

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Peru

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

Anonymous

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: No Response

No pude revisar todo

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: No Response

Ni pude revisar todo

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

No he podido revisar, mi sugerencia es que el aseguramiento tome en cuenta las directivas de la norma ISO 19011.

I haven't been able to review; my suggestion is that assurance take into account the directives from ISO 19011.

Overarching Glossary

COMMENT:

Debería incluirse la definición del término: Impacto positivo, considerando que las operaciones mineras también contribuyen de manera positiva en las zonas donde operan.

TRANSLATION:

The definition of the term should be included: Positive impact, considering that mining operations also contribute positively to the areas where they operate.

COMMENT:

Datos referenciales, podría traducirse como Línea Base.

TRANSLATION:

Reference data, could be translated as Baseline.

COMMENT:

Compromiso, también se generan en ambientes no públicos

TRANSLATION:

Commitment; also generated in non-public settings

COMMENT:

La revisión independiente, según definición sería diferente a la auditoría, debido que se indica que en la revisión independiente se emiten planes de acción.

TRANSLATION:

The independent review, according to the definition, would be different from the audit, since action plans are issued in the independent review.

COMMENT:

La auditoría interna no necesariamente puede ser llevada por personal de la empresa, debería dejarse abierta la posibilidad de contratar auditores externos que ejecuten la auditoría interna.

TRANSLATION:

The internal audit cannot necessarily be carried out by the company's own personnel; leave open the possibility of hiring external auditors to carry out the internal audit.

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TRANSLATION:

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COMMENT:

La definición de sistema de gestión es muy limitada, podrían considerar la definición de ISO, considerando que un sistema de gestión es más que procedimientos o Plataforma documentaria.

TRANSLATION:

The definition of management system is very limited; you could consider the ISO definition, given that a management system is more than procedures or a documentation platform.

Performance Area 03: Responsible Supply Chains

COMMENT:

Sistema de selección, en remplazo del término cribar

TRANSLATION:

Selection system, to replace the term sifting

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

El punto 1 de Buenas prácticas es muy parecido o igual al punto 4 de prácticas bien encaminadas.

TRANSLATION:

Point 1 of Good practices is very similar to or the same as point 4 of on-track practices.

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Leading Practice

COMMENT:

El punto 2 es muy parecido o igual al punto 3 de Buenas prácticas.

TRANSLATION:

Point 2 is very similar or the same as point 3 of Good Practices.

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Towards Good Practice

COMMENT:

2. ... cuando sea posible...

TRANSLATION:

2. ... when possible...

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy for all Facilities, Good Practice, 0

COMMENT:

Cuando sea posible el reciclaje, segregación, reuse, recuperación, etc.

TRANSLATION:

Where recycling, separation, reuse, recovery, etc. is possible.

COMMENT:

El compromiso público se refiere a una política que sea publica?

TRANSLATION:

Does public commitment refer to a public policy?

QUESTION 1

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

Response: 2: Below expectations

El alcance si me parece bueno dado que implica las materias que contribuye a la sostenibilidad de las operaciones mineral.

The scope does seem good to me, given that it involves topics that contribute to mineral operations' sustainability.

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: 2: Below expectations

Mi percepción es que se ha generalizado mucho los requisitos y creo que el estandar debería referencias estandares especificos de referencia, donde sea pertinente, para poder tener más detalle sobre lo que se espera en cada materia.

My perception is that a lot of the requirements were generalized, and I think the standard should have specific benchmark references, where relevant, in order to give more detail on what is expected for each topic.

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: 2: Below expectations

Considero que los tres niveles son buenos, pero igual considero que tenemos puede haber cruces entre ellos y en ese caso cual prevalece

I think the three levels are good, but I still think there could be crossover between them, in which case which one would prevail?

Document:
Claims

1. Introduction

COMMENT:

Cumplimiento legal, debemos comprender que las empresas deberan cumplir las normas legales que son aplicables y que generan alguna obligación a la empresa, no se incluye requisitos voluntarios.

TRANSLATION:

Legal compliance; we should expect companies to comply with the applicable legal regulations which create an obligation for the company, not including voluntary requirements.

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