

# CMSI Consultation Response

## Respondent Details

NAME

Anonymous

COUNTRY

China

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Assurance provider/auditor

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: 3: Meets expectations

Document:  
Assurance

## 2. Roles and Responsibilities

SECTION: B. Assurance Providers

COMMENT:

*It says on page 8 that "Participate in the Assurance Oversight Process when requested by the Secretariat or a Facility representative.". What is "Assurance Oversight Process" meant as there are "Assurance Provider Oversight Process" listed on Page 40. Please use the same wording to avoid misunderstanding.*

SECTION: C. The Secretariat

COMMENT:

*On Page 9, "Maintain and operate a dispute resolution process to address any disagreements on conclusions arising from the Assurance Process between the Facility and the Assurance Provider." Recommend to capitalizing "dispute resolution process" to keep consistency with previous pages,*

## 4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.13 External Stakeholder and Rights

COMMENT:

*On page 25, it says that "The Assurance Provider should also provide each interviewee with information on how to contact the Consolidated Standard Grievance Mechanism should they have any concerns they wish to raise regarding the process and their involvement in it."*

- Do interview workers require to be included?*
- Are there any requirements on the communication of the Consolidated Standard Grievance Mechanism*
- Will CMSI prepare a grievance mechanism document or poster with email, telephone and/or QR code etc so that the AP can directly share and communicate with all related interviewees in the future?*

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SECTION: 4.2 Planning

COMMENT:

*It is listed on Page 15 Figure 1 that the minimum timeline are within 3 months of the commencement date for self-assessment, while Page 16 (4.2.2) says "The Facility will have 3-6 months from the commencement date to submit an initial self-assessment report" and Page 17 (4.2.4) says "The first Self-Assessed Report must be submitted to the Secretariat within 3-6 months of the Facility's commencement date.". Please confirm the timeline to ensure consistency.*

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COMMENT:

*It says on Page 16 (4.2.2) that 15 months from the commencement date to complete the Assurance Process and publish the Assurance Report while it says publish the report within 12 months from the commencement date in Page 15 Figure 1. Please confirm the timeline to ensure consistency.*

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SECTION: 4.3 Execution of Facility Assessment, 4.3.3 Interviews

COMMENT:

*It says on page 29 that "The Assurance Provider will execute the interview plan for both workers and stakeholders and rights-holders during the execution phase of the assurance engagement. Interviews are to be conducted in person wherever possible, in accordance with Sections 4.2.10, 4.2.11 and 4.2.12". It should be 4.2.11, 4.2.12 and 4.2.13.*

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SECTION: 4.5 Reporting

COMMENT:

*It says on page 34 that "In addition to the Assurance Report, the Assurance Provider is required to maintain working papers that include completed assessment checklists." Will the checklist be provided as an assurance toolkit for AP, or will it need to be established by each AP?*

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## Appendices

SECTION: C. Table of Activities and Deadlines for Facilities

COMMENT:

*The deadline for "Submit 1st Self-Assessed Report" and "Conduct Facility site-visit" is inconsistent with the figure on page 15.*

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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

## Introduction

COMMENT:

*On the Page 9, the subject of the sentence below is duplicated: "the Facility's the independent assurance provider is required to review the rationale provided as part of the Assurance Process". It is suggested to delete "the Facility's"*

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## Performance Area 03: Responsible Supply Chains

SECTION: 3.2 Responsible Mineral Sourcing

COMMENT:

*Please confirm whether 3.2 is not applicable if there is no external sourcing.*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*On page 32, there is a definition for High or very high risk in the Glossary and Interpretive Guidance, while it is not mentioned in PA3. Please check if any content is missing in PA3*

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## Performance Area 04: New Projects, Expansions and Resettlement

SECTION: Applicability

COMMENT:

*On Page 35, there is a duplicate "a range of" in "Note: table does not include other PAs which cover a range of a range of social/environmental impacts/benefits". Please delete "a range of".*

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## Performance Area 05: Human Rights

SECTION: Applicability

COMMENT:

*On Page 42, it says that where the requirements of two Performance Areas are the same or similar, the intent is that they are implemented as one. If any findings are noted, should they be raised in all applicable PAs or one PA?*

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## Performance Area 06: Child and Forced Labour

SECTION: 6.1 Prevention of Child and Forced Labour, Good Practice, 5

COMMENT:

*On the page 48 #5, in towards Good Practice: Where forced labour, including child labour and modern slavery risks have been identified provide relevant training on those risks for employees who are responsible for managing procurement and human resources at defined intervals for employees who are responsible for human resources and procurement. There is duplicated for "employees who are responsible for human resources and procurement".*

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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: 3: Meets 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

### 3. Claims

SECTION: 3.1 Types of Claims, 3.1.2 Assured Claim

COMMENT:

*In 3.1.2 Assured Claim says "The Assured Claim can be made by a Facility as soon as the Facility's first Assurance Report has been published on the Consolidated Standard's website, no later than 15 months following the Commencement Date". However, CMSI Assurance Process Page 16 (4.2.2) says 15 months from the commencement date to complete the Assurance Process and publish the Assurance Report while it says publish the report within 12 months from the commencement date in Page 15 Figure 1.*

*Please confirm the consistent timeline and please consider the rationality of the timeline, for instance, if publish the Assurance Report 15 months from the commencement date but no later than 15 months to make an assured claim.*

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COMMENT:

*In the 3.1.2.1, Aggregated Score says "The aggregated score may be updated following implementation of the medium-term corrective actions, if assured by the Assurance Provider), or ...". There is an unmatched bracket. Please delete the unmatched bracket*

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SECTION: 3.2 Self

COMMENT:

*In 3.2, Self-Assessed Results says that "A Facility's first Self-Assessed Report, which must be submitted within 3-6 months of its Commencement Date, is not published.". Please confirm the timeline.*

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*In 3.2, Self-Assessed Results says that "A Facility's first Self-Assessed Report, which must be submitted within 3-6 months of its Commencement Date, is not published.". Please confirm the timeline.*

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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