Assessment of MAC member companies' Canadian mine sites in RMI Report 2022 with respect to TSM Protocols & Frameworks

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OVERVIEW

Introduction

The RMI Report 2022 is an independent evidence-based assessment of 40 large mining companies' policies and practices on economic, environmental, social and governance issues. In addition to the corporate-level indicators, a separate mine site assessment covers 250 mine sites and focuses on basic ESG actions, which relate directly to several TSM protocols and frameworks.

The RMI mine site assessment focuses largely on evidence of efforts by mining operations to inform and engage with affected stakeholders (communities, workers) on issues of direct importance to their lives and livelihoods.

Nine Canadian mine sites of five member companies of the Mining Association of Canada (MAC) are included in the RMI mine site assessment.

This brief provides the results for these nine mine sites against RMI mine site indicators that can serve as proxy indicators, based on public domain data, on the level of implementation and effective performance on the TSM standard.

MAC member companies' mine sites assessed in RMI Report 2022 mine site assessment

Mont-Wright (ArcelorMittal)	Havre St-Pierre (Rio Tinto)	Highland Valley (Teck)
Sudbury (Glencore)	Elkview (Teck)	Sudbury (Vale)
Diavik (Rio Tinto)	Fording River (Teck)	Thompson (Vale)

Resources

All the topics, indicators and metrics are available here in the RMI Framework 2022.

The full RMI Methodology is available here.

The full results of the RMI Report 2022 (40 companies, 251 mine sites) are available at: https://2022.responsibleminingindex.org/

Observations

Based on public domain evidence, the results presented in this brief show generally weak performances and high levels of variation across the different mine sites on the issues assessed.

Some of the weakest results are seen for example on the Protocol on Crisis Management and Communications Planning. While the TSM reported results show all nine mine sites fully compliant with this Protocol, the RMI mine site assessment shows seven of the nine sites scoring zero. This means that these seven sites show no public evidence of having informed affected communities of what to do in the case of an emergency, nor of having involved communities in the testing of the emergency response plans. Another weak area relates to the Protocol on Water Stewardship. Here five of the mine sites score zero, reflecting the fact that they show no evidence of having publicly disclosed mine-site level data on water quality or water quality, and no evidence of having involved communities in discussions and decisions around water management.

The strong contrast in many cases between the TSM reported results and the RMI results may in part be explained by the fact that TSM Protocols rarely require public disclosure by participating sites of the issues assessed. Neither does the TSM system require mine sites to provide evidence in the public domain to back up the results of their self-assessments or the external verifications of their performance.

Recommendations

The results presented in this brief show that while some TSM participating mine sites of MAC members show some level of alignment of their ESG practices with some of the Protocols and Frameworks, there are still considerable areas where evidence of implementation is weak and where performances are highly variable.

In the interest of credibility and effectiveness TSM could consider going further in supporting responsible practices by:

· Integrating into the Protocols and Frameworks clear requirements for public disclosure of:
  o mine-site level data, as a means of helping address this persistent gap in accountability and meaningful information sharing;
  o data on negative impacts as well as positive contributions; and
  o performance monitoring data (targets and tracking) at the mine site level.

In addition, MAC could enhance the credibility of its TSM verification procedures – and support industry-wide learning – by requiring participating sites to publicly disclose not only the results of their self-assessments or external verifications but also the evidence behind the results.

More broadly, MAC could extend its requirements for its members to apply TSM not only at the level of their Canadian operations, but across all their operations worldwide. In many cases, Canadian operations account for only a small number of MAC companies' total assets. For example, the companies included in this brief have operations in over 30 different countries. MAC could help level the playing field by exposing all its member companies' mine sites to the TSM process, thereby supporting better practices in a wider number of jurisdictions.

ANALYSIS

Overview of the results based on RMI Report 2022 per TSM Protocol

TSM Protocols

Mine site	Crisis Management & Com's	Indigenous & Community	Safety & Health	Tailings	Biodiversity	Water Stewardship
Mont-Wright (ArcelorMittal)	0%	25%	0%	25%	0%	0%
Sudbury (Glencore)	13%	50%	25%	38%	75%	25%
Diavik (Rio Tinto)	0%	25%	0%	25%	13%	13%
Havre St-Pierre (Rio Tinto)	0%	25%	0%	Not applicable	0%	0%
Elkview (Teck)	0%	0%	0%	50%	13%	38%
Fording River (Teck)	0%	0%	0%	50%	13%	38%
Highland Valley (Teck)	0%	0%	0%	63%	0%	0%
Sudbury (Vale)	38%	50%	0%	38%	13%	0%
Thompson (Vale)	0%	25%	0%	25%	0%	0%

The scores expressed in % above are averaged across corresponding indicators in the RMI Report 2022. Full details on an indicator-by-indicator basis are presented hereinafter.

TSM Crisis Management and Communications Planning Protocol

TSM Performance Indicators:

- Crisis management and communications preparedness
- Review
- Training

RMI Framework:

Safety of Communities (Indicator MS.08):
- Public disclosure of number and circumstances of non-work-related deaths
- Information for affected communities in case of mining-related emergency
- Involvement of communities, including women, in testing emergency response plans

RESULTS for MAC member companies' mine sites:

Mine sites	RMI Report 2022 (in %)	TSM results 2021/2022
Mont-Wright (ArcelorMittal)	0%	Full mark
Sudbury (Glencore)	13%	Full mark
Diavik (Rio Tinto)	0%	Full mark
Havre St-Pierre (Rio Tinto)	0%	Full mark
Elkview (Teck)	0%	Full mark
Fording River (Teck)	0%	Full mark
Highland Valley (Teck)	0%	Full mark
Sudbury (Vale)	38%	Full mark
Thompson (Vale)	0%	Full mark

TSM Indigenous and Community Outreach Protocol

TSM Performance Indicators:

- Community of Interest (COI) Identification
- Effective COI Engagement and Dialogue
- Effective Indigenous Engagement and Dialogue
- Community Impact and Benefit Management
- COI Response Mechanism

RMI Framework:

Community Complaints and Grievances (Indicator MS.09):
- Operational-level grievance mechanism for affected communities and individuals
- Male and female staff members available for receiving and processing grievances
- Public disclosure of number and types of grievances
- Discussion with affected communities over measures taken

RESULTS for MAC member companies' mine sites:

Mine sites	RMI Report 2022 (in %)	TSM results 2021/2022
Mont-Wright (ArcelorMittal)	25%	A-AAA
Sudbury (Glencore)	50%	AA-AAA
Diavik (Rio Tinto)	25%	AA-AAA
Havre St-Pierre (Rio Tinto)	25%	AA-AAA
Elkview (Teck)	0%	AAA
Fording River (Teck)	0%	AAA
Highland Valley (Teck)	0%	A-AAA
Sudbury (Vale)	50%	AAA
Thompson (Vale)	25%	AA-AAA

TSM Safety and Health Protocol

TSM Performance Indicators:

- Commitments and Accountability
- Planning and Implementation
- Training, Behaviour and Culture
- Monitoring and Reporting
- Performance

RMI Framework:

Safety and Health of Workers (Indicator MS.10):
- Safety equipment provided to all employees and contractors
- Suitable sanitation and changing facilities provided to all workers
- Separated sanitation and changing facilities for women workers
- Public disclosure of average hours worked per worker and per day

RESULTS for MAC member companies' mine sites:

Mine sites	RMI Report 2022 (in %)	TSM results 2021/2022
Mont-Wright (ArcelorMittal)	0%	AA-AAA
Sudbury (Glencore)	25%	AA-AAA
Diavik (Rio Tinto)	0%	AAA
Havre St-Pierre (Rio Tinto)	0%	A-AA
Elkview (Teck)	0%	AA-AAA
Fording River (Teck)	0%	AA-AAA
Highland Valley (Teck)	0%	AAA
Sudbury (Vale)	0%	A-AAA
Thompson (Vale)	0%	A-AA

TSM Tailings Management Protocol

TSM Performance Indicators:

- Tailings management policy and commitment
- Tailings management system and emergency preparedness
- Assigned accountability and responsibility for tailings management
- Annual tailings management review
- Operation, maintenance, and surveillance (OMS) manual

RMI Framework:

Tailings (Indicator MS.07):
- Public disclosure of exact location of tailings storage areas
- Tailings storage areas signed and made safe for people and animals
- Public disclosure of geographic area that a failure of its tailings facilities can affect
- Regular tests of sirens and other warning systems

RESULTS for MAC member companies' mine sites:

Mine sites	RMI Report 2022 (in %)	TSM results 2021/2022
Mont-Wright (ArcelorMittal)	25%	A-AAA
Sudbury (Glencore)	38%	B-AAA
Diavik (Rio Tinto)	25%	AAA
Havre St-Pierre (Rio Tinto)	Not applicable	Not assessed
Elkview (Teck)	50%	A
Fording River (Teck)	50%	A
Highland Valley (Teck)	63%	AAA
Sudbury (Vale)	38%	B
Thompson (Vale)	25%	AA-AAA

TSM Biodiversity Conservation Management

TSM Performance Indicators:

- Corporate biodiversity conservation commitment, accountability, and communications
- Facility-level biodiversity conservation planning and implementation
- Biodiversity conservation reporting

RMI Framework:

Rehabilitation and Post-Closure (Indicator MS.06):
- Information for affected communities over closure
- Development of rehabilitation and post-closure plans with affected communities, including women.

RESULTS for MAC member companies' mine sites:

Mine sites	RMI Report 2022 (in %)	TSM results 2021/2022
Mont-Wright (ArcelorMittal)	0%	B
Sudbury (Glencore)	75%	AA-AAA
Diavik (Rio Tinto)	13%	AAA
Havre St-Pierre (Rio Tinto)	0%	B-AA
Elkview (Teck)	13%	AAA
Fording River (Teck)	13%	AAA
Highland Valley (Teck)	0%	AAA
Sudbury (Vale)	13%	AAA
Thompson (Vale)	0%	A-AA

TSM Water Stewardship Protocol

TSM Performance Indicators:

- Water Governance
- Operational Water Management
- Watershed-scale Planning
- Water Reporting and Performance

RMI Framework:

Water Quality and Quantity (Indicators MS.04 and MS.05):
- Disclosure over water quality and quantity data
- Information over water quality below safety limits
- Involve communities, including women in discussions and decisions on water management

RESULTS for MAC member companies' mine sites:

Mine sites	RMI Report 2022 (in %)	TSM results 2021/2022
Mont-Wright (ArcelorMittal)	0%	A-AAA
Sudbury (Glencore)	25%	B-AAA
Diavik (Rio Tinto)	13%	AA-AAA
Havre St-Pierre (Rio Tinto)	0%	A-AA
Elkview (Teck)	38%	AA-AAA
Fording River (Teck)	38%	AA-AAA
Highland Valley (Teck)	0%	AA-AAA
Sudbury (Vale)	0%	A-AA
Thompson (Vale)	0%	C-AA

Responsible Mining Foundation

The Foundation supports the principle that minerals and metals mining should benefit the economies, improve the lives of peoples and respect the environments of producing countries, while also benefiting mining companies in a fair and viable way.

The Foundation's work and research reflect what society at large can reasonably expect from mining companies on economic, environmental, social and governance matters.

www.responsibleminingfoundation.org

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The RMI seeks evidence of companies' policies and practices on economic, environmental, social and governance (EESG) issues, but does not seek to measure the actual outcomes achieved on EESG issues. Results are based only on evidence sourced from the public domain or provided by companies as open data. Whilst this information is believed to be reliable, no guarantee can be given that it is accurate or complete, nor does it preclude the possibility that policies and practices may exist, but which the RMI has not been able to consider for purposes of assessment.

In this respect, the results of the low-scoring companies do not necessarily reflect a lack of relevant policies and practices; as they may be due to a lack of public reporting by the companies, limitations in accessing information, and/or any difficulties in accessing the RMI company portal.

It should be noted that, prior to publication, all companies in the RMI were invited to check the factual accuracy of the contextual data and evidence upon which the RMI is based and to review company information in the RMI document library.

Although every effort has been made to verify the accuracy of translations, the English language version should be taken as the definitive version.

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