

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

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

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: 1: Significantly below

Industry dominated and skewed

### QUESTION 2

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

Response: no

Document:  
Assurance

### QUESTION 1

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

Response: 1: Significantly below

This consolidated standard is weakening the separate voluntary industry standards while also undermining the Initiative for Responsible Mining Assurance (IRMA) standard developed by multi-stakeholder committee. It lacks credibility and any sense of being "robust".

Document:  
Standard

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

Minimum company performance requirements do not align with international standards, laws and norms for human rights and the United Nations Declaration on the Rights of Indigenous Peoples (requiring Free, Prior and Informed Consent).

The standard lacks rigorous, measurable criteria for it to be effectively implemented by companies and for company performance to be meaningfully and independently audited.

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

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

I don't find this useful. There needs to be a set of criteria that are mandatory - respecting human rights, not polluting water, adhering to FPIC with Indigenous peoples, banning upstream tailings dams, etc. The "foundational practice" isn't robust enough and doesn't provide enough assurance.