

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

United States

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (downstream)

ORGANISATION

Anonymous

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: 2: Below expectations

There are some sections that need strengthening to reference other widely used standards in instances where there may not be regulations, we have tried to indicate these in the specific comments. Majority meets expectations, but this needs to be reviewed.

Document:
Assurance

2. Roles and Responsibilities

SECTION: D. National Panels

COMMENT:

This may be a future goal, but it would be good to have the board and/ or secretariat work to help establish national panels in places where mining is very prevalent

QUESTION 1

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

Response: 3: Meets expectations

Overall the assurance process is well laid out and meets expectations. However there is a concern over the lack of differentiation between minor/ major non-conformances (appreciate the critical notifications for areas that may present imminent danger/harm, may want to expand these criteria a bit to include this description). Concern over lack of min/ maj conformance distinction stems from creating a lack of prioritization based on risk. The initial 30 days for CAPs indicate mostly "low hanging fruit" to improve (policy/ procedure updates), but then it is unclear which performance areas to prioritize for building the next level should be focused on. I think creating a mechanism for prioritization based on risk for the CAPs would strengthen the assurance process significantly and create more value and credibility to stakeholders. Adding in a major non-conformance compared to a minor can help this, or incorporating a risk matrix by which to prioritize performance to each risk could help a site prioritize which to implement (i.e if there's no high risk of child labor but is a high risk for environmental management for impact to community, both have non-conformances, but addressed to the impact to community due to the ACTUAL contextual risk is important. If misunderstood -please clarify this in the assurance document on how this is done.

Document:
Standard

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Good Practice, 3

COMMENT:

Agree, would add that the sustainability metrics should also cover performance areas to and indicate criteria for what is considered meaningful metrics to achieve continuous improvement. Metrics should include all sites and roll up if they are being reported at the corporate level. Criteria for "sites" included in the metric can be established.

SECTION: 1.1 Corporate Accountability, Leading Practice, 1

COMMENT:

If TGP and GP are strengthened to indicate more criteria around site policies and metrics, this is ok

SECTION: 1.1 Corporate Accountability, Towards Good Practice, 1

COMMENT:

add that it has been cascaded to sites

SECTION: 1.2 Sustainability Reporting, Good Practice, 1

COMMENT:

Report should cover performance areas at least, to the TGP point, an annual report is important it should also indicate which sites are included against the standard as part of the disclosure. Indicate, at least in guidance what international standards are "acceptable".

SECTION: 1.2 Sustainability Reporting, Leading Practice, 2

COMMENT:

Agree if TGP and GP are strengthened, would like to see more indication of how sites are prioritized for assurance against the DMA.

SECTION: 1.2 Sustainability Reporting, Towards Good Practice, 1

COMMENT:

What should risks and impacts be based on, some basic criteria is needed to understand risks and why they are included.

SECTION: 1.4 Risk Assessment, Good Practice, 1

COMMENT:

Mitigation /prevention plans should be incorporated at this step at least for the highest risks

SECTION: 1.4 Risk Assessment, Leading Practice, 1

COMMENT:

Rights holders should be engaged in TGP step, otherwise how do you know you are assessing the risk appropriately, if you wait until this step to assess risk, it is likely to result in issues at the site. Adding engagement at the LP stage significantly reduces the credibility and strength of this standard.

SECTION: 1.4 Risk Assessment, Towards Good Practice, 2

COMMENT:

More detail around which types of risks, how are they established based on what? There should be criteria that lays out assessments as a first step that creates a credible risk assessment and can help prioritize. Using things like ESIA, a human rights and environment due diligence assessment by a credible independent party, a first step should be to conduct. While an individual should be responsible for this role... they should not be responsible for determining the risks without following a set of criteria or methodology or having insight from a credible independent auditor to work with the individual.

SECTION: 1.5 Corporate Crisis Management, Towards Good Practice, 1

COMMENT:

Is there a framework to reference here? What makes a credible response plan (UNEP APELL?) , would also include engagement with workers and communities and or if Indigenous Peoples' if impacted for understanding what the company is doing to manage crisis response.

SECTION: 1.5 Corporate Crisis Management, Towards Good Practice

COMMENT:

Consultation with communities and indigenous peoples should be included in towards good practice to ensure trust is built from the beginning.

Performance Area 02: Business Integrity

SECTION: 2.1 Legal Compliance, Good Practice, 2

COMMENT:

Corrective actions should include a severity/impact rating (financial/ environment/ social, etc) and closure guidelines

SECTION: 2.1 Legal Compliance

COMMENT:

Add specific metrics be suggested here that are industry proven to indicate trends towards non-compliance, alerts at the site and/ or corporate oversight?

SECTION: 2.1 Legal Compliance, Towards Good Practice, 1

COMMENT:

add "to identify " ... and comply

SECTION: 2.2 Business Ethics and Accountability, Good Practice

COMMENT:

Should state processes shared and accessible, and employees are trained at a site level.

SECTION: 2.2 Business Ethics and Accountability, Leading Practice, 4

COMMENT:

What determines what is substantiated? There is no reference in TGP /GP to establish an investigation process into grievances that will enable substantiated or unsubstantiated complaints. Strengthen these 2 levels of performance to create more credibility.

SECTION: 2.2 Business Ethics and Accountability, Towards Good Practice, 4

COMMENT:

Define "workers" and what they include, Code of conduct should be applicable to contracted services for labor, etc.

4. Is #4 a "grievance mechanism"? Why isn't this called out as one.

What about allowance of "facilitation" payments ? Include in TGP.

Performance Area 03: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Good Practice, 6

COMMENT:

Remove "Where appropriate", this leaves a loophole for those who will not engage, if the criteria is met (as is explained), they should play a (an appropriate) role in remediation

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Leading Practice, 4

COMMENT:

Report and/ or monitor effectiveness of collaboration efforts

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Towards Good Practice

COMMENT:

Include more descriptors for "responsible business conduct" and identify risks at this stage

Is the "system to screen suppliers for compliance", the early warning system in GP? If so, call it that so the 2 items are connected and building off each other.

SECTION: 3.2 Responsible Mineral Sourcing, Leading Practice

COMMENT:

What about traders? (aligns with EUBDD) if traders are used , could be applicable if there's a processor on site and there are tolling agreements

SECTION: 3.2 Responsible Mineral Sourcing, Towards Good Practice, 2

COMMENT:

A caveat to add, if a supplier is directly sourcing from a CAHRA they should implement a supply chain due diligence management system for those specific suppliers, then expand.

Performance Area 04: New Projects, Expansions and Resettlement

SECTION: 4.1 Environmental and Social Impact Assessments, Good Practice, 1

COMMENT:

Why avoid if possible, what determines possible, should there be a hierarchy for risk mitigation, where all necessary actions should result in avoidance, what about including if indigenous peoples' or FPIC is required ? These consultations should be made if identified if cultural heritage is impacted in certain cases, and stem from the consultations in TGP requirements. For example step 3 should be first and then step 2 and then 1 using an avoidance hierarchy. Traditional knowledge should also be incorporated in TGP/ GP steps as part of the ESIA,

SECTION: 4.1 Environmental and Social Impact Assessments, Towards Good Practice, 1

COMMENT:

More specificity is needed for "baseline env, social, cultural and economic context" ... What baseline information is needed, soil, biodiversity, communities, water levels, water pollution, air quality, emissions, noise & vibration etc. ... this appears to be part of the ESIA requirement but not the baseline information?

SECTION: 4.1 Environmental and Social Impact Assessments, Towards Good Practice

COMMENT:

Overall missing a scoping step in the beginning (TGP/GP) that would help inform the ESIA, collaboration requirement during leading practice should indicate a consultation period on the final draft of ESIA for rights-holders/ communities.

SECTION: 4.2 Land Acquisition and Resettlement, Leading Practice, 3

COMMENT:

Should there be a timeline for how long to disclose / monitor, or what indicates success?

SECTION: 4.2 Land Acquisition and Resettlement

COMMENT:

If physical or economic displacement is unavoidable, the company should be practicing at the Leading Practice level, ALL of these steps should be incorporated throughout the process, this is an overall concern with the way the standard is drafted in some instances (where peoples' lives are fully impacted). TGP is not good enough, neither is GP, if it was applied at certain stages relative to the project this would make sense, but a company doing only TGP for resettlement without intention of GP or LP later is concerning.

SECTION: 4.2 Land Acquisition and Resettlement, Towards Good Practice

COMMENT:

"Voluntary" displacement/ transactions or temporary transitional resettlement be addressed as well to ensure they are managed ethically (for example this should also be based on the socio-economic studies and fair prices should be offered that consider livelihood / lifestyle impact -even if voluntary, in some cases even voluntary can be mis-managed and people are bought out "cheaply" and the impact to their lives are not considered fully .

Performance Area 05: Human Rights

SECTION: 5.1 Human Rights, Good Practice, 1

COMMENT:

Agree, human rights due diligence process should actively identify, prevent, mitigate, and account for human rights risks and impacts, extending to the supply chain. Alongside this, critically assess and enhance the grievance mechanism to ensure it meets UNGP effectiveness criteria.

SECTION: 5.1 Human Rights, Leading Practice

COMMENT:

Sets clear, measurable human rights objectives and targets across the operations and supply chain

Overall require a formal review and corrective action process, including triggers for external monitoring if the entity fails to prevent/remediate impacts

SECTION: 5.1 Human Rights, Towards Good Practice, 1

COMMENT:

1. should establish a robust, publicly accessible human rights policy

2. clearly define the scope of the human rights risk assessment to include all relevant entities, such as facilities, suppliers, and contractors

Include a scoping process to analyze the human rights context and map rights-holders before the main risk assessment.

Performance Area 06: Child and Forced Labour

SECTION: 6.1 Prevention of Child and Forced Labour, Good Practice, 2

COMMENT:

Add that contractual requirements for all business partners to prevent child and forced labor should be extended to contractors and enforced.

SECTION: 6.1 Prevention of Child and Forced Labour, Leading Practice

COMMENT:

Incorporate prohibitions within broader, more detailed Human Rights Due Diligence (HRDD) and Supply Chain Due diligence framework/ risk assessments.

SECTION: 6.1 Prevention of Child and Forced Labour, Towards Good Practice

COMMENT:

Establish a clear, publicly communicated policy against child and forced labor, explicitly aligned with UNGPs and ILO Conventions, and conduct a comprehensive risk assessment. This assessment should cover the entire operation (including supply chain), focusing on enforcement for contractors, and essential training for PUR and HR staff.

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Towards Good Practice

COMMENT:

This policy must specifically address the fair treatment and advancement of women and other vulnerable groups, clearly stating the facility's commitment to identify and reduce any barriers they face. Employee awareness (all levels) and training should be included internally. Reference to the grievance mechanism should also be correlated here, as it should be part of TGP at a basic level.

Performance Area 08: Diversity, Equity, and Inclusion

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level)

COMMENT:

nly comment across DEI is that it should align or include hiring from local communities, or Indigenous peoples' there should be reference to this to indicate that this is what DEI should include, and if education is needed providing opportunities to upskill within communities as needed to foster a work force that reflects the community they impact, globally, socioeconomic disparity is what creates a diverse population, it is very different

than in the US/ Canada or maybe even the EU where populations are more diverse by race, ethnicity, religion, sexual orientation or gender identification. This standard should consider the global context for diversity.

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Leading Practice

COMMENT:

Recommend reference at this level that there is a robust H&S management system in place, certification to ISO 45001 (or internationally recognized equivalent)

SECTION: 9.1 Health and Safety Management, Towards Good Practice, 3

COMMENT:

How do you adopt risk controls if you haven't completed a risk assessment of the risks and hazards? Risk assessment should be part of this initial process. This will help prioritize having controls in place for highest risks at a minimum.

This is also critical to child labor to assess risk at this level to ensure no one under the age of 18 is completing these jobs. Certain "hazards" at this stage should include a determination of age limits, but again, a risk assessment process would help determine this. Either way recommend at the very least, identify hazards that can't be performed by anyone under 18 (i.e. if hazardous materials, etc)/

SECTION: 9.2 Psychological Safety & Respectful Workplaces

COMMENT:

Overall recommend expanding beyond psychological safety, respectful behavior to physical safety in TGP, GP and LP.

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Towards Good Practice, 1

COMMENT:

Appreciate the focus on psychological safety and respect, but at this stage the grievance mechanism and / or management system should also have a way to report safety concerns without fear of retaliation and can be submitted anonymously if needed.

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Towards Good Practice

COMMENT:

Overall this Performance area doesn't seem to place an emphasis on occupational health and safety, this should be incorporated more robustly into the TGP steps to include risks for specific roles and monitored accordingly to national / or international standards.

SECTION: 9.3 Training, Behaviour and Culture, Leading Practice

COMMENT:

Develop KPIs that measure who, what, where and frequency of training based on risk, those that have high-risk jobs should be trained more frequently, and there should be an annual safety training for anyone on site at the mine.

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

COMMENT:

Add "safety and health hazards" of specific roles, training should be both general (to requirements, reporting mechanisms, etc) to job specific, and include any hazards of others that they may encounter.

SECTION: 9.4 Monitoring, Performance and Reporting, Good Practice, 4

COMMENT:

Frequency of "reviews" should be determined according to risk. A review every 5 years is not acceptable.

SECTION: 9.4 Monitoring, Performance and Reporting, Towards Good Practice, 1

COMMENT:

If targets are not met, what happens, often employees won't report if there are negative consequences to reporting, safety violations should be able to be reported without fear of retaliation (could be anonymous) and management / workers can work to collaboratively work to solve the issue without blame or consequence as a way to mitigate risky behavior. This whole PA needs to reference the grievance mechanism to include requirements of no retaliation in the case of reporting safety hazards or unsafe working conditions or practices.

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Good Practice

COMMENT:

Aligned if TGP improvements are made

SECTION: 10.1 Emergency Preparedness and Response, Leading Practice

COMMENT:

Recommend to structure requirements around UNEP APELL framework so leading practice is reflective of a systemic approach . Also missing from this entire performance area is remedy efforts , there should be reference to if emergency or crisis leads to harmful impact to workers, community, etc company has resources allocated and a commitment to participate in the remedy / recovery of communities. (thinking of the Brazilian damn failure or issue with tailings breaches in Indonesia), company should be responsible for remediation

SECTION: 10.1 Emergency Preparedness and Response, Towards Good Practice

COMMENT:

Add coordinate with local authorities (as applicable) for resources (determine when they may need to be engaged and how) in some cases there may need to be evacuation etc.

Also add here assign accountable department/ leader to implement the EPRP

Performance Area 11: Security Management

SECTION: 11.1 Security Management, Leading Practice

COMMENT:

Consider that the company is responsible for also conducting training or at least ensuring monitoring that training is done and is appropriate, its one thing to require, but this would help enforce, especially in cases where there are real security risks.

Performance Area 12: Engagement

SECTION: 12.1 Engagement, Leading Practice

COMMENT:

Would add on the point of accessibility, and gaging effectiveness of engagement can a measure be put in place that shows that engagement is helping foster and improve community sentiment, and this is considered in continuous improvement plan

SECTION: 12.1 Engagement, Towards Good Practice

COMMENT:

Generally create a more process-oriented, breaking down the requirements into Stakeholder Mapping, Engagement Plan, Information Sharing Processes, Implementation, Capacity Strengthening, Monitoring, and Continuous Improvement. Emphasize collaborative design and review of the engagement process itself. requires a system to assess stakeholder capacity to engage and to mutually agree on strategies to remove barriers.

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Community Impact Management, Good Practice, 1

COMMENT:

Base this on ESIA mitigation, should develop and implement collaborative action plans to avoid, minimize, or mitigate these impacts, and rigorously monitor their effectiveness, paying special attention to how vulnerable populations are affected, this should be part of the social scoping / or risk assessment process in TGP level

SECTION: 13.1 Community Impact Management, Leading Practice

COMMENT:

add engage with remediation when required

SECTION: 13.1 Community Impact Management, Towards Good Practice, 1

COMMENT:

Is it required a social risk assessment or social scoping study? Would add that the risk identification should be done by an independent competent consultant, for ESIA/ Scoping, Community impact, and this should be critical to the entire ESG management system performance.

SECTION: 13.2 Community Development and Benefits, Good Practice, 9

COMMENT:

Specify that disclosure should be at a facility level to show local impact.

SECTION: 13.2 Community Development and Benefits, Towards Good Practice, 1

COMMENT:

1. provide local people with access to employment and contracting opportunities, 2. CSR projects to develop local economic

3. this concept should be reference in DEI as well and socioeconomic diversity should be included for both of these Performance areas.

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Indigenous Peoples, Good Practice, 9

COMMENT:

Remove as relevant (or add what determines relevancy) (TGP and TP comment). Appreciate the concept of remedy incorporated here. Strengthen TGP... around the FPIC process and aligned.

SECTION: 14.1 Indigenous Peoples, Leading Practice

COMMENT:

Develop a formalized FPIC process/ system in as a leading practice in line UNDRIP Framework or other credible sources (SIRGE). This should be done in consultation with impacted IP.

SECTION: 14.1 Indigenous Peoples, Towards Good Practice

COMMENT:

First step in the process would be to conduct an IP risk assessment (as part of ESIA/ scoping process etc. at the onset of project planning if greenfield, as part of ongoing activities if longstanding mine, or if new activities to an existing project. #7 Would add if contact is made, halt activities and consult on how to avoid or change plans. Add that identification of uncontacted peoples needs to be part of the ESIA as well, especially in places where there is known to be uncontacted indigenous people

Support for engagement (if needed should be part of TGP) .

2. communities locals should be consulted too (are they the relevant authorities)

Should a definition/guideline of what constitutes IP according to IP NGOs?

5. who is determining what significant adverse impact is, consider referencing IFC PS7 for following FPIC. Recommendation: where such impacts are unavoidable obtain agreement with affected IP through a process demonstrating FPIC aligned with IFC PS7.

Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage, Good Practice, 1

COMMENT:

If there is risk of adversely impacting cultural heritage, engagement should be in towards good practice, damage could already be done if this isn't a basic principle in TGP.

SECTION: 15.1 Cultural Heritage, Leading Practice

COMMENT:

Would recommend incorporating remediation into leading practice if impact has been made at TGP or GP phases. Putting in recommendations in TGP may reduce impact later on.

SECTION: 15.1 Cultural Heritage, Towards Good Practice

COMMENT:

Add that anytime activities are undertaken there is a IP representative on site to help oversee the activities are done in accordance with the agreement (Siting the Aust, Rio Tinto incident), in consultation with IP and agreement for their support if traditional knowledge is incorporated (there may be another way) to reduce impact if IP are consulted in the project in certain jurisdictions.

Performance Area 16: Artisanal and Small-Scale Mining

SECTION: 16.1 Artisanal and Small, Scale Mining (ASM), Good Practice

COMMENT:

Move assess risks and impacts to TGP

SECTION: 16.1 Artisanal and Small, Scale Mining (ASM)

COMMENT:

Incorporate ASM development into community development plan? It would help to connect these two concepts.

SECTION: 16.1 Artisanal and Small, Scale Mining (ASM), Towards Good Practice

COMMENT:

Define the nuances around legitimate ASM in the guidance particularly in the context of cobalt and the DRC. Why not identify risks in the TGP stage , If not included it could undermine the overall HRDD process or impact scoping, or ESIA assessment process

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Leading Practice

COMMENT:

Add timing to public disclosure (annually). Better incorporate or integrate grievance mechanism requirements across other performance areas (this will help with auditing as well, b/c you may want to ensure you GM has

the specific requirements and that the specific SMEs are aware of and receive information that they can then incorporate into their (ex. annual) risk assessments.

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Towards Good Practice, 6

COMMENT:

What if there is lack of regulatory compliance requirements? Is there an international standard that can be referred to here to inform water monitoring? Would IFC performance 3 be appropriate here?

SECTION: 18.2 Collaborative Watershed Management

COMMENT:

What are the criteria to determine IWRM is mature or not ?

SECTION: 18.2 Collaborative Watershed Management, Towards Good Practice

COMMENT:

What are the criteria to determine IWRM is mature or not ?

It appears that "impacts" the watershed is missing in this entire performance area, this should be included in the ESIA and mitigation and remedy should be part of the management plan,

SECTION: 18.3 Water Reporting, Leading Practice

COMMENT:

Update to include a more detailed management cycle for water, including a specific "Water Management Plan," annual monitoring and review, and a formal continuous improvement process. Appreciate the collaborative monitoring approach.

COMMENT:

Incorporate remedy actions if negative impacts are identified (pollution), or in the monitoring stages.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

In general, the performance indicator needs to be strengthened to create a formal Biodiversity Management Plan as a leading practice, and this should be incorporated into a cycle plan . Recommend reference to alignment with IFC PS6 as well . Incorporate PA 22 impacts into this PA, connect the two more explicitly. Missing remedy concept, to be consistent "adjustments" should be also inclusive of continuous improvements.

Performance Area 22: Pollution Prevention

SECTION: 22.2 Mineral Wastes, Leading Practice

COMMENT:

No specific design/safety factors designated for construction nor referenced standard, add in to strengthen at a leading practice.

SECTION: 22.6 Accidental Polluting Releases

COMMENT:

What would be termed "significant" should encourage or require investigation/cleanup of all accidental releases. That's true best practice.

SECTION: 22.7 Noise, Vibration and Light Pollution/Nuisance

COMMENT:

Make a clear connection here between noise/ vibration on biodiversity, and incorporate this into PA 19

COMMENT:

Only basing levels off of permitted requirements may cause a problem. Many places do not regulate these items. Not appropriate for global applicability. Find a standard to reference that is globally applicable or set out requirements if permitted requirements are not regulated.

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy for all Facilities, Towards Good Practice

COMMENT:

Good at the leading practice level, need to strengthen TGP and GP levels.

SECTION: 23.2 Additional Requirements for Smelters, Towards Good Practice

COMMENT:

Good at the leading practice level, need to strengthen TGP and GP levels. Adding in targets/ monitoring, look at waste hierarchy ...

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Leading Practice

COMMENT:

Add more specificity around what should be included in the reclamation cost estimate (labor, management, contingency, water management post closure, land reformation, revegetation etc)

QUESTION 1

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

Response: **2: Below expectations**

At the leading practice level yes, there are concerns over the structure at the lower levels for some topics. For many topics assessing risks as TGP needs to be strengthened so that GP and leading practice implementation is risk based and prioritizes actions, remedy seems to be a missing from many topics (addressed in comments) .

For companies and their customers to have the strongest risk mitigation, standards should primarily be applied at the facility level with the facility demonstrating corporate policy at the facility level. This ensures that controls and processes are tailored to the specific operational context, site conditions, and local stakeholder environment. Corporate-level requirements should focus on establishing overarching policies, ensuring accountability, and providing the necessary governance and resources to support robust facility-level implementation if corporately set. Employees at a site level need to be trained on expectations set at a corporate level and there should be evidence of this.

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

Requirements are clear and support consistent implementation, however due to lack of risk assessment and remedy this is a barrier to achieving necessary performance improvement. For existing mines, in order for long-time operating mines to conduct appropriate impact/risks assessments the standard allow for the completion of targeted risk and impact assessments rather than mandating a full, new Environmental and Social Impact Assessment (ESIA). This approach would help prioritize and strengthen mitigation strategies where the highest impacts and risks are present, offering a more efficient pathway to improving performance at established operations.

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

No, there are several areas that should be based on risk and impact assessments in order to implement and prioritize TGP and GP levels, specifically where indigenous peoples, communities, and environmental impact intersect. There are also some areas where engage should be happening at the TGP stage. On A granular level, The performance areas sometimes seem to be missing the concept of continuous improvement and remediation as an embedded leading practice. We recommend that a "Plan-Do-Check-Act" cycle, including monitoring, review, and corrective action, be a foundational component of all performance areas, not just an optional or higher-level requirement. This ensures that management systems are dynamic and capable of adapting to new information and changing conditions.

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