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Final Consultation Summary Report

Consolidated Mining Standard Initiative

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
APELL	Awareness and Preparedness for Emergencies at the Local Level
ASM	artisanal and small-scale mining
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CMSI	Consolidated Mining Standard Initiative; the Initiative
CRPD	Convention on the Rights of Persons with Disabilities
CSO	civil society organisation
CSRD	Corporate Sustainability Reporting Directive
DEI	diversity, equity, and inclusion
EHS	Environment, Health and Safety
EITI	Extractive Industries Transparency Initiative
ERM	Environmental Resources Management, Inc.
ESIA	Environmental and Social Impact Assessment
ESRS	European Sustainability Reporting Standards
FPIC	free, prior, and informed consent
GHG	greenhouse gas
GISTM	Global Industry Standard on Tailings Management
GRI	Global Reporting Initiative
GTMI	Global Tailings Management Institute
HRDD	Human Rights Due Diligence
ICC	International Code of Conduct
ICERD	International Convention on the Elimination of All Forms of Racial Discrimination
ICMM	International Council on Mining and Metals
IFC PS	International Finance Corporation Performance Standards
IFRS	International Financial Reporting Standards
IGO	intergovernmental organisations
ILO	International Labour Organization
ISEAL Code	ISEAL Code of Good Practice for Sustainability Systems
ISO	International Organization for Standardization
IWRM	Integrated Water Resources Management
NGO	nongovernmental organisation
NGO/CSO	nongovernmental organisation / civil society organisation
OECD	Organisation for Economic Co-operation and Development
OHCHR	Office of the United Nations High Commissioner for Human Rights
OUV	Outstanding Universal Value

Acronym	Description
SIF	serious incidents and fatalities
Standard	Consolidated Mining Standard
TCFD	Task Force on Climate-related Financial Disclosures
TSM	Towards Sustainable Mining
UNEP	United Nations Environment Programme
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNGP	United Nations Guiding Principles
VPSHR	Voluntary Principles on Security and Human Rights

EXECUTIVE SUMMARY

The Consolidated Mining Standard Initiative (CMSI) is a joint effort between the Copper Mark, International Council on Mining and Metals (ICMM), the Mining Association of Canada (MAC), and World Gold Council (WGC) to consolidate their individual responsible mining standards into one global Standard and oversight system.

CMSI underwent two rounds of public consultation guided by the ISEAL Code of Good Practice for Sustainability Systems (the ISEAL Code) to help support and achieve CMSI reduce the complexity of the current standards landscape, meet the needs of a wide range of stakeholders, and drive improved performance on responsible mining at scale.

CMSI retained Environmental Resources Management, Inc. (ERM) to develop an online portal to support the public consultation process and analyse feedback received. Following the first round of public consultation in 2024, the partners published a Consultation Report developed by ERM and copies of individual submissions on the CMSI website in early 2025.

This report analyses feedback received during the second and final public consultation that took place between 8 October and 17 November 2025.

CONSULTATION PROCESS

CMSI held a second and final public consultation period from 8 October to 17 November 2025 on updated drafts of the Consolidated Mining Standard Assurance Process and Claims Policy documents. The Governance Model was not included in the final consultation. ERM redeveloped the online portal used in the first public consultation to provide an accessible platform to stakeholders for submitting feedback on the draft documents, including qualitative and quantitative feedback.

Through the portal design, the consultation process enabled stakeholders to provide general comments on each document; comments on specific Performance Areas, Sections, Performance Levels, and/or Requirements; responses to prepared questions on whether each document met various expectations; or upload a document containing feedback. Submissions received via email were also accepted and uploaded to the portal. After the closure of the first comment period, ERM categorised and analysed submissions to enable reporting on the feedback submitted.

CMSI conducted stakeholder outreach supported by a communications strategy aimed at raising awareness of the public consultation. The consultation press release received more than 236,900 views, with the initiative mentioned in global media at least 1,292 times. Direct stakeholder outreach included 4 virtual public webinars, more than 20 direct briefings with stakeholders and rights-holders, and 16 in-person engagements at public events in 8 countries. For more details, see Section 3.2, Stakeholder and Rights-Holder Outreach and Engagement.

STAKEHOLDER RESPONSE DATA

During the final public consultation, CMSI received feedback from 120 respondents[1] from 29 countries. Four of these respondents submitted feedback signed by 101 individuals or organisations as signatories representing multi-country or multi-jurisdictional organisations, including from nongovernmental organisations (NGOs) and Indigenous organisations. The countries with the most respondents include Canada (14) and the United States (14) followed by Australia (11), Chile (9), South Africa (9), and the United Kingdom (9). Feedback was submitted in three languages: English, Spanish, and Portuguese.

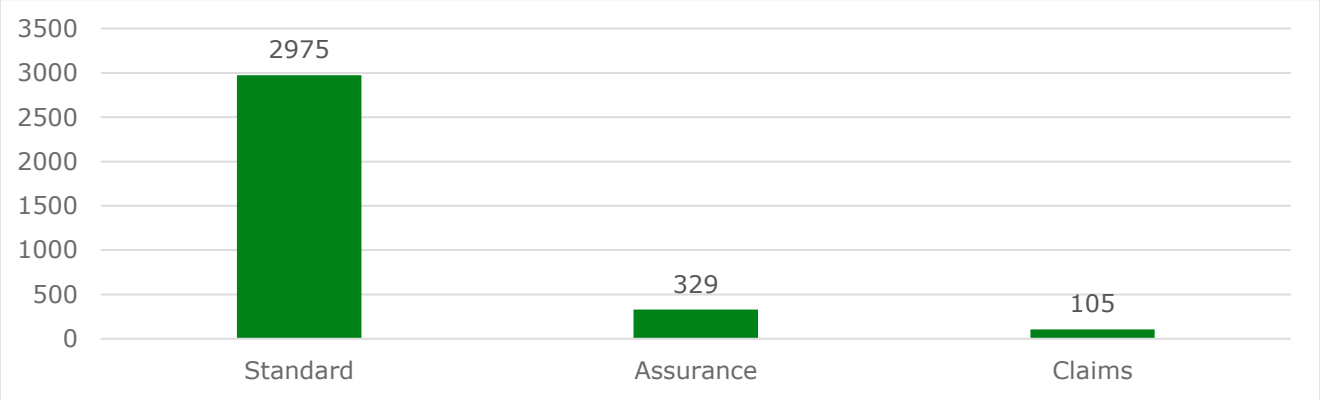
120 stakeholders responded during the second and final public consultation process during the 40-day consultation period in 2025. 110 stakeholders submitted 3,409 comments and 102 stakeholders submitted responses to the general question survey.

Comments were received on the three draft documents (see Figure 1). The top four stakeholders by number of comments submitted include Upstream Mining Industry stakeholders at 28 percent of all comments on the draft documents, followed by Midstream industry stakeholders at 17 percent of comments, Consultancy stakeholders at 14 percent of comments, and nongovernmental organisation / civil society organisation (NGO/CSO) stakeholders at 9 percent.

Performance Areas that received the most comments from all stakeholder types included the following:

- Performance Area 14: Indigenous Peoples (221 comments);
- Performance Area 1: Corporate Requirements (191 comments); and
- Performance Area 7: Rights of Workers (162 comments).

FIGURE ES-1 NUMBER OF COMMENTS BY DOCUMENT



[1] Respondents are defined as an individual, organisation, or group of individuals or organisations submitting a series of comments or document(s) during the consultation period. Submissions representing multiple signatories or organisations are counted as one Respondent for clarity in reporting stakeholder types and country representation.

RESPONSE TO GENERAL QUESTIONS

Quantitative feedback was based on seven overarching questions designed to help understand the respondents' overall reception of the three draft documents. A majority of respondents indicated that the draft documents meet, exceed, or significantly exceed expectations.

CMSI incorporated seven general questions on how well aspects of the draft documents aligned with stakeholder expectations to support a clearer quantitative analysis of respondents' overall reception of the draft documents. Responses were provided by 102 respondents across these seven general questions.

For all questions, most respondents indicated that the proposed documents meet, exceed, or significantly exceed expectations. Supplier/ Business Partners and Assurance Provider /Auditors had a notably high *meets, exceeds,* or *significantly exceeds expectations* response rate for a majority of questions, with 100 percent respondents responding that the following *meets, exceeds,* or *significantly exceeds expectations*: improvement over the original Standard; ability of the Standard to Improve Performance, Assurance Process approach; and ability of the Claims Policy to drive performance improvement. NGO/CSO respondents had the highest rate of *did not meet expectations* responses for all questions.

The table below (Table ES-1) details the percentage of all respondents who indicated that the content met, exceeded, or significantly exceeded expectations versus indication that the content did not meet expectations.

TABLE ES-0-1 SUMMARY OF GENERAL QUESTION RESPONSES FOR ALL STAKEHOLDER TYPES

	*	% All Respondents
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?**	+	**74**
	-	26
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?**	+	**66**
	-	34
Do the **requirements meet your expectations for being sufficiently clear** to support consistent and practical implementation and to achieve necessary performance improvement?	+	**61**
	-	39
Does the **scope, content, and narrative style** of the consolidated standard meet your individual expectations for responsible production practices?	+	**74**
	-	26
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?	+	**70**
	-	30
From your perspective, does the Assurance Process meet your expectations of a robust, credible, replicable, and transparent approach?	+	70
	-	30

	*	% All Respondents
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?	+	74
	-	26

Notes:
* '+' indicates combined *meets expectations, exceeds expectations*, and *significantly exceeds expectations* responses and '-' indicates combined *below expectations* and *significantly below expectations* responses.
** The updated Governance Model was not part of the final public consultation.

Five of the seven questions included in the Final Public Consultation were also included in the First Public Consultation. For all five questions, the rate of *meets, exceeds,* or *significantly exceeds expectations* responses stayed the same or increased, as illustrated by the table below (Table ES-2).

TABLE ES-0-2 CHANGE IN RESPONSE RATES BETWEEN FIRST AND FINAL CONSULTATION FOR APPLICABLE QUESTIONS

	*	% All Respondents First Consultation	% All Respondents Second and Final Consultation	% Change
Ability of the CMSI to Improve Performance	+	**63**	**66**	**+3**
	-	37	34	
Clarity and Applicability of Requirements	+	**56**	**61**	**+5**
	-	44	39	
Scope, Content, and Narrative of Standard	+	**67**	**74**	**+7**
	-	33	26	
Three-Level Performance Structure	+	**66**	**70**	**+4**
	-	34	30	
Assurance Process Approach	+	**70**	**70**	**0**
	-	30	30	

Notes:
CMSI = Consolidated Mining Standard Initiative
* '+' indicates combined *meets expectations, exceeds expectations*, and *significantly exceeds expectations* responses and '-' indicates combined *below expectations* and *significantly below expectations* responses.

FEEDBACK OVERVIEW

Improvements over First Consultation Documents

Through overarching feedback and responses to the general questions, respondents note that the current drafts have improved in clarity, structure, and consistency, showing improved alignment with requirements and with other international standards or best practices. Respondents note opportunities to continue to drive performance and clarify certain phrases or details related to technical subject matter details within Performance Areas.

Need for Further Implementation Guidance and Consistency Across Performance Areas

Respondents have identified challenges in interpreting and assuring certain requirements due to undefined language, such as 'meaningful engagement', 'where feasible', and 'where appropriate'. Comments request clearer minimum expectations, indicators, and guidance to support consistent implementation and auditability. In contrast, some respondents requested phrasing such as 'where feasible' or 'where appropriate' to support differences in applicability.

Stakeholders also identified opportunities to improve consistency across Performance Areas, particularly for cross-cutting topics such as grievance mechanisms and public disclosures. They recommend clearer alignment of terminology, and where relevant, mapping of overlapping requirements.

Across Performance Areas, feedback often focuses on clarifying definitions and phrasing to support clear implementation and auditability.

Further Clarity on Claims Details

Stakeholders suggest that further distinction is needed between claims, and that further incentives are needed for achieving Leading Practice. Introducing more flexibility to the achievement thresholds, such as allowing a facility that meets at least 80 percent of the Leading Practice requirements to be recognised as Leading Practice may be a more appropriate standard for achievement. Additionally, stakeholders request flexibility around time-bound corrective actions while protecting certain red-line areas such as human rights and free, prior, and informed consent (FPIC).

Consistency Between Practice Levels

While respondents acknowledge improvements in consistency across Practice Levels, they continue to call for clearer differentiation and progression of practices between levels. Respondents raise concerns that some requirements at the Towards Good Practice Level may be insufficiently robust, or that applicability criteria may hinder progression to Leading Practice where facilities or companies may not be able to achieve requirements that are not directly applicable.

Incentives for Driving Performance Improvement

Comments from investors and NGO/CSO stakeholders note that there is a lack of incentive for facilities to progress to the Leading Practice level, which affects the Standard's overall ability to drive performance improvement at scale and improve outcomes for communities and workers. Industry stakeholders also noted concerns about lack of incentives, with some requesting a leading practice claim.

Disclosures, Equivalency, and Applicability

Industry respondents raise concerns about the scope and volume of facility-level public disclosures and request clearer articulation of their purpose and relevance. Conversely, assurance providers and NGO/CSO stakeholders generally support public disclosure requirements to promote transparency.

Respondents across stakeholder types emphasise the importance of clearer equivalency mapping with international standards and frameworks to reduce duplication and support alignment. For example, midstream and downstream industry, investors, and NGO/CSO

stakeholders suggest applying International Finance Corporation Performance Standards (IFC PS) to promote consistency and stronger safeguards in Performance Area 4, New Projects, Expansions and Resettlement, and Performance Area 15, Cultural Heritage.

Respondents request additional clarity on the scope and applicability of the standard to different facility types, including exporters, traders, smelters, and refineries, noting that some requirements are difficult to interpret or implement in the absence of mining activities.

Regional and Country-Specific Considerations

Respondents emphasise the need for clearer guidance or practical examples to support implementation across different regulatory, social, and operating contexts. They raise specific concerns about facilities operating in Africa, Scandinavia, and South America. Respondents note that terminology and expectations may vary by jurisdiction and recommend that the Standard provide context-sensitive interpretive guidance aligned with national laws, governance structures, and social organisations.

Complexity of Standard and Recommendations for Phased, Materiality, or Risk-Based Approach

Respondents raise concerns that the overall complexity and prescriptiveness of the Standard may be onerous for some facilities, particularly small and medium-sized enterprises operating in developing economies. They note that implementation, assurance, and timeline requirements could place significant burdens on operators and potentially limit adoption.

Respondents suggest alternative implementation approaches to improve feasibility and uptake. These include phased implementation based on site-level risk, as well as materiality-based approaches that would enable facilities to prioritise resources towards the most significant impacts and risks.

Concern for Costs and Complexity of Assurance

Respondents raise concerns about the cost, complexity, and administrative burden associated with assurance, including the requirement for independent assessments and a potentially limited pool of approved assurance providers. They highlight the risk of audit fatigue, particularly with the additional requirement of annual self-assessment and disclosure, and question whether this approach would proportionately improve assurance quality. Further information is requested on the role of national panels.

Respondents suggest recognising equivalencies with other standards and exploring tiered pricing or proportional approaches based on facility size or revenue.

Transparency and Oversight of Assurance

Some feedback expresses concern about the transparency and oversight of assurance, noting a reliance on self-reporting and a perception that mining companies may have too much control over the auditing process. NGO/CSO stakeholders in particular note that further detail is needed to appropriately assess how companies or facilities met or did not meet Requirements, whether specific Requirements were or were not applicable, and how corrective actions identified by assurance providers will be made public.

Indigenous Peoples and Communities and Free, Prior, and Informed Consent

Performance Area 14, Indigenous Peoples, received the highest number of comments of all Performance Areas in the Standard. Feedback from Indigenous Peoples and communities and NGO/CSO stakeholders note concerns in Performance Area 14 and other relevant Performance Areas about FPIC, requesting specific changes to how FPIC is described and where additional references to FPIC are needed.

Other comments focus on working definitions of Indigenous Peoples, equivalency to other standards focusing on Indigenous Peoples, and improvements to requirements related to Indigenous Peoples based on the first consultation.

CONCLUSION

Overall, stakeholders recognise progress in the revised Consolidated Standard system and continue to support CMSI's objective of consolidating Partner organisations' responsible mining expectations into a single global framework. Quantitative feedback indicates improved perceptions of the revised documents, particularly in relation to clarity, structure, and transparency.

Respondents highlight the need to further refine the Standard to ensure it is practical and accessible across diverse operating contexts. Feedback focuses on the complexity and detail of requirements, potential burdens associated with implementation and assurance, and the need for clearer guidance to support consistent interpretation and auditability.

1. INTRODUCTION

The Consolidated Mining Standard Initiative (CMSI) is a joint effort between the Copper Mark, International Council on Mining and Metals (ICMM), the Mining Association of Canada (MAC), and World Gold Council to consolidate their individual responsible mining standards into one global Standard and oversight system. The CMSI aims to reduce complexity and clarify 'responsible practices for mining companies of all sizes, across all locations and commodities'.

CMSI underwent two rounds of public consultation guided by the ISEAL Code of Good Practice for Sustainability Systems (the ISEAL Code) to help support and achieve CMSI reduce the complexity of the current standards landscape, meet the needs of a wide range of stakeholders, and drive improved performance on responsible mining at scale.

CMSI retained Environmental Resources Management, Inc. (ERM) to develop an online portal to support the public consultation process and analyse feedback received. The first round of public consultation took place between 16 October and 16 December 2024. The partners published a Consultation Report developed by ERM and copies of individual submissions on the CMSI website in early 2025.

This report analyses feedback received during the second and final public consultation that took place between 8 October and 17 November 2025.

2. METHODOLOGY

To support the second and final public consultation, ERM configured the online consultation portal used during the first public consultation and assisted with the development of a registration survey and a quantitative questionnaire. To prepare for CMSI's consideration and potential integration into the draft documents, ERM reviewed and categorised all submitted comments, identifying general and overarching feedback, compiling detailed comments and related trends, as well as facilitating public disclosure of the comments submitted. ERM also reviewed comments for accuracy with respect to the referenced CMSI draft documents, adding, as appropriate, content-related categorisation to assist CMSI's further analysis and incorporation of feedback. More details on content-related categorisation are provided in Section 3.3, Categorisation and Analysis.

Comments that were submitted in languages other than English were translated into English by a third-party translation service. Feedback submitted as an uploaded document was assessed and categorised as singular or multiple comments depending on the nature of the feedback (e.g., comments referring to one section versus multiple sections of a document). Comments submitted through the portal clearly indicating feedback on multiple, separate sections of a document were divided into multiple comments, as needed, for clarity in the categorisation process.

For reporting purposes, a respondent is defined as an individual, group of individuals, organization, or group of organisations that submitted comments and responses to survey questions through the consultation portal or uploaded a document of feedback under a single email and/or user identification number; therefore, groups of individuals and/or organisations that submitted letters or compiled feedback with multiple signatories are counted as a single respondent in this analysis.

3. FINAL CONSULTATION PROCESS

CMSI held a second and final public consultation period from 8 October to 17 November 2025, on updated drafts of the Standard, Assurance Process, and Claims Policy documents. The Governance Model was not included in the final consultation. ERM redeveloped the online portal used in the first public consultation to provide an accessible platform to stakeholders for submitting feedback on the draft documents, including qualitative and quantitative feedback.

Through the portal design, the consultation process enabled stakeholders to provide general comments on each document; comments on specific Performance Areas, Sections, Performance Levels and/or Requirements; responses to prepared questions on whether each document met various expectations; or upload a document containing feedback. Submissions received via email were also accepted and uploaded to the portal. After the closure of the first comment period, ERM categorised and analysed submissions to enable reporting on the feedback submitted.

In addition to the feedback received through the consultation portal and via email, one submission was received through feedback collected during an in-person meeting. After this meeting, minutes were shared with participants and, with their consent, the minutes were submitted to the consultation portal system

3.1 CONSULTATION PORTAL

The consultation portal website prompted stakeholders to choose their preferred language and create an account, which enabled the opportunity to save feedback, return to review, add additional comments, and submit feedback at a later time. Once registered, users could visit their Profile to review and edit certain account information.

The draft documents and several options for providing feedback were hosted on a central table on the portal. For each CMSI draft document, stakeholders had the option to provide 'Specific Feedback', answer 'General Questions', or download a PDF copy of the document to review it off-line. To provide specific feedback, stakeholders clicked 'View/Edit' to open the document of choice. The left side of the screen displayed the 'Table of Contents' for navigation through the document. The right side of the screen provided users with the option to leave a 'General Comment'. Users could also provide specific comments tagged to a specific subsection of the document, such as a Performance Area. Users could view and manage their comments on an open document on the right side of the screen at any time.

Stakeholders could choose to answer general questions prepared by CMSI for each document. Selecting 'View/Edit' under 'General Questions' led stakeholders through a series of prompts, including a scaled response and open text-box responses. The portal also provided the option for stakeholders to bypass or supplement section-by-section comments by uploading a feedback document. After completing and reviewing their feedback and responses, stakeholders clicked a submission button under the central table.

Respondents selected their stakeholder type during portal registration. For the purposes of the analysis and this report, respondents who selected 'Other' as their stakeholder type have been categorised into the closest related stakeholder type. All original stakeholder type data has been preserved.

3.2 STAKEHOLDER AND RIGHTS-HOLDER OUTREACH AND ENGAGEMENT

Disclaimer: Section 3.2 of this report was drafted by the CMSI team.

The CMSI Partners undertook outreach and engagement prior to and during the second and final public consultation to encourage broad and diverse participation, as well as to ensure accessibility in the public consultation process. In light of the shorter consultation period, there was some reduction in the number of engagements undertaken compared to the first public consultation. To account for the shorter time window, a concentrated effort was made for targeted outreach to ensure key stakeholder groups were reached during the final consultation.

Principles and high-level overview of the CMSI public consultation engagement plan:

Inclusive. *To be achieved through targeted outreach to stakeholder and rights-holder groups. In addition, the three documents for public review were made available in all United Nations languages (i.e., Arabic, Chinese, English, French, Russian, and Spanish, in addition to Brazilian, Portuguese, and Japanese). While the primary channel to share feedback was an online platform, consultees had the option to 'upload their own file on the system'. Additionally, submissions made via email were also accepted.*

Broad reach (proactive)*. To be achieved through a communications campaign and complementary public and explanatory webinars, conducted in addition to targeted outreach.*

Transparency. *Guided by ISEAL's Code of Good Practice for Sustainability Systems, after the consultation ended, the CMSI Partners committed to publishing a consultation report explaining the consultation process through sharing key themes and insights from the feedback (this report). In addition, and for full transparency, the Partners committed to make all verbatim submissions publicly available with respondents' consent.*

Specific. *Blend of qualitative and quantitative data, including basic demographic data to make sure all voices are heard and understood. The online platform allowed specific comments (line-by-line), in addition to general comments and quantitative questions (e.g., 'In your view, does the scope, content, and narrative style of the Consolidated Standard meet your expectations for responsible production practices?' with a response choice using a defined scale from 1 to 5)*

The CMSI public consultation engagement was guided by a stakeholder engagement plan and followed the same principles as the first public consultation: inclusive, broad reach (proactive), transparent, and specific. In addition, the plan included targeted outreach to stakeholder groups and geographies from whom CMSI received fewer submissions in the first public consultation, including stakeholders in the Global South.

The plan was executed with the following results:

- The Partners hosted four virtual open public webinars delivered in English, French, and Spanish to an audience of close to 300 people. These sessions enabled participants to hear an overview of the documents and pose questions to Partners. Recordings of the first two sessions were published on the CMSI website: here. The Partners conducted 20 direct virtual briefings addressed to a wide range of stakeholders and rights-holders, including civil society organisations (CSOs), government representatives and policymakers, investors, mining associations, and assurance providers. This was in addition to numerous on-demand and bilateral engagements. Through these briefings, the Partners reached more than 750 individuals.
- The Partners offered four virtual webinars to Indigenous Peoples and Indigenous Peoples organisations where the Partners presented the major changes from the first consultation Standard draft on the Performance Area, Indigenous Peoples.
- Sixteen in-person engagements at public events were undertaken in eight different countries across four continents, reflecting the global nature of the initiative. This included public panels, roundtables, and proactive participation at international events such as Perumin Convención Minera in Arequipa, Peru; the International Mining and Resources Conference (IMARC) in Sydney, Australia; and the UN Climate Change Conference (i.e., UNFCCC COP30) in Belém, Brazil.

The Partners' outreach and engagement efforts were supported by a communications campaign aimed at raising awareness of the public consultation and encouraging participation. The theme of communications was 'Have your say', where stakeholders were informed of the CMSI and its goals, the outcomes of, and amendments made, during the previous consultation, the importance of participation, and an appeal for input. This campaign disseminated content on CMSI and Partner websites, newsletters, social media channels, and by engaging news media in advance of and throughout the public consultation period. A number of global mining companies and other stakeholders amplified this campaign by promoting the consultation process to their audiences and stakeholders through their websites or social media channels.

The CMSI Partners engaged with news media across the world by issuing press releases, conducting interviews, and responding to queries from journalists. CMSI's consultation launch press release received over 236,900 views, with the Initiative mentioned in the global media at least 1,292 times.

Additionally, the CMSI LinkedIn page was visited extensively during the period with 179,600 impressions during the consultation period. Social media content was targeted to reach a broad range of mining and non-mining stakeholders in mining-affected regions and major producer regions.

The campaign also worked to raise awareness about the Partner's outreach and engagement activities during the consultation period. This included highlighting the ongoing engagements with interested parties and respondents with tailored content as well as replies to comments, emails, and phone calls to foster and facilitate participation in the public consultation process.

3.3 FEEDBACK CATEGORISATION AND ANALYSIS

Comments were reviewed and categorised (or recategorised, as needed) for accuracy to the referenced CMSI draft documents, including the document, Section, Performance Level, and

Requirements, as applicable. To assist in the CMSI's review of submitted feedback, comments were also categorised by the type of comment, content-specific details, feedback related to Performance Level adjustments, and key topics of interest. Categories were vetted with the CMSI prior to their use and are described in the table below (Table 3-1).

TABLE 3-1 COMMENT CATEGORIES AND DEFINITIONS

	Category	Definition
Type of Comment	**Structural or Fundamental**	Related to the overall purpose, structure, intent, or implementation of the CMSI.
	Content-Specific	Related to specific text or subject matter content within the Consolidated Standard, Assurance Process, or Claims Policy.
	Format, Grammar, or Translation	Related to specific formatting, grammatical, translation, or other document errors.
	No Applicable Feedback	Comment does not contain substantial feedback, such as accidental blank entries, as 'No comment', 'I did not review this section', or 'See feedback in other sections'.
Type of Comment Subcategories		
Structural or Fundamental Detailed Content	Purpose or intent of the Initiative	
	CMSI document structure	
	Implementation, practicality, or broader mining industry concerns	
	Stakeholder engagement or feedback processes	
	Governance Model	
	General feedback on the CMSI	
Content-Specific Detailed Content	Definitions	
	Word choice or phrasing	
	Request for clarity or detail	
	Subject matter-specific content	Detailed issue related to technical subject matter such as water, waste, air quality, resettlement, etc.
	Performance Area structure or content	
	Performance Level structure or content	
	Requirement Level structure or content	
	References or methodology	

	Category	Definition
Format, grammar, or translation	Formatting	
	Grammar	
	Translation	
	Other document error	
Optional Categorizations		
Performance Level or Requirement Changes	Change requirement level	
	Remove requirement	
	Combine requirements	
	Add new requirement	
Key Topics	Indigenous Peoples or communities	
	Gender	
	Human rights	
	Practicality	Practicality or impracticality of implementation.
	Auditability	Ability of a Requirement or other element to be audited.
	Responsibility	Roles and responsibilities of organisations or individuals in implementation or meeting requirements.

Note:
CMSI = Consolidated Mining Standard Initiative

4. RESPONDENT ANALYSIS

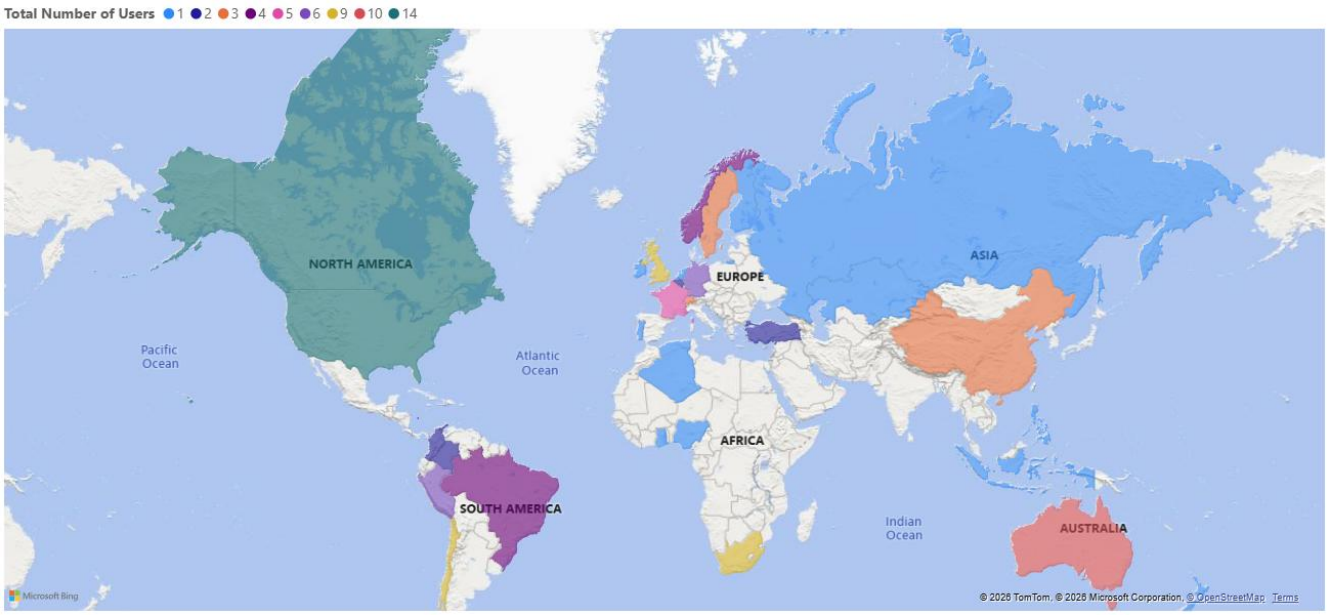
CMSI received feedback from 120 respondents,[2] including four respondents whose submissions were signed by 101 individuals or organisations. Feedback was received from respondents in 29 countries as well as four submissions with stakeholder signatories representing multi-country or multi-jurisdictional organisations, including from NGOs and Indigenous organisations.

Of the 120 respondents, 110 submitted comments and/or uploaded a document containing feedback, and 102 submitted responses to the general questions.

4.1 LOCATIONS AND LANGUAGES

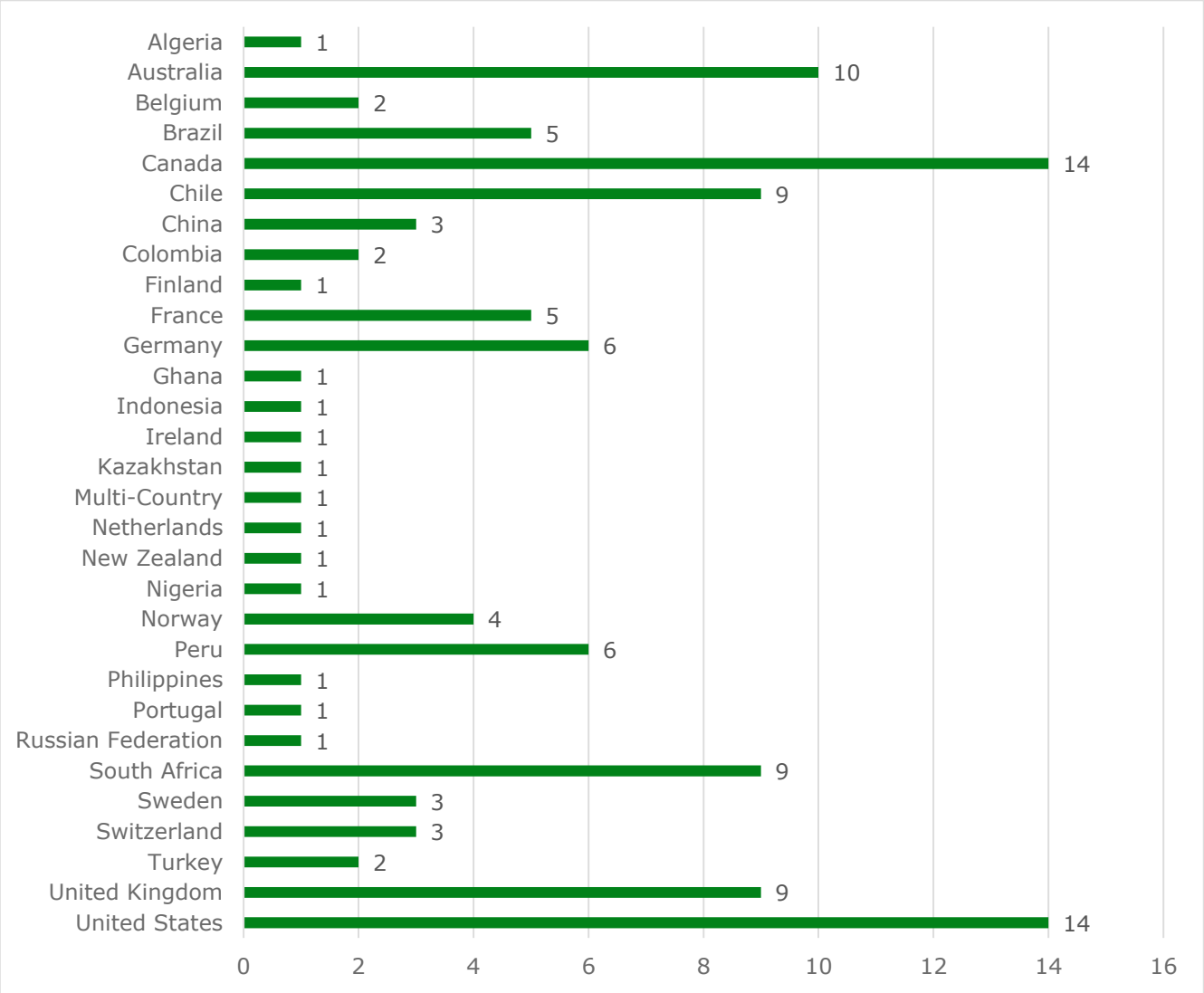
Feedback was received from respondents in 29 countries as well as four submissions with stakeholders representing multi-country or jurisdictional organisations. The countries with the most respondents include Canada (14) and the United States (14) followed by Australia (10), Chile (9), South Africa (9), and the United Kingdom (9). Feedback was submitted in three languages: English, Spanish, and Portuguese.

FIGURE 4-1 WORLD MAP OF 120 RESPONDENTS



[2] Respondents are defined as an individual, organisation, or group of individuals or organisations submitting a series of comments or document(s) during the consultation period. Submissions representing multiple signatories or organisations are counted as one respondent for clarity in reporting stakeholder types and country representation.

FIGURE 4-2 RESPONDENTS BY COUNTRY



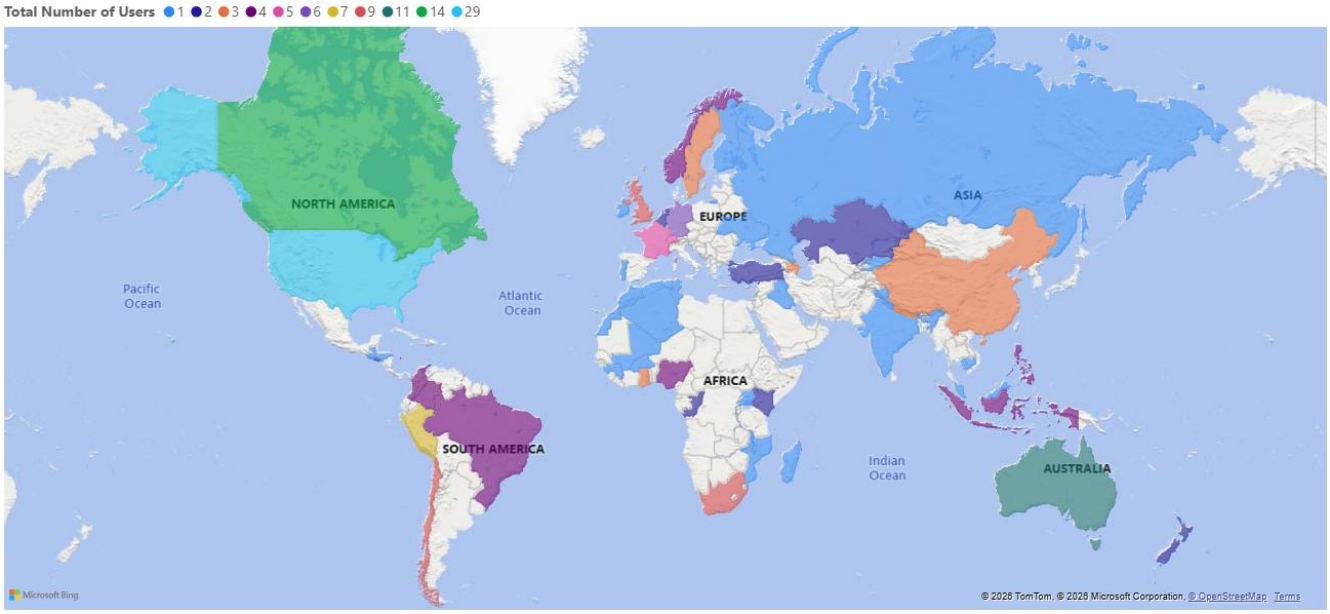
In addition to the 29 countries represented by 120 respondents, signatories to four submissions included 101 named and anonymous individuals and organisations, including those from Indigenous organisations and NGOs. Based on data provided by these organisations, signatories represent a variety of countries and regions as well as global or multi-country organisations. Regions and countries listed by signatories include the following:

- Africa
- América Latina
- Aotearoa—New Zealand/Pacific
- Asia
- Azerbaijan
- Burkina Faso
- Cambodia/Asia
- Guinée
- Honduras
- India/Asia
- Indonesia/Asia
- Iraq
- Kenya
- the Kyrgyz Republic
- Mesoamérica
- Morocco
- Mozambique
- Nepal
- Nigeria
- Papua—Indonesia/Asia
- Putumayo—Mocoa

- El Salvador, Centro America
- Europe
- Global
- Ghana
- Guatemala/ Latin America
- Latin America/ Caribbean
- Madagascar
- Malawi
- Malaysia/Asia
- Mali-Afrique
- Republic of Congo
- Tunisia
- Uganda
- Ukraine

The figure below (Figure 4-3) represents both respondents and signatories who provided a country-specific location.

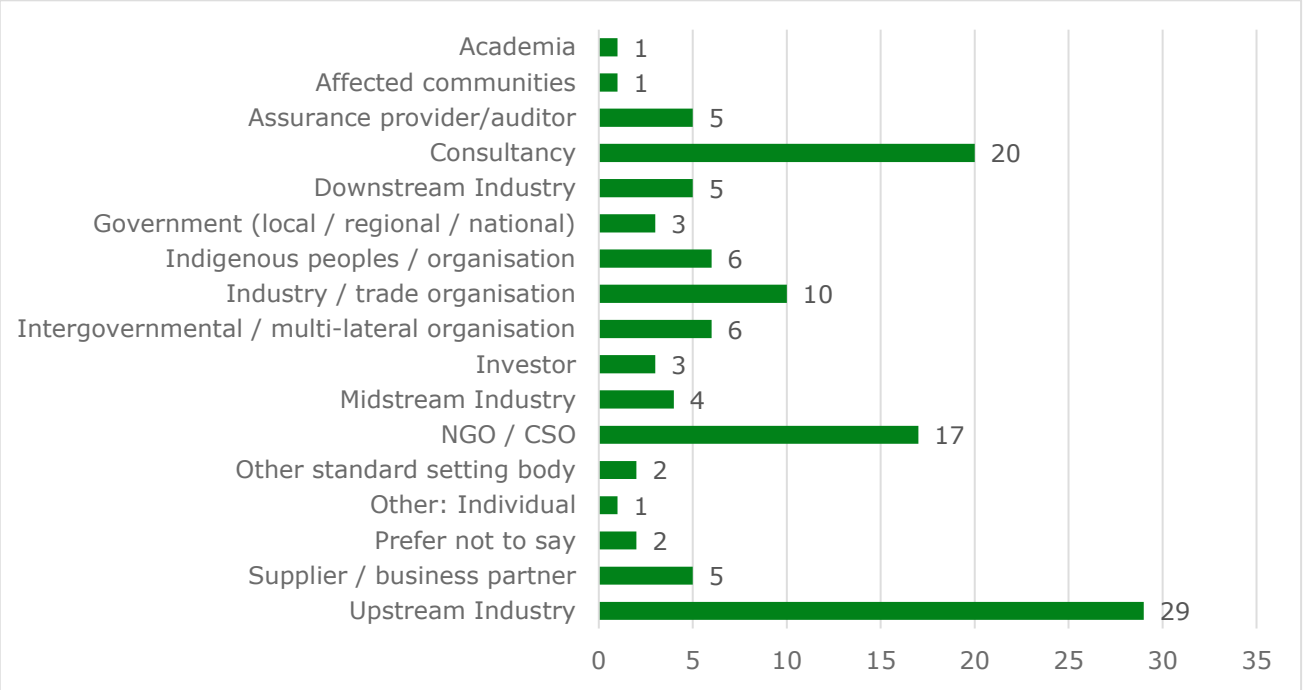
FIGURE 4-3 WORLD MAP OF RESPONDENTS AND SIGNATORY ORGANISATIONS



4.2 STAKEHOLDER TYPES

During registration, the 120 respondents self-selected their stakeholder type (Figure 4-4). The top three stakeholder types represented by number of respondents include Upstream Industry (24 percent of respondents), followed by Consultancies (17 percent) and NGOs/CSOs (14 percent).

FIGURE 4-4 RESPONDENTS BY STAKEHOLDER TYPE



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

5. GENERAL QUESTION ANALYSIS

The CMSI incorporated seven general questions on how well aspects of the draft documents aligned with stakeholder expectations to allow a clearer quantitative analysis of respondents' overall perception of the draft documents. Stakeholders responded to questions on a rating scale ranging from *'1: Significantly below expectations'* to *'5: Significantly exceeds expectations'* and could provide additional context on their response through an optional text box.

Responses were provided by 102 respondents across seven general questions. Note that respondents were not required to select an answer for all questions; therefore, nonresponses have been filtered from the dataset.

For all questions, most respondents indicated that the proposed documents meet, exceed, or significantly exceed expectations. Additionally, five questions were included in both the first public consultation and the second and final consultation period. For all five questions, the share of *meets*, *exceeds*, or *significantly exceeds expectations* remained consistent or increased in the second and final consultation.

The table below (Table 5-1) details the percentage of all respondents who indicated that the content *meets, exceeds,* or *significantly exceeds expectations* versus indication that the content was *below expectations*.

TABLE 5-1 SUMMARY OF GENERAL QUESTION RESPONSES FOR ALL STAKEHOLDER TYPES

Question	*	**% All Respondents**
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**?	+	**74**
	-	26
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**?	+	**66**
	-	34
Do the **requirements meet your expectations for being sufficiently clear** to support consistent and practical implementation and to achieve necessary performance improvement?	+	**61**
	-	39
Does the **scope, content, and narrative style** of the consolidated standard meet your individual expectations for responsible production practices?	+	**74**
	-	26
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?	+	**70**
	-	30

Question	*	% All Respondents
From your perspective, does the **Assurance Process** meet your expectations of a **robust, credible, replicable, and transparent approach?**	+	**70**
	-	30
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?**	+	**74**
	-	26

Notes:
% = percent
* '+' indicates combined *meets expectations, exceeds expectations,* and *significantly exceeds expectations* responses and '-' indicates combined *below expectations* and *significantly below expectations* responses.
** The updated Governance Model was not part of the second public consultation.

The table below (Table 5-2) illustrates response rates for *meets, exceeds,* or *significantly exceeds expectations* compared to response rates for *below* or *significantly below expectations* for the five questions that were part of both the first and final public consultation periods. Four questions received a higher rate of *meets, exceeds,* or *significantly exceeds expectations* in the final consultation. The Assurance Process approach received the same response rate.

TABLE 5-2 CHANGE IN RESPONSE RATES BETWEEN FIRST AND FINAL CONSULTATION FOR APPLICABLE QUESTIONS

	*	% All Respondents First Consultation	% All Respondents Second and Final Consultation	% Change
Ability of the CMSI to Improve Performance	+	**63**	**66**	**+3**
	-	37	34	
Clarity and Applicability of Requirements	+	**56**	**61**	**+5**
	-	44	39	
Scope, Content, and Narrative of Standard	+	**67**	**74**	**+7**
	-	33	26	
Three-Level Performance Structure	+	**66**	**70**	**+4**
	-	34	30	
Assurance Process Approach	+	**70**	**70**	**0**
	-	30	30	

Note:
% = percent
CMSI = Consolidated Mining Standard Initiative or the Initiative
* '+' indicates combined *meets expectations, exceeds expectations,* and *significantly exceeds expectations* responses and '-' indicates combined *below expectations* and *significantly below expectations* responses.

The table below (Table 5-3) summarises the share of responses from stakeholder types that had five or more respondents.

Supplier/ Business Partners and Assurance Provider /Auditors had a notably high *meets, exceeds,* or *significantly exceeds expectations* response rate for a majority of questions, with 100 percent responding that the improvement over the original Standard, ability of the Standard to Improve Performance, Assurance Process approach, and ability of the Claims Policy to drive performance improvement *meets, exceeds,* or *significantly exceeds expectations*. Consultancy respondents also had a high rate of responses indicating that all questions *meet, exceed,* or *significantly exceed expectations* above 78 percent for all questions.

Upstream Industry respondents have a slightly higher *meets, exceeds,* or *significantly exceeds expectations* response rate for all questions as compared to Downstream Industry respondents. Downstream Industry respondents had a notably low *meets, exceeds,* or *significantly exceeds expectations* response rate on the ability of the Standard to Improve Performance.

NGO/CSO respondents had the highest rate of did not meet expectations responses for all questions, with the clarity and applicability of requirements receiving the highest rate of *did not meet expectations* responses at 77 percent and ability of the Claims Policy to drive performance improvement receiving the highest rate of *meets, exceeds* or *significantly exceeds expectations* at 50 percent.

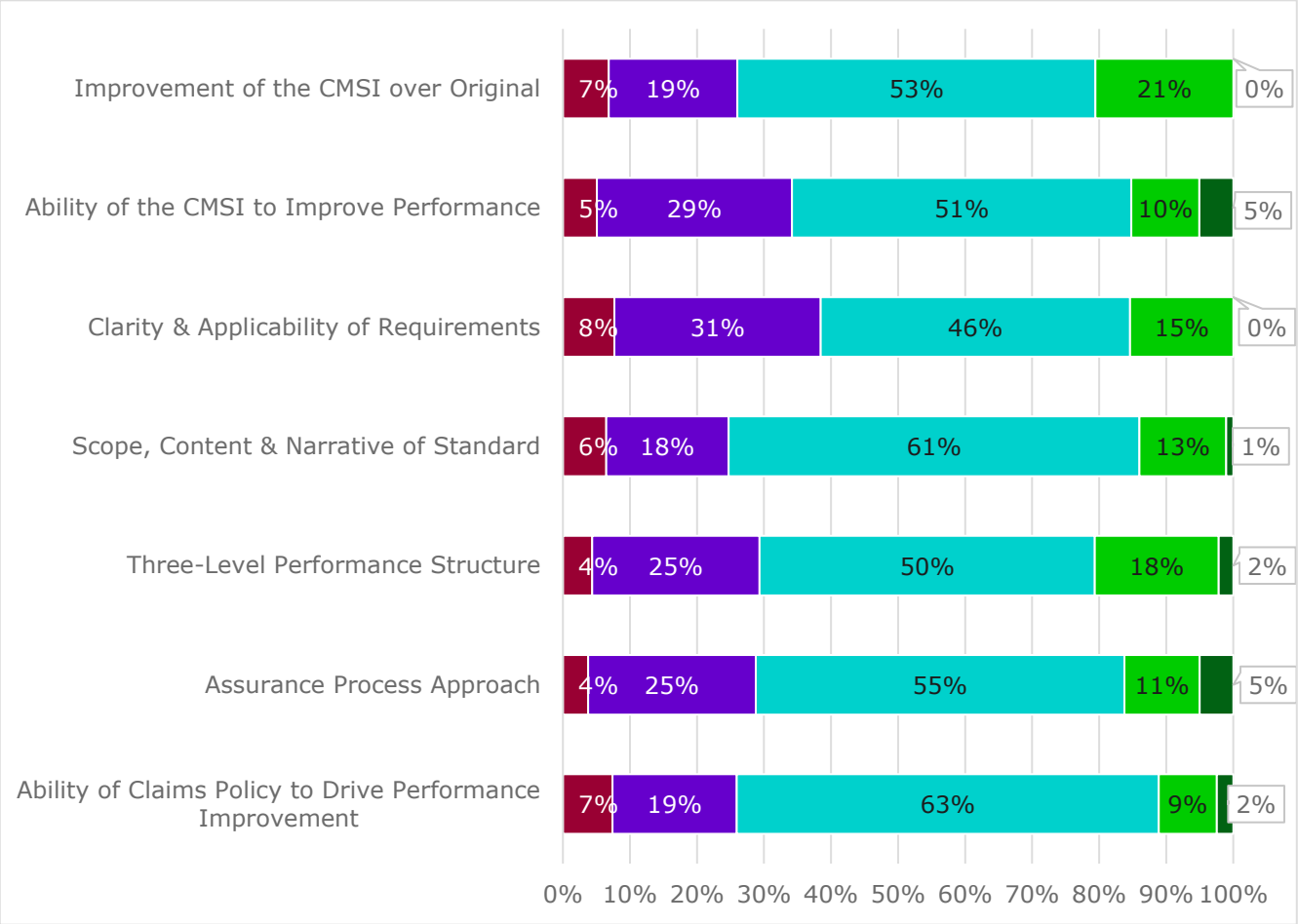
The chart below details the share of the responses to each question, excluding nonresponses. The most common response to all seven questions was *meets expectations*, at 49 to 63 percent for all questions.

TABLE 5-3 SUMMARY OF GENERAL QUESTION RESPONSES FOR STAKEHOLDER TYPES WITH FIVE OR MORE RESPONDENTS

	*	% Upstream Industry	% Consultancy	% NGO/CSO	% Industry/ Trade Organisation	% Downstream Industry	% Supplier/ Business Partner	% Assurance Provider / Auditor
Improvement of the CMSI over Original	+	**83**	**91**	38	**50**	**80**	**100**	**100**
	-	17	9	**62**	50	20	0	0
Ability of the CMSI to Improve Performance	+	**58**	**79**	42	**57**	40	**100**	**100**
	-	42	21	**58**	43	**60**	0	0
Clarity and Applicability of Requirements	+	**75**	**78**	23	**57**	**60**	**80**	**80**
	-	25	22	**77**	43	40	20	20
Scope, Content, and Narrative of Standard	+	**81**	**89**	**57**	**71**	**60**	**80**	**80**
	-	19	11	43	29	40	20	20
Three-Level Performance Structure	+	**81**	**88**	43	**57**	**60**	**60**	**80**
	-	19	12	**57**	43	40	40	20
Assurance Process Approach	+	**74**	**81**	30	**71**	**60**	**100**	**100**
	-	26	19	**70**	29	40	0	0
Ability of Claims Policy to Drive Performance Improvement	+	**62**	**93**	**50**	**86**	**60**	**100**	**100**
	-	38	7	50	14	40	0	0

Notes:
% = percent
CMSI = Consolidated Mining Standard Initiative; NGO/CSO = nongovernmental organisation / civil society organisation
* '+' indicates combined *meets expectations, exceeds expectations,* and *significantly exceeds expectations* responses and '-' indicates combined *below expectations* and *significantly below expectations* responses.
** The updated Governance Model was not part of the second public consultation.

FIGURE 5-1 GENERAL QUESTION RESULTS FOR ALL GENERAL QUESTION RESPONDENTS



Note:
% = percent
CMSI = Consolidated Mining Standard Initiative

5.1 GENERAL QUESTION FEEDBACK DETAILS

The following section provides an overview of optional text responses to each of the general questions.

TABLE 5-4 IMPROVEMENT OF THE CONSOLIDATED MINING STANDARD INITIATIVE OVER ORIGINAL

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	0	0	
Exceeds expectations	15	3	Clear improvement over original draft with stronger consistency, transparency, and inclusiveness; clearer performance pathways; and a more unified framework across the system. Some areas could benefit from practical examples and other content-specific revisions.

Meets expectations	39	7	The Standard has generally improved through revisions, though concerns remain about the Claims Policy and Assurance Process. Specific concerns include public disclosure, issues related to Indigenous Peoples, expected assurance costs, alignment with other Standards, and CMSI brand recognition.
Below expectations	14	8	While revisions addressed some issues, aspects of the Standard focus too much on verifying management systems and documentation over changes that would drive performance improvement. The Standard may be too extensive for some operators. Removing the Governance Model from consultation limits participation and meaningful engagement.
Significantly below expectations	5	4	Removing the Governance Model from the final consultation removed transparency and equitable access to development of the Standard, and final Governance Model does not reflect true multi-stakeholder governance. The scope of the Standard is not practical and overly demanding at the Towards Good Practice Level.

Note:
CMSI = Consolidated Mining Standard Initiative or the Initiative

TABLE 5-5 DETAILED RESPONSES TO ABILITY OF THE CONSOLIDATED MINING STANDARD INITIATIVE TO IMPROVE PERFORMANCE

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	4	2	System provides a strong global benchmark that is balanced, implementable, and challenging. It will ensure greater consistency, transparency, and measurable progress.
Exceeds expectations	8	1	Initiative is very good.
Meets expectations	40	7	Mapping Performance Areas against other Standards is needed. Overall impact will depend on consistent implementation, and scalability should be considered as some requirements may be difficult in emerging markets or for smaller, less resource-intensive facilities.
Below expectations	23	16	The Standard has been improved but may fall below other international standards and require further alignment. Further consideration is needed on the Governance Model.
Significantly below expectations	4	3	The Standard may be too complex and resource-intensive, which may limit adoption and reduce potential impact. Does not meet international human rights norms, including free, prior, and informed consent (FPIC) and protections for uncontacted Indigenous Peoples.

TABLE 5-6 DETAILED RESPONSES TO CLARITY AND APPLICABILITY OF REQUIREMENTS

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	0	0	
Exceeds expectations	8	1	Requirements are generally clear and well structured to support consistent implementation and continuous improvement.
Meets expectations	40	8	Some content, as currently written, may be impractical to implement and require further guidance.
Below expectations	23	13	Many requirements lack sufficient detail for implementation and supporting continuous improvement. Applicability criteria for some Performance Areas is ambiguous and Performance Areas across the Standard should be reviewed for consistency at each Practice Levels.
Significantly below expectations	7	5	The Standard contains excessive detail and overlapping requirements that create challenges to auditability and implementation as well as administrative burdens.

Note:
CMSI = Consolidated Mining Standard Initiative or the Initiative

TABLE 5-7 SCOPE, CONTENT, AND NARRATIVE OF STANDARD

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	1	0	
Exceeds expectations	12	2	Scope and Narrative are comprehensive and show significant improvement over earlier drafts. The Standard may be challenging for smaller producers to meet requirements: however, integration in a unified framework may reduce operation complexity for sites.
Meets expectations	57	8	The Standard sets high expectations and significant disclosure burdens, especially at the facility level, which may present barriers to adoption. Lack of independence of national panels is a concern for Extractive Industries Transparency Initiative (EITI) stakeholders.
Below expectations	18	12	While the Standard has improved, there is still misalignment with international frameworks, guidelines, and human rights law. There are gaps in engagement of stakeholders and vulnerable groups, free, prior, and informed consent (FPIC), use of explosives, and biodiversity.

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly below expectations	6	4	The Standard undermines international guidelines and best practices, especially regarding Indigenous Peoples and FPIC. The Standard is excessively comprehensive; should be revised to a more reasonable scope and accessible requirements; content should focus less on verifying systems and more on requiring facilities to demonstrate effectiveness.

TABLE 5-8 THREE-LEVEL PERFORMANCE STRUCTURE

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	2	0	
Exceeds expectations	17	2	Structure provides a clear and effective framework for guiding continuous improvement. Towards Good, Good, and Leading Practice Levels are well articulated and enable realistic entry points and progression pathways. Aggregate scoring at a Facility level is a good step forward.
Meets expectations	46	9	The structure generally meets expectations, but specific concerns remain, such as practicality for smaller operators; applicability to stand-alone refineries and smelters; score for nonconformance; incentive to pursue Leading Practice; and alignment with international standards.
Below expectations	24	16	Intention of the structure is positive, but inconsistency across Performance Areas remains. Further incentive to move to Good and Leading Practice Levels is needed.
Significantly below expectations	4	3	Standard lacks incentive for companies to progress beyond Good Practice Level and outcome evidence should be embedded at each level. The structure is inadequate for addressing Indigenous rights.

TABLE 5-9 DETAILED RESPONSES TO ASSURANCE PROCESS APPROACH

Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	4	0	
Exceeds expectations	9	3	Process is robust, transparent, and independence-focused; inclusion of stakeholder interviews strengthens credibility. Complexity may be a challenge for smaller facilities and further guidance may be needed on high-risk services that may affect consistent performance.
Meets expectations	44	6	Recurring assurance costs, including interviews, may deter adoption and mandating annual self-assessments may distract from focusing on improvements. Lack of major/minor nonconformance differentiation suggests lack of risk prioritisation. Methodology is generally consistent with other processes but there is uncertainty with Global Industry Standard on Tailings Management (GISTM) conformance.
Below expectations	21	16	Significant costs and administrative burdens; consider flexibility in cycle frequency. Requests for traceability mechanisms, clearer calculation methods, and minimum documentation requirements for social indicators. Risk of overreliance on facility-provided information could be reduced through neutral multi-stakeholder groups. Clarify continual improvement plans, significant events handling, and auditor availability and requirements.
Significantly below expectations	3	2	Standard is overly focused on management systems and documentation rather than outcomes and evidence. Auditability due to vagueness and mining company control over audit process is a concern.

TABLE 5-10 DETAILED RESPONSES TO ABILITY OF CLAIMS POLICY TO DRIVE PERFORMANCE IMPROVEMENT

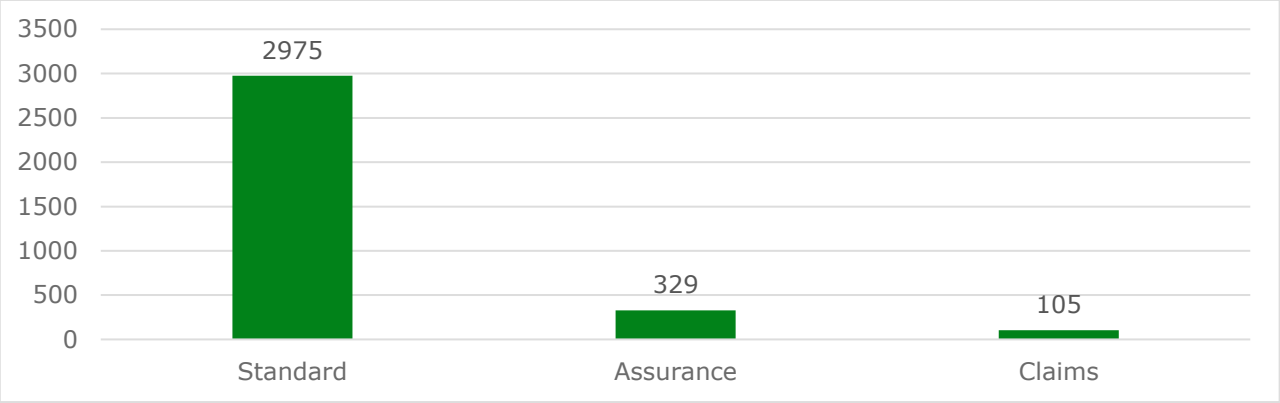
Response	Total Responses	Number of Optional Text Responses	Summary of Optional Text Responses
Significantly exceeds expectations	2	0	
Exceeds expectations	7	3	Transparency is strong and encourages accountability and continuous improvement. The Policy is well structured and straightforward but could benefit from simplifying terminology, providing practical examples, and guidance on communicating claims.
Meets expectations	51	7	Equivalency mapping with other standards is needed. Solutions to address performance-claim retention, flexibility through time-bound Corrective Action Plans, and clearer guidance on aggregated score calculation should be considered.
Below expectations	15	11	Policy does not reflect dynamic nature of mining and processing operations which can lead to fluctuations in sustaining performance. Further incentive is needed to promote Standard adoption and path to Leading Practice. Smaller facilities may be overburdened by costs or complexity for implementation. Clarity is needed on how 80 percent threshold for achievement is defined.
Significantly below expectations	6	5	Requirement to close 100 percent of gaps to maintain claims is inflexible and contrary to continuous improvement, and rigid timelines for closing gaps may be unrealistic or penalise facilities. Certification at 80 percent fulfillment may be perceived as misleading. Self-assessments to adjust aggregate scores undermines independent assurance and may incentivise misreporting. Lack of tiered recognition reduces incentivisation and could disincentivise high-performers.

6. FEEDBACK ANALYSIS

During the final public consultation, 3,409 comments were received from 110 of the 120 respondents[3] across the three draft documents. Comments were received from stakeholders in 29 countries and in three languages: English, Spanish, and Portuguese.

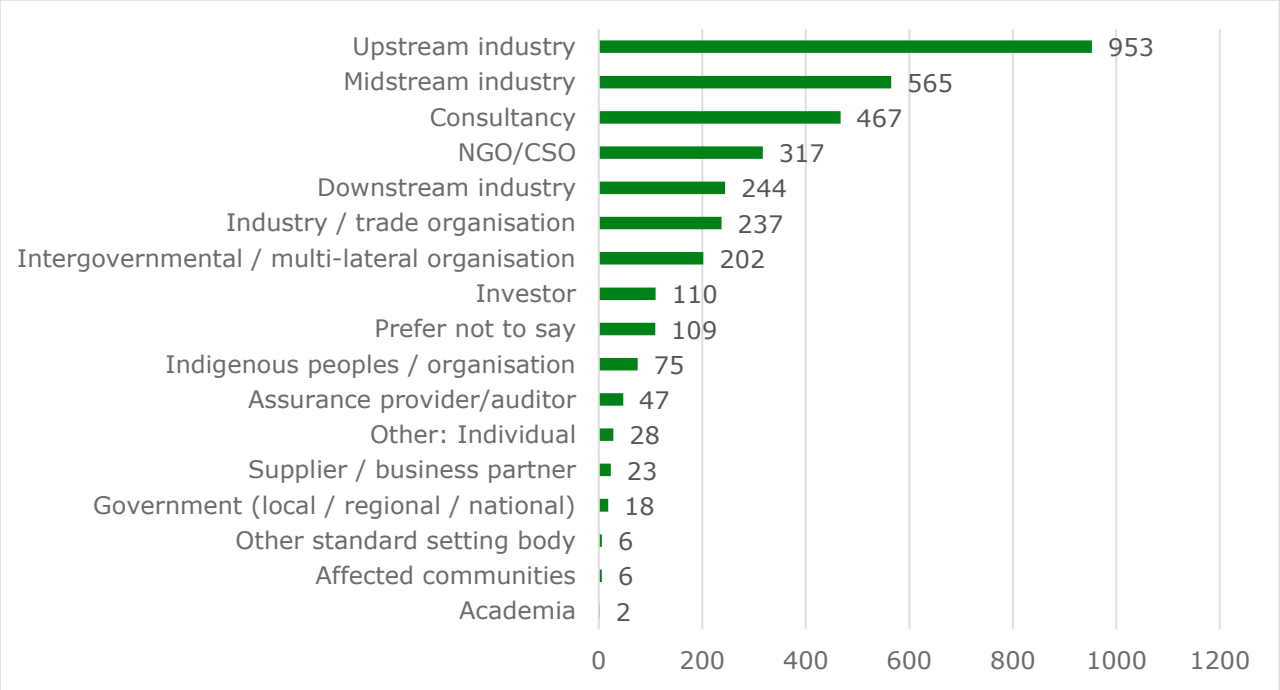
As shown by the chart below (Figure 6-1), the Consolidated Standard received 2,975 comments, followed by 331 comments on the Assurance Process and 103 comments on the Claims Policy.

FIGURE 6-1 NUMBER OF COMMENTS BY DOCUMENT



Notes:
Standard = Consolidated Standard; Assurance = Assurance Process; Claims = Claims Policy

FIGURE 6-2 NUMBER OF COMMENTS BY STAKEHOLDER TYPE



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

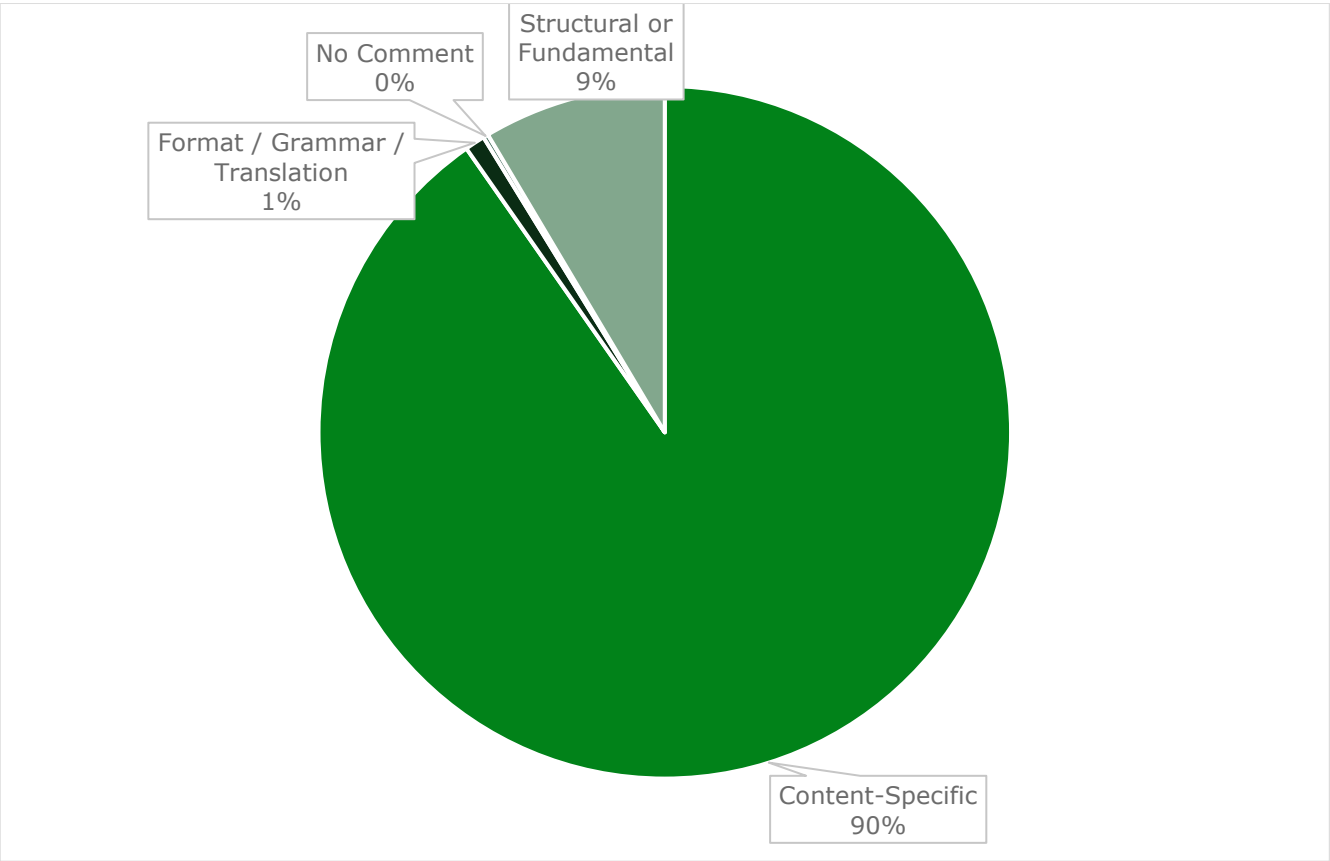
[3] Of the 120 total respondents, 110 submitted comments and/or uploaded documents containing comments and 102 responded to the general questions survey.

As shown in Figure 6-2, Upstream Mining Industry stakeholders submitted 953 comments (28 percent) on the draft documents, followed by Midstream Industry stakeholders at 565 comments (17 percent) and Consultancy stakeholders at 467 comments (14 percent).

6.1 TYPES OF COMMENTS RECEIVED

Comments were categorised into four main types: Content-Specific; Structural or Fundamental; Format, Grammar or Translation; and No Comment. As shown on Figure 6-3, a majority of comments were content specific, at 3,078 comments (90 percent), followed by Structural or Fundamental comments at 291 (9 percent). Approximately one percent of comments were related to formatting, grammar, or translation issues, and less than one percent of comments contained no material feedback.

FIGURE 6-3 TYPES OF COMMENTS RECEIVED



Note:
% = percent

6.1.1 CONTENT-SPECIFIC FEEDBACK

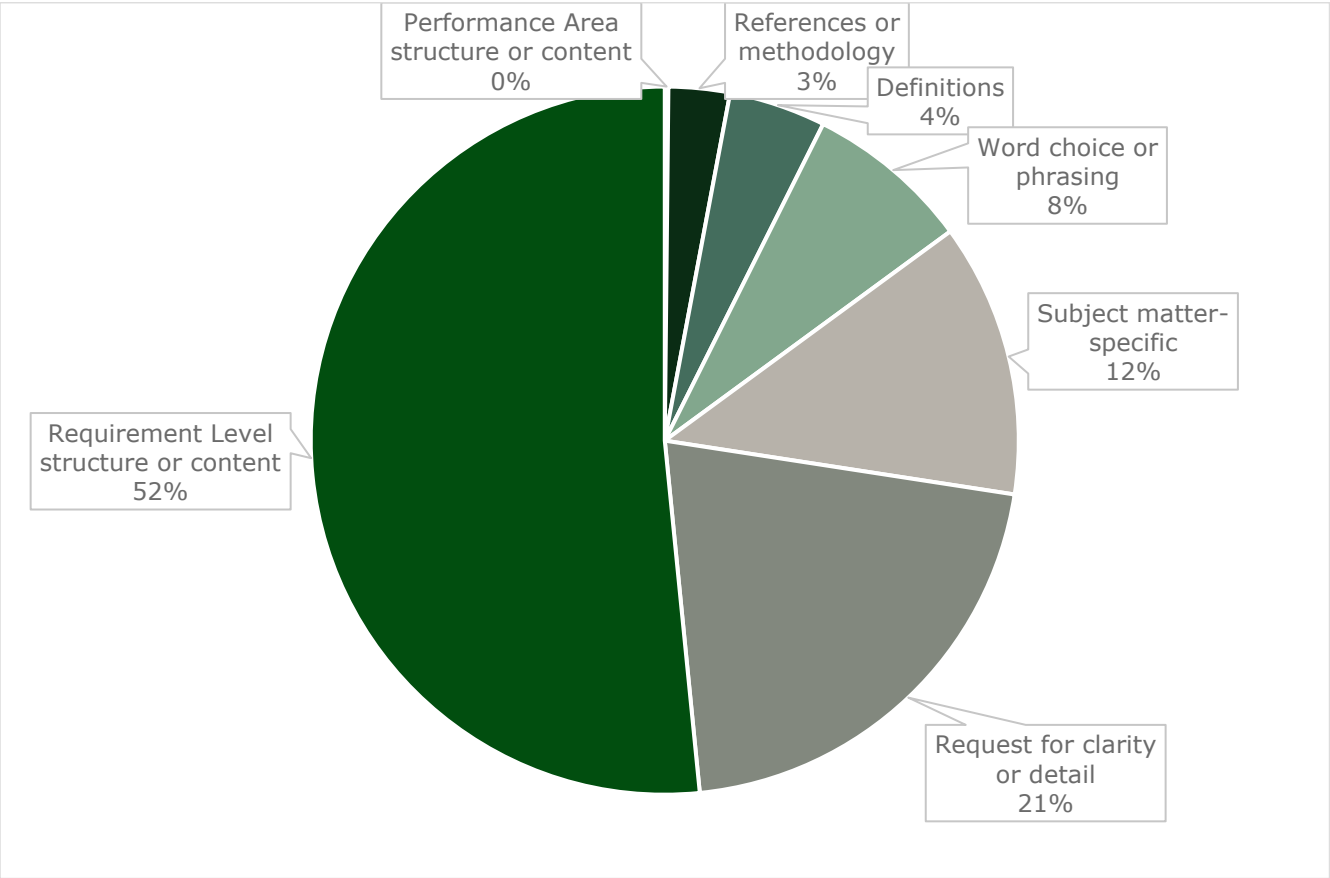
Content-specific feedback includes comments related to:

- Definitions;
- Word choice or phrasing;
- Request for clarity or detail;
- Subject matter-specific content;
- Performance Area structure or content;

- Requirement Level structure or content; or,
- References or methodology.

A majority of content-specific comments were related to requirement structure or content (55 percent), followed by requests for clarity or phrasing changes (22 percent; Figure 6-4).

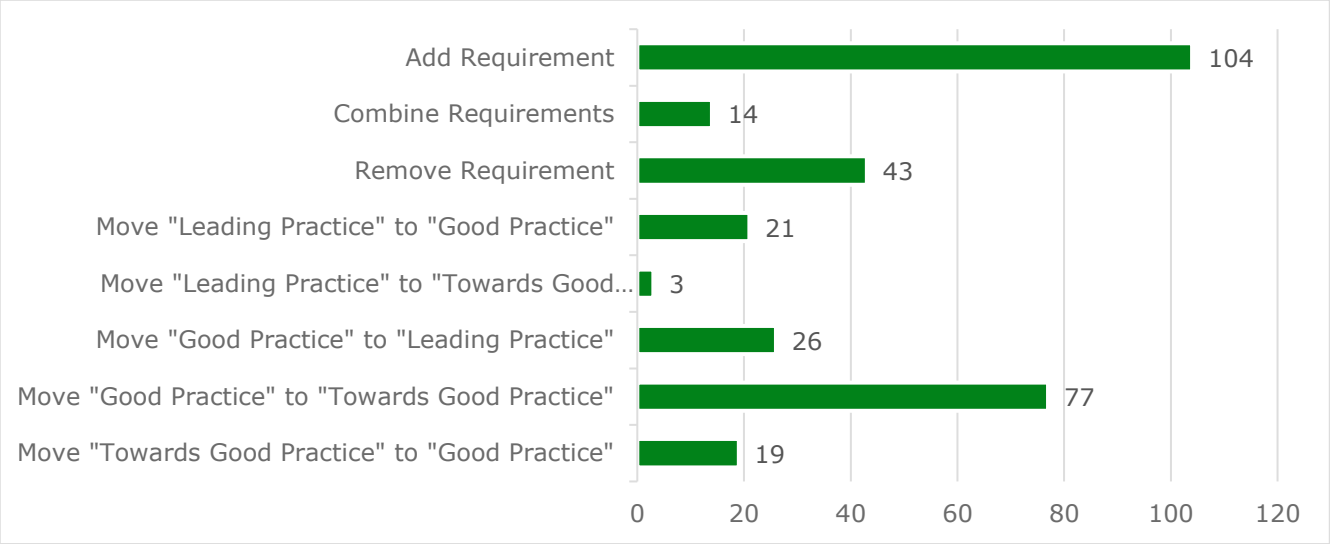
FIGURE 6-4 CONTENT-SPECIFIC COMMENTS



Note:
% = percent

Many of the comments focused on Requirement Level structure or content. Subject matter–specific comments included requests to add, remove, combine, or change the Practice Level of a requirement. The figure below (Figure 6-5) details the number of comments suggesting Requirement changes.

FIGURE 6-5 COMMENTS SUGGESTING A REQUIREMENT ADDITION, REMOVAL, COMBINATION, OR LEVEL CHANGE



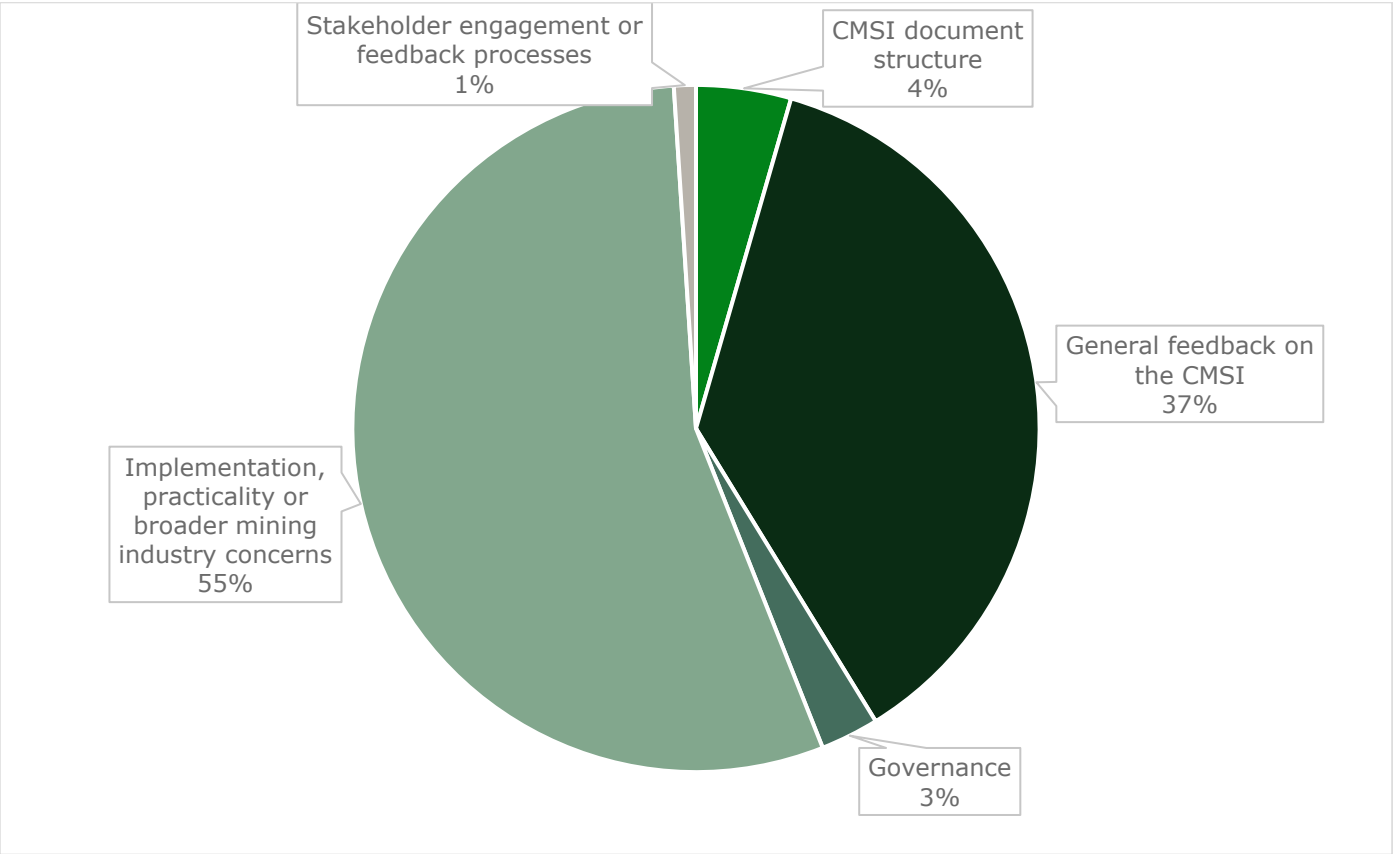
6.1.2 STRUCTURAL OR FUNDAMENTAL FEEDBACK

Feedback categorised as Structural or Fundamental generally includes broad comments addressing the entire Standard, related to issues of implementation or practicality, and related to general governance or the Governance Model[4] in particular.

More than half of structural or fundamental comments were related to the implementation or practicality for the mining industry, such as costs, details related to implementation, or equivalency with other standards. General feedback on the overall Standard (37 percent of comments) included broad opening statements included with submissions, comments applicable to the entire Standard, or comments related to the overall Initiative. A smaller share of comments was related to the structure of the documents, the Governance Model as referenced in Assurance, or comments included in the first public consultation. The chart below (Figure 6-6) details the share of Structural or Fundamental comment types.

[4] The updated Governance Model was not part of the final public consultation.

FIGURE 6-6 TYPES OF STRUCTURAL OR FUNDAMENTAL FEEDBACK



Note:
% = percent

6.2 OVERARCHING FEEDBACK

6.2.1 STANDARD CONTENT, IMPLEMENTATION, AND AUDITABILITY

Much of the overarching or general feedback on the Standard addresses concerns related to the implementation, auditability, general consistency across Performance Areas and Practice Levels, and gaps or considerations not fully addressed in the content of the Standard.

Complexity of Standard

The complexity and prescriptiveness of requirements may be too extensive or onerous for some facilities to adopt, especially for small and medium-sized enterprises in developing economies. Implementation, auditing, and timeline constraints may place significant resource burdens on operators and make adoption impractical.

Consider Phased, Materiality, or Risk-based Approach

Some stakeholders suggest a phased implementation approach based on site-level risk to enable reasonable timelines for implementation and help smaller operators progressively meet requirements. Others suggest a materiality-based approach for facilities to focus resources on most meaningful improvements.

Practice Levels

Many respondents recognise improvements in consistency across Practice Levels, though the change from Foundational Practice Level in the first consultation draft to the current Towards Good Practice Level received mixed feedback.

Further clarity between practice levels is needed in some areas. Some stakeholders express concern that the Towards Good Practice Level contains some requirements that are unacceptably low or that the applicability or non-applicability of certain criteria may make achieving Leading Practice difficult.

Need for Further Implementation Guidance and Consistency Across Performance Areas

Some aspects of the Standard are difficult to verify objectively or it is difficult to determine minimum expectations. Phases such as 'demonstrate meaningful engagement', 'make documented progress', 'where feasible', and 'where appropriate' are difficult to audit without defined indicators or criteria to support consistent assurance. In contrast, some stakeholders requested phrasing such as 'where feasible' and 'where appropriate' to provide flexibility on applicability. Clarity on scope and frequency for management plans and procedures should be provided and linked with audit cycle.

Further clarity or consolidation is needed for topics that cross multiple performance areas, such as grievance mechanisms and public disclosures. Terminology on overlapping concepts or requirements needs to be consistent and a matrix or other mapping tools should be included to provide additional clarity.

Regional and Country-specific Considerations

Clearer guidance or examples are needed for regional and country-specific considerations to align with national mining regulations and local expectations and realities. Respondents note significant concern for facilities based in Africa, Scandinavia, and South America.

Terminology may also vary by region or jurisdiction; the Standard should offer context-sensitive interpretive advice to reflect regional differences in law, government, or social organisation.

Applicability to Various Facilities

Clarity is needed for the scope and the applicability of the Standard to facilities and entities such as exporters, traders, smelters, and refineries. As written, several requirements are difficult to interpret or implement without mining activities.

Disclosures and Aggregation

Some stakeholders expressed concern about the extent of public disclosures at the facility level. The amount of information expected to be disclosed may add to reporting burdens or undermine intended goals of the Assurance Process. The purpose of disclosures should be clarified and facilities should decide which impacts are most relevant to disclose.

6.2.2 ASSURANCE PROCESS AND CLAIMS POLICY

Concern for Costs and Complexity of Assurance

The need for independent assessments, complexity of requirements, and potentially limited pool of approved assurance providers may increase costs and make assurance processes difficult. The current Standard could pose significant administrative and financial burdens on facilities without increasing assurance quality. There is also the risk of audit fatigue. A formal mechanism to recognise equivalencies from existing standards or a tiered pricing approach to accommodate operators based on revenue or size could be possible improvements to reduce strain.

Transparency and Oversight of Assurance

Some feedback expresses concern about the transparency and oversight of assurance, noting a reliance on self-reporting and the perception that mining companies may have too much control over the auditing process. NGO/CSO stakeholders in particular note that further detail is needed to appropriately assess how companies or facilities met or did not meet Requirements, whether specific Requirements were or were not applicable, and how corrective actions identified by assurance providers will be made public.

Further Clarity on Claims Details

Stakeholders suggest further distinction is needed between different claims and that further incentives are needed for achieving Leading Practice. Introducing more flexibility to the achievement thresholds, such as allowing a facility that meets at least 80 percent of the Leading Practice requirements to be recognised as Leading Practice may be a more appropriate standard for achievement. Additionally, stakeholders request flexibility around time-bound corrective actions while also protecting certain red-line areas such as human rights and FPIC.

6.2.3 EQUIVALENCY AND REFERENCES

Across general feedback and Performance Areas, respondents request equivalency mapping with other standards including: Aluminium Stewardship Initiative (ASI), Global Industry Standard on Tailings Management (GISTM), ICMM Performance Expectations, IFC PS, Joint Due Diligence Standard (JDDS), Initiative for Responsible Mining Assurance (IRMA), International Organization for Standardization (ISO), London Bullion Market Association (LBMA), London Metal Exchange (LME), Organisation for Economic Co-operation and Development (OECD) Guidance, Towards Sustainable Mining (TSM) protocols, the Copper Mark's Risk Readiness Assessment (RRA), and United Nations Guiding Principles (UNGP). Stakeholders suggest that such equivalencies and additional references may promote consistency and stronger safeguards for communities. For example, midstream and downstream industry, investors, and NGO/CSO stakeholders suggest applying IFC PS to promote consistency and stronger safeguards in Performance Area 4, New Projects, Expansions, and Resettlement, and Performance Area 15, Cultural Heritage.

Comments emphasise the importance of equivalency mapping prior to launch to support implementation, prioritisation, and recognition with stakeholders, investors, and value chain companies.

Some comments also suggest additional references to consider, or suggestions to remove certain references that may become outdated.

6.2.4 GOVERNANCE

Some general comments and comments on the Assurance Process addressed issues related to governance, including the role of national panels, potential imbalances on board composition, and ability to meet multi-stakeholder governance. Stakeholders also expressed concern that the Governance Model was not included in the second and final consultation which conflicts with multi-stakeholder governance expectations.

6.3 CROSS-CUTTING THEMES

6.3.1 INDIGENOUS PEOPLES AND COMMUNITIES

In addition to comments on Performance Area 14, Indigenous Peoples, feedback across general comments and other Performance Areas reference Indigenous Peoples and communities. Many comments provide suggestions to explicitly mention the involvement or engagement of Indigenous Peoples in other Performance Area contexts, such as Performance Area 4, New Projects, Expansions, and Resettlement; Performance Area 12, Engagement; Performance Area 15, Cultural Heritage; and Performance Area 17, Grievance Management.

Other comments focus on working definitions of Indigenous Peoples, equivalency to other standards focusing on Indigenous Peoples, and improvements on requirements related to Indigenous Peoples from the first consultation.

Feedback from Indigenous Peoples and communities and NGO/CSO stakeholders note concerns that language in Performance Area 14 and other relevant Performance Areas appears to treat FPIC as a procedural issue rather than an outcome and as a binding right. Comments request specifying that there is consent with the right to give, withhold, or withdraw at any time—especially for relocation and critical cultural heritage. Comments across stakeholder types, including both Indigenous Peoples and communities and industry stakeholders note specific gaps or areas where additional reference to FPIC is needed. Comments from industry stakeholders request clarification that FPIC is not a veto power; express concern about jurisdictional alignment with State-led consultation processes; and request further specificity for situations where FPIC is not achieved or negotiations are declined.

6.3.2 GENDER

Comments across several Performance Areas speak to the need to identify gender-specific considerations within requirements as currently written or suggest additional gender-specific considerations to add. Overarching comments suggest that some requirements may need to specify culturally sensitive approaches for diverse contexts, and that some requirements may need clearer parameters to define ‘consideration’ of the needs of women. Additionally, there is mixed feedback on requirements needing public disclosures and how to handle sensitive data.

There is also mixed feedback on whether to specify women in varying contexts; for example, there is feedback on whether women should be mentioned explicitly in addition to using phrases such as ‘vulnerable and underrepresented groups’ to include genders.

In Performance Area 4, several comments suggest gendered land and asset baselines, gender-equitable replacement options, and resettlement plans and livelihood restoration programmes specifically for women. In Performance Area 5, comments suggest human rights due diligence should include a gender and intersectional risk analysis. In Performance Area 12,

comments suggest additional considerations for barriers to participation in engagement that are specific to women.

6.3.3 GRIEVANCE MECHANISMS

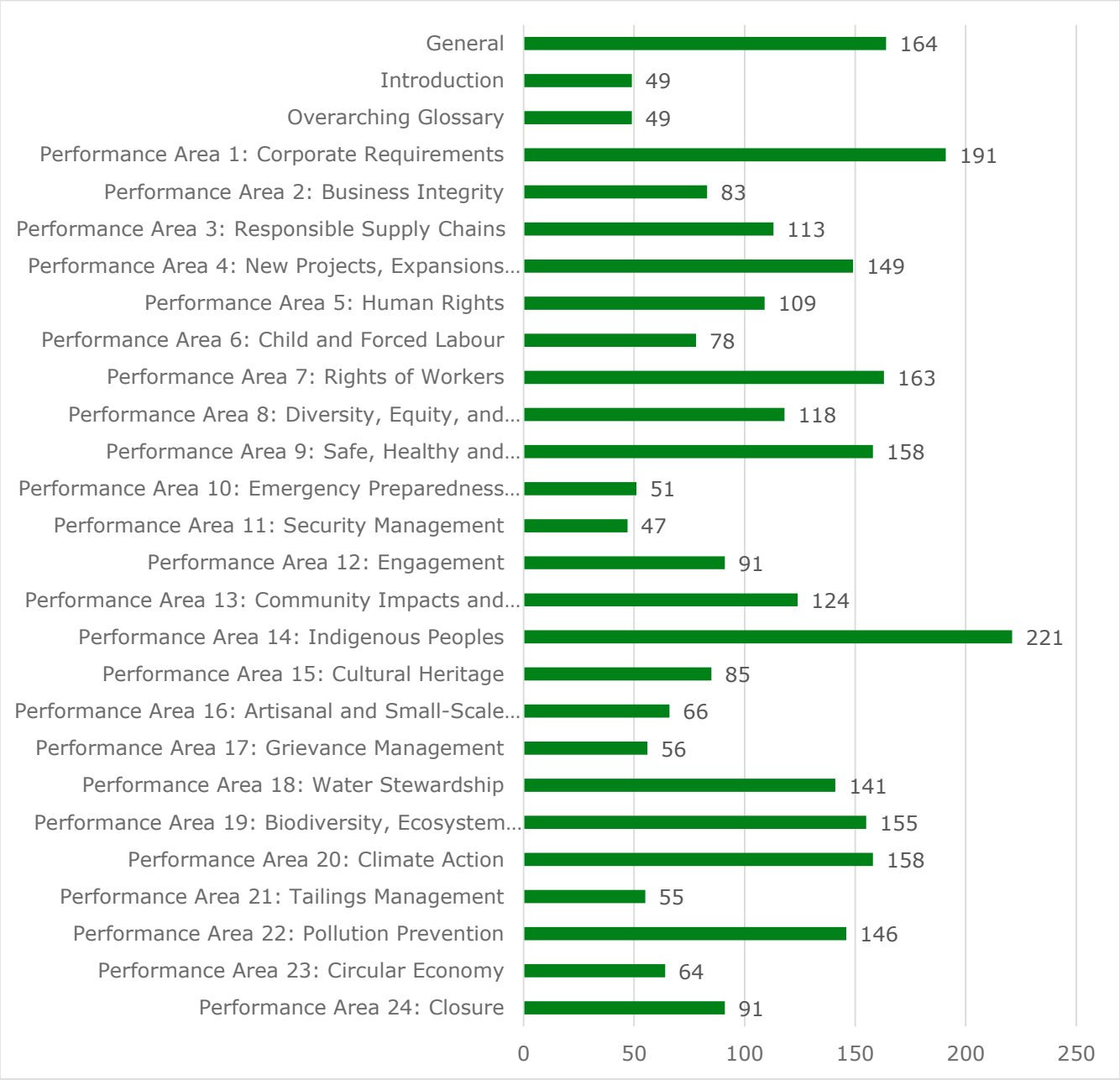
Overarching feedback and comments across Performance Areas request consistent guidance on grievance mechanisms across Performance Areas, such as a matrix or other resource to show how grievance mechanisms apply across Performance Areas. There are also requests to specify culturally appropriate grievance mechanisms and to align with UNGP effectiveness criteria.

6.4 CONSOLIDATED MINING STANDARD

Stakeholders submitted 2,975 comments on the draft Consolidated Standard document from 105 respondents.

All 24 Performance Areas received comments, with the volume of comments per Performance Area ranging from as high as 221 comments on Performance Area 14 to as low as 47 comments on Performance Area 11. The chart below (Figure 6-7) shows the number of comments on the Introduction, Overarching Glossary, 24 Performance Areas, and general comments on the Standard.

FIGURE 6-7 NUMBER OF COMMENTS BY PERFORMANCE AREA



The Performance Area analyses below (subsections 6.4.1–6.4.26) include a summary of the comments on the Standard Introduction and Overarching Glossary, followed by a summary of the feedback for each of the 24 Performance Areas. Each summary includes the intent as published in the draft Consolidated Standard, number of comments, number of respondents, number of sections, and a high-level summary of the feedback submitted. A chart highlights the number of comments by the top three to five stakeholder groups that commented on each Performance Area.

6.4.1 STANDARD INTRODUCTION

49 total comments		28 respondents
Top 4 Stakeholder Groups Providing Comments		**Number of Comments on Performance Area Sections**
Upstream industry	10	
Consultancy	10	
Midstream industry	8	
Intergovernmental/ multi-lateral organisation	6	
All other types	15	

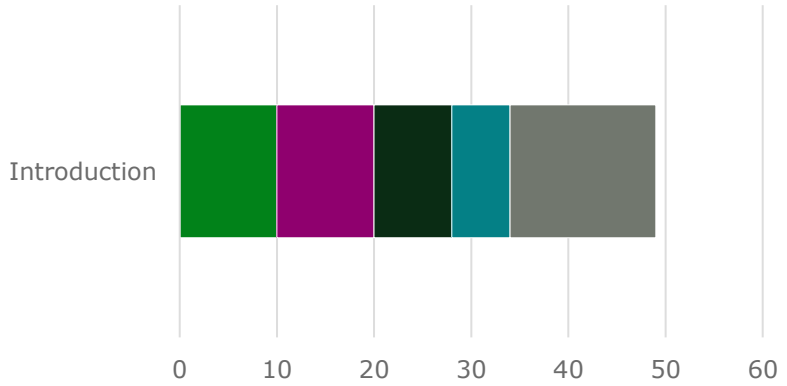


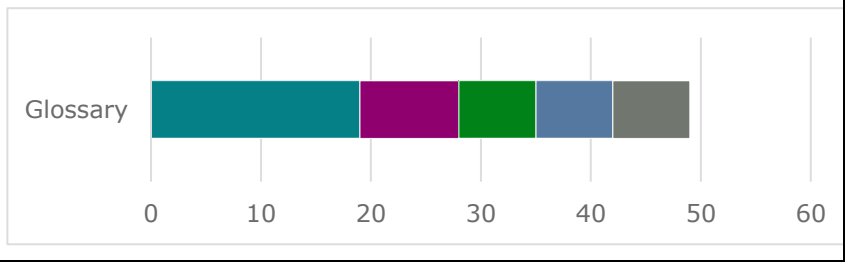
TABLE 6-1 FEEDBACK FOR INTRODUCTION SECTION

Introduction Section	Feedback
3) Levels of Performance	• Ensure consistency across Performance Areas by defining clear criteria for what constitutes Towards Good Practice and Good Practice.
4) Implementation of the Consolidated Standard	• Acknowledge and clarify intentional overlap or duplication of requirements between certain Performance Areas. • Clarify which requirements are applicable to pre-operational activities and new projects. • Reframe the statement 'While the standard is not directly applicable to the exploration phase' to clarify that specific Performance Areas are applicable to the exploration phase. • Include Performance Area 15, Cultural Heritage, and Performance Area 19, Biodiversity, Ecosystem Services and Nature, in the list of Performance Areas that require implementation in the pre-operational phase of mine life. • Management system approach as outlined in the introduction is clear; however, references to management systems/processes throughout Performance Areas could be streamlined for consistency.
8) Key Terms and Guidance	• Existing Operations: Add considerations for operations that transition from care and maintenance back to operation. • New Project: Current framing of new versus existing projects ignores other intermediate categories such as brownfield redevelopments or restarts; clarify how the Standard applies to transitional project types for consistency and to avoid regulatory gaps; include all sequential mineral operations under respective mineral rights leading to commencement of mining including reconnaissance, exploration/prospecting, mining and mine site closure, and post-closure rehabilitation. • Policy commitments: Clarify areas where policy commitments must be adopted at corporate level, such as human rights. • Publicly disclose: Align definition between Key Terms and Guidance and Overarching Glossary; preference for definition in Key Terms and Guidance noted. • Use of mitigation hierarchy: Offset is also not possible in the case of World Heritage properties.

Introduction Section	Feedback
Other Feedback	• Prepare simplified implementation guides to support understanding for local communities and smaller operators. • In relation to participatory or joint monitoring, add considerations for facilities in jurisdictions where a Facility has no authority to alter monitoring methodologies or introduce participatory elements without interfering with governmental mandates, regulatory chain-of-custody requirements, multi-operator monitoring frameworks, or legal access restrictions.

6.4.2 OVERARCHING GLOSSARY

49 total comments		17 respondents
Top 5 Stakeholder Groups Providing Comments		**Number of Comments on Performance Area Sections**
Intergovernmental/ multi-lateral organisation	19	
Consultancy	9	
Upstream industry	7	
Assurance provider/auditor	7	
All other types	7	



Feedback on the Overarching Glossary generally consists of specific feedback on words or phrases already included in the glossary, as detailed in the table below (Table 6-2). A few comments also suggested additional phrases to include in the glossary, as detailed in a separate table below (Table 6-3).

Other feedback included a suggestion to expand the glossary to clarify differing terminology used at Towards Good, Good and Leading Practice Levels. For example, there were suggestions to explain the difference between 'in consultation', 'meaningfully engage', and 'collaborate' to differentiate engagement practices at different levels.

TABLE 6-2 FEEDBACK ON WORDS AND PHRASES IN THE OVERARCHING GLOSSARY

Word or Phrase as Written in Overarching Glossary	Feedback
Affected stakeholders	Refer to the definition of 'Affected stakeholders' in Office of the United Nations High Commissioner for Human Rights (OHCHR), Access to Remedy in Cases of Business-Related Human Rights Abuse (2024), page 26.
Assurance provider	Rephase definition to align with description of assurance providers from the Assurance Policy document.
At defined intervals	Include explicit reference to regulatory requirements in rationale for determining defined intervals.
Baseline data	Clarify how baseline data are determined.
Business partners	Clarify if communities in jurisdictions where Community Benefit Agreements are required are considered business partners due to potential contractual requirements; expand definition to include entities relevant to Facility's commercial activities such as shareholders.
Commitment	Specify that commitments also occur in non-public settings.
Corporate level	Clarify whether the referencing-related company controls the company, such as a majority shareholder, parent company, partner company, or similar.
Facility	Define in Overarching Glossary to clarify use throughout Standard; align definition with existing reporting obligations established for payments to government reporting laws, such as Chapter 10 of the European Union accounting directive, and similar laws in Canada, the United Kingdom, Norway, Switzerland, and other jurisdictions.
Implement	Definition is overly broad; add building reporting capability as part of implementation activities.

Word or Phrase as Written in Overarching Glossary	Feedback
Independent review of effectiveness	Include assessment of the organisation structure's ability to enable the operation of the management system under review, including whether people have sufficient authority and autonomy to fulfill their roles within management systems.
Indigenous Peoples	Align a working definition with financial institution policies, such as the World Bank Environmental and Sustainability Standard (ESS) No. 7.
Internal review	Add potential for hiring external auditors to conduct internal audit; clarify difference between 'internal review' and 'internal review of effectiveness'.
Management system	Consider reflecting International Organization for Standardization (ISO) definition of management system.
Monitoring	Reference the role of monitoring in regulatory compliance and identifying trends or thresholds for further intervention.
Publicly disclose	Algin with Section 8f from Introduction.
Relevant information	Include information determined as relevant to specific issues, metrics, or actions as agreed with affect stakeholders.
Remedy	Align definition with remedy as referred to in the case of adverse impacts to cultural heritage.
Report	Specify what 'international reporting frameworks' are acceptable to standardise interpretation and reporting practices.
Rights-holder	Remove 'abstain from human rights violations' as abstention should be inherent in protecting and respecting human rights; remove 'In general terms;'
Stakeholders	Alphabetise list of example stakeholders to avoid perception of prioritisation; add workers as stakeholders; remove phrasing related to 'affected by adverse impacts' as there is a separate definition for affected stakeholders.
Supplier	Rephrase to 'supplies products or services;' after 'entity', add '(natural person or legal person)'.
Sustainability risks	Refresh reference to Corporate Sustainability Due Diligence Directive (CSDDD); Add that mining projects may impact human rights directly or indirectly; Add references to International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
Unavoidable impacts	Strengthen definition to reflect definitions of 'impractical' used in legal language.

TABLE 6-3 SUGGESTED ADDITIONS TO THE GLOSSARY

Suggested Word or Phrase as New Addition	Suggested Definition or Considerations
Assurance/Assurer	Define 'assurance' and 'assurer' in addition to 'audit' and 'auditor'.
Positive impact	Consider how mining operations contribute positively to areas in which they operate.
Risks	Clearly state which types of risk (financial risks, climate risks, human rights risks, environmental risks) are covered by the Standard.
Significant business changes	Define as referenced in the Assurance Process to support consistent interpretation.

6.4.3 PERFORMANCE AREA 1: CORPORATE REQUIREMENTS

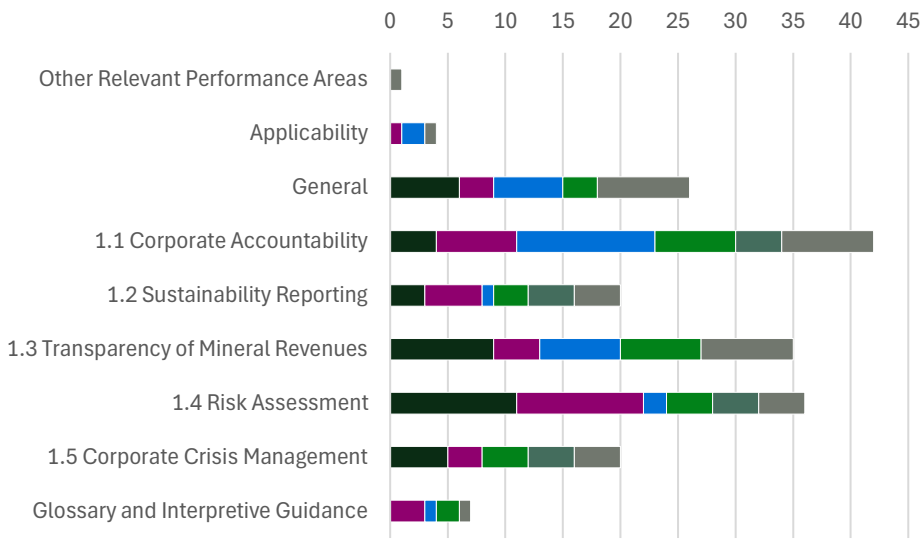
Intent *(as stated in the draft Standard)*
Define clear accountabilities and decision-making for sustainability at the board level and report annually on sustainability performance, including payments to governments, to enhance transparency and accountability of business practices. Maintain an up-to-date sustainability risk register and Corporate Crisis Response Plan to prepare for, mitigate, and manage potential risks and crises.

191 total comments	**50 respondents**	**5 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments

Midstream industry	38
Consultancy	37
NGO/CSO	31
Upstream industry	30
Downstream industry	16
All other types	39

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Consideration of differences between public and private companies as well as small and large companies needed; consider level of effort and proportionate, risk-based approaches.
- Further clarity needed on facility versus corporate implementation and assurance; requests for more definition of facility versus corporate, at potentially each requirement level.
- Concern that the corporate-level definition in this Performance Area differs from the Overarching Glossary.

TABLE 6-4 DETAILED FEEDBACK BY SECTION: SECTION 1.1

1.1 Corporate Accountability	
Towards Good Practice	• Facility-level policies are not appropriate for certain domains (e.g., Human Rights); suggest corporate-level adoption for these topics. • Industry stakeholders noted that the requirement to publicly disclose a policy or commitment for each performance area as the base level of performance is unrealistic; also noted the Standard should only require public disclosure for applicable areas.
Good Practice	• Questions on demonstrating 'integration' of the Standard into corporate strategy or investments given confidentiality and practical evidence constraints.

1.1 Corporate Accountability	
Leading Practice	• Mixed views on linking senior pay to sustainability metrics; questions on feasibility (e.g., state-owned entities) and clarity of metric scope. • Mixed views on placing Requirement 2 at Leading or Good Practice, as some note it is already expected under Extractive Industries Transparency Initiative (EITI).

TABLE 6-5 DETAILED FEEDBACK BY SECTION: SECTION 1.2

1.2 Sustainability Reporting	
Towards Good Practice	• Specify recognised base levels and minimum scope; concerns that without references, reporting becomes agnostic and less outcome oriented.
Leading Practice	• Requests for alignment to recognised frameworks: Global Reporting Initiative (GRI); International Financial Reporting Standards (IFRS); and S1/S2 of European Sustainability Reporting Standards (ESRS) / Corporate Sustainability Reporting Directive (CSRD); as well as clearer definitions or distinctions between impact and double materiality.

TABLE 6-6 DETAILED FEEDBACK BY SECTION: SECTION 1.3

1.3 Transparency of Mineral Revenues	
Towards Good Practice	• Strong support for project-level payments disclosures aligned with Extractive Industries Transparency Initiative (EITI) and requests to define 'material payments'. • Requests to include explicit legal safe harbours ('to the extent permitted by law'), disclosure of barriers, and clarity for non-EITI jurisdictions.
Good Practice	• Broad support for alignment with EITI, with requests to define the date and scope of 'new' contracts and clarify disclosure expectations and legal safe harbours in non-EITI jurisdictions. • Define the scope/location for contract disclosure and adapt wording to differing legal constructs across jurisdictions.
Leading Practice	• Some stakeholders suggest beneficial ownership should be at the Good Practice Level; others note assurance and audit practicality issues with requirements like 'encourage host government to join EITI'. • Recurrent requests to set a consistent date for existing and new contract publication.

TABLE 6-7 DETAILED FEEDBACK BY SECTION: SECTION 1.4

1.4 Risk Assessment	
Towards Good Practice	• Consider individual versus department or committee responsibility, criteria/methodologies for identifying and assessing risks, and corporate facility register alignment.
Good Practice	• Broad support for maintaining risk registers; requests to integrate mitigation/prevention, align with enterprise risk registers, and include change-management triggers. • Flexibility favoured in review cadences (such as 'at least annually or when material changes occur').
Leading Practice	• Mixed feedback on engaging external stakeholders and rights-holders; some see it as foundational, others flag practicality or confidentiality; requests to tie into Performance Area 12 engagement processes and specify when direct participation is appropriate. • Desire for clear guardrails or performance outcomes (e.g., acceptable risk thresholds, control effectiveness).

TABLE 6-8 DETAILED FEEDBACK BY SECTION: SECTION 1.5

1.5 Corporate Crisis Management	
Towards Good Practice	• Define what constitutes a credible Corporate Crisis Response Plan; link with workers, communities, Indigenous Peoples, and recognised frameworks.
Good Practice	• Requests for clarity and guidance on full crisis simulation exercise versus a table-top exercise. • Noted inconsistency between Performance Area 1, Section 1.5, which requires exercises every three years, while Performance Area 10 states they should be annual.

Glossary and Interpretive Guidance
• Corporate-level definition in this Performance Area differs from the Overarching Glossary. • The Extractive Industries Transparency Initiative (EITI) has a definition of 'project' which is inconsistent with the definition of 'project' within the Consolidated Mining Standard Initiative (CMSI).

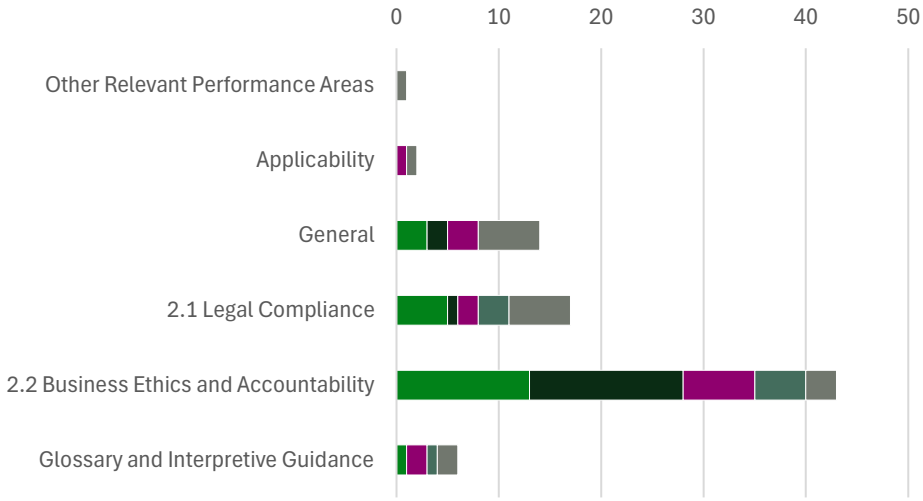
6.4.4 PERFORMANCE AREA 2: BUSINESS INTEGRITY

Intent *(as stated in the draft Standard)*
Establish systems to maintain compliance with applicable laws, conduct business ethically and with integrity and implement policies and practices to prohibit and prevent bribery and corruption, money laundering, and anti-competitive behaviour.

83 total comments	**25 respondents**	**2 Performance Area sections**

Top 4 Stakeholder Groups Providing Comments	
Upstream industry	22
Midstream industry	18
Consultancy	15
Downstream industry	9
All other types	19

Number of Comments on Performance Area Sections



Feedback Summary

- Alignment and reference to Organisation for Economic Co-operation and Development (OECD) and risk-based due diligence may be helpful and will provide additional guidance.
- Conflicting feedback on transparency of public disclosures, with several industry stakeholders noting risks of misinterpretation, sensitive information, and different jurisdiction requirements.
- Several comments noted that requirements should be applicable, owned, or managed at the corporate level, and clarify if corporate-level implementation can fulfill the facility requirement.
- Performance Areas 15 and 18 refer to Performance Area 2, but not vice versa.
- Whistleblower protections, concerns about disclosures, and becoming more general with reporting was suggested throughout.
- Additional definitions and references to guidance on material breaches, as well as direct and indirect monitoring of laws and political donations.

TABLE 6-9 DETAILED FEEDBACK BY SECTION: SECTION 2.1

2.1 Legal Compliance	
Towards Good Practice	• Clarify whether the legal obligations register includes contractual obligations. • One respondent noted that monitoring 'existing and emerging applicable laws' may be challenging and could be elevated to good practice.
Good Practice	• Clarify significant non-compliance; specify review frequency and independence.
Leading Practice	• Provide guidance on defining or measuring the effectiveness of compliance controls and processes.

TABLE 6-10 DETAILED FEEDBACK BY SECTION: SECTION 2.2

2.2 Business Ethics and Accountability	
Towards Good Practice	• Several noted workers should be expanded to include business partners and other contracted services.
Good Practice	• Know Your Counterparty (KYC) is broad and should be risk-tiered and board-approved at corporate level with triggers for enhanced due diligence and rescreening. • Clarify overlaps where policy may duplicate Code of Conduct. • Suggestions to reference human rights.
Leading Practice	• Requirement 4: Concerns related to whistleblower disclosure and how disclosures could raise privacy and legal concerns. • Requirement 5: Concerns from industry stakeholders about how, and to what extent, disclosures are required.

Glossary and Interpretive Guidance

- Public disclosure scope and proportionality: Clarify what must be publicly disclosed (e.g., fines, regulatory actions, approvals) and suggestions for disclosures to be proportionate, aggregated when appropriate, and compliant with local law/privilege/data privacy requirements.
- Legal compliance scope/definitions: Clarify whether contractual obligations and customary law are in scope. Note that regulatory action is not sufficiently defined.
- Clarify that significant regulatory actions do not include administrative/technical matters.
- Define and provide guidance on material breaches, monitor changes to applicable laws and political donations.

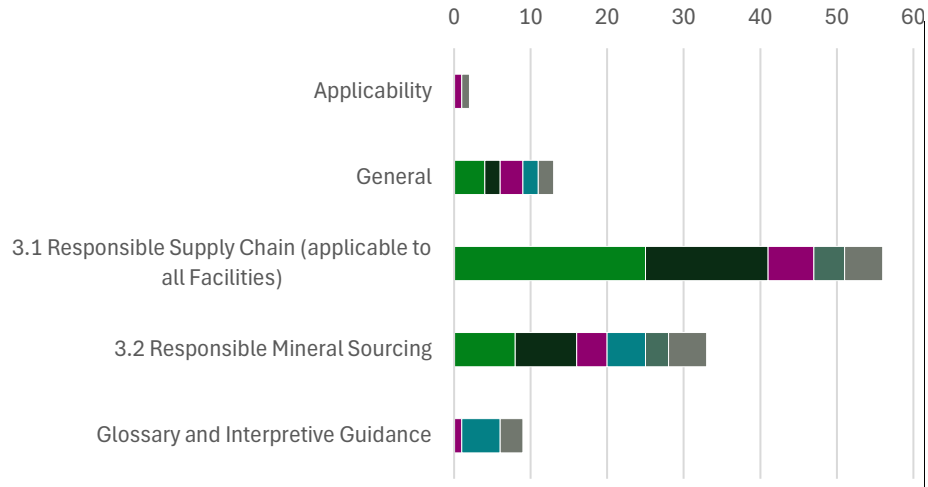
6.4.5 PERFORMANCE AREA 3: RESPONSIBLE SUPPLY CHAINS

Intent *(as stated in the draft Standard)*
Promote responsible business conduct in supply chains by implementing risk-based due diligence on suppliers to identify sustainability risks and impacts appropriate to the size and location of the Facility, the sector, and the nature of the products or services involved.

113 total comments	**37 respondents**	**2 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments	
Upstream Industry	37
Midstream industry	26
Consultancy	15
Intergovernmental/ multi-lateral organisation	12
Downstream industry	7
All other types	16

Number of Comments on Performance Area Sections



Feedback Summary

- Clarify terms including 'most significant parts or segments of the supply chain', 'reasonable action', 'defined intervals', 'where appropriate', and clarify use of the term, 'suppliers'.
- Clarify scopes of applicability related to traded and non-traded goods and services; supply chain due diligence; grievance mechanisms along transportation routes; and secondary materials for facilities processing mixed feedstocks.
- Clarify application of the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct where a company is already adopting the United Nations Guiding Principles (UNGPs).
- Performance Area could be challenging for junior mining companies, particularly if the public disclosure of a responsible supply chain policy is interpreted as a binding commitment.
- Resolve potential competition law conflicts.
- Clarify application of independent audits including scope and alignment with other schemes.

TABLE 6-11 DETAILED FEEDBACK BY SECTION: SECTION 3.1

3.1 Responsible Supply Chain (applicable to all Facilities)	
Towards Good Practice	• Clarify whether the assessment of sustainability risks applies to all procured goods and services or also to metals and minerals. • Clarify what should be expressed in contracts, including the phrase 'responsible business conduct'.
Good Practice	• Equivalency with other programmes and standards needed, including London Platinum and Palladium Market (LPPM) and United Nations Guiding Principles (UNGPs); Standard lacks central list of Organisation for Economic Co-operation and Development (OECD)–aligned frameworks provided. • Combine Requirements 1 and 2 and expand the text to include early warning systems.
Leading Practice	• Suggestion that collaboration should occur where feasible and appropriate, taking into account applicable competition law, confidentiality obligations, and geopolitical sensitivities to facilitate safe and lawful implementation.

TABLE 6-12 DETAILED FEEDBACK BY SECTION: SECTION 3.2

3.2 Responsible Mineral Sourcing (applicable only to Facilities that engage in, or plan to engage in, sourcing and processing of minerals or metals)	
Towards Good Practice	• Clarify 'OECD-aligned' with definitive list of relevant schemes and frameworks. • Clarify mined materials and relevance to mineral concentrates; clarify if transporting mined material refers only to mineral inputs or also produced output.
Good Practice	• Consider exemptions to avoid duplicated audits, such as for smelters supplying into refineries where the refiner has already completed a third-party OECD-aligned audit. • Address situations where independent audits can be limited in scope or outright blocked by geopolitical and legal barriers. • Suggestions for audits to be risk-based and triggered by reg flags. • Suggestion for public disclosure of audit reports to be voluntary with focus on summary statements. • Change record retention requirement to 5 years with an option for 10 years when required by law.
Leading Practice	• Due diligence on recycled materials is included in OECD Mineral Guidance supplement on gold and therefore should be at the Good Practice level. • Several comments on the scope of applicability, referencing traded materials, and third-party sourced materials.

Note:
OECD = Organisation for Economic Co-operation and Development

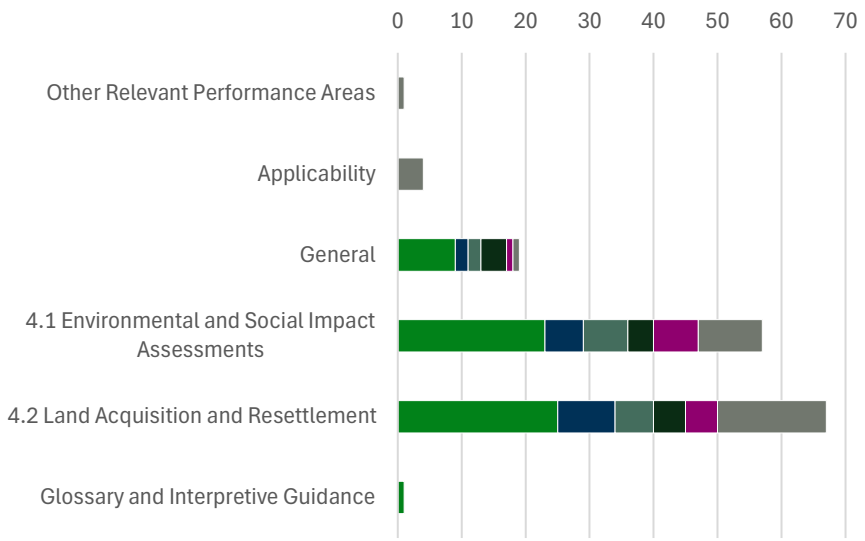
6.4.6 PERFORMANCE AREA 4: New Projects, Expansions, and Resettlement

Intent *(as stated in the draft Standard)*
Assess environmental and social risks and impacts of new projects and significant changes to existing operations. Develop management plans in consultation with affected stakeholders and rights-holders to avoid or minimise harm to people and the environment. Avoid involuntary physical or economic displacement wherever possible. Where it is unavoidable, apply the mitigation hierarchy and engage affected stakeholders and rights-holders to limit adverse impacts and restore or improve the livelihoods and living standards of those affected.

149 total comments	**43 respondents**	**2 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	58
Investor	17
Downstream industry	15
Midstream industry	13
Consultancy	13
All other types	13

Number of Comments on Performance Area Sections



Feedback Summary

- Comments indicate a tension between alignment with International Finance Corporation Performance Standards (IFC PS) / Equator Principles as minimum expectations for Environmental and Social Impact Assessments (ESIAs) and meeting jurisdictional requirements, with many nongovernmental organisations (NGOs) favouring the former. Upstream Industry highlights the potential for conflict or confusion with regulatory requirements.
- Some stakeholders noted concern that Performance Area 4 applies to only one assurance cycle, reducing incentives to pursue full compliance.
- Feedback includes multiple requests to move some Requirements from Good Practice to Towards Good Practice in Sections 4.1 and 4.2.
- Comments require a Resettlement Action Plan and/or Livelihood Restoration Plan in Towards Good Practice.
- There are requests to define 'significant adverse impacts', and 'significant changes', and to introduce further principle-based guidance or explicit materiality thresholds to determine when Performance Area 4 applies to expansions or modifications.
- Comments request further guidance on, or requirements related to, legacy resettlement, or how companies should address inherited resettlement issues when acquiring assets.
- Some comments request the inclusion of more specific language on gender-responsive baselines, considerations in mitigation, compensation and restoration, and gender-based violence safeguards.
- In Section 4.2, multiple comments recommend removing explicit references to IFC PS5 and PS7 to prevent confusion and overlapping requirements.
- Some comments request allowances for summaries and redacted disclosure to protect sensitive or confidential information.

TABLE 6-13 DETAILED FEEDBACK BY SECTION: SECTION 4.1

4.1 Environmental and Social Impact Assessments	
Towards Good Practice	• Some upstream stakeholders suggest that alignment to International Finance Corporation Performance Standard (IFC PS) 1 as Towards Good Practice may be too stringent, while others are concerned that it would create duplicative efforts when a jurisdictional Environmental and Social Impact Assessment (ESIA) is required. • Further guidance is needed around which countries are considered to have 'jurisdictional regulations'. • Midstream and downstream industry, investors, nongovernmental organisation/civil society organisation (NGO/CSO) stakeholders favour the application of IFC PS to promote consistency and stronger safeguards. • Consistency is needed in expectations across environmental and social resources; level of detailed guidance should be consistent. • Deep-sea tailings disposal and deep seabed mining activities are not covered by the Performance Area as written.

4.1 Environmental and Social Impact Assessments	
Good Practice	• Requirement 1: Provide further guidance on documentation required to demonstrate alignment. • Cumulative Impact Analysis and Management Plans should be moved to Towards Good Practice. • Specify improvement opportunities (e.g., environmental benefits, innovation) alongside mitigation of adverse impacts.
Leading Practice	• Clarify that participatory monitoring is context-dependent and not appropriate across all resources or plans. • Requirement 1: Move to Good Practice. • Provide further guidance and definition for 'fully participate' or replace with an alternative word that is auditable.

TABLE 6-14 DETAILED FEEDBACK BY SECTION: SECTION 4.2

4.2 Land Acquisition and Resettlement	
Towards Good Practice	• Strengthen Requirement 1; use of 'wherever possible' lacks robustness and connection to the mitigation hierarchy. • Requirement for a Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) should be included in Towards Good Practice. • Strengthen the connection between stakeholder consultation and the desired outcomes of consultation in the process; clarify whether this section purposefully uses 'consult' and not 'meaningful engagement' as used elsewhere in the Standard. • Requirement 3: Should focus on jurisdictional requirements/laws and alignment to International Finance Corporation Performance Standard (IFC PS) 7; move to Good Practice. • Some stakeholders suggested that references to IFC PS7 create a potential conflict of requirements. • Provide clarity on best practices when relocation is unavoidable but agreement through free, prior, and informed consent (FPIC) has not been achieved. • Include a requirement to ensure voluntary displacement is managed ethically and transparently.
Good Practice	• Move requirements 1, 2, 3, and 6 to Towards Good Practice. • Remove 'if applicable' from Requirement 1, as it implies that livelihood restoration is optional. • Requirement 3: Rephrase to reinforce distinction between mitigation and compensation, and that compensation must be sufficient to restore or improve livelihoods and standards of living. • Requirement 4: Clarify applicability and terminology used. • Requirement 8: Stipulate requirement for engagement with Project Affected Populations (PAPs) and establishing temporal parameters around monitoring.
Leading Practice	• Include reference to defined timeframes to address gaps identified in monitoring.

6.4.7 PERFORMANCE AREA 5: Human Rights

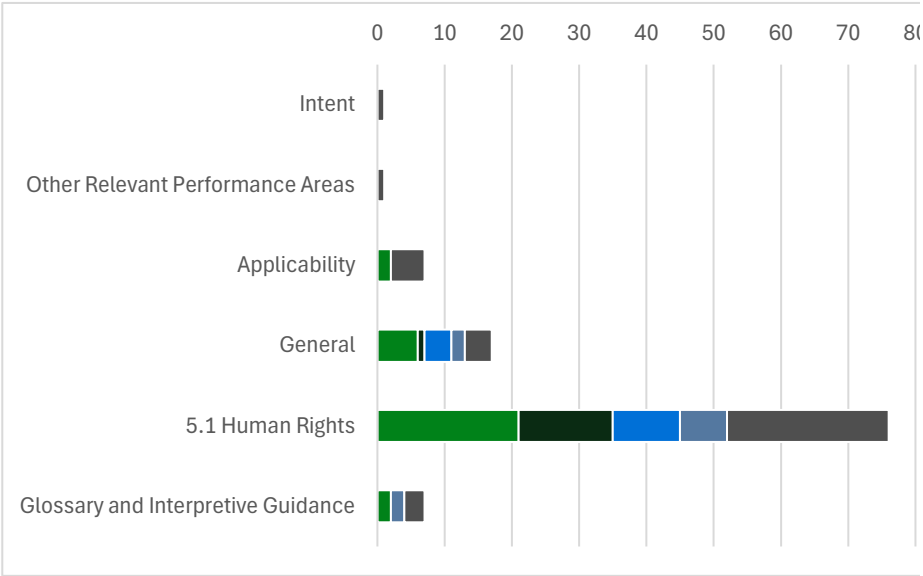
Intent *(as stated in the draft Standard)*
Respect human rights by implementing human rights due diligence management systems and approaches for the effective identification, prevention, mitigation and remedy of human rights risks and impacts aligned with the United Nations Guiding Principles (UNGPs) on Business and Human Rights.

109 total comments	**41 respondents**	**1 Performance Area section**

Top 4 Stakeholder Groups Providing Comments

Upstream industry	31
Midstream industry	15
NGO/CSO	14
Intergovernmental/ multi-lateral organisation	11
All other types	38

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Establish a single-process, multi-evidence principle to meet similar requirements across multiple performance areas through one integrated approach, such as referring to other Performance Areas instead of requiring parallel requirements to prevent ambiguity over assurance and resource-intensive multiple documentation burdens.
- Require corporate adoption, internal resources, and board oversight for human rights policies and due diligence.
- Require a zero-tolerance approach towards attacks on human rights defenders by both companies and their business partners.
- Incorporate reference to women throughout the practice levels.
- Conflicting feedback over levels of applicability, training, stakeholder engagement, and frequency of requirements.
- Provide further guidance on scope and content of human rights policies; implementation of risk assessments and due diligence; minimum levels of disclosure and due diligence required across supply chains and business relationships; how companies should interact with government authorities who contribute to human rights risks.

TABLE 6-15 DETAILED FEEDBACK BY SECTION: SECTION 5.1

5.1 Human Rights	
Towards Good Practice	• Require human rights due diligence for all projects throughout the life of the projects, and not just at project outset. • Require engagement with stakeholders and rights-holders. • References to vulnerable groups and human rights defenders should be at the Good Practice level. • Requirement 1: Clarify that the human rights policy is required at a corporate level and endorsed by the board but extend the applicability of the policy and risk assessments to the facility's value chain. • Requirement 2: Clarify method and frequency of human rights risk assessments. • Requirement 3: Require facilities to resolve grievances and provide for, or cooperate in, remedy for adversity; refer to all grievances, not just human rights and to whistleblower channels. • Requirement 4: Require human rights training for all leaders and employees.
Good Practice	• Requirements to provide remedy should be at the Towards Good Practice level. • Requirement 1: Move Human Rights Due Diligence (HRDD) aligned with United Nations Guiding Principles (UNGP) to Towards Good Practice level; establish a frequency for HRDD or make it ongoing. • Requirement 2: Require collaboration with affected communities in the enhancement of the grievance mechanism; remove the word 'enhance' to provide clarity. • Requirement 3: Reference limitations that apply to state-controlled entities in remediation actions; prioritise remedy impacts caused by the facility. • Requirement 4: Require public disclosure of timelines for assessing and responding to impacts. • Requirement 5: Internal review of effectiveness every three years is too ambitious at this level.
Leading Practice	• Explicitly reference engagement with industry, government, and nongovernmental organisations (NGOs). • Establish triggers for external monitoring if there is a failure to prevent or remediate impacts. • Move Requirements 1, 2, and 4 to Good Practice Level. • Requirement 2: Provide a frequency for the independent review of effectiveness. • Requirement 3: Reference limitations to collaboration with anti-mining human rights defenders. • Requirement 4: Refer to relevant employees, or relevant training. • Requirement 5: Clarify the term 'assist' as being the provision of guidance and tools, rather than direct implementation.
Glossary and Interpretive Guidance	• Reference core international human rights instruments as well as the UNGPs, e.g., Organisation for Economic Co-operation and Development (OECD) Guidelines, International Labour Organization (ILO) Standards; and guidance, e.g., Office of the United Nations High Commissioner for Human Rights (OHCHR), UNGP Reporting Framework. • Clarify the term 'defined intervals', e.g., minimum expectations, defined by companies and tailored to context. • Define key terms e.g., 'legitimate processes', 'sufficient information', 'adequacy', 'business relationships'. • Provide consistent use of terms across practice levels and performance areas e.g., risk vs. impact, collaborate vs. consult, real vs. actual impacts, significant vs. severe, control vs. leverage, remedy (different definitions appear across the Consolidated Mining Standard Initiative [CMSI]).

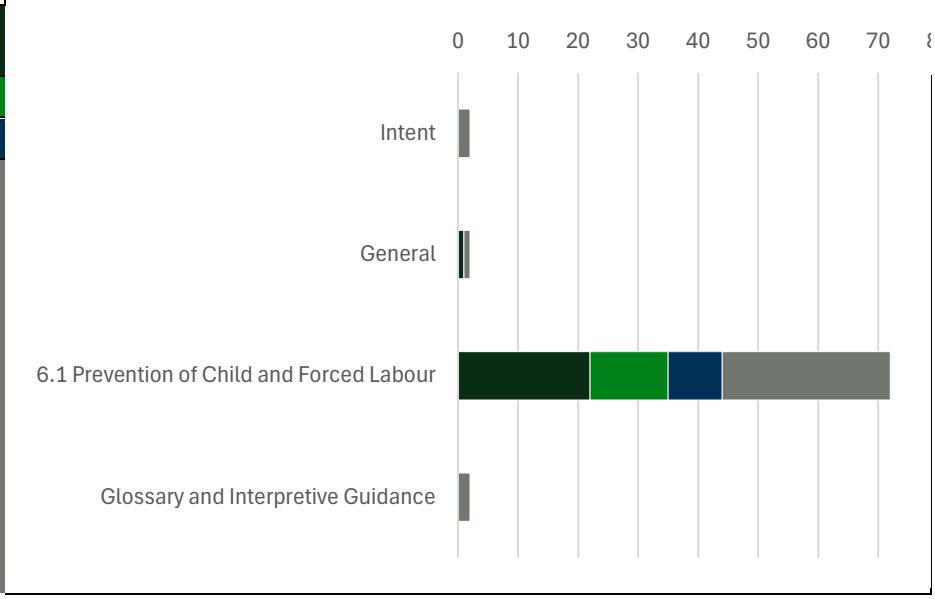
6.4.8 PERFORMANCE AREA 6: Child and Forced Labour

Intent *(as stated in the draft Standard)*
Consistent with the United Nations Guiding Principles (UNGPs), prohibit, prevent, mitigate and remedy instances of child and forced labour, including prohibiting the employment of children below the age of 15 and forced labour in any form and ensure that young workers below the age of 18 are not exposed to the worst forms of child labour, including hazardous work. These are aligned with International Labour Organization (ILO) Conventions 138, 182, 29, and 105.

78 total comments	**20 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Midstream industry	23
Upstream industry	13
Investor	9
All other types	33

Number of Comments on Performance Area Sections



Feedback Summary

- Situate this Performance Area within broader approaches to Human Rights Due Diligence (Performance Area 5) and responsible supply chain due diligence (Performance Area 3); extend the application of most requirements to the facility's value chain.
- Provide guidance on application in 'low-risk' jurisdictions that are deemed to have robust regulatory environments.
- Clarify the minimum expectations and frequency of most requirements.
- Limit references to external frameworks as they might be too onerous for junior companies or become outdated.

TABLE 6-16 DETAILED FEEDBACK BY SECTION: SECTION 6.1

6.1 Prevention of Child and Forced Labour	
Towards Good Practice	• Clarify minimum standards for actions to address identified instances at this level. • Clarify application of requirements at this level to the facility's value chain. • Add requirements to remedy identified instances and prohibit the presence of children at facilities. • Move Requirements 4, 7, and 8 to the Good Practice Level. • Requirement 3: Clarify the requirement methodology and frequency of risk assessments. • Requirement 5: Expand the requirement for training to community relations teams who interact with community leaders; provide a minimum frequency for employee training; move the alignment of training with the United Nations Guiding Principles (UNGPs) and International Labour Organization (ILO) from Towards Good Practice to Good Practice level. • Requirement 6: Acknowledge the presence of legislation in many jurisdictions that already prohibits withholding of identity documents. • Requirement 7: Combine with Requirement 2 to avoid repetition; move vulnerable group measures to Good Practice Level.
Good Practice	• Require regular training for personnel on workers' rights. • Requirement 1: Clarify if required mitigation measures also include monitoring; add preventive and accounting practices; require risk-based approach and application to partners. • Requirement 2: Require business partners to enforce practices. • Requirement 3: Consider combining 'Employer Pays Principle' requirement with Requirement 6 (prohibiting document withholding) at Towards Good Practice level. • Requirement 4: Move risk mitigation practices to the Towards Good Practice level. • Requirement 5: Distinguish the differences in response to instances that the facility has contributed to and those they are directly linked to. • Requirement 6: Remove the references to Global Reporting Initiative (GRI) and other external standards to avoid the risk of becoming outdated. • Requirement 7: Establish the frequency of internal effectiveness reviews; clarify if internal effectiveness reviews are triggered by identified instances; require implementation of corrective actions following reviews.
Leading Practice	• Move Requirements 1, 2, and 3 from the Leading Practice level to Good Practice. • Requirement 2: Define or replace the term 'remediation framework', as this is not referred to elsewhere. • Requirement 3: Establish the frequency of internal effectiveness reviews. • Requirement 4: Define expectations for training content, delivery, and leverage with uncooperative business partners.
Glossary and Interpretive Guidance	• Provide guidance on application to junior mining companies where requirements might be too onerous. • Provide guidance on addressing the presence of 'illegal mining'. • Align definitions with International Labour Organization (ILO) definitions e.g., child labour, and expand references to ILO Conventions and Covenants, and to the UN Convention on the Rights of the Child. • Consider removing references to 'modern slavery' as there is no internationally agreed legal definition.

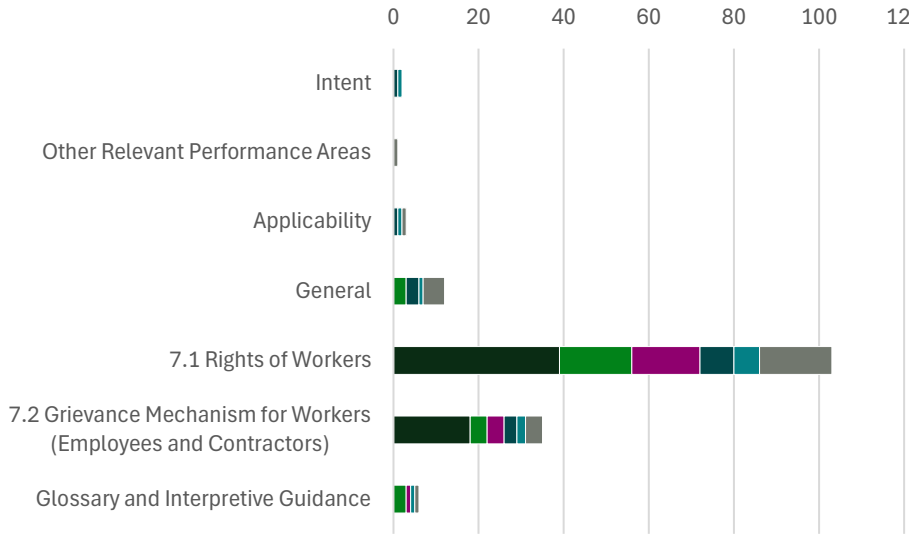
6.4.9 PERFORMANCE AREA 7: Rights of Workers

Intent *(as stated in the draft Standard)*
Respect workers' rights to fair and decent employment terms and their rights to freedom of association and collective bargaining. Prohibit, prevent, and remedy workplace discrimination and harassment and provide an effective mechanism to address worker grievances. These requirements are aligned with International Labour Organization (ILO) Conventions 1, 14, 87, 95, 98, 100, 131,132, 183, and 190.

162 total comments	**38 respondents**	**2 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments	
Midstream industry	57
Upstream industry	27
Consultancy	21
Industry/trade organisation	16
Intergovernmental/ multi-lateral organisation	12
All other types	29

Number of Comments on Performance Area Sections



Feedback Summary

- Clarify if and how national legislation and regulations can act as equivalencies for the requirements in this Performance Area and provide related guidance.
- Clarify that requirements regarding vulnerable and marginalised groups can be limited by, and should be aligned with, applicable laws in relevant jurisdictions.
- Clarify data privacy and protection requirements including access, transfer, retention, and removal.
- Include references to, and requirements regarding, workers with disabilities throughout.
- Establish one integrated approach to grievance management across the Consolidated Mining Standard Initiative (CMSI) to avoid repetition and duplication, particularly when considering assurance.
- Some conflicting feedback on whether this Performance Area could or should be applicable to contractors, instead of just focusing on employees.
- Some conflicting feedback on whether to include fair and/or living wages given variable methodologies and disproportionate impacts on smaller companies.
- Some conflicting feedback on whether there should be explicit references and requirements to women's rights, or to exclude these based on political sensitivities.

TABLE 6-17 DETAILED FEEDBACK BY SECTION: SECTION 7.1

7.1 Rights of Workers	
Towards Good Practice	• Include references to vulnerable groups at this level. • Requirement 2: Reframe from a focus on women to a focus on equal treatment and inclusion for all. • Requirement 3: Replace 'physical ability status' with 'disabled and neurodivergent' to be more inclusive and aligned; balance the need to respect workers' rights with the need for workers to meet minimum fitness requirements.
Good Practice	• Move Requirements 3, 10, 11, and 14 to the Towards Good Practice Level. • Requirement 1: Clarify the minimum requirements and review frequency for workers' rights assessments. • Requirement 2: Require gender-balanced worker representation bodies. • Requirement 4: Require public disclosure of worker remuneration reviews at the Good Practice level; include a gender pay gap analysis in the internal review of worker remuneration; balance the requirement for equal remuneration with the need to reward high performing workers based on merit. • Requirement 6: Include the need for rest, the needs of women, need for adequate food, clothing related to personal protective equipment (PPE), and applicability of requirement to guests to the facility. • Requirements 7, 8, and 9: Balance the precedence of applicable law with International Labour Organization (ILO) and other international requirements when setting total working hours, rest periods, and overtime, as these may differ or conflict, particularly in First In, First Out (FIFO) settings and with certain worker categories. • Requirement 11: Clarify how unionisation and freedom of association requirements will apply and be verified in jurisdictions where these are either protected or restricted by appliable laws. • Requirement 12: Clarify representatives' access to members in the workplace, as interference in production is limited. • Requirement 14: Provide criteria for or conditions and frequency of training. • Requirement 15: Identify the criteria for assessing the effectiveness of employment practices.
Leading Practice	• Requirements 1 and 2: Establish the frequency for conducting workers' rights assessments and effectiveness reviews of employment practices. • Requirements 3, 4 and 7: Move to the Towards Good Practice level. • Requirement 4: Recognise that the ability to publicly report gender wage ratios will vary by jurisdiction. • Requirement 5: Consider reframing, clarifying, or removing, as the specific social benefits requirements are particularly prescriptive and ambitious. • Requirement 7: Add cultural and religious rights.
Glossary and Interpretive Guidance	• Define key terms, e.g., 'decent terms', 'employment practices', and 'conditions of employment'. • Replace 'other categories' of vulnerable groups with 'other status'. • Clarify if this Performance Area applies to remote workers. • Provide guidance on offering development opportunities and setting employment targets for women in diverse contexts.

TABLE 6-18 DETAILED FEEDBACK BY SECTION: SECTION 7.2

7.2 Grievance Mechanism for Workers	
Towards Good Practice	• Restrict the focus at this level to the facility's grievance process, and not on external mechanisms. • Requirement 2: Explicitly require application of grievance mechanisms to contractors as well as employees; include reference to whistleblower channels.
Good Practice	• Requirement 1: Include 'available support' in the items to be outlined when consulting workers; replace 'consult' with 'Request input from' regarding the design of the grievance mechanism, as consultation should be at the Leading Practice level. • Requirements 2 and 4: Establish the frequency for engaging workers and providing updates. • Requirement 6: Require protection of confidentiality when sharing updates. • Requirement 5: Include 'policy reforms' in the actions that could be taken in response to grievances. • Requirement 7: Include reference to channels for vulnerable groups when identifying alternative redress avenues.
Leading Practice	• Apply a trauma-centred approach to grievance management. • Requirement 1: Include reference to protection of privacy when sharing data. • Requirement 2: Change from co-designing mechanisms to requesting input from workers to avoid bureaucratic processes. • Requirement 3: Establish the frequency of the effectiveness reviews.
Glossary and Interpretive Guidance	• Provide consistent use of language across performance areas when addressing protection of privacy as this varies across the Consolidated Mining Standard Initiative (CMSI). • Provide guidance on how to address conflicts when national legislation treats internal and external workers differently. • Provide consistent definition of terms across practice levels and performance areas (e.g., collaborate vs. consult).

6.4.10 PERFORMANCE AREA 8: DIVERSITY, EQUITY, AND INCLUSION

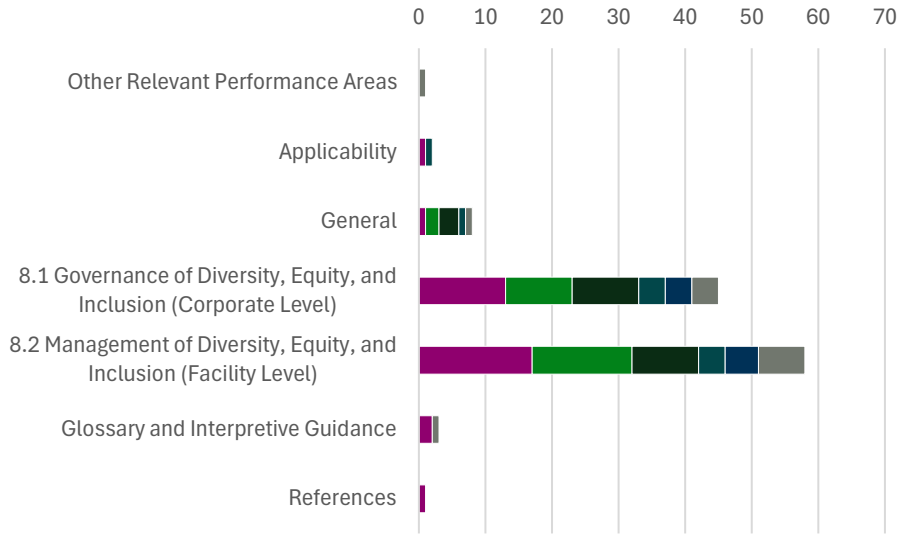
Intent *(as stated in the draft Standard)*
Implement strategies, initiatives, and processes to promote diversity, equity, and inclusion in the workplace to foster creative and diverse perspectives and enhance positive culture in the workplace.

118 total comments	**26 respondents**	**2 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments

Consultancy	35
Upstream industry	27
Midstream industry	23
Industry/trade organisation	10
Investor	9
All other types	14

Number of Comments on Performance Area Sections



Feedback Summary

- Provide additional guidance on setting objectives or targets for diversity, equity, and inclusion (DEI) representation among corporate leadership, whether process/structural targets are allowed and whether qualitative measures that demonstrate commitment are acceptable.
- Clarify public disclosure of an independent review of DEI given concern that public reports may create privacy or legal issues for companies.
- Sharing internal reviews publicly, as required in Section 8.2, Leading Practice Requirement 4, may expose sensitive workforce data and may limit the effectiveness of any internal review.

TABLE 6-19 DETAILED FEEDBACK BY SECTION: SECTION 8.1

8.1 Governance of Diversity, Equity and Inclusion (Corporate Level)	
Towards Good Practice	• Requirement 3: Combine with Good Practice Requirement 1; change '…to improve diversity, equity, and inclusion (DEI) across the company's operations' to '…to improve DEI across all levels of the company'.
Good Practice	• Provide examples of how DEI is integrated into governance and business processes (e.g., benefits, career development, etc.). • Requirement 1: Specify what should be included in strategy, such as gender and Indigenous Peoples targets or company-based needs. • Requirement 2: Move to Towards Good Practice Level or change to first Requirement at Good Practice Level for clarity. • Combine Requirements 4 and 8.
Leading Practice	• Requirement 1: Provide further clarity on what should be included in the review and what should be disclosed (summary, key findings, fully report) to prevent inconsistent application of the Requirement. • Requirement 3: Change to board approval of DEI strategy; move board awareness of DEI strategy to Good Practice.
Glossary and Interpretive Guidance	• Add relevant UN instruments such as International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and Convention on the Rights of Persons with Disabilities (CRPD). • It is unclear how Performance Area 20, Climate Action, is related to this topic.

TABLE 6-20 DETAILED FEEDBACK BY SECTION: SECTION 8.2

8.2 Management of Diversity, Equity, and Inclusion (Facility Level)	
Towards Good Practice	• Requirement 4: Provide additional guidance on how to define a preliminary scope and develop methods for data collection to enable consistent implementation. • Requirement 5: Provide additional guidance on diversity metrics and how the baseline should be used.
Good Practice	• Requirement 3: Clarify review cadence and minimum standards; consider rephasing to 'Conduct a review of infrastructure to identify, prioritise, and implement processes to resolve barriers to digital and physical inclusion and accessibility'. • Requirement 9: Provide additional guidance on how to disclose diversity metrics where jurisdictional requirements prevent collecting and disclosing information on race or ethnicity; Provide minimum guidance on what disclosure is expected, adding footnotes for Global Reporting Initiative (GRI) references around diversity indicators and aligning to the requirement to International Organization for Standardization (ISO) Standard 30415:2021.
Leading Practice	• Requirement 2: Change to corporate level; ISO 30415:2021 recommends 'active participation' in multi-stakeholder initiatives for organisations at a higher maturity level. • Requirements 3 and 4: Add footnotes referencing *GRI [Global Reporting Initiative] Disability Reporting in Sustainability, Inclusive Reporting: 2021.* • Requirement 4: Clarify a minimum frequency or specify one-time review.

6.4.11 PERFORMANCE AREA 9: SAFE, HEALTHY AND RESPECTFUL WORKPLACES

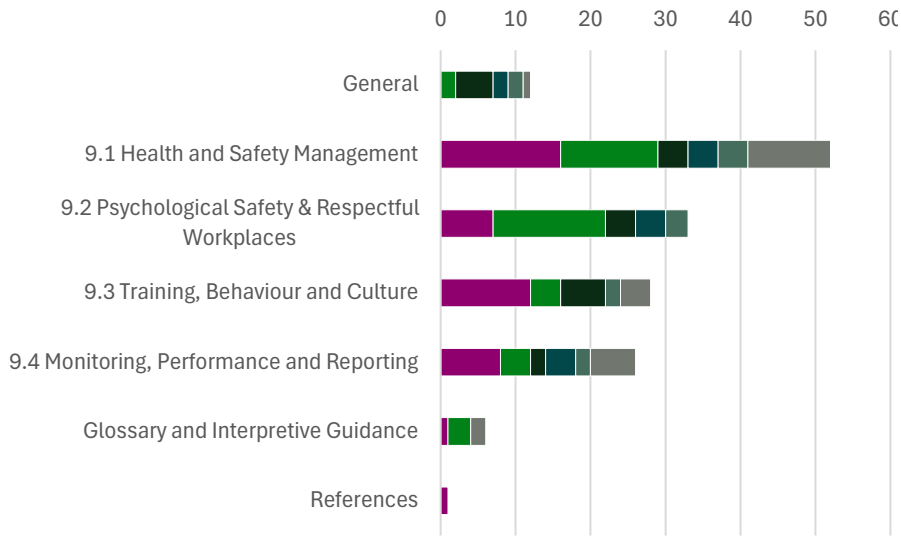
Intent *(as stated in the draft Standard)*
Protect, promote and sustain the physical and psychological health and safety of workers by implementing a system to prevent and mitigate health and safety risks, with the goal of eliminating fatalities, preventing occupational injuries, illness, and disease and to foster care and respect within a positive health and safety culture. These requirements are aligned with International Labour Organization (ILO) Conventions 155, 187 and 176.

158 total comments	**35 respondents**	**4 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments

Consultancy	45
Upstream industry	41
Midstream industry	21
Industry/ trade organisation	14
Downstream industry	13
All other types	24

Number of Comments on Performance Area Sections



Feedback Summary

- There are requests to consider additional requirements proposed in feedback to push continuous improvement and leading practice sections.
- Some requests are to provide considerations for geographies where implementation may be challenging or overlap with local requirements or may impact transparency or practicality of establishing useful performance objectives.
- Further clarity is needed on the topic of Psychological Safety; there are requests to clarify definitions and alignment with international standards such as International Organization for Standardization (ISO) Standard 45003; some comments request replacing 'psychological safety' (team climate) with 'psychosocial/psychological health and safety' (risk management).
- Some stakeholders suggest that the 'Leading Practice' requirements are not ambitious enough and should include elements that stretch organisations beyond current norms, such as third-party assurance, robust management systems, and continual improvement processes.
- Stakeholders suggest that the standard should go further to encourage open reporting, learning from incidents, and continuous improvement, rather than focusing on outcome-based metrics.
- Some industry stakeholders suggested removing specific topics such as diesel particulate matter, while others suggested including some, such as blasting and use of explosives.
- Some comments suggest specifying a common and standardised calculation method for measuring accidents to ensure comparability and clarity across reporting entities.
- There are requests to clarify guidance that comes from Towards Sustainable Mining (TSM) Safe, Healthy and Respectful Workplaces, and how such guidance will be transferred to Consolidated Mining Standard Initiative (CMSI); some request clarification if simplified approach will be used as available under TSM Health and Safety protocol.
- Some requests to clarify expected frequency for formal engagement with underrepresented groups; requests to provide guidance on engagement intervals.

TABLE 6-21 DETAILED FEEDBACK BY SECTION: SECTION 9.1

9.1 Health and Safety Management	
Towards Good Practice	• Requirement 6: Clarify access to medical facilities; ensure personal protective equipment (PPE) accounts for gender and provide guardrails around potential abuse of unlimited access to PPE. • Ensure anonymity and confidentiality of workers who report issues.
Good Practice	• Clarify minimum contents of the health and safety management system; concerns include competent managers, formal and informal training, equipment and machinery maintenance, reporting mechanisms. • Requirement 3: Move to Towards Good Practice as the requirement is a common legal requirement in jurisdictions; consider other underground risks or other common carcinogens at mine sites. • Expand near-miss of serious incidents and fatalities (SIFs) to include significant occupational illness and disease incidents; tracking against investigations should include monitoring of preventive actions and sharing lessons learned across the industry.

9.1 Health and Safety Management	
Leading Practice	• Consider consolidating requirements at Leading Practice and Good Practice levels • Provide further guidance on qualifications of the qualified hygienists; include phrasing that allows more flexibility of a qualified hygienist based on the local authority.
Glossary and Interpretive Guidance	• Include definition of medical facility • Clarify 'defined intervals' in the context of internal and independent reviews.

TABLE 6-22 DETAILED FEEDBACK BY SECTION: SECTION 9.2

9.2 Psychological Safety and Respectful Workplaces	
Towards Good Practice	• Consider moving psychological safety to within employee well-being initiatives, referencing disciplinary codes, good practice guidelines, and medical incapacity assessments.
Good Practice	• Requirement 2: Move to Section 9.1; provide additional guidance and metrics to allow benchmarking. • Clarify how to demonstrate development of trauma informed processes for reporting and response to incidents of disrespectful, psychologically unsafe, or harmful behaviour in the workplace. • Provide guidance and examples on developing and implementing programmes to support worker mental health.
Leading Practice	• Consider monitoring indicators without rigid targets, focusing on trend tracking and continuous process improvement to maintain transparency as setting corporate performance targets for psychological safety may discourage incident reporting. • Consider additional requirements at the Leading Practice level, including requirements for corporate culture or overall safety culture risks and assessments; and ensure that comprehensive programmes are in place for access to metal health support services.
Glossary and Interpretive Guidance	• Clarify definition of 'respectful' for auditability. • Provide examples of diverse perspectives or guidance on seeking these. • Provide guidance on how to provide evidence in auditing the effectiveness of psychological safety.

TABLE 6-23 DETAILED FEEDBACK BY SECTION: SECTION 9.3

9.3 Training, Behaviour and Culture	
Towards Good Practice	• Requirement 1: Clarify who would receive this training and whether it should be job/task specific training. • Include bystander training in the fundamentals of psychological safety and respectful behaviour training.
Good Practice	• Provide specific training topics to be covered in the training programme, rather than describing the framework of how the training programme is established and implemented.
Leading Practice	• Add a process to proactively review job functions and workflows to identify possible accommodations/modifications. • Clarify how leadership and workplace design can be evaluated in the workplace.
Glossary and Interpretive Guidance	• Mechanisms for the participation of 'Underrepresented' and 'marginalised groups' are unclear; clarify how this would be achieved in unionised environments.

TABLE 6-24 DETAILED FEEDBACK BY SECTION: SECTION 9.4

9.4 Monitoring, Performance and Reporting	
Towards Good Practice	• Link reporting of safety concerns to reference the grievance mechanism so it includes requirements of no retaliation in the case of reporting safety hazards or unsafe working conditions or practices.
Good Practice	• Requirement 5: Could limit transparency in reporting for fear of losing conformance status; what constitutes a workplace fatality may vary by jurisdiction; conflicting feedback on whether move to Towards Good Practice or Leading Practice.
Leading Practice	• Requirements under Leading Practice may be difficult to obtain for newly acquired operations; consider a phased approach. • Concerns raised over how the continual improvement in performance targets can have an overall negative impact if they discourage transparent reporting.
Glossary and Interpretive Guidance	• The inclusion of ergonomics and psychosocial risks is considered too broad. Define Lagging and Leading indicators and terms like injuries, illness, and disease. • Clarify if frequency of reviews should be linked to risk. • Clarify 'independent review' as it replaces the previously used term 'audit' which implies a more structured and detailed process.

6.4.12 PERFORMANCE AREA 10: EMERGENCY PREPAREDNESS AND RESPONSE

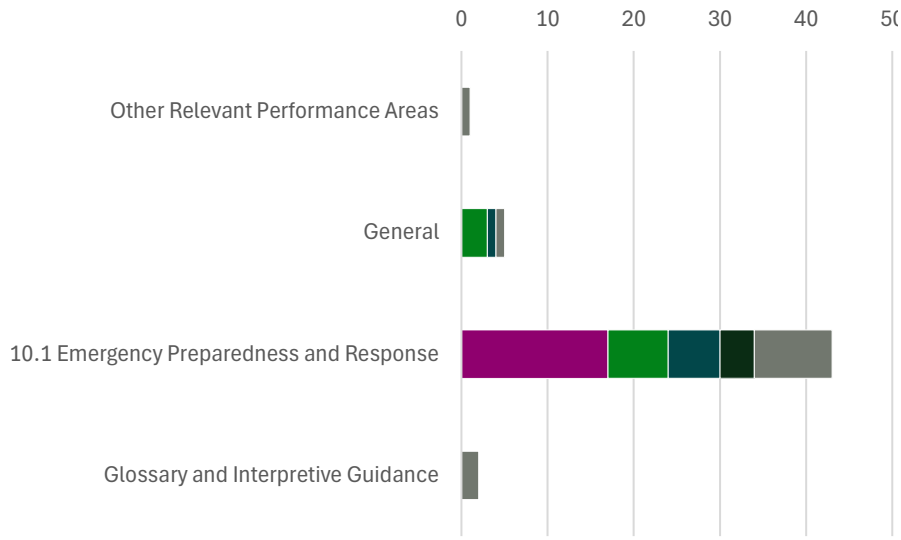
Intent *(as stated in the draft Standard)*
Protect the health and safety of workers and those at risk, including communities and the environment in the event of an emergency, by implementing a system to manage emergency responses.

51 total comments	**22 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments

Consultancy	17
Upstream industry	10
Industry/ trade organisation	7
Midstream industry	4
All other types	13

Number of Comments on Performance Area Sections



Feedback Summary

- Clarify the use of the term 'familarise' when new members are onboarded to the emergency or crisis response teams as it is confusing: If it means 'fully trained' it does not instill confidence in the rigour of the training required; if it does not mean full training, clarify that full training is still required.
- In the 'Good Practice' section, requirement 6 is difficult to meet and verify. The suggestion is to remove requirement 6 from the document. The requirement to 'provide information in an accessible, understandable, and appropriate manner to affected communities during an emergency or crisis' could be added to the Emergency Preparedness and Response Plan (EPRP) requirements.
- Consider additional references to Section 1.5 outside of the applicability section of the document to promote awareness of the Corporate Crisis Management Requirements; some feedback focused on connections between emergency preparedness and crisis management.

TABLE 6-25 DETAILED FEEDBACK BY SECTION: SECTION 10.1

10.1 Emergency Preparedness and Response	
Towards Good Practice	• Add a requirement to establish communication and notification mechanisms in this section prior to the requirement to test the systems in the Good Practice Level. • Completing all the training in two months may not be practical for complex emergency response roles.
Good Practice	• Requirement 2: Clarify if full drill is required to test the notification mechanisms that activate emergency and crisis response teams. • Requirement 4: Current phrasing implies a dedicated space existing solely as a control centre; instead, requirement should establish a location to be used in the event of an emergency or crisis. • Requirement 5: Establish threshold of when to engage potentially affected communities as all emergencies may not be applicable to surrounding communities. • Requirement 8: Clarify who the 'change of personnel' refers to (e.g., mine personnel or senior members of the local first responders).
Leading Practice	• Add a requirement to include community recovery plans and ensure commitments are made by companies to participate in the remedy/ recovery of communities. Requirements to participate and support the remediation and recovery from an emergency are absent from the Performance Area.
Glossary and Interpretive Guidance	• Suggestion to add United Nations Environment Programme (UNEP) Awareness and Preparedness for Emergencies at the Local Level (APELL) guidance document to the reference documents.

6.4.13 PERFORMANCE AREA 11: SECURITY MANAGEMENT

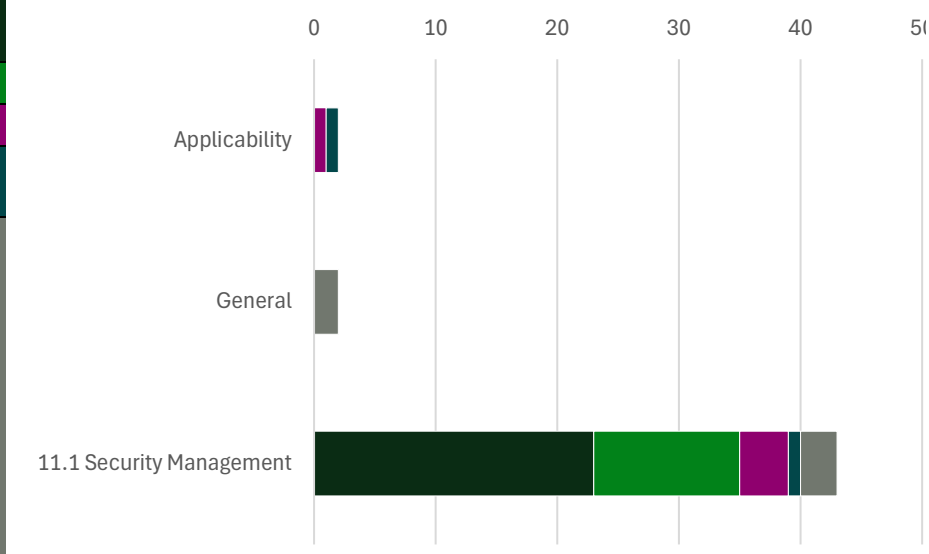
Intent *(as stated in the draft Standard)*
Implement the Voluntary Principles on Security and Human Rights to identify, prevent and mitigate human rights risks and remedy human rights impacts associated with the provision of security at the Facility.

47 total comments	**15 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments

Midstream industry	23
Upstream industry	12
Consultancy	5
Industry/ trade organisation	2
All other types	5

Number of Comments on Performance Area Sections



Feedback Summary

- Voluntary Principles on Security and Human Rights (VPSHR) is a major cross-cutting theme; commenters agree with alignment to VPSHR but note requirements should not oblige companies to become members.
- Comments suggest clarification on the integration with existing risk assessment frameworks, including whether security risk assessments can be part of human rights risk assessments (related to Performance Area 5).
- Training requirements are broadly supported, but stakeholders suggest emphasis on competency-based training, inclusion of cultural-specific content, and clarity on whether training must be provided directly by the facility or whether it can be delivered by contracted security providers.
- Comments suggest that integrating or clarifying overlap with Human Rights Due Diligence requirements (Performance Area 5) and access to remedy (Performance Area 17) should be considered.

TABLE 6-26 DETAILED FEEDBACK BY SECTION: SECTION 11.1

11.1 Security Management	
Towards Good Practice	• Requirement 1: Clarify commitment to implement the Voluntary Principles on Security and Human Rights (VPSHR) does not imply VPSHR membership. • Requirement 2: Clarify if a security risk assessment may form part of a human rights risk assessment to avoid duplicative processes or placing unnecessary burden on facilities operating in low-risk contexts. • Requirement 5: Clarify that public disclosure does not include sensitive security information to avoid operational risk (e.g., explosives, gold shipments).
Good Practice	• Clarify what constitutes public communication versus public disclosure of security-related commitments, and whether disclosure is appropriate in sensitive jurisdictions. • Requirement 7: Training should be competency-based, culturally specific, and recognise that in some cases security providers deliver training rather than facilities. • Requirement 8: Clarify why provider capacity-building is framed around compliance with the International Code of Conduct (ICC) for Private Security, rather than being aligned with the VPSHR, which is the primary standard reference elsewhere. • Comments on disclosure and remedy emphasise jurisdictional limits, particularly where internal grievance or remedy mechanisms could be construed as obstructing judicial processes.
Leading Practice	• Requirement 1: May be too broad; specify acceptable joint engagement activities (e.g., policing or community forms). • Requirement 2: Respondents caution that establishment of agreements with public security providers is outside operational control. • Requirement 4: Requiring implementation of the ICC may not be legally or operationally possible in all contexts. • Suggestions include enhancing requirements to emphasise ensuring—not only requiring—security providers' participation in training, including external monitoring in high-risk contexts.
Applicability	• Clarify how a facility can demonstrate the absence of human rights risks associated with security arrangements.
Glossary and Interpretive Guidance	• Clarify definitions of ability, appropriate, and public commitment to support preparation for audits.

6.4.14 PERFORMANCE AREA 12: ENGAGEMENT

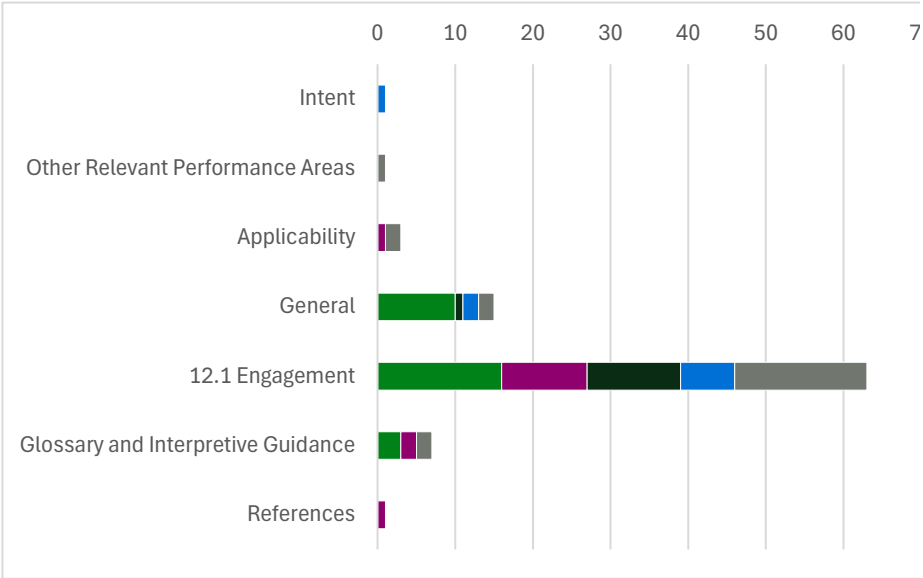
Intent *(as stated in the draft Standard)*
Implement an inclusive and effective engagement process to enable early and ongoing participation of Facility-level stakeholders and rights-holders in decisions and activities that affect them.

91 total comments	**31 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments

Upstream industry	29
Consultancy	15
Midstream industry	13
NGO/CSO	10
All other types	24

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Revise definition of, and standardize, terms such as stakeholders; rights-holders; and vulnerable, marginalised, and underrepresented groups across Performance Area and Standard; terms such as 'meaningful', 'local', 'timely', and 'where appropriate' are ambiguous.
- Consider scaling definition of 'stakeholders' and 'meaningful engagement' across either the Practice Levels or phases of asset development/mine life.
- Emphasise relevant, inclusive, culturally appropriate, and proportionate engagement over procedural activities.
- Clarify 'co-design' and 'joint decision-making' to manage potential implication of shared authority or veto rights with communities.
- Ensure meaningful engagement reflects community's terms, with communities having the ability to not engage with or suspend processes and for companies to pause activities until mutual agreement has been reached to proceed.
- Add language acknowledging the need to manage expectations, maintain confidentiality, and comply with local and statutory requirements, yielding to local laws and statutory requirements where there may be conflicts to avoid redundancy.
- Explicitly state consent is generally not a requirement for non-Indigenous communities.
- Requirements at Good Practice and Leading Practice levels may be at a relatively high standard for achievement.
- Consider practicality and auditability in relation to stakeholders who are not interested in or available to participate in engagement.
- Include Performance Areas 11 and 19 as Other Relevant Performance Areas.

TABLE 6-27 DETAILED FEEDBACK BY SECTION: SECTION 12.1

12.1 Engagement	
Towards Good Practice	• Provide further specificity on processes, including identifying and mapping stakeholders and systematic communication to facilitate consistent application. • Specify the need for culturally appropriate engagement and engagement with informal leaders, women, and underrepresented and Indigenous groups. • Make the establishment and maintenance of commitments register a stand-alone requirement. • Clarify that the commitments register should focus on those that are significant and of interest to stakeholders.

12.1 Engagement	
Good Practice	• Reorder requirements to reflect practical sequence of execution. • Engagement plans should clarify the project phase for which they are developed and barriers to participation should be addressed 'wherever possible' as well as acknowledge that some matters may be beyond the organisation's control. • Engagement plans should include 'participation access plans' identifying barriers to participation, consultation on how to overcome barriers, and mitigation measures to ensure participation of vulnerable, marginalised, and underrepresented groups. • Specify a minimum interval for reviewing feedback from engagement activities. • Requirement 4: Specify the audience for the training and its intended purpose; define 'where appropriate'. • Clarify how auditors will assess quality and inclusiveness of engagement processes.
Leading Practice	• Requirement 1: Conflicting comments regarding co-design and/or joint decision-making; one states Requirement is too onerous, while another feels it should be part of Good Practice; clarify Requirement to provide guidance on types of activities and when this engagement should take place. • Conflicting comments on engagement related to matters beyond direct impacts: One suggests moving to Good Practice, while others seek clarity on what topics would be included in this engagement and have concern it will lead to stakeholder fatigue. • Requirement 3: Conflicting comments, one noting that it should be expected at Good Practice Level while another states it is a very high expectation; suggestion to add measure of changes in community sentiment. • Clarify scopes and frequency of engagement required at Leading Practice Level. • Add a 'stretch target' of inclusion of Indigenous communities on boards to facilitate direct participation in decisions.
Glossary and Interpretive Guidance	• Meaningful engagement: Include women in lists of diverse and vulnerable/marginalised groups. • Rights-holders: Include individuals or groups 'with recognised legal rights or legally protected interests which may be adversely affected or have direct interest in the project'. • Vulnerable and underrepresented stakeholders and rights-holders: suggestion to replace 'vulnerable' with 'historically marginalised' and add 'neurodivergent and disabled' for emphasis.

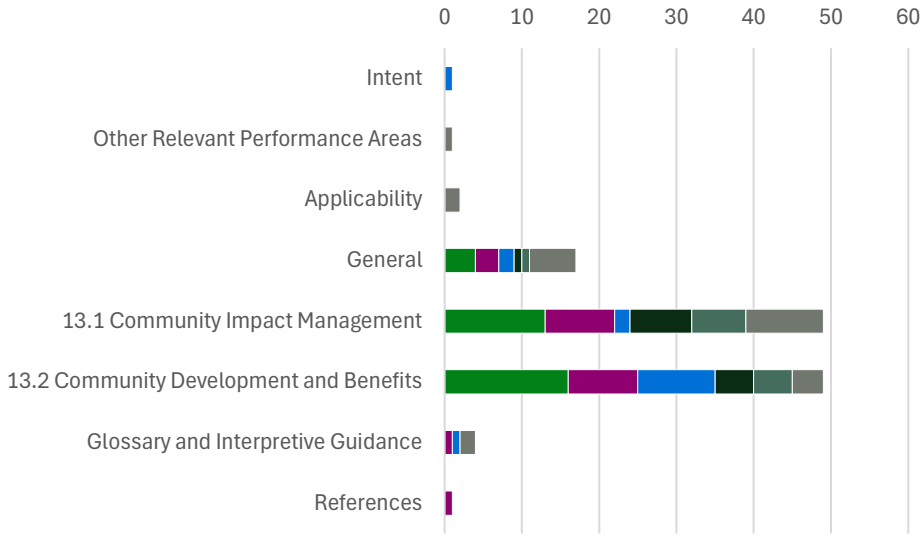
6.4.15 PERFORMANCE AREA 13: COMMUNITY IMPACTS AND BENEFITS

Intent *(as stated in the draft Standard)*
In collaboration with communities, identify community impacts, develop management plans to avoid or minimise harm to people and the environment and contribute to lasting economic and social well-being of affected communities.

124 total comments	**40 respondents**	**2 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	33
Consultancy	23
NGO/CSO	16
Midstream industry	14
Downstream industry	13
All other types	25

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Add reference to regulatory or legal requirements for impact mitigation (e.g., licensing and permitting mitigation obligations), benefit sharing (e.g., Community Benefit Agreements), or reporting and disclosure.
- Include language to maintain confidential information, privacy, and respect for stakeholder rights in all reporting and disclosure requirements.
- Clarify definitions of, and consider reducing variety of, terms utilised, regarding: 'appropriate', 'stakeholders' vs. 'rights-holders', 'consultation' vs. 'meaningful engagement' vs. 'participation' vs. 'collaborate' vs. 'engage;' add 'neurodivergent' to 'vulnerable and underrepresented'.
- Place stronger emphasis on accountability and inclusivity.
- Scale expectations to phase of asset/project development to account for resource implications and liability.
- Establish minimum expectations regarding timing and frequency of engagement, monitoring, and progress review activities.
- Include stakeholders in governance of mitigations implemented and stronger emphasis placed on collaboration and coordination with local and regional authorities to position company as a strategic partner and not a substitute for government; add language to remove responsibility for cumulative impact mitigation from the company.
- Include Performance Area 8 in Other Relevant Performance Areas.

TABLE 6-28 DETAILED FEEDBACK BY SECTION: SECTION 13.1

13.1 Community Impact Management	
Towards Good Practice	• Requirement 1: Conflicting feedback as to whether Requirement is too low of a bar or should be moved to Leading Practice; specify regular consultation and direct and indirect impacts. • Requirement 3: Define a frequency for monitoring, including acknowledgement of difficulty in accessing remote operations, particularly during cold seasons.
Good Practice	• Requirement 2: Ensure participation of women, and vulnerable and underrepresented stakeholders. • Requirement 4: Require public disclosure of monitoring progress and action plan effectiveness; add corrective action to this requirement; move portion reading 'monitoring activities should take into account how women, and vulnerable and underrepresented stakeholders and rights-holders can be uniquely and/or disproportionately affected' to Leading Practice. • Add requirement to facilitate local participation in the Facility's activities as practical and economically feasible.

13.1 Community Impact Management	
Leading Practice	• Requirement 1: Specify which action plans are to be jointly monitored; should be limited to significant elements of action plans. • Requirement 2: Review of effectiveness of action plans should be completed by independent party; clarify what the action plans are for. • Requirement 3: Clarify advance notice for closure planning for adequate planning and transition time; clarify whose capacity needs to be strengthened; clarify what practical compliance with this requirement look like. • Requirement 4: Conflicting feedback on whether requirement is challenging or should be moved to Towards Good Practice level. • Clarify or replace 'fully' regarding participation to define a level of assurance which is practical and achievable. • Provide guidance on how to define or demonstrate effectiveness.

TABLE 6-29 DETAILED FEEDBACK BY SECTION: SECTION 13.2

13.2 Community Development and Benefits	
Towards Good Practice	• Requirement 1: Add 'financially and otherwise' after 'contribute'. • Requirement 2: Move to Section 13.1. • Requirement 3: Clarify what monitoring of progress is referring to. • Requirement 4: Clarify how employment opportunities should be 'dignified' by providing a fair income, fair treatment, respect, and security. • Requirement 6: Move to Good Practice; include implementation of the plan.
Good Practice	• Requirement 1: Move to Towards Good Practice; include consideration of existing local, regional, and/or national government development plans where they exist. • Requirement 2: Combine or differentiate from Towards Good Practice Requirement 6. • Requirement 4: Include stakeholders in plan development; expand to encourage suppliers/vendors/manufacturers to establish local presence; specifically note inclusion of Indigenous communities. • Requirement 7: Rephrase to add flexibility by beginning with 'If deemed favourable'; add 'and operational opportunities and needs, and social, economic, and territorial context where activities will occur' after 'priorities'. • Requirement 9: Require data to be disaggregated across different categories of suppliers, employee demographics, etc.; prescribe categories of suppliers and employees; provide a minimum disclosure template or framework.
Leading Practice	• Requirement 1: Differentiate between 'Consult' at Towards Good Practice, 'Engage' for Good Practice, and 'Collaborate' for Leading; move to Good Practice. • Requirement 2: Move to Good Practice. • Requirement 5: Add 'where appropriate'.
Glossary and Interpretive Guidance	• Add definition of 'benefits' or 'benefit sharing' including need for fairness and equity and consideration of co-ownership and co-equity mechanisms. • Add definition for 'community resiliency' • Add concept of 'local institutions' to glossary to acknowledge complexities in partnerships and anti-corruption considerations • Provide methodology or guidance on how to define 'local' and 'area of influence' including consideration of existing legal frameworks, and how the definition will be audited.
Applicability	• Clarify level of the organisation to which the Performance Areas apply (corporate or facility level).

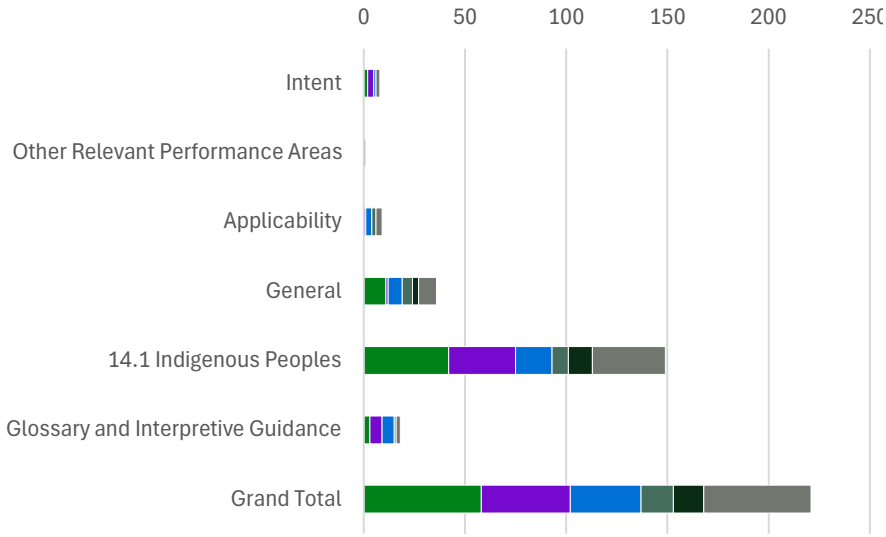
6.4.16 PERFORMANCE AREA 14: Indigenous Peoples

Intent *(as stated in the draft Standard)*
Respect Indigenous Peoples' individual and collective rights as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Develop inclusive, culturally appropriate and ongoing engagement processes and conduct Human Rights Due Diligence, in alignment with the United Nations Guiding Principles (UNGPs) on Business and Human Rights. Obtain agreement with affected Indigenous Peoples through a process demonstrating free, prior, and informed consent (FPIC) to anticipated impacts on their lands, territories, or other rights.

221 total comments	**52 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	58
Indigenous peoples/ organisation	44
NGO/CSO	35
Downstream industry	16
Midstream industry	15
All other types	53

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Feedback notes revised Performance Area is stronger and includes welcome improvements.
- Comments suggest a review of feedback related to free, prior, and informed consent (FPIC); some respondents (particularly Initial Public Offerings [IPOs] and nongovernmental organisations [NGOs]) note that the Performance Area treats FPIC as a procedure and not as a binding right; add specific consent with the right to give, withhold, or withdraw at any time—especially for relocation and critical cultural heritage.
- In contrast, other stakeholders (particularly Upstream Industry) express concern about conflicting requirements between the Performance Area and the State-led Consultation process; jurisdictional alignment should be prioritised with entities potentially seeking FPIC; provide clarity that FPIC is not a veto; provide more specificity for situations where FPIC is not achieved or where Indigenous Peoples decline to enter negotiations.
- Comments request the addition of explicit operational consequences (e.g., pause/stop consent-dependent activities and pause claims when FPIC is absent or withdrawn).
- Clarification of how FPIC requirements interact with national laws and State-led processes, avoiding duplication while safeguarding rights are upheld even where domestic frameworks fall short is requested.
- Comments request the inclusion of identification of affected Indigenous Peoples through self-identification and Indigenous governance systems, not solely State registries; Provide further guidance for expectations where Indigenous Peoples are not formally recognised in national legislation.
- Explicit measures have been requested to make sure Indigenous women, youth, elders, and defenders can participate safely in engagement, with culturally appropriate engagement, gender-based violence prevention, non-retaliation commitments, and confidential grievance channels.
- There are requests to provide clearer expectations on capacity support for Indigenous Peoples, including funding for independent advisers, translation, logistics, and technical expertise, delivered through independent or jointly managed mechanisms.

TABLE 6-30 DETAILED FEEDBACK BY SECTION: SECTION 14.1

14.1 Section	
Towards Good Practice	• Requirements should be aligned with United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and United Nations Guiding Principles (UNGPs). • Clarify that free, prior, and informed consent (FPIC) applies to all phases and material changes and is binding. • Requirement 2: Relies too heavily on the State to identify potentially affected Indigenous Peoples and does not consider circumstances where state recognition of Indigenous Peoples is limited. • Clarify that early engagement is a pathway to FPIC, not a substitute, and that early engagement processes must include Indigenous governance systems, decision-making protocols, and culturally appropriate formats.

14.1 Section	
Towards Good Practice *(cont'd.)*	• Requirement 4: Include feedback loops to demonstrate how Indigenous input influenced project decisions, and that archives of engagement records are accessible to Indigenous representatives. • Requirement 5: Rephrase, as current wording reflects FPIC as a procedure, risks FPIC being sought after an impact is deemed unavoidable and contains poorly defined or subjective terms. • Requirement 6: Keep requirement in Towards Good Practice, but the stipulation of 'collaboration' is broadly considered Good Practice. • Requirement 7: Provide further clarity on precautionary approach; add establishing no-go buffer zones, emergency protocols for accidental contact, and independent oversight.
Good Practice	• Clarify what happens if consent is not achieved; provide further guidance on providing evidence that engagement processes are conducted in good faith and that activities do not advance while negotiations are ongoing. • Requirement 1: Specify safeguards to make sure the FPIC process is legitimate. • Requirement 2: Strengthen to include consideration of cumulative/ indirect/transboundary impacts, addition of material change triggers, extend to third parties, include gender-based violence and/or defender protections, and require assurance evidence. • Requirement 2 and 3: Duplicative; consider combining. • Requirement 4: Clarify and/or strengthen data sovereignty/permission protocols. • Requirement 6: Ensure consent is specific to defined scope, phases, and impacts, potentially including an FPIC Scope Annex; agreements should detail duration, renewal triggers, and withdrawal conditions; activities must pause if FPIC is withheld or contested; clarify enforceability and escalation; establish a joint implementation committee with Indigenous representatives; define key performance indicators, budget, roles, and review schedule; allow Indigenous-led monitoring and governance; create a redress pathway for breaches with remedies and commit to non-retaliation; provide independent mechanisms for breach cases; ensure contractors adhere to obligations; include a succession clause for transferees; clarify if requirements apply to existing or new agreements; specify expectations if agreements cannot be reached; align with International Council on Mining and Metals (ICMM) Position Statement on Indigenous Peoples and Mining for guidance on good-faith processes and transparency; Ensure applicability to various regulatory frameworks; add wording for cases where agreements cannot be reached; clarify whether this requirement applies retrospectively to existing agreements with Indigenous Peoples. • Requirement 7: Include minimum expectations for monitoring intervals and reporting requirements. • Requirement 10: Distinguish from Towards Good Practice Requirement 6.
Leading Practice	• Add a requirement to refuse sourcing from companies operating in Indigenous territories without FPIC and educate suppliers on Indigenous rights. • Requirement 1: Clarify applicability note 'Facility' or 'relevant' workers; Strengthen to include emphasising Indigenous involvement, refresher training, and ongoing relationship building. • Requirement 2; Emphasise that reconciliation should be Indigenous-led or co-governed, tied to real outcomes, and separate from FPIC. • Include guidance to strengthen negotiation fairness in benefit sharing and agreements. • Requirement 3: Include jointly agreed indicators and annual review processes, independent evaluations led or co-led by Indigenous experts. • Requirement 4: Replace 'make improvements as required' with 'demonstrate continuous improvements'.

14.1 Section	
Leading Practice *(cont'd.)*	• Requirements 4 and 5: Include establishing a frequency for review, Indigenous representatives' participation in reviews, publication of non-sensitive summaries, corrective actions and timeframes. • Requirement 6: Clarify how Requirement will be assessed if permission is not granted, and/or consider additional wording to make provision for alternatives where full disclosure is not feasible (e.g., summary reports, coverage indicators). • Requirement 7: Move to Good Practice or clarify overlap with Requirement 7 in Good Practice; Include training and employment of Indigenous monitors, respecting data sovereignty, and sharing of results in accessible formats.
Glossary and Interpretive Guidance	• Strengthen the definitions in the glossary and embed further guidance for: ○ Agreements ○ Benefit Sharing ○ Demonstrating Consent and FPIC ○ Opposition

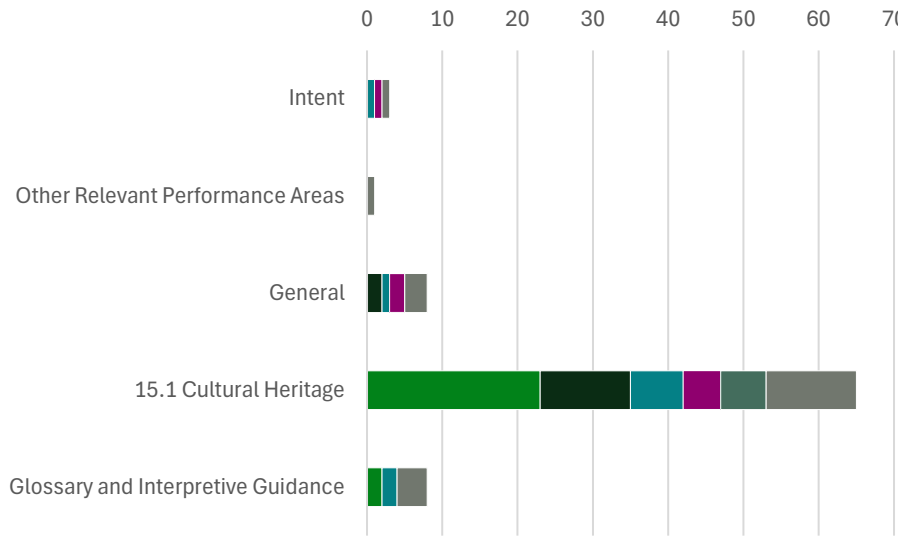
6.4.17 PERFORMANCE AREA 15: CULTURAL HERITAGE

Intent *(as stated in the draft Standard)*
Identify risks to cultural heritage and develop practices and procedures that respect, preserve, and safeguard cultural heritage in collaboration with relevant stakeholders and rights-holders for cultural heritage. Cultural heritage can be Indigenous and non-Indigenous, and can be both tangible (e.g., places and objects) or intangible (e.g., customs, traditions, languages, and beliefs).

85 total comments	**26 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	25
Midstream industry	14
Intergovernmental/ multi-lateral organisation	11
Consultancy	8
Downstream industry	6
All other types	21

Number of Comments on Performance Area Sections



Feedback Summary

- Comments indicate a tension between alignment with International Finance Corporation Performance Standards (IFC PS) 7 and jurisdictional requirements, with many nongovernmental organisations (NGOs) favouring International Finance Corporation (IFC), while Upstream Industry highlights potential for conflict or confusion with regulatory requirements.
- Comments suggest that it leans heavily towards Indigenous Peoples cultural heritage and that the scope should be balanced to include equal focus on intangible and non-Indigenous cultural heritage (including unique geological areas and Outstanding Universal Value [OUV]).
- Requests for further clarification and glossary definitions for terms such as 'critical', 'unavoidable', 'intangible', 'irreplaceability' and to refine United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage definitions.
- Requests to strengthen FPIC linkage for unavoidable impacts; define process for alternatives analysis.
- Requests to move some requirements from Good Practice to Towards Good Practice.
- Stakeholders noted opportunities to strengthen the requirement for the chance finds procedure by making provision for regulator-led processes and mandatory worker training.

TABLE 6-31 DETAILED FEEDBACK BY SECTION: SECTION 15.1

15.1 Section	
Towards Good Practice	• Requirement 2(a): Reword to make provision for government input on all cultural heritage, not just designated or legally protected. • Requirement 3: Move to Good Practice to reflect industry norms; clarify whether requirement could be met if an entity failed to obtain free, prior, and informed consent (FPIC). • Requirement 4: Strengthen to improve clarity and reduce ambiguity. • Requirement 5: Simplify language and align with national and United Nations Educational, Scientific and Cultural Organization (UNESCO) governance frameworks, not override them; expand to stipulate that no current or future operations adversely impact Outstanding Universal Value of World Heritage Sites. • Add requirement to develop a chance finds procedure to establish the foundation for the related Good Practice requirement.
Good Practice	• Add a requirement for a Cultural Heritage Management Plan. • Requirements 1, 3, 5 and 6: Move to Towards Good Practice. • 'Unavoidable' should be determined with input from stakeholders and/or be defined in the Standard to include good-faith efforts to explore alternatives. • Make provision for in situ preservation. • Requirement 3: mention FPIC. • Requirement 4: Strengthen wording to clarify collaboration with traditional owners, users and responsible authorities, and compliance with current national legislation on cultural heritage protection. • Requirement 5: Make provision for state-approved archaeological supervision and chance-find protocols; include training.
Leading Practice	• Requirement 1: Provide further guidance on defined intervals; move to Good Practice. • Requirement 2: Include the involvement of cultural heritage specialists; note that training should be risk-based. • Add a requirement that focuses on collaborating with stakeholders and rights-holders to ensure the Facility reflects the cultural heritage of the area (e.g., in naming of project infrastructure).
Glossary and Interpretive Guidance	• Remove 'as determined by them' in the definition of Indigenous Peoples. • Further guidance and definition of 'unavoidable'. • Include a definition of tangible and intangible cultural heritage and enhance definition of unavoidable impacts.
Intent	• Include further guidance on how to identify intangible heritage in regions with limited cultural documentation. • The word 'preserve' can imply zero impact, which conflicts with the remainder of the Performance Area.

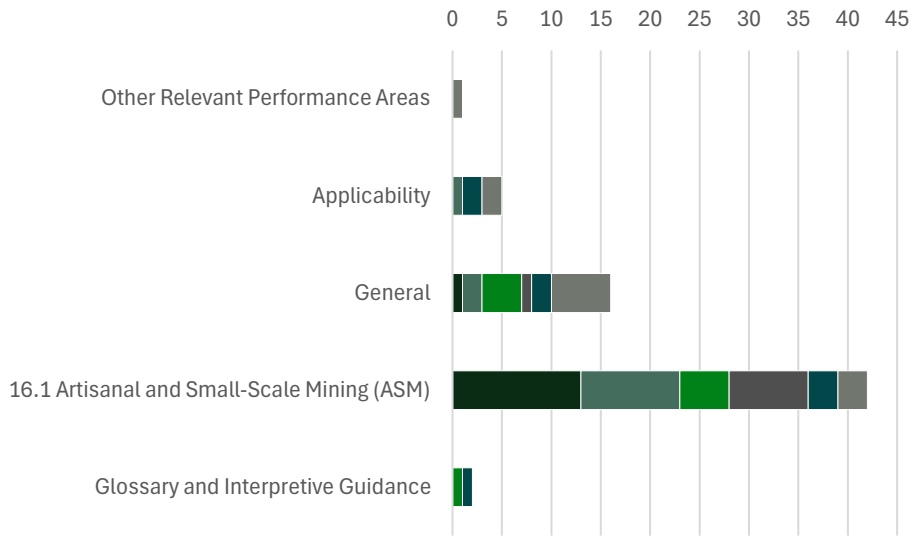
6.4.18 PERFORMANCE AREA 16: ARTISANAL AND SMALL-SCALE MINING

Intent *(as stated in the draft Standard)*
Manage the risks and impacts associated with artisanal and small-scale mining (ASM) operators where they are present. Create economic opportunities and contribute to the professionalisation and formalisation of legitimate artisanal and small-scale mining (ASM) operators in support of more sustainable and inclusive ASM communities.

66 total comments	**25 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Midstream industry	14
Downstream industry	13
Upstream industry	10
Prefer not to say	9
Industry/trade organisation	8
All other types	12

Number of Comments on Performance Area Sections



Feedback Summary

- Multiple respondents request that the Standard clearly state it only supports legitimate artisanal and small-scale mining (ASM), with more explicit exclusion of ASM linked to conflict, criminality, or serious human rights abuses. Respondents express concern that the current wording of requirements that do not use the terms 'legitimate ASM' risk legitimising illegality or exposing companies to significant security, legal, and reputational risks. Alternatively, one commenter encourages the Standard to adopt a more inclusive approach, promoting engagement with ASM actors who may not yet meet full legitimacy criteria but are willing to improve and participate in responsible practices.
- Multiple commenters highlight challenges in assessing ASM legitimacy under the current definition; provide clarification regarding the contexts where ASM is not recognised in the national legal framework; clarify exclusion factors and more objective criteria to assess 'good-faith efforts'.
- Concerns raised about formalisation commitments and support to ASM potentially conflicting with state policy, exposing companies to liability, incentivising encroachment on concessions, or 'normalising' illegal activity.

TABLE 6-32 DETAILED FEEDBACK BY SECTION: SECTION 16.1

16.1 Section	
Towards Good Practice	• Requirement 1: Provide more objective criteria that defines 'good-faith efforts' in the definition adapted by the Organisation for Economic Co-operation and Development (OECD) of legitimate artisanal and small-scale mining (ASM); one commenter cites the CRAFT Code (Code of Risk mitigation for ASM engaging in Formal Trade) as a relevant tool to reference for aiding in determination of ASM legitimacy. • Requirement 2: Multiple commenters note concern regarding a public commitment to support ASM formalisation in contexts where a commitment would conflict with national policies and efforts.
Good Practice	• Requirement 1: Move to Towards Good Practice. • Requirement 3: Current phrasing is too prescriptive regarding the types of engagement and may not reflect an appropriate range of approaches relevant across contexts. • Add security-specific requirements in accordance with Voluntary Principles on Security and Human Rights (VPSHR), specifically training security teams in human rights-based approach to engagement ASM, engagement with competent authorities, and proportional controls to prevent escalation.
Leading Practice	• Requirements 1, 2, 3 and 4: Use more direct language focused on implementation of actions as opposed current framing (i.e., 'Identify' and 'Explore'). • Requirement 4: Consider removing requirement due to concern that transfer of land or mining rights could be interpreted to encourage encroachment, invasion, illegitimate occupation of concessions and undermine security of tender of formal rights-holders.
Glossary	• Legitimate ASM: Multiple commenters call for a clearer definition of legitimate ASM with consideration for national legal frameworks that do not recognise ASM or conflict with the OECD-adapted legitimate ASM definition. One respondent requests geographic- and mineral-specific nuances regarding legitimate ASM be noted (e.g., cobalt in the Democratic Republic of Congo). • Artisanal and Small-Scale Mining: Multiple commenters state the definition of ASM is too broad, as it includes informal, illegal, and illicit activities. Commenters note requirements that do not explicitly distinguish 'Legitimate ASM' may unintentionally legitimise forms of ASM associated with criminality or serious human rights abuses.
Applicability	• Further define the threshold or criteria for determining when ASM presence triggers applicability. • Specify whether exceptions to the requirements apply in situations of significant security risk, credible human rights abuses, conflict, or other factors.
Other Relevant Performance Areas	• Add Performance Area 7 Workers Rights, Performance Area 14 Indigenous People, Performance Area 15 Cultural Heritage, and Performance Area 24 Closure. • Add reference to ASM development in Performance Area 13 Community Impacts and Benefits.

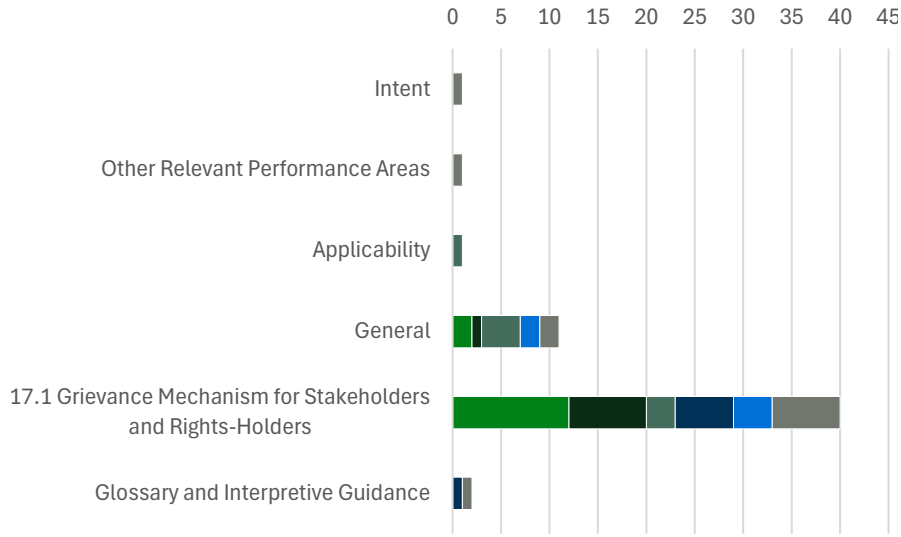
6.4.19 PERFORMANCE AREA 17: GRIEVANCE MANAGEMENT

Intent *(as stated in the draft Standard)*
Enable local communities, including stakeholders and rights-holders to raise issues or concerns and have them resolved by implementing a grievance mechanism in line with the eight effectiveness criteria of the UN Guiding Principles on Business and Human Rights (Principle 31). Provide or enable access to non-judicial remedies for adverse human rights impacts or other harm that the Facility has caused, contributed to, or been linked with.

56 total comments	**24 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	14
Midstream industry	9
Downstream industry	8
Investor	7
NGO/CSO	6
All other types	12

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Provide clearer distinction between operational grievance mechanisms and whistleblower channels, with cross-references where appropriate.
- Strengthen alignment with United Nations Guiding Principles (UNGP) Principle 31 through the addition of explicit language on timely resolution and remedy, and options for complainants to appeal or escalate grievances.
- Require communication in local languages and culturally appropriate formats; clarify channels and levels (facility/community/independent).
- Strengthen guarantees for confidential channels, non-retaliation, and escalation protocols.
- Include sexual and gender-based violence survivor–centred pathways, including confidential, survivor-focused grievance routes with rapid protective measures and specialist referrals.
- Nongovernmental organisations (NGOs) and intergovernmental organisations (IGOs) recommend independent oversight or an ombudsman for complex cases.
- Cross-reference Performance Areas 3, 8, 9, 11, and 15.

TABLE 6-33 DETAILED FEEDBACK BY SECTION: SECTION 17.1

17.1 Section	
Towards Good Practice	• Cross-reference whistleblower mechanisms and retaliation protections. • Provide guidance on culturally relevant communication methods in the context of grievance socialisation.
Good Practice	• Clarify process communication, timelines, and remedy obligations. • Requirements 1 and 4: Move to Towards Good Practice. • Requirement 2: Rewrite for clarity split into two requirements to strengthen the emphasis of corrective actions. • Define a minimum interval for internal reviews of the grievance mechanism. • Add gender-disaggregated reporting requirements. • Requirement 7: Include a specific reference to appeal/escalation routes and confirm that use of the mechanism does not preclude other redress avenues.
Leading Practice	• Requirement 1: Strengthen to include the consideration of power imbalances in the review. • Requirement 2: Remove 'mutually agreed process'. • Use consistent language that includes the protection of privacy and other rights, as provided in Performance Area 6. • Requirement 3: Consider if disclosing response, remediation, or solution actions and timeline could pose a risk to entities or communities; move to Good Practice.
Glossary and Interpretive Guidance	• The definitions in the glossary contemplate avenues of redress and remedies that may be challenging for most companies. • Review potential additional sources from Office of the United Nations High Commissioner for Human Rights listed in feedback.
Intent	• Align to reflect United Nations Guiding Principles (UNGP) commentary on grievance mechanisms and remedy • If harm is only directly linked through business relationships (not caused or contributed by the company), the responsibility is to respect human rights—not to provide remediation—though companies may take a supporting role.

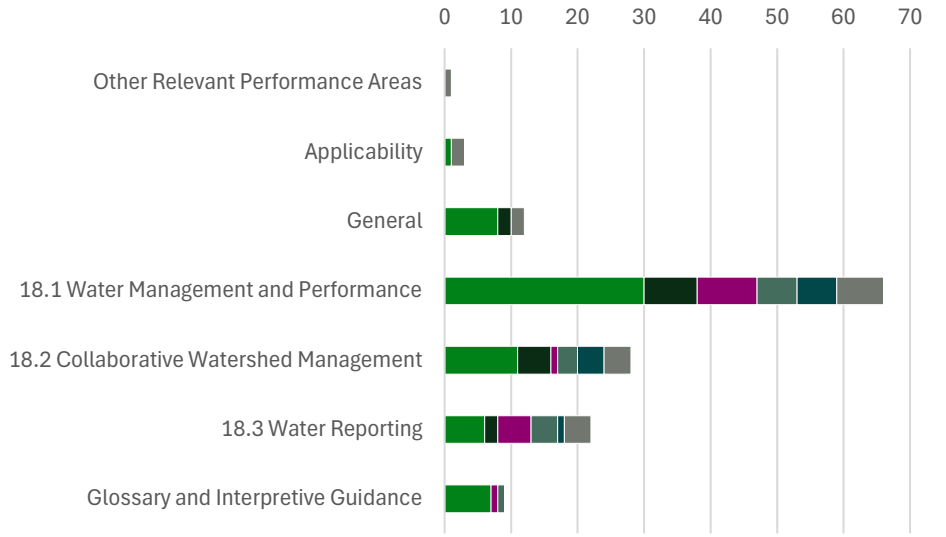
6.4.20 PERFORMANCE AREA 18: WATER STEWARDSHIP

Intent *(as stated in the draft Standard)*
Recognising that access to water is a human right and fundamental ecosystem requirement, integral to well-being and the livelihoods, spiritual and cultural practices of communities, implement water stewardship practices, using the mitigation hierarchy, that support the overall quality and accessibility of watershed resources available to other users and improve the efficiency of water use.

141 total comments	**36 respondents**	**3 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	63
Midstream industry	17
Consultancy	16
Downstream industry	14
Industry/ trade organisation	11
All other types	20

Number of Comments on Performance Area Sections



Feedback Summary

- Scale requirements to site-specific materiality and risk; a flexible, risk-based approach is needed to avoid burdening low-risk facilities.
- Clarify scope and applicability of requirements; distinguish between mining sites and other facility types especially for collaborative watershed management.
- Companies primarily manage water at the facility level; broader catchment-level participation should be reflected under Good or Leading Practice, not as foundational.
- Clear definitions are needed for terms such as 'mature IWRM [Integrated Water Resources Management]', 'ecological health', and 'significant water-related fines' to ensure consistent implementation.
- Provide clearer guidance and alignment with national regulatory frameworks for establishing water quality baselines and assessing cumulative impacts.
- The mitigation hierarchy is underutilised beyond avoidance; include stronger emphasis on water reuse, recirculation, and offsetting measures.
- Integrate climate risk assessments with water infrastructure planning and aligned with other performance areas to avoid duplication.
- Stakeholder engagement, including gender-responsive water planning, is essential for effective water stewardship.
- Transparency in water reporting is widely supported, but expectations should align with existing Environmental, Social, and Governance (ESG) and regulatory disclosures to avoid redundancy.
- Clarify and distinguish between Good Practice and Towards Good Practice requirements to avoid duplication.

TABLE 6-34 DETAILED FEEDBACK BY SECTION: SECTION 18.1

18.1 Water	
Towards Good Practice	• Clarify distinction between operational and predictive water balances; define minimum features and update frequency. • Provide clearer guidance for establishing water quality baselines, especially for legacy sites. • Strengthen training expectations beyond 'familiarisation' to ensure technical competency. • Tie climate risk assessments to water infrastructure design and adaptation triggers. • Clarify overlap with Performance Area 22 and ensure water monitoring aligns with broader water quality frameworks. • In absence of regulatory standards, reference international guidelines (e.g., International Finance Corporation (IFC) Environment, Health and Safety [EHS] Guidelines) for water monitoring. • Clarify scope of water studies and cumulative impact assessments; define watershed boundaries and roles. • Communicate material non-compliance and corrective actions to senior management.

18.1 Water	
Good Practice	• Move establishing water quality baselines to Towards Good Practice. • Align cumulative impact assessments national environmental procedures; consider moving to Leading Practice for complex contexts. • Emphasise water reuse and recirculation; language should allow flexibility for sites already optimised. • Climate risk assessments should be revised 'as appropriate' rather than at fixed intervals due to irregular model updates. • Include continuous learning and enable issue identification and reporting in training. • Allow corporate or regional aggregation of water targets where facilities share a watershed. • Link water objectives to public policy goals where applicable.
Leading Practice	• Elimination of post-closure active water management may not be feasible for all sites; insert 'where appropriate'. • Independent review of water management systems should include stakeholder engagement and define scope, frequency, and independence level. • Encourage exploration of innovative technologies (e.g., dewatering) to reduce water consumption.
Applicability	• Clarify that certain requirements—especially those related to watershed-level engagement—should apply primarily to mining sites. • Industry respondents noted that small industrial sites serviced by municipalities may not be relevant for catchment-level criteria. • Define the scope of Performance Area 18 more clearly to avoid misapplication across different facility types.
Glossary	• 'Mature IWRM (Integrated Water Resources Management)': Provide criteria for assessing maturity to guide implementation. • Ecological health of the watershed: Considered ambiguous; use precise language focused on beneficial uses and water quality. • Material non-compliance: Replacing informal terms like 'significant upset' with clearer definitions such as 'significant deviation from expected performance'. • Water balance: Distinguish between operational and predictive water balances, including updated definitions. • Source control: Broaden the definition to include limiting loads of various contaminants. • Watershed vs. catchment: Clarify that these terms are often used interchangeably and should be defined consistently. • Marine water: Add term to account for offshore mining operations and deep seabed mining contexts.

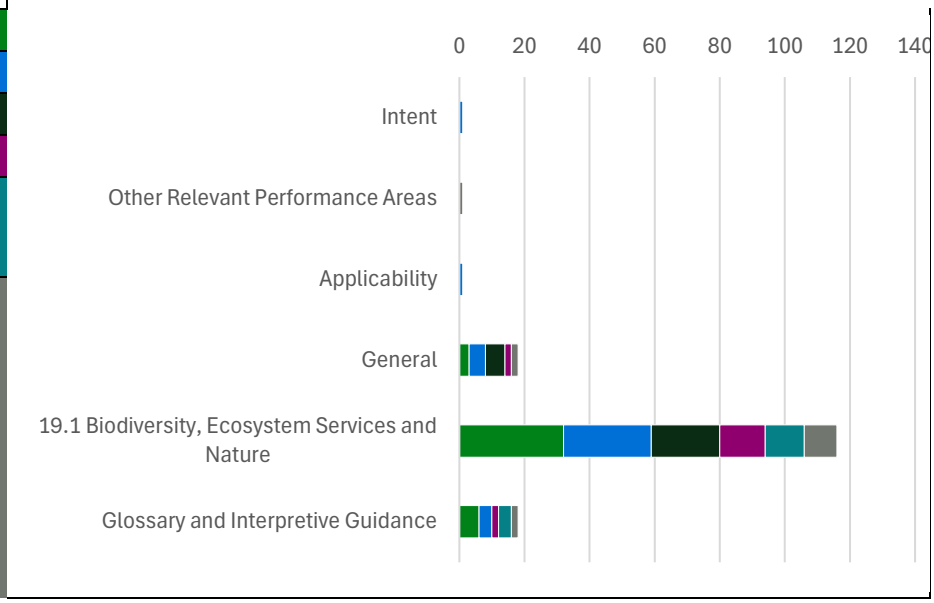
6.4.21 PERFORMANCE AREA 19: BIODIVERSITY, ECOSYSTEM SERVICES AND NATURE

Intent *(as stated in the draft Standard)*
Identify, avoid, minimise and mitigate material risks and impacts to biodiversity and ecosystem services by applying the mitigation hierarchy and by implementing management practices to achieve at least no net loss or a net gain of biodiversity and contribute to a nature-positive future, consistent with the Global Biodiversity Framework.

155 total comments	**45 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	41
NGO/CSO	38
Midstream industry	27
Consultancy	18
Intergovernmental/ multi-lateral organisation	16
All other types	15

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Require consultation with Indigenous Peoples and Local Communities at all practice levels.
- Add specific targets and commitments related to deforestation.
- Add further emphasis on the avoidance step of the mitigation hierarchy, particularly for areas with high biodiversity values.
- Provide clear timeframes, such as a baseline year within requirements (not just definition of no net loss in glossary), public disclosure year, and timeline for no net loss/net gain of biodiversity targets.
- Include critical habitat thresholds from International Finance Corporation Performance Standard 6 for determination of critical habitat.

TABLE 6-35 DETAILED FEEDBACK BY SECTION: SECTION 19.1

19.1: Biodiversity, Ecosystem Services and Nature	
Towards Good Practice	• Requirement 1: Clarify overlap with Performance Area 15; strengthen requirement to include operational impacts and third-party confirmation of no adverse impacts; follow international best practice standards for impact assessment, Operational Guidelines for the Implementation of the World Heritage Convention, and Guidance and Toolkit on Impact Assessments in a World Heritage Context. • Requirement 2: Remove reference to Ramsar sites; align with protected area management objectives and/or plan. • Requirement 5: Significant in 'significant biodiversity values' is not defined; consider rephasing to specify priority or sensitive biodiversity locations instead; include World Heritage sites and any other conservation areas defined in National or Subnational Biodiversity Strategies and Action Plans; baseline year should be specific for target of no net loss of biodiversity for existing operations. • Requirement 6: Specify types of impacts (i.e., direct, indirect, and cumulative). • Requirement 7: Specify actions to include avoidance and minimization; include adaptive management triggers; include additional high biodiversity value land classifications that should be avoided (e.g., all types of protected and conservation areas, important bird and biodiversity areas, areas with high species and plant richness, intact forest landscapes); examples of metrics should be specified and include other frameworks as well, such as those from the Taskforce on Nature-related Financial Disclosures LEAP [Locate, Evaluate, Assess, and Prepare] Assessment approach.
Good Practice	• Requirement 1: Move engagement with communities to Towards Good Practice, while keeping engagement specific to ecosystem in the Good Practice requirements; rephase to clarify the assessment of communities' impacts on ecosystem services. • Requirement 2: Move 'following the mitigation hierarchy' to Towards Good Practice; acknowledge government-approved offset programs and/or a country's regulations for biodiversity offset requirements; separate requirement for net gain for critical habitats from a biodiversity offsets requirement; include a requirement for loss-gain accounting; reference International Finance Corporation Performance Standard 6 definitions of critical habitat thresholds; include biodiversity offset principles (i.e., additionality, equivalence, durability). • Requirement 3: Requirement seen as repetitive, and invasive alien species action is seen as too specific. • Requirement 4: Include local communities and Indigenous Peoples and incorporation of their Ecological Knowledge; make engagement requirements consistent across Performance Areas and address overlap with Performance Areas 4 and 19. • Requirement 5: Move to Leading Practice; clarify expected level of methodological detail for disclosure (e.g., overall approach, key assumptions, and principles used to achieve no net loss or net gain). • Requirement 6: Specify that disclosures be made within the limits imposed by commercial confidentiality, protection of sensitive information, and operational security requirements; include disclosure against Biodiversity Management Plan targets, no net loss and net gain targets, and monitoring outcomes.

19.1: Biodiversity, Ecosystem Services and Nature	
Leading Practice	• Add requirement related to value chain, such as those included in International Council on Mining and Metals (ICMM) nature position statement requirements • Requirement 1: Clarify how the Requirement will be audited; provide clearer specifications on landscapes and expected actions. • Requirement 2: Include clearer specifications to support auditability (e.g., operationalising this via Taskforce on Nature-related Financial Disclosures–aligned governance, strategy, risk/impact processes and capital allocation (e.g., biodiversity investment screens/criteria). • Requirement 3: Specify net gain of biodiversity rather than no net loss to support a nature positive future. • Requirement 4: Clarify the intent behind and distinction between 'independent review' and 'independent assurance' and whether this constitutes an additional layer of external verification beyond the Consolidated Mining Standard Initiative (CMSI) assurance cycle; specify the scope, frequency, and qualifications expected.

6.4.22 PERFORMANCE Area 20: Climate Action

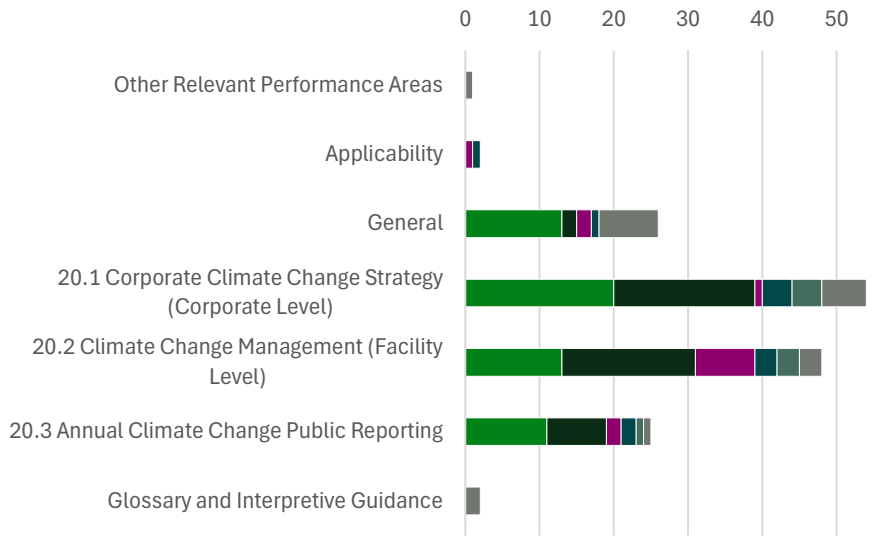
Intent *(as stated in the draft Standard)*
Reduce Scope 1, 2 and material Scope 3 greenhouse gas (GHG) emissions by defining science-informed targets or objectives in line with the Paris Agreement and by implementing the mitigation hierarchy to avoid and reduce emissions. Identify physical climate-related risks, impacts and opportunities and develop and implement appropriate adaptation measures.

158 total comments	**41 respondents**	**3 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments

Upstream industry	57
Midstream industry	47
Consultancy	14
Industry/ trade organisation	11
Downstream industry	8
All other types	21

Number of Comments on Performance Area Sections



Feedback Summary

- Many requirements are viewed as unclear or insufficiently defined, especially around scopes, boundaries, target setting parameters, and terminology.
- Requirements perceived as uneven across Practice Levels: Towards Good Practice is too weak, while several Leading Practice requirements are either unrealistic, overly prescriptive, or not leading
- Scope 1–3 treatment is inconsistent, with calls for clearer definitions, earlier introduction of Scope 3, and closer alignment with International Financial Reporting Standard (IFRS) S2 and greenhouse gas (GHG) Protocol.
- Mitigation, adaptation, facility planning, and corporate facility alignment are seen as poorly integrated, with missing links to mine planning, capital allocation, and Performance Area 10, Emergency Preparedness and Response.
- Some reporting and assurance expectations lack clarity, including assurance scope, facility vs. corporate disclosure, and inconsistent reference to IFRS vs. Towards Sustainable Mining (TCFD).
- Feasibility concerns arise from jurisdictional and operational realities, particularly for remote/off grid operations and those constrained by national regulatory regimes.
- Assurance requirements are viewed as unclear or incomplete, with some recommendations for elevating assurance to Leading Practice.

TABLE 6-36 DETAILED FEEDBACK BY SECTION: SECTION 20.1

20.1 Corporate Climate Change Strategy (Corporate Level)	
Towards Good Practice	• Provide clarity and specificity on scopes, baselines, targets, frameworks, and basic greenhouse gas (GHG) management expectations. • Strengthen requirements in Practice Level, including items such as quantified Scope 1–2 inventories, adaptation integration, clear roadmaps, and minimum disclosure; provide clearer minimum expectations to avoid greenwashing.
Good Practice	• Requirement 1: Seen as too high-level or conceptually blended; provide further clarity to support documentation and alignment; rephrase to avoid subjective words like 'leading;' rephrase alignment with goals of the Paris Agreement or reference International Financial Reporting Standards (IFRS) specifically. • Requirements 2 and 4: Move to Towards Good Practice Level; clarify Scope 1-3 expectations.
Leading Practice	• Clarify if targets and commitment requirements are for Scope 1, 2, and/or 3 emissions across requirements; Scope 3 expectations, offsets, carbon intensity definitions, and engagement processes require clearer boundaries and feasibility checks. • Requirement 3: Clarify expectations for external engagement processes; current approach to climate change strategy may be too prescriptive; clarify phrasing and provide measurable targets. • Requirement 4: Define 'social value' and add 'where possible'; consider removing requirement to protect propriety information. • Requirement 5: Move to Good Practice; focus Requirement on disclosure of carbon pricing practices rather than decision-making processes. • Requirement 6: Clarify scope of emissions; clarify disclosure requirements.
Glossary and Interpretive Guidance	• Multiple definitions require greater precision (e.g., 'adaptation', 'carbon offsets', 'storage', 'facility', 'material' emissions). • Expand definitions to include carbon removals, nongeological storage, International Organization for Standardization (ISO) Standard 14068 for science aligned targets. • Clarify that business unit/asset level disclosure counts as facility level when contextualised. • Add definitions for standard emissions data models and Scope 3 boundaries to support consistency.

TABLE 6-37 DETAILED FEEDBACK BY SECTION: SECTION 20.2

20.2 Climate Change Management (Facility Level)	
Towards Good Practice	• Requirement 1: Specify internationally recognised frameworks; move to Good Practice Level. • Requirements lack clarity and specificity on scopes, baselines, targets, frameworks, and basic greenhouse gas (GHG) management expectations. • Some commenters see Towards Good Practice as too weak, missing foundational items such as quantified Scope 1–2 inventories, adaptation integration, clear roadmaps, and minimum disclosure. • Terms like 'internationally recognised frameworks' and 'evaluation' are too vague, hindering usability. • Several elements should be moved to Good Practice (e.g., energy/GHG monitoring systems). • Strong calls for clearer minimum expectations to avoid greenwashing, including explicit Scope 1–2 commitments.

Good Practice	• Requirement 1: Remove 'objectives' to clarify focus on 'targets' for clearer interpretation. • Requirement 2: Simplify language, such as removing 'short-, medium- and long-term' phrasing. • Requirement 3: Change framing of the requirement to focus on mitigation, monitoring, and reporting rather than compliance. • Requirement 5: Clarify overlap with Requirement 4; provide further guidance and boundaries. • Requirement 6: Viewed as potentially impractical, repetitive with other stakeholder engagement processes, and challenging to implement at the facility level; consider moving to Leading Practice. • Requirement 7: Specify whether review must be audited or can be an internal assessment; clarify purpose, scope, and deliverables required. • Requirement 8: Conflicting suggestions to remove or move requirement to be earlier in the Practice Level due to importance; change 'low-emissions or renewable energy' to 'fossil free energy'.
Leading Practice	• Requirement 1: Move to Good Practice Level; clarify scope of emissions and scope of measurement (operational vs. life cycle, corporate vs. facility); rephrase to reduce vague phrases and prevent loopholes for non-compliance. • Requirement 3: Add related requirements to all Practice Levels in Section; clarify how assurance is managed if there is no mutual interest; consider adding reference to Community Benefit Agreements. • Requirement 4: Conflicting feedback on whether requirement lacks actionable clarity or is too prescriptive; consider focus on disclosure rather than prescribing strategy.

TABLE 6-38 DETAILED FEEDBACK BY SECTION: SECTION 20.3

20.3 Annual Climate Change Public Reporting	
Towards Good Practice	• Requirement 1: Consider moving Requirement-related public reporting in Section 20.1; change phrasing to 'fossil free' instead of 'renewable'.
Good Practice	• Requirement 1: Provide further clarity on disclosure requirements; include Scope 3 emissions; reference International Financial Reporting Standards (IFRS) S2 instead of Task Force on Climate-related Financial Disclosures (TCFD). • Requirement 2: Move to Leading Practice; clarify what is being assured.
Leading Practice	• Requirement 1: Clarify how carbon content and carbon intensity are calculated. • Requirement 2: Move to Good Practice; clarify why Scope 3 reporting is separated.

6.4.23 PERFORMANCE AREA 21: TAILINGS MANAGEMENT

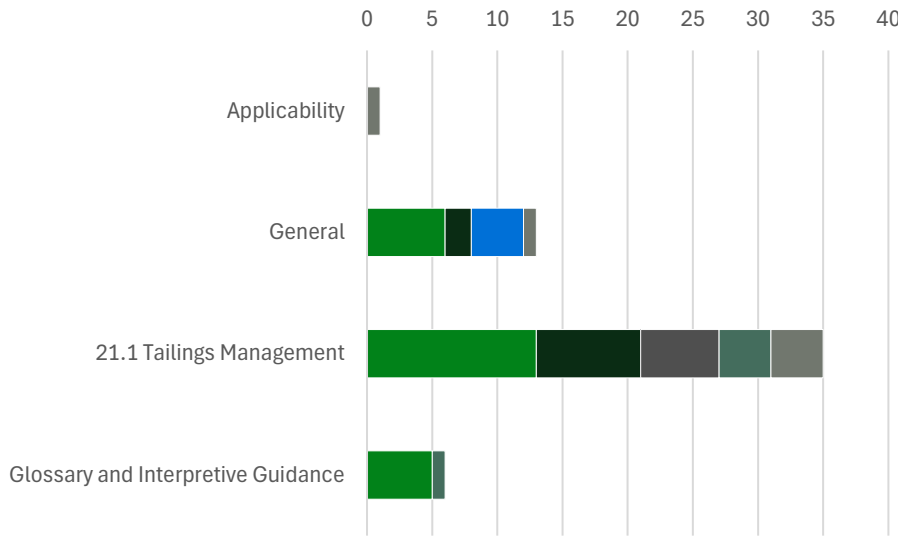
Intent *(as stated in the draft Standard)*
Manage tailings in a safe and responsible manner throughout the life cycle with the objective of minimising harm to people and the environment by implementing a Tailings Management System (TMS) that reflects comprehensive, risk-based management, and governance practices in line with internationally recognised standards.

55 total comments	**23 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments

Upstream industry	24
Midstream industry	10
Prefer not to say	6
Downstream industry	5
NGO/CSO	4
All other types	6

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Consider additional options for Leading Practices beyond the three innovative approaches identified along with further clarification for the identified approaches; suggestions for additional innovative approaches include eliminating credible failures, a commitment to research and development, reduction of water in the Tailings Storage Facility (TSF), and a focus on Best Available Technology or Practices for new mines.
- Clearer definitions are needed, including waste rock in the tailings facility example that classifies commingled tailings/waste rock facilities as tailings facilities.
- Provide flexibility to demonstrate compliance through additional national and international codes and standards; add language ensuring operations will be conducted in accordance with the United Nations Guiding Principles (UNGPs).
- Additional clarification of the assurance requirements is requested, especially with the Global Tailings Management Institute (GTMI) proposing an assurance protocol for Global Industry Standard on Tailings Management (GISTM).

TABLE 6-39 DETAILED FEEDBACK BY SECTION: SECTION 21.1

21.1 Tailings Management	
Towards Good Practice	• Strengthen and clarify the requirement to publicly disclose non-conventional in the requirement. • Mining Association of Canada (MAC) and Global Industry Standard on Tailings Management (GISTM) are too distinct to be used interchangeably; require GISTM for higher consequence facilities and allow MAC for lower consequence facilities.
Good Practice	• Consider acknowledging that the Global Tailings Management Institute (GTMI) may prepare their own conformance standards in place of the International Council on Mining and Metals (ICMM) conformance protocols. • Edit Requirements 1 and 4 for consistency; Requirement 1 requires conformance and Requirement 4 requires identification of gaps. One requirement may refer to conventional tailings, and one may refer to non-conventional. • Requirement 1: Move to Towards Good Practice. • Requirement 3: Move to Leading practice as independent assurance is more consistently a Leading Practice in other sections. • Requirement 4: Conflicting feedback on whether to move to Towards Good Practice or Leading Practice; consider potential redundancy when repeating the requirements of GISTM.
Leading Practice	• Ore grades are decreasing globally leading to more tailings. A leading metric that focuses strictly on reducing the quantity of tailings may not be practical. • The metrics for leading practice are limited and difficult to measure. Consider adding other metrics including research and development into mitigating the need for tailings or eliminating credible failure modes. • More clarity is required around what entails tailings reprocessing. • Clarify whether underground tailings used as backfill would qualify as a tailings reduction as a leading practice.
Glossary and Interpretive Guidance	• Deep-sea tailings disposal: Correct typo to read 'Tailings are discharged through a submerged pipe…' • In-lake disposal of tailings: Replace with 'lacustrine' and remove the references to Canada in the definition. • Clarify in the definitions whether filtered tailings are considered conventional or non-conventional tailings.

6.4.24 PERFORMANCE AREA 22: POLLUTION PREVENTION

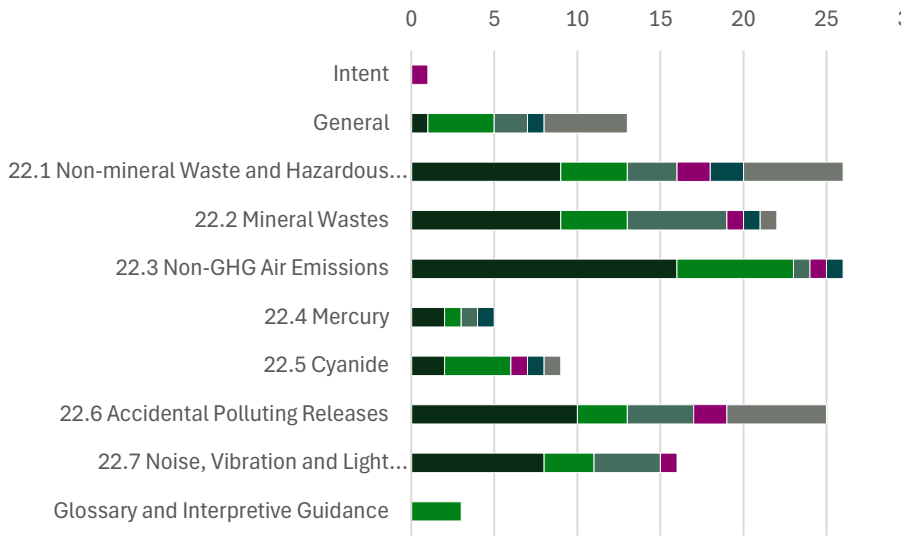
Intent *(as stated in the draft Standard)*
Apply the mitigation hierarchy to prevent pollution, manage releases and waste and address risks of adverse impacts to human health and the environment that the Facility has caused, contributed to, or is directly linked with. Support the Minamata Convention's objective of reducing mercury emissions for the protection of human health and the environment.

146 total comments	**34 respondents**	**7 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments

Midstream industry	57
Upstream industry	33
Downstream industry	21
Consultancy	9
Industry/ trade organisation	7
All other types	19

Number of Comments on Performance Area Sections



Feedback Summary

- The use of the mitigation hierarchy is seen as positive.
- Additional guidance on public disclosure requirements, including on whether Global Reporting Initiative (GRI) reporting is considered equivalent for assurance purposes, has been requested.
- Guidance on determining what is 'significant', where applicable, has been requested.
- Clarification for how Towards Good Practice Requirement 4 and Good Practice Requirements 1 and 4 overlap and interact is needed.
- Requirements to 'minimise mineral waste' and 'avoid mineral waste' should be adjusted to be more realistic expectations, such as 'reducing mineral waste'.
- A clear linkage with the Performance Area 19, Biodiversity is needed.

TABLE 6-40 DETAILED FEEDBACK BY SECTION: SECTION 22.1

22.1 Non-mineral Waste and Hazardous Materials Management	
Towards Good Practice	• Requirements to minimise and avoid mineral waste at this level may be impractical. • Requirement 4: Overly broad; include a threshold such as 'significant'.
Good Practice	• Requirement 1: Move to Towards Good Practice; include local stakeholders and communities as participants in the risk development process of waste generated. • Requirement 5: Include a materiality threshold for public disclosure performance related to waste; Move to Leading Practice to differentiate from Requirement 3.
Leading Practice	• Targets associated with waste reduction and hazardous materials management are often longer-term objectives and thus difficult to measure on a year over year basis. • Add a requirement to collaborate or partner with a local enterprise to explore repurposing waste into viable consumer goods.
Glossary and Interpretive Guidance	• Non-mineral waste: Clarify overlap with 'mineral waste' such as waste rock.

TABLE 6-41 DETAILED FEEDBACK BY SECTION: SECTION 22.2

22.2 Mineral Wastes (excluding tailings)	
Towards Good Practice	• Requirement 1: Seen as overly ambitious.
Good Practice	• Requirement 1: Move to Towards Good Practice; storing mineral waste in a manner that is physically and geochemically stable should be viewed as a baseline expectation. • Requirement 2: Clarify requirement to identify actions to reduce risk in addition to implementing actions to address risk. • Requirement 3: Base rehabilitation on stability assessments as some instances it may not make sense to rehabilitate a stockpile.
Leading Practice	• Collaboration is generally seen as positive; however, there may be times where collaboration does not make sense based on the facility location and a negligible risk profile and therefore may not be achievable.

TABLE 6-42 DETAILED FEEDBACK BY SECTION: SECTION 22.3

22.3 Non–Greenhouse Gas Air Emissions	
Towards Good Practice	• Requirement 2: Provide flexibility for existing facilities in establishing baseline data for emissions sources.
Good Practice	• Requirement 2: Provide additional guidance on establishing targets and objectives that are 'protective of human health and the environment'. • Provide additional guidance for situations where ambient air monitoring and environmental monitoring are government mandated and outside of a facilities control, or where legal constraints limit a facility driven monitoring programme.
Leading Practice	• Clarify participatory monitoring.
Glossary and Interpretive Guidance	• Add participatory monitoring to the glossary; include it in the interpretive guidance documents.

TABLE 6-43 DETAILED FEEDBACK BY SECTION: SECTION 22.4

22.4 Mercury	
Towards Good Practice	• Requirement 3: Clarify and provide additional guidance for threshold for 'significant'.
Good Practice	• Good practice related to artisanal and small-scale mining (ASM) should only be applicable if the scope is limited to truly legitimate ASM. The definition of legitimate ASM should be revised.

TABLE 6-44 DETAILED FEEDBACK BY SECTION: SECTION 22.5

22.5 Cyanide	
Towards Good Practice	• Requirement 3: Provide further guidance if self-assessment is a one-time assessment or to be completed at a specific frequency. • Where local regulatory jurisdictions have equivalent standards to the International Cyanide Management Code, allow local regulations in place of International Cyanide Management Code compliance.
Leading Practice	• Suggest removing the requirement to collaborate to encourage broader industry adoption. It is beyond the scope of this standard for companies to be required to influence adoption of standards for other companies.

TABLE 6-45 DETAILED FEEDBACK BY SECTION: SECTION 22.6

22.6 Accidental Polluting Releases	
Good Practice	• The requirement to remediate adverse impacts from a significant accidental polluting release should be moved to the Towards Good Practice Section, even though it includes the requirement to consult with local stakeholders. Remediation and consultation should be seen as basic requirements. • The requirement to remediate adverse impacts from 'significant' accidental polluting releases is open to too much interpretation due to lack of guidance on defining what is significant. • The requirement to conduct a post-incident internal review if a significant accidental polluting release occurs should be moved to the Towards Good Practice section.
Leading Practice	• In line with feedback from other sections, defining 'significant' is important for consistent application of the standard.
Glossary and Interpretive Guidance	• Accidental release: Clarify definition to be a release that includes significant risk to public health or the environment; significant must also be defined in terms of risk thresholds.

TABLE 6-46 DETAILED FEEDBACK BY SECTION: SECTION 22.7

22.7 Noise, Vibration and Light Pollution/Nusiance	
Towards Good Practice	• Requirement 1: Provide guidance or a standard reference for noise, vibrations, and light, as many jurisdictions do not regulate noise and vibrations and light pollution so implementing a monitoring programme informed by regulatory requirements may be a challenge. • Requirement 2: Limit baseline requirement to greenfield developments, as requirement to establish baselines does not make sense for existing facilities who have gone through the permitting process and may have significant data.
Good Practice	• Requirement 2: Move to Towards Good Practice. • Requirement 3: Change phrasing from 'the presence and location of people, flora, and fauna' to 'the presence and location of sensitive receptors'.

6.4.25 PERFORMANCE AREA 23: CIRCULAR ECONOMY

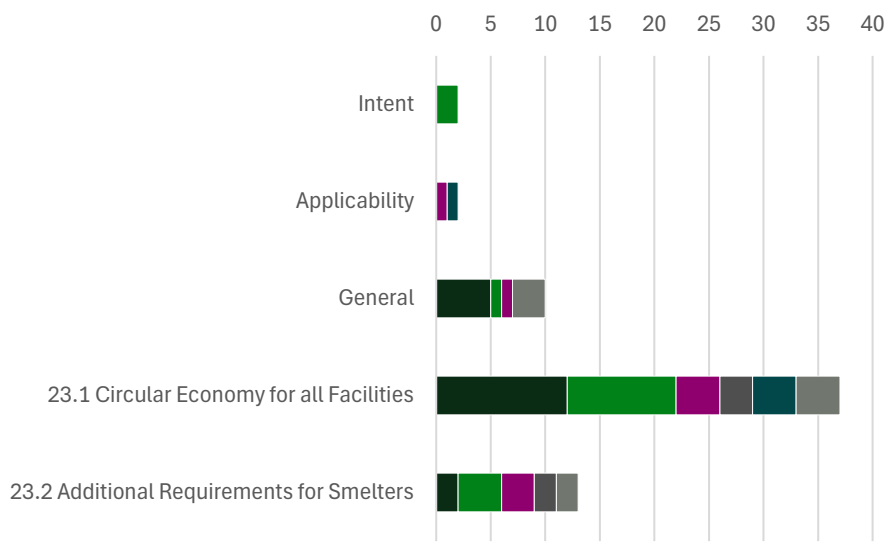
Intent *(as stated in the draft Standard)*
Promote a circular economy through the collection, reuse, and recycling of materials, the reduction of waste and increased resource efficiency in Facility design, operation, and decommissioning.

64 total comments	**25 respondents**	**2 Performance Area sections**

Top 5 Stakeholder Groups Providing Comments

Midstream industry	19
Upstream industry	17
Consultancy	9
Prefer not to say	5
Industry/ trade organisation	5
All other types	9

Number of Comments on Performance Area Sections



Feedback Summary

- Provide clearer terminology, definitions, and measurable criteria across Performance Area, especially around circularity, waste metrics, and documented progress.
- Clarify applicability boundaries and flexibility; respondents indicate Performance Area is overfocused on smelters and scrap-based circularity, creating misalignment for extraction only mines and primary smelters.
- Comments highlight economic and technical feasibility constraints, particularly for tailings minimisation, scrap processing, life cycle planning, and new recycling business models.
- Broad concern that several requirements belong to higher/lower performance levels, especially commitments at Towards Good Practice, tailings in Good Practice, and life cycle circularity planning.
- Several comments request better alignment with other Performance Areas on materials/waste, tailings, closure, and RBC to avoid redundancy.
- Strengthen Towards Good Practice and Good Practice levels, including stronger baselines, monitoring, and waste hierarchy alignment.
- Provide more guidance, examples, and data expectations (inventories, scrap data, feasible metrics).

TABLE 6-47 DETAILED FEEDBACK BY SECTION: SECTION 23.1

23.1 Circular Economy for All Facilities	
Towards Good Practice	• Public circularity commitments should be corporate level, with facilities demonstrating implementation. • Requirement 1: Move to Good Practice Level; 'circularity' vs 'circular economy' terminology is unclear. • Stakeholders request consistency and inclusion of the biological cycle (biodegradable materials, regeneration, etc.) in addition to the technical cycle which is the current emphasis. • Requirement 2: Expectations on identifying and documenting waste streams, including whether measurement and public disclosure are required.
Good Practice	• Requirements stating 'identify opportunities' create ambiguity; clarify whether identification implies investigation or implementation and add 'where feasible' wording. • Requirements 1 and 2: Clarify overlap with Performance Area 21, Tailings Management, where minimisation is included under Leading Practice Level. • Requirement 1: Include mention of labour rights and human rights in supply chain. • Requirement 4: Specify 'where feasible' or 'where applicable'. • Life cycle circularity planning is seen as too complex for Good Practice and not feasible for older facilities.
Leading Practice	• Requirement 1: Clarify metrics; add zero waste to landfill. • Requirements 2 and 3: Clarify metrics and boundaries, as 'documented progress' is seen as unmeasurable and difficult to audit. • Requirement 3: May not reflect realities of end-of-life operations, commercial viability, or technological limits (especially tailings). • Include product-level circularity targets, recyclability information, and traceability for smelters, where relevant.
Glossary and Interpretive Guidance	• Provide clearer definitions for circularity, cycles (technical/biological), and measurable indicators (recycled input ratio, reuse percent, material efficiency). • Clarify distinctions between facility and corporate-level applicability, especially for commitments and strategy. • Integrate or align Performance Area with Materials/Waste, Tailings, Closure, Responsible Supply Chains, and incorporate Performance Area 13 as relevant context. • Provide guidance on data requirements (purchases, inventories, scrap traceability) for auditability. • Rewrite the intent using explicit circular economy principles and including 'among others'.

TABLE 6-48 DETAILED FEEDBACK BY SECTION: SECTION 23.2

23.2 Additional Requirements for Smelters	
Good Practice	• Requirement 3: Provide clearer guidelines and methodologies; may not be applicable to all mining sites. • Requirement 5: Align with similar Requirement in Performance Area 3 included at Leading Practice Level.
Leading Practice	• Requirement 2: Move to Good Practice Level. • 'Documented progress' is seen as unmeasurable and difficult to audit; clearer metrics and boundaries are requested. • Several Leading Practice expectations appear applicable only to secondary aluminium, not primary producers; need differentiation based on facility type. • Requirement 4: Retain 'where feasible' phrasing.

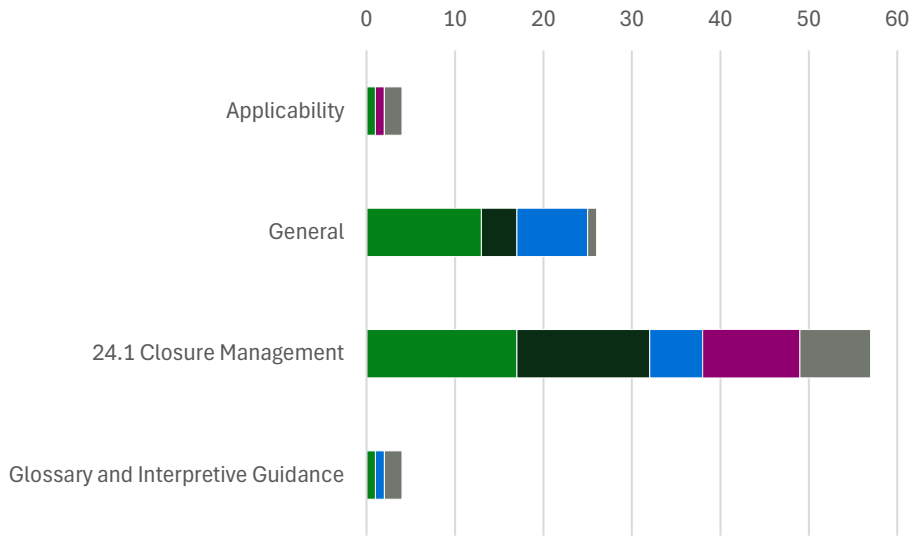
6.4.26 PERFORMANCE AREA 24: CLOSURE

Intent *(as stated in the draft Standard)*
Plan and design for progressive rehabilitation and closure in consultation with relevant authorities, stakeholders and rights-holders, address closure-related environmental and social risks, impacts, and opportunities and make financial provision to enable implementation of closure and post-closure commitments.

91 total comments	**31 respondents**	**1 Performance Area section**

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	32
Midstream industry	19
NGO/CSO	15
Consultancy	12
All other types	13

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- Broad support for the inclusion of closure as a life cycle consideration, aligning with international and national good practices.
- Strong emphasis on proportionality—closure planning expectations should scale with the asset's life-cycle stage.
- Concerns about premature stakeholder engagement; meaningful consultation should occur when closure pathways are credibly defined.
- Financial assurance and disclosure requirements are widely supported but need clearer boundaries to balance transparency with commercial sensitivity.
- Social transition planning is acknowledged as critical but must be shared across industry, government, and communities; companies should support, but not be solely accountable for, long-term outcomes.
- Gender-responsive planning and progressive rehabilitation should be integrated more broadly.
- Terminology and definitions (e.g., 'material risks', 'temporary closure') should be clarified and stronger linkages to other performance areas (e.g., water, biodiversity, tailings) made.
- Innovative proposals include multi-capital optimisation and knowledge retention for perpetual care, suggesting a future-oriented approach to closure planning.

TABLE 6-49 DETAILED FEEDBACK BY SECTION: SECTION 24.1

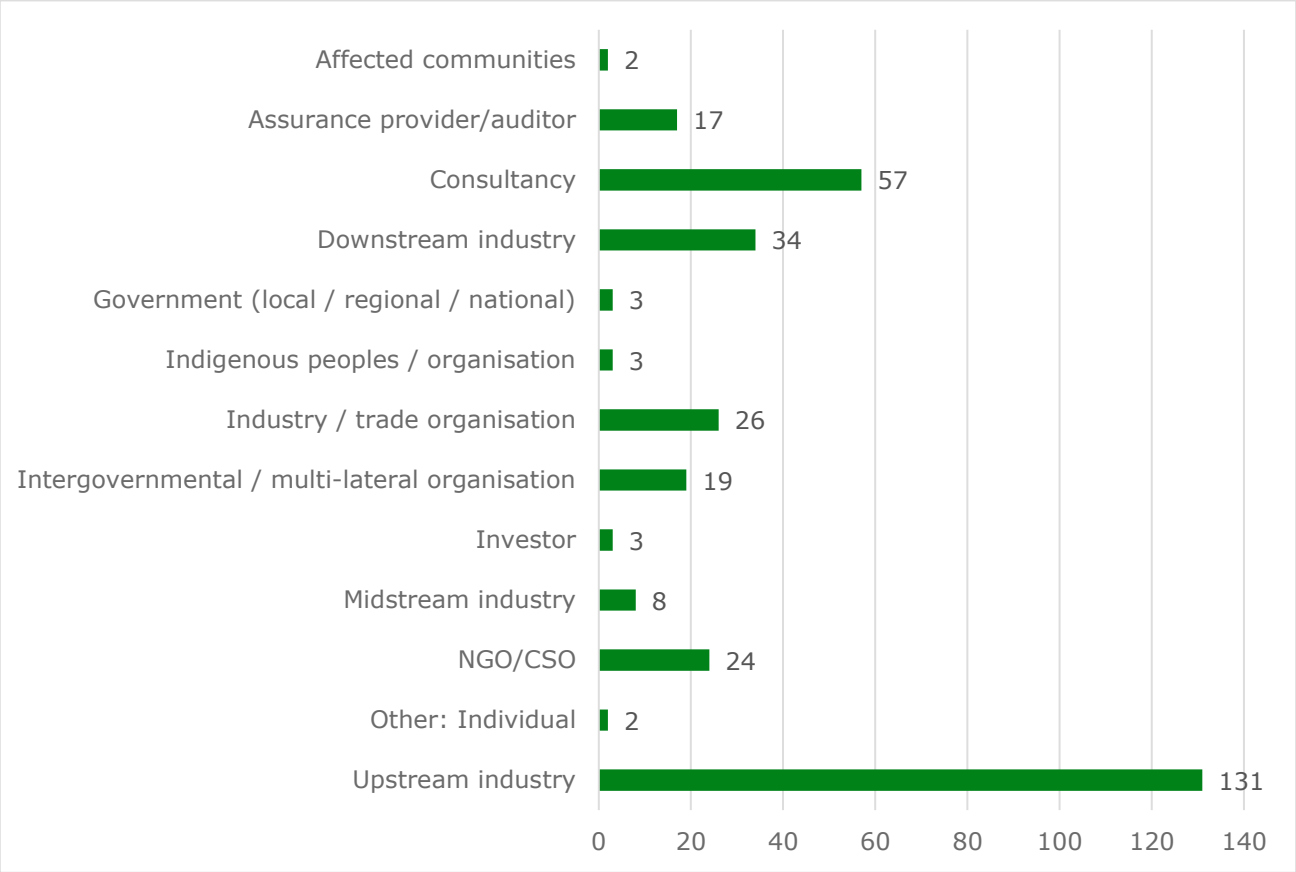
24.1 Closure Management	
Towards Good Practice	• Scale early stakeholder engagement to the asset life cycle; premature engagement may cause confusion or workforce instability. • Clarify applicability to legacy mines lacking early-stage closure planning. • Financial assurance expectations should be realistic and consider jurisdictions without legal mandates.
Good Practice	• Expand risk and impact planning to include seabed environments and gender-responsive socioeconomic transition programmes. • Social transition planning is complex and may warrant elevation to Leading Practice. • Collaboration with stakeholders should leverage formal participation mechanisms and focus on measurable success criteria. • Progressive rehabilitation should be integrated into operational planning and risk management systems. • Provide flexibility for facilities where progressive closure is not feasible. • Align financial estimates and provisions with accounting standards and clearly define closure completion conditions. • Allow flexibility for defined intervals for plan updates based on knowledge domains and operational realities. • Temporary and sudden closure planning should focus on emergency preparedness rather than detailed cost estimation.
Leading Practice	• Public disclosure of closure cost methodologies supported, but detailed financial assumptions may be commercially sensitive. • Companies should support responsible social transitions but not be held solely accountable for long-term outcomes. • Proposals for multi-capital optimisation in closure decisions to maximise value across financial, natural, social, and other capitals. • Knowledge capital retention and intergenerational transfer systems recommended to ensure long-term stewardship. • Specify components of closure cost estimates and standardise methodologies for cross-company comparison.
Applicability	• Closure planning requirements should be scalable based on proximity to closure. • In jurisdictions like Chile, closure plans must be approved by certified professionals and cannot be modified without formal regulatory processes.
Glossary and Interpretive Guidance	• Affected stakeholders: Clarify definition in alignment with national assessment processes. • Financial provision definitions should include undiscounted cost estimates. • Rehabilitation should include seabed environments to cover deep-sea mining contexts. • Reference external guidance (e.g., International Council on Mining and Metals [ICMM], International Finance Corporation- Office of the Compliance Advisor/Ombudsman [IFC-CAO], United Nations [UN]) to support responsible exit and closure planning.

6.5 ASSURANCE PROCESS

Stakeholders submitted 329 comments on the proposed Assurance Process and approximately 58 percent of the comments were submitted on Section 4, Consolidated Standard External Assurance Process.

Fifty-four stakeholders provided feedback on the Assurance Process, including 12 upstream industry respondents, 10 NGO/CSO respondents, and 9 consultancy respondents. The highest number of comments were submitted by Upstream Industry respondents at 131 comments.

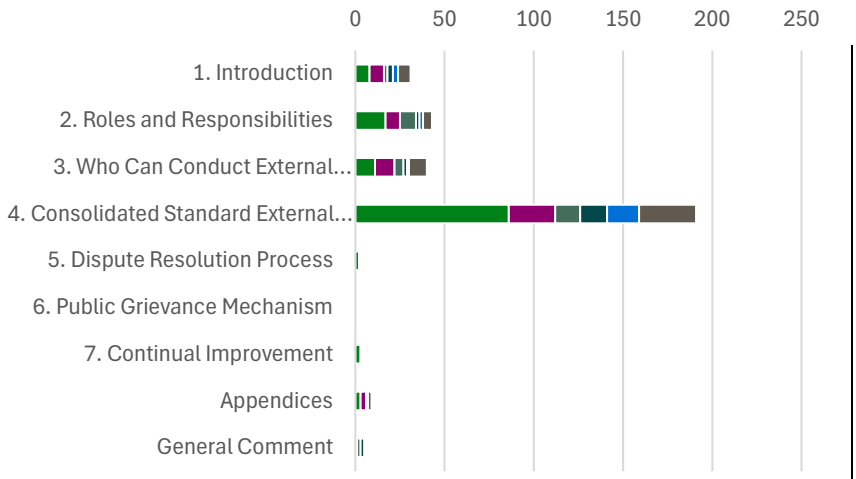
FIGURE 6-8 NUMBER OF COMMENTS BY STAKEHOLDER TYPE ON ASSURANCE PROCESS



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	131
Consultancy	57
Downstream industry	34
Industry/ trade organisation	26
NGO/CSO	24
All other types	57

Number of Comments on Performance Area Sections



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Feedback Summary

- **Roles and Responsibilities**
  - Clarity needed on the role of National Panels during assurance; comments seek to better understand how panels will be formed and governed.
- **Timeline consistency and feasibility**
  - Annual self-assessment seen as too onerous, not allowing time for meaningful progress; comments suggest 18-month frequency, while some question whether self-assessments are necessary
  - Review timeline for report submission; may be too short post-audit to accommodate potential follow-up actions with either the auditee or contacted stakeholders; some variances in allowable time for reporting were noted among the sections and figures.
- **Assurance provider competencies**
  - Role of Subject-Matter Experts (SMEs) in assurance was considered positive; concern raised that a single qualified lead auditor could potentially be accompanied by a team of SMEs with no auditing experience.
  - The need for accreditation of assurance providers was raised, especially by respondents from the downstream supply chain.
  - Comments on setting minimum team size criteria.
- **Independence and conflicts of interest**
  - The requirement that an assurance team could be used for up to three cycles was identified to be confusing as it did not address the candidacy of individual auditors beyond three cycles.
  - Concerns were raised regarding the participation of observers, including the Secretariat. It was suggested this should be at the discretion of the assurance provider.

Feedback Summary

- **Stakeholder engagement**
  - Comments highlight the importance of independence during identification of stakeholders to be interviewed; suggestion that the process needs to go beyond facility-led identification.
- **Assurance Methodology**
  - The risk-based approach to assurance received comments regarding the process used to identify significant potential impacts, with mention of several potential contributing factors not included in the process described.
- **Fee policy and administrative burden**
  - Consider including a tiered pricing approach to accommodate revenue, size, and/or adjusted to commodity prices.
  - Clarify whether the Medium-Term Corrective Actions Assurance would incur additional fees.
- **Reporting granularity and transparency**
  - Mixed feedback on level of transparency in reporting; some commenters requested more transparency while others stated that the proposed level would present challenges with privacy and business confidentiality.
  - Specify whether corrective action plans identified by assurance providers will be publicly available.
  - Many would like to see continual improvement plans that require actions to progress from Good to Leading Practice.

TABLE 6-50 DETAILED FEEDBACK BY SECTION: ALL SECTIONS

All Sections	
Introduction	• Consider adding a Performance Area applicability table for smelters and refiners. • Adopt tiered fees and streamline administrative requirements. • Provide self-assessment tools to reduce burden. • Strengthen auditor independence and conflict-of-interest rules; clarify selection authority; consider firm accreditation and re-tendering limits. • Align with UNGP effectiveness criteria; ensure accessibility, languages, remedy pathways, and non-retaliation protections for stakeholders. • Replace annual self-assessments with a single midpoint check; specify scope (scores vs. qualitative evidence) or do away with self-assessments
Roles and Responsibilities	A. Facilities and their Parent Companies • Clarify self-assessment process. • Clarify reporting on significant business changes relevant to the Standard. B. Assurance Providers • Require independent outreach, safe spaces, anonymity, and protection against retaliation for stakeholders engaged during assurance. • Provide guidance for the inclusion of vulnerable groups and whistleblowers. • Clarify who establishes the list of stakeholders to be contacted for engagement.

Roles and Responsibilities *(cont'd.)*	• Include information on the process of continuous improvement after the audit and how stakeholders can continue to be engaged. C. The Secretariat • Define "effectiveness" in the review of effectiveness of the assurance process. • Include outreach to stakeholders and rights-holders to inform them of the opportunity to participate. D. National Panels • Clarity needed on the role of National Panels during assurance; comments seek to be better understand how panels will be formed and how they will be governed. • One comment expressed concern that a panel could be formed by a mining industry association and suggested that Extractive Industries Transparency Initiative (EITI) assume this role.
Who Can Conduct External Audits	3.1 Assurance Provider Requirements • Strengthen auditor independence and conflict-of-interest rules. • Consider firm accreditation to improve credibility and consistency. • Concern raised that too many restrictions will make assurance in smaller markets with specific language / cultural requirements, costly. • Set minimum team sizes and Subject-Matter Expert (SME) requirements; require interpreters/regional expertise; formalise training, including diversity, equity, and inclusion (DEI). • Better define roles in an assurance team including lead auditor, expert subject matter auditors, and local experts for cultural and Indigenous knowledge. 3.2 Consolidated Standard Training • Clarify how the Secretariat will ensure the authenticity of a reported grievance against the Assurance Provider. • Assurance providers accredited by national accreditation authorities, rather than internal qualification by the Secretariat, was identified by downstream and assurance provider commenters. The perception is that this will ensure a more transparent, independent, and impartial Assurance Process.
Consolidated Standard External Assurance Process	4.1 Methodology • Suggested that the diagram would be better showing an 'indicative' time frame based on maximum allowable time for each step. • The Secretariat should develop detailed guidance on how to assess individual requirements—including, at a minimum, information on what would be considered admissible evidence and in which format, and what would not. Similar guidance is available for the United Nations Guiding Principles (UNGPs). • Generating an approved final assurance report within three months of the on-site assurance engagement was noted as being unattainable because of robust review processes. 4.2 Planning • It was noted that a lot of responsibility is invested in the role of the Secretariat, who oversees the assurance process and serves under the board. There were comments on the degree of independence of the process. • Review inconsistency in the required timelines, notably between the text and the diagram • Clarify requirement for stakeholder interviews to be conducted without the physical or virtual presence of representatives of the Facility.

Consolidated Standard External Assurance Process *(cont'd.)*	• The independence of stakeholder identification for engagement during assurance was raised several times as being critical. Reliance on facility stakeholder mapping alone was not seen as sufficient, with the suggestion to allow for independent registration either with the AP or the Secretariat. • Clarify whether the Secretariat will provide materials for dissemination for communicating the grievance process. • Participation of the Secretariat, or other parties, as an observer, particularly during interviews, was seen to be problematic, and would require careful vetting and disclosure in the Assurance Plan. • Regarding the facility application process, when formulating the fee policy, Consolidated Mining Standard Initiative (CMSI) should consider adopting a fee structure based on the mine site's annual revenue to avoid excluding small and medium-sized enterprises. • It was suggested that self-assessments by the facility should be submitted to the Assurance Provider, and not the Secretariat. • Provide more information on the media scan purpose and the process in which it is to be conducted. • Clarify the definition of facility boundaries. • Review process for verification of non-applicability of a Performance Area, with the assurance provider providing objective evidence. • Clarify use of a risk-based approach. 4.3 Execution of Facility Assessment • Specify whether corrective action plans identified by assurance providers will be publicly available. • Review timeline; viewed as too compressed to allow for meaningful analysis and follow-up. • Specify frequency for assessment of corporate requirements. • Action for zero-tolerance non-conformities requires clarification, such as human rights violations. It was suggested this could be clarified by adding major and minor nonconformity definitions. 4.4 Extensions • The process for granting extensions may be too restrictive to provide a more empathetic and nuanced review of extension requests. 4.5 Reporting • Mandatory use of the reporting template may be too restrictive. Suggest the use of an addendum for additional information the assurance provider wants to include. • Comments on the level of information to be provided, with several stakeholders noting there needs to be more details including descriptions of evidence, and identification of gaps at the requirement level. 4.6 Continual Improvement Plan • Several comments focused on mandating Continual Improvement Plan to include actions to move from good to leading practice. • Specified period for corrective action may be too short. • Include application of a risk-based approach to continual improvement with the scoring mechanism adjusted accordingly. • The requirement for achieving 100 percent Good Practice Level across assurance cycles was seen as unclear. • The requirement to publish annual self-assessments along with improvement plans was seen by several respondents as excessive. • Clarify if performance level achievement could be revoked in response to an incident.

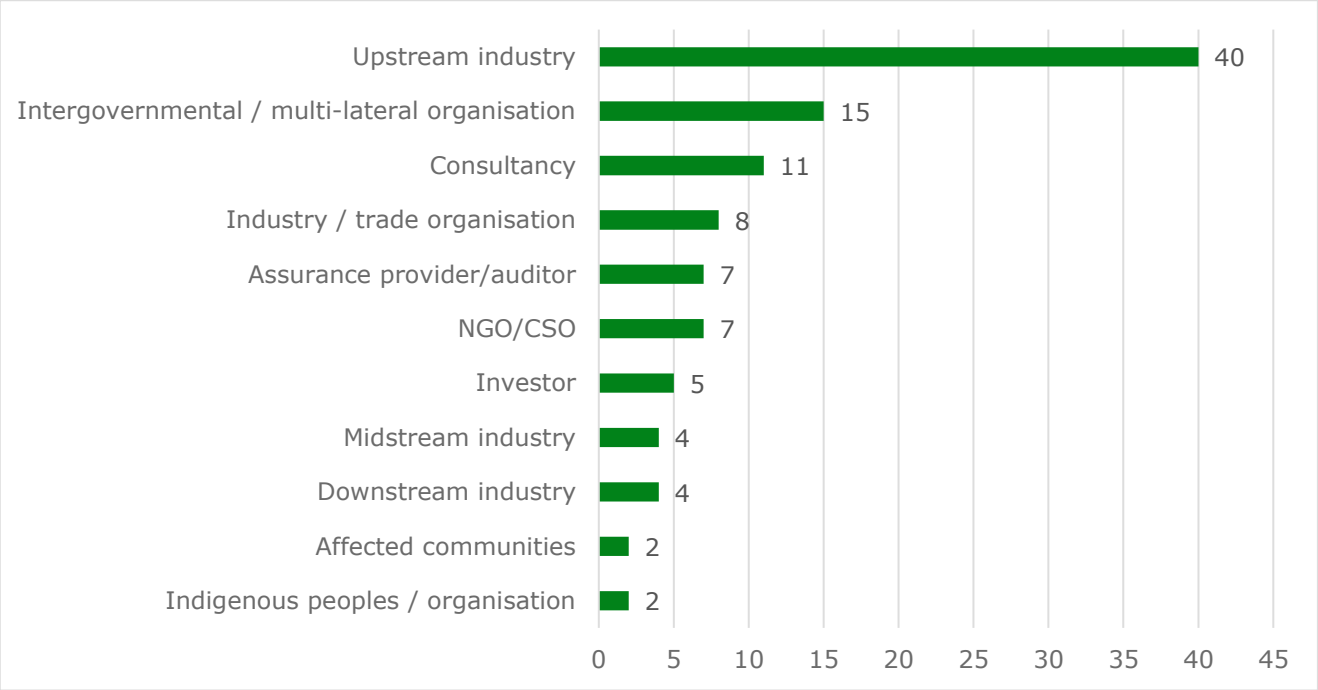
Dispute Resolution Process	• Clarify if 72-hour time frame is in reference to the interview or receiving briefing documents. • Add a time-bound limit for comments.
Public Grievance Mechanism	• Align grievance mechanism with UNGP effectiveness criteria. • Review accessibility and supported languages.
Continual Improvement	• Include a special appeals process.
Appendices	• Review inconsistencies in the Table of Activities and Deadlines for Facilities. • Feedback regarding changes to the Draft Reporting Template; consider if a technology more advanced than Excel should be employed.

6.6 CLAIMS POLICY

Stakeholders submitted 105 comments on the Claims Policy and approximately 50 percent of the comments were submitted on Section 3, Claims.

Thirty-two respondents provided feedback on the Assurance Process, including 9 upstream industry respondents and 4 NGO/CSO respondents. The highest number of comments were submitted by Upstream Industry respondents at 40 comments.

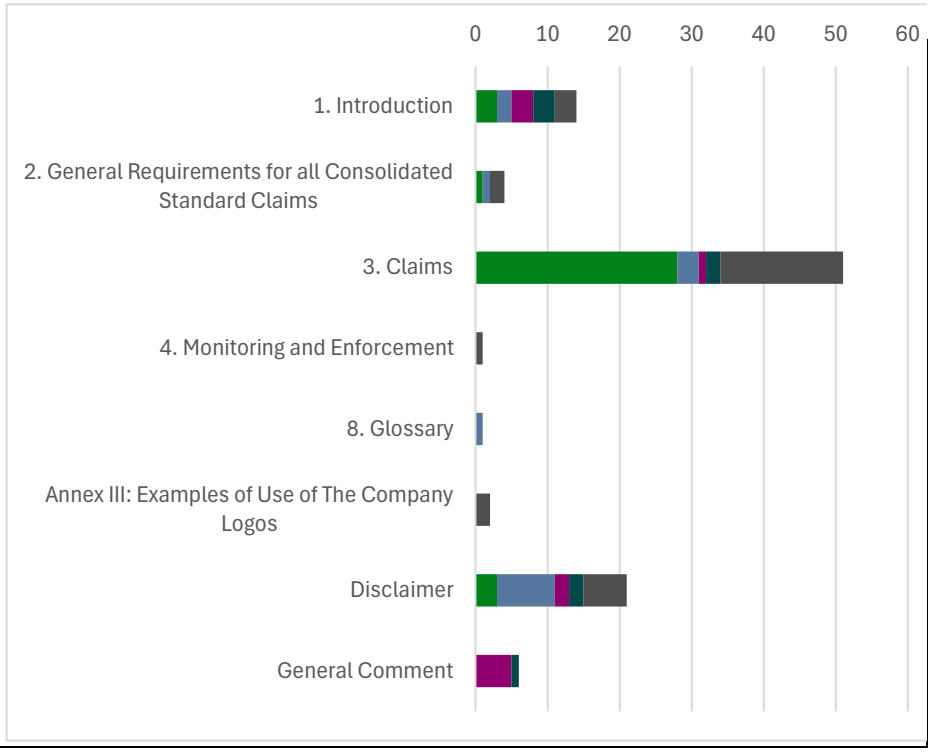
FIGURE 6-9 NUMBER OF COMMENTS BY STAKEHOLDER TYPE ON CLAIMS POLICY



Note:
NGO/CSO = nongovernmental organisation / civil society organisation

Top 5 Stakeholder Groups Providing Comments	
Upstream industry	40
Intergovernmental/ multi-lateral organisation	15
Consultancy	11
Industry/ trade organisation	8
All other types	31

Number of Comments on Performance Area Sections



Feedback Summary

- There were requests to consider incentives for achieving Leading Practice and provide a clearer distinction between claims.
- Comments were provided regarding alignment of the claims policy with emerging transparency/anti-greenwashing legislation.
- When an aggregate score is displayed, there were requests to include a description of how the aggregate score is calculated; includes Towards and Good Practice Level and does not include leading practice in the score; would not provide transparency at the sub-requirement level.
- Comments requested clarification for facility-level vs. corporate-level claims.
- There were requests to consider commodity-specific vs. a generic mark.
- Comments requested that performance-claim thresholds (e.g., 80 percent vs 100 percent) be revisited.
- There were requests to consider flexibility via time-bound corrective actions while protecting red-line areas (human rights, free, prior, and informed consent).
- Comments requested clarification for, and to limit reliance on, self-assessed scores; there were requests to ensure public claims and score updates are driven by assured results to avoid credibility gaps.
- Comments requested an explanation for how claims are monitored and enforced and added explicit anti-misuse disclaimers were also requested.
- Comments emphasized the need to publish fee schedules and clarify any fees associated with claim usage to avoid surprises.

TABLE 6-51 DETAILED FEEDBACK BY SECTION: ALL SECTIONS

All Sections	
1. Introduction	• Rename or clarify the aggregate score to reflect progress towards Good Practice only and explain how Leading Practice is represented elsewhere. • Clarify if corporate-level claims are permitted (e.g., when all facilities are assured) and define the permitted language. • Introduce visible incentives for Leading Practice (distinct claim/logo, publish leading indicators, or a 'total score' option). • Provide transparency on gaps when 100 percent Good Practice Level is not achieved.
2. General Requirements for all Consolidated Standard Claims	• Consider having the Secretariat create standard communication materials (e.g., press release templates, sample posts) to reduce the risk of misuse by companies.
3. Claims	• Adding incentives for Facilities to progress towards the Leading Practice Level; current framework of the Standard provides neither incentives nor obligations for facilities to meet the requirements of the Leading Practice Level. • Without progressive threshold 'performance claims' there lacks an incentive for companies to join until they are confident of reaching the current Performance-Claim level. This risks industry-wide uptake of the Standard, and with it, risks continual improvement by assets outside of the partner organisations. • Only relying on a percent aggregate, especially when assets are only beginning their journey with a low percentage, will result in hesitation in adopting the standards publicly, communicating performance and gaps transparently, and ultimately create another standard for only the majors. • Question on why an 80 percent threshold was chosen. 3.1 Types of Claims • Consider adding a claim that allows Facilities to demonstrate progress towards Leading Practice to generate incentive. • The public commitment was identified as potentially challenging for companies transitioning to Consolidated Mining Standard Initiative (CMSI) using a phased approach to implementation across multiple facilities. • Provide disclaimer language for assured claims to minimise the potential for misuse. • Consider renaming claims descriptors. • Clarify the disclosure of self-assessed scores during the non-assurance years. • Add examples of the aggregate score calculation to include an example with numerical scores; aggregate score calculation for Leading Practice was not provided. • Noted that the timeframes in sections 3.1.2 and 4.2.2 are different. • Achieving 100 percent conformity to maintain claims may be challenging when long-term corrective actions are necessary; Suggest a continual improvement approach above 80 percent, towards achieving 100 percent. 3.2 Self-assessed Results • Several commenters indicated a full self-assessment against the Standard would be onerous with minimum value added on an annual basis. It was unclear what sanctions could be imposed if a facility self-declares a regression in performance. • One commenter suggested a concern that self-assessed results may be used to change their claim during years between assurance.

3. Claims ***(cont'd.)***	3.3 Standard Revisions and Claims • Clarify what time frame would be applied to implement a revised standard. 3.4 Assurance Provider Claims • Clarify what risk is being mitigated by not allowing assurance providers to use the CMSI logo.
Annex II: Company Logos	• Suggested to provide examples of suitable text to prevent misleading or inconsistent claims across facilities. • Suggested to improve readability and accessibility (e.g., colour contrast, font size) in templates and visuals.

APPENDIX A CONSULTATION RESPONDENTS

CONSULTATION RESPONDENTS

First Name	Second Name	Organisation	Country
Eduardo	Altamirano Aguirre	Independiente	Chile
Sonia	Amrat-Nath	Rathbones Group	United Kingdom
Caroline	Avan	Business and Human Rights Resource Centre	France
Shane	Borchardt	Cameco	Canada
Tania	Bossi	International Platinum Group Metals Association (IPA)	Germany
Patrycja	Breskvar	UNESCO World Heritage Centre	France
Genevieve	Campbell	IUCN ARRC Task Force	Canada
Luis	Campos	SmartAccEss	United States
Denise	Capanema		Brazil
Nalori	Chakma		United States
Hugo	Costa	Wildlife Conservation Society	Portugal
giuseppe	damiano	RAPID LA Peru	United States
Suzanne	Davis-Hall	Genesg Inc	Canada
Barbara	Dischinger	IWIM	United Kingdom
Mansour	Edraki		Australia
Sian	Edwards	Indigital	Australia
Jeff	Geipel	Engineers Without Borders Canada	Canada
Daniel	Godoy Castañeda		Peru
Maria	Gutierrez	Asociacion Colombiana de Mineria	Colombia
Audrey	Hackett		United Kingdom
Pablo	Hamame	Emere Consulting	Chile
Samuel James	Hardy		Australia
Jim	Hietala	The Open Group	United States
Chelsea	Hodgkins	Public Citizen	United States
Kirsten Margrethe	Hovi	Norsk Hydro ASA	Norway
Sally	Johnson	Please Select	United Kingdom
Şenol	KARADEMİR	Q500 Engineering	Turkey
Tobias	Kluge	Round Table 103 Stockholm International	Sweden
Dave	Knight	One Planet Limited	United Kingdom
Luc	Lapointe	Capitals Hub Canada	Colombia
Johanna	Lindkvist	Boliden Mineral AB	Sweden
Janina	Mansel	Mercedes-Benz AG	Germany
Aubrey	Menard	Oxfam	United States
John	Metzger	AssetAssurance Monitoring	United States

First Name	Second Name	Organisation	Country
Dushendra	Naidoo	Minerals Council of South Africa	South Africa
Chilenye	Nwapi	The Commonwealth Secretariat	Nigeria
Sven-Roald	Nystø		Norway
Kevin	O'Callaghan	Fasken	Canada
Elvis	Okyere	Graduate NSS trainee	Ghana
Marilie	Parsons	Sibanye-Stillwater	South Africa
Duncan	Pettit	Barrick	United Kingdom
Gilcimar	Pires Cabral Oliveira	Vale Base Metals	Brazil
Robert	Pitman	NRGI	United States
Christian	puebla	Mincore	Chile
Jasmine	Puteri	Rainforest Foundation Norway	Norway
Ingrid	Putkonen	Metals for Humanity	Canada
Emily	Ritchey	T&E	Belgium
Luis	Rodríguez-Piñero Royo	Office of the UN High Commissioner for Human Rights (OHCHR)	Switzerland
Callum	Rusell	Survival International	United Kingdom
Marc	Safman	Safman Consulting	United States
ismail hakki	sarac	Q500 engineering Consultancy	Turkey
Victoria	Savelieva		Russian Federation
Manuel	Schaedler	BMZ	Germany
Eric	Schwamberger	International Cyanide Management Institute	United States
Francisca	Sepulveda	sonami	Chile
Linda	Smids	The Finnish Mining Association FinnMin	Finland
Eddie	Smyth	Intersocial	Ireland
Zoé	Spriet-Mezoued	Resource Justice Network	Algeria
Sebastian	Vetter	Aurubis AG	Germany
Mouna	Wasef	Publish What You Pay (PWYP) Indonesia/CSO Representative at EITI Indonesia MSG	Indonesia
Karen	Zuleta	8 Ideas	Chile
US Interagency Working on Mining Standards		US Federal Government, Interagency Working on Mining Standards	United States
Erica		Interfaith Center on Corporate Responsibility	United States
		Indigenous Peoples Rights International (IPRI)	Philippines
		Indigenous Peoples Statement	Multi-Country
Anonymous Respondent 1			Norway
Anonymous Respondent 2			Brazil
Anonymous Respondent 3			United States
Anonymous Respondent 4			United Kingdom

First Name	Second Name	Organisation	Country
Anonymous Respondent 5			Australia
Anonymous Respondent 6			Chile
Anonymous Respondent 7			Peru
Anonymous Respondent 8			Peru
Anonymous Respondent 9			China
Anonymous Respondent 10			Canada
Anonymous Respondent 11			Peru
Anonymous Respondent 12			Kazakhstan
Anonymous Respondent 13			South Africa
Anonymous Respondent 14			South Africa
Anonymous Respondent 15			China
Anonymous Respondent 16			Sweden
Anonymous Respondent 17			Canada
Anonymous Respondent 18			United States
Anonymous Respondent 19			Canada
Anonymous Respondent 20			Australia
Anonymous Respondent 21			China
Anonymous Respondent 22			Australia
Anonymous Respondent 23			Australia
Anonymous Respondent 24			Australia
Anonymous Respondent 25			Belgium
Anonymous Respondent 26			Switzerland
Anonymous Respondent 27			Brazil
Anonymous Respondent 28			South Africa
Anonymous Respondent 29			Brazil
Anonymous Respondent 30			Canada
Anonymous Respondent 31			Chile
Anonymous Respondent 32			South Africa
Anonymous Respondent 33			South Africa
Anonymous Respondent 34			Canada
Anonymous Respondent 35			Canada
Anonymous Respondent 36			Australia
Anonymous Respondent 37			Multi-Country
Anonymous Respondent 38			France
Anonymous Respondent 39			Switzerland
Anonymous Respondent 40			Canada
Anonymous Respondent 41			Chile
Anonymous Respondent 42			New Zealand
Anonymous Respondent 43			United Kingdom

First Name	Second Name	Organisation	Country
Anonymous Respondent 44			France
Anonymous Respondent 45			Peru
Anonymous Respondent 46			Chile
Anonymous Respondent 47			South Africa
Anonymous Respondent 48			Germany
Anonymous Respondent 49			Germany
Anonymous Respondent 50			Peru
Anonymous Respondent 51			Canada
Anonymous Respondent 52			Australia
Anonymous Respondent 53			France
Anonymous Respondent 54			South Africa
Anonymous Respondent 55			Netherlands

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