

CMSI Consultation Response

Respondent Details

NAME

Kjersti Hartvig Larsen

COUNTRY

Norway

PERMISSION

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

STAKEHOLDER

Industry / trade organisation

ORGANISATION

Norsk Bergindustri (Norwegian Mineral Industry)

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

6. What will the composition of the Board look like?

COMMENT:

It looks a little bit complicated and its hard to understand how this will work. How will you make sure that smaller countries og entities are represented in the committee or board? How often will they have meetings?

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

Document:
Assurance

QUESTION 1

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

Response: 3: Meets expectations

Document:
Standard

Introduction

COMMENT:

A quick link to the figure showing the structure of the 24 performance areas of the standard, which could be added under the list of relevant performance areas in each new performance area chapter.

A the start of each new section for a performance area there is a list of the other relevant performance areas. If a quick link to the figure on page 2 showing the structure for the entire standard was provided it might make it easier to see how the relevant performance areas relate to each other within the entire standard structure.

COMMENT:

A list of acronyms, preferably with a quick link within the pdf document to make it easier to use.

COMMENT:

On page 3 in what stages of the mine cycle should it apply to chapter we suggest that it should include "post-operational".

The post-operational phase of a mine is not mentioned in this section but it could also be of relevance, e.g. provision of monitoring data for remediation measures, and other direct monitoring situations.

COMMENT:

in 6 Glossary and interpretive guidance we suggest that in the sentence "A sample of key terms are called out below to assist with the review of the Standard." you change "called out" with "highlighted" or "listed"

We think that "called out" has the potential to cause confusion because it is so colloquial.

COMMENT:

An overall comment to the whole standard: Our first impression of the CMS is that it covers more areas than TSM and will be a better tool for answering the requirements from the CSRD. Its important for us that a new standard can be the one standard that our members use to answer on the criteria's in CSRD, so they don't have to do double reporting and have unnecessary costs to assurance. It is also important that CMS can be used by smaller companies and that it continues to be a standard that accepts that they can fill in only what is relevant to them. We would however suggest that it should be mandatory for everyone to do a double materiality assessment as a starting point, that will give the company a view of which areas it should report on.

Since the new standard is going to be a tool used by many countries and companies there should be a webpage with a user page for each company, where they can fill in the results from their work with the standard and the different topics. This will make it easier for the companies to use the standard and maintain the data. It will also make it easier to compare results between companies and countries.

Overarching Glossary

COMMENT:

In the sentence "Those related to human rights, as defined by the UNGPs"

it seems to be the first time that the UNGP acronym is used in the standard but the explanation in full is not given until page 32. To prevent confusion, it should be provided when the acronym is first used (i.e. on page 9).

Performance Area 1: Corporate Requirements

SECTION: 1.2 Sustainability Reporting, Leading Practice

COMMENT:

Perhaps add a link to an explanatory text for double materiality approach. Example: ESRS Double Materiality Assessment: Step-by-step guide - Nordic Sustainability

No definition of what this might be is given within the standard. At least as far as I can test by using the search function.

This is the type of terminology which is not obvious unless you already know it and the standard will be read by a very wide audience, including non-specialists.

SECTION: Glossary and Interpretive Guidance

COMMENT:

ISAE3000, AA1000, etc

Add footnote with link to the international standards e.g.:

International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information | IAASB

Performance Area 18: Water Stewardship

SECTION: 18.3 Water Reporting, Leading Practice, 1

COMMENT:

MCA Water Accounting Framework, If changed then in accordance to the referens on page 93. Why is not the water management protocoll refered to in this section is there a reason for this.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

Put in the word "new":

Prohibit new exploring or operating within World Heritage Sites and confirm any current or future operations adjacent to World Heritage Sites are not incompatible with the outstanding universal value for which they are designated and do not put their integrity at risk.

COMMENT:

Should be some differentiation for the types/reasons for World Heritage Site designation so that industrial heritage World Heritage Sites are not inadvertently excluded from future possible production? This could have an unintentional effect of preventing or making far more difficult, the production of resources from secondary raw materials (i.e. waste rock, tailings) in addition to new previously unextracted resources from old mines themselves. An example is the current U.K. focus on the possibility for extracting lithium and other green technology relevant resources present in the mines of the Cornish Unesco World Heritage Sites, which were previously of no interest for commercial production. E.g. Cornish Lithium Plc. | Lithium exploration within Cornwall, UK

In Norway both the Norwegian Geological Survey and Universities, (in addition to linked EU projects) are running projects on re-use of old mining resources.

In a specifically Norwegian context, Røros and Nordgruvefeltet are also World Heritage Sites, but it is their industrial nature which makes them so Røros Mining Town and the Circumference - UNESCO World Heritage Centre

This is clearly in a completely different category from say, the biodiversity currently being impacted by the Maduro regime's operations in Venezuela's Arco minero del Orinoco Canaima World Heritage Site.

Performance Area 3: Responsible Supply Chains

SECTION: Glossary and Interpretive Guidance

COMMENT:

The last sentence in Business relationship has a typ: "Vary" should change to "varies"

COMMENT:

Typo in Minerals or Metals Sourcing: it should be "by the company"

COMMENT:

"Recycled material", there is a typo in the sentence: Recycled material refers to minerals or metals that been previously processed,

It should be: that have been

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: 3: Meets expectations

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: 3: Meets expectations

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

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

For small and medium companies it will be important that they don't lose the chance to get Good or Leading Practice if there are requirements that are not applicable for them. There should be a differentiation and expectation based on the size of the company and the number of employees. Small and medium-sized companies have the same issues as big companies but they have less people to do the paper work. So it should be lower expectations for smaller companies than the bigger ones.