

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

Australia

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

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: yes

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 1: Corporate Requirements

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Good Practice

COMMENT:

*Consider including guidance for this this can be demonstrated*

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SECTION: 1.2 Sustainability Reporting, Leading Practice, 2

COMMENT:

*While there is guidance on 'the scope of the independent audit ', consider wording to include: "Complete independent assurance on 'material issues/topics disclosed" in the annual sustainability report".*

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SECTION: 1.4 Risk Assessment, Foundational Practice, 1

COMMENT:

*Consider 'individual/s' to account for multiple risk owners*

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SECTION: 1.4 Risk Assessment, Foundational Practice, 2

COMMENT:

*Consider adding requirement aspect that risks should be assessed using a standard/documented assessment approach (e.g. that considers consequence and likelihood)*

---

SECTION: 1.4 Risk Assessment, Good Practice, 3

COMMENT:

*Consider adding "...and update the risk register annually or more frequently dependent on the level of risk."*

---

SECTION: Intent

COMMENT:

*'Develop and keep an up-to-date risk register and a Corporate Crisis Response Plan'. Consider if (for all PAs, if this type of wording is an intent of the performance area or rather requirements under the specific levels?)*

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## **Performance Area 10: Emergency Preparedness and Response**

COMMENT:

*Review PA for consistency with "Crisis" materials under PA 1.*

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## **Performance Area 11: Security Management**

SECTION: 11.1 Security Management, Good Practice, 5

COMMENT:

*Consider further clarity and guidance on which aspect of security arrangements. Many would not socialize activities unless there was a direct impact in the communities.*

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SECTION: 11.1 Security Management, Leading Practice, 1

COMMENT:

*Consider further clarity and guidance on communication, as interaction is not always possible with all local stakeholders.*

---

SECTION: 11.1 Security Management, Leading Practice, 2

COMMENT:

*Suggest “where applicable and possible” as MOUs are not possible everywhere due to government policy*

---

SECTION: 11.1 Security Management, Leading Practice, 4

COMMENT:

*Consider less direct language here from ‘require providers to implement’, i.e. there may be other measures companies can explore, such as including ICoCA membership in RFP process as a positive criteria.*

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## **Performance Area 16: Artisanal and Small-Scale Mining**

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Good Practice, 3

COMMENT:

*suggest that this should be leading practice*

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SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Good Practice, 4

COMMENT:

*Should this also be “legitimate” ASM operators*

---

SECTION: 16.1 ASM Risk Assessment, Engagement and Reporting, Leading Practice, 2

COMMENT:

*Consider the term “complementary livelihoods” over “alternative” livelihoods as current best practice. Economic development should be considered to be through and alongside ASM - it is a wealth generator for communities.*

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## **Performance Area 18: Water Stewardship**

SECTION: 18.1 Water Management and Performance, Foundational Practice, 2

COMMENT:

*Consider “hierarchy of control” within the requirement or within guidance.*

---

SECTION: 18.1 Water Management and Performance, Foundational Practice, 4

COMMENT:

*Include “over its operating life cycle and at closure”.*

*Consider: quality requirements are not included in "Basic Practice" level in ICMM Water Stewardship Maturity Framework*

---

SECTION: 18.1 Water Management and Performance, Foundational Practice, 5

COMMENT:

*comment 1. Rephrase "... risks and impacts to beneficial uses of surface water and groundwater downstream and downgradient..."*

*comment 2. Consider eliminating redundancy with 18.1.2*

---

SECTION: 18.1 Water Management and Performance, Foundational Practice, 6

COMMENT:

*Consider 'compliance performance' guidance, i.e. regulatory compliance*

---

SECTION: 18.1 Water Management and Performance, Good Practice, 1

COMMENT:

*Consider aligning with Foundational Practice 18.1.4*

---

SECTION: 18.1 Water Management and Performance, Good Practice, 2

COMMENT:

*Hydrogeological characterization and risk assessment should be Foundational (see Foundational Practice 18.1.5)*

---

SECTION: 18.1 Water Management and Performance, Good Practice, 3

COMMENT:

*Clarify is this for ESIA or during operations? See 4.1 Good Practice #2*

---

SECTION: 18.1 Water Management and Performance, Good Practice, 4

COMMENT:

*Clarify how this differs from Foundational Practice #5?*

---

SECTION: 18.1 Water Management and Performance, Good Practice, 6

COMMENT:

*Consider "Identify opportunities to improve the efficiency of process water use and recycled; reduction in freshwater consumed; and ..."*

---

SECTION: 18.1 Water Management and Performance, Good Practice, 7

COMMENT:

*Diversion is not a source control but rather an avoidance. Consider removing “evaluate source-control opportunities” or make this a separate requirement. And, change with “Evaluate contact water reduction opportunities...”*

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SECTION: 18.1 Water Management and Performance, Good Practice, 8

COMMENT:

*include “ecological health”.*

---

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 1

COMMENT:

*“Collaborative Watershed Management” may be a misnomer. Companies may have no formal role in managing watershed other than compliance with regulatory regime. Consider “Watershed Collaboration” instead.*

---

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 2

COMMENT:

*Suggest “Assign internal responsibility and accountability to ensure engagement...”*

---

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 3

COMMENT:

*There may be no implementation of IWRM whatsoever, so it would be better for Foundational Practice to refer to identifying relevant watershed regulatory mechanisms, as well as beneficial uses of water in the watershed, water users stakeholder and rights-holders*

---

SECTION: 18.2 Collaborative Watershed Management, Foundational Practice, 4

COMMENT:

*Foundational Practice should be identification, Good Practice should be engagement*

---

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 1

COMMENT:

*Consider “shared water challenges and opportunities” in lieu of “collective water issues”*

---

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 2

COMMENT:

*Consider “... and participate in the establishment of collective action” in lieu of “adaptive management plans”*

---

SECTION: 18.2 Collaborative Watershed Management, Leading Practice, 2

COMMENT:

*Consider “collective action” in lieu of “collaborative mitigation options”*

---

SECTION: 18.3 Water Reporting, Good Practice, 1

COMMENT:

*consider "...and relative to established objectives or targets, where applicable". Objectives/targets may not be set for all water accounting parameters*

---

SECTION: 18.3 Water Reporting, Leading Practice, 2

COMMENT:

*Consider further clarity regarding audit/assurance. i.e. is this equivalent to "Complete independent assurance on the annual sustainability report." PA 1.2 Leading Practice #2*

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

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Foundational Practice, 4

COMMENT:

*Consider "achieve stated biodiversity objectives and desired outcomes"*

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

COMMENT:

*Consider "hierarchy of control" and include "avoidance or reduction of future land disturbances"*

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

COMMENT:

*comment 1. Consider "hierarchy of control".*

*comment 2. This should be Foundational Practice consistent with ESIA requirements*

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## **Performance Area 2: Business Integrity**

SECTION: 2.1 Legal Compliance, Foundational Practice, 1

COMMENT:

*Consider modifications to the following two foundational requirements -*

*1) Establish processes to comply with applicable laws, including monitoring existing and emerging applicable laws. Identify key legal risks in the risk register.*

*2) Maintain a register of significant legal obligations, to be updated at defined intervals*

---

COMMENT:

*Consider replacement of term 'significant' here, to eg. 'material', 'key', etc. Regulators' would consider all requirements to be significant and it is challenging to define in the literal sense. Otherwise, include definition of "significant legal obligations" in guidance.*

---

SECTION: 2.1 Legal Compliance, Good Practice, 2

COMMENT:

*'Significant fine' is defined and suggests significant would be defined by corporate policy. It also includes situations which should be considered. Whereas 'regulatory actions' is very broad and no materiality threshold is applied. Ideally a materiality threshold would be included otherwise this may be difficult to manage from a practical perspective. Consider changing "regulatory actions" to "significant regulatory actions" and include a definition in guidance.*

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SECTION: 2.1 Legal Compliance, Leading Practice, 1

COMMENT:

*For greater clarity, consider "Conduct an internal audit of legal compliance on a defined interval to assess performance of a facilities expected systems, practices and controls for managing regulatory compliance. Track and manage corrective actions."*

---

SECTION: 2.2 Business Ethics and Accountability, Foundational Practice, 4

COMMENT:

*This section should include the 'Worker' definition or link to the Rights of Workers section's definition*

---

SECTION: 2.2 Business Ethics and Accountability, Leading Practice, 1

COMMENT:

*add "on a defined interval"*

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## **Performance Area 20: Climate Action**

SECTION: 20.2 Climate Change Management (Facility Level), Foundational Practice, 2

COMMENT:

*Consider "risks to infrastructure during operation and at closure".*

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## **Performance Area 21: Tailings Management**

SECTION: 21.1 Tailings Management, Foundational Practice, 1

COMMENT:

*Suggest separate out the prohibition on riverine tailings deposition*

---

SECTION: 21.1 Tailings Management, Good Practice, 2

COMMENT:

*Consider appropriateness, as this is extending GISTM beyond its original intent and these solutions would be subject to other environmental requirements.*

---

SECTION: 21.1 Tailings Management, Good Practice, 3

COMMENT:

*There is no interval for independent audits specified in the ICMM Conformance Protocols; note also that the ICMM Conformance Protocols will be superseded by conformance protocols to be developed by GTMI*

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SECTION: 21.1 Tailings Management, Good Practice, 4

COMMENT:

*There is no interval for public disclosure specified in the ICMM Conformance Protocols*

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

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Foundational Practice

COMMENT:

*Consider addressing redundancy with Foundational practice #2; consider separating out safe disposal from avoidance and reduction as it warrants focus*

---

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Foundational Practice

COMMENT:

*Consider going further. i.e. then do what with the information?*

---

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

*Having "adverse impacts" and "safe disposal" in the same sentence doesn't work - "safe disposal" implies that residual risk is managed to ALARP*

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COMMENT:

*Consider removing the information in parenthesis after "the environment" - it would be better to be non-specific - there are also potential waste impacts to air*

---

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

*Consider recycling, i.e., "objectives and/or targets related to waste and hazardous materials management, reduction and/or recycling".*

---

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

*comment 1. Remove "through safety data sheets and labelling".*

---



*comment 2. Is this redundant with Foundational Practice #4 or is this specific to “the products of mining” i.e., concentrates?*

---

SECTION: 22.2 Mineral Wastes, Foundational Practice, 1

COMMENT:

*comment 1. Consider mitigation hierarchy in this context, i.e., mineral waste generally cannot be prevented in the mining sector.*

*comment 2. Clarify why tailings excluded from this, as there is no equivalent clause in the Tailings Management performance area.*

---

SECTION: 22.2 Mineral Wastes, Foundational Practice, 2

COMMENT:

*Consider mineral waste generally cannot be avoided in the mining sector*

---

SECTION: 22.2 Mineral Wastes, Foundational Practice, 3

COMMENT:

*Consider mineral waste generally cannot be avoided in the mining sector*

---

SECTION: 22.2 Mineral Wastes, Good Practice, 1

COMMENT:

*clarify “acid rock drainage and metal leaching” or “acid and metalliferous drainage”*

---

SECTION: 22.2 Mineral Wastes, Leading Practice, 1

COMMENT:

*“development of actions”*

---

SECTION: 22.3 Non, GHG Air Emissions, Foundational Practice

COMMENT:

*this doesn’t need to be limited to “sensitive receptors” could simply say “receptors”*

---

SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

*see other comments on ESIA - risk and impact assessment should be Foundational*

---

SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

*“Establish objectives and targets...”*

---

SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

*Throughout document refer to mitigation hierarchy of control rather than minimize, reduce, avoid... "Monitor implementation of actions as per mitigation hierarchy of control regarding air emissions and ..."*

---

SECTION: 22.3 Non, GHG Air Emissions, Leading Practice

COMMENT:

*Clarify why this and noise/vibration are the only reference to participatory monitoring*

---

SECTION: 22.4 Mercury, Good Practice, 2

COMMENT:

*should this refer to "legitimate ASM"?*

---

SECTION: 22.4 Mercury, Leading Practice, 1

COMMENT:

*arguably this could be considered "Good Practice"*

---

SECTION: 22.4 Mercury, Leading Practice, 2

COMMENT:

*Clarify what "mercury prevention" is*

---

SECTION: 22.5 Cyanide, Foundational Practice, 2

COMMENT:

*Consider self-assessment is not included in other areas whereby commitment to another standard or code is called out (e.g., GISTM)*

---

SECTION: 22.5 Cyanide, Leading Practice, 1

COMMENT:

*Consider if this is beyond the scope of the standard and a similar practice is not included in other areas whereby commitment to another standard or code is called out (e.g., GISTM)*

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SECTION: 22.6 Accidental Polluting Releases, Good Practice, 3

COMMENT:

*Remove "residual" from "remediate residual adverse impacts" - there will be residual impacts from pollution events after remediation*

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SECTION: 22.7 Noise, Vibration and Light pollution/nuisance, Foundational Practice, 1

COMMENT:

*Consider if “shadow assessments”, “overpressure”, “visual impact (where applicable)” should be included in this section.*

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### **Performance Area 23: Circular Economy**

SECTION: 23.1 Circular Economy Management at all facilities, Foundational Practice, 1

COMMENT:

*Confirm that some of these requirements are not duplicated with other Sections such as Hazardous Materials or Tailings.*

---

COMMENT:

*Review redundancy with Water, Materials/Waste, Tailings, Closure, Responsible Supply Chains; suggest that this does not need its own category and can be broken out into others; consider also that ICMM will not continue Circular Economy WG through 2025+ strategy cycle*

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### **Performance Area 24: Closure**

SECTION: 24.1 Closure Management, Foundational Practice, 1

COMMENT:

*review whether this implies that perpetual water management / treatment would not be appropriate (“chemically stable” indicates that water management / treatment would not be required post-closure) - if so, this is probably higher than “Foundational Practice” though it is certainly the goal*

---

SECTION: 24.1 Closure Management, Good Practice, 8

COMMENT:

*Criteria could be clearer here, otherwise could be seen as foundational.*

---

SECTION: 24.1 Closure Management, Leading Practice, 1

COMMENT:

*Suggest an industry developed/approved method to publicly disclose financial provisions.*

---

SECTION: 24.1 Closure Management, Leading Practice, 2

COMMENT:

*Redundant with Good Practice #2?*

---

### **Performance Area 3: Responsible Supply Chains**

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Good Practice, 5

COMMENT:

*This is confusing as written. Are we saying the company caused or contributed to an impact or their business partner caused or contributed to an impact? Those are two different things, with two different levels of responsibility. Saying "business relationship" makes it sounds like it was the way the company was behaving that caused the impact.*

*Consider: "Where appropriate and feasible, work with business partners to support remedy where the Facility's prioritized business partners have caused or contributed to adverse impacts."*

*(i.e., if an up or downstream business partner has caused or contributed to an adverse impact, the company should use its leverage to support the business partner remediating the impact. Support does not mean a financial obligation or other means of direct remedy.)*

---

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Leading Practice, 2

COMMENT:

*Consider: Where appropriate and feasible, and where the facility has become aware of business partners that have caused or contributed to adverse impacts, collaborate with those business partners to support remedy.*

---

SECTION: 3.1 Responsible Supply Chain (applicable to all facilities), Leading Practice, 3

COMMENT:

*Consider: Where appropriate and feasible, collaborate with prioritised business partners, government and other stakeholders to increase leverage over business relationships that are causing or contributing to adverse impacts, with due regard to applicable competition law.*

---

SECTION: Intent

COMMENT:

*For greater clarity, consider: "Establish risk-based due diligence processes in supply chains to identify environment, social and governance risks and impacts appropriate to the size and location of the Facility, and the nature of the products or services involved."*

---

COMMENT:

*Consider reviewing the use of "business relationships" and "business partner" in this section. Saying "business relationship" in this context often makes it sounds like it was the way the company was behaving that caused the impact.*

---

## **Performance Area 4: New Projects, Expansions and Resettlement**

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Good Practice, 3

COMMENT:

*Consider if this should be Foundational. Mitigation of significant adverse impact risks should be foundational and would be required under most jurisdictions. Management plans for cumulative impacts could sit within Good Practice as the proponent may not have control over all impacts. Collaboration with other parties contributing to cumulative impacts is under Leading Practice*

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SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Good Practice, 4

COMMENT:

*clarify to 'update the management plans'*

---

SECTION: 4.1 Risk and Impact Assessments of New Projects and Expansions, Good Practice, 5

COMMENT:

*Suggestion only: Consider disclosure to affected communities as Foundational. Good or leading practice should include reporting on monitoring of impacts vs. predictions and effectiveness of management plans.*

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SECTION: 4.2 Land Acquisition and Resettlement, Leading Practice, 3

COMMENT:

*Consider clarity: Does this include an external review of the implementation and monitoring or is it a review of the resettlement action plan document?*

---

SECTION: Intent

COMMENT:

*Many parts of the intent are listing the requirements of the levels, e.g. Develop management plans in consultation with affected stakeholders. Consider expanding on the key intent i.e., 'Minimise the environmental and social risks and impacts of new projects as well as significant changes or expansions of existing operations.'*

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## **Performance Area 7: Rights of Workers**

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Good Practice, 12

COMMENT:

*Suggest this should be Foundational*

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SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Good Practice, 17

COMMENT:

*Clarify if 'employment practices' refers to 'responsible recruitment' as defined in guidance.*

---

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Good Practice, 8

COMMENT:

*Consider 'access to technology that enables connection with home' (e.g. Wi-Fi, internet, phones), and adequate 'facilities for sleep' to mitigate fatigue impacts (sleep hygiene could also be include in PA 9).*

---

SECTION: 7.1 Workers' Rights Risk, Mitigation and Operational Performance, Good Practice, 9

COMMENT:

*Consider including daily working time limits, i.e. daily working time, including travel is not to exceed 14 hours.*

---

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Foundational Practice, 1

COMMENT:

*Appreciating there is the whistle blower option in the Business Integrity section, but there is a benefit to including an anonymous option for these grievances too. Consider adding 'anonymously if they wish' after "... concerns raised by workers'.*

---

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Good Practice, 1

COMMENT:

*Consider including something on accessibility of the grievance mechanism*

---

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Good Practice, 2

COMMENT:

*Consider including 'in accordance with any confidentiality requirements'.*

---

SECTION: 7.2 Grievance Mechanism for Employees and Contractors (Workers), Leading Practice, 3

COMMENT:

*typo on "preventive", should it be 'preventative"*

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## **Performance Area 8: Diversity, Equity, and Inclusion**

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 5

COMMENT:

*Consider establish a process 'and criteria'...*

---

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Leading Practice, 2

COMMENT:

*Consider for leading practice the objectives should be set for the DEI strategy (e.g. broader than recruitment).*

---

SECTION: 8.2 Diversity, Equity, and Inclusion Management (Facility Level), Foundational Practice

COMMENT:

*Consider if requirement 1, 3, 4, 5 should also be applicable at corporate level*

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## **Performance Area 9: Safe, Healthy and Respectful Workplaces**

SECTION: 9.1 Health and Safety Management, Foundational Practice, 6

COMMENT:

*Consider for clarity making 'at no cost to the individual'*

---

SECTION: 9.1 Health and Safety Management, Good Practice, 2

COMMENT:

*Consider separating ergonomics from this sentence. There are a number of more suitably qualified roles/professions for reviewing the adequacy of ergonomic risks and controls than a qualified hygienist.*

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COMMENT:

*Root Cause Analysis is very specific methodology with others that work just as well. Consider "investigation processes to determine causal pathways and resulting action planning to prevent a similar occurrence in the future." Also consider alignment with wording of 9.4.6*

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SECTION: 9.1 Health and Safety Management, Leading Practice, 2

COMMENT:

*This is a similarly worded to requirement 9.1 2.c which is noted as a Good Practice. A Leading Practice would be 'assurance over' rather than 'oversight of' the IH Program by a qualified hygienist.*

---

SECTION: 9.2 Psychological Safety and Respectful Workplaces, Foundational Practice, 1

COMMENT:

*Consider language about violence in this section or in 9.1.1 to change from 'promote' and 'publicly state' to 'provide' work environment free from violence.*

---

SECTION: 9.2 Psychological Safety and Respectful Workplaces, Leading Practice, 4

COMMENT:

*Good to see this included*

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SECTION: 9.2 Psychological Safety and Respectful Workplaces, Leading Practice, 6

COMMENT:

*Consider 'culturally appropriate' psychological support within this leading practice*

---

SECTION: 9.3 Training, Behaviour and Culture, Foundational Practice, 2

COMMENT:

*Consider including provision of awareness material on how to recognise and report psychosocial hazards, disrespectful behaviour and how to seek support*

---

SECTION: 9.3 Training, Behaviour and Culture, Good Practice, 1

COMMENT:

*f. Consider removing 'safety' from this and just leaving 'how to flag concerns' - or change to 'how to flag physical and psychological safety and behavioural concerns'*

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SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 2

COMMENT:

*Is the assumption that this 'performance' is measured against whatever objectives the company/facility has set? If so, does psychological safety need to be added to 9.4.1 'Establish xx objectives'? If yes, 9.4.1 would be 'Establish psychological and physical safety and health performance objectives and/or targets for workers.'*

---

SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 5

COMMENT:

*Suggest 0 fatalities as foundational practice. Fatality prevention is an expectation on our industry and not an ambition or discretionary as may be construed by its inclusion as a good practice. i.e. if a fatality has occurred on a site, how can we say they reach Good Practice for this PA, for the year?*

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SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 6

COMMENT:

*This language could be applied to 9.1 Good Practice (e)*

---

SECTION: Glossary and Interpretive Guidance

COMMENT:

*The definitions of Psychosocial risks and Psychosocial hazards appear to be switched in the guidance section*

---

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