

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

South Africa

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: 3: Meets expectations

We take note and appreciate the team for taking some of the concerns into consideration when drafting this revised version

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

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

A self-assessment tool is recommended.

The cost and administrative load of expanded assurance must be acknowledged.

Clear calculation methods are suggested.

Flexibility in the frequency of the assurance cycles - that can be long in case of established operations - is suggested.

Social indicators are often difficult to quantify and assure without proper documentation - we suggest the standard to require documentation minimums.

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

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

There are a few major terminologies, including rights-holders, affected stakeholders, local, and Indigenous Peoples, which vary in meaning depending on the jurisdiction.

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

Yes although the smaller or less-resourced operations might struggle to comply

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

Yes but could be strengthened by providing clearer guidance on how aggregated scores are calculated, the basis for determining a Performance Claim and how companies can communicate year-on-year improvement to incentivise continuous progress.