

CMSI Consultation Response

Respondent Details

NAME

James Anstey

COUNTRY

Australia

PERMISSION

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

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

Prediktivity Pty Ltd

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: no

It is unclear what decisions the board will be making and what authority they will have to implement these. Perhaps documenting this using an approach like the RAPID decision framework would help to clarify what are the key decisions that will be made. E.g., Approval and removal of certifications, etc.

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

SECTION: 1) Structure of the Consolidated Mining Standard

COMMENT:

Alignment to the language of ESG

Why are the groupings not specifically aligned to the language of ESG? Most of our clients are reporting sustainability to the ESG frame of reference. We recommend that the groupings should be Safety & Health, Environment, Social, Governance. This matches the four pillars but is familiar / consistent language across industry.

SECTION: 2. Levels of Performance

COMMENT:

Levels of performance

Why have we lost the concept of major and minor non-conformances? The new category titles are a dilution of this concept that reduces the call to action. For example, the categories titles would suggest that Foundational Practice is acceptable, but it is not. E.g., 9.4 Monitoring, Performance and Reporting under good practice the requirement is to "record zero fatalities in the reporting year". This suggests for Foundational Practice it is acceptable to have fatalities. This is clearly not the case.

There must be a category below Foundational Practice with no requirements for if no requirements are met. This is not defined, what is it?

COMMENT:

Alignment with ISO standards

Why have the requirements for Management Systems been removed or not included at the top level? Why has this standard lost alignment with ISO? I.e., areas that would include an Environmental Management System, an Occupational Health & Safety System, a Risk Management System.

Most people are familiar and/or being audited to an ISO standard, it is unclear why the standard would not define these as areas. We will note later that risk management is not adequately covered.

COMMENT:

Alignment with SASB and GRI

There does not appear to be good alignment to SASB or GRI with the performance areas. For Environment, SASB defines: GHG Emissions, Air Quality, Energy Management, Waste and Wastewater Management, Waste and Hazardous Materials Management, Ecological Impacts. GRI are quite similar. It would seem preferable to align to a more common structure explicitly splitting out air, water and waste. Where possible it is desirable to align to existing standards.

Performance Area 1: Corporate Requirements

SECTION: 1.1 Board and Executive Accountability, Policy and Decision

COMMENT:

Where is the explicit requirement for audit and assurance within the standard? Or is this only included in the governance document?

SECTION: 1.4 Risk Assessment

COMMENT:

The section 1.4 Risk Assessment appears to be one of the shortest sections in the standard. This does not give credibility to risk management as a cross-cutting process that all team must implement at all levels of the business. As described above, if the Performance Areas aligned to ISO standards, then Risk Management would be an explicit area. Risk management needs more emphasis.

Performance Area 9: Safe, Healthy and Respectful Workplaces

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

COMMENT:

Requirement (or criteria) 2 has too many verifications that are independent and should be split out into separate requirements that have associated evidence requirements and next steps.

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

We have documented our thoughts on alignment to other standards.

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

There appears a lack of defined required evidence and also next steps for improvement.

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: 1: Significantly below

We have documented that we believe this is not a beneficial move from the standard ISO style conformance scale. I.e., Does not Meet (major non-conformance), Partially Meets (major non-conformance), Substantially Meets (minor non-conformance), Meets (conforming), Exceeds (leading practices). In the scale defined Substantially Meets = Foundational, Meets = Good, and Exceeds = Leading. There must be at least on scale below for major non-conformances.

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

It should not be possible to have areas that are sub-par to achieve the "logo". This is particularly true of safety and health. Good Practice or above must be achieved across all performance areas.