

CMSI Consultation Response

Respondent Details

NAME

Eric Schwamberger

COUNTRY

United States

PERMISSION

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

STAKEHOLDER

Other standard setting body

ORGANISATION

International Cyanide Management Institute

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: 3: Meets 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: 3: Meets expectations

Document:
Assurance

QUESTION 1

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

Response: No Response

Document:
Standard

Performance Area 22: Pollution Prevention

SECTION: 22.5 Cyanide, Towards Good Practice, 3

COMMENT:

The International Cyanide Management Institute congratulates the four sponsors of the Consolidated Mining Standard Initiative on the progress made in advancing this ambitious undertaking. We appreciate the opportunity to comment on the revised draft of the Consolidated Standard's during this final public consultation.

Our comments are focused entirely on Section 22.5 of the Consolidated Standard, which addresses cyanide. Specifically, we recommend the language in part 3 of the Requirement for Towards Good Practice be amended to read as follows:

“Conduct and publish an independent assessment of conformance with the International Cyanide Management Code. The assessment should include an explanatory statement as to why Cyanide Code certification is not possible at present, and, if appropriate, a timeline as to when the facility anticipates that it will achieve Good Practice with respect to cyanide management.”

It is our view that the standard would be strengthened by an independent assessment and statement, rather than a Facility’s opaque statement that it is operating “in line” with the Cyanide Code’s standards of practice. We believe that such transparency is of high value to many stakeholders, and that stakeholders would benefit from being informed about the Facility’s ability to meet the Code’s requirements for safety to workers, communities, and the environment.

Further, it is our view that the Facility should not be constrained to a self-assessment and rather would benefit from a gap assessment conducted by an experienced external party knowledgeable about the Cyanide Code and its requirements and expectations for mine operations. We believe that requiring an independent gap assessment would benefit worker, community, and environmental safety, the performance of the mining industry, and the credibility of the Consolidated Standard.

Further, it is our view that publication of the assessment would contribute to stakeholder dialogue by informing communities about the Facility’s current efforts to conform with the Cyanide Code, and the areas where improvement may be needed to meet the Cyanide Code’s standards for cyanide safety. In some instances, a Facility may understandably be precluded from seeking Cyanide Code certification due to limited mine life, limited funding for major capital improvements, or technical limitations as might be the case at a Facility reprocessing tailings, and that should be noted in the assessment. Providing a timeline to stakeholders for the anticipated achievement and maintenance of certification to the Cyanide Code provides a target that the Facility and its stakeholders can use to assess progress, independently evaluate the operations safe cyanide management practices, and improvements over time.

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

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: 4: Exceeds 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

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: No Response