

CMSI Consultation Response

Respondent Details

NAME

Alice Gottesman

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

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

ORGANISATION

LandScale

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:

To meet the goals of the Paris Agreement, coal must be phased out. However, LandScale acknowledges that mining will continue to meet the growing demand for transition minerals and address legacy mining plans, despite its significant impacts on human rights and the environment. To minimize impacts and mitigate risks,

a holistic and participatory approach is essential. This includes ensuring that the rights of Indigenous Peoples and Local Communities (IPLCs) are upheld, with their active involvement in decision-making.

The landscape approach—a management approach focused on multi-stakeholder collaboration to advance shared sustainability goals and build resilience at landscape scale –offers a robust framework for mining governance and sustainability. By fostering multi-stakeholder collaboration, it aligns efforts to achieve shared sustainability goals, addresses risks at the landscape scale, and builds resilience. This method also reduces leakage and prepares stakeholders for diverse scenarios, supporting informed decisions.

ICMM company members have committed to advancing landscape-scale sustainability by 2030 through:

- 1) Restoration, conservation, and regeneration.*
- 2) Collaborative landscape-scale action.*
- 3) Repurposing and regenerating.*

This feedback highlights the absence of the landscape approach in the draft standard, a missed opportunity to embed a proven framework for holistic mining governance. We recommend integrating this approach into the standard to enhance industry-wide sustainability and promote consistent adoption across mining operations.

This input solely reflects LandScale’s perspective on the strategic value of the landscape approach for the mining sector and is not a comprehensive review of the draft Consolidated Mining Standard Initiative.

<https://www.wri.org/insights/how-mining-impacts-forests>

<https://www.landscape.org/wp-content/uploads/2024/05/Core-Criteria-for-Mature-Landscape-Initiatives-2024.pdf>

https://www.researchgate.net/publication/376065188_A_Landscape_Governance_Approach_to_Mining_Landscape_Restoration

<https://www.icmm.com/en-gb/our-principles/position-statements/nature>

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:

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:

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:

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: