

# CMSI Consultation Response

## Respondent Details

NAME

Office of the Queensland Mine Rehabilitation Commissioner NA

COUNTRY

Australia

PERMISSION

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

STAKEHOLDER

Government (local / regional / national)

ORGANISATION

Not Specified

## COMMENTS & QUESTIONS BY DOCUMENT

Document:  
Governance

### 1. What is the vision?

COMMENT:

*No comment*

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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

### 1. Introduction

COMMENT:

*No comment*

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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

### General comment on Performance Area

COMMENT:

*OQMRC commend the effort and intent behind the Consolidated Mining Standard. It is a worthwhile initiative and provides a standard around which Facilities across the globe can coalesce their operations.*

*It is encouraging to see foundational principles included in the Consolidated Standard, such as implementation practices, reporting of performance against the standard, public disclosure of relevant information and use of the mitigation hierarchy.*

*Of the Performance Areas we have reviewed, we agree that levels of performance defined as "Good Practice" are generally consistent with industry standards, frameworks, and guidelines in a Queensland context.*

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### Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Good Practice

COMMENT:

*Good Practice -we like the inclusion of a criteria regarding training of workers in accordance with their water-related roles.*

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

COMMENT:

*Leading Practice -it is excellent to see a requirement to minimise the need for long-term active water management. However, we would suggest this should be an expectation of Good Practice.*

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SECTION: 18.2 Collaborative Watershed Management

COMMENT:

*Overall, this is an important aspect which is often overlooked, and it is good that this is included as an area of focus for the standard.*

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### Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy Management at all facilities

COMMENT:

*It is very good to see a requirement to minimise the production of tailings as part of Good Practice.*

*It is excellent to see a requirement to reduce or eliminate tailings and other waste as part of Leading Practice.*

## Performance Area 24: Closure

SECTION: 24.1 Closure Management, Foundational Practice

COMMENT:

*Foundational Practice -we recommend including a requirement similar to Good Practice - Requirement 5 that closure measures are implemented progressively (and also adaptively) during the operating life of the Facility.*

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SECTION: Intent

COMMENT:

*We applaud the intent to plan and design for progressive rehabilitation and closure and to make financial provision to enable implementation of closure and post-closure commitments.*

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SECTION: NA, Good Practice

COMMENT:

*We consider that a company committing to the global mining standard should commit to undertake a reasonable portion of the total progressive rehabilitation prior to on-selling assets to third parties.*

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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: 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

### Disclaimer

COMMENT:

*No comment*

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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