

CMSI Consultation Response

Respondent Details

NAME

Isobel Standfast

COUNTRY

Australia

PERMISSION

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

STAKEHOLDER

Affected communities

ORGANISATION

Thiess

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

The governance model is comprehensive and inclusive. It gives all parties appropriate oversight and input. The complexity may result in some inefficiencies.

QUESTION 2

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

Response: yes

Document:
Assurance

2. Roles and Responsibilities

COMMENT:

A facility includes the footprint of all operational activities under the operational control of the company. What are the provisions for Service Providers having partial operational control under contract conditions?

QUESTION 1

From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 4: Exceeds expectations

Similar to TSM, it is a credible process that is both replicable and transparent.

Document:
Standard

Introduction

COMMENT:

Introduction 4)a. states: "It is acceptable to implement a corporate level requirement at the facility level (and vice-versa) as long as the requirement is fully met (and can be verified by an assurance provider)." Thiess' interprets this to mean that all facility level requirements could be applied at the corporate level and assured if sufficient evidence can be provided. This would allow a service provider to gain certification under the standard for it's corporate systems.

Under Introduction 4)c. provision is given for non-applicability of certain performance areas. Thiess understands this to mean that it is possible to reduce the number of required performance areas depending on facility applicability or service provider applicability. An example of this may be for stakeholder / community engagement, where service providers are bound by client systems and client/owner are primarily responsible. For a service provider, this Performance Area would be marked not applicable during the assurance process.

Performance Area 12: Stakeholder Engagement

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Thiess often conducts facility specific stakeholder engagement but this is tracked and managed at a corporate level as we do not have operational control of the facility due to being a service provider.

Will there be any certification pathways specifically designed to recognise corporate-level and facility-level contributions by service providers?

Performance Area 14: Indigenous Peoples

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 15: Cultural Heritage

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 17: Grievance Management

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 2: Business Integrity

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 3: Responsible Supply Chains

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Would the applicability test also be applied to corporate systems the same way it does to a facility?

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: Applicability

COMMENT:

Is this a Performance Area that can be assessed as Not Applicable under the provision in Introduction 4)c. ?

As a Service Provider, this is not an area our business has involvement with or any control over outcomes.

Performance Area 5: Human Rights

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 6: Child Labour and Modern Slavery

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Standards such as ILO Conventions, OECD aligned programs, etc. which are not typically developed or monitored at a facility level. Most often, a corporate function would undertake the implementation of policies and programs that are then applied at a facility level. We suggest that these Performance Areas at a minimum provide the opportunity for mandatory corporate level implementation with optional facility level assurance.

Performance Area 7: Rights of Workers

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

Performance Area 8: Diversity, Equity, and Inclusion

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level)

COMMENT:

Would it be possible to assure this Performance Area Section at the corporate level as per Introduction 4)a.

Performance Area 9: Safe, Healthy and Respectful Workplaces

SECTION: Applicability

COMMENT:

Would it be possible to assure this Performance Area at the corporate level as per Introduction 4)a. ?

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

Clarity around the eligibility criteria for service providers to certify against corporate-level indicators is required.

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

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

Example 1 for Logo Claim being the 80

AQ1. As many companies will have already begun the process of adopting one of the CMSI partner standards, if the equivalency mapping is performed effectively, the transition should not result in too many companies from not achieving a Good Practice or higher.

AQ2. Higher risk performance areas may require specific requirements where applicable.

AQ3. A higher-level claim for companies achieving Leading Practice with a similar threshold to Good Practice may incentivise more companies to strive for a higher level of accreditation.