

# CMSI Consultation Response

## Respondent Details

NAME

Jim Hietala

COUNTRY

United States

PERMISSION

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

STAKEHOLDER

Other standard setting body

ORGANISATION

The Open Group

## 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

### 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

## Performance Area 20: Climate Action

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

COMMENT:

*20.1 Corporate Climate Change Strategy (Corporate Level) (pg. 134)*

*Leading practice, consider adding an item 8, Adopt a standard emissions data model for emissions data, such as the Open Footprint Data Model Standard, to ease reporting of scope 1,2,3 emissions against various regulations requiring disclosure, and to ease sharing of emissions data throughout your value chain.*

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SECTION: 20.2. Climate Change Management (Facility Level), Leading Practice, 2

COMMENT:

*20.2 Corporate Climate Change Strategy (Facility Level) (pg. 136)*

*Leading practice 2, consider adding “, and encourage suppliers to adopt a standard emissions data model, such as the Open Footprint Data Model Standard, to ease sharing of scope 3 data.”*

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SECTION: 20.3. Annual Climate Change Public Reporting, Leading Practice

COMMENT:

*20.3 Annual Climate Change Public Reporting (pg. 137)*

*Consider adding the following as an additional (3rd) leading practice:*

*Leading Practice: 3. Utilize a standard emissions data model, such as the Open Footprint Data Model Standard, to house emissions data, and ease reporting against multiple regulations in multiple geographies and jurisdictions.*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*Glossary and Interpretive Guidance (pg. 137)*

*Consider adding a definition to Glossary and Interpretive Guidance (pg. 137), Standard emissions data model: A data model, developed by a recognized, open, vendor-neutral standards organization, that provides standard data field and metadata definitions and corresponding entity relationship diagrams for entity, location, and emissions data. The data model operationalizes emissions data inside of corporate IT data infrastructure. A standard emissions data model such as the Open Footprint Data Model Standard, built upon the GHG Protocol definitions, and fully aligned with the WBCSD PACT framework for product carbon footprint, eases information sharing throughout value chains, and eases the emissions reporting burden.*

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COMMENT:

*Consider adding the italicized/bolded text below on pg. 139: Internationally recognised frameworks (for measuring and reporting GHG emissions): These may include the World Resource Institute (WRI) GHG Protocol, ISO standards, Open Footprint Data Model Standard, and other recognised frameworks. Methods required by regulation may also be used.*

*References (pg. 141)*

*Add a reference to Open Footprint Forum: Open Footprint Data Model Standard*

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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:

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:

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: No Response

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