

PPA Data for Impact Symposium

Discussion on Bloom by IMPACT with Joanne Lebert and Gerard van der Berg

Attendee 1: I'm curious about the extent to which you've explored looking at governance dynamics through the tool, particularly around capturing issues of corruption, recognizing there are sensitivities.

Joanne: We already have a number of standards and social impact metrics which are globally validated and recognized integrated into the Bloom by IMPACT library, but we don't have one that's specific to corruption. While we could introduce it eventually, the standards that exist in the library already, many of them already reference the kind of criteria you would use to ascertain the level of corruption. Bloom by IMPACT provides a framework to go out and collect the data to be able to compare against national benchmarks and international criteria across contexts and commodities.

The sensitivity around collecting the data, Bloom by IMPACT doesn't do away with. That will depend on a context-by-context basis. And it will depend on the skill of your data collection teams who understand the context. That doesn't come in a framework. However, those are the type of elements that can be brought into capacity building and training programs and support of local teams to collect that information.

Gerard: The landscape of indexes the data landscape, there are about 163 globally recognized ones. From a governance perspective, we've been specifically looking at the Environmental Governance Index, which speaks to a lot of these kind of issues. We haven't added it yet. There are quite a few indexes that our candidates asked to be added, but there are a lot more already. And there are other indexes that also have elements that speak to corruption and government related issues. It's really a matter of a preference. We're really looking at those particular sets of indexes or areas. From our experience, if you're interested in something, there is an index. They are well tested which is which is the beauty of it.

It also speaks to the fact that there is so much knowledge out there to be incorporated and used. There's no need to reinvent the wheel. And that's the whole purpose of this exercise. The Environmental Governance Index, as a reference, is one that would be of particular interest. I think for you, it speaks to it very well and can fairly easily be localized.

Joanne: Yeah. And these are the ones that are in there now. One is resource governance, so NRGi's Index. Environment Performance, which is Yale's Social Protection which is the Asian Development Bank, Oxford's Global Multi-Dimensional Poverty Index, and the Women, Peace, and Security Index at Georgetown. We've also looked at possibly integrating the child labor common indicator framework developed by ILO, the Financial Inclusion Index, the World Bank and the Poverty Probability Index.

But we also have to liaise with them to get their permission, and get clarity as to the usage legally. So that's the kind of due diligence we have to do before including them in the system. But we could include others, like the corruption perception index, climate smart index, etc. So, I think, how many? 160 indexes?

Gerard: 163.

Joanne: Yeah. And as you pick your priorities, and you generate your protocol, wherever there is duplication essentially it is consolidated. You're not going to get multiple questions. You're just going to get one that will essentially hit all the right notes across those indexes, so you're not overwhelmed by it.

The other thing to add about that is on the standard side, the possibility of integrating. We have the ICGLR Regional Certification Mechanism, the OECD due diligence guidance, and CRAFT as a starting point. But we've been asked about potentially integrating IRMA, the LBMA, responsible gold guidance, and we also see huge potential with the ASM cobalt framework that we're involved in helping to develop.

So essentially integrating and adopting those in order for them to speak across these standards and across these indexes is to everybody's benefit. That's what we're aiming to do. Last week we were speaking to the EU about the possibility of including due diligence regulations as well as an additional common indicator framework so that users can measure against the regulatory and legal compliance needs for European based companies.

Gerard: If you love the idea of adding in the due diligence legislation, I think that it would be really valuable for at least downstream companies as we try to develop our frameworks and implement actions to meet the requirements that are laid out in the legislation. But what do you think that timing would look like?

Joanne: We are at a prototype stage, I should be clear about that. To build this whole thing out would probably take about eight months for it to be operationalizable. But in discussion with the EU they're looking at about a year by the time the legislation gets adopted. The integration of the regulations into this framework will depend at what point they are in the development of their own framework. Whether we have to start from scratch with them to develop a theory of change and identify the indicators or whether the indicators are already there and we integrate them will determine how much time it will take to integrate into the system.

Attendee 2: When we're talking from a regulatory standpoint, from an interoperability standpoint, what level of review of that being able to unselect components of the OECD due diligence— because I think, realistically, to have the ASM feed into existing systems, if there are components of OECD due diligence that weren't assessed, it might prove difficult after the fact. Apologies if that wasn't clear. Is there an option or potential consideration of not unchecking aspects of the OECD due diligence structure?

Gerard: The OECD due diligence framework does not apply to all levels of actors in the supply chain the same way. For instance, the audit feature, which is step five, doesn't actually apply to local cooperatives. So you have to be able to tailor certain things that don't apply to you as a requirement. It's between the actors, and it's fighting them to agree to make sure that they report to each other, so to speak, with all the information that is there and is required. Locking it in would be an actor-specific level, which is tricky. Which is why it is the way it is done. And if you actually click on it, the basic requirements cannot be unclear, but it's actually where there comes a selection and applicability in play.

Attendee 2: I guess I misunderstood. I thought that this was the requirements that were being input specifically for those ASM operations.

Gerard: No, the system, actually, when you start and maybe I can share a screen to show you all then. OK, so when you actually go to 'Framework' and you're creating a framework, when you go to 'Mining,' the first question you have to ask is: are you applying it to large-scale mining or just small-scale mining? Or do you apply these rules to both, because certain things can be applied to both. So basically, as you do you

just look at ASM, we also look at LSM and the combination thereof. As a result, it's a little bit more flexible than maybe what was indicated.

Attendee 2: I missed that piece of it. Thank you for that.

Gerard: The video was very limited. And it takes time but actually when you do that, we're looking at integrating agriculture as well. It really is those initial questions that are key to look at when you start looking at doing either one or the other. But you are certainly right. There's a certain level if you lock in right to a compliance standard, and that issue needs to be sorted out between the supply chain actors. If you want to report out on the proper set of information and the proper component, that's the standard itself, then you have to include and make sure that all the pieces are included that are applicable to your level of operations.

Joanne: Gerard, do you want to show maybe the common indicator framework?

Gerard: Yeah. The difference between an index and a common indicator framework, especially when it comes to things like the women's economic empowerment, some people call it the junior index or common indicator framework or index proper, and we kind of draw a line somewhere on indexes, that have been academically— or are validated and internationally supported and recognized. When it comes to common indicator frameworks, there's a fair number of them around that have been around for years. Like I said, with the women's economic empowerment one started by USAID and the agricultural sector and has grown, and it's got a bit of a following and is actually quite global, but not very big here.

It's still morphing in its existence. We have adapted it for ASM and, even then, there is a lot of testing. Things will change on that over time. Indexes are kind of fixed from common integrated frameworks, and that get adapted as time goes on. We currently have those that we see as common indicator frameworks that we've actually focused on to assist them to do the due diligence guidance. We have the OECD one, the women's economic empowerment one. The formalization one started by the UN group and then the labor one, which is also still undergoing quite a bit of work. And then there is a third group where we're actually looking from a library perspective where we're more open to member contributions.

But there's a lot of work actually going on around work areas. And there are the loose indicators that have really been proven valid with a high, high validity. But we want to make sure it gets promoted and people have access to them. So those are really contributors in more of a crowdsourcing way, so to speak, of best practices around indicators. So those three groups are common currently. These are the ones we're working with as you outlined as well. I don't know if people have specific requests or not of the other ones that say, "Hey, we've been working with X, Y or Z, and that would be really valuable to include." We're all ears.

Joanne: And maybe one other thing that I glossed over in terms of these indexes— if you look at, for example, the Women Peace and Security Index, which I know very well because of my professional background, where Georgetown puts out every year or two a scorecard of where countries are ranking in terms of their women, peace and security, statuses. You'll find that Sweden is like number two. And, typically, Congo is lower end. Those are the type of global indexes that are created by these institutes that they benchmark at the national level. So what we've done is we've taken those and localized them and have been testing them in artisanal mining and mining sector communities now for five, six years.

That allows the data that's collected locally to be compared against the national benchmark. And you can actually produce a scorecard comparing your local context in your supply chain versus the national

scorecard that comes out every couple of years and compared to the international level. So this, again, is the idea of being able to speak apples-to-apples versus creating a big fruit salad of really rich data that we can't decipher. That's why we've relied on these as well, because they have that national benchmarking and international recognition.

Gerard: There are some basic screens you can either go through, or there's also a way that you can say, "Hey, this is what we want to focus on as an organization or as a company. And then here are those kinds of goals that are, again, very, very relevant for us to do." So that's another way to get out metrics. It's an alternative way get at that same piece in terms of what you're trying to do and try to build your metric frameworks.

Bloom by IMPACT is an impact monitoring system which allows stakeholders to have evidence supply chains are free from risks and report on progress against the Sustainable Development Goals (SDGs) and Environmental, Social and Corporate Governance targets. This monitoring and evaluation tool empowers users to understand how their supply chain affects communities. With Bloom, users can learn how they are positively contributing to local benefits, identify opportunities for improved practices, and leverage data to seed change.



Joanne Lebert is the Director at IMPACT. She has focused on contributing to responsibly-sourced, conflict-free minerals and examining how the extractive industry affects gender-based violence in conflict setting in Africa. She has worked with Central African governments to launch and implement a regional strategy to tackle conflict minerals, and has served as a policy advisor, frequent guest speaker, and trainer to policymakers, private sector representatives, and civil society organizations.



Gerard van der Berg enhances IMPACT's systems to improve natural resource governance and ensure sustainability of projects through the development of monitoring and evaluation systems. He also frequently liaises with the private sector to explore and develop new models of financing to create sustainable and commercially-viable responsible supply chains. Gerard has over 30 years of experience in international development and has been recognized by the Smithsonian Institution.
