

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Assurance provider/auditor

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: 3: Meets expectations

QUESTION 2

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

Response: yes

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

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management

COMMENT:

although it is implied that these are applicable to all tailings facilities, #2 specifies for any non-conventional, and none of the preceding subsections indicate for any and all types of tailings facilities.

Somewhere it should mention that conformance shall be pursued, internally reviewed and audited, etc. for all tailings facilities, whether conventional, thickened, paste, filtered, or other.

SECTION: Applicability

COMMENT:

produces only? should this not include "reprocesses, rehandles, stores, and manages"? what about closed sites/facilities that have been purchased by companies but the tailings are pre-existing and were not produced by them?

Performance Area 22: Pollution Prevention

SECTION: 22.6 Accidental Polluting Releases, Foundational Practice

COMMENT:

Measures can be taken to not only prevent or reduce the potential for releases, but also to reduce the potential impacts of release, if it should occur. Proactive planning is critical and this should be included in the fundamental practices.

Performance Area 23: Circular Economy

COMMENT:

I would encourage the expansion of circularity thinking to not only include materials (sourced and produced) and equipment, but also infrastructure, including housing and buildings, energy, water treatment, and other similar value-add systems for the region, and disturbed lands, which can all be repurposed at the end of mine life (or better yet, designed for post-mining land use).

Many resources outside of the ICMM purview: https://circulareconomyleaders.ca/our-resources/?category_filter=publication&minerals-metals&search_query=

<https://bit.ly/33yrlUQ>

<https://theintelligentminer.com/2022/01/19/circular-mining-as-without-so-within/>

Performance Area 24: Closure

COMMENT:

Should consider including the "transition" terminology as part of this section, since a lot of closure-planning resources, particularly related to social elements, refer to transition rather than closure outright. Part of mine closure is transition planning for any post-mining use of land, infrastructure, resources, etc, as well as the related social elements.

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: **3: Meets 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: 3: Meets expectations

There should still be a level to indicate where foundational performance is not yet achieved.

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

Could there be different logo claims? 1. for those at early stages, indicating their commitment to adopting, paired with a report indicating the areas they meet foundational and good, and where they need work to get there? 2. the 75/753. the 904. 100

other q's 1. I like the idea of a gradual ramp-up with different logos as suggested. It would also help to identify where companies just need more support generally. 2. yes, there should be specific requirements that are mandatory, in various performance areas. human rights, safe work, risk identification, for example. 3. yes, as suggested above for different logos at various stages.