



## THEORY OF CHANGE

### TOWARDS SUSTAINABLE MINING (TSM)

#### About TSM

TSM is a globally recognized sustainability program that supports mining companies in managing key environmental and social risks while meeting society's needs for minerals, metals, and energy products. Established nearly twenty years ago, TSM was the first responsible mining standard in the world to require site-level assessments with external verification.

Through TSM, mine sites develop robust sustainability management systems and report annually on key indicators of performance in areas like climate change, Indigenous and community relationships, and biodiversity conservation management. Qualified external verifiers review and confirm these results every three years.

TSM is primarily adopted and implemented by national mining associations. These associations, in turn, require their members to implement the program—leading to rapid and widespread uptake of TSM in each jurisdiction. Over 200 mining companies are currently implementing the program through TSM partner associations in Argentina, Australia, Botswana, Brazil, Canada, Colombia, Guatemala, Finland, Norway, Philippines, and Spain.

TSM is overseen by a national, multi-interest advisory body, called Community-of-Interest Panel, in each implementing jurisdiction. These groups ensure that the mining industry sets ambitious and credible standards for sustainability performance that reflect diverse stakeholder and rights holder expectations in unique national and cultural contexts.

Learn more about TSM [here](#).

At its core, TSM aims to raise responsible mining standards around the world, recognizing that companies will always be working *towards* sustainable mining. The program therefore seeks to drive continual improvement in site-level sustainability performance.

Most TSM performance indicators use a five-level rating system—Level C (no systems in place), Level B (some systems in place), Level A (good practice), Level AA (integrated systems), and Level AAA (excellence and leadership). Each year, mine sites must demonstrate improvement towards a minimum Level A rating on all TSM indicators.

TSM also sets objectives for improvements to the TSM program based on industry performance. A high proportion of facilities reporting Level AA or higher across most indicators of a protocol can trigger a comprehensive review of the protocol's requirements to set a higher bar for performance.



## **Strategies for Change**

TSM employs a series of strategies to support this vision, including:

### *Multi-Stakeholder Engagement*

In each jurisdiction where TSM is implemented, the program is overseen by an independent, multi-interest body, called a Community-of-Interest Panel— typically these are between ten and fifteen national representatives from a cross-section of stakeholders and rights holders including Indigenous groups, local communities, environmental non-governmental organizations, labour unions, finance and others with an interest in improving the sustainability performance of their national mining industry. The advisory body serves as a platform for deep dialogue and consensus-building on sustainability issues of concern for diverse stakeholders and industry representatives. These bodies have a strong track record of driving culture change within national mining industries, establishing processes for regular engagement and collaboration with a diverse set of individuals from national stakeholder and rights holder groups—including those with critical or opposing views. Each national body prioritizes different issues, adapting and revising TSM requirements, policies, or practices to ensure the program’s credibility in each jurisdiction and. To ensure that it respects relevant cultural contexts. An example of this is that the Mining Association of Canada was able to work with the Indigenous representatives on its COI Panel to embed relevant calls-to-action from Canada’s Truth and Reconciliation process.

National advisory bodies also play an important role in the TSM assurance process. Each year, these bodies engage a subset of companies for an in-depth review of sustainability practices and performance, including constructive dialogue about companies’ successes, challenges, and areas for improvement. TSM also seeks public comments during the development or review of all TSM protocols and policies, allowing a wide range of stakeholders to inform the continual improvement of the program.

See an example of a national advisory body [here](#).

### *Continual Improvement*

TSM protocols are important tools that help mine site practitioners develop management systems for key sustainability objectives. Each protocol includes a set of performance indicators with detailed criteria at five levels of performance. These criteria offer companies a benchmark for their existing systems and a step-by-step guide to improve their performance—from Level C to Level AAA. The protocols are accompanied by guidance and links to expert resources to support interpretation and implementation of the performance criteria.

TSM partner associations support the implementation of these protocols through comprehensive training to help companies improve their TSM performance over time. The ethos of continual improvement is also applied to TSM as a whole—minor revisions of TSM protocols are scheduled each year, with the possibility of comprehensive protocol reviews in response to significant changes in stakeholder expectations or regulatory requirements. Regular reviews of TSM protocols and policies ensure that TSM performance criteria and program management practices are in a process of continual evolution to reflect changing expectations and obligations.



All TSM protocols are available to download [here](#).

### *Driving Change Across the Industry*

When TSM is adopted by a national association of chamber, it is a requirement that the adopting association or chamber establish TSM as a condition of membership. The memberships of TSM adopting associations and chambers are collectively committing to change and continuous improvement. The members are collectively committing to collaborating between themselves and with national stakeholders and rights holders to define what good practice and leadership look like on environmental and social issues, to measure and track progress to meeting that good practice and leadership and to have those results independently verified. This collective commitment to action results in change and improvement across a national industry rather than a more fragmented approach of having individual companies and facilities decide on what tools they are going to use to drive performance.

### *Credible Performance Reporting*

Each year, mine sites report their performance scores against each of TSM indicators on the five-point scale described above. Every three years, qualified external verifiers review and confirm these results, publishing a summary of their findings. Site-level annual public reporting and external verification of TSM performance is central to the TSM approach, offering transparency and accountability to stakeholders regarding the sustainability performance of specific mine sites.

Find more information on the TSM reporting and assurance process [here](#).

### **Conclusion**

Together, these strategies drive continual improvement in site-level sustainability performance. The multi-level rating system for measuring and reporting on performance serves as an incentive for companies to take regular steps to improve their performance from good practice (Level A) to excellence (Level AAA) on each performance indicator. Using the TSM protocols, companies can benchmark their performance and set targets for sustainability issues that are often difficult to quantify—like effective community engagement or climate change adaptation planning. At the same time, the broader picture of industry-level TSM reporting data allows national mining associations and their stakeholders to monitor trends over time, identify gaps in performance, and intervene when performance improvements are stagnating.