

# CMSI Consultation Response

## Respondent Details

NAME

Genevieve Campbell

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

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

ORGANISATION

IUCN ARRC Task Force

## 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: No Response

Document:  
Assurance

### QUESTION 1

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

Response: No Response

Document:  
Standard

## General comment on Performance Area

COMMENT:

*Regarding the category names: I don't like the wording 'Towards Good Practice' as it sounds like this is not a pre-requisite but more aspirational. I preferred the wording as it was before, 'Foundational Practice'.*

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## Performance Area 19: Biodiversity, Ecosystem Services and Nature

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

COMMENT:

*2d: it is impossible to achieve Net Gain for great apes by project closure. General offsetting good practice also promotes offset to be sustainable over the long-term, and favorably in perpetuity. The ARRC Task Force is pushing for offsets for great apes to be permanent.*

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SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Towards Good Practice, 1

COMMENT:

*We do not find that the wording around potential impacts to World Heritage Site is strong enough to ensure that impacts to these areas are avoided. Currently it is written as the project needs to ensure no adverse impacts to these sites, but it should at least be confirmed by a third party, or that they have to reach out to Unesco and that it is Unesco that confirms they don't believe the project will impact the OUV of the property.*

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SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Towards Good Practice, 3

COMMENT:

*This comment could be included under 3 or 1-2: it should be explicitly stated that a project should not seek to de-gazette an area or change the boundaries of a protected area to allow for its operations.*

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SECTION: Applicability

COMMENT:

*Should be applicable to all facilities "AND ASSOCIATED INFRASTRUCTURES".*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*Biodiversity baseline: this definition is a bit too vague. It could be changed from 'before a project commences' to 'before project impacts occur (including exploration)'. I would remove also 'or at a particular point in time' or specify when this would happen as otherwise project may choose the point in time that is more favorable to them.*

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COMMENT:

*One element that is not well captured is the inter-relatedness between social and environmental aspects. We are becoming more and more concerned about the risk of disease spillover and zoonotic spread to people and wildlife, including great apes.*

*The acceleration and expansion of large-scale development projects, such as mines, present a real risk of disease spillover and zoonotic spread to both people and susceptible wildlife, including great apes. This is related to the habitat loss, disturbance and fragmentation associated with such projects, and because of the presence of a large number of workers, or immigration, which creates an environment conducive to disease emergence and enhances the risk of transmission. Leading practice should require projects to evaluate these risks appropriately and devise a Disease or Health Management, Action & Monitoring Plan, inclusive of an outbreak emergency response plan.*

*This comment would apply as well to Performance Area 10: Emergency Preparedness and Response.*

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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: 2: Below expectations

It would have been preferable a two tiers approach. Many of the good practice recommendations should be foundational practice. So there could be foundational/good practice and leading practice.

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: No Response