

# CMSI Consultation Response

## Respondent Details

NAME

Linda Smids

COUNTRY

Finland

PERMISSION

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

STAKEHOLDER

Industry / trade organisation

ORGANISATION

The Finnish Mining Association FinnMin

## 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: 3: Meets expectations

Document:  
Assurance

### QUESTION 1

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

Response: 5: Significantly exceeds

Document:  
Standard

## General comment on Performance Area

COMMENT:

*We appreciate the opportunity to participate in the final public consultation for the Consolidated Standard, Assurance Process, and Claims Policy. While we support the overarching objectives, we are concerned that the current version has become disproportionately demanding, raising questions about*

*whether many companies –especially smaller ones –in Finland will be able to comply in practice. Ensuring the feasibility of implementation is critical to achieving meaningful and broad adoption. It is important that the standard demonstrates clear alignment with existing and widely recognised sustainability frameworks. Many elements of the CMSI originate from the TSM, yet consistency with other standards—such as the European ESRS criteria, the VSME standards for small and medium-sized enterprises, and the GRI framework—is essential to avoid duplication, confusion, and unnecessary administrative burden. Moreover, the standard should allow companies to reflect national legislative requirements. In Finland, legislation already covers some of the performance areas addressed in the draft, and duplicative reporting on legally mandated obligations would not provide additional value.*

*Verification requirements should also be proportionate, transparent, and cost-effective. The assurance process must not evolve into an excessive administrative or financial burden for companies, nor should it create opportunities for disproportionate consultancy or assurance fees. Certain sections of the draft, such as references to “complete independent assurance,” require clarification to ensure there is no ambiguity regarding the scope and extent of required verification.*

*Several technical aspects of the standard would benefit from clearer definitions and further guidance. For instance, the method for calculating accident rates should be standardised, and terms such as “publicly disclose” must be precisely explained to ensure consistent application. Similarly, the draft should further clarify sections where reporting is intended at the level of individual production facilities or at group level, as this significantly affects how companies organise and present information.*

---

COMMENT:

*We also note that the performance area concerning impacts on Indigenous Peoples should reflect practical realities. Requirements related to free, prior, and informed consent (FPIC) must account for situations in which Indigenous groups may decline to enter negotiations. In such cases, it should be sufficient for companies to demonstrate a genuine and well-documented effort to engage in dialogue.*

---

COMMENT:

*Overall, we encourage efforts to ensure that the standard is practical, proportionate, and aligned with existing frameworks. A well-prepared and globally recognised standard will strengthen the mining industry’s sustainability efforts and make it easier for stakeholders to compare information between companies. Yet, clear definitions and guidance to national legislative contexts will be essential to ensuring broad, effective and meaningful implementation across different operational environments and countries.*

---

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

COMMENT:

*Performance Area 9 should specify a common and standardized calculation method for measuring accidents to ensure comparability and clarity across reporting entities.*

---

## Performance Area 14: Indigenous Peoples

SECTION: 14.1 Indigenous Peoples

COMMENT:

*The requirement to obtain agreement with Indigenous Peoples through a process demonstrating free, prior, and informed consent (FPIC) must account for situations in which Indigenous groups decline to enter negotiations. In such cases, it should be sufficient to demonstrate a genuine and well-documented effort to engage in negotiations.*

---

QUESTION 1

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

Response: 4: Exceeds 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: 3: Meets 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: 3: Meets expectations