

We had a look at sections D.10 Security and D.11 Grievance and Remedy. Both topics are very complex, and one could have a stand-alone index on any one of them, which makes the task of including them in a short and precise manner a difficult task. Mindful of this complexity, we have the following comments and suggestions for your consideration:

D.10 Security

- There seems to be an overlap between the Indicators 10.1 and 10.2. It is not immediately apparent how “measures to minimize the risk of human rights abuses linked to its security management” are separate to “specific systems in place for managing security risks for workers and communities”.
- At 10.1, are you referring to security management onsite, or rather to a global, company-wide management system? If the latter, it seems that any security management measure to regulate engagement with security actors fulfils 10.1’s requirements, while global measures may be highly inadequate for some of the company’s operations in complex environments.
- 10.2 does in its current formulation not require any ‘specific system’ to be adequate for the situation on the ground (or effective), it merely requires any system to ‘be in place’. This seems to be a weak indicator, as assumingly any company can provide some kind of evidence for a security system to be ‘in place’.
- To address the overlap and ambiguity of the current indicators, we would suggest some more concrete formulations and examples – which nonetheless apply to and are necessary in all contexts and operations. For instance:
 - When operating in conflict-affected and high-risk areas, the company has conducted a thorough risk and impact assessment, which accounted for the needs and rights of vulnerable community groups (e.g. children and women). Outcomes/Results of this risk and impact assessment have informed the development of specific system in place for managing security and human rights risks.
 - The company ensures that decisions on security arrangements that impact local stakeholders are taken in coordination with the community relations department (or similar).

D.11 Grievance and Remedy

- The difficulty with measuring grievance mechanism is that the absence of complaints does not reveal much about the mechanism itself. Either there are no complaints or communities decide not to use the mechanism, because they do not trust it. To really make a distinction between the latter one would have to engage with the communities and inquire about their opinion of the grievance mechanism, rather than to rely on ‘public reports on the effectiveness of the ... mechanism’ (11.2).

- If it is unfeasible for the RMI team to engage with communities directly, it may be possible to rephrase an indicator to state that “The company has formal community grievance mechanisms in place, which **has been developed in coordination with affected stakeholders** and allows all vulnerable groups to raise concerns in an easily accessible manner ...
- Again there seems to be an overlap between ‘public reports on the effectiveness of the operational ... mechanisms’ (11.2) and ‘company can demonstrate implementation of a grievance mechanism’ (MS3). However, it is not clear to me if ‘MS3’ is an indicator as well or something else.