverge with social welfare, industry-led efforts are not capable of addressing the full scale of social and environmental harms of their operations. Meaningful engagement with affected-rights holders counters this and is one of the most important means for effective risk identification and management in due diligence processes.



*Aerial view of an electric car and battery factory in Grünheide, Germany. Adobe Stock.*



# Minimum criteria for robust and credible

In addition to ensuring adequate levels of transparency and alignment with existing international human rights and environmental standards, third-party schemes should adhere to the following minimum criteria necessary for robust assurance and accreditation processes.

## **Multi-stakeholder governance and auditing with rights-holders' participation**

Multi-stakeholder governance can help overcome many of the aforementioned limitations. Equal representation of civil society and affected rights-holders has been [shown to improve risk-identification and management](#), contributing to the sustainability of operations, whereas their [minority representation can further worsen industry's tendency to preserve the harmful status quo](#). Shared decision-making holds companies accountable to robust, rights-based standards and, importantly, with regards to the necessary corrective actions based on audit findings. It is a fundamental safeguard against schemes functioning as a platform for industry self-regulation and greenwashing.

Safely including rights-holders in the auditing process is similarly important. While audits cannot guarantee that companies or their suppliers are respecting human rights, meaningfully engaging rights-holders increases the possibility for them to provide credible information. For instance, on-site and group interviews designed without centering the needs of women, gender non-conforming people, and survivors fail to uncover incidents of workplace [sexual harassment and gender-based violence](#). The failure to provide a safe, confidential space for affected rights-holders to meaningfully discuss issues challenges the legitimacy of audits to accurately assess company practices.

## **Effectiveness and Quality Control**

Robust systems and controls to ensure high quality and effective assurance processes include using independent auditors who conduct site-level verification; ensuring competent audit implementation through auditor training, evaluation and competency requirements; developing protocols, tools and operating procedures to ensure the consistent interpretation and application

of the standard and implementing systems for effective and responsible data management. Equally important are processes and systems for the continuous improvement of the standard, and its associated assurance process, which include ongoing risk assessments, and monitoring and evaluation of impacts. Such systems are the focus of ISEAL, a global leader in defining and communicating what good practice looks like for third-party standard setting and assurance processes in the sustainability space. ISEAL publishes Codes of Good Practice for third party schemes, covering issues such as [standard-setting and assurance processes](#).

Alignment with ISEAL's Codes of Good Practice is therefore a useful reference point regarding the quality and credibility of assurance systems. However, ISEAL does have its own shortcomings, particularly with regards to [its requirements on multi-stakeholder governance and its alignment with international standards for human rights due diligence](#). Consequently, in this assessment, ISEAL alignment has been included as a minimum criterion, but not as a proxy for the overall credibility and robustness of the assessed assurance schemes.

## **Corrective Actions**

Credible human rights and environmental due diligence requires companies to identify human rights and environmental risks on an ongoing, proactive basis and continually improve their systems and practices based on this information. Voluntary schemes, given their structure and challenges, can support, but not function as the entirety, of a company's due diligence process. Even so, schemes should require companies to develop and implement corrective action plans (CAPs) to address, within an associated timeframe, shortcomings identified in their audits as conditions of membership and certification.

Rights-holders must also be included in planning, implementing and monitoring of corrective actions. Without this engagement, companies and schemes risk any improvements not being adequate, appropriate, and responsive to the needs of those most impacted. Schemes lacking such

requirements further risk their ‘certification’ being a mere ‘check the box’ exercise that doesn’t improve environmental, social, and governance outcomes.

### **Robust Grievance mechanism**

Businesses have the responsibility to remedy the harms caused to rights holders as a result of their activities. Robust grievance or complaints mechanisms aid communities in accessing justice and remedy when such violations occur. They also serve as an important check on the credibility of a scheme’s audits and accreditations, as they provide an impartial channel through which stakeholders can contest the findings of an audit or certification if they believe that important issues have not been addressed or key evidence has been overlooked.

Often, individuals and groups whose rights are violated by companies lack the resources to

seek justice through complex, expensive judicial procedures. Having an independently facilitated grievance mechanism offers an alternative method that helps assure affected rights holders’ that their complaints are received and responded to. Importantly, the independent facilitator advances a process, such as dispute resolution or mediation, that helps balance power asymmetry and secure appropriate remedy for the affected group(s).

For grievance mechanisms to achieve this end and gain the trust and confidence of affected rights-holders, they should be aligned with the [Effectiveness Criteria of the UN Guiding Principles on Business and Human Rights](#). This means ensuring that they meet criteria of legitimacy, accessibility, predictability, equity, transparency and rights-compatibility.<sup>5</sup>



## Methodology of the assessment

This assessment focuses on third party assurance and accreditation schemes within key industries and sectors of relevance to automotive supply chains, focusing on the minerals, steel and aluminum industries. Only schemes that implement, or facilitate, assurance and accreditation processes at the facility level are included in the assessment.<sup>6</sup> This focus is because a specific concern of members of the Lead the Charge network is the quality and credibility of these accreditation processes as they relate to mining sites, smelters and refiners, steel and aluminum plants and other facilities in the supply chains of automakers, who often use the information provided by these schemes for their responsible sourcing practices.

The methodology outlined below therefore sets out a number of core principles and minimum expectations relating to the extent to which a third party assurance or accreditation initiative can be considered robust. In order to allow for comparison across different schemes focusing on different sectors and / or issues, these criteria are focused on the process through which a third-party standard is developed and then implemented through its corresponding assurance and / or accreditation systems. These process-orientated criteria include an assessment of the governance of the standard, the credibility and transparency of the accreditation process, the role of impacted rights holders in this process, the role of corrective action plans to correct any shortcomings identified in an audit against the standard, and the existence of a grievance or complaints mechanism that can be accessed by impacted rights-holders and other key stakeholders. Alignment with ISEAL's Codes of Good Practice is also credited.

One additional criterion focuses on the requirements of the third-party standards themselves: evaluating whether the schemes' own performance expectations are aligned with existing international human rights and environmental standards. Our assessment criteria are well aligned with previous evaluations of industry schemes, such as the ones conducted by [Germanwatch](#), [Mercedes-Benz](#), or the [Common Standard Recognition Framework](#) launched by the Drive Sustainability initiative.

Each criterion is awarded a maximum point score of 1. There are three scoring thresholds for each criterion: full points, half points or no points. The exception to this is the criterion on multi-stakeholder governance, which was considered to be the most important criterion of all and so was awarded a maximum point score of 2 and has four scoring thresholds: full points, half points, quarter points or no points.

In total, eight accreditation schemes were assessed: Responsible Steel; The Initiative for Responsible Mining Assurance (IRMA); Aluminium Stewardship Initiative (ASI); Responsible Minerals Initiative (RMI); Copper Mark; Towards Sustainable Mining (TSM); International Council on Mining & Metals (ICMM); and Global Steel Climate Council (GSCC). Some of these schemes, such as ASI, ResponsibleSteel and IRMA, focus on a broad range of climate, environmental and human rights issues. Others are more narrowly focused, such as the GSCC, which solely focuses on emissions, and the RMI's Responsible Minerals Assurance Process which focuses on mineral risks from conflict-affected and high-risk areas.

The assessment was conducted by reviewing the websites and formal documents (such as constitutions, policies, and standard documents) of each scheme. Each scheme evaluated was also contacted by Lead the Charge prior to the publication of this report and invited to provide feedback on their scores, which was then taken into consideration in order to finalize the scores shared below.



# Minimum Criteria of the Assessment:

## 1. MULTI-STAKEHOLDER GOVERNANCE AND CIVIL SOCIETY CO-CREATION

This criterion evaluates whether a third party standard is developed and implemented through a robust system of multi-stakeholder governance. In order to score full points against this criteria, a scheme must be able to demonstrate that equal decision-making power has been formally awarded, through the scheme's corresponding governance documents, to rights-holders and civil society, alongside industry representatives.

Note that it is not sufficient to simply state "non-industry" - schemes must be explicit in naming equal governance with civil society (NGOs, organized labor and Indigenous organizations) and affected rights-holders.

### Full Credit - 2 point

- Equal governance of rights-holders and civil society: Affected rights-holders, their representatives and / or civil society organizations are guaranteed 50% representation and decision-making power overall.
- Affected rights-holders, their representatives and/or civil society organizations maintain equal decision-making power with industry regarding the implementation of the standard.

### Partial Credit - 1 point

- Multi-stakeholder governance where civil society / rights-holders representation and / or decision-making power is guaranteed but less than 50% overall.
- Evidence of structured stakeholder engagement in the development and revision of the standard.

### Partial Credit - 0.5 points

- Evidence of structured stakeholder engagement in the development and revision of the standard.

### Insufficient - 0 points

- Participation by industry only without a formal process of stakeholder engagement.
- A formal stakeholder engagement process does exist, but includes no mandatory or binding governance mechanism.

## 2. CREDIBLE AUDITS AND ACCREDITATION: AUDIT INDEPENDENCE AND RIGHTS-HOLDER PARTICIPATION

This criterion evaluates the credibility of the audit / assurance / accreditation processes that the different schemes use to evaluate the performance of companies' facilities, sites or projects against the standard that they have developed.

Two expectations are established: firstly, whether the schemes mandate that these audits must be undertaken by independent third-parties, with site-level verification, or whether the accreditation process can be undertaken through self-assessment and / or with no requirements regarding site-level verification. Secondly, the assessment evaluates whether schemes mandate the involvement of affected rights-holders in the audit process of specific facilities, sites or projects, which is considered essential for ensuring the veracity of the audit process.



<b>Full Credit - 1 point</b>
<ul style="list-style-type: none"> <li>■ The scheme mandates third party audit of practices, including site-level verification.</li> <li>■ The standard requires that the audit process includes participation of impacted rights-holders, ideally publishing advance notice of audits taking place.</li> </ul>
<b>Partial Credit - 0.5 points</b>
<ul style="list-style-type: none"> <li>■ The scheme mandates third party audit of practices, including site-level verification</li> <li>■ Unclear if certification requires participation of affected rights-holders.</li> </ul>
<b>Insufficient - 0 points</b>
<ul style="list-style-type: none"> <li>■ The certification allows for self-assessment against the standard and / or third party assessment that does not include site-level verification</li> </ul>

### 3. TRANSPARENCY OF AUDIT FINDINGS

This criterion assesses the level of transparency a scheme requires for the findings of the audits that are undertaken to assess company performance against its standard and, in particular, with regards to any accreditation statements made regarding company compliance with the standard.

To score full points against this criteria, schemes must be able to demonstrate that detailed audits are made available, including explanations of findings of conformance and non-conformance against individual performance expectations and information on the audit process itself.

<b>Full Credit - 1 point</b>
<ul style="list-style-type: none"> <li>■ The scheme requires that detailed audit reports be made publicly available, or at the very least made available to impacted rights-holders and other key stakeholders (publishing how engagement took place and detailing which stakeholder groups were engaged).</li> <li>■ Public audit reports disclose information on the audit process, including which stakeholders were engaged and how, and provide detailed explanations of findings of compliance and noncompliance against the standard's criteria, together with evidence used to justify these findings.</li> </ul>
<b>Partial Credit - 0.5 points</b>
<ul style="list-style-type: none"> <li>■ The scheme only requires partial disclosure or a summary of audit findings to be made public, indicating the company's performance against key criteria but without further explanation and/or without sufficient information on the audit process.</li> </ul>
<b>Insufficient - 0 points</b>
<ul style="list-style-type: none"> <li>■ The scheme only publishes the overall result of the audit / accreditation process, without any explanation or clarity around which criteria was assessed and the company's performance against the criteria.</li> <li>■ The scheme has no requirements with regards to transparency of audit results.</li> </ul>

#### 4. CORRECTIVE ACTION PLANS (CAPS)

This criteria looks at the requirements of schemes regarding the corrective actions needed to address any findings of non-compliance that were identified through the audit process. Two minimum expectations are established: firstly, ensuring adequate levels of transparency regarding CAPs and secondly that the scheme mandates rights-holder participation in CAPs.

##### Full Credit - 1 point

- The certification scheme standard for CAPs requires rights-holders to be involved in the development, implementation and monitoring of the plans
- The standard requires the results of all CAPs to be disclosed publicly, along with a description of the non-conformances needing to be addressed within an associated time-frame.

##### Partial Credit - 0.5 points

- The standard requires the results of all CAPs to be disclosed publicly, along with a description of the non-conformances needing to be addressed within an associated time-frame

##### Insufficient - 0 points

- No public disclosure relating to CAPs necessary to achieve certification.
- No assessment of whether CAPs have been implemented.

#### 5. GRIEVANCE MECHANISM

This criteria evaluates whether a scheme has put in place a robust mechanism through which rights-holders and other key stakeholders can raise grievances regarding the human rights and / or environmental impacts of a company whose operations have been publicly assessed by a third party scheme, as well as complaints regarding an audit process or outcome. The requirements of this criterion were structured around the [Effectiveness Criteria of the UNGPs for grievance mechanisms](#).

##### Full Credit - 1 point

- The scheme has an independently facilitated grievance mechanism.
- The scheme outlines how grievance mechanism is accessible (detailing measures taken to ensure it is known by stakeholders, appropriate translation and provision of assistance where necessary)
- The scheme ensures aggrieved parties have access to information, advice and expertise.
- Adequate disclosure is provided on grievances that are received through the mechanism, including the number of grievances received, the types of issues raised, the remedial actions taken in response and the outcomes.

##### Partial Credit - 0.5 points

- The scheme only has an internally facilitated grievance mechanism.
- The scheme only discloses summary information relating to recent grievances received through the mechanism.

##### Insufficient - 0 points



- There is no functioning grievance mechanism or no information is disclosed on the operation of the grievance mechanism.

## 6. ISEAL COMPLIANCE

ISEAL's [Codes of Good Practice](#) provide a globally recognised framework of third-party standards, defining key expectations for sustainability initiatives and their accreditation schemes. The ISEAL Standard-setting Code defines how a standard should be developed, structured, implemented and improved over time.

### Full Credit - 1 point

- Initiative is ISEAL code compliant

### Partial Credit - 0.5 points

- Initiative is an ISEAL community member

### Insufficient - 0 points

- Initiative is neither ISEAL code complaint or a community member

## 7. CREDIBLE AND COMPREHENSIVE STANDARD CRITERIA

This criterion focuses on the performance expectations of the standards developed by each scheme and whether these are aligned with existing international environmental and human rights standards.

### The standard used by the scheme is aligned, as a minimum, with the following:

Full Credit - 1 point (0.25 points for each issue area).

- Adherence to the UN Guiding Principles on Business and Human Rights.
- Adherence to the ILO Declaration on the Fundamental Principles and Rights at Work
- Adherence with UNDRIP and/or ILO 169, with FPIC assessed as part of the certification
- Paris Agreement goal of limiting temperature rise to 1.5 degrees

In order to facilitate comparison across different schemes, performance bands have been established in relation to the total number of points scored by the different schemes against each criteria. These are outlined in the table below:

PERFORMANCE BANDS	
TOTAL POINTS	DESCRIPTION
<b>8 points (full points)</b>	Robust standard that meets minimum criteria for effective governance, auditing / accreditation and implementation of its criteria
<b>7 points</b>	Robust scheme overall that still has some <u>shortcomings</u> but meets nearly all of the <u>minimum criteria for governance, auditing and / or accreditation against its standard</u>
<b>5-6 points</b>	Scheme has made notable progress in meeting most of the minimum criteria but has some <u>significant shortcomings</u>
<b>3 - 4 points</b>	Scheme has made progress in some areas but fails to meet multiple criteria for effective governance, auditing and / or accreditation against its standard
<b>Below 3 points</b>	Flawed scheme that fails to meet most of the minimum criteria for governance, auditing and / or accreditation



## Results of the assessment

The full results of the assessment of each scheme against the criteria outlined above are presented in the table below. Cells colored green indicate a scheme has met the full expectations against a given criterion, while cells colored yellow indicate that a scheme only achieved half points for that criteria and cells in orange indicate that a scheme scored 0 against that criteria. A darker shade of yellow has been used for scores of quarter points against the multi-stakeholder governance criterion.

The assessment revealed considerable divergences with regards to the quality and effectiveness of these schemes, broadly aligning with the results of similar studies undertaken by [Germanwatch](#) and [Mercedes](#). At 88%, IRMA was the strongest performer by a considerable margin, with Responsible Steel coming in second place with a score of 63% against the minimum expectations.

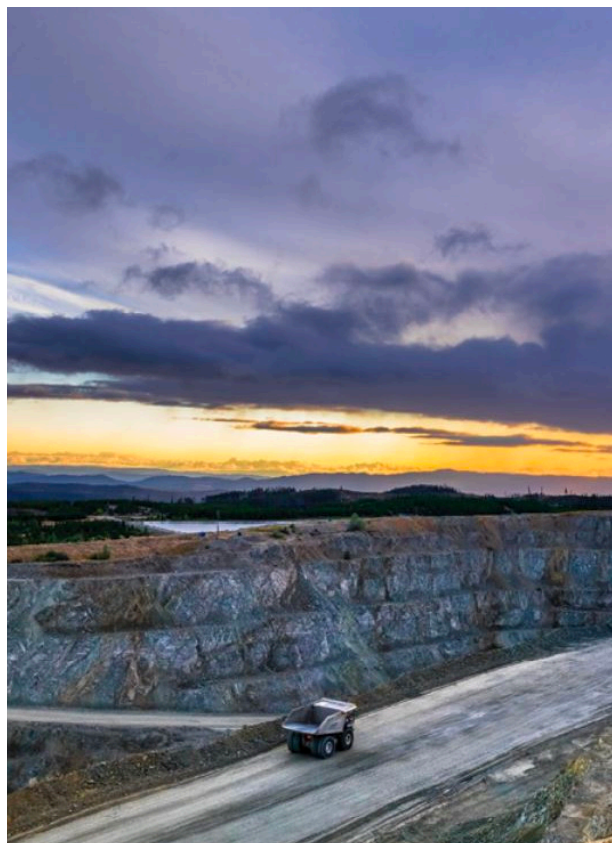
Notably, IRMA was the only scheme to achieve full points against the criterion on multi-stakeholder governance. ResponsibleSteel was the second strongest performer against this criterion: guaranteeing equal decision-making power for civil society in its membership body but not for its board of directors. IRMA did not attain the maximum score as result of its grievance mechanism not being independently facilitated and not yet being ISEAL code compliant. ResponsibleSteel, meanwhile, also did not meet the full expectations regarding these two criteria but lost additional points for not publishing adequately detailed audit reports and for not disclosing requirements regarding rights-holder participation in corrective action plans.

RMI, ASI, TSM and CopperMark received scores ranging from 38% to 59%. These schemes demonstrated progress against some of the assessment criteria: for example, TSM, ASI and CopperMark all scored full points against the criterion regarding credible audits, requiring independent auditors, site level verification and rights-holder participation. ASI, meanwhile, was credited for presently being the only scheme that is ISEAL Code Compliant. However, all of these schemes also demonstrated significant flaws, failing to meet multiple criteria across the assessment. Strikingly, none of these schemes

provide guarantees for equal decision-making power for civil society and affected rights-holders in their governance bodies. ASI and RMI do provide guarantees of civil society representation, but this is less than 50%. TSM and CopperMark do not provide such guarantees and were only credited for having mechanisms for structured stakeholder engagement for the development of their standards. ASI and TSM also scored zero points against the criterion on corrective action plans, as they fail to provide sufficient information and transparency regarding these plans and their implementation.

At the bottom of the assessment sits GSCC, scoring just 3%. Credit was awarded only for the requirement for participating steel companies to establish science-based emissions targets that align with a 1.5°C pathway. The ICMM's Performance Expectations Validation process also received an extremely low score - meeting only 16% of the minimum criteria.

*Teck Resources' Highland Valley Copper mine in B.C.  
Credit: Teck Resource.*



**ASSESSMENT**

Scheme has made progress in some areas but fails to meet multiple criteria for effective governance, auditing and / or accreditation against its standard

**OVERALL SCORE**

**4.75**

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	1	<p>There is some representation of rights-holders/civil society on the governing board of the ASI. However, the governance of the initiative does not guarantee affected rights-holders and their representatives equal decision-making power, as they make up only 2 out of 8 positions on the board.<sup>7</sup></p> <p>The ASI also has a multi stakeholder standards committee, responsible for standards governance. The committee is composed of 24 people. Presently the committee affords equal decision-making power between civil society and corporate actors.<sup>8</sup> However, there are no guarantees for equal decision-making power in the committee: ASI states that it only “aims to have a 50% non-industry (civil society and Indigenous peoples) participation in the Committee.” ASI’s constitution does not provide any guarantees of equal decision-making power in this committee. Furthermore, the constitution states that civil society members of the ASI only have 30% voting power in General Meetings.<sup>9</sup></p> <p>There is evidence that stakeholders were involved in the process of developing the scheme<sup>10</sup>. The ASI Governance Handbook states that the Board oversees a framework for meaningful engagement with stakeholders.<sup>11</sup></p>
Credible audits and accreditation	1	<p>The ASI standard requires an independent third-party assessment is conducted by an external Qualified Specialist(s).<sup>12</sup> Provisional Certification requires a site-based Surveillance Audit within six months of previous Audit (page 16, ASI Assurance Manual 2022)</p> <p>The ASI standard requires that the audit process includes participation of impacted rights-holders with an interest in the operation.<sup>13</sup></p>
Transparency of Results	0.5	<p>The ASI publishes summaries of its audit reports on its website. These reports include explanations for findings of conformance or nonconformance against each of ASI’s performance criteria, together with links to supporting evidence. However, the reports do not provide sufficient information on the audit processes, and do not mention which stakeholders were engaged.<sup>14</sup></p> <p>The standard additionally requires that a summary of the assessments be shared with Affected Populations and Organisations<sup>15</sup>. More detailed or complete audit reports are not provided to impacted rights-holders or other stakeholders.</p>
Corrective Action Plans	0	<p>ASI requires members to develop CAPs for all non-conformances identified during an audit. In cases of major non-conformances, provisional certifications are issued.</p> <p>ASI’s Assurance Manual lists several factors that members should take into account when establishing the proposed corrective actions, but does not require stating an associated timeframe within which the non-conformances should be addressed.</p> <p>The Assurance Manual does not require the results of CAPs to be disclosed publicly and there is no evidence that the ASI standard for CAPs requires rights-holders to be involved in either the development, implementation or monitoring of the plans.<sup>16</sup></p>
Effective Grievance Mechanism	0.5	<p>The ASI has established mechanisms to receive complaints / grievances via email or via the external EthicsPoint online platform. However, there is no evidence that complainants have access to an independently managed grievance process.</p> <p>Adequate details are provided regarding how the grievance mechanism is made accessible: the mechanism is accessible in multiple languages and ASI states that it will generally waive external costs incurred for Indigenous Peoples organizations, small civil society groups or affected communities. It also states that it may provide financial and technical support to allow complainants to properly prepare and participate in the complaints process. The ASI also commits to disclosing details of any complaints made, as well as outcomes as and when they are made. The ASI publishes on its website information on the grievances received and remedial action taken in response.<sup>17</sup></p>
ISEAL compliance	1	<p>The Aluminium Stewardship Initiative is Iseal code compliant.<sup>18</sup></p>
Credible standard criteria	0.75	<p>The ASI accreditation requires the establishment of a GHG Emissions Reduction Plan and ensure a GHG Emissions Reduction Pathway consistent with a 1.5oC warming scenario, using an ASI endorsed methodology when available. (page 17 of ASI Performance Standard.</p> <p>The standard requires FPIC (Page 26 of the ASI Performance Standard).<sup>19</sup></p> <p>The certification is contingent upon adherence to the ILO core Conventions (page 29 ASI Performance Standard.<sup>20</sup></p> <p>The standard does not require alignment with the UN Guiding Principles on Business and Human Rights in its totality. The standard stipulates that adherence is necessary in ways appropriate to its size and circumstances. However, does set a number of minimum aspects of the UNGP’s required for alignment.<sup>21</sup></p>





**ASSESSMENT**

Flawed scheme that fails to meet most of the minimum criteria for governance, auditing and / or accreditation

**OVERALL SCORE**

0.25

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	0	Insufficient. The Global Steel Climate Council (GSCC) is a non-profit association organized to advance climate strategy by establishing standards and advocating for carbon emissions reductions by members of the steel industry. The GSCC includes more than 30 international producing members and supporters who are steel manufacturers, trade associations, end users, scrap metal suppliers and non-governmental organizations. Participation is almost entirely by industry groups. The description mentions the inclusion of NGO's but there is not formal process of stakeholder engagement.
Credible audits and accreditation	0	Insufficient. The certification process is achieved through self-assessment with third-party verification, however no additional details are provided regarding the third party verification process. There is no evidence certification requires site-level verification. <sup>22</sup>
Transparency of Results	0	The scheme has no requirements with regards to transparency of audit / certification results.
Corrective Action Plans	0	There is no public disclosure relating to Corrective Action Plans necessary to achieve certification and no assessment of whether CAPs have been implemented.
Effective Grievance Mechanism	0	There is no evidence of a functioning grievance, complaints or issue resolution mechanism
ISEAL compliance	0	GSCC is not an ISEAL community member or a code compliant member
Credible standard criteria	0.25	Steel companies participating in this standard are required to establish science-based emissions targets that align with achieving the 1.5°C scenario by 2050. <sup>23</sup> There is no evidence the GSCC standard adheres to the UN Guiding Principles on Business and Human Rights, the ILO Core Convention on the Five fundamental principles and rights at work with UNDRIP.



**RESPONSIBLE MINERALS INITIATIVE (RMI) / RESPONSIBLE MINERALS ASSURANCE PROCESS (RMAP)**

**ASSESSMENT**

Scheme has made progress in some areas but fails to meet multiple criteria for effective governance, auditing and / or accreditation against its standard

**OVERALL SCORE**

**3.75**

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	1	<p>The RMI Steering Committee is the overarching governance body of the RMI and consists of consists of 11 voting positions and 3 ex-officio nonvoting positions - including representatives from civil society, downstream companies and upstream auditees. Civil society groups and / or affected rights-holders represent less than 50% of the steering committee (only 3 positions of the 11) and therefore do not maintain equal decision-making power overall with industry. There is however minority representation of civil society on the steering committee.</p> <p>RMI also has a multi-stakeholder Standards Committee, that includes CSO and rights-holder participation. However, there are no requirements for equal representation and / or decision-making power between civil society and industry on this committee.<sup>24 25</sup></p>
Credible audits and accreditation	0.5	<p>The RMAP certification does initially require third party audit of practices, including site-level verification. Annual audits are also required unless the audit company is accepted into the Risk-Based Audit Program, in which case the frequency decreases.<sup>26</sup> The company does have a mechanism to engage external stakeholders in the development and oversight of the scheme.<sup>27</sup> However, it is unclear if the certification process requires the participation of affected rights-holders.</p>
Transparency of Results	0.5	<p>The RMI has an audit platform, which makes assessment summary audit reports readily available to external stakeholders.<sup>28</sup> However, this platform does not make the detailed results of audits, information on the audit processes and findings of noncompliance readily available to impacted rights-holders and other stakeholders.</p> <p>RMI also requires RMAP auditees to publish auditor validated OECD Step 5 due diligence reports, including relevant information regarding RMAP assessment and company sourcing practices.</p>
Corrective Action Plans	0.5	<p>The status of all CAPs are disclosed, along with a description of the non-conformances needing to be addressed.<sup>29</sup></p> <p>However, there is no evidence that the CAPs developed to address instances of non-conformance identified by an independent third party RMAP assessment require rights-holders to be involved in the development, implementation or monitoring of the plans.<sup>30</sup></p> <p>More broadly RMI requires affected stakeholders to be involved in the development and implementation of company-level risk management plans, but this is outside the scope of this criteria.<sup>31</sup></p>
Effective Grievance Mechanism	0.5	<p>The RMI has its own grievance mechanism<sup>32</sup> and also jointly facilitates the Mineral Grievance Platform (<a href="https://mineralsgrievanceplatform.org/">https://mineralsgrievanceplatform.org/</a>) for grievances related to smelters and refiners, including those that have participated in the Responsible Minerals Assurance Process.</p> <p>Both mechanisms are internally facilitated, however there is an Independent Review Committee, made up of three independent experts from academia, a consulting firm, and the auditing and assurance sector. This committee is responsible for overseeing grievances when they relate to RMI's operations and program, and/or when there is potential or actual conflict of interest.</p> <p>RMI provides a summary of grievances received in its annual report, including information on the number of grievances received, whether they relate to RMAP-participating smelters or refiners, and the types of issues raised. However, the scheme does not disclose information on the specific remedial actions taken or the outcomes of the grievances raised. The Minerals Grievance Platform also hosts public statements related to grievances received by the platform, but these have not been updated since 2020 - despite RMI's annual report stating that this platform received seven new grievances in 2022.</p> <p>No additional information is provided regarding the measures taken to ensure the grievance mechanism is accessible or to ensure aggrieved parties have access to information, advice or expertise.<sup>33</sup></p>
ISEAL compliance	0.5	<p>The RMI is an initiative of the the Responsible Business Alliance (RBA). The RBA is an ISEAL subscriber, and through this subscription the RMI is working toward achieving full ISEAL membership.<sup>34</sup></p>
Credible standard criteria	0.25	<p>There is evidence that the RMI and associated certification has been developed to align with the UNGP's.<sup>35</sup></p> <p>However, the RMAP Standard was designed to focus on the OECD Due Diligence Guidance for Minerals Annex II risks, and so does not reference the ILO Decalaration, UNDRIP or the Paris agreement.</p> <p>Separately, RMI has an ESG Standard<sup>36</sup> and a Risk Readiness Assessment standard<sup>37</sup> which are broader in scope and have criteria on human rights, environmental issues and GHG emissions, workers' rights and indigenous rights. However, conformance with these criteria are not a requirement for RMAP smelter/refiner conformance and so they have not been incorporated into this analysis on the RMAP Standard. They may be included as separate assessments in future editions.</p>



**ASSESSMENT**

Flawed scheme that fails to meet most of the minimum criteria for governance, auditing and / or accreditation

**OVERALL SCORE**

1.25

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	0	Insufficient. Affected rights-holders, their representatives, or civil society organizations are not afforded equal or any meaningful decision making power. The management team is comprised of entirely executive directors. <sup>38</sup> Additionally, there is no evidence of structured stakeholder engagement in the development of the standard.
Credible audits and accreditation	0.5	Partial. The ICMM scheme mandates independent, third party audit of practices, including site-level verification. However it is not clear that participation of impacted rights-holder is required as part of the process, although it is noted that the GRI Principle for Stakeholder Engagement (GRI 101) and disclosures regarding stakeholder engagement (GRI102-40, 102-42 and 102-44) are relevant as input for the determination of material sustainability risks and opportunities. (ICMM Assurance and Validation Procedure 2023. <sup>39</sup>
Transparency of Results	0	The ICMM does not publish, or require that its members publish, the overall result of the accreditation process.
Corrective Action Plans	0	Insufficient. The ICMM standard does not reference corrective action plans, or equivalent, and therefore includes no requirement that the results of all CAPs must be disclosed publicly (initiatives must mandate the description of the non-conformances needing to be addressed within an associated time-frame in order to be considered sufficient).
Effective Grievance Mechanism	0	ICMM provides guidance on developing and implementing a grievance mechanism to its members. Performance expectation 9.3 sets out requirements for mines undergoing an assessment to maintain an effective grievance mechanism. The expectation describes the mechanism as being aligned with the UN Guiding Principles on Business & Human Rights. <sup>40</sup> ICMM itself does not maintain a centralized grievance mechanism and there is no disclosure relating to recent grievances raised and the remedial action taken in response.
ISEAL compliance	0	ICMM is not an ISEAL community member or a code compliant member
Credible standard criteria	0.75	<p>Performance Expectation 6.5, requires the setting of scope 1 and 2 targets to build pathways to achieving net zero by 2050.<sup>41</sup></p> <p>Performance expectation 3.1 is for companies to support the UN Guiding Principles on Business and Human Rights by developing a policy commitment to respect human rights, undertaking human rights due diligence and providing for or cooperating in processes to enable the remediation of adverse human rights impacts that members have caused or contributed to.<sup>42</sup></p> <p>Although the ICMM performance expectations do not explicitly reference the ILO Core Convention on the Five fundamental principles and rights at work, expectation 3.4 includes each of the ILO principles.<sup>43</sup></p> <p>Adherence with UNDRIP, ILO 169 and FPIC is not assessed explicitly as part of the certification process. However, principle 3.6 &amp; 3.7 aligns broadly with UNDRIP and FPIC as it relates to indigenous peoples.<sup>44</sup> During 2023 the ICMM released a position paper Indigenous Peoples and Mining (2023, page 3)<sup>45</sup> which references UNDRIP, ILO 169 and FPIC but this is not included in the Mining Principles assessment criteria.</p>

**ASSESSMENT**

Robust scheme overall that still has some shortcomings but meets nearly all of the minimum criteria for governance, auditing and / or accreditation against its standard

**OVERALL SCORE**

7

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	2	<p>IRMA is governed by a Board of Directors with two representatives from each of six sectors: Mining companies; Companies that purchase mined materials to make other products; Non-governmental organizations; Affected communities; Organized labor; Investment and finance. Civil society organizations and rightsholders are therefore guaranteed adequate representation and decision-making power on the governing body of accreditation scheme.<sup>46</sup></p> <p>Rightsholders are involved in the process of designing the scheme. The IRMA stakeholder Forum is an electronic forum open to all interested parties to provide the opportunity to review and comment on the development of the IRMA standard.<sup>47</sup></p>
Credible audits and accreditation	1	<p>Mines must undergo independent, third-party audits. <sup>48</sup></p> <p>The IRMA audit process the audit process includes participation of impacted rights-holders.<sup>49</sup></p>
Transparency of Results	1	<p>IRMA requires the full results of audits, information on the audit processes and findings of noncompliance to be made readily available.<sup>50</sup></p>
Corrective Action Plans	1	<p>The certification scheme standard for corrective action plans (CAPs) affords meaningful involvement of rights-holders in the development, implementation and monitoring of the plans given its overall governance structure. CAPs are also disclosed as part of the standards disclosure requirements (Assessment Manual for Mines, p23, 2022). <sup>51</sup></p>
Effective Grievance Mechanism	0.5	<p>The IRMA complaints mechanism is not independently facilitated. However the Initiative does plan to engage Assurance Services International (ASI) in 2024 to “provide independent oversight” of their complaint/grievance resolution system, although this is not yet fully operational.</p> <p>The company does allow for complaints to be made in multiple languages and can be registered anonymously.<sup>52</sup></p> <p>IRMA’s Issue Resolution System states that “summaries of the issues and of the resolutions and the total number of raised and resolved issues shall be published on the IRMA website.”</p>
ISEAL compliance	0.5	<p>IRMA is an Iseal member but not Iseal code compliant.<sup>53</sup></p>
Credible standard criteria	1	<p>The IRMA standard is contingent on Free, Prior and Informed Consent (FPIC) (page 49 V1 IRMA Standard)</p> <p>The IRMA standard is aligned with the ILO Core Conventions<sup>54</sup></p> <p>The IRMA standard was designed to align with UNGP.<sup>55</sup></p> <p>The IRMA standard requires a policy (or equivalent) is in place that includes a commitment to manage energy consumption and greenhouse gas emissions in a manner that aligns with the goals of the Paris Agreement.<sup>56</sup></p>

## ASSESSMENT

Scheme has made notable progress in meeting most of the minimum criteria but has some significant shortcomings

## OVERALL SCORE

5

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	1	<p>The ResponsibleSteel Constitution states that the Board will be made up of four directors from business members, up to four from civil society members and up to three independent directors. Currently it includes three business, four civil society and three independent representatives. Resolutions can only be passed if at least 66% of the votes cast are cast in favour of it and at least 1 Director from each of the category votes in favor. Overall the governance of the board does not guarantee affected rights-holders or their representatives equal representation and decision-making power.<sup>57</sup></p> <p>Civil society members do have equal (50%) decision-making power (voting rights) alongside industry members on the ResponsibleSteel Standard, including new and revised editions of the Standard(s).<sup>58</sup></p> <p>There is evidence that stakeholders were involved in process of designing the accreditation.<sup>59</sup></p>
Credible audits and accreditation	1	<p>“The ResponsibleSteel certification standard requires third party audit of processes, including site visits. Rightsholder and broader stakeholder engagement also forms part of the audit process.<sup>60</sup></p>
Transparency of Results	0.5	<p>“ResponsibleSteel publishes summary reports of the audits on its website. These public summary reports provide information on the audit process, including which stakeholders were engaged and how. However, the reports do not disclose explanations regarding the findings of conformance or non-conformance against the standard’s criteria.<sup>61</sup></p>
Corrective Action Plans	0.5	<p>ResponsibleSteel requires companies to develop corrective action plans for all non-conformances identified during an audit. Certificates are not issued when major major non-conformities are identified, until a special audit verifies that they have been addressed within 6 months of the major non-conformities being raised.</p> <p>ResponsibleSteel’s Assurance Manual and Implementation Instructions detail criteria on corrective action plans required in cases of non-conformances. These CAPs have to meet SMART criteria and are therefore time-bound.</p> <p>The results of corrective actions are included in surveillance audit reports, conducted 12 – 18 months after the initial audit and published on Responsible Steel’s website.</p> <p>There is no evidence of a requirement for affected rights-holders to be involved in the development, implementation and monitoring of the corrective action plans.<sup>62</sup></p>
Effective Grievance Mechanism	0.5	<p>ResponsibleSteel has an Issues Resolution System which serves as a grievance / complaints mechanism through which issues with ResponsibleSteel’s certification process can be escalated.</p> <p>Issues and complaints can be raised in multiple languages, and ResponsibleSteel states that the complainant can ask for the support of an advisor during the process.</p> <p>The Issues Resolution System requires ResponsibleSteel to publish “a summary of the issues and of the resolutions and the total number of raised and resolved issues” on its website. However, no grievances about ResponsibleSteel’s certification process have been made through the mechanism.</p> <p>The complaints process is internally managed.<sup>6364</sup></p>
ISEAL compliance	0.5	<p>ResponsibleSteel is an Iseal community member but not listed as code compliant.<sup>65</sup></p>
Credible standard criteria	1	<p>Criterion 10.1 of the standard requires the site’s corporate owner to have defined and be implementing a long- and medium-term strategy to reduce its greenhouse gas (GHG) emissions to levels that are compatible with the achievement of the goals of the Paris Agreement, with an aspiration to achieve net-zero GHG emissions through work with policy makers and others.<sup>66</sup></p> <p>The standard has been designed to align with Internationally recognised human rights, as laid out in the International Bill of Human Rights and in the ILO Declaration on Fundamental Principles and Rights at Work. The standard also references alignment with The UN Guiding Principles on Business and Human Rights.<sup>67</sup></p>





**ASSESSMENT**

Scheme has made progress in some areas but fails to meet multiple criteria for effective governance, auditing and / or accreditation against its standard

**OVERALL SCORE**

4

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	0.5	<p>The Board of Directors of the Copper Mark includes three industry representatives, three non-industry representatives and the Copper Mark Executive Director. However, there are no guarantees in CopperMark’s governance documents that non-industry representatives must include representatives from civil society and / or rights holders.<sup>68</sup></p> <p>Copper Mark also maintains an Advisory Council, that includes but does not guarantee representation from civil society, which advises the Copper Mark Board of Directors by providing recommendations on the implementation of the Copper Mark’s vision and mission.<sup>69</sup></p> <p>Beyond the Advisory Council, there is evidence of additional mechanisms for structured stakeholder engagement in the development of the standard.<sup>70</sup></p>
Credible audits and accreditation	1	<p>CopperMark requires that all applicable criteria are independently assessed at the site level.<sup>71</sup></p> <p>The process includes interviews with relevant stakeholders, such as Indigenous Peoples groups and local communities, NGOs, community organizations, upstream supply chain actors, and government entities.<sup>72</sup></p>
Transparency of Results	0.5	<p>CopperMark provides assessment summary reports which are made readily available<sup>73</sup>. The scheme only requires partial disclosure or a summary of audit findings to be made public, indicating the company’s performance against key criteria but without further explanation.</p>
Corrective Action Plans	0.5	<p>CopperMark discloses details about how Improvement Plans are developed and monitored, included timebound deadlines for alignment.<sup>74</sup></p> <p>The audit result summary includes a description of the non-conformances needing to be addressed within an associated time-frame.<sup>75</sup> However, there is no evidence that the standard requires rights-holders to be involved in the development, implementation and monitoring of the plans.</p>
Effective Grievance Mechanism	0	<p>The grievance mechanism is independently facilitated and independently reviewed if the complaint relates to CopperMark itself, there is adequate disclosure as to how the grievance mechanism is accessible to all stakeholders, including an explanation that grievances may be submitted in the local language of the complainant. CopperMark also specifies that access to support, advice or expertise may be provided to complainants and that “it may cover all reasonable costs where costs would prohibit the complainant from utilizing the Grievance Mechanism, for example when the complainant is an individual, community group, or NGO.”<sup>76</sup></p> <p>However, there is inadequate disclosure regarding the operation of this grievance mechanism: although CopperMark states that it will publish annually “an aggregated summary of grievances,” its 2020, 2021 and 2022 annual reports simply state that CopperMark has received one grievance per year but provides no additional information.</p>
ISEAL compliance	0.5	<p>The Copper Mark is an ISEAL Community Member.<sup>77</sup></p>
Credible standard criteria	1	<p>Participating sites in the CopperMark initiative are assessed against the RMI’s Risk Readiness Assessment Criteria.<sup>78</sup></p> <p>The RRA Criteria references alignment with The United Nations Guiding Principles for Business and Human Rights, The International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work (each of the five principles are included and the Declaration is also mentioned) and the UN Declaration on the Rights of Indigenous Peoples, with specific references to respecting the right to free, prior and informed consent.</p> <p>There is also a requirement for sites to reduce greenhouse gas emissions “at a pace and scale consistent with mitigation pathways that meet the goals of the Paris Agreement to curb global temperature rise to 1.5 °C above pre-industrial levels”.<sup>79</sup></p>



**TOWARDS  
SUSTAINABLE  
MINING**

**ASSESSMENT**

Scheme has made progress in some areas but fails to meet multiple criteria for effective governance, auditing and / or accreditation against its standard

**OVERALL SCORE**

**3**

CRITERIA	SCORE	ASSESSMENT
Multi-stakeholder governance	0.5	<p>Each TSM partner must establish an independent, multi-interest advisory body, made up of 12 to 15 individuals from Indigenous groups, communities where the industry is active, to support the governance and implementation of TSM.<sup>80</sup></p> <p>However, as this is an advisory body – not a formal governance body – it does not meet the criterion of multi-stakeholder governance. The Board of Directors is composed only of representatives from the mining sector.</p> <p>There is evidence of structured stakeholder engagement in the development of the standard. The development of TSM protocols includes members of the national mining association and the multi-interest advisory body working collaboratively to develop a new protocol or revise an existing one.<sup>81</sup></p>
Credible audits and accreditation	1	<p>TSM requires third party audit of practices, including site-level verification.<sup>82</sup></p> <p>The assessment process includes interviews with the facility Community of Interest Advisory Panel (COI) and therefore it is considered the audit process includes participation of impacted rights-holders.<sup>83</sup></p>
Transparency of Results	0.5	<p>The scheme only requires partial disclosure or a summary of audit findings to be made public, indicating the company's performance against key criteria but without further explanation.<sup>84</sup></p>
Corrective Action Plans	0	<p>Insufficient. Currently mining associations in Canada and Finland disclose their TSM performance reports<sup>85</sup>, while TSM Canada now publishes verification reports<sup>86</sup>. However, this does not appear to be a requirement for all TSM Partners and these summary reports do not provide an adequate description of the non-conformances needing to be addressed within an associated time-frame</p>
Effective Grievance Mechanism	0.5	<p>TSM has an internally facilitated “Issues Resolution Policy and Process” which serves as the grievance mechanism for the scheme. The policy states that an annual summary of grievances received through this mechanism, “including data on the number, type, and status of issues submitted” will be published on the Mining Association Canada website. However, no data is currently provided as no grievances have been received through the mechanism to date. There is no additional information provided on accessibility measures for the grievance process.<sup>87</sup></p>
ISEAL compliance	0	<p>TSM is not an ISEAL community member or a code compliant member.</p>
Credible standard criteria	0.5	<p>The TSM includes a climate change protocol which requires companies to make commitments to climate action consistent with the ambitions of the Paris Agreement.<sup>88</sup></p> <p>The standard includes a protocol referencing ILO 29, 138 and 182 only. The standard's Indigenous and Community Protocol references UNDRIP and FPIC, providing a series of progressive requirements on shared decision-making processes with Indigenous Peoples. However, the overall requirement is only for mines to aim to obtain and maintain FPIC, and the minimum (level B) assessment criteria of the TSM does not include sufficient provisions to ensure effective community participation or FPIC.<sup>89</sup></p> <p>The standard does include reference to UN Guiding Principles on Business and Human Rights.<sup>90</sup></p>

## Conclusions and recommendations for action

The analysis above underscores the extent to which auditing and accreditation schemes vary in their creation and management. Ultimately, mandatory legal frameworks, accompanied by strong enforcement capacity, remain the gold standard in ensuring responsible sourcing and supply chains that don't negatively impact Indigenous Peoples, communities, workers and the environment.

Where auditing and accreditation schemes are governed by multiple stakeholders, and include independent, publicly available, third-party auditing, they can be a useful tool for assessing the performance of a project at any given time, as they provide a useful data point for downstream companies, purchasers and policy makers and investors.

Automakers and other downstream companies, investors, policymakers and the schemes themselves should therefore make a concerted effort to drive up standards as they relate to third-party assurance and accreditation systems so that they can fulfill their potential of driving meaningful improvements in company practice.

### To upstream companies:

- Select auditing and accreditation schemes with the most robust standard in your industry with a time bound commitment to undergo their process and progressively improve your performance.
- Involve rights holders and affected parties in the assessment of your company's operations.
- Develop an independent and transparent grievance mechanism that is accessible to rights holders and affected parties beyond the auditing or assessment period.
- Use your influence as members of third-party schemes to drive up standards and address the shortcomings revealed by this assessment.

### To downstream companies and purchasers:

- Develop robust due diligence systems for your supply chain with the results from auditing and accreditation schemes forming one data point on its impact to rights holders.





- Leverage your influence and communicate your expectations that your suppliers should undergo auditing from the most robust standard in the relevant sector.
- Publicly disclose all the suppliers (from tier 1, 2, and 3) in your supply chain including their percentage share of the supply chain.
- Develop an independent, accessible grievance mechanism through which rights holders affected by the operations of your suppliers can file complaints.

#### **To schemes:**

- Ensure credible standard setting and implementation through systems of multi-stakeholder governance that provide guarantees of equal decision-making power for affected rights-holders, workers and civil society organizations alongside industry stakeholders.
- Align the performance requirements of the scheme with international human rights and environmental standards, providing adequate detail and breaking down key issues into specific criteria against which companies' policies and practices can be assessed.
- Ensure auditing and accreditation processes are rigorous, independent and transparent, with adequate requirements for participation from and consultation with local communities, workers, and other key stakeholders.
- Develop effective, independent and accessible grievance mechanisms, that are aligned with the Effectiveness Criteria of the UNGPs, to evaluate and adjudicate complaints related to audits and their outcomes.
- Implement adequate measures to ensure that participating companies implement transparent corrective actions to address non-conformities with the standard and any environmental or human rights harms identified during audits.
- Develop adequate mechanisms for ensuring the continuous improvement of the standard and its implementation.

#### **To policymakers:**

- Introduce and implement strong laws and regulations that make it mandatory for companies to undertake human rights and environmental due diligence, particularly as the battery minerals industry rapidly grows.
- Set clear guidelines and expectations surrounding the reliance of auditing and accreditation schemes by companies including a requirement that the scheme have multi-stakeholder governance, that the results of the audit be transparent and that rights holders be included in the process.

#### **To investors:**

- Communicate your expectations that companies develop robust due diligence systems for preventing, mitigating and remedying the impact of their supply chains.
- Develop investment criteria that incentivises the adoption of the most robust standards.
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# Lead the Charge

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