

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

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: 4: Exceeds expectations

QUESTION 2

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

Response: yes

Document:
Assurance

4. Consolidated Standard External Assurance Process

SECTION: General

COMMENT:

The timelines are clear and reasonable to ensure continuous improvement.

QUESTION 1

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

Response: 5: Significantly exceeds

Excellent and clear assurance process referencing ISO 19011. The requirements and expectations set the path for continuous improvement.

Introduction

COMMENT:

The introduction provides a clear framework which scopes and groups the 24 Performance areas under the 4 Pillars.

The intent of the common structure is useful and clear. Recommendation: Change the bullet points to Roman numerals to allow a sequenced reference to the common structure.

COMMENT:

2) Levels of Performance

Observations: There are 3 level of performance (1,2,3)

Questions:

1. What is the timeline related to "eventually achieve"?

2. If foundational Practice is the minimum requirement it must be assumed that all stakeholders who are subject to the consolidated standard start here. How long is it expected that a performance area remains at foundational?

3. Based on the number of Performance areas and the levels of performance the minimum quantified score is 24, the mean is 48 and the maximum is 72.

What is the expectation, that stakeholders start at foundational and remain there for 5 years maintaining a score of 24?

How will the philosophy of continuous improvement be demonstrated?

COMMENT:

4) Implementation of the Consolidated Standard

Observation:

A distinction has been made between facility and corporate level implementation requirements.

Performance Area 1: Corporate Requirements

COMMENT:

Recommendation:

The numbering format within the levels for the specific Performance areas should be reflective of the number of requirements.

(i.e. Level 1.1 has a total of 7 specific requirements. If they are numbered from 1 to 7 it will be very easy to specify numerically exactly where the facility is based on qualitative and quantitative level ratings.)

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: 4: Exceeds 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: 5: Significantly exceeds

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

Example 2 is reasonable to provide flexibility in adopting as well as provides flexibility on the path to meet continuous improvement.

1. No a more gradual on ramp is not appropriate. If facilities cannot meet the 75
2. The threshold levels are in accordance and aligned to legal requirements. GISTM and tailings must be rated as a minimum as good. Based on the existence of GISTM how can we expect otherwise. If the bar is set low it negates the intent of GISTM and may go against legal and regulatory requirements.
3. There should be no incentives of meeting any requirement. Incentives drive behaviors that are non conducive to continuous improvement. We are in 2024, we must start making progress for it's own sake of continuous improvement.