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General remarks

1. It is good to see all the work that RMI has done over the last few years. A lot of progress has been made. In general, I agree with the indicators and the basic themes identified.
2. It is very important to include some mine sites in the research. However, this also generates some new dilemmas and complexities. See further.
3. There is a weird bias in the text. Mostly the language is objective and neutral but in some cases it is not. See further for details.
4. There is a bias towards, "do no harm principles". I find the issues of contribution to the country and/or the community a bit underrepresented in the whole text. Mainly in the economic block you find these issues. Should you consider what extra's the mining companies are doing for the country and the communities? The social license to operate is the key issue and challenge for companies. More and more conflicts develop between communities and companies. The companies cannot always be blamed for that. The communities just don't see enough benefits of mining. That is often caused by corruption and fraud from the governments, legal insecurity in concessions (the company gets a contract but during implementation issues occur that were not foreseen in the contract like resettlements, FPIC, etc). This absence of the government in the RMI methodology, is for me, an enormous dilemma. In the context of weak and corrupt governance, and weak or no presence of the state, you can be assured that a mining company will get into some (serious) trouble.
5. Should you add something on 'do good'

Specific remarks

1. When explaining the added value of the RMI, please mention the comparative nature of the data. Make clear that you are able to rank companies on their EESG performance.
2. On page 12 you write about the phasing out of coal. That is a very strong opinion. It would suffice to state why you include coal: it is a large commodity, companies are often active in many different metals or minerals and it is hard to split the data, etc. And coal will still be with us in the coming decades, especially in Asia, Africa, and Latin America. In the third bullet point you write, "negative effects", why use the word "negative", it should be "effects".
3. In the details of the indicators text (chapter 9) the judgment or moral high ground pops up regularly too.

Mine site indicators:

4. In your mine site questions you focus on engagement. Why? Is this the best key indicator for the sites?
5. The mine sites results are heavily affected by the local, regional or national context of the mine. I miss that context. Is it possible to include indicators or data, or rankings of the context like corruption, income inequality, indigenous people percentage of population, etc? Rankings of countries on these issues already exists.

6. Agree that water is an important issue that is likely to be relevant across all mining operations. However this indicator now might be too narrow to measure the local impact of mining. Broadening the indicator (with air quality, noise, etc.) might lead to a better assessment?
7. Local employment: distinguish between direct and indirect employment? F.e. might be interesting to know how much is locally sourced in terms of food, transport services, etc.

Other:

8. Living wage. That is an endless debate in sectors like the apparel industry. Why is it needed here? A lot of different standards and methods exist to define living wage. And these are unaligned and conflicting. To calculate living wage f.e. in Kenya, ISEAL wrote a document of 5180 pages. Mining salaries are normally very high. So why not compare the wages in question, with the formal minimum wage?
9. Land issues: please take a look at the Interlaken Group. The purpose of the Group is to expand and leverage private sector action to secure community land rights. Together they develop, adopt and disseminate new tools and advance new “pre-competitive” mechanisms to accelerate private sector learning on responsible land rights practices.
10. In B3.1. you ask companies to make contracts public. That is often unpermitted by national governments. How to solve?
11. The same can be said about FPIC. There you find the same legal insecurity. Only very few countries legally accept or demand FPIC. So as a company you are in a legal vacuum.