**FINNISH TOWARDS SUSTAINABLE MINING (TSM) STANDARD   
ASSESSMENT PROTOCOL  
A Tool for Assessing Mine Closure Performance**

**Introduction**

This document provides a tool for assisting companies in the site- or facility-level assessment of their current standard of mine closure management. The level of mine closure performance is monitored using three performance indicators in accordance with this assessment tool. It enables key performance indicators to be segregated, and performance improvements for each indicator to be tracked from year to year. The use of this protocol also enhances the consistency of mine closure performance assessments conducted across companies. In addition, the tool has been designed to enable the external verification of company performance.

**Assessing Mine Closure Management Implementation**

Appropriate mine closure is an integral part of mine life cycle management and sustainable development.

***What does mine closure mean?***

*Mine closure refers to the termination of mining operations at the site and the related measures and post-closure activities. In general, the aim is to ensure the highest possible physical, chemical and biological stability at the site and to avoid any risk to the environment and public health and safety.*

The purpose of the assessment protocol is to provide guidance to companies in completing their evaluation of mine closure management. The assessment should:

* assist companies in developing their capacity to monitor and improve their performance
* provide a basis for the related auditing.

Professional judgement is required when assessing the management system. The application of the assessment protocol of the Finnish TSM standard requires that the assessor have sufficient expertise in the practice of mine closure management and management systems assessment. When carrying out an assessment, account must be taken of cooperation between the employer and employees. The assessment protocol of the Finnish TSM standard is not, in itself, a guarantee of the effectiveness of mine closure management activities, but can be used to measure performance levels. A self-assessment checklist is attached to this document (Appendix 2).

**Performance Indicators**

Three performance indicators have been established for mine closure.

1. Mine closure policy and operational guidelines
2. Mine closure planning and management system based on the mine life cycle
3. Mine closure planning at the project design stage
4. Progressive mine closure and assigned accountability for mine closure
5. Mine closure and post-closure activities
6. Reporting on mine closure measures

Five levels of performance are identified for each indicator. Assessment criteria are used to further define performance at each level, as illustrated below. A base assumption is made that all companies are in compliance with all legal and regulatory requirements.

Specific assessment 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 three indicators complement one another. The performance level is determined by the fulfilment of the requirements of the criteria.

Wherever a performance element or performance indicator is irrelevant, the assessment given should be N/A. For each indicator, only one level can be reached, which is determined by the lowest level that meets the requirements. All criteria at that level and below must be met. The overall level of the Mine Closure Performance is determined by the lowest level achieved.

**The goal of each company is to achieve an “A” ranking at a minimum and to work towards continuous improvement.**

**Facility-level Assessments**

Companies are expected to complete an assessment and report on the performance indicators for mine closure for each distinct site or facility. When planning the assessment, account must be taken of the organisational structure of mining operators, as companies may categorise their facilities and define their sites in various ways. This assessment protocol focuses on companies operating in Finland and their sites and facilities, in particular.

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

**Assessment Process**

It is recommended that the assessment include interviews, discussions and document reviews. The assessment must include the management, as well as production and specialist personnel representing the site or facility. A level of expertise in auditing and management systems assessment and some knowledge and experience of mine closure management are required. For each performance indicator, only one level can be reached 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 an operation is shared between two parties, e.g. a joint venture, the two parties are encouraged to discuss who should complete the assessment, and whether it should be undertaken jointly or divided up so that the results reflect the appropriate activities of each company.

**Structure of the Assessment Protocol**

For each performance indicator, the assessment protocol provides:

* a statement of purpose that expresses the spirit and intent of the indicator
* assessment criteria for each level of performance (C-AAA)
* supporting guidelines to help the assessor 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 site’s/facility’s performance
* Frequently Asked Questions (FAQs) that provide further information, such as definitions of key terms and answers to more commonly asked questions.

**PERFORMANCE INDICATOR 1**

**MINE CLOSURE POLICY AND OPERATIONAL GUIDELINES**

**Purpose:**

To confirm that companies have established a policy and operational guidelines that express their intent, commitments and principles in relation to mine closure.

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| **Performance Indicator 1**  **Mine Closure Policy and Operational Guidelines**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | Activities meet the requirements set in Finnish legislation. No formal mine closure policy and operational guidelines developed. Policy and operational guidelines assumed to be covered by overall site management policies, but these do not specifically address mine closure. |
| **B** | Mine closure policy and operational guidelines in place but may not be consistent with the intent of the guiding principles of the Finnish towards sustainable mining standard. |
| **A** | Policy and operational guidelines in conformance with the guiding principles of the Finnish towards sustainable mining standard, developed and/or reviewed in consultation with communities of interest, endorsed by senior management, and implemented with budget allocation. |
| **AA** | The principles of mine closure applied in accordance with the policy and the operational guidelines correspond at a minimum to the requirements of the best available techniques (BAT)[[1]](#footnote-1). In addition, the site is committed to studying emerging technologies and techniques and applying these to its operations and to the planning and implementation of mine closure. However, due to the long perspective of mine closure, it should be noted that the technologies and techniques applied in mine closure must be reliable in order to minimise any risks posed by the closure.  The policy and the operational guidelines have been formally verified through an internal, independent audit. |
| **AAA** | In addition to the above, the policy and the operational guidelines include a commitment to take account of the impacts of mine closure on the surrounding community and to identify measures to minimise any adverse socio-economic impacts of mine closure.  The policy and the operational guidelines have been formally verified through an external, independent audit. |

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| **Mine Closure Policy and Operational Guidelines**  **FREQUENTLY ASKED QUESTIONS** | | |
| **No. in APPX. 1.** | **FAQ** | **PAGE** |
| [1](#_bookmark9) | [Does a “mine closure policy” have to be a stand-alone document?](#_bookmark10) | See page 1[5](#_bookmark8) |
| [2](#_bookmark11) | [Can corporate documentation be used to demonstrate commitment?](#_bookmark12) | [See page 1](#_bookmark11)5 |
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| [7](#_bookmark24) | [What is a community of interest (COI)?](#_bookmark25) | [See page 1](#_bookmark24)6 |
| 9 | What do “accountability” and “responsibility” mean? | See page 17 |
| **Mine Closure Policy and Operational Guidelines**  **SUPPORTING GUIDELINES FOR THE ASSESSOR**  Through interviews and the review of documentation, clarify the following issues:   * That the company has established and maintains a policy and operational guidelines respecting the guiding principles of the Finnish towards sustainable mining standard. * That the policy and the operational guidelines accurately reflect the existing commitments and views of senior management regarding mine closure and its expected outcomes. * That there has been consultation with communities of interest on developing and/or reviewing the policy and the operational guidelines. * That the policy and the operational guidelines have been implemented, as demonstrated by the budget and resource allocation. That managers and employees appear to be familiar with the policy and operational guidelines and understand their basic intent. * How management and employee awareness of the policy and the operational guidelines is maintained over time – also determine the specific means employed. * That the policy and the operational guidelines establish an ongoing programme of review and continual improvement. * What audit processes are in place to ensure that the policy and the operational guidelines are in conformance with the *Handbook for Mine Closure*. * Whether an internal or external audit of the mine closure policy and the operational guidelines has been carried out within the last three years. | | |

**PERFORMANCE INDICATOR 2 (2A, 2B AND 2C)**

**MINE CLOSURE PLANNING AND MANAGEMENT SYSTEM BASED ON THE MINE LIFE CYCLE**

Performance Indicator 2A applies to the operations of projects in the design phase, while existing, operating facilities are covered by Performance Indicator 2B and closed facilities/mining sites by Performance Indicator 2C.

**PERFORMANCE INDICATOR 2A**

**MINE CLOSURE PLANNING AT THE PROJECT DESIGN STAGE**

**Purpose:**

To confirm that the company has a closure plan and practices in place suitable for a mining project in the design phase. The closure plan provides a systematic structure for the assessment of risks, setting of goals and objectives, consultation with communities of interest, implementing activities to achieve goals, assignment of responsibilities, and assurance processes.

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| **Performance Indicator 2A**  **Mine Closure Planning and Management System Based on the Mine Life Cycle Mine Closure Planning at the Project Design Stage**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | Activities meet the requirements set in Finnish legislation.  The site  (1) has not developed or implemented a mine closure plan and the related measures as part of mine life cycle management, or  (2) has a mine closure plan in place meeting the minimum legislative requirements (e.g. a plan describing the general principles of mine closure included in the EIA or a mine closure plan as required for a permit application at the permit application stage).  If the project planning has reached a stage which requires that the collateral required by the Environmental Protection Act and the Mining Act be determined, the estimates for the collateral to be deposited, including the grounds thereof, are in place. |
| **B** | A mine closure plan has been developed, at a level of detail appropriate to the stage of project development in question.   * The plan defines the objectives of mine closure and outlines the means of achieving those objectives. * The definition of the objectives is based on the procedures of environmental impact assessment and risk assessment presented in the *Handbook for Mine Closure* (Chapter 4). In addition, the closure plan includes the necessary studies in accordance with the guidance provided in the *Handbook for Mine Closure* (Chapter 5). Such studies can be prepared as part of other baseline reports developed for the mining project. * Responsibility for mine closure is assigned to certain people in the project organisation, but their responsibilities are not clearly defined in the plan. * Key communities of interest have been named and identified, but there has been no communication with them relating to the closure plan. |

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| **A** | In addition to the above, the mine closure plan includes the following:   * The mine closure plan has been developed and/or reviewed in consultation with communities of interest. Practices and processes such as those described in the set of tools for community outreach are applied to community of interest communications. * The closure plan includes detailed descriptions of those responsible for the closure and their roles and responsibilities within the project organisation. * The closure plan also considers temporary mine closure scenarios and includes a Care and Maintenance Plan for such situations. |
| **AA** | Risk assessments have been implemented in preparing the mine closure plan, which covers the management of long-term risks and liabilities. At a minimum, the principles of mine closure applied in the plan correspond to the requirements of BAT[[2]](#footnote-2). The plan has studied, and where possible taken account of, new and/or emerging technologies and techniques, or these are taken into consideration when the plan is updated.  The closure plan is effectively integrated with other plans, and their updates, related to the project.  The closure plan has been verified through an internal audit. |
| **AAA** | In addition to the above, the mine closure plan takes account of the impacts of mine closure on the surrounding community and outlines measures that could be taken to minimise any adverse socio-economic impacts of mine closure.  The closure plan has been verified through an external audit. |

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| **Mine Closure Planning and Management System Based on the Mine Life Cycle**  **Mine Closure Planning at the Project Design Stage**  **FREQUENTLY ASKED QUESTIONS**   |  |  |  | | --- | --- | --- | | **No. in APPX. 1.** | **FAQ** | **PAGE** | | [3](#_bookmark13) | [What does COI consultation mean?](#_bookmark14) | [See page 1](#_bookmark13)5 | | [4](#_bookmark16) | [Can a site have an effective closure plan covering the entire mine life cycle,](#_bookmark17) [without having a mine closure policy in place?](#_bookmark17) | See page 15 | | [5](#_bookmark18) | [What does “audit or assessment” mean?](#_bookmark19) | [See page 1](#_bookmark18)6 | | [6](#_bookmark20) | [Can a company or site/facility achieve a Level of AAA upon the satisfactory completion of an](#_bookmark21) [external audit or assessment, without having completed a Level AA internal audit or](#_bookmark21) [assessment?](#_bookmark21) | [See page 1](#_bookmark20)6 | | [7](#_bookmark24) | [What is a community of interest (COI)?](#_bookmark25) | [See page 1](#_bookmark24)6 | | 8 | [What is a “system”?](#_bookmark31) | See page 17 | | 10 | What does “BAT” (best available technology or best available techniques) mean? | See page 17 | | 11 | What does “Care and Maintenance situation” mean? | See page 17 |   **Mine Closure Planning and Management System Based on the Mine Life Cycle**  **Mine Closure Planning at the Project Design Stage**  **SUPPORTING GUIDELINES FOR THE ASSESSOR**  Through interviews and the review of documentation, clarify the following issues:   * That a mine closure plan covering the entire mine life cycle is in place that is in conformance with the mine closure framework presented in the *Handbook for Mine Closure*. * That there has been consultation with communities of interest on developing and/or reviewing the closure plan. * That the closure plan is reviewed annually to ensure that it remains current and effective – and that the reviews are reported to senior management. * What audit or assessment processes are in place to ensure that the closure plan is in conformance with the mine closure framework presented in the *Handbook for Mine Closure*. * Whether an internal or external audit or assessment of the mine closure plan has been carried out within the last three years.   **Mine Closure Planning and Management System Based on the Mine Life Cycle**  **SUPPORTING GUIDELINES**  Through interviews and the review of documentation, clarify the following issues:   * That there is a mine closure plan covering the entire mine life cycle in place that is in conformance with the mine closure framework presented in the *Handbook for Mine Closure*. * That there has been consultation with communities of interest on developing and/or reviewing the closure plan. * That the closure plan is reviewed annually to ensure that it remains current and effective – and that the reviews are reported to senior management. * What audit or assessment processes are in place to ensure that the closure plan is in conformance with the mine closure framework presented in the *Handbook for Mine Closure*. * Whether an internal or external audit or assessment of the mine closure plan has been carried out within the last three years. |

**PERFORMANCE INDICATOR 2B**

**PROGRESSIVE MINE CLOSURE AND ASSIGNED ACCOUNTABILITY FOR MINE CLOSURE**

**Purpose:**

To confirm that existing, operating mines have a closure plan and management system in place suitable for a mining project at the construction or operating stage and for progressive mine closure. The closure plan for this stage also includes the information included in the plan for the previous stage (2A).

For operating mines, it is essential that accountability for mine closure is clearly defined. This indicator confirms that companies have an executive officer who has overall accountability for ensuring that an appropriate closure plan is in place. It is expected that the executive officer will delegate responsibility for the implementation of the closure plan, budgetary issues and other closure-related measures to production and/or corporate personnel, while retaining ultimate accountability for the closure of the mine and its outcomes.

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| **Performance Indicator 2B**  **Mine Closure Planning and Management System Based on the Mine Life Cycle**  **Progressive Mine Closure and Assigned Accountability for Mine Closure**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | A mine closure plan is in place that meets the requirements set in legislation and the environmental permit and describes the principles for progressive mine closure and post-closure monitoring. The closure plan is updated in accordance with the requirements set in the environmental permit. Collateral for mine closure has been determined in accordance with the Environmental Protection Act and the Mining Act. In addition, the company has made provisions in its business operations for the cost effects of the closure plan’s implementation. This is typically carried out by including annual reserves or provisions for mine closure in the balance sheet.  No formal assignment of accountability for mine closure to an executive officer. No formal delegation of responsibility for mine closure and the implementation of the closure plan. |
| **B** | In addition to the above, the mine closure plan includes the following elements:   * The plan takes account of the principles of mine closure implementation and post-closure monitoring presented in the *Handbook for Mine Closure* (Chapters 6 and 7). * The company is committed to the progressive implementation of the closure plan in so far as possible. * Formal assignment of accountability for mine closure to an executive officer. No formal delegation of responsibility for mine closure and the implementation of the closure plan. * Key communities of interest have been named and identified, but there has been no communication with them relating to the closure plan. |
| **A** | The mining company has identified and assessed the risks associated with the temporary closure of the mine and the permanent termination of mining activities:   * The mine closure plan has been developed and/or reviewed in consultation with communities of interest (including a post-closure communications plan). Practices and processes such as those described in the set of tools for community outreach are applied to community of interest communications[[3]](#footnote-3). * Mine closure measures are implemented progressively in accordance with the closure plan. * In addition to the normal monitoring programme, the closure plan includes indicators that are monitored to assess the effectiveness and success of closure measures. * The closure plan is regularly updated on a more frequent basis than required by the environmental permit, and the views of communities of interest are taken into account in the updates. * Accountability for mine closure is formally assigned to an executive officer. Responsibility, budgetary authority and accountability for the implementation of, and reporting on, the closure plan are formally delegated to production and/or corporate personnel.   The closure plan provides for the temporary closure of the mine and includes a Care and Maintenance plan, the scope of which meets the requirements of operational mining activities in such situations. |
| **AA** | In the preparation and implementation of the closure plan, special attention is paid to risk management and the management of long-term risks and liabilities. At a minimum, the principles of mine closure applied in the plan correspond to the requirements of BAT[[4]](#footnote-4). Where possible, the plan takes account of new and/or emerging technologies and techniques, or these are taken into consideration when the plan is updated and the closure measures are implemented. The closure plan is effectively integrated with other plans, and their updates, related to the project.  The closure plan has been formally verified through an internal, independent audit. |
| **AAA** | A pioneering approach has been demonstrated through the active development or application of new technologies and/or techniques if it can be established with certainty that they improve the outcome of closure measures. The results of such activities are shared with other companies in order to improve best practices.  In addition to the above, the mine closure plan takes account of the impacts of mine closure on the surrounding community and presents measures which are more detailed than those under Performance Indicator 2A and that could be taken to minimise any adverse socio-economic impacts of mine closure. With respect to communities of interest, communication with the municipality plays a key role in solving any issues relating to restructuring, where possible. In addition, the company management is committed to these measures, and the related, even long-term, costs have been taken into account in budget allocation.  The closure plan has been formally verified through an external, independent audit. |

**Mine Closure Planning and Management System Based on the Mine Life Cycle**

**Progressive Mine Closure and Assigned Accountability for Mine Closure**

**FREQUENTLY ASKED QUESTIONS**

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**PERFORMANCE INDICATOR 2C**

**MINE CLOSURE AND POST-CLOSURE ACTIVITIES**

**Purpose:**

To confirm that companies have a closure plan and management system in place that is suitable for the closure and post-closure stages. The company must actively implement its closure plan and ensure that the closure measures work as planned and meet the objectives set in the closure plan. It should be noted that some of the assessment criteria are strongly time-dependent, as it may take several years before the effectiveness of some of the closure measures can be established with certainty (e.g. the development of vegetation in areas to be covered). After the completion of the closure measures has been accepted, the collateral deposited for closure can be released.

NB: This performance indicator only applies to facilities with permanently closed structures relating to mining activities (e.g. a closed tailings pond or part thereof, a satellite quarry or similar). This performance indicator focuses on the implementation of the measures presented in the closure plan after the mining activities at the site have ceased.

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| **Performance Indicator 2C**  **Mine Closure Planning and Management System Based on the Mine Life Cycle**  **Mine Closure and Post-closure Activities**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | An appropriate closure plan in place, possibly partly or fully implemented. However, the large scale implementation of the closure plan has not yet necessarily begun, as the mining activity has only just ceased (and closure measures have not yet been started). Activities meet the requirements set in Finnish legislation and the environmental permit. |
| **B** | The implementation of the closure plan has been started, or the closure measures have been completed in accordance with the plan, and post-closure monitoring has been begun in accordance with the monitoring programme. |
| **A** | Mine closure measures are being implemented or have been completed in accordance with the closure plan. In addition:   * Continuous improvement and risk management practices are applied in the implementation of the closure plan, in order to achieve a better outcome. * In addition to the normal environmental monitoring programme, the effectiveness of the closure measures at the mine is monitored in accordance with the performance indicators defined in the closure plan. * If a long-term Care and Maintenance situation is required, the company can demonstrate that sufficient resources are available to manage the situation appropriately. * The necessary documentation and monitoring results relating to the implementation of the closure are compiled and filed appropriately. * Community of interest communications are carried out in accordance with a defined plan during and after the implementation of the closure. |
| **AA** | The closure measures have been completed in accordance with the closure plan. At a minimum, the principles of mine closure applied in the implementation of the closure plan correspond to the requirements of BAT[[5]](#footnote-5). Where possible, new and/or emerging technologies and techniques have been applied to the implementation of the closure plan. These are described in the plan or have been introduced during the closure.  The closure measures have been formally verified through an internal, independent audit. |
| **AAA** | The closure measures have been completed in accordance with the closure plan. The company can demonstrate that the objectives of mine closure presented in the closure plan have been achieved in all respects. In addition, the harm reduction measures or compensation procedures relating to the surrounding community mentioned in the closure plan, or similar more extensive measures, have been implemented or are being implemented.  The closure measures have been formally verified through an external, independent audit. |

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**Mine Closure Planning and Management System Based on the Mine Life Cycle**

**Mine Closure and Post-closure Activities**

**FREQUENTLY ASKED QUESTIONS**

**Mine Closure Planning and Management System Based on the Mine Life Cycle**

**Mine Closure and Post-closure Activities**

**SUPPORTING GUIDELINES FOR THE ASSESSOR**

Through interviews and the review of documentation, clarify the following issues:

* That a mine closure plan covering the entire mine life cycle is in place that is in conformance with the mine closure framework presented in the *Handbook for Mine Closure*.
* That there has been consultation with communities of interest on developing and/or reviewing the closure plan.
* That the closure plan is reviewed annually to ensure that it remains current and effective – and that the reviews are reported to senior management.
* What audit or assessment processes are in place to ensure that the closure plan is in conformance with the mine closure framework presented in the *Handbook for Mine Closure*.
* Whether an internal or external audit or assessment of the mine closure plan has been carried out within the last three years.

**PERFORMANCE INDICATOR 3**

**REPORTING ON MINE CLOSURE MEASURES**

**Purpose:**

To confirm that there is an annual corporate review as part of other reporting on the closure plan or its implementation. The results are reported to the accountable executive officer to ensure that the corporation is satisfied that the closure plan and the measures taken to implement it are effective and continue to meet the needs of the organisation.

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| **Performance Indicator 3**  **Reporting on Mine Closure Measures**  **ASSESSMENT CRITERIA** | |
| **Level** | **Criteria** |
| **C** | The updates and implementation of plans related to mine closure are reported in accordance with the requirements set in legislation (normal annual reporting).  The amounts of collateral for mine closure deposited by the company are presented in the decisions made by authorities.  However, there is no separate formal, annual review of the activities, or if there is, this is not reported to the accountable executive officer. |
| **B** | The results of the formal annual review of mine closure are reported to the accountable executive officer. Reporting includes a summary of the most recent closure plan and/or the implementation of closure measures, risk management and monitoring results related to closure (if monitoring is under way). In addition, any updates of collateral for mine closure are reported publicly. |
| **A** | The results of the formal annual review of mine closure are reported to the accountable executive officer in the same way as at Level B.  Reporting forms an integral part of external and community of interest communications. Reporting includes information on the collateral for mine closure deposited by the company and any collateral updates, as well as information on the reserves and provisions relating to closure measures entered in the balance sheet of the company.  As part of community of interest communications, feedback is sought on various activities and used in their continuous improvement.  Communications are open and reporting is public. |
| **AA** | In addition to the elements presented at the previous levels, the stage-specific assessment criteria for Level AA presented under Performance Indicator 2A, 2B or 2C (in accordance with the stage reached in the mining project) and the progress achieved towards the related objectives set are included in reporting.  Reporting has been verified through an internal audit. |
| **AAA** | In addition to the elements presented at the previous levels, the stage-specific assessment criteria for Level AAA presented under Performance Indicator 2A, 2B or 2C (in accordance with the stage reached in the mining project) and their fulfilment are included in reporting.  Reporting has been verified through an external, independent audit. |

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| **Reporting on Mine Closure Measures**  **FREQUENTLY ASKED QUESTIONS** | | |
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**Reporting on Mine Closure Measures**

**SUPPORTING GUIDELINES FOR THE ASSESSOR**

Through interviews and the review of documentation, clarify the following issues:

* That the company performs an annual corporate review of mine closure and the implementation of mine closure measures.
* That the results of the review are reported to the accountable executive officer.
* That the process employed for the annual corporate review of mine closure addresses the requirements of the mine closure framework presented in the *Handbook for Mine Closure*.
* That the annual corporate review of mine closure reported to the accountable executive officer has been subject to an internal or external audit within the last three years.

**APPENDIX 1:**

**Assessing Mine Closure Performance**

**FREQUENTLY ASKED QUESTIONS**

|  |  |  |
| --- | --- | --- |
| [1](#_bookmark9) | [Does a “mine closure policy” have to be a stand-alone document?](#_bookmark10) | See page 1[5](#_bookmark8) |
| [2](#_bookmark11) | [Can corporate documentation be used to demonstrate commitment?](#_bookmark12) | [See page 1](#_bookmark11)5 |
| [3](#_bookmark13) | [What does COI consultation mean?](#_bookmark14) | [See page 1](#_bookmark13)5 |
| 4 | Can a site have an effective closure plan covering the entire mine life cycle, without having a mine closure policy in place? | [See page 1](#_bookmark13)5 |
| [5](#_bookmark18) | [What does “audit” mean?](#_bookmark19) | [See page 1](#_bookmark18)6 |
| [6](#_bookmark20) | [Can a company or site/facility achieve a Level of AAA upon the satisfactory completion of an](#_bookmark21) [external audit, without having completed a Level AA internal audit](#_bookmark21)? | [See page 1](#_bookmark20)6 |
| [7](#_bookmark24) | [What is a community of interest (COI)?](#_bookmark25) | [See page 1](#_bookmark24)6 |
| 8 | What is a system? | [See page 1](#_bookmark20)7 |
| 9 | What do “accountability” and “responsibility” mean? | See page 17 |
| 10 | What does “BAT” (best available technology or best available techniques mean? | See page 17 |
| 11 | What does “Care and Maintenance situation” mean? | See page 17 |

1. **Does a “mine closure policy” have to be a stand-alone document?**

No. The policy can be incorporated into an overarching corporate policy or environmental policy if such a policy includes specific reference to mine closure.

1. **Can corporate documentation be used to demonstrate commitment?**

A written senior management commitment at corporate level can be accepted as evidence during a corporate and/or site- or facility-level self-assessment or verification of the Finnish TSM standard, if accompanied by evidence that the corporate commitment is being applied and adhered to at site/facility level. There must be evidence of a link between the corporate documentation and site- or facility-level practices. If this linkage is established, then the corporate documentation can be accepted as evidence of corporate and/or site- or facility-level commitment.

### What does COI consultation mean?

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

### Can a site have an effective closure plan covering the entire mine life cycle, without having a mine closure policy in place?

No. A site must have a mine closure policy in place in order to effectively implement a closure, since the policy provides a direction and forms part of the management system.

1. **What does “audit” mean?**

An audit is a systematic and documented independent assessment to determine whether the requirements of audited entity are met. The audit findings and conclusions are based only on the evidence. Audits are voluntary but are required to reach levels AA and AAA.

Internal audits can be conducted by employees of the company with appropriate knowledge and competencies who are independent, impartial and objective with respect to the matter being evaluated. External audits are conducted by an independent and objective person or group, such an independent consultant. The audits are valid for three (3) years.

This should not be confused with the verification system, which is – largely a desk-top exercise in which the TSM rating self-assigned by a facility or company against a given indicator is verified. The TSM verification is not equivalent to an audit, as outlined in the preceding paragraph, which is more detailed than verification.

### Can a company or site/facility achieve a Level of AAA upon the satisfactory completion of an external audit or assessment, without having completed a Level AA internal audit or assessment?

Yes. A company or site/facility does not need to perform an internal audit (qualifying for a rating of Level AA) before receiving a rating of Level AAA for an external audit.

1. **What is a community of interest (COI)?**

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

* + employees
  + neighbours
  + landowners
  + recreational users of the affected area
  + the Sámi (the village meeting of the Skolt Sámi in the Skolt Sámi area)[[6]](#footnote-6)
  + reindeer herding co-operatives and reindeer herders[[7]](#footnote-7)
  + mining community members
  + suppliers
  + representatives of other livelihoods
  + customers
  + contractors
  + environmental organisations and other non-governmental organisations
  + governments, authorities
  + the financial community, and
  + shareholders.

### 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 in order to achieve specified objectives and drive continual improvement in performance. A systems approach requires an assessment of what needs to be done, planning in order to achieve the set objectives, the implementation of the plan, and a review of performance in meeting the objectives. A management system also considers any personnel and resource requirements and how the documentation required for the system’s implementation will be created. The documentation covers all types of documentation (paper documents, intranet documents, electronic documents, etc.). Not all practices need to be documented. Within any system, processes and activities are usually given a certain status through clear and precise requirements that are documented as a written procedure, for example. This means that the company can clearly and easily demonstrate that the process or system in question is in place. This would also typically require documented processes or an “audit trail”.

Other definitions associated with systems are:

* Policy/Commitment: The formal expression of the management’s commitment to a particular set of issues that presents the stance of the company with respect to interested external parties. A commitment can be expressed as part of the operational principles or policy of a company.
* Practice: Informal, undocumented approaches to carrying out a task.
* Procedure: A formalised, documented description of how a task is to be carried out.

### What do “accountability” and “responsibility” mean?

Accountability: The management is the party that is ultimately answerable for mine closure management and for the development and implementation of mine closure. Such accountability cannot be delegated. Resources are available to the accountable party to ensure that proper systems (training, equipment, communications etc.) are in place for effectively meeting the mine closure goals.

Responsibility: Within the mine closure management system, specific mine closure related requirements and tasks are identified and assigned to specific positions within the facility. It is important that responsibilities are clearly communicated so that the person in each position understands what is expected of him or her.

**10. What does “BAT” (best available technology or best available techniques) mean?**

The technology or technique that best minimises the environmental impacts of the facility. The best available techniques are described in the Best Available Techniques Reference Documents (BREFs) issued by the EU.

**11. What does “Care and Maintenance situation” mean?**

A situation in which production at the mine has been temporarily discontinued, but may be continued later. Despite the temporary discontinuation, the area is still managed to ensure safe and stable conditions.

# APPENDIX 2: SELF-ASSESSMENT CHECKLIST

# Mine Closure

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| --- | --- | --- | --- |
| **Facility/ Site:** |  | **Company:** |  |
| **Assessed by:** |  | **Date submitted:** |  |

|  |  |
| --- | --- |
| **SUPPORTING DOCUMENTATION/EVIDENCE:** | |
| **NAME OF DOCUMENT** | **LOCATION** |
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| **Interviewees:** | | | |
| **NAME** | **POSITION** | **NAME** | **POSITION** |
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| --- | --- | --- | --- | --- | --- |
|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 1: MINE CLOSURE POLICY AND OPERATIONAL GUIDELINES** | | | | | |
| **Indicator 1  Level B** | Are a mine closure policy and operational guidelines in place? |  |  |  |  |
| *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, the site is a Level C site.* | | | | |
| **Indicator 1  Level A** | Are a mine closure policy and operational guidelines in place that are in conformance with the guiding principles of the Finnish towards sustainable mining standard? |  |  |  |  |
| Were the policy and the operational guidelines developed and/or reviewed in consultation with communities of interest? |  |  |  |  |
| Are the policy and the operational guidelines endorsed by senior management? |  |  |  |  |
| Are the policy and the operational guidelines implemented with a budget allocation? |  |  |  |  |
| *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, the site is a Level B site.* | | | | |
| **Indicator 1  Level AA** | Do the principles of mine closure correspond, at a minimum, to the requirements of BAT? |  |  |  |  |
| Is the site committed to studying and applying emerging technologies and techniques and to ensuring their reliability? |  |  |  |  |
| Has an internal audit been conducted to confirm that the content and implementation of policy and operational guidelines are in conformance with the Finnish towards sustainable mining standard? |  |  |  |  |
| *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, the site is a Level A site.* | | | | |
| **Indicator 1  Level AAA** | Do the policy and the operational guidelines take account of the impacts of mine closure on the surrounding community? |  |  |  |  |
| Is the site seeking measures to minimise any adverse socio-economic impacts of mine closure? |  |  |  |  |
| Has an external, independent audit been conducted to confirm that the content and implementation of policy and operational guidelines are in conformance with the Finnish towards sustainable mining standard? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the site is a Level AAA site. If you have not answered “Yes” to all of the Level AAA questions, the site is a Level AA site.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 1** | | | | **Level:** |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2A: MINE CLOSURE PLANNING AT THE PROJECT DESIGN STAGE** | | | | | |
| **Indicator 2A Level B** | Does the mine closure plan include the following elements:   * The plan defines the objectives of mine closure and outlines the means of achieving those objectives. * The definition of objectives is based on the procedures of environmental impact assessment and risk assessment presented in the *Handbook for Mine Closure* (Chapter 4). In addition, the closure plan includes the necessary supporting studies in accordance with the guidance provided in the *Handbook for Mine Closure* (Chapter 5). Such studies can be prepared as part of other baseline reports developed for the mining project. * Responsibility for mine closure is assigned to certain people in the project organisation, but their responsibilities are not clearly defined in the plan. * Key communities of interest have been named and identified, but there has been no communication with them relating to the closure plan. |  |  |  |  |
| *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, the site is a Level C site.* | | | | |
| **Indicator 2A Level A** | In addition to the Level B elements, does the mine closure plan include the following elements:   * The mine closure plan has been developed and/or reviewed in consultation with communities of interest. Practices and processes such as those described in the set of tools for community outreach are applied to community of interest communications. * The closure plan includes detailed descriptions of those responsible for the closure and their roles and responsibilities within the project organisation. * The closure plan also considers temporary mine closure scenarios and includes a Care and Maintenance Plan for such situations. |  |  |  |  |
| *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, the site is a Level B site.* | | | | |

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| **Indicator 2A Level AA** | Does the closure plan include methods for risk management and the management of long-term risks and liabilities? |  |  |  |  |
| Do the principles of mine closure applied in the plan correspond, at a minimum, to the requirements of BAT? |  |  |  |  |
| Has the plan taken account of new and/or emerging technologies and techniques, or are these taken into consideration when the plan is updated? |  |  |  |  |
| Is the closure plan integrated with other plans, and their updates, related to the project? |  |  |  |  |
| Has the closure plan been verified through an internal audit? |  |  |  |  |
| *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, the site is a Level A site.* | | | | |
| **Indicator 2A Level AAA** | In addition to the above, does the closure plan:   * take account of the impacts of mine closure on the surrounding community? * outline measures for minimising any adverse socio-economic impacts of mine closure?   Has the closure plan been formally verified through an external, independent audit? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the site is a Level AAA site. If you have not answered “Yes” to all of the Level AAA questions, the site is a Level AA site.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 2A** | | | | **Level:** |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2B: PROGRESSIVE MINE CLOSURE AND ASSIGNED ACCOUNTABILITY FOR MINE CLOSURE** | | | | | |
| **Indicator 2B Level B** | Does the mine closure plan include the following elements:   * The plan takes account of the principles of mine closure implementation and post-closure monitoring presented in the *Handbook for Mine Closure* (Chapters 6 and 7). * The company is committed to the progressive implementation of the closure plan in so far as possible. * Formal assignment of accountability for mine closure to an executive officer. No formal delegation of responsibility for mine closure and the implementation of the closure plan. * Key communities of interest have been named and identified, but there has been no communication with them relating to the closure plan. |  |  |  |  |
| *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, the site is a Level C site.* | | | | |

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| **Indicator 2B Level A** | In addition to the Level B elements, does the mine closure plan include the following elements:   * The mine closure plan has been developed and/or reviewed in consultation with communities of interest (including a post-closure communications plan), and is being implemented. |  |  |  |  |
| * Mine closure measures are implemented progressively in accordance with the closure plan. |  |  |  |  |
| * In addition to the normal monitoring programme, the closure plan includes indicators that are monitored in order to assess the effectiveness and success of closure measures. |  |  |  |  |
| * The closure plan is regularly updated on a more frequent basis than required by the environmental permit and, where possible, the views of communities of interest are taken into account in the updates. |  |  |  |  |
| * Accountability for mine closure is formally assigned to an executive officer. Responsibility, budgetary authority and accountability for the implementation of, and reporting on, the closure plan are formally delegated to production and/or corporate personnel. |  |  |  |  |
| * The closure plan provides for the temporary closure of the mine and includes a Care and Maintenance plan, the scope of which meets the requirements of operational mining activities in such situations. |  |  |  |  |
| *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, the site is a Level B site.* | | | | |

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| **Indicator 2B Level AA** | Does the closure plan include methods for risk management and the management of long-term risks and liabilities? |  |  |  |  |
| Do the principles of mine closure applied in the plan correspond, at a minimum, to the requirements of BAT? |  |  |  |  |
| Has the plan taken account of new and/or emerging technologies and techniques, or are these taken into consideration when the plan is updated? |  |  |  |  |
| Is the closure plan integrated with other plans, and their updates, related to the project? |  |  |  |  |
| Has the closure plan been verified through an internal audit? |  |  |  |  |
| *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, the site is a Level A site.* | | | | |
| **Indicator 2B Level AAA** | Has a pioneering approach been demonstrated through the active development or application of new technologies and/or techniques if it can be established with certainty that they improve the outcome of closure measures? |  |  |  |  |
| Are the results of the above-mentioned activities shared with other companies in order to improve best practices? |  |  |  |  |
| In addition to the above, does the mine closure plan take account of the impacts of mine closure on the surrounding community and present any measures, more detailed than those under Performance Indicator 2A, which could be taken to minimise any adverse socio-economic impacts of mine closure? |  |  |  |  |
| Has there been communication with the municipality in order to solve any issues  relating to restructuring, where possible? |  |  |  |  |
| Is the company management committed to these measures relating to restructuring, and have the related, even long-term, costs been taken into account in budget allocation? |  |  |  |  |
| Has the closure plan been formally verified through an external, independent audit? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the site is a Level AAA site. If you have not answered “Yes” to all of the Level AAA questions, the site is a Level AA site.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 2B** | | | | **Level:** |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2C: MINE CLOSURE AND POST-CLOSURE ACTIVITIES** | | | | | |
| **Indicator 2C  Level B** | Has the implementation of the mine closure plan been started, or have the closure measures been completed in accordance with the plan and has post-closure monitoring been begun in accordance with the monitoring plan? |  |  |  |  |
| *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, the site is a Level C site.* | | | | |
| **Indicator 2C  Level A** | Are mine closure measures being implemented or have they been completed in accordance with the closure plan, and in addition:   * Are continuous improvement and risk management practices applied in the implementation of the closure plan in order to achieve a better outcome? * In addition to the normal environmental monitoring programme, is the effectiveness of the closure measures at the mine monitored in accordance with the performance indicators defined in the closure plan? * If a long-term Care and Maintenance situation is required, can the company demonstrate that sufficient resources are available to manage the situation appropriately? * Are the necessary documentation and monitoring results relating to the implementation of the closure compiled and filed appropriately? * Are community of interest communications carried out in accordance with a defined plan during and after the implementation of the closure? |  |  |  |  |
| *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, the site is a Level B site.* | | | | |

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| **Indicator 2C  Level AA** | Have the closure measures been completed in accordance with the closure plan? |  |  |  |  |
| Do the principles of mine closure applied in the plan correspond, at a minimum, to the requirements of BAT? |  |  |  |  |
| Has the implementation taken account of new and/or emerging technologies and techniques, or are these taken into consideration when the plan is updated? |  |  |  |  |
| Has the implementation of mine closure activities been formally verified through an internal audit? |  |  |  |  |
| *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, the site is a Level A site.* | | | | |
| **Indicator 2C Level AAA** | Can the company demonstrate that the objectives of mine closure presented in the closure plan have been achieved in all respects? |  |  |  |  |
| Have the harm reduction measures or compensation procedures relating to the surrounding community mentioned in the closure plan, or similar more extensive measures, been implemented, or are they being implemented? |  |  |  |  |
| Has the implementation of mine closure activities been formally verified through an external, independent audit? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the site is a Level AAA site. If you have not answered “Yes” to all of the Level AAA questions, the site is a Level AA site.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 2C** | | | | **Level:** |

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| --- | --- | --- | --- | --- | --- |
|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 3: REPORTING ON MINE CLOSURE MEASURES** | | | | | |
| **Indicator 3  Level B** | Are the results of the formal annual review of mine closure reported to the accountable executive officer, including a summary of:   * the most recent closure plan and/or the implementation of closure measures * risk management * monitoring results? |  |  |  |  |
| Are updates of collateral for mine closure reported publicly? |  |  |  |  |
| *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, the site is a Level C site.* | | | | |
| **Indicator 3  Level A** | Does reporting form an integral part of external and community of interest communications? |  |  |  |  |
| Does reporting include information on the collateral for mine closure deposited by the company and any collateral updates, as well as information on the reserves and provisions relating to closure measures entered in the balance sheet of the company? |  |  |  |  |
| Is feedback on activities sought as part of community of interest communications, and is such information used in the continuous  improvement of activities? |  |  |  |  |
| *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, the site is a Level B site.* | | | | |
| Are the stage-specific assessment criteria for Level AA presented under Performance Indicator 2A, 2B or 2C (in accordance with the stage reached in the mining project) and the progress achieved towards the related objectives included in reporting? |  |  |  |  |
| Has reporting been verified through an internal audit? |  |  |  |  |
| *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, the site is a Level A site.* | | | | |
| Are the stage-specific assessment criteria for Level AAA presented under Performance Indicator 2A, 2B or 2C (in accordance with the stage reached in the mining project) and their fulfilment included in reporting? |  |  |  |  |
| Has reporting been verified through an external audit? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AAA questions, the site is a Level AAA site. If you have not answered “Yes” to all of the Level AAA questions, the site is a Level AA site.* | | | | |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 3** | | | | **Level:** |

**USEFUL REFERENCES**

Kaivoksen sulkemisen käsikirja (English abstract: Handbook for Mine Closure) (2005). With respect to technical aspects, the guide is still applicable to closure planning and mine life cycle management.

Metallimalmikaivostoiminnan parhaat ympäristökäytännöt (English abstract: Best environmental practices in metal mining operations) (2011)

BREF: Management of Waste from Extractive Industries 2018

1. BREF: Management of Waste from Extractive Industries 2018 [↑](#footnote-ref-1)
2. BREF: Management of Waste from Extractive Industries 2018 [↑](#footnote-ref-2)
3. Set of tools for community outreach, available in Finnish at [www.kaivosvastuu.fi](http://www.kaivosvastuu.fi) [↑](#footnote-ref-3)
4. BREF: Management of Waste from Extractive Industries 2018 [↑](#footnote-ref-4)
5. BREF: Management of Waste from Extractive Industries 2018 [↑](#footnote-ref-5)
6. The Sámi are represented by the Sámi Parliament in national and international issues; in addition, in the Skolt Sámi area, the Skolt Sámi are represented by the village meeting of the Skolt Sámi. [↑](#footnote-ref-6)
7. In the reindeer herding area, the reindeer herders in the area are represented by the relevant reindeer herding co-operative. [↑](#footnote-ref-7)