

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

South Africa

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Supplier / business partner

ORGANISATION

Anonymous

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Governance

10. Would other Committees be established?

COMMENT:

What will the fines, penalties for non compliance for members that have pre-scribed to the standard

5. What does the overall governance model look like?

COMMENT:

Who will be the board be accountable too?

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: 4: Exceeds expectations

Document:
Standard

Introduction

COMMENT:

No reference to Air quality and waste management

COMMENT:

The correct mitigation hierarchy is avoid-mitigate-manage by rehabilitating, treating, recycling, then only consider offset and failing that compensate

Performance Area 10: Emergency Preparedness and Response

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

COMMENT:

What if there is statutory changes in the year? What if personal change during the year? What if the service provider changes to assist in emergency preparedness?

Performance Area 18: Water Stewardship

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

COMMENT:

Why not communicate major non compliances with regulators, host communities?

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

COMMENT:

Why must water only be managed in the operational phase. What about pre-feasibility, feasibility, decommissioning and mine closure phases?

SECTION: 18.1 Water Management and Performance, Good Practice

COMMENT:

why not communicate non compliance in terms of water management to regulators and communities as they affected and impacted?

Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

Water and air quality does not know boundaries, what if the operations far from World heritage sites but still impact significantly on water and air quality resources? Should the impact just be ignored and not managed at all? What about offset and compensation in such cases for the loss in biodiversity and ecosystem services and the functionality of such?

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

COMMENT:

Why should users affected not be compensated in full for ecosystem services loss of functionality and loss of biodiversity in perpetuity?

COMMENT:

Does no net loss get measured on science or soft sciences like social issues, just to justify achievement of no net loss, while certain elements and ecosystem services and functionality have been totally destroyed in perpetuity?

SECTION: 19.1 Biodiversity and Ecosystem Services and Nature, Leading Practice, 3

COMMENT:

Does net gain get based on sound science or soft sciences like social and labour to get a license to disturb and trash? It must be based on sound proven science and the mitigation hierarchy followed as intended and not bypassed and abused.

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management, Leading Practice

COMMENT:

Is leading practice not zero waste and thus zero tailings solutions? as we even committing to net gains in biodiversity/ ecosystem services. This leading practices not just business as usual.

Performance Area 22: Pollution Prevention

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

COMMENT:

What about avoid waste, by using alternative products that don't generate waste?

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

COMMENT:

Should zero waste not be the leading practice? If we are committing to net positive impacts? Otherwise, are we fooling?

SECTION: 22.2 Mineral Wastes, Leading Practice, 1

COMMENT:

Leading practice will not only be to engage but to fully compensate and rehabilitate and treat water and cause zero waste to communities. Otherwise, the commitment of Net positive impact on environmental and communities is not even worth the paper it is written on?

SECTION: 22.3 Non, GHG Air Emissions, Leading Practice

COMMENT:

Leading practice is to compensate fully and but practice in place for zero waste generation, not just engaging stakeholders.

SECTION: 22.4 Mercury

COMMENT:

Why only Mercury, what about all other hazardous chemicals and substances?

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Leading Practice, 1

COMMENT:

Leading practice is not to estimate closure costs, it is to know precisely and accurately.

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

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

Good systems