

# CMSI Consultation Response

## Respondent Details

NAME

Luc Lapointe

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

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

ORGANISATION

Capitals Hub Canada

## 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

## Introduction

COMMENT:

*Integrating Artisanal and Small-scale Mining into Consolidated Mining Standard Initiatives: Recommendations for a Sustainable Future*

*Introduction - Importance of Interoperability Between Reporting Standards*

*The interoperability of reporting standards across different jurisdictions represents a critical cornerstone for creating an inclusive and efficient global mining sector that accommodates both Artisanal and Small-scale Mining (ASM) and Large-scale Mining (LSM) operations. In an increasingly interconnected mineral supply chain, the lack of harmonization between various national and regional reporting requirements creates significant barriers to market access, particularly for ASM operators who often lack the resources to navigate multiple compliance frameworks. This fragmentation of standards not only increases operational costs and administrative burdens but also creates potential loopholes that can be exploited for mineral laundering or the circumvention of due diligence requirements. A harmonized approach to reporting standards would create a level playing field where both ASM and LSM operators can participate in formal supply chains while maintaining appropriate levels of transparency and accountability.*

*The development of interoperable reporting standards holds particular significance for cross-border mineral trade and downstream supply chain due diligence. For instance, an ASM operation in the Democratic Republic of Congo should be able to demonstrate compliance with local requirements while simultaneously meeting the expectations of buyers in European markets governed by the EU Conflict Minerals Regulation, or Asian markets with their own distinct reporting requirements. This interoperability can be achieved through the establishment of “equivalency frameworks” that recognize comparable elements across different standards, reducing the need for multiple audits and certifications. Such frameworks would particularly benefit ASM operators by allowing them to leverage a single compliance effort to access multiple markets, thereby reducing costs and administrative complexity while maintaining robust due diligence standards.*

*Furthermore, interoperable reporting standards can facilitate more effective collaboration between ASM and LSM operations, particularly in cases where they operate in proximity or share supply chains. When both sectors operate under harmonized reporting frameworks, it becomes easier to implement joint monitoring systems, share best practices, and create integrated supply chain documentation. This alignment also supports governments and regulatory bodies in their oversight functions by providing consistent data sets and comparable metrics across different scales of mining operations. The result is a more coherent and transparent mining sector where both ASM and LSM operators can demonstrate their compliance with international standards while maintaining their distinct operational characteristics and addressing their unique challenges. This harmonization ultimately contributes to the broader goal of creating a more inclusive and sustainable mining industry that recognizes and supports the legitimate role of both ASM and LSM operators in global mineral supply chains.*

## *Executive Summary*

*Artisanal and Small-scale Mining (ASM) represents a crucial yet often overlooked sector of the global mining industry, providing livelihoods for millions of people worldwide. The integration of ASM operations into Consolidated Mining Standard Initiatives (CMSI) presents both significant challenges and opportunities for creating a more inclusive and sustainable mining sector. This introduction explores key recommendations for bridging the gap between formal mining standards and ASM practices, emphasizing the importance of adaptive approaches that consider the unique characteristics of artisanal mining communities.*

## *Context and Background*

*The ASM sector employs an estimated 40 million people globally, with an additional 150 million people indirectly depending on it for their livelihoods. Despite its significant economic and social importance, particularly in developing countries, ASM often operates outside formal regulatory frameworks and standard initiatives. This exclusion has led to persistent challenges including environmental degradation, poor working conditions, social conflicts, and limited access to formal markets.*

*Traditional mining standards and certification schemes have primarily been designed for large-scale mining operations, with requirements and compliance mechanisms that are often impractical or impossible for ASM operators to meet. This misalignment has created a two-tier system in the mining sector, where artisanal miners face increasing marginalization despite their crucial role in global mineral supply chains.*

## *The Need for Integration*

*The integration of ASM into consolidated mining standards is not merely a matter of compliance or formalization; it represents a fundamental shift in how the global mining sector approaches sustainability and inclusivity. Several factors make this integration both necessary and timely:*

### *1. Growing Market Demand for Responsible Sourcing*

*Contemporary consumers and downstream buyers increasingly demand transparency and ethical sourcing in their mineral supply chains. The integration of ASM into formal standards can help meet these market requirements while providing artisanal miners with better access to legitimate markets and fair prices for their products.*

### *2. Sustainable Development Goals Alignment*

*The formalization and improvement of ASM practices directly contributes to multiple United Nations Sustainable Development Goals (SDGs), including poverty reduction (SDG 1), decent work and economic growth (SDG 8), and responsible consumption and production (SDG 12). Effective integration strategies can help accelerate progress toward these global objectives.*

### *3. Climate Change and Environmental Protection*

*As the world transitions to low-carbon technologies, demand for critical minerals often sourced through ASM is increasing. Incorporating ASM into formal standards can help ensure this growing demand doesn't lead to environmental degradation but instead promotes sustainable mining practices.*

## *Key Recommendations for Integration*

### *1. Adaptive Standard Development*

*Traditional mining standards must be reimagined to accommodate ASM realities while maintaining core sustainability principles. This requires:*

- Development of tiered certification systems that allow for progressive improvement rather than immediate full compliance*
- Creation of specific ASM-focused criteria that reflect operational scale and technical capabilities*
- Integration of local knowledge and traditional mining practices into standard requirements*
- Establishment of simplified documentation and verification processes suitable for ASM operators*

### *2. Capacity Building and Technical Support*

*Successful integration requires comprehensive support mechanisms:*

- Implementation of training programs focused on sustainable mining practices, safety protocols, and environmental management*
- Development of local technical support networks to assist with standard compliance*
- Creation of knowledge-sharing platforms between ASM communities*
- Provision of appropriate technology and equipment to improve efficiency and reduce environmental impact*

### *3. Financial Mechanisms and Market Access*

*Economic viability is crucial for sustainable integration:*

- Establishment of fair financing mechanisms to support standard implementation*
- Development of direct market access channels for certified ASM products*
- Creation of price premium systems for standard-compliant ASM minerals*
- Implementation of group certification schemes to reduce individual costs*

### *4. Governance and Stakeholder Engagement*

*Effective integration requires inclusive governance structures:*

- *Creation of multi-stakeholder platforms for standard development and implementation*
- *Integration of ASM representatives in decision-making processes*
- *Development of local monitoring and verification systems*
- *Establishment of grievance mechanisms accessible to ASM communities*

#### *5. Policy and Regulatory Framework Alignment*

*Success depends on supportive policy environments:*

- *Harmonization of national mining regulations with international standards*
- *Development of specific legal frameworks for ASM operations*
- *Creation of incentives for formal sector engagement with ASM*
- *Establishment of clear land rights and mining titles for ASM operators*

#### *Implementation Considerations*

*The successful integration of ASM into consolidated mining standards requires careful consideration of several key factors:*

##### *Phased Implementation*

*Integration should follow a gradual, phased approach that allows ASM operators to build capacity and resources over time. This might include:*

- *Initial focus on basic safety and environmental requirements*
- *Progressive introduction of more complex standard elements*
- *Regular assessment and adjustment of implementation timelines*
- *Flexible verification mechanisms during transition periods*

##### *Regional Adaptation*

*Standard requirements and implementation strategies must be adapted to regional contexts:*

- *Consideration of local cultural practices and traditional mining methods*
- *Adaptation to specific geological and environmental conditions*
- *Recognition of varying regulatory frameworks and governance systems*
- *Accommodation of different market access opportunities and constraints*

##### *Stakeholder Support Networks*

*Success depends on building robust support networks:*

- *Engagement of local government agencies and regulatory bodies*
- *Participation of civil society organizations and community groups*
- *Involvement of technical experts and training providers*
- *Collaboration with formal mining companies and downstream buyers*

##### *Expected Outcomes*

*Successful integration of ASM into consolidated mining standards can deliver multiple benefits:*

##### *Social Benefits*

- *Improved working conditions and safety standards*

- *Enhanced community development and social stability*
- *Better access to health and education services*
- *Reduced child labor and gender discrimination*

#### *Environmental Benefits*

- *Reduced mercury uses and environmental contamination*
- *Improved land rehabilitation practices*
- *Better waste management systems*
- *Enhanced biodiversity protection*

#### *Economic Benefits*

- *Increased access to formal markets and fair prices*
- *Improved productivity and efficiency*
- *Better access to financing and technical support*
- *Enhanced local economic development*

#### *Conclusion*

*The integration of ASM into consolidated mining standards represents a crucial step toward creating a more inclusive and sustainable mining sector. While challenges exist, the potential benefits for both ASM communities and the broader mining industry make this integration essential. Success requires commitment from all stakeholders, adaptive approaches, and sustained support mechanisms.*

*The recommendations outlined above provide a framework for beginning this integration process, but implementation must be flexible and responsive to local contexts. As the mining sector continues to evolve, the inclusion of ASM in formal standards will become increasingly important for ensuring sustainable resource extraction and equitable development outcomes.*

*Moving forward, continued research, stakeholder engagement, and practical experimentation will be crucial for refining these recommendations and developing effective integration strategies. The success of these efforts will play a vital role in shaping the future of the global mining sector and its contribution to sustainable development.*

#### *Recommendations for ASM Integration into CMSI*

##### *1. Recognition and Formalization*

- *Establish clear pathways for ASM recognition within the CMSI framework*
- *Create simplified registration processes for ASM operators*
- *Develop tiered compliance requirements based on operation size*
- *Implement gradual formalization timelines with clear milestones*

##### *2. Technical Standards Adaptation*

- *Modify existing technical requirements to accommodate ASM capabilities*
- *Develop specific environmental management guidelines for ASM operations*
- *Create scaled safety protocols appropriate for small-scale operations*
- *Establish basic equipment and technology standards achievable by ASM operators*

##### *3. Capacity Building and Support*

- *Integrate training programs for ASM operators on CMSI requirements*

- *Provide technical assistance for environmental management*
- *Establish mentorship programs between large-scale mines and ASM operations*
- *Create resource centers for technical and compliance support*

#### *4. Economic Considerations*

- *Develop flexible fee structures based on operation size*
- *Create microfinance options for compliance-related improvements*
- *Establish fair market access mechanisms*
- *Implement revenue-sharing models with local communities*

#### *5. Social and Community Integration*

- *Recognize traditional mining rights and practices*
- *Incorporate community consultation requirements*
- *Establish conflict resolution mechanisms*
- *Create local development requirements tied to ASM operations*

#### *6. Environmental Protection*

- *Develop simplified but effective environmental impact assessment tools*
- *Create practical waste management guidelines*
- *Establish water protection protocols*
- *Implement progressive land rehabilitation requirements*

#### *7. Monitoring and Compliance*

- *Create peer-monitoring systems within ASM communities*
- *Establish simplified reporting mechanisms*
- *Develop mobile-based monitoring tools*
- *Implement progressive enforcement mechanisms*

#### *8. Market Access and Traceability*

- *Develop simplified chain of custody requirements*
- *Create ASM-specific traceability systems*
- *Establish direct market access channels*
- *Implement fair pricing mechanisms*

#### *9. Gender and Social Inclusion*

- *Establish requirements for women's participation*
- *Create youth employment guidelines*
- *Implement protection measures for vulnerable groups*
- *Develop community benefit-sharing mechanisms*

#### *10. Implementation Framework*

##### *Short-term (1-2 years)*

- *Establish baseline ASM operations data*

- *Develop initial registration systems*
- *Create basic training programs*
- *Implement pilot projects*

#### *Medium-term (2-5 years)*

- *Roll out full technical assistance programs*
- *Implement comprehensive monitoring systems*
- *Establish market access mechanisms*
- *Develop community development programs*

#### *Long-term (5+ years)*

- *Achieve full integration of ASM into CMSI*
- *Establish sustainable monitoring systems*
- *Create self-sustaining support mechanisms*
- *Implement comprehensive market access systems*

#### *11. Risk Management*

- *Develop specific risk assessment tools for ASM operations*
- *Create mitigation strategies for common ASM challenges*
- *Establish emergency response protocols*
- *Implement progressive improvement plans*

#### *12. Stakeholder Engagement*

- *Create multi-stakeholder consultation mechanisms*
- *Establish regular review and feedback systems*
- *Implement adaptive management approaches*
- *Develop communication strategies for all stakeholders*

### *Addressing CMSI Gaps for LSM-ASM Cooperation*

#### *1. Legal and Regulatory Framework Gaps*

##### *Current Limitations*

- *Lack of clear legal definitions for LSM-ASM cooperation*
- *Absence of formal cooperation agreements templates*
- *Insufficient guidance on shared resource management*
- *Limited recognition of traditional mining rights*

##### *Required Additions*

- *Standardized cooperation agreement frameworks*
- *Clear legal mechanisms for resource sharing*
- *Dispute resolution protocols*
- *Recognition of customary rights within LSM concessions*

## 2. Operational Integration Mechanisms

### *Current Limitations*

- *Absence of technical standards for shared operations*
- *Limited guidance on safety protocols in shared spaces*
- *Unclear responsibilities in joint environmental management*
- *Lack of equipment sharing protocols*

### *Required Additions*

- *Joint operational guidelines*
- *Shared safety management systems*
- *Collaborative environmental monitoring*
- *Equipment and infrastructure sharing frameworks*

## 3. Economic Partnership Models

### *Current Limitations*

- *Absence of fair pricing mechanisms*
- *Limited guidance on profit-sharing arrangements*
- *Unclear value chain integration protocols*
- *Insufficient market access mechanisms*

### *Required Additions*

- *Standardized fair pricing frameworks*
- *Transparent profit-sharing models*
- *Value chain integration guidelines*
- *Joint market access strategies*

## 4. Knowledge Transfer and Capacity Building

### *Current Limitations*

- *Limited mechanisms for technical knowledge sharing*
- *Absence of mentorship program frameworks*
- *Insufficient guidance on training programs*
- *Lack of technology transfer protocols*

### *Required Additions*

- *Structured knowledge transfer programs*
- *Formalized mentorship frameworks*
- *Joint training initiatives*
- *Technology sharing guidelines*

## 5. Environmental Management Integration

### *Current Limitations*

- *Unclear responsibilities in shared environmental impacts*



- *Limited guidance on joint rehabilitation efforts*
- *Absence of shared waste management protocols*
- *Insufficient water management guidelines*

*Required Additions*

- *Joint environmental management systems*
- *Collaborative rehabilitation programs*
- *Shared waste management protocols*
- *Integrated water management frameworks*

*6. Social Responsibility and Community Development*

*Current Limitations*

- *Limited guidance on joint community engagement*
- *Unclear shared social responsibility frameworks*
- *Absence of combined local development initiatives*
- *Insufficient stakeholder engagement protocols*

*Required Additions*

- *Joint community development programs*
- *Shared social responsibility frameworks*
- *Combined local employment initiatives*
- *Integrated stakeholder engagement mechanisms*

*7. Security and Conflict Management*

*Current Limitations*

- *Insufficient guidance on shared security arrangements*
- *Limited conflict prevention mechanisms*
- *Unclear protocols for managing tensions*
- *Absence of joint risk management frameworks*

*Required Additions*

- *Collaborative security management systems*
- *Conflict prevention and resolution protocols*
- *Joint risk assessment frameworks*
- *Shared emergency response systems*

*8. Monitoring and Reporting*

*Current Limitations*

- *Limited guidance on joint monitoring systems*
- *Unclear shared reporting requirements*
- *Absence of combined audit protocols*
- *Insufficient transparency mechanisms*

#### *Required Additions*

- *Integrated monitoring frameworks*
- *Joint reporting systems*
- *Combined audit protocols*
- *Shared transparency mechanisms*

#### *9. Financial Integration*

##### *Current Limitations*

- *Limited guidance on financial cooperation*
- *Unclear cost-sharing mechanisms*
- *Absence of joint investment frameworks*
- *Insufficient credit access protocols*

##### *Required Additions*

- *Financial cooperation frameworks*
- *Cost-sharing guidelines*
- *Joint investment mechanisms*
- *Shared credit access systems*

#### *10. Implementation Support Tools*

##### *Required Additions*

- *Practical cooperation templates*
- *Implementation guidelines*
- *Performance indicators*
- *Success measurement tools*
- *Best practice case studies*
- *Adaptive management frameworks*

#### *11. Innovation and Technology*

##### *Required Additions*

- *Joint technology development frameworks*
- *Shared innovation platforms*
- *Digital integration systems*
- *Collaborative research programs*

#### *12. Governance and Oversight*

##### *Required Additions*

- *Joint governance structures*
- *Shared decision-making frameworks*
- *Combined oversight mechanisms*
- *Integrated compliance systems*

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: 2: Below 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

We have pooled our comments into one answer in the CSMI document (introduction). As you will see we did not specifically speak about Capitals Coalition reporting framework as they are quite complex but would be an excellent tool that is currently being used and promoted by the Global Partnership on Business and Biodiversity