



Comparability Report for Recognised Responsible Mining Standards under the RJC Chain-of-Custody (CoC) Standard:

Fairtrade and Fairmined Standard for Gold from Artisanal and Small-Scale Mining, including Associated Precious Metals

Introduction

The RJC Chain-of-Custody (CoC) Standard aims to support RJC Members wishing to source Materials that are the product of responsible mining. While the RJC Code of Practices is open to application by mining companies and producers of any size or scale, there are several development-focused standards that have been designed by other organisations to support the particular challenges of the Artisanal and Small-Scale Mining (ASM) sector.

This document reviews the **Fairtrade and Fairmined Standard for Gold from Artisanal and Small-Scale Mining** and recommends it for RJC Board endorsement as a 'Recognised Responsible Mining Standard' under the RJC CoC Standard. RJC invites public comment on the review and recommendation.

What is a Recognised Responsible Mining Standard?

Provision 4.1c of the CoC Standard provides scope for the RJC to formally recognise comparable mining standards. A Recognised Responsible Mining Standard is a third party standard for responsible mining practices deemed by the RJC, through a process of formal review and opportunity for stakeholder comment, to be comparable to the RJC Code of Practices.

The RJC undertakes a technical review, in cooperation with the other standard setting organisation, to evaluate the comparability of the other standard with the RJC Code of Practices. The results of the technical review are then available for a period of public review and comment. The outcomes of the public review process are then considered by the RJC Standards Committee, resulting in a recommendation to the RJC Board on whether the standard should be recognised under the RJC CoC Standard as a 'Recognised Responsible Mining Standard'.

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Acronyms

ARM	Alliance for Responsible Mining
ASM	Artisanal and Small-scale Mining
ASMOs	Artisanal and Small-scale Miners' Organisations
CoC	Chain-of-Custody
FLO	Fairtrade International (formerly Fairtrade Labelling Organisations International)
FT-FM	Fairtrade and Fairmined
LBMA	London Bullion Market Association
LI	Labelling Initiative
LSM	Large-scale Mining
PP	Production Partners
PPO	Production Organisations
OECD	Organisation for Economic Cooperation and Development
RJC	Responsible Jewellery Council
SSMO	Small-scale Mining Organisation

The **Alliance for Responsible Mining (ARM)** is an independent, global-scale, pioneering initiative established in 2004 to enhance equity and wellbeing in artisanal and small-scale mining (ASM) communities through improved social, environmental and labour practices, good governance and the implementation of ecosystem restoration practices.

Fairtrade International (FLO) represents 25 organizations working to secure a better deal for producers. From their headquarters in Bonn, Germany, they set international Fairtrade standards and support Fairtrade producers.

1. Recognised Responsible Mining Standards in an ASM context

The increasing international focus on conflict-sensitive due diligence is leading to more stringent risk management by supply chain participants. This has raised concerns that downstream supply chain participants may avoid ASM sourcing, driving ASM producers towards even more informal or even illegal supply chains. RJC aims to mitigate those impacts where possible in its own standards and continue to advance responsible practices as per its Mission.

Organisation of artisanal miners is of vital importance in order to bring improved development opportunities which address poverty. Certification systems are only feasible at an organisational level, and therefore participation in systems such as Fairtrade and Fairmined provides a strong incentive for organisational strengthening and capacity building. Formalisation and professionalization of the miners' organisation is therefore crucial, as both a pre-requisite for engaging in certification and for integrating ASM into the formal economy.

The OECD Due Diligence Guidance – draft Gold Supplement includes an Appendix 1 on suggested measures to create economic and development opportunities for artisanal and small-scale gold miners, to minimise their risk of marginalisation. It encourages supply chain participants and stakeholders to collaborate to support responsible mining and trading that avoids conflict and human rights abuses; the establishment of chain of custody systems for the ASM sector; and promotion of programs that competitively market ASM gold.

The RJC wishes to support the OECD Gold Supplement recommendations and enable its CoC Standard to be an additional pipeline to formal markets for ASM producers that demonstrate responsible mining practices. The Fairtrade and Fairmined is a landmark mining standard for the ASM gold sector and is the first standard to be considered as a 'Recognised Responsible Mining Standard' under RJC's CoC initiative.

2. Summary of the Fairtrade and Fairmined Standard for Gold from Artisanal and Small-Scale Mining, including Associated Precious Metals

The Fairtrade and Fairmined certification scheme for responsibly mined gold from artisanal and small-scale mines is the result of a joint effort between Fairtrade International and the Alliance for Responsible Mining (ARM). The standard is aimed at creating opportunities for economically disadvantaged artisanal miners and their communities through product certification and engagement with consumers. Gold and associated precious metals (platinum and silver when mined as a by-product in small quantities) from artisanal and small scale miners is defined as hard-rock or alluvial gold mined by an artisanal and small-scale mining operation. Associated precious metals – platinum and silver – may also be produced under the standard as a by-product of artisanal mined gold. The standard sets out minimum requirements for certification and incentivises higher environmental practices with an additional Ecological Gold premium (for alluvial gold that can be gravity processed without cyanide or mercury).

The Fairtrade and Fairmined standard applies to 'Artisanal and Small-scale Miners Organisations' (ASMO). ASMOs are member-based organisations of artisanal producers and have the responsibility for Fairtrade certification. ASMO's are audited by the independent international certification body FLO-CERT to ensure they are complying with the standards. Certified gold is dual labelled with the FAIRTRADE Mark and Fairmined Mark.

All traders in the supply chain of a certified product have to be either registered with FLO-CERT, the independent auditor body of the Fairtrade system or their local Labelling Initiative (LI). Those registered with an LI are considered licensees, and are responsible for placing the dual stamp (applied to the actual product) and use of the dual label. All are required to report against the requirements in Section B of the FT-FM Standard for traders. In addition, licensees must have their products certified, artwork approved and pay a license fee which funds both support to ASMOs but also account management and market development. Those registered with FLO-CERT are charged an annual audit fee.

Achieving Fairtrade and Fairmined Certification means that the miners:

- Receive a guaranteed Fairtrade Minimum Price. This is set at 95% of the London Bullion Market Association's (LBMA's) fixing at the FOB export point.
- Receive a Fairtrade premium payment, which is democratically reinvested in community projects and improving miners' operations. This is calculated as 10% of the applicable LBMA fixing¹.
- Have the opportunity to develop long term business relations with their commercial partners.
- Can earn an additional Ecological premium when they recover gold through gravity only, without the use of mercury or cyanide. In addition, they must ensure minimum ecological disruption and forest restoration from the outset of new operations. The Ecological premium is calculated as 15% of the applicable LBMA fixing (to be reviewed in 2012).

At March 2012, there are four Fairtrade and Fairmined certified ASMOs, a further two are undergoing auditing and work has started with three more ASMOs, all together representing 2,000 miners and impacting around 8,400 persons. Currently certified ASMOs are the Cotapata Mining Co-operative in Bolivia, the SOTRAMI Mining Organisation in Peru and two communities who sell through the Oro Verde brand in Colombia. The current geographical scope of ASMOs in the standard is Latin America, however a standards review in 2012 is seeking to extend this to Asia and Africa from 2013 onwards.

3. Overview of the Fairtrade and Fairmined Standard

Table 1 provides a top-level view of the RJC Code of Practices, the RJC Chain-of Custody Certification and the Fairtrade and Fairmined Standard, in order to compare the key features of each standard.

¹ The standard is being reviewed in 2012, with the aim of extending the geographical scope and to use certification and audit experience to ensure it is fit for purpose and in line with the ARM/FLO partnership's strategic objectives.

For more information on the RJC Code of Practices and RJC Chain-of-Custody Certification, please visit <http://www.responsiblejewellery.com>. For more information on the Fairtrade and Fairmined Standard, please visit <http://www.communitymining.org/index.php/en/fairtrade-and-fairmined-standard>, <http://www.fairtrade.net/gold.html> or <http://www.fairgold.org>.

Table 1 – Key Features of RJC Code of Practices, RJC CoC Certification and Fairtrade and Fairmined Standard

Issue	RJC Code of Practices (CoP)	RJC CoC Certification	FT- FM Standard
Key issues	The COP defines responsible ethical, human rights, social and environmental practices for businesses in the Diamond and/or Gold Jewellery supply chain.	To support businesses which wish to provide their customers and stakeholders with independent assurance about conflict-free, responsible sourcing.	To create market access opportunities for economically disadvantaged artisanal miners and their communities, through transparent supply chains.
Applicable to	RJC Members, which are businesses that join RJC and commit to RJC Member Certification.	RJC Members or Entities under the Control of a Member, that elect for CoC Certification; including any Outsourcing Contractors that fall within their CoC Scope	Artisanal and Small-scale Miners’ Organisations
Objective, aim and vision	<ul style="list-style-type: none"> • Provide a common standard for RJC Members that builds on international standards for responsible business practices. • Set out the mandatory expectations for the establishment, implementation and maintenance of policies, procedures and practices in order to manage issues within a Member’s control. • Establish provisions that can be independently audited to provide objective evidence for the granting of RJC Certification • Drive improvement of business practices for the Gold and or/Diamond Jewellery supply chain. 	<ul style="list-style-type: none"> • Support responsible mining practices • Source legitimate recycled materials • Identify the provenance of jewellery materials • Avoid ‘conflict’ resources implicated in human rights abuses, illegal or criminal practices • Enhance reputation through responsible sourcing • Carry out due diligence of the supply chain • Respond to the requests of customers, both business to business and retail. 	<ul style="list-style-type: none"> • Promote formalisation of ASM sector • Improved conditions for producers • Strengthened producer organisations • Improved environmental management • Gender equality • Elimination of child labour • Improved market access • Empowerment and democratic organisation • Benefits to local communities in mineral rich ecosystems • Improved governance to this sector • Provenance of product to consumers
Mechanisms	RJC Code of Practices.	The RJC CoC Standard, supported by the RJC Code of Practices and other recognised standards	The FT-FM Standard as developed by FLO + ARM

Which jewellery materials?	Gold and diamonds. Platinum group metals (platinum, palladium, rhodium) to be formally added in 2012.	Gold and platinum group metals (platinum, palladium, rhodium). Diamonds are under further consideration during 2012.	Gold and associated precious metals (silver and platinum as gold by-products)
Type of Eligible Material	Not relevant to Code of Practices - see CoC Standard.	<p>Mined: Mining Facilities that are within its CoC Certification Scope; Mining Facilities in which it holds a legal interest and are within the CoC Certification Scope of another CoC Certified Entity; Miners or producers certified under a Recognised Responsible Mining Standard; ASM producers operating on the Entity's Mining Facility concessions that have participated in initiatives that enable the professionalization and formalisation of ASM ; processing residues that contain trace Precious Metals from which Mining Byproduct can be extracted.</p> <p>Recycled: from Recyclable Materials sourced from suppliers screened according to Know Your Customer requirements to avoid Illegitimate Sources.</p> <p>Grandfathered: historical stocks with records that demonstrate they were produced before 1 January 2012.</p> <p>Mix of Mined, Recycled or Grandfathered: to accommodate bulk-commodity chain-of-custody models.</p>	<p>Mined: produced by certified ASMOs and processed and traded according to the Standard.</p> <p>Fairtrade and Fairmined gold and associated precious metals must be from areas for which the ASMO possesses the mining rights (mining concessions, mining lease, exploitation contract, or equivalent denominations according to national legislation), and owns or has agreed the land use rights with the land owner.</p>
Voluntary?	<p>RJC Membership is voluntary.</p> <p>RJC Commercial Members must achieve Member Certification within 2 years, as a condition of membership.</p>	<p>Participation by RJC Members is voluntary and is not a requirement of RJC Membership.</p> <p>Entities seeking RJC CoC Certification must be RJC Members, or under the Control of an RJC Member, to support the Council's mission of responsible business practices.</p>	Taking part in the Fairtrade and Fairmined certification system is a voluntary decision for miners and supply chain players.

Third-party audited?	Yes. Every 3 years if no Major Non-Conformances, or after 1 year if any Major Non-Conformances found, to verify corrective action.	Yes. Certification Audit followed by Surveillance Audit within 12-18 months if no Major Non-Conformances. Re-certification every 3 years.	All operators in the supply chain, from the certified mining organisations through to the licensees selling the consumer-ready product, must be registered by one of Fairtrade International's Labelling Initiatives and/or by FLO-CERT. All registered operators are subject to independent on-site audits to ensure compliance with the Fairtrade and Fairmined Standards. ASMO audits are held annually. For more details on the process visit www.flo-cert.net .
Geographical Scope	Global	Global	Latin America, scope extension to Africa and Asia 2013 onwards for ASMOs (tbc). For traders the standard is global.

4. Review of Comparability

RJC in cooperation with ARM and Fairtrade conducted a review of the comparability of the Code of Practices and the Fairtrade and Fairmined Standard for Artisanal and Small-Scale Gold Mining. Table 2 summarises the findings. **For more detail on the links between each topic area, see Appendix 1.**

Table 2 – Review of Comparability to Provisions in the RJC Code of Practices

Aligned	Comparable	Not directly addressed	Not applicable
Money Laundering and Finance of Terrorism	Human Rights	Bribery and Facilitation Payments	Kimberley Process
Product Integrity	Health and Safety	Product Security	Extractive Industries Transparency Initiative
Child Labour and Young Persons	Working Hours	Use of Security Personnel	Artisanal and Small-scale Mining
Forced Labour	Remuneration	Use of Energy and Natural Resources	Policy
Freedom of Association and Collective Bargaining	General Employment Terms		Business Partners
Discrimination	Indigenous Peoples		Impact Assessment
Discipline and Grievance	Environmental Protection		

Procedures			
Community Engagement and Development	Hazardous Substances		
Legal Compliance	Waste and Emissions		
	Biodiversity		
	Mine Closure Planning		
	Sustainability Reporting		

The following criteria were used to determine comparability:

- **Aligned:** The FT-FM Standard appears to have equivalent (or higher) requirements to the CoP.
- **Comparable:** The FT-FM Standard appears to take a different approach that achieves a comparable impact to the CoP, thus resulting in improvement to conditions and practices in the ASM sector.
- **Not directly addressed:** The FT-FM Standard does not make specific requirements on an issue covered by the CoP.
- **Not applicable:** This provision of the CoP has a low level of relevance to the improvement of basic conditions and practices in the ASM gold sector.

Table 2 shows there is a high degree of comparability between the RJC Code of Practices and the FT-FM Standard. Out of 25 applicable provisions of the Code of Practices, 21 are either “Aligned” or “Comparable”, as defined above. A further 6 were determined to be “Not Applicable” to the ASM gold sector.

Section 5 below discusses the 4 provisions of the Code of Practices not directly addressed by the FT-FM Standard.

5. Provisions not directly addressed

Drawing from the review of comparability, the following provisions are not directly addressed in the Fairtrade and Fairmined Standard:

- Bribery and Facilitation Payments
- Product Security
- Use of Security Personnel
- Use of Energy and Natural Resources

The above provisions covered by the RJC CoP are specifically designed for formalised businesses and facilities to promote responsible ethical, social and environmental practices throughout the jewellery supply chain. As the overall objective of the Fairtrade and Fairmined Standard is to promote the formalisation of the ASM sector, the provisions in the Standard address issues that are

a priority for an ASM context. Relevant issues include: improved working conditions for producers, strengthened producer organisations with the capacity to promote a responsible ASM sector, improved environmental management, gender equality, progressive elimination of child labour in mining, improved market access, benefits to local communities, and improved governance to this sector.

As the Fairtrade and Fairmined Standard was launched on March 15, 2010, it is still in its early stages. The provisions that are listed as ‘not directly addressed’ are currently out of the scope of the FT-FM Standard due to their lower level of relevance and/or priority for the ASM sector. Primary efforts of the FT-FM Standard have been focused on development improvements in organisational capacity to support implementation of the Standard. Considering the positive impact that the Fairtrade and Fairmined Standard already has in creating opportunities for disadvantaged artisanal miners and their communities, and improving working conditions and environmental impacts, the RJC anticipates that these provisions may well be addressed in another stage of formalisation and professionalization of ASM.

In 2012, ARM and FLO will be undertaking a review of the FT-FM Standard. The objectives of the project are to review current standards and compliance criteria to improve facilitation of artisanal and small scale miners’ market access and sustainable development of livelihoods. Stakeholders are encouraged to contribute to the review and more information can be found at www.fairtrade.net and www.communitymining.org.

6. Review Recommendation

The review of the Fairtrade and Fairmined Standard has found it to be comparable to the RJC Code of Practices in its impact on its target audience, artisanal and small-scale miners. The benefits of improved labour and environmental conditions for workers, economic support and better access to markets should create positive feedback for participating ASMOs. The Fairtrade and Fairmined Standard contributes to the formalisation and professionalization of the ASM sector which is crucial for minimising the risk that artisanal miners are further marginalised from the supply chain. The Standard is also of value to downstream companies in the gold supply chain that wish to support and promote responsible artisanal mining.

As a ‘Recognised Responsible Mining Standard’ under the RJC CoC Standard, the main outcome would be that CoC Certified Refiners are encouraged to source from FT-FM Certified ASM producers, [encouraging a scaling up of support for ASM certification]. The FT-FM Certification would:

- Provide an independent assessment of ASM mine sites that would form part of a refiner’s due diligence (as articulated in the OECD Due Diligence Guidance – Gold Supplement: Step 4 and Appendix 1). This would support Provision 10 of the RJC CoC Standard which calls for due diligence of all gold sources by CoC Certified Refiners.
- Enable gold sourced from FT-FM Certified producers to be declared as CoC Gold, which may be mixed with other Eligible sources (Eligible Mined, Recyclable and Grandfathered Gold). This supports improved market access for ASM producers and provides additional access to chain-of-custody pathways. **Note:** Gold from FT-FM Certified producers taken through an

RJC CoC pathway cannot be labelled as Fairtrade-Fairmined without additionally complying with the registration, licensing and audit requirements of the Fairtrade system.

Recommendation:

The RJC proposes that the Fairtrade and Fairmined Standard be recognised under the RJC Chain-of-Custody Standard as a 'Recognised Responsible Mining Standard' and therefore Eligible Material for CoC Transfers.

Stakeholder comments are sought and will be considered by the RJC Standards Committee and Board in its decision-making process.

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Appendix 1 – Detailed Review of Comparability

RJC Code of Practices Provision	Fairtrade and Fairmined Standard	Comment
1.2 Money Laundering and Finance of Terrorism	Aligned 1.2 Fairtrade adds to development	FT-FM 1.2.3 states that revenues of the ASMO and its PPs must not be used directly or indirectly to finance or support illegal activities or armed conflicts.
1.5 Product Integrity	Aligned	Covered under the FT-FM mark.
2.2 Child Labour and Young Persons	Aligned 4.4 Elimination of Child Labour <i>FT-FM follows ILO Conventions 138 and 182.</i>	FT-FM 4.4.3 is a specific requirement that relates to ASM. FM-FM 4.4.5 and 4.4.6 are progressive requirements that form part of the development plans for ASMO.
2.3 Forced Labour	Aligned 4.2 Freedom of Labour <i>FT-FM follows ILO Conventions 29 and 105.</i>	FT-FM 4.2.2 is an example of forced labour relating to ASM that falls under ILO Convention 29 and/or 105.
2.4 Freedom of Association and Collective Bargaining	Aligned 4.5 Freedom of Association & Collective Bargaining <i>FT-FM follows ILO Conventions 87 and 98.</i>	FT-FM 4.5.4 – 4.5.6 set more specific requirements for ASMO, PP and SSMOs to encourage workers to democratically elect a workers' committee.
2.5 Discrimination	Aligned 1.4 Non-Discrimination 4.3 Freedom from Discrimination <i>FT-FM follows the Universal Declaration of Human Rights on ending discrimination and ILO Conventions 100 and 111.</i>	FT-FM 1.4.1-1.4.2; 4.3.4 & 4.3.5 are progressive requirements to provide same opportunities in all areas of mining activity, equal representation of women and support for pregnant & breastfeeding women.
2.7 Discipline and Grievance Procedures	Aligned 1.2 Fairtrade adds to development 4.3 Freedom from Discrimination	The ASMO needs to have a Grievance Procedure in place for human rights and environment, which includes a due diligence process.

	<i>FT-FM follows Convention 100 and 111.</i>	
2.11 Community Engagement and Development	Aligned 1.2 Fairtrade adds to development 2.1 Fairtrade Benefits	RJC CoP and FT-FM are share similar objectives. However the FT-FM Standard is designed to make a direct difference in development and quality of life for artisanal and small-scale miners and the communities where they live (FT-FM 1.2 and 2.1). The ASMO plays an active role in planning and promoting local sustainable development. More importantly, the Fairtrade Premium is particularly designed as a tool for community development, supporting the organisation to realise their development objectives as laid down in their development plan.
4.1 Legal Compliance	Aligned	The FT-FM Standard states that producer organisations always abide by national legislation unless that legislation sets standards which are below the referenced internationally recognised standards and conventions, in which the international standards prevail.
2.1 Human Rights	Comparable 1.4 Non-Discrimination and stated in 0.4 References	The FT-FM Standard declares that Responsible ASM is based on the Universal Declarations of Human Rights.
2.6 Health and Safety	Comparable 4.7 Health and Safety Conditions in the Workplace 4.8 Social Protection <i>FT-FM adheres to ILO Convention 155 and 176.</i>	FT-FM has a number of minimum requirements that correspond with CoP but there are a number of provisions that are not mentioned in the FT-FM Standard. Provision 2.6 is more prescriptive than FT-FM 4.7 & 4.8 which does not, and cannot be corresponded to in an ASM context. However, the minimum requirements of the FT-FM Standard help to achieve the same objectives in the ASM as the CoP does in the formal sector.
2.8 Working Hours	Comparable 4.6 Conditions of Employment <i>FT-FM follows ILO Conventions 100 and 110.</i>	FT-FM is not as detailed on working hours as the CoP, but includes progress requirements for working hours and overtime regulation.

2.9 Remuneration	<p>Comparable</p> <p>4.6 Conditions of Employment <i>FT-FM follows ILO Conventions 100 and 110.</i></p>	<p>FT-FM 4.6.2 is a minimum requirement that payment is made regularly and in a timely manner, in legal tender and properly documented.</p>
2.10 General Employment Terms	<p>Comparable</p> <p>1.3 Democracy, Participation and Transparency 4.6 Conditions of Employment <i>FT-FM follows ILO Conventions 100 and 110.</i></p>	<p>FT-FM 4.6.4 notes that all permanent workers must have a legally binding written contract of employment.</p>
2.13 Indigenous Peoples	<p>Comparable</p> <p>1.2 Fairtrade adds to development</p>	<p>FT-FM 1.2.2 states: ‘The mining operations are conducted with the agreement of the legal and traditional local community authorities. The ASMO has a Grievance Procedure for human rights and environment in place, which includes a due diligence process’.</p>
3.1 Environmental Protection	<p>Comparable</p> <p>3. Environmental Development</p>	<p>FT-FM Standard sets out specific requirements aimed at the protection of the local environment and it promotes improved environmental management practices by miners apart from requiring compliance with national environmental laws (3.2.1) and elaboration of environmental mitigation plans in case of technological change (3.2.5)</p> <p>For Ecological Gold the FT-FM Standard requires that ecological disruption due to mining is minimised through an environmental management plan that ensures that the local ecosystem is not placed beyond capacity to recover (3.3.2) .</p>
3.2 Hazardous Substances	<p>Comparable</p> <p>3.1 Management of Toxic Substances 3.3 Ecological Gold and Premium</p>	<p>The FT-FM Standard sets requirements for safe management of toxic substances. The Ecological Premium is offered to ASMOs who eliminate mercury and cyanide altogether.</p>
3.3 Waste and Emissions	<p>Comparable</p> <p>3.1 Management of Toxic Substances 3.2 Ecological Restoration and Ecosystem Health</p>	<p>FT-FM 3.2.8 and 3.2.9 set requirements for tailings which must not be discharged into water bodies or where they can reach water bodies, and the disposal of tailings, waste water and chemical waste</p>

		<p>must be properly planned and carried out by experienced persons. Waste management must be documented on identified risks and planned within set timelines, measures and action points, to be documented by the organisation.</p> <p>FT-FM 3.2.1 states that all mining operations and processing plants must comply with national environmental laws.</p>
3.5 Biodiversity	<p>Comparable 3.2 Ecological Restoration and Ecosystem Health</p>	<p>Requirements regarding designated protected areas or archaeological heritage areas (3.2.2) allow only for continuation of existing operations with 10-year positive track record. Progressive requirements 3.2.9 & 3.2.10 look at Good Waste Management practices and intervened areas must be rehabilitated and re-vegetated. The practices required under FT-FM represent a comparable positive impact in ASM sectors.</p> <p>For ECO-FT-FM Gold the FT-FM Standard requires that rehabilitation of the native ecosystem takes place from the outset of new operations (3.3.3).</p>
4.5 Mine Closure Planning	<p>Comparable 3.2 Ecological Restoration and Ecosystem Health</p>	<p>FT-FM 3.2.6 states that open and underground mine apertures created by the ASMO must be refilled or blocked sufficiently after termination of the mining activity.</p>
4.6 Sustainability Reporting	<p>Comparable</p>	<p>ASMOs report to FLO instead.</p>
1.1 Bribery and Facilitation Payments	<p>Not directly addressed 1.3 Democracy, Participation and Transparency</p>	<p>FT-FM does not have a provision on bribery and facilitation payments as such. However, the ASMO has a legal, transparent and democratic organisational structure in place. Also, the ASMO's annual report, budgets and accounts must be presented in an understandable and clear manner for all, to and approved by the General Assembly.</p> <p>1.6.11 of the FT-FM Criteria List of FLO-CERT notes that 'there is an administration in place that allows for transparent management of finances'.</p>

1.4 Product Security	Not directly addressed	FT-FM Standard Section B for trading and processing 5.1.5 states that the ASMO and buyer will draw up a contract that must include 'delivery conditions'. Also, 5.1.7 states that 'shipment orders must specify the quantity and purity of metal per shipment'. The contract coincides with RJC CoP 1.4 product security.
2.12 Use of Security Personnel	Not directly addressed	FT-FM does not mention the Use of Security Personnel.
3.4 Use of Energy and Natural Resources	Not directly addressed	This provision is more aimed at LSM and therefore less relevant to ASM. FT-FM Standard does have requirements for pollution which are more relevant in an ASM context.
1.3 Kimberley Process	Not applicable	The Kimberly Process is related to diamonds and the FT-FM Standard only certifies gold.
1.6 Extractive Industries Transparency Initiative	Not applicable	The EITI has been largely designed for LSM, concerning transparency of large flows of income to governments.
2.14 Artisanal and Small-scale Mining	Not applicable	The FT-FM Standard is directly aimed at Community Based Artisanal and Small-scale Miners.
4.2 Policy	Not applicable	This relates to the RJC Code of Practices and therefore not applicable to FT-FM Standard.
4.3 Business Partners	Not applicable	This only relates to business partners in formalised business context and therefore not applicable to ASM.
4.4 Impact Assessment	Not applicable	Impact assessment relates to the earliest/exploration stage of a new mining project and FT-FM works with existing mining groups.