

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Switzerland

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

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: 2: Below expectations

While we recognise the changes made to the Standard, we remain concerned about the Assurance and Claims approaches, on which we have provided comments separately.

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: 2: Below expectations

We remain concerned about the significant burden imposed by the Standard, which may create a significant barrier to adoption for the wider industry.

Document:
Assurance

QUESTION 1

From your perspective, does the Assurance Process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 2: Below expectations

We recognize that the Assurance process sets out a robust and transparent approach. Nevertheless, we remain concerned that the approach does not support the twin objectives of the CMSI effort, namely simplification of the standards landscape and improvement of practice through wide adoption. The proposed approach imposes a significant burden in terms of resources and administration, and lacks clarity in certain key areas. Items contributing to this burden include:

Requirement for annual self-assessment: while the initial assessment is necessary, annual repetition is burdensome. We believe focusing on progress and improvements against the baseline would better serve stakeholders and drive improvement.

Disclosure requirements: while transparency is a critical element of the standard, its impact on resources should not be underestimated; this should be balanced with focus on implementing the Standard and closing out performance gaps.

Lack of clarity on timelines: absence of guidance on duration of each step can hinder planning.

Taken together, these aspects contribute to a significant burden that can distract from prioritizing implementation of the standard, and even deter broad adoption of the CMSI.

We further strongly encourage the partners to start planning for timely availability of capable auditors.

Document: Standard

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

We welcome the extensive effort of developing the Standard and the significant input from public consultation and the advisory groups. The resulting draft sets a high level of expectation, especially at the level of Towards Good Practice, and creates significant disclosure burden for participating facilities. These might present significant barriers to adoption by the wider industry, and should be monitored carefully, especially at the earlier stages of the Standard rollout.

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

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: 2: Below 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: 2: Below expectations

Fundamentally, we are of the strong opinion that this Claims Policy does not incentivize the broader industry performance improvement. We remain concerned about its rigidity and inflexibility. We also note that other standards have adopted more flexible approaches that recognize

different tiers of achievement, and we are concerned that the lack of similar recognition in the Claims Policy will prevent industry adoption. We offer two specific recommendations:

Option to separate implementation of the Standard from Assurance: new adopters should have the option to prioritize implementation of the Standard and to report transparently on their progress, with appropriate safeguards in place to prevent greenwashing. While these companies may move to seeking a formal claim as they strengthen their approach, a graduated approach to Standard implementation and ability to demonstrate progress would encourage wide adoption. The steps in a graduated approach could include self-assessment, third-party validation of disclosure, and varied levels of assurance.

Tiered approach to evaluating achievement of the Standard: the mining industry is highly diverse in terms of size, geographic and market exposure, and maturity. This diversity should be recognized through introduction of different intermediate performance levels within the Claims Policy, in a manner similar to other standards. Such intermediate performance tiers could include specific mandatory performance requirements to avoid dilution of the CMSI or weakening of its reputation.