

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Switzerland

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Trader

ORGANISATION

Anonymous

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

6. What will the composition of the Board look like?

COMMENT:

Important that major mining representatives - currently excluded from the "western" narrative on responsible minerals practices are included in governance. They need to feel ownership, and they are crucial in ensuring ALL producers are reached in terms of what is seen as global market practice of responsible minerals supply chains. If they are not included, there is a very high risk that this standard is just becoming a separate standard, the eastern companies don't have to care about - not actually improving any conditions for people on the ground.

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: 5: Significantly exceeds

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

SECTION: NA

COMMENT:

Add a step 6 - Long term corrective actions for companies only targeting foundational level, and must become good practice first after 2 years.

COMMENT:

There must be a possibility for sites to reach only foundational level and be able to make a claim about this.

COMMENT:

In our view, there must be at least 2 years for a site to be able to reach Good practice level - if not, the value of foundational level, making it inclusive to medium-sized companies in certain jurisdiction will be lost.

I.e there must be two different kinds of Continual improvement plans - a company that committed to reach "Good practice" follow the normal route described herein. A company committed to foundational level, only needs to reach foundational level on all performance areas. Within 2 years they need to fulfill all criteria for Good Practice level.

QUESTION 1

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

Response: **2: Below expectations**

The assurance process must allow for companies with a lower degree of maturity to become foundational level and have longer time until Good Practice Level. Otherwise the value of Foundational level is not captured, and the standard lose its "inclusivity".

Document:
Standard

Introduction

COMMENT:

First I would like to acknowledge that the standards is very good. Our comments on the standards and this documents is almost only targeted on the foundational level, which we believe is a very good feature of the standard. Our biggest fear with standards is the separate market that is created for "less mature" producers - equally important for the supply of mineral for the clean energy transition, but forgotten. The foundational level will be key in attracting those producers in committing to responsible mining standards. The level for the foundational level in this standard, is also deemed generally very good.

Performance Area 11: Security Management

SECTION: Glossary and Interpretive Guidance

COMMENT:

Security Risk assessment : "...in a way that respect human rights and humanitarian law". This needs to be further clarified. What does "in a way that respects.." mean in practice?

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Foundational Practice, 3

COMMENT:

The expectation is unclear, what does a “climate-related corporate risk and opportunities assessment” include? Since physical risks is covered in 20.2, does this cover transitional risks? Climate-related risks are defined below, but what is climate related opportunities?

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Foundational Practice, 1

COMMENT:

1. Committing to GISTM will be way beyond what most small-medium sized miners are ready to do, could we find a foundational level of GISTM? Such as the establishment of certain roles and responsibilities, and oversight from independent review .

2. It goes too far in prohibiting riverine tailings, that is the easy way out. Look at technical details of riverine tailings at the Nussir copper project in Norway. The guidance should rather seek to prevent the adverse impacts it want to avoid with riverine tailings, such as leaching of hazardous chemicals.

Performance Area 22: Pollution Prevention

SECTION: 22.4 Mercury, Foundational Practice, 2

COMMENT:

Consider using a more simplified language to be more inclusive, most of the small-medium sized miners are lost at the use of “material stewardship”

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy Management at all facilities, Foundational Practice, 1

COMMENT:

Simplify language to be more inclusive: “Publicly commit to increased resource efficiency, reprocessing, reuse, recovery and recycling in the Facility’s operations ”

Performance Area 4: New Projects, Expansions and Resettlement

SECTION: 4.2 Land Acquisition and Resettlement, Foundational Practice, 3

COMMENT:

Socio-economic baseline study not defined

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: 3: Meets expectations

It's very good - but the foundational level could possibly have a somewhat lower level.

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: 3: Meets expectations

To ensure inclusion, that all producers understand the requirements, there may be sections that needs the use of a language that is more accessible.

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

This is critical, we need to have a lower level for small-medium sized producers - with limited resources to enable them to enter "responsible minerals markets", otherwise we risk losing them resulting in neglecting the people impacted by those operations. And these operations are as critical to meet demand for metals needed for the clean energy transition. There must be a standard that HELPS people in all mineral supply chain have their fundamental rights.

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

Important to make it simple but still inclusive:

+Avoid claim on specific performance areas - i.e. leading practice in X,Y or Z - if you are leader you need to be a leader all way through.

+To incentivize the small and medium sized producers, there must a possibility for those only reaching foundational level to make a claim, whether it being CMSI Foundational level or CMSI committed is less important.