

Dear Fiona,

I would like to suggest the following changes:

Regarding 8.6 "The Mine Site and Mine Site Operator", second paragraph: Maybe one should also acknowledge, that the impacts of a mine site not only go beyond the geographical boundaries but also beyond the production phase of a mine site.

Regarding 9.10 "Implement effective and transparent engagement, communication and independently verified reporting arrangements with mining stakeholders". In my opinion "Provide information that is timely, accurate and relevant" is a basic precondition to gain trust and acceptance among stakeholders and to foster an open and meaningful dialogue. It should not be skipped.

Although I realized that product certification is beyond the scope of the MCEP I nevertheless would like to comment on that issue. The reason is that I got the impression that the working group members think that this would be a lot of work to establish such a system. In fact, there is a relatively simple solution to that problem. The point is that the metals properties do not depend on how the metal was sourced. For other materials, such as food, this is not true. Organic food has properties other than conventional food. Therefore, a credible tracking system is required. But as I said, aluminum is aluminum regardless of how it has been extracted and processed. Therefore, it is sufficient to make sure that a company does not sell more certified metal than it really produced or bought from other companies. Whether or not a specific amount of metal is certified does not matter as long as a company fulfills the above request. This idea might sound strange to you but it works. In Switzerland, customers can choose whether they want to buy the conventional energy mix or energy from renewable sources. Obviously companies providing energy from renewable sources cannot build a separate grid and I do not have special plug for renewable energy in my flat. But as electricity from renewable sources looks exactly the same as energy from conventional sources I and all the other customers do not care. But by paying a premium for renewable energy customers make sure that that amount of energy from renewable sources gets produced and generates all the ecological benefits that come along with it and substitutes the same amount of energy produced from conventional sources. With regard to metals it would be exactly the same.

Best regards,
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