

CMSI Consultation Response

Respondent Details

NAME

Teresa Steele-Schober

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Supplier / business partner

ORGANISATION

SRK Consulting (UK)

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

1. What is the vision?

COMMENT:

The vision notes that confidence must be provided to consumers however investors also surely want confidence that their investments are supporting responsible production of metals and minerals. Governments also seek confidence that the mineral resources which they are custodians of on behalf of their nations are also being responsibly developed.

5. What does the overall governance model look like?

COMMENT:

I would assume that there are some forms of conflict resolution built into the terms of reference of the Board to cater for instances where consensus becomes impossible.

7. How will the Board make decisions?

COMMENT:

Based on the voting procedure outlined, would a resolution which achieves the required 70% approval but not the positive affirmation threshold be valid? Mathematically it is possible for 70% to be achieved without the positive affirmation. The double threshold requirement should be made clear if that is the case.

8. What will the composition of the Mining and Value Chain Committees look like?

COMMENT:

Are sustainability reporting / disclosure entities considered to be 'other interest' groups - for example GRI? In addition, other bodies involved in mineral resource governance may be valuable to include - such as CRIRSCO.

COMMENT:

Clear boundaries should be established to ensure that all decisions at committee level are thoroughly reviewed by the Board. There may be merit in establishing thresholds but it is essential that significant decisions are clearly reviewed by the Board without exception.

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: unsure

Document:
Assurance

2. Roles and Responsibilities

COMMENT:

Please confirm if facilities that are geographically separate from a mine can be included e.g. a smelter located >100km away that is used by a number of different mines to process their products.

COMMENT:

Will the assurance provider training be open to individuals or organisations who would prefer to support facilities to become compliant with the CMSI but not actually be the assurance provider themselves? Some consultancies may be better suited to providing on the ground support rather than assurance and all parties could benefit from the training being made broadly available. This would also facilitate increased transparency of the training programme - perhaps even extending to mining stakeholders who may be interested in understanding the process better.

COMMENT:

It may be useful to specify that facilities should provide correct contact details for their stakeholders as well as any information on protocols in place governing when / where / how stakeholders are contacted.

3. Who Can Conduct External Assurance?

SECTION: Who Can Conduct External Assurance?

COMMENT:

See earlier comments - there would be much merit in the training being made available to a broad range of parties, not only those wishing to undertake assurance.

COMMENT:

Would a facility be entitled to constitute their own team of assurance providers based on a mix of individuals who are employed by different companies or would the onus be on the registered assurance providers to advertise themselves as a team?

QUESTION 1

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

Response: 3: Meets expectations

See comments in the document. The difference between individuals registering to become Assurance Providers in their individual capacity but then companies also being able to register seems conflicting based on the note that APs are accredited as individuals. Is the expectation that a company can only submit applications for accredited individuals on their behalf and including all relevant personal information and then that the accreditation lies specifically only to the named individuals and not the company? These requirements could be more clearly explained.

Document:
Standard

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: No Response

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: No Response

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: No Response

Details not reviewed due to time constraints.

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