

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (midstream/downstream)

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: 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

Document:  
Standard

## Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Identify and Address Community Impacts, Good Practice

COMMENT:

*As written, this section fails to address cumulative impacts, requiring only discrete, facility-level assessment of impacts to achieve "good" or "leading" performance.*

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SECTION: 13.1 Identify and Address Community Impacts

COMMENT:

*Leading practice should include an element of co-design for preventive and mitigation measures as well as a suite of leading indicators for key potential impacts. As described, leading practice is entirely retrospective.*

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## **Performance Area 19: Biodiversity, Ecosystem Services and Nature**

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Leading Practice

COMMENT:

*Leading practice should address cumulative impacts and forecast potential external stressors such as climate change impacts.*

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## **Performance Area 22: Pollution Prevention**

SECTION: 22.3 Non, GHG Air Emissions

COMMENT:

*Identify meteorological conditions that can lead to acute adverse air quality events and associated emergency response plans*

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SECTION: 22.3 Non, GHG Air Emissions

COMMENT:

*Monitoring of ambient air quality for key contaminants at locations of sensitive receptors.*

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SECTION: 22.3 Non, GHG Air Emissions

COMMENT:

*Leading practice should include predictive dispersion modeling of all sources within the facility airshed and an action plan to prevent adverse air quality events and related human health and environmental impacts.*

*To be truly leading, air quality monitoring should be in real time for high risk contaminants.*

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SECTION: 22.6 Accidental Polluting Releases, Leading Practice

COMMENT:

*Engage local communities and emergency responders in response plans and simulation exercises*

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SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Leading Practice

COMMENT:

*In addition to monitoring, develop predictive model for cumulative effects, action levels and response plans to prevent adverse impacts.*

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## Performance Area 24: Closure

SECTION: 24.1 Closure Management, Leading Practice

COMMENT:

*Collaborate with communities and affected stakeholders to establish closure acceptance criteria and metrics.*

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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: 3: Meets expectations

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