

CMSI Consultation Response

Respondent Details

NAME

Kim Ferguson

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

Supplier / business partner

ORGANISATION

WSP

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

5. What does the overall governance model look like?

COMMENT:

Embrace a lifecycle approach - this is not clear in the standard itself with closure requirements identified as being required in operations, which is great, but many of the other requirements not identified as being needed in closure or post-closure for durable responsible mining legacy.

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

Introduction

COMMENT:

While this is commendable and critical to ensure closure is integrated into the operational life of a facility, the industry is judged on how facilities are left, i.e., the legacy they leave and as such, there should be requirements applying to the closure and post-closure phase also to ensure the commitment to responsible mining is not stopped with production.

COMMENT:

By having closure as it's own area, there is limited requirement for integration of closure into other areas. Consider using the terminology of ICMM, i.e., throughout all lifecycle stages, including closure and post-closure, throughout the document to stress that all other areas must consider the entirety of the lifecycle of an asset and that responsible mining does not finish withy production

Overarching Glossary

COMMENT:

Risk is defined by ISO as threats AND opportunities. Should stick to this definition for consistency and to ensure opportunities are not lost

Performance Area 1: Corporate Requirements

SECTION: 1.4 Risk Assessment, Foundational Practice, 1

COMMENT:

1.4 - 1 = across the entire lifecycle of the facility including closure and post-closure

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response Planning

COMMENT:

Engage with stakeholders - across all lifecycle phases, including closure and post-closure, e./g., what is the emergency response in the event of a tailings failure in post-closure? How is the company ensuring the community is safe and protected when they are no longer on site?

Performance Area 13: Community Impacts and Benefits

SECTION: 13.2 Community Development and Benefits, Foundational Practice, 3

COMMENT:

Local jobs for local people can create dependency of the community which can enhance closure impact. Suggest this section be reviewed for more balanced requirements that consider the entire life cycle of the facility and may consider aspects such as alternative skills training and capacity building

COMMENT:

Does not map to closure which is where some of the most significant community impacts are realized, particularly if closure has not been considered throughout the life of the facility

COMMENT:

Does not map to closure

Performance Area 14: Indigenous Peoples

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

COMMENT:

Does not map to closure

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights

COMMENT:

Does not map to closure

Performance Area 20: Climate Action

COMMENT:

Does not map to closure

Performance Area 22: Pollution Prevention

SECTION: 22.2 Mineral Wastes, Good Practice, 1

COMMENT:

good practice 22.2 - 1 - across the entire lifecycle of the facility including post-closure, i.e., durable non-active management solutions are required

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 1

COMMENT:

24.1 good practice #1 should include indigenous peoples specifically

SECTION: 24.1 Closure Management, Good Practice, 11

COMMENT:

24.1 good practice #11 - emergency preparedness is required for full planned closure as well

SECTION: 24.1 Closure Management, Good Practice, 3

COMMENT:

o 24.1 - Good practice #3 - should include neutral and saline drainage as well - it is not always AMD and metals that creates the challenges.

SECTION: 24.1 Closure Management, Good Practice, 6

COMMENT:

24.1 - • Good practice 6: I feel this should be included under Foundational Practice, since monitoring, maintenance and management of closure and rehabilitation activities would be required to meet minimum industry standards as per the definition of "Foundational Practice".

SECTION: 24.1 Closure Management, Good Practice, 7

COMMENT:

24.1 good practice #7 - we all know the challenges of financial provision accounting for reporting purposes vs life of asset closure costs for good decision making. Good practice should reflect full closure cost estimation for use in informed decision making, not just financial provisioning which is foundation and required by stock exchange reporting rules as a minimum

Performance Area 4: New Projects, Expansions and Resettlement

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

COMMENT:

4.1 - 2 = including impacts at closure and post-closure so they can be mitigated / avoided during design and operations

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: **2: Below expectations**

Closure must be integrated to be effective, as per the ICMM good practice guide. The way closure is laid out in this standard silos it and continues to perpetuate the ineffectiveness of integrated closure. All other performance areas should also have considerations for the full life cycle including closure and post-closure

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: 2: Below 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

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