**TOWARDS
SUSTAINABLE
MINING**

Crisis Management and
Communications Planning Protocol

Request for Public Comment

Minor Revisions to the *TSM Crisis Management and Communications Planning Protocol*

The Mining Association of Canada is proposing minor revisions to the *TSM Crisis Management and Communications Planning Protocol*. Comments from any individuals or organizations with an interest in this protocol are welcomed by **September 15, 2022**.

All comments received will be reviewed by the Mining Association of Canada and its members and will inform discussions by the TSM Community of Interest Advisory Panel. MAC aims to finalize revisions to the protocol and publish an anonymized summary of the type and nature of comments received in late 2022. Some comments received may be logged for consideration during a future comprehensive review of the protocol.

Substantive proposed changes are indicated in the attached document in yellow highlight. Minor changes to exiting criteria are indicated in green highlight. Other editorial and formatting changes are indicated in blue highlight.

Some of the substantive changes include:
- Clarification that a crisis control centre can be virtual, physical or hybrid.
- Engagement with communities of interest on the Local Crisis Management Plan.
- Review and update of media and stakeholder contact information.
- More frequent full-scale crisis simulations (every two years instead of every three).
- Review and update of the Local Crisis Management Plan with a change in business.
- Removal of two frequently asked questions that are less relevant in the digital age.

Please submit any comments to the Mining Association of Canada at tsm@mining.ca by **September 15, 2022**.

TSM ASSESSMENT PROTOCOL

A Tool to Assess Crisis Management and Communications Planning Performance

Purpose

The purpose of this TSM protocol is to support evaluation of corporate and facility-level crisis management and communications planning. This includes a crisis management and communications plan, regular review of the plan, and regular training to support effective implementation of the plan.

Performance Indicators

To assess performance in line with this purpose, the Crisis Management and Communications Planning Protocol specifies criteria associated with three indicators:

1. Preparedness

2. Review

3. Training

Companies must assess their performance on each indicator for their corporate office and each of their Canadian operating facilities. Unlike most other TSM protocols, these three indicators are scored on a Yes/No rating scale. All criteria must be met in to assign a Yes rating for an indicator. If a criteria or indicator is not relevant, then an assessment of Not Applicable (N/A) should be assigned.

As with any assessment of a management system, professional judgment is required to assess alignment with each indicator and associated criteria. Application of this protocol will therefore require a level of expertise in auditing and systems assessment, as well as knowledge and experience in the practice of crisis management and communications planning, including relevant regulatory regimes and requirements. This protocol is a tool to assess the level of implementation of crisis management and communications planning. It is not, of itself, a guarantee of effectiveness of these activities, but is intended to create the awareness, practice and corporate culture needed to achieve success in this area.

1. PREPAREDNESS

Purpose

To confirm that a crisis management and communications plan is in place.

Corporate: Preparedness:
Assessment Criteria

1. The CEO has endorsed and demonstrated support for crisis management and communications planning.

2. Credible threats and risks to the company have been identified

   a. Protocols have been established to address identified threats and risks.

   b. The corporate office has reviewed threats and risks identified by facilities and reflected these in corporate planning where relevant.

3. A Corporate Crisis Management Team has been established, with defined roles and responsibilities.

4. A notification mechanism is in place to activate the Corporate Crisis Management Team in the event of a crisis.

5. A media spokesperson has been assigned and trained or demonstrates equivalent qualifications and competencies.

6. Key media and stakeholder contact information has been prepared and a system is in place for tracking engagement with media and stakeholders.

7. A Corporate Crisis Management and Communications Plan has been developed and is a controlled document.

8. All Corporate Crisis Management Team members have received the Corporate Crisis Management and Communications Plan and key contact information.

9. A physical, virtual, or hybrid crisis control centre has been established and equipped.

10. Communications mechanisms have been established to alert employees to a crisis and to provide updates.

Facility: Preparedness:
Assessment Criteria

1. Credible threats and risks have been identified.

    a. Protocols have been established to address identified threats and risks.

    b. The facility has communicated identified threats and risks to the corporate office.

2. A Local Crisis Management Team has been established, with defined roles and responsibilities.

3. A notification mechanism is in place to activate the Local Crisis Management Team in the event of a crisis.

4. A media spokesperson has been assigned and trained or demonstrates equivalent qualifications and competencies.

5. Key media and stakeholder contact information has been prepared and a system is in place for tracking engagement with media and stakeholders.

6. The Local Crisis Management and Communications Plan has been developed and is a controlled document.

7. All Local Crisis Management Team members have received the Local Crisis Management and Communications Plan and key contact information.

8. A physical, virtual, or hybrid crisis control centre has been established and equipped.

9. Mechanisms have been established to alert employees to a crisis and to provide updates.

10. Relevant communities of interest have had the opportunity to engage on the Local Crisis Management Plan.

11. Annual meetings take place with senior members of the local emergency response authorities (where they exist).

Preparedness: *Frequently Asked Questions*

#	FAQ	PAGE
1	What is a crisis?	X
2	What is a controlled document?	X
3	For companies headquartered outside of Canada, does the global CEO need to endorse and demonstrate support for corporate crisis management and communications planning?	X

2. REVIEW

Purpose

To confirm that the Crisis Management and Communications Plan is reviewed and updated to remain responsive to the needs and risks of the company and its operations and to reflect industry best practice.

Corporate: Review:

Assessment Criteria

1. The Corporate Crisis Management and Communications Plan is reviewed and updated:

   a. when there is a change of personnel of those associated with implementation of the plan,

   b. when there is a change in business (e.g., a new mine), and/or

   c. at least every two years.

2. The mechanism to notify the Corporate Crisis Management Team is tested at least twice per year.

3. Key media and stakeholder contact information is reviewed or updated at least every two years.

4. Mechanisms to alert employees to a crisis and provide updates are tested at least once per year.

5. Processes exist to ensure that new Corporate Crisis Management Team members are familiarized with the Corporate Crisis Management and Communications Plan within two months of joining the team.

Facility: Review:

Assessment Criteria

1. The Local Crisis Management and Communications Plan is reviewed and updated:

   a. when there is a change of personnel of those associated with implementation of the plan,

   b. when there is a change in business (e.g., a mine expansion), and/or

c. <mark>at least every two years</mark>.

2. The mechanism to notify the Local Crisis Management Team is tested at least twice per year.

3. <mark>Key media and stakeholder contact information is reviewed or updated at least every two years.</mark>

4. Mechanisms to alert employees to a crisis and provide updates are tested at least once per year.

5. The Local Crisis Management Plan is shared with the corporate office.

6. Processes exist to ensure that new Local Crisis Management Team members are familiarized with the Local Crisis Management Plan within two months of joining the team.

CRISIS MANAGEMENT AND COMMUNICATIONS PLANNING PROTOCOL

3. TRAINING

Purpose

To confirm that crisis management training, including crisis simulation exercises, is conducted annually.

Corporate: Training:

Assessment Criteria

1. Tabletop crisis simulation exercises are conducted annually.

Facility: Training:

Assessment Criteria

1. Tabletop crisis simulation exercises are conducted annually.
2. A full crisis simulation is conducted every two years.

Training: *Frequently Asked Questions*

#	FAQ	PAGE
X	What is a 'table-top crisis simulation' exercise?	X
X	If a facility has a new Crisis Management and Communications Plan, is a full crisis simulation exercise required to achieve a Yes in Indicator 3?	X
X	Can a real-life crisis meet the requirement for a crisis simulation exercise?	X
X	Does a facility table-top exercise need to address the entire facility?	X

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APPENDIX 1: FREQUENTLY ASKED QUESTIONS

Frequently Asked Questions are a mandatory component of self-assessments and external verifications against TSM protocols. Facilities must review and follow the definitions and guidance below to support appropriate interpretation and implementation of the criteria outlined in the protocols.

1. What is a crisis?

A crisis is a sudden event that may significantly affect a company's ability to carry out its business.

It is important to distinguish between an _emergency_ (which should be handled by facility-level management through Emergency Response Plans) and a _crisis_ (which requires involvement and action from senior management at corporate and facility levels).

A crisis may exist or be developing if:

- An emergency poses a significant threat to the public or employees.

- An emergency provokes government scrutiny.

- The company no longer has full control of the situation (e.g., other agencies are taking charge).

- The situation has caused national or international media interest.

- The situation is likely to escalate and there is no immediate resolution in sight.

- The company's reputation may be damaged or there is a threat to the bottom line or share value.

Examples of incidents that are subject to crisis management include:

- Industrial emergencies – e.g., accidents resulting in critical injury or property damage, fire, building collapse, mine cave-ins, flooding, explosions, power failure, freeze-up, loss of water, etc.

- Natural disasters – e.g., flood, mud slide, tsunami, tornado, hurricane, earthquake, fire, or volcano that may jeopardize personal safety or commercial operations and severely disrupt routine commercial transportation and communications links with the affected locations.

- Medical emergencies in jurisdictions where quality medical care is remote or lacking.

- Accidental releases of materials – e.g., tailings dam failure or major chemical spill that could significantly impact the environment or health and safety of affected persons.

- Missing person incidents.

- Political and security risks – e.g., kidnapping, extortion, bomb threat, bombing,

political or civil unrest, illegal detention by local authorities, insurgent or guerrilla activity, etc.

- Any other unexpected event which might threaten the safety of employees, contractors, or the local community, or damage the reputation of the company.

2. Does a shared network facility, such as a SharePoint site, constitute a sharing of the credible threats and risks evaluation?

Yes, placing a document containing the identification of credible threats and risks on a shared network facility, like SharePoint site, is a suitable way to share these evaluations between the facility and corporate office if some form of notification is sent to the accountable person at the receiving end.

3. What is a controlled document?

A controlled document has tracking capabilities that help to ensure that employees always have the most current version of the document. This means that there is a process in place to revise and approve the document, and out-of-date versions are destroyed or withdrawn from circulation and replaced. This requires a process to keep track of issued documents to ensure that the latest revision is always circulated to replace every copy of the previous version.

Document control can take place on physical or electronic documents. In the case of electronic controlled documents, the process only extends to the point at which a document is printed. Once printed, that document is no longer considered controlled.

4. What is a 'table-top crisis simulation' exercise?

A table-top crisis simulation exercise is a useful, cost-effective tool for honing crisis management and communications skills and for helping the Crisis Management Team identify any weaknesses or gaps in their crisis management planning.

Working from a schedule of events, a facilitator offers the Crisis Management Team a series of situations to be analyzed and discussed before decisions are made and actions taken. Pressure is exerted through ever-increasing complexity and frequency of problems, with the facilitator raising issues from the perspectives of outside audiences.

Different types of crisis management planning exercises, including full crisis simulations, are described in Section 8 of the Mining Association of Canada's *Crisis Management and Communications Planning Reference Guide*. Many communications and public affairs firms offer services in crisis management and communications training.

5. If a facility has a new Crisis Management and Communications Plan, is a full crisis simulation exercise required to achieve a Yes in Indicator 3?

A facility with a new plan has two years to plan and carry out a full crisis simulation exercise. If the new plan has been tested through tabletop exercises, the assessor may respond "yes" to this indicator.

6. Can a real-life crisis meet the requirement for a crisis simulation exercise?

Yes, a real-life crisis can meet the requirement for a crisis simulation exercise if the Crisis Management and Communications Plan was implemented in response to the crisis. Following the crisis, the Crisis Management Team must meet to review the plan's implementation and identify lessons learned and the need for any modifications to the plan. The results of this review must be documented.

7. Does a facility table-top exercise need to address the entire facility?

No, but the table-top exercises should test different situations and different parts of the facility. So, over time, the entire Crisis Management and Communications Plan will be tested and reviewed.

8. How can a company with a corporate structure that stations its management employees all over the world meet the intent of the requirement to have a crisis room established and equipped?

Recognizing that a crisis room may not be appropriate for some corporate offices that are not centralized, a company can still attain a "yes" for indicator 1 if there is a formal process for bringing the corporate crisis team together virtually using technology.

9. For companies headquartered outside of Canada, does the global CEO need to endorse and demonstrate support for corporate crisis management and communications planning?

It is not necessary to demonstrate endorsement or support by the global CEO for corporate crisis management and communications planning for companies headquartered outside of Canada. In these cases, the most senior executive in Canada should provide this endorsement and support.

For more information about the TSM initiative, visit:

The Mining Association of Canada