

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Brazil

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (midstream)

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

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: 3: Meets expectations

Document:
Standard

General comment on Performance Area

COMMENT:

It is important to acknowledge the significant evolution of all documents throughout the process, reflecting a consistent effort to improve the standard and enhance its applicability within the sector. This evolution demonstrates greater alignment with international best practices and strengthens the credibility of the standard. For the final review, we recommend: • Ensure all terms are specified in the glossary: this reduces ambiguities, facilitates uniform interpretation, and promotes consistency among different companies and auditors. • Conduct

a comprehensive review of the requirements to ensure clarity and objectivity: clear requirements prevent divergent interpretations, reduce non-compliance risks, and increase implementation efficiency. • Adjustments to guarantee standardization in implementation: standardization is essential to ensure comparability across operations, strengthen benchmarking, and consolidate responsible practices within the sector. • Avoid using terms that are difficult to measure or demonstrate (e.g., “fully”): this increases audit objectivity, reduces subjectivity, and ensures that evidence is verifiable. • Evaluate suggestions for changing the level of requirements: level adjustments can improve applicability and ensure that requirements are proportional to their criticality and expected impact. • Develop an annex with practical examples of evidence: this facilitates understanding, reduces implementation doubts, and increases the reliability of assessments. Conclusion: The clearer and more objective the requirements are, the more effective the implementation will be, ensuring standardization and responsible practices across the entire sector. This approach contributes to transparency, comparability, and credibility, strengthening governance and sustainability in mining.

Performance Area 01: Corporate Requirements

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Good Practice

COMMENT:

Integrate sustainability metrics into senior executive compensation. Feedback: According to the proposed requirement, considering that the Standard mentions sustainability metrics in the remuneration of senior managers in a generic way, without establishing specific values, predetermined percentages, or specific themes from the Standard in question. If the Standard addresses this matter in detail, we need to assess whether these elements are aligned with or feasible within the business reality and global standards.

SECTION: 1.1 Board and Executive Accountability, Policy and Decision, Making, Leading Practice

COMMENT:

Integrate sustainability metrics linked to meeting the Good Practice or Leading Practice of this Standard into senior executive compensation. Feedback: Vale already applies goals linked to ESG topics in the variable compensation of its executives. However, at this point, we cannot guarantee that we will have goals tied to the requirements of specific standards, such as the CMS Standard. In our assessment, the company needs to maintain flexibility in defining its variable compensation targets, including those related to ESG, in line with the company’s strategy, its business operations, and also to allow for diversified weighting across the various areas of executive responsibility.

SECTION: 1.3 Transparency of Mineral Revenues, Good Practice, 3

COMMENT:

Publicly disclose new mineral development contracts with host governments or disclose a link to where they are publicly available.

SECTION: 1.4 Risk Assessment, Good Practice

COMMENT:

New: Establish a Risk Map supported by a standardized taxonomy that guides the systematic recording of organizational risks and enables their classification into structured categories or groups.

COMMENT:

New: Define and monitor KPIs

COMMENT:

New: Define a risk response strategy, ensuring consistency between acceptable exposure levels and prevention and mitigation actions, aligned with strategic objectives.

SECTION: 1.4 Risk Assessment

COMMENT:

New: Develop and monitor predictive KRIs that enable the anticipation of strategic risk events before they materialize

COMMENT:

New: Report risk indicators (KPI e KRI) and other strategic information to the company's management, taking into account the risk's significance and the appropriate hierarchical level

COMMENT:

New: Implement Risk Committees to support Senior Management in decision-making and in the strategic management of risks

COMMENT:

New: Implement a process for identifying, monitoring, and managing emerging risks.

COMMENT:

New: Publish a Risk Appetite Statement that defines the levels of risk the company is willing to accept, ensuring alignment with strategic objectives and response capacity, and guiding strategic decisions

SECTION: 1.4 Risk Assessment, Towards Good Practice

COMMENT:

New: Promote training among employees to enhance risk awareness and implement a risk management culture

SECTION: 1.5 Corporate Crisis Management, Leading Practice, 2

COMMENT:

Review and update the Corporate Crisis Response Plan at least every year and incorporate improvements or changes based on the simulations as needed. Feedback: It would perhaps be interesting to let companies define the minimum frequency of review. For companies with many sites 1 year to review all plans may be unfeasible. The requirement could bring that at most 2 years or whenever necessary, giving a little more flexibility to large companies.

SECTION: 1.5 Corporate Crisis Management, Towards Good Practice, 2

COMMENT:

Develop a draft Corporate Crisis Response Plan (CCRP) that addresses identified scenarios to support crisis response. Adjustment this requirement for Good Practice Rationale for Level Adjustment: We understand that the key is to have the related plans at the site level. Soon, miners with a smaller number of sites would already enter Good Practice.

SECTION: NA, Leading Practice

COMMENT:

For facilities in non-EITI implementing countries and where no equivalent regulations exist, encourage the host government to join/implement EITI and/or support local efforts designed with the same objective or purpose. Feedback: The requirement is very subjective and difficult to demonstrate. It is suggested to review the text to clarify what is expected.

SECTION: NA, Leading Practice

COMMENT:

Publicly disclose existing mineral development contracts with host governments or disclose a link to where they are publicly available. Feedback: We recommend that this item should be assessed considering the applicable laws in each country/jurisdiction. Some requirements, such as the examples above, do not apply to certain countries.

COMMENT:

The current requirements do not follow the logical sequence for implementing risk management as outlined in the global best practices (Identification, Analysis, Monitoring, and Reporting). Therefore, we suggest including new requirements that ensure the risk management process is implemented in a structured manner, supporting continuous improvement of both the process and its evaluations. With these adjustments, it will be possible to effectively assess the implementation of corporate risk management in any company within the sector.

Performance Area 03: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities), Good Practice, 4

COMMENT:

Conduct an internal review of effectiveness of actions to identify, prevent and/or mitigate supply chain risks at defined intervals. Split this requirement in Good Practice and Leading Practice Rationale for Level Adjustment: Maintain only the Tier-1 at the Good Practice level. Tier-2 and other parts should be "leading practice".

Performance Area 04: New Projects, Expansions and Resettlement

SECTION: 4.2 Land Acquisition and Resettlement, Leading Practice, 3

COMMENT:

Publicly disclose the results of the independent review of the resettlement action plan (RAP) and, if applicable, the livelihood restoration plan, while protecting the confidentiality of affected stakeholders and rights-holders.

Feedback: The standard could define that when we say publicly disclosures we specify in some cases, as in this application that the disclosure may not be broad, but for all those involved in the resettlement processes.

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Good Practice, 1

COMMENT:

Identify, prevent, mitigate and account for risks to the workers' rights outlined in Towards Good Practice and demonstrate respect for workers' rights. Feedback: Explain better the purpose of the commitment, as it refers to the Towards. What would be the mechanism to demonstrate respect for workers' rights?

SECTION: 7.1 Rights of Workers, Good Practice, 2

COMMENT:

Implement policies and practices to respect the rights and interests of women and other vulnerable and marginalised groups that reflect gender-and culturally informed approaches to work practices and job design, and that protect against all forms of discrimination and harassment and behaviours that adversely impact on the successful participation of women, vulnerable and marginalised groups in the workplace. Feedback: What would be considered a 'Marginalized Group?' Provide more detail on expected practices.

Performance Area 08: Diversity, Equity, and Inclusion

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 3

COMMENT:

Set objectives and/or targets for DEI representation among corporate leadership. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: Setting representation increase goals exclusive to the leadership level requires that the entire people development process be conducted under the lens of DEI (leadership accountability, diverse succession pipeline, % diversity in recruitment, etc.). This is a complex requirement to practical implementation.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 6

COMMENT:

Establish a process for senior management to review, update and track implementation of the strategy. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: Establishing governance that involves Senior Leadership requires a significant high level of maturity of the DEI agenda.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Good Practice, 7

COMMENT:

Inform scope and methods for data collection and reporting through engagement with a cross-section of people who bring diverse perspectives and experiences (which includes relevant labour or worker groups and individuals who are underrepresented in the mining industry). Feedback: Requirement is structured in a not so clear way of understanding. Demographic data is usually sensitive, so to be in accordance with LGPD legislation, it is not recommended to open this information to employees.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Leading Practice, 1

COMMENT:

Commission an independent review of DEI at defined intervals based on priorities identified by management and workers and publicly disclose the results. Feedback: To have more clarity on what an independent review would be, would it be an external validation? Auditing? Make it clearer what is expected.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Leading Practice, 4

COMMENT:

Conduct an internal review of effectiveness of policies and practices related to DEI at defined intervals and report results both internally and externally. Feedback: Revisit the need for external disclosure.

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Towards Good Practice, 2

COMMENT:

Assign management responsibilities and accountabilities to support diversity, equity and inclusion (DEI) commitments. Adjustment this requirement for Good Practice Rationale for Level Adjustment: In many companies, there is still no effort to have a DEI area exclusive to the topic. DEI is often inserted in the people/culture agenda, so we can consider this requirement as good practice.

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Good Practice, 3

COMMENT:

If diesel equipment is used underground, implement a diesel particulate matter (DPM) management programme to safeguard underground mining workers against exposure to DPM. Adjustment this requirement for Toward Good Practice Rationale for Level Adjustment: This is a legal requirement; it should be in Toward Good Practice.

SECTION: 9.2 Psychological Safety & Respectful Workplaces, Leading Practice, 3

COMMENT:

Establish performance objectives and/or targets or apply performance objectives and/or targets set at the corporate level, related to psychological safety and respect. These include: a. Action plans developed to achieve performance objectives. b. Demonstration of progress towards performance objectives and internal reporting on this progress. Feedback: Setting objectives and/or performance targets or applying objectives and/or performance targets defined at the corporate level, related to psychological safety and respect, may inadvertently discourage the reporting of incidents. Instead, we recommend establishing and monitoring indicators without setting rigid targets. The focus should be on tracking trends and driving continuous improvement of the process, rather than setting fixed goals that could compromise transparency.

SECTION: 9.3 Training, Behaviour and Culture, Good Practice, 3

COMMENT:

Establish mechanism(s) for the participation of workers in hazard identification, in risk assessment and determination of controls, and in setting health, safety and respectful workplace objectives.

COMMENT:

Suggest joining this two requirements (GP3 and GP4).

SECTION: 9.3 Training, Behaviour and Culture, Good Practice, 4

COMMENT:

Establish mechanism(s) for the participation of underrepresented and marginalized groups to identify, assess and address occupational health and safety risks that disproportionately affect such groups. Feedback: The process already covers all workers according to item

Performance Area 10: Emergency Preparedness and Response

SECTION: 10.1 Emergency Preparedness and Response, Good Practice, 2

COMMENT:

Test notification mechanisms that activate emergency and crisis response teams at least twice per year. Feedback: In companies with many risks, it is difficult to do tests twice annually, like our comment in item 1.5. Split this requirement in Good Practice and Leading Practice Rationale for Level Adjustment: We understand that taking the annual test is good practice. 2 times a year would be Leading Practice.

SECTION: 10.1 Emergency Preparedness and Response, Leading Practice, 2

COMMENT:

Update the Emergency Preparedness and Response Plan at least every year and incorporate improvements or changes based on the simulations. Feedback: It would perhaps be interesting to let companies define the minimum frequency of review. For companies with many sites 1 year to review all plans may be unfeasible. The requirement could bring that at most 2 years or whenever necessary, giving a little more flexibility to large companies.

Performance Area 12: Engagement

SECTION: 12.1 Engagement, Good Practice, 5

COMMENT:

Make available at defined intervals a summary of engagement activities and feedback in a way that is accessible to local stakeholders and rights-holders, including the types of engagement and topics/themes of the engagement and how input has been integrated into decision-making or actionable change at the Facility. Split this requirement in Good Practice and Leading Practice Rationale for Level Adjustment: We think that this final part of the application could be Leading Practice.

SECTION: 12.1 Engagement, Good Practice, 6

COMMENT:

Support the capacity of stakeholders and rights-holders to effectively engage in consultation and dialogue processes, where appropriate, with particular consideration to women, vulnerable and/or underrepresented stakeholders and rights-holders. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: We understand that what is required in the application goes beyond the role of companies, is more complex and may have changes in specific cultures. Review what is requested.

SECTION: 12.1 Engagement, Leading Practice, 1

COMMENT:

Engage stakeholders and rights-holders in the co-design and/or joint decision-making on activities that directly affect them. Feedback: We suggest improving of requirement text because it is not understandable whether it is the design phase or during the operation phase.

SECTION: 12.1 Engagement, Leading Practice, 2

COMMENT:

Engage stakeholders and rights-holders on broader Facility-related topics, beyond what may directly impact them. Feedback: The identification of the "beyond" is not clear, it does not specify what it is about, whether it is about the process of mitigating impacts or voluntary actions, for example. We suggest improving the writing.

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Community Impact Management, Leading Practice, 1

COMMENT:

Collaborate with relevant stakeholders and rights-holders to conduct joint monitoring of the Facility's action plans. Feedback: The wording is uncertain about what the action plans are about. Is it environmental? Social? Socio- environmental? Are they engagement plans? Are the installation activities working? We suggest making the request more specific.

SECTION: 13.1 Community Impact Management, Leading Practice, 2

COMMENT:

Collaborate with relevant stakeholders and rights-holders to complete a review of the effectiveness of the Facility's action plans. Publicly disclose the key findings of the review. Feedback: The wording is unclear about what the action plans are about. Is it environmental? Social? Socio- environmental? Are they engagement plans? Are the activities for installation working? We suggest making the request more specific.

SECTION: 13.2 Community Development and Benefits, Good Practice, 2

COMMENT:

Engage affected stakeholders and rights-holders, local community leaders and representatives, including women, vulnerable and underrepresented groups and local authorities to identify and prioritise opportunities for community development and implement priority actions. Feedback: This requirement is very similar to GP1, suggestion to join into a single indicator requirement.

SECTION: 13.2 Community Development and Benefits, Good Practice, 3

COMMENT:

Establish partnerships with governments, local civil society, Indigenous organisations and other development actors where appropriate to progress the Facility's contribution to socio-economic development. Initiatives should take into consideration local, regional and/or national government development plans where they exist.

SECTION: 13.2 Community Development and Benefits, Good Practice, 4

COMMENT:

Develop and implement a plan to support increased levels of local procurement and employment. Feedback: It was not clear in the criterion what the "increasing level" of acquisition and labor is about. Make the requirement more specific.

SECTION: 13.2 Community Development and Benefits, Leading Practice, 2

COMMENT:

Provide capacity-building and technical assistance to local community institutions and engage local and Indigenous businesses, or their representative bodies where appropriate, to improve their capabilities to participate in long-term local and regional economic opportunities, if required. Feedback: We suggest review the requirement text, as it has a specific form for indigenous peoples. Here I believe we are dealing with local and non-traditional communities

SECTION: 13.2 Community Development and Benefits, Towards Good Practice, 6

COMMENT:

In consultation with the local stakeholders and rights-holders, develop a community development plan, commensurate with the social context of the Facility. Adjustment this requirement for Good Practice

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Indigenous Peoples, Leading Practice, 5

COMMENT:

LP5. Collaborate with Indigenous Peoples to conduct a review of effectiveness of the training and awareness programmes at mutually agreed intervals. Make improvements as required.

Feedback: In practice, would it make sense for communities to participate in the review of the training, or could they be involved in order to evaluate and propose suggestions for the training offered?

Performance Area 15: Cultural Heritage

SECTION: 15.1 Cultural Heritage, Good Practice, 3

COMMENT:

GP3. Where cultural heritage impacts are unavoidable, develop and implement, in collaboration with affected stakeholders and rights-holders, mitigation measures that aim to maintain the cultural heritage's value and functionality.

Adjustment this requirement for Toward Good Practice

Rationale for Level Adjustment:

Companies need to mitigate the impacts of their operational activities, as a legal obligation

SECTION: 15.1 Cultural Heritage, Good Practice, 4

COMMENT:

GP4. Where unavoidable impacts affect irreplaceable or critical cultural heritage, support its removal and preservation in line with the best available techniques in collaboration with stakeholders and rights-holders and responsible authorities."

Feedback: We suggest removing the term "critical" from the essay, considering that there is no such difference when it comes to the theme of cultural heritage.

SECTION: 15.1 Cultural Heritage, Towards Good Practice, 2

COMMENT:

TG2. Identify and assess risks to cultural heritage that could be affected by the Facility's activities and operations in consultation with stakeholders and rights-holders of cultural heritage and informed by:

d. Traditional land use or community studies.

e. Indigenous Peoples' knowledge.

Feedback TG2 (d-e): We suggest evaluating the requirement text specifying the term community studies for Indigenous Peoples.

SECTION: 15.1 Cultural Heritage, Towards Good Practice, 3

COMMENT:

TG3. Where there are potential adverse impacts to Indigenous Peoples' critical cultural heritage and such impacts are unavoidable, work through decision-making processes as outlined in Performance Area 14: Indigenous Peoples, which addresses obtaining agreement through a process demonstrating free, prior and informed consent (FPIC).

Performance Area 17: Grievance Management

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights, Holders, Leading Practice

COMMENT:

Publicly disclose the number and types of issues and concerns raised through the grievance mechanism, affected stakeholder group and types of actions taken in response, resolution and/or remediation of such issues, as well as the timeline between grievance reporting and resolution while safeguarding confidentiality and protecting the identity of complainants. Feedback: The suggestion to change the requirement: not to include response, remediation or solution actions and the timeline between the report of the complaint and the resolution, due to the high number of manifestations and complaints received via the mechanism and the risk of exposure of the communities.

Performance Area 18: Water Stewardship

SECTION: 18.1 Water Management and Performance, Good Practice, 1

COMMENT:

Prepare a Facility-wide water balance that is both operational and predictive and is informed by monitoring data, identified risks and update at defined intervals. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: In the ICMM item: 4.2b Water balance, it is pointed out that the water balance can be used predictively but does not place this requirement as mandatory. • Can be used predictively to optimize operational water management and set operational limits for adaptive management strategies (see 4.2c).

SECTION: 18.1 Water Management and Performance, Good Practice, 10

COMMENT:

Establish water-related objectives and/or targets to protect other beneficial users and reduce risks to ecological health of the watershed and to other water users, including rights-holders. Feedback: Review text to: Establish objectives and/or targets to protect water resources.

SECTION: 18.1 Water Management and Performance, Good Practice, 4

COMMENT:

Assess how water management practices within the Facility contribute to cumulative impacts on surface water and groundwater in the watershed, including environmental requirements, economic and social uses, and update this assessment at defined intervals. Feedback: Review text to: Assess how water management practices within the Facility contribute to impacts on surface water and groundwater in the watershed, including environmental requirements, economic and social uses, and update this assessment at defined intervals. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: The requirement is in line with other frameworks, however, in ICMM and TSM it does not specify cumulative impacts. It is suggested as a priority to maintain the text, with the removal, in particular, of the cumulative impacts. As a second option, it is suggested to change the level to Leading Practice.

SECTION: 18.1 Water Management and Performance, Towards Good Practice, 4

COMMENT:

Identify water quality and quantity requirements for the Facility over its life cycle including closure. Adjustment this requirement for Good Practice Rationale for Level Adjustment: According to requirement 2.4a Water requirements (asset) (ICMM), the basic level describes only a limited understanding, focused on quantities, without considering water quality, closure or post-closure, and based on estimates with high uncertainty. The advanced level requires a comprehensive understanding of water requirements throughout the facility's entire lifecycle (including closure and post-closure), considering quality and quantity, based on measured data or calibrated models, as well as regular reviews. The leader level adds cross-functional collaboration and integration of life-of-life plans (LOA) with water constraints and considerations.

SECTION: 18.1 Water Management and Performance, Towards Good Practice, 6

COMMENT:

Implement a water monitoring programme for surface water and groundwater, informed by regulatory compliance requirements and identified risks, for both water quality and water quantity parameters. Adjustment this requirement for Good Practice Rationale for Level Adjustment: According to Indicator 2 -Operational Water Management of the TSM, this requirement is more adherent to level A: b. The implementation of a water monitoring program, for surface water and groundwater, comprising the parameters of water quality and quantity and notification of risks, when these are identified or justification for their non-implementation.

SECTION: 18.1 Water Management and Performance, Towards Good Practice, 7

COMMENT:

Communicate material non-compliance and corrective actions to senior Facility management. Feedback: Review text to: Communicate material non-compliance and associated corrective actions for relevant risks to senior facility management.

SECTION: 18.2 Collaborative Watershed Management, Good Practice, 3

COMMENT:

Provide context-specific data and information to inform other water users how operational water management practices relate to identified watershed-related risks, such as those identified through IWRM processes. Inform Facility management about IWRM progress. Feedback: Review text to: Make available context-specific data and information to inform other water users how operational water management practices relate to identified watershed-related risks, such as those identified through IWRM processes. Inform Facility management about IWRM progress.

SECTION: 18.2 Collaborative Watershed Management, Leading Practice, 3

COMMENT:

Where water-related opportunities have been identified, as per Leading Practice 1, and where desired by rights-holders and other water users, through IWRM processes, at least one of the following is occurring in the Facility's watershed with the Facility's participation or support: a. Setting watershed-scale goals, including those contained in land use plans where they exist. d. Collaborative (e.g. participatory) monitoring at the watershed scale. Feedback: Consider removing this requirement, as there are significant differences in institutional arrangements between countries. In contexts where participatory governance and collaborative monitoring at the watershed scale are not institutionalized, mining companies will find it difficult to meet this level of demand, which can generate asymmetries in the comparison between companies from different regions.

SECTION: 18.2 Collaborative Watershed Management, Towards Good Practice, 2

COMMENT:

Assign internal responsibility and accountabilities for engagement with other water users. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: According to Indicator 1 -Water Governance, the TSM this requirement is more adherent to level A: The roles, functions and responsibilities for accountability for the operational management of water and planning at the river basin scale are defined.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice, 2

COMMENT:

Address significant risks and impacts to biodiversity in the area of influence through: d. For new operations and significant expansions, commencing biodiversity offsets for residual adverse impacts on critical habitats as early as possible to achieve net gain of those biodiversity values for which the critical habitat was designated by completion of closure. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: Achieving net gains for biodiversity should be considered Leading Practice

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice, 5

COMMENT:

Publicly disclose the methodology used to calculate losses and gains and to achieve no net loss or net gain. Where no net-loss is infeasible for existing facilities, publicly disclose why and how the mitigation hierarchy and additional conservation actions are applied to appropriately address impacts on biodiversity and associated timeframes. Adjustment this requirement for Leading Practice Rationale for Level Adjustment: The disclosure of the methodology used by the company to calculate its losses and gains in biodiversity should be considered as a Leading Practice, since it demonstrates the company's great maturity in relation to the topic.

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Leading Practice, 3

COMMENT:

Include the following elements in the climate change strategy: a. Planned or actual investments in climate action that will lead to measurable improvements in climate change mitigation and adaptation. b. External engagement process(es) for the ongoing assessment of climate-related risks and opportunities Feedback: Make the requirement more specific. We need to understand what a "measurable improvement in adaptation" would be. What would be the external engagements? The territory? Academy?

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Leading Practice, 6

COMMENT:

Establish a commitment to achieve net-zero emissions by no later than 2050 : this requirement should be foundational and not just a "Leading Practice". ICMM (through their climate statement) and The Copper Mark currently have net zero requirements for Scope 1 and Scope 2 within their standards, and thus this would represent moving backwards in terms of expectations for certified companies. We think this is a fundamental issue that will influence the credibility of the CMSI moving forward.

SECTION: 20.2 Climate Change Management (Facility Level), Towards Good Practice, 2

COMMENT:

Undertake an initial risk assessment to identify potential physical risks and impacts to both infrastructure within the boundaries of the Facility and offsite infrastructure necessary for supporting Facility operations and access from climate change and related adaptation measures. Adjustment this requirement for Good Practice Rationale for Level Adjustment: Reviewing the need to include the evaluation of external infrastructure, we do not understand that it would be a recurring practice in the sector, even more so at a basic level.

SECTION: 20.3 Annual Climate Change Public Reporting, Good Practice, 1

COMMENT:

Publicly disclose Facility-level Scope 1 and 2 GHG emissions data and progress towards corporate targets in alignment with the leading climate disclosure frameworks. c. Publicly disclose at defined intervals, including to affected stakeholders and rights-holders the Facility's assessment of potential physical climate impacts and plans or actions to manage the associated risks, in alignment with the recommendations of the TCFD, including both on mitigation and adaptation. Adjustment this requirement for Leading Practice Rationale for

Level Adjustment: Given that associated requirements under 20.B are under “Good Practice”, it makes sense that the public reporting be one level above.

Performance Area 22: Pollution Prevention

SECTION: 22.3 Non, GHG Air Emissions, Good Practice

COMMENT:

Identify and manage risks of adverse impacts of air emissions from the Facility’s operational activities and infrastructure, on people and the environment (including soil, flora, fauna, and water bodies), and implement a monitoring programme informed by the presence and location of sensitive receptors, to assess identified risks of adverse impacts. Feedback: We suggest removing examples for impact on the environment (including soil, flora, fauna, and water bodies). Today we do not have defined standards for these specificities. Air quality standards are set based on the impact on human health.

SECTION: 22.3 Non, GHG Air Emissions, Towards Good Practice

COMMENT:

Establish baseline data on different types of air emissions from a defined reference date that, subject to an assessment of significance, may include but not be limited to: particulate matter (PM); sulphur oxides (SOx); nitrogen oxides (NOx); and volatile organic compounds (VOCs). Feedback: We suggest removing VOCs from the proposed requirement.

SECTION: 22.7 Noise, Vibration and Light Pollution/Nuisance, Good Practice, 3

COMMENT:

Monitor the effectiveness of mitigation measures at defined intervals informed by permit requirements and the presence and location of people, flora and fauna. Feedback: It is suggested to replace “people, flora and fauna” with “sensitive receptors”.

SECTION: 22.7 Noise, Vibration and Light Pollution/Nuisance, Towards Good Practice, 1

COMMENT:

Identify potential sources of noise, vibration, or light pollution/nuisance, identify the presence and location of sensitive receptors (people, flora and fauna) and implement a monitoring programme informed by regulatory or permit requirements. Feedback: It is suggested to remove the examples of sensitive receptors (people, flora and fauna).

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy for all Facilities, Good Practice, 4

COMMENT:

GP4. Identify opportunities to apply the principles of circularity across the operation’s lifecycle from design of the Facility to closure planning, including but not limited to considering future land use opportunities, and the potential for reuse, recovery and recycling of waste remaining at the Facility.

Adjustment this requirement for Leading Practice

Rationale for Level Adjustment:

The level of complexity of this requirement is too extensive to be considered as Good Practice. It is worth noting that there are mines with LOM that can reach +100 years.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 1

COMMENT:

Identify and manage risks and impacts related to closure and rehabilitation in consultation with affected stakeholders and rights-holders, including but not limited to those related to land, biodiversity, air, water bodies, water sources, climate change, workers, communities, infrastructure, and post-closure liabilities.

Adjustment this requirement for Leading Practice

Rationale for Level Adjustment:

The identification of potential risks and impacts related to mine closure is typically initiated during the early stages of closure planning, even at the project phase, in a preliminary and conceptual manner. As the closure plan matures and the end of operational life approaches, additional stakeholders are progressively engaged. External stakeholders most involved in closure discussions are usually regulators and government agencies, while local communities and company employees often show limited interest or awareness, especially when significant operational life remains. Topics such as climate change and post-closure liabilities are still under debate nationally and internationally, with no consensus on the appropriate timing for engagement. These issues may involve long-term financial commitments that could affect the viability of mining operations.

SECTION: 24.1 Closure Management, Good Practice, 4

COMMENT:

GP4. Identify and incorporate progressive closure opportunities into the closure plan during the operating life of the Facility.

Adjustment this requirement for Toward Good Practice

Rationale for Level Adjustment:

Just as planning takes place from the design phase of the mine, the progressive closure of structures and areas must also be implemented at the earliest opportunities. As an area or structure is no longer being used or there is no longer planning for its use throughout the life of the mine for the operational processes of mining, it must be recovered progressively and prior to the final closure of the mine. This, in addition to being a good practice, is something fundamental and well regarded by external stakeholders. For the company, there are socio-environmental, reputational and financial gains when progressive closure actions are implemented in a mine.

SECTION: 24.1 Closure Management, Good Practice, 9

COMMENT:

Develop and estimate the costs of temporary or sudden closure activities as part of the closure plan to include maintenance, surveillance and emergency preparedness programmes for the protection of health, safety, and the environment and engage affected stakeholders and rights-holders in the process where possible.

Adjustment this requirement for Leading Practice

Rationale for Level Adjustment:

Estimating mine closure costs is a process that can have significant impacts on a company and may even render operations unfeasible. Furthermore, there is no methodological or legislative consensus among mining companies regarding the calculation methods or bases to be used, nor about the assumptions or scenarios to be considered for the various situations that may occur in a mine. Therefore, adding other factors of high financial relevance or premature closure scenarios to the mine closure cost estimate—given the high uncertainty of their likelihood—could make the operation of several mines or mining companies unviable.

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: 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: 4: Exceeds 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

Os níveis de claims tornaram-se excessivamente complexos, o que dificulta a compreensão e torna desafiador comunicar à alta liderança como o processo funcionará na prática, bem como explicar aos clientes o que o selo representa em termos de desempenho.