

Dear representatives of IRMA,

Finnwatch would like to thank for the opportunity to participate in the 2nd public consultation round of the revised IRMA standard. We are a Finnish business and human rights organization that has studied the human rights impacts of mining in the Global South. We have focused on the parts of the revised IRMA standard based on the aspects that have emerged from our own research, focusing on 3.1.1 Human Resources Policy, 3.1.10 Wages, Benefits, and Other Compensation and 3.2.10 Workers' Housing.

3.1.1 Human Resources Policy

In Indonesian industrial parks focused on mining and mineral processing it is a common practice to transfer workers from one employer to another without workers' consent (see for example a [report on IMIP](#), pages 33-39). This practice should be explicitly forbidden in the IRMA standard.

3.1.10 Wages, Benefits, and Other Compensation

We suggest that instead of a vague requirement on "credible methodology" IRMA would require use of [Global Living Wage Coalition's](#) Anker-methodology when defining living wage. GLWC is supported by the ISEAL Alliance. Alternatively, if IRMA maintains the requirement to use credible methodology, criteria for what makes a methodology credible should be established and verifying the methodology should be included in the scope of audits. Criteria for methodology should include a definition of a living wage based on international human rights standards and elements such as genuine stakeholder consultation on the tentative results of the calculation.

Living wage is a human right and all workers need to be paid at least the applicable living wage, regardless of whether they are covered by a possible CBA or not. Many trade unions organizing workers in the Global South are not in a position to negotiate adequate wages.

As a general comment we note that in many sections of the standard "freely negotiated" CBAs are provided as a reason to weaken the workers' protection (see for example section on rest times). It should be noticed that many of the trade unions organizing workers in the global south are weak. There is also corruption in the unions as well as yellow unions. We would also like to stress that it is very difficult to assess whether something has been "freely negotiated" or not. CBAs should not be an excuse to violate workers rights.

3.2.10 Workers' Housing

Instead of focusing only on provided housing, the IRMA standard should also include an assessment of whether the Entity should be providing housing to workers. In our own research we have found situations where a mining company (situated in a remote area without proper infrastructure) has not provided housing to workers although the state has advised this through instruments such as Social and Labour Plans or industry standards. For example in South Africa there are documented cases of inhumane housing around mining companies, see for example [Finnwatch report on Sibanye-Stillwater in Marikana](#) (Chapter 3.5).

Unrelated to the standard consultation we would also like to bring to your attention that it has been very difficult for us to take part in stakeholder consultation during an IRMA audit. We have several times approached the auditor (ERM CVS) responsible for auditing Sibanye-Stillwater Marikana mine. We have not received any response to our messages. We have sent an email to the provided address post@ermcvs.com on 7th of August 2024, 29th of August and 11th of November 2024. We also know that local stakeholders in South Africa have approached the auditor without getting a response.

We hope this feedback can help you improve the IRMA standard and its processes. Our comments can be made public.