Roundtable on the Responsible Recycling of Metals (RRRM) Non-Ferrous Working Group (NFWG) Meeting 5: Due Diligence – Monitoring, Reporting and Bringing it Together

Meeting agenda and objectives: **Nov 14th, 2023**

1. Introduction and review of outcomes from last meeting/matters arising
2. Presentation by GIZ Ghana – formalizing of scrap yards
3. Reminder of where we are in the process
4. Breakout objectives and framing
5. Breakout groups
6. Plenary debrief
7. Recommendations and route map
8. Next steps

Outcomes and Discussions

- Raldwin Asiedu gave a presentation on the German Development Cooperation (GIZ)'s E-Waste Program that is being implemented in Ghana at a number of locations in Accra and in other cities. Currently, input and output of material streams of the assessed scrap yards in Ghana are not collated, and detailed data on the collected scrap is dismantled or recycled is not fully known.

- GIZ Ghana has created a toolbox which is a collection of methodological approaches to support informal scrap dealers' associations in formalizing their businesses; transforming informal scrap yards into permitted collection centers with permitted dismantling (recycling centers); and improving organizational and operational setups (including business models).

- The main tools in the toolbox are "Stakeholder Mapping", "Baseline Assessment", "Visioning", "Input/Output Assessment", "Operator Models", "Permitting Requirements", "Material Flow Model", "Layouting", and "Infrastructural Modeling". Depending on the needs of different sites, different approaches and tools are used.

- Raldwin summarized each tool, for example, how they use the stakeholder mapping to ensure that all stakeholders are included in the discussion and changes that will be made to the scrap yard. After discussion with all the stakeholders, they create a vision board to include expectations and requirements to environmentally sound e-waste management from all stakeholders. This includes categories ranging from environment and health to socio-cultural to infrastructure at the sites.

- Three breakout groups discussed scenarios focused on the most important leading and lagging indicators to monitor, what should be reported publicly, and what qualitative information should be reported to demonstrate ESG improvements through three different lenses. The first group was a tier one manufacturer with a brand requesting enhanced due diligence for scrap metal inputs. The second group was a smelting/refining company sourcing post-consumer scrap from both developed markets and others. The third group was a brand collaborating with the local government and an NGO, with a project similar to the GIZ Formalizing Scrap Yard Project. Breakout groups reconvened to present their discussions.

- The first breakout group indicated that percentage of pre or post-consumer scrap, origin, KYC information, ISRI grade (which doesn't include source but does provide pre/post-consumer), confirmation that the material is actually recycled, percentage of suppliers that have policies and management systems (such as health and safety) were important. Regarding origin of scrap, it was noted that some third-party tools including the Verisk Maplecroft tool scores countries related to their waste management practices, which could helpfully feed into country risk profiling for scrap.

- LME's noted that it would like an industry standard that is widely accepted, and an auditable methodology for recycled content that allows smelters to report their percentage of recycled content on a regular basis. It noted that even tracking and reporting on this basic indicator is not common practice.

- The second breakout group indicated that having a supplier assessment system in place is fundamental. While stakeholder engagement and representation of vulnerable groups is critical, it was stated that the most vulnerable groups may not be that able to discuss important issues so legitimate representation should be sought. The role of smelters was deemed as important as their

product is equivalent to primary materials, so their customer will define what are allowable behaviors. The group noted that reporting transparently on Supplier Code of Conduct Policies that have provisions for recycled inputs and clear and precise lifecycle assessment related indicators, scrap recycled input, and anonymized grievance related indicators such as impact and remediations is important.

- The third breakout group considered indicators split by module aligned to the GIZ Ghana project that cover the key areas of the toolbox. These included the training module – H&S, record keeping, business management; Mobile Training module - numbers trained; Permitting module - getting land title documentation and blueprint for site plan and permitting permissions for work sheds; infrastructure module looked at things like ensuring roofing and impermeable flooring for work areas; and the Policy module – advice that connects with agencies/municipality and the government. As there are few companies that are engaged in projects, there was more knowledge about corporate approaches, including training of procurement teams, numbers of supplier assessed, inputs into risk assessment. It was noted that not a lot of information is typically reported.

- It was noted that stakeholder engagement is key in understanding risks and gaps in regulations within companies. Ensuring vulnerable voices have a seat at the table is critical to addressing these challenges. This includes bringing in civil society, workers labor unions, and having an easily accessible grievance mechanism.

- Discussions surrounding the assurance of the information we receive from third parties was noted. Though companies can ask all the right questions, there are no guarantees that the answers they provide are honest and accurate.

Attendees

1. Raldwin Richard Asiedu, Technical Advisor, GIZ Ghana
2. Murat Bayram, Director and Head of European Non-Ferrous, European Metal Recycling (EMR)
3. Steve Binks, Regulatory Affairs Director, International Lead Association (ILA)
4. Kristi Disney Bruckner, Law & Policy Director, Initiative for Responsible Mining Assurance (IRMA)
5. Ahilyn Campos, Value Chain Frameworks Specialist, Freeport McMoRan
6. Marcel Christians, Director of Innovation & Sustainability, Weiland
7. Nicole Hanson, Head of Responsible Business, London Metal Exchange (LME)
8. Yosuke Isoda, Assistant General Manager Sustainability Dept, Mitsubishi Materials Corporation
9. Sophie Kellerman, Sustainability Manager Zinc-Copper Dept, Glencore
10. Yanin Kiefer, ESG Coordinator, Boliden
11. Aysha Lotter, Legal Consultant and Doctoral Researcher, University of Cape Town
12. Sei Nakai, Assistant General Manager Sustainability Dept, Mitsubishi Materials Corporation
13. Bethany Perkins, Sustainable Development Analyst, International Copper Association (ICA)
14. Jessica Sanderson, Director of Sustainability and ESG, Copper Development Association (CDA)
15. Ilse Schoeters, Director Product Stewardship Nickel & Cobalt, Glencore
16. Sebastian Vetter, Responsible Sourcing Manager, Aurubis
17. Dea Wehrli, Empa Swiss Research Institution
18. Matthew [?], Glencore USA
19. Dave Knight, RRRM Facilitator, One Planet (NFWG Co-Lead)
20. Umut Cantoru, RRRM Secretariat, New Horizons
21. Mark Prins, RRRM Secretariat, Freelance Sustainability Consultant