

CMSI Consultation Response

Respondent Details

NAME

Kirsten Margrethe Hovi

COUNTRY

Norway

PERMISSION

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

STAKEHOLDER

Industry (upstream)

ORGANISATION

Norsk Hydro ASA

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:

While we at an overarching level support the approach of the Consolidated Mining Standard, we miss a clearer and more consistent approach to the performance areas and their subtopics being based on materiality. We therefore recommend including materiality analysis as a basis for the complete standard and include it in

the Introduction. Requirements that are not subject to materiality should therefore be specified either in the introduction or otherwise marked in a proper way.

An example of inconsistency is 22.3.2 under “Non-GHG air emissions” which is a requirement subject to a materiality assessment, while 22.7.2 under “Noise, vibrations and light pollution/nuisance” seem to be a requirement independent of materiality. The two requirements are comparable as polluting elements and should both be subject to materiality.

Performance Area 18: Water Stewardship

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 3

COMMENT:

18.2.3: We recommend rephrasing to “Identify relevant watershed-based processes for water resource management including water users, stakeholders, and rights-holders, in accordance with the level of progress of Integrated Water Resource Management (IWRM) or a similar internationally recognized tool.”

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 2

COMMENT:

Key Biodiversity Areas should not be considered alongside the other designations listed in this criterion. KBAs are designated without the need to engage with the responsible authorities in the country and are not explicitly considered under any formal Convention or legal framework, and therefore have no formal governance linked to them. It is therefore incorrect to refer to “restrictions” related to KBAs, or to consider them alongside areas that fall under legally designated protected areas or the Ramsar Convention. If not removed from this criterion, at best, a KBA designation can be used as an indicator of the biodiversity significance of an area and the need to conduct a critical habitat assessment prior to an activity being conducted and adjust the management plan accordingly.

Performance Area 23: Circular Economy

SECTION: 23.2 Additional Requirements for Smelters

COMMENT:

Although requirement 23.2 refers to smelters only, it is unclear to us if this would only apply to smelters with integrated recycling facilities or if it should also apply to standalone recyclers.

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: 4: Exceeds 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