

CMSI Consultation Response

Respondent Details

NAME

Sally Johnson

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

Please Select

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: 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 19: Biodiversity, Ecosystem Services and Nature

SECTION: Glossary and Interpretive Guidance

COMMENT:

Re Critical Habitat: Whilst there is no universally accepted formula for making determinations on critical habitat, numerical thresholds have been defined for the first four critical habitat criteria (CR/EN

species; endemic/restricted-range species; migratory/congregatory species; threatened and unique ecosystems). These thresholds were obtained from globally standardized numerical thresholds published in the IUCN's A Global Standard for the Identification of Key Biodiversity Areas and Red List Categories and Criteria.

From experience the absence of quantitative thresholds leads to wide variability and inconsistency in how Critical Habitat is interpreted and applied across projects. This can undermine the credibility and comparability of assessments, and increases the risk that areas of high biodiversity value are either under (or over) classified. The new standard should adopt or cross-reference these quantitative thresholds and require consultation with appropriately qualified experts in making or validating Critical Habitat determinations.

COMMENT:

I am not sure whether this is for the standard or more for a "Guidance Note" if there is one. The draft standard refers to the Area of Influence (AoI) for biodiversity assessment, but it is equally important to define an explicit Area of Analysis (AoA) or Ecologically Appropriate Area of Analysis, when determining Critical Habitat. Many assessments conflate AoI and AoA, leading to underestimation of risks. This is particularly problematic for wide-ranging or migratory species whose critical areas only partially overlap with the AoI but are nonetheless affected through habitat loss, fragmentation, or disruption of movement corridors.

QUESTION 1

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

Response: 4: Exceeds 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: 4: Exceeds 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