

CMSI Consultation Response

Respondent Details

NAME

Susan Joyce

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

Other: Consulting company

ORGANISATION

On Common Ground Consultants Inc.

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: 3: Meets expectations

QUESTION 2

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

Response: unsure

proof is in the pudding, as they say. Could look good on paper, so the actual roll out and balancing of power dynamics is critical for this to have credibility and improve performance

Document:
Assurance

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 21: Tailings Management

SECTION: Intent, Foundational Practice, 1

COMMENT:

There is a significant problem in the structure that has been set up, in which requirements may be commitments (such as Foundational Practice 1. for Tailings Management) that have no link to implementation. This divorce between a policy commitment and implementation leads quickly to window dressing/greenwashing. At a minimum, Item 1. of Good Practice - the actual implementation of the commitment - should be Foundational Practice or part of the same requirement. e.g. Publicly commit to and implement the GISTM or MAC TSM Protocol for tailings management.

COMMENT:

The ICMM Conformance Protocols should not be used going forward. They have reduced the Standard to a check-box exercise and in many cases have dumbed-down the meaning and intent of the Requirements such that it is easy for ICMM members to check the box, claim compliance without substantively addressing the expectations of the Requirement. I strongly recommend that an independent body develop a new set of protocols against which to evaluate conformance with GISTM that is NOT led by ICMM companies, and that is informed by the Expert Panel that developed GISTM, so that the intent is captured in the conformance expectations.

Performance Area 5: Human Rights

SECTION: 5.1 Human Rights, Good Practice, 2

COMMENT:

Human rights due diligence process should be considered foundational practice. Current Foundational practice section is toothless, with no substantive requirement to implement or act aligned with the UNGPs.

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

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

Foundational practices are too low, and allow window dressing behaviour by not linking commitments to actions.

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

allows companies to drop to a lowest common denominator. I consider this a very bad idea.

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

nothing to add