CMSI Consultation Response

Respondent Details

NAME
Victoria Savelieva

COUNTRY
Russian Federation

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

STAKEHOLDER
Industry / trade organisation

ORGANISATION
Not Specified

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, 3.1.1 Assurance Provider Qualifications

COMMENT:

"Assurance Providers must disclose any direct business, contractual or financial relationship with or financial interest in the Facility, or company within the scope of the assessment."

We propose to establish criteria for identifying a conflict of interest in such situations. For instance, is it reasonable to ban a particular Assurance Provider if they have previously conducted an audit on the Company's sustainability reports? Furthermore, such a prohibition should be implemented prior to the publication of an Assurance Report, for example during the preparation of an Assurance Plan, to avoid unnecessary work.

SECTION: 3.2 Consolidated Standard Training, 3.2.3 Maintaining Assurance Provider Approval Status

COMMENT:

"A reported grievance against the Assurance Provider deemed by the Secretariat to be of a nature to warrant status removal."

How will the Secretariat ensure the authenticity of this grievance?

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4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.3 Media Scan

COMMENT:

We propose to describe Media Scan in more detail. What does Media Scan entail? Is it the search and analysis of controversial issues? Is it supposed to rank the controversies, take into account the reaction of the Parent Company or Facility to the identified controversies, the opportunity for the Parent Company or Facility to provide a comment on the results of the Media Scan?

SECTION: 4.2 Planning, 4.2.5 Assurance Provider Selection

COMMENT:

For example, at this stage (4.2.5 "Assurance Provider Selection"), the Secretariat may decide whether this specific Assurance Provider can provide Assurance.

SECTION: 4.5 Reporting

COMMENT:

"The Assurance Report must be produced using the template in Appendix D and is separate from the management report."

We suggest providing the Assurance Provider with the opportunity to supplement the structure of the Assurance Report, depending on the specific circumstances.

COMMENT:

"The number of interviewees by stakeholder category. The categorisation must ensure that individual interviewees cannot be identified."

Is it possible that the Assurance Provider may not have conducted an interview for a particular sub-section of the Performance Area? If so, should they clarify this in the paragraph?

SECTION: 4.6 Continual Improvement Plan

COMMENT:

"Continued failure to improve performance may lead to the Facility becoming ineligible to participate in the Consolidated Standard."

Is it possible to resume Facility's participation in the Consolidated Standard after that? For example, after a change in management or ownership? We suggest addressing this in the Assurance Process.

COMMENT:

"The Continual Improvement Plan is required to be submitted to the Secretariat within 30 days of the publication of the final Assurance Report."

The specified period seems too short. For example, the Continuous Improvement Plan may take a significant amount of time to be approved by the parent company. We suggest extending it to 45 or 60 days in order to ensure that all necessary steps are taken and the plan is thoroughly reviewed.

COMMENT:

4.6.2, "...they will no longer be eligible to make a Consolidated Standard claim under the Consolidated Standard Claims Policy."

We suggest clarifying whether the Facility will be able to resume its participation in the Assurance Process after some time has passed.

QUESTION 1
From your perspective, does the Assurance Process meet your expectations of a robust, credible, replicable and transparent approach?
Response: 3: Meets expectations

Document:
Standard

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Good Practice, 3

COMMENT:

Please, clarify what constitutes "sustainability metrics"

SECTION: 1.2 Sustainability Reporting, Leading Practice, 1

COMMENT:

The difference between "impact materiality" (in Good practice) and "double materiality" may cause confusion for companies already reporting under IFRS S1/S2 or GRI 2021 frameworks.

SECTION: 1.3 Transparency of Mineral Revenues, Towards Good Practice, 2

COMMENT:

The standard could allow disclosure "to the extent permitted by law" and clarify expectations for non-EITI jurisdictions.

SECTION: 1.4 Risk Assessment, Towards Good Practice, 1

COMMENT:

For some companies, there is no or very little difference between corporate and facility risks. Please, clarify how CMSI expects corporate and facility registers to align.

SECTION: Applicability

COMMENT:

Please clarify whether the existence of a centralised corporate-level implementation satisfies Facility requirements.

COMMENT:

A general recommendation for the Standard is to establish clear mapping against existing standards (GRI, ISO etc). While the Standard provides references under each topic, it is not clear which specific criteria are aligned with these sources or how the alignment is structured. Consequently, companies starting implementation from scratch must independently assess which elements are already in place and which are missing for each criterion.

Performance Area 02: Business Integrity

SECTION: 2.2 Business Ethics and Accountability, Leading Practice, 4

COMMENT:

Such disclosure could raise privacy and legal concerns. Aggregated or anonymised reporting could be more fitting.

SECTION: Applicability

COMMENT:

Please specify if corporate-level implementation satisfies Facility requirement

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SECTION: Glossary and Interpretive Guidance

COMMENT:

The KYC expectation is clear and well-received, but the depth of due diligence remains undefined, some proportionality guidance could be helpful (e.g. aligned with OECD risk-based due diligence principle).

Performance Area 03: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Good Practice, 1

COMMENT:

The term "most significant parts or segments of the supply chain" lacks definition. Please clarify objective indicators for segmentation

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SECTION: 3.2 Responsible Mineral Sourcing, Good Practice, 4

COMMENT:

The requirement to retain supply-chain and payment records for 10 years may conflict with local data-protection or privacy laws and could be challenging. Adding a notion "for at least 10 years or as permitted by local law" could account for local specificies.

SECTION: Applicability

COMMENT:

The scope remains unclear, especially in the context of mining companies that do not source third-party materials but sell their own production. This could result in misinterpretation during assurance.

Performance Area 04: New Projects, Expansions and Resettlement

SECTION: 4.1 Environmental and Social Impact Assessments, Good Practice, 2

COMMENT:

Please provide method guidance or references

SECTION: 4.1 Environmental and Social Impact Assessments, Good Practice, 5

COMMENT:

Permit summarised/redacted ESIA disclosures with a documented rationale. To avoid revealing sensitive content, please require community-accessible formats.

Performance Area 05: Human Rights

SECTION: 5.1 Human Rights, Good Practice, 1

COMMENT:

This section can potentially overlap with PA 3, hence, causing potential duplication/confusion on where supply-chain risks are managed. Please include more clarification on the alignment with PA 3.

SECTION: 5.1 Human Rights, Towards Good Practice, 2

COMMENT:

Please clarify the method and the expected review frequency. This is clarified for Good practice and Leading Practice, but for Towards Good Practice this information is also necessary.

SECTION: Applicability

COMMENT:

Please clarify that a corporate policy aligned with the UNGPs meets the requirement.

Performance Area 06: Child and Forced Labour

SECTION: 6.1 Prevention of Child and Forced Labour, Good Practice, 1

COMMENT:

Please clarify if such a requirement implies monitoring as well.

SECTION: 6.1 Prevention of Child and Forced Labour, Towards Good Practice, 3

COMMENT:

Please specify a minimum guidance for the method as well as a review frequency.

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Good Practice, 1

COMMENT:

Please, clarify which minimum evidence is expected and review frequency.

SECTION: 7.1 Rights of Workers, Good Practice, 6

COMMENT:

In this section, as well as in other sections that ask to follow a specific quality level or standard, provide clarification whether national standards could serve as objective references.

SECTION: 7.1 Rights of Workers, Towards Good Practice, 3

COMMENT:

Please clarify if periodic reviews with documented action plans to address gaps are required.

Also, clarify the connection between corporate-level commitment and facility-level implementation.

SECTION: 7.2 Grievance Mechanism for Workers (Employees and Contractors), Leading Practice, 2

COMMENT:

he notion of grievance mechanism is repetitively referenced in several PAs and their sections. For guidance, make sure there is a guidance note that could explain how facilities may present one integrated labour & grievance system with a crosswalk to different PAs to avoid duplication in assurance.

SECTION: 7.2 Grievance Mechanism for Workers (Employees and Contractors), Leading Practice, 3

COMMENT:

Provide a specification regarding the review frequency.

Performance Area 08: Diversity, Equity, and Inclusion

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 3

COMMENT:

Clarify if process/structural targets are allowed.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 5

COMMENT:

Please specify the target group of workers.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 7

COMMENT:

Explain the expectation or examples of the expected integration.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 3

COMMENT:

Please provide the expectation of the review frequency.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 4

COMMENT:

Clarify what reasonable adjustment is.

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Good Practice, 9

COMMENT:

Please provide more specific guidance for companies to avoid any conflict with local regulation and data protection, e.g. publish aggregated metrics (e.g., site-level %, not small-cell data), disclose data completeness/limitations, and outline anonymization practices in workforce comms.

SECTION: Applicability

COMMENT:

Allow firms to include an assurance note: where law limits data or targets, facilities should document the legal analysis, use process-based objectives, and still be able to demonstrate progress via qualitative measures.

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Towards Good Practice, 4

COMMENT:

Specify if task coverage should be risk-based rather than frequency-based, ensuring that critical and infrequent high-risk tasks are included.

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Good Practice, 2

COMMENT:

Provide guidance and references to metrics used in the sector to allow facilities to benchmark progress realistically.

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Good Practice, 5

COMMENT:

Provide guidance and references that companies can use as examples.

SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 5

COMMENT:

Clarify that facilities should report fatalities transparently rather than risk losing conformance status. The requirement to "record zero fatalities in the reporting year" may be interpreted as a pass/fail criterion rather than a disclosure.

SECTION: 9.4 Monitoring, Performance and Reporting, Leading Practice, 1

COMMENT:

Allow a phased approach for newly acquired or high-risk assets, where Facilities can demonstrate improvement trajectories instead of fixed performance thresholds.

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Good Practice, 6

COMMENT:

How can this requirement be met if there was no emergency or crisis?

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 1

COMMENT:

Should these identified scenarios be published? If so, in what format and to what extent? Please clarify how detailed the disclosure should be.

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 3

COMMENT:

Is a corporate-level Emergency Preparedness and Response Plan(s) (EPRP) applicable here?

COMMENT:

Is a corporate-level Emergency Preparedness and Response Plan(s) (EPRP) applicable here?

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 4

COMMENT:

Do these requirements have to be public? Documents establishing teams may be of internal use only. This comment is aplicable for the whole question 10.1

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 7

COMMENT:

Please specify what type of engagement is meant.

Performance Area 11: Security Management

SECTION: 11.1 Security Management, Towards Good Practice, 2

COMMENT:

Please specify if a security risk assessment could be part of a human rights risk assessment.

SECTION: Applicability

COMMENT:

Please clarify how the Facility can prove that there is no risk to human rights from the provision of security.

Performance Area 12: Engagement

SECTION: 12.1 Engagement, Good Practice, 4

COMMENT:

Please specify who is the object of such trainings

SECTION: 12.1 Engagement, Good Practice, 6

COMMENT:

Please provide examples of how a Facility can suport the stakeholders' capacity.

SECTION: 12.1 Engagement, Towards Good Practice, 1

COMMENT:

Please specify what it means to "communicate locally". Is publishing such commitments on corporate web-sites applicable here?

SECTION: Applicability

COMMENT:

Is corporate-level disclosure applicable here?

SECTION: Glossary and Interpretive Guidance

COMMENT:

Please specify if the Facility itself defines who are the Vulnerable and underrepresented stakeholders and rights-holders.

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Community Impact Management, Leading Practice, 1

COMMENT:

Joint monitoring is valuable but potentially unrealistic in jurisdictions where community organizations lack technical expertise.

Clarify that capacity-building or third-party support may be used to enable effective joint monitoring (partnerships with universities or NGOs).

SECTION: 13.1 Community Impact Management, Towards Good Practice, 2

COMMENT:

The "mitigation hierarchy" is appropriate but lacks practical flexibility for remote northern operations, where baseline data collection and stakeholder engagement can be logistically constrained. Gold operations in Siberia and the Far East face long winters and isolated communities, making frequent on-site assessments unfeasible.

SECTION: 13.2 Community Development and Benefits, Good Practice, 9

COMMENT:

We recommend to provide a minimum disclosure template or framework aligned with GRI or ICMM to ensure comparability.

COMMENT:

The standard does not reflect national mechanisms of social partnership that exist in Russia (agreements with regional authorities, social-economic cooperation programs).

Recommendation: Recognise that compliance with certain CMSI requirements may be achieved through existing government-business mechanisms, provided transparency and reporting are ensured. In Russia, most social investments are executed via formal agreements with regional governments; duplication of procedures should be avoided.

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Indigenous Peoples, Good Practice, 1

COMMENT:

Provide guidance or examples of culturally appropriate engagement models for low-population, dispersed settlements (e.g., mobile consultations, seasonal meetings).

Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage, Good Practice, 5

COMMENT:

Recognize state-approved archaeological supervision and chance-find protocols as valid evidence of compliance.

In Russia, any discovery of artifacts triggers mandatory reporting and expert assessment by certified archaeologists.

SECTION: Intent

COMMENT:

The Standard's scope is appropriate but lacks detail on how to identify intangible heritage (traditions, rituals, oral history) in regions with limited cultural documentation.

Performance Area 16: Artisanal and Small-Scale Mining

SECTION: Applicability

COMMENT:

We recommend that CMSI further define the threshold or criteria for determining when ASM presence triggers applicability (e.g., proximity, scale, or degree of interaction with company operations).

COMMENT:

In the Russian Federation, artisanal and small-scale mining (ASM) is not recognised as a distinct or lawful form of mineral extraction under national legislation. The Federal Law "On Subsoil" (No. 2395-1) requires that all mining activities, including gold extraction, be conducted under a state-issued mining licence and in compliance with industrial safety and environmental standards.

Therefore, we suggest that CMSI clarify in the Applicability section of Performance Area 16 that this Performance Area is not applicable in jurisdictions where artisanal mining is prohibited or lacks legal recognition, such as the Russian Federation.

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Good Practice

COMMENT:

Recommending to introduce guidance on culturally appropriate consultation approaches in multilingual or remote regions.

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Towards Good Practice

COMMENT:

Please consider adding guidance on culturally relevant ways of communication

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Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Good Practice, 10

COMMENT:

Suggesting explicitly allowing corporate or regional aggregation of water targets where facilities share one watershed.

SECTION: 18.2 Collaborative Watershed Management, Towards Good Practice, 3

COMMENT:

Support requirement but recommend acknowledging that in some jurisdictions (including Russia) formal Integrated Water Resources Management (IWRM) structures are limited; allow alternative bilateral or regional cooperation mechanisms.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice, 2

COMMENT:

Consider recognising government-approved offset programs and allow for equivalency with national offset mechanisms, provided they achieve measurable conservation outcomes.

Performance Area 20: Climate Action

SECTION: 20.2. Climate Change Management (Facility Level), Good Practice, 7

COMMENT:

Specify whether this review must be audited or can be internal self-assessment.

SECTION: Applicability

COMMENT:

Specify how group-level targets should cascade to subsidiaries. In mining companies with vertically integrated operations, Scope 1 and 2 emissions boundaries overlap between subsidiaries (e.g., power generation for internal use). The standard should provide guidance on consolidation to avoid double counting.

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy for all Facilities, Good Practice, 2

COMMENT:

Please clarify overlap with Performance Area 21 (Tailings Management).

SECTION: 23.1 Circular Economy for all Facilities, Leading Practice, 1

COMMENT:

Please clarify which metrics qualify (e.g., waste reuse %, recycled input ratio, material efficiency).

SECTION: Applicability

COMMENT:

Please clarify how "product design" applies to mining operations, which do not manufacture end-user products.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Towards Good Practice, 2

COMMENT:

Please clarify whether this applies to legacy mines lacking early-stage closure planning.

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: 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: 4: Exceeds expectations

Document:
Claims

1. Introduction

SECTION: 1.2 Legal Compliance

COMMENT:

We propose to specify the new legislation around transparency

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SECTION: 1.3 The Consolidated Standard Claims

COMMENT:

Can claims be made at a Corporate-level if all facilities of the corporation have undergone Assurance on the Consolidated Standard?

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3. Claims

SECTION: 3.1 Types of Claims, 3.1.3 Performance Claim

COMMENT:

3.1.3 states that to continue to use the Performance Claim the Company must "maintain its performance to meet the minimum threshold to maintain and obtain the Performance Claim as defined below." Whereas in 3.1.3. it is stated that "To maintain the Performance Claim, the Facility must close any gaps to achieve Good Practice Level in all applicable Performance Areas within one assurance cycle." This is a contradiction. What does a Company have to do to maintain its Performance Claim? Meet the minimum threshhold or achieve Good Practice for all applicable PAs?

Disclaimer

COMMENT:

Is using any type of claim free for the Facility? Or does it have to pay any sort of fee for its use?

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: 3: Meets expectations