

CMSI Consultation Response

Respondent Details

NAME

Şenol KARADEMİR

COUNTRY

Turkey

PERMISSION

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

STAKEHOLDER

Assurance provider/auditor

ORGANISATION

Q500 Engineering

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

4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.11 Interviewing Workers, Stakeholders and Rights

COMMENT:

Given that the risk of retaliation in stakeholder and employee interviews is not merely a hypothetical situation in many countries, but a structural reality of fear that can affect individuals' jobs, livelihoods, social status, and even physical safety, it is critically important that the auditor, exercising professional judgment, takes this pressure limiting freedom of expression into account and, where necessary, notes that statements may have been made "under fear of retaliation" in a confidential and anonymous manner. This allows the auditor to interpret interview data not as it is, but within a security-focused ethical framework, thereby simultaneously safeguarding the integrity of the assurance process and human safety.

SECTION: 4.2 Planning, 4.2.4 Self

COMMENT:

While self-assessment is a valuable starting point for mining operations, the lack of a defined cross-checking mechanism to verify its accuracy may increase the audit burden and lead to risks being identified too late. If the statement is inflated/incorrect/incomplete, external verification may start incorrectly in terms of timing, scope, and risk analysis. The auditor may have started the audit at a disadvantage.

SECTION: 4.2 Planning, 4.2.7 Understanding the Operational Boundaries

COMMENT:

The current definition of facility boundaries is open to broad interpretation in practice, which can lead to different applications regarding whether ports, pipelines, road transport, and other logistics operations are included in the facility. This situation poses the risk of strategically narrowing the scope of control and weakening the integrity of the verification process for some businesses. As the scope determination phase forms the basis of the system's reliability and transparency, uncertainty in boundary determination directly affects assurance quality.

To increase consistency, reduce excessive reliance on auditor judgment, and eliminate differences in interpretation among stakeholders, it is recommended that a boundary decision tree based on clear criteria supporting the scope determination process be published. This tool will contribute to decisions regarding which activities are covered by facility boundaries being made in a traceable, repeatable, and auditable manner.

SECTION: 4.3 Execution of Facility Assessment, 4.3.5 Non

COMMENT:

The two improvement windows provided for corrective actions—30 days and 12 months—create the possibility for companies to strategically defer high-impact nonconformities to the 12-month window, thereby extending the process, since the concept of "operationally significant" nonconformity has not been defined. This creates a gap that could weaken the risk mitigation effectiveness and time sensitivity of the assurance process.

SECTION: 4.5 Reporting

COMMENT:

While the Assurance Report is publicly available, the working papers relied upon by the auditor are completely confidential; in cases involving allegations of serious violations, the lack of access to the evidence set may lead to serious debates regarding transparency, accountability, and dispute resolution. Therefore, in situations involving risks to life or environmental damage, it is recommended that a controlled review mechanism be established, triggered by the Secretariat and conducted by an accredited, independent third party, which would satisfy the need for verification while preserving the confidentiality of the working papers.

SECTION: 4.6 Continual Improvement Plan, 4.6.2 Re

COMMENT:

If certain mines involve factors such as geotechnically sensitive dams, heap leach pads, high water risk, conflict zones, intense community relations, and human rights risk, waiting three years may be too long. For some high-risk facilities, a three-year assurance cycle may create an excessively long period between audits, given the dynamics of risks and the potential severity of impacts. Therefore, it is recommended that a risk-based approach be adopted for facilities in the high-risk group, shortening the verification period to 18-24 months.

QUESTION 1

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

Response: **5: Significantly exceeds**

Document:
Standard

QUESTION 1

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

Response: 5: Significantly exceeds

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: 5: Significantly exceeds