CMSI Consultation Response

Respondent Details

NAME
Anonymous

COUNTRY
United States

PERMISSION
Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER
Other: Consultant, former industry, active in SME

ORGANISATION
Anonymous

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: No Response

QUESTION 2
Does the proposed governance model ensure no single group is able to unduly influence decisions?
Response: unsure

Document: Assurance

3. Who Can Conduct External Assurance?

COMMENT:

Is merely attendance at the training sufficient to receive accreditation as an Assurance Provider?

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 accreditation process currently seems to only require that Assurance Providers attend a training course. Seems that there should be a more robust requirement to confirm that the Assurance Providers have the appropriate experience and capabilities to assess assurance.

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response Planning, Foundational Practice, 1

COMMENT:

To better align with the GISTM, one of the emergency scenarios should include catastrophic failure of the TSF.

SECTION: 10.1 Emergency Preparedness and Response Planning, Foundational Practice, 3

COMMENT:

Delete "and Crisis" from definition of EPRP

SECTION: 10.1 Emergency Preparedness and Response Planning, Leading Practice, 2

COMMENT:

As per above, glossary uses EPRP so should delete "and Crisis" from reference to the plan

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SECTION: 10.1 Emergency Preparedness and Response Planning

COMMENT:

The GISTM requires development of a long-term recovery plan, which is not mentioned in this section. Should this be here or elsewhere in the document?

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Foundational Practice, 1

COMMENT:

MAC's Tailings Management Protocol is much more generic than the GISTM and hence much easier to achieve an A-rating (versus full conformance with the GISTM). For instance, the GISTM requires multiple levels of reviews - EoR, ITRB, DSRs - while MAC specifies merely an annual audit (but not even who needs to do this, presumably the EoR). So, if MAC is good enough, then that is fine, but need to know that it is not an equivalent proposition.

SECTION: 21.1 Tailings Management, Good Practice, 1

COMMENT:

"conformance" is used for addressing GISTM requirements while MAC's TSM refers to A, B, C-rating approach - is there a specific rating that is being required/requested?

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

The style is easy to follow and the standard requirements for each of the levels are concise but generally complete.

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

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

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Document:
Claims
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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

This question is quite confusing. It seems it would be best to illustrate where a company sits on "each" of the performance metrics, not just an overall rating for performance. This would further support the suggestion herein that certain metrics, such as tailings management, be disclosed as to level of achievement.