CMSI Consultation Response

Respondent Details

NAME
Elizaveta Azrapkina

COUNTRY
Russian Federation

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

STAKEHOLDER
Other: ESG Consultancy

ORGANISATION
Horizon Corporate Finance

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

Introduction

COMMENT:

The Board might consider refining the assurance process by incorporating targeted flexibility to address facility-specific challenges, such as geographic, regulatory, and operational contexts, while establishing clear thresholds to balance expectations with capacity. For instance, a phased implementation approach

could allow mines in water-scarce regions to gradually enhance water stewardship practices, and operations in conflict-affected areas to incrementally adopt focused security and human rights assessments. Similarly, facilities in jurisdictions with weak regulatory frameworks could benefit from additional guidance and capacity-building over time, ensuring that enhanced requirements are realistic and attainable without imposing undue burdens.

COMMENT:

An expanded definition of "mitigation hierarchy" along with actionable guidance, including human rights application policies, would be helpful for companies.

Overarching Glossary

COMMENT:

It would be helpful for companies to get more examples of potential stakeholders tailored to industry- or operation-contexts.

Performance Area 1: Corporate Requirements

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Leading Practice

COMMENT:

Please describe the difference between the first point in the Leading Practice and the fourth point in the Good Practice. The Standard covers almost all possible sustainability metrics.

Performance Area 10: Emergency Preparedness and Response

COMMENT:

To increase trust with local communities and ensure their and workers' safety, the Board might consider promoting the use of scalable community engagement strategies tailored to the size of the operation and the proximity of the population. Public updates could be implemented to ensure accountability and transparacy via collaborations on key milestones or joint initiatives between companies and local governments.

Performance Area 11: Security Management

SECTION: 11.1 Security Management

COMMENT:

It would be helpful to expand on the expectations of implementation of VPSHR to ensure companies have clear guidance and communities are content with the accountability mechanisms.

What is the mechanism for assessing security practices' human rights impacts?

Performance Area 12: Stakeholder Engagement

COMMENT:

It would be helpful to emphasize the expectations of stakeholder engagement reporting, e.g. how stakeholder inputs shape decision-making.

Performance Area 13: Community Impacts and Benefits

COMMENT:

For benefit-sharing activities, it is recommended to include monitoring and reporting requirements that focus on outcomes rather than prescriptive processes, ensuring long-term positive effects. These frameworks should remain flexible and be developed collaboratively with community representatives, allowing them to be tailored to local contexts and maintaining accountability and transparency.

Performance Area 14: Indigenous Peoples

COMMENT:

Given recent developments from CBD COP 16, incentivizing the adoption of FPIC through recognition or certification benefits would encourage companies to integrate it voluntarily while avoiding potential delays or complexities in implementation. Additionally, capacity-building support from the standard should be prioritized to help companies effectively navigate FPIC processes and establish best practices over time.

Performance Area 15: Cultural Heritage

SECTION: Glossary and Interpretive Guidance

COMMENT:

Intangible cultural heritage also includes traditional knowledge.

Performance Area 16: Artisanal and Small-Scale Mining

COMMENT:

The board might reconsider the requirements to place greater emphasis on capacity-building for ASM operators, including training on safer practices, to improve outcomes. Additionally, strengthening the monitoring and improvement of environmental practices in ASM operations would support more sustainable and responsible mining activities.

Performance Area 18: Water Stewardship

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

COMMENT:

Please, clarify what the quantity requirments for a facility may be identified in advance (f.e. the amount of water withdrawal, or the percentage of recycled and reused water)?

Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance, Foundational Practice, 1

COMMENT:

The first and second points in the Foundational Practice are very similar, can they replace each other?

SECTION: Applicability

COMMENT:

This Performance Area also should be applicable at the corporate level.

Performance Area 20: Climate Action

SECTION: 20.2 Climate Change Management (Facility Level), Foundational Practice, 2

COMMENT:

It would be useful to explain what is meant by high-level analysis, does it involve Corporate-level procedures?

SECTION: 20.2 Climate Change Management (Facility Level), Leading Practice, 2

COMMENT:

Please specify the difference between point 2 of the Leading practice and point 6 of Good practice. The word collaborate is italicized, but there is no definition in the Glossary.

COMMENT:

The standard does not address the use of renewable energy by companies.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Foundational Practice, 1

COMMENT:

Are there any standards that companies are recommended to use when determining risk materiality?

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions

COMMENT:

Can you please describe how the significance of the impacts of new projects, expansions and other changes is determined?

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

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

3. Types of Reporting & Claims

COMMENT:

We will be glad to look at the template for self-assessment report as soon as possible (p. 6). At the moment, it is not clear how the integration of information from all facilities will work.

COMMENT:

The policy assumes a uniform approach to implementing assurance processes, which might disadvantage smaller facilities. On page 10, the discussion on thresholds could be expanded to include a "progressive claim" model for facilities showing significant improvement but not yet meeting full Good Practice requirements. This would recognize incremental efforts and provide a pathway for facilities to achieve higher levels of compliance over time.

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

1. The first example is more preferable. A. Yes, gradual motivation can help small and medium size businesses to implement the best practices from the standard. B. Such a practice can be implemented a few years after the standard's implementation, after collecting statistics on compliance with its requirements. C. Yes, a higher-level claim can better motivate companies.