

CMSI Consultation Response

Respondent Details

NAME

Terry Garde

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Non-governmental organisation (NGO) / civil society organization (CSO)

ORGANISATION

Self Employed

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

1. What is the vision?

COMMENT:

The governing principles behind this initiative are second to none, along with the plans that follow e.g. I was deeply impressed by the desire for equality in representation for Board and Committee members, and in the systems for adopting revisions, changes and implementing these.

I sincerely hope plans for National Panels will be pursued vigorously in countries where mining is predominant and whose economies depend on mineral extraction.

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: **5. Significantly exceeds**

I was not expecting such an inclusive and equitable approach. It is good to see that the perspectives of mining companies are balanced by other interested parties with 'skin in the game'.

QUESTION 2

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

Response: **yes**

While the idea of National Panels is being floated, subject to in-country desires, I believe that States dependent on mineral rich economies should be prioritised. The closer decision making and feed back can reach indigenous peoples and ASM, the better.

Appendices

COMMENT:

The first part listing required qualifications is certainly applicable for large multinational mining corporations often headquartered a world away from their facilities and who need such experts. The second part of equivalent, vouched experience could work where national panels are set up in developing countries where local expertise may not be so highly qualified. Yet at any level, the comprehensive nature of the Standard, especially when dealing with local stakeholders, communities, rights holders, ASM, and so on, requires empathetic listening skills, rather than relying solely on ISO (or other) certified authorities.

QUESTION 1

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

Response: 4: Exceeds expectations

Both the Consolidated Standard and the ideals outlined in the process are comprehensive, requiring a thorough approach to assurance. I wonder if every 3 years may be a little too ambitious and caution for another year or two between external audits as a facility moves along the spectrum between foundational and leading. The life of a mining facility usually far exceeds the span of 3 years and after an initial 6 or 9 years, perhaps the time between regular audits can be extended under normal operating circumstances, as per the recommendation of the assurance provider.

Performance Area 16: Artisanal and Small-Scale Mining

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Foundational Practice, 1

COMMENT:

Level 16.1

Foundational Practice:

additional item 1b. Assist ASM operations to engage with the CRAFT 2.1 Code or similar.

Good Practice:

additional item 3b. Assist ASM operations to fully comply with CRAFT 2.1 Code or similar.

additional item 6: Assist operations with 'Access to Finance Options for ASM' as published by planetGOLD in 2020

Leading Practice:

additional item 4: Assist ASM operations with mine closure and environmental rehabilitation.

COMMENT:

While the practices in this performance area are limited in their scope, the principles behind the intent are laudable. I am very grateful for this initiative.

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

I spent an important part of my mining career developing, writing and auditing standards for use in underground mining. These standards should work at this level of assurance.

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: 4: Exceeds expectations

Yes, most facilities will already have in-house or other international standards to comply with. The transition should be accomplished relatively easily.

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: 5: Significantly exceeds

A single minimum standard is often detrimental to progress, so incremental improvements such as these can be motivational.

Document:
Claims

Disclaimer

COMMENT:

The dual system of reporting outlined in Section 3 is very good. Figure 1 clearly shows the overview of the reporting cycle and how the 2 systems of self-assessment and assured reporting are integrated, well done.

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

This seems to fall into a 'goal - no goal' type of threshold thinking as opposed to a target for aiming at, where there is a greater score closer to the 'bulls eye'. Commonly this is a one to five star ranking system used to score facilities in the hospitality sector. In order not to scare off companies into staying out of the standard until they meet the high bar, as you say, perhaps a graduated rating and reward system could be developed? This rating can then be painted on signage or added to letterheads underneath an accredited logo.