

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Spain

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Supplier / business partner

ORGANISATION

Anonymous

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: no

What I see as the main challenge is that evaluation will take place on the full set of topics, which gives room for compensating areas where an operation or company is underperforming. Having independent reports per topics would make this more transparent. This is very much in line with the general complain against ESG ratings, that try to convert a variety of independent topics into a single value, this way losing the relevant details and risk factors

Document:
Assurance

3. Who Can Conduct External Assurance?

COMMENT:

Is this "and" or should this be "and/or"?

QUESTION 1

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

Response: 3: Meets expectations

In general, the proposed assurance process seems quite solid. My main concern is on the selection and required credentials for auditors. Some certification or experience requirements are not relevant to the required expertise, and what will probably happen is that specific areas will be audited by auditors that have no specific understanding in the topic they will audit. As a result, this may convert into a check-box exercise, where auditors are unable to question the value of the data they will be auditing

Document:
Standard

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance

COMMENT:

ICMM, GRI and WAF refer to “change in storage” for water balancing. There is no mention of requirement for disclosure on total water stored (inventory). This is a metric now required for disclosure by CSRD (datapoint ESRS E3-4 28d) and is a direct indicator for: 1. production at risk, 2. environmental risks, 3. geotechnical risks, 4. Potential modifying factor for mineral reserve determination, and as a potential indicator of water-related targets compliance. It is recommended to include the site-level water volume inventory as a mandatory reporting metric.

SECTION: Glossary and Interpretive Guidance

COMMENT:

Reference is made to the concept “fresh water”. Please clarify whether this relates to the source of water (which?), to the quality of water (thresholds?) or both. Note that different standards are not clear on this subject, and most only refer to water as fresh on a water quality basis. This would imply that eg. desalinated seawater should be considered fresh water.

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

The focus on asset-level disclosure is the most relevant aspect in this initiative

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: 2: Below expectations

In general, meets expectations. My main concern relates to companies claiming a higher level of compliance than what they really comply with. How is this going to be audited or secured? It takes only a very few bad examples to devalue the full initiative to being unbelievable. How is the compliance with CMS disclosed going to be reviewed?

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

Not all performance areas have the same level of importance/weight in the final objective of the set standard. There are several performance areas that have a much bigger facility-level impact than others. There are some performance areas that cannot be excluded from facility-level disclosure

Also take in mind that several performance areas are being evaluated externally (financial sector and supply chain), this is where the CMSI has to align