

CMSI Consultation Response

Respondent Details

NAME

Jasmine Puteri

COUNTRY

Norway

PERMISSION

Yes, CMSI can disclose my feedback, name, and organisation.

STAKEHOLDER

Non-governmental organisation (NGO) / civil society organization (CSO)

ORGANISATION

Rainforest Foundation Norway

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: 1: Significantly below

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: 1: Significantly below

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

Document:
Standard

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Good Practice

COMMENT:

In PA 1 Corporate Requirements, there is no reference to Corporate Group which is essential for integrity and credibility, and in particular claims.

Recommendation: under 1.1 -good practice, add a 3rd point of “Apply corporate-wide sustainability practices and performance over the whole corporate group.”

Under 1.2 -good practice, add a 2nd point “Publicly disclose the entities and associated organisations that make up the Corporate Group.” (note: Corporate Group is defined by the Accountability

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature

COMMENT:

The current draft remains largely process-based rather than performance-based. The CMSI Standard should embed measurable biodiversity targets, standardised baseline and offset methodologies, and mandatory independent verification at the Good Practice level in order to drive genuine nature-positive outcomes.

COMMENT:

Deforestation wording is only in the 4.1 environmental impact assessment, but there is no explicit wording in Performance Area 19: Biodiversity, Ecosystem Services and Nature.

Recommendation: Need to have specific indicator and targets on deforestation, also to include forest classifications in the baseline data, or method throughout the process.

COMMENT:

There is lack of details on metrics, method and verification requirements that companies have to use. In the Biodiversity Baseline, there is no minimum standards for data quality or duration. Recommendation: Need to specify the scientific method, metrics on how to set the biodiversity baseline, including how to verify it and with minimum period of time, timeline to achieve and timeframe.

COMMENT:

There are undefined terms and no metrics or timeframe and timeline for No Net Loss / Net Gain.

Recommendation: Provide guidelines on metrics and terms also period timeframe, timeline for no net loss/net gain target. Need to be able to specify on geographical scale to achieve net gain at site or regional or landscape with obligation of periodical reporting, timeline and target (measurable) to achieve gain with same ecosystem and time-bound deliveries. Add measurable indicators and quantitative ‘no net loss/net gain’ targets.

COMMENT:

Consultation process with IPs and LCs within this are performance on data process is not being mentioned.

Recommendation: Consultation of data need to be done with IPs and LCs as they are the stewards. Add consulta on and verification with multi-layers of government (national and subnational), IPs and LCs, NGOs -to get validation from the data obtained, ie. baseline data, biodiversity data, etc. Need to strengthen and the use of Indigenous Ecological Knowledge (IEK) as mandatory throughout the process with IPs and LCs involvement throughout the process from planning to implementation. As the Indigenous People and Local Communities knows best of the ecological conditions in the area.

COMMENT:

The definition of "ecosystem services" is vague. It requires operationalisation, quantified baseline data (species, habitats, ecosystem-service values), monitoring changes over time, and identification of indirect/cumulative impacts (roads, fragmentation, infrastructure). Need of detailed requirements on how to measure ecosystem-services impacts, link to community needs/rights or integrate biodiversity with human livelihoods.

Recommendation: Need to have explicit requirements for evaluation of ecosystem services (e.g., water regulation, pollination, cultural services), stakeholder co-identification of services, monitoring of change, remedial action if the ecosystem services degrading.

COMMENT:

There is no set assurance on biodiversity financial mechanisms to secure long-term ecosystem stewardship on post closure.

Recommendation: need to set-up plan that ensures financing to ensure recovery.

COMMENT:

FPIC should be extended to all affected communities for biodiversity-critical decisions

COMMENT:

Need to define "area of influence" in the Toward the Good Practice, based on ecological or watershed boundaries. Require inclusion of indirect and cumulative effects. It is ambiguous and left to company discretion. Risk of excluding indirect, cumulative, and landscape-scale impacts.

COMMENT:

Monitoring frequency and disclosure still unspecified, annual reporting should be mandatory and public.

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

COMMENT:

In the Mitigation Hierarchy and 19.1 Towards Good Practice and Good Practice requirements, avoidance is very weak and needs to include a broader range of values that are critical for maintenance and protection biodiversity, ecosystem services and nature. For many of these area and habitat-based values it is not possible to minimise, restore or offset them. For CMSI to be a credible standard it needs to ensure mining avoids these areas or avoids destroying these values.

Recommendation: Have clear requirement for avoidance of: all types of protected and conservation areas including ICCAs; High Conservation Values including Key Biodiversity Areas, Important Bird and Biodiversity Areas, areas with high Species and Plant Richness, Intact Forest Landscapes, and high integrity natural forests; High Carbon Stock areas including primary forest, peatland deeper than 3 meters; Significant Natural Ecosystems, including mangrove areas, critical wetland, shrubland and grassland areas, small islands; Critical Water Bodies, including all marine and ocean areas, glaciers, areas in permanent ice, lakes and significant waterways; Indigenous Peoples territories that are legally protected (ie. registered IP lands in Brazil) and the territories of uncontacted or voluntary isolation Indigenous Peoples, before any other steps, with specific data or specifications for the assessment and identification of these values and areas. Following this the others steps can be engaged to address areas with medium to low biodiversity values, with metrics for each stage, need independent verification of outcomes over long term. If the areas fall under categories of critical (habitats or ecosystem or KBA) and irreplaceable, hence, always to prioritise avoid, and prohibit offsets.

QUESTION 1

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

Response: 2: Below 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: 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

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