

# CMSI Consultation Response

## Respondent Details

NAME

Luis Campos

COUNTRY

United States

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

SmartAccEss

## 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

## 3. Who Can Conduct External Assurance?

SECTION: 3.1 Assurance Provider Requirements, 3.1.1 Assurance Provider Qualifications

COMMENT:

*I have a Certified Environmental Auditor (CEA) credential provide by the National Registry of Environmental Professionals, which is validated every year after showing 15 hours of Continuous Training. Please confirm this is also valid as a training credential*

SECTION: 3.1 Assurance Provider Requirements

COMMENT:

*The document says "To avoid potential risks of complacency or reduced independence, a Facility may choose to use the same Assurance Provider team for up to three cycles of assurance. After the third assurance cycle, the Facility must select a different team of approved Assurance Providers, whether from the same company or a different company"*

Can the individual or company return to the facility after leaving one cycle? (as it is with the Cyanide Code?)

---

## 4. Consolidated Standard External Assurance Process

SECTION: 4.3 Execution of Facility Assessment, 4.3.4 Performance Determinations

COMMENT:

*"Towards Good Parctice Level"*

*While I understand the name for this level, what happens when a site does not have anything in place? or very little? Giving a level of performance of "Towards Good Practice" might be misleading and not reflecting the current situation.*

*The should be one more level when there is nothing in place.*

---

SECTION: 4.6 Continual Improvement Plan

COMMENT:

*4.6.2 The document says "An incident resulting in significant negative impact on human rights"*

*Add "An incident resulting in significant negative social unrest"*

---

QUESTION 1

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

Response: 4: Exceeds expectations

Document:  
Standard

### General Comment

SECTION: NA

COMMENT:

*The document says*

*"Claims will only be issued as per the details in the Claims Policy. No claims will be issued unless the Facility has achieved ALL of the following: i) an aggregate score of at least 80%; ii) all applicable Performance Areas are at least at the Towards Good Practice Level"*

*item ii) seems to be incorrect. There is no other level below this (Towards Good Practice level)*

---

### Introduction

COMMENT:

*I don't think it is a good idea to link the Plan-Do-Check-Act cycle to the level of performance. For a site to be in Good Practice Level, it needs to have the Plan-Do-Check-Act cycle fully implemented for each of the 24 Performance Areas. That should be the minimum acceptable to be in Good Practice level*

---

## Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Good Practice, 0

COMMENT:

*Include development and implementation of emergency simulations (mock drills) program as part of the Good Practice Level*

---

## Performance Area 22: Pollution Prevention

SECTION: 22.2 Mineral Wastes, Towards Good Practice, 3

COMMENT:

*and address and implement identified gaps to be in line with the Code*

---

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: No Response

There should be one more level down when the site has nothing implemented, or have not shown good faith to try to comply

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: 3: Meets expectations