

# CMSI Consultation Response

## Respondent Details

NAME

Suzanne Davis-Hall

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

Genesg Inc

## 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: 2: Below expectations

The revised version addresses some issues from the original draft, such as clearer assurance processes, stronger disclosure requirements, and minimum thresholds for Performance Claims. These elements improve governance and transparency.

However, some changes move in the wrong direction. In particular, renaming “Foundational Practice” to “Towards Good Practice” weakens clarity. The original term more accurately conveyed the concept of a baseline entry point, whereas the revised wording risks confusion about whether this level represents a genuine practice standard or simply a transitional stage.

More fundamentally, the system remains overly focused on verifying management systems and documentation. It does not consistently require demonstration of outcomes in practice. As a Copper Mark Assessor, TSM verifier, and experienced EMS auditor and implementer, I know from experience that management systems alone can become paper-driven and detached from real-world performance. For this reason, the revised system represents only a partial improvement compared to the original consultation version.

### 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: 2: Below expectations

The updated system has the potential to provide global consistency by consolidating multiple frameworks into one. This will simplify expectations for companies operating across jurisdictions and commodities. However, the system remains predominantly process-driven. Without stronger requirements for outcome evidence, facilities can achieve and maintain claims without demonstrating that their operations are reducing impacts on people or the environment.

In my experience implementing and auditing management systems at mine sites worldwide, systems can become paper-driven if they are not tested against real-world effectiveness. The Copper Mark shows that a risk-based, evidence-driven approach is possible, and that assessors with mining expertise can evaluate whether impacts are genuinely being managed. Unless the CMS moves further in this direction, it will raise baseline practices but will not, on its own, drive substantial performance improvement globally.

Document:  
Assurance

QUESTION 1

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

Response: 1: Significantly below

The Assurance Process sets out a structured and transparent cycle, with clear requirements for self-assessments, independent assurance, and public reporting. It also incorporates a risk-based approach, which is appropriate.

However, the process remains too focused on confirming whether management systems and documentation are in place, rather than testing whether those systems are effective in practice. Stakeholder interviews are positioned as supplementary evidence rather than central to verifying outcomes.

As a Copper Mark Assessor, TSM verifier, and experienced EMS auditor and implementer, I know that management systems can appear strong on paper but fail to deliver real improvements on the ground. The Copper Mark model shows that risk-based assurance can still be evidence-driven, requiring facilities to demonstrate practice and effect, with assessors who understand mining risks. The CMS process does not yet provide this level of robustness.

To be credible and replicable, the Assurance Process should require outcome evidence (e.g., monitoring data, stakeholder confirmation, resolved grievances) alongside system evidence, and should ensure that assurance providers have mining-specific expertise. Without this, it risks validating paper-driven compliance rather than real performance.

Document:  
Standard

QUESTION 1

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

Response: 1: Significantly below

The Consolidated Standard has broad and appropriate scope, covering the essential areas of responsible production. However, the content leans too heavily toward verifying systems and procedures rather than requiring facilities to demonstrate effectiveness in practice.

As a Copper Mark verifier, TSM verifier, and experienced EMS auditor who has implemented management systems at mines globally, I have seen how management systems can become paper-driven and compliance-focused. Without requiring outcome evidence, there is a real risk that the Standard could validate facilities that perform well on documentation but not on-the-ground practice.

## 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: 1: Significantly below

The requirements are clearly written and would allow consistent interpretation across sites. However, clarity alone does not ensure performance improvement. Because most requirements are system-based, facilities could demonstrate conformance without showing that their operations are actually reducing impacts.

The Copper Mark demonstrates that a risk-based approach can still be evidence-driven: facilities must show evidence of practice and effect, and assessors must have the mining expertise to interpret it. In my experience designing and implementing EMSs, clarity of requirements is necessary, but performance improvement only happens if outcome evidence is required and evaluated.

## 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: 1: Significantly below

The three-level structure provides a logical progression. “Towards Good Practice” (previously “Foundational Practice” which I actually prefer) offers an entry point, “Good Practice” establishes a baseline, and “Leading Practice” introduces more advanced expectations such as climate targets and biodiversity “no net loss.”

The framework is sound, but continuous improvement should not only be about maturing systems. In my experience implementing EMSs, true improvement requires verifying that systems deliver results in practice. Without outcome evidence embedded at each level, the structure risks becoming a procedural ladder rather than a driver of tangible change.

## Document: 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: 1: Significantly below

The Claims Policy improves transparency by requiring disclosure of performance scores for each Performance Area, aggregate scores, and conditions for Performance Claims. These measures should help stakeholders track progress and reduce the risk of misleading claims.

However, the system is still built on scoring against management system requirements. A facility can achieve a Performance Claim by meeting documentation and procedural requirements, without demonstrating that its operations are delivering tangible improvements for people or the environment. In this way, the transparency offered does not necessarily incentivise continuous performance improvement –it incentivises better management systems and reporting.

As a Copper Mark Assessor, TSM verifier, and experienced EMS auditor and implementer, I have seen that transparency is only effective when assurance includes evidence of outcomes. The

Copper Mark, for example, requires facilities to demonstrate practice and effect in context, which gives its claims greater credibility. The CMS Claims Policy should similarly require outcome evidence to be part of eligibility for Performance Claims if it is to truly incentivise improvement.