



# FTSE4Good Index Series Uranium Mining Criteria

## 1. Introduction

The FTSE4Good Policy Committee has an ongoing commitment to remove the negative screens currently employed by the FTSE4Good Index and replace them with appropriate entry criteria. This has to date been achieved for companies involved in the marketing of infant formula and breast milk substitutes and has now been completed for those companies involved in the activity of mining uranium.

## 2. Background

The mining of uranium poses specific risks for the companies in this industry, and for stakeholders affected directly or indirectly by this activity. It is the effective management of these specific risks and challenges that the uranium mining criteria seek to capture. These criteria will aim to identify the most responsible uranium mining companies, and also provide a clear framework of standards and criteria that they must meet in order to become constituents of the FTSE4Good series.

## 3. Application of Criteria

Companies who are involved in the mining of uranium and are eligible for inclusion in the FTSE4Good Index will be required to meet the criteria in full to gain entry to the index. The uranium mining criteria will need to be met *in addition to* the standards currently applying to high environmental impact companies and high impact (global resource sector) human rights companies. Copies of these criteria can be found at:

[http://www.ftse.com/Indices/FTSE4Good\\_Index\\_Series/index.jsp](http://www.ftse.com/Indices/FTSE4Good_Index_Series/index.jsp)

The proposed uranium mining criteria cover five areas:

- Environmental impact and management
- Health and safety
- Community and employee responsibility
- Product stewardship
- General criteria

# FTSE4GOOD URANIUM MINING CRITERIA

## Section 1 - Environmental Impact and Management

<p><b>Public Policy</b></p>	<ul style="list-style-type: none"> <li>▪ Commitments to carrying out Environmental Impact Assessments (EIAs) prior to new projects/ developments</li> <li>▪ Commitments to site rehabilitation, appropriate decommissioning &amp; post-decommissioning, and to making adequate financial provisions for this</li> <li>▪ Commitment to minimising biodiversity and ecological impacts, and monitoring biodiversity close to sites and other affected areas</li> <li>▪ Specific policy commitments to meet the highest international standards of tailing dam management and waste management such as those outlined in the European Commission JRS 2004 Reference Document on Best Available Techniques for Management of Tailings and Waste Rock in Mining</li> </ul>
<p><b>Management Systems</b></p> <p><i>Companies must provide evidence of the following</i></p>	<ul style="list-style-type: none"> <li>▪ EMS must be externally verified to an accredited international standard (i.e. ISO14001/EMAS) and covers entire uranium mining operations</li> <li>▪ Waste management system</li> <li>▪ EIA that includes ecological and biodiversity assessments prior to all significant projects and developments</li> <li>▪ System for re-location of threatened species (as determined by the IUCN red list of endangered species) or ecosystems directly affected by projects</li> <li>▪ Monitoring and minimisation of: leaching, radiation entering ecosystems and bioaccumulation, dust, and waste (including but not limited to tailings). In addition, investigations and systems to minimise: leaks, spills and operating breaches</li> <li>▪ Systems to minimise risk of hazards/ failures of tailing dams</li> <li>▪ Provision of capital resources (e.g. bonds /accruals), or equivalent guarantees from parent/ Group Company for the rehabilitation of sites in the circumstance of operations closing or for unexpected environmental damage rectification. <i>(This should be applied in all uranium mine sites including those where the local Government does not require this. Demonstration of how the company would meet these rehabilitation costs through cash deposits or clear accruals in its published accounts.)</i></li> <li>▪ Calibration &amp; validation of geological/ hydrological models with third party experts</li> </ul>
<p><b>Reporting</b></p>	<ul style="list-style-type: none"> <li>▪ Clear description of how radioactive waste is managed on site</li> <li>▪ Disclosure as to whether the company has any obligations on receiving uranium derived waste from clients or others, and if so how this dealt with</li> <li>▪ Data on: leaching, radiation entering ecosystems and bioaccumulation, waste management (including, but not limited to tailings), leaks, dust, spills and operating breaches</li> <li>▪ Results from sites' water and radiation transport and biodiversity monitoring</li> <li>▪ Evaluations of success of decommissioning/rehabilitation of former sites with specific regards to biodiversity, water and radiation transport</li> <li>▪ Key results of EIAs</li> </ul>

## Section 2 – Health and Safety

<p><b>Policy</b></p> <p>The Policy must clearly state commitments to:</p>	<ul style="list-style-type: none"> <li>▪ Health &amp; safety screening and confidential monitoring for employees</li> <li>▪ Keeping below specific radiation exposure to employees</li> <li>▪ Ensure all employees involved in uranium mining receive health and safety training</li> <li>▪ Monitoring and reducing accident levels</li> <li>▪ Have and involve workers in a safety committee</li> </ul>
<p><b>Management Systems</b></p>	<ul style="list-style-type: none"> <li>▪ Monitoring of: exposure to dusts and ammonia/acid mists, radiation exposure, exposure to crystalline silica, metal uranium, noise and vibration, accident and incident (accidents that almost happened) levels</li> <li>▪ Safety assessments</li> <li>▪ Provision of proper and fully serviceable personal protection and related equipment and clothing for all employees</li> <li>▪ Post-operation monitoring and surveillance</li> <li>▪ Functional joint (including worker representation) health and safety committee</li> </ul>
<p><b>Reporting</b></p> <p>Reporting must include as a minimum:</p>	<ul style="list-style-type: none"> <li>▪ Radiation levels               <ul style="list-style-type: none"> <li>○ Employee exposure levels</li> <li>○ Local community exposure levels</li> <li>○ In water sources</li> <li>○ Bioaccumulation</li> </ul> </li> <li>▪ Accident levels and fatalities (employees and local people) that relate to uranium mining and associated operations</li> <li>▪ Findings of investigations looking into causality of any of the above</li> <li>▪ Description of and report from the health and safety committee</li> </ul>

## Section 3 – Community and Employee Responsibilities

<p><b>Policy</b></p> <p>The Policy must clearly state commitments to:</p>	<ul style="list-style-type: none"> <li>▪ Carrying out Social Impact Assessments (SIAs) prior to new projects/developments</li> <li>▪ Stakeholder dialogue and using the results of this in decision-making</li> <li>▪ Supporting employees and local communities in mine wind-up and closure &amp; maintaining safe drinking water supply</li> </ul>
<p><b>Management Systems</b></p>	<ul style="list-style-type: none"> <li>▪ Social Impact Assessments (SIAs) prior to all significant projects and developments</li> <li>▪ Systems to facilitate stakeholder dialogue (especially with community groups, indigenous people, and employees) and to feed the output from this into decision making</li> <li>▪ Feedback to stakeholders consulted on how their input has been used</li> <li>▪ Social evaluations before mine/site decommissioning</li> <li>▪ Process for identifying and protecting subsistence related resources of local communities including water, flora and fauna</li> </ul>
<p><b>Reporting</b></p> <p>Reporting must include as a minimum:</p>	<ul style="list-style-type: none"> <li>▪ Key results of SIAs</li> <li>▪ Information on stakeholder dialogue, including how stakeholders identified, process to facilitate dialogue and the feedback &amp; results</li> <li>▪ How results fed into decision making</li> </ul>

## Section 4 – Product Stewardship

<p><b>Policy</b></p> <p>The Policy must clearly state commitments to:</p>	<ul style="list-style-type: none"> <li>▪ Not supplying uranium for the purposes of:             <ul style="list-style-type: none"> <li>○ Nuclear weapons or other weapons manufacture (companies must provide assurances that this is the case)</li> <li>○ Civil nuclear programmes of non-nuclear-weapon states <i>if</i> those states are not covered under safeguard agreements based on the International Atomic Energy Agency (IAEA) safeguard system and under the Nuclear Non Proliferation Treaty (NPT)</li> </ul> </li> <li>▪ Monitoring the chain of custody with disclosure of customers and their locations and the on-going chain of custody to the end user</li> </ul>
<p><b>Management Systems</b></p>	<ul style="list-style-type: none"> <li>▪ Monitoring chain of custody to ensure compliance with policy and checking with customers on who they are planning to sell on to</li> <li>▪ Taking appropriate action if uranium is received by parties deemed unacceptable or used in unacceptable products, (from terminating relationship with particular clients through to informing relevant authorities)</li> </ul>
<p><b>Reporting</b></p> <p>Reporting must include as a minimum:</p>	<ul style="list-style-type: none"> <li>▪ Details on the pathway of customers (ie chain of custody) for all uranium sold</li> <li>▪ End use of all uranium produced</li> </ul>

## Section 5 – General CR Requirements

<p><b>Policy</b></p> <p>A policy document must be publicly available which includes explicit statements that:</p>	<ul style="list-style-type: none"> <li>▪ Contractors must meet same standards in all these (criteria) regards as the operating company</li> <li>▪ Board level responsibility for Environment, Health &amp; Safety, Community/Employee issues and Product Stewardship is clearly defined</li> <li>▪ Commitments clearly stated to maintain the same environmental and social standards in all countries/regions</li> </ul>
<p><b>Management Systems</b></p>	<ul style="list-style-type: none"> <li>▪ Compliance monitoring systems to check validity of allegations, to identify any non-compliance and to rectify these.</li> <li>▪ Third-party auditing (against all the system requirements) conducted at all uranium mining sites (and/or open pit mines, tailing dams)</li> </ul>
<p><b>Reporting</b></p> <p>Reporting should cover the following areas:</p>	<ul style="list-style-type: none"> <li>▪ All legal, governmental, state, statutory, or other regulatory requests of the company on social, governance or security grounds, and related fines, penalties or convictions</li> <li>▪ Results from internal compliance monitoring systems, and details of how any non-compliance has been rectified</li> <li>▪ Results from 3<sup>rd</sup> party audits</li> </ul>