

CRAFT 2.0 SECOND ROUND OF PUBLIC CONSULTATION MARCH -MAY 2020

#	Consultation activity	Organization /Company	Anonymous	Stakeholder group	Country	Volume	Theme	Module	Original text	Comment	Proposed change	Proposed response of the CRAFT team	Response level
1	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	CRAFT report	M.1/5.2.3/R.1	Criteria: The AMP provides (in the CRAFT Report) all necessary information about its organizational structure, its members, the location of its operations and about the products mined: updated and amended list of the internal entities containing the name, gender, age, work site, and ID number of all miners, and with the respective production capacities of the entities.	It may be helpful that the CRAFT Report format incorporate / align with CADD reporting templates		Not change proposed. Evaluate again the CADD reporting table for alignments	editorial (team)
2	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Internal control system	M.1/5.2.3/R.1	Criteria: The AMP provides (in the CRAFT Report) all necessary information about its organizational structure, its members, the location of its operations and about the products mined: updated and amended list of the internal entities containing the name, gender, age, work site, and ID number of all miners , and with the respective production capacities of the entities.	It is unclear to me what represents OECD compliance and risk mitigation beyond OECD. I would be uncomfortable with calling an operation where some workers operate without registration non-compliant		Check OECD DDG if they ask ID	editorial (team)
3	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	CRAFT report	M.1/5.2.3/R.2	Criteria: The AMP declares (in the CRAFT Report or a separate statement) its commitment to CRAFT.	Could be relevant to add “or in a supply chain policy”	add or in a supply chain policy	Include the word	editorial (team)
4	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	CRAFT report	M.1/5.2.3/R.2	Criteria: The AMP declares (in the CRAFT Report or a separate statement) its commitment to CRAFT.	CADD includes a format for operators’ declarations and other information provision	Non	Explore alignment with CADD form. Not change proposed. It is an opportunity of alignment with other tools.	

5	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	CRAFT scheme	M.1/5.2.3/R.3	The AMP engaged with a CRAFT Scheme.	Are we then forcing a third-party scheme onto ASM?		Change the wording because it looks all AMP must be in a scheme	editorial (team)
6	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Internal control system	M.1/5.2.11/R.1	The AMP must nominate a Responsible Person for the implementation of CRAFT.	Also need a record keeping system – this should be under the responsibility of the person responsible of the implementation of CRAFT	Assign the role of record keeping	Assign the role of record keeping	editorial (team)
7	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Internal control system	M.1/5.2.11/R.1	The AMP must nominate a Responsible Person for the implementation of CRAFT.	Again reporting against that criteria is structured in CADD		Evaluate again the CADD reporting form Not change proposed. It is an opportunity of alignment with other tools.	editorial (team)
8	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Legitimacy		Fulfilled Requirement The AMP is legitimate and formal/legal and can be admitted into a CRAFT Scheme.	As mentioned previously “If the AMP seeks support for implementing the CRAFT Code by joining a CRAFT Scheme” so it is not an obligation to join a CRAFT scheme to implement the CRAFT” – an AMP could adopt the CRAFT and follow its implementation without being part of a CRAFT Scheme => need to adjust the sentence (ex: “can be admitted into a CRAFT scheme or can be admitted as a “CRAFT participant” ?	an AMP could adopt the CRAFT and follow its implementation without being part of a CRAFT Scheme => need to adjust the sentence (ex: “can be admitted into a CRAFT scheme or can be admitted as a “CRAFT participant” ?	Adjust the wording	editorial (team)
9	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Legitimacy	M.2/5.2.1/R.1	Fulfilled Requirement The AMP is legitimate and formal/legal and can be admitted into a CRAFT Scheme.	Is CADD a CRAFT Scheme?	Non	Try to be more specific in Module 3 about CRAFT schemes definition	editorial (team)
10	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Legitimacy		2.1Country Context Case 1: Fail Criteria oThe AMP cannot provide any evidence of efforts towards the legalization of its operation, e.g. the AMP doesn't have any documents proving its application or initiation of the formalization procedure. oThe AMP's operation is not based on good faith: Its operation continues despite actions taken by the competent authorities against the AMP.	I agree with the wording of these criteria and they will be reflected in the CADD Process	Non	Happy to hear that it will be reflected on CADD. Not change proposed.	

	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 4	Legitimacy		2.2Country Context Case 2: A legal framework for ASM exists, but it is neither actively implemented nor enforced.	I think that we need to specify exactly what does mean "actively implemented nor enforced" => In a current context where many producing countries are adopting new mining code that provides more details on the management of the ASM sector => CRAFT implementers may have confusion between the identification of Country Context Case 1 and 2.	CRAFT implementers may have confusion between the identification of Country Context Case 1 and 2.	Revise Context case 1 and 2	editorial (team)
11	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 4	Legitimacy	M.2/5.2.1/R.1	2.2Country Context Case 2: Fail CriteriaoThe AMP cannot provide any evidence of efforts towards the legalization of its operation. oThe AMP continues to operate despite clearly expressed and sustained opposition of traditional authorities, or of public or private stakeholders in the community.	What form of evidence are we considering if the legal framework is not implemented?	Clarify the evidence	Revise the fail criteria and the evidence	editorial (team)
12	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 4	Legitimacy	M.2/5.2.1/R.1	2.3Country Context Case 3: A specific legal framework for ASM does not exist	I get a feeling that it may be clearer to merge all contexts into a single table –as there are some duplications here	Explore to draw a table for clarification with all legitimacy options	To consider to do it in the Volume 4	editorial (team)
13	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 4	Legitimacy	M.2/5.2.1/R.1	Preface MODULE 3 addresses Annell risks for which the OECD DDG recommends that BUYERS immediately suspend or discontinue engagement with AMPs, if a reasonable risk is identified. Consequently, if such risks are present, a BUYER sourcing in conformance with the DDG would not engage. Accordingly, all requirements of this MODULE are pass/fail requirements.		add until the mitigation measure implemented can demonstrated that the risk is not present anymore. Need to distinguish present risk from unmanaged risk. Risk alone should not systematically lead to disengagement	Change wording	editorial (team)
14	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Module 3	MODULE 3				All CRAFT criteria must be assesed by the AMP, this is first-party and check by second or third parties. Not change proposed.	
15	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.1/R.1	Pass Criterion 1 A qualitative (but ideally a semi-quantitative) baseline assessment of child labour has been conducted of the AMP production process and internal supply chain. The outcome of this exercise is documented in the CRAFT Report.	By who? First-party? Hoping CADD reporting meets Pass Criterion 1			

16	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 4	Human and Workers' Rights	M.3/1.1.1/R.1	Pass Criterion 2 The AMP can credibly affirm that in its internal supply chain no persons under the age of 18 (children) perform any of the following work classified as the worst forms of child labour: underground or underwater work, work with dangerous machinery and tools, carrying heavy loads, and work that exposes them to hazardous substances.	What's that?	Clarify what is credibly	Check the word. Explore clarification.	editorial (team)
17	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.1/R.1	Fail Criterion 2 Persons under the age of 18 (children) perform any of the following work classified as a worst forms of child labour in the internal supply chain of the AMP: work underground or underwater, work with dangerous machinery and tools, carrying heavy loads, and work that exposes them to hazardous substances.	On the OECD document, "Practical Actions for Companies to Identify and Address the Worst Forms of Child Labour in Mineral Supply Chains" (OECD 2017) - Table 1 p.12: "Selected common mining and quarrying tasks, hazards and potential consequences" they also outline other worst forms of child labour e.g Cooking and cleaning for adults or Selling goods and services to miners – I saw the comment on the footnote but I don't see why we can not considered that Cooking and cleaning for adults in a mining context has a similar risk given the high risk for sexual abuses	Add Cooking and cleaning for adults or Selling goods and services to miners and see the other forms of worst form of child labor	Add this risk and re-evaluate the others listed and the connection with the AMP risks	editorial (team)
18	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.2/R.1	It is reasonable to believe that the AMP is not linked to any forms of forced or compulsory labour.	Why adopt a different approach (v. previous risk) – documented process to uncover information?	Change the approach and make a documented process	Revise both criteria: child labor and forced labor	editorial (team)
19	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.2/R.1	Pass Criterion 1 The AMP can credibly affirm that any work or service of any person in its internal supply chain is performed under voluntary terms.	What's that?	Clarify what is credibly	Volume 4 explains in more detail what does it mean credibly. Check if all M3 requirements has this clarification. Not change proposed.	editorial (team)

20	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.2/R.1	Pass Criterion 2 The AMP can credibly affirm that all persons related to its internal supply chain are free to resign from their work or service at any moment, according to generally accepted procedures for due notice, respecting existing obligations, and without the menace of penalty.	What's that?	Clarify what is credibly	Volume 4 explains in more detail what does it mean credibly. Check if all M3 requirements has this clarification. Not change proposed.	editorial (team)
21	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.5/R1	Pass Criterion Credible testimonies regarding cases of torture or cruel, inhuman, and degrading treatment at the mine site and its surroundings were sought, and if found to exist, the AMP ensured that proven or suspected perpetrators were excluded from its supply chain.	Why in this case you need credible testimonies while for the previous items "M.3/1.1.2/R.1 and M.3/1.1.1/R.1 " the AMP can just credibly affirm ? Agreed. Is there a reason for approaching each of these risk components differently? That is really my only problem with this document	Maintain the same approaching of the risk management or cover all possibilities in each criteria	Revise the approach of risk management between AMP credibly affirming and external credible testimonies. Not change proposed.	editorial (team)
22	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.3/1.1.6/R.1	Pass Criterion Credible third-party testimonies indicate the absence of gross human rights violations and abuses such as widespread sexual violence.	Same comment than the previous one (and here we ask credible third party testimonies) – I think that we need more consistency for all the items under Human and Workers' Rights	Maintain the same approaching of the risk management or cover all possibilities in each criteria	Revise the approach of risk management between AMP credibly affirming and external credible testimonies and third party testimonies. Not change proposed.	editorial (team)
23	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.3/2.1.7/R.1	Pass Criterion 2 The AMP can make reference to official sources or at least two institutions or persons that were consulted to obtain clarity on whether the area where the AMP operates is a CAHRA or not.	Persons ?	or need to mentioned reliable persons or key stakeholders ?	Check wording	editorial (team)
24	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.3/2.1.8/R.2	Pass Criterion Evidence is provided that the AMP's mine site and internal supply chain is not illegally controlled by any non-state armed group.	Perhaps add to better clarify "Evidence from an internal or external assessment" In general I think that we need more consistency if it is requested an internal / external assessment or self-declaration	add to better clarify "Evidence from an internal or external assessment"	Revise the external and internal assessment wording. Important to clarify that CRAFT report is based on first declaration. In this case, it is internal. To see with more details.	editorial (team)

	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.1.8/R.3	Progress Criteria (pass: "mitigation progress satisfactory") The AMP seeks advice and support to put a risk management plan in place. --- or --- A risk management plan is in place for this risk and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	How do we characterise that?		The guidance are in Volume 4. Add the from.. Revise wording. Not change proposed.	
33	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	All	Module 4	Progress Criteria (pass: "mitigation progress satisfactory") The AMP seeks external advice and support to put a risk management plan in place. --- or --- A risk management plan is in place and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	By the AMP		Revise wording. Not change proposed.	
34	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.1.8/R.4	Fail Criterion Payments are made , but neither receipts nor internal records are kept.	We could have another fail	Criterion: payments are made but not as required by law	See change with Standard Committee	editorial (team)
35	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.1.8/R.5	Fail Criterion None	I don't' understand why none?	It should not be "no efforts or viable steps are taken to minimize"	Add the text	Editorial (team)
36	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.2.1/R.1	Pass Criterion ("mitigated")The AMP and its members pay taxes, fees, and royalties as required by law .		Suggestion: the AMP and its members CAN prove that they are paying taxes, fees and royalties as required by law (in practice we will need some record of those payments)	See possible edition	Editorial (team)
37	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.2.1/R.1	Progress Criteria (pass: "mitigation progress satisfactory") At least some members of the AMP pay taxes (and fees and royalties as applicable).		At least some need to be more clear : half ?	Add clarity to be more specific	Editorial (team)
38	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.2.1/R.1					

	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.2.1/R.2	The AMP discloses, or declares to be committed to disclose, payments to the national EITI.		Not or but and	See change in the words	Editorial (team)
39	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Societal Welfare	M.4/2.2.1/R.2	Pass Criterion ("mitigated")The AMP discloses, or declares to be committed to disclose, payments to the national EITI.		Add In its supply chain policy or internal policy	Revise if we add the proposal or to say in the CRAFT report.	Editorial (team)
40	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Compan y Governance	M.4/5.1.3/R.2	Pass Criterion ("mitigated")The AMP has an Internal Control System (ICS) in place that ensures traceability and that minerals or metals commercialized by the AMP and/or its entities originate exclusively from the mine site of the AMP.	I suggest to avoid mentioning traceability into the CRAFT but rather talking about chain of custody –	in that sentence I suggest to delete "ensures traceability"	Understand the differences to decide on or not about a change	editorial (team)
41	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Compan y Governance	M.4/5.1.5/R.1	The production volumes of the AMP are plausibly aligned with the effective production capacity of the AMP.	The AMP should also avoid as possible cash payment (really a progressive measure)	Include avoid cash payment to reduce the money laundering risk	it may be too strict and it goes beyond the entry level of CRAFT. To be discussed.	editorial (team)
42	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	Module 5				Rejected (comment contradicting overall design or intent of CRAFT): Module 5 are only for high risks. Those kind of elements are for further modules of medium and low risks and other responsible standards.	Editorial (team)
43	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2A	Human and Workers' Rights	M.5/1.1.3/R.1	ControlledA workplace culture has been established that considers sexual violence and harassment as unacceptable.		Add "and a mechanism is in place to take immediate action as soon as cases of sexual violence are detected"	See possible clarification and edition	technica l (SC+team)
44	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2B	Gold: Specific requirements	M.1/5.2.3/SR.1	Criteria: The AMP declares (in the CRAFT Report or a separate statement) its commitment to "reduce, and where feasible eliminate, the use of mercury", as required by the Minamata Convention.		Could be relevant to add "or in a supply chain policy" and In general add that every time that the AMP declares something (see Vol. 2A	See possible clarification	editorial (team)
45	Written comments/Document	BetterChain	No	Due Diligence Innovation hub	Belgium	Volume 2B	Gold: Specific requirements	M.1/5.2.3/SR.1					

	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 2A	Legitimacy	Module 2		Add a section on: 1. Define Indigenous Peoples: Recognize that depending on the country “Indigenous Peoples” can be known by other terms such as “Afrocolombiano, minority nationalities, ethnic minorities...etc.” And then clarify that for the purpose of the CRAFT document “Indigenous Peoples” will encompass all of these (see how IFC_2012 defines it). 2. Describe how AMPs will be held accountable for declaring their commitment to the UN Agreement on Respecting Rights of Indigenous Peoples. 3. Any documentation of consent should show that a range of representatives from communities were consulted and gave consent, not just the leadership.	Study the proposal to add clarity	technical (SC+team)	
48	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 2A	Human and Workers' Rights	M.5/1.1.3/R.1	“The AMP takes steps to protect women against sexual violence and harassment at the workplace.”	Acknowledge gender identity (anywhere “women” are mentioned)	Refine language to say: “To protect any person who identifies as a woman against sexual violence and harassment at the workplace”	See the wording proposal	editorial (team)
49	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 2A	Human and Workers' Rights	M.5/1.1.3/R.1	“The AMP takes steps to protect women against sexual violence and harassment at the workplace.”	Acknowledge gender identity (anywhere “women” are mentioned)	Refine language to say: “To protect any person who identifies as a woman against sexual violence and harassment at the workplace”	See the wording proposal	editorial (team)

50	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 2A	Human and Workers' Rights	M.5/1.1.4/R. 1	The AMP does not base its decisions on criteria classified as discriminatory in the universal declaration of Human Rights	Indigenous Peoples is mentioned as a footnote which could be viewed as minimizing the significance of the group.	NAME the groups in the Module AND create another Module specific to engagement with Indigenous Groups. (Maybe use the same layout as Module 2 with case-by-case options. Perhaps Module 5 could have specific country/region cases in an Appendix.)	Study the proposal to discuss with SC and AG strategic (AG+SC+team)
51	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 4	Human and Workers' Rights	Module 5	CRAFT does not provide guidance on how the AMP might engage with Indigenous Peoples whether the AMP are IPs themselves or if they are working in close proximity.	1. Create Module that requires AMPs to identify if Indigenous Groups are present or not, and geographical distance. 2. Include guidance on how to engage and who to engage with within the Indigenous Communities. (in Appendix). AMPs should be asked to report on: (1) Roles Indigenous Peoples play within the community and/or within the AMP community, (2) If/how the IP community will be affected (directly, indirectly, positively or negatively).	Study the proposal to discuss with SC and AG strategic (AG+SC+team)	

	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 2A	Human and Workers' Rights	Module 5			Can ARM initiate a working group to elaborate on how consultation and FPIC concepts can be operationalized? This working group should include stakeholders and topical experts to focus on how SSM/ASM should approach IP communities and FPIC consultation in a manner appropriate to smaller scale operations.	Study the proposal to discuss with SC and AG technica l (SC+team)	
54	Written comments/Document	planetGOLD Global Component	No	Development program and Agency	The United States	Volume 2A	CRAFT report	Module 1			CRAFT Report and language gaps. No templates available	It would be very helpful and encourage more uptake if you were to include reporting template examples and site assessment matrices as its own volume. Please provide CRAFT in French and if possible, Bahasa.	Publish the CRAFT report templates and tools as part of CRAFT 2.0. Not change proposed.
55	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Internal control system	M.1/5.2.3/R. 1	Criteria: The AMP provides (in the CRAFT Report) all necessary information about its organizational structure, its members, the location of its operations and about the products mined: updated and amended list of the internal entities containing the name, gender, age, work site, and ID number of all miners, and with the respective production capacities of the entities.	What about owners when more structured AMP which comprise entities. Might be important information, especially in relation to corruption, etc.?	Consider owners and other roles more than members	Include the division between owners, members and workers	Editorial (team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Internal control system	M.1/5.2.3/R. 1	Criteria: The AMP provides (in the CRAFT Report) all necessary information about its organizational structure, its members, the location of its operations and about the products mined: updated and amended list of the internal entities containing the name, gender, age, work site, and ID number of all miners, and with the respective production capacities of the entities.		And other actors involved? transporter for instance? Local traders?	Revise scope in the wording	editorial (team)
57	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Internal control system	M.1/5.2.3/R. 1	Criteria: The AMP provides (in the CRAFT Report) all necessary information about its organizational structure, its members, the location of its operations and about the products mined: updated and amended list of the internal entities containing the name, gender, age, work site, and ID number of all miners, and with the respective production capacities of the entities.		And transport itineraries as some risks arise during transport specifically?	See the wording to include transport	Editorial (team)
58	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Legitimacy	M.2/5.2.1/R. 1	2.1Country Context Case 1: Progress towards Fulfillment of the Requirement oThe AMP can prove with legally valid documents that it is making progress towards the legalization of its operation. oThe AMP's operation is based on good faith: No evidence exists that the competent authorities have taken action against the AMP since the AMP entered the formalization process.	Are those two criteria cumulative, ie both of them need to be fulfilled?		Check wording. It is one of both.	Editorial (team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Legitimacy	M.2/5.2.1/R. 1	2.3Country Context Case 3: A specific legal framework for ASM does not exist. Fullfilled requirement: The AMP's operation is legal. The AMP holds the legally valid public or private documents that authorize its operation	In the absence of legal Framework for ASM, how can the AMP be legal?		Define possible clarification	editorial (team)
60	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Legitimacy	M.2/5.2.1/R. 1	Progress towards Fulfillment of the Requirement: oThe AMP declares its willingness to legalize its operation.	Same question if no ASM framework?		Define possible clarification	editorial (team)
61	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	Module 3		Some of the pass/fail criterion are in relation to risks and some others are in relation to process.	One interesting aspect that should be a process established to gather all types of risks is 'the anonymous point of reception'. Perhaps this should be included for all pass criterion or be within the module 2 on process?	Check the criteria that are risks, processes. The anonymous point of reception in pass criteria maybe it is too strict	technical (SC+team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	M.3/1.1.5/R1	Pass Criterion Credible testimonies regarding cases of torture or cruel, inhuman, and degrading treatment at the mine site and its surroundings were sought, and if found to exist, the AMP ensured that proven or suspected perpetrators were excluded from its supply chain.	What if the perpetrator is not within the supply chain? ie. A member of the police or army perpetrating torture? In that case the mitigation measure would not be appropriate as you would not be able to 'exclude' this person from the supply chain?	Perhaps it should be noted that investigations were/are being conducted to hold perpetrators accountable? OR at least mention that the perpetrators would not be linked to the supply chain as excluded would mean that they are within the supply chain... I do realise that it is difficult for AMP to have an influence on the justice system, but buyers might be extremely sensitive about this point.	Revise the origin of this criterion regarding the perpetrators, when they are not in the supply chain but they are violating the HR of the AMP	technical (SC+team)
63	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	M.3/1.1.5/R2	Fail Criterion 1 No independent point for reception of anonymous complaints against serious human rights abuses has been established.		The set-up of this should be in the pass criterion as well. This helps to gather credible testimonies on the question of torture or not.	Explore if we include the set-up of the fail criterion in the pass criteria	Editorial (team)
64	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	M.3/1.1.5/R3	Fail Criterion 3 The AMP cannot confirm that suspected perpetrators have been excluded from its supply chain.	Same comment as above		Explore if we include the set-up of the fail criterion in the pass criteria	Editorial (team)
65	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	M.3/1.1.6/R1	Pass Criterion Credible third-party testimonies indicate the absence of gross human rights violations and abuses such as widespread sexual violence.		Again set up of independent point of reception should be mentioned here.	The anonymous point of reception in pass criteria maybe it is too strict. To explore. The Module 5 includes to develop a complaints mechanism.	technical (SC+team)
66	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	M.3/1.1.6/R1	Pass Criterion Credible third-party testimonies indicate the absence of gross human rights violations and abuses such as widespread sexual violence.		Again set up of independent point of reception should be mentioned here.	The anonymous point of reception in pass criteria maybe it is too strict. To explore. The Module 5 includes to develop a complaints mechanism.	technical (SC+team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Company Governance	M.3/5.1.4/R.1	Fail Criterion One or more members of the AMP have been found guilty by a court of being involved in financing or directly or indirectly supporting non-state armed groups, and the AMP has not taken any corrective action to exclude the member of the AMP or to prevent recurrence.	Should there not be another criterion as well on the absence of the policy? On a second point, 'found guilty by a court' might be a little bit difficult.... As in lots of countries, the justice system might be experiencing challenges and thus might be difficult to arrive to this result.	1. Perhaps move to suspected, or under investigation, or serious reasons to believe? 2. To include fail criterion of the Absence of the policy	To evaluate the suggestions in SC	Technical (SC+team)
67	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.1	Progress Criteria (pass: "mitigation progress satisfactory") The AMP seeks external advice and support to put a risk management plan in place. --- or --- A risk management plan is in place and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	There is an important gap in between both criterion. The adoption of the plan is the first step. But If we refer to the OECD DDG, then measures should have impact in a simonths period. So perhaps the measures should be cumulative?		See the recommendation with SC	Technical (SC+team)
68	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.2	It is reasonable to believe that the AMP is supportive or seeks the support of public or private security forces if their presence is required to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.	We should recognise perhaps more explicitly the need for security for AMP, as most of the mines have somehow a security provided (being by the coops, informal arrangements between miners, etc.). Other actors along the supply chain also do have security.		Evaluate the need to make this element more explicit with the intention of the requirement	technical (SC+team)
69	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	Pass Criterion ("mitigated") Relations between the AMP and public or private security forces are not characterized by tensions, and the AMP declares and can prove (if applicable) that it collaborates with public or private security forces as required by law or seeks their support only as needed for the purpose specified in the requirement.	What kind of evidence is needed to prove this?		Add the possible evidence or prove in the pass criterion. Although it may be in the Volume 4.	technical (SC+team)
70	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland								

71	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.3	Pass Criterion ("mitigated") Relations between the AMP and public or private security forces are not characterized by tensions , and the AMP declares and can prove (if applicable) that it collaborates with public or private security forces as required by law or seeks their support only as needed for the purpose specified in the requirement.	Why is the emphasis is placed on tensions here at the beginning? While acknowledging the need for security, the AMP declares and can prove (if applicable) that security provided is justified by their needs, and that security provided responds to minimum human rights requirements as well as national laws. If problem arise with the conduct of security providers, the AMP declares that it has a risk management procedure in order to report and follow up on issues faced.	Perhaps this should be formulated in a more positive manner?	Explore the new wording of the criterion	editorial (team)
72	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.3	Fail Criterion The AMP refuses obedience to public or private security forces (where these are acting within the framework of the law).	This could be re-phrased. With private security, we are talking about a private contract – there is no notion of obedience. In the case of public security, I think that obedience is misleading somehow. Probably wanted to say “where these are acting outside the framework of the law”.	Check wording of obedience between private and public forces	editorial (team)	
73	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.3	It is reasonable to believe that the AMP does not knowingly hire individuals or units of security forces that are known to have been responsible for gross human rights abuses.	See comments in the guidance about differences in how you describe private and public security	Not change proposed. It is not clear the message.	editorial (team)	

Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R. 3	Pass Criterion ("mitigated") The AMP does not hire security services. --- or --- The AMP seeks reasonable certainty to ensure that individuals or units of hired security forces are not linked to gross human rights abuses. through the vetting requirements checklist, contracts, procurement processes.	It is important to draw a difference between public and private security. 'Hire' is more linked to private security. For private security, there is usually a contractual agreement, and thus we can talk about 'hiring' It is slightly different for public security, where there is usually an agreement in between the company/coops, etc. and the state to provide security forces – so we wont be able to really talk about hire here. Perhaps it should be rephrased like that: The AMP does not contract private security services and has not requested the provision of public security linked to their operations. Second point: this criteria demonstrates that they did their job at the beginning. But what if later they realise that one of the security personnel is linked to gross HR violations? Perhaps it should then be added: if information arise that personnel committed to the security of their operations is linked to human rights	The AMP does not contract private security services and has not requested the provision of public security linked to their operations.	Revise the re-wording with the justification	editorial (team)	
74	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R. 3	Pass Criterion ("mitigated") The AMP does not hire security services. --- or --- The AMP seeks reasonable certainty to ensure that individuals or units of hired security forces are not linked to gross human rights abuses. through the vetting requirements checklist, contracts, procurement processes.	A more general question: is it even realistic to assume that the AMP will not hire security services at all? I feel they will need some security set-up in any case. And if they do, then this criterion should be deleted, otherwise it creates a loophole to avoid any serious reporting on the security set-up.		See comment for improvement	editorial (team)
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	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.3	Progress Criteria (pass: "mitigation progress satisfactory")The AMP seeks advice and support to put a risk management plan in place, including by adapting contracting and procurement policies and vetting requirements --- or --- A risk management plan is in place for this risk and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	Perhaps a bit too general 'risk management' about what? Making sure that they don't hire security personnel involved in gross HR violations? Or a risk management that if they find out, they have the means to respond to that?		Evaluate the wording	editorial (team)
76	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.3	Fail Criterion The AMP knowingly and purposefully hires security providers that are known for their abusive practices.	What about if the AMP is careless and chooses not to look into it, and therefore intentionally unknowingly hires such providers? This is also grounds for not being CRAFT certified?		CRAFT is based on the good faith. It is a process standard instead of a certification scheme. See the recommendation.	
77	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.4	Pass Criterion ("mitigated")The AMP is not obligated to pay for services provided by public security forces. --- or --- The AMP makes payments to public security forces as required by law and documented by receipts.	Instead of putting two different ones, why not merge them for clarity?	'When AMP are legally bound to pay for services provided by public security forces, payment are in accordance with the law, and documented by receipts.'	See the recommendation with SC	technical (SC+team)
78	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.4	Progress Criteria (pass: "mitigation progress satisfactory") The AMP makes payments to public security forces as required by law and records the payments made. --- or --- A risk management plan is in place for this risk and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	This is not a pass criterion?		See the recommendation with SC	technical (SC+team)
79	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.4	Progress Criteria (pass: "mitigation progress satisfactory") The AMP makes payments to public security forces as required by law and records the payments made. --- or --- A risk management plan is in place for this risk and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	This is not a pass criterion?		See the recommendation with SC	technical (SC+team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.5	It is reasonable to believe that the AMP supports all efforts or takes all viable steps to minimize adverse impacts associated with the presence of public or private security forces on their mine site(s).	While it is not done in the OECD Guidance per se, I think that it should be recognised that the level of control over public and private security is different. In the case of private security, there is a direct link and possible control of the AMP with the private security that they hire (I guess most time) or recruit to provide security. In that case, more should be done in order to remediate adverse impact of private security. For public security, while the level of control is not as important, association with other actors (local authorities, other entities, should be favored.		Not change proposed. See OECD DDG and how to revise the recommendation to distinguish both.	editorial (team)
80	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.1.8/R.5	Fail Criterion None	What if no efforts are undertaken?		Revise to change the fail criterion	technical (SC+team)
81	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.4/2.2.1/R.2	The AMP is preparing its EITI declaration but has not yet submitted it. --- or --- A risk management plan is in place for this risk, and the AMP demonstrates that it implements and monitors the plan with measurable improvements.	In some countries, the EITI is focused on industrial actors and does not require ASM to report. What would happen then? Maybe this should be rephrased.		Revise the expectation of the role of ASM with EITI	technical (SC+team)
82	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Human and Workers' Rights	M.5/1.1.3/R.1	Controlled A workplace culture has been established that considers sexual violence and harassment as unacceptable.	Perhaps too vague and measures to put in place should be specified?		To consider modify writing	technical (SC+team)
83	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A							

84	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Company Governance	M.5/5.2.8/R.2	Controlled A grievance procedure is in place.	To me the grievance procedure could cover all the risks and would be useful as a process per se.	Include the grievance mechanism in the internal control system	See recommendation technical (SC+team)	technical (SC+team)
85	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.3/2.1.7/R.1	This analysis should address the following 5 key questions: 1.What are the root causes of tensions and potential triggers? 2.If there is a conflict, who are the main actors in the conflict? What are their motives and capacities to inflict violence? 3.Is conflict likely to emerge or re-emerge in this area? 4.Who are the groups in vulnerable positions? Is the AMP part of this vulnerability? 5.Are there effective state mechanisms to hold perpetrators of violations of human rights or IHL available? Are there other mechanisms available?	In a CAHRA, you can also have areas where there are issues of governance, institutional weaknesses, etc. Basically, using the 5 key questions, Rwanda for instance would not qualify as a CAHRA, while there are requirements that they implement the OECD DDG in full due to risks link to governance, fraud, etc. So it would be important to potentially add additional questions that would more fully cover compleenvironments.	Check the questions to define CAHRA	to revise for improvement	editorial (team)
86	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 2A	Societal Welfare	M.3/2.1.8/R.1	It is reasonable to believe that the AMP is not linked to committing war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide. (Applies only if the AMP is located in a CAHRA)	The headings/assessment titles are a bit wordy. We wonder if there is a way to make them more clear and direct?		rejected (comment contradicting overall design or intent of CRAFT): the intention of the CRAFT is under the spirit of due diligence.	editorial (team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R. 1	The AMP should guard against illegal taxation, extortion, and control by security forces. Situations of illegal taxation, extortion, or control by public or private security forces acting on behalf of public forces are particularly difficult for AMPs to manage without external support, as resistance against (even illegally operating) public forces is likely to trigger legal action against the "disobeying" person. It is therefore of vital importance that AMPs seek support on this topic from CRAFT Schemes and BUYERS.		And other stakeholders? Other AMPs, local authorities, etc.	Add the other stakeholders	editorial (team)
89	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R. 2	It is reasonable to believe that the AMP is supportive or seeks the support of public or private security forces if their presence is required to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.	The difference between public and private security is well explained, but this is not necessarily present in the module 4 criterion. For private security, while AMPs do not very often contract private security companies, there is informal security often provided at the sites, within the coops or other arrangement. I think it would be interesting to mention also this case, and how AMPs must ensure that this security does not violate HR, etc.		See the possibility to clearly differentiate public and private forces in the criteria.	technical (SC+team)
90	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R. 2	It is reasonable to believe that the AMP is supportive or seeks the support of public or private security forces if their presence is required to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.	The difference between public and private security is well explained, but this is not necessarily present in the module 4 criterion. For private security, while AMPs do not very often contract private security companies, there is informal security often provided at the sites, within the coops or other arrangement. I think it would be interesting to mention also this case, and how AMPs must ensure that this security does not violate HR, etc.	It would be good to differentiate in the criterion the public and private security aspects.	See the possibility to clearly differentiate public and private forces in the criteria.	technical (SC+team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	It is the duty public of security forces (police, military, and other enforcement agencies) to maintain public order and the rule of law on behalf of the state. As any civil person, AMPs (as groups comprised by civil persons) have the right to seek the support of public forces and the obligation to collaborate with them in the framework of the law. In some instances, upon request, or negotiation and consultations, public security becomes assigned to an AMP site by the national or provincial government.	I think an important criterion to look at here is how transparent this is handled. Is there an MoU? Is it publicly accessible? Are financial flows from the company to the AMP based on the MoU, fully disclosed, and audited?		Add improvements	editorial (team)	
91	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	It is the duty public of security forces (police, military, and other enforcement agencies) to maintain public order and the rule of law on behalf of the state. As any civil person, AMPs (as groups comprised by civil persons) have the right to seek the support of public forces and the obligation to collaborate with them in the framework of the law. In some instances, upon request, or negotiation and consultations, public security becomes assigned to an AMP site by the national or provincial government.	I think it may not always be clear how this phenomenon happens.		Not change proposed. See the phenomenon mentioned.	editorial (team)	
92	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	Private security forces require authorization to operate by the state but are directly contracted by the interested party.			We use usually private security providers and not forces.	Change the word	editorial (team)
93	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	Private security forces require authorization to operate by the state but are directly contracted by the interested party.			We use usually private security providers and not forces.	Change the word	editorial (team)

94	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	Guidance on Pass Criterion: In its CRAFT Report the AMP shall describe the “good relation” with public or private security forces.	Again I am not sure that good relations or lack of tension is the perfect criteria.	This is vague and should be carefully spelled out.	See with the Volume 2A technical (SC+team)
95	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	Guidance on Progress Criterion: In its CRAFT Report the AMP shall describe the “difficult relation” with public or private security forces, as well as all efforts and steps undertaken to improve the relation.	This is vague.	Revise the expression of good relation or tension	See with the Volume 2A technical (SC+team)
96	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.2	When the AMP is keen on searching support of public or private security forces (meaning that it has defined protocols that enable to go to public or private security forces when a relevant event occurs, the relation can be described as “good”. In the same way, if the AMP does not have any relation with any public or private security force, this relation can be described as “good”.	In DRC, there were instances of co-ops fighting against each other and using public security forces in these fights. So ‘good relations’ is not necessarily the best criteria I think.	Revise the expression of good relation or tension	See with the Volume 2A technical (SC+team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.3	It is reasonable to believe that the AMP does not knowingly hire individuals or units of private security forces that are known to have been responsible for human rights abuses or violations of international humanitarian law.	I would add that the term "hiring" is adequate for PSP, but not for public security. For the latter, the company can only enter into an agreement.	This section should be split into 2 distinct sections: one on hiring public security and one on hiring private security. The hiring considerations are very different (related and interlinked, but nevertheless distinct). Private security has no other law enforcement mandate, whereas public security also has broader responsibilities to the public, is presumably effectively trained, and there are accountability mechanisms in the police and military. Our comments below therefore reflect this split and relate to private security.	See with the Volume 2A	technical (SC+team)
97	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.3	AMPs hire security services. By hiring such services, the AMP might have limited control over the staff deployed by the security provider, and even less so in countries where such services to private entities are provided by public security forces.	Again – idea of informal security provided within the AMP. We might want to take that into account?	Differentiation to be made between public and private security.	See with the Volume 2A	technical (SC+team)
98	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.3	AMPs hire security services. By hiring such services, the AMP might have limited control over the staff deployed by the security provider, and even less so in countries where such services to private entities are provided by public security forces.	unclear		Revise wording	editorial (team)

100	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Societal Welfare Volume 4	M.4/2.1.8/R. 3	<p>Paragraph 7 of Annex of the OECD DDG makes reference to the Voluntary Principles on Security and Human Rights (VP 2000). In order to avoid hiring a security provider that disrespects human rights, AMPs may hire security providers on the condition that they render their services in alignment with the VPs..</p>	<p>DCAF is currently working with the OECD on a study on synergies between the OECD DDG and the VPs. We will share the study once finalised.</p> <p>One of the findings of the study is that the VPs have been written for large scale actors, and thus some principles would be difficult to apply per se in the ASM context. This being said, it would be interesting to go a bit deeper here in how the VPs can be understood and implemented in the ASM context, ie defining what it means service rendered under the VPs.</p>	<p>Not change proposed. It will be very interesting to get the study of synergies between OECD DDG and VPs. It is important to understand the connection with the LSM and ASM.</p>	editorial (team)
101	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Societal Welfare Volume 4	M.4/2.1.8/R. 3	<p>In some countries facing a peace process, some CRAFT Scheme might face the case of a potential social and economic reintegration of surrounding soldiers in accordance with the (inter)national laws. If you see any way to address such cases, then Volume 3 of the Code describes how to adapt CRAFT for such purposes. Also we are available to work jointly on solutions for such cases and cover them in future versions if needed. An individual risk management plan needs to be put in place in cases where abidance to the VPs cannot be formally agreed.</p>	<p>This is very interesting and relevant. It would be great if we could provide feedback on this procedure as well.</p>	<p>Not change proposed. DCAF is interested to know more about this procedure.</p>	editorial (team)

	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Societal Welfare	M.4/2.1.8/R.3	Guidance on Fail Criterion: The AMP must establish a risk management plan.		A section should follow this on public security. - The AMP should agree on a Memorandum of understanding with the public security forces to ensure agreement on security risks and level of support needed; - the MoU should not just be focused on the AMP, but also include wider citizen/community security elements addressing the communities around the mining sites; - The AMP should coordinate and dialogue regularly with the public security representatives as well as the appropriate ministry to ensure information sharing; - In some cases, the AMP should undertake a conflict analysis to understand the root causes of tensions and whether the public security force may be	Add improvements but consider to adapt to ASM context for making a step by step process.	technical (SC+team)	
102	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Societal Welfare	M.4/2.1.8/R.3	Guidance on Fail Criterion: The AMP must establish a risk management plan.		A section should follow this on public security. - The AMP should agree on a Memorandum of understanding with the public security forces to ensure agreement on security risks and level of support needed; - the MoU should not just be focused on the AMP, but also include wider citizen/community security elements addressing the communities around the mining sites; - The AMP should coordinate and dialogue regularly with the public security representatives as well as the appropriate ministry to ensure information sharing; - In some cases, the AMP should undertake a conflict analysis to understand the root causes of tensions and whether the public security force may be	Add improvements but consider to adapt to ASM context for making a step by step process.	technical (SC+team)	
103	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Societal Welfare	M.4/2.1.8/R.4	The AMP can make a commitment to transparency of all revenue flows. Develop a financial reporting framework.		There are more good practices available in the section on Working with Public Security Forces in the DCAF-ICRC Toolkit but not all of these are as relevant to ASM (some may be more relevant to collectives of ASM or AMPs as a group).		Add other good practices and see or reference the toolkit http://www.securityhumanrightshub.org/sites/default/files/publications/ASHRC_Toolkit_V3.pdf	editorial (team)

104	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.4	Risk management plans shall consider engaging with central or local authorities, international organizations, and civil society organizations to seek their contribution to workable solutions.	I think that this is generally the case for all risks in relation to security and HR.	To include in all risks.	Maybe to include from the beginning of Module 2A	technical (SC+team)
105	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.5	It is reasonable to believe that the AMP supports all efforts or takes all viable steps to minimize adverse impacts associated with the presence of public or private security forces on their mine site(s).	Does this mean rather on accountability and grievance resolution pathways?	This statement takes a rather negative, risk minimising view of the presence of public or private security forces. While indeed their presence brings challenges, I believe the question should rather be – particularly with regards to public security forces on site or in the surrounding communities – how the AMP can contribute to them actually being positive drivers of change. I would suggest adding a structure engagement with public security forces – e.g. through participating in regular multi-stakeholder meeting or even in local security councils – as a criterion.	See with the Volume 2A	technical (SC+team)
106	Written comments/Document	DCAF:Geneva Centre for Security Sector Governance	No	Experts in security sector governance	Switzerland	Volume 4	Societal Welfare	M.4/2.1.8/R.5	The CRAFT Report shall • identify the different risks that exist for men and women, • include indication of development of grievance resolution process.	I think a lot more can be said here but am not sure if this section would specifically pertain to grievance resolution.		Not change proposed. It is not clear the suggestion.	technical (SC+team)

107	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector The Netherlands	Volume 2A	Human and Workers' Rights	Module 5	Women in ASM communities face competing responsibilities, including child rearing, domestic duties and subsistence farming, and often need to take their children with them to the mine site where they too are then exposed to health and safety issues associated with mining activity. Due to the lack of childcare facilities in many (remote) ASM communities, small children from 0-6 (babies and toddlers) may accompany parents to the mining site. The AMP must therefore ensure that proper child caring facilities are provided to working and breast-feeding mothers as a progressive requirement.	Include another criterion about women's and children's rights.	Rejected (it goes further than the high risks). This may be a criterion for the best practice standards such as Fairmined.	technical (SC+team)
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108	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector The Netherlands	Volume 4	Human and Workers' Rights	M.5/1.1.3 /R.1	Controlled A workplace culture has been established that considers sexual violence and harassment as unacceptable.	We do not agree on the writing on the criterion. The criteria is vague and, what is more, difficult to measure (i.e. 'workplace culture'). The formulation of the criteria does not capture the appropriate guidance on M.5 / 1.1.3 / R.1 outlined in Volume 4 (Guidance Book). This guidance includes the development of a policy on preventing and responding to sexual violence and harassment and related staff training, and setting up a grievance mechanism with qualified representatives incl. women's on committee. Also, Volume 4 states that, in principle, the risk of sexual violence and harassment should never be declared as "controlled", because considering the risk controlled may lead to decreased awareness of the issue.	Therefore, we recommend to do away with the criteria and instead include a Pass and Progress Criteria for M.5 / 1.1.3 / R.1: Guidance on Pass Criteria: In its CRAFT Report the AMP shall summarize it's (specific) policy on preventing and responding to sexual violence and harassment, including an appropriate grievance mechanism. Guidance on Progress Criteria: In its CRAFT Report the AMP shall · describe measures undertaken to prevent and respond to sexual violence and harassment during the past reporting period, and · describe and commit to implementing the measures planned for the next reporting period.	Evaluate the suggested change either in Volume 2A or Volume 4 technical (SC+team)
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109	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector	The Netherlands	Volume 4	Human and Workers' Rights	M.5/1.1.3/R.2	<p>Controlled Access to mineral resources, to mineral producing activities, and to miners' organizations is conditioned to rules and criteria that do not distinguish between men and women.</p>	<p>The formulation of the criteria does not capture the intent of M.5 / 1.1.3 / R.2 as outlined in Volume 4 (Guidance Book), which concerns action to overcome: i. gender-based restrictions of access to mineral resources and benefits; and ii. exclusion of women from decision making about mining resources. Furthermore, Volume 4 offers more concrete guidance to 'take steps to respect women's rights' as it proposes that the AMP conducts a gender survey to investigate existing gender-based restrictions and, presumably, to design appropriate steps accordingly (e.g., an equal opportunity action plan). Also, similar to M.5 / 1.1.3 / R.1, it is questionable if this risk can ever be considered "controlled".</p>	<p>Therefore, we recommend to include Pass and Progress Criteria for M.5 / 1.1.3 / R.2:</p> <ul style="list-style-type: none"> Guidance on Pass Criteria: In its CRAFT Report the AMP shall summarize the results of the proposed gender survey and an equal opportunity action plan to address identified gender-based restrictions. Guidance on Progress Criteria: In its CRAFT Report the AMP shall <ul style="list-style-type: none"> describe measures undertaken to address identified gender-based restrictions and promote equal opportunity describe and commit to implementing the measures planned to address identified gender-based restrictions and promote equal opportunity for the next reporting period 	Evaluate the suggested change either in Volume 2A or Volume 4	technical (SC+team)
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110	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector	The Netherlands	Volume 4	Human and Workers' Rights	M.3/1.1.1 /R.1	<p>It is reasonable to believe that the artisanal and small-scale minerals producers (AMP) do not tolerate worst forms of child labour in their production process.</p> <p>Pass criterion 1A qualitative (but ideally a semi-quantitative) baseline assessment of child labour has been conducted on the AMP production process and internal supply chain. The outcome of this exercise is documented in the CRAFT Report.</p> <p>Pass criterion 2The AMP can credibly affirm that in its internal supply chain, no persons under the age of 18 (children) perform any of the following work classified as the worst forms of child labour: underground or underwater work, work with dangerous machinery and tools, carrying heavy loads, and work that exposes them to hazardous substances.[1]</p>	<p>Include the following in guidance book (CRAFT volume 4):</p> <p>The AMP makes efforts and takes steps to raise awareness that children in worst forms of child labour is unacceptable.</p> <p>In relation to Pass criterion 1: baseline assessment shall also indicate impacts of the child's work on their education (school enrolment or drop-out and the regularity of school attendance as well as performance) and household characteristics.</p> <p>In relation to Pass criterion 2: if children between age 15-18 are detected in the worst forms of child labor, they must be immediately withdrawn. Affected children should be supported in finding safe alternative income generation opportunities.</p> <p>In the guidance book it is</p>	to revise for improvement	
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	Written comments/Document				Volume 4	Human and Workers' Rights	M.3/1.1.5/R1	<p>It is reasonable to believe that the artisanal and small-scale minerals producers (AMP) are not linked to committing any forms of torture or cruel, inhuman, and degrading treatment.</p> <p>Pass criterionCredible testimonies regarding cases of torture or cruel, inhuman, and degrading treatment at the mine site and its surroundings were sought, and if found to exist, the AMP ensured that proven or suspected perpetrators were excluded from its supply chain.</p>		<p>The human rights body contacted to obtain testimonies should (be encouraged to) pay particular attention to marginalised and vulnerable groups, including women and children.</p> <p>In seeking testimonies about the existence of such serious human rights abuses, also children's perspectives should be obtained. Children's perceptions and needs may not be understood or expressed accurately by adults.</p>	to revise for improvement	editorial (team)	
111	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector	The Netherlands	Volume 4	Human and Workers' Rights	M.3/1.1.6/R.1	<p>It is reasonable to believe that the artisanal and small-scale minerals producers (AMP) are not linked to any other gross human rights violations and abuses, such as widespread sexual violence.</p> <p>Pass criterionCredible third-party testimonies indicate the absence of gross human rights violations and abuses such as widespread sexual violence.</p>		<p>The human rights body contacted to obtain testimonies should (be encouraged to) pay particular attention to marginalised and vulnerable groups, including women and children.</p> <p>In seeking testimonies about the existence of such serious human rights abuses, also children's perspectives should be obtained. Children's perceptions and needs may not be understood or expressed accurately by adults.</p>	to revise for improvement	editorial (team)
112	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector	The Netherlands	Volume 4	Human and Workers' Rights	M.3/1.1.6/R.1	<p>It is reasonable to believe that the artisanal and small-scale minerals producers (AMP) are not linked to any other gross human rights violations and abuses, such as widespread sexual violence.</p> <p>Pass criterionCredible third-party testimonies indicate the absence of gross human rights violations and abuses such as widespread sexual violence.</p>		<p>The human rights body contacted to obtain testimonies should (be encouraged to) pay particular attention to marginalised and vulnerable groups, including women and children.</p> <p>In seeking testimonies about the existence of such serious human rights abuses, also children's perspectives should be obtained. Children's perceptions and needs may not be understood or expressed accurately by adults.</p>	to revise for improvement	editorial (team)

113	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector	The Netherlands	Volume 4	Human and Workers' Rights	M.5/1.1.1/R.1	<p>The artisanal and small-scale minerals producers (AMP) take steps towards eradicating all worst forms of child labour directly or indirectly related to mining, among persons under the age of 18.</p> <p>Risk: Persons below 18 years of age, within the community, are engaged in work classified by ILO as “worst forms of child labour”, directly or indirectly related to the mining activity.</p> <p>Controlled Persons below age of 18 work only at workplaces appropriate for their age, not classified as worst forms of child labour. A mechanism is in place to take immediate action as soon as cases of worst forms of child labour are detected.</p>	<p>Include in guidance book: The AMP makes efforts and takes steps to raise awareness that children in worst forms of child labour is unacceptable. If children between age 15-18 are detected in the worst forms of child labor, they must be immediately withdrawn. These children should be helped in finding safe alternative income generation opportunities. The guidance book should also include guidance and minimum requirements of such ‘mechanism’.</p>	to revise for improvement	editorial (team)
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	Written comments/Document												
114	Written comments/Document	Responsible Gold Agreement	No	Coalition of companies and organisations in the gold sector	The Netherlands	Volume 4	Human and Workers' Rights	M.5/1.1.1/R.2	The artisanal and small-scale minerals producers (AMP) takes steps towards eradicating all child labour of persons under the age of 15. Risk: Persons younger than 15 years of age, within the community, are admitted to employment or allowed to work in any occupation. Controlled Persons below age of 15 are not working in any occupation. A mechanism is in place to take immediate action as soon as cases of child labour are detected.		Include in guidance book: The AMP makes efforts and takes steps to raise awareness of the need to eliminate child labour. The AMP should conduct child protection trainings at all levels and in all necessary languages ensuring the information is user-friendly and accessible for miners with lower literacy levels as well. The guidance book should also include guidance and minimum requirements of such 'mechanism'.	to revise for improvement	editorial (team)
115	Written comments/Document	PlanetGOLD Colombia Coordination	No	Development program and Agency	Colombia	Volume 1	Commodities scope		1. Consideramos de suma importancia incluir dentro de los productos, "los concentrados", esto en referencia a que en el territorio nacional encontramos mineros y mineras que pueden no tener fácil acceso a los procesos de beneficio y en algunos casos la intermediación para llevar a cabo el proceso reduce sus ingresos. Adicionalmente el mercado de los concentrados también es una opción y podría en algunos casos ajustarse a lo que hoy en día pueden ofrecer algunas operaciones de pequeña minería en el país.	Incluir concentrados dentro de los productos	to propose in the SC and AG	editorial (team)	

	Written comments/Document	PlanetGOLD Colombia Coordination	No	Development program and Agency	Colombia	Volume 1	Organizational scope			Sugerimos hacer claridad si el CRAFT puede ser utilizado como estándar para comercializadores y si esto es así procurar visibilizar productos diferenciados. No fue claro para el grupo del proyecto cuáles son los módulos que debe diligenciar y/o implementar el comercializador para obtener el estándar CRAFT.		Specify in the module 2A that all criteria apply to production and extended organizational scope	editorial (team)
116	Written comments/Document	PlanetGOLD Colombia Coordination	No	Development program and Agency	Colombia	Volume 2A		Module 5		Entendemos que el Módulo 5, del estándar no limita al minero/a en un potencial proceso de venta de oro, sin embargo, si consideramos que podría ser explícito el plan de mejoramiento y su seguimiento como una evidencia del cumplimiento de estos lineamientos.	Agregar que los elementos del modulo 5 son de cumplimiento	Rejected (comment contradicting overall design or intent of CRAFT): The design of the Module 5 is to be flexible in the priorities of the AMPs, so to make it explicit its compliance will contradict this spirit	technical (SC+team)
117	Written comments/Document	PlanetGOLD Colombia Coordination	No	Development program and Agency	Colombia	Volume 2A		Module 5		Consideramos que la presencia del coronavirus COVID 19, llegó para quedarse y no será un tema de corto plazo. Este tema es de vital importancia para los proyectos implementados por PNUD y les manifestamos que si se hace necesario para incluir este tema algún apoyo en recursos económicos o humanos estaremos dispuestos a suministrarlo.	Sugerimos que dentro de los lineamientos del Modulo 5, se incluyan evidencias del seguimiento de protocolos y de uso de elementos de bioseguridad, con el fin de que se evidencie la producción como Libre de COVID-19	Include a criterion regarding security protocol or measures in Module 5	strategic (AG+SC+team)
118	Written comments/Document	PlanetGOLD Colombia Coordination	No	Development program and Agency	Colombia	Volume 2A		Module 5					

	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia	Volume 3	Module 3		Una de las fortalezas del Código CRAFT se sustenta en que es de libre implementación, esto debe ser explícito y debe sustentarse proporcionando una guía para la implementación por terceros. De la misma forma si es así, consideramos importante hacer la claridad que la implementación del estándar de requerirse el apoyo de la organización ARM, si tendrá un costo, referido al proceso de asistencia técnica y será determinado para cada caso en específico.	Adicionar una guía de implementación de terceros	Volume 4 intention is to be guidance book. Not change required.	
119	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia	Volume 2A			Sugerimos socializar con las autoridades competentes las evidencias que podrían soportar el cumplimiento o no de los lineamientos del estándar, esto con el fin de facilitar la expedición de este tipo de certificaciones o pronunciamientos. En este mismo sentido en el tema de monitoreo de volúmenes podría ser suficiente los informes trimestrales de producción que los mineros/as reportan a la autoridad minera.		Not change required. Suggestion to present more to the national authorities to get their support to get evidence and of each criteria.	
120	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia	Volume 3	Communication		Consideramos que podría ser interesante para mineros/as poder conocer en forma muy ágil con una ventanilla en línea en la misma página web de la nueva versión cuál es su nivel frente al estándar CRAFT y que existiera un chequeo rápido de los requisitos con el fin de que pudieran conocer sus fortalezas y debilidades.		Not change required. Recommendation for ARM team is communication department	
121	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia	Volume 1	Communication		8. Es de suma importancia conocer para la comunidad en general, cuanto pueda durar el proceso para obtener y/o cumplir el estándar CRAFT, sería recomendable ajustar un tiempo promedio con el fin de orientar a los posibles interesados y motivarlos en el proceso de implementación.		To include the clarity in the comms material or in the introduction.	editorial (team)
122	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia							

126	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia				. Consideramos que podría ser ambicioso para esta versión, pero podríamos sugerir revisar un piloto craft para oro femenino, esto con el fin de avanzar en la política de igualdad de género exigida a nivel mundial.		Not change required. For further development.	
127	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia				Consideramos que para procurar la sostenibilidad, visibilidad y masificación del estándar podría sugerirse que alguna de las agencias de fomento o promoción de la pequeña minería o las cámaras de comercio o cámara sectorial de la ANDI o quien haga sus veces, pudiera abrigar el estándar como una opción viable para la pequeña minería responsable y acompañe los procesos de difusión y comunicación respectivos.		Not change required. Good recommendation to promote the application in Colombia.	
128	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Volume 2B	Module 5			14. Somos conscientes que el Código CRAFT es utilizado como referencia en todo el mundo, sin embargo, sugerimos que para el caso de Colombia se haga explícito "El PMAPE declara que no se usa mercurio", como lo exige el Convenio Minamata y el Gobierno de Colombia"	Rejected because CRAFT is global. This could be in the CRAFT check list for Colombia.	Rejected because CRAFT is global. This could be in the CRAFT check list for Colombia.	
129	Written comments/Document	PlanetGOL D Colombia Coordination	No	Development program and Agency	Colombia				Sugerimos para ARM una posible alianza con algunas entidades como SGS, Icontec, Bureau Veritas, para establecer un curso de entrenamiento para implementadores CRAFT para su debida masificación y procurar la coherencia en el evento de su implementación por parte de terceros. En este sentido ofrecemos nuestro apoyo como proyecto para que esta posible estrategia pueda ser llevada a cabo.		Not change required. Recommendation received to promote the application in Colombia. ARM can talk directly to explore the added value of these entities in the training.	

	Written comments/Document	PlanetGOLD Colombia Coordination	No	Development program and Agency	Colombia	Volume 3	Logo			Finalmente y no menos importante sugerimos que el logo podría construirse con las mineras y los mineros para que tuvieran su participación y se generaría sentido de pertenencia en torno al código CRAFT, sin embargo, si esto ya no es posible	Si consideramos mantener en el nombre del estándar la imagen del martillo pues al ver el nuevo logo la primera idea que llegó a nuestra mente no fue asociado con minería.	See with Comms team of ARM and SC		
130														
131	Written comments/Document	Women Rights and Mining (WRM)	No	Women rights group	The Netherlands	Volume 2A	Human and Workers' Rights	M.5/1.1.3/R.1	Controlled	A workplace culture has been established that considers sexual violence and harassment as unacceptable.	The criteria is vague and, what is more, difficult to measure (i.e. 'work-place culture'). The formulation of the criteria does not capture the appropriate guidance on M.5 / 1.1.3 / R.1 outlined in Volume 4 (Guidance Book). This guidance includes the development of a policy on preventing and responding to sexual violence and harassment and related staff training, and setting up a grievance mechanism with qualified representatives incl. women's on committee. Also, Volume 4 states that, in principle, the risk of sexual violence and harassment should never be declared as "controlled", because considering the risk controlled may lead to decreased awareness of the issue.	Therefore, we recommend to do away with the criteria and instead include a Pass and Progress Criteria for M.5 / 1.1.3 / R.1: Guidance on Pass Criteria: In its CRAFT Report the AMP shall summarize its (specific) policy on preventing and responding to sexual violence and harassment, including an appropriate grievance mechanism. Guidance on Progress Criteria: In its CRAFT Report the AMP shall <ul style="list-style-type: none">• describe measures undertaken to prevent and respond to sexual violence and harassment during the past reporting period, and• describe and commit to implementing the measures planned for the next reporting period.	Revise the suggestion to change the pass and fail criteria	technical (SC+team)

Written comments/Document	Women Rights and Mining (WRM)	No	Women rights group	The Netherlands	Volume 4	Human and Workers' Rights	M.5/1.1.3/R.2	Controlled Access to mineral resources, to mineral producing activities, and to miners' organizations is conditioned to rules and criteria that do not distinguish between men and women.		Therefore, we recommend to include Pass and Progress Criteria for M.5 / 1.1.3 / R.2:	Revise the suggestion to change the pass and fail criteria	technical (SC+team)
132										Guidance on Pass Criteria: In its CRAFT Report the AMP shall summarize the results of the proposed gender survey and an equal opportunity action plan to address identified gender-based restrictions.		

	Written comments/Document	MKS PAMP	Refiners	Switzerland	Volume 1	Common dities scope	Notwithstanding, CRAFT may be incorporated into existing certification schemes and/or certification schemes may be built on top of CRAFT. This flexibility provided by the Open Source license eliminates from the outset the risk that the CRAFT creates additional "audit burden	Here are a few general comments : -CRAFT should specifically cover all precious metals , or at least platinum and silver that can be extracted in an ASM fashion (generally along with gold) -CRAFT should cover for precious metals all LBMA requirements for ASM, even if those are not OECD requirements. A confirmation by the LBMA that CRAFT does so would be most helpful	Include other precious metals as silver and platinum	Propose to the SC and AG	strategic (AG+SC+team)
133	Written comments/Document	MKS PAMP	Refiners	Switzerland	Volume 4			- Report template is needed - A list of annexes including key documents should be included		Include list of annexes on the website or end of volume 4. Make public available the report template.	editorial (team)
134	Written comments/Document	MKS PAMP	Refiners	Switzerland	Volume 1	Introduction	Organizationa l scope	- In the context of ASM, aggregators/exporters are a due diligence choke point. Could craft as a result provide guidance to the due diligence of such actors ?		Make more explicit that the extended scope apply to aggregators and exporters	editorial (team)
135	Written comments/Document	MKS PAMP	Refiners	Switzerland	Volume 2A			- Certain requirements are very formal. They should be reviewed to ease the burden on the miners (policies, grievance process)		Make less formal the criteria. To see with SC.	technical (SC+team)
136	Written comments/Document	MKS PAMP	Refiners	Switzerland							

	Written comments/Document	Women Rights and Mining (WRM)	No	Women rights group	The Netherlands	Volume 4	Human and Workers' Rights	Module 5	When finalizing the CRAFT-code, ARM might also want to consult WRM's' 10 DO's (Guidance for governments, companies and practitioners to support women's rights and mitigate gender risks during OECD due diligence implementation). Especially DO number 3, 5, 6, and 8 are relevant for the CRAFT-code: 3. DO demonstrate leadership and commitment, including within company management systems 5. DO assess and optimize gender opportunities within your minerals supply chains 6. DO ensure that women's voices are heard and their work in mineral production and trade is valued. 8. DO set specific goals and increase accountability for their achievement For elaborate explanations on these recommendations, please find attached the document of the '10 do's'.		Propose to include the DO as a guidance for Module 5.	technical (SC+team)
137	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 1	Commodities scope		• Gold and other precious metals. Typically sold by AMPs as ore, concentrate or doré	Silver and platinum should be at least be included	Propose to the SC and AG	strategic (AG+SC+team)
138	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 2A	Societal Welfare	M.4/2.2.1/R.2	It is reasonable to believe that the AMP is committed to disclose – if requested – payments of taxes, fees, and royalties in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI). Pass Criterion ("mitigated") The AMP discloses, or declares to be committed to disclose, payments to the national EITI.	We believe this requirement is currently excessive for ASM	It is aligned with OECD DDG. But we can revise the wording to make it clearer	editorial (team)

140	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 2A	Societal Welfare	M.4/5.1.5/R.1	<p>Pass Criterion ("mitigated") The production volumes of the AMP are plausibly aligned with the effective production capacity of the AMP. --- and --- The installed production capacity of the AMP is plausibly aligned with the financial capacity of its members.</p>	Ultimate ownership of the mine should be clearly disclosed		Include the disclose of the ownership of the mine	technical (SC+team)
141	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 4	Human and Workers' Rights	Module 3	<p>The AMP takes steps towards eradicating all worst forms of child labour directly or indirectly related to mining, among persons under the age of 18. Risk: Persons below 18 years of age, within the community, are engaged in work classified by ILO as "worst forms of child labour", directly or indirectly related to the mining activity.</p>	<p>It is unlikely the mine will have sufficient leverage to act on this</p>	<p>Revise the word indirectly for insufficient leverage of the AMP</p>	Revise the change proposed	editorial (team)
142	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 2B	Introduction		<p>Non-binding background information, further comments, explanatory notes and suggested tools are contained in Volume 4 (Guidance Book).</p>	<p>LBMA requirements about environment should be fully reflected here</p>		<p>Not change required. The volume 4 is a guidance book. The environmental criteria are in the Volume 2A (for all commodities) and Volumen 2B (for commodity-specific)</p>	
143	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 2B	Human and Workers' Rights	Module 5		<p>As cyanidation processes exist in a number of contexts classified as ASM, corresponding minimum requirements should be set here</p>		CRAFT already includes the minimum based on the Minamata convention. To see if for cyanidation are other high risks to include	strategic (AG+SC+team)
144	Written comments/Document	MKS PAMP	No	Refiners	Switzerland	Volume 2B	Human and Workers' Rights	Module 5		<p>Minimum environmental requirements should be set so that the mine can satisfy LBMA requirements</p>		To check what are other minimum environmental requirements in LBMA	strategic (AG+SC+team)

148	Written comments/Document	Federal Institute for Geosciences and Natural Resources	No	National Institute	Germany/DRC	Volume 2A	Company Governance	M.4/5.1.5/R.1	Fail Criterion The AMP sells more minerals or metals than it produces and cannot explain where the excess volumes originate. --- or --- The legitimate origin of the investment capital cannot be reasonably explained.	As well as the source of its OPEX? Mine operators may run multiple businesses besides the mine and use these for cross-subsidizing operational costs. That could be easily exploited for money laundry.		Revise the opportunity to strengthen this requirement	technical (SC+team)
149	Written comments/Document	Federal Institute for Geosciences and Natural Resources	No	National Institute	Germany/DRC	Volume 2A	Emissions and land reclamation	M.5/4.2.2/R.1	The AMP avoids serious contamination of water bodies with suspended solids and/or chemicals and fuel residues that put the livelihoods of other water users at risk.	In spite of proper treatment of discharges and waste, a rehabilitation plan for mine closure should be provided.		Rejected (it goes further the high risks). This may be a criterion for the best practice standards such as Fairmined.	
150	Written comments/Document	Federal Institute for Geosciences and Natural Resources	No	National Institute	Germany/DRC	Volume 2B	Emissions and land reclamation	M.5/1.3.11/S.R.4	The AMP takes steps towards elimination of the practice of cyanide leaching of sediments, ore, or tailings to which mercury had been added, without first removing the mercury.	There has to be taken care for proper recycling of cyanide. Next to cyanide, the ore is often treated also with azotic and sulphuric acids which is highly detrimental to environment.		CRAFT already includes the minimum based on the Minamata convention. To see if for cyanidation are other high risks to include.	technical (SC+team)

151	Written comments/Document	Federal Institute for Geosciences and Natural Resources	No	National Institute	Germany/DRC	Volume 2B	3.Cobalt Specific requirements	Module 5	Cobalt mining in general comes along with copper mining. There should be a check for radioactivity and proper storing and handling in consequence. Monitoring of dose limits could be difficult for AMP to realize. Dust control is essential due to cancerous characteristics. There should be particular Health and Security efforts in view to Manganese due to the risk of the occurrence of birth defects (See van Brusselen 2019 and Kayembe-Kitenge 2018) Acid rock drainage can appear in association with pyrite.	To propose in the SC and AG	strategic (AG+SC+team)
152	Questionnaires record on communications	Asomuselupaz	No	Miner	Colombia	Volume 3	Schemes + communication and adoption	Module 1	* Prefiere el lema CRAFT, minería en la que confiar * Mejor manera de recopilar la información sobre CRAFT: haciendo entrevistas a las pmapes en campo y se de a conocer el sitio de trabajo y se muestre la realizada de como se trabaja	Not change proposed. Recommendation for communication and implementation.	

153	Questionnaire s record on communications	Asociación Colombiana de Minería	No	Miner	Colombia	Volume 3	Schemes + communication and adoption	Module 1	* Considera que debemos cambiar el nombre de PMAPE * Prefiere el lema CRAFT, pasaporte a mercados formales * Mejor manera de recopilar la información sobre CRAFT: con ayuda de asociaciones y agremiaciones		Not change proposed. Recommendation for slogan, communication and application.		
154	Questionnaire s record on communications	ANEEMAS	No	Public institution	Burkina Faso	Volume 3	Schemes + communication and adoption	Module 1	* Prefere le slogan : CRAFT, engagez-vous avec vos minérais * Propose: Créer une plateforme d'échanges pour les EMAPE et CRAFT pourrait y trouver les informations en lien avec ARM		Not change proposed. Recommendation for slogan, communication and application.		
155	Questionnaire s record on communications	ARM	No	NGO	Colombia	Volume 3	Schemes + communication and adoption	Module 1	* Prefere le slogan : CRAFT, engagez-vous avec vos minérais * Propose: Il pourrait y avoir une boîte de dialogue directement sur le site internet (ex: onglet "contact", avec la possibilité de rédiger directement un courrier ou de fournir ces informations via un questionnaire en ligne); L' information serait alors reçue par le gestionnaire ARM, qui sera responsable de la traiter avant de publier.	Set up a dialogue bodirectly on the CRAFT website The information would then be received by ARM, that would be responsible for processing it prior to publication.		Not change proposed. Recommendation communication and website.	

156	Questionnaire s record on Company governance	GemFair	No	NGO	The United Kingdom	Volume 4	Compan y governa nce / Corpora te Management	* <u>About extortion</u> : It would be good to add a way for members of the AMP to make a complaint. Often, even if physical coercion isn't at play, the individual will feel obliged to make an illegal payment. Perhaps include that the procedure provides whistleblowing options? * <u>About Bribery and Facilitation</u> : As facilitation payments are very common in the ASM sector, perhaps add language around this? Or give an example - such as paying an unofficial fee to fast-track a mine licence. * <u>About money laundering</u> : This doesn't fully address the issue of beneficial ownership, as it applies to an informal sector. Financiers of ASM sites may have a stake in other, illegal activities, and they are very hard to conduct due diligence on. Is it the AMP's responsibility to do this kind of vetting, or would it rather be the CRAFT scheme's job? * Does not agree with the way the criterion <u>about legal compliance</u> is written To consider: This section could go into a bit more detail. Recognising that the governance structure and key actors at mine sites may have overlapping levels of influence over workers' practices and the overall performance of a mine site. How they are organised and made to align on decisions relating to improving standards	*About extortion: It would be good to add a way for members of the AMP to make a complaint. Often, even if physical coercion isn't at play, the individual will feel obliged to make an illegal payment. Perhaps include that the procedure provides whistleblowing options? * About Bribery and Facilitation: add language around this? Or give an example - such as paying an unofficial fee to fast-track a mine licence. About money laundering: Is it the AMP's responsibility to do this kind of vetting, or would it rather be the CRAFT scheme's job? About legal compliance: the clause should provide a bit more detail on what is expected (assuming the manual provides more detail on how the AMP can go about it...)	About extortion: Perhaps include that the procedure provides whistleblowing options? About Bribery and facilitation: Add language around this? Or give an example - such as paying an unofficial fee to fast-track a mine licence.	See the option to add clarity in those criteria	editorial
157	Questionnaire s record on Company governance	Heimerle + Meule GmbH	No	Refiner	Germany	Volume 2A	Compan y governa nce / Corpora te Management	Agrees with the way criteria are written		Not change proposed. Affirmative comment of agreement		

161	Questionnaire s record on Company governance	Marie Béatrice TASSIMBED O/TAPSOBA	No	Individual	Burkina Faso	Volume 2A	Compan y governa nce / Corpora te Management		Agrees with the way criteria are written			Not change proposed. Affirmative comment of agreement.	
162	Questionnaire s record for miners	Cooperativ as da Zambezia	No	Miner	Mozam bique	Volu me 1	CRAFT report	Module 1	*98% Agree with the new structure of the CRAFT code *85% Agree with the fact that is possible for miners to elaborate a CRAFT report *It would serve for: 46% Internal management 61% Define priorities 52% To present oneself to buyers Make field visits and interviews with diggers members of mining cooperatives * 77% Agree with the fact that the new criterion on mining productivity is a priority for ASMP * 78% Think the name AMP should be changed		Change the name of PMAPE and AMP to make simple for understanding.	Change the name of PMAPE and AMP to make simple for understanding.	Technica l (SC+team)
163	Questionnaire s record for miners	Agencia Nacional de Minería	No	Public institution	Colomb ia	Volu me 1	CRAFT report	Module 1	High level of acceptance to include the new criterion of productivity (78% of acceptation).	High level of acceptance to include the new criterion of productivity (78% of acceptation).	Strategic (AG+SC+team)		
164	Questionnaire s record for miners	Gramalote Colombia Limited	No	Miner	Colomb ia	Volu me 1	CRAFT report	Module 1	Not change proposed. Interesting to see the approval of new structure (98%).	Not change proposed. Interesting to see the approval of new structure (98%).			
165	Questionnaire s record for miners	Mina La Gabriela. Tarazá (ANT)	No	Miner	Colomb ia	Volu me 1	CRAFT report	Module 1	* 98% Agree with the new structure of the CRAFT code * CRAFT Report would mostly serve to define priorities * 78% think the name AMP should be changed (take into account the fact that it includes spanish and french terms) * 77% Agree with the fact that the new criterion on mining productivity is a priority for ASMP	* 98% Agree with the new structure of the CRAFT code * CRAFT Report would mostly serve to define priorities * 78% think the name AMP should be changed (take into account the fact that it includes spanish and french terms) * 77% Agree with the fact that the new criterion on mining productivity is a priority for ASMP	Not change proposed. *85% Agree with the fact that is possible for miners to elaborate a CRAFT report *It would serve for: 46% Internal management 61% Define priorities 52% To present oneself to buyers		
166	Questionnaire s record for miners	Asomuselupaz	No	Miner	Colomb ia	Volu me 1	CRAFT report	Module 1					
167	Questionnaire s record for miners	Independiente	No	Individual	Colomb ia	Volu me 1	CRAFT report	Module 1					

168	Questionnaire s record for miners	HUGO FERNANDO MUÑOZ OCAMPO Ingeniero Consultor	No	Individual	Colombia	Volume 1	CRAFT report	Module 1							
169	Questionnaire s record for miners	Asociación Colombiana de Minería	No	Miner	Colombia	Volume 1	CRAFT report	Module 1							
170	Questionnaire s record for miners	Fundación EcoAndina	No	NGO	Colombia	Volume 1	CRAFT report	Module 1							
171	Questionnaire s record for miners	ONG KARKARA	No	NGO	Burkina Faso	Volume 1	CRAFT report	Module 1							
172	Questionnaire s record for miners	Direction Nationale de la Géologie et des Mines	No	Public institution	Burkina Faso	Volume 1	CRAFT report	Module 1							
173	Questionnaire s record for experts on other minerals	British Geological Survey	No	Public institution	The United Kingdom	Volume 2B	Mineral specific requirements	Module 5	*33% Agree with the 4 contexts given to consider legitimacy for AMP * As referring to legitimacy: we could add or explicit in one of the scenarios,				Revise the legitimacy concepts (33%)	Revise the legitimacy cases because low level of approval (33%)	Strategic (AG+SC+ team)

	Questionnaire s record for experts on other minerals	Responsible Mica Initiative	No	NGO	India	Volu me 2B	Mineral specific require ments	Module 5	Producción de facto, existencia de canales de comercialización aprobados por el Estado pero no uso de los mismos * 75% Agree with the new structure of the CRAFT code * Those topics apply to Gold, Cobalt, Gems, Diamond, Mica, Iron, Aluminium, Manganese: 93% Legitimacy, 48% Torture-free, 93% Forced labor-free, 63% Child Labor-free (Beyond the worst forms), 96% Sexual violence and gender discrimination-free, 89% Gross Human Rights violation-free, 88% Free of armed groups influence, 81% Free of War Crimes, 81% Free of support to Non-state Armed groups: Extortion, 85% Money laundering-free, 93% Bribery-free, 85% Tax, duty or royalty evasion-free, 93% Free of public or private security forces that are known to have abused gross human right, 70% Free of Wrongful practices with water and mercury, 96% Free of pollution and contamination of water sources, 100% First steps on internal organization rules, 100% Basic mining safety (protective equipment use and rules), 96% Child labor-free, 96% Discrimination-free, 92% Gender violence-free, 88% Free of conflicts with other economic activities				
174	Questionnaire s record for experts on other minerals	BMW Group	No	Private company	Germany	Volu me 2B	Mineral specific require ments	Module 5	*33% Agree with the 4 contexts given to consider legitimacy for AMP * Those topics should be considered: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market,Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves	Include other elements for other commodities	* Those topics should be considered for other minerals: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market,Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves	Strategic (AG+SC+team)	
175	Questionnaire s record for experts on other minerals	IMPACT	No	NGO	Canada/ DRC	Volu me 2B	Mineral specific require ments	Module 5	*33% Agree with the 4 contexts given to consider legitimacy for AMP * Those topics should be considered: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market,Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves	Revise the rate of acceptation of the current CRAFT criteria regarding the topics that apply to other commodities	See the rate for the level of applicability of some criteria for other commodities	Technica l (SC+team)	
176	Questionnaire s record for experts on other minerals	Diamonds for Peace	No	NGO		Volu me 2B	Mineral specific require ments	Module 5	*33% Agree with the 4 contexts given to consider legitimacy for AMP * Those topics should be considered: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market,Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves				
177	Questionnaire s record for experts on other minerals	Freelance Geologist/ Gemologist	No	Individual		Volu me 2B	Mineral specific require ments	Module 5	*33% Agree with the 4 contexts given to consider legitimacy for AMP * Those topics should be considered: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market,Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves				
178	Questionnaire s record for experts on other minerals								*33% Agree with the 4 contexts given to consider legitimacy for AMP * Those topics should be considered: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market,Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves				

179	Questionnaire s record for experts on other minerals	Orion&Sirius Gems	No	Private company		Volume 2B	Mineral specific requirements	Module 5	* Those topics should be considered: Operation in protected areas, Artisanal processing, Modern Slavery, Facility to access financial fund, Post Colonial treatments of local communities, Mining operation closure, Conditions of coal market, Cobalt washing, Corruption, Training/Information, Cultural heritage preservations, security in underground mining operations, Alternative work, Mineral resources and reserves				
180	Questionnaire s record for experts on other minerals	GIZ	No	Public institution	Chile	Volume 2B	Mineral specific requirements	Module 5					
181	Questionnaire s record for experts on other minerals	HUGO FERNANDO MUÑOZ OCAMPO Ingeniero Consultor	No	Individual	Colombia	Volume 2B	Mineral specific requirements	Module 5					
182	Questionnaire s record for experts on other minerals	Asociación Colombiana de Minería	No	Miner	Colombia	Volume 2B	Mineral specific requirements	Module 5					
183	Questionnaire s record for refiners & the market	Valcambi	No	Refiner	Switzerland	Volume 3	Schemes + communication and adoption		*25% Agree with the 4 contexts given to consider legitimacy for AMP * As referring to legitimacy: #4 has no guarantee at all and legitimacy is different from legality The four scenarios are clear. However, in practice it is difficult to define what "active" implementation really means? As an example: Colombia has a regime for ASM of which certain elements are actively implemented and enforced, others are not. Would this be scenario 1 or 2? * 74% Agree with the new structure of the		Revise the legitimacy cases because low level of approval (25%). Improve the definition of active implemented	Strategic (AG+SC+team)	
184	Questionnaire s record for refiners & the market	Leopard Gold Trading Services	No	Trader	DRC	Volume 3	Schemes + communication and adoption			Not change proposed. Interesting to see the approval of new structure (74%).			

185	Questionnaire s record for refiners & the market	Heimerle + Meule GmbH	No	Refiner	Germany	Volume 3	Scheme s + communication and adoption	CRAFT code * The CRAFT report could serve refiners for: 1- The starting point of your due diligence 2- To get to know your supplier 3- To identify in which areas the miners need support in improvement 4- Identifying risks Formalizes the sector. Could be a good indicator for listing sites of good practice in a given country or area. It can be an indicator of the mines commitment to responsible production. * Consider the level of importance of the CRAFT report as 1- High 2- Medium 2- Low * The most important item that the CRAFT report must have:	*25% Agree with the 4 contexts given to consider legitimacy for AMP. It is difficult to define what "active" implementation really means? The CRAFT report would mostly serve refiners for "The starting point of your due diligence" Consider the level of importance of the CRAFT report as: "High" The most important item that the CRAFT report must have "Description of the way in which risks are mitigated" The added value of CRAFT for the gold industry "A way to comply with the OECD Due Diligence Guidance and the normative framework on due diligence."			Not change proposed. Elements for the value proposal of CRAFT. See more in the column of original text. * The added value of CRAFT for the gold industry 1- A way to comply with the OECD Due Diligence Guidance and the normative framework on due diligence. 2- A tool that enables improvements in the ASM sector. 3- A guidance that helps artisanal and small scale miners to implement due diligence.	
186	Questionnaire s record for refiners & the market	MARENA GOLD REFINERY	No	Refiner		Volume 3	Scheme s + communication and adoption	1- Description of the way in which risks are mitigated 2- List of criteria the mining operations complies and doesn't comply with 3- Organizational details of the mining operation 4- Improvement plan addressing the issues that should be improved The organization of the sector Whether or not the plot or area subject to artisanal mining is formal or informal * The added value of CRAFT for the gold industry	Due Diligence Guidance and the normative framework on due diligence." 100% of the market think that the mechanism of assurance of the CRAFT Code is clear Market would likely share learned lessons with other CRAFT users through Email				
187	Questionnaire s record for refiners & the market	Direction Nationale de la Géologie et des mines	No	Public institution	Burkina Faso	Volume 3	Scheme s + communication and adoption						

188	Questionnaire s record for refiners & the market	Alloy	No	Refiner	Colomb ia	Volu me 3	Scheme s + commu nication and adoptio n	industry	1- A way to comply with the OECD Due Diligence Guidance and the normative framework on due diligence. 2- A tool that enables improvements in the ASM sector. 3- A guidance that helps artisanal and small scale miners to implement due diligence.	
189	Questionnaire s record for refiners & the market	GRUPO ALTEA SAS	No	Trader	Colomb ia	Volu me 3	Scheme s + commu nication and adoptio n		Allowing refiners to engage with ASM the most important sector of mining Allows to fight against counterfeiting and to replenish the state coffers, secures jobs * 62% Consider that CRAFT facilitates Due	

190	Questionnaires record on human and workers rights	Responsible Gold Agreement (Netherlands)	No	NGO	Netherlands	Human & workers' Rights		* Agree with the way criterion about <u>Child Labour & Education</u> is written To consider: Include the following in guidance book (CRAFT volume 4): The AMP makes efforts and takes steps to raise awareness that children in worst forms of child labour is unacceptable. In relation to Pass criterion 1: baseline assessment shall also indicate impacts of the child's work on their education (school enrolment or drop-out and the regularity of school attendance as well as performance) and household characteristics. In relation to Pass criterion 2: if children between age 15-18 are detected in the worst forms of child labor, they must be immediately withdrawn. Affected children should be supported in finding safe alternative income generation opportunities. In the guidance book it is stated that "the AMP shall be aware that this strict prohibition of production-related worst forms of child labour might create unintended consequences of driving affected children into even worse conditions. If such worst forms of child labour had been an issue prior to the adoption of the CRAFT, a risk mitigation plan to prevent such unintended consequences must be in place". Such a risk mitigation plan, paying attention to (safe) alternative	About Child Labour: The AMP makes efforts and takes steps to raise awareness that children in worst forms of child labour is unacceptable. In relation to Pass criterion 1: baseline assessment shall also indicate impacts of the child's work on their education (school enrolment or drop-out and the regularity of school attendance as well as performance) and household characteristics. In relation to Pass criterion 2: if children between age 15-18 are detected in the worst forms of child labor, they must be immediately withdrawn. Affected children should be supported in finding safe alternative income generation opportunities. In the guidance book it is stated that "the AMP shall be aware that this strict prohibition of	Include in Guidance Book. Volume 4.	editorial (team)
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191	Questionnaire s record on human and workers rights	Responsible Gold Agreement (Netherlands)	No	NGO	Netherlands	Volume 4	Human & workers' Rights		* Agree with the way criterion about disciplinary practices ad violence / Other Gross Human Rights Abuses are written To consider: The human rights body contacted to obtain testimonies should (be encouraged to) pay particular attention to marginalised and vulnerable groups, including women and children. In seeking testimonies about the existence of such serious human rights abuses, also children's perspectives should be obtained. Children's perceptions and needs may not be understood or expressed accurately by adults.	Include Guidance Book	Include in Guidance Book. Volume 4.	editorial (team)
192	Questionnaire s record on human and workers rights	Responsible Gold Agreement (Netherlands)	No	NGO	Netherlands	Volume 2A	Human & workers' Rights		* Agree with the way criterion about Child Labour & Education (mod 5) is written To consider: Include in guidance book: The AMP makes efforts and takes steps to raise awareness that children in worst forms of child labour is unacceptable. If children between age 15-18 are detected in the worst forms of child labor, they must be immediately withdrawn. These children should be helped in finding safe alternative income generation opportunities. The guidance book should also include guidance and minimum requirements of such 'mechanism'.	Include Guidance Book	Include in Guidance Book. Volume 4.	editorial (team)

193	Questionnaire s record on human and workers rights	Responsible Gold Agreement (Netherlands)	No	NGO	Netherlands	Volume 4	Human & workers' Rights		* Agree with the way criterion about women rights 1 is written To consider: Include in guidance book: The AMP makes efforts and takes steps to raise awareness of the need to eliminate child labour. The AMP should conduct child protection trainings at all levels and in all necessary languages ensuring the information is user-friendly and accessible for miners with lower literacy levels as well. The guidance book should also include guidance and minimum requirements of such 'mechanism'.	Include Guidance Book	Include in Guidance Book. Volume 4.	editorial (team)
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194	Questionnaires record on human and workers rights	Responsible Gold Agreement (Netherlands)	No	NGO	Netherlands	Volume 4	Human & workers' Rights	M.5 / 1.1.3 / R.1	* Do not agree with the way criterion about women rights 2 is written To consider: The criteria is vague and, what is more, difficult to measure (i.e. 'work-place culture'). The formulation of the criteria does not capture the appropriate guidance on M.5 / 1.1.3 / R.1 outlined in Volume 4 (Guidance Book). This guidance includes the development of a policy on preventing and responding to sexual violence and harassment and related staff training, and setting up a grievance mechanism with qualified representatives incl. women's on committee. Also, Volume 4 states that, in principle, the risk of sexual violence and harassment should never be declared as "controlled", because considering the risk controlled may lead to decreased awareness of the issue. Therefore, we recommend to do away with the criteria and instead include a Pass and Progress Criteria for M.5 / 1.1.3 / R.1: Guidance on Pass Criteria: In its CRAFT Report the AMP shall summarize it's (specific) policy on preventing and responding to sexual violence and harassment, including an appropriate grievance mechanism. Guidance on Progress Criteria: In its CRAFT Report the AMP shall describe measures undertaken to prevent and respond to sexual violence and	Include Guidance Book	Include in Guidance Book. Volume 4.	editorial (team)
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195	Questionnaire s record on human and workers rights	Responsible Gold Agreement (Netherlands)	No	The Netherlands	Volume 4	Volume 4	M.5 / 1.1.3 / R.1	* Do not agree with the way criterion about discrimination and diversity is written To consider: The formulation of the criteria does not capture the intent of M.5 / 1.1.3 / R.1 as outlined in Volume 4 (Guidance Book), which concerns action to overcome: i. gender-based restrictions of access to mineral resources and benefits; and ii. exclusion of women from decision making about mining resources. Furthermore, Volume 4 offers more concrete guidance to 'take steps to respect women's rights' as it proposes that the AMP conducts a gender survey to investigate existing gender-based restrictions and, presumably, to design appropriate steps accordingly (e.g., an equal opportunity action plan). Also, similar to M.5 / 1.1.3 / R.1, it is questionable if this risk can ever be considered "controlled". Therefore, we recommend to include Pass and Progress Criteria for M.5 / 1.1.3 / R.2: Guidance on Pass Criteria: In its CRAFT Report the AMP shall summarize the results of the proposed gender survey and an equal opportunity action plan to address identified gender-based restrictions. Guidance on Progress Criteria: In its CRAFT Report the AMP shall describe measures undertaken to address	Include Guidance Book	Include in Guidance Book. Volume 4.	editorial (team)
196	Questionnaire s record on human and workers rights	Forêts et Développement Rural (FODER)	No	Public institution	Burkina Faso	Volume 2A	Human & workers' Rights	*83% Agree with the way criterion about Child Labour & Education (mod3) is written To consider:	About Child Labour & Education (mod3): Thus, there is a need to categorised the	Not change proposed. High level of acceptation of criteria of child labor (83%).	

	Questionnaire s record on human and workers rights	IndustriALL Global Union	No	Private company		Volu me 2A	Human & workers' Rights					
197	Questionnaire s record on human and workers rights	Asomuselupaz	No	Miner	Colombia	Volu me 4	Human & workers' Rights		The definition of hazardous works is not clear. Most works in artisanal mining are hazardous. Thus, there is a need to categorised the hazardous works System of monitoring and verification has to be in place What kind of mining is being considered? national or international mining * 83% Agree with the way criterion about forced labour is written To consider: Even it is a voluntary work, not being bonded, labor rights and standards are to be observed Institutions that monitor forced labour * 89% Agree with the way criterion about Disciplinary Practices and Violence is written	hazardous works and there is need for a good classification of "worsts form of child labor". This classification will allow misinterpretation by stakeholders There should be a mechanism that include worker's representatives About Child Labour & Education (mod5): Keep in mind documentation such as a civil registry, identity card, citizenship card	56% Agree with the way criterion about Personal Protective Equipment is written To consider: Appropriate compliance to safety regulations has to be in place with workers representatives	technica l (SC+team)
198	Questionnaire s record on human and workers rights	Asociación Colombiana de Minería	No	Miner	Colombia	Volu me 2A	Human & workers' Rights		See the other proposed changes for inclusion in volume 4 or volume 2A.	technica l (SC+team)		

200	Questionnaires record on human and workers rights	ARM	No	NGO	Burkina Faso	Volume 2A	Human & workers' Rights	<p>Do not agree with the way criterion about Child Labour & Education (mod3) is written To consider: 1) More than an assessment, would'nt it be preferable for the AMP to show what kind of measures he does undertake to mitigate the risk of child labour. If the AMP has no children working in his mining, I don't see why he should undertake an assessment.. but yes, he should show he has implemented some measure to control and prevent child labour. In case there is child labour, then the AMP should undertake an assessment to understand what kind of work children are doing, who are these children (age, family situation etc.) etc. and then take some measure to prevent worst forms as mentioned in "Critère de conformité #2". Then, in "Critère de conformité #2" I think the formulation of "affirmer de manière crédible" is not very clear... +++ "chaîne d'approvisionnement interne" = not very clear +++ We mention "considérés comme pires formes de travail des enfants" ... it is a bit confused with module 5 where we also refer to worst forms... so a bigger distinction should be made * Do not agree with the wav criterion</p>	About Child Labour & Education (mod3): More than an assessment, would'nt it be preferable for the AMP to show what kind of measures he does undertake to mitigate the risk of child labour. If the AMP has no children working in his mining, I don't see why he should undertake an assessment.. but yes, he should show he has implemented some measure to control and prevent child labour. About forced labour: "Le PMAPE peut affirmer de manière crédible" I think we should be more precise to orientate the miners in what that means... but maybe we can find this in the section dedicated to the AMPs... + Maybe we could think of something like "credible testimonies of the workers..."	See the other proposed changes for inclusion in volume 4 or volume 2A. technical (SC+team)
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201	Questionnaire s record on the environment	IUCN NL	No	Netherl ands	Enviro nment (Use of Natural Resourc es & Emissio ns and Land Reclama tion)	Volu me 2A	Module 5	* Do not agree with the way criterion about Legally Protected Areas is written To consider: This tekst is not specific enough. Suggested to formulate to " avoid working in World Heritage Sites; sites on a State Party's official Tentative List for World Heritage Site inscription; IUCN category I-III protected areas; IUCN category I-V marine protected areas; core areas of UNESCO biosphere reserves; and areas where indigenous peoples live in (voluntary) isolation or where it is assumed that they might live" * Do not agree with the way criterion about Water Management is written To consider: In the risk natural ecosystems should be recognized as a valid water user as well. * Do not agree with the way criterion about Wastewater & Water Quality is written To consider: Contamination is a critical issues for ecosystems and nature as well. And in many countries nature is recognized as an equal water user to humans. Suggested change to final part of first sentence " that put the livelihoods and health of other water users (including biodiversity) at risk.
							About Legally Protected Areas: Suggested to formulate to " avoid working in World Heritage Sites; sites on a State Party's official Tentative List for World Heritage Site inscription; IUCN category I-III protected areas; IUCN category I-V marine protected areas; core areas of UNESCO biosphere reserves; and areas where indigenous peoples live in (voluntary) isolation or where it is assumed that they might live" About Water Management: In the risk natural ecosystems should be recognized as a valid water user as well. About Wastewater & Water Quality: Suggested change to final part of first sentence " that put the livelihoods and health of other water users	See the other proposed changes for inclusion in volume 4 or volume 2A. technica l (SC+team)

202	Questionnaire s record on the environment	British Geological Survey	No	Public institution	The United Kingdom	Volume 4	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5	* Agree with the way criterion about Conflict with Agriculture is written To consider: extend to water resources as well as land * Agree with the way criterion about Wastewater & Water Quality is written To consider: other risks: i.e mine tailings can contaminated water resources (groundwater and rivers) through leaching or erosion	About Conflict with Agriculture : extend to water resources as well as land extend to water resources as well as land About Wastewater & Water Quality: other risks that could be mentioned in Volume 4: mine tailings can contaminated water resources (groundwater and rivers) through leaching or erosion	See the other proposed changes for inclusion in volume 4 or volume 2A.	Editorial (team)
203	Questionnaire s record on the environment	Ambassade de France	No	Public institution	France	Volume 2A	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5	* Agree with the way criterion about Legally Protected Areas is written To consider: differentiate between consumptive and non-consumptive uses (water quality criteria) * Agree with the way criterion about Water Management is written To consider: Release of the map of protected areas * Agree with the way criterion about Wastewater & Water Quality is written To consider: take into account spreading in groundwater as well	About Legally Protected Areas: differentiate between consumptive and non-consumptive uses (water quality criteria) About Wastewater & Water Quality: take into account spreading in groundwater as well	Add clarity to be more specific	Editorial (team)

204	Questionnaires record on the environment	ARM	No	NGO	Burkina Faso	Volume 2A	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5

* Do not agree with the way criterion about Legally Protected Areas is written
To consider: **Maybe we should first that miners have an official authorization to use the water?** And so if they respect the quantity that is allowed by the authorities then they should not look for the consensus with other users... If there is not official authorization, then yes, they should seek an agreement... but I am not sure how miners can show that... Maybe through testimonies of third parties?

* Do not agree with the way criterion about Conflict with Agriculture is written
To consider: **Not very clear... It should not be only about conflict solved; it should be about a fair distribution first.** Also, I think that if the miners that a right to operate such as a mining title, then they should operate according to the rules, but I am not sure he we should then ask them to coordinate with other users? Of course, if mining operations are still informal with no official to operate in a determined area, it can be slightly differet and in this case I understand there should be a coordinated efforts to ensure farmers, fish growers etc. have an access too to the land.

Do not agree with the way criterion about Legally Protected Areas is written
* Do not agree with the way criterion about Conflict with Agriculture is written

About Legally Protected Areas: In the criteria ensure first that miners have an official authorization to use the water? If there is not official authorization, then yes, they should seek an agreement... but I am not sure how miners can show that... Maybe through testimonies of third parties?

Evaluate recommendation for clarity in the criterion

Editorial (team)

205	Questionnaire s record on the environment	HUGO FERNANDO MUÑOZ OCAMPO Ingeniero Consultor	No	Individual	Colomb ia	Volu me 4	Environ ment (Use of Natural Resourc es & Emissio ns and Land Reclama tion)	Module 5	<p>* Agree with the way criterion about Legally Protected Areas is written To consider: Quality of the water discharged to the water sources after the exploitation process and benefit of the minerals</p> <p>* Agree with the way criterion about Conflict with Agriculture is written To consider: Conflict resolution for land use in mining and other activities</p> <p>* Agree with the way criterion about Water Management is written To consider: Quantity and quality of water used by the AMP</p> <p>* Agree with the way criterion about Wastewater & Water Quality is written To consider: Treatment of waste rock material from the processing plants</p>	<p>About Water Management: Quantity and quality of water used by the AMP (include in the criterion)</p> <p>About Wastewater & Water Quality: To consider treatment of waste rock material from the processing plants (Volume 4)</p>	Add to the Volume 4	Editorial (team)
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206	Questionnaires record on the environment	Programa Nacional de Gestión de Químicos (PNGQ)- PNUD/MAE	No	Public institution	Ecuador	Volume 4	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5	<p>* Agree with the way criterion about Legally Protected Areas is written To consider: the remediation and treatment of water used in mining activities</p> <p>* Agree with the way criterion about Conflict with Agriculture is written To consider: It should be considered that depending on the type of mining, land use is in an underground manner in some cases, so the surface as such is not affected</p> <p>* Do not agree with the way criterion about Water Management is written To consider: It is very similar to the question, however it must be taken into account that opposition to the use of water in a certain mining sector is by groups outside the community close to the activity</p> <p>* Agree with the way criterion about Wastewater & Water Quality is written To consider: The type of water treatment given to mining effluents by each mining company must be carefully evaluated in order to avoid direct contamination of water sources</p>	<p>About Legally Protected Areas: consider the remediation and treatment of water used in mining activities (in the criterion)</p> <p>About conflict with Agriculture: It should be considered that depending on the type of mining, land use is in an underground manner in some cases, so the surface as such is not affected (Volume 4)</p> <p>About Water Management: it must be taken into account that opposition to the use of water in a certain mining sector is by groups outside the community close to the activity (Volume 4)</p> <p>about Wastewater & Water Quality is written To consider: The type of water treatment given to mining effluents by each</p>	Revise proposal to improve Volume 4	Editorial (team)
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207	Questionnaire s record on the environment	Universidad del Rosario	No	Academia	Colombia	Volume 4	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5	* Do not agree with the way criterion about Legally Protected Areas is written To consider: Need to specify what are water bodies * Do not agree with the way criterion about Water Management is written To consider: Llegado a llegar, sugiero un cambio de palabras para que no suene redundante * Do not agree with the way criterion about Wastewater & Water Quality is written To consider: Cuando colocan que los riegos derivados son de carácter considerativo, es decir, cuando dices se considera que no son graves, cuando fices consideradas por que pienso yo que hace falta algo allí que me indique si es o no es grave, no puede quedar en términos de consideración, es como algo que carece de veracidad técnica.	About Wastewater & Water Quality: When they say that the derived risks are of a considerate nature, that is to say, when they say that they are not serious, when they say that they are considered, it is because I think that something is needed there to indicate to me whether or not it is serious, it cannot remain in terms of consideration, it is like something that lacks technical veracity.	about Legally Protected Areas: Need to specify what are water bodies about Water Management : In spanish (Llegado a llegar, sugiero un cambio de palabras para que no suene redundante)	Revise the wording in the criterion of module 5 regarding environment.	Editorial (team)
208	Questionnaire s record on the environment	Forêts et Développement Rural (FODER)	No	Public institution	Burkina Faso	Volume 2A	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5	* 84% Agree with the way criterion about Legally Protected Areas is written To consider: As a rule, mining is prohibited in Protected Areas, so there is no coordination between the AMP and the authorities in charge. Specifically for Páramos (in colombia), they must leave the area through 2 figures Substitution Program and Reconversion Program or Labor Relocation, which will be regulated		See recommendation to change the criterion writing about impacts	editorial (team)	

209	Questionnaire s record on the environment	Heimerle + Meule GmbH	No	Refiner	German y	Volume 2A	Environ ment (Use of Natural Resourc es & Emissio ns and Land Reclama tion)	Module 5	soon. The transition time will be the time of the Mine Closure. Could include language on minimization of impacts (in addition to avoidance) and restoration/rehabilitation. Align to specific national regulations covering such topic as well as specific protected areas *90% Agree with the way criterion about Conflict with Agriculture is written	Add the possibility of other conflicts in Volume 4.
210	Questionnaire s record on the environment	ANEEMAS	No	Public institution	Burkina Faso	Volume 2A	Environ ment (Use of Natural Resourc es & Emissio ns and Land Reclama tion)	Module 5	To consider: Water sources agreed upon with communities and miners, where this can be done. We must not mitigate the activity of extractions and the survival activities of the populations. Also include urban expansion or other uses established by the municipalities. There is also conflict there. * 68% Agree with the way criterion about Water Management is written	About legally protected areas: Could include language on minimization of impacts (in addition to avoidance) and restoration/rehabilitation. Align to specific national regulations covering such topic as well as specific protected areas
211	Questionnaire s record on the environment	Marie Béatrice TASSIMBED O/TAPSOBA	No	Individual	Burkina Faso	Volume 2A	Environ ment (Use of Natural Resourc es & Emissio ns and Land Reclama tion)	Module 5	* 78% Agree with the way criterion about Wastewater & Water Quality is written about Conflict with Agriculture : Also include urban expansion or other	editorial (team)

	Questionnaire s record on the environment	BECOREN	No	Individual	Burkina Faso	Volume 2A	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5		
212	Questionnaire s record on the environment	Adriana Delgado Ortega	No	Individual	Colombia	Volume 2A	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5		
213	Questionnaire s record on the environment	Asomuselupaz	No	Miner	Colombia	Volume 2A	Environment (Use of Natural Resources & Emissions and Land Reclamation)	Module 5		
214	Questionnaire s record on the environment								uses established by the municipalities. There is also conflict there.	

215	Questionnaire s record on societal welfare	Social Solutions	No	Private company	Suriname	Volu me 2A	Societal Welfare	Module 4	<p>* Agree with the way criterion about Conflict-Affected and High-Risk Areas is written To consider: This requires that the AMP has or hires a person who is able to analyse the OECD criteria and write a report about this. How realist is this?</p> <p>* Does not agree with the way criterion about war crimes... is written To consider: Very difficult to prove</p> <p>* Does not agree with the way criterion about illegal control by non-state armed groups is written To consider: Who provides this evidence. What does the evidence consist off. This seems difficult to prove</p> <p>* Agree with the way criterion about Security Forces (Annell, par. 5) is written To consider: same is before; how will you prove this. And who provides the proof.</p> <p>* Does not agree with the way criterion about Security Forces (Annell, par. 6) is written To consider: There are different criteria formulated as one. (1) no tensions between AMP and security forces, and (2) AMP only seek support from security forces as needed</p> <p>* Agree with the way criterion about Security Forces (Annell, par. 8) is written To consider: This could be extended to national security forces or other</p>	<p>About Security Forces (Annell, par. 6): There are different criteria formulated as one. (1) no tensions between AMP and security forces, and (2) AMP only seek support from security forces as needed. Separate them</p> <p>About Security Forces (Annell, par. 8): This could be extended to national security forces or other government officials</p>	Revise the proposal of evidence regarding conflict, money laundering, extortion and relationship with armed groups	Technica l (SC+team)
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	Questionnaire s record on societal welfare	ARM	No	NGO	Burkina Faso	Volume 2A	Societal Welfare	Module 4	* Does not agree with the way criterion about war crimes... is written To consider: I think it is quite difficult, maybe risky, to show that... We should think about something more specific maybe. We should think about a couple of concrete examples and how they could demonstrate that... * Does not agree with the way criterion about illegal control by non-state armed groups is written To consider: Same as previous criteria. Would a self declaration be enough? * Does not agree with the way criterion about Security Forces (Annell, par. 5) is written To consider: How the AMP will demonstrate or state that? Could be better if the AMP would declare something like they do not pay tax or make all the necessary efforts to mitigate this risk? * does not agree with the way criterion about Security Forces (Annell, par. 6) is written To consider: In the criteria, add that this support is aimed at ensuring the rule of law * Does not agree with the way criterion about Security Forces (Annell, par. 9) is written	Does not agree with the way criterion about illegal control by non-state armed groups is written --> Same as previous criteria. Would a self declaration be enough?	About war crimes.: We should think about something more specific maybe. We should think about a couple of concrete examples and how they could demonstrate that... (to include in vol 4) About Security Forces (Annex II, par. 5): Could be better if the AMP would declare something like they do not pay tax or make all the necessary efforts to mitigate this risk? About Security Forces (Annex II, par. 6) In the criteria, add that this support is aimed at ensuring the rule of law About Payment of Taxes & EITI 2: "Divulquer" sound like it can be made public... Many miners don't want to make it public because they are scared about	Revise the wording of the criteria of Module 4 and recommendations	Editorial (team)
216	Questionnaire s record on societal welfare	Asomuselupaz	No	Miner	Colombia	Volume 2A	Societal Welfare	Module 4	* 83% Agree with the way criterion about Conflict-Affected and High-Risk Areas is written * 78% Agree with the way criterion about war crimes... is written	Only 33% Agree with the way criterion about illegal control by non-state armed groups is written	Revise the proposal of evidence regarding conflict, extortion and relationship with armed groups	Technica l (SC+team)	
217	Questionnaire s record on societal welfare	Asociación Colombiana de Minería	No	Miner	Colombia	Volume 2A	Societal Welfare	Module 4	* 33% Agree with the way criterion about illegal control by non-state armed groups is written * 67% Agree with the way criterion about				

219	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	M.1/5.2.3/R.3	M.1/5.2.3/R.3 Criteria : The AMP engaged with a CRAFT Scheme Does not match with the statement of volume 1 that says "Affiliation of AMPs to CRAFT Schemes is voluntary and optional. In regions where no CRAFT Scheme operates, or if an AMP does not wish to join a CRAFT Scheme operating in its region, AMPs may implement the CRAFT on their own."	M.1/5.2.3/R.3 Criteria : The AMP engaged with a CRAFT Scheme Does not match with the statement of volume 1 that says "Affiliation of AMPs to CRAFT Schemes is voluntary and optional. In regions where no CRAFT Scheme operates, or if an AMP does not wish to join a CRAFT Scheme operating in its region, AMPs may implement the CRAFT on their own."		Change the criterion wording	Technical (SC+team)
220	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	M.5/1.1.1/R.2	M.5/1.1.1/R.2 controlled risk --> we should change worst forms of child labour with child labor	we should change worst forms of child labour with child labor	Proposal to change word	editorial (team)	
221	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	M.3/2.1.8/E.1	M.3/2.1.8/E.1 Formulation of the risk of committing war crimes... Proof of negative is not a good option e.g. I have to prove that I haven't committed a crime is different from I have to prove that I have	Turn the criterion to a positive form	Turn the criterion to a positive form	editorial (team)	
222	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	M.4/2.2.1/E.3	M.4/2.2.1/E.3 The AMP should divulge, or declare to be obliged to divulge, the payments to the national EITI --> explicit : IF THE EITI COLLECTS DATA ON THE ASM SECTOR	explicit : IF THE EITI COLLECTS DATA ON THE ASM SECTOR	explicit : IF THE EITI COLLECTS DATA ON THE ASM SECTOR	editorial (team)	
223	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	M.5/2.1.1/R.1	M.5/2.1.1/R.1 Watch out the deleted word. --> integrated and accepted	Watch out the deleted word. --> integrated and accepted	revise suggestion	editorial (team)	
224	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	M.5/5.2.8/R.2	M.5/5.2.8/R.2 Align the controlled risk with the requirement PROCEDURE + COMPLAINT MECHANISM		revise suggestion	editorial (team)	
225	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	Change the nomenclature	Change the nomenclature M.5/2.2.10/R.1 --> M.5/5.2.10/R.1	Change the nomenclature M.5/2.2.10/R.1 --> M.5/5.2.10/R.1	revise suggestion	editorial (team)	

	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	Module 5	Use of natural resources Operation in coordination with the authorities of the protected areas. --> Be more explicit at this level because in some countries no sampling is authorized in protected areas (e.g. Burkina Faso) Emissions and soil recovery - Avoiding water pollution --> There are no criteria for soil pollution.	Include a criterion on for soil pollution.		revise recommendation for improvement	editorial (team)	
226														
227	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	Module 2		Environment - the water issue is really important. Conflicts between artisanal mining and agriculture (ownership and pollution of land and soils to be taken into account as a criterion of legitimacy). Relation between artisanal mine and industrial mine not to be removed. --> LEGITIMACY (should be explicated)	Explicit Conflicts between artisanal mining and agriculture (ownership and pollution of land and soils to be taken into account as a criterion of legitimacy). Relation between artisanal mine and industrial mine not to be removed. --> LEGITIMACY (should be explicated)	Add another type of conflict	editorial (team)	
228	Team comments	ARM	No	NGO	Colombia	Volume 2A	Vol 2 (all criteria)	Module 4		Criterion security forces: be careful with the "tensions" criterion. Most of the time in context where industrial mines are in relation with ASM, security forces have interests directed towards industrial mines and this criterion could affect AMPs		check the word tensions and type of conflicts	technical (SC+team)	
229	Activity on the CRAFT Report with Miners	Coodmilla	No	Miner	Colombia	Volume 4	CRAFT report	Module 1		Aliviar el documento (peso): pensar en la conexión de lxs minerxs en campo Tabla instituciones / competencias riesgos para enviar. Falta de presencia del estado a resaltar en el documento		Recommendation volume 4	editorial (team)	

230	Activity on the CRAFT Report with Miners	Cooagromin	No	Miner	Colombia	Volume 3	CRAFT report	Module 1		Darle flexibilidad a las preguntas y a los temas que se pueden tocar para permitir que se visibilisen los avances de las minas en temas que no están contemplados en el informe		Good comment for CRAFT report design.	editorial (team)
231	Activity on the CRAFT Report with Miners	ARM	No	NGO	Burkina Faso	Volume 3	CRAFT report	Module 1 Module 3 Module 5		La formulación afirmativa de las preguntas no siempre está alineada con las formulación "negativa de los requisitos (libres de, ausencia de...)". Cuidado que el contexto muchas veces se liga a la realidad colombiana --> ampliar el alcance de las informaciones que se requieren en este documento. cuidado a las preguntas que se hacen sobre orientación sexual y identidad de género. -la lixiviación de cianuro en sedimentos, mineral en bruto o rocas a los que se ha agregado mercurio, sin eliminar primero el mercurio - no veo por qué queremos que las organizaciones mineras ellas mismas consulten: No debería ser algo tipo: autorizamos a que entes exteriores verifiquen ante las autoridades competentes que nuestra organización está libre de estas graves violaciones o algo así?	About Gross human violations: it should not be something like this: we authorize external entities to verify before the competent authorities that our organization is free of these serious violations or something like that? About Cyanide leaching practice: Align the criterion with the Anneof the Minamata convention :Cyanide leaching in sediment, ore or tailings to which mercury has been added without first removing the mercury	Good comment for CRAFT report design.	editorial (team)
232	E-mail comment	SAEMAPE NK.	No	Individual	Burkina Faso	Volume 3	Communication		Ma préoccupation se focalise sur l'aspect lié à l'intervention du craft auODD. comme vous les savez, le domaine MAPE connaît un grand problème du fait la fixation des prises tient pas compte des couts d'exploitation dans l'artisanat minier, raison pour laquelle plusieurs exploitants miniers artisanaudemeurent pauvres, endettés, sans accès a ucédits. quelle plaidoirie prétend CRAFT à mener?	The ASM sector has a major problem because pricing does not take into account the costs of exploitation in artisanal mining: what is the CRAFT Code communicating towards this aspect?	Not change proposed. Comment regarding the other challenges such as pricing.		

233	Questionnaire analysis	ARM	no	NGO	Colombia	Volume 1	Legitimacy	Module 2		Only 29% of participants to questionnaires Agree with the 4 contexts given to consider legitimacy for AMP		Low rate of acceptance of the legitimacy context	Strategic (AG+SC+team)
234	Questionnaire analysis	ARM	no	NGO	Colombia	Volume 1	CRAFT report	Module 1	CRAFT report utility 1- Define priorities for AMP 2- The CRAFT report would mostly serve refiners for "The starting point of your due diligence" they mostly consider the level of importance of the CRAFT report as: "High" 3- The most important item that the CRAFT report must have "Description of the way in which risks are mitigated"			Not change proposed. Interesting to understand the expectations.	
235	Questionnaire analysis	ARM	no	NGO	Colombia	Volume 3	CRAFT scheme	Module 1	CRAFT added value --> The added value of CRAFT for the gold industry "A way to comply with the OECD Due Diligence Guidance and the normative framework on due diligence."			Not change proposed. Interesting to understand the expectations.	
236	Questionnaire analysis	ARM	no	NGO	Colombia	Volume 1	Introduction			82% Agree with the new structure of the CRAFT code		Not change proposed. High level of acceptation of criteria of new structure.	
237	Questionnaire analysis	ARM	no	NGO	Colombia	Volume 3	CRAFT scheme			100% of the market think that the mechanism of assurance of the CRAFT Code is clear		Not change proposed. High level of acceptation of criteria of new structure.	

NOTE: THE COMMENTS THAT WERE REQUESTED TO KEEP ANONYMOUS ARE NOT REFLECTED IN THE CURRENT TABLE. THE CRAFT TEAM REVISE THEM AND THEY ARE INCLUDED AS PART OF THE REVISION PROCESS AND THE SYNOPSIS DOCUMENT OF THE CONSULTATION.

Proposed response of the CRAFT team

Comments beyond agreed intent and approach of the CRAFT (e.g. alignment with OECD DDG, Open Source characteristics, etc.)

Out of scope, not addressed

General comments or questions, general affirmative or dissenting opinions, suggestions on future implementation, etc.

Comments recorded for future CRAFT development; classified according to:

- No change proposed**
- No change required**
- No change recommended by CRAFT team**

Specific comments proposing modifications, identified gaps and errors, suggestions for improvement or clarification

Issues to be addressed for release of version 1; classified according to:

- Strategic topic ... for main discussion at AG level**
- Technical topic ... for main discussion at SC level**
- Editorial topic ... to be addressed by team**

Response level

- editorial (team)**
- technical (SC+team)**
- strategic (AG+SC+team)**