

CMSI Consultation Response

Respondent Details

NAME

Cassia Johnson

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER

Academia

ORGANISATION

University of Exeter

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

QUESTION 1

The governance principles that guided the development of the governance model are inclusive, effective, credible, impact-driven, pragmatic and efficient. From your perspective, does the proposed governance model meet expectations for consistency with these principles?

Response: 3: Meets expectations

QUESTION 2

Does the proposed governance model ensure no single group is able to unduly influence decisions?

Response: unsure

Document:
Assurance

QUESTION 1

From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 3: Meets expectations

Document:
Standard

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Foundational Practice, 2

COMMENT:

Foundational practice: 2. Engage with Indigenous Peoples

- include a word such as early or from the beginning to ensure Indigenous peoples are consulted from the beginning of a project

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples

COMMENT:

Include statement on understanding that Indigenous Peoples are rightsholders and not just stakeholders

COMMENT:

'Indigenous Governments' should also be included in the list of 'Indigenous Peoples'

Performance Area 16: Artisanal and Small-Scale Mining

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Foundational Practice, 1

COMMENT:

Foundational practice: What is understood as legality is not necessarily ethical or fair. It is critical to understand that even if the operation is informal, it is not necessarily illegal. Understand that legal systems are not often accessible by ASMs, and that legal systems are designed in favour of large enterprise mines. Large enterprises directly (large-scale mines) competing with small and medium enterprises (ASMs) is unjust, and LSMs obtaining legality should not be an excuse to remove poverty or livelihood driven miners.

It's important to understand the context, and if most rural work is done informally as many emerging economies have predominantly informal economies, and ASM is part of the informal economy.

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Leading Practice, 2

COMMENT:

'Support alternative livelihoods' - would be best supported in poverty-driven ASM, but likely not applicable in formalized small-scale mining where the miners have honed specific skill sets and have meaningful rural work within their communities

SECTION: Applicability

COMMENT:

Foundational Practice:

-Promote the inclusion and protection of small and medium mining enterprises within national mining framework, as they may not be able to compete against large enterprises.

SECTION: Glossary and Interpretive Guidance

COMMENT:

'predominantly simplified mine life cycle, including exploration, development, operations (extraction and processing), transportation, and reclamation'.

- Important to add reclamation as part of the mine life cycle, as there are growing examples of ASM reclamation

- Crucial to include this step to change the predominantly negative narrative around the industry

COMMENT:

Important to include the drivers characteristic in the definition

- ASM is linked to poverty drivers, and sometimes livelihood, skill-development, and cultural drivers

COMMENT:

The definition of legitimate ASM is difficult to conceptualize. I'm not sure if it is just to put the onus of legitimizing ASM on the miners, when many legal frameworks are not designed for ASM, or often designed to be discriminatory against ASM in favour of large-scale mining. Overall, legal frameworks should be encouraged to be inclusive of ASM - which can be articulated by the inclusion of micro, small and medium enterprise to help foster the sector.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

COMMENT:

World Heritage Sites: A lot of these need to be specified for LSM as opposed to all mining. For example, the Tr'ondëk-Klondike UNESCO site is an active small-scale mining site - which is part of what deems the site unique. The Maras Salt Mines in Peru are another example of ASM/SSM active on a world heritage site. I 100% agree that large-scale mining should not be included, but there are likely multiple instances where ASM and SSM are part of what makes a world heritage site exactly that.

COMMENT:

My research indicates that mining should be considered as an ecosystem service, which should be done in balance with other ecosystem services. This can be understood if nature is defined to include abiotic materials.

Performance Area 22: Pollution Prevention

SECTION: 22.4 Mercury

COMMENT:

While ideal, this is unrealistic. Work to replace mercury with appropriate technologies that make practical sense with the geological deposit type.

COMMENT:

LSM should be actively moving away from cyanide towards chemically benign processing technologies.

Performance Area 4: New Projects, Expansions and Resettlement

COMMENT:

I find it difficult to understand an instance of when forced resettlement is ever warranted.

QUESTION 1

Does the scope, content, and narrative style of the consolidated standard meet your individual expectations and the collective industry expectation for responsible production practices?

Response: 4: Exceeds expectations

QUESTION 2

Do the requirements meet your expectations for being sufficiently clear to support consistent and practical implementation and to achieve necessary performance improvement?

Response: 3: Meets expectations

I think we have a ways to go before we can fully realize mining as something other than a necessary evil. I hope we one day get to a place where we treat mining as an ecosystem service, in balance with others, as opposed to something we have to mitigate. Humans will always need earth materials, and we need to progress in order to do this within frameworks of strong sustainability.

QUESTION 3

From your perspective, does the three-level performance structure (Foundational, Good, Leading) of the Consolidated Standard meet your expectations for providing an effective on ramp and clear articulation of good practice and effective path to continuous improvement?

Response: 3: Meets expectations

Document:
Claims

QUESTION 1

We would value perspectives on a few additional questions related to threshold of performance associated with achievement claims. Please click here/ see page 11 of Reporting and Claims Policy.

Response: No Response