

CASE STUDY

2021



Product Social Impact
Assessment of ASM (artisanal
small-scale mined) gold in Peru

RICHEMONT



Product Social Impact Assessment of ASM (artisanal small-scale mined) gold in Peru

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This case study has been developed as part of Richemont's membership of the Social Value Initiative. It has been authored by Nicolas A. Eslava (Afai Consulting) and Nathalie Hürlimann (Richemont). June 2022.

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Literature reference

Hürlimann, N.; Eslava, N.A.; Richemont- Product Social Impact Assessment of artisanal small-scale mined gold in Peru, version 1.0, Amersfoort, June 2022.

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Acronyms

ASM	Artisanal and small-scale mining
BGF	Better Gold Fund
LCA	(Environmental) Life-cycle assessment
LSM	Large-scale mining
OHS	Occupational health and safety
RJC CoP	Responsible Jewellery Council Code of Practices
SBGA	Swiss Better Gold Association
SBGI	Swiss Better Gold Initiative
SSM	Small-scale mining





1 Introduction

[Richemont](#), founded in 1988, is one of the world's leading luxury goods groups.

Our unique portfolio includes prestigious Maisons distinguished by their craftsmanship and creativity. Gold is an important raw material in our watches and jewellery manufacturing activity. As part of our commitment to amplify our social handprint, we want to be able to measure our social impact. In the current paper, we summarise the social impact assessment of SOTRAMI, a small-scale mining (SSM) operation located in Peru and compare it to the local ASM sector.

This case study is a summary of an internal report. It follows all the stages described in the Product Social Impact Assessment (PSIA) Handbook from materiality, goal and scope, hotspot assessment and the full PSIA.

1.1 Background

The *Sociedad de Trabajadores Mineros S.A* (SOTRAMI) is a Peruvian small-scale mining (SSM) operation that has been an active participant in the Swiss Better Gold Initiative (SBGI), a technical and financial support programme that seeks to bring artisanal-small-scale mine (ASM) operators in line with best international practices and, at the highest level of performance, aims to achieve certification under the globally recognised Responsible Jewellery Council (RJC) Code of Practices (COP) standard. SBGI is funded by the Swiss Better Gold Association (SBGA); Richemont and Cartier, one of Richemont's Maisons, are members and founders of the SBGA.

SOTRAMI is owned by 165 shareholders, of which virtually all of them previously worked or are currently working as part of the SOTRAMI staff; most of them have worked as miners for SOTRAMI at some point, which according to them explains why community issues and working conditions are so embedded in SOTRAMI's efforts. SOTRAMI operates an underground hard-rock mine and mineral is processed in a cyanidation plant located on its title. SOTRAMI's workers mine the majority of the ore processed on site in two deep underground shafts; this feed is complemented by the production of small independent mining teams known as *sociedades* that operate on the mining title in their own, shallower, shafts under the supervision of SOTRAMI as well as the production of female mineral hand-pickers known as *seleccionadoras* working on the mine's overburden material, also under the supervision of SOTRAMI. Notably, thanks to the support of SBGI, SOTRAMI has achieved compliance with the International Cyanide Management Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold (ICMI). The bulk of SOTRAMI's production is certified under the RJC COP and consequentially receives the SBGI premium of 1,000 USD/kg. The remainder of its production is certified under the Fairtrade Gold modality. SOTRAMI's buyer for its RJC COP certified production is Cartier.

Santa Filomena, the town nestled against SOTRAMI, is a community that emerged due to mining activities. Roughly 4,400 people lived in Santa Filomena at the time of the fieldwork, of which all of the working adults either directly work in mining or in one of the few local businesses, all of whom are dependent on local mining operations, including the operations of SOTRAMI. Given its close proximity to the town, SOTRAMI's title is fenced, and access points are controlled by its perimeter security. SOTRAMI has also ensured that the road used to move mineral loads does not run through the town; this has led SOTRAMI to build a road extension for the exclusive use of residents of Santa Filomena.

As noted, Cartier currently purchases SOTRAMI's gold at a premium; 70% of said premium is deposited into a dedicated Better Gold Fund (BGF) that is used to fund local development projects directed at the mining operations and the surrounding local communities. These projects are then funded at 50% by the BGF and at 50% by the operators. Among SOTRAMI's recent projects, the company is keen to showcase its most important project to date: the extension of their piped water infrastructure. A key investment of SOTRAMI that, at a cost of more than 1 million EUR, not only drastically reduced its ongoing water transport costs but also cut its CO2 emissions. Other projects have targeted workers, local suppliers, and community members alike, always in consultation with the aforementioned stakeholders.



SOTRAMI's mining operations are located in the Sur Medio Region, in the Santa Filomena community (Sancos District, Lucanas Province, Ayacucho Department), a few minutes away from the border with the Caravelí Province of Arequipa Department. While this region possesses a strong history of ASM gold, the regional ASM sector is characterised by substantial informality and lack of secure tenure of rights for the majority of the ASM operators, which has disincentivised said operators to invest in better mining practices. Coupled with an overall lack of State agency presence in the region¹, this has led to the proliferation of practices falling short of national requirements, let alone of recognised international best practices and benchmarks.



Image 1 - Natural landscapes in Santa Filomena

SOTRAMI is located in Peru's coastal desert, a biome characterised by extreme aridity and the virtual absence of vegetation, with the exception of very focalised points, and limited biodiversity. This has impacted local demographics and settlement patterns and as a result, most of the mining takes place in areas where no prior settlement exists, thus decreasing competition for the access to resources, limiting the impacts on cultural and archaeological sites and artifacts as well as on biodiversity or forest and limiting the need for relocation and resettlement. However, this absence of water has also created issues for miners and local traders have been noted to take advantage of the situation to force exploitative commercial terms on the ASM miners that source water from them.

1.2 Goal

Under the overall goal of gaining additional insights into its raw material supply chains, this study was conducted with the following specific objectives in mind:

- Evaluate the impacts of SOTRAMI, a small-scale mining (SSM) operation that supplies Richemont with gold;
- Complement an environmental life-cycle assessment (LCA) on ASM to have a holistic view of environmental and social impacts generated by ASM mines;
- As the operator is a part of the [Swiss Better Gold \(SBG\) Initiative](#), to evaluate whether the support of the SBG has contributed to measurable positive impact;
- Evaluate whether ASM operations can satisfy the sourcing requirements of Richemont;
- Test whether a PSIA-based approach generates the data needed for decision making on issues related to the sourcing of raw materials;
- Test whether the in-house operationalisation of the PSIA methodology and its deployment in mineral supply chains as well as the tools developed to that effect are fit for purpose.

¹ Not only are both Lucanas and Caravelí located from 8 to 12h + away from the seat of the competent authorities, but these entities are also, as a rule, greatly understaffed. For example, Ayacucho's regional mining and energy directorate (*Dirección Regional de Energía y Minas – DREM*) was staffed by only 7 staff in 2021, and was in charge to oversee a department that is slightly larger than Switzerland or the Netherlands.



1.3 Scope

The scope of the PSIA covered the supply chain of gold at the level of the gold mine. This includes the following processes: ore extraction, on-site transport and storage, and on-site processing into doré.

Stakeholders addressed	life-cycle stages				
	Supply chain Raw material extraction, manufacturing, retail		Use	End of life	
	Small-scale entrepreneurs	Workers	Users	Small-scale entrepreneurs	Workers
	Local communities				

Table 1 Stakeholders groups and Life-cycle stages included in PSIA

This scope requires an evaluation of the impacts at the level of the *workers*, *local communities*, and *small-scale entrepreneurs*; in line with the PSIA Handbook. Users are excluded from our scope. More specifically, at the stakeholder level:

- Both direct employees and sub-contractors were considered as workers under the scope of the assessment;
- Communities located on the mining title and adjacent to the mine infrastructure (roads and water pipelines) were considered as falling into scope of the assessment;
- Local suppliers of goods necessary for mining were not included. There are however community members that work independently on the mining title under the supervision of the mining operator, who sell all of their production to the operator. These local entrepreneurs are considered to be in scope for the assessment.



2 Methodological approach

2.1 Selection of material topics

Considering the depth and the variety of impacts mining operations can have on their stakeholders, all social topics are applicable to the identified stakeholder categories.

In addition to the social topics that are part of the generic PSIA methodology, the deployment of a PSIA approach on a mining operation requires the collection of additional data to ensure alignment with the requirements of key guidance that evaluate risk mitigation in the mining sector, namely those risks featured in Annex II of the 2016 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (V3) and the 2012 IFC Performance Standards on Environmental and Social Sustainability. The approach for achieving alignment with the requirements stemming from these data collection standards is twofold.

- First, whenever possible the requirements are integrated into the corresponding social topics of the PSIA. For example, the requirements of the OECD Guidance and IFC Performance Standards on the prevention of forced labour can be integrated into social topic 1.4.
- Second, certain requirements required a new category as their impacts are not felt at a specific stakeholder level. These requirements are mostly dependent on the existence of risk identification, prevention and mitigation at the level of the operator and have a profound effect on all stakeholder categories and society at large, thus often looking at issues that are generally the focus of due diligence approaches and requirements. These requirements have been grouped into the category “Additional indicators”.

2.2. Methodology development

To support the execution of a PSIA, a series of tools were developed in line with the Handbook for Product Social Impact Assessment (version 5.0, 2020) and the Product Social Impact Assessment- Social Topics Report (2020) to ensure that:

- The necessary information is collected in a way that is systematic yet adaptable to the different scales of mining operations, from small ASM operations to multi-billion LSM mines. While doing so, consulted operators are subjected to a minimally invasive data collection approach.
- Relevant policies are identified, collected, and evaluated.
- Information from a multiplicity of stakeholders is collected and gradually consolidated and structured to ensure that no relevant information is missed and ignored during the analysis.
- The data collected is evaluated against sector-specific performance benchmarks.
- Benchmark and compliance levels were developed based on a systematic approach to the setting up of social topics performance indicators and scale (based on the PSIA Handbook version 5.0, 2020) and Social Topics Report (version 1.0, 2020), whose objectives were then aligned where necessary with corresponding requirements from the OECD Guidance and IFC Performance Standards.
- Data is collected across 25+ social topics and is displayed in a simple and intelligible format that also allows for comparison with sector conditions, including the development of reporting templates and custom-design visual aids.
 - o For example, the visual aid presented in *Diagram 1*, to the right, portrays results at the stakeholder level (see section *Stakeholder specific PSIA results*) using both area and a colourblind-safe colour scheme for clarity and impact.

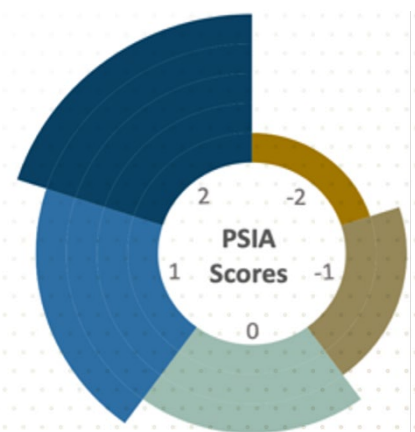


Diagram 1 – Visual aide for stakeholder-specific scores



2.3 Full PSIA assessment

2.3.1 Hotspot identification

SOTRAMI's selection for the deployment of a PSIA was independent from the PSIA methodology. The gold extraction stage was identified internally as a key sourcing concern justifying the deployment of an environmental LCA and a PSIA to answer the questions listed in the objectives in section 1.2 (Goal) .

2.3.2 Pre-field data collection

In preparation for the primary field-based data collection, information was collected on the mine and the ASM sector in the region of the mine's operation. This data was collected through secondary sources (see the *References* section) that included: publicly accessible databases, NGO reports, media reports, and seven key expert interviews.

A kick-off meeting was conducted with the management of the mine to explain the reach and the objectives of the PSIA and the use of a tool designed to identify PSIA-applicable company policies. Following the usage of this tool, the relevant policies of the operator were received and analysed.

This pre-field data collection led to an initial understanding of the sector and of the local conditions, which allowed for the field information collection to be tailored and the development of a baseline for the sector, using the same evaluation benchmarks as the operator.

2.3.3 Field data collection

Data was collected through face-to-face interactions with management representatives, workers and worker representatives, community members, and local suppliers.

During the field visit, additional policies and records of the operator were consulted and mining sites, industrial compounds, and living spaces were visited and documented.

2.3.4 Analysis

Once collected, the primary and secondary data was gradually consolidated and analysed. The social topic performance was evaluated using the tools developed to that effect.

During this process, the collected data was contextualised using the sector baseline and when relevant, compared to said baseline to provide the required analysis that satisfies the stated goals of the PSIA.

2.3.5 Feedback integration

Results of the PSIA were presented to Richemont and SOTRAMI mine stakeholders to create a space for discussion and eventual comments and corrections. The PSIA results were finalised following this discussion.

The tools specifically developed for the PSIA were also updated after their deployment to rectify any issues that had been observed during their use in the field.



3 Results

3.1 Overview of results

In *Diagram 2* the performance of SOTRAMI is compared with the general performance of ASM gold mining in the Sur Medio Region. SOTRAMI shows exceptional performance, thus rewarding the substantial efforts made in bringing best practices to a sector characterised by short-termism and a lack of good practices.

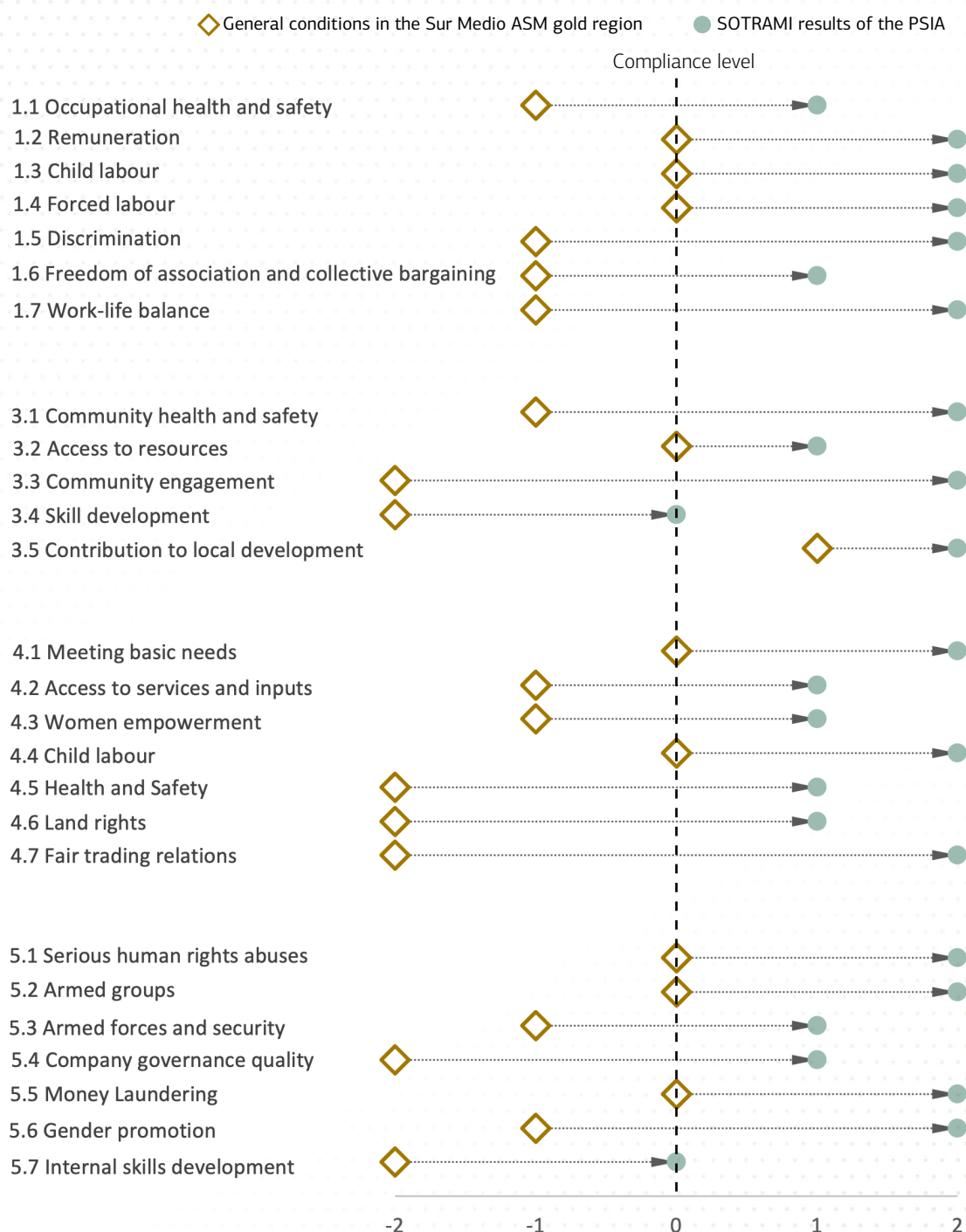


Diagram 2 – Comparison of results of SOTRAMI with the general conditions in the ASM gold region of Sur Medio (also the compliance level is shown)



3.2 Stakeholder specific PSIA results

3.2.1 Workers

While local employment is an objective of SOTRAMI, its workers come from across Peru as this helps SOTRAMI to receive new expertise from miners who were previously employed in other mines.

SOTRAMI's prioritisation of its workers is depicted by the high scores received, as illustrated by *Diagram 3*. This performance is particularly notable given the sector's overall performance (see *Diagram 4*).

Workers under the scope of the PSIA include both staff workers contracted directly by SOTRAMI, ongoing contractors² and punctual contractors³. A key point in SOTRAMI's approach with its workers is the embedded principle of risk identification and mitigation.

According to management, workers are the key stakeholders of SOTRAMI, particularly underground miners who are always considered as first in line to receive benefits given the harsh nature of their work. This focus is reflected in the comments made by all categories of workers that put forward good working and living conditions despite the difficult nature of the work. No negative comments were received from the consulted workers. The observed accommodations were spacious enough, clean, and private, with the most modern accommodations destined for underground workers. Simultaneously to the field visit, work was underway to upgrade the accommodations for female workers by the end of the year at the mining camp and for all workers at the industrial compound. Alongside these accommodations SOTRAMI has also made an effort to enhance quality of life through quality meals, sports infrastructure and cultural events.

This focus on risk prevention and mitigation contrasts with a sector where risk prevention is rare, unregistered accidents occur as a result and there is an absence of formal policies or outreach options. Simultaneously, issues such as discrimination or adherence to labour laws is not encouraged, thus not mitigating these problems either. Labour laws specifically have been noted for being much less prioritised by operators who know that the few state agencies that are likely to audit them will focus on other aspects such as occupational health and safety as well as environmental compliance.



Diagram 3: PSIA results for stakeholder category workers.

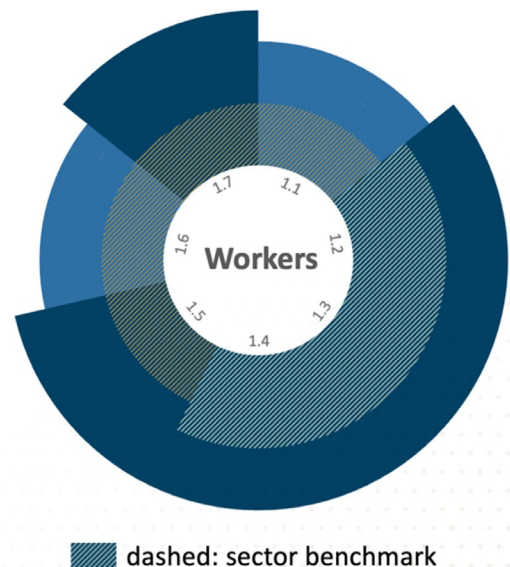


Diagram 4: PSIA results for stakeholder group workers in comparison to the sector benchmark.

² Workers whose contract is with a contractor that provides ongoing services such as janitorial services, cooking, and security

³ Workers whose contract is with a contractor that provides project-based services such as the construction of specific buildings/infrastructure

3.2.2 Community

SOTRAMI's significant community investment and consultations are reflected in both the positive attitude of interviewed stakeholders toward the company as well as the evaluated scores shown in *Diagram 5* and the lack of community complaints linked to the operation of the mine.

Again, SOTRAMI's performance is particularly notable given the sector's overall performance (*Diagram 6*). Moreover, this positive performance and perception is ongoing despite the fact that community outreach had to be paused in 2020-2021 due to the COVID-19 pandemic.

The PSIA evaluation signals that SOTRAMI's community outreach is based on yearly plans that are updated through community-needs-assessments, during which community members are consulted. Importantly, a key element of these plans is SOTRAMI's focus on the development of local capacities. Interviews with community members have confirmed this focus with a number of services previously provided by SOTRAMI now being provided by local authorities, following lobbying done by local representatives supported by SOTRAMI. In parallel, it should be noted that the risk mitigation ethos mentioned in relation to workers is also applied to community relations, decreasing potential conflict. For example, SOTRAMI has ensured that its road design avoids the community in order to prevent the generation of dust and the impacts this would have on public health or the quality of life.

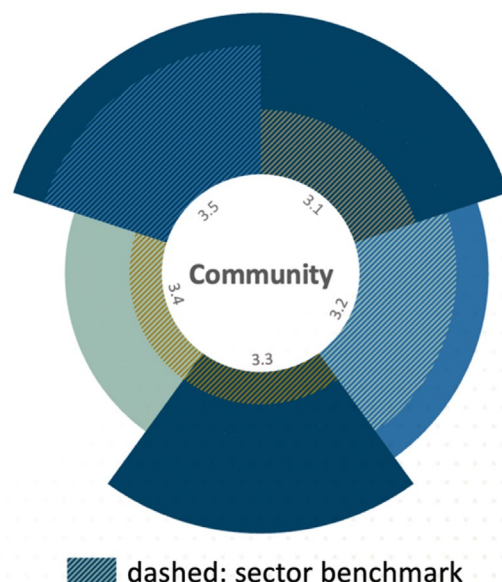
Additionally, SOTRAMI provides a number of services to the local community, several of which were made possible by the BGF, including:

- Provision of water to the entire community through its water pumping and distribution infrastructure.
- Development and maintenance of access roads.
- Monetary contributions to the refurbishment of the local health centre and police station and the donation of an ambulance.
- Support for the roll-out of COVID-19 vaccinations in Santa Filomena and neighbouring communities of Nueva Jerusalem, San Luis, and Yauca.
- Donations of school and medical equipment.
- Unskilled work opportunities for community members (road and infrastructure maintenance, town cleaning and beautification).

This compares positively to a sector where the contributions of mining operators are limited to the generation of jobs and where community relations are not systematised and can result in sometimes volatile conflict due to the informal and ad hoc nature of these relations.



Diagram 5: PSIA results for stakeholder group local communities



dashed: sector benchmark

Diagram 6: PSIA results for stakeholder group local communities in comparison to the sector benchmark.



3.2.3 Local suppliers

These are community members that work independently on the mining title under the supervision of the mining operator, who sell all of their production to the operator e.g., the artisanal small scale miners that are organized in the sociedades..

SOTRAMI has identified its internal suppliers as an opportunity to implement win-win partnerships as the benefits SOTRAMI is able to enjoy due to its involvement with said suppliers are matched by the high scores of positive social impacts generated by this interaction (see *Diagram 7*). SOTRAMI's performance is, once again, particularly notable given the sector's overall performance (see *Diagram 8*).

While SOTRAMI is a monopsonistic buyer for its internal suppliers, as these are under the obligation to sell it their production, in practice this relationship takes on the form of a partnership rather than a rigid business relationship. For example, the 20 sociedades working on the title not only strengthen the acceptability of the mine through job creation, which reinforces local support for the mine, but also offer a window for SOTRAMI to mitigate risks in the local ASM sector through the dissemination of best practices. Furthermore, sociedades can profitably exploit small ore veins that would not be viable for bigger operations, thus offering a complementary method of mining that allows SOTRAMI to efficiently exploit all of its deposits. Similarly, the seleccionadoras working on site not only contribute marginally to SOTRAMI's mineral feed, but their production can also help the company pinpoint resource efficiency problems through their work on the tailings. Their employment also reinforces SOTRAMI's social relations and offers the company additional points of entry for its social programmes in Santa Filomena.

In addition to trainings on and required compliance with OHS, environmental, and human rights demands, local suppliers also undergo some degree of sensibilisation on issues of gender equality, intra-familiar violence and further sensibilisation on human rights issues. Local suppliers are also the direct recipients of certain BGF financed projects, such as a recently purchased car for the seleccionadoras.

This approach contrasts favourably with a sector where mineral buyers exploit the highly asymmetric relations that exist to further personal agendas, where compliance with national legislation or good practices is routinely ignored because it is not conducive to cost cutting, and where gold laundering is an ongoing concern that has contaminated global gold supply chains emanating from South America.



Diagram 7: PSIA results for stakeholder group local suppliers (small scale entrepreneurs)



dashed: sector benchmark

Diagram 8: PSIA results for stakeholder group local suppliers in comparison to the sector benchmark.



3.2.4 Additional indicators

While SOTRAMI's operations take place in a complex landscape from a governance perspective due to the limited presence of government agencies, the region fortunately does not experience issues with the presence of armed groups or the involvement of organised crime or security forces in the mining sector.

However, even in this positive context, SOTRAMI presents a better performance than the sector by having applicable policies, passing these demands on to suppliers, and using robust risk identification, prevention and mitigation systems; which is reflected in the PSIA scores displayed in *Diagram 9*. This strong performance is particularly notable when compared (*see Diagram 10*) to a sector characterised by informal operations and short-termism, where the lack of management systems and of risk identification, prevention, and mitigation in particular, would leave operators exposed to the emergence of these issues.

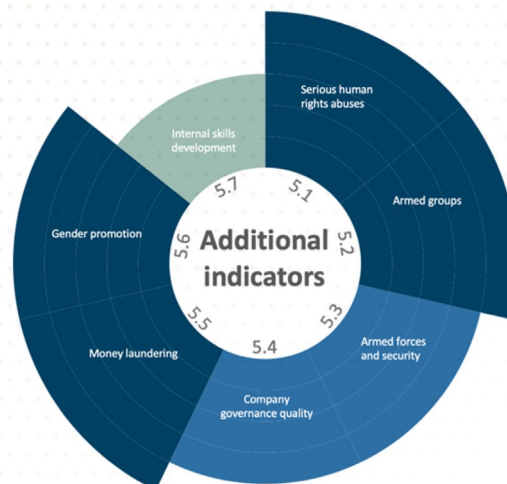


Diagram 9: PSIA results for additional indicators



Diagram 10: PSIA results for additional indicators in comparison to the sector benchmark.



4 Learnings from the case study

Reflecting on the stated objectives of the PSIA, the following learnings and conclusions have emerged.

First and foremost, the PSIA has highlighted not only the positive social balance of SOTRAMI's operations but also the lack of negative social impacts. Additionally, this performance compares favourably to a sector that operates haphazardly with a perspective limited to short-term profits.

Second, the information produced could be integrated into sourcing decisions that balance environmental and social factors, thus reflecting a more complete understanding of both positive and negative supply chain impacts. The use of the methodology also identified some areas for further improvement for SOTRAMI, even in the context of its exceptional performance.

Third, further than the generation of positive social impacts, the results of this evaluation also show that ASM can be an acceptable source of gold, meeting the high social sourcing standards of Richemont and its Maisons. However not all ASM operations are equal, as evidenced by the comparison between SOTRAMI and the sector baseline. This means that from the perspective of Richemont, special attention should be paid to ensure that suppliers either meet expectations the moment they are selected or that they are brought up-to-standard after their selection but before their production can be accepted.

Fourth, by comparing SOTRAMI within the sector, it was possible to highlight that its participation in the SBGI program led to substantial improvements over the years. This indicates that participation in programmes that technically and financially support the implementation of best practices is an effective way to contribute to measurable positive social impact at mine-level.

Finally, as evidenced by the findings that could be generated above, the deployment of a tailored PSIA for mining is fit for purpose.



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Interviews

- Remote interview of 7 Sector experts from: government agencies at the national and departmental level, national civil society organisation, UNDP projects, ASM service providers
- Representatives from all relevant departments of SOTRAMI, including heads of the administrative, civil engineering, commercial, community relations, environment and security, operations, and social wellbeing departments, as well as, general management of the company and of the mine.
- 8 community representatives.
- 11 workers, both staff and contractors.
- 9 local suppliers.

