

CMSI Consultation Response

Respondent Details

NAME

Sian Edwards

COUNTRY

Australia

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

Indigital

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: 3: Meets expectations

Document:
Standard

Performance Area 01: Corporate Requirements

SECTION: 1.4 Risk Assessment

COMMENT:

The 'engage external stakeholders and rights holders in the risk assessment process' should be a 'Good Practice' requirement.

Include relevant internal teams should be Towards Good Practice.

The Leading Practice should be an external review at least every 2 years. This is the way that 'outside the gate' dependencies, impacts, risks and opportunities are going to be uncovered, assessed and managed whether that be water stewardship, physical impacts of climate change in supply chain, biodiversity risk, or ongoing consent issues.

Performance Area 03: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Leading Practice, 4

COMMENT:

If the Leading Practice requires collaboration with affected stakeholders in the assessment of prioritised sustainability risks, this reinforces the requirement of the 'Risk Assessment' section to have external stakeholders and rights holders being involved in the Good Practice level.

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Performance Area 04: New Projects, Expansions and Resettlement

COMMENT:

Should this reference FPIC for rights holders for Good Practice (and not just where there is resettlement?)

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: Intent

COMMENT:

I know this is about workplaces but generally, how is potential health impacts to the community addressed? for example, where identified health and safety risks will be present into the community. I am thinking of dust and contamination that goes outside the gate and may impact environment and community.

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Indigenous Peoples, Leading Practice, 1

COMMENT:

Could another element for Leading Practice be around data sharing. For example that data is shared with rights holders under the co-designed data governance protocols.

SECTION: 14.1 Indigenous Peoples, Leading Practice, 4

COMMENT:

For Leading Practice 4. Instead of the general 'Make improvements as required', could this be: 'Demonstrate continuous improvement and feedback'

Performance Area 22: Pollution Prevention

SECTION: 22.5 Cyanide, Good Practice, 1

COMMENT:

Can the section on claims be introduced a bit more - I don't actually understand what 'claims' are. I think this needs to be done before the criteria is stipulated.

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: 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: 3: Meets expectations