

# CMSI Consultation Response

## Respondent Details

NAME

Tania Bossi

COUNTRY

Germany

PERMISSION

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

STAKEHOLDER

Industry / trade organisation

ORGANISATION

In

## 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

### 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: 3: Meets expectations

Document:  
Assurance

## 2. Roles and Responsibilities

SECTION: B. Assurance Providers

COMMENT:

*Timeframes should be specified between e.g. submission of facility assurance plan and audit*

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SECTION: D. National Panels

COMMENT:

*Provide clarity on whether there are any limits for the countries/facilities to join National Panels.*

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## 4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.3 Media Scan

COMMENT:

*Media scanning can be used purely as guidance. However, it can surface issues which are out of context or based on biased reporting.*

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SECTION: 4.6 Continual Improvement Plan, 4.6.1 Self

COMMENT:

*The standard requires self-assessment; consequently, a self-assessment tool should be provided to facilitate self-assessment by facilities and to allow for subsequent comparison of facilities results.*

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SECTION: 4.6 Continual Improvement Plan

COMMENT:

*The administrative burden of yearly updates to self-assessment reports and Continual Improvement Plans in between independent assurance is high.*

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## **6. Public Grievance Mechanism**

COMMENT:

*Align grievance mechanism requirements with UNGP effectiveness criteria*

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### **General Comment**

COMMENT:

*Key recommendations from the PGM sector:*

- Strengthen assurance independence and clarify audit timelines, process steps and feedback mechanisms*
  - Increase transparency in claims policy*
  - realistic expectations regarding gap closure where long-term projects are required*
  - clarity whether assurance cycles re-open after medium-term corrective actions*
  - consistent definition of business days vs. calendar days*
  - transparent criteria for maintaining the performance claim*
  - clear, published fee structures*
  - provide a self-assessment tool for the Standard to facilitate self-assessment by facilities and to allow for subsequent comparison of facilities results*
  - annual self-assessment is a heavy burden for companies; better align this with corrective actions timelines and auditing cycles*
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COMMENT:

*Priority recommendations:*

- Reduce duplication by recognising equivalent processes such as existing corporate policies (e.g. code of conducts)
- Recognize assurance activities already conducted under recognised frameworks (e.g., LPPM, IRMA, ISO Standards)
- Provide explicit alignment with key regulatory frameworks, especially EU CSDDD and CSRD which is of particular relevance to EU downstream users
- IPA recommends CMSI expand the cross-recognition of equivalent processes to reduce unnecessary duplication and audit fatigue.

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COMMENT:

*Assurance Independence and Quality*

*The association supports CMSI's efforts to strengthen the independence of Assurance Providers, clarify decision-making authority, and improve conflict-of-interest oversight. These enhancements will contribute to more credible assurance outcomes and help build trust in CMSI as a global standard.*

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COMMENT:

*The industry encourages CMSI to clarify procedural expectations for Assurance Providers, including timelines for sharing assurance plans and expectations for stakeholder engagement in advance of site visits. The standard should also clarify what constitutes a "safe space" for interviews and avoid unnecessary requirements that could increase the cost or logistical burden of assurance. Members emphasise that media scanning, while useful, should not form the basis for conclusive findings given the prevalence of inaccurate or sensationalised reporting. Finally, the distinction between minor and major non-conformances should be applied consistently across the standard, particularly where safety-critical considerations are involved.*

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QUESTION 1

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

Response: 3: Meets expectations

Document:  
Standard

**General comment on Performance Area**

COMMENT:

*The International Platinum Group Metals Association (IPA) welcomes the opportunity to provide feedback on the second draft of the Consolidated Mining Standard Initiative (CMSI). The association strongly supports CMSI's ambition to harmonise multiple leading responsible mining frameworks into a single global standard that is practical, rigorous, and credible.*

*IPA recognises and appreciates the significant improvements made in the second draft, including clearer definitions, more consistent terminology, enhanced alignment with international norms, and the strengthened framing of performance levels. These refinements demonstrate CMSI's commitment to a transparent and inclusive development process.*

*At the same time, IPA highlights several areas where further refinement is needed to ensure the standard is implementable across diverse jurisdictions and operational contexts. Key themes include the need for additional clarity in definitions, improved practicality for facility-level application, stronger cross-recognition with existing standards to reduce audit fatigue, and further refinement of assurance requirements to ensure independence and feasibility.*

*The PGM industry strongly supports CMSI's alignment with leading frameworks such as the UNGPs, UNDRIP, OECD Due Diligence Guidance, ILO conventions, IFRS/ISSB, TCFD, TNFD, and CSRD. However, consistency across these frameworks must be maintained within the CMSI performance levels to prevent confusion for both companies and auditors.*

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COMMENT:

*Key asks from IPA include:*

- 1. Adopt a formal cross-recognition framework to avoid duplicative audits and reduce administrative burden.*
- 2. Provide clearer and more consistent definitions across the standard to enhance auditability.*
- 3. Allow for jurisdictional and operational flexibility through risk-based implementation.*
- 4. Strengthen assurance independence and transparency, including clearer conflict-of-interest management and assurance planning expectations.*
- 5. Clarify which requirements apply at the corporate versus facility level to ensure efficient and accurate reporting.*
- 6. Ensure coherent alignment with climate, biodiversity, human rights, and*

*supply chain frameworks, particularly in performance areas involving multi-framework expectations.*

*7. Maintain balanced disclosure requirements that recognise data privacy, legal constraints, and operational sensitivities.*

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COMMENT:

*To support readiness for the CMSI Standard, IPA suggests including a self-assessment tool that helps facilities evaluate their maturity across governance, stakeholder engagement, labour practices, environmental performance, and assurance preparedness.*

*Overall, IPA strongly supports the vision and direction of CMSI, and is committed to ongoing collaboration to ensure the final standard is both ambitious and practically implementable. The association and its members stand ready to participate in further dialogue and technical engagement as CMSI moves toward finalisation and implementation.*

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COMMENT:

*The IPA welcomes the opportunity to provide consolidated feedback on the second draft of the Consolidated Mining Standard Initiative (CMSI). The IPA represents a global network of PGM producers and fabricators committed to responsible sourcing, safe and ethical operations, and continuous improvement in ESG performance.*

*IPA members strongly support CMSI's ambition to harmonise multiple leading mining standards into a unified global framework. The association acknowledges the significant work undertaken by CMSI to reduce duplication, improve consistency, and integrate diverse stakeholder perspectives. The second draft reflects meaningful progress, and the industry appreciates CMSI's openness to input throughout the process.*

*This submission synthesises common perspectives across the PGM industry, drawing on inputs from various member organisations to offer constructive, solution-oriented recommendations.*

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COMMENT:

*Positive Direction and Improved Clarity*

*IPA welcomes the increased clarity across performance areas, the addition of improved definitions, and the alignment of terminology, all of which strengthen the auditability and usability of the standard. The reframing of performance levels to emphasise progression—especially the renaming of “Foundational” to “Towards Good Practice”—is*

*a constructive development that underscores the importance of continual improvement.*

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COMMENT:

*Support for Alignment with Global Standards*

*The PGM industry strongly endorses CMSI's alignment with international norms including the UN Guiding Principles on Business and Human Rights, UNDRIP, ILO conventions, OECD Due Diligence Guidance, IFRS/ISSB, TCFD, and CSRD. Such alignment enhances the credibility of CMSI and reduces the risk of conflicting expectations for companies reporting across multiple jurisdictions.*

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COMMENT:

*Practicality and Contextual Application*

*While the alignment to global norms is welcomed, several requirements may be challenging to implement consistently across jurisdictions. IPA encourages CMSI to adopt practical, risk-based approaches that recognise local legal constraints, cultural nuances, and operational realities.*

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COMMENT:

*The industry encourages CMSI to provide further precision on several terms that are central to consistent interpretation and assurance. Key terms requiring clarity include "material payments," "significant non-compliance," "priority supply chain," "culturally appropriate," and "significant business changes."*

*IPA also highlights the need for clarity regarding whether certain requirements—particularly those involving disclosure—apply at the corporate or facility level. Similarly, expectations around what constitutes a complete management system should be clearly articulated to support consistent implementation.*

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COMMENT:

*IPA reiterates the importance of reducing audit fatigue. The association encourages CMSI to introduce a formal mechanism that recognises equivalent audit evidence from existing standards such as IRMA, RMI, or LPPM, where requirements overlap. This could be achieved either through auditor discretion or through a CMSI-issued guide comparing requirements.*

*Such cross-recognition would uphold rigour while avoiding duplication and unnecessary costs.*

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COMMENT:

*A number of implementation challenges surfaced across member feedback:*

- Requirements for broad stakeholder participation must be balanced with practical constraints and cultural considerations.*
- Disclosure expectations should recognise jurisdictional limitations related to privacy, labour law, and data sensitivity.*
- Fitness-to-work assessments are mandated in certain jurisdictions and should be acknowledged as legitimate and necessary.*
- Provision of PPE at no cost should include guardrails to address misuse or excessive consumption.*

*Some requirements—particularly those requiring extensive facility-level reporting—may impose a high administrative burden without clearly improving risk mitigation and could be streamlined.*

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COMMENT:

*While the second draft improves alignment with leading environmental frameworks, several areas require further calibration. Climate disclosure expectations should maintain consistency between TCFD, IFRS S2, and the tiered performance levels. Scope 3 emissions requirements, in particular, should be aligned clearly across good and leading practice.*

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COMMENT:

*1. Adopt a clear and robust cross-recognition framework*

*To reduce duplication by accepting equivalent audit evidence from recognised standards.*

*2. Ensure definitions and scope statements are fully clear and consistent*

*Supporting stronger auditability and consistent interpretation across facilities.*

*3. Embed jurisdictional and contextual flexibility*

*Through risk-based implementation and recognition of local legal requirements.*

*4. Strengthen the independence and governance of assurance*

*With clear guidance on conflict-of-interest management and procedural expectations.*

*5. Clarify corporate versus facility-level disclosure*

*To ensure efficient reporting and avoid redundant processes.*

*6. Align climate, nature, and human rights expectations cohesively*

*Particularly where multiple international frameworks intersect.*

*7. Preserve data sensitivity and operational security*

*Through balanced disclosure requirements that avoid legal or commercial risks.*

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COMMENT:

*The International Platinum Group Metals Association (IPA) commends CMSI for the significant advances reflected in the second draft of the standard. The association is committed to engaging constructively with CMSI and contributing to the development of a globally credible, practical, and high-impact mining standard.*

*The PGM industry remains ready to collaborate through dialogue to support the refinement and implementation of CMSI, ensuring it delivers real and measurable improvements in responsible mining performance across the sector.*

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## **Performance Area 02: Business Integrity**

SECTION: Applicability

COMMENT:

*Commitment to ethical business practices are ins some businesses the same as the Code of Conduct (potential overlap).*

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## **Performance Area 03: Responsible Supply Chains**

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Good Practice, 1

COMMENT:

*If compliance can be proven via the LPPM processes, this should be recognized and the requirement to implement a management system aligned with OECD due diligence should not be re-tested*

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## **Performance Area 05: Human Rights**

SECTION: Intent

COMMENT:

*HRDD must be positioned as mandatory, non-negotiable requirement at entry level of practice.*

*Binding expectations of the UNGPs, CSDDD, and national HRDD legislation must be met at a minimum.*

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## **Performance Area 07: Rights of Workers**

SECTION: Applicability

COMMENT:

*Some of the jurisdictions legislative frameworks are not aligned with ILO conventions (United States) and in some areas jurisdiction allow for parents to split the maternity leave benefits between two parents (South Africa, Germany...)*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*Respectful workplaces and suitable psychological health must be well defined; there can be various interpretations depending on regional context*

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### **Performance Area 09: Safe, Healthy and Respectful Workplaces**

SECTION: 9.1 Health and Safety Management, Towards Good Practice, 6

COMMENT:

*Costs for PPE may be charged if a misuse or excessive demand is identified.*

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SECTION: 9.2 Psychological Safety & Respectful Workplaces

COMMENT:

*Clearer definition is needed*

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### **Performance Area 14: Indigenous Peoples**

COMMENT:

*We acknowledge that CMSI has significantly strengthened this Performance Area. The PGM sector supports FPIC implementation consistent with international norms, provided CMSI offers clear, operational guidance to avoid misinterpretation.*

*To ensure feasibility and clarity across diverse operating contexts, CMSI should:*

- define FPIC requirements fully aligned with UNDRIP*
  - clarify how FPIC expectations apply where Indigenous Peoples are not formally recognised in national legislation*
  - ensure cultural competence requirements for auditors are explicit*
  - cross-reference FPIC expectations in land, resettlement, and community-impact areas*
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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

### 3. Claims

SECTION: 3.1 Types of Claims, 3.1.2 Assured Claim

COMMENT:

*The fee module needs to be made publicly available before the claims policy is set, so that this requirement is well understood*

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SECTION: 3.1 Types of Claims, 3.1.3 Performance Claim

COMMENT:

*'- provide transparent criteria for maintaining the performance claim*

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### General Comment

COMMENT:

*IPA recommends improvements to the clarity and feasibility of the claims policy. This includes publishing fee schedules before finalising claims requirements, clarifying how performance fluctuations due to project life cycles affect claim status, and offering detailed guidance on what constitutes "actionable" corrective actions.*

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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