

# CMSI Consultation Response

## Respondent Details

NAME

Dave Knight

COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

One Planet Limited

## 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

In general, the consolidated standard has balanced the diverse range of stakeholder interests, practicality and auditability, in a fairly concise way - well done. There are opportunities to strengthen the standard in relation to context based goals and thresholds to further drive performance towards science and context based goals. The performance levels model goes some way towards this and could be strengthened by the inclusion of specific performance thresholds across the levels for appropriate criteria, e.g. GHG, DEI, H&S.

Document:  
Assurance

## 3. Who Can Conduct External Assurance?

SECTION: 3.1 Assurance Provider Requirements

COMMENT:

*Associated level of effort: It is useful to have guidance on typical expected effort (days) to audit range of facilities, e.g. drawing from ITF tables. This helps ensure consistency of audit process and reduces risks that some CB's will try to undercut costs through inappropriate time allocation. Of course each audit is different but general guidance is useful.*

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COMMENT:

*Typically there are defined roles in an assurance team including lead auditor, expert subject matter auditors, and local experts for cultural and indigenous knowledge for example. I think the guidance would benefit from a description of Audit teams and roles.*

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## 4. Consolidated Standard External Assurance Process

SECTION: 4.1 Methodology

COMMENT:

*ISAE 3000 is being superceded by ISSA 5000 from end Dec 2026 - the 2027 reporting year.*

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SECTION: 4.2 Planning, 4.2.13 External Stakeholder and Rights

COMMENT:

*Additional guidance suggestion:*

*Stakeholder and rights holder interviews should be conducted by appropriate personnel from the audit team, e.g. female auditors for female employees, people with local and indigenous knowledge for indigenous populations.*

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SECTION: 4.2 Planning, 4.2.3 Media Scan

COMMENT:

*Media scan should be conducted in languages and media relevant to the facility*

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SECTION: General Comment

COMMENT:

*Not enough focus on audit planning which is critical for a successful audit and is additional to self-assessment and the actual audit*

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## Appendices

SECTION: D. Draft Reporting Template

COMMENT:

*I note there is no business improvement or recommendation column. This might be helpful in support of continual improvement.*

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QUESTION 1

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

Response: 3: Meets expectations

It could be presented slightly more clearly with the narrative split into more tables, process flow graphics, etc.

Document:  
Standard

## Introduction

COMMENT:

*4 implementation.*

*Information on implementation is provided.*

*Clarity is needed on whether it is a corporate, site or product based certification. Care is needed to ensure claims are accurate and involvement of one site or part of a business does not lead to misleading claims.*

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## Performance Area 01: Corporate Requirements

SECTION: 1.4 Risk Assessment

COMMENT:

*Facility Activities*

*Does this include risks associated with the supply chain/any procurement?*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*Impact materiality: is relevant for environmental impacts as stated but examples of multiple stakeholders does not include voiceless stakeholders like nature and future generations which depend on the environment*

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## Performance Area 02: Business Integrity

SECTION: 2.1 Legal Compliance, Good Practice

COMMENT:

*Customary law is not covered. (Might be covered in Indigenous populations section?). Incorporating customary law may be appropriate for good and leading practices.*

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## Performance Area 03: Responsible Supply Chains

SECTION: 3.2 Responsible Mineral Sourcing

COMMENT:

*OECD Alignment is not always clear - OECD has alignment assessment methodology for process and implementation, however there is no central list on 'OECD aligned' programs and various claims relating to alignment are made. This additional guidance will be important to clarify what is meant by OECD aligned.*

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

SECTION: 4.2 Land Acquisition and Resettlement, Good Practice, 1

COMMENT:

*Resettlement and compensation is often based on like for like, however, typically in mined areas, due to topsoil disruption and storage, boundary edge spread and post mining restoration techniques and it can be challenging to replace the same depth and quality of topsoil. More detail is required in the guidance on appropriate depths and requirements for replacement land, restored land and compensation should the original quality and depth of soil not be able to be returned.*

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

SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 3

COMMENT:

*Leading and Lagging indicators are not defined - experience shows this is useful to define, especially leading indicators, which people sometimes find harder to understand*

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## **Performance Area 12: Engagement**

SECTION: 12.1 Engagement

COMMENT:

*The environment and is typically underrepresented and seen through the eyes of proxi groups that depend on eco-system services. However, other species, nature and future generations are 'voiceless stakeholders' who need some form of representation. Legitimate representation is not always clear. I recommend developing further guidance on how voiceless stakeholders can be appropriately and legitimately represented.*

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## **Performance Area 14: Indigenous Peoples**

SECTION: 14.1 Indigenous Peoples, Towards Good Practice, 2

COMMENT:

*14.1.2 states identify, in coordination with State or other recognised authorities indigenous peoples. This can be problematic where the state does not legally recognise indigenous peoples or specific groups. Recognition may be expanded to include self-identified or customary indigenous groups.*

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## **Performance Area 18: Water Stewardship**

SECTION: Glossary and Interpretive Guidance

COMMENT:

*Watershed and catchment often used interchangeable, suggest clarifying that catchment = watershed.*

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## Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice

COMMENT:

*Could be more guidance on management methods to retain and develop biodiversity through soil banking, species collection and maintenance through establishing and running plant nurseries etc. Also soil quality and quantity should be called out more as biodiversity net gain is challenging when soil depth and quality is not maintained.*

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## Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level)

COMMENT:

*Need to be clearly that Climate Action at any level needs to involve reducing the drivers of climate change including the use of fossil fuels in mining operations (and indeed the mining of fossil fuels) as well as, reducing fugitive methane, Land use change and deforestation. Call it out rather than just looking at the outcomes.*

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COMMENT:

*Assessing direct and indirect Climate risks and adaptation measures are absent from this section*

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## Performance Area 22: Pollution Prevention

SECTION: 22.6 Accidental Polluting Releases

COMMENT:

*Mention this means spills and leakages*

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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

There are some sections where additional guidance is needed for consistent implementation as per specific comments.

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

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

It would be good to clarify claims for other mining assurance in relation to the other foundation standards and how they will align over time: WGC responsible Gold mining principles and assurance process, MAC TSM, ICMM assurance process.