CMSI Consultation Response

Respondent Details

NAME
David Ralph

COUNTRY
Canada

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

STAKEHOLDER
Non-governmental organisation (NGO) / civil society organization (CSO)

ORGANISATION
Invasive Species Council of BC Society 72 - 7th Ave South Williams Lake BC

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: No Response

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

Document: Standard

Performance Area 12: Stakeholder Engagement

SECTION: 12.1 Stakeholder Identification and Engagement, Foundational Practice, 1

COMMENT:

Specific engagement of First Nations to ensure any management plans for invasive species or other activities are sensitive to cultural impacts such as food, medicinal, and spiritual resources. The introduction of invasive species can have a profound negative impact on one or all these resources. These resources must be considered at risk in any management plans and therefore assessed for risk.

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Identify and Address Community Impacts, Foundational Practice, 2

COMMENT:

Identify potential adverse risks and impacts of invasive species and the impact of the facility's activities to prevent adverse effects that directly affect stakeholders and rights-holders. Implement measures using the mitigation hierarchy.

SECTION: 13.1 Identify and Address Community Impacts, Good Practice, 1

COMMENT:

A process to monitor adverse impacts and progress of mitigation measures where stakeholders and rights-holders are involved in the planning and implementation is successful

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SECTION: 13.1 Identify and Address Community Impacts, Leading Practice, 3

COMMENT:

Work with relevant stakeholders and rights-holders to strengthen decision-making an organizational capacity to manage invasive species and the success of the ongoing impact mitigation programs after the productive life of the Facility.

Risks to animal and human health from toxic plants or risks to the availability or safety of drinking water for communities from pathogens or aquatic species must be included in the risk assessment.

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Foundational Practice, 1

COMMENT:

Develop a collaborative decision-making process to facilitate Indigenous Peoples involvement regarding lands, waters, and biodiversity, including invasive species. This will build on the recognition of rights, respect, partnership, and cooperation. advance reconciliation efforts, improve community well-being, and generate economic benefits for Indigenous communities. The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) recognizes that Indigenous Peoples have the right to joint decision-making in matters that impact their traditional territory.

Invasive species can have a profound impact on native plants and animals that Indigenous people use and have used for centuries. Invasive plants can outcompete and eliminate native plants used for medicinal and cultural purposes, native or domestic food plants or crops, degrade riparian areas for fish habitat, alter wildlife migration patterns, and degrade habitat that keeps ecosystem services functioning properly. Other invasive species like feral pigs degrade the land and create prime habitat for invasive plant establishment. Invasive aquatic species like zebra mussels can reduce water quality, invasive insects can transfer disease, with both

impacts affecting people's health. Invasive species can have significant impacts on many resources that affect communities in these and other ways. Indigenous people need to be included in plans so their concerns regarding invasive species are met.

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

COMMENT:

Seek Indigenous knowledge, voices, and perspectives from local Indigenous Peoples regarding the impacts of invasive species and their management on the cultural, food, and medicinal values to respectfully apply it to inform decisions and practices. Ensure these concerns are addressed.

SECTION: 14.1 Managing Engagement, Impacts and Opportunities with Indigenous Peoples, Leading Practice, 2

COMMENT:

Ensure ongoing engagement for input and perspectives from local Indigenous Peoples regarding the impacts of invasive species and their management on the cultural, food, and medicinal values after mine closure.

Standards must include sections to ensure the specific standards recommended are being implemented.

Ensure their input and comments are received addressed and acted upon.

Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage Identification and Management, Foundational Practice, 1

COMMENT:

Engage Indigenous, agricultural, and local groups to identify the cultural heritage of the region. The introduction of invasive species can have a profound negative impact on cultural resources. These resources must be considered at risk in any management plans and therefore built into the overall risk assessment process.

SECTION: 15.1 Cultural Heritage Identification and Management, Good Practice, 2

COMMENT:

Active training of all employees and contractors to identify cultural heritage values. Training them on the impacts that invasive species can have on these cultural values is critical for their protection.

SECTION: 15.1 Cultural Heritage Identification and Management, Leading Practice, 5

COMMENT:

An advisory group is convened and develops a cultural heritage document as guidance for the management and development plans of the facility. Active training of all visitors and the public to identify cultural heritage values inherent at the facility and the community. Additionally, offer outreach opportunities and resources to these groups on the impacts invasive species can have on these cultural values is critical for their protection.

Performance Area 18: Water Stewardship

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

COMMENT:

Aquatic and terrestrial plants alter the biodiversity of native plant communities reducing their function. Aquatic organisms such as zebra mussels filter nutrients from the water and can impact water flow and cause infrastructure damage, such as in dams. Identify pathways and vectors of aquatic invasive species to potential areas of spread to the facility. Identifying established species at the facility and developing a process to map locations and prepare a management or mitigation plan. If pesticides are part of the management prescription, ensure product label recommendations and provincial or federal regulations are adhered to. Establish pesticide-free zones (PFZ) and buffer zones adjacent to water courses and bodies. Applied improperly or contrary to labels or regulations can potentially pollute water courses degrading quality. This can negatively impact aquatic organisms, both plant and animal.

SECTION: 18.1 Water Management and Performance, Good Practice

COMMENT:

Federal and provincial (state) legislation typically covers all aspects of water stewardship and management with definitive regulations of what activities are acceptable in water stewardship. Invasive species management in aquatic systems and adjacent to aquatic features varies across the world. Some jurisdictions have strict regulations while others do not.

To understand the losses or potential losses the plan develops a list of regulations required for the facility's location and identifies a list of invasive species listed in legislation.

Ensure all employees and contractors are aware of the requirements mandated around activities in or around water.

Implement the process developed to collect field inventory data, map the locations and incorporate into management plans.

All sections

SECTION: 18.1 Water Management and Performance, Leading Practice, 3

COMMENT:

Plan, design, and implement measures across the life of the Facility to address the introduction, presence, and spread of invasive species.

This would minimize or reduce the need for long-term active water management of any invasive species, that mitigates long-term risks at closure.

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 4

COMMENT:

Collaboratively working with stakeholder and rights-holder water users both upstream and downstream to identify, report and collect baseline data on invasive species in the watershed including pathways and vectors for invasive species spread. Develop a management plan for the invasive species present and species that are threatening should they become established in the area.

Invasive aquatic plants such as milfoil, parrot's feather, hydrilla, purple loosestrife, fish such as carp, other vertebrates, diseases and pathogens may not be present but should be considered as potential new introductions.

Not specifically addressed is the reduced water quality caused by invasive aquatic organisms both plant and animal. Zebra mussels clog water facilities reducing and significantly changing aquatic food webs. Invasive

aquatic plants can cause reduced water flow and impact natural filtration systems. Invasive terrestrial plants adjacent to water courses can cause soil destabilization resulting in increased siltation and turbidity of water.

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 3

COMMENT:

Implement the management plan with a consistent approach and standards that prevent the introduction and establishment of invasive species and management of them if present. The plan needs to address consistent approaches addressing pathways and vectors through use of motors, vessels, fishing areas, etc., and be included in any agreements. As well, identify water resources, standardized measures, and processes to identify invasive plants that threaten invasion or are present on the landscape. Invasive plants reduce or eliminate the native plant species that comprise a healthy, water-retaining landscape. Invasion and elimination of native plant communities by invasive plants reduces the ecological services that provide mitigation to flooding, and excess water runoff. Rooting systems of native plants have evolved to have excellent soil-holding properties that flooding impacts while invasive plants do not have the same soil stabilizing properties in their roots, and slopes open to soil erosion. Re-vegetation of wildfire areas with appropriate native or domestic species that are quick to establish is important for successful soil stabilization. Invasive plants are often the first invaders to bare soil where fire has removed all desirable competing and soil stabilizing vegetation. Include invasive species best management practices.

Plans must include a balanced approach that addresses the need for safe and stable landforms

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SECTION: 18.2 Collaborative Watershed Management, Leading Practice, 1

COMMENT:

Funding for community stakeholders and right-holders to facilitate their involvement in collaborative meetings to exchange information, provide input, and identify their priorities regarding the biodiversity of the area.

Set up monitoring systems to monitor and evaluate water quality over time whether during the mine operation and after closure

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Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 6

COMMENT:

Invasive species are recognized as one of the five direct drivers of biodiversity loss, alongside land-and-sea-use change, direct exploitation of organisms, climate change, and pollution. By re-establishing and maintaining self-sustaining ecosystems and landscapes in the areas of a facility, the facility can work towards achieving a Net Positive Impact on biodiversity. The Global Biodiversity Framework's goal is to achieve a global reduction in negative impacts on biodiversity. It consists of twenty-three action-oriented targets, with invasive species being the focus of six. The targeted six calls to eliminate, minimize, reduce, and/or mitigate the impacts of invasive alien species on biodiversity and ecosystem services, and to reduce the rates of introduction and establishment of priority invasive alien species by at least 50% by 2030. Actions towards achieving this goal include identifying and managing key pathways, preventing invasive species introduction and establishment, prioritizing pathways, sites, and invasive species, and eradicating or controlling invasive alien species, especially in priority sites.

All invasive species have an impact on the proper functioning of ecosystem services. Aquatic and terrestrial plants alter the native plant communities reducing their function. Aquatic organisms such as zebra mussels filter nutrients from water.

Through predation, competition for resources like food and water, and transmission of diseases, invasive species are causing the decline of native species and disrupting the important interactions that contribute to healthy native ecosystems. They compete with and replace native species. Reducing integrity and stability of slopes, hillsides, and flowing water shorelines.

Develop a process for identifying and understanding the balance between the existing ecosystem and flora and fauna communities that exist at the facility and in surrounding areas. Develop a biodiversity plan to address the negative impacts of invasive species on the local ecosystems.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 2

COMMENT:

Ensure a biodiversity management plan includes identifying significant impacts to the values and and put into action and will include,

Prevention - is the safest, easiest, and most cost-effective method of invasive species management, involving strict adherence to best practices. Identifying, minimizing, and/or eliminating pathways of spread are key actions to prevent introduction and spread. Prevention can be supported by best practices such as installing cleaning stations for vehicles and equipment, sourcing clean seed mixes with certificates of analysis, using soil, gravel, and other materials from sources free of invasive species.

Surveying - for the presence or signs of invasive species through systematic and targeted processes is required to inform decision-making about management interventions. Remaining current on new and priority invasive species at a facility is critical to understanding what threats exist in the area.

Early Detection and Rapid Response (EDRR) - develop and coordinate a set of actions to eradicate new invasive species before they become established. This framework can be used as a model for developing EDRR plans for a facility.

Integrated Pest Management (IPM) - involves managing invasive species through integrated pest management (IPM) to minimize damage effectively, economically, and in an environmentally sound manner. IPM is a systematic decision-making process that aims to prevent pest problems, and to determine what actions to take if problems occur. IPM uses a combination of tools and approaches adapted to environmental characteristics, species biology, and site-specific priorities, and relies on timely evaluation and monitoring.

Monitoring - for invasive species has two main objectives: long-term tracking of species populations over time and evaluating the efficacy of treatment efforts. This provides valuable data to assess the overall effectiveness of the management strategy and is essential to inform adaptive management.

Raising Awareness through Education and Training provides training to facility employees and contractors and people living in surrounding areas on the importance of identifying and reporting invasive species to support prevention and enhance both EDRR and IPM efforts.

Local stakeholders and rights-holders will receive excellent knowledge of how native species biodiversity contributes to the well-functioning of ecosystem services. Hence, they recognize the lowering of service capacity and quality when invasive species establish and affect the ecosystems. They can contribute added value to developing and supporting the implementation of management plans to mitigate invasive species establishment impacts. First Nations community members, especially elders and resource management staff have excellent historical knowledge of the region's biodiversity to draw on.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Leading Practice, 1

COMMENT:

Following large-scale invasive species treatments, it may be necessary to rapidly restore treated areas, as newly disturbed soils are often the first colonized by early successional invasive species. Aggressive restoration, ideally with native species, is the goal; however, in some situations, non-invasive agronomic species may be the better option to compete with and fend off, invasive species establishment.

Educating visitors and the public on the harmful impacts that invasive species have on the biodiversity of ecosystems and native plant communities, as well as educating visitors on awareness

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Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance, Foundational Practice, 1

COMMENT:

Invasive species legislation exists on federal, provincial (state), and local government levels. A register of existing applicable invasive plant or species regulatory statutes or legislation should be compiled. Reference the requirements and/or species listed before any surveys/inventories or landscape monitoring to ensure compliance for any listed species.

SECTION: 2.1 Legal Compliance, Good Practice, 2

COMMENT:

Compliance with regulations and legislation regarding required practices for invasive species.

SECTION: 2.1 Legal Compliance, Leading Practice, 1

COMMENT:

Regular review of emerging legislation to stay current with updates and changes.

Ensure that activities and practices in and out of the mine facility meet the jurisdiction's federal, and state (federal, province, local) regulatory requirements regarding practices related to invasive species. This requires ensuring strong proactive practices to avoid the introduction of invasive species to and across the mine facilities.

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Foundational Practice, 3

COMMENT:

Climate change and invasive species are problematic issues on their own, and they also interact to produce effects that are worse than their independent impacts. Climate change can make ecosystems more vulnerable to invasive species, and invasive species can worsen the impacts of climate change. Together, these two stressors can have diverse social, economic, and environmental impacts. Climate change and invasive species effects are most affected by, more severe storms, increased drought, warming, rising oceans, and loss of species. These factors change the movement and expand native and invasive species' traditional habitat. Ecosystems affected by invasive species are more vulnerable to the impacts of climate change. In habitats that are becoming warmer and drier due to climate change, invasive plants can serve as additional fuel for wildfires, resulting in more frequent and severe fire events. Risk assessments must be considered and developed to mitigate the effects of climate changes at the facility. Invasive plants must be factored into the assessment as invasive species are one of the top five drivers of biodiversity loss. This suggests that invasive species can reduce carbon sequestration through their impacts on biodiversity and are a poor sequester and storer of carbon compared to native plants, especially grasses.

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Good Practice, 1

COMMENT:

Implementing the assessment process that includes invasive species in the context of mitigation activities. Engagement with stakeholders and rights-holders is required to identify cultural, landscape, and ecological interests in the assessment and planning of actions.

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Leading Practice, 3

COMMENT:

Factor in invasive species in the risk assessment and reclamation prescription over 30 years or more for climate change mitigation factors. If over fifty years a 2-degree increase occurs assess what the potential implications would be and what actions may be taken.

It is a beneficial practice to include invasive species in the assessments over the duration.

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Foundational Practice, 1

COMMENT:

A facility's tailings management system must reflect comprehensive management of all invasive species both aquatic and terrestrial, with an emphasis on invasive plants. If invasive plants are left on tailings and unmanaged, they will establish and be a perpetual source of spread in the facility property and beyond to surrounding areas. Tailings would be ideal sites for invasive plants as they flourish in bare soils and are often first colonized by early successional invasive species. A management plan for invasive plants, or other species, must be developed for tailings. As part of the plan consider the disturbed ground and how to address it. This would mitigate the spread of invasives that, without

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SECTION: 21.1 Tailings Management, Good Practice, 4

COMMENT:

Implement the management plan, with the re-vegetation of bare soils a priority, to prevent the establishment of new invader species and resist the re-invasion of any species that are controlled or eliminated.

Engagement with stakeholders and rights-holders is required to identify cultural, landscape, and ecological interests in the management plan actions.

SECTION: 21.1 Tailings Management, Leading Practice, 1

COMMENT:

The reclamation process and activities include native species for revegetation, which creates a healthier ecosystem that more closely resembles the site prior to mining activities.

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Foundational Practice

COMMENT:

Develop management plans for the facility during its life and after closure needs to include the disposal of invasive plants and other species in the invasive species management, especially terrestrial plants. Must include disposal of material and biomass after using manual or mechanical methods as it is important to reduce its further spread. Assessment of the hazards and risks of all hazardous materials entering the Facility. Prevention is the safest, easiest, and most cost-effective method of invasive species management, involving strict adherence to best practices. Identifying, minimizing, and/or eliminating pathways of spread are key actions to prevent introduction and spread. Surveillance of equipment, vehicles, construction materials, supplies, crates, etc. entering the facility premises should be inspected for invasive species. The species will determine what parts or signs of a species the inspections are looking for as species hitchhikers.

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

Implementing preventative actions in your management plan to address the introduction of invasive species to the facility.

Invasive plants must not be composted because viable plant parts and seeds can re-enter the soil system and infest new areas. Disposal by incineration is a viable disposal option as is deep burial. Burial depths should be deep enough so rhizomatous plants like knotweeds cannot regrow. A disposal policy for various invasive species must be in place to stop of circle of re-infestation and further infestation of facility sites.

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Leading Practice

COMMENT:

Develop management plans for the facility during its life and after closure needs to include the disposal of invasive plants and other species in the invasive species management, especially terrestrial plants. Must include disposal of material and biomass after using manual or mechanical methods as it is important to reduce its further spread.

Implementing preventative actions in your management plan to address the introduction of invasive species to the facility.

Invasive plants must not be composted because viable plant parts and seeds can re-enter the soil system and infest new areas. Disposal by incineration is a viable disposal option as is deep burial. Burial depths should be deep enough so rhizomatous plants like knotweeds cannot regrow. A disposal policy for various invasive species must be in place to stop of circle of re-infestation and further infestation of facility sites.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Foundational Practice, 2

COMMENT:

Develop invasive species inventories and management plans for facility in areas for closure. Consider inventory of species that are present, and management activities that would continue after closure to achieve effective and complete control of invasive species. These closure activities should continue for a pre-determined time after closure to achieve management goals.

SECTION: 24.1 Closure Management, Good Practice, 6

COMMENT:

Implement invasive management plans for the facility early in the mine life to ensure clear objectives and goals, not only during operational phase, but also after closure. Closure can take many years and goals and objectives must be clearly identified to ensure a successful reclamation process that meets the invasive species management objectives and goals.

SECTION: 24.1 Closure Management, Leading Practice, 2

COMMENT:

Collaborate with local stakeholders and rights-holders to identify opportunities for post-mining reclamation efforts. These could include input on environmental and cultural considerations in closure plans. Employment opportunities to manage, inventory, and monitor invasive species in pre-closure and post-closure management plans. This would also facilitate an opportunity for training local stakeholders and companies in all aspects of invasive species, including facility employees.

Financial provisions should be allocated for the costs of achieving these goals, which may take many years after closure

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Performance Area 3: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Foundational Practice, 2

COMMENT:

Identify, implement, and ensure ongoing monitoring of best management practices to identify invasive species that are at a high or very high risk of introduction to a facility based on the country of origin in the supply chain. Establish a risk assessment process based on invasive species' potential to enter, establish, and spread at a facility. Species risk assessments are typically available from the federal or provincial/state agencies that lead invasive species programs. Investigate international standards or restrictions that address risk assessments associated with pathways and vectors. The risk assessment must identify any potential invasive species that exist at the source that are a concern for movement to a new facility. This may involve a risk assessment of species at the source. Identifying, minimizing, and/or eliminating pathways of spread of invasive species are key actions to prevent introduction and spread.

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Good Practice, 3

COMMENT:

Facilities must develop a list of high or very high-priority invasive species and should identify any business relationship where they have experienced the movement of materials or supplies contaminated with invasive species and have or could have resulted in an introduction to their facility. Remedial action is taken to close the pathway of introduction by developing protocols for the inspection, cleaning, and decontamination of vector materials.

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Leading Practice, 3

COMMENT:

Set up and implement a due diligence system for responsible sourcing of materials and equipment from countries and or sources that have invasive species of concern to the region where the facility is located. This would reduce the invasion of invasive species to the facility and subsequent spread to other area outside the facility.

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Foundational Practice, 1

COMMENT:

Surveying for the presence or signs of invasive species through systematic and targeted processes is required to inform decision-making about existing operations or design changes to the facility, to help determine management actions and interventions to establish species, and potential new introductions. Remaining current on new and priority invasive species in all facility locations is critical to understanding what threats exist in the area. Coordinating a set of actions to eradicate new invasive species before they become established.

Invasive species have significant environmental, social, cultural, and economic impacts and are a consideration for new or existing projects.

Invasive species can be toxic affecting animal and human health. Cultural practices of Indigenous Peoples such as access to first foods and traditional medicines are restricted. They reduce the quality and yield of crop production.

Develop a system to assess invasive species at the facility and establish an invasive species management plan.

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Good Practice, 4

COMMENT:

Involve stakeholders and rights-holders to develop management plans which include an inventory and a plan for managing the invasive species that meets legal/regulatory obligations and requirements. Manage invasive species strategically through an integrated pest management (IPM) process to minimize damage effectively, economically, and in an environmentally sound manner. IPM is a systematic decision-making process that aims to prevent pest problems and to determine what actions to take if problems occur. IPM uses a combination of tools and approaches adapted to environmental characteristics, species biology, and site-specific priorities, and relies on timely evaluation and monitoring. IPM requires the following steps,

1. Prevention

2. Knowledge and identification of species (pathways)

3. Inventory (know baseline)

4. Determine management plan and practises

5. Implement practices

6. Monitor and evaluate (report, update management plans)

Ensure a schedule is established for monitoring invasive species locations, movement, and efficacy of management activities. Monitoring for invasive species has two main objectives: long-term tracking of species populations over time and evaluating the efficacy of treatment efforts. This provides valuable data to assess the overall effectiveness of the management strategy and is essential to inform adaptive management.

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Leading Practice, 2

COMMENT:

Invasive species assessments are conducted regularly to update the information, and the management plan is reviewed regularly.

Collaborate with stakeholders and rights-holders to identify cultural and community values to ensure they are protected through the monitoring of management plans. The management of invasive species at facilities

will mutually benefit Indigenous Peoples's stewardship of their lands and waters in areas impacted by mining activities. Collaborating with neighboring resource managers such as local agriculture producers, forest managers, conservancy land managers, Parks managers, and other land-based organizations will identify potential and existing impacts from management plans and enhance activities.

Implement a process to evaluate the impact of the management plan's success in preventing, controlling, or eliminating invasive species. This evaluation would be evaluated against good practises.

Effective invasive species management relies upon consultation and establishing meaningful partnerships. There should be specific engagement of stakeholders and rights-holders to ensure management plans for invasive species or other activities are sensitive to cultural impacts such as food, medicinal, and spiritual resources. Local stakeholders should be requested to contribute to invasive species management plans through community meetings to feel a part of the process.

Stakeholders are allies in achieving objectives and goals of the Facility plans that can affect the larger adjacent regional outcomes.

Stakeholders and rights-holders living in surrounding areas are engaged in identifying and reporting invasive species will support prevention and enhance management efforts.

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: 1: Significantly below

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: 1: Significantly below

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: 1: Significantly below

In 2023 the Intergovernmental Platform for Biodiversity and Ecosystem Services (IPBES) identified the five direct drivers of biodiversity loss as changing use of sea and land, direct exploitation of organisms, climate change, pollution and invasive non-native species. Invasive non-native species are those that arrive where they historically didn' t occur, and out-compete local biodiversity for resources such as sunlight and water. This causes the native species to die out causing a shift in the makeup of the natural ecosystem. Invasive species are not addressed directly in any of the Performance areas. We have selected sections of the CMSI document that we feel are directly connected to the impact and effects of invasive species on mining facilities, local communities, and ecological biodiversity. Invasive species should be explicitly addressed because of their major negative impact on so many natural and human systems. Invasive species management has the potential to be very beneficial to positively addressing and restoring biodiversity, addressing climate change, reclamation, and closure goals of the mine. Ideally, invasive species management is most successful in the early stages of mine planning and development. This will avoid the cost and additional mine resources to manage and mitigate invasive species over the life and closure of the mine facility. Attention to invasive species and executing plans to eliminate the pathways and vectors of spread both to and within the facility, their management, evaluation of activities, and adjusting prescriptions are responsible actions to protecting the region(s) from impacts of invasion and establishment of invasive species. Foundational activities

are a key starting point for invasive species planning, good practices are necessary to address invasive species with physical actions and leading practices go beyond the good management practices and address the root cause of invasive species and treat the cause, not just the symptoms. We hope you will consider including the comments and concerns about invasive species in the Consolidated Mining Standards Initiative. Mining operations can have a severe impact on the landscape where invasive species find places to establish, exist, and flourish. Protecting the facility and surrounding regional landscape from invasives is beneficial to local biodiversity and local community values.

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