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# The Consolidated Standard Reporting & Claims Policy

Consultation Draft  
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Consolidated Mining Standard Initiative



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## The Consolidated Standard Reporting & Claims Policy

The Consolidated Standard is the trading name of the UK incorporated not-for-profit company that owns and governs the certification mark and logo trademark also known as “The Consolidated Standard.” The Consolidated Standard is a credible assurance framework to promote responsible production practices and demonstrate the industry’s commitment to the green transition.

The Consolidated Standard also retains ownership and governs and the use of existing metal specific logo marks, known as the following:

- “The Copper Mark”;
- “The Nickel Mark”;
- “The Zinc Mark”; and
- “The Molybdenum Mark”

The term “**Performance Claim**” refers to the combination of the “**the metals marks**” **listed above** together with The Consolidated Standard.

For the purposes of this Policy, reference to The Consolidated Standard-related claims shall mean claims relating to any of The Company Logos mentioned above as applicable to that metal, unless otherwise specified.

## Disclaimer

*This document does not intend to, nor does it, replace, contravene or otherwise alter the requirements of the Consolidated Standard Articles of Association or any applicable national, state or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein. The Consolidated Standard documents are updated from time to time.*

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## **1. Introduction**

### **1.1 About this Policy**

Claims are any messages, logos and imagery used to communicate that a facility meets a certain level of Consolidated Standard performance. This policy is intended to define the framework that will enable claims to be used in marketing and communications materials, annual reports, and other media by companies and their facilities that are formally participating in the standard. The framework contained in this policy is intended to cover claims resulting from both self-assessed and independently Assured Reporting.

### **1.2 Legal Compliance**

Companies and their facilities that make Consolidated Standard-related claims are each responsible for legal compliance with applicable regulations, including labelling, advertisement, consumer protection and competition laws, at all times. The Consolidated Standard cannot accept liability for any violations of law, or any infringement of third-party rights made by other organisations.

### **1.3 The Consolidated Standard and related claims**

The Consolidated Standard enables facilities to report performance data related to the standard and, when performance reaches defined thresholds, make claims to differentiate their business.

The Consolidated Standard-related claim is a claim or representation that is public-facing or used in business to business (B2B) communications, is documented, and consists of one or more of the Consolidated Standards' logo or metal marks, such as The Copper Mark, The Molybdenum Mark, The Nickel Mark or the Zinc Mark (herein referred to as "metal marks").

Consistent, accurate and appropriate use of terms related to reporting and claims based on the Consolidated Standard helps to incentivise continual improvement and build awareness, recognition and credibility.

Through this Reporting & Claims Policy, the Consolidated Standard controls all relevant rules for reporting and making claims to ensure that such claims are both credible and accurate. This means that the Consolidated Standard must grant permission for any reporting based on the standard and use of related claims prior to their being made, unless stipulated otherwise in this policy. The Consolidated Standard reserves the right to act on any use of its name or logo that it reasonably believes to be inappropriate.

### **1.4 Purpose of this Policy**

The purpose of the Consolidated Standard Reporting & Claims Policy is to set out the rules and supporting guidance for all aspects of reporting and claims. This Policy outlines the types of reporting and claims both permitted and prohibited by the Consolidated Standard. It also addresses the measures the Consolidated Standard may take to monitor reporting and claims and enforce the rules contained in this policy.

## **2. General Requirements for all Consolidated Standard-Related Reporting & Claims**

### **2.1 General**

The following rules apply to all Consolidated Standard-related reporting and claims:

- The Consolidated Standard logo and metal marks, collectively referred to as the “Performance Claims”, must be used and referred to as set out in Annex I.
- The names of the logos may not be translated into other languages without also retaining the English version/s for reference.
- The logos or their names must never be displayed in such a way that is misleading or confusing or might lead to any harm or prejudice to the reputation or credibility of the Consolidated Standard.
- The use of the logos or their names as, or as part of, another brand name is prohibited.
- The logos or their names must not be placed in such a way that they could be interpreted as belonging to any company or organisation other than the Consolidated Standard.
- The use of the logos or their names alongside other sustainability/responsible sourcing logos, marks or seals is generally permitted.

### **2.2 Logo Use Requirements**

The Consolidated Standard has developed Brand Guidelines that contains information on:

- Available logos formats;
- Minimum size of logos;
- Colours and permitted adaptations;
- Background colours;
- Exclusion zone;
- Visual examples of acceptable and incorrect uses of logo placement, size, colour etc.

Please contact the Consolidated Standard at [TO BE INSERTED IN DUE TIME] to request a copy of the Brand Guidelines or if you have any questions.

## **3. Types of Reporting & Claims**

### **3.1 Types of Reporting**

### 3.1.1 Self-Assessed Reporting

A Self-Assessed Report is a report prepared by a facility related to its self-assessed performance based on the requirements of the Consolidated Standard. This report consists of individual performance results for each of the sub-categories of the 24 Performance Areas found in the Consolidated Standard applicable to the facility.

The Self-Assessed Reporting of performance results must:

- Be published by the Consolidated Standard Secretariat on the Consolidated Standard's web page and labelled as self-assessed performance results;
- If published by the facility, be clearly labelled as self-assessed performance results, and include a link to the performance results as published on the Consolidated Standard's website.

These Self-Assessed Reports will occur annually in the years in which a facility is not subject to the assurance process. Please refer to the Consolidated Standard Assurance Process for a description of how Self-Assessed Reporting fits within the assurance process. The first Self-Assessed Report is to be submitted within 9 months of the facility's commencement date<sup>1</sup>. This report will not be published but will form the basis of the first assurance process. After the first assurance process is complete and within twelve months of the publication of the Assured Report, the facility will submit its second Self-Assessed Report to the Secretariat for review and publication, followed by a third Self-Assessed Report within the next twelve months after publication of the previous Self-Assessed Report. See Figure 1 for the full self-assessed and Assured Reporting schedule.

### 3.1.2 Assured Reporting

Like the Self-Assessed Report, the Assured Report involves the publication of the performance of the facility based on the Consolidated Standard requirements.

The difference is that the performance results have been subject to an independent assurance process using the Consolidated Standard's Assurance Process, conducted by an accredited assurance provider and published as assured results. See Annex I for the Assured Report Template.

To be able to make an Assured Report, the facility must apply through the Consolidated Standard Secretariat, implement the Consolidated Standard Assurance Process and have its independent assurance report reviewed by the Secretariat for completeness.

The Assured Report of performance results must:

- Be published by the Consolidated Standard Secretariat on the Consolidated Standard's web page and labelled as assured performance results. The results must be published alongside the assurance report produced by the assurance provider on record for the facility;
- If published by the facility, include a link to the performance results and the assurance report produced by the assurance provider as published on the

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<sup>1</sup> Commencement date – this is the date on which the facility's application to participate in the Consolidated Standard is approved and the facility's participation formally begins. This date forms the basis for the beginning of the assurance and reporting cycle for the facility.

Consolidated Standard's website.

Assured Reports will be to be published within 18 months of the facility's commencement date and within 9 months of every third anniversary of the commencement date after that. Assured Reports are expected to be complete and published within nine (9) months of each facility's commencement date and then within nine months of the anniversary of the commencement date every third year. Please refer to the Consolidated Standard Assurance Process for a description of how Assured Reporting fits within the assurance process.

**Figure 1. Overview of the Reporting Cycle**





### Example of Reporting Timeline

Based on the reporting cycle in Figure 1, a facility that has its application to participate in the Consolidated Standard on January 1<sup>st</sup>, 2026 would have the following schedule:

- January 1<sup>st</sup>, 2026 – Commencement Date
- September 30<sup>th</sup>, 2026 – First Self-Assessed Report published
- June 30<sup>th</sup>, 2027 – First Assured Report published
- June 30<sup>th</sup>, 2028 – Second Self-Assessed Report published
- June 30<sup>th</sup>, 2029 – Third Self-Assessed Report published
- September 30<sup>th</sup>, 2030 – Second Assured Report published

## 3.2 Types of Claims

### 3.2.1 Participant Claim

The Participant Claim is permitted to be used by a facility as soon as its application to participate in the Consolidated Standard has been approved. It is intended to signal that the facility has committed to participate in the formal reporting and assurance processes of the Consolidated Standard and has begun implementing the standard. It does not convey any information on the performance of the facility against the requirements of the Consolidated Standard.

A facility may continue to use the Participant Claim until its first Assured Report is published on the Consolidated Standard's website, which is within 18 months of the facility's commencement date. Prior to initiating the Assurance Process and within 9 months of the facility's commencement date, the facility must submit a self-assessment to the Secretariat, which will form the basis of the initial Assurance Process. After the Assurance Report is finalised and published, the facility will be able to progress to the Assured Claim and/or the Performance Claim as described below.

Any attempt to make use of the Participant Claim in a manner that implicitly or explicitly communicates an achievement of performance against the requirements of the Consolidated Standard is in violation of this policy.

### 3.2.2 Assured Claim

The Assured Claim builds on the Participant Claim and can be utilised by a facility as soon as the facility's first Assured Report has been published on the Consolidated Standard's website, no later than 18 months following the Commencement Date. The Assured Claim can be used to efficiently communicate to interested parties, such as customers, investors, communities and other stakeholders, that the Assurance Process has been completed and an Assured Report is available.

The Assured Claim is intended to communicate the level of performance achieved within each of the applicable Consolidated Standard Performance Areas of the Consolidated Standard.

- A facility may continue to use the Assured Claim so as long as it remains in good standing within the Consolidated Standard. This means that it must continue to:
- implement the Assurance Process and adhere to the applicable policies and procedures of the Consolidated Standard,
- continue to publish its Self-Assessed Reports in the two years between assurance cycles,
- undertake the independent assurance every third year,
- ensure its fees are paid-in-full.

### **3.2.3 Performance Claim**

The Performance Claim builds on the Assured Claim and can be sought by any facility that has undergone an independent assurance and has achieved the minimum performance threshold described below.

The Performance Claim is facility-based and intended to communicate a level of performance achieved by the facility.

Facilities that produce one or more of the minerals / metals covered by the metals marks are able to apply for one or more metals mark based on the metals they produce. For other facilities that produce metals or minerals not covered by one of the metals marks, they may apply for the Performance Claim based on the Consolidated Standard logo that does not specify a specific metal.

Qualifying for the Performance Claim and being approved to use it entitles the facility to use the respective logo as an indication of its level of performance in the standard. Performance Claims are published on the Consolidated Standard webpage and include both the facility's assured results (Assured Report) as well as the Performance Claim.

As with the Assured Claim, after a facility has earned the right to use the Performance Claim, it may continue to do so as long as it remains in good standing within the Consolidated Standard. This means that it must:

- continue to implement the Assurance Process and adhere to the applicable policies and procedures of the Consolidated Standard,
- continue to publish its Self-Assessed Reports in the two years between assurance cycles,
- continue to undertake independent assurance every third year,
- maintain its performance at a sufficient level to meet the minimum threshold for obtaining the Performance Claim, and
- ensure its fees continue to be paid-in-full.

### **3.3 Minimum Threshold for Obtaining the Performance Claim**

In order to apply to obtain the Performance Claim, a facility must meet a minimum level of performance based on the Consolidated Standard.

**CONSULTATION NOTE:** the Consolidated Mining Standard Initiative (CMSI) is seeking views through the public consultation on how to set the minimum threshold to achieve the Performance Claim. We are seeking to balance the need to set the threshold at a sufficiently high bar such that the Performance Claim is a credible claim of good practice while recognising that it is highly unlikely that any facility will maintain adherence to 100% of the requirements at the Good Practice Level 100% of the time. We are also seeking to encourage large-scale adoption of the standard and setting the threshold at a level deemed highly unlikely to be achieved, especially by small and medium size facilities, will act as a deterrent to uptake and implementation. As such, the CMSI has provided two examples of what a threshold could look like. We are looking for views on these two examples and suggestions for other examples.

**Example 1 – 80% Threshold**

To apply to obtain a Logo Claim, a facility must meet a minimum level of performance based on the Consolidated Standard. Specifically:

1. Facilities must achieve the Good Practice level of performance in 80% of the applicable Performance Areas; and
  2. Foundational Practice in the remaining applicable Performance Areas.
- 80% is based on the level of the Performance Area, not individual requirements. To count towards the 80% threshold, all requirements in a Performance Area up to and including the Good Performance Level must be met.

**Example 2 – 75%/75% Threshold**

To apply to obtain a Logo Claim, a facility must meet a minimum level of performance based on the standard. Specifically:

1. Facilities must achieve the Good Practice level of performance in 75% of the applicable Performance Areas; and
2. All remaining Performance Areas must meet Foundational Practice and 75% of the Good Practice requirements

**Additional Consultation Questions:**

In addition to seeking views on the two examples above and suggestions for other thresholds, the CMSI is also seeking views on the following questions:

- A. Beyond the types of claims and reports described above, is a more gradual on-ramp appropriate in the transition to incentivise early and rapid uptake of the Consolidated Standard and avoid companies staying out of the standard until they can meet the high bar for the Performance Claim?
- B. Within the example thresholds above, or other thresholds, should there be Performance Areas that must be at Good Practice (for example, the Tailings Management Performance Area) and/or should there be specific requirements within some of the Performance Areas that must be met in order to meet the threshold for the Performance Claim?
- C. Is there value in recognising leading practice through a higher-level claim, such as a claim that is attained when Good Practice or Leading Practice is achieved across all Performance Areas? Or, if not a higher-level claim, are there other ways to incentivise the progression from Good Practice to Leading Practice within the Consolidated Standard?

### **3.4 Assurance Provider Claims**

The Consolidated Standard encourages expressions of support and the promotion of the Consolidated Standard by accredited assurance providers in good standing. Assurance providers that are accredited and in good standing will be included in the registry of accredited assurance providers. Such assurance providers may promote their services in relation to the Consolidated Standard; however, they may not use the Consolidated Standard logo, or any of the associated metal mark logos, to demonstrate to clients, potential clients and other interested parties that they are accredited to provide assurance services on behalf of the Consolidated Standard.

## **4. Submission, Review and Approval of Reporting and Claims**

### **4.1 Assured Report**

When a facility has completed an assurance process, the Assured Report must be submitted to the Secretariat for review prior to publication and within the timelines defined in the assurance process. The Secretariat will review the Assured Report for completeness in accordance with the Consolidated Standard Assurance Framework.

If the Assured Report is deemed complete, the Secretariat will publish it on the Consolidated Standard website and communicate to the facility that it can also publish its report in accordance with the conditions defined in this Reporting and Claims Policy.

As per the Assurance Framework, the Secretariat has up to one (1) month to review the Assured Report and publish it on the website of the Consolidated Standard. If deficiencies are found, the Secretariat will return the report to both the facility and the Assurance Provider for corrective action. In such cases, the report must be re-submitted within (1) month for review by the Secretariat who will aim to review it within ten (10) business days.

### **4.2 Self-Assessed Report**

After an Assured Report has been completed for a facility, in the two reporting years before the next Assurance is due to be completed, a facility is required to provide a Self-Assessed Report to the Consolidated Standard Secretariat by no later than 12 months following the publication of the Assured Report and then another 12 months after the publication of the previous Self-Assessed Report. Once received, the Secretariat will review the Self-Assessed Report for completeness and determine that it includes:

- Updated performance results for each Performance Area that have changed since the last report
- For any Performance Area that performance results below the Good Practice Level, the identification of the applicable individual requirements that have not been met to achieve that Good Practice Level
- An Action Plan to address requirements necessary to meet the Good Practice Level

If the Self-Assessed Report is deemed complete, the Secretariat will publish it on the

Consolidated Standard website and communicate to the facility that it can also publish its report in accordance with the conditions defined in this Reporting and Claims Policy.

The Consolidated Standard secretariat will aim to review the Self-Assessed Reporting of performance results for completeness within 10 business days. If the disclosure of performance results is found to be incomplete, the Secretariat will inform the applicant of the need for corrective action. In such cases, the disclosure of performance results must be re-submitted for review by the Secretariat in a timeline that still meets the annual deadline above.

### **4.3 Performance Claim**

When a facility submits an Assurance Report to the Consolidated Standard Secretariat, if it meets the required performance threshold, it may apply to use the Performance Claim.

The facility must apply to the Secretariat to attain authorisation to use the Performance Claim. In that notification, the facility must specify whether it is applying to obtain a metals mark, such as The Copper Mark, The Molybdenum Mark, The Nickel Mark, The Zinc Mark, or, where a relevant metals mark is not in place, the Consolidated Standard Logo.

Upon receipt of an application, the Secretariat will review the submitted assurance report to ensure the appropriate performance thresholds are met and, if they are, will grant the facility the right to use the specific Performance Claim requested by the facility.

Once the Performance Claim is authorised for a facility, the facility may begin to use the relevant Performance Claim in a manner consistent with this Reporting and Claims Policy and the Branding Guidelines. The facility must submit examples of how it intends to use the Performance Claim, including for example:

- Placement on a website
- Inclusion in an e-mail footer
- Placement on a publication

The Secretariat will aim to review these examples and approve the use of the logo within 10 business days.

## **5. Monitoring and Enforcement**

It is essential that claims and reports be accurate. Claims and reports that appear absolute or imply performance levels beyond what is actually assessed or assured by the Consolidated Standard Assurance Process are not permitted.

The Secretariat will monitor the public use of claims and reports that are made improperly. In cases where a claim implies a formal association with the Consolidated Standard where none exists, resulting in misleading business or the general public, the Secretariat will take appropriate steps (including legal recourse, as needed) to protect the Consolidated Standard's intellectual property rights.

### **5.1 Monitoring Use of Claims and Reporting**

The Consolidated Standard Secretariat will implement the following strategies to monitor the use of related claims and reports:

- The Consolidated Standard Secretariat will carry out checks to monitor internet-based claims and reports and cross-check these with approved claims and reports, using internet search services.
- Interested parties can report concerns relating to the Consolidated Standard-related claims and reports, which will be investigated through the Consolidated Standard Grievance Mechanism. The Grievance Mechanism will be made accessible through the Consolidated Standard website and is overseen by the Secretariat.

## **5.2 Identified Misuse of Consolidated Standard-Related Claims and Reports**

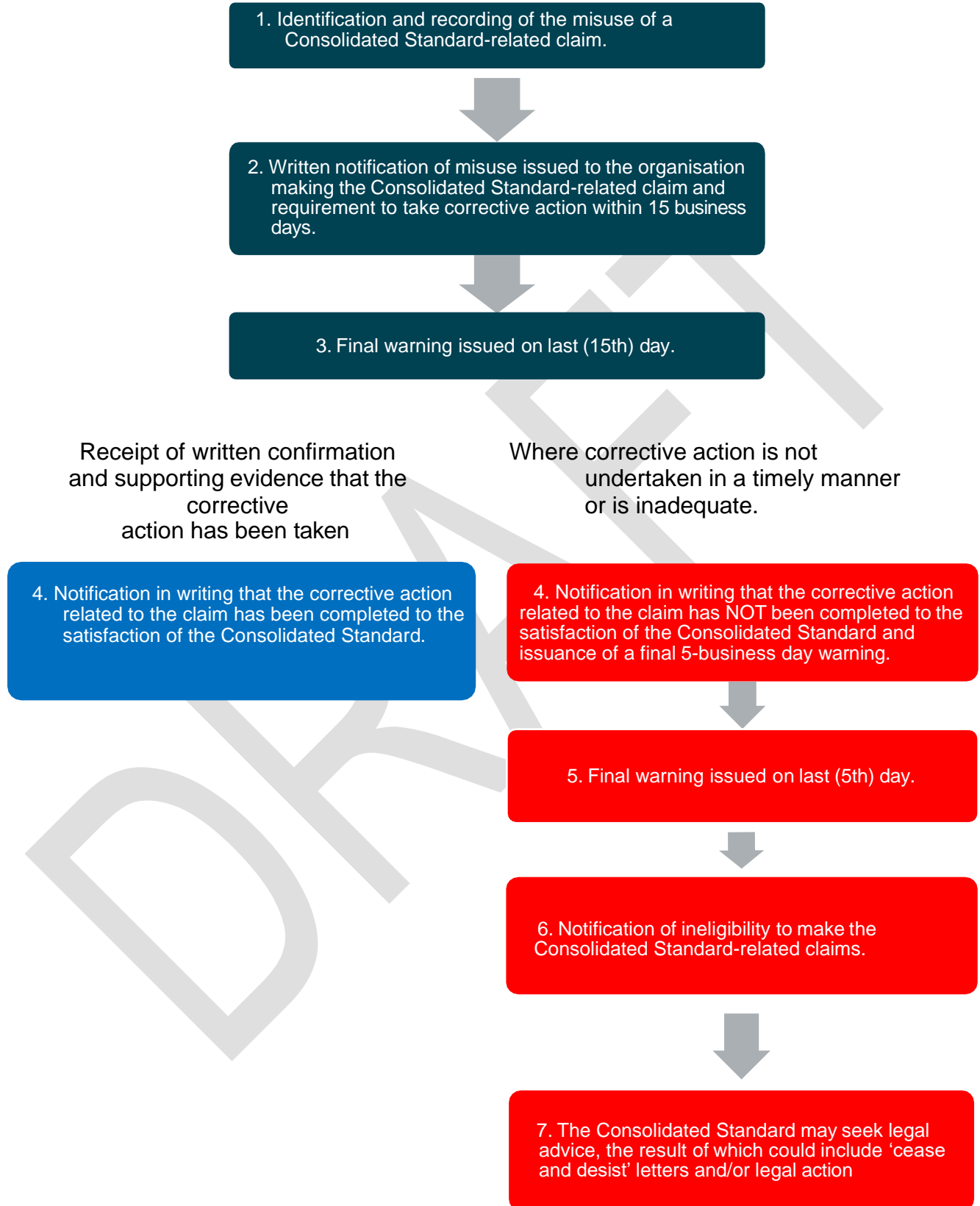
The Consolidated Standard Secretariat has the right to suspend or withdraw approval for use of Consolidated Standard-related claims and reports where there is a reasonable risk that a Consolidated Standard-related claim or report may be false, misleading or confusing or where a claim or report is being used in a manner that is not authorised by the Consolidated Standard.

Identification of potential misuse of the Consolidated Standard-related claims may be made by the Consolidated Standard Secretariat itself, by its stakeholders informing the Consolidated Standard, or through a complaint being lodged under the Consolidated Standard Grievance Mechanism.

Where instances of misuse are identified, the Secretariat will engage with the facility in question to clarify requirements for proper use, working collaboratively with the facility to modify or remove any misused reporting or claims. In cases where a facility is unwilling to respect the terms of this Reporting & Claims Policy, appropriate action will be taken to defend the registered trademarks associated with the Consolidated Standard, including possible legal action.

In cases where a participating facility is not adhering to these requirements, the Secretariat will work collaboratively with the facility in question to modify or remove any misused claims or labels. In cases where this approach is not successful, the Secretariat will engage the Board of Directors of the Consolidated Standard, which could lead to suspension or disassociation.

In cases of misuse, the Consolidated Standard will take the following steps:



## **6. Review of this Policy**

The Consolidated Standard Secretariat will continue to engage with its participants and stakeholders on the content, implementation and oversight of this Reporting and Claims Policy. This Policy will be regularly reviewed to take into account implementation experience and identify where it can be improved.

## **7. Contact the Consolidated Standard**

This Policy aims to cover the key information relating to making Consolidated Standard-related reporting and claims. The Consolidated Standard Secretariat welcomes feedback and questions, which will be used to inform future revisions of the Policy.

## **8. References**

This Policy has been developed based on the ISEAL Alliance, Sustainability Claims Good Practice Guide, Version 1.0, May 2015.

## **9. Glossary**

*To be added*









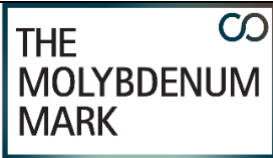
**Annex I: Assured Reporting Template**

*To be developed*

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## Annex II: The Company Logos

Name	Logo(s)	Permitted users
The Consolidated Standard Mark	To be developed	Facilities that have been assured as having meet the required performance threshold and produce products that do not align with the various metal marks listed in this Annex
The Copper Mark	 or 	Facilities that have been assured as having meet the required performance threshold and produce a saleable Copper product
The Nickel Mark	 or 	Facilities that have been assured as having meet the required performance threshold and produce a saleable Nickel product
The Zinc Mark	 or 	Facilities that have been assured as having meet the required performance threshold and produce a saleable Zinc product

<p>The Molybdenum Mark</p>	<p>    or    </p>	<p>Facilities that have been assured as having meet the required performance threshold and produce a saleable Molybdenum product</p>
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## Annex III: Branding Guidelines

*To be developed upon completion of the first public consultation. See Annex II of [The Copper Mark Claims Guide](#) for examples of what these will include.*

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## Annex IV: Examples of Use of The Company Logos

*To be developed upon completion of the first public consultation. See Annex III of [The Copper Mark Claims Guide](#) for examples of what these will include.*

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