

CMSI Consultation Response

Respondent Details

NAME

Alice Evans

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

SRK Consulting

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: 4: Exceeds expectations

Document:
Standard

Performance Area 12: Stakeholder Engagement

SECTION: 12.1 Stakeholder Identification and Engagement, Foundational Practice

COMMENT:

Foundation level requirement to assign appropriate resources, responsibility and accountability to manage stakeholder engagement (e.g. community liaison officers and at the facility senior management level)

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Foundational Practice

COMMENT:

A basic water balance model should be a foundational requirement for the facility

Performance Area 19: Biodiversity, Ecosystem Services and Nature

COMMENT:

Other applicable performance areas list should include human rights in the list. The latest Human Right (to a clean, healthy and sustainable environment) means environment harms are human rights harm's and vice versa. This standard still keeps the two disciplines quite separate, we should be looking at environmental impacts through a human rights lens.

Performance Area 2: Business Integrity

SECTION: 2.1 Legal Compliance, Foundational Practice

COMMENT:

Foundational practice should be to have a legal compliance / obligations register that is kept up to date and demonstrates the status. This is a gap in GISTM and other standards as legal compliance is 'assumed' but not a standard requirement. If it part of auditable criteria it will be actioned and far too many companies still do not know all of their legal obligations.

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

There should be some performance areas that must be met, anything that could cause a fatality if not in place for example?

Could have on ramp for early adopters as a logo saying they are CMSI 'in progress' but they must disclose the date in which they will reach 'good'?

Leading practice for all performance areas should merit use of a 'Gold Standard' logo that companies can use with pride at achieving the best result.