

CMSI Consultation Response

Respondent Details

NAME

Elvis Okyere

COUNTRY

Ghana

PERMISSION

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

STAKEHOLDER

Affected communities

ORGANISATION

Graduate NSS trainee

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

4,The revised Consolidated Standard system demonstrates a significant improvement in clarity, structure, and inclusiveness compared to the earlier version. The alignment across Standard, Assurance Process, and Claims Policy provides a unified framework that strengthens accountability and supports responsible mining practices at both the corporate and operational levels.

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: 5: Significantly exceeds

5,The updated system provides a strong global benchmark that promotes continuous improvement across the mining industry. By combining multiple established standards under one harmonized framework, it ensures greater consistency, transparency, and measurable progress toward sustainable and ethical mining worldwide.

Document:
Assurance

2. Roles and Responsibilities

SECTION: A. Facilities and their Parent Companies, Level not required

COMMENT:

Specific Comment -Roles and Responsibilities (Facilities and Their Parent Companies)

The Assurance Process outlines strong responsibilities for facilities to prepare evidence, conduct self-assessments, and engage with stakeholders.

However, it could be strengthened by requiring facilities to also assess and verify the responsible performance of their key suppliers and contractors, particularly in regions like West Africa where procurement and contracting form a large part of mining operations.

Including clear expectations on supplier sustainability assessments, ethical sourcing, and local supplier engagement within the Assurance Process will help ensure that responsible practices extend beyond the mine site into the broader supply chain.

Recommendation: Add a clause under Facility responsibilities that requires the integration of Responsible Supply Chain Management and third-party risk assessments into the assurance preparation phase.

4. Consolidated Standard External Assurance Process

SECTION: General Comment

COMMENT:

General Comment -Assurance Process Overview

The Assurance Process is detailed and provides a solid foundation for transparency and accountability.

However, implementation could be challenging for mid-sized mining companies and facilities in developing economies due to resource limitations and varying levels of technical expertise.

I suggest CMSI consider:

Providing training or regional workshops for African facilities and local assurance providers;

Allowing a phased implementation approach (e.g., capacity-building year followed by full assurance); and

Encouraging collaboration between international assurance providers and national panels to build local auditing capacity.

This approach would improve inclusivity, build regional competence, and make the standard practical for adoption across developing mining regions like Ghana.

QUESTION 1

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

Response: 4: Exceeds expectations

4,The Assurance Process demonstrates a well-structured and transparent approach that promotes credibility and accountability across participating mining organizations. The alignment with international assurance standards and inclusion of independent review mechanisms make it both replicable and robust for consistent global application.

Document:
Standard

General comment on Performance Area

COMMENT:

General Comment -All Performance Areas

The Performance Areas are comprehensive and well-structured, covering the key pillars of responsible mining.

However, the language and indicators could be simplified to make implementation easier for mid-sized and developing-country mining companies.

It would be helpful if CMSI provided:

Clear guidance notes or regional examples (e.g., from Africa, South America)

A phased approach for compliance to allow smaller operators to progressively meet requirements

Alignment with national mining regulations and local realities, especially in community engagement, water management, and supply chain ethics.

This would make the standard both globally credible and locally achievable.

Performance Area 03: Responsible Supply Chains

COMMENT:

Specific Comment -Performance Area 3: Responsible Supply Chains

The section on Responsible Supply Chains should further emphasize local supplier development and capacity-building programs for suppliers in developing countries such as Ghana.

Many local contractors and vendors supporting mining operations lack access to financing, training, and certification to meet global standards.

CMSI could encourage mining companies to:

Partner with local business associations and technical institutions to improve supplier capability.

Integrate responsible procurement principles into contract evaluations and tendering processes.

Report annually on progress in local supplier inclusion and development outcomes.

This will make the standard more inclusive and practical for mining operations in regions where local content contributes directly to social and economic development.

QUESTION 1

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

Response: **3: Meets expectations**

3,The structure clearly defines expectations for responsible mining and aligns with international best practices.”

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**

3,The structure clearly defines expectations for responsible mining and aligns with international best practices.”

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

3,The structure clearly defines expectations for responsible mining and aligns with international best practices.”

Document:
Claims

3. Claims

SECTION: 3.1 Types of Claims, 3.1.3 Performance Claim

COMMENT:

Specific Comment -Performance Claim Thresholds

The Performance Claim requirements set a strong minimum benchmark (80% aggregated score and Good Practice in all Performance Areas).

However, the policy could encourage progressive recognition for facilities showing measurable improvements even before reaching full Good Practice across all areas.

This approach would motivate continuous improvement and increase participation among facilities in developing regions (like West Africa), where achieving 80% performance across all indicators may initially be challenging due to limited resources or data systems.

Recommendation: Introduce a “Progress Level Claim” category for facilities demonstrating a clear year-on-year improvement trend verified by assurance providers, to foster inclusivity and motivation for gradual excellence.

General Comment

COMMENT:

General Comment -Clarity, Transparency, and Local Awareness

The Claims Policy provides a clear and detailed framework to ensure credibility and prevent greenwashing – an important step for global responsible mining.

However, for better transparency and awareness, the CMSI Secretariat could consider:

Translating key claim definitions and requirements into major mining-region languages (e.g., French, Spanish, Swahili, Twi) to ensure broader understanding and compliance;

Developing training modules or webinars for communications officers and sustainability managers at mining sites to properly apply the Claims Policy;

Setting up a public dashboard showing which facilities are at “Commitment”, “Assured”, or “Performance” levels for easier comparison by investors, suppliers, and communities.

These actions would strengthen global trust and help prevent unintentional misuse or misunderstanding of claims.

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

4,The Claims Policy provides a strong and transparent mechanism that encourages accountability and continuous improvement among mining companies. The disclosure of both individual performance area scores and aggregated progress levels helps stakeholders track tangible progress, build trust, and incentivize companies to achieve higher standards of responsible mining.