CMSI Consultation Response

Respondent Details

NAME
Cecilia Balby

COUNTRY
Brazil

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

STAKEHOLDER
Other: Environmental and Social Consultant

ORGANISATION
Independent Consultant at Ciliar SS Ltda

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

Document:
Assurance

QUESTION 1
From your perspective, does the Assurance process meet your expectations of a robust, credible, replicable and transparent approach?
Response: 3: Meets expectations

in 3.1.1 Assurance Provider Qualifications, please consider making it explicit that a balanced team of environmental and social (not "or") professionals, and one of the professionals knowledgeable of the "human rights" lens and language is included in the assurance team.

Document:
Standard

Performance Area 13: Community Impacts and Benefits

COMMENT:

Include as part of the leading practice for socioeconomic development of communities, the design a local development (or regional development) plan based on a Theory of Change. Include the design and implementation of a robust M&E framework with indicators based on expected outcomes and impacts. Review Local development plans as appropriate on a periodical basis.

Performance Area 4: New Projects, Expansions and Resettlement

COMMENT:

The concept of vulnerable groups or the use of the term vulnerability in this session and in other sessions throughout the text (e.g. performance area 12, for instance) does not consider that vulnerability may be intrinsic (e.g. an elderly with a respiratory disease and a history of poor access to health services) or caused by a project (e.g. a formerly healthy worker who was exposed to particulates and now has a diagnosis of respiratory disease). Good practice would be to map affected parties and other stakeholders and the right holders, and while doing so, to identify vulnerabilities (intrinsic and/or caused historically or by other projects in the region), as well as periodical changes in the vulnerability status. This information is crucial to design and implement proper mitigation of impacts.

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: 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: 2: Below expectations

"Leading" sets the bar in how the top industries are performing - if most are performing below expectations of affected stakeholders, they will still be considered as leaders. I can't think of a better word, but anticipate this as a communication issue, some misunderstandings may occur and frustrate stakeholders.

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