

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Canada

PERMISSION

Yes, CMSI can disclose my anonymous feedback.

STAKEHOLDER

Industry (upstream)

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: 4: Exceeds 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: 4: Exceeds expectations

Document:
Assurance

QUESTION 1

From your perspective, does the Assurance Process meet your expectations of a robust, credible, replicable and transparent approach?

Response: 4: Exceeds expectations

Document:
Standard

Performance Area 03: Responsible Supply Chains

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

COMMENT:

Human rights training of suppliers could be another requirement under Good Practice of this Performance Area.

Performance Area 05: Human Rights

SECTION: 5.1 Human Rights, Towards Good Practice, 3

COMMENT:

Language could be added in regard to the grievance mechanism not only receiving and tracking human rights but also tracking resolution rate of human rights grievance.

COMMENT:

The Standard could add some guidance how companies should be expected to interact with government authorities—especially at the local level—when those actors are involved in or contribute to human rights risks.

Performance Area 07: Rights of Workers

SECTION: 7.1 Rights of Workers, Good Practice, 7

COMMENT:

We think the language should be revised to indicate that first and foremost, local law should be followed and prevails over any other language under this specific requirement. Working hours must be governed by local legislation and not as a general/universal rule. In many jurisdictions, legislation allows for the management of atypical working hours. In the different countries where we operate, we cannot now or in the future meet the expectation of the suggested universal guideline currently defined under this requirement.

SECTION: 7.1 Rights of Workers, Good Practice, 8

COMMENT:

We think the language should be revised to indicate that first and foremost, local law should be followed and prevails over any other language under this specific requirement. Rest periods must be governed by local legislation and not as a general/universal rule. In many jurisdictions, legislation allows for the management of atypical working hours and rest periods. In the different countries where we operate, we cannot now or in the future meet the expectation of the suggested universal guideline currently defined under this requirement.

SECTION: 7.1 Rights of Workers, Good Practice, 9

COMMENT:

We think the language should be revised to indicate that first and foremost, local law should be followed and prevails over any other language under this specific requirement. Overtime must be governed by local legislation and not as a general/universal rule. In many jurisdictions, legislation allows for the management of atypical working hours and specific issues related to overtime. In the different countries where we operate, we cannot now or in the future meet the expectation of the suggested universal guideline currently defined under this requirement.

SECTION: 7.1 Rights of Workers, Leading Practice, 4

COMMENT:

We suggest adding some language to the effect that this information would only be shared when legislation allows it. In many countries, it is not public knowledge.

Performance Area 18: Water Stewardship

SECTION: 18.3 Water Reporting, Towards Good Practice, 1

COMMENT:

Item d) what the main discharges are - This is a potential legacy for older sites. We believe it is more appropriate for "Good Practice" level.

Performance Area 19: Biodiversity, Ecosystem Services and Nature

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Good Practice, 1

COMMENT:

In regard to the last sentence (...offer alternative provision of services...), what criteria would guide the selection and evaluation of such alternatives?

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Leading Practice, 2

COMMENT:

Difficult in practice because "nature considerations" is vague. It is an important clause but may be difficult for leaders to implement without more clarity.

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Towards Good Practice, 3

COMMENT:

1. What if the nearest World Heritage Site is very far from the facility? Is this still needed if the facility or operations have no chance of impacting a WHS or protected area?

2. The glossary defines buffer zones as transition areas, but it doesn't specify a radius or clear boundaries. Are buffer zones typically predefined as part of the protected area designation, or would sites be expected to delineate them independently? Buffer zone could be better defined "The region adjacent to the border of a protected area; a transition zone between areas managed for different objectives."

SECTION: 19.1 Biodiversity, Ecosystem Services and Nature, Towards Good Practice, 7

COMMENT:

In regards to developing a biodiversity management plan that prioritizes action - Proof of prioritization may be subjective. What type of evidence is expected to demonstrate that prioritization of actions has occurred?

SECTION: Glossary and Interpretive Guidance

COMMENT:

Buffer zone could be better defined "The region adjacent to the border of a protected area; a transition zone between areas managed for different objectives."

Performance Area 20: Climate Action

SECTION: 20.1 Corporate Climate Change Strategy (Corporate Level), Good Practice, 2

COMMENT:

The mention of WRI GHG Protocol is the only mention in the document. WRI GHG should be defined in the glossary.

SECTION: 20.3 Annual Climate Change Public Reporting, Good Practice, 2

COMMENT:

We believe this requirement should be moved to LEADING PRACTICE level, instead of Good Practice.

Our rationale is to maintain consistency with other sections where independent assurance of data is required, more specifically:

1.2 Sustainability Reporting, Leading Practice 2. - GHG Emissions is more than often a material topic. I think it is contradictory to only achieve Good Practice in 20.3 when we would achieve Leading Practice in 1.2 for basically doing the same independent assurance. Doing such independent assurance should be Leading Practice for both 1.2 and 20.3

1.3 Transparency of Mineral Revenues Leading Practice 5

18.3 Water Reporting Leading Practice 2

Performance Area 22: Pollution Prevention

SECTION: Glossary and Interpretive Guidance

COMMENT:

The "Sensitive receptors" definition is open to interpretation. We suggest being clearer with the definition.

Performance Area 23: Circular Economy

SECTION: 23.1 Circular Economy for all Facilities, Good Practice, 1

COMMENT:

What about mention of labour rights, human rights in scrap supply chain?

SECTION: 23.1 Circular Economy for all Facilities, Towards Good Practice, 1

COMMENT:

We believe this is ambitious for Towards Good Practice level. It should be moved to Good Practice or Leading Practice.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 7

COMMENT:

We suggest stressing that defined intervals could also be different intervals because of the different knowledge bases (env, social, cultural and economic). It does not seem practical to have that defined in a documents for each type of knowledge base. Could it be “on a continuous basis”?

SECTION: 24.1 Closure Management, Towards Good Practice, 2

COMMENT:

In regard to developing a closure plan consistent with “regulatory requirements”, we suggest revising the language to address and provide clarity on the following:

- 1. How should technical considerations be integrated?*
 - 2. What about jurisdictions where requirements are non-existent or very lax?*
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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: 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: 4: Exceeds 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: 4: Exceeds 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