

CMSI Consultation Response

Respondent Details

NAME

Rachel Stonehouse

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Other

ORGANISATION

Institute of Materials, Minerals and Mining (IOM3)

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

There will be a requirement to review with time.

Document:
Assurance

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:

IOM3 welcomes the vision of the initiative to contribute to simplification of the current mining standards landscape and promote continual improvement of environmental, social and governance practices along value chains.

Responsible sourcing and management of minerals and materials is essential to the transition to a low-carbon, resilient and resource efficient society.

IOM3 supports the intention that the consolidated standard and assurance process:

- Involves diverse stakeholders in the decision making*
- Drives high performance and ambition*
- Is accessible to organisations of different sizes and across geographies*
- Embodies a continuous improvement model*
- Considers the full mining life cycle and its applicability to the full value chain*
- Is open to any company without requiring paid for membership*

COMMENT:

There is a plethora of “responsible mining” standards in existence, with duplication of a number of topics. The intent set out to consolidate four standards into one is a welcome step towards simplification and consistency. It is encouraging to note the intention stated to further reduce duplication via cross-recognition with other standards. This will present a number of challenges, however, including the implementation and length of time required, as well as feasibility and practicability across the multitude of jurisdictions with active mining interests.

COMMENT:

ICMM toolkit guides, for example on community development, are very good and their use is advocated by practitioners. This should be built on to give confidence to users of the new standard and external auditors who will examine compliance and implementation.

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions

COMMENT:

Challenges often arise when disciplines such as geology, mine planning, hydrogeology, and geotechnical engineering work in isolation. This siloed approach can result in missed opportunities to address interconnected risks comprehensively. To address this, it may be valuable for Section 4 to include a specific reference to integrating technical studies—such as feasibility studies—as a collective effort rather than a compilation of separate discipline-specific studies. For instance, the feasibility study should ensure cross-disciplinary collaboration, where geotechnical design explicitly considers potential environmental and social risks associated with the mine design. Additionally, there is often a gap in determining responsibility for translating technical mine design documents into actionable assessments of these broader social risks.

The Initiative for Responsible Mining Assurance (IRMA) current draft standard for Responsible Mining and Mineral Processing V2.0 appears to have embraced this approach. It is developing a new chapter on physical stability; which includes enhanced design, quality control, monitoring, maintenance and oversight of facilities with high risks and incorporates the Global Industry Standard on Tailings Management (GISTM). This is referenced in the CSMI draft standard in the tailings section, however, there are many other high-risk areas, such as in excavations, stockpiles, tips and dumps that could be included. The past huge slope failures at

Rio Tinto's Bingham Canyon, the world's deepest open pit mine, provide examples of where early detection of initial movement and prediction of failure by the mine's integrated monitoring systems allowed for safe evacuation of staff and equipment.

Performance Area 9: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Foundational Practice, 1

COMMENT:

The intent of this section clearly emphasises the goal of eliminating fatalities and preventing occupational injuries, illness, and disease. However, this critical objective is not explicitly outlined as a requirement within the Foundational Practices. Specifically, Foundational Practice 1 under 9.1 Health and Safety Management should require organisations to publicly commit to this goal as a foundational principle. It would also align the foundational practices more explicitly with the overarching intent of the section, reinforcing the importance of safety as a core value.

Also in Section 9.1, if the term industrial hygiene is synonymous with occupational hygiene this should be explicitly referenced as this would help with global consistency. It is unclear whether good and experienced HSE professionals currently practicing would meet the criteria of "qualified hygienist" due to it being defined in the draft standard as typically being a Certified Industrial Hygienist (CIH) -which specifies a degree qualification plus at least four years of professional-level experience in occupational health and safety. The definition would benefit from being expanded to provide greater clarity on the requirements and acceptable equivalence, with supporting examples.

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**

This is a commendable initiative with welcome extensive stakeholder engagement including through the advisory groups and open consultation. The overall scope, content and narrative style meets expectations. Detailed content suggestions include: Performance Area 4: New Projects, Expansions and Resettlement Challenges often arise when disciplines such as geology, mine planning, hydrogeology, and geotechnical engineering work in isolation. This siloed approach can result in missed opportunities to address interconnected risks comprehensively. To address this, it may be valuable for Section 4 to include a specific reference to integrating technical studies—such as feasibility studies—as a collective effort rather than a compilation of separate discipline-specific studies. For instance, the feasibility study should ensure cross-disciplinary collaboration, where geotechnical design explicitly considers potential environmental and social risks associated with the mine design. Additionally, there is often a gap in determining responsibility for translating technical mine design documents into actionable assessments of these broader social risks. The Initiative for Responsible Mining Assurance (IRMA) current draft standard for Responsible Mining and Mineral Processing V2.0 appears to have embraced this approach. It is developing a new chapter on physical stability; which includes enhanced design, quality control, monitoring, maintenance and oversight of facilities with high risks and incorporates the Global Industry Standard on Tailings Management (GISTM). This is referenced in the CSMI draft standard in the tailings section, however, there are many other high-risk areas, such as in excavations, stockpiles, tips and dumps that could be included. The past huge slope failures at Rio Tinto's Bingham Canyon, the world's deepest open pit mine, provide examples of where early detection of initial movement and prediction of failure by the mine's integrated monitoring systems allowed for safe evacuation of staff and equipment. Performance Area 9: Safe, Healthy

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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: 4: Exceeds expectations

Meets expectations -the requirements overall are clear to support consistent and practical implementation and to achieve performance improvement. Revisions will be required with time. Provision of guidance can help to promote uptake in particular for smaller operations. It is important that the standard is accessible.

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

Meets expectations -the three-level performance structure is effective. IOM3 supports an ambitious approach and driving continuous improvement.

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

N/A