

Reference No.	Guideline text [abbreviated]	Description of impact/ desired outcome
General Policy 1.	Contribute to sustainable development.	Given that PNG has a poor record of transforming large scale mining into sustainable development there is a need for companies to ensure development of the non-mining related economy to ensure long-term sustainability of the region post-mining.
General Policy 7.	Develop and apply self-regulation and management to build trust with society.	Inadequate/flawed assessment of mining impact both in intensity and geographical spread. Need more effective and transparent process.
General Policy 10, 11.	Due diligence, Avoid/mitigate actual and potential adverse impacts.	Newcrest bought into existing project with inadequate/flawed implementation and assessment of negative mining impact. Effective mitigation hampered by lack of publicly available information on sources and impacts of sedimentation.
General Policy 12.	Prevent and mitigate impacts where not directly responsible.	Failed to adequately identify or respond to existing and ongoing impacts when buying into the Hidden Valley mine. This also applies to suppliers and financiers.
General Policy 14.	Engage with relevant stakeholders in order to provide meaningful opportunities to contribute to decision making.	Original consultations limited in geographic extent, despite previous in-country experience of riverine impacts on downstream communities. ESAP offers partial compliance but hampered by design and lack of representation.
Disclosure 2, 3, 4.	Disclose policies and material information, environment and social reporting and performance, relationship information.	Poor disclosure. Inadequate policies by operating entity [MMJV], failure to implement existing policies of JV partners, Newcrest and Harmony Gold. Failure to adequately assess and disclose social and environmental impact.
Human Rights 1.4.	Policy commitment and respect for Human Rights.	No MMJV Policy. Do not obtain Free Prior and Informed Consent. Inadequate consultation, lack of assistance for landowners to access independent information about potential impacts and alternatives.
Human Rights 2.	Avoid causing or contributing to human rights impacts.	Indirect human rights impacts through environmental impact and economic/cultural change.
Human Rights 5.	Carry out human rights due diligence.	Poor assessment despite operating in a country known for in/direct human rights abuses in extractive industries.
Human Rights 6.	Seek remediation of impacts.	Lack of transparency regarding recognition and response to impacts. Contentious 'compensation' payments requiring forgoing of future legal options.
Environment 1a,b,c.	Establish and maintain system of environmental management.	Lack of transparency and access to EMS. Inadequate baseline data. Poor reporting. Inappropriate standards used.
Environment 2a,b.	Provide public with timely and adequate information and adequate community consultation.	Restricted consultation, slow response to crisis. Ongoing problems with information dissemination, access to independent information and consultation.
Environment 3.	Prepare an adequate environmental impact statement [EIS]	EIS failed to anticipate impacts, no public review or updated assessment. Poor transparency and consultation about un/anticipated impacts.
Environment 5.	Timely damage minimisation, maintain contingency plans.	Slow response to impacts, including amelioration strategies. Contingency plans inadequate and/or unavailable, lack of transparency about environmental management and incident response.
Environment 8.	Contribute to awareness and improved public policy.	Withholding relevant information from the public and regulatory bodies. More positively, MMJV is a member and contributing to PNG EITI and a number of local projects.
Science 2.	Transfer and diffusion of knowledge	Withheld/ failed to make available scientific reports on environmental data and impacts.