CMSI Consultation Response

Respondent Details

NAME
Anonymous

COUNTRY
Australia

PERMISSION
Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER
Consultancy

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: No Response

Original version was not commented on by me.

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

A matrix to demonstrate where each performance Area overlapped with the intent of the other international standards it is consolidating will be useful to show "where and how" this standard is meeting the needs and expectations for driving improvement from existing standards across the industry.

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

The methodology is consistent with other processes.

Will an electronic reporting database be available to support reporting and trend analysis overtime?

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Good Practice

COMMENT:

Ensure there is an alignment of corporate strategy and decision-making processes with sustainable development, including design criteria, lifecycle and change management.

SECTION: 1.4 Risk Assessment, Good Practice

COMMENT:

Ensure a level of risk review and assessment is conducted as part of Change management processes and analysis.

SECTION: 1.4 Risk Assessment

COMMENT:

There is not a reference for the need to have a documented risk management process / framework (or plan) to be developed as part of site management systems and support standardisation of methodology.

This should be a requirement to provide guidance on assessment, ranking, notifications, review, application of mitigation hierarchy, validation of effectiveness of controls, ALARP etc in-line with ISO requirements.

Performance Area 04: New Projects, Expansions and Resettlement

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

COMMENT:

Implement project design changes and operational controls based on the

results of the ESIA to avoid impacts and optimise benefits where possible.

By adding "optimise benefits" here, this can prompt and support design and controls to look at positive impacts or alternatives such as renewables, treatment technologies, and follow-up with 4.1.3 with the addition of improvement action plans aligned with leading practices, innovation and changing conditions.

SECTION: 4.1 Environmental and Social Impact Assessments, Good Practice, 3

COMMENT:

and / or improvements / opportunities for identified benefits.

(Noted Community Benefits are in 13.1, Environmental / ecological opportunities / benefits aren't addressed)

Performance Area 06: Child and Forced Labour

SECTION: Intent

COMMENT:

Expand on ILO (International Labour Organization) Conventions

It is the first time it is introduced; acknowledge it's in the Glossary below.

Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage, Good Practice, 5

COMMENT:

Ensure the Chance Find procedure is communicated to workers and contractors on the "why, when and how" the process should be followed.

(Can include in leading practice training requirements too - however needs to be communicated as part of good practice requirements first).

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Towards Good Practice, 5

COMMENT:

Validation of controls to ensure water management controls are routinely reviewed and are effectively controlling the risks (as identified in ESIA / Risk Register or Assessments).

SECTION: 18.3 Water Reporting, Towards Good Practice, 1

COMMENT:

e) Water Quality Criteria used to report against - (i.e drinking water / aquatic standard / EPA / Baseline Data limit / combination of the above etc)

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Towards Good Practice, 3

COMMENT:

Include prohibitions for any land clearing, regardless of area, without review and following a process for land clearance approvals.

Performance Area 20: Climate Action

SECTION: 20.2. Climate Change Management (Facility Level), Good Practice, 5

COMMENT:

Validation of controls to ensure air quality & emissions management controls are routinely reviewed and are effectively controlling the risks (as identified in ESIA / Risk Register or Assessments).

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management

COMMENT:

Validation of controls to ensure waste management controls are routinely controlling the risks (as identified in ESIA / Risk Register or Assessments).

SECTION: 22.2 Mineral Wastes, Good Practice, 2

COMMENT:

Validation of controls to ensure mineral waste management controls are routinely reviewed and are effectively controlling the risks (as identified in ESIA / Risk Register or Assessments).

SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

Validation of controls to ensure air and emissions management controls are routinely reviewed and are effectively controlling the risks (as identified in ESIA / Risk Register or Assessments).

SECTION: 22.6 Accidental Polluting Releases, Good Practice, 1

COMMENT:

Validation of controls to ensure pollution prevention controls are routinely reviewed and are effectively controlling the risks (as identified in ESIA / Risk Register or Assessments).

SECTION: 22.7 Noise, Vibration and Light Pollution/Nuisance, Good Practice, 3

COMMENT:

.. this will support the validation of controls to ensure noise, vibration, light pollution controls are routinely reviewed and are effectively controlling the risks (as identified in ESIA / Risk Register or Assessments).

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 4

COMMENT:

Conduct Monitoring to verify performance of progressive closure and demonstrate commitments, validate controls, and progress against agreed KPIs. Report to stakeholders on a regular basis.

SECTION: 24.1 Closure Management, Good Practice, 7

COMMENT:

With references to Baseline assessments that have been completed to identify pre-disturbance conditions and support criteria for closure planning requirements and progressive Reclamation at regular intervals during operational activities.

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

Consistent with other industry standards, it is expected that some additional guidance / interpretation or consultation with subject matter experts maybe required for implementation by operational teams.

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

The application of the three-level performance structure can still be quite subjective. A level 0 maybe worth adding, which indicate nothing is in place. No conformance at all to the standard requirements.

–> Foundational Practice, Towards Good Practice or Below Good Practice are all naming options for Level 1.

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

No further comments.