

CMSI Consultation Response

Respondent Details

NAME

Anonymous

COUNTRY

Australia

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: 3: Meets 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: 2: Below expectations

Refer to comments on the Claims Policy

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

QUESTION 1

Does the scope, content, and narrative style of the consolidated standard meet your individual expectations for responsible production practices?

Response: No 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: No 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

General Comment

COMMENT:

1. Rigid Timeline for Gap Closure

Issue: The requirement to close all gaps within one assurance cycle (three years) does not reflect operational realities. Complex actions, such as negotiating community agreements, conducting impact assessments, or implementing GHG-related capital projects, often require multi-year planning and execution. This rigidity risks penalizing facilities for circumstances beyond their control and discourages adoption.

Suggestion: More flexibility / phased approach.

2. 100% Gap Closure Requirement

Issue: Requiring Good Practice across all Performance Areas to maintain the performance claim is overly rigid and unrealistic. It assumes a "perfect score," which conflicts with the principle of continuous improvement and creates a barrier for facilities that are progressing but not yet fully compliant.

Suggestion: Alternative threshold (e.g., $\geq 90\%$) or progress-based approach.

3. Lack of Tiered Recognition

Issue: The current policy offers only one Performance Claim, which removes incentives for incremental improvement after the first cycle. Without a "ladder of claims" or tiered recognition facilities have no motivation to advance beyond the minimum threshold.

Suggestion: Tiered claims structure similar to IRMA; introduction of intermediate performance levels.

4. Claims Policy does not cover the impacts of Extensions or Corrective Action Plans

Issue: Although the assurance process allows for a medium-term corrective action plan (12 months), the claims policy does not clarify how corrective action windows and assurance extensions impact claim maintenance.

Extensions: Facilities need flexibility for disruptions such as industrial action, curtailments, or major operational changes. Without provisions for audit extensions or temporary relief, facilities may be penalized for factors outside their control. (e.g., industrial action, curtailments).

Corrective Actions: The Claims Policy (p.8) currently states: "To maintain the Performance Claim, the Facility must close any gaps to achieve Good Practice Level in all applicable Performance Areas within one assurance cycle."

Suggestion: Explicit allowance for extension of the Performance Claim in the Claims Policy that applies during the corrective action window and during approved assurance extensions.

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: **1: Significantly below**

As per general comments provided in the Claims Policy document below:

1. Rigid Timeline for Gap Closure

Issue: The requirement to close all gaps within one assurance cycle (three years) does not reflect operational realities. Complex actions, such as negotiating community agreements, conducting impact assessments, or implementing GHG-related capital projects, often require multi-year planning and execution. This rigidity risks penalizing facilities for circumstances beyond their control and discourages adoption.

Suggestion: More flexibility / phased approach.

2. 100

Issue: Requiring Good Practice across all Performance Areas to maintain the performance claim is overly rigid and unrealistic. It assumes a “perfect score,” which conflicts with the principle of continuous improvement and creates a barrier for facilities that are progressing but not yet fully compliant.

Suggestion: Alternative threshold (e.g., ≥ 90)

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Suggestion: Tiered claims structure similar to IRMA; introduction of intermediate performance levels.

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