Jan Boon FaciliTech International Canada

I read the draft report with great interest and I commend you for your thorough work. Below I have listed the points that I want to highlight. I have also attached a copy of the document into which I have inserted additional comments, many of which are just editorial.

Page 8

It may be difficult to determine what society expects

Page 9

Figure 1. Add academia. Do the governments shown include all levels of government?

Page 15

Box 1. Did you exclude e3Plus (PDAC) because it focuses on exploration?

Page 17

Engagement: ...and also to obtain relevant information. The company is one node in a web of relationships, and information and trust, respect, etc. diffuse in all directions through this web

Page 20

Scoring, weighting and aggregation: I feel somewhat uneasy about scoring. There is a significant risk of missing what is really going on and of developing a box-ticking mentality that can defeat the purpose. I suggest that narrative be an important component of the evaluation

Page 21

Company reporting: I understand why the approach may not include site visits and interviews, as this could become too expensive. On the other hand, "paper is patient" and important clues can be easily missed. The crucial role of human relationships will not receive sufficient attention. I also do not see any mechanism for reporting by communities and levels of government, a serious omission.

Page 26

D1: The absence of community and government input into the evaluation is a major weakness of the proposed approach

Page 27

D5.1: These people need to be involved in the evaluation

Page 36, B.3.1, just before B.4, beneficial ownership: The term "social licence to operate" has come under fire and rightly so. Many companies still see it as a "licence" and act accordingly. In reality it is an ongoing relationship that has to be continually maintained by the parties involved

Page 40

Lifecycle management: The chain of custody has to be carefully managed and an indicator is needed. I know of various cases in which the chain of custody was not managed properly with disastrous consequences including loss of life.