

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

South Africa

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Other: mining

ORGANISATION

Anonymous

COMMENTS & QUESTIONS BY DOCUMENT

Document:
Assurance

3. Who Can Conduct External Assurance?

SECTION: General Comment

COMMENT:

Assurer onboarding has been a major sticking point with other standards. Given the anticipated take-up of the standard, we highlight that this is an area where acceleration is required

4. Consolidated Standard External Assurance Process

SECTION: 4.2 Planning, 4.2.14 Assurance Plan

COMMENT:

A timeframe for assurance plan submittal is required

SECTION: 4.2 Planning, 4.2.3 Media Scan

COMMENT:

Organisations should have the option to challenge the results of the media scan as these may be biased

SECTION: 4.3 Execution of Facility Assessment, 4.3.3 Interviews

COMMENT:

Feedback from stakeholders should be verified prior to becoming a finding

SECTION: 4.3 Execution of Facility Assessment, 4.3.5 Non

COMMENT:

Clarity is required as to whether assurance provider should revisit the site to verify corrective actions

Document:
Standard

General comment on Performance Area

COMMENT:

We acknowledge that many of comments made previously have been incorporated into the standard

We highlight areas where clarity is required, general comments and inputs on assurance process

COMMENT:

Areas where clarity is required: Clarity is needed on corporate vs facility level disclosure requirements, noting that facility-level disclosure may add to the reporting burden

COMMENT:

Access to adequate food- there are some industrial areas where food not permitted, and the standard needs to accommodate this

COMMENT:

The standard needs to accommodate physical ability assessment as required by law.

COMMENT:

Compliance with the standard requires disclosure of sensitive plans (for example a crisis response plan). We require clarity that the disclosure of such plans would be to the auditors only

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Leading Practice, 3

COMMENT:

Areas where clarity is required: Performance standard 1, leading practice 3. Clarity is required as to what local efforts would be acceptable in non-EITI implementing countries.

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: Glossary and Interpretive Guidance

COMMENT:

Areas where clarity is required: Clear definition of psychological safety and respectful workplace is required as this could differ by region and is open to interpretation
