

CMSI Consultation Response

Respondent Details

NAME

john metzger

COUNTRY

United States

PERMISSION

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

STAKEHOLDER

Supplier / business partner

ORGANISATION

AssetAssurance Monitoring

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

12. How would the Board be renewed over time?

COMMENT:

A weighted preponderance of Mining staff over stakeholders and indigenous representatives ... WHY? More of the Same Same.

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: 2: Below expectations

QUESTION 2

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

Response: unsure

Document:
Assurance

1. Introduction

COMMENT:

further creation of reviewing consultancies, certification requirements for assurers, annual updating 2-3 cycles for realignment, and ongoing education can stress already limited staff availabilities and time schedules. Where are the money resources for this training and certification, recertification, meetings to have meetings

... in addition to mine staff responsibilities ? Why not use organizations, professional cadres/consultants, and invite educational and professional training staff to offer curricula for the service?

QUESTION 1

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

Response: 2: Below expectations

Document:
Standard

Introduction

SECTION: Introduction

COMMENT:

4 (a) - "(and can be verified by an assurance provider). Early in the Document a term is used that is not defined "Assurance Provider".

What is an Assurance Provider? And What "standards" are a part of their certification or mandate as an assessor of "Assurance"?

Overarching Glossary

SECTION: Overarching Glossary

COMMENT:

Assurance Providers mentioned 6 times with no definition of what it is, what the "certification" of Assurance Providers is, how long, and ... WHY?

COMMENT:

Monitoring: Specific defined methods (NONE LISTED or REFERENCED) and/or metrics (NONE LISTED or REFERENCED) to inform baseline assessments or conduct an

internal review of effectiveness of implemented measures. (e.g. regular, consistent data collection and feedback from various sources)...

Who validates the data, defines its frequency, necessity to allow operations, alert, warn , or limit ?

How long a history is required?

How Often is DATA assessed ... Hourly, shift, daily, every 3 years ?

If more than 24 hours, who assures that data is recovered, recommenced? What appears in lieu of data?

Who safeguards the RAW data, and for how long.

No data archive ? No ongoing certification

Performance Area 1: Corporate Requirements

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Foundational Practice

COMMENT:

"Identify an individual(s) from senior management to be responsible for corporate-wide sustainability practice and performances"

If these seat/seats are not filled ? or in transition? Who assures on-going and carry-over compliance. Can you be compliant without these seats filled? Without signed over authority and presence?

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Good Practice

COMMENT:

Establish board and senior management-level accountability and internal reporting processes for the risk management, governance, and oversight of corporate-wide sustainability practices and performance ...

Should include specific language to include lineworkers, or contractor staff if a Contract-Mining operation.

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Good Practice

COMMENT:

GOOD PRACTICE – "Integrate sustainability metrics into senior executive compensation"

WHY? They are not making enough. What about locking in % increases for operating and support staff who are making it possible?

SECTION: 1.2 Sustainability Reporting, Foundational Practice, 2

COMMENT:

Why is this annual? It should be a 1 page itemization and highlighting of the core effort, updated quarterly or @x a year.

SECTION: 1.3 Transparency of Mineral Revenues, Leading Practice, 3

COMMENT:

"Include material payments to governments in the independent assurance of sustainability or financial disclosures."

Payments should include full transaction details.

SECTION: 1.4 Risk Assessment, Foundational Practice, 1

COMMENT:

"1. Identify an individual to be responsible to assess risks associated with the Facility's activities to local stakeholders and rights-holders, workers and the environment."

This cannot be ONE PERSON. A TEAM OF THREE and two sets so that the TEAM is always available across shifts and annual programs.

SECTION: 1.4 Risk Assessment, Good Practice, 3

COMMENT:

*“Conduct an internal review and update the risk register annually.”
quarterly at most.*

SECTION: 1.5 Crisis Management and Communications, Foundational Practice, 3

COMMENT:

*“3. Designate a senior executive to be accountable for the crisis response and communications planning.”
NOT ONLY 1 person. Continuity is crucial.*

Performance Area 2: Business Integrity

SECTION: 2.2 Business Ethics and Accountability, Good Practice

COMMENT:

Add Monitoring with regular monthly technical and status shares for TSF, ESG, Environment, and Stakeholder awareness.

SECTION: 2.2 Business Ethics and Accountability, Leading Practice

COMMENT:

Share overall Corporate site asset Monitoring Matrix with all great and good efforts to engage safety, ESG, and where challenges remain. Update every 6 months.

SECTION: 2.2 Business Ethics and Accountability

COMMENT:

Add a section on All site Monitoring, assessments, and dissemination of general site status, compliance, and awareness.

Performance Area 3: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Foundational Practice

COMMENT:

Define the Responsible Supply chain for all to see.

COMMENT:

Define Due Diligence or do diligence.. what is DUE in a foundational practice – and what can be done similarly (do diligence)?

SECTION: 3.2 Responsible Mineral Sourcing, Leading Practice

COMMENT:

Define remedy .. Is it money, acts, money and acts, set asides, reparations? why so general? Afraid of?

COMMENT:

There are so many general statements here that it's basically a checklist of ifs and ors. Are there suggested models for these documents that are also vetted by the project team?

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.2 Land Acquisition and Resettlement, Foundational Practice, 1

COMMENT:

"wherever possible" ????????

SECTION: 4.2 Land Acquisition and Resettlement, Good Practice, 7

COMMENT:

"Publicly disclose the engagement processes, impacts, plans and progress related to involuntary physical and/or economic displacement."

SECTION: 4.2 Land Acquisition and Resettlement, Leading Practice, 4

COMMENT:

Publicly disclose the results of the independent review of the resettlement action plan and, if applicable, the livelihood restoration plan, while protecting the confidentiality of affected stakeholders and rights-holders.

SECTION: 4.2 Land Acquisition and Resettlement

COMMENT:

If the EISA totals a view that the Project unduly affects peoples , environment etc, and suggests an unviable equation – how is this transparently communicated and what happens next ? Moreover, who/what oversees that aspect of the "practice" .. the mining company ?

Performance Area 5: Human Rights

SECTION: 5.1 Human Rights, Good Practice, 1

COMMENT:

"Publicly disclose a human rights policy consistent with the UN Guiding Principles on Business and Human Rights (UNGPs)."

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: 2: Below 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: 2: Below expectations

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

2. General Requirements for all Consolidated Standard-Related Reporting & Claims

COMMENT:

This whole permission thing is so 1970s how can you become dynamic and interactive in te process with these rote, archaic, and destined for the shelf manner and processes?

COMMENT:

This will cost annually at least \$100,000 in logistics, manner, and staff time, potentially 2X and more .. a new tax on the perception of applied and due diligence already mandated.

5. Monitoring and Enforcement

COMMENT:

Now creating a Standards police. Silly and counter to the whole engagement process. The results goal should be to raise the open and regular reporting to a recognized level voluntarily and without needing to be identified by a separate "standard" that is again a resources and purchase for participation environment.

COMMENT:

More effort and detail ...is spent here than on describing regular data monitoring and contextual components of material that support the actual practice of achieving the "standard".

6. Review of this Policy

COMMENT:

Indeed who will review, the reviewers ?

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**

Specific details of the assessable, measurable, and reportable data on TSF performance OBVIOUSLY need to be included. Without clear guidelines on data types, acquisition minimums, and the status or performance of the assets in question ... what is the purpose in saying you have data, when you do not have to exhibit or report it ?