

CMSI Consultation Response

Respondent Details

NAME

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COUNTRY

United Kingdom

PERMISSION

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

STAKEHOLDER

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

ORGANISATION

IWIM

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: No Response

Document:
Assurance

General Comment

COMMENT:

Assurance Framework (General Requirements)

PA1 - Transparency & Accountability

PA17 - Grievance Management (links to evidence quality)

Two areas of the Assurance Process would benefit from strengthening. First, the current model places heavy reliance on facility-provided information, which limits independence and reduces assurance credibility. The Standard should require a proportion of evidence to come from external verification, participatory engagement, and independent data sources.

Second, the multi-year cycles between assurance assessments reduce responsiveness and provide limited incentives for continuous improvement. We recommend introducing interim performance check-ins or progress reviews, and creating recognition mechanisms for Facilities that demonstrate improvements between full assurance cycles.

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:

Cross-cutting across all performance areas:

LGBTIQA+ and hostile legal environments: the Standard frequently notes to act in line with jurisdictional law; some data collection limitations referenced "Act in line with law" could be used to avoid protections for sexual and gender minorities in criminalising contexts without mitigation.

Where national law criminalises LGBTIQA+ identities, we recommend Facilities must still implement protective measures: non-outing policies, confidential access to services, third-party reporting options, legal risk assessments, and advocacy/engagement plans. Documentation of mitigation steps and PIA must be provided to assurance providers. Duty of care exists even in hostile legal environments; mitigation is essential to protect people. (UN Free & Equal; UNGPs)

COMMENT:

Cross-cutting –Grievance reporting & public disclosure: Public reporting and transparency is required across Performance Areas at various levels.

We recommend that Public disclosure protocols are adopted to ensure no personal identifying information of complainants/survivors is disclosed and that aggregated SGBV indicators may be reported only in anonymised form and accompanied by information on remedial actions and budgets allocated to SGBV responses. This balances transparency with victim safety. (WHO & UN guidance on GBV data)

COMMENT:

We note that the ICMM Social and Economic Reporting Framework adopted in 2022 provides robust, industry-leading workforce and social benefit indicators including disaggregated workforce composition, pay equality, wage level, training/skills, local procurement. The current CMSI draft (October 2025) appears to fall short in consistently requiring these same indicators (for both direct and contractor workforces, for local workforce/skills programmes, for disaggregation by gender and ethnicity and for gender-owned local procurement). This is something we had already shared during the first consultation.

We recommend that CMSI adopt the ICMM eight core indicators as minimum mandatory standards under the relevant Performance Areas (e.g., workforce & benefits, procurement, training). Specifically:

- Require workforce composition data disaggregated by gender, age, contract type (direct/contractor) and Indigenous/minority status.*
- Require pay equality ratio (women to men) by employee category, and entry-level wage vs living wage by gender.*
- Require training/skills programmes with targets for women and marginalised genders and disaggregation of outcomes.*

- *Require local procurement metrics including % spent with women-owned or gender-inclusive local businesses.*
- *Require contractor/sub-contractor reporting to same indicators, and assurance/audit of those data.*
- *Require transparent public reporting of these indicators annually, with narrative on gaps and corrective actions.*

Rationale:

By aligning with the ICMM Framework you ensure CMSI remains at global best practice, supports comparability across companies and jurisdictions, and strengthens the link between mining operations and meaningful socio-economic benefits (especially for women and marginalised genders). It also helps fulfil gender mainstreaming by making data, targets and accountability explicit.

Performance Area 01: Corporate Requirements

SECTION: 1.1 Corporate Accountability, Leading Practice, 1

COMMENT:

PA 1.1 LP1.1 - Currently "Integrate sustainability metrics linked to meeting the Good Practice or Leading Practice of this Standard into senior executive compensation" - recommendation: compensation sustainability metrics to include aspects of all ESG areas including certain DEI KPIs.

SECTION: 1.2 Sustainability Reporting

COMMENT:

1.2 - Integrate ICMM Indicator 8 of country-by-country tax / payments transparency: "Entities shall publish payments and tax contributions on a country-by-country basis, aligned with recognised transparency standards, and reflect how these contributions support gender-responsive community development."

PA 1.2 - Integrate ICMM Indicator 1 of Workforce composition into Sustainability Reporting: "Entities shall report workforce composition disaggregated by gender (female/male/other/prefer-not-say), age bands, contract type (direct/contractor), and Indigenous/minority status. The baseline data shall be gathered at facility level and updated annually"

SECTION: 1.3 Transparency of Mineral Revenues

COMMENT:

A 1.3 could be further strengthened by moving the provision for Facilities in an EITI implementing country to publicly disclose relevant information required by national EITI implementation beyond material payments from Towards Good Practice to Good Practice and including a requirement for Facilities in an EITI country to constructively engage with the EITI process. This would reinforce CMSI's commitment to transparency and reduce fragmentation across standards.

Performance Area 03: Responsible Supply Chains

SECTION: 3.1 Responsible Supply Chain (applicable to all Facilities)

COMMENT:

PA3.1 Requirements exists but do not mandate gender clauses in contractor contracts or annual gender audits of suppliers; this is needed to prevent outsourcing of harms. "Facilities must include mandatory gender & SGBV clauses in contracts with direct contractors (non-discrimination, anti-harassment, provision of grievance access), require contractor staff training on DEI & SGBV, and conduct annual gender audits of contractors. Findings must be included in corrective action plans and publicly reported in aggregated form." This is because contractors can cause gendered harm and contractual obligation and verification should be in place to avoid this. (OECD Due Diligence)

PA 3.1 - Integrate ICMM Indicator 5 of socio-economic benefit framework on local procurement. "Entities shall report the proportion of total procurement spend with locally-based suppliers, and the proportion of procurement spend with women-owned or gender-inclusive local businesses. Entities shall set targets for increasing women-owned business participation." - By aligning with the ICMM Framework you ensure CMSI remains at global best practice, supports comparability across companies and jurisdictions, and strengthens the link between mining operations and meaningful socio-economic benefits (especially for women and marginalised genders). It also helps fulfil gender mainstreaming by making data, targets and accountability explicit.

Performance Area 04: New Projects, Expansions and Resettlement

SECTION: 4.2 Land Acquisition and Resettlement, Good Practice, 1

COMMENT:

PA 4.2 GP1 Resettlement planning must include a gendered land and asset baseline (ownership, access, control data disaggregated by gender) and guarantee gender-equitable replacement options (joint and individual titling as appropriate). Resettlement action plans must include confidential case management for SGBV survivors, safe housing options with privacy, and livelihood restoration programmes specifically designed for women (skills, microfinance, childcare provisions). Where physical and/or economic displacement is unavoidable, develop and implement a gender-responsive resettlement action plan (RAP) and, if applicable, a livelihood restoration plan, in line with IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement, in consultation with affected stakeholders and rights-holders including women.

SECTION: 4.2 Land Acquisition and Resettlement, Leading Practice, 1

COMMENT:

PA 4.2 LP1 - Co-design and implement programmes that improve the livelihoods and standard of living of displaced people with affected stakeholders and rights-holders including women.

SECTION: 4.2 Land Acquisition and Resettlement, Towards Good Practice, 4

COMMENT:

PA 4.2 TGP 4 - Lists resettlement requirements but not detailed gendered asset baseline. Resettlement often overlooks women's land/asset rights, informal livelihoods and specific SGBV risks during relocation. Conduct a socio-economic baseline study and impact assessment for communities potentially affected by involuntary physical and/or economic displacement by gender.

Performance Area 05: Human Rights

SECTION: 5.1 Human Rights

COMMENT:

PA5.1 HRDD language doesn't prescribe SGBV-safe methods, survivor-centred remediation, nor gatekeeper/power mapping (household, community leaders) that block women's participation. Therefore we recommend that HRDD must include a gender and intersectional risk analysis that: (a) maps gatekeepers and power dynamics (household heads, elders, customary authorities) which may restrict access for women and marginalised genders; (b) identifies availability and capacity of SGBV response services within the area of influence; (c) applies SGBV-safe data collection protocols and uses trained, gender-competent enumerators; (d) develops survivor-centred remediation pathways (medical, psychosocial, legal, livelihood support) with timebound actions. HRDD without operational SGBV safeguards can expose survivors and fail to mitigate gendered harms. (UNGPs; IASC GBV Guidelines)

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Good Practice, 4

COMMENT:

PA 7.1 GP4 - Integrate ICMM Socio-Economic Indicator 2. Currently gender-neutral: "Entities shall conduct a pay-equality analysis by gender and other relevant diversity dimensions for equivalent roles, and publish the ratio of women's median pay to men's median pay, with targets to eliminate pay gaps within 3 years of baseline."

SECTION: 7.1 Rights of Workers, Leading Practice, 3

COMMENT:

PA 7.1. LP3/LP4 -Integrate ICMM Socio-Economic Indicator 3

Currently in Leading Practice, should be in Good Practice.

"Entities shall benchmark entry-level wages for direct and contractor workers against the local living wage and pay at or above the living wage within 24 months. Data shall be disaggregated by gender and employment type."

SECTION: 7.1 Rights of Workers, Leading Practice, 5

COMMENT:

PA 7.1 LP5 Recommendation to define annual leave and compassionate leave and to include in Good Practice not in Leading Practice.

"Provide workers with social benefits that exceed statutory requirements for two or more of the following: 1) annual leave, 2) parental leave 3) sickness and compassionate leave, 4) pension contributions. "

For example, annual doesn't exist as such in the US (would be called 'vacation days' and it isn't necessarily annual), so would need to be defined.

SECTION: 7.1 Rights of Workers, Leading Practice, 7

COMMENT:

PA 7.1 LP7 -The right to vote is a fundamental right therefore this should be in Towards Good Practice: Provide time off to workers to exercise their political rights, such as their right to vote.

SECTION: 7.1 Rights of Workers, Towards Good Practice, 1

COMMENT:

PA 7.1 TGP 1 Currently no requirement for gender-balanced worker representation bodies.

Worker representative bodies and bargaining units at Facility level must actively seek gender balance in membership and leadership; where women are underrepresented, Facilities must implement outreach, quotas or alternate representation mechanisms to ensure meaningful participation. Representative structures must include women to influence workplace decisions. Contractors/informal workers face higher risks. (ILO core conventions; ILO R206)

SECTION: 7.2 Grievance Mechanism for Workers (Employees and Contractors), Leading Practice

COMMENT:

PA 7.2 - Apply a trauma-centric approach to grievances - either from GP and at least in LP.

SECTION: 7.2 Grievance Mechanism for Workers (Employees and Contractors), Towards Good Practice, 2

COMMENT:

PA 7.2 TGP 2 -No guarantee that contracted/informal workers (e.g., canteen, transport) have equivalent access and protections.

Facilities must explicitly extend rights and grievance access to all regularly present indirectly-employed and contracted workers (including informal roles) and demonstrate regular inclusion of these groups in HR records and training.

Performance Area 08: Diversity, Equity, and Inclusion

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

COMMENT:

PA 8.1 GP1/ GP3 / GP6 - Requires public DEI commitment, DEI strategy, objectives/targets for representation among leadership. "The Facility shall (a) include gender targets across levels (board, management, workforce); (b) mandate sex and gender identity data collection standards and protections; (c) require timebound action plan for gender pay equity. The corporate DEI strategy shall set timebound, measurable gender targets (including for women, trans and non-binary people where safe to collect) for Board, senior leadership and facility workforce, and require a gender pay equity review with corrective plan to be completed within 12 months of baseline. The Standard requires a defined minimum set of disaggregated categories (sex assigned at birth; gender identity where safe; age brackets; ethnicity/Indigeneity; disability) and mandatory data protection measures (informed consent, retention limits, anonymisation, privacy impact assessment). Where collection of gender identity is legally constrained, the Facility must document the legal risk and apply alternative protective measures (confidential survey routes, third-party collection, PIA) and still report anonymized indicators." This is recommended because explicit targets, pay equity and safe data standards make DEI auditable and prevent tokenism. (CEDAW; ILO C190; UNGPs)

SECTION: 8.2 Management of Diversity, Equity, and Inclusion (Facility Level), Towards Good Practice, 4

COMMENT:

PA 8.2 TGP 4&5

A. Requires baseline data on worker diversity metrics relevant to the Facility and there is no guidance on collecting gender identity safely or on how to treat sensitive data (LGBTIQA+).

B. Minimum data methodology: sex (female/male/other/prefer not to say), gender identity (optional, where safe), age bands, indigeneity status, disability, and employment type (direct/contractor/ASM).

C. Facilities must apply a Data Protection Protocol for sensitive data (consent form, anonymisation, PIA) and document reasons where a category is not collected.

These 3 recommendations will prevent inconsistent reporting and protects vulnerable groups.

Performance Area 09: Safe, Healthy and Respectful Workplaces

SECTION: 9.1 Health and Safety Management, Good Practice, 2

COMMENT:

PA 9.1 GP2 Insert: Establish communication system or alarms to report safe/unsafe operations

SECTION: 9.1 Health and Safety Management

COMMENT:

PA 9.1 TGP 6 / GP2

A. PPE must be fit for purpose and gender appropriate;

B. PPE procurement and distribution must include consultation with women and gender-diverse workers and documented fit testing for female-sized PPE.

C. Include mention of Sexual Reproductive Health (SRH): maternity, antenatal referrals, breastfeeding, menstrual hygiene requirements;

D. Facilities must provide SRH support: paid maternity leave meeting or exceeding national standards, pregnancy risk assessments and alternative duties, breastfeeding breaks and private lactation spaces, access or referral to antenatal and emergency obstetric care, and menstrual hygiene management (MHM) in all female and all-gender restrooms.

The 4 recommendations above are made because fit testing and SRH supports improve safety and retention of women workers. (ILO Maternity Protection C183; WHO SRH)

SECTION: 9.1 Health and Safety Management, Towards Good Practice

COMMENT:

PA 9.1 TGP Although pregnant workers are mentioned in PA 7.1 GP10 important to mention under health & Safety management also. Create provisions to ensure pregnant women and those who have a chronic illness are not exposed to certain hazards at certain periods or for a specific time per necessity.

COMMENT:

PA 9.1 TGP 3/4

Set up and periodically review a health and safety risk assessment process that takes into account gender differences when it comes to tasks, hazards, health, risks etc. with special attention to minority or vulnerable groups.

SECTION: 9.3 Training, Behaviour and Culture, Good Practice

COMMENT:

PA 9.3 GP3/4 - *This is not enough & shouldn't sit within culture & behaviour. See suggested strengthening of 9.1 TGP 3/4: "Establish mechanism(s) for the participation of underrepresented and marginalised groups to identify, assess and address occupational health and safety risks that disproportionately affect such groups."*

SECTION: 9.3 Training, Behaviour and Culture, Towards Good Practice, 2

COMMENT:

PA 9.3 TGP 2 : *Add bystander training and how to monitor/witness/report incidents & mental health basics*

"Provide training on the fundamentals of psychological safety, respectful behaviour, identification of psychosocial hazards, and assessment of psychosocial risks, and maintain training records. Add bystander training and how to monitor/ witness/ report incidents as well as mental health basics."

SECTION: Glossary and Interpretive Guidance

COMMENT:

PA 9 - *Add to references: ILO, Addressing gender-based violence and harassment in a work health and safety framework - <https://webapps.ilo.org/static/english/intserv/working-papers/wp116/index.html>*

Performance Area 10: Emergency Preparedness and Response

SECTION: Glossary and Interpretive Guidance

COMMENT:

PA 10 - *Add guideline in references:*

** ILO Conventions 176*

** OHSAS 18001*

** United Nations Environment Programme. Preparedness for Emergencies at the Local Level (APELL) for Mining, http://apell.eecentre.org/Modules/GroupDetails/UploadFile/APELL_Handbook_2016_-_Publication.pdf*

Performance Area 11: Security Management

SECTION: 11.1 Security Management, Towards Good Practice, 2

COMMENT:

PA 11.1 TGP 2 - *In the Facility's security risk assessment include special attention to risks to women, children, LGBTQIA+ communities etc. If the Facility is in a conflict-affected or high-risk area (CAHRA), the security risk assessment should include a conflict analysis as well.*

Performance Area 12: Engagement

SECTION: 12.1 Engagement

COMMENT:

PA12 For the Engagement to be inclusive and culturally appropriate, require women's participation by paying attention to timing, childcare, female facilitators, language) and map barriers to participation for marginalised genders.

"Stakeholder engagement plans must include a Participation Access Plan that: (a) identifies barriers limiting participation by women and marginalised genders; (b) schedules consultations at times and locations accessible to women (e.g., not only during working hours); (c) offers childcare, transport or compensation for time; (d) ensures female facilitators and interpreters are available; (e) undertakes separate women-only consultations where appropriate and safe."

This should be included because barriers to participation mean consultation is not meaningful or representative. (UN Women guidance; OECD due diligence)

Performance Area 13: Community Impacts and Benefits

SECTION: 13.1 Community Impact Management

COMMENT:

Recommendation for Facilities to link to the results of the ESIA (discussed in a prior performance area)

SECTION: 13.2 Community Development and Benefits, Good Practice

COMMENT:

PA 13.2 GP 6-9 Community Development & Benefits. Recommendation to insert ICMM socio-economic benefit indicator 7

"Entities shall invest in local institutional and governance capacity building (community organisations, local government, women's organisations), with progress reported disaggregated by gender-participation and roles."

This is currently only stated indirectly in LP 6 and should be more explicit and move to good practice.

Performance Area 14: Indigenous Peoples

SECTION: 14.1 Indigenous Peoples

COMMENT:

PA14 Although FPIC and Indigenous engagement is emphasised there is currently no explicit requirement to ensure Indigenous women's voices are separately sought and protected; be aware that customary leadership may exclude women and Indigenous women can be sidelined in customary governance; therefore Engagement and FPIC processes must explicitly ensure women, girls and gender minorities within Indigenous communities are consulted separately and their free, prior and informed consent recorded.

Proposed wording: "Indigenous women's leadership and representation must be sought in decision-making and benefit sharing negotiations; where cultural norms constrain participation, alternative safe mechanisms for eliciting consent must be used."

(UNDRIP; CEDAW General Recommendation 34)

Performance Area 17: Grievance Management

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

COMMENT:

PA 17.1 GP 6 - Gender disaggregate data: "Report to management on the number and types of issues and concerns raised through the grievance mechanism by gender and types of actions taken in response, resolution and/or remediation of such issues, considering provisions for confidentiality and protection of complainants."

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

COMMENT:

PA 17.1 LP1 No mention of power imbalances and mechanisms for them to be corrected or reported against. Proposed wording: "Collaboratively design or integrate improvements to the grievance mechanism with stakeholders and rights-holders, considering the needs, values and cultures of vulnerable and marginalised groups also taking into account power imbalances."

SECTION: 17.1 Grievance Mechanism for Stakeholders and Rights

COMMENT:

PA17.1 CMSI requires accessible grievance mechanisms for external stakeholders and lacks an explicit SGBV pathway: confidential/third-party reporting, survivor choice, protected handling, immediate safety measures and specialist referrals.

Proposed new wording: "Facilities must implement confidential, survivor-centred complaint channels for SGBV accessible to all affected people (including women, LGBTIQ+ persons etc) –e.g., third-party helpline, on-site confidential caseworker or accredited external provider. The mechanism must guarantee anonymity where requested, immediate protective measures within 48 hours (safe shelter, medical care, paid leave), documented referral pathways to specialist SGBV services and survivor choice on remedial route. Records must be securely stored with strict access controls."

Survivor-centred grievance handling is standard good practice and reduces re-traumatisation. (IASC GBV Guidelines; UNGPs)

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

COMMENT:

PA17.1 TGP 1 Ensure grievance mechanisms are impartial

"Publicly commit to managing grievances impartially in a manner accessible to stakeholders and rights-holders and enables access to remedy."

Performance Area 18: Water Stewardship

SECTION: 18.2 Collaborative Watershed Management, Leading Practice, 3

COMMENT:

PA 18.2 LP3d - Be more explicit by including rights holders and local communities to assist in the water monitoring

SECTION: 18.2 Collaborative Watershed Management

COMMENT:

PA 18.2 Recommendation to assess gendered water uses (women/girls collect water) or time-poverty impacts and risks; also the monitoring insufficiently gendered.

Water assessments must include gendered use analysis (who collects water, how changes alter daily time burdens), require mitigation measures reducing women's water collection burden (new water points, protected wells), and include gender-disaggregated water access indicators in monitoring. This is because water burdens disproportionately affect women and girls; addressing this reduces gender inequality. (UN Water; SDG 6/5 nexus)

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice, 4

COMMENT:

PA19.1 GP1 GP4 Biodiversity management plans required; no explicit reference to gendered livelihood dependencies: Women's livelihood activities (foraging, medicinal plants, small-scale fisheries) may be omitted in assessments and mitigation.

"Biodiversity and ecosystem services assessments must map livelihood dependencies by gender and include mitigation and benefit measures targeted to women's livelihoods (e.g., livelihood restoration, access to resources, training)."

This will ensure no net loss commitments account for gendered use of nature. (CBD gender plan)

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Leading Practice, 3

COMMENT:

PA 19.1 LP3 Be more explicit by including rights holders and local communities to assist in the environmental monitoring

Performance Area 21: Tailings Management

SECTION: 21.1 Tailings Management

COMMENT:

PA 21 -Add a requirement for the Facility to have the obligation to periodically inform and update affected communities on the tailings dams around them and provide a space for dialogue and a mechanism where the local community can share concerns.

Performance Area 22: Pollution Prevention

SECTION: 22.1 Non, mineral Waste and Hazardous Materials Management, Good Practice

COMMENT:

PA 22.1 GP1 -include stakeholders and local communities to be informed and become active participants in risk plans development and allow them to monitor and uphold the company on its plans

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 1

COMMENT:

PA 24.1 GP1 Closure often erodes women's economic opportunities if not planned gender-specifically; Current clause doesn't have a requirement for gendered legacy planning.

Proposed wording: "Closure plans must include gender-responsive socioeconomic transition programmes: skills training, access to finance/business support for women, social services continuity, and monitoring of gendered social outcomes for 5 years post-closure."

Rationale: Closure without a gender lens exacerbates long-term inequalities.

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: 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: No Response