

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

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: no

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, Foundational Practice, 7

COMMENT:

“material non-compliance” : Define expectation of material non-compliance on a FAQ. Besides the definition on the Glossary, it could provide more details on the expectation about it on FAQ.

SECTION: 18.1 Water Management and Performance, Foundational Practice

COMMENT:

It would be good if we added another requirement talking about compliance with all commitments such as internal policies, procedures, legal, voluntary commitments, etc.

COMMENT:

It would be good if we added a requirement here to have a list of stakeholders that have interest in water, including a list of water users in the watershed

SECTION: 18.1 Water Management and Performance, Good Practice, 3

COMMENT:

It would be good to have a FAQ explaining this question since different jurisdictions assess this in different ways. Or even in the glossary below include definition of "cumulative effects"

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

COMMENT:

"range of potential climate change scenarios" : Add FAQ for this item

SECTION: 18.1 Water Management and Performance, Leading Practice, 4

COMMENT:

"independent review of effectiveness" : Define on FAQ the expectations for this item. Besides the definition on the Glossary, it could have some examples about it on FAQ for each section where it is mentioned.

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 1

COMMENT:

"Where IWRM processes are mature" : What is mature? Maybe define that somewhere or make a reference

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 3

COMMENT:

Also inform facility management about IWRM progress

SECTION: 18.3 Water Reporting, Leading Practice, 2

COMMENT:

Although defined in the overarching glossary, it would be good to better define the difference in scope between "independent audit" and an "independent review".

Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

Suggest adding a requirement to identify, formalize and regularly update the key groups of stakeholders that should know and be informed about biodiversity matters.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 6

COMMENT:

If not material then we should disclose why as well.

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Leading Practice, 4

COMMENT:

Define independent review to make sure it is consistent across the protocols

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Leading Practice, 1

COMMENT:

Suggest adding the word "MATERIAL" to scope 3 GHG emissions.

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Leading Practice, 2

COMMENT:

Same as Leading Practice #1, suggest adding the word "MATERIAL" to scope 3 GHG emissions.

SECTION: 20.2 Climate Change Management (Facility Level), Good Practice, 4

COMMENT:

transition risks should also be assessed by the facility in coordination with corporate

SECTION: 20.3 Annual Climate Change Public Reporting, Good Practice, 1

COMMENT:

item b : consider moving it to leading practice

SECTION: 20.3 Annual Climate Change Public Reporting, Leading Practice, 1

COMMENT:

Item c: should disclose the transition risks as well.

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management

COMMENT:

Suggest adding an additional requirement under Good Practice to: include waste as part of business process (like budget) to address the risks

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management

COMMENT:

Suggest adding an additional requirement to include assurance of publicly disclose data as Leading Practice

SECTION: 22.2 Mineral Wastes, Foundational Practice, 3

COMMENT:

It would be great to have a FAQ to help us understand the expectation and evidence needed

SECTION: 22.2 Mineral Wastes, Foundational Practice

COMMENT:

Suggest adding a requirement under Foundational Practice to: define responsibilities for mineral waste management.

SECTION: 22.2 Mineral Wastes, Good Practice, 1

COMMENT:

Suggest edit to add the word 'geotechnical' in addition to geophysical and geochemical stability.

SECTION: 22.2 Mineral Wastes, Good Practice

COMMENT:

Should we also add something related to consider climate change in the design of critical waste facilities?

SECTION: 22.3 Non, GHG Air Emissions

COMMENT:

Suggest adding a requirement under Foundational Practice to: add definition of responsibilities and training

SECTION: 22.3 Non, GHG Air Emissions

COMMENT:

Consider including assurance on the data publicly disclosed as a requirement under Leading Practice.

SECTION: 22.4 Mercury, Foundational Practice

COMMENT:

Suggest adding a requirement under Foundational Practice to: a) Assign Responsibilities to manage Mercury and b) Provide training to key personnel

SECTION: 22.6 Accidental Polluting Releases, Foundational Practice, 1

COMMENT:

Suggest adding a FAQ to define expectation and scope of this risk assessment

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 2

COMMENT:

Define what is expected as "material" in a FAQ or glossary

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 3

COMMENT:

Define "residual adverse impact" in the glossary or FAQ

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 4

COMMENT:

of any accidental polluting releases or just material? Please clarify

SECTION: 22.6 Accidental Polluting Releases, Leading Practice, 1

COMMENT:

Add Engagement with Stakeholders (especially communities) on accidental releases simulations

SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Foundational Practice, 1

COMMENT:

"informed by permit requirements": add another reference since in some jurisdictions, the requirements could not be well defined or be very light

SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Good Practice, 3

COMMENT:

"Monitor the effectiveness": add a FAQ to clarify how we can show evidence to monitor effectiveness

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy Management at all facilities

COMMENT:

Consider reviewing the items that could be included in previous topics (waste and tailings). That could create double work at the facilities and confusion depending on responsibilities definition.

Maybe just leave the items that can't be addressed on other topics.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Foundational Practice, 2

COMMENT:

"with regulatory requirements": consider adding another reference since there are jurisdictions where closure requirements are inexistent or very limited

SECTION: 24.1 Closure Management, Good Practice, 2

COMMENT:

"identify opportunities": clarify expectations of what opportunities mean in the case of closure

SECTION: 24.1 Closure Management, Good Practice, 6

COMMENT:

at a pre defined frequency

SECTION: 24.1 Closure Management, Good Practice, 7

COMMENT:

"Estimate the cost to implement": including environmental, social and any other aspect that could impact the estimated cost

SECTION: 24.1 Closure Management, Leading Practice, 2

COMMENT:

"Collaborate": Edit to read 'regularly' collaborate or define a frequency based on closure plan activities

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

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