

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

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

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

Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

1. *Engage communities on ecosystem services*

Support. Keep the two way engagement and prioritisation; consider defining "priority" via double materiality (impact + financial), as per our suggestion. Also suggest that engagement also consider how mitigation measures themselves affect access to/provision of services, with alternatives where impacts are unavoidable.

2a. Mitigation hierarchy—avoidance first

Support, but move “avoidance first from the earliest stage” to the “Towards Good Practice” level.

2b. Progressive rehabilitation/restoration

Support. Suggest progressive rehabilitation to be moved to the “Towards Good Practice” level.

2c. Offsets for natural habitats (NNL by closure)

Support with edits. Clarify that offsets be commenced as early as possible (before impacts) and require good practice principles (additionality, equivalence, durability) to ensure credible NNL.

2d. Offsets for Critical Habitat (Net Gain by closure)

Support with edits. Apply the same early start and good practice principles; initiate before impacts and confirm Net Gain for the qualifying biodiversity values. Also suggest a edit to the language here to align with the definition of critical habitat (see PS6 Guidance note), which is dependent on established thresholds rather than “designations”.

3. BMP actions, monitoring, IAS

Support with edits. Ensure monitoring tracks outcomes toward NNL/NG targets (relative to baseline), not only action completion, with corrective actions pre defined in the management plan.

4. Stakeholder/rights holder involvement in BMP

Support. Consider requirement for public disclosure.

5. Disclose loss/gain methodology; if NNL infeasible

Support with edits. Define “infeasible” (ecological/social constraints may apply; financial reasons should not). Require time bound ACAs and disclose costs/financing approach. Consider public disclosure of tracking actions and outcomes against NNL/NG targets.

6. Publicly disclose nature related MDR&O

Support with edits. Define materiality as double materiality (impact + financial) and align with TNFD/GRI/CSRD/ISSB for priority locations. Consider also public disclosure of Biodiversity Management Plans and monitoring outcomes.

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

COMMENT:

1a-d. Landscape scale action (halt & reverse loss; 30x30/restoration; legacy sites)

Support with edits. Suggest prioritising regional conservation priorities when selecting conservation/restoration initiatives (e.g., strengthening protected area networks, high integrity landscapes).

2. Integrate nature into decision making

Support with edits. Suggest operationalising this via TNFD aligned governance, strategy, risk/impact processes and capital allocation (e.g., biodiversity investment screens/criteria).

3a-c. Collaborate on BMP delivery/NNL NG and long term protection

Support with edits. Co design offsets/ACAs with stakeholders, monitor jointly, secure long term protection & financing (e.g. through easements, trust funds), and manage biodiversity-wellbeing trade offs explicitly.

4. Independent, IEK informed reviews

Support with edits. Also require periodic reviews and public disclosure of findings with commitment to update the BMP accordingly.

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

COMMENT:

1. World Heritage Sites

Support with edit. Make this impact based avoidance (not only location of Facilities in relation to WHS): i.e. prohibit operations in WHS, avoid all activities that could compromise their OUV or integrity, even from a distance, and mitigate risks from legacy/current operations (as per our initial submission).

2. Protected areas/Ramsar

Support with edit. Keep the compatibility test and add mitigation of impacts to Critical Habitat (as per IFC PS6 definition, including thresholds -see comment below) at this level for new operations and, in addition to avoiding designated protected areas, Ramsar Sites and their respective buffer zones.

3. Communicate prohibitions/restrictions

Support with edit. also communicate the measures/actions taken to avoid impacts to WHS, protected areas and buffer zones, to employees, contractors, rights holders and stakeholders (clarifies accountability).

4. Senior management accountability

Support with edit. Clarify accountable outcomes explicitly: (i) rigorous application of the Mitigation Hierarchy, (ii) avoidance of biodiversity values (WHS, designated sites, buffer zones), and (iii) delivery of NNL/NG targets where relevant.

5. Biodiversity baseline

Support with edits. Specify the baseline year: pre project for new/expansions; 2020 (or earlier) for existing sites. Confirm Aol includes associated facilities and mitigation sites (e.g., offsets). Document the IEK/local knowledge sources used.

6. Risk/impact assessment

Support with minor edits. Confirm scope covers direct, indirect and cumulative impacts on biodiversity and ecosystem services, plus invasive species risks.

7. Biodiversity Management Plan (BMP)

Support with edits. Require explicit, time bound biodiversity NNL/NG targets tied to the baseline and PSR aligned outcome indicators (i.e. state of nature metrics), as well as specific adaptive triggers when performance is off track.

SECTION: Glossary and Interpretive Guidance

COMMENT:

The Glossary has improved in the revised draft –it now defines No Net Loss (including a 2020 baseline for existing facilities), Residual Impacts, and updates Area of Influence to include mitigation measures such as offsets and Additional Conservation Actions. These respond to our earlier recommendations. However, a few key gaps remain:

1. Biodiversity values and Habitat are both explicitly linked the “Critical Habitat”. This definition mirrors IFC Performance Standard 6’s five qualifying criteria for natural and critical habitat but omits the thresholds required to determine when a habitat qualifies. Recommend adding reference to IFC Performance Standard 6 Guidance Note 6 (GN 70 - 83).

2. The definition of “Biodiversity baseline” continues to describe an action (“information that is collected and interpreted”) rather than a state (“conditions at a defined point in time”).

3. No net loss: Good to see the inclusion of a 2020 (or earlier) baseline for existing operations and a pre operation baseline for new or expanded facilities (Glossary, p. 98). This aligns with our earlier submission and

with the Global Biodiversity Framework. We recommend this baseline language also be replicated in the Intent statement and performance requirements for clarity.

4. *Materiality: Still missing. Suggest: Materiality (nature related): A combination of impact materiality (actual or potential effects on biodiversity, ecosystem services or nature) and financial materiality (the degree to which these effects could reasonably influence the organisation's enterprise value), consistent with GRI and ESRS definitions.*

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

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