

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Chile

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Consultancy

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

1. Introduction

COMMENT:

¿Considerando que existen 3 niveles de desempeño, van a entregarse 3 tipos de certificaciones diferenciadas (práctica básica, buena práctica y práctica líder)? En caso de existir sellos diferenciados:

Si existen áreas de desempeño categorizadas en práctica líder y otras en buena práctica, ¿cuál sería el tipo de certificación a entregar?

TRANSLATION:

Considering that there are 3 levels of performance, will there be 3 different types of certifications (foundational practice, good practice, and leading practice)? If there are different seals:

If some performance areas are categorized as leading practices and others as good practices, what type of certification should be awarded?

COMMENT:

¿Es obligatorio alcanzar el nivel de Buena Práctica en todas las áreas para obtener el sello?

TRANSLATION:

Does the Good Practice level need to be achieved in all areas in order to obtain the seal?

COMMENT:

Respecto al punto 4.a de Implementación del estándar se sugiere esclarecer el rol del corporativo.

TRANSLATION:

Regarding point 4.a on Implementation of the Standard, we suggest clarifying the role of the corporate body.

COMMENT:

En nuestra experiencia, el plazo de 1 mes nos parece imposible para la preparación del informe, dado que muchas veces el emplazamiento solicita la revisión.

En el proceso se señala "Al concluir el Proceso de Aseguramiento, la Instalación debe utilizar los mismos mecanismos de comunicación que se utilizaron para la notificación anticipada del Proceso de Aseguramiento para distribuir el Informe de Aseguramiento final a sus partes interesadas y titulares de derechos. Como parte de esta comunicación, se debe informar a las partes interesadas y a los titulares de

derechos de que, si desean ofrecer comentarios u observaciones sobre el contenido o la exactitud del Informe de Aseguramiento, pueden hacerlo directamente poniéndose en contacto con el Proveedor de Aseguramiento. El Proveedor de Aseguramiento debe ofrecer una cantidad razonable de tiempo que se ajuste al Plan de Aseguramiento, especialmente para cuestiones de precisión fáctica.", lo que nos parece riesgoso.

TRANSLATION:

In our experience, the one month deadline is impossible to prepare a report, given that the site often requests a review.

The process states "At the conclusion of the Assurance Process, the Facility is required to use the same communication mechanisms that were used for the advanced notice of the Assurance Process to distribute the final Assurance Report to its stakeholders and rights holders. As part of this communication, stakeholders and right holders should be informed that if they wish to provide feedback or make observations about the content or accuracy of the Assurance Report, they can do so directly by contacting the Assurance Provider. The Assurance Provider should provide a reasonable amount of time that fits within the Assurance Underwriting Plan, especially for issues of factual accuracy," which seems risky to us.

COMMENT:

En el proceso se señala "Después de terminar cada entrevista, dentro de un período de tiempo razonable, el Proveedor de Aseguramiento facilitará un resumen de los puntos clave de la entrevista a cada entrevistado para garantizar que la información capturada por el Proveedor de Aseguramiento sea precisa.

Este resumen puede facilitarse por escrito después de haber realizado la visita al lugar de trabajo. Sin embargo, si el entrevistado prefiere que el Proveedor de Aseguramiento proporcione un resumen verbal de los puntos clave, el Proveedor de Aseguramiento podrá hacerlo.", lo que nos parece difícil de realizar dado que muchas veces no mantenemos los contactos. Además, los entrevistados suelen entregar mayor información bajo la confidencialidad.

TRANSLATION:

The process states "Once each interview is complete, within a reasonable amount of time, the Assurance Provider shall provide a summary of key points from the interview to each interviewee to ensure the information captured by the Assurance Provider is accurate.

This summary may be provided in writing after the site visit is complete. However, if the interviewee would prefer that the Assurance Provider provide a verbal summary of key points, the Assurance Provider is able to do so," which we find difficult to do since we often do not maintain contacts. In addition, interviewees tend to provide more information under confidentiality.

COMMENT:

Precisar con qué estándares podrían ser equivalente

TRANSLATION:

Specify which standards they could be equivalent to.

COMMENT:

Especificar a qué se refiere con tiempos razonables, se menciona muchas veces que debe ser definido por el asegurado.

TRANSLATION:

Specify what is meant by reasonable amount of time; it is often mentioned that this should be determined by the assured party.

COMMENT:

¿Se ha considerado establecer alivios de transición para quienes están iniciando en este proceso de acreditación o para quienes, en las medidas de sus circunstancias este tipo de acreditación implica una inversión de recursos que dependiendo del tamaño de la operación puede ser esfuerzos desmedidos?

TRANSLATION:

Has consideration been given to establishing transition relief for those who are initiating this accreditation process or those for whom, depending on their circumstances, this type of accreditation entails an investment of resources that may constitute disproportionate efforts, depending on the size of the operation?

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

Performance Area 01: Corporate Requirements

COMMENT:

En el Área de Desempeño 1: Requisitos Corporativos, se señala que su aplicabilidad es "los requisitos de esta área de desempeño están destinados a ser implementados y garantizados a nivel corporativo, sin embargo, en la medida de lo posible, pueden ser implementados y verificados a nivel de las Instalaciones.", respecto al

nivel 1.2 Informes de Sostenibilidad¿respecto al TCM 3.0 que pide que la divulgación sea a nivel de sitio, ¿con el nuevo estándar consolidado podría reportarse solo nivel corporativo?

TRANSLATION:

In Performance Area 1: Corporate Requirements, it states as to applicability that “the requirements in this performance area are intended to be implemented and assured at the corporate level, however, where feasible, they may be implemented and assured at the Facility level,” regarding level 1.2 Sustainability Reporting. With respect to TCM 3.0, which calls for disclosure at the site level, under the new consolidated standard could it only be reported at the corporate level?

Performance Area 15: Cultural Heritage

COMMENT:

En el Área de Desempeño 15: Patrimonio cultural, se señala “Cuando exista el riesgo de afectar negativamente al patrimonio cultural, llevar a cabo un análisis de alternativas que den prioridad a evitar impactos adversos sobre el patrimonio cultural mediante cambios en el diseño de la Instalación o procedimientos operativos y de construcción”, sin embargo, muchas veces trabajamos con emplazamientos que empezaron a operar hace más de 100 años, donde no se consideraban estos temas, cómo podemos abordar este requisitos?

TRANSLATION:

In Performance Area 15: Cultural heritage, it states “When there is a risk of adversely affecting cultural heritage, conduct an analysis of alternatives that prioritize avoidance of adverse cultural heritage impacts through the Facility’s design changes and/or construction and operational procedures.” However, we often work with sites that began operating over 100 years ago, when these issues were not considered. How can we address this requirement?

Performance Area 17: Grievance Management

COMMENT:

En el nuevo estándar se señala que el mecanismo de quejas debe ser diseñado de forma colaborativa con las partes interesadas y titulares de derechos ¿Qué grado de participación es necesaria para este diseño? ¿Cómo se espera que sea esta partición? Considerando que la mayoría de los sitios ya cuentan con un mecanismo de quejas establecidos.

TRANSLATION:

The new standard states that the grievance mechanism must be designed in a collaborative manner with stakeholders and rights holders. How much participation is required in designing this? What is this participation expected to look like? Considering that most sites already have a grievance mechanism in place.

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: 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

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