

CMSI Consultation Response

Respondent Details

NAME

Eduardo Altamirano Aguirre

COUNTRY

Chile

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

Independiente

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 09: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Good Practice, 2

COMMENT:

Sugerencia de incorporación:

2 b) Gestión de Controles Críticos

2 c) *Implementar la vigilancia del ambiente, de la salud de las personas trabajadoras y los exámenes ocupacionales. Si en un lugar de trabajo existe un agente de riesgo que pueda causar una enfermedad profesional, la organización deberá evaluar, dicho riesgo y de acuerdo a sus resultados incorporar y ejecutar un programa de vigilancia ambiental y de la salud de las personas trabajadoras, de conformidad a lo establecido en los protocolos de Salud y a los demás programas establecidos por los organismos gubernamentales nacionales o de referencia internacional.*

En caso de que las personas trabajadoras sean afectadas por una enfermedad profesional, la organización deberá disponer el traslado de estas personas a un puesto en donde no estén expuestas al riesgo que dio origen a dicha enfermedad, sin que esta medida le pueda significar a la persona trabajadora involucrada un detrimento de sus remuneraciones.

2 f) *Sugiero que este apartado este dentro de la letra b; dado que es parte de la Gestión de Controles Críticos.*

TRANSLATION:

Suggested addition:

2 b) *Critical Controls Management*

2 c) Implementation of environmental monitoring, health surveillance of workers, and occupational exams. If a workplace contains a risk agent that may cause an occupational illness, the organization shall evaluate such risk and, based on the results, incorporate and implement an environmental and health surveillance program for workers, in accordance with the provisions of the health protocols and other programs established by national governmental agencies or international benchmarks.

In the event that workers are affected by an occupational illness, the organization shall arrange for the transfer of these persons to a position where they are not exposed to the risk that gave rise to such illness, but this measure cannot be detrimental to the worker's compensation.

2 f) *I suggest that this section be included in item b, since it is part of the Critical Controls Management.*

COMMENT:

Suggested addition:

2 b) *Critical Controls Management*

2 c) Implementation of environmental monitoring, health surveillance of workers, and occupational exams. If a workplace contains a risk agent that may cause an occupational illness, the organization shall evaluate such risk and, based on the results, incorporate and implement an environmental and health surveillance program for workers, in accordance with the provisions of the health protocols and other programs established by national governmental agencies or international benchmarks.

In the event that workers are affected by an occupational illness, the organization shall arrange for the transfer of these persons to a position where they are not exposed to the risk that gave rise to such illness, but this measure cannot be detrimental to the worker's compensation.

2 f) *I suggest that this section be included in item b, since it is part of the Critical Controls Management.*

SECTION: 9.1 Health and Safety Management, Towards Good Practice, 6

COMMENT:

Observación al punto 6.- La organización deberá proporcionar a sus personas trabajadoras los elementos de protección personal adecuados al riesgo, cuando corresponda, los que deberá proveer sin costo.

Los elementos de protección personal deberán utilizarse solo cuando existan riesgos que no hayan podido evitarse o controlarse suficientemente mediante las medidas ingenieriles, técnicas, organizacionales o administrativas.

La empresa minera deberá contar con un procedimiento que considere la utilización y mantenimiento de elementos de protección personal, así como su reposición o el recambio, de conformidad con las especificaciones del fabricante. Tales elementos y equipos deberán cumplir con las normas vigentes de certificación de calidad.

TRANSLATION:

Observation on point 6.- The organization shall provide its workers with personal protective equipment appropriate to the risk, when applicable, and it shall be provided free of charge.

Personal protective equipment should only be used when there are risks that could not be avoided or sufficiently controlled by engineering, technical, organizational, or administrative measures.

The mining company must have a procedure that takes into account the use and maintenance of personal protective items, as well as their replacement or substitution, in accordance with the manufacturer's specifications. Such items and equipment must comply with current quality certification standards.

COMMENT:

Observation on point 6: The organization shall provide its workers with personal protective equipment appropriate to the risk, when applicable, and it shall be provided free of charge.

Personal protective equipment should only be used when there are risks that could not be avoided or sufficiently controlled by engineering, technical, organizational, or administrative measures.

The mining company must have a procedure that takes into account the use and maintenance of personal protective items, as well as their replacement or substitution, in accordance with the manufacturer's specifications. Such items and equipment must comply with current quality certification standards.

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Leading Practice, 0

COMMENT:

Sugiero incorporar:

7. Implementar el proceso de identificación y evaluación de los riesgos laborales presentes en los lugares de trabajo, debiendo proponer la matriz de identificación de peligros y evaluación de los riesgos, considerando los factores de riesgos ergonómicos y de salud mental que considere a lo menos:

- La organización del trabajo*
- Las relaciones interpersonales al interior de la empresa, que incluyen los factores ergonómicos y psicosociales.*
- La violencia y acoso en el trabajo.*

Implementar el proceso de identificación y evaluación de los riesgos laborales presentes en los lugares de trabajo, debiendo proponer la matriz de identificación de peligros y evaluación de los riesgos, considerando los factores de riesgos ergonómicos y de salud mental que considere a lo menos:

- La organización del trabajo*
- Las relaciones interpersonales al interior de la empresa, que incluyen los factores ergonómicos y psicosociales.*
- La violencia y acoso en el trabajo.*

TRANSLATION:

I suggest adding:

7. Implement the process of identifying and evaluating occupational risks present in the workplace, proposing a hazard identification and risk assessment matrix that takes into account the ergonomic and mental health risk factors, considering at least the following:

- Organization of the work
- Interpersonal relationships within the company, including ergonomic and psychosocial factors
- Violence and harassment in the workplace

Implement the process of identifying and evaluating occupational risks present in the workplace, proposing a hazard identification and risk assessment matrix that takes into account the ergonomic and mental health risk factors, considering at least the following:

- Organization of the work
- Interpersonal relationships within the company, including ergonomic and psychosocial factors
- Violence and harassment in the workplace

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Leading Practice, 7

COMMENT:

I suggest adding:

7. Implement the process of identifying and evaluating occupational risks present in the workplace, proposing a hazard identification and risk assessment matrix that takes into account the ergonomic and mental health risk factors, considering at least the following:

- Organization of the work
- Interpersonal relationships within the company, including ergonomic and psychosocial factors
- Violence and harassment in the workplace

Implement the process of identifying and evaluating occupational risks present in the workplace, proposing a hazard identification and risk assessment matrix that takes into account the ergonomic and mental health risk factors, considering at least the following:

- Organization of the work
- Interpersonal relationships within the company, including ergonomic and psychosocial factors
- Violence and harassment in the workplace

SECTION: 9.3 Training, Behaviour and Culture, Good Practice, 0

COMMENT:

Sugiero complementar con lo siguiente:

5.1. - Gestión preventiva en el uso de máquinas, equipos y elementos de trabajo.

La organización deberá de informar convenientemente a las personas trabajadoras expuestas a los riesgos derivados del uso de máquinas, equipos y elementos de trabajo, acerca de su manejo adecuado y seguro, a fin de garantizar que su utilización no constituya un riesgo para quienes las manipulan.

Adicionalmente deberá informar para este mismo fin acerca del contenido sustancial de los manuales, cuando existan, de las instrucciones y las fichas técnicas que hayan proporcionado los fabricantes, importadores y proveedores de máquinas, equipos y elementos de trabajo.

5.2.- Gestión de la seguridad para la operación/conducción de equipos y vehículos móviles.

Solo podrán conducir vehículos y maquinarias motorizadas, las personas que, expresamente, la Administración de la empresa haya autorizado.

El personal designado deberá ser debidamente capacitado sobre la conducción y operación del móvil que debe conducir. Para ello, deberán cumplir con los siguientes requisitos:

- a) Cumplir con los requisitos establecidos por la legislación vigente*
- b) Ser aprobado en un examen Psico-senso-tecnico acorde al equipo o maquinaria;*
- c) Ser aprobado en un examen práctico y teórico de conducción y operación del o los equipos a utilizar;*
- d) Ser instruido y aprobar un examen sobre el "Reglamento de Tránsito" que la Empresa Minera debe tener en funcionamiento.*

TRANSLATION:

I suggest supplementing with the following:

5.1. - Preventive management on the use of machines, equipment, and work items.

The organization shall adequately inform workers exposed to risks resulting from the use of machinery, equipment, and work items about how to properly and safely handle them, in order to ensure that their use does not constitute a risk to those who handle them.

Additionally, it must likewise inform them of the substantial content of the manuals, if they exist, and of the instructions and technical data sheets provided by the manufacturers, importers, and suppliers of machinery, equipment, and work items.

5.2.- Safety management for the operation/driving of mobile equipment and vehicles.

Only persons who have been expressly authorized by the company's management may drive vehicles and motorized machinery.

The designated personnel must be duly trained in driving and operating the mobile equipment they are to drive. For this purpose, they must comply with the following requirements:

- (a) Meet the requirements established by current legislation.*
- b) Pass a psycho-senso-technical examination based on the equipment or machinery;*
- c) Pass a practical and theoretical examination on driving and operation of the equipment to be used;*
- d) Receive instruction and pass an examination on the "Traffic Regulations" that the Mining Company must have in operation.*

COMMENT:

Sugiero incorporar complementando;

6.- Capacitación para la Gestión y divulgación de Controles Críticos:

- a) Identificación de siniestros significativos no deseados (SSND)*
- b) Identificación de los controles para cada SSND, tanto existentes como posibles nuevos controles, incluida la elaboración de un diagrama bow-tie.*
- c) Selección de los controles críticos*
- d) Metodología para la evaluación de desempeño.*

TRANSLATION:

I suggest incorporating these supplements;

6.- Training for the Management and Disclosure of Critical Controls:

- a) Identification of significant undesirable incidents (SSND).
 - b) Identification of controls for each SSND, both existing and possible new controls, including the development of a bow-tie diagram.
 - c) Selection of critical controls.
 - d) Methodology for performance evaluation.
-

SECTION: 9.3 Training, Behaviour and Culture, Good Practice, 1

COMMENT:

Sugiero punto adicional;

1 g) Información de los riesgos laborales. La revalorización deberá garantizar que cada persona trabajadora, previo al inicio de las labores, reciba de forma oportuna y adecuada información acerca de los riesgos que entrañan sus labores, de las medidas preventivas y los métodos o procedimientos de trabajo correctos, determinados conforme a la matriz de riesgos y el programa de trabajo preventivo. Mientras se encuentre pendiente la elaboración de la matriz y el programa, la organización deberá informar los riesgos inherentes a la actividad que realiza.

De igual modo se deberá informar a las personas trabajadoras sobre los riesgos, cada vez que se incorporen a un nuevo proceso productivo, cambien las tecnologías, los materiales o sustancias utilizados.

La información que deba entregar la organización a sus trabajadores y colaboradores que considere a lo menos:

1. Las características mínimas que debe reunir el lugar de trabajo en el que se ejecutarán las labores, entre ellas:

- a. Espacio de trabajo.*
- b. Condiciones ambientales del puesto de trabajo.*
- c. Condiciones de orden y aseo exigidas en el puesto de trabajo.*
- d. Máquinas y herramientas de trabajo que se deberán emplear.*

2. Los riesgos a los que podrían estar expuestas y las respectivas medidas preventivas, incluidos los riesgos y las medidas derivados de emergencias y/o crisis.

3. Los procedimientos de trabajo seguro.

4. Las características de los productos y sustancias que se manipularán, incluyendo el nombre, sinónimos, fórmula, aspecto, olor, así como el modo de empleo, los límites de exposición permisible de esos productos, la forma de almacenamiento y uso de elementos de protección personal, las medidas sobre primeros auxilios y otras que sean procedentes de acuerdo con la normativa vigente, conforme se establezcan en la ficha técnica de seguridad del producto y de etiquetado.

TRANSLATION:

Suggested additional point;

1 g) Information on occupational hazards. The revaluation shall ensure that each worker, prior to starting work, receives timely and adequate information about the risks involved in their work, preventive measures, and proper work methods or procedures, determined in accordance with the risk matrix and the preventive work program. While the development of the matrix and the program is pending, the organization shall report the risks inherent to the activity it performs.

Likewise, workers must be informed of the risks each time they join a new production process or change the technologies, materials, or substances used.

The information that the organization should provide its employees and collaborators should include at least the following:

1. The minimum characteristics that must be met by the workplace where the work will be performed, including:
 - a. Workspace.
 - b. Environmental conditions of the workplace.
 - c. Order and cleanliness conditions required in the workplace.
 - d. Machines and work tools to be used.
2. The risks to which they could be exposed and the respective preventive measures, including risks and measures arising from emergencies and/or crises.
3. Safe work procedures.
4. The features of the products and substances to be handled, including the name, synonyms, formula, appearance, odor, as well as the mode of use, permissible exposure limits of these products, storage method, and use of personal protection items, first aid measures, and other appropriate measures according to the regulations in force, as established in the product's technical safety data sheet and labeling.

COMMENT:

I suggest an additional point:

1 g) Information on occupational hazards. The reevaluation shall ensure that each worker, prior to starting work, receives timely and adequate information about the risks involved in their work, preventive measures, and proper work methods or procedures, determined in accordance with the risk matrix and the preventive work program. While the development of the matrix and the program is pending, the organization shall report the risks inherent to the activity it performs.

Likewise, workers must be informed of the risks each time they join a new production process or change the technologies, materials, or substances used.

The information that the organization should provide its employees and collaborators should include at least the following:

1. The minimum characteristics that must be met by the workplace where the work will be performed, including:
 - a. Workspace.
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 - c. Order and cleanliness conditions required in the workplace.
 - d. Machines and working tools to be used.
2. The risks to which they could be exposed and the respective preventive measures, including risks and measures arising from emergencies and/or crises.
3. Safe work procedures.
4. The features of the products and substances to be handled, including the name, synonyms, formula, appearance, odor, as well as the mode of use, permissible exposure limits of these products, storage method, and use of personal protection items, first aid measures, and other appropriate measures according to the regulations in force, as established in the product's technical safety data sheet and labeling.

SECTION: 9.3 Training, Behaviour and Culture, Good Practice

COMMENT:

I suggest supplementing with the following:

5.1. - Preventive management on the use of machines, equipment, and work items.

The organization shall adequately inform workers exposed to risks resulting from the use of machinery, equipment, and work items about how to properly and safely handle them, in order to ensure that their use does not constitute a risk to those who handle them.

Additionally, it must likewise inform them of the substantial content of the manuals, if they exist, and of the instructions and technical data sheets provided by the manufacturers, importers, and suppliers of machinery, equipment, and work items.

5.2.- Safety management for the operation/driving of mobile equipment and vehicles.

Only persons who have been expressly authorized by the company's management may drive vehicles and motorized machinery.

The designated personnel must be duly trained in driving and operating the mobile equipment they are to drive. For this purpose, they must comply with the following requirements:

- a) Meet the requirements established by current legislation.*
- b) Pass a psycho-senso-technical examination based on the equipment or machinery;*
- c) Pass a practical and theoretical examination on driving and operation of the equipment to be used;*
- d) Receive instruction and pass an examination on the "Traffic Regulations" that the Mining Company must have in operation.*

6.- Training for the Management and Disclosure of Critical Controls:

- a) Identification of significant undesirable incidents (SSND).*
- b) Identification of controls for each SSND, both existing and possible new controls, including the development of a bow-tie diagram.*
- c) Selection of critical controls.*
- d) Methodology for performance evaluation.*

I suggest adding on-site emergency drill programs at least once a year for each facility, for example mines and plants, for all existing personnel.

SECTION: 9.3 Training, Behaviour and Culture, Leading Practice, 0

COMMENT:

La revisión Independiente debiese considerar a los menos las siguientes dimensiones:

- 1. Factores de riesgos presentes en el lugar en el que deban ejecutarse las labores.*
- 2. Efectos en la salud por la exposición a factores de riesgos, para lo que se deberá considerar la información sobre enfermedades profesionales vinculadas a la ejecución de la actividad laboral que se realice.*
- 3. Medidas preventivas para el control de los riesgos identificados y evaluados o inherentes a las tareas encomendadas.*
- 4. Prestaciones médicas y/o económicas a las que tiene derecho la persona trabajadora, de conformidad a las lesiones o enfermedades producto del trabajo, los procedimientos para acceder a ellas, así como el establecimiento asistencial del respectivo, al que deberán concurrir en caso de accidente del trabajo o enfermedad profesional.*
- 5. Plan de gestión de riesgos de emergencia o crisis de la Organización.*
- 6. Prevención de riesgos de incendio, para lo cual se deberá considerar el uso de extintores y otros mecanismos para extinción de incendios.*

TRANSLATION:

The independent review should take into account at least the following dimensions:

- 1. Risk factors present in the place where the work is to be carried out.*
 - 2. Health effects due to exposure to risk factors, considering information on occupational diseases related to the work activity to be performed.*
 - 3. Preventive measures to control the risks identified and evaluated or inherent to the tasks assigned.*
 - 4. Medical and/or economic benefits to which the worker is entitled, based on the work-related injuries or illnesses, the procedures to access them, and the respective health care establishment to which they must go in case of a work-related accident or occupational illness.*
 - 5. The Organization's emergency or crisis risk management plan.*
 - 6. Fire risk prevention, considering the use of fire extinguishers and other fire extinguishing mechanisms.*
-

SECTION: 9.3 Training, Behaviour and Culture, Leading Practice

COMMENT:

The independent review should take into account at least the following dimensions:

- 1. Risk factors present in the place where the work is to be carried out.*
 - 2. Health effects due to exposure to risk factors, considering information on occupational diseases related to the work activity to be performed.*
 - 3. Preventive measures to control the risks identified and evaluated or inherent to the tasks assigned.*
 - 4. Medical and/or economic benefits to which the worker is entitled, based on the work-related injuries or illnesses, the procedures to access them, and the respective health care establishment to which they must go in case of a work-related accident or occupational illness.*
 - 5. The Organization's emergency or crisis risk management plan.*
 - 6. Fire risk prevention, considering the use of fire extinguishers and other fire extinguishing mechanisms.*
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Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Good Practice, 0

COMMENT:

Sugiero complementar:

- 1. Incorporar que la organización minera, en todo caso, deberá adoptar programas de capacitación que guarden directa relación con los tipos de emergencias identificadas en concordancia cuando el riesgo evaluado sea considerado como elevado, alto o grave y/o directamente con los controles críticos.*
- 10. Se sugiere incorporar programas de simulacros de emergencia en terreno a lo menos una vez al año, por cada instalación por ejemplo mina y planta para todo el personal existente.*

TRANSLATION:

I suggest supplementing this:

- 1. Add that the mining organization shall adopt training programs that are directly related to the types of emergencies identified when the assessed risk is considered elevated, high or severe, and/or directly related to critical controls.*

10. I suggest adding on-site emergency drill programs at least once a year for each facility, for example mines and plants, for all existing personnel.

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

COMMENT:

I suggest supplementing this:

1. Add that the mining organization shall adopt training programs that are directly related to the types of emergencies identified when the assessed risk is considered elevated, high or severe, and/or directly related to critical controls.

SECTION: 10.1 Emergency Preparedness and Response, Good Practice, 10

COMMENT:

10. I suggest adding on-site emergency drill programs at least once a year for each facility, for example mines and plants, for all existing personnel.

SECTION: 10.1 Emergency Preparedness and Response, Good Practice

COMMENT:

I suggest adding a point specifically on operating machinery and automotive vehicles/equipment.

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: 2: Below 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