

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

Brazil

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

Anonymous

## COMMENTS & QUESTIONS BY DOCUMENT

### QUESTION 1

**Overall does the revised version of the Consolidated Standard system (including Standard, Assurance Process, Governance Model\* and Claims Policy) meet your expectations for improvement relative to the original public consultation version?**

Response: 4: Exceeds expectations

### QUESTION 2

**From your perspective, does the updated Consolidated Standard system, including Standard, Assurance Process, Governance Model\* and Claims Policy meet expectations for driving performance improvement across the industry at a global scale?**

Response: 4: Exceeds expectations

Document:  
Assurance

## 3. Who Can Conduct External Assurance?

SECTION: 3.1 Assurance Provider Requirements

COMMENT:

*A exigência de auditores aprovados e independentes é positiva, mas pode haver dificuldade em encontrar profissionais qualificados em alguns países. Sugestão: ampliar rede de treinamento regional.*

TRANSLATION:

*The requirement for [having] approved and independent auditors is positive, but it may be difficult to find qualified professionals in some countries. Suggestion: Expand the regional training network.*

## 4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.13 External Stakeholder and Rights

COMMENT:

*Muito relevante a inclusão de entrevistas com trabalhadores, comunidades e povos indígenas. Isso fortalece a credibilidade.*

TRANSLATION:

*The inclusion of interviews with workers, communities, and indigenous peoples is very pertinent. This strengthens credibility.*

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## General Comment

COMMENT:

*O processo é robusto e transparente. Entretanto, o volume de etapas e relatórios pode ser complexo para empresas menores.*

TRANSLATION:

*The process is robust and transparent. However, the [high] volume of steps and reports can be complex for smaller companies.*

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QUESTION 1

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

Response: 4: Exceeds expectations

O processo é robusto e transparente. Entretanto, o volume de etapas e relatórios pode ser complexo para empresas menores. Muito relevante a inclusão de entrevistas com trabalhadores, comunidades e povos indígenas. Isso fortalece a credibilidade.

A exigência de auditores aprovados e independentes é positiva, mas pode haver dificuldade em encontrar profissionais qualificados em alguns países. Sugestão: Estabelecer prazos máximos de resposta para correção de não conformidades, garantindo comparabilidade entre auditorias.

The process is robust and transparent. However, the [high] volume of steps and reports can be complex for smaller companies. The inclusion of interviews with workers, communities, and indigenous peoples is very pertinent. This strengthens credibility.

The requirement for [having] approved and independent auditors is positive, but it may be difficult to find qualified professionals in some countries. Suggestion: Establish maximum response times to correct non-conformities, ensuring comparability between audits.

Document:  
Standard

## Introduction

SECTION: General Comment

COMMENT:

*O documento é abrangente, mas em alguns trechos técnico-jurídicos pode dificultar o entendimento para comunidades locais e pequenas empresas. Sugestão: preparar guias de implementação simplificados.*

TRANSLATION:

*The document is comprehensive, but some technical and legal sections may be difficult for local communities and small companies to understand. Suggestion: Prepare simplified implementation guides.*

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### **Performance Area 01: Corporate Requirements**

COMMENT:

*Os requisitos são ambiciosos e adequados para grandes empresas, mas podem ser desafiadores para minas de pequeno e médio porte. Recomenda-se escalonamento de exigências.*

TRANSLATION:

*The requirements are ambitious and appropriate for large companies, but may be challenging for small- and medium-sized mines. It is recommended that the requirements be phased in.*

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### **Performance Area 05: Human Rights**

COMMENT:

*Abrange bem direitos humanos, clima, rejeitos e comunidades. Talvez reforçar mais a questão de rastreamento na cadeia de suprimentos downstream.*

TRANSLATION:

*It covers human rights, climate, waste, and communities well. Perhaps reinforce the issue of tracking in the downstream supply chain.*

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### **Performance Area 23: Circular Economy**

COMMENT:

*Está bem alinhado a ICMM, TSM e padrões OCDE.*

TRANSLATION:

*It is well aligned with the ICMM, TSM, and OCDE standards.*

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QUESTION 1

**Does the scope, content, and narrative style of the consolidated standard meet your individual expectations for responsible production practices?**

Response: 4: Exceeds 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 (Towards Good Practice, Good Practice, Leading Practice) 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

## 2. General Requirements for all Consolidated Standard Claims

SECTION: General Comment

COMMENT:

*O texto é direto, mas alguns termos (como “Reivindicação Assegurada” e “Reivindicação de Desempenho”) podem confundir. Sugestão: simplificar nomenclaturas ou sempre apresentar exemplos práticos.*

TRANSLATION:

*The text is straightforward, but some of the terms (such as “Assured Claims” and “Performance Claims”) can be confusing. Suggestion: Simplify nomenclature or always provide practical examples.*

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COMMENT:

*Essencial para evitar alegações enganosas. Está bem estruturada. Segue claramente o Guia da ISEAL.*

*Sugestão: Criar materiais de comunicação padrão (templates de release, exemplos de postagens) para reduzir risco de mau uso por parte das empresas.*

TRANSLATION:

*[It is] essential to avoid misleading claims. It is well structured. It clearly follows the ISEAL Guide. Suggestion: Create standard communication materials ([press] release templates, sample posts) so as to reduce the risk of misuse by companies.*

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### QUESTION 1

**Does the level of transparency provided by the Claims Policy (i.e. through disclosing scores for each Performance Area, aggregated scores to indicate overall progress towards Good Practice, and Performance Claims) meet your expectations to incentivise continuous performance improvement?**

Response: 4: Exceeds expectations

A Política é essencial para evitar alegações enganosas. Está bem estruturada. Segue claramente o Guia da ISEAL.

O texto é direto, mas alguns termos (como “Reivindicação Assegurada” e “Reivindicação de Desempenho”) podem confundir. Sugestão: simplificar nomenclaturas ou sempre apresentar exemplos práticos, criar materiais de comunicação padrão (templates de release, exemplos de postagens) para reduzir risco de mau uso por parte das empresas.

The Policy is essential to avoid misleading claims. It is well structured. It clearly follows the ISEAL Guide.

The text is straightforward, but some of the terms (such as “Assured Claims” and “Performance Claims”) can be confusing. Suggestion: Simplify nomenclatures or always provide practical examples, create standard communication materials ([press] release templates, sample posts) so as to reduce the risk of misuse by companies.