

CMSI Consultation Response

Respondent Details

NAME

giuseppe damiano

COUNTRY

United States

PERMISSION

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

STAKEHOLDER

Supplier / business partner

ORGANISATION

RAPID LA Peru

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: 5: Significantly exceeds

Document:
Assurance

QUESTION 1

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

Response: 4: Exceeds expectations

Document:
Standard

Performance Area 05: Human Rights

SECTION: Intent

COMMENT:

In reference to the fundamental Human Right to live: this section should also explicitly reference Performance Area 10: Emergency Preparedness and Response, as Disaster Risk Reduction is fundamental to safeguarding the community's right to life and protecting their livelihoods. Aligning the requirements of this section with

PA10 reinforces the company's responsibility to anticipate, prevent, and mitigate disaster-related risks arising from its operations, ensuring comprehensive protection for affected communities.

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Leading Practice, 1

COMMENT:

In this section, it should be clearly specified that full-scale simulation exercises are to be conducted by three distinct groups, each serving a critical function in validating the effectiveness of the Emergency Preparedness and Response Plan:

Internal company exercise:

Conducted by the company and, where applicable, its contractors, to assess internal readiness, coordination mechanisms, and operational response capacity.

Community-led exercise:

Conducted by the local community and their respective emergency services to evaluate community-level preparedness, communication flows, and the effectiveness of local response capabilities.

Joint full-scale exercise:

Conducted collaboratively by the company, relevant contractors, the community, and their emergency services to test integrated response actions, interoperability, and overall system effectiveness under realistic emergency conditions.

Specifying these three separate exercises ensures that all parties are adequately prepared both individually and collectively, thereby strengthening overall emergency resilience.

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice, 3

COMMENT:

Given that the protection of the right to life is paramount, and that the potential risk is generated by the company's mining activities, it should be explicitly emphasized that: "In cases where local communities lack the economic resources, technical capacity, or professional expertise required to develop adequate Emergency Preparedness and Response Plans (EPRPs), the company should assume direct responsibility for leading the development, implementation, and periodic updating of these plans. Doing so ensures that all stakeholders are effectively protected and that emergency response measures remain robust, inclusive, and fully aligned with regulatory requirements and international human rights standards."

It is neither realistic nor viable for economically disadvantaged rural communities to be expected to finance EPRPs necessitated by large-scale, multimillion-dollar mining operations. The responsibility for ensuring adequate emergency preparedness must rest with the entity that creates the risk and possesses the capacity to manage it.

SECTION: Glossary and Interpretive Guidance

COMMENT:

In this section, it is essential to provide references from the APELL Programme bibliography that document and support its proven methodology.

Bibliographic References with URLs

United Nations Environment Programme. (2015). *APELL awareness and preparedness for emergencies at local level: A process for responding to technological accidents. Second Edition.* UNEP. https://www.preventionweb.net/files/45469_unepawarenesspreparednessemergencie.pdf?startDownload=true

United Nations Environment Programme. (2001). *APELL for mining: Guidance for the mining industry in raising awareness and preparedness for emergencies at local level (Technical Report No. 41).* UNEP. <https://wedocs.unep.org/20.500.11822/8093>

United Nations Environment Programme. (2014). *Commemorating 25 years of APELL: Awareness and Preparedness for Emergencies at Local Level (Brochure).* UNEP. <https://wedocs.unep.org/bitstream/handle/20.500.11822/20988/>

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: 2: Below 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