March 29, 2017

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Dear Ms. De Villiers-Piaget,

Thank you for the opportunity to provide comments on the Responsible Mining Index (RMI) Draft Methodology. As you are aware, the Mining Association of Canada (MAC) has demonstrated leadership in the development and implementation of responsible mining practices that pertain to both the environmental and social aspects of mining. Over the last 17 years of developing and implementing the Towards Sustainable Mining (TSM), MAC has gained considerable experience in managing an auditable standard. Many of the comments below are based on this experience.

To begin with, MAC would like to support the analysis undertaken by ICMM. The notion of evaluating each of the 75 RMI draft indicators based on the four criteria identified by ICMM is a practical and effective way to strengthen the RMI methodology and we encourage you to take ICMM's analysis into account as you prepare the next version of the RMI methodology.

MAC's comments on the RMI are primarily focused on two areas: 1) identifying additional areas of alignment between RMI and TSM, and 2) elaborating on the fourth criterion identified by ICMM, comparability across companies.

Section 1 - Identifying additional areas of alignment between RMI and TSM

Given the proliferation of mining related standards, RMI's efforts to connect its methodology to existing standards is helpful. Through our review of the RMI draft methodology MAC has identified several areas of strong alignment between RMI Indicators and TSM indicators. Given this alignment, MAC is taking this opportunity to propose that RMI recognize certain levels of performance in specific TSM indicators as evidence that companies and mine sites have

addressed corresponding RMI indicators. A summary of these alignments can be found in the summary table in Appendix 1.

In addition, given TSM's unique and tested facility level focus, MAC believes TSM can offer RMI a useful answer to question raised in the RMI consultation document regarding "the selection of a reasonably focused set of indicators for application at mine-site level…". As is articulated below, TSM already addresses MS 1, MS 3 and MS 5 and TSM's approach could be used as a template for the other MS 2 and MS 4.

Below is an indicator-by-indicator comparison of what is addressed in each RMI indicator and how it corresponds to relevant TSM indicators. Note that this submission only addresses RMI indicators that are aligned with TSM indicators and is silent on the other RMI indicators. As such, the following indicators are addressed in numerical order below:

- D.1 Community and Stakeholder Engagement
- D.5 Indigenous Peoples
- D.11 Grievance and Remedy
- E.2 Occupational Health and Safety
- F.2 Tailings Management
- F.6 Biodiversity
- F.7 GHG Emissions and Energy Efficiency
- F.9 Emergency Preparedness

D.1 Community and Stakeholder Engagement
The [TSM Aboriginal and Community Engagement Protocol](#) is substantially aligned with both RMI Community and Stakeholder Engagement indicators (D.1.1 and MS1).

The draft methodology refers to stakeholder analysis and engagement planning, disclosure and dissemination of information, consultations related to project risks, impacts and mitigation strategies, community participation in project monitoring, a mechanism for raising complaints and ensuring remedy, and reporting to stakeholders. Further in the commentary, additional elements of engagement are also listed, including providing communities with timely and full information, collaborating with stakeholders to design culturally appropriate and accessible engagement processes, building stakeholder capacity and removing barriers to participation.

The TSM Aboriginal and Community Outreach Protocol includes the following criteria that directly relates to the above engagement elements:

Indicator 1
Level A:

- *A documented system is in place for Community of Interest (COI)identification at the facility level that includes those with challenging interests.*

Indicator 2
Level A:
Documented COI engagement and dialogue systems are in place.
- *The facility provides assistance to ensure COI are able to participate in engagement and dialogue processes, where appropriate.*
- *Communications are written in the local language for COI (as required) and are written in language that is clear and understandable to COI.*
- *Time is built into processes to allow for meaningful review of proposals by COI.*
- *Relevant materials are provided to COI for review in a timely manner.*
- *Processes are in place to engage with COI on credible risks to the public that are associated with company activities, including tailings management.*

Level AA:
- *COI are invited to provide input to determine the scope of engagement on issues of concern to them, including those associated with identified credible risks to the public such as tailings management.*
- *Processes exist to identify the needs of COI for capacity building to allow them to engage in effective participation on issues of interest or concern to them.*
- *Engagement and dialogue training is provided to designated personnel, including appropriate culturally-specific training.*

Level AAA:
Formal mechanisms or agreements with COI are in place to ensure they can effectively participate in issues and influence decisions that may interest or affect them.
- *The facility has a consistent history of meaningful engagement with COI.*
- *Processes to build the capacity of COI to allow them to effectively participate in dialogue exist.*
- *COI contribute to periodic reviews of engagement processes to allow continual improvement.*

By measuring the above criteria, the achievement of Level A in Indicator 1 and Level AAA in Indicator 2 of the TSM Aboriginal and Community Outreach Protocol should be considered as evidence that a company has addressed RMI indicator D.1.1. Additionally, mine sites that are being individually assessed for MS 1 and have achieved Level AAA for Indicator 2 should be deemed to have met the requirements.

D.5 Indigenous People

The [TSM Aboriginal and Community Outreach Protocol](#) is substantially aligned with RMI indicator D.5.1 which measures whether *the company identifies all indigenous peoples' groups located near current and potential mines and associated facilities, including those in potential areas to be affected by the mining operation (e.g. mine tailings dams). It identifies their particular rights, interests and needs through inclusive meaningful participation.*

The TSM Aboriginal and Community Outreach Protocol addresses this indicator through a combination of criteria found in indicators 1 and 2. The first indicator focuses on Community of Interest Identification. At Level A, a facility is required to have *a documented system in place for COI identification at the facility level that includes those* with challenging interests. While this indicator does not specifically reference indigenous people, it requires the mine to have a system in place to identify who their stakeholders are and if there are indigenous people 'located near current and potential mines and associated facilities' as indicated in the RMI methodology they would be included in this identification process.   The TSM protocol refers to stakeholders that are '…affected or perceived to be affected by their operations or who have a genuine interest in the performance and activities of a company and/or operation.'

The second part of the RMI indicator requires that the company identifies particular rights, interest and needs through inclusive meaningful participation. In this case, a company would need to demonstrate that it is meeting relevant TSM criteria at Levels AA and AAA:

- Level A Criteria - *Designated employees have been informed of and trained in meeting Aboriginal consultation requirements, including those procedural aspects that have been transferred to the proponent by any applicable government.*
- Level AA Criteria - *Traditional knowledge is sought, as appropriate, from local Aboriginal communities and organizations and is applied to support decisions and inform practices including environmental monitoring.*
- Level AAA Criteria - *Negotiated agreements with Aboriginal peoples are in place for the operations or projects where appropriate.*

By measuring the above criteria, the achievement of Level A in Indicator 1 and Level AAA in Indicator 2 of the TSM Aboriginal and Community Outreach Protocol should be considered as evidence that a company has addressed RMI indicator D.5.1.

D.11 Grievance and Remedy
The [TSM Aboriginal and Community Outreach Protocol](#) is substantially aligned with all three of RMI indicators focusing on grievance and remedy (D.11.1, D.11.2 and MS 3

Indicator 3 in the TSM Aboriginal and Community Outreach Protocol contains the following relevant criteria at Level A:

The facility has a good understanding of COI concerns and consultation requirements and documents them.

- *A complaint and response system is in place with processes for follow-up and tracking.*
- *COI input is considered in decision making.*

D.11.1 measures whether the company has a formal community grievance mechanism in place for affected stakeholders to raise concerns in an easily accessible manner and have them addressed. This is addressed by the first bullet listed above.

D.11.2 requires that the company monitors and publicly reports on the effectiveness of the operational-level grievance and remedy mechanism. The second bullet above is one means of testing the effectiveness of a grievance mechanism in that it provides a mechanism for stakeholders to input into the processes. The reporting element is contained at Level A in indicator 4 of the TSM Aboriginal and Community Outreach Protocol which requires facility level *Reporting on COI engagement and dialogue activities occurs and includes responses to COI on concerns raised by them.*

MS 3 requires that the operating company demonstrate implementation of a grievance mechanism and claimants' effective access to remedy. By measuring the above criteria at a facility level as is required by TSM, the combination of the Level A performance in indicator 3 and indicator 4 are evidence that a mine site subject to MS3 has addressed the requirements.

By measuring the above criteria, the achievement of Level A in indicators 3 and 4 of the TSM Aboriginal and Community Outreach Protocol should be considered as evidence that a company has addressed RMI indicators D.11.1 and D.11.2 and that MS 3 has been addressed on a mine site basis.

E.2 Occupational Health and Safety
The TSM Safety and Health Protocol is substantially aligned with three of the four RMI Occupational Health and Safety indicators (E.2.1, E.2.2 and E.2.3).

E.2.1 – This indicator measures whether the company commits to promoting safe and healthy working conditions. Indicator 1 of the TSM Safety and Health Protocol contains three relevant indicators at Level A:

- *Commitments are defined and authorized by the company's senior management and are consistent with the intent of the MAC Safety and Health Framework.*
- *There is a process in place to ensure that employees, contractors and suppliers who work at the facility are aware of the company's safety and health commitments.*
- *Accountabilities and responsibilities are understood at all levels.*

These criteria clearly evaluate whether the company has a commitment to promoting safe and healthy working conditions and goes a step further to make sure that the company is actively communicating its commitment.

E.2.2 – This indicator measures whether the company has management systems in place which ensure a safe and healthy working environment for employees and contractors. All of the criteria contained at Level A in Indicator 2 of the TSM Safety and Health Protocol are relevant here and add important detail beyond the high-level focus of E.2.2. Level A requires companies to have the following in place:

> *A documented safety and health management system is established, implemented and maintained. At a minimum, it incorporates:*
> - *Objectives and targets, with supporting plans to achieve them;*
> - *Hazard identification, risk assessment (HIRA) and control processes.*
> - *An industrial hygiene program;*
> - *Defined roles and responsibilities for safety and health management;*
> - *Workplace inspections; and*
> - *Maintenance of safety and health records.*
> *Resources are assigned to establish, implement, maintain and improve the safety and health management system and validate effectiveness of controls.*

E.2.3 – This indicator measures whether the company regularly trains and tests its employees in good health and safety practices. The criteria contained at Level A in Indicator 3 of the TSM Safety and Health Protocol are directly relevant to E.2.3 and provide an additional level of detail relevant to whether training systems include key components of good practice:

> *Planned, documented and functional safety and health training program is in place that includes:*
> - *Training needs analysis for employees, including consideration of required skills and competencies, and orientation for employees, on-site contractors and visitors. The training program is implemented and includes a mechanism for review.*
> - *Training records are maintained.*
> - *Resources are assigned to implement and maintain the training program.*
> - *Trainees are assessed for competency where tasks have safety and health competency-based requirements.*
> - *Trainers are qualified to deliver safety and health training programs.*
> - *Training includes hazard identification and control with a focus on prevention and proactive measures.*

- *A job observation program supports and reinforces training to ensure routine safety checks and coaching are in place to encourage safe behaviour and work practices.*

By measuring the above criteria, the achievement of Level A in indicators 1, 2 and 3 of the TSM safety protocol should be considered as evidence that a company has addressed RMI indicators E.2.1 and E.2.2 and E.2.3. To fully address the RMI Occupational Health and Safety indicators, a company would need to provide additional evidence that they have addressed E.2.4.

F.2 Tailings Management

From the reference to the TSM Tailings Management Protocol Indicator 2 has already been referenced in the draft RMI Methodology, it is apparent that RMI has already recognized that there is alignment. Having said that, based on the information below, RMI should go a step further and recognize Level A achievement in the TSM protocol as evidence that the company has addressed both F.2.1 and F.2.2.

F.2.1 – This indicator focuses on the presence of tailings management systems, including regular internal and external review and assurance processes. While the TSM Tailings Management Protocol 2 is clearly an integral part effective tailings management, it is not sufficient in isolation. We would encourage you to reference the TSM Tailings Management Protocol and the accompanying guides rather than maintain the narrow focus on the second indicator.

F.2.2 – This indicator focuses on tailings design and includes specific references to "preventing seepage and tailings dam failure and to protect the environment and communities from contamination and other impacts, including through the management of risks associated with potential changes." In 2015, MAC struck an independent review task force to review our tailings protocol and guides. The task force developed 29 recommendations to strengthen our tailings standard, all of which have either already been addressed or will have been addressed by June. Many of these recommendations are focused on addressing the intent of this indicator and have resulted in significant enhancements to the Tailings Management Guide. MAC strongly encourages RMI to include a reference to the latest version of the MAC Tailings Management Guide. A draft of the guide has been attached to this submission for your reference and it is anticipated that the guide will be finalized in mid-June, at which time it will be publicly available on the MAC website.

By measuring the criteria contained in the TSM Tailings Management Protocol at a facility level, the combination of the Level A performance in all 5 indicators should be considered as evidence that a company has addressed RMI Indicators F.2.1 and F.2.2.

F.6 Biodiversity

The [TSM Biodiversity Conservation Management Protocol](#) is substantially aligned with RMI indicator F.6.1 on Biodiversity.

The TSM Biodiversity Conservation Management Protocol contains 3 indicators:

1. *Corporate biodiversity conservation commitment, accountability and communications*
2. *Facility-level biodiversity conservation planning and implementation*
3. *Biodiversity conservation reporting*

The first indicator requires companies to put in place a commitment to biodiversity management that is consistent with the [TSM Biodiversity Conservation Management Framework](#) and includes, among other requirements, a commitment that:

> *MAC member companies undertake not to explore or develop mines in World Heritage sites. All possible steps will be taken to ensure that pre-existing operations in World Heritage sites as well as existing and future operations adjacent to World Heritage sites are compatible and co-exist with biodiversity goals.*

Beyond the commitment, The TSM indicators include the following relevant criteria:

> *Indicator 2 – Facility-Level Biodiversity Planning and Implementation*
> *Level A*
> *Facility-level plan or management system to manage significant biodiversity aspects is implemented. Facility-level plan or management system includes, at a minimum, these elements:*
> - *Potential impacts/risks to biodiversity are assessed.*
> - *Specific objectives for significant biodiversity aspects are identified.*
> - *Action plans are developed and implemented to specifically address biodiversity objectives.*
> - *Facility-level personnel have been assigned responsibility for biodiversity conservation management.*
> - *Biodiversity conservation awareness is included in facility training programs for relevant personnel.*
> - *The facility has consulted with and/or engaged key COI (e.g. governments, Aboriginal communities and conservation organizations) regarding biodiversity conservation management.*
> - *Implementation of the facility-level biodiversity conservation plan and progress towards biodiversity objectives are regularly tracked and reported to facility-level senior management.*
>
> *Level AA*

- *Independent verification/review has been conducted of biodiversity conservation management system implementation (internal or external).*

By measuring the above criteria at a facility level, the combination of the Level A performance in indicator 1 and Level AA performance in indicator2 in the TSM Biodiversity Conservation Management Protocol should be considered as evidence that a company has addressed RMI Indicator F.6.1.

F.7 GHG Emissions and Energy Efficiency
The TSM Energy Use and Greenhouse Gas (GHG) Emissions Management Protocol is substantially aligned with RMI indicators F.7.1 and F.7.2. These indicators measure whether companies are measuring and minimizing GHG emissions and energy respectively. In TSM, both energy and GHG performance is addressed through Indicator 3 of the TSM Energy and GHG Management Protocol which requires companies to set and achieve energy and GHG performance targets:

Indicator 3:
Level B
- *Energy and GHG emissions performance targets have been set for the facility and/or the business unit, and performance strategies have been developed that are consistent with energy policy and/or commitments to improve performance.*

Level A
- *Energy and GHG emissions performance targets for the facility and/or business unit are met in the reporting year.*
- *In establishing objectives and targets, the facility or business unit has considered significant energy uses identified in its energy management system as well as its financial, operational and business conditions, legal requirements, technological options, the views of potentially affected parties and opportunities to improve energy performance*

By measuring the above criteria, the achievement of the Level A performance in this indicator in the TSM Energy Use and GHG Emissions Management Protocol should be considered as evidence that a company has addressed RMI Indicator F.7.1 and F.7.2.

F.9 Emergency Preparedness
The TSM Crisis Management and Communications Planning Protocol is substantially aligned with three out of the four RMI indicators under F.9 – Emergency Preparedness.   These RMI indicators measure whether companies have systems in place for emergency preparedness and response plans, whether the company engages with local authorities, workers and communities and whether individual facilities do this as well. The one aspect of F.9 that TSM does not

address is F.9.3 which assesses whether the company makes public all relevant information about financial assurance that is provided for disaster management and recovery.

F.9.1 – This indicator measures whether a company has systems in place for developing and maintaining emergency preparedness and response plans. The first indicator in the TSM Crisis Management and Communications Planning Protocol, *Crisis Management and Communications Preparedness,* is divided into two components, one that measures the presence of crisis preparedness at the corporate level and the other that measures the same at the facility level. For the purposes of equivalency with F.9.1, it is the corporate criteria that are most relevant:

- *Member companies must have in place a crisis management and communications plan.*
- *The CEO has endorsed and demonstrated support for crisis management and communications planning.*
- *Credible threats and risks have been identified for the company and protocols established to address them.*
- *The results of these evaluations have been shared between corporate and operations levels.*
- *A Corporate Crisis Management Team has been established, with defined roles and responsibilities.*
- *A notification mechanism is in place to activate the Corporate Crisis Management Team in the event of a crisis.*
- *A media spokesperson has been assigned and trained.*
- *The Crisis Management and Communications Plan is a controlled document.*
- *All Corporate Crisis Management Team members have been provided the plan and key contact list.*
- *A crisis control centre has been established and equipped.*

F.9.2 & MS 5 – This submission addresses these two indicators together as they address the same thing but from the corporate level and site level respectively whereas TSM Crisis Management and Communications Planning Protocol addresses most of them all at the facility level. These two RMI indicators focus on assessing whether there is engagement with local authorities, workers and communities in developing, communicating and testing the plan. Below are the relevant criteria from the TSM Crisis Management and Communications Planning Protocol:

> *Indicator 1 - Crisis Management and Communications Preparedness*
> - *Mechanisms to alert employees to a crisis and its developments have been established.*
> - *Contact information for key local stakeholders relevant to the credible threats and risks have been prepared*

- *The facility meets annually with senior members of the local emergency response authorities (where they exist).*

Indicator 2 - Review
- *Mechanisms to alert employees to a crisis and its developments are tested at least once per year*

Indicator 3 – Training
- *"Table top" crisis simulation exercises are conducted annually.*
- *A full crisis simulation is conducted every three years.*

In addition to these criteria TSM recently introduced two new criteria in indicator 2 of the Aboriginal and Community Engagement Protocol that are relevant to this issue:

Level A
- *Processes are in place to engage with COI on credible risks to the public that are associated with company activities, including tailings management.*

Level AA
- *COI are invited to provide input to determine the scope of engagement on issues of concern to them, including those associated with identified credible risks to the public such as tailings management.*

By measuring the above criteria, the achievement of 'Yes' in the three TSM Crisis Protocol indicators and a Level AA in indicator 2 of the TSM Aboriginal and Community Engagement Protocol should be considered as evidence that a company has addressed RMI Indicators F.9.1 and F.9.2. and that individual sites have addressed MS 5. Companies would still have to provide additional evidence to be assessed against F.9.3 which is not addressed by TSM.

Section 2 - Elaborating on the fourth criterion identified by ICMM - comparability across companies

One of the four criteria used by ICMM in their submission addresses the ability of the RMI indicators to compare across companies. As TSM was specifically designed to be comparable across companies and between facilities, we would like to use the opportunity of this submission to build on ICMM's evaluation in this area. In their submission ICMM correctly states that 'comparability lies at the core of any index and underpins its integrity'.

As part of our review, we found that several of the indicators point to whether certain aspects of management systems are in place. MAC applauds RMI for maintaining this focus as our experience with TSM has shown that a management system focus is the most effective way to

both drive performance and establish a basis for comparability between companies and facilities. This is particularly apparent when contrasting management system focused initiatives like TSM and RMI with outcomes based standards such as GRI which present data that is impossible to compare between facilities or companies.

To illustrate this point with an example, RMI indicator D.2.2 assesses whether the company has measures in place to support local business. While it is difficult to fully assess the quality of this indicator without knowing RMI's scoring scheme, it becomes very easy to compare across companies if we take it at face value and consider it to be a yes/no question. This is generally the approach TSM takes. Likewise, for outcomes indicators, the thing that is comparable is whether the company is reporting on outcomes. The actual data that is reported matters less for comparison as it is unlikely to be comparable across companies. For example, a mine with a community of 5,000 people reports that its business development program with the community has resulted in the creation of three new businesses which combined to create 25 new jobs. Another mine reports on the same metric stating that they created five new businesses and 50 new jobs but in their case, the nearby community is 100,000 people. Without the extra context, the number of jobs and companies is incomparable and even if you have the extra context of population size, the comparison becomes very subjective. As such, it is more comparable to limit the evaluation to whether the company has measures in place to support local business and evaluate it on a binary yes/no basis.

RMI could go a step further by building in key questions into each indicator such as:
· Does the company have measures in place to support local businesses?
· Is there evidence to demonstrate that these measures are being implemented?
· Is there a mechanism to incorporate community input into the measures?

Otherwise, given the high level nature of the indicators and the lack criteria identifying what is defined as a desired level of performance, the only defensible approach RMI can take to compare between companies with the existing indicators is to evaluate them on a binary basis of whether the company has measures in place consistent with the indicator or not.

The commentary provided in section 9 of the RMI draft methodology offers examples of what companies should be doing for each indicator, but these are not presented as measurable criteria as is the case with the TSM protocols. Given the existing methodology and lack of identification of benchmarks of good practice within, MAC discourages RMI from ranking or evaluating candidate companies on a qualitative basis as such an evaluation would be based solely on the subjectivity of those scoring the companies with little to no transparency.

On a related note, TSM has always found it best to focus on what needs to be in place not how it should be done. As there are many ways to accomplish the performance objectives built into the indicators, it is best not to have the indicators prescribe the 'how'. This is also the case with

evaluating the effectiveness of measures or systems. As the 'how' will likely be different in each context, so should the evaluation of effectiveness. Again, if RMI wants to go further than a binary evaluation, a question could be incorporated into each indicator addressing whether the company has implemented a means to evaluate the effectiveness rather than try to define what that test should be. What is comparable is not whether the system or process is effective but rather, whether the company is evaluating its effectiveness in a way that includes stakeholders, where relevant.

Respectfully,

Ben Chalmers
Vice President, Sustainable Development
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Appendix 1 - Summary of Proposed TSM and RMI Equivalency

The following table summarizes the proposed equivalencies identified above for RMI's consideration:

RMI Indicator	Proposed TSM Equivalency
D.1 Community and Stakeholder Engagement	
D.1.1 - The company has management systems in place to facilitate ongoing and inclusive stakeholder engagement activities and to enable participation of affected communities and rights holders, including women and youth.	TSM Aboriginal and Community Outreach Protocol Indicator 1 Level A and Indicator 2 Level AAA
MS 1 - The operating company actively and inclusively engages affected communities in regular assessments of its impacts and in sharing the results, throughout the life of the mine.	TSM Aboriginal and Community Outreach Protocol Indicator 2 Level AAA
D.5 Indigenous Peoples	
D.5.1 - The company identifies all indigenous peoples' groups located near current and potential mines and associated facilities, including those in potential areas to be affected by the mining operation (e.g. mine tailings dams). It identifies their particular rights, interests and needs through inclusive meaningful participation.	TSM Aboriginal and Community Outreach Protocol Indicator 1 Level A and Indicator 2 Level AAA
D.11 Grievance and Remedy	
D.11.1 - The company has formal community grievance mechanisms in place for affected stakeholders to raise concerns in an easily accessible manner and have them addressed.	TSM Aboriginal and Community Outreach Protocol Indicator 3 Level A
D.11.2 - The company monitors and publicly reports on the effectiveness of the operational-level grievance and remedy mechanisms.	TSM Aboriginal and Community Outreach Protocol Indicator 3 Level A and Indicator 4 Level A
MS 3 - The operating company can demonstrate implementation of a grievance mechanism and claimants' effective access to remedy.	TSM Aboriginal and Community Outreach Protocol Indicator 3 Level A and Indicator 4 Level A
E.2 Occupational Health and Safety	
E.2.1 - The company commits to promote safe and healthy working conditions.	TSM Safety and Health Protocol Indicator 1 Level A

E.2.2 - The company has management systems in place which ensure a safe and healthy working environment for employees and contractors.	TSM Safety and Health Protocol Indicator 2 Level A
E.2.3 - The company regularly trains and tests its employees in good health and safety practices.	TSM Safety and Health Protocol Indicator 3 Level A
F.2 Tailings Management	
F.2.1 - The company has systems in place for tailings management, including regular internal and external review and assurance processes.	TSM Tailings Management Protocol Indicator 2 Level A and Indicator 3 Level A
F.2.2 - The company designs its tailings, waste and process facilities to prevent seepage and tailings dam failure and to protect the environment and communities from contamination and other impacts, including through the management of risks associated with potential changes.	TSM Tailings Management Protocol Indicator 2 Level A
F.6 Biodiversity	
F.6.1 - The company applies a mitigation hierarchy approach for biodiversity management.	TSM Biodiversity Conservation Management Protocol Indicator 1 Level A and Indicator 2 Level AA
F.7 GHG Emissions and Energy Efficiency	
F.7.1 - The company monitors and minimises GHG emissions generated by its activities.	TSM Energy Use and GHG Emissions Management Protocol Indicator 3 Level A
F.7.2 - The company monitors and improves energy efficiency throughout its operations.	TSM Energy and GHG Emissions Management Protocol Indicator 3 Level A
F.9 Emergency Preparedness	
F.9.1 - The company has systems in place for developing and maintaining emergency preparedness and response plans.	'Yes' in TSM Crisis Management and Communications PlanningProtocol Indicators 1, 2 and 3 and Level AA in the TSM Aboriginal and Community Outreach Protocol Indicator 2
F.9.2 - The company engages local authorities, workers and communities in developing, communicating and testing emergency preparedness and response plans throughout its operations.	'Yes' in TSM Crisis Management and Communications Planning Protocol Indicators 1, 2 and 3 and Level AA in the TSM Aboriginal and Community Outreach Protocol Indicator 2
MS 5 - The operating company engages local authorities, workers and communities in developing, communicating and testing its emergency preparedness and response plans.	'Yes' in TSM Crisis Management and Communications Planning Protocol Indicators 1, 2 and 3 and Level AA in the TSM Aboriginal and Community Outreach Protocol Indicator 2