

## **ICMM Response to the 2008 No Dirty Gold Report *Golden Rules: Making the case for responsible mining***

27 February, 2008

Dear Sirs/Madams,

This letter is in response to the recent release of the No Dirty Gold publication *Golden Rules: Making the case for responsible mining*.

The document provides some limited recognition that the ICMM members discussed in the report are striving to improve their performance. However, much of the information presented has been previously used in No Dirty Gold campaign documents and is, at best, outdated and, at worst, incorrect. In the case of the ICMM member case studies, many of the issues raised have already been addressed by the companies concerned.

Further, the document fails to recognize the contribution and progress towards a sustainability model and responsible mining through implementation of the ICMM's Sustainability Framework and important programs such as the Initiative for Responsible Mining Assurance (IRMA). With respect to IRMA, it is important to recognize that over the last two years both Earthworks and Oxfam America have been engaged in an extensive collaboration and engagement with the mining sector, leading jewellery retailers and others to develop a framework for third party assurance for mining.

With that said, it is difficult to understand how continuation of the No Dirty Gold campaign in what appears to be a "business as usual" manner is complementary to the objective of bringing about change in the mining sector. The motives of both Earthworks and Oxfam America are unclear in releasing this publication at this particular time given that IRMA is clearly making progress in developing standards and assurance processes. It is our view that this publication is counter to and undermines the objectives of IRMA.

We want to emphasize that the ICMM has not predicated its engagement in IRMA based upon the NGOs' ceasing their criticism of our sector. However, in the spirit of ongoing engagement, we believe that said criticism should be based upon facts and current reality and not stale, dated and incorrect information. Prior engagement with the companies related to the No Dirty Gold document would have provided an opportunity for the critique to be based upon facts and current information.

We had believed that engagement with your organizations within the IRMA process had created an opportunity for improved relationships and the creation of a foundation with the potential to lead to stronger, more transparent dialogue in the future. Prior engagement by your organizations with the companies regarding the recent No Dirty Gold release would have reinforced this view and the concepts that we had believed formed the basis for IRMA collaboration, i.e. open, transparent and honest engagement and communication.

The continued and unchanged activism represented by the recent No Dirty Gold publication, emphasized by the lack of any prior engagement with the mining companies, is disturbing, and puts into question the commitment and credibility of Oxfam America and Earthworks in supporting the IRMA process.

We would welcome your response to these questions and comments.

Yours sincerely,

Paul Mitchell  
President, ICMM