

TSM ASSESSMENT PROTOCOL

A Tool for Assessing Aboriginal and Community Outreach Performance

Introduction

Launched in 2004, Towards Sustainable Mining (TSM) is an initiative of The Mining Association of Canada designed to enhance the industry's reputation by improving its performance. MAC members subscribe to TSM guiding principles, a set of commitments that addresses all areas of our industry's performance.

These guiding principles are backed by specific performance indicators, which member companies began reporting against in 2004. These indicators are designed to identify the industry's current performance in key areas, and point to actions that could be taken to improve. Areas for which performance indicators have been developed include tailings management, energy use and greenhouse gas emissions management, Aboriginal and community outreach, biodiversity conservation management, safety and health, and crisis management planning.

This document provides a tool to assist companies in the assessment of the standard of Aboriginal and community outreach currently being implemented by their facilities, in conformance with the TSM Aboriginal and community outreach performance indicators. This protocol is an evolution of the former MAC Protocol entitled External Outreach. It builds from the original protocol, and provides greater specificity in terms of expectations for outreach and engagement with Aboriginal communities and other communities of interest. This protocol replaces the former External Outreach protocol for use in facility level assessments and reporting to MAC. It enables key performance indicators to be segregated and performance improvements for each indicator tracked year to year. The use of this protocol also enhances the consistency of assessments conducted across companies. In addition, this tool has been designed to enable external verification of company performance, consistent with the TSM verification system and the initiative's commitment to transparency and accountability.

Assessing Aboriginal and Community Outreach Implementation

The purpose of the assessment protocol is to provide guidance to the member companies in completing their evaluation of Aboriginal and community outreach performance against TSM indicators. The assessment protocol sets out the general expectations of MAC for Aboriginal and community outreach by its member companies in support of the TSM initiative. This protocol supports implementation of MAC's TSM Aboriginal Relations Framework approved in November 2008.

The assessment should also:

- Assist member companies to develop capacity to monitor and improve performance; and
- Provide a basis for company assurance

As with any assessment of a management system, professional judgment is required in assessing the degree of implementation of a system indicator and the quality of management processes and intervention. Application of this protocol will therefore require a level of expertise in auditing and systems assessment and some knowledge of and experience in the practice of external outreach. This assessment protocol provides an indicator of the level of implementation of Aboriginal and community outreach in support of the TSM initiative and is not, of itself, a guarantee of the effectiveness of Aboriginal and community outreach activities.

Performance Indicators

Four performance indicators have been established.

1. Community of Interest Identification
2. Effective COI Engagement and Dialogue
3. COI Response Mechanism
4. Reporting

Five levels of performance are identified for each indicator. Criteria further define performance at each level, as illustrated below.

Aboriginal and Community Outreach <u>ASSESSMENT CRITERIA</u>	
Level	Criteria
C	No systems in place; activities tend to be reactive; procedures may exist but they are not integrated into policies and management systems
B	Actions are not fully consistent or documented; systems/processes planned and being developed
A	Systems/processes are developed and implemented
AA	Integration into management decisions and business functions
AAA	Excellence and leadership

Specific criteria for each performance indicator are provided in subsequent tables to enable the assessor to determine an appropriate level of performance (Levels C-AAA).

When conducting the assessment, assessors should note that the four indicators complement one another. As such, performance improvements in one indicator may depend and/or coincide with performance improvements in another. For example, improved performance in COI engagement and dialogue (Indicator 2) is unlikely to occur unless COI identification has also improved.

The assessor is required to select the level that most clearly represents the status of the operation. Only one level can be selected for each indicator, and it can be chosen only if all criteria for that level and all preceding levels have been met.

Where a performance element or indicator is not relevant, then an assessment of N/A should be assigned.

The goal of each MAC member is to achieve, at a minimum, a consistent “A” ranking on the TSM Aboriginal and community outreach assessment and to work towards continuous improvement.

Facility-level Assessments

Respondents are expected to provide facility-level assessments for each specified indicator.

By “facility-level assessments”, it is intended that companies will complete an assessment and report on Aboriginal and community outreach for each distinct operating unit, or facility, of the company. It is recognized that companies may categorize their facilities in different ways.

Facility-level reporting has been found to be the most reliable, informative and useful approach for performance evaluation. The TSM on-line performance reporting database has been designed to facilitate assessment on a facility by facility basis.

Assessment Process

It is recommended that the assessment be completed using a process of interview, discussion and document review, including representative site management, operations and specialist personnel. A level of expertise in auditing and systems assessment and some knowledge of and experience in Aboriginal relations and community outreach is required.

Only one level can be selected for each indicator, and it can be chosen only if all criteria for that level and all preceding levels have been met. No partial levels of performance (e.g. B+) can be reported. Where a performance element or indicator is not relevant, then an assessment of N/A should be assigned.

Where an operation is shared between two parties, e.g. a joint venture, the two parties are encouraged to discuss amongst themselves who should complete the assessment, whether it should be undertaken jointly or divided so that the results reflect the appropriate activities of each company.

Structure of the Assessment Protocol

For each indicator, the protocol provides:

- A statement of purpose that expresses the spirit and intent of the indicator
- Assessment criteria for each level of performance
- Supporting guidelines to help the assessor to understand the general scope of each indicator and to act as a framework for reviewing documentation and conducting interviews necessary for the assessment of the company’s (or facilities) performance
- Frequently Asked Questions (FAQs) that provide further information, such as definitions for key terms and answers to common questions that arise.

1. COMMUNITY OF INTEREST (COI) IDENTIFICATION

Purpose:

To confirm that efforts have been made to identify COI, including Aboriginal communities and organizations, affected or perceived to be affected by their operations or who have a genuine interest in the performance and activities of a company and/or operation.

Communities of Interest (COI) Identification <u>ASSESSMENT CRITERIA</u>	
Level	Criteria
C	COI have not been identified
B	Some local or direct COI have been identified Plans are in place to develop a formal system for identifying COI
A	A formal and documented system is in place for COI identification at the local or site level that includes challenging interests
AA	The formal and documented system in place for identification of COI at the site includes COI whose interest in the operation may be indirect and issues-based (e.g., provincial and national NGOs)
AAA	The COI themselves are invited to provide regular input into the identification of COIs to ensure that consideration is given to a broad range of interests

Community of Interest (COI) Identification FREQUENTLY ASKED QUESTIONS

#	FAQ	PAGE #
1	What is a Community of Interest (COI)?	<i>See page 13</i>
2	What is an Aboriginal person?	<i>See page 13</i>
3	What is an Indigenous person?	<i>See page 13</i>
4	How does a facility identify Aboriginal communities and organizations that are affected or perceived to be affected by the operations or who have a genuine interest in performance and activities of a company and/or operation?	<i>See page 14</i>
6	Can corporate documentation be used to demonstrate facility-level commitment?	<i>See page 14</i>
7	What does “formal” mean?	<i>See page 15</i>
8	What is a “system”?	<i>See page 15</i>
9	What does “accountability” mean?	<i>See page 16</i>
10	What does “responsibility” mean?	<i>See page 16</i>

Community of Interest (COI) Identification SUPPORTING GUIDELINES

Through interview and review of documentation, determine that :

- Communities of Interest (COI) have been formally identified and documented.
- There is a formal system for identifying COI.
- There is an interactive process that involves COI in identifying other groups or communities that should be considered a COI.
- Documentation and research has been completed and documented to identify a) Aboriginal traditional lands and Treaty rights potentially affected by the operation and b) on-going traditional use of the land for hunting, fishing, trapping and related harvest activities in the area of development.
- The process for identifying COIs explicitly considers a range of COIs, including those with challenging interests or who may have voiced concerns regarding the operation.
- The process for identifying COIs goes beyond local COIs to consider if there are other COI who may have a less direct and/or issue-specific interest in the site.

2. EFFECTIVE COI ENGAGEMENT AND DIALOGUE

Purpose:

To confirm that processes have been established to communicate with COI, including Aboriginal communities and organizations, to understand their viewpoint, to transparently inform them of company activities and performance, to actively engage them in dialogue and participation on issues of concern to them, and to identify how issues might be addressed through measures such as mitigation, compensation, or other actions.

Effective COI Engagement and Dialogue <u>ASSESSMENT CRITERIA</u>	
Level	Criteria
C	<p>Communications with COI are reactive.</p> <ul style="list-style-type: none"> ■ The facility has no formal engagement and dialogue processes. ■ COI are neither consulted nor engaged. ■ Communications are typically one way only.
B	<ul style="list-style-type: none"> ■ Informal engagement processes are in place, and occasional dialogue occurs with COI. ■ There are plans to develop formal COI engagement systems, but they have not been implemented.
A	<p>Formal and documented COI engagement and dialogue systems are in place.</p> <ul style="list-style-type: none"> ■ The facility provides assistance to ensure COI are able to participate in engagement and dialogue processes, where appropriate. ■ Communications are written in the local language for COI (as required) and are written in language that is clear and understandable to COI. ■ Clear accountability has been established for COI engagement and dialogue and consultation requirements transferred to the project proponent by governments. ■ Time is built into processes to allow for meaningful review of proposals by COI. ■ Relevant materials are provided to COI for review in a timely manner.

Effective COI Engagement and Dialogue

ASSESSMENT CRITERIA continued

AA	<p>COI input into decisions that affect them is actively encouraged</p> <ul style="list-style-type: none">■ Processes exist to identify the needs of COI for capacity building to allow COI to engage in effective participation on issues of interest or concern to them.■ Accountability for COI engagement and dialogue rests with senior management.■ Senior management reviews engagement and dialogue systems and processes annually.■ Engagement and dialogue training is provided to designated employees, including appropriate culturally specific training.■ Designated employees are informed of and trained in meeting Aboriginal consultation requirements transferred to the proponent by governments.■ Traditional knowledge is sought, as appropriate, from local Aboriginal communities and organizations and is applied to support decisions and inform practices including environmental monitoring.■ Consultation protocols established by Aboriginal communities and organizations are followed or integrated into company consultation procedures to the extent possible.
AAA	<p>Formal mechanisms or agreements with COI are in place to ensure they can effectively participate in issues and influence decisions that may interest or affect them.</p> <ul style="list-style-type: none">■ The facility has a consistent history of meaningful engagement with COI.■ Formal processes to build the capacity of COI to allow them to effectively participate in dialogue exist.■ COI contribute to periodic reviews of engagement processes to allow continual improvement.■ Negotiated agreements with Aboriginal peoples are in place for the operations or projects where appropriate.

Effective COI Engagement and Dialogue

FREQUENTLY ASKED QUESTIONS

#	FAQ	PAGE #
1	What is a Community of Interest (COI)?	See page 13
2	What is an Aboriginal person?	See page 13
3	What is an Indigenous person?	See page 13
5	What are negotiated agreements?	See page 14
6	Can corporate documentation be used to demonstrate facility-level commitment?	See page 14
7	What does “formal” mean?	See page 15
8	What is a “system”?	See page 15
9	What does “effective” mean?	See page 15
10	What does “clear and understandable” mean?	See page 15
11	What is meant by “capacity building”?	See page 15
12	What are “engagement” and “dialogue”?	See page 15
13	How is “senior management” defined?	See page 16

Effective COI Engagement and Dialogue

SUPPORTING GUIDELINES

Through interview and review of documentation, determine that:

- The COI are regularly engaged.
- The outcomes of the dialogues are documented.
- The communication and engagement process includes formal agreements with COI respecting the process for dialogue.
- Assistance is provided to COI, as appropriate, to allow them to effectively participate in dialogue.
- The communications to COI are clear, understandable and take place sufficiently early for meaningful dialogue to take place.
- Accountabilities for COI dialogue within the company/facility are defined and documented.
- There is participation by COI in decisions that may interest or affect them.
- Traditional knowledge is sought, as appropriate, from local Aboriginal communities and organizations and is applied to support decisions and inform practices including environmental monitoring.
- The COI engagement and dialogue process is regularly reviewed to ensure it remains effective.
- Responsibility for the process review is established, including receiving reports on outcomes.
- Employees involved in Aboriginal and community outreach or Aboriginal consultation receive training on engagement and dialogue, including appropriate culturally specific training.
- There are processes to assist COI in developing their skills in effective dialogue.
- Negotiated agreements with Aboriginal peoples are in place for the operations or projects where appropriate.

3. COI RESPONSE MECHANISM

Purpose:

To confirm that there are processes to receive complaints and concerns from COI, including Aboriginal communities and organizations, to ensure that they are understood and effectively responded to.

COI Response Mechanism ASSESSMENT CRITERIA	
Level	Criteria
C	<p>Minimal effort has been made to understand or incorporate COI concerns or consultation requirements.</p> <ul style="list-style-type: none"> ■ There are no systems to track or respond to COI concerns.
B	<p>The facility has an incomplete knowledge of COI concerns or consultation requirements.</p> <ul style="list-style-type: none"> ■ The facility gives occasional consideration to COI concerns, based mostly on assumptions and sporadic consultations. ■ An informal complaint system exists. ■ Plans exist to develop a formal complaint and response system.
A	<p>The facility has a good understanding of COI concerns and consultation requirements and documents them.</p> <ul style="list-style-type: none"> ■ A formal complaint and response system is in place with processes for follow-up and tracking. ■ COI input is considered in decision making.
AA	<p>The facility has a thorough, documented knowledge of COI issues, concerns and consultation requirements.</p> <ul style="list-style-type: none"> ■ The facility analyzes and acts upon the input received from COI. ■ Senior management considers results of the engagement and dialogue processes at least annually to determine if and how to act upon them. ■ Sufficient time is built into site processes to consider and respond to COI concerns before specific plans are carried out by the company.
AAA	<p>The facility collaborates with COI to establish and achieve common objectives.</p> <ul style="list-style-type: none"> ■ Collaboration extends to address common community goals.

COI Response Mechanism FREQUENTLY ASKED QUESTIONS

#	FAQ	PAGE #
1	What is a Community of Interest (COI)?	See page 13
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7	What does “formal” mean?	See page 15
8	What is a “system”?	See page 15
9	What does “effective” mean?	See page 15
12	What are “engagement” and “dialogue”?	See page 15
13	How is “senior management” defined?	See page 16

COI Response Mechanism SUPPORTING GUIDELINES

Through interview and review of documentation, determine that:

- Formal systems for understanding, tracking and responding to COI concerns are in place.
- Senior management regularly reviews dialogue processes to ensure they remain effective, and management is responsive to concerns.
- COI are consulted in a timely and culturally appropriate manner, and their concerns and comments considered prior to decision-making by the company.
- Issues of mutual concern are addressed collaboratively.

4. REPORTING

Purpose:

To confirm that reporting on COI engagement and dialogue activities (including activities with Aboriginal communities and organizations) is open and transparent.

Reporting <u>ASSESSMENT CRITERIA</u>	
Level	Criteria
C	No reporting on COI engagement occurs beyond regulated requirements.
B	Reporting on COI engagement and dialogue activities is inconsistent. Reporting is internal only.
A	Formal reporting systems on COI engagement and dialogue activities are in place. The system includes responses to COI on concerns raised by them.
AA	Response to COI concerns is reported publicly on a regular basis. ¹ Opportunities exist for COI to provide feedback on public reporting.
AAA	COI provide input into the scope of public reporting. COI feedback on engagement, dialogue and consultation processes and outcomes is actively sought and reported publicly.

¹ Where COI concerns are considered confidential (e.g. those related to negotiated agreements), public disclosure of the concerns and the company's response is not required.

Reporting **FREQUENTLY ASKED QUESTIONS**

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12	What are “engagement” and “dialogue”?	See page 15

Reporting **SUPPORTING GUIDELINES**

Through interview and review of documentation, determine:

- If the company regularly reports on its Aboriginal and community engagement and dialogue activities.
- How these reports are released (i.e. internally only, to the COI only, publicly).
- What information is included in the reports.
- Whether reporting systems are formalized.
- If COI input is sought on reporting processes and outcomes.
- If COI provide input into the scope of public reporting.

APPENDIX 1: FREQUENTLY ASKED QUESTIONS

PROTOCOL-SPECIFIC GUIDANCE

1. What is a Community of Interest (COI)?

COI include all individuals and groups who have an interest in, or believe they may be affected by, decisions respecting the management of operations. They include, but are not restricted to:

- employees
- Aboriginal or indigenous peoples
- mining community members
- suppliers
- neighbours
- customers
- contractors
- environmental organizations and other non-governmental organizations
- governments
- the financial community, and
- shareholders.

2. What is an Aboriginal person?

An Aboriginal person, for the purposes of this protocol, shall be as defined under Section 35(2) of the Constitution Act (1982) of Canada and includes First Nation, Métis and Inuit peoples.

3. What is an Indigenous person?

In the thirty-year history of indigenous issues at the United Nations, considerable thinking and debate have been devoted to the question of definition of “indigenous peoples”, but no such definition has ever been adopted by a UN-system body.

The working definition reads as follows:

“Indigenous communities, peoples and nations are those which, having a historical continuity with pre-invasion and pre-colonial societies that developed on their territories, consider themselves distinct from other sectors of the societies now prevailing on those territories, or parts of them. They form at present non-dominant sectors of society and are determined to preserve, develop and transmit to future generations their ancestral territories, and their ethnic identity, as the basis of their continued existence as peoples, in accordance with their own cultural patterns, social institutions and legal system.

“This historical continuity may consist of the continuation, for an extended period reaching into the present of one or more of the following factors:

- a) Occupation of ancestral lands, or at least of part of them;
- b) Common ancestry with the original occupants of these lands;
- c) Culture in general, or in specific manifestations (such as religion, living under a tribal system, membership of an indigenous community, dress, means of livelihood, lifestyle, etc.);
- d) Language (whether used as the only language, as mother-tongue, as the habitual means of communication at home or in the family, or as the main, preferred, habitual, general or normal language);
- e) Residence on certain parts of the country, or in certain regions of the world;
- f) Other relevant factors.

“On an individual basis, an indigenous person is one who belongs to these indigenous populations through self-identification as indigenous (group consciousness) and is recognized and accepted by these populations as one of its members (acceptance by the group).

“This preserves for these communities the sovereign right and power to decide who belongs to them, without external interference”.

See: http://www.un.org/esa/socdev/unpfii/documents/workshop_data_background.doc

Note that the term “indigenous person” is used outside of Canada. Within Canada, the term “Aboriginal person” is used.

4. How does a facility identify Aboriginal communities and organizations that are affected or perceived to be affected by the operations or who have a genuine interest in performance and activities of a company and/or operation?

The facility must conduct research to identify a) Aboriginal traditional lands and Treaty rights potentially affected by the organization, and b) on-going traditional use of the land for hunting, fishing, trapping and related harvest activities in the area of development. For some companies, this process is completed as part of the Environmental Impact Statement through which they assess Aboriginal rights to affected areas.

5. What are negotiated agreements?

This term refers to agreements negotiated with third parties and may include Impact Management Agreements, Participation Agreements, Impact Benefit Agreements, Socio-Economic Agreements, Environmental Agreements, among others. Many of these agreements contain confidentiality provisions which preclude public reporting of the terms, conditions, and progress made in implementing the agreements.

6. Can corporate documentation be used to demonstrate facility-level commitment?

Written senior management commitment at the corporate level (e.g. a corporate policy) can only be accepted as evidence during a facility-level self-assessment or TSM verification if it is accompanied by evidence that the corporate commitment is being applied and adhered to at the facility level. There must be evidence of a link between the corporate documentation and facility-level practices. If this linkage is established, then the corporate documentation can be accepted as evidence of facility-level commitment.

DEFINITION OF KEY TERMS

7. What does “formal” mean?

The term “formal” is used frequently in the assessment, and usually in conjunction with “system” or “process”. Formalized processes or activities are usually given status through clear and precise requirements, usually documented as a written procedure. This means that the business can clearly and easily demonstrate that the process or system is in place. It would also typically require documented processes or an “audit trail”.

8. What is a “system”?

A system, or “management system” represents processes that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively to achieve a specified outcome and to drive continual improvement in performance. A systems approach to management requires an assessment of what needs to be done, planning to achieve the objective, implementation of the plan and review of performance in meeting the set objective. A management system also considers necessary personnel, resources and documentation requirements. Other definitions associated with systems are:

- **Policy:** The formal expression of management’s commitment to a particular issue area that presents the stance of the company to interested external parties.
- **Practice:** Informal, undocumented approaches to carrying out a task.
- **Procedure:** A formalized, documented description of how a task is to be carried out.

9. What does “effective” mean?

Where the term “effective” is used, it requires the element to be fully operational in order that desired outcomes can be achieved.

10. What does “clear and understandable” mean?

Clear and understandable means that language in communications is at a reading level that is appropriate for the typical educational level of attainment of COIs and is free from technical jargon.

11. What is meant by “capacity building”?

Capacity building refers to the development, fostering and support of resources and relationships at individual, organizational, inter-organizational and systems levels, so that the COI can effectively engage with facilities and transfer information within the COI.

12. What are “engagement” and “dialogue”?

Engagement is a process of two-way communication that addresses the specific needs for information of COI and the company/facility in a way that is understandable to the participants in the discussion. Dialogue is a form of communication that leads to shared understanding between participants.

13. How is “senior management” defined?

For the purposes of Aboriginal and community outreach performance measurement, senior management refers to the corporate and/or site personnel with overall accountability for engagement and dialogue processes. For large organizations with many sites, outreach takes place at several levels – community, regional and national. In these circumstances, senior management describes personnel with overall responsibility for outreach at each of the various levels.

14. What does “accountability” mean?

Accountability: The Aboriginal and community outreach management system must identify the party who is ultimately answerable for Aboriginal and community outreach performance and the development and implementation of the Aboriginal and community outreach management system at the facility. This accountability cannot be delegated. Resources are available to the accountable party to ensure proper systems (training, equipment, communications, etc) are in place to effectively meet their Aboriginal and community outreach goals.

15. What does “responsibility” mean?

Responsibility: Within the aboriginal and community outreach management system, specific Aboriginal and community outreach related requirements and tasks are identified and assigned to specific positions within the facility. It is important that responsibilities are clearly communicated so that each position understands what is expected of them.

16. APPENDIX 2: TSM SELF ASSESSMENT CHECKLIST

Aboriginal and Community Outreach

Facility name:		Company name:	
Assessed by:		Date submitted:	

SUPPORTING DOCUMENTATION / EVIDENCE:	
NAME OF DOCUMENT	LOCATION

Interviewees:			
NAME	POSITION	NAME	POSITION

	Question	Y	N	NA	Description & Evidence
INDICATOR 1: COI IDENTIFICATION					
Indicator 1 Level B	Have some local COI been identified?				
	Are there plans in place to develop a formal system for identifying COI?				
	<i>If you have answered "Yes" to all of the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all of the Level B questions, assess the facility as a Level C.</i>				
Indicator 1 Level A	Is there a formal and documented system for identifying COI?				
	Does the system allow for identification of COIs at the local or site level that includes challenging interests?				
	Has research been completed and documented to identify a) Aboriginal traditional lands and Treaty rights potentially affected by the operation and b) on-going traditional use of the land for hunting, fishing, trapping and related harvest activities in the area of development?				
<i>If you have answered "Yes" to all of the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all of the Level A questions, assess the facility as a Level B.</i>					
Indicator 1 Level AA	Does the system allow for identification of COIs whose interest in the operation may be indirect and issues-based?				
	If yes, please provide some examples.				
<i>If you have answered "Yes" to all of the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all of the Level AA questions, assess the facility as a Level A.</i>					
Indicator 1 Level AAA	Is there an interactive process that involves COI in identifying other groups or communities that should be considered a COI?				
	<i>If you have answered "Yes" to all of the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all of the Level AAA questions, assess the facility as a Level AA.</i>				
ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 1					Level: _____

	Question	Y	N	NA	Description & Evidence
INDICATOR 2: EFFECTIVE COI ENGAGEMENT AND DIALOGUE					
Indicator 2 Level B	Are informal engagement processes in place that result in occasional dialogue with COI?				
	Are there plans in place to develop a formal COI engagement system?				
	<i>If you have answered "Yes" to all of the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all of the Level B questions, assess the facility as a Level C.</i>				
Indicator 2 Level A	Is there a formal and documented COI engagement and dialogue system in place?				
	Does the facility provide assistance to ensure COI are able to participate in engagement and dialogue processes, where appropriate?				
	Are communications clear and understandable to COI, and written in the local language (as required)?				
	Has clear accountability been established for COI engagement and dialogue?				
	Is sufficient time built into engagement and dialogue processes to allow for meaningful COI involvement?				
	If yes, please provide some examples.				
	Are relevant materials provided to COI in a timely manner?				
<i>If you have answered "Yes" to all of the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all of the Level A questions, assess the facility as a Level B.</i>					
Indicator 2 Level AA	Is COI input into decisions that affect them actively encouraged?				
	Are processes in place to identify the needs of COI for capacity building so that COI can effectively participate?				
	Does accountability for COI engagement and dialogue rest with operations senior management?				
	Is engagement and dialogue training provided to designated employees, including appropriate culturally specific training?				
	Does senior management review engagement and dialogue systems and processes annually?				

	Question	Y	N	NA	Description & Evidence
	Have designated employees been informed of and trained in meeting Aboriginal consultation requirements transferred to the proponent by governments?				
	Is traditional knowledge sought, as appropriate, from local Aboriginal communities and organizations and applied to support decisions and inform practices including environmental monitoring?				
	Are consultation protocols established by Aboriginal communities and organizations followed or integrated into company consultation procedures to the extent possible?				
<i>If you have answered "Yes" to all of the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all of the Level AA questions, assess the facility as a Level A.</i>					
Indicator 2 Level AAA	Are there formal mechanisms or agreements with COI in place to ensure they can effectively participate in issues and influence decisions that may interest or affect them?				
	Does the facility have a consistent history of meaningful engagement with COI?				
	Do COI contribute to periodic reviews of engagement processes to allow for continual improvement?				
	Are negotiated agreements with Aboriginal peoples in place for the operations or projects where appropriate?				
	<i>If you have answered "Yes" to all of the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all of the Level AAA questions, assess the facility as a Level AA.</i>				
	ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 2			Level: _____	

	Question	Y	N	NA	Description & Evidence
INDICATOR 3: COI RESPONSE MECHANISM					
Indicator 3 Level B	Does the facility give occasional consideration to COI concerns?				
	Is there an informal complaint system in place?				
	Are there plans in place to develop a formal complaint and response system?				
	<i>If you have answered "Yes" to all of the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all of the Level B questions, assess the facility as a Level C.</i>				
Indicator 3 Level A	Does the facility have a good understanding of COI concerns?				
	Are these concerns documented?				
	Is there a formal complaint and response system in place with processes for follow-up and tracking?				
	Is COI input considered in decision-making?				
	If yes, how?				
<i>If you have answered "Yes" to all of the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all of the Level A questions, assess the facility as a Level B.</i>					
<i>NOTE: If a facility has not fully identified its COI, it cannot have thorough, documented knowledge of COI issues and concerns. This means that if a facility scored Level B for Indicator 1, it cannot score higher than a Level A for Indicator 3.</i>					
Indicator 3 Level AA	Does the facility have a thorough, documented knowledge of COI issues and concerns?				
	Does the facility analyze and act on input received from COI?				
	If yes, please provide some examples.				
	Does senior management consider the results of the engagement and dialogue processes at least annually to determine if and how to act on them?				
	Is sufficient time built into site processes to consider and respond to COI concerns before specific plans are carried out?				
If yes, please provide some examples.					

	Question	Y	N	NA	Description & Evidence
	<p><i>If you have answered "Yes" to all of the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all of the Level AA questions, assess the facility as a Level A.</i></p>				
Indicator 3 Level AAA	Does the facility collaborate with COI to establish and achieve common objectives? If yes, please provide some examples.				
	Does this collaboration extend to address common community goals?				
	<p><i>If you have answered "Yes" to all of the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all of the Level AAA questions, assess the facility as a Level AA.</i></p>				
	ASSESSED LEVEL OF PERFORMANC FOR INDICATOR 3			Level: _____	

	Question	Y	N	NA	Description & Evidence
INDICATOR 4: REPORTING					
Indicator 4 Level B	Is there some internal reporting on community engagement and dialogue?				
	<i>If you have answered "Yes" to all of the Level B questions, continue to the Level A questions. If you have not answered "Yes" to all of the Level B questions, assess the facility as a Level C.</i>				
Indicator 4 Level A	Are there formal reporting systems on community engagement and dialogue activities in place?				
	Does this system include responses to COIs on concerns raised by them?				
	<i>If you have answered "Yes" to all of the Level A questions, continue to the Level AA questions. If you have not answered "Yes" to all of the Level A questions, assess the facility as a Level B.</i>				
Indicator 4 Level AA	Are responses to COI concerns publicly reported on a regular basis?				
	Do opportunities exist for COI to provide feedback on public reporting?				
	<i>If you have answered "Yes" to all of the Level AA questions, continue to the Level AAA questions. If you have not answered "Yes" to all of the Level AA questions, assess the facility as a Level A.</i>				
Indicator 4 Level AAA	Do COI provide input into the scope of public reporting?				
	Is COI feedback on engagement and dialogue processes and outcomes actively sought and reported publicly?				
	<i>If you have answered "Yes" to all of the Level AAA questions, assess the facility as a Level AAA. If you have not answered "Yes" to all of the Level AAA questions, assess the facility as a Level AA.</i>				
ASSESSED LEVEL OF PERFORMANCE FOR INDICATOR 4					Level: _____