

CMSI Consultation Response

Respondent Details

NAME

Pablo Hamame

COUNTRY

Chile

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

Emere Consulting

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

Emere Consulting considers that the revised version of the Consolidated Standard system represents a clear improvement over the original public consultation version. The updated Standard, Assurance Process, Governance Model and Claims Policy show stronger consistency, clearer performance pathways, and enhanced transparency across all components.

We value the improved alignment between requirements, assurance expectations and claims, as well as the strengthened focus on supply chain responsibilities and prevention of greenwashing.

While some areas could benefit from additional practical examples particularly for complex operational or multitier supply chain contexts the overall revision significantly advances the system's clarity, credibility and usability.

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

Emere Consulting considers that the updated Consolidated Standard system provides a stronger foundation for driving performance improvement globally; however, its overall impact will depend on consistent implementation across regions with varying ESG maturity. While the revised Standard, Assurance Process and Claims Policy enhance clarity and transparency, some requirements may remain challenging for operations in emerging markets or for suppliers that play a critical role in mining value chains.

Also notes that the system would benefit from greater differentiation of expectations based on the size and complexity of operations, ensuring that smaller or less resource-intensive facilities can implement the Standard realistically while still maintaining credibility and ambition. A more scalable approach could support broader adoption without reducing rigor.

Additionally, Emere Consulting observes that further practical guidance particularly for complex supply chain contexts would help strengthen global consistency in performance improvement.

Overall, the system meets expectations and has clear potential to drive improvement, but its global influence will depend on implementation support, scalability considerations and continued refinement.

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

We consider that the Assurance Process largely meets expectations for a robust, credible, replicable, and transparent approach. The process is well-structured, with clearly defined roles, a risk-based methodology, and strong independence and competency requirements for Assurance Providers.

values the emphasis on transparency through publication of Assurance Reports, continual improvement plans, and the inclusion of grievance and oversight mechanisms that reinforce credibility and consistency across jurisdictions.

Also notes the strong protections for workers, stakeholders, and rights holders, as well as the structured timelines and dispute-resolution avenues that support a reliable and repeatable assurance cycle.

To further enhance the approach, the firm suggests adding guidance for facilities operating with complex supply chain arrangements particularly subcontractors and high risk services which may influence assurance consistency.

Document: Standard

QUESTION 1

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

Response: 4: Exceeds expectations

The scope and narrative of the consolidated standard represent a significant improvement in clarity, coherence, and alignment with international best practices for responsible production. The integration of previous requirements into a unified framework reduces operational complexity for sites and strengthens ESG performance traceability.

Emere Consulting notes the following strengths:

- A more intuitive and progressive structure for performance assessment.
- The explicit integration of due diligence, human rights, and governance expectations.
- Strong alignment with global standards (e.g., OECD, ICM, IRMA), which facilitates implementation for multinational mining operations.

Emere Consulting also highlights the strengthened focus on supply chain responsibility, as the consolidated standard increases expectations for contractors and suppliers to operate under responsible production principles. This enhancement is especially relevant given the material ESG

risks associated with fuel supply, logistics, critical inputs, and multi-tier subcontracting common in the mining sector.

To further support consistent application, Emere Consulting recommends:

- Providing clearer guidance on the level of alignment required from critical and strategic suppliers.
- Offering practical examples or tools to help sites demonstrate oversight, monitoring, and continuous improvement across complex supply chains.
- Including illustrative best practices for suppliers of fuels, transportation, critical consumables, and industrial services, which are highly material in Latin American operations.

Overall, Emere Consulting considers the consolidated standard a robust and well-aligned advancement that meaningfully strengthens responsible production practices and enhances supply chain integrity.

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

Emere Consulting considers that the consolidated standard's requirements are generally clear and well structured to support consistent and practical implementation. The improved articulation of expectations, clearer progression of performance levels, and stronger alignment between narrative guidance and measurable criteria contribute to enabling meaningful ESG performance improvement.

Also highlights the positive clarification of supply-chain expectations, which supports more consistent engagement with contractors and suppliers on responsible production.

To enhance clarity further, Emere Consulting recommends offering additional examples for sites with different ESG maturity levels and clarifying requirements involving multi-tier contractor oversight.

Overall, the requirements exceed expectations and provide a solid foundation for reliable implementation and continuous improvement.

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

Emere Consulting considers that the three level performance structure provides a clear and effective framework for guiding continuous improvement. The distinction between Foundational, Good, and Leading Practice is well articulated and enables operations with different maturity levels to identify realistic entry points and progression pathways.

values that the tiered structure helps clarify auditor expectations and supports more consistent benchmarking across sites. This approach is particularly beneficial for operations seeking to advance performance incrementally while aligning with international best practices.

We suggest including a few additional examples or illustrative scenarios to help sites interpret transitions between levels, especially in areas involving supply chain oversight or complex operational risks.

Overall, the three-level structure exceeds expectations and provides a practical, scalable model for driving continuous improvement.

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: 4: Exceeds expectations

Emere Consulting considers that the transparency provided by the Claims Policy generally exceeds expectations. The disclosure of performance scores for each Performance Area, together with aggregated progress indicators and the conditions required for different types of claims, offers a clear and structured system that incentivizes continuous improvement.

Values the strong emphasis on accuracy, traceability, and prevention of greenwashing, as well as the requirement to publicly link all claims to the source information published by the Secretariat. These features enhance credibility and allow stakeholders to interpret performance in a consistent and comparable manner.

Emere Consulting notes that the openness of Self Assessed Results and the clear differentiation between assured and non-assured claims further reinforce transparency, supporting both accountability and ongoing performance improvement.

To strengthen clarity, the firm suggests adding illustrative examples for communicating claims in B2B and public contexts, particularly for regions where ESG literacy varies across stakeholders and supply chain partners.