# ITSCI PROGRAMME INCIDENT AND OUTCOME REVIEW

November 2019-October 2020

# Executive Summary

This report gives an overview of the success of stakeholders working with the ITSCI Programme to achieve risk mitigation relating to mineral supply chains from Burundi, the Democratic Republic of the Congo (DRC), Rwanda and Uganda during the twelve-month period 1st November 2019 to 31st October 2020.

The ITSCI Programme has extensive experience supporting companies, governments and civil society in the identification and mitigation of risks associated with 3T minerals supply chains. Our standards are independently confirmed to be 100% aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and we support companies performing due diligence according to those expectations. Our on-the-ground teams supplement traceability with an incident management system to identify and verify risks, as a critical aspect of due diligence. We communicate these along the supply chain, recommend mitigation actions, and facilitate the discussion of mitigation among local stakeholders. In addition, we follow up and report on the progress of mitigation.

Salient indicators of ITSCI Programme implementation during the reporting period 1st November 2019 to 31st October 2020 are given in Table 1.

**Table 1. Salient indicators of the ITSCI Programme**

| INDICATORS | 2019 | 2020 |
|---|---|---|
| Monitored mine sites | 2,201 | 2,330 |
| On the ground visits per month | 690 | 520* |
| Mineral transactions | 650,000 | 560,000 |
| Whistle-blower calls | 450 | 1,175 |
| Incidents opened | 1,492 | 1,338 |

*Average

Of the 1,338 incidents opened, 117 were categorised as Level 1 seriousness with potential association with human rights abuses, the involvement of non-state armed groups, or illegal taxation or involvement in mineral business by rogue individuals of state armed groups. Of the 117 Level 1 incidents, 9 were categorised as High Risk, with relevance for U.S. Securities and Exchange Commission reporting. To date all the High Risk incidents are under mitigation and monitoring. The total number of whistle-blower calls increased significantly in the reporting period. The increase can be associated with an increase in the number of community radio stations and broadcasting spots, which likely resulted in increased listenership and calls. The increase can additionally be likely related to greater community interest in COVID-19 and ITSCI's awareness-raising campaign to facilitate preventing transmission.

To facilitate resolution of incidents, ITSCI supported local multi-stakeholder meetings for 45 committees and conducted 435 training sessions with approximately 7,408 beneficiaries. As a result, across all incidents and ITSCI areas the overall rate of resolution of incidents remained high at 79% in the reporting period 1st November 2019 to 31st October 2020.

ITSCI has 32 indicators of outcomes from incident management (Annex 1), which for the purpose of simplification are aggregated into 7 categories. The proportion of major outcomes for incidents is given in Table 2.

**Table 2. Major outcomes from incident management**

| AGGREGATED OUTCOMES | 2019 | 2020 |
|---|---|---|
| Due Diligence Improvements | 48% | 46% |
| Governance and Security Improvements | 12% | 13% |
| Awareness-Raising and Mediation | 12% | 14% |
| Human Rights/Health and Safety Risk Mitigation | 4% | 4% |
| Mine/Company/Mineral Suspension or Seizure | 2% | 2% |
| Incident Unsubstantiated | 6% | 6% |
| Incident Unresolved | 16% | 15% |

Overall, the outcomes of incident management are similar to the previous reporting period. As a result of improved engagement, training and reporting, some improvements were observed in Governance and Security and Awareness-Raising and Mediation. Improvements in Due Diligence decreased slightly from that in the previous period.

COVID-19 impacted incidents in the reporting period. In general, the movement and gathering of people in meetings to address incidents was reduced and sometimes temporarily suspended for various months. These restrictions were caused by lockdowns, border closures and suspension of air travel introduced by governments in the Great Lakes Region. Our field teams were reduced, resulting in less capacity to visit sites, follow up on and monitor of incidents through on-the-ground stakeholder engagement. ITSCI prioritised on high risk incidents during this period in order to maintain OECD standards. However, understanding the impact of the pandemic on incidents and establishing trends is highly complex and requires access to full ITSCI information which is not available in this report.

In 2020, downstream companies donated to the ITSCI COVID fundraising campaign, raising a total $75k. The funds contributed towards rebuilding field activities and on-the-ground presence; recognizing that is through local personnel that ITSCI is able to report and follow up on incidents and engage stakeholders in verification and resolution. Further information can be obtained on the ITSCI website and by companies contributing to the continued progress and financing of the ITSCI programme.

# CONTENTS

# INTRODUCTION AND SCOPE

The ITSCI Programme assists companies to implement the recommendations of the **OECD Due Diligence Guidance** for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas through the provision of supply chain traceability, identification of risks, facilitation of risk resolution, due diligence training and various forms of independent evaluation. This support for stakeholders enables 3T supply chains to trade responsibly and avoid financing of conflict or support to human rights abuses, as well as to respond to other identified risks. ITSCI is unique among supply chain initiatives to have achieved standards confirmed by independent evaluation to be 100% aligned with the OECD Guidance, including Annex II risks, and response to such risks[1].

An essential enabler for due diligence is the presence of an on-the-ground team to continuously monitor and evaluate risks, engage local stakeholders, and report on mitigation as described in the Appendix of the OECD Guidance. ITSCI provides expert teams across the Great Lakes Region who made around **520 visits** to mine or company sites **per month** (average) to provide credible risk information and make recommendations to, and build capacities of, supply chain companies and other stakeholders.

ITSCI receives information on risks from multiple sources including our own on-the-ground teams, government agents, company representatives, the community, local NGOs, UN and other reports. ITSCI also operates a **whistleblowing mechanism** in the DRC, partly funded by Apple Inc. This includes a toll-free hotline allowing anyone to report risks or incidents and through which 1,175 calls were received in the last year. All relevant potential and verified supply chain risks are captured in the ITSCI incident management system to track issues in terms of category and severity, and track mitigation with measures of status and outcome.

ITSCI's expert teams provide support and recommendations to stakeholders for actions appropriate for OECD aligned **mitigation**, and ITSCI also facilitates 45 national, provincial and mine area level **multi-stakeholder** committees to transparently discuss mitigation plans. Our teams also conduct regular **training** sessions on a wide range of issues including traceability procedures, overall due diligence principles, risk assessment and mitigation. ITSCI supplements on-the-ground activity with **analysis** of corrective actions and outcomes of incidents monitored and closed over 12 months to understand the mitigation impact of the programme.

This report covers the twelve-month period 1st November 2019 to 31st October 2020 relating to mineral supply chains from Burundi, Democratic Republic of Congo (DRC), Rwanda and Uganda. During that time, ITSCI has recorded and managed a total of **1,338 incidents, across 2,330 monitored mine sites**, as well as along transport routes at the four countries within Africa. In this period, we have recorded the export of over 18,000 metric tonnes of 3T mineral concentrate through approximately 560,000 in-region transactions, as well as through the international trading chain to independently audited smelters.

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[1]OECD alignment assessment https://www.oecd.org/corporate/industry-initiatives-alignment-assessment.htm

# METHODOLOGY OF INCIDENT MANAGEMENT AND REVIEW

ITSCI and its field implementation partner Pact has developed the incident management process in alignment with the OECD guidance, and with added direct experience and vital lessons learned over the course of programme's growth and implementation. Both the incident categorisation and reporting system have evolved significantly and progressed since our work piloted in 2010.

## Categories

Incidents are evaluated as relevant to one or more key issues under the **categories** of due diligence, chain of custody, corruption, armed groups and security forces and human rights and other concerns. Other concerns go beyond topics mentioned in the OECD Annex II to include recording of issues such as health and safety or mining in protected areas although the primary focus remains on establishing a supply chain free of human rights abuses and conflict financing. In total ITSCI has defined 49 sub-categories of incident to sufficiently classify the many potential risk types.

## Levels of seriousness

In addition to categories of type, incidents are allocated a **level of seriousness**. There are 3 levels, where 3 is ranked the lowest and 1 the highest level of seriousness. Priority issues requiring immediate and high level attention and possible disengagement in the supply chain are classified as Level 1. Level 1 incidents may also be considered **High Risk** when relevant for U.S. Securities and Exchange Commission (SEC) reporting. Low level incidents relating to mistakes or lack of capacity or training are considered Level 3, with intermediate or repeated issues as a mid-category of Level 2.

## Status

ITSCI investigates the causes of incidents to help determine and advise stakeholders on mitigation activities and to focus on where efforts are needed to achieve improvements. Incidents may remain open for up to six months while the ITSCI team and/or involved stakeholders are verifying information, monitoring the situation and/or implementing mitigation actions but after that time will be closed off and allocated a final **status** chosen from one of the three possibilities below:

▲ **RESOLVED** - THE ITSCI TEAM AND/OR INVOLVED STAKEHOLDERS HAVE AGREED AND IMPLEMENTED ACTIONS WHICH HAVE RESULTED IN SATISFACTORY MITIGATION.

▲ **UNRESOLVED** - THE INVOLVED STAKEHOLDERS MAY NOT HAVE AGREED, OR COMMONLY HAVE NOT EFFECTIVELY IMPLEMENTED ALL RECOMMENDED MITIGATION ACTIONS.

▲ **INCONCLUSIVE** - THE ITSCI TEAM DO NOT FIND SUFFICIENT EVIDENCE TO SUPPORT AN ALLEGATION OR NEED FOR MITIGATION.

## Outcomes

Following closure of each incident, the team identifies whether positive outcomes were achieved, such as arrest or sanction by authorities, or whether all expected outcomes were not achieved due to lack of engagement from responsible stakeholders. For metrics, stakeholders were analysed based on their ability and success in influencing, shaping and improving final outcomes of reported incidents. Outcomes were identified for four core groups:

- ▲ COMPANIES
- ▲ AUTHORITIES
- ▲ CIVIL SOCIETY
- ▲ ITSCI

In total ITSCI has defined 32 potential outcomes to enable identification of trends. For this public summary, outcomes have been aggregated into 7 outcome groups to reduce the complexity of reporting.

# INCIDENT NUMBERS AND RESOLUTION STATUS

The 1st November 2019 to 31st October 2020 reporting period has been selected by ITSCI to enable downstream companies who report on their due diligence activities in the first quarter of any calendar year to reference ITSCI data and explain how they have evaluated the potential impact on their own supply chains. Direct comparison with other ITSCI publications which refer to calendar years should not be made.

A total of 1,338 incidents were recorded by ITSCI in the 12-month period from 1st November 2019 to 31st October 2020, which is a similarly high number compared to incidents recorded in the previous reporting period (1,492). It is notable that this (and the previous) reporting period had high numbers of incidents recorded over 12 months. The total number of recorded incidents is influenced by a range of factors, addressed further below. Figure 1 shows the division of incident occurrence and status across ITSCI operating areas listed as follows.

- ▲ AT THE COUNTRY LEVEL FOR BURUNDI (BU), RWANDA (RW) AND UGANDA (UG)

- ▲ AT THE SUB-NATIONAL LEVEL FOR DRC, INCLUDING 'KATANGA' (KT), MANIEMA (MN), NORTH KIVU (NK) AND SOUTH KIVU (SK)

- ▲ NOTING THAT AGGREGATED DATA IS REPORTED FOR 'KATANGA' WHICH ENCOMPASSES THE NEW PROVINCES OF HAUT-LOMAMI, HAUT-KATANGA, TANGANYIKA AND LUALABA TO ALLOW FOR COMPARISON AGAINST OTHER ITSCI PUBLICATIONS
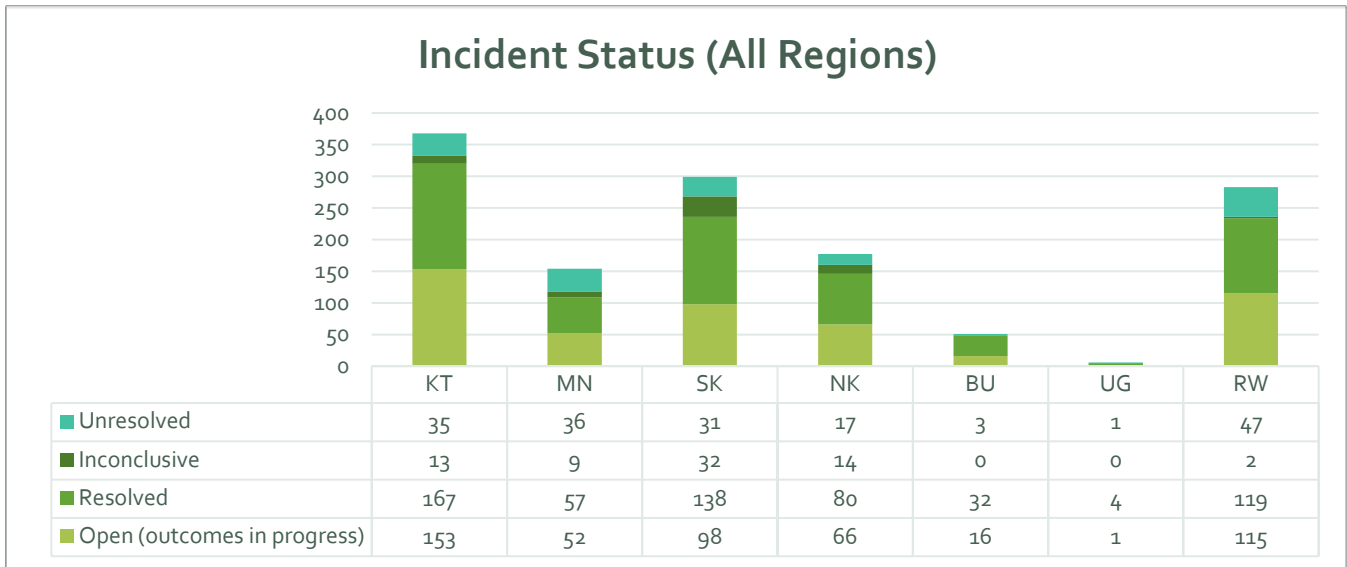
## Incident Status (All Regions)



| | KT | MN | SK | NK | BU | UG | RW |
|---|---|---|---|---|---|---|---|
| ■ Unresolved | 35 | 36 | 31 | 17 | 3 | 1 | 47 |
| ■ Inconclusive | 13 | 9 | 32 | 14 | 0 | 0 | 2 |
| ■ Resolved | 167 | 57 | 138 | 80 | 32 | 4 | 119 |
| ■ Open (outcomes in progress) | 153 | 52 | 98 | 66 | 16 | 1 | 115 |

**Figure 1. Incident numbers and status for the reporting period**

In any reporting period the total number of recorded incidents is influenced by a range of factors, including but not limited to the following.

- ▲ TOTAL LEVEL OF PRODUCTION

- ▲ NUMBERS OF MINES, AS WELL AS THE ACTIVITY LEVEL OF THOSE MINES

- ▲ NUMBERS OF OPERATORS, AS WELL AS THE AMOUNT OF BUSINESS THE OPERATORS COMPLETE

For example, new companies may set up in business to engage in 3T trading, and may be less familiar with due diligence requirements, therefore potentially increasing the number of incidents. However, those same new companies may be less able to compete in what is a new market for them and deal in only low weights of mineral, therefore potentially decreasing the number of incidents. Understanding context (including the impact of COVID-19 in the reporting period) and establishing trends is highly complex and requires access to full ITSCI information which is not available in this report. (COVID-19 caused supply chain disruption; refer to https://www.itsci.org/2020/05/11/impact-of-covid-19-on-artisanal-miners-in-central-africa/ for additional detail.) We recommend that readers do not attempt to draw any conclusions other than contained in this report.

Success in resolution of incidents can be assessed by considering the percentage of those resolved from the total number verified as incidents and not found to be inconclusive. In this reporting period the resolution rate overall was 79% with variations between areas illustrated in Table 3. Incidents may result in actions taken by stakeholders and thus in positive outcome but may be categorised as unresolved if not all expected outcomes based on ITSCI and OECD expectations were achieved.

**Table 3. Percentage of resolved incidents for the reporting period**

| ITSCI INCIDENT RESOLUTION | KT | MN | SK | NK | BU | UG | RW |
|---|---|---|---|---|---|---|---|
| Resolved | 167 | 57 | 138 | 80 | 32 | 4 | 119 |
| Unresolved | 35 | 36 | 31 | 17 | 3 | 1 | 47 |
| Total | 202 | 93 | 169 | 97 | 35 | 5 | 166 |
| **Resolved Incidents (%)** <br> **1 Nov. 19 to 31 Oct. 20** | **83%** | **61%** | **82%** | **82%** | **91%** | **80%** | **72%** |

COVID-19 budget reductions and travel restrictions impacted the resolution of incidents in the reporting period, notably in Q2 and Q3. Resolution of risks in Maniema was challenging in this reporting period due to reduction of field staff associated with COVID-19 impacts, which prevented follow up in Q2 and Q3, and reduced stakeholder meetings also associated with COVID-19. Resolution of risks in North Kivu, whilst improved in this reporting period, remained challenging due to a complex context and ongoing regular disputes between stakeholders. Lockdowns introduced by governments in the Great Lakes Region related to COVID health measures restricted some movements of ITSCI staff in the regions on following up on incidents, notably in Rwanda.

The relative proportion of Level 1, 2, and 3 incidents per ITSCI area is given in Table 4 and illustrated in Figure 2. While Level 1 incidents include serious breaches of due diligence or traceability, they more commonly relate to weaker governance or greater insecurity in particular locations.

**Table 4. Relative proportion of Level 1, 2, and 3 incidents per ITSCI area**

| LEVEL | KT | MN | SK | NK | BU | UG | RW | TOTAL DRC | TOTAL |
|---|---|---|---|---|---|---|---|---|---|
| Level 1 | 39 | 20 | 30 | 25 | 0 | 0 | 3 | 114 | 117 |
| Level 2 | 149 | 40 | 103 | 69 | 4 | 1 | 97 | 361 | 463 |
| Level 3 | 180 | 94 | 166 | 83 | 47 | 5 | 183 | 523 | 758 |
| **Total** | **369** | **154** | **299** | **177** | **51** | **6** | **283** | **998** | **1,338** |

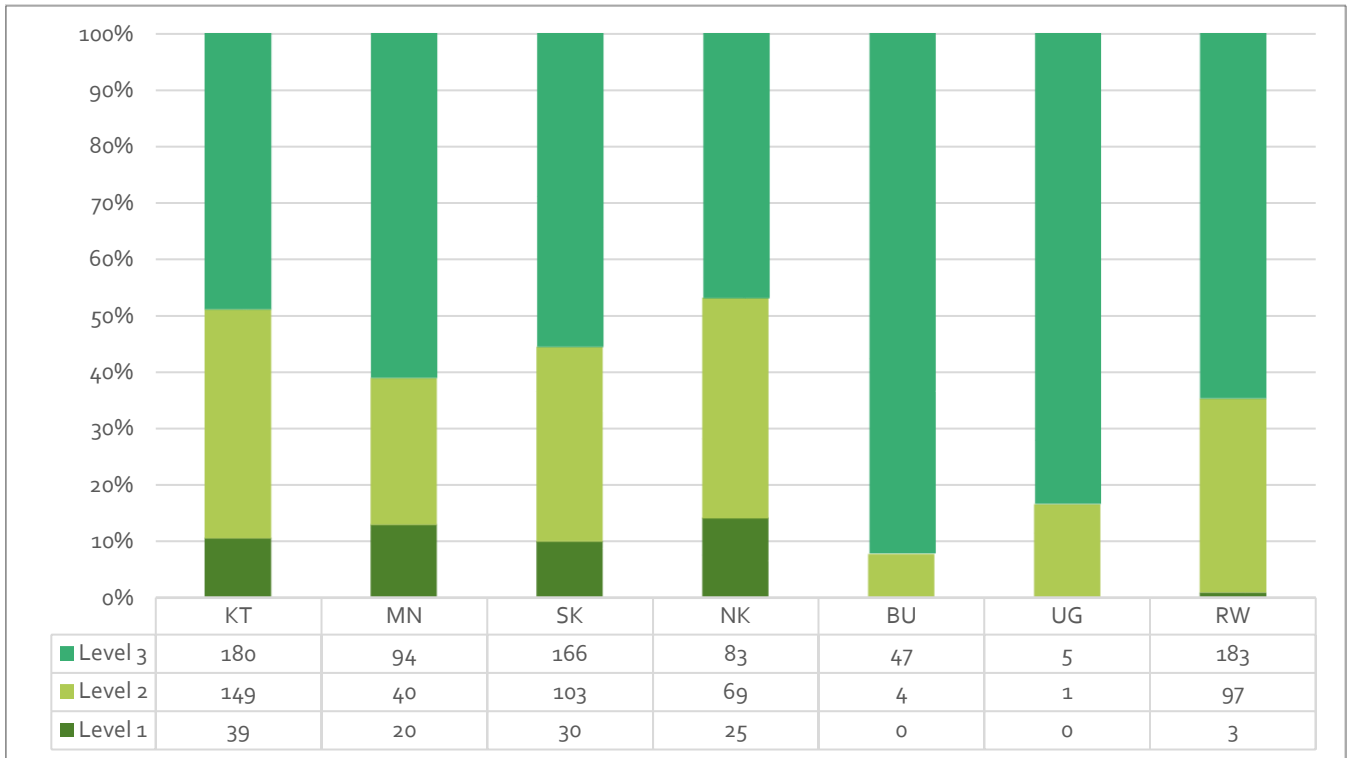| | KT | MN | SK | NK | BU | UG | RW |
|---|---|---|---|---|---|---|---|
| Level 3 | 180 | 94 | 166 | 83 | 47 | 5 | 183 |
| Level 2 | 149 | 40 | 103 | 69 | 4 | 1 | 97 |
| Level 1 | 39 | 20 | 30 | 25 | 0 | 0 | 3 |

**Figure 2. Seriousness of incident per area for the reporting period**

# INCIDENT OUTCOMES

ITSCI has defined and uses 32 outcomes which measure the impacts achieved through the management of incidents and indicate the type of stakeholder engaged in the mitigation process. Outcomes of successful resolution are determined once any incident has been closed. Under ITSCI procedures this requires that all details of the identified risk are known, mitigation actions appropriate to OECD Annex II have been recommended and discussed, the mitigation actions have been implemented, and improvement confirmed.

For the purposes of providing a simplified overview of the positive impacts achieved through the ITSCI programme, the 32 outcomes have been combined into 7 aggregated groupings as follows.

- ▲ DUE DILIGENCE IMPROVEMENTS
- ▲ GOVERNANCE & SECURITY IMPROVEMENTS
- ▲ MINE/COMPANY/MINERAL SUSPENSION OR SEIZURE
- ▲ AWARENESS-RAISING & MEDIATION
- ▲ HUMAN RIGHTS/HEALTH AND SAFETY RISK MITIGATION
- ▲ INCIDENT UNSUBSTANTIATED
- ▲ INCIDENT UNRESOLVED

Figure 3 illustrates the division of outcomes which have been achieved by the work and cooperation of all stakeholders, and the programme itself, in this reporting period. Note that there may be more than one outcome per incident.
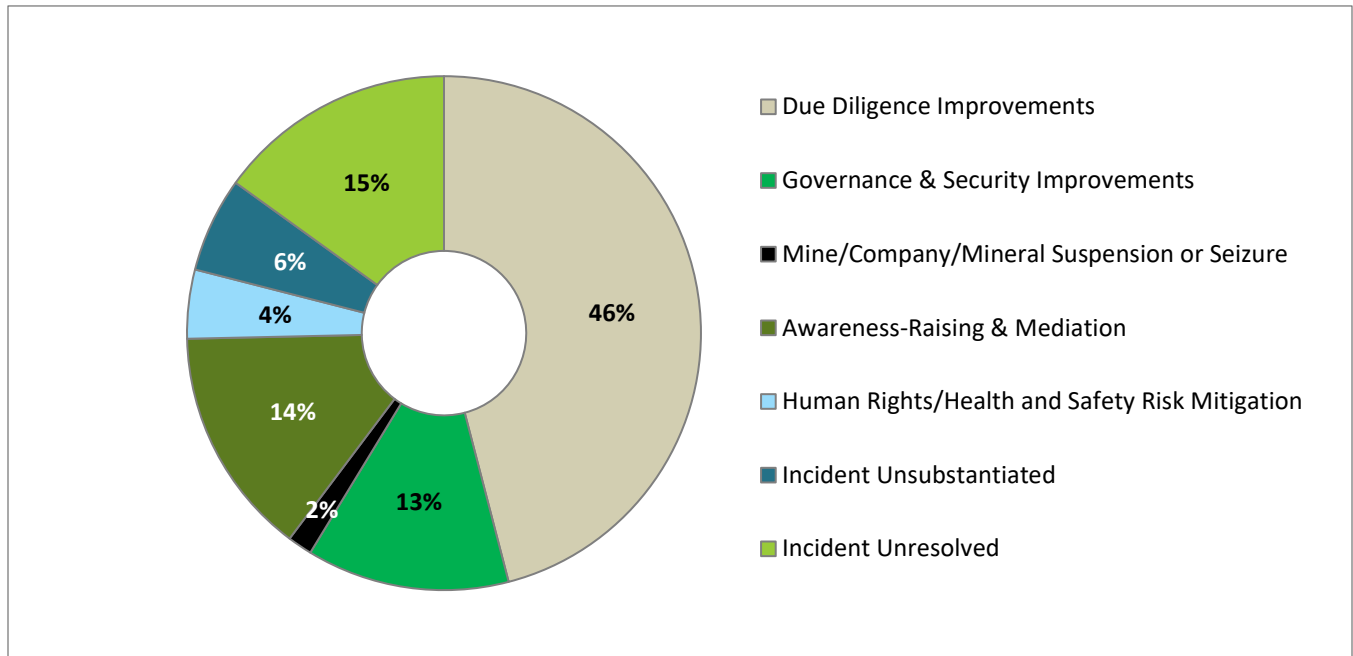


**Figure 3. Aggregated incident outcomes achieved in the reporting period**

Companies take actions to enhance **due diligence**, such as making additional mine site visits, improving working practices, drafting risks assessment reports, and implementing mitigation measures. These actions can also be supported through focused monitoring and training by ITSCI field staff. Analysis of the data revealed that the measure of Governance and Security Improvements and Awareness-Raising and Mediation improved marginally, whilst Due Diligence Improvements decreased marginally from that in previous calendar year.

Many risks arise from the operating environment and the need for capacity building at government level. It is therefore interesting to highlight that 13% of the outcomes are related to improvement in **governance and security** performance. Examples include, arrests, court martial, reposting of mining or security service staff or similar legal actions against perpetrators, as well as improved performance through training or new commitments to principles of due diligence.

In addition to direct actions related to specific incidents, it is positive to also note **awareness raising and mediation** enabled the ITSCI team, stakeholders and multi-stakeholders to share information that improved processes and procedures. These form the bedrock of continued improvement and better management of risks in the longer term and these actions accounted for 14% of the total impacts. In the DRC, ITSCI currently facilitates local consultation and mitigation at 7 provincial and 40 local committees, chaired by state services and authorities, and with civil society participation, and continues to encourage the set-up of national steering committees in

Burundi and Rwanda. In Burundi, one national committee has been established. In Rwanda, 8 District Mining Task Forces have been established so far in which ITSCI participate.

One key role of ITSCI on-the-ground teams is to assist companies in performing their due diligence and to support state services and authorities to enhance their management of mining activities and improve overall governance of the mining sector. To achieve these objectives, ITSCI teams conduct regular training sessions, one-to-one coaching sessions, capacity-building activities or group workshops for state agents, miners, negociants (middlemen), mining cooperatives, and exporters. Topics include a wide range of issues including tagging and traceability procedures, overall due diligence principles and risk assessment and mitigation. In the reporting period November 2019 to October 2020, ITSCI on-the-ground teams conducted **435 training sessions** with a total of **7,408 beneficiaries**. The extensive training activities performed by ITSCI over this time helped to achieve the high proportion of due diligence improvement (46%) as incident outcomes.

# HIGH RISK INCIDENTS FOR SEC REPORTING

## High Risk incidents for the reporting period

Of the total 1,338 incidents recorded in the reporting period, 9 were identified as High Risk in relation to **US SEC reporting**. The process of identifying incidents potentially relevant to US SEC reporting took place via rigorous assessment and analysis by ITSCI working in close collaboration with our field implementation partner to check facts on the ground. These are Level 1 incidents which are associated with the potential involvement of individuals who are, or may be, members of an armed group that is identified as a perpetrator of serious human rights abuses in annual Country Reports on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961 (22U.S.C. 2151n(d) and 2304(b)) relating to the DRC or an adjoining country. This may relate to non-state armed groups or rogue individuals in state armed groups such as the police or national army whether the individual themselves was armed at the time of the incident.

The numbers of High-Risk incidents per area are shown in Table 5. Overall, across all ITSCI areas, 8% of Level 1 incidents were considered High Risk.

**Table 5. High risk incidents identified in the reporting period**

| ITSCI OPERATING AREAS | LEVEL 1 TOTAL | LEVEL 1 HIGH RISK | % AS LEVEL 1 |
|---|---|---|---|
| KT | 39 | 2 | 5% |
| MN | 20 | 1 | 5% |
| NK | 30 | 2 | 6% |
| SK | 25 | 4 | 14% |
| BU | 0 | 0 | 0% |
| RW | 0 | 0 | 0% |
| UG | 3 | 0 | 0% |
| **Total** | **117** | **9** | **8%** |

At the end of the reporting period all the High Risk incidents were open and under mitigation and the team will continue to monitor the incidents in accordance with the ITSCI procedures.

## Update on 2018-2019 High Risk incidents

In 2019, 9 of the 1,492 incidents reported and monitored were identified as High Risk and having potential links to rogue elements of the police in the DRC and/or the DRC national army in connection with a variety of alleged illicit activities such as fraud, bribery, illegal payments, or taxation. Three of the 9 incidents **were closed at the end of the 2019 reporting period** and the remaining 6 **were closed** during 2020 after follow-up in accordance with ITSCI criteria.

Of the 6 outstanding incidents, 4 were closed after it was confirmed that alleged collection of illegal taxes ceased. Concerning 2 of the incidents, barriers were removed following stakeholder engagement. In another incident illegal taxation ceased but the barrier remained in place for document checks, however, there have been no further reports of illegal taxation. Illegal taxation also ceased in a fourth incident following sanctions against the soldiers involved resulting in the army Major responsible being imprisoned and the unit being replaced. The remaining 2 incidents were closed as unresolved due to insufficient engagement by local authorities and/or companies.

# FURTHER INFORMATION

Companies who wish to perform continual due diligence can participate as members of the ITSCI Programme in order to be regularly informed of individual incidents. Members receive a monthly report on each incident, actions recommended and underway, and whether each incident has been resolved. In addition, ITSCI members receive alerts on each Level 1 incident as soon as sufficient information is available to describe the risk so that companies can determine their own due diligence strategy in response to that risk.

Further to this report, ITSCI can support downstream companies in their individual compliance reporting requirements with additional detail and analysis. To access information, it is possible either to join ITSCI as an Associate member or provide an individual financial contribution to cover the costs of reporting requirements.

Information on all incidents is also made public with a delay of three months after all incidents in any six-month period have been closed. Incident information is available on the Info pages of the ITSCI website: https://www.itsci.org/incident-summaries-public/

For requests, suggestions or enquiries please contact the Secretariat of the ITSCI Programme at Unit 3, Curo Park, Frogmore, St. Albans, Herts AL2 2DD, UK, or via email to itsci@internationaltin.org

Our special thanks go to the ITSCI reporting teams for their commitment and continued hard work.

**Notice**

## ANNEX I. Overview of incident outcomes and aggregated outcome groupings

| Overview Level | Detailed Level | Description |
|---|---|---|
| Due Diligence Improvements | Improved company due diligence | Company gathers more information from suppliers, through mine visits or other sources and follows up |
| | Improved company procedures | Company improves working practise or formalises documentation and systems |
| | Improved data | ITSCI and the company, in cooperation with relevant state services, resolve questions on data or supply chain of custody information |
| | Plausibility control | ITSCI manages risks from implausible mineral type or production level at mines or weight changes |
| | Risk alert to companies | ITSCI provides alerts on higher risk mines, suppliers or locations to participants |
| | Improved ITSCI procedures | ITSCI enhances method of working or documentation including adapting processes to local requirements |
| | Continued monitoring | ITSCI continues focused monitoring beyond incident period of issues considered high risk or likely to reoccur |
| Governance & Security Improvements | Improved private security | Company formalises contracts with private security provider, vets or trains the security firm on human rights |
| | Completed legal process inc. arrests | Authorities take corrective action which may include arrest, fine or other enforcement measures through the legal process |
| | Change in legislation or procedure | Authorities or customary leaders introduce national or local law or revised procedures to protect traceability and reduce risk |
| | Change in customary behaviour | Tribal or other traditional leaders adopt new behaviour to support supports due diligence |
| | Improved state security | Authorities provide added security, train or improve protection around mineral areas |
| | Action from command | Authorities take corrective action which may include a hearing and enforcement measures against rogue individuals in official position |
| | Improved government performance | Authorities replace poor performing or missing agents, increase number of agents, or participate in training |
| | Protection of national park | Authorities prevent minerals originating from national parks entering the supply chain |
| | Increased local accountability and monitoring | Stakeholders take action to protect responsible supply chains including through whistleblowing |
| | Reduced corruption | Stakeholders identify, report or prevent corruption |
| | Membership or mineral trade suspension | ITSCI suspends companies or mines from participation or freezes mineral movement |

| Overview Level | Detailed Level | Description |
|---|---|---|
| Mine/Company/Mineral Suspension or Seizure | Mineral quarantined | ITSCI requests participants to set aside mineral from trading during incident investigation |
| | Suspension of operators | Authorities suspend mining licenses or operators |
| | Minerals seized | Authorities seize questionable minerals |
| Awareness-Raising & Mediation | Awareness raising | Stakeholders participate in informal training or receive general advice on processes or activity |
| | Formal training | Stakeholders participate in formally organised training or coaching sessions with specified ITSCI objectives |
| | Stakeholder dialogue | Stakeholders participate in negotiation between commercial parties or others to resolve disputes |
| Human Rights/Health and Safety Risk Mitigation | Improved safety | Stakeholders close mines or act to prevent repeated accidents through measures such as training |
| | Company contribution | Company pays compensation to injured miners or community |
| | Reduced child labour | Stakeholders train, raise awareness or take measures to reduce child labour |
| | Reduced forced labour | Stakeholders take action to prevent forced labour |
| Incident Unsubstantiated | Unresolved inconclusive | Unresolved due to lack of sufficient information or any evidence to enable a conclusion to be reached |
| Incident Unresolved | Unresolved lack engagement | Unresolved due to lack of requested information or action from company or authorities |
| | Unresolved incomplete legal process | Unresolved due to failure to complete legal process following arrests or similar |
| | Unresolved lack international agreement | Unresolved due to no agreed solution, including for disposal of seized minerals |