

CMSI Consultation Response

Respondent Details

NAME

Mansour Edraki

COUNTRY

Australia

PERMISSION

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

STAKEHOLDER

Academia

ORGANISATION

Not Specified

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 22: Pollution Prevention

SECTION: 22.2 Mineral Wastes

COMMENT:

Towards Good Practice:

Identify mineral waste streams and whether opportunities exist to avoid and reduce the amount of mineral waste generated, and reuse or recycle residual mineral waste.

This doesn't really apply to waste rocks. INAP reports show about 70-80% of the load of AMD on mine sites comes from waste rock piles, not tailings or mine workings/voids.

Good practice:

Construct, maintain and rehabilitate mineral wastes to achieve safe, stable and non-polluting landforms.

Some level of fundamental detail could have been included; for example, technically verifiable approaches for characterisation and classification, modelling and field trials, construction (avoidance of end-dumping), maintenance and monitoring, and consideration of climate and closure objectives.

Leading Practice: Collaborate with affected stakeholders in the development of actions to address identified risks of adverse impacts from mineral waste proportionate to the level of risk of harm to human health and the environment.

this could include: Preventing harm to human health and the environment through life of mine planning, segregation, selective placement, and base-up construction strategies for mineral waste, in view of post-mining land use opportunities.

COMMENT:

The standard generally lacks critical details required for AMD (ARD/ML) management specific to waste rocks.

Some level of design requirements, construction, operational control, monitoring and adaptive management strategies could have been included.

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

Lacks critical some details

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