

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Singapore

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Trader

ORGANISATION

Anonymous

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Standard

General comment on Performance Area

COMMENT:

Incorporate the Extractive Industries Transparency Initiative (EITI) requirements on disclosure of payments, revenues, contracts, beneficial ownership, state participation, and other fiscal transparency measures.

COMMENT:

Strengthen anti-corruption measures by aligning with the EITI's provisions on companies' anti-corruption policies, due diligence on beneficial owners, and disclosure of payments to state-owned enterprises.

COMMENT:

Incorporate human rights and labour requirements holistically across the Standard.

COMMENT:

Strengthen meaningful consultation with rights-holders requirements, per UNGPs.

COMMENT:

Ensure the "human rights due diligence" definition aligns with UNGPs.

COMMENT:

Clearly define business relationships and associated responsibilities aligned with the UNGPs.

Performance Area 10: Emergency Preparedness and Response

COMMENT:

Require due diligence processes to identify and address potential human rights risks related to security forces and conflict situations.

COMMENT:

Incorporate the Voluntary Principles on Security and Human Rights to ensure respect for human rights in security arrangements and operations.

Performance Area 12: Stakeholder Engagement

SECTION: 1.3 Stakeholder Engagement

COMMENT:

Align stakeholder engagement requirements with IFC PS1 and the EITI principles of multi-stakeholder governance.

COMMENT:

Require meaningful and inclusive consultation with rights-holders, including potentially affected stakeholders and vulnerable groups.

COMMENT:

Consider use of "rights-holders" terminology, not just "stakeholders."

Performance Area 13: Community Impacts and Benefits

COMMENT:

Integrate gender-responsive grievance mechanisms, and measures to promote women's participation and leadership in decision-making processes.

COMMENT:

Address the specific needs and vulnerabilities of other marginalised groups, such as children, persons with disabilities, and minority groups.

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights

COMMENT:

Explicitly require grievance mechanisms to meet the UNGPs' effectiveness criteria.

COMMENT:

Mandate robust grievance mechanisms for workers and affected communities to raise concerns and seek remedy.

Performance Area 2: Business Integrity

SECTION: 2.2 Business Ethics and Accountability

COMMENT:

Explicitly require implementing the UN Guiding Principles on Business and Human Rights (UNGPs) as the foundational framework for the management system.

Performance Area 3: Responsible Supply Chains

SECTION: 1.1 Environmental and Social Management System

COMMENT:

Mandate human rights due diligence processes aligned with the UNGPs across the mining lifecycle and value chain.

COMMENT:

Align with the OECD Due Diligence Guidance by requiring human rights due diligence across the supply chain and business relationships.

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Foundational Practice, 2

COMMENT:

Strengthen requirements for meaningful consultation with affected communities, including vulnerable and marginalized groups, during the ESIA process.

SECTION: 4.2 Land Acquisition and Resettlement

COMMENT:

Directly incorporate the requirements from IFC Performance Standard 5 on land acquisition and involuntary resettlement.

Performance Area 7: Rights of Workers

COMMENT:

Align labour requirements with IFC Performance Standard 2, ILO conventions, and the UNGPs, covering non-discrimination, freedom of association, collective bargaining, occupational health and safety, etc.
