

M3 Partnership Integrated Assessment Protocol Pilots: Case Studies and Lessons Learned

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Background

The Mining, Minerals, and Metals Partnership ([M3 Partnership](#)) is a collaboration of the Initiative for Responsible Mining Assurance (IRMA), Responsible Jewellery Council (RJC), ResponsibleSteel, and Towards Sustainable Mining (TSM). The M3 Partnership, made possible by the [ISEAL Innovations Fund](#) with support by the Swiss State Secretariat for Economic Affairs, aims to identify opportunities for alignment and collective action to drive improvement in social and environmental performance.

A focal point of the M3 Partnership has been creation and testing of an Integrated Assessment Protocol (IAP) tool, designed to allow mine sites to be assessed against multiple site-level standards in a single audit. The IAP tool supports identification of alignment across standards and promotes demonstration of conformity with multiple standards with greater efficiency and reduced cost. The M3 IAP is responsive to concerns that the number of mining standards can be confusing, costly, and time-consuming, risk greenwashing, and reduce the effectiveness of all.

The M3 Partnership undertook two pilots with mining companies to test and improve the IAP tool. This document provides a summary of these pilots, case studies and lessons learned, and next steps.

Pilots

The M3 Partnership undertook two pilots using the IAP tool. One pilot was conducted with an Anglo American Platinum Group Metals mine in South Africa measured against the *IRMA Standard for Responsible Mining* and the *RJC Code of Practices Standard*. Another pilot was conducted with ArcelorMittal Mining Canada against the *IRMA Standard for Responsible Mining* and TSM.

Methodology

The M3 IAP Pilots proceeded based on the following steps:

1. Outreach to mining company leadership, discussion of pilot opportunity, and completion of participation and communications agreements
2. Share the IAP tool, training video, and guidance document with the company and third-party assessment teams; hold trainings and Q&A session(s)
3. Collect assessment data
4. Pull all assessment data into IAP tool and run reports
5. Present pilot findings and discuss key takeaways, lessons learned, and next steps
6. Use experience from the pilot to improve the IAP tool and methodology

Case Study One: Dances with Data

One pilot was based on existing data from prior assessments conducted under the respective standards instead of data produced simultaneously in a combined assessment. This pilot benefitted from being less time and labor intensive for the company team as their work on the original assessments was already complete. This was especially important given added pressures on mine management, supply chain challenges, and other issues linked to the COVID-19 pandemic, inflationary pressures, and Russia's invasion of Ukraine.

Some practical challenges arose in this pilot including:

- access to original data from a prior audit
- management of data recorded in multiple languages by different assessment teams
- the possibility that the different parties conducting the original assessments may interpret criteria differently
- lack of data on some requirements as one standard was updated after the assessment against a prior version of that standard was completed
- analysis of data gathered in different years complicates data analysis and comparisons across multiple standards, an issue that is likely to persist without integrated audits as standard systems for the mining sector typically do not operate on aligned assessment schedules

While the IAP tool was not designed to merge separate self-assessments prepared for different standards in different years, this pilot demonstrated that there may be some value in using the tool under such conditions. Specifically, it was realized that in many cases, a mine will already have existing data for one or more standards in separate formats and may want to merge those data sets into a single format using the IAP tool before embarking on an integrated assessment process.

Through this pilot we learned that, while there may be some efficiencies for merging different data sets, a decision to use data from different years should take into consideration possible variables, including: (a) accessibility of data, (b) language(s) of data, (c) any changes in one or more standards in the IAP since the time of the data collected, and (d) other practical challenges analyzing data collected at different points in time by different parties and likely reflecting different circumstances at different points in time.

This pilot was an opportunity to use the IAP tool with a party already using multiple M3 Partnership standards and enthusiastic about the potential to increase efficiency through an integrated assessment. The opportunity to learn about where standards aligned and where there are unique requirements was

useful to all engaged in this pilot, as was the experience of working with and improving a new assessment tool.

Case Study Two: Strategies for Integrating New Standards

Our other pilot involved conducting a single on-site audit to inform assessment against two standards—one that the mining company and assessment team knew well and another that was new to both the mining company and assessment team. This pilot required parties to learn a new standard and new systems in a relatively short timeframe.

An audit against any one of our standards is an intensive process, especially when it comes to conducting the on-site component of the audit. In this pilot the on-site was delayed until deemed safe under COVID-19 protocols. These necessary delays shortened the timeline available for completing the pilot, resulting in less time for managers to get buy-in from staff teams and for pilot participants to learn new standards and adapt to use of the IAP tool.

Onboarding a new standard also came with practical challenges as the assessment team took on multiple additional obligations including going through required trainings and approvals prior to the assessment; learning the unique requirements of the new standard and reviewing related guidance; and navigating use of a new tool. These assurance elements came as an addition to the already heavy lifting of reviewing company self-assessments, conducting desk-based and on-site assessments, reviewing data and evidence, and producing reports.

Both company participants and assessors preferred to use a static spreadsheet for collecting notes across departments; the macro-enabled IAP tool was new and there was insufficient time during the pilot for the auditors and site team to fully adapt to use of the tool.

Given the persistent time pressures faced by mine managers and third-party assessors, the need to learn new standards and new tools will remain challenges to address in any integrated assessment. Learning any new standard system and assessment tool will require an additional commitment of time and energy. While this was a challenge, the company was drawn to the opportunity to be recognized by two leading standards at the same time in a way that optimizes site personnel effort while also learning a new standard.

When onboarding a new standard for a company in an integrated audit, we learned the importance of considering the following variables: (a) availability of time to train company teams and third-party assessors regarding the new standard and use of the IAP tool well before commencing an integrated audit, (b) sufficient time for management to get buy-in from the site teams who will be

actively involved in the process, (c) ability to lengthen the timeline for the assessment and reporting to allow teams to navigate new standards and requirements, (d) establish strategies for coordinating data collection across tools and teams and importing data into the IAP tool in an efficient manner, and (e) clearly define pathways for recognition by the multiple standards including their respective reporting processes.

This pilot provided opportunities for all involved to learn more about a new standard and where it aligned with or was different from a standard in use; to learn about related assessment protocols and procedures; and to explore the possibility for completing an integrated assessment against multiple standards.

Next Steps

The M3 Partnership has benefited from engagement and collaboration spanning multiple years. This collaboration has strengthened our resilience in the face of the COVID-19 pandemic and other major challenges, including responding to implications of Russia's invasion of Ukraine.

Experience developing the IAP tool and conducting these pilots has informed and strengthened our respective standards and collective efforts. The companies engaged in the pilots are enthusiastic about ongoing collaboration to improve the IAP tool.

We will continue working with companies and across sectors to improve the IAP tool and to explore the potential for more integrated, efficient, and effective audit and reporting processes.

We plan to expand the IAP tool over time to include additional standards. Learn more and follow our progress at the [\(M3 Partnership\)](#) website.