

# Assurance Process:

Response to feedback received through  
the first public consultation

October 2025

Consolidated Mining Standard Initiative



ICMM



WORLD  
GOLD  
COUNCIL

# 1 Introduction

## 1.1 Preamble

This document lays out the response of the Consolidated Mining Standard Initiative (CMSI) Partners to the feedback received on the Assurance Process from the CMSI public consultation between 16 October and 16 December 2024. Separate Response to Feedback Reports from the first public consultation are available for the [Governance Model](#) and the Consolidated Standard and Claims Policy (previously called Reporting and Claims Policy) on the [CMSI website](#).

In this response we have attempted to faithfully respond to all the points raised as summarised within the [ERM Consultation Report](#). In addition, the revised Assurance Process includes multiple edits made in response to specific suggestions that came through in the public consultation responses but that may not have been reflected in the ERM Consultation Report, as well as from input from the CMSI's Stakeholder and Industry Advisory Groups.

The public consultation feedback on the Assurance Process was generally favourable, but there were various concerns expressed, and recommendations made, that largely related to the independence, perceived or real, of the Assurance Provider vis a vis the Facility. Another consistent comment related to the perceived lack of incentives for Facilities to improve performance. Several changes to the Assurance Process have been made to address both of these issues. Other changes include adjustments to timelines, more specificity regarding the role of National Panels, Assurance Provider qualifications, editorial changes and the addition of an Assurance Plan template in the Appendix.

The public consultation feedback has greatly helped to improve upon the consultation draft, and we are indebted to all stakeholders and rights-holders that provided such considered and thoughtful feedback through the public consultation process

A final consultation on the draft Consolidated Standard, Assurance Process, and Claims Policy will be held between 8 October and 17 November 2025.

## 1.2 Background

The Consolidated Mining Standard Initiative (CMSI) is a collaboration between The Copper Mark, ICMM, Mining Association of Canada (MAC) and World Gold Council (WGC) (i.e. the four Partners) to consolidate our different responsible mining standards into one global standard, overseen by an Independent Board with multi-stakeholder participation.

The vision for the Consolidated Mining Standard Initiative is for a sustainable society, enabled by the responsible production, sourcing, and recycling of metals and minerals. The aim is for the Consolidated Standard to be adopted by a wide range of mining companies – large and small, across all commodities and locations – to drive performance improvement at scale.

The Consolidated Standard combines the best of four existing standards into one comprehensive and practical Standard supported by a robust Assurance Process, reducing complexity in the standards landscape and increasing adoption among companies seeking to follow a credible global benchmark. It establishes clear expectations for responsible practices that span multiple Performance Areas of concern to stakeholders that apply to all producers committed to responsible practices, regardless of size, commodity, or location. The Consolidated Standard will help drive positive outcomes for both people and the environment along individual metals' value chains – from mining to smelting, refining and beyond.

A first round of public consultation on the draft Consolidated Standard, Reporting & Claims Policy, Assurance Process and Governance Model was undertaken between 16 October and 16 December 2024. During that period, a total of eighty-two stakeholders submitted 359 comments on the proposed Assurance Process, including 18 consultancy stakeholders, 17 upstream industry representatives and 11 NGO/CSO stakeholders. Almost half of the comments were focused on Section 4 of the Process which provides an overview of the Consolidated Standard Dispute Resolution Process and public Grievance Mechanism.

The CMSI retained Environmental Resources Management, Inc. (ERM) to develop an online portal to support the public consultation process, analyse feedback received and produce a Consultation Report that presented the feedback from the public consultation process.

### 1.3 Content of the Executive Summary from the Consultation Report

The content of the Executive summary of the ERM Consultation Report related to the Assurance Process is as follows in italics. The highlighted text has been added by the CMSI Partners for the purposes of drawing attention to the main themes that came through the feedback provided:

*There were many comments regarding **the process of identifying, notifying and engaging with stakeholders during the audit process**. The draft Assurance Process requires the Facility to use established communication channels to notify stakeholders and rights-holders about the Assurance Process. Respondents noted this could be seen as potential conflict of interest, and concerns were raised that Facility-led initial notifications with Assurance Providers' direct contact details provided, could deter stakeholder participation due to fears of reprisal. The specific role of Indigenous Peoples was a focus for several respondents who suggested the **engagement process could be better aligned with UNDRIP**.*

*Auditor qualifications and accreditation received numerous comments, including **a lack of clarity on training and/or competency, auditory oversight and selection**. Several respondents stated the Secretariat, and not the Facility, should select the auditor. Accreditation was suggested to be at the enterprise level and not the individual auditor level, with the International Organization for Standardization (ISO) 17021 on conformity assessment being a preferred process. Diversity, equity and inclusion (DEI) training for auditors was also mentioned as being a mandatory component of auditor readiness. There were also **opportunities identified to strengthen the clarity of the role of technical experts**, with terms such as 'demonstrate technical expertise' being too vague.*

*The **audit dispute resolution and grievance mechanisms** were commented on, with the latter focused on **lack of alignment to the UNGPs and its associated focus on remedy**. Comments suggested these processes should be moved to the Governance Model rather than the Assurance Process.*

*Comments on the **level of transparency of the audit process** included the need for more detailed public audit reports and transparency around nonconformity and corrective action. Feedback on the timelines associated with the Assurance Process included ensuring there would be adequate time for notification, reporting and continual improvement planning.*

From this feedback, the CMSI Partners' view is that most aspects of the Assurance Process were well-received during the first public consultation, with a key caveat that the independence of the Assurance Provider from the Facility must be strengthened.

## 2 Detailed feedback from the Consultation Report

### 2.1 Responses to high level general questions

Before going into detailed responses, the ERM Consultation Report outlined the responses to some high-level questions to which stakeholders responded, one of which directly related to the Assurance Process (shaded in blue below). As well, the first question on the ability of the Consolidated Standard to drive performance improvement across the industry (shaded in green below) has a bearing on the Assurance Process, as captured in the detailed comments. Their responses are summarised below in Table 1.

**Table 1: Summary of General Question Responses for all Stakeholder Types**

Question	*	% All Respondents
From your perspective, does the <b>Consolidated Standard system</b> (including Assurance, Governance, Reporting and Claims) <b>meet expectations for driving performance improvement</b> across the industry at a global scale?	+	63
	-	37
Does the <b>scope, content, and narrative style</b> of the Consolidated Standard meet your individual expectations and the <b>collective industry expectation for responsible production practices</b> ?	+	67
	-	33
Do the <b>requirements meet your expectations</b> for being <b>sufficiently clear</b> to support consistent and <b>practical implementation</b> and to achieve necessary performance improvement?	+	56
	-	44
From your perspective, does the <b>three-level performance structure</b> (Foundational, Good, Leading) of the Consolidated Standard meet your expectations for providing an <b>effective on-ramp</b> and clear articulation of good practice and effective path to <b>continuous improvement</b> ?	+	66
	-	34
From your perspective, does the <b>Assurance process</b> meet your expectations of a <b>robust, credible, replicable and transparent approach</b> ?	+	70
	-	30
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?	+	72
	-	28
Does the proposed Governance Model ensure no single group is able to unduly influence decisions?	Yes	31
	No	11

*\*Note: '+' indicates combined Meets Expectations, Exceeds Expectations, and Significantly Exceeds Expectations responses and '-' indicates combined Below Expectations and Significantly Below Expectations responses.*

The key takeaway for the CMSI Partners from Table 1 is that the Assurance Process, with the second highest positive rating, has been generally well-received.

## 2.2 Responses to high-level questions differentiated by stakeholder type

Table 2 provides more detail on the responses to high-level questions from those that responded, differentiated by stakeholder type. One of these questions relates to the Assurance Process (shaded in blue below). This reveals a high-level of alignment with the Assurance Process by the upstream mining industry and consultancies, many of which are Assurance Providers, but more concern from the midstream/downstream mining industry and NGO/CSOs (although slightly less concerned when compared to some of the other questions in Table 2). With respect to the ability of the Consolidated Standard to drive continuous improvement (shaded in green below), the NGO/CSOs do not believe this objective can be achieved, while the remaining stakeholder groups have varying degrees of confidence in the ability of the Consolidated Standard to achieve this objective.

**Table 2: Summary of General Question Responses for Stakeholder Types with 10 or more Question Respondents**

Question	*	% Consultancy	% Midstream/ Downstream Industry	% Upstream Mining Industry	% Industry/ Trade Organisation	% NGO/CSO
Ability of Standard to Improve Performance	+	63	57	92	67	14
	-	38	43	8	33	86
Scope, Content and Narrative of Standard	+	63	89	88	75	26
	-	38	11	12	25	74
Clarity and Applicability of Requirements	+	50	13	81	64	28
	-	50	88	19	36	72
Three-Level Performance Structure	+	63	38	92	64	33
	-	38	63	8	36	67
Assurance Process Approach	+	68	43	96	71	38
	-	32	57	4	29	62
Governance Principles and Model	+	78	71	88	89	35
	-	22	29	12	11	65
Governance Decision-Making**	Yes	21	10	59	21	23
	No	5	10	10	0	23

*\*Note 1: '+' indicates combined Meets Expectations, Exceeds Expectations, and Significantly Exceeds Expectations responses and '-' indicates combined Below Expectations and Significantly Below Expectations responses.*

*\*\*Note 2: Most respondents to this question were undecided*

*Note 3: Please note that the percentages referred to in Table 2 may not equal 100 percent due to rounding.*

The first key takeaway for the CMSI Partners from Table 2 is that the proposed Assurance Process proved largely satisfactory, albeit with some scepticism expressed by the mid to downstream industry and NGOs/CSOs. The

second key takeaway is that there are opportunities to improve how the Assurance Process can help drive performance improvement across the sector.

Further insight is provided in Table 3, which summarises the text responses on whether the Assurance Process meets expectations of a robust, credible, replicable and transparent approach. From stakeholders that responded that expectations were met or exceeded, suggestions were offered for further improvements regarding the importance of training, expertise and certification of Assurance Providers, as well as potential barriers to entry due to costs. For those for whom expectations were not met, comments focused again on training, appropriate subject matter expertise required for effective assurance, the need for more robust public grievance mechanisms and alignment with other standards and accreditation frameworks.

**Table 3: From your perspective, does the Assurance Process meet your expectations of a robust, credible, replicable and transparent approach?**

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	4	2	Excellent, clear Assurance Process with clear Requirements and expectations to set a path for continuous improvement. Assurance provider screening process should be thorough and controlled.
Exceeds expectations	20	6	Assurance Process is comprehensive, replicable, and transparent. Concerns include ambitious external audit and internal review intervals, cost barriers and liability.
Meets expectations	52	12	Assurance Process appears comprehensive, robust, and credible. Concerns relate to training, expertise, and certification of Assurance Providers, documentation, and costs.
Below expectations	27	17	Further clarification and robust Requirements for training and qualification of Assurance Providers needed, including appropriate subject matter expertise. Assurance Process needs more robust public grievance, and reporting processes, clear conformance protocol, and process for dealing with Requirements that are not applicable to Facility.
Significantly below expectations	6	3	Clarity needed for practical application of Assurance Process, citing concerns related to a lack of qualified professions and language on accreditation; provide further Requirements on the Assurance Process and/or align with other industry standards and accreditation frameworks.

Key takeaways for the CMSI Partners derived from Table 3 include the shared concerns across responses related to Assurance Provider training and guidance on accreditation. In general, the Partners believe there are many

opportunities to address these types of concerns through the Assurance Process, as well as by raising the profile of relevant efforts currently underway within Partner organisations.

As an example of the types of training that could be applied to Assurance Providers, the Mining Association of Canada's Towards Sustainable Mining (TSM) and The Copper Mark have collaborated for the past two years on Assurance Providers training for their respective standards, having aligned their Assurance Processes.

The training programme includes but is not limited to:

- Expert-led sessions on soft-skills training such as a human rights-based approach to assurance, interview skills, investigative skills, and professional scepticism.
- Expert-led interactive sessions on providing assurance on key requirements in the standards.
- In-depth sessions on the requirements of the Assurance Process such as assurance engagement planning, stakeholder engagement, and report writing.
- Quarterly calibration calls to address common questions of interpretation and recurring report-writing themes.

This training will evolve to be overseen by the new Consolidated Standard and be adapted as required.

In Table 4, additional insight is provided that relates to the proposed Assurance Process. Key among these include a reiteration of the concern that the CMSI does not incentivise Facilities to improve performance clearly enough to move beyond Towards Good Practice (previously called Foundational level) to Good Practice and Leading Practice Levels.

Table 4: From your perspective, does the consolidated Standard system (including Assurance, Governance, Reporting and Claims) meet expectations for driving performance improvement across the industry at a global scale?

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	2	1	CMSI is a foundational path forward due to a true continuous improvement philosophy and specific, detailed Requirements.
Exceeds expectations	23	6	CMSI will yield tangible benefits by enabling companies to focus on performance, advance resource stewardship, and engagement with outside stakeholders. Comments noted some concerns related to the Claims Policy, adoption by the industry, and additional management or monitoring needs.
Meets expectations	56	15	CMSI framework and intent meets expectations pending improvements shared in the consultation period. Further attention needed on the technical quality of the documents, clarity on timelines for implementation, streamlining executive and Board accountability, embedding sustainability metrics into decision-making, further developing stakeholder engagement frameworks, and examples of quantifiable measures.
Below expectations	33	19	Further clarity and specificity needed across the CMSI. Lack of alignment with international Standards and global applicability of CMSI. Three comments expressed concern that the Towards Good Practice Level (previously called Foundational Practice Level) is not sufficient and/or there should be a zero qualification level. Requests for clarity on specific topics include tailings management, closure, artisanal and small-scale mining (ASM) and large-scale mining (LSM), Environmental, Social and Governance assessments, responsible security management, conflict sensitivity, and respect for international humanitarian law.
Significantly below expectations	14	9	Five comments expressed concern that the CMSI is less stringent than or misaligned with other Standards such as Initiative for Responsible Mining Assurance (IRMA), IFC, UNGPs, Corporate Sustainability Reporting Directive (CSRD), GRI, and OECD guidance, lack of alignment with international laws related to human rights, child labour, and Indigenous Peoples. Some comments noted a lack of incentive for companies to move



			beyond the Good Practice Level and/or that the Towards Good Practice Level Practice Level is insufficient. Two comments expressed that the overall CMSI system gives too much control to the industry, particularly in the Assurance Process and Governance Model.
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Additional insights for the CMSI Partners were derived from Table 4 which summarises text responses to whether the Consolidated Standard system (including Assurance, Governance, Reporting and Claims) meet expectations for driving performance improvement across the industry at a global scale. A significant number of respondents requested further clarity and specificity, especially on timelines, specific technical areas and alignment with other international Standards and regulations.

## 2.3 Responses by section of the Assurance Process Consultation Report from the first public consultation

As a reminder, 359 comments on the Assurance Process were received from eighty-two stakeholders, including 18 consultancy stakeholders, 17 upstream industry representatives and 11 NGO/CSO stakeholders. Approximately 48 percent of the comments were submitted on Section 4, Consolidated Standard External Assurance Process, while as few as 6 comments were submitted on Section 5, Dispute Resolution Process.

The top 5 stakeholder groups providing comments on the Assurance Process are summarised in Table 5 (taken directly from the ERM Consultation Report). This shows the numbers of comments received from consultancies, NGOs/CSOs, the upstream mining industry, Indigenous Peoples organisations, and industry/trade organisations. The upstream mining industry accounted for the largest percentage of comments on the Assurance Process – over 37% -- followed by NGOs/CSOs at just over 16% and consultancies at 13%.

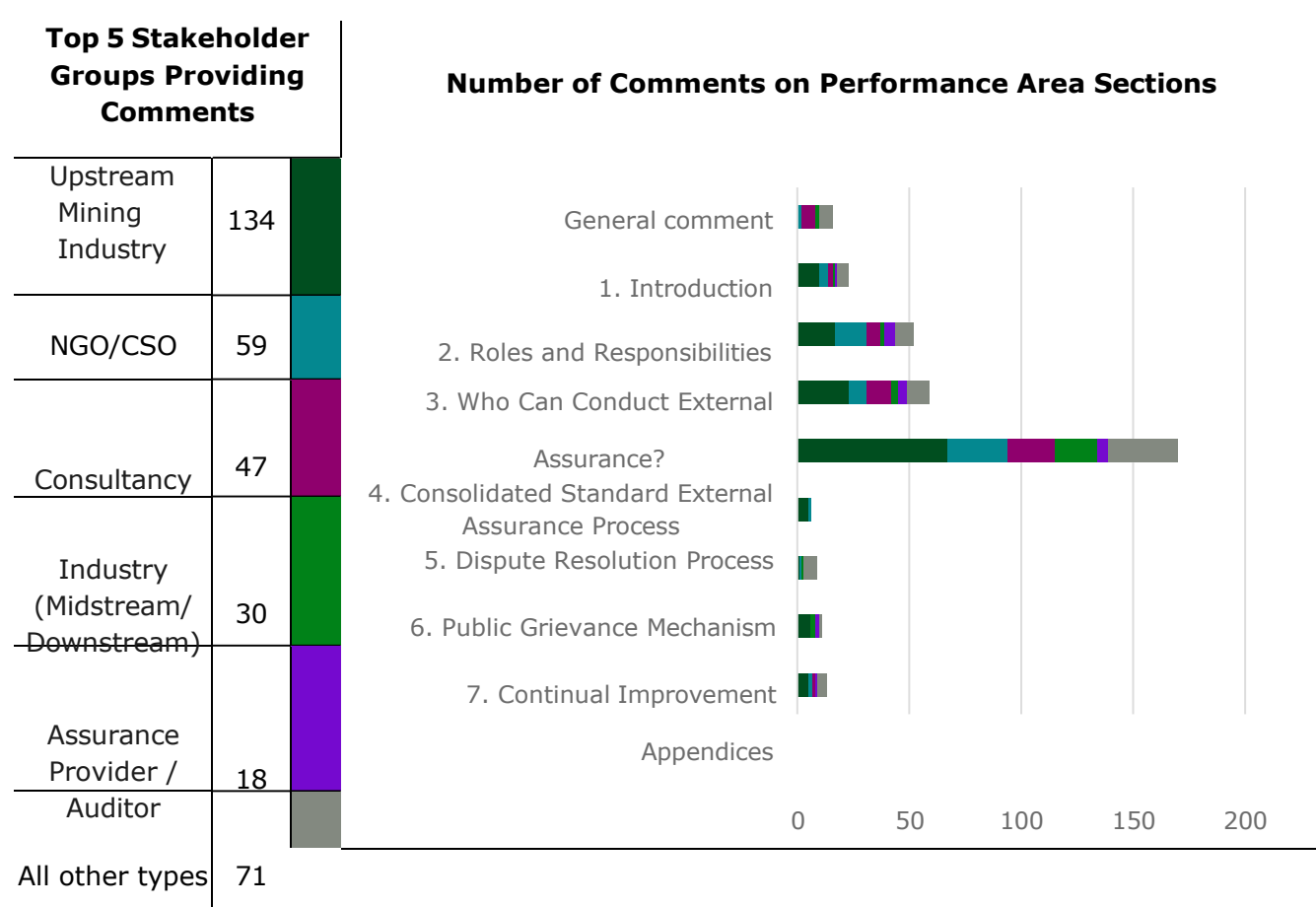
These responses are mapped to the 8 sections of the Assurance Process consultation draft (including Appendices), disaggregated by stakeholder group. This provides information on which sections attracted the most comments and from which groups. Section 4 (Consolidated Standard External Assurance Process) attracted by far the largest number of comments, followed by Section 3 (Who Can Conduct an External Assurance) and Section 2 (Roles and Responsibilities).

The ERM Consultation Report summarised the overall feedback on the Assurance Process as follows:

- *There was a concern regarding the process of identifying, notifying and engaging with stakeholders during the audit process. The process currently states the Facility will identify and notify the stakeholder groups. This was seen as a potential conflict of interest and may create reluctance on the part of stakeholders to participate for fear of reprisal. The specific role of Indigenous Peoples was a focus for several respondents who felt the engagement process did not align with UNDRIP.*
- *Auditor qualifications and accreditation received numerous comments. This included lack of clarity on training versus competency, auditor oversight and selection. Several respondents stated the Secretariat and not the Facility should be selecting the auditor. Accreditation was suggested to be at the enterprise level and not the individual auditor level, with ISO 17021 being a preferred process. DEI training for auditors was also mentioned, and the role of technical experts was felt to lack clarity, with terms such as 'demonstrate technical expertise' being too vague.*

- The dispute resolution and grievance mechanisms were commented on, with the latter focused on lack of alignment to the UNGPs and its associated focus on remedy. A number of comments identified these processes should be moved to the Governance Model rather than the audit procedure.
- The level of transparency of the audit process was also commented on, which included the need for more detailed public audit reports and transparency around nonconformity and corrective action.
- The role of National Panels in assurance was identified as being not well defined.
- There were comments on the timelines associated with the Assurance Process, ensuring there would be adequate time for notification, reporting and continual improvement planning.

Table 5: Feedback on the Assurance Process from Top 5 Stakeholder Groups



These specific points of concern come though more clearly in the detailed feedback outlined in the ERM Consultation Report. While the ERM Consultation Report captures a range of comments and recommendations on the Assurance Process, the Partners also felt two dominant themes emerged that relate to the perceived lack of independence of the Assurance Provider, and the lack of clear incentives for Facilities to improve their performance over time. Regarding the first issue, two general recommendations were put forward: 1) to establish an arms-length process for the hiring of Assurance Providers and, 2) a range of changes to more clearly demonstrate that an Assurance Provider conducts an assessment free of influence by the Facility. The Partners have not accepted the first recommendation as it is inconsistent with the practice of other standards and would

be administratively burdensome, however many changes have been made to the Assurance Process to clearly strengthen the independence of the Assurance Provider from influence by the Facility.

Regarding concerns about whether the Consolidated Standard would drive performance improvement over time, the Partners have made changes to both the Assurance Process and the Claims Policy (previously called the Reporting and Claims Policy) to strengthen requirements for Facilities to improve performance over time. This includes the ability to remove a Facility from the Assurance Process if there is continued failure to improve performance from one assurance cycle to the next.

The Partners would also note that Towards Sustainable Mining (TSM) has had a long track record of demonstrating continual improvement with its similar benchmarking system of 5 levels of performance. Similarly, The Copper Mark has demonstrated improvement within its participants as evidenced in follow up assessment and re-assessment reports using a similar Assurance Process and claims system. Industry bodies, such as ICMM, World Gold Council (WGC) and Mining Association of Canada (MAC), may also set member expectations for continual improvement.

The next section includes a tabular summary of the detailed feedback from the ERM Consultation Report, coupled with the response from the CMSI Partners on how Partners have responded to that feedback.

### 3 CMSI Partners response to the detailed feedback

The CMSI Partners' responses to the detailed feedback are provided in Table 6. The first two columns are taken from pages 142-144 of the ERM Consultation Report, which summarised the detailed feedback from stakeholders in each of the 8 sections (including Appendices) of the Assurance Process that was publicly consulted on. The third column provides the response of the CMSI Partners, which is reflected in the revised Assurance Process, as appropriate.

Feedback in Table 6 has been noted and responded to within the section where it was submitted. This may not directly align with the relevant section(s) of the Assurance Process to which the feedback refers or where changes have been made.

As noted in the preamble, we have attempted to faithfully respond to the points as summarised within the ERM Consultation Report. In addition, the revised Assurance Process includes multiple other edits made in response to specific suggestions that came through in the public consultation responses, which have greatly helped to improve upon the original draft. We are indebted to the stakeholders that provided feedback through the public consultation process. We are also deeply indebted to the members of the Stakeholder and Industry Advisory Groups, whose input and advice has been invaluable.

Lastly, we encourage all stakeholders and rights-holders with an interest in the Assurance Process to participate in the second and final round of public consultation.

Table 6: Detailed consultation feedback and CMSI Partner responses

All Sections	Consultation feedback	CMSI Partner responses
1. Introduction	<ul style="list-style-type: none"> <li>Incorrect reference to ISO 19011;</li> </ul>	<ul style="list-style-type: none"> <li>The list of recognised training credentials in Appendix A (List of Recognised Assurance Provider Training Credentials) has been updated to clarify reference between CQI Lead Auditor course ISO 9001 and ISO 19011 auditing guidance document.</li> </ul>
	<ul style="list-style-type: none"> <li>Clarify use of terms, certification versus assurance;</li> </ul>	<ul style="list-style-type: none"> <li>Reference to ‘certification’ has been removed throughout the document to avoid confusion. The Secretariat will not be a certification body.</li> <li>The terms ‘auditor’ and ‘audit’ have been replaced by ‘Assurance Provider’ and ‘Assurance Process’ throughout the document, except within Appendix A (List of Recognised Assurance Provider Training Credentials) where it appears within the formal names of certifications or training courses.</li> </ul>
	<ul style="list-style-type: none"> <li>How are multi-site facilities managed? Clarify company versus facility audits;</li> </ul>	<ul style="list-style-type: none"> <li>Each Facility is assured independently under the Assurance Process. While corporate-level requirements may be assessed once and reused across multiple Facilities, all Facilities must undergo their own full assurance cycle every three years. This approach ensures performance is verified at Facility level, addressing contextual risks that may vary between locations.</li> </ul>
	<ul style="list-style-type: none"> <li>Perception that when the company compensates the auditors, they are compromised;</li> </ul>	<ul style="list-style-type: none"> <li>A role has been added to the Secretariat to assess for potential conflicts of interest of an Assurance Provider and a Facility. Should the Secretariat determine conflict exists, then an Assurance Provider would not be permitted to conduct the assurance.</li> </ul>
	<ul style="list-style-type: none"> <li>Audit public report lacks sufficient details. Audit reports need to focus on details and not summaries at Performance Area and Performance Level;</li> </ul>	<ul style="list-style-type: none"> <li>Additional guidance on the statement of findings has been added to Section 4.5 (Reporting), including clarification to indicate at requirement level, the Assurance Provider should detail any gaps or opportunities that exist that enable the Facility</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
	<ul style="list-style-type: none"> <li>System lacks adequate accreditation – consider ISO 17021;</li> <li>Need clarity on number of audit days; and</li> <li>Rather than assign conformance to the lowest level of performance where all requirements have been met, there can be minor or major nonconformance to a higher level of performance with corrective action requests.</li> </ul>	<p>to meet Good Practice Level.</p> <ul style="list-style-type: none"> <li>While not a requirement, <i>ISO 17021 – Conformity Assessment- Requirements for bodies providing audit and certification of management systems</i>, is identified in the Assurance Process as being helpful for an Assurance Provider’s legal business entity to have a means of demonstrating that processes are in place to manage conflict of interest, document control and ability to receive and address grievances.</li> <li>There is not intended to be a specified number of assurance days as the scope is determined by the applicable Performance Areas and will take as long as necessary to ensure that each applicable Performance Area is assured according to the expectations of the Assurance Process. A revised timeline has been included in the Assurance Process under Appendix C (Table of Activities and Deadlines for Facilities).</li> <li>The current system has been designed to specifically avoid the subjectivity of major and minor nonconformances. With the level of detail contained in the requirements and the multiple levels of performance, which set out clear paths for continuous improvement, the current design is deemed to be appropriate.</li> </ul> <p>Note: As the bullet points above do not directly relate to the Introduction section of the Assurance Process document per se, no changes have been made to this section.</p>

All Sections	Consultation feedback	CMSI Partner responses
2. Roles and Responsibilities	<ul style="list-style-type: none"> <li>Decision-making authority unclear;</li> <li>Concern with the mine identifying the stakeholders and rights holders and providing the auditors with a list;</li> </ul>	<ul style="list-style-type: none"> <li>Language in the Assurance Process has been revised to more clearly articulate the decision making authority and better demonstrate the independence of the Assurance Provider from the Facility. For example, while the Facility has the responsibility to provide a list of stakeholders and rights-holders to the Assurance Provider, the latter are expected to use their professional judgement and conduct additional research to adjust, as necessary, and ensure inclusion of vulnerable groups. The Assurance Provider is also responsible for ensuring interviews are conducted in a safe space and that anonymity is provided unless otherwise agreed to by the interviewee.</li> </ul>
	<ul style="list-style-type: none"> <li>Role in dispute resolution unclear;</li> </ul>	<ul style="list-style-type: none"> <li>Section 5 (Dispute Resolution Process) of the Assurance Process clearly defines respective roles of parties in the dispute resolution</li> </ul>
	<ul style="list-style-type: none"> <li>Unclear timelines, using 'as soon as';</li> </ul>	<ul style="list-style-type: none"> <li>Timelines in the revised Assurance Process have been clearly defined.</li> </ul>
	<ul style="list-style-type: none"> <li>Secretariat needs to be involved in media scan;</li> </ul>	<ul style="list-style-type: none"> <li>As outlined in Section 2C (Roles and Responsibilities – The Secretariat) and Section 4 (Consolidated Standard External Assurance Process), it is the Secretariat that conducts due diligence on business risks and a media scan of the Facility undergoing assurance, and provides these to the Assurance Provider.</li> </ul>
	<ul style="list-style-type: none"> <li>Need better definition of role of national panels;</li> </ul>	<ul style="list-style-type: none"> <li>Additional detail on the potential contribution of guidance by National Panels to the Assurance Process has been provided, as well as a stipulation that such guidance must be approved by the Board of the Consolidated Standard and published on the Consolidated Standard's website.</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
	<ul style="list-style-type: none"> <li>Need clarity on definition of operational control. What about contracted operations?;</li> </ul>	<ul style="list-style-type: none"> <li>The definition of operational control has been added to the 'Facility' definition in the Glossary of the revised Consolidated Standard.</li> </ul>
	<ul style="list-style-type: none"> <li>Provide DEI training to auditors. Ensure data are gender disaggregated; and</li> </ul>	<ul style="list-style-type: none"> <li>Further consideration will be given to DEI training for Assurance Providers as training packages are developed.</li> <li>Gender disaggregated data would be dealt with under reporting requirements in the Consolidated Standard.</li> </ul>
	<ul style="list-style-type: none"> <li>Concept of National Panels does not address multi-jurisdictional supply chains; suggest jurisdictional panels.</li> </ul>	<ul style="list-style-type: none"> <li>Facilities can implement the Consolidated Standard when operating in countries that have no National Panel. It would be challenging to convene and resource multi-jurisdictional panels, unless there was an overarching legal framework applying to a number of countries (e.g. the European Union).</li> </ul>
3. Who Can Conduct External Assurance?	<ul style="list-style-type: none"> <li>More guidance on auditor qualifications;</li> <li>Suggesting independent management of accreditation and auditor selection / qualification;</li> </ul>	<ul style="list-style-type: none"> <li>Section 3.1.1 (Assurance Provider Qualifications) includes a detailed set of qualifications that Assurance Providers must meet including a requirement to hold at least one of the training credentials as defined in Appendix A (List of Recognised Assurance Provider Training Credentials) and minimum levels of experience, as well as subject matter expertise, requirements for independence, cultural and language competencies, and minimum education requirements. Given this comprehensive list of qualifications, no further additions were made.</li> </ul>
	<ul style="list-style-type: none"> <li>Technical disciplines – there is no one person who can cover all topics. Tailings expertise is a small pool, so this needs to be considered in audit team selection;</li> <li>Demonstrate technical expertise' is a vague Requirement;</li> <li>Should be an auditor competency test;</li> </ul>	<ul style="list-style-type: none"> <li>Additional language has been added to describe the role of subject matter experts in the Assurance Process, in Section 3 (Who Can Conduct External Assurance).</li> <li>Language has been added to specify that all Assurance Providers must undergo regular training and competency exams provided by the Secretariat.</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
	<ul style="list-style-type: none"> <li>Need to emphasise subject matter expertise, not just auditor qualifications;</li> </ul>	
	<ul style="list-style-type: none"> <li>Clarify how auditors are disqualified. Inadequate safeguards against auditor conflicts of interest; and</li> <li>Need clarity on rotation of auditors and timeframes.</li> </ul>	<ul style="list-style-type: none"> <li>The Secretariat may remove the status of an ‘approved’ Assurance Provider in the event of a reported grievance against the provider that is of a nature to warrant this.</li> <li>A role has been added for the Secretariat to assess potential conflicts of interest of an Assurance Provider and a Facility. Should the Secretariat determine conflicts exist, then an Assurance Provider would not be permitted to conduct the assurance.</li> <li>A requirement to rotate Assurance Providers was already included in the proposed Assurance Process, stipulating that <i>“After the third assurance cycle, the Facility must select a different team of approved Assurance Providers, whether from the same company or a different company.”</i></li> </ul>
4. Consolidated Standard External Assurance Process	<ul style="list-style-type: none"> <li>Will stakeholder lists be published?;</li> </ul>	<ul style="list-style-type: none"> <li>The Assurance Report will include the number and type of stakeholders interviewed. This will not include the identity of the individuals.</li> </ul>
	<ul style="list-style-type: none"> <li>Recommend following AA1000;</li> </ul>	<ul style="list-style-type: none"> <li>The Assurance Process lists ISO19011 and ISAE 3000 in Section 4.1 (Methodology) as two examples of recognised standard assurance methodologies, but also allows for equivalent methodologies to be employed.</li> </ul>
	<ul style="list-style-type: none"> <li>What is meant by ‘sufficient number of Indigenous rights holders’?;</li> </ul>	<ul style="list-style-type: none"> <li>Where there are Indigenous rights-holders identified, the Assurance Provider must be confident that there is a sufficient number of Indigenous rights-holders included in the list to appropriately inform the Assurance Provider’s assessment.</li> </ul>
	<ul style="list-style-type: none"> <li>Clarification on whether assurance level is higher for Leading Practice claims;</li> </ul>	<ul style="list-style-type: none"> <li>The same Assurance Process is applied to all Performance Levels.</li> </ul>
	<ul style="list-style-type: none"> <li>How will corporate performance be assessed?;</li> </ul>	<ul style="list-style-type: none"> <li>A new Section 4.2.8.3 (Assessing Corporate Requirements) has</li> </ul>



All Sections	Consultation feedback	CMSI Partner responses
		been added on how corporate requirements are to be assured, particularly when the company involved has multiple Facilities.
	<ul style="list-style-type: none"> <li>Are media scans to be shared with the company? Who pays for this?;</li> </ul>	<ul style="list-style-type: none"> <li>As outlined in Section 4 (Consolidated Standard External Assurance Process), it is the Secretariat that conducts, pays for and shares a media scan of the Facility undergoing assurance with the Assurance Provider.</li> </ul>
	<ul style="list-style-type: none"> <li>CAR within 30 days of final report leaves insufficient time. Suggest 90 days;</li> </ul>	<ul style="list-style-type: none"> <li>The Partners believe that 30 days for immediate corrective actions is sufficient, in particular with the ability to implement medium corrective actions provided.</li> <li>The time for medium term corrective action has been extended from 9 to 12 months after receipt of the final Assurance Report by the Facility.</li> </ul>
	<ul style="list-style-type: none"> <li>No remote audits could be an issue;</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.2.10 (Site Visits) addresses the approach to remote assurance engagements.</li> </ul>
	<ul style="list-style-type: none"> <li>Who chooses the auditor, the site or the Secretariat?;</li> </ul>	<ul style="list-style-type: none"> <li>Assurance Providers are selected by the Facility, as outlined in Section 4.2.5 (Assurance Provider Selection). While this has remained consistent, there have been significant revisions throughout the document to remove elements that appeared to provide the Facility with undue influence over the Assurance Provider throughout the Assurance Process.</li> </ul>
	<ul style="list-style-type: none"> <li>30 days' notice of audit not enough;</li> </ul>	<ul style="list-style-type: none"> <li>The advance notice period for the Assurance Process has been increased from 30 days to 45 days. The Assurance Provider may also have the discretion to issue the notice in lieu of the Facility, which may be important in low trust environments. The Assurance Provider is required to provide a summary of the key points from each interview in writing (or a verbal summary if requested) and must provide a reasonable amount of time for the interviewee to provide feedback or make observations about the contents or accuracy of the summary before the Assurance</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
	<ul style="list-style-type: none"> <li>No apparent incentive to achieve a higher Performance Level. How will you enforce achievement of Good Practice over time? What are the consequences of noncompliance? Recommend a mandatory 2-year period to achieve Good Practice Level;</li> </ul>	<p>Report is finalised.</p> <ul style="list-style-type: none"> <li>Any Facility that participates in the Assurance Process commits to reach Good Practice Level over time and to show meaningful progress towards this objective. The Secretariat will engage with a Facility that fails to demonstrate improved performance over two consecutive assurance cycles to discuss their commitment to the Standard. Continued failure to improve performance may lead to the Facility being ineligible to participate in the Standard.</li> <li>Facilities that have met the Good Practice Level and achieved a Performance Claim are encouraged but not required to publish a continual improvement plan for achieving Leading Practice Level.</li> </ul>
	<ul style="list-style-type: none"> <li>Concept of risk-based audits is unclear and conflicts with UNGPs;</li> </ul>	<ul style="list-style-type: none"> <li>The revised Assurance Process includes significantly expanded guidance on the risk-based methodology (Section 4.2.8.2 - Defining the Risk-Based Parameters of the Assurance Process), ensuring all applicable requirements are reviewed, with additional depth applied to those Performance Areas posing the greatest risk to people or the environment. This aligns with the UNGPs' expectations for risk-based human rights due diligence. The revised process reinforces safeguards for stakeholder engagement, independence, and transparency in assurance planning and execution.</li> </ul>
	<ul style="list-style-type: none"> <li>Annual update of self-assessment creates more work than needed. Facilities should define their update cycle;</li> </ul>	<ul style="list-style-type: none"> <li>The Partners believe that annual self-assessments help to ensure Facilities maintain levels of performance and help drive continuous improvement.</li> </ul>
	<ul style="list-style-type: none"> <li>Stipulate that when interpreters are used that they must be independent of the facility;</li> </ul>	<ul style="list-style-type: none"> <li>Clarification has been added regarding the use of interpreters and the participation of observers to the Assurance Process. Assurance Providers may use interpreters, but these must be independent of the Facility, and their names and affiliations must be included in the Assurance Report.</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
	<ul style="list-style-type: none"> <li>Indigenous Peoples' engagement not aligned with UNDRIP and ILO Convention 169. Decision-making processes not clear;</li> <li>The proposed Assurance Process provides the Facility with disproportionate control and influence over the process which may compromise the capture of information on impacts on Indigenous Peoples, and pose a danger to affected Indigenous communities. The Facility largely informs the scope of engagement with affected Indigenous Peoples. The facility's outreach role and the lack of a comprehensive approach to safeguard Indigenous Peoples pose safety concerns and limits the integrity of the Assurance Process. The Facility's ability to choose the Assurance Provider, given the influence it may exert over such Assurance Provider, is concerning and risks compromising the credibility of the Standard. This would be better safeguarded if affected Indigenous Peoples, workers, and other stakeholders/rights holders nominated and selected Assurance Providers, which would increase the standards' trust and accountability and also provide a more equitable decision-making structure; and</li> </ul>	<ul style="list-style-type: none"> <li>Changes have been made to the Assurance Process to ensure meaningful engagement of Indigenous Peoples. The revised Assurance Process is designed to address these issues by requiring the Assurance Provider to retain ultimate discretion over the selection of interviewees, to critically assess and supplement Facility-provided lists with independent research, and to ensure Indigenous rights-holders are included where identified. The Assurance Provider must use their own discretion to determine whether and how to take any context provided by the Facility into account and not let undue influence determine the selection of interviewees or the approach. National Panels, where they exist, may also be consulted to provide advice on potential individuals or groups of interest prior to the interview process (e.g. NGOs, Indigenous communities). Ultimately, the process outlines that the Assurance Provider should feel confident that they have been able to select interviewees on an informed, independent basis free of bias or influence by the Facility. Interviews must also be conducted independently, without Facility oversight, to safeguard confidentiality and mitigate undue influence. These provisions are intended to ensure that Indigenous perspectives and other rights-holders' voices are meaningfully incorporated while maintaining the independence and integrity of the Assurance Process.</li> </ul>
	<ul style="list-style-type: none"> <li>Recommendation that the perspectives of people that may be vulnerable (women, etc) for each identified rights holder group should be gathered, as impacts are felt differently by vulnerable groups and non-vulnerable groups.</li> </ul>	<ul style="list-style-type: none"> <li>As detailed in Section 4.2.12 (Worker Interviews), Assurance Providers are expected to develop a representative sampling plan for worker interviews that takes gender perspectives into consideration. When selecting the sample for both worker and stakeholder/rights-holder interviews, the Assurance Provider must take an inclusive approach that includes women and those who may be vulnerable.</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
5. Dispute Resolution Process	<ul style="list-style-type: none"> <li>Does this reference a subcommittee of the Board? Not in the Governance Model.</li> </ul>	<ul style="list-style-type: none"> <li>It is envisaged that the sub-committee will be established by the Board once the Consolidated Standard is operational.</li> <li>A footnote has been added in Section 5.2 (Stage 2: Sub-Committee of the Board of Directors) to stipulate that this sub-committee should include balanced representation across the Board's four groups and avoid any conflicts of interest.</li> </ul>
6. Public Grievance Mechanism	<ul style="list-style-type: none"> <li>Will multiple languages be supported?;</li> </ul>	<ul style="list-style-type: none"> <li>The Grievance Mechanism will build on the existing grievance mechanism of The Copper Mark. The existing version includes phone lines in Chile, China, France, Republic of South Korea, Peru and the United Kingdom with ability to report a complaint in local language. These geographies can be expanded in accordance with the geographical footprint of Facilities participating in the Consolidated Standard Assurance Process. The Grievance Mechanism document is currently available in English and French.</li> </ul>
	<ul style="list-style-type: none"> <li>This should be in the governance document, not assurance;</li> </ul>	<ul style="list-style-type: none"> <li>The Grievance Mechanism appears in the Assurance Process as it relates to the process, conduct and results of the assurance.</li> </ul>
	<ul style="list-style-type: none"> <li>Should be UNGP-aligned;</li> </ul>	<ul style="list-style-type: none"> <li>The Assurance Process, including the Grievance Mechanism, has been reviewed independently for UNGP-alignment and revised to include recommendations from those reviews. The Grievance Mechanism includes a commitment to regularly review effectiveness and alignment with the UNGPs.</li> </ul>
	<ul style="list-style-type: none"> <li>Concerns were raised about the effectiveness and timeliness of grievance mechanisms, particularly the risk of prolonged processes disadvantaging Indigenous Peoples. The Assurance Process should define clear timelines for Facilities to respond, progress and conclude grievances; and</li> </ul>	<ul style="list-style-type: none"> <li>Timelines for acknowledgement of receipt of a grievance (10 days), and a target of 120 days for a response have been added.</li> </ul>

All Sections	Consultation feedback	CMSI Partner responses
	<ul style="list-style-type: none"> <li>Suggestion to clarify language protecting the complainant and/or whistleblower.</li> </ul>	<ul style="list-style-type: none"> <li>Additional language has been added to reinforce protections for complainants from fear of intimidation or reprisals.</li> </ul>
7. Continual Improvement	<ul style="list-style-type: none"> <li>Should not continual improvement plans be required for all facilities falling short of Good Practice?; and</li> <li>Unclear how this is planned.</li> </ul>	<ul style="list-style-type: none"> <li>As stipulated in Section 4.6 (Continual Improvement Plan), improvement plans are required for Facilities that have not achieved Good Practice Level in all applicable Performance Areas.</li> </ul>
Appendices	<ul style="list-style-type: none"> <li>Reliance on ISO auditors will not address cultural uniqueness;</li> </ul>	<ul style="list-style-type: none"> <li>See comments above regarding the expectation that assurance will be undertaken by a team of professionals bringing skillsets such as subject matter expertise and local knowledge to collectively meet all the requirements contained in the Assurance Process.</li> </ul>
	<ul style="list-style-type: none"> <li>How will you address geopolitical situations preventing audit agencies from operating in certain areas?;</li> </ul>	<ul style="list-style-type: none"> <li>Section 4.2.10 (Site Visits) has provisions for exceptional circumstances, such as a global pandemic or security concerns, where a remote assessment may be considered for a Facility. Remote assessment requests are made by the Assurance Provider and approved by the Secretariat.</li> </ul>
	<ul style="list-style-type: none"> <li>Consider adding Exemplar Global and International Register of Certificated Auditors lead auditor training; and</li> </ul>	<ul style="list-style-type: none"> <li>The specific credentials have not been listed, however Appendix A (List of Recognised Assurance Provider Training Credentials) allows for other credentials to be deemed equivalent to those listed.</li> </ul>
	<ul style="list-style-type: none"> <li>Inadequate detail in reporting exacerbates vagueness within the Consolidated Standard.</li> </ul>	<ul style="list-style-type: none"> <li>A revised reporting template, accompanied by an Assurance Plan template, has been provided for second public consultation.</li> <li>The revised reporting template has been updated to include updated PAs, as well as some minor editorial changes. Post final consultation, further adjustments will be made to the template to account for the different levels of reporting, including aggregate scores.</li> </ul>

## Consolidated Mining Standard Initiative

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