

CMSI Consultation Response

Respondent Details

NAME

Linda Smids

COUNTRY

Finland

PERMISSION

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

STAKEHOLDER

Industry / trade organisation

ORGANISATION

The Finnish Mining Association

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: 4: Exceeds expectations

QUESTION 2

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

Response: yes

Document:
Assurance

3. Who Can Conduct External Assurance?

SECTION: Assurance Provider Requirements

COMMENT:

The possibility to combine assurance processes is important, so this should be made flexible. External auditing is labor and time consuming -according to our experience in Europe. It would be worth considering whether it could be combined with, for example, ISO audits, or whether the process could be streamlined if certifications such as ISO 9001, 45001, 14001, and 50001 are in place.

COMMENT:

The requirements for assurance providers should consider differences for example in licensed degrees and availability of assurance providers in different countries. There is only a limited amount of service providers who fill the criterions and possess the needed language skills and regional understanding.

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:

We appreciate the efforts invested in developing a robust and internationally relevant standard. It is important to ensure that the framework is practical, equitable, and effective in driving responsible practices across diverse contexts.

We commend the standard for retaining a focus on continuous improvement, particularly at the site level. This approach is essential for driving meaningful progress across operations. While the standard provides a comprehensive framework, it may be perceived as overly burdensome for smaller entities.

While the ambition to create a broad and unified international standard is important, we are concerned about potential additional workload stemming from performance areas designed for jurisdictions with weaker enforcement and traceability and accountability mechanisms. To address this, the standard should incorporate exceptions and account for the reliability and competence of detailed national regulation. Additionally, applying a materiality analysis could help prioritize efforts and focus resources on the most significant aspects of ESG -and make the standard more aligned with the CSRD. This would also make it easier for industrial mineral companies to adopt the standard.

It should overall be ensured that the standard sufficiently integrates CSRD and CS3D requirements to avoid duplication of efforts while maintaining comprehensive coverage.

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: 4: Exceeds 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

The level of the requirements is ambiguous, but might not work for smaller companies.

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: 4: Exceeds 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