

CMSI Consultation Response

Respondent Details

NAME

Manuel Schaedler

COUNTRY

Germany

PERMISSION

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

STAKEHOLDER

Government (local / regional / national)

ORGANISATION

BMZ

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: No Response

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: No Response

Document:
Assurance

3. Who Can Conduct External Assurance?

SECTION: General Comment

COMMENT:

The goal should be to obtain accreditation for the standard from independent third-party bodies, rather than relying solely on internal accreditation by the Secretariat. Notably, third-party bodies accredited by national accreditation authorities ensure a transparent, independent, and impartial assurance process. Moreover, it is advisable to collaborate with entities and not individuals, as entities have internal quality processes and division of roles which individuals do not have. This internal control increases the integrity and accountability of the assurance providers.

4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.2 Review and Acceptance of Facility Applications

COMMENT:

When formulating the fee policy, CMSI should consider adopting a fee structure based on the mine site's annual revenue to avoid excluding small and medium-sized enterprises (SMEs).

SECTION: General Comment

COMMENT:

Clarify the extent to which the self-assessed report limits the performance areas or defines the scope to be reviewed by the Assurance Providers during the assurance process.

QUESTION 1

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

Response: No Response

Document:
Standard

Overarching Glossary

COMMENT:

The glossary and interpretive guidance have improved the understanding of key terms such as affected stakeholders, risk-based due diligence, and grievance mechanisms. We recommend specifying these terms to ensure a common understanding of the methods for identifying affected stakeholders, as well as the application of risk-based due diligence and grievance mechanisms. This could be particularly helpful for assurance provider training.

QUESTION 1

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

Response: No Response

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: No Response

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: No Response

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: No Response