

RMI procedure to develop and maintain standards in the mica value chain

Introduction

The purpose of this document is to detail the rules that the Responsible Mica Initiative (RMI) has set up and which will govern the development and the maintenance of the standards RMI has developed or wishes to develop in the mica value chain.

The Responsible Mica Initiative was founded in 2017 (RMI - www.responsible-mica-initiative.com) where multiple organizations jointly commit to eradicating child labor and unacceptable working conditions upstream of mica supply chains in India and Madagascar.

RMI members are implementing responsible sourcing practices and developing local engagement to eradicate child labor and improve the livelihoods of mining communities. They also contribute to the development of a clear and fair legal framework to strengthen mica supply chains. To this end, the RMI has developed a framework of principles and actions for responsible and sustainable mica supply chains, a set of tools to support these principles and actions, and a governance system that enables its members to comply with these principles, act accordingly, and monitor their performance over time.

As part of these tools and principles, the Responsible Mica Initiative has already developed two standards:

- The Global Workplace ESG and Due Diligence Standard for Mica Processors (first version published in March 2021). This standard was developed in partnership with the Responsible Minerals Initiative.
- The MICA CRAFT (first version published in July 2024), which aims to set criteria defining responsible mica production in artisanal and small-scale mines (ASM). This standard was developed in partnership with the Alliance for Responsible Mining.

The Responsible Mica Initiative strongly believes that both the Global Workplace ESG and Due Diligence Standard for Mica Processors and the MICA CRAFT will guide the improvement of working conditions and human rights for mica artisanal miners through the implementation of responsible workplace practices in upstream sites of the mica value chain.

Initially focused on India, RMI's work was then extended to Madagascar in 2022 with the aim of implementing these responsible sourcing and local engagement practices to support the eradication of child labor, improve the livelihoods of communities within formalized mica supply chains, and strengthen the supply chain governance. RMI witnesses an increasing number of countries where mica is mined and wishes its standards to be applicable not only in geographies where RMI is currently present but also in all countries where these documents could help build a strong framework defining the goal towards which mica miners, exporters and processors should aim.

The present document aims to detail the general principles that RMI accounts for in developing its standards, as well as in maintaining them.

1. Five core principle to develop a standard

1.1. First core principle: “not reinventing the wheel”

On one hand, the Responsible Mica Initiative (RMI) believes that the mica industry is quite unique due to several factors: the low value of mica at the mine level, local challenges in producing countries such as the illegality of mica mining in India, the lack of resources for local states to

enforce regulations, and the vulnerability of the communities involved in mica mining and picking. Therefore, RMI sees the necessity for developing specific standards to cover mica mining, mica picking, and mica processing.

On the other hand, RMI is aware of the potential issues arising from the proliferation of standards. Consequently, the initiative has always prioritized mapping existing standards before developing new ones. If existing standards are found to be adaptable to the mica context, RMI promotes these standards to its members and their supply chain partners instead of developing new ones.

If existing standards are deemed relevant but insufficiently suitable for the mica context, RMI prioritizes co-developing a standard specifically for the mica industry. This involves engaging with the standard-setting bodies to adapt the existing standard by incorporating specific elements pertinent to the mica industry, possibly resulting in a new standard based on the existing one.

If no existing standard is found to be sufficiently relevant to the mica industry, as a last resort, RMI would develop a new standard from scratch.

Finally, RMI believes that field visits and an in-depth understanding of the local context are irreplaceable. Therefore, RMI organizes these visits and develops local knowledge before creating standards.

1.2. Second core principle: “think global”

The Responsible Mica Initiative believes that all mica mining and processing sites should adhere to the same responsible workplace practices, regardless of their geographical location. Therefore, RMI prioritizes the development of global standards and, where relevant, creates local implementation guides that detail specific local conditions.

RMI's global approach extends beyond geographical considerations to encompass a wide and global range of stakeholders. The standards developed by RMI aim to be as inclusive as possible, involving a diverse array of stakeholders in the steering committees, including NGOs, international organizations, and companies from the entire mica value chain. RMI also leverages its extensive membership base, which spans the whole mica value chain, inviting members to comment and share their thoughts during the standard development process.

To ensure a truly global standard development process, RMI includes a phase of public consultation for any new standard.

Finally, once a standard is established, RMI publishes it and makes it publicly available to ensure maximum global outreach.

1.3. Third core principle: “ensure progressivity and accessibility”

The Responsible Mica Initiative is aware of the limited capacity of mica upstream companies to swiftly and efficiently implement responsible workplace practices. Several factors contribute to this challenge: the relatively low price of mica paid to miners and processors, the lack of knowledge and expertise among these actors, and the limited resources historically available in the mica industry.

RMI believes local actors with limited capacity must find the requirements accessible enough to embark on the standard implementation journey.

For these reasons, RMI endeavors to develop standards that are progressive and accessible for local upstream actors. Progressivity is incorporated by including initial requirements with lower expectations directly in the standards, gradually inviting local actors to implement increasingly stringent requirements. Additionally, the implementation guides or support documents for the standards provide a progressive implementation approach, categorizing requirements into different levels of criticality (e.g., Zero Tolerance, Major, and Minor criteria). Local actors are then encouraged to prioritize the most critical requirements and gradually address the less critical ones¹.

1.4. Fourth core principle: “develop and maintain”

The Responsible Mica Initiative believes that the entity setting the standard should also be responsible for its maintenance. If the standard is co-developed by multiple entities, then all involved parties should participate in the standard's revision and maintenance processes post-development.

RMI emphasizes that the standard should closely align with the evolving context of mica sourcing and responsible sourcing in general. Given the rapid pace of change in this context, regular revision cycles are necessary. These cycles should be led by the standard setter and maintainer, involving relevant stakeholders such as Steering Committee members, RMI members, and international organizations.

These revision cycles should occur at least every three years following the initial publication of the standard. Any relevant stakeholder might ask the Responsible Mica Initiative for an earlier revision of the standard, through the grievance mechanism available on RMI website or by contacting the RMI Executive Team. The suggestion will then be pushed to the Steering Committee which will decide on the relevance of the demand. Should the demand be received by the Steering Committee, then the revision process will start and will follow the same three-step process described in section 3.4 of this procedure.

1.5. Fifth core principle: “accompany”

Finally, the Responsible Mica Initiative (RMI) believes that a standard cannot be effectively implemented without a support structure to assist actors, especially those with limited resources and capacities.

To address this, RMI has developed an accompaniment program aimed at local actors such as mica miners, pickers, exporters, and processors. This program includes training sessions, introductions to the standard, implementation support, events for sharing best practices, preparation for external third-party audits, assistance during audits, and help with implementing corrective action plans. RMI deploys local teams in the countries of operation, focusing on providing this comprehensive support.

¹ The Global Workplace ESG and Due Diligence Standard for Mica Processors includes three criticality levels: Zero Tolerance, Major and Minor criteria. Processors must comply with Zero Tolerance and Major criteria within the first year of membership or have a corrective action plan in place for Major criteria. Minor criteria do not have any associated timeline. The Mica CRAFT includes intermediary requirements on top of original CRAFT requirements, and a transition period granted to mica ASM groups to implement these intermediary requirements. At the end of the transition period, mica ASM groups must comply with the original CRAFT requirements.

As part of the accompaniment program, self-assessment tools shall be provided to local actors so that they have the capacity to self-monitor their progress with regards to the implementation of responsible workplace practices. As well, external assessment carried out by third-party auditing agencies shall be facilitated or coordinated by RMI and results be used as the basis to set corrective action plans and progress toward the implementation of the standards' requirements.

2. Responsibilities of the Standard Maintainer

The standard maintainer is responsible for:

- Updating the standard as well as managing different versions of the standard, tracking changes, and communicating updates to stakeholders,
- Maintaining clear and comprehensive documentation that outlines the specifications, guidelines, and requirements of the standard as a reference for those implementing the standard,
- Facilitating a review process involving experts and stakeholders so that it can ensure that the standard is accurate, relevant, and aligned with the needs of the industry or field,
- Publishing and distributing the standard: once a standard is approved, maintainers oversee its publication and distribution,
- Promoting the adoption of the standard within the industry and the community of practitioners,
- In cases of disagreements or conflicts regarding the interpretation or application of the standard, maintainer may facilitate discussions and reach a consensus and provide clarifications or issue official interpretations to address ambiguities,
- Collaborating with other organizations, standard-setting bodies, and experts in related fields,
- Ensuring that the standard's content is accurate, reliable, and of high quality,
- Developing long-term strategies for the evolution of the standard, considering how it will adapt to future advancements and industry changes.

3. Role and Responsibilities of the Steering Committee

3.1. Purpose of the Steering Committee

The Steering Committee is created by the Responsible Mica Initiative Executive Team and its members.

The Steering Committee will guide and support the development of the standard by:

- Providing technical input and guidance based on expertise and experience for the development or revision of the assigned standard and request additional research if applicable,
- Sharing opinions and perspectives on the benchmark main conclusions,
- Challenging the performance of the mission,
- Agreeing on internal operating practices, timelines and responsibilities of the Committee and of individual Committee members,
- Overviewing the standard setting and eventual standard testing procedures,
- Reviewing the proper stakeholder involvement during public consultations,

- Advise RMI on all matters regarding the content of the assigned standard and related relevant supply chain, downstream and commercial issues to ensure highest quality, consistency and continuous improvement,
- Approving and endorsing the intermediary and final versions of the standard,
- Supporting the external communication of the standard.

3.2. Composition of the Steering Committee

One objective under the Steering Committee is to gather insights from various stakeholders and rightsholders related to relevant steps of the mica value chain, contributing to collectively build a balanced and complementary critical review of the development process of the standard.

The Steering Committee should consist of a maximum of 25 members plus the RMI Executive Team. The total should always be made up by an odd number of individuals.

The Steering Committee must always combine balanced expertise from different aspects of the relevant steps of the mica value chain: artisanal and small-scale mining, processing, ... A diverse, multi-stakeholder composition of the committees is crucial to ensure the legitimacy, applicability and technical quality of the standard.

As much as possible, the Steering Committee will regroup representatives from, but not exclusively, mining, collection and export operations, local civil society actors, international organizations (NGO, intergovernmental organizations), downstream companies and local government representatives.

It is encouraged but not mandatory in exact numbers, to establish the following composition:

- 1/3 supply side. It is encouraged to have the participation of a woman miner to represent the challenges of the sector from a gender-balanced point of view,
- 1/3 demand side and downstream supply chain,
- 1/3 thematic or sectorial experts,
- the RMI Executive Team.

In any case and mandatory,

- neither stakeholder group shall have a majority (+50%) in the Steering Committee,
- representatives of ASM miners must always be included when developing a standard for mica ASM.

Objections against the composition of a Steering Committee can be presented, if it does not represent the required balance of interests.

Participation in the Steering Committee is on a voluntary basis. While a stand-alone meeting is not anticipated and a web-based option will be provided for calls, any direct costs that may be incurred are the responsibility of the participants to the Steering Committee.

3.3. Prerequisites for the Steering Committee

Members of the Steering Committee are expected to:

- Be familiar with this specific RMI Standard Development Procedure,
- Share RMI's mission and vision and demonstrate high ethical commitment to establish fair, sustainable, responsible (mica) supply chains,

- Represent their stakeholder group, including but not exclusively the interest of their institutions. Members are expected to keep their respective organizations updated on the work undertaken and to be fully aware of their participation in the Steering Committee,
- Declare all conflicts of interest at nomination and before taking part of decision-making processes,
- Have specific interest, proven expertise and broad experience on the topics related to the standard,
- Contribute in a constructive way to the standard development and evolution,
- Regularly participate to the Steering Committee meetings,
- Properly prepare for meetings and contribute to all follow-up actions as agreed and/or mentioned in the meeting minutes.

3.4. Steering Committee Meetings

The Steering Committee will meet at least three times along the development of the standard:

- During a kick-off meeting, the Steering Committee is launched and informed on the first achievements of the standard development process.
- During a first review, the first draft of the standard is presented to the Steering Committee. The foundations of the first draft (field visits, benchmark of existing standards, preliminary structure and writing) are especially challenged and validated.
- At the end of the project, the Steering Committee validate the final version of standard that would include the feedback from the external public consultation period.

Meetings will take place in English. A French translation, if needed, will be provided by RMI team, live during meetings.

Any other meeting required for the holding of the desired discussions and the proper development of the standard may be organized, according to needs or requests by the Steering Committee.

3.5. Decision-Making Process in the Steering Committee

Every member, including RMI Executive Team, has one vote. Proxy votes are possible; however, one person may only assume one proxy vote.

Quorum for decisions exists if more than half (+50%) of the members participate in a meeting. Proxy votes count for the quorum.

Decisions are made by consensus, defined as decisions without objections being maintained. If consensus cannot be reached, opponents shall be asked to propose alternative options that are more likely to reach consensus and these alternatives shall be discussed. If these discussions do not lead to any decision by consensus, majority decision-making procedures should be used.

In case of unavailability to participate in a meeting, any member of the Steering Committee will be invited to share her/his views by writing (email) prior to the meeting. These views will be brought to the discussion on her/his behalf by the RMI team.

4. Complaints against this procedure

Complaints about the application of this procedure can be submitted in writing to RMI at contact@responsible-mica-initiative.com. Complaints shall be considered according to the RMI complaints procedure.

As well, the RMI grievance mechanism is open to anyone willing to share a grievance with RMI. It is accessible on RMI's website: <https://responsible-mica-initiative.com/grievance-mechanism/>

5. Transparency

All the procedures, standards and tools related to the implementation of the standard shall be made publicly available to all. RMI ensures that the latest versions of all standard-related documents are regularly updated on its website.