

# CMSI Consultation Response

## Respondent Details

NAME

Genevieve Campbell

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

Non-governmental organisation (NGO) / civil society organization (CSO)

ORGANISATION

Re:wild

## 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: 2: Below expectations

To be credible, effective, efficient you need to know how the principles will be monitored over time and how success is measured, how often audits are made, by whom, etc.

### 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: 2: Below expectations

Document:  
Standard

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

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 1

COMMENT:

*Consideration of impacts to World Heritage Sites: consider reformulating as follow*

*“Prohibit exploring or operating within World Heritage Sites and confirm DEMONSTRATE TO STAKEHOLDERS THAT any current or future operations adjacent to World Heritage Sites are not incompatible with the outstanding universal value for which they are designated and do not put their integrity at risk.”*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 2

COMMENT:

*Under “foundational practice” number 2, add AZE (Alliance for Zero Extinction).*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 5

COMMENT:

*Baseline survey: under “foundational practice” number 5, add that the baseline surveys need to be completed before any impacts occur (before exploration).*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 7

COMMENT:

*Monitoring: this aspect is extremely important and often not well thought of and followed through by projects. Under “foundational practice” number 7, it should specifically be mentioned that a Biodiversity Monitoring and Evaluation Plan” needs to be developed based on the framework state-pressure-response with clear thresholds that can trigger adaptive management.*

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

COMMENT:

*Special guidance for apes: to align with IFC PS6 GN73, we recommend that apes be granted special attention with a requirement to consult the IUCN SSC PSG SGA/SSA ARRC Task Force if the project is located within ape’s range, and that any habitat used by apes automatically triggers critical habitat. A paragraph could be included under “foundational practice” and could read as follow:*

*“Special consideration should be given to great apes (gorillas, orangutans, chimpanzees and bonobos) due to their anthropological significance. Where great apes may potentially occur, consult with the IUCN SSC PSG SGA/SSA ARRC Task Force as early as possible to assist in the determination of the occurrence of great apes in the project’s area of influence. Any area where there are great apes will be treated as critical habitat. Projects in such areas will be acceptable only in exceptional circumstances, and the ARRC Task Force must be involved for the development of any mitigation strategy.”*

*“The IUCN SSC PSG SGA/SSA ARRC (Avoid, Reduce, Restore and Conserve) Task Force was created in 2016 with the aim of improving the mitigation of impacts from large-scale development projects on ape populations and their habitats. Since then, we have provided*

*advice to more than 30 projects across Asia and Africa, and interacted directly with projects, companies, governments and lending institutions.*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Good Practice, 2

COMMENT:

*The number 2 under Good Practice should be moved to “foundational practice”. Achieving no net loss should be a “foundational practice” for any project.*

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

COMMENT:

*Transparency: under “good practice”, all project’s documents related to biodiversity should be publicly disclosed (including the ESIA, BMP/BAP, BMEP, etc), either on the company’s website or be made available upon request.*

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SECTION: 19.1 Biodiversity and Ecosystem Services and Nature

COMMENT:

*Degazetting: it would be good to include a point to highlight that companies should not demand/support degazettement or the changing of protected area’s boundaries to allow for mining, or buy a project or permit that has done so to facilitate its activities.*

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COMMENT:

*Legacy impacts: there is no mention of legacy impacts. We often see companies specializing in exploration that can then be bought out by another company that will proceed with the exploitation. Therefore the new company will say their baseline starts once they acquired the permit, and nobody will be held responsible for the impacts of exploration (or legacy impacts). It would be good if there would be mention of legacy impacts that should be accounted for when estimating the offset requirement for the project.*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*Biodiversity baseline: should be conducted within the area of influence prior to any impacts occurring (before exploration).*

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COMMENT:

*Mitigation hierarchy: it should be specified that the aim is no net loss of natural habitat but a net gain for critical habitat. The ARRC Task Force is also promoting the development of offsets in perpetuity that take consideration of legacy impacts.*

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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: 2: Below 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: 2: Below expectations

I am assuming their will be a guidance document?

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

I think it would be better to work with two levels, foundational and leading, and to make more of the as 'foundational'. For example, all members should aim to achieve no net loss, this is a minimum.

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

We have not reviewed this document.