

# CMSI Consultation Response

## Respondent Details

NAME

ROBERT Magowan

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

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

ORGANISATION

InfluenceMap

## 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 2: Business Integrity

SECTION: 2.2 Business Ethics and Accountability, Foundational Practice

COMMENT:

*An additional foundational practice should be:*

*“Commit to responsible policy engagement, direct and indirect (through trade associations).”*

*The glossary can reference the forthcoming OECD Guidance on Responsible Corporate Lobbying and Political Engagement, which defines responsible political engagement as corporate political engagement in adherence to shared ethical values, principles and norms for upholding integrity, transparency, openness, and equity in public decision-making processes, with a view to ensuring that corporate political engagement activities are consistent with company commitments on matters related to responsible business conduct, including their sustainability-related goals and targets.*

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SECTION: 2.2 Business Ethics and Accountability, Good Practice

COMMENT:

*An additional good practice requirement should be inserted:*

*“Publicly disclose main public policy positions, direct and indirect policy engagement activities (including through trade associations), and relevant spending.”*

*This would bring the standard closer in line with the GRI 14 Mining Sector standard, which includes public policy as a likely material topic (and trade association memberships, contributions and policy engagement alignment as relevant disclosures).*

*The glossary can include the following definitions from the forthcoming OECD Guidance on Responsible Corporate Lobbying and Political Engagement:*

*‘Public policy position’ refers to the stance adopted by a company on a specific policy issue or regulatory act, including the specific objectives and outcomes sought by the company through its lobbying and influence activities.*

*‘Main public policy positions’ refers to public policy position adopted by a company on issues that are material to the company.*

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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

The absence of any policy engagement requirement puts the standard at odds with established investor expectations and a range of corporate standards and disclosure frameworks, including CSRD (ESRS G1-5 Business Conduct), GRI (14 and 415), OECD Guidance on Responsible Corporate Lobbying and Political Engagement (forthcoming), and the investor-led Global Standard on Responsible Corporate Climate Lobbying. This should be amended with both foundational and good practice requirements for policy engagement commitment and disclosure.

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: No Response

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: No Response

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