



31 December 2019

Dr Bruno Oberle
Chair
Global Tailings Review (GTR)
International Council on Mining and Metals (ICMM), the United Nations Environment
Programme (UNEP) and the Principles for Responsible Investment (PRI)

Dear Dr Oberle

Re: Letter supporting the submission from the Corporate Human Rights Benchmark (CHRB)

The Institute for Human Rights and Business (IHRB) greatly supports the work of your review process. I valued the opportunity of meeting you several months ago to input our thinking verbally. We are very pleased to see that human rights are integrated into the draft GTR Standard. All of IHRB's points of feedback are aligned with those already submitted by the Corporate Human Rights Benchmark (CHRB), an initiative we helped establish several years ago. Mining has been one of the first focal areas of CHRB. In addition to this, IHRB has developed and implemented Sector-Wide Impact Assessments on mining in Myanmar and Colombia, which has helped us understand how best to align a human rights approach and criteria within a wider ESG framework.

I echo a few of the key points from the CHRB submission here:

- The human rights due diligence process is valued by the United Nations and many other international bodies for including key aspects of prevention, mitigation, remedy and leverage relating to the potential and actual adverse impacts of business activity.
- The need to place the interests of vulnerable groups central to the analysis, and this includes whistle-blowers and human rights defenders whose voices can often be side-lined or silenced by powerful interests.
- A zero tolerance approaches to fatalities and other aspects of severe human harm is essential.
- There are a number of areas that would benefit from further clarification, including: scope, accountability, risk transfer and implementation.

We wish you success as you finalize the Standard and roll it out for widescale implementation. IHRB is ready to assist in whatever way we can moving forward.

Best regards

John Morrison
CEO

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