



# **Feedback Document**

## Responsible Gold Mining Principles

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**WGC (UK) Limited**

10 Old Bailey, London EC4M 7NG  
United Kingdom

**T** +44 20 7826 4700 **F** +44 20 7826 4799 **W** [www.gold.org](http://www.gold.org)

Registered in England and Wales, Company No. 07867682

## **Introduction**

This document sets out changes made to the 'Exposure' draft of the Responsible Gold Mining Principles, published in March 2019, as a consequence of the second round of stakeholder consultation. Consultation on the first draft of the Principles initially ran from June 2018 until August 2018. Across the two rounds of consultation, input was received from around 300 external stakeholder interactions including through eight independently facilitated roundtables; one to one meetings; written submissions; presentations at third party events and an on-line questionnaire. Input was received from governments, international organisations, investors, international, national and local civil society organisations, supply chain participants, assurance providers and gold mining companies.

## **First round of consultation**

In the first round of consultation, substantive changes were made to: the overall framework and introductory text and to over a third of the Principles. Additional Principles were created covering political donations; tax and transfer pricing; human rights and security; and land-use and deforestation. As a result of changes made at that point, the focus on the identification and management of impacts was increased. In all cases relating to the collection of stakeholder inputs, companies were reminded through the Principles that the information needs to be used to inform operational management decisions.

## **Consultation on the 'Exposure' draft**

As a result of input received through the second round of consultation, substantive changes have been made again to over one third of the Principles. The changes include: a new principle on cultural heritage (7.7); an expansion of commitments on gender and diversity and other aspects of rights and conduct in the workplace; and major amendments have been made on indigenous peoples and resettlement. Amongst the most significant changes are those relating to transparency (1.5 – where a commitment is made to country and project level reporting); due diligence (2.3 - implementing companies will need to carry out risk-based due diligence on the entities to which they sell their gold); impact assessment (2.4); Artisanal and Small-scale Miners (3.3); safety (4.1 changes relate to safety training); safety and health (4.2 - a commitment to mental health has been added); wages and benefits (6.1 – the coverage of the Principle has been extended to include 'benefits'); discrimination and bullying (6.2); freedom of association and collective bargaining (6.4); diversity and women in mining (6.5 and 6.6 now include a wider range of expectations); understanding communities (7.2 the need for implementing companies to be aware of the potential for differentially negative impacts has been extended from women to also cover 'children, indigenous peoples and other marginalised groups'); Indigenous Peoples (7.6 where a commitment is introduced to 'work to obtain FPIC where 'significant adverse impacts may occur'); resettlement (7.8 where requirements have been added in relation to 'restoration of established livelihoods' and to 'seeking to minimise adverse impacts on displaced people'); tailings (8.2 where the approach is extended to heap leach facilities and large-scale water infrastructure); and energy efficiency and reporting (10.4 reporting will need to be in line with 'accepted reporting standards'). Greater detail is given in the table below. In addition, in footnote 3, guidance on the application of the mitigation hierarchy is provided.

Some stakeholders advocated for conflicting positions and some may feel that we have opted for positions that fall short of their ideal. Areas where we have not fully taken on board stakeholder advocacy include the management of indirect impacts; executive remuneration; more specificity on artisanal and small-scale mining; failing to require certified conformance with the Cyanide Code – as opposed to achieving 'alignment with the Code's Standards of Practice'; not broadening the range of 'no go' areas beyond World Heritage Sites and failing to go in to greater detail around employee benefits. The Principles will, however, be subject to periodic review and the World Gold Council hopes to continue its dialogue with stakeholders on these and other issues.

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
<b>Principle1: Ethical conduct: We will conduct our businesses with integrity including absolute opposition to corruption</b>	<b>Principle1: Ethical conduct: We will conduct our businesses with integrity including absolute opposition to corruption</b>	Unchanged
1.1 As a minimum expectation, we will comply with applicable host and home country laws and relevant international law and maintain systems to deliver on this objective	1.1 <b>Legal Compliance:</b> As a minimum expectation, we will comply with applicable host and home country laws and relevant international law and maintain systems to deliver this objective	Substantively unchanged
1.2 We will maintain a code of conduct to make clear the standards with which we expect our employees, and those with whom we do business, to comply. We will actively promote awareness of the code and implement systems to monitor and ensure compliance	1.2 <b>Code of Conduct:</b> We will maintain a code of conduct to make clear the standards with which we expect our employees, and those with whom we do business, to comply. We will actively promote awareness of the code and implement systems to monitor and ensure compliance	Unchanged
1.3 We will put in place controls to combat: bribery and corruption in all its forms; conflicts of interest and anti-competitive behaviour by employees, agents or other company representatives	1.3 <b>Combatting bribery and corruption:</b> We will put in place controls to combat: bribery and corruption in all their forms; conflicts of interest and anti-competitive behaviour by employees, agents or other company representatives	Substantively unchanged
1.4 We will disclose the value and beneficiaries of financial and in-kind political contributions which we make whether directly or through intermediaries	1.4 <b>Political contributions:</b> We will disclose the value and beneficiaries of financial and in-kind political contributions which we make whether directly or through intermediaries	Unchanged

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
<p>1.5 We will publish our tax and other payments to governments annually except where this is prohibited by national law. We support the principles of the Extractive Industries Transparency Initiative (EITI) and will work with governments to promote greater transparency around revenue flows, mining contracts and the beneficial ownership of license holders and business partners</p>	<p>1.5 <b>Transparency:</b> We will publish our tax, <b>royalty</b> and other payments to governments annually <b>by country and project</b>. We support the principles of the Extractive Industries Transparency Initiative (EITI) and will <b>encourage governments to</b> promote greater transparency around revenue flows, mining contracts and the beneficial ownership of license holders.</p>	<p>Addition of specific reference to ‘royalty’ payments and broadening of commitment to reporting so as to include country by country and project by project reporting. Change to second sentence from ‘work with governments’ to ‘encourage governments to’ which is believed to be easier to assure. Deletion of provision on beneficial ownership of all ‘business partners’ on grounds of practicability.</p>
<p>1.6 We will pay the taxes and royalties required by host country codes. We will seek to ensure that transfer pricing outcomes are in line with fair business practices and value creation</p>	<p>1.6 <b>Taxes and transfer pricing:</b> We will pay the taxes and royalties required by host country codes. We will seek to ensure that transfer pricing outcomes are in line with fair business practices and value creation</p>	<p>Unchanged</p>
<p>1.7 We will assign accountability for our sustainability performance at the Board and/or Executive Committee level. We will report publicly on our implementation of the Responsible Gold Mining Principles</p>	<p>1.7 <b>Accountabilities and reporting:</b> We will assign accountability for our sustainability performance at the Board and/or Executive Committee level. We will report publicly <b>each year</b> on our implementation of the Responsible Gold Mining Principles</p>	<p>Small clarification to ensure that public reporting is undertaken at least annually</p>

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
<p><b>Principle 2: Understanding our impacts: We will engage with our stakeholders and implement management systems so as to ensure that we understand and manage our impacts, realise opportunities and provide redress where needed</b></p>	<p><b>Principle 2: Understanding our Impacts: we will engage with our stakeholders and implement management systems so as to ensure that we <u>assess</u>, understand and manage our impacts, realise opportunities and provide <u>remedy</u> where needed</b></p>	<p>Addition of 'assess' in relation to impacts as a precursor to understanding and managing them. Substitute of 'remedy' for 'redress' so as better to align with the language used in the UN Guiding Principles on Business and Human Rights</p>
<p>2.1 We will maintain systems to identify and prevent or manage both the risks that face our operations and those which our activities may pose to others</p>	<p>2.1 <b>Risk management:</b> We will maintain systems to identify and prevent or manage both the risks that face our operations and those which our activities may pose to others</p>	<p>Unchanged</p>
<p>2.2 We will listen to and engage with stakeholders so as to better understand their interests and concerns and integrate this knowledge in to how we do business</p>	<p>2.2 <b>Stakeholder management:</b> We will listen to and engage with stakeholders <b>in order</b> to understand better their interests and concerns and integrate this knowledge into how we do business</p>	<p>Small stylistic change 'in order to', instead of 'so as to'</p>
<p>2.3 We will regularly conduct due diligence to identify human rights and conflict risks associated with our activities and in our supply chain with the intention of generating actionable findings</p>	<p>2.3 <b>Due diligence:</b> We will regularly <b>and systematically</b> conduct due diligence to identify human rights, <b>corruption</b> and conflict risks associated with our activities and in our supply chain with the <b>intention of preventing adverse impacts. We will exercise risk-based due diligence on those entities to which we sell our products</b></p>	<p>Addition of commitment to undertake due diligence on corruption risks and for due diligence to be conducted 'systematically'. Firming up of earlier commitment to generate 'actionable findings' so that it now refers to carrying out due diligence with the 'intention of preventing adverse impacts'. An important new commitment has been added that implementing companies will exercise risk-based due diligence on entities to which they supply gold</p>

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<b>Principle</b>		
<p>2.4 We will conduct impact assessments that involve both substantive environmental and social elements. We will ensure that such assessments are made available to affected communities and we will work to avoid, minimise, mitigate or compensate for significant adverse impacts</p>	<p>2.4 <b>Impact assessment:</b> We will conduct impact assessments that involve substantive environmental components, socio-economic (including human rights where relevant) and <b>cultural elements</b> and ensure that these are periodically updated. <b>We will seek to identify and take account of local cumulative impacts.</b> We will ensure that such assessments are <b>accessible to affected communities</b> and include plans to avoid, minimise, mitigate or compensate for significant adverse impacts</p>	<p>The stipulations surrounding expectations of ESIA's have been made more precise and considerations of 'cultural elements' have been added. The need to take account of 'cumulative impacts' has been added. Impact Assessments should not only be made 'available' to affected communities; they should be 'accessible' to them.</p>
<p>2.5 We will establish fair, accessible, effective and timely mechanisms through which complaints and grievances related to our activities can be raised and resolved and remedies implemented. Those raising such grievances in good faith will not face discrimination or retaliation as a result of raising their concerns</p>	<p>2.5 <b>Resolving grievances:</b> We will establish fair, accessible and timely mechanisms through which complaints and grievances related to our activities can be raised and resolved and remedies implemented. Those raising such grievances in good faith will not face discrimination or retaliation as a result of raising their concerns.</p>	<p>Substantively unchanged</p>

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
<b>Supply Chain</b> <b>Principle 3: We will require that our suppliers conduct their business ethically and responsibly as a condition of doing business with us</b>	<b>Supply Chain</b> <b>Principle 3: We will require that our suppliers conduct their business ethically and responsibly as a condition of doing business with us</b>	Unchanged
3.1 We will adopt a supply chain policy and require that our contractors and suppliers operate responsibly and to comparable ethical, safety, health, human rights, social and environmental standards to our own. We will conduct risk-based monitoring of compliance	3.1 <b>Supply chain policy:</b> We will adopt <b>and publish</b> a Supply Chain Policy <b>and support</b> our contractors and suppliers to operate responsibly and to standards of ethics, safety, health, human rights, and social and environmental performance comparable with our own. We will conduct risk-based monitoring of compliance	The amendments now require that a company's Supply Chain Policy should be published. The language relating to 'requiring' suppliers to conform with the thrust of the implementing company's Policy has been adjusted to refer to 'support(ing)' them in doing so, so as to make it more likely that the objective can be delivered
3.2 We will promote access for local businesses to procurement and contracting opportunities generated by our operations and, where appropriate, provide capacity building support to help them to improve their capabilities as suppliers.	3.2 <b>Local procurement:</b> We will promote access for local businesses to procurement and contracting opportunities generated by our operations and, where appropriate, provide capacity building support to help them improve their capabilities as suppliers	Unchanged
3.3 We support access to legitimate markets for those artisanal and small-scale miners (ASM) who respect applicable legal frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalisation	3.3 <b>Market access for ASM:</b> We support access to legitimate markets for those artisanal and small-scale miners (ASM) who respect applicable legal and regulatory frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalisation. <b>We will consider supporting government initiatives to reduce and eliminate the use of mercury by ASM</b>	Addition of extra sentence which commits large-scale mine operators to consider involvement in supporting government-led initiatives designed to reduce the use of mercury by ASM

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<b>Principle</b>		
<p><b>Safety and health</b>  <b>Principle 4: We value the safety and occupational health of our workforce above all other priorities and will empower them to speak-up if they encounter unsafe working conditions</b></p>	<p><b>Safety and health</b>  <b>Principle 4: We will protect and promote the safety and occupational health of our workforce (employees and contractors) above all other priorities and will empower them to speak-up if they encounter unsafe working conditions</b></p>	Substantively unchanged
<p>4.1 We will be pro-active in preventing fatalities and injuries to our workforce. Personal protective equipment will be supplied to our workforce at no cost to them. Our objective is zero harm</p>	<p><b>4.1 Safety:</b> We will be pro-active in preventing fatalities and injuries to our workforce. <b>Regular safety training</b> will be conducted and personal protective equipment will be supplied at no cost to our workforce. Our objective is zero harm.</p>	A commitment to the provision of regular safety training has been added
<p>4.2 We will maintain high standards of occupational health and hygiene and implement risk-based monitoring of the health of our workforce based on occupational exposures</p>	<p><b>4.3 Occupational health and wellbeing:</b> We will maintain high standards of occupational health and hygiene and implement risk-based monitoring of the health of our workforce based on occupational exposures. <b>We will promote the physical and mental wellbeing of our workforce</b></p>	An extra sentence has been added requiring implementing companies to promote the 'physical and mental wellbeing of their workforce'
<p>4.3 We will implement health and safety management systems based on internationally-recognised good practice and focussed on continuous improvement of our safety and health performance and will engage regularly on these issues with our workforce and their representatives</p>	<p><b>4.2 Safety Management Systems:</b> We will implement safety and health management systems based on internationally recognised good practice and focussed on continuous improvement of our performance. <b>We will engage regularly on these issues with our workforce and their representatives</b></p>	Substantively unchanged

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<b>Principle</b>		
<p>4.4 We will identify and eliminate or minimise significant risks to the health or safety of local people as a result of our activities. We will develop, maintain and test emergency response plans consistent with the APELL process. Where risks to external stakeholders are significant this should be undertaken in collaboration with potentially affected parties and consistent with established industry good practice</p>	<p><b>4.4 Community health and emergency planning:</b> We will identify and eliminate or minimise significant risks to the health and safety of local people as a result of our activities and those of our contractors. We will develop, maintain and test emergency response plans based on national regulations and international best practice guidelines, ensuring the involvement of potentially affected stakeholders</p>	<p>Substantively unchanged. Some re-ordering of the language around emergency planning and the replacement of an explicit reference to the APELL framework (on the basis of low spontaneous recognition of APELL on the part of stakeholders) with a broader reference to international best practices</p>

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Principle		
<b>Human rights &amp; conflict</b> <b>Principle 5: We will respect the human rights of our workforce, affected communities and all those people with whom we interact</b>	<b>Human rights and conflict:</b> <b>Principle 5 - We will respect the human rights of our workforce, affected communities and of all those people with whom we interact</b>	Unchanged
5.1 We will adopt and implement policies, practices and systems based on the UN Guiding Principles on Business and Human Rights	<b>5.1 UN Guiding Principles:</b> We will adopt and implement policies, practices and systems based on the UN Guiding Principles on Business and Human Rights	Unchanged
5.2 We will seek to ensure that we do not cause and are not complicit in human rights abuses either directly or through our business relationships	<b>5.2 Avoiding complicity:</b> We will seek to ensure that we do not cause, and are not complicit in, human rights abuses either directly or through our business relationships	Substantively unchanged
5.3 We will manage security-related human rights' risks through implementation of the Voluntary Principles on Security and Human Rights	<b>5.3 Security and human rights:</b> We will manage security-related human rights' risks through implementation of the Voluntary Principles on Security and Human Rights	Unchanged
5.4 We will implement the Conflict-Free Gold Standard. We will ensure that when we operate in conflict-affected or high-risk areas, our operations do not cause, support or benefit unlawful armed conflict or contribute to serious human rights abuses or breaches of international humanitarian law.	<b>5.4 Conflict:</b> We will implement the Conflict-Free Gold Standard. We will ensure that when we operate in conflict-affected or high-risk areas, our operations do not cause, support or benefit unlawful armed conflict or contribute to serious human rights abuses or breaches of international humanitarian law.	Unchanged

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<b>Principle</b>		
<b>Labour rights</b> <b>Principle 6: We will ensure that our operations are places where employees and contractors are treated with respect and are free from discrimination or abusive labour practices</b>	<b>Labour rights</b> <b>Principle 6: we will ensure that our operations are places where employees and contractors are treated with respect and are free from discrimination or abusive labour practices</b>	Unchanged
6.1 We will ensure that our workforce receives fair remuneration relative to relevant national and local benchmarks, norms and regulations	<b>6.1 Wages and benefits:</b> We will ensure that our workforce receives fair wages <b>and benefits</b> relative to relevant national and local benchmarks, norms and regulations	A reference to 'benefits' has been added
6.2 We will engage constructively with our employees and strive to ensure a workplace free from discrimination, bullying or harassment	<b>6.2 Preventing discrimination and bullying:</b> We will engage <b>regularly and</b> constructively with our employees <b>and their representatives</b> and strive to ensure a workplace free from bullying or harassment and <b>unfair discrimination</b>	The provision on employee engagement has been made more demanding through the requirement that engagement be conducted regularly. The reference to 'discrimination' has been qualified by the addition of 'unfair' so as to accommodate situations where there may be individual cases of discrimination but within the context of programmes designed to address issues of historic or institutional disadvantage
6.3 We prohibit exploitative child labour, forced labour and modern slavery in our operations and in our supply chains	<b>6.3 Child and forced labour:</b> We prohibit exploitative child labour, forced labour and modern slavery in our operations and in our supply chains	Unchanged
6.4 We will uphold the rights of our employees to exercise their legal rights to associate with others and to join or refrain from joining organisations of their choice and to bargain collectively without discrimination or retaliation	<b>6.4 Freedom of association and collective bargaining:</b> We will uphold the <b>rights of our workforce</b> to associate with others and to join, or to refrain from joining, <b>labour</b> organisations of their choice and to bargain collectively without discrimination or retaliation	The commitment to freedom of association and collective bargaining is extended from 'employees' to the 'workforce' (e.g. on-site contractors). The commitment to 'uphold' freedom of association is made more precise through tying it to 'labour' organisations



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<p><b>Principle</b></p>		
<p>6.5 We will implement policies and practices to promote diversity and especially the rights and inclusion of women</p>	<p><b>6.5 Diversity:</b> We will implement policies and practices to promote diversity at all levels of the company, including the representation and inclusion of historically under-represented groups and will report on our progress</p> <p><b>6.6 Women and Mining:</b> We are committed to identifying and resolving barriers to the advancement and fair treatment of women in our workplaces. Through our employment, supply chain, training and community investment programmes, we will aim to contribute to the socio-economic empowerment of women in the communities associated with our operations</p>	<p>The provisions on diversity in general and the position of women in the workplace and mining communities have been significantly expanded and a reference to historically under-represented groups has been included. A commitment to reporting on progress has been added. It is made clear that the commitment to diversity applies at all levels of seniority. The provisions on the position of women in mining communities are new.</p>
<p>6.6 We will provide a confidential mechanism through which employees and others associated with our activities may raise ethical concerns and which provides protection from retaliation for those who raise concerns in good faith</p>	<p><b>6.7 Raising concerns:</b> We will provide a confidential mechanism through which employees and others associated with our activities may raise ethical concerns and which <b>will</b> provide protection from retaliation for those who raise concerns in good faith</p>	<p>Substantively unchanged</p>

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<b>Principle</b>		
<b>Local Communities</b> <b>Principle 7: Working with communities: We will contribute to the socio-economic advancement of communities associated with our operations and treat them with dignity and respect</b>	<b>Local Communities</b> <b>Principle 7: Working with communities: We will contribute to the socio-economic advancement of communities associated with our operations and treat them with dignity and respect</b>	Unchanged
7.1 We will consult meaningfully and in good faith with the communities associated with our operations on matters of interest to them and will take account of their perspectives and concerns	<b>7.1 Community consultation:</b> We will consult <b>regularly</b> and in good faith with the communities associated with our operations on matters of interest to them and will take account of their perspectives and concerns	Substantively unchanged. The word ‘meaningfully’ has been changed to ‘regularly’ to emphasise the importance of an ongoing dialogue; the additional connotations associated with ‘meaningfully’ are already implied through the requirement for consultation to be conducted in ‘good faith’
7.2 We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner. We will be alert to the dangers of causing differentially negative impacts on women and will strive to give equal weight to their views together with those of indigenous people and other potentially vulnerable or marginalised groups.	<b>7.2 Understanding communities:</b> We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner. We will be alert to the dangers of causing differentially negative impacts on women, <b>children, Indigenous Peoples and other potentially vulnerable or marginalised groups</b> . We will <b>strive to ensure that the voices of these groups are heard</b> and that this knowledge is integrated into how we do business	The requirement for companies to be alert to causing differentially negative impacts has been broadened from ‘women’ to include ‘children, Indigenous Peoples and other potentially vulnerable or marginalised groups’. The commitment to ensure all voices are ‘heard’ was felt to be more inclusive than the previous formulation
7.3 We will ensure that the communities associated with our operations are offered meaningful opportunities to benefit from our presence, including through access to jobs, procurement opportunities for local businesses and social investment	<b>7.3 Creating local benefits:</b> We will ensure that the communities associated with our operations are offered meaningful opportunities to benefit from our presence, including through access to jobs, <b>training</b> , procurement opportunities for local businesses and social investment	Training has been added as a further means through which a mine can deliver benefits to local people

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<p><b>Principle</b></p>		
<p>7.4 We will seek to obtain the broadly-based support of communities affected by our activities. We will work with local authorities and community leaders to control or manage the impact of migratory influxes of people attracted by mine development</p>	<p><b>7.4 Seeking community support:</b> We will seek to obtain <b>and sustain</b> the broadly-based support of communities affected by our activities</p> <p><b>7.5 In-migration:</b> We will work with local authorities and community leaders to control or manage the impact of migratory influxes of people attracted by mine development</p>	<p>Former Principle 7.4 has been split in two since seeking community support and the potential management of in-migration are fundamentally different issues whilst the original provisions are substantively unchanged. The objective of seeking broadly-based community support has been extended to seeking to ‘obtain <b>and sustain</b>’ support</p>
<p>7.5 We will respect the customary rights, culture and connection to the land of indigenous peoples. We will conduct meaningful consultation with relevant groups during exploration, project design, operation and closure including around the delivery of sustainable benefits</p>	<p><b>7.6 Indigenous Peoples:</b> We will respect the <b>collective and</b> customary rights, culture and connection to the land of Indigenous Peoples. We will <b>work to obtain their free, prior and informed consent, where significant adverse impacts may occur</b> during exploration, project design, operations and closure, including around the delivery of sustainable benefits</p>	<p>Reference has been included in the revised Principle to the ‘collective’ rights of Indigenous Peoples. The Principles will now also require companies ‘to work to obtain free, prior and informed consent, where significant adverse impacts may occur’</p>
	<p><b>7.7 Cultural Heritage:</b> We will seek to preserve cultural heritage from adverse impacts associated with project activities, including through impact assessments. We will put in place chance find procedures at all relevant operations</p>	<p>A Principle on the preservation of Cultural Heritage has been included for the first time</p>

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<b>Principle</b>		
<p>7.6 We will seek to avoid involuntary resettlement. Where this is unavoidable, we will proceed on the basis of meaningful consultation with affected communities, a publicly-available planning framework, and the provision of fair and timely compensation</p>	<p><b>7.8 Resettlement:</b> We will seek to avoid involuntary resettlement. Where this is unavoidable, we will proceed on the basis of meaningful consultation with affected communities, a publicly-available planning framework, <b>the restoration of established livelihoods</b>, the provision of fair and timely compensation and <b>seeking to minimise adverse impacts on displaced people</b></p>	<p>This Principle has been strengthened through the addition of a provision on the need for companies motivating a resettlement to seek to ‘minimise adverse impacts on displaced people’ and to provide for the ‘restoration of established livelihoods’.</p>

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<b>Principle</b>		
<b>Environmental Stewardship</b> <b>Principle 8: We will ensure that environmental responsibility is at the core of how we work</b>	<b>Environmental Stewardship</b> <b>Principle 8: We will ensure that environmental responsibility is at the core of how we work</b>	Unchanged
8.1 We will implement systems to monitor and manage our impacts on the environment. We will avoid, minimise, mitigate or compensate for adverse impacts on the environment relating to our activities	<b>8.1 Managing environmental impacts:</b> We will implement systems to monitor and manage our impacts on the environment. We will avoid, minimise, mitigate or compensate for significant adverse impacts on the environment relating to our activities	Unchanged
8.2 We will design, build, manage and decommission tailings storage facilities using ongoing management and governance practices in line with widely-recognised international good practice guidelines. We will not develop a new mine that would involve the use of riverine and shallow submarine tailings	<b>8.2 Tailings and waste management:</b> We will design, build, manage and decommission tailings storage <b>and heap-leaching facilities and large-scale water infrastructure</b> using ongoing management and governance practices in line with widely supported good-practice guidelines. We will not develop a new mine that would involve the use of riverine or shallow submarine tailings	The scope of the Principle is extended from ‘tailings’ to also cover ‘heap-leaching facilities and large-scale water infrastructure’, which may raise similar risk-management and stakeholder concerns. The word ‘international’, in relation to good-practice guidelines has been dropped because it was argued that some of the best regarded standards in the field may come from national regulators rather than needing to be ‘international’
8.3 We will identify and manage potential risks relating to the transportation, handling, storage and disposal of hazardous materials. Where our operations use cyanide we will ensure that our arrangements for the transport, storage, use and disposal of cyanide are in line with the standards of practice of the International Cyanide Management Code	<b>8.3 Cyanide and hazardous materials:</b> We will identify and manage potential risks relating to the transportation, handling, storage and disposal of <b>all</b> hazardous materials. Where our operations use cyanide, we will ensure that our arrangements for the transport, storage, use and disposal of cyanide are in line with the standards of practice set out in the International Cyanide Management Code	Substantively unchanged

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<b>Principle</b>		
<p>8.4 We will not use mercury to extract gold in our processing facilities nor accept gold produced by third parties using mercury. We support the Minamata Convention's objective of reducing mercury emissions, for the protection of human health and the environment. We will identify point sources of mercury emissions to the atmosphere and minimise them. We will only sell mercury thereby captured for uses recognised as acceptable by international conventions</p>	<p><b>8.4 Mercury:</b> We will not use mercury to extract gold in our processing facilities nor accept gold produced by third parties using mercury. We support the Minamata Convention's objective of reducing mercury emissions, for the protection of human health and the environment. We will identify point source mercury emissions to the atmosphere, <b>arising from our</b> activities, and minimise them. We will only sell mercury thereby captured for uses recognised as acceptable by international conventions</p>	<p>In relation to 'point source' emissions of mercury, the obligation on implementing companies to minimise them is to be tied to those that arise from their activities rather than implying a broader responsibility</p>
<p>8.5 We will adopt and implement policies and practices to avoid or mitigate impacts on local communities and the environment arising from noise, dust and blasting</p>	<p><b>8.5 Noise and dust:</b> We will adopt and implement policies and practices to avoid or mitigate impacts on local communities and the environment arising from noise, dust, blasting and vibration</p>	<p>Impacts arising from vibration are added to the list of potential impacts to be managed</p>
<p>8.6 We will not explore in or seek to develop new mining operations in an area designated as a World Heritage Site</p>	<p>See Principle 9.2</p>	

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<b>Principle</b>		
<b>Biodiversity, land use and mine closure</b> <b>Principle 9: We will work to ensure that fragile ecosystems, habitats and endangered species are protected from damage and will plan for responsible mine closure</b>	<b>Biodiversity, land use and mine closure</b> <b>Principle 9: We will work to ensure that fragile ecosystems, habitats and endangered species are protected from damage and will plan for responsible mine closure</b>	Unchanged
9.1 We will implement biodiversity management plans. At a minimum, we will seek to ensure that there is no net loss of critical habitat. Where opportunities arise to do so, we will work with others to produce a net positive impact on biodiversity. We recognise the importance of drawing upon both scientific and traditional knowledge in designing adaptation strategies in ecosystem management and environmental assessment	<b>9.1 Biodiversity:</b> We will implement biodiversity management plans. At a minimum, we will seek to ensure that there is no net loss of critical habitat. Where opportunities arise to do so, we will <b>work with others to produce a net gain for biodiversity. We will incorporate</b> both scientific and traditional knowledge in designing adaptation strategies in ecosystem management and environmental assessment	Substantively unchanged. Largely stylistic changes made in sentences 3 and 4. The change in the final sentence makes the text more action orientated
	<b>9.2 World Heritage Sites:</b> We will not explore or seek to develop new mining operations in an area designated as a World Heritage Site	Unchanged
9.2 We recognise the importance of integrated land use planning. In determining our project footprint, we will give due consideration to the land access needs of nearby communities and to the preservation of biodiversity. We will aim to minimise deforestation arising from our activities.	<b>9.3 Land use and deforestation:</b> We recognise the importance of integrated land-use planning. In determining our project footprint, we will give <b>meaningful</b> consideration to the land access needs of <b>local</b> communities and to the preservation of biodiversity. We aim to minimise deforestation arising from our activities	Adjustment made from the implementing company being required to give 'due' consideration to community access needs, to requiring that they give such access needs 'meaningful' consideration

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
<p>9.3 We will plan for the social and environmental aspects of mine closure in consultation with authorities, our workforce, affected communities and other stakeholders. We will make financial and technical provision to ensure planned closure and post-closure commitments are realised, including in relation to beneficial future land-use, the preservation of water sources and the prevention of acid rock drainage.</p>	<p><b>9.4 Mine closure:</b> We will plan for the social and environmental aspects of mine closure in consultation with authorities, our workforce, affected communities and other <b>relevant</b> stakeholders. We will make financial and technical provision to ensure planned closure and post-closure commitments are realised, including in relation to beneficial future land-use, the preservation of water sources and the prevention of acid rock drainage <b>and metal leaching</b></p>	<p>Substantively unchanged except for the qualification of ‘relevant’ being applied to those stakeholders who should be consulted about mine closure and the addition, at the end, of ‘metal leaching’ as a source of risk</p>

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
<p><b>Responsible Resource Use</b>  <b>Principle 10: We will improve the efficiency of our use of water and energy recognising that the impacts of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our license to operate</b></p>	<p><b>Water, energy and climate change</b>  <b>Principle 10: we will improve the efficiency of our use of water and energy, recognising that the impact of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our license to operate</b></p>	<p>Unchanged</p>
<p>10.1 We will use water efficiently and responsibly and in co-operation with authorities and, where possible, with other users. When we operate in water-stressed areas, we will take proportionate and practicable steps to improve the efficiency of our water use and seek to reduce our water footprint including, where possible, through increased recycling</p>	<p><b>10.1 Water efficiency:</b> We will use water efficiently and responsibly and in co-operation with authorities and, where possible, with other users. When we operate in water-stressed areas, we will take proportionate and practicable steps to improve the efficiency of our water use and seek to reduce our water footprint including, where possible, through increased recycling</p>	<p>Unchanged</p>
<p>10.2 Recognising that access to water is a human right and fundamental ecosystem requirement, we will manage our operations so as to ensure that they do not adversely affect the quality of catchment water resources available to other users</p>	<p><b>10.2 Water access and quality:</b> Recognising that access to water is a human right and fundamental ecosystem requirement, we will manage our operations so as to ensure that they do not adversely affect the <b>overall</b> quality of catchment water resources available to other users</p>	<p>Substantively unchanged</p>
<p>10.3 We support the objectives of global climate accords, through avoidance, reduction or mitigation of carbon emissions. Where relevant, we will work to enhance the ability of our operations and nearby communities to be resilient to the effects of climate change</p>	<p><b>10.3 Combating climate change:</b> We support the objectives of global climate accords through avoidance, reduction or mitigation of carbon emissions. Where relevant, we will work to enhance the ability of our operations and nearby communities to be resilient to the effects of climate change</p>	<p>Unchanged</p>

Exposure Draft	Final Text	Commentary / Explanatory text
<b>Principle</b>		
10.4 We will work to improve the efficiency of our energy use and to minimise our greenhouse gas emission intensity. We will measure and report on our CO2 equivalent emissions	<b>10.4 Energy efficiency and reporting:</b> We will work to improve the efficiency of our energy use and to minimise our greenhouse gas emissions' intensity. We will measure and report on our CO2 equivalent emissions <b>in line with accepted reporting standards</b>	A clarification has been added in relation to the reporting of CO2 equivalent emissions. This should be done 'in line with accepted reporting standards'

In addition, a number of interpretative footnotes have been added including, for example, footnote 3 on the application of a mitigation hierarchy. This states that 'Implementing companies are expected to adopt a mitigation hierarchy approach whereby they seek to anticipate and avoid adverse impacts. Where avoidance is not possible, they should seek to minimise or mitigate such impacts. Where residual impacts remain, companies should compensate/offset for significant risks or impacts to workers, affected communities and the environment.'