

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Chile

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Non-governmental organisation (NGO) / civil society organization (CSO)

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

I'd like to see NGO's representation. Thinking specifically on those who do not like mining

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 18: Water Stewardship

COMMENT:

I think this area is missing information related to seawater consumption

Performance Area 20: Climate Action

SECTION: 20.3 Annual Climate Change Public Reporting, Foundational Practice, 1

COMMENT:

I think reporting energy consumption at the facility level is foundational

Performance Area 9: Safe, Healthy and Respectful Workplaces

SECTION: 9.3 Training, Behaviour and Culture, Leading Practice, 1

COMMENT:

I suggest giving an example of this. It might be difficult to see or measure.

SECTION: 9.3 Training, Behaviour and Culture, Leading Practice, 2

COMMENT:

I suggest giving an example of this. It might be difficult to see or measure.

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: 4: Exceeds expectations

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

I like both examples, but i think that condition number 2 of example 2 could be difficult to achieve for those smaller companies.

I suggest 2 or 3 levels based on the proposed levels per area:

(1) 75- Facilities must achieve the Leading Practice level of performance in 75- Good Practice in the remaining applicable Performance Areas.

(2) 75- Facilities must achieve the Good Practice level of performance in 75- Foundational Practice in the remaining applicable Performance Areas.

(3) FOUNDATIONAL PERFORMANCE - I'm not sure about this one (sorry). Something that small mining companies can obtain but it is not too low for big companies.

Overall, I believe that the process of obtaining the certificate should not be so discretionary. It could be inspired by the Nicholas methodology for selecting the exploitation method. For example, when evaluating a copper mine, tailings management should be at least at the "Good Practice" level; otherwise, it should be evaluated with a negative score. Additionally, the different levels and areas proposed could have varying weights, depending on the primary product of the facility.