ASM TOOLKIT

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Contents

For an overview of how to best utilise the ASM Toolkit, please read our short guide available via the LBMA website.

Regulatory environment (A)		
The purpose of this section is to get an overview of the mining landscape, both in the country and around the mine site. This will support the overall evaluation of the risk with the specific ASM mine. Discussions with the aggregator, the miner, and any other relevant stakeholder can help to fill in this section.		
1.1	What are the requirements to mine legally in this country (mining license, etc.)? Describe the full formalization process (the different steps to obtain). Is the operation subject to regulatory oversight? If so, by what authority/agency? Is their recognition of legitimate, but not legally registered, miners by authorities?	Minimum requirement
1.2	What are the regulatory requirements for intermediate refiners and aggregators in this country? Is the IR/aggregator licensed to process and/or export gold bearing material?	Minimum requirement
1.3	Do they need to obtain an environmental license to operate the mine? If yes, on what date was an application submitted to relevant authorities? Has an environmental license been awarded to mine owners?	Progressive Improvement/Best Practice
1.4	If operation assessed used mercury, what is the regulatory environment regarding mercury? Has the country signed the Minamata convention? What is the country's strategy to phase out mercury? Does the ASM supplier (cooperative or IR) have a mercury reduction plan in development or in place?	Progressive improvement
On site visit to Intermediate Refinery/Aggregator (B)		
Information about the IR/Aggregator		
2.1	Name of the Mine Site(s) supplying to the IR/Aggregator • City • Province • Country • GPS coordinates	Minimum requirement
2.2	Identity of the counterparty • Name • Address • Country of registration • Kind of enterprise: e.g. Intermediate Refiner, Aggregator, cooperative	Minimum requirement
2.3	Evidence of legal registration using reliable independent documents, data or information such as: • Certificates of incorporation • License to refine/export precious metals • Articles of associations • Confirmation with regulatory body database	Minimum requirement
2.4	Identify the beneficial owner(s). • Screen through reliable database such as World Check or domestic police check • Capture ID of UBOs	Minimum requirement

2.5	How long have the entity and the UBO(s) been in business?	Minimum requirement
2.6	What is the annual production received and fine gold produced?	Minimum requirement
2.7	From how many sources does the entity receive material? Are all suppliers within the country the entity is located in? If not, please specify which countries they receive material from?	Minimum requirement
2.8	Does it have a supply chain policy in place? Does this policy explicitly reference OECD Annex II risks? What due diligence process does it rely on when sourcing from ASM suppliers?	Progressive Improvement/Best Practice
2.9	Is the IR or aggregator recognized or accredited by an OECD aligned assurance scheme (i.e. RMI or RJC). If not, are they in the process of making an application for accreditation?	Progressive improvement
On site visit of mining location (C)	
General information about the mining site	
3.1	Name of the Mine Site(s) • Territory • Province • Country • What are the GPS coordinates?	Minimum requirement
3.2	Are the mining site(s) located close to a World Heritage Site?	Minimum requirement
3.3	Is the mining site located in or nearby a Protected environmental or cultural area?	Minimum requirement
3.4	Is there a geological survey made for the operation?	Best practice
3.5	How close is the mine site situated to a populated community?	Minimum requirement
3.6	How close are mine sites to rivers or water bodies? Are you legally required to have a set back or Riparian buffer zone? Do you discharge into the river?	
3.7	Is the mine approved by a relevant ASM Sector standard or are they working with an NGO programme ((e.g. RAGS, CRAFT, Just Gold, SBGI). If yes please attach copy of supporting documentation (last audit report, proof of participation in scheme etc).	Best Practice
3.8	For the mining site assessed, what is the legal status of the mining title (license mining received, mining licensed filed to the authorities but not yet received back) and describe steps to finalize the process to be fully legalized. Confirm who has the legal title of the land being exploited. Is the land owned by a private entity or customary/hereditary ownership? Do non-legal miners have a legitimate right to mine the area? Does a grievance mechanism exist for managing land disputes?	Progressive Improvement/Best Practice

3.9	Obtain documentation (license, mining license filing, etc) and explain what steps have been taken to be /to become legalized. When the licensed is expected to be received? Why the license has not yet been received	Progressive Improvement
3.10	Describe tenure status: • Title holder • Mining operator (is there other operator in the same mining title) • Permit holder, type, status, time period of permit (exploration, etc.) • License holder, type and status of license Attach if applicable: • Mining Title • Mining operation Permit /license • Mine-level agreement Please provide the name, first name, nationality of the UBO/management of the mining entity/cooperative/association and collect copies of ID, business register extract, license, agreement, etc and do screening	Minimum requirement
3.11	These questions relevant to entity or cooperatives/associations only: (i) Describe the requirements to be part of this cooperative / association (ii) Are there any government, political party, or military affiliation of the leadership of cooperative/association or miners' teams. (iii) Is there any royalty, revenue/mineral/gold sharing with the owner of the land and/or the owner of the permits ? If disclosable, what is the level of these royalties ?	Minimum requirement
3.12	Have authorities with regulatory oversight visited the mining site? If yes when was the last visit? What is the result of the visit by the authorities?	Progressive improvement
3.13	Do the miners receive material from external sources? If yes, list the mines and their location? Is there any segregation of material?	Minimum requirement
3.14	Does the Refiner have a provenance report or equivalent information from the supplier outlining the area from which the material was mined?	Minimum requirement
3.15	Is all the production from the mining site sold to one or several aggregators? Please list which ones.	Minimum requirement
Mining type		
Open Pit, alluvial or Tunnels		
3.16	How much ore do they produce? Percentage of gold in ore (grams/tons)? How much fine gold?	Minimum requirement
3.17	Is the mining site underground, alluvial or open pit? Please describe.	Minimum requirement
3.18	Does the mine site have tunnels? Provide a description (height, width, structure, water on the ground, etc.)	Progressive improvement
3.19	Describe security in the tunnels (alarm, electricity, air circulation, emergency exit, etc.)	Progressive improvement
3.20	How many people will be underground at the same time?	Minimum requirement

3.21	Is use of explosives by ASM permitted in this jurisdiction? If yes, describe the kind of blasting are you using?	Minimum requirement
3.22	What kind of training does the operator provide to its employees?	Progressive improvement
3.23	How do you structure your open pit to mitigate the risk of landslide	Progressive improvement
Health and Safety		
3.24	What are the PPE equipment for underground mine or open pit?	Progressive improvement
3.25	Do they give employee training about health and safety/security, etc. (if relevant)	Progressive improvement
3.26	How the mine ensure that all technical machinery and equipment is safe for use and workers are trained appropriately.	Progressive improvement
3.27	Does the mine have a first-aid care and adequate health and safety services available to all workers?	Best practice
3.28	Do they have a record of serious injuries/deaths over last 12 months? List the types of serious injuries.	Progressive improvement
3.29	What lessons were learned from these injuries/accidents?	Progressive improvement
Chemicals and Mercury		
3.3	What kind of source of energy do they source (power grid or diesel generator)?	Minimum requirement (asked for informational purposes only)
3.31	What method of gold processing is used (list any chemicals used). How are chemicals sourced/stored/used/neutralized?	Progressive improvement
3.32	Is the use of mercury illegal in the country the gold was produced?	Minimum requirement/red flag
3.33	If the use of mercury is legal and present at the mine site, what plans are there for phasing out its use? Does the mine have plans to find safe alternatives to mercury? By when does the mining operation plan to be mercury free?	Progressive improvement
3.34	How do they handle their tailings?	
3.35	How is the mercury used and recycled? Is the mercury used in a contained manner?	Progressive improvement
3.36	Are Staff using mercury trained to understand the risk of this chemical and are they using proper personal protective equipment (mask/gloves) when using it?	Best Practice/Progressive improvement
Security		
3.37	Describe the general mining site security? Is the mine or adjacent territory/province/state a CAHRA? What type of payments (in what amounts) are made to the security force?	Minimum requirement
3.38	Does the mining site have a private security force? If yes please describe. Are the private security forces controlled illegitimate non-State by armed groups?	Minimum requirement
3.39	Are the private security force armed? If yes, which type of arms?	Minimum requirement
3.40	Are the private security force screened and trained against UNVP?	Progressive improvement

3.41	Have any serious security incidents occurred involving private security force the past 24 months? Please describe	Minimum requirement
3.42	Is there any presence of public security force on/next to the mine site? Please describe?	Minimum requirement
3.43	Is there any presence of illegitimate non state armed group on/ next to the mine site? Please describe?	Minimum requirement
3.44	Has there been any serious incident(s) involving public security force or non state armed group in the past 24 months? Please describe	Minimum requirement
3.45	Have you identified any evidence of illegally tax or extort money or minerals at mine site? Please describe	Minimum requirement
Child labour		
4.1	Is there a presence of children under 18 years old doing dangerous mining activity on site? If yes please describe. How does it compare against ILO standards?	Minimum requirement
4.2	Are there any children under 15 years old on site? What are their activities?	Progressive improvement
4.3	Describe the measures taken to ensure that no children are illegally (in accordance with national law) working on the mine site.	Progressive improvement
Social, Environmental and Governance		
5.1	How the impact on the environment is minimized on the mine site and on surrounding communities, including emissions to air, soil and water?	Best practice
5.2	What is their awareness level about waste management?	Progressive improvement
5.3	Estimated number of miners on site; Number of miners registered with relevant local or national agencies or NGO projects.	Minimum requirement
5.4	How many employee on the mine site (split between locally employed or from other provinces/countries)	Minimum requirement
5.5	Describe the activities carried out by women on site. Would pregnant women have different treatment in order to avoid doing hazardous activity?	Progressive improvement
5.6	What are the processes regarding fair working hours, number of shift, holidays, discrimination, harassment, fair remuneration, freedom of association/collective bargaining	Progressive improvement
5.7	Have you identified any form of forced labour or corporal punishment?	Minimum requirement
5.8	Where do they stand regarding good organisational governance (maintaining records, formalization of policies, not tolerate corruption/bribery, address grievance, etc.). Rate governance status between 1(no clue of concept) to 10(formalized)?	Progressive improvement
SYSTEM TO ESTABLISH SUPPLY CHAIN CONTROL, TRANSPARENCY AND INFORMATION COLLECTION (applicable to both ASM miners as well as Intermediate Refiners and Aggregators)		
6.1	Describe the supply chain from the mining site to the aggregator/exporter/LSM (buying house/traders).	Minimum requirement
6.2	Are supply chain actors operating in a conflict-affected or high-risk area (CAHRA) are there other recent activities or issues in the region of supply chain which could quickly escalate the risk of conflict or human rights abuses?	Minimum requirement

6.3	Please describe system used to establish transparency, information collection, and control of the supply chain from the mine to the aggregator/exporter/ASM to be able to identify origin of material, i.e., • Traceability (e.g., bag and tag or electronic system to physically trace minerals) • Chain of custody (a range of documents that identify the provenance of minerals and their transport routes).	Minimum requirement
6.4	How is the supply chain managed to ensure that others non identified/assessed materials do not enter the supply chain (is the container sealed, tagged, etc.). Describe other sources of material which could be mixed at the mine, trader, in transport, or at the exporter. What is the probability that gold (value/volume/percent of total) could potentially infiltrate the system?	Minimum requirement
**Transport (Intermediate Refiners and Aggregators)**
7.1	How is the gold transported from the mine site to the exporter/aggregator/LSM?	Minimum requirement
7.2	Who is responsible for the transport?	
7.3	What are the transport routes of the material? Does it pass through a CAHRA?	
7.4	Is there presence of armed groups on the route from the mine site to the aggregator/exporter/LSM? If yes, is further risk assessment or are mitigation measures needed?	Minimum requirement
**GOVERNMENT AND TAXES (Intermediate Refiners and Aggregators)**
8.1	Describe the system of tax, royalties and rights paid to government institutions and government officials for extraction, trade and export of gold.	Minimum requirement
8.2	What taxes, royalties and fees related to mineral extraction, trade and export were paid to government institutions and officials?	Minimum requirement