

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

Germany

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

ORGANISATION

Anonymous

## COMMENTS & QUESTIONS BY DOCUMENT

Document:  
Governance

### 12. How would the Board be renewed over time?

COMMENT:

*Specific interval to be implemented , e.g. 2, 3 years for board seat renewal*

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: 2: Below expectations

QUESTION 2

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

Response: unsure

Document:  
Assurance

### 4. Consolidated Standard External Assurance Process

COMMENT:

*Minimum time for advanced notification should be 60 days*

QUESTION 1

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

Response: 2: Below expectations

Document:  
Standard

### **Performance Area 16: Artisanal and Small-Scale Mining**

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Good Practice

COMMENT:

*All requirements mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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### **Performance Area 17: Grievance Management**

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders

COMMENT:

*Requirements 1. and 2. mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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### **Performance Area 18: Water Stewardship**

SECTION: 18.1 Water Management and Performance, Good Practice

COMMENT:

*Requirements 4, 6, 8, and 9 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 18.3 Water Reporting, Good Practice

COMMENT:

*First required mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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### **Performance Area 19: Biodiversity, Ecosystem Services and Nature**

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice

COMMENT:

*Requirements 1-3 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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## **Performance Area 20: Climate Action**

SECTION: 20.2 Climate Change Management (Facility Level), Good Practice

COMMENT:

*Requirements 1-5 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 20.2 Climate Change Management (Facility Level)

COMMENT:

*All requirements mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 20.3 Annual Climate Change Public Reporting, Good Practice

COMMENT:

*All requirements mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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## **Performance Area 21: Tailings Management**

SECTION: 21.1 Tailings Management, Good Practice, 1

COMMENT:

*Requirements 1-3 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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## **Performance Area 22: Pollution Prevention**

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management

COMMENT:

*All requirements mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 22.2 Mineral Wastes, Good Practice

COMMENT:

*All requirements mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

*Requirements 1-3 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 22.4 Mercury, Good Practice

COMMENT:

*First requirement mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 22.5 Cyanide, Good Practice, 1

COMMENT:

*Requirement mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 22.6 Accidental Polluting Releases, Good Practice

COMMENT:

*Requirements 1 and 3 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Good Practice

COMMENT:

*Requirements 1-2 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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## **Performance Area 23: Circular Economy**

SECTION: 23.1 Circular Economy Management at all facilities, Good Practice

COMMENT:

*Requirements 1-2 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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## **Performance Area 24: Closure**

SECTION: 24.1 Closure Management, Good Practice

COMMENT:

*Requirements 1-3 mentioned in good practice should at least be part of foundational practice, otherwise are requirements too weak.*

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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: 1: Significantly below

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: 1: Significantly below

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: 1: Significantly below

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