

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

United States

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (midstream/downstream)

ORGANISATION

Anonymous

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

1. What is the vision?

COMMENT:

The Consolidated Mining Standard should yield tangible benefits and make it easier for customers, investors, companies, employees, and communities of interest to better evaluate mining projects that seek to participate. The heavy emphasis on community consultation, dispute resolution between the CMSI governance and participants, and an apples-to-apples comparison between mines in different countries should result in a net positive for mining industry participants seeking to make constructive reforms and engage with outside stakeholders in mining communities.

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: yes

Document:
Assurance

1. Introduction

COMMENT:

1) Potential Lack of Assurance Providers

There is concern that the pool of qualified assurance providers will not be large enough to support demand for achieving third-party assurance within the timeframe presented by the CMSI. We suggest that CMSI work to have a substantial pool of accredited assurers ready to start work when the framework is finalized and ready for implementation. Having local assurers allows for not only quicker and less costly evaluations, but also facilitates the development of well-trained assurers that understand regional regulatory regimes, local practices and hurdles, thus adding credibility to the process.

2) Expected Number of Assurance Days

It is unclear how CMSI will determine the scope of assurance at any given facility. CMSI references several audit standards (e.g., ISO 19011) that will be used as guidance to establish a risk-based scope of third-party assurance activities. Given assurance is not as detailed as an audit, using these standards may result in over-scoping assurance activities. It is also unclear how a facility risk will be evaluated to determine scope. Having several assurance providers on site for days or weeks is disruptive and costly, and some companies may not see the value in pursuing third-party assurance unless there are appropriate guardrails around scope.

COMMENT:

Qualified CMSI Consultants

CMSI should also ensure that it has either in-house facilitators or easily accessible third-party consultants in a variety of markets that can work with mining companies to undertake GAP assessments to eventually become CMSI compliant. It would be helpful for CMSI to develop a set of tools to support companies undergoing implementation -in the form of lists of consultants to help with GAP assessments and a database of commonly asked questions and answers -and facilitate conversations between companies to share their experiences and best practices for implementation with each other.

QUESTION 1

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

Response: **3: Meets expectations**

We have some questions and concerns that are noted in our comments, but we think this is a good draft that starts from a position of strength in it's internal mechanisms, but we would like to see a wide range of credited assurers ready for implementation when the final standard is ready for implementation by companies.

Document:
Standard

Performance Area 20: Climate Action

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

COMMENT:

Climate Change and GHG Reduction Targets

There is a requirement that companies identify reduction targets in GHG emissions. This is quite challenging for mines that have naturally occurring methane. We believe there is a need in the Climate Change performance

area to differentiate between emissions produced by mining operations such as electricity usage or fuel usage from the liberation of naturally occurring sources of GHGs such as mine methane, with naturally occurring sources to be outside the scope of net-zero emissions (unless the company chooses to account for those naturally occurring sources in their net-zero plan).

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

2. General Requirements for all Consolidated Standard-Related Reporting & Claims

COMMENT:

We would recommend making sure certain key performance areas such as human rights, tailings, pollution prevention, and closure are required for the logo claim at the good and leading practice levels.

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

We would recommend making sure certain key performance areas such as human rights, tailings, pollution prevention, and closure are required for the logo claim at the good and leading practice levels.