

# CMSI Consultation Response

## Respondent Details

NAME

Shane Borchardt

COUNTRY

Canada

PERMISSION

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

STAKEHOLDER

Industry (upstream)

ORGANISATION

Cameco

## 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: 2: Below expectations

This is goes substantially above and beyond the MAC TSM. Most of the work, such as additional disclosure, does nothing to improve performance. This effort is better directed toward activities that improve performance.

### 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: 2: Below expectations

The standard seems to abandon the performance improvement model of TSM. Instead it focusses more on customer/stakeholder communication.

Document:  
Assurance

### 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**

SECTION: 1.1 Corporate Accountability, Good Practice, 2

COMMENT:

*Isn't this shown through assessment of all the other indicators. This seems like an unneeded requirement.*

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SECTION: 1.2 Sustainability Reporting, Good Practice, 1

COMMENT:

*The term "report in line" would need to be further defined. Would this mean fully aligning with one of the listed frameworks? If so, this would require a great amount of resources.*

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SECTION: Intent

COMMENT:

*CMSI requires sustainability report in line with and international recognized reporting standard. These international recognized reporting standards have dedicated much more time and energy in determining what stakeholders want reported. However, the CMSI also has numerous reporting requirements throughout the complete standard. Although we have a sustainability report in line with SASB and meet MAC TSM reporting requirements, we do not currently disclose many of the line items required as part of the CMSI. The level of effort to meet these individual disclosure requirements is substantial. Given that none of our stakeholders are currently asking for the information, this seems like unneeded effort.*

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## **Performance Area 04: New Projects, Expansions and Resettlement**

SECTION: 4.1 Environmental and Social Impact Assessments

COMMENT:

*Suggest PA 4.1 applies to new (i.e., greenfields) projects; expansions in brownfields locations (i.e. existing sites) should not be included given the amount of information collected and reported on.*

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## **Performance Area 08: Diversity, Equity, and Inclusion**

SECTION: 8.1 Governance of Diversity, Equity, and Inclusion (Corporate Level), Towards Good Practice, 3

COMMENT:

*the term "strategy" is out of sync with the rest of the document. Could process be used instead?*

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## **Performance Area 09: Safe, Healthy and Respectful Workplaces**

SECTION: Glossary and Interpretive Guidance

COMMENT:

*The definition of Industrial Hygiene is too broad. As defined this includes all safety hazard, including conventional hazards like fall from heights. Suggest "...and controlling of environmental factors or stresses in the workplace that could cause...."*

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## Performance Area 12: Engagement

SECTION: 12.1 Engagement, Towards Good Practice, 2

COMMENT:

*“stakeholders” is defined in an overly broad manner, which includes individuals indirectly affected. This application should be narrowed within criteria 2 to just identify stakeholders and rights-holders that are directly affected. Moving beyond this to those potentially affected and those who are merely interested creates an unmanageable process that diverts resources away from impacted stakeholders.*

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## Performance Area 14: Indigenous Peoples

SECTION: Applicability

COMMENT:

*Reference to human rights due diligence aligned with UN Guiding Principles on Business and Human Rights (UNGPR) doesn't make sense in Canada.*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*This PA has a note that suggests consent is required in agreements. However, definitions at the end of the PA conflict with the note which indicate that agreements do not have to reflect consent. There is inconsistency throughout this PA related to consent and what FPIC is that will make it both difficult to comply with and to verify this PA*

*Additionally, the withdrawing of consent is contemplated by the definition of Agreement. If consent can be withdrawn, then this implies that consent is required. Again, this is an inconsistency within this PA that make it unworkable from a practical perspective. Both consent and the withdrawing of consent should not be requirements of this PA*

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COMMENT:

*Independent mechanisms are very tough for this PA.*

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## Performance Area 17: Grievance Management

SECTION: Glossary and Interpretive Guidance

COMMENT:

*The definitions contemplate avenues of redress and remedies such as apologies, restitution, rehabilitation, financial or nonfinancial compensation, etc., which will generally be unworkable for most companies*

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SECTION: Intent

COMMENT:

*The statement of intent is overly broad and refers to the ability of stakeholders and rights-holders to “raise issues or concerns” and have them resolved by implementing a grievance mechanism to be established in*

accordance with the effectiveness criteria of UNGP Principle 31. This should be narrowed to specific human rights violations and not just “issues and concerns” generally

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

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice, 5

COMMENT:

*No net-loss is an extremely ambitious target and should be moved to leading. Even if not feasible, the reporting that this would take would be substantial. All remaining references to no net-loss should be removed.*

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SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Towards Good Practice, 6

COMMENT:

*assessing ecosystem services risks goes well beyond current practices. This is more of a leading practice. Given the broad definitions for “ecosystem services” and “area of influence”, this would not be conducted as part of routine operations.*

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SECTION: Glossary and Interpretive Guidance

COMMENT:

*We see Ecosystem Services as a risky term that is very subjective and has potential to become a catch-all for anything that a person or group disagrees with. As defined it appears it could encompass anything that makes someone feel less “good” about a place or thing, as such is not a quantifiable metric.*

*We suggest moving to language “risks and impacts from the Facility’s operational activities and infrastructure, on people and the environment (including soil, flora, fauna, and water bodies)” or to similar language as MAC TSM utilizes in the definition of biodiversity.*

*If the term ecosystem services is maintained, the definition needs to focus on significant impacts. The current definition was derived using a global/regional perspective; however, it is not clear how it would be utilized at the facility or watershed level.*

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COMMENT:

*Definition of Area of Influence:*

*Part b makes definition unworkable*

*o MAC is heavily promoting road and infrastructure in Canada’s north, which would allow further mining, but will have reach far beyond the mine sites. This standard makes these types of “nation building initiatives” less likely.*

*o Items being referenced (e.g., Indigenous Protected and Conserved Areas) do not have established governance structures; it is not clear how these initiatives could be considered in this definition.*

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COMMENT:

*The term Biodiversity Values is overly broad. Areas identified as important by stakeholders in some cases could cover vast regions of the province.*

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## Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Leading Practice, 3

COMMENT:

*Offsets are usually purchased at a corporate level, which would make reporting at a facility level difficult.*

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## Performance Area 22: Pollution Prevention

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

COMMENT:

*Assessing hazards and risks of all hazardous materials is too broad. Should be limited to bulk or significant. If the SDS system is sufficient to satisfy this requirement, then there should be a FAQ to clarify this.*

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SECTION: 22.7 Noise, Vibration and Light Pollution/Nuisance, Towards Good Practice, 2

COMMENT:

*"Establish baseline data on different types of noise, vibration, or light from a defined reference date" is another foundational practice that goes well beyond current requirements. Unclear as to how a proponent would even establish baseline vibration data.*

*This information should be required for greenfields (i.e., new) facilities; however, given the amount of environmental data collected and reported on already existing facilities should not be included.*

*Perhaps should make existing operations, or locations in remote areas, as NA*

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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: 2: Below expectations

Scope is too broad and covers all topics that may be seen as important in some mining sectors, however, many are not applicable for other mining sectors. This creates the need for all companies to comply, even when they are not important.

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