

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Supplier / business partner

ORGANISATION

Anonymous

## COMMENTS & QUESTIONS BY DOCUMENT

Document:  
Governance

### 1. What is the vision?

COMMENT:

*Consider representation on the Board or Mining and Value Chain Committees from mining industry service providers like engineering or geoscience firms that provide services related to mine planning, or environmental management.*

*When we consider that some mining companies rely heavily on these firms, including in some cases the service firms acting even as EOR, having representation from this part of the industry would be valuable*

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: No Response

## Performance Area 1: Corporate Requirements

SECTION: 1.4 Risk Assessment, Leading Practice, 1

COMMENT:

*As stakeholders and rights-holders are defined separately in the glossary, right-holders should also be engaged in external risk assessments (where applicable)*

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## Performance Area 12: Stakeholder Engagement

SECTION: 12.1 Stakeholder Identification and Engagement, Leading Practice

COMMENT:

*Consider a requirement for feedback loops which clearly identify how stakeholder and rights-holder feedback in integrated into actionable changes at the facility.*

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## Performance Area 13: Community Impacts and Benefits

SECTION: 13.2 Community Development and Benefits, Leading Practice, 5

COMMENT:

*Consider a requirement for inclusion of an inclusive opportunity framing workshop, which includes identifying infrastructure that would otherwise be removed for "typical" closure planning, which could be incorporated into future land use(s) that are of benefit to future economies.*

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## Performance Area 14: Indigenous Peoples

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Good Practice, 9

COMMENT:

*To align to best practices around FPIC, consent is not intended to be a fixed or one-off process and is subject to being reconsidered based on the emergence of new information.*

*Consider revising the Good Practice required to "maintain and monitor the Implementation of the terms.." to "Review the terms of the agreement and commitments with Indigenous Peoples on a Defined Frequency".*

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

COMMENT:

*Consider the addition of a requirement in the Good Practice category to regularly identify and map affected Indigenous People. As more information becomes available about rightsholders traditional or asserted territory, it is important to continually review and revisit the Indigenous Peoples map*

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## Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage Identification and Management, Leading Practice

COMMENT:

*Consider revising the Leading Practice requirements to include guidance on permissions for collecting and protecting data access and management rights for cultural heritage data*

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## Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Leading Practice

COMMENT:

*“legitimate avenues” may benefit from being added as a glossary term to clarify the intent.*

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## Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Foundational Practice, 5

COMMENT:

*It is important to add a step to define the durations of the referenced timeframes for short, medium, and long term in the context of item 5, and clarify that long term may exceed the operating life of the mine. If too short a timeframe is selected, the full lifecycle impacts may not be considered and the mitigation measures selected may be insufficient*

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SECTION: 18.1 Water Management and Performance, Good Practice, 1

COMMENT:

*The definition of “water balance” may be too vague to qualify as good practice. Recommend clarifying that every landform of each domain should have a landform based water and solute balance, and each domain water and solute balance should be integrated into a site wide water and solute balance model to provide for current and future understanding of inherent and residual risk with respect to water flow and quality.*

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SECTION: 18.1 Water Management and Performance, Good Practice, 7

COMMENT:

*Consider supplementing the evaluation of source control opportunities with a requirement to complete comprehensive material characterization to identify all materials with the potential to general water quality impact (ie not just potentially acid generating, but metal leaching as well)*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*The disturbed footprint of the facility may also include reclaimed areas that have had a cover system constructed. Consider a revision to the definition of contact water to exclude water that comes into contact with an established engineered cover systems.*

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## **Performance Area 20: Climate Action**

SECTION: 20.2 Climate Change Management (Facility Level)

COMMENT:

*Recommend the addition of a requirement for the inclusion of climate change impacts on closure.*

*Of note - there is no language on this in Section 24: Closure, either*

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## **Performance Area 22: Pollution Prevention**

SECTION: 22.2 Mineral Wastes, Good Practice, 1

COMMENT:

*Consider using the terminology "store" as opposed to "dispose" As this section seems to include mined rock (waste rock) materials, or potentially also low grade ore stockpiles, and there is a potential for these stockpiles to include material of future value (as per circular economy section)*

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SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

*Consider the addition of established targets/ objectives for dust deposition monitoring in addition to air emission's reductions.*

*Consider the addition of a requirement to revisit targets and objectives at regular frequency in the event requirements of sensitive receptors change throughout operations*

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SECTION: 22.6 Accidental Polluting Releases, Good Practice, 5

COMMENT:

*Consider moving "Publicly disclose any material accidental polluting releases with material adverse impacts and any associated legal actions or fines in line with internationally recognized reporting standards" from good practice to foundational practice.*

*Disclosed may be legally required in certain jurisdictions.*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*Consider the addition of a definition for "Acid Rock and Metalliferous Drainage"*

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## **Performance Area 23: Circular Economy**

SECTION: 23.1 Circular Economy Management at all facilities, Good Practice, 2

COMMENT:

*Consider the addition of mine rock (waste rock) to the requirement to "Identify opportunities to minimise the production of tailings and mine rock".*

*Precision/ surgical mining technologies may present opportunities to minimize the strip ratio.*

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## Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 10

COMMENT:

*Suggest that "defined intervals" should be revised to also include "after material changes to the mine plan".  
"Conduct a review and update the closure plan at defined intervals and whenever there are materials changes to the mine plan..."*

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SECTION: 24.1 Closure Management, Good Practice, 7

COMMENT:

*Suggest that #7 also include a requirement to estimate scenarios for unplanned closure and make adequate financials provisions*

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SECTION: 24.1 Closure Management, Good Practice

COMMENT:

*Recommend the addition of a requirement to establish rehabilitation trial areas and monitor these throughout operations to inform updates to the closure plan.*

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COMMENT:

*Recommend adding a good or leading practice requirements for:*

- engaging in progressive closure during the operational phase of a facility.*
  - reviewing and applying lessons learned from previously closed sites with similarities to the facility to inform closure*
  - developing time-bound or specifically measurable post-closure monitoring requirements*
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SECTION: 24.1 Closure Management, Leading Practice, 2

COMMENT:

*Recommend that "identify opportunities for post-mining communities" should be revised to "identify and co-develop opportunities for post-mining communities".*

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## Performance Area 7: Rights of Workers

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Leading Practice, 6

COMMENT:

*As per Section 132 of the Canadian Election Act, employees are entitled paid time off from work to vote, if their working hours do not allow three consecutive hours to vote. As such "Provide time off to workers to exercise their political rights, such as their right to vote." may be considered a "foundational practice" as opposed to "leading practice".*

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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: 3: Meets 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

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