

CMSI Consultation Response

Respondent Details

NAME

FERNANDO ALARCON

COUNTRY

Peru

PERMISSION

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

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

AFS ENGINEERING & CONSULTING

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: 4: Exceeds expectations

La gobernanza supera las expectativas

Governance exceeds the expectations

QUESTION 2

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

Response: unsure

Algunos ítems son muy generales

Some items are too general

Document:
Assurance

QUESTION 1

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

Response: 4: Exceeds expectations

El proceso de aseguramiento es sólido

The Assurance Process is solid

Document:
Standard

Introduction

COMMENT:

Uno de los temas fundamentales es verificar el cumplimiento de los estándares para evitar la subjetividad

TRANSLATION:

One of the main issues is to check standards compliance to avoid subjectivity

Performance Area 1: Corporate Requirements

SECTION: 1.2 Sustainability Reporting, Good Practice

COMMENT:

Difundir los reportes de sostenibilidad en forma sencilla a la comunidad y con los temas más relevantes

TRANSLATION:

Spread the sustainability reports in the community in a simple way, together with the more relevant topics

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Identify and Address Community Impacts, Foundational Practice

COMMENT:

Los ítems incluidos como buena práctica y como práctica líder deben ser prácticas básicas, son obligaciones de las empresas mitigar los impactos con participación de la comunidad y las autoridades

TRANSLATION:

The items included as Best Practice and Leading Practice should be considered basic practice; the companies are obliged to mitigate the impact with the participation of the community and the authorities

SECTION: Intent

COMMENT:

Agregar en objetivo: Maximizar los beneficios a la comunidad a través de: empleo, contrato a empresas locales, provisión de servicios, entre otros

TRANSLATION:

Add in the objective: Maximize the benefits to the community through: employment, contracts with local companies, provision of services, among others

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Foundational Practice

COMMENT:

Incluir como práctica básica: "que las operaciones deben contar con la gobernanza del agua y el responsable de la Gestión del agua es el Gerente General"

TRANSLATION:

Include as basic practice: "that operations must have water governance and that the person responsible for water management is the General Manager"

COMMENT:

Sugiero colocar un ítem específico para el manejo de agua ácida, en muchas operaciones se presenta

TRANSLATION:

I suggest to put a specific item for acidic water management; it is present in many operations

SECTION: 18.1 Water Management and Performance, Good Practice, 10

COMMENT:

Agregar en el ítem 10: "elaborar programas de concientización sobre el uso y cuidado del agua"

TRANSLATION:

Add to item 10: "develop awareness programs on water usage and care"

SECTION: 18.1 Water Management and Performance, Good Practice

COMMENT:

Especificar que el balance operativo debe incluir calidad y cantidad de agua

TRANSLATION:

Specify that the operational balance should include water quality and quantity

SECTION: 18.1 Water Management and Performance, Leading Practice

COMMENT:

Se sugiere agregar la aplicación de Economía Circular en la Gestión del Agua

TRANSLATION:

It is recommended to implement circular economy in water management

COMMENT:

Sugiero agregar:

- En la medida de lo posible implementar estructuras de almacenamiento de agua en época de lluvia y utilizarla en época seca

- Implementar indicadores de desempeño en la Gestión de calidad y cantidad de agua

TRANSLATION:

I suggest to add: - When possible, implement water storage structures in the rainy season and use that water in the dry season - Implement performance indicators in water quality and quantity management

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice

COMMENT:

Sugiero cambiar el subtítulo de “Gestión Colaborativa de Cuencas Hidrográficas” por Gestión de Cuencas Hidrográficas en el área de influencia (ojo esta área de influencia hídrica es diferente al área de influencia de impactos”

TRANSLATION:

I suggest to change the subtitle: “Collaborative Management of Watersheds” for Watershed Management in the Area of Influence (mind that the hydrological area of influence is different from the area of influence of impacts)

COMMENT:

Sugiero incluir en práctica básica:

- Identificación de los usos y costumbres del Agua en las comunidades.*
- Conocer las características de la cuenca donde desarrolla sus actividades, como por ejemplo: uso del agua (agricultura, ganadería, turismo, industrial, para tratamiento y abastecimiento de agua potable, forestal, reserva, vida acuática, zona de recarga, mineralización, inventarios de fuentes de agua de las comunidades, entre otros*

TRANSLATION:

I suggest to include in basic practice: - Identification of uses and customs around water in the communities. - Learn the characteristics of the basin where it performs its activities, such as: water use (agriculture, stock-breeding, tourism, industrial, treatment and supply of drinking water, forestry, reserve, aquatic life, recharge zone, mineralization, water source inventories in the communities, among others

SECTION: 18.3 Water Reporting, Good Practice

COMMENT:

Sugiero agregar como buena práctica:

- Divulgar resultados de calidad y cantidad de agua*
- Divulgar La Gestión del Agua y la gobernanza y sus riesgos*
- Realizar monitoreos participativos: empresa, autoridad, comunidad y universidades (si aplica).*
- Todos los permisos que tiene la empresa minera sobre licencias de uso de agua superficial y subterránea y autorización de vertidos*

TRANSLATION:

I suggest to add as Best Practice: - Disclose water quality and quantity results - Disclose water management and water governance and their risks - Carry out participative monitoring: company, authority, community and universities (if applicable). - All the permits that the mining company has about use licenses of surface and ground water and discharge authorization

SECTION: Glossary and Interpretive Guidance

COMMENT:

En la definición de: "Agua Sin Contacto: agua que no ha entrado en contacto con la huella de la Instalación. Esta agua a

menudo se captura y se desvía alrededor de la Instalación para evitar que se convierta en agua de contacto", sugiero reemplazar "a menudo" por "se debe derivar fuera de la huella de la operación".

TRANSLATION:

In the definition of: "non-contact water: water that has not been in contact with the facility footprint. This water is often taken and diverted around the facility to prevent it from becoming contact water". I suggest to replace "often" by "it should be diverted out of the operation footprint".

COMMENT:

Sugiero agregar la definiciones de tipos de gua por su uso:

- Agua fresca, proveniente de fuentes subterráneas o superficiales*
- Agua tratada, agua que pasado por proceso físico o químico para su posterior vertido.*
- Dilución, uso de agua fresca para cumplir con los Límites Máximos Permisibles. Este no está permitido*

TRANSLATION:

I suggest to add the definitions of water types by their use: - Fresh water: coming from underground or surface sources - Treated water: water that has been through a physical or chemical process to be later discharged. - Dilution: the use of fresh water to meet the permissible maximum limits. This is not allowed

COMMENT:

En la definición de Balance hídrico de una Instalación se indica que "es el volumen de extracción =volumen de descarga + volumen de consumo + cualquier cambio en el volumen de almacenamiento de agua dentro de los límites de la Instalación". Sugiero retirarlo porque se tiene muchas variables de entradas y salidas que es difícil tener suma cero, que puede generar controversias y dudas. Lo que sugiero es que se indique utilizar modelos aceptados y calibrados para elaborar el balance de agua

TRANSLATION:

In the definition of the water balance of a facility it says that: "it is the extraction volume = discharge volume + usage volume + any change in the volume of water storage within the boundaries of the facility". I suggest to take it out, as there are many input and output variables that make it very difficult to get to zero, and they might raise concerns and doubts. I suggest to use accepted and calibrated models to develop the water balance

SECTION: NA

COMMENT:

Sugiero agregar como práctica básica:

- El objetivo de cumplimiento del 100% en las descargas de agua tratada hacia los cuerpos de agua (Límites Máximos Permisibles y Estándares de Calidad Ambiental).*
- Monitoreo de la vida acuática en los cuerpos de agua con influencia de la operación minera*
- Monitoreo de calidad y cantidad de agua en línea (tiempo real)*

TRANSLATION:

I suggest to add as basic practice: - The objective of 100% compliance when releasing treated water into bodies of water (permissible maximum limits and environmental quality standards). - The monitoring of aquatic life in the bodies of water influenced by mining operations - The monitoring of water quality and quantity on line (in real time)

SECTION: NA

COMMENT:

Debemos ser más exigentes en la Gestión del Agua. es decir, las buenas practicas señaladas deben ser consideradas como prácticas básicas

TRANSLATION:

We should be stricter regarding Water Management; meaning, that the indicated Best Practices must be considered basic practices.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

Sugiero incluir que el Plan de Gestión de Biodiversidad debe incluir como mínimo: identificación de especies de flora y fauna, manejo de las especies (rescate y reubicación), protección de las especies amenazadas

TRANSLATION:

I suggest to include that the Plan of Biodiversity Management must contain at least: identification of flora and fauna species, species management (rescue and relocation), protection of endangered species

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 6

COMMENT:

Sugiero indicar que los reportes NFD, GRI, CSRD o ISSB sean presentados a los stakeholders de forma sencilla. Actualmente son muy amplios y la comunidad no lo entiende

TRANSLATION:

I suggest to point out that the NFD, GRI, CSRD or ISSB reports are shown to the stakeholders in a simple way. Nowadays, they are too large and the community does not understand them

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice

COMMENT:

Sugiero incluir que el Plan de Biodiversidad debe tener la opinión de una institución reconocida de investigación o universidad especializada

TRANSLATION:

I suggest to include that the Biodiversity Plan must have the opinion of a renowned research institution or a specialized university

Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance

COMMENT:

Revisar las opciones porque el Cumplimiento Legal sólo tiene dos opciones, Cumple o No Cumple. En ese sentido, sólo se tendrían prácticas básicas

TRANSLATION:

Revise the options, as Legal Compliance has only two options, either to comply or not. In that sense, there would only be basic practices

Performance Area 20: Climate Action

SECTION: Glossary and Interpretive Guidance

COMMENT:

revisar el 1.5 grados de meta, este ya o es real no lo alcanzaremos

TRANSLATION:

Review the goal of 1.5 degrees; it is no longer real and we will not reach it

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Good Practice, 4

COMMENT:

La difusión del grado de cumplimiento debe enfocarse en los temas críticos de la Gestión de Relaves. En varios reportes públicos de las empresas sólo se menciona por ejemplo 85% de cumplimiento del GISTM y no conoce si el 15% restante son temas críticos o significativos

TRANSLATION:

Dissemination of the compliance level must be focused on critical topics of Tailings Management. In several public reports from the companies, for example, only an 85% compliance with the GISTM is mentioned and it is not known if the remaining 15% are critical or significant topics

SECTION: 21.1 Tailings Management, Leading Practice

COMMENT:

Agregar un nuevo ítem relacionado con la evaluación si se puede reprocessar el relave para obtener otros minerales críticos o tierras raras.

TRANSLATION:

Add a new item related to the assessment if it is possible to reprocess the tailing to obtain other critical minerals or rare-earth elements.

SECTION: Applicability

COMMENT:

Ciertos criterios de la Gestión de Relaves deben extenderse a depósitos de material de desmonte (es decir el que no tiene valor económico para ser procesado y que puede producir agua ácida con contenido metálico.

TRANSLATION:

Certain criteria for Tailings Management should be extended to waste rock deposits (i.e. that which has no economic value to be processed and can produce acidic water containing metals).

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management

COMMENT:

Incluir:

- La aplicación de Economía Circular

- Incluir el manejo de los plásticos

TRANSLATION:

Include: - Implementing circular economy - Include plastic management

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management

COMMENT:

Los ítems colocados (1 al 4) como buena práctica deberían ser como práctica básica.

TRANSLATION:

The items listed (1 to 4) as Best Practice should be considered basic practice.

SECTION: 22.4 Mercury, Leading Practice, 1

COMMENT:

Sugiero reemplazar la palabra "eliminar" por "realizar una disposición final responsable"

TRANSLATION:

I suggest to replace the word "eliminate" for "carry out a responsible final disposal"

SECTION: 22.5 Cyanide, Foundational Practice, 2

COMMENT:

en el ítem 2 se puede interpretar como juez y parte, la autoevaluación o revisión debería realizarse por auditores reconocidos por el Instituto del Código del Cianuro

TRANSLATION:

Item 2 can be interpreted as being judge and jury; self-assessment or revision should be carried out by auditors endorsed by the Cyanide Management Institute

SECTION: 22.5 Cyanide, Leading Practice

COMMENT:

Se podría agregar como otra práctica líder "investigar sobre otras opciones para reemplazar el uso de Cianuro, como la Glicina"

TRANSLATION:

Another thing might be added as leading practice: "investigate other options to replace the use of cyanide, such as glycine".

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 1

COMMENT:

El ítem 1 debería ser parte de práctica básica y no de buena práctica

TRANSLATION:

Item 1 should be considered basic practice, not Best Practice

SECTION: 22.6 Accidental Polluting Releases, Good Practice

COMMENT:

Incluir la evaluación de reemplazar el uso de Anfo en voladura para minimizar la generación de Nitritos y Nitratos que luego están presentes en la calidad de agua

TRANSLATION:

Include the assessment of replacing the use of ANFO for blasting to minimize the generation of nitrites and nitrates which are then found in water quality

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Leading Practice

COMMENT:

Realizar evaluaciones para la posibilidad de convertir un cierre de mina en activo, como por ejemplo reprocesamiento para obtener minerales críticos

TRANSLATION:

Carry out assessments regarding the possibility of turning a mine closure into an active mine, such as reprocessing in order to obtain critical minerals

Performance Area 3: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Good Practice

COMMENT:

Agregar que la empresa minera debe difundir con la comunidad sus proyecciones de contratación de equipos, personal, servicios, entre otros

TRANSLATION:

Add that the mining company should share with the community its projections about team recruitment, personnel, services, among others

Performance Area 4: New Projects, Expansions and Resettlement

COMMENT:

Sugiero agregar para proyectos nuevos que el reporte técnico de reservas NI 43-101 debe incluir los temas de Agua, Biodiversidad

TRANSLATION:

For new projects, I suggest to add that the NI 43-101 technical report on reserves must include the topics: water, biodiversity

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

En su mayoría supera las expectativas

It mostly exceeds the 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

Algunos temas son muy generales para la evaluación de cumplimiento

Some topics are too general for compliance assessment

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: 3: Meets expectations

Se debe revisar varios ítems porque muchos requerimientos son los mínimos exigidos

Several items must be revised, as many requirements are minimum requirements

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 \begin{quote}En referencia a la medición sugiero referirse a la significancia de determinados temas que son más críticos que otros, como el manejo de reales que debe tener mayor peso y no sólo un porcentaje del total. Por ejemplo se puede decir que cumple con 80% y quizás dentro del 20% restantes se encuentran temas significativos como Gestión de Relaves, Seguridad, Cumplimiento Legal, entre otros\end{quote}

About measuring, I suggest to refer to the importance of certain topics that are more critical than others, such as tailings management, that should carry a larger weight and not just a percentage of the total. For example, it can be said that it complies with 80%, but maybe within the remaining 20% there are significant topics, such as Tailings Management, Safety, Legal Compliance, among others