

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Belgium

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry / trade organisation

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

General Comment

COMMENT:

The standard requires self-assessment, but currently lacks an accompanying tool. We recommend the development of a formal self-assessment tool to support consistent internal evaluations and to facilitate comparison of performance across facilities.

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

Introduction

COMMENT:

To reduce audit fatigue across the mining sector, we encourage the establishment of cross-recognition mechanisms with other industry standards. Two options are suggested:

- Recognition at the auditor's discretion, allowing auditors to validate results from relevant IRMA or RMI audits against CMSI requirements.*
 - Recognition at the CMSI system level, supported by a comparison guide issued by CMSI mapping equivalent requirements across frameworks.*
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Overarching Glossary

COMMENT:

Clarity of Definitions and Scope

- Further clarification is needed regarding the term "significant business changes" as referenced in The Consolidated Standard Assurance Process. Clear parameters would support consistent interpretation across diverse mining operations.*
 - Additional guidance is requested on potential limits or eligibility criteria for countries or facilities wishing to participate in National Panels, to ensure transparency and equitable access.*
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Performance Area 05: Human Rights

SECTION: 5.1 Human Rights

COMMENT:

We suggests broadening the requirement related to human rights to ensure that operating entities do not participate in the trafficking of persons, not limited solely to child trafficking, to align with global human rights norms.

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Leading Practice, 3

COMMENT:

We propose transferring requirement 7.1.1 ("Remunerate all workers with fair wages and benefits that represent a living wage") into the "Towards Good Practice" category. This would acknowledge the aspirational nature of achieving living wages across diverse regulatory and economic contexts while still promoting continuous improvement.

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response

COMMENT:

It is recommended that emergency preparedness plans explicitly reference alignment with the APELL methodology or a comparable internationally recognized approach, to enhance interoperability and public-safety outcomes.

Performance Area 12: Engagement

SECTION: 12.1 Engagement, Towards Good Practice, 4

COMMENT:

The standard would benefit from stronger emphasis on systematic communication with stakeholders. For example, Good Practice 12.1 ("Communicate meaningful information and provide materials to stakeholders and rights-holders in a timely manner and in ways that are accessible, understandable and culturally appropriate") could be elevated or reinforced to ensure consistent application across the sector.

QUESTION 1

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

Response: No Response

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: No Response

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: No Response

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