

CMSI Consultation Response

Respondent Details

NAME

Christian puebla

COUNTRY

Chile

PERMISSION

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

STAKEHOLDER

Consultancy

ORGANISATION

Mincore

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

muy buena iniciativa

Document:
Assurance

2. Roles and Responsibilities

SECTION: A. Facilities and their Parent Companies

COMMENT:

incluir puertos y ferrocarriles. Hay mineras que poseen ambas instalaciones.

TRANSLATION:

Include ports and railways. Some mining companies have both facilities.

COMMENT:

como canales de informacion se podria enviar un TdR (Terminos de Referencia)

TRANSLATION:

As channels of information, could you send a ToR (Terms of Reference)?

SECTION: B. Assurance Providers

COMMENT:

¿que sucede con las empresas auditoras big four que ademas de ser proveedores de aseguramiento, prestan servicios adicionales de auditoria a las mineras?

En chile hay restriccion al respecto.

TRANSLATION:

What about the Big Four auditing firms that, in addition to being assurance providers, provide additional auditing services to mining companies?

In Chile there are restrictions on this.

SECTION: C. The Secretariat

COMMENT:

Respecto del due diligence ¿se indicarán las fuentes donde efectuar las validaciones? en caso de mineras que esten en proceso sancionatorio medio ambientales que incluya remediar mediante un programa de cumplimiento ¿como se deberia considerar?

TRANSLATION:

With regard to due diligence, will it indicate the sources where validations are to be carried out? In the case of mining companies that are undergoing environmental sanctions including remediation through a compliance program, how should this be considered?

COMMENT:

¿que significa paneles nacionales?

TRANSLATION:

What does "national panels" mean?

3. Who Can Conduct External Assurance?

SECTION: 3.1 Assurance Provider Requirements, 3.1.1 Assurance Provider Qualifications

COMMENT:

Los profesionales que realicen actividades aseguramiento deberían poseer experiencia comprobada de a lo menos 10 años en la industria minera, además de un titulo relacionado. En algunas instituciones solicitan documentos verificables como certificados emitidos por mineras, con logo, nombre y cargo de firma responsable. Además de los titulos profesionales pertinentes.

TRANSLATION:

Professionals engaged in assurance activities should have at least 10 years of proven experience in the mining industry, in addition to a relevant degree. Some institutions request verifiable documents such as certificates

issued by mining companies, with the logo, name, and position of the signer. This is in addition to the relevant professional qualifications.

SECTION: General Comment

COMMENT:

Redefinir paneles nacionales. No se entiende el concepto.

TRANSLATION:

Redefine national panels. We don't understand this concept.

4. Consolidated Standard External Assurance Process

SECTION: 4.1 Methodology

COMMENT:

Hay profesionales que tenemos titulo universitario de auditor con una duracion de 5 años de estudios y con validez legal en el pais. Esto deberia ser considerado en la norma, un titulo relacionado con la actividad de proveedor de aseguramiento.

TRANSLATION:

There are professionals who have a university degree in auditing with 5 years of study which are legally valid in the country. This should be considered in the standard: a degree related to the activity of an assurance provider.

SECTION: 4.2 Planning, 4.2.10 Site Visits

COMMENT:

Es importante, en caso de mineras por sobre los 3.000 msnm que tengan compatibilidad en salud y exámenes de altura geografica vigentes.

TRANSLATION:

It is important that miners working over 3,000 meters above sea level have valid health certificates and altitude tests.

SECTION: 4.2 Planning, 4.2.4 Self

COMMENT:

Dentro del proceso de autoevaluación deberian separar lo siguiente:

Depositos de minerales

Acopio de esteril

Tranques de relaves

Estos temas son importantes para efectos de la estabilidad fisica y quimica bajo condiciones climaticas extremas en el sector minero.

TRANSLATION:

As part of the self-assessment process, the following should be separated:

Mineral deposits

Sterile stockpiles

Tailings reservoirs

These issues are important for physical and chemical stability under extreme weather conditions in the mining sector.

SECTION: 4.2 Planning, 4.2.8 Determining Methodology and Risk

COMMENT:

Es importante considerar una lectura de los compromisos ambientales aprobados por la autoridad (permisos y compromisos), para así identificar los riesgos y evaluar su cumplimiento

TRANSLATION:

It is important to take into account the environmental commitments approved by the authorities (permits and commitments) in order to identify risks and assess compliance.

SECTION: 4.3 Execution of Facility Assessment, 4.3.3 Interviews

COMMENT:

En caso de ser imposible, se sugiere documentarlo con la firma del encargado y responsable de la minera.

TRANSLATION:

If this is not possible, we suggest documenting it with the signature of the responsible party at the mining company.

COMMENT:

En caso de recibir una denuncia de un entrevistado, el evaluador debería informar o sugerir que se haga una denuncia responsable por los canales de denuncia de la empresa y dejar constancia de su tratamiento y/o resolución.

TRANSLATION:

If a complaint is received from an interviewee, the evaluator should report it or suggest that an official complaint be made through the company's complaint channels and that a record be kept of its handling and/or resolution.

Appendices

SECTION: A. List of Recognised Auditor Training Credentials

COMMENT:

Si bien las credenciales son importantes, en países como Chile, título universitario en materias de ambientales o de auditoría tiene validez y responsabilidades legales por los juicios profesionales que se emiten. Deberían incluirse las universidades con títulos en materias relacionadas.

TRANSLATION:

Although credentials are important, in countries such as Chile, a university degree in environmental topics or auditing is valid and carries legal responsibilities due to the professional rulings they issue. Universities with degrees in related subjects should be included.

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 03: Responsible Supply Chains

COMMENT:

Las compañías mineras están implementando y exigiendo estándares ESG a proveedores críticos para efectos de la prestación de servicios o suministros, que sean parte de la cadena de suministro responsable.

TRANSLATION:

Mining companies are implementing and requiring ESG standards from critical suppliers to provide services or supplies, as part of the responsible supply chain.

Performance Area 20: Climate Action

SECTION: 20.2. Climate Change Management (Facility Level), Towards Good Practice, 0

COMMENT:

Se debe incluir la evaluación del impacto del cambio climático en las instalaciones, bajo estándar IFRS S1 S2 en SASB. Este informe es obligatorio y debe ser público para efectos de obtener financiamiento de proyectos de transición y medidas de mitigación climáticas.

TRANSLATION:

The assessment of climate change impact on facilities should be included under IFRS S1 S2 in SASB. This report is mandatory and must be made public in order to get financing for transition projects and climate mitigation measures.

Performance Area 21: Tailings Management

SECTION: Applicability

COMMENT:

Incluir una sección nueva para Acopios de Esteril (distintos de relaves) que deben cumplir requisitos de estabilidad física - química específicamente ante eventos climáticos extremos que deben ser monitoreados ante la autoridad.

TRANSLATION:

Include a new section for sterile stockpiles (separate from tailings) that must meet physical and chemical stability requirements, specifically in the event of extreme weather events that need to be monitored by the authorities.

Performance Area 24: Closure

SECTION: 24.1 Closure Management, Good Practice, 0

COMMENT:

incluir un plan de difusion a las comunidades y stakeholders sobre el avance y alcance del plan de cierre.

TRANSLATION:

Include a plan to inform communities and stakeholders about the progress and scope of the closure plan.

SECTION: Applicability

COMMENT:

En Chile, el plan de cierre solo puede ser realizado por un profesional autorizado y con experiencia minera por sobre 10 años, conforme lo exige la ley. En este caso, recomiendo que el verificador valide la existencia de un plan actualizado y verifique el cumplimiento de los tiempos de implementación. Proponer algo distinto requiere desarrollar ingeniería de detalles complejas.

Si el evaluador recomienda algo diferente requiere autorización de la Autoridad, donde se debe presentar una justificación técnica, ambiental y económica para que sea autorizada por la autoridad fiscalizadora en los tiempos y plazos que indica la ley.

TRANSLATION:

In Chile, the closure plan can only be carried out by an authorized professional with over 10 years of mining experience, as required by law. In this case, I recommend that the verifier validate the existence of an updated plan and verify compliance with implementation timelines. Proposing something different requires engineering of complex details.

If the evaluator recommends something different, authorization from the Authority is required, and a technical, environmental, and economic justification must be submitted for approval by the supervisory authority within the time frames and deadlines indicated by law.

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: 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

requiere mejoras en cuanto al impacto del cambio climático en las faenas mineras

Improvements needed to climate change impact at mining sites

Disclaimer

COMMENT:

Recomiendo incorporar empresas relacionadas con minería no metálica (litio, yodo, nitratos) que son relevantes para la industria tecnológica mundial.

TRANSLATION:

I recommend adding companies related to non-metallic mining (lithium, iodine, nitrates) which are relevant in the global technology industry.

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