

# CMSI Consultation Response

## Respondent Details

NAME

David Clarry

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

Supplier / business partner

ORGANISATION

Innotain Inc.

## COMMENTS & QUESTIONS BY DOCUMENT

Document:  
Governance

### 1. What is the vision?

COMMENT:

*To provide the best foundation for the ongoing governance of the CMS the "Vision" should be expanded to make clearer the purpose of the CMS as a mechanism to support responsible production of minerals to serve society's needs, and that achieving this purpose requires the balancing of different stakeholders needs to achieve a standard that is sufficiently practical to be implemented by a substantial portion of mining companies, and sufficiently robust to ensure the impacts of mining on society and the environment are acceptable. It should somehow be clear that the mandate of the Legal Entity is to find the right balance, and that a standard that is not achieving implementation is not achieving the vision.*

### 2. What is the mandate of the Legal Entity to deliver this vision?

COMMENT:

*Suggest the mandate also specifically include the responsibility to establish and maintain processes that will navigate the inevitable healthy conflicts between the expectations and ambitions of of different stakeholders and stakeholder groups.*

*(the CMSI partners have achieved this balance successfully by the implicit understanding of this navigation, in writing out a governance document to hand-off this process I believe this navigation of these (healthy) conflicts should be recognized more explicitly)*

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: 2: Below expectations

(see my comment proposing more clarity on the fundamental purpose / goal of the standard)

QUESTION 2

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

Response: **yes**

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:

*(Unless I missed it) I believe that the standard should specifically recognize and give credit for implementation of ISO 14001 and ISO 45001*

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## Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management

COMMENT:

*The inclusion of the MAC Tailings Management Protocol here is very important. The MAC protocol is the most robust, practical and dynamic (with a process and structure for continuous improvement) in the world. It would be a loss for the goals of the standard if the MAC (current TSM) protocol, supporting documents, and continuous improvement processes were dropped. The CMS governance should also define how the MAC tailings protocol process can be supported and how the CMS governance will track that the MAC protocol still represented the level of practice targeted by the CMS.*

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

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 support Example 1 - Good Practice in a simple 80

I agree that tailings management might be required to be at the "Good Practice" level to make a performance claim - tailings is one of the most complex areas and performance in this area is possible least visible to stakeholders.

Fully support the idea of a higher claim level that would be based on achievement of some defined proportion of "Leading Practice" scores