

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

China

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

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: 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 03: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Good Practice, 2

COMMENT:

*The expectation for all potentially affected stakeholders, including those along transportation routes, to have access to grievance mechanisms, can be difficult in some contexts and at parts of the value chain.*

*Recommended Action: Provide clearer guidance around expectations (e.g., on communication of grievance mechanisms along supply chains and during mineral transit) and how to evidence this through audit.*

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## **Performance Area 04: New Projects, Expansions and Resettlement**

SECTION: 4.2 Land Acquisition and Resettlement

COMMENT:

*Companies that acquire assets often inherit legacy resettlement issues, including unresolved commitments or community grievances. The Standard currently lacks guidance on how these situations should be addressed.*

*Recommended Action: Provide specific guidance on how companies should assess and respond to legacy resettlement issues; Clarify expectations for due diligence, community re-engagement, and remediation of past impacts.*

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## **Performance Area 07: Rights of Workers**

SECTION: 7.1 Rights of Workers, Good Practice, 0

COMMENT:

*The Standard encourages offering development opportunities for women, but clearer guidance is needed on how to do this effectively in culturally diverse contexts. In some regions, cultural norms may limit women's participation unless proactive, respectful strategies are used. Additionally, it can be a challenge for companies to set quantitative targets for local procurement and employment of women and vulnerable groups due to cultural and educational barriers. Low targets which would be realistic in the operating context may be seen as unambitious.*

*Recommended Action: Provide guidance on culturally sensitive approaches to promoting women's participation.; Include examples of good practices (e.g., targeted training, mentorship, flexible work arrangements).*

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## **Performance Area 09: Safe, Healthy and Respectful Workplaces**

SECTION: 9.1 Health and Safety Management

COMMENT:

*Other standards includes detailed requirements for managing infectious diseases within their safety chapter, while the Consolidated Mining Standard does not, which may represent a gap in the latter's coverage.*

*Recommended Action: Consider building in prevention and management of infectious diseases into the standard to provide best practice guidance*

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SECTION: 9.2 Psychological Safety & Respectful Workplaces, Good Practice, 4

COMMENT:

*It can be difficult to implement trauma-informed processes and provide audit evidence for psychological safety, especially in regions where such practices are not established or prioritized.*

*Recommended Action: Provide greater clarity on minimum evidence requirements.*

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## Performance Area 12: Engagement

SECTION: 12.1 Engagement, Good Practice, 4

COMMENT:

*The Standard requires inclusive stakeholder engagement, but more clarity is needed on how this will be audited –especially when engaging illiterate stakeholders. Gathering and collating feedback from such groups is time-intensive and requires tailored approaches.*

*Recommended Action: Provide guidance on acceptable methods for engaging illiterate or marginalised stakeholders (e.g., oral interviews, visual tools, community facilitators); Clarify how auditors will assess the quality and inclusiveness of engagement processes.*

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## Performance Area 13: Community Impacts and Benefits

SECTION: 13.2 Community Development and Benefits

COMMENT:

*The term “local” is used across several criteria but lacks consistent definition. In many jurisdictions, legal frameworks already define “local,”. The glossary for this section states that each facility must define local relevant to their own context but provides no methodology or further detail on how to do this.*

*Recommended Action: Provide clearer guidance on how “local” should be defined, especially in relation to existing legal frameworks; Clarify how this definition will be audited to ensure transparency and consistency.*

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## Performance Area 16: Artisanal and Small-Scale Mining

SECTION: 16.1 Artisanal and Small

COMMENT:

*The expectation appears to be that companies will involve themselves in interactions between ASM operators, however there are both legal and security concerns associated with companies doing this in some contexts. Additionally, defining and identifying legitimate ASM can be challenging.*

*Recommended Action: Clarify what is meant by collaborate “where possible”, including specifying whether there are exceptions in cases where there are security-related concerns associated with potential engagement. Additionally, clarify how established standards such as the CRAFT standard or the Normative Framework for Cobalt ASM can provide clearer criteria for responsible ASM engagement and due diligence.*

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## Performance Area 18: Water Stewardship

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 2

COMMENT:

*The requirement to co-design aspects of water management with affected stakeholders raises concerns about the inputs of some of these stakeholders, such as NGOs with unrelated agendas. Identifying representative stakeholders among large populations living near water sources can be challenging, and water projects differ from community projects in their direct impact on daily life and it can be very challenging for impacted stakeholders to participate in very technical discussions.*

*Recommended Action: Provide clearer guidance in the standard regarding stakeholder and affected rightsholder identification and inputs. Also provide clear, actionable instructions for site-level operations to meet minimum requirements, seeking practical guidance on what actions are necessary for compliance.*

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## **Performance Area 21: Tailings Management**

SECTION: 21.1 Tailings Management, Towards Good Practice, 0

COMMENT:

*The regulatory environment for tailings management in China differs significantly from that of other countries, with strong government involvement in system design and monitoring of tailings facilities. In many cases, government agencies play a central role in managing safety and social risks, which may reduce the need for companies to fully implement all aspects of the Global Industry Standard on Tailings Management (GISTM). As a result, strict adherence to GISTM may not be feasible or relevant across the entire Chinese market.*

*Recommended Action: Acknowledges the unique regulatory context of tailings management in different countries. Clarify how alignment with GISTM should be interpreted in jurisdictions where government oversight may already fulfill or exceed certain safety and social risk requirements. This could include outlining acceptable alternatives or adaptations to GISTM implementation, ensuring the Standard remains applicable and meaningful across diverse regulatory environments.*

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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