

# CMSI Consultation Response

## Respondent Details

NAME

Sally Johnson

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Other

ORGANISATION

Fairfields Consulting

## 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 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 2

COMMENT:

*Unless KBAs are afforded protection, there are no restrictions, which effectively means that you are not asking for anything additional in relation to KBAs. This is a shame. It would be helpful to say that companies should not adversely affect the values, that have led to that site being designated a KBA.*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 3

COMMENT:

*Nothing is said about no net loss of what. Is it no net loss of all values impacted or are you focussing on priority values. You should align with IFC PS. Net gain for Critical Habitat and no net loss of natural habitat. You need to specify species and ecosystems.*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Leading Practice, 3

COMMENT:

*Collaboration on the achievement of offsets is integral to good practice and should not be at the leading practice level.*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature

COMMENT:

*There is no mention of supply chains, like large amount of aggregate or borrow for infrastructure or food acquired in the camps, oil, diesel etc whose acquisition may impact on natural and critical habitat. The expectation here is that the company has a supply chain policy that assesses impacts on biodiversity.*

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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

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: 2: Below expectations

Foundational practice level is problematic as it risks creating the misperception that this is sufficient to get some form of recognition for implementing the standard. Its very important stands Foundational practice is problematic as it creates a risk that those implementing the standard should get recognition for basic practices that could lead to significant loss of biodiversity. It must be clear that these are initial but insufficient steps to afford an acceptable level of protection for biodiversity. No mining project should be implemented that does not meet good practice.

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