

CMSI Consultation Response

Respondent Details

NAME

Simon Barry

COUNTRY

South Africa

PERMISSION

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

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

Cohort International

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

The auditor qualifications need revision.

Document:
Assurance

1. Introduction

COMMENT:

There is no ISO 19011 auditor course. All the CQI Lead Auditor courses (ISO 9001, ISO 14001, ISO 45001 etc) are built on the ISO 19011 auditing guidance document.

Good basis is CQI accredited ISO 9001 Lead Auditor course.

7. Continual Improvement

COMMENT:

Typo line 3 - add 'they' after 'that' and before 'are'

COMMENT:

GISTM Compliance Guide Table 3: Auditor Skillset Associated With Each Topic and Principle of the Standard is a good and easy to understand matrix. A similar thing for this standard would be helpful.

QUESTION 1

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

Response: 2: Below expectations

The qualifications/criteria for the lead auditor should be aligned with the ISO lead auditor. It is not 19011 as that does not qualify lead auditors. they have to be qualified against a specific standard (eg 9001) using 19011 methodology.

Document:
Standard

Introduction

COMMENT:

P.3. Other standards. The way this is written implies that this is not being viewed as a priority. In reality standards exist that people understand, more standards that often do not quite align may not be helpful. It would be worth aligning standards such as ISO. They are universally recognised and their assurance systems are well established. For this standard it would make sense to cross reference with ISO standards series such as 45000 (PA 9), 30001 (PA 10), 18788 (PA 11), 45000 (PA 19). Also a clear chart showing cross reference with GISTM would be useful for both the standard and the assurance process.

Performance Area 16: Artisanal and Small-Scale Mining

COMMENT:

This is a hot topic. National laws differ greatly and can be very forceful. This makes compliance with both the standard and the law difficult. This should be clearly noted with guidance.

Performance Area 18: Water Stewardship

COMMENT:

A cross reference guide to the ICMM Guide would help here.

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

It is too ambitious. In reality the implementation will be a challenge. It has to show value.

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

See above. They are clear but how they may be accepted across the industry may be an issue.

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

Nil