

CMSI Consultation Response

Respondent Details

NAME

Estelle Levin-Nally

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Other: Sustainable Minerals Consultancy

ORGANISATION

Levin Sources

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

1. What is the vision?

COMMENT:

Please see my comments i the document I uploaded.

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

1. Introduction

SECTION: General

COMMENT:

i did not have time to review this.

QUESTION 1

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

Response: No Response

i didnt' have time to review.

Document:
Standard

Introduction

COMMENT:

Please see my comments in the document i uploaded.

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: 2: Below expectations

• This is not aligned with the UNGPs or OECD Guidelines for MNEs in a holistic fashion, which is a major gap and missed opportunity to do something even more rationalised and effective (But also to support whole value chain conformance to EU' s CSDDD and Batteries Regulations. I present ideas on this in my commentary below. Fundamentally, as the standard is not risk-based overall, it' s not adequately resource-/ impact-sensitive. This could be radically revised to make it more implementable and more impactful. I strongly suggest you need an expert in these frameworks to overhaul the standard. i have some key points I'll share in a document by email.

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: 2: Below expectations

I think greater specificity is needed in some places.

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: 2: Below expectations

I really like the 3 level performance structure, but greater guidance is needed on when it's good enough to be foundational plus good plus leading in different areas. The level achieved should be risk-based. For example, where indigenous peoples rights are irrelevant (e.g. the mine is in the UK) then this performance area shouldn't apply. Where the child labour risk is low based on the UNICEF child rights atlas, then a company shouldn't need to meet leading practice expectations.

Disclaimer

COMMENT:

i did not have time to review this.

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

i didnt' have time to review.