

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Supplier / business partner

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: 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 18: Water Stewardship

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

COMMENT:

Having and using a predictive and operational water balance should be foundational, not good practice. Foundational practice items 4, 5, and 6 are much easier to achieve, if not require, a functional water balance.

Suggest explicitly requiring that the predictive water balance consider climate change effects.

SECTION: 18.1 Water Management and Performance, Good Practice, 2

COMMENT:

Suggest this item be a foundational, not good practice item. Foundational practice items 5 and 6 would require some level of hydrogeological characterization and an operational and predictive water balance (which should be foundational, not good practice) would also require some level of hydrogeological characterization.

SECTION: 18.1 Water Management and Performance, Good Practice, 5

COMMENT:

Suggest that assessing climate change impacts to the water balance be a required part of the water balance item (ie make this part of Good Practice item #1. The other elements of this requirement (erosion, water management) can stand alone as an item of good practice.

SECTION: 18.1 Water Management and Performance, Good Practice, 7

COMMENT:

This item should be phrased so the focus isn't solely about reducing water treatment needs (i.e. remove the the final phrase: "... to minimize water.."). Not all contact water gets treated, nor does it need to. But downstream users (and the facility) might still prefer that less water becomes contact water. Simply emphasizing the goal of reducing contact water is sufficient.

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 1

COMMENT:

Hydrogeological characterization (good practice item 18.1.2) is needed to achieve this foundational practice item. Further supports the earlier recommendation that hydrogeological characterization be foundational, not good practice.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature

COMMENT:

Why the focus or sole emphasis on UNESCO sites? What about nationally or sub-nationally protected areas?

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Good Practice, 1

COMMENT:

This item is almost the same thing as Foundational Practice item #1. If you're going to implement GISTM, you need to pursue conformance. Suggest adding pursue conformance to the Foundational Practice requirement and removing this Good Practice requirement.

SECTION: 21.1 Tailings Management, Leading Practice, 1

COMMENT:

Although covered in TSM and GISTM requirements and therefore implied by this Leading Practice item, suggest explicitly requiring public disclosure/public demonstration of conformance with GISTM or TSM.

Performance Area 22: Pollution Prevention

SECTION: 22.2 Mineral Wastes, Good Practice, 1

COMMENT:

This item should be foundational practice, not good practice.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 10

COMMENT:

The closure plan should not only be reviewed and updated in response to changes in the facility's surrounding environment/stakeholders (Good Practice items #9 and #10), but should be reviewed and updated in response to operational and mine plan changes within the facility itself. Suggest making this its own Good Practice requirement.

SECTION: 24.1 Closure Management, Good Practice, 5

COMMENT:

Recommend that this item be extended further back in the decision making process. The closure plan should be prepared and designed with the mine plan and operational plans for the facility in mind. Or even better, the reverse: operational plans should be made with the closure plan in mind. As an example, waste rock dumps are built in their approximate closure configuration during operations, rather than requiring reshaping at closure. This makes progressive closure easier and makes it easier to incentive mine managers to keep closure objectives a priority.

SECTION: 24.1 Closure Management, Good Practice

COMMENT:

Good Practice level should include items focused on reducing water treatment needs at closure.

SECTION: 24.1 Closure Management, Leading Practice

COMMENT:

Leading Practice should include items on eliminating water treatment in perpetuity as a closure solution.

COMMENT:

Leading practice should include item(s) on efforts to decommission dams at closure so that they don't need to be monitored and maintained as dams in perpetuity (ICOLD and the Canadian Dam Association have guidance on this that could be referred to).

COMMENT:

The standard is silent on establishing who is responsible for long-term (in perpetuity) care of closed sites. This needs to be included, ideally at the foundational practice level. It's likely that most sites will eventually end up back with the people who live in the area and under the care of the state. Related to this, the standard is silent on establishing funding to care for a site in perpetuity - if dams aren't decommissioned and water treatment is required for some undefined period, then in perpetuity funding needs to be in place (this is beyond the actual cost of the works needed to transition to closure that's required in the standard). Self-funding in this scenario isn't likely acceptable.

Climate change should be explicitly required in closure planning, ideally at the Foundational level.

Other performance areas include items for assigning accountability and responsibility for the area (like water stewardship item 18.1.4), but closure doesn't have this requirement. Suggest adding it.

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: No Response

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

I can't comment on areas outside of my expertise, but I think that tailings, water, and closure areas (my areas of expertise) are close to sufficiently clear.

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

This aspect was cleaner and simpler than I expected.

Document:
Claims

3. Types of Reporting & Claims

COMMENT:

Whatever the performance claim standard ends up being, it needs to be really simple for the public to understand and so that it can't be easily manipulated by operators to lend the impression of better performance by tackling "easier" items and not addressing more complex ones.

The 80% standard described here is clean and simple. The 75%/75% doesn't make sense to me, so if something in that vein were chosen, it would need to be more clearly explained (perhaps with visuals).

Some kind of incentive, maybe a higher level performance claim, should be available to facilities achieving leading practice in many areas - it would be the only real incentive to move beyond good practice.

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