

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

ORGANISATION

Anonymous

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: 4: Exceeds expectations

QUESTION 2

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

Response: yes

Document:
Assurance

1. Introduction

COMMENT:

Detailed documentation and process of assurance. I was left, however, unsure of how to summarize the assurance process if talking with a stakeholder or public,

QUESTION 1

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

Response: 4: Exceeds expectations

Document:
Standard

Introduction

COMMENT:

The standard does not address the exploration / development phase of the mining industry. When I discussed this with a senior representative on this omission I was informed that "it's not our industry." That makes no sense.

Performance Area 1: Corporate Requirements

COMMENT:

<https://www.trade.gov/us-foreign-corrupt-practices-act#:~:text=Under%20the%20Foreign%20Corrupt%20Practices,of%20obtai>

Many companies operating 'internationally' are subject to the Foreign Corrupt Practices Act (USA) or other equivalents. Recently, a major mining/trading company was sanctioned and fined for such activity in Africa - this is an important lesson and point for our industry and could be better highlighted and referenced in the document.

Performance Area 11: Security Management

COMMENT:

This important Area requires, in my opinion, a section for precious metals / gems which face quite extraordinary risks: violent attack, gangs, kidnappings, influence on management, cyber crime.

Performance Area 16: Artisanal and Small-Scale Mining

COMMENT:

The section requires expert input for such a complex subject, especially with gold/gems.

Performance Area 4: New Projects, Expansions and Resettlement

COMMENT:

Please consider adding exploration stages.

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: 4: Exceeds 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

Conceptual idea is great. Requires a lot more work and simplicity too.