

CMSI Consultation Response

Respondent Details

NAME

Rolf Kuby

COUNTRY

Belgium

PERMISSION

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

STAKEHOLDER

Industry / trade organisation

ORGANISATION

Euromines

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:

Euromines contribution to the discussion on „Consolidated Mining Standard“

As the recognized representative of the European metals and minerals mining industry covering more than 52 different metals and minerals, Euromines shares the ambition to demonstrate and recognize sustainable mining performance.

Euromines members agree that the raw material need of the EU for its transition must not be satisfied by irresponsibly or unsustainably mined minerals and metals. Europe needs a sustainable raw materials base for a sustainable future.

Euromines supports the Paris Agreement and the EU climate target of net-zero emissions by 2050. To reach this goal, sustainable and resilient European value chains are necessary, firmly based on sustainably mined raw materials. To promote a fair and sustainable development Euromines members support the EU principles for sustainable raw materials supply (published 6th September 2021). Euromines agrees with the necessity of recognizing that the green and sustainability transition must not be built upon unsustainable practices.

Raw materials extracted in Europe adhere to a very high regulatory framework and provide a significant contribution to sustainability and security of supply for Europe. The consolidation of the different existing certifications and standards should streamline and reduce different reporting and information requirements that are imposed on mining operators to monitor, assess, and report several times the same data to different bodies or labelling mechanisms.

To that end, the Consolidated Standard is an opportunity to support a level playing field for the European mining industry's competitiveness by establishing a common understanding of the sustainability requirements of raw materials -and with it an integration of ESG-compliance costs in the final price.

It should be noted that the value of and the need for a certification can be perceived differently. In countries where there is a general trust in legislation and enforcement a third-party certification paid by the company concerned might be of less value than in jurisdictions with weak enforcement and traceability and accountability mechanisms. Thus, while we recognize the positive effects of such Consolidated Mining Standard, it must not trump the EU and EU Member States' national regulatory competence.

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: