MCEP Supporting Document 12:
Comments from Field Trial Team Leaders

Comments from Peter Southern, Managing Partner, Environmental Resources Management Australia, Team Leader for the first two MCEP Field Trials.

Thank you for the opportunity to provide my thoughts on the MCEP exercise.

My comments are based on my experience with the first two trial audits and my broader experience in the mining industry. I am very supportive of the overall objectives and the general approach that MCEP has taken. There is, of course, the usual process of refinement required to ensure that it moves from a 'good idea' to a practical tool.

First the positives:

- My view is that minesite certification (MC) has the potential to be a more effective approach to evaluating an individual site's performance than many of the approaches currently in use.
- The integration of the social, environmental, health, safety and broader 'ethical' aspects into one process provides a more comprehensive understanding of how the site addresses these aspects than any of the stand alone exercises, even where those are run back to back.
- Explicitly seeking views of external parties substantially enhances the potential credibility and value of the process by removing the inherent 'bias' of talking only with internal people.

The aspects where work is required to capture the value include:

- The need to establish value in the eyes of the participants, both companies and stakeholders to encourage all to support.
- Rationalising the links and overlaps between this process and existing systems of ISO14001, AA1000. Each of these is established and has value in its own right. The MC process needs to clearly demonstrate value over each of those.
- The difficulty in identifying and engaging with enough external (and internal at times) stakeholders to provide a reasonably representative understanding of the issues, concerns and performance of the site from a non-company perspective.
- The inevitable conflict between time and thoroughness. The balance between these needs to be resolved before initiating the MC process on a wider scale. This may be one of the more difficult issues to resolve.
- Identifying appropriate performance standards for each and every site will be time consuming and clearly, will not necessarily be agreed by all stakeholders at every site. The mechanisms within the MC process will need to be strong and unambiguous in dealing with this tension otherwise credibility will be undermined.
- The balance between systems audits and performance audits will remain a tension, but is probably not insurmountable.
- Where the site is part of a larger company, the need to include aspects from the parent company may cause confusion, however this cannot be separated from the site MC process. Clearly, some aspects would then be outside of the site's control eg internal audit processes), but essential to the sound performance of the site so need to be included.

There are numerous smaller issues in terms of getting the balance between the various components of the MC, sorting out the protocol and so on, but I would view those as procedural rather than fundamental to the success.

Overall, the key factor in success or otherwise of the MC is in demonstrating value over and above the individual programmes that currently exists. With the potential time savings, increased credibility and a better 'picture' of a site's performance, that value should be obtainable.

It was an interesting challenge to participate in the MCEP and I certainly wish success to the team.

Yours,

for Environmental Resources Management Australia Pty Ltd

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Comments from Hugh Wyndham, Associate, Manager Sydney, Golder Associates, Team Leader for the third and fourth MCEP field trials

The benefits of the MCEP Approach

In my view the MCEP approach has distinct merit and promise because it seeks to establish a process to assess and recognise measurable performance within a combination of areas of concern.

The MCEP draws heavily on the International Council on Mining and Metals principles for sustainable development as a basis and has developed a protocol covering environmental performance, occupational health and safety, industrial relations and community relations.

Unlike existing international standards, such as ISO 14001, which provide general and broad guidelines covering a range of elements that must be considered and applied in the development and implementation of a management system, the requirements of the MCEP are much more clearly defined. This is possible because it focuses on a single industry. This means that MCEP can avoid much of the variation that has been experienced in the application of International Standards. A recent strong criticism of ISO 14001 certification is the variety of audit approaches that appear to exist. Some auditors are autocratic to the extent of refusing to recommend certification unless they see what they believe the client should be doing. This appears to be a carry over from the early days of the ISO 9000 series, which were at times characterised by a slavish reliance on documentation, irrespective of its real benefits to the client.

The linking of the MCEP "criteria" that form the basis of the MCEP requirements for a mine to the ICMM sustainability principles leaves little room for argument that they are country or region centric. There may be some robust discussion across regions with respect to specific issues within the criteria, particularly where there are links to regulatory requirements. However, I believe that this can be overcome by requiring local regulatory compliance as a minimum with compliance with the MCEP requirement being the ultimate objective for the highest level of certification.

As an ISO 14001 auditor I was very encouraged by the practical nature of the criteria and the MCEP requirements. I did not identify any requirements that I would consider unreasonable. My experience includes auditing of mining operations in Indonesia, Ghana, Tanzania, Mali and Australia. Although my African experience is with mines that are either seeking certification to ISO 14001 or basing their management of environmental matters on ISO 14001, I do not believe that there is anything in the MCEP protocol that a superior mining operation should not reasonably expect to conform to.

I did not find that the coverage of Environment, Health and Safety, Employee Relations and Community Relations in the one protocol diluted the process. There will be a requirement for a team of auditors with particular specialties but I am of the opinion that this can be effectively managed.

It must be remembered that in any certification process the organization seeking certification is well aware of all the things it needs to do and be able to demonstrate to achieve certification. The audit process then is an exercise in verifying that the organisation is meeting all the requirements. There should be no surprises within the organization at any of the issues addressed by the auditors. Similarly the auditors should, rightfully, expect that the organisation is aware of all the requirements and has addressed them in accordance with the MCEP stated requirements. The need for flexibility and interpretation by the auditor should therefore be confined to particular circumstances at a particular mine, and not be associated with the MCEP requirements as a whole.

I am of the opinion that the way in which the MCEP process has been applied so far will provide a high level of transparency that is necessary for credibility. A distinct advantage that

MCEP has over, for example, ISO 14001, is that it applies to a single industry type and can therefore be much more specific in its requirements.

I am of the opinion that the approach followed by MCEP in developing performance criteria and a protocol and then testing that protocol is a reasonable and realistic approach. In my opinion, comment on the actual criteria and the specific performance requirements has been less than may have been expected. This may be because the participant mines are required to meet fairly rigid internal performance criteria. Most of the discussion that I experienced was associated with the ability of a mine to demonstrate compliance and the reasonableness of asking questions that the mine had not prepared for. I am of the opinion that in operation these issues will disappear because each mine will know well in advance what it is required to demonstrate to achieve certification. Within the audit process there will be no surprises.

What is necessary for a successful certification program

I believe that there are a number of matters that must be addressed for a successful certification program.

First the program must be transparent. MCEP I think will have no trouble meeting this requirement because the criteria are clear and based on an internationally accepted set of sustainability principles. The protocol defines for all potential participants the things that they must do to conform. However I am of the view that there must be extensive descriptive information available so that participants understand quite clearly what the minimum requirements are. As a future improvement it is quite likely that mid level and upper level requirements will also be developed. The attempt at scoring that occurred during the third and fourth trials demonstrates the need for some more clearly defined scoring guidelines. I suggest that an MCEP guideline document appended to the protocol could achieve this. It would contain a description of the requirements for meeting each criteria and examples of what is acceptable performance.

The audit process must be consistent. As previously identified a major criticism of the ISO 14001 process seems to be the variety of auditor approaches that are used and the perceived inconsistencies that arise. The qualifications for auditors must be clearly defined as must the audit approach and methodology. In order to certify a mine under the MCEP an auditor is essentially seeking evidence that the mine can demonstrate that it has applied the criteria and has acted to conform to specified requirements. Auditors will always be required to exercise objective judgement. Therefore, to maximise the consistency of application of the audit protocol, the MCEP should specify auditor training and aim to minimise the potential for divergence of application of the protocol.

The process must be defensible against external criticism. The great advantage of the MCEP Working Group is the diversity of interests represented. This means that different perspectives have been applied to the criteria in developing the MCEP protocol and will continue to be applied in establishing the certification process. It will never be possible to satisfy all interests but it is clear that there is more likely to be a productive outcome from interest groups working within the process than from simply firing criticisms externally. The working group should continue to be involved in the development and finalisation of the protocol and criteria and in developing the guidelines that will be necessary for participants. On an ongoing basis the MCEP should actively encourage the participation of interests that are external to the mining industry, with the condition that the focus be on continual improvement and movement towards common grounds.

There is a strong argument for the organisation responsible for setting the performance requirements also controlling the training and accreditation of auditors and the certification process. I see no reason why one body cannot control these three areas, as long as there is transparency of content and process. Within the existing process of certification to international standards in Australia there is an independent body (JAS ANZ) that provides accreditation to other independent bodies that are Accredited Certification Bodies, which in

turn employ auditors that are accredited by a separate independent auditor certification body (RABQSA). The Accredited Certification Bodies develop their own procedures for carrying out certification to international standards. While these are reviewed by JAS ANZ and the Accredited Certification Bodies are audited by JAS ANZ, the Accredited Certification Bodies work differently. Part of this difference may be associated with the auditors but there are also likely to be differences associated with the certification bodies. I would strongly encourage that the peak controlling body that comes out of the MCEP controls all aspects of the certification process. I have personally been exposed to anecdotal evidence of a range of auditor approaches and certification body requirements. I am of the view that auditors should be required to attend training and then be required to demonstrate that they are able to apply the MCEP protocol and criteria as designed in a consistent manner. The cost of training and qualifying to be an auditor may be an issue but I think that the potential benefits of having a properly trained pool of auditors for the project is important enough for the mining industry to support a program of training and accreditation. One approach that could be considered in assigning auditors to participant organisations is for the controlling body to provide the participant organisation with a number of accredited auditors, say three for each discipline (environmental, occupational health and safety, employee relations and community relations), that can be selected for the audit. That way the participating body knows that the auditors will be properly qualified to do the work but it is not forced to use any particular auditor. This process also gives the peak body managing the certification the capacity to rotate auditors across different organisations. There is some argument for auditors returning to the same sites as they can more easily identify improvements from a previous audit, but is offset against the benefit of having a different set of eyes. There is also the matter of the independent check that using different auditors will provide. A compromise would probably be a mix of repeat and different auditors for each certification round.

Independent oversight and auditing

The comments above covering the need for the governing body to manage the whole program may raise in some external observers the spectre of conflict of interest. However if there is sufficient involvement by external independent organisations in developing the protocol and taking part in setting the audit standards and establishing the certification process this issue should be managed. The working group or equivalent body can maintain an ongoing oversight role in making sure that the intentions of the MCEP are maintained within the certification program.

How this could mesh with other audits

One advantage of the MCEP approach is that it can provide an independent assessment of performance of a mine covering four discrete areas. Although there is overlap between the areas, each is important enough to warrant specialist auditors. By combining the four areas within one audit the number of audit days that apply at a mine may not decrease but the frequency of audits should.

It is not clear at this time what relationship ISO 14001 and (in the Australian context) AS 4801 will have to the MCEP process. Possibly a mine certified to ISO 14001 and/or AS 4801 may be able to undergo a reduced MCEP audit process. It really depends on what level of acknowledgement MCEP is prepared to offer to ISO 14001 and AS 4801.

The potential for the MCEP process to reduce the number and/or extent of audit events at a mine has probably more to do with the risk profile of the mine as assessed by corporate risk management and by insurance underwriters. Participation by representatives of these groups in the working group may have some impact in this regard.

Other comments

In my opinion the MCEP process is an excellent concept that embraces the notion of minimum acceptable performance and continual improvement. The existence of a scoring system is positive as it allows a mine to track its performance and its improvement. ISO 14001 also embraces the notion of continual improvement but as an auditor I find that identifying improvements can be quite subjective. There is heavy reliance on the auditor to assess improvement. Within the MCEP I believe the process will be more rigid and transparent.

During the trial audits there was positive feedback from auditors and suggestions for improving the protocol. In my experience they were all positive and practical and added to the protocol. There was some difficulty encountered with the scoring system but I am of the opinion that the establishment of MCEP guidelines for use by the participants and the auditors will address that effectively.

The pilot audits have I believe confirmed that the concept is sound and that there is real potential for the industry to develop a defensible, transparent process for objective assessment of mines, globally, in respect of their performance in managing their environmental impacts and issues, occupational health and safety, community relations and employee relations. I am of the opinion that the MCEP approach with an independent project manager and a working group covering a diverse range of interests is a model that could be transposed to other industries.

I would reinforce that the pilot audits were of mines that had not encountered the protocol before and that there were items in it that they were not able to demonstrate coverage of. However, we were not undertaking certification. For a proper certification, the mines would have had the guidelines available to them for many months and would also have had access to the audit protocol.

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Comments from Kurt Hammerschmid, Lead Environmental Auditor, Integrated Environmental Systems, Co-Team Leader for the fifth field trial

The Newmont Waihi MCEP Field Trial (March 2005)

The MCEP Audit Protocol that was trialled at Waihi during March 2005 was essentially an extension of a number of existing processes that the operation is subject to on an annual basis. With the exception of the disciplines of Employee Relations and Corporate Governance, the operation is already audited extensively in the disciplines of Occupational Health and Safety, Environment and Community/External Relations. As a result, considerable replication was noted and experienced between the operation's existing audit processes and the content of the MCEP Audit Protocol.

Within the auditor's knowledge, variable levels of replication would also be experienced by other Newmont operations around the world, and also potentially BHPBilliton and Rio Tinto operations (given the structure and content of their existing internal, external and corporate audit processes, especially where ISO14001 and AS4801 certification is held by an operation).

It was also acknowledged that certain aspects of the MCEP Audit Protocol extend beyond existing certification programs and also many company-specific internal/external audit protocols.

After the Newmont Waihi Field Trial, the audit team considered that the protocol has the potential to effectively be used for a third-party certification program for the resource industry. Prior to achieving this, the MCEP Audit Protocol would require some adjustments to its structure and content (as recommended in a Review of Options Report submitted to the Working Group in early June 2005; see Appendix {}).

Alignment with Other Certification Programs

In the event that the Audit Protocol is restructured as recommended in the Review of Options Report, existing third-party certification programs held by mining operations could be acknowledged under any future MCEP Certification Program.

This is likely to greatly increase the acceptance of the MCEP certification program as it will significantly reduce the potential replication between the MCEP audit protocol and external certification programs.

Performance Criteria

Standards of performance that need to be achieved for MCEP Certification need to be better defined in the MCEP Audit Protocol and could be completed as part of the final restructure and review of the audit protocol as discussed above.

Performance standards would need to be established and agreed at a regional or international level, and this is likely to attract significant debate and discussion.

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Comments from Liz Lange, Independent Consultant, Sustainability Consulting Group, Co-Team Leader for the fifth field trial

OBSERVATIONS ON THE MINING CERTIFICATION EVALUATION PROJECT

The Mining Certification and Evaluation Project (MCEP) has invited people who have been involved in the research project to provide observations about the project. I undertook the Community Relations and Employee Relations assessment at the fifth field trial in New Zealand and offer observations from this experience, and generally.

Towards a Global Standard

MCEP represents a timely and instructive research project with the field trial stage offering valuable lessons and insights on substantive and process issues. 'Timeliness' is pertinent because this project represents the first attempt to develop a universally applicable sustainability assessment framework for the mining industry. As a sector that has been at the vanguard of development issues, the move towards the creation of an internationally applicable framework is to be applauded and encouraged. It is hoped that the research project can continue beyond this initial phase and culminate, eventually, in a global standard that is widely adopted and used in the industry.

Arguments have been made for and against the achievement of this outcome. Some suggest that the diversities presented in the mining industry make it unlikely that a workable framework that is able to be applied across diverse mine sites can be achieved. A few themes, in particular, emerge here. As to the certification framework – is it possible to have a global standard which, in its substantive form, adequately incorporates the range and nature of sustainability issues, and in the process aspect, is it relevant, robust and capable of delivering the promise of assuring stakeholders of adequate mine site performance across a diverse range of operations and operating circumstances? Second, on a practical note, will the process be of value? Third, can consensus from the diversity of stakeholders interested in a certification framework be achieved?

Audit Protocols

As to the first question, the field trials have been very successful in enabling the Audit Protocol to be tested and honed, and, having tested two of the protocol sections (Community Relations and Employee Relations) in depth in New Zealand, my view is that a global standard that is relevant and applicable to any mine site is achievable. The challenge seems less to do with the range and nature of substantive principles to be incorporated into the framework, and more to do with the protocol structure and a certain level of 'wordsmithing' needed to achieve a sufficiently generic framework and language that it is able to have universal application. In this respect, the protocol sections need further structuring and refinement and the Final Report flags some of these areas.

One example is offered. With Community Relations, the Audit Protocol establishes a framework with a strong developing country flavour and incorporates assessment of mine site use of a wide range of community planning and assessment tools. This framework certainly reflects some leading development practice. If accepted and applied broadly, the MCEP framework is likely to have the roll-on effect of raising performance across the industry as well offering certification.

In the meantime, however, not all mine site operations will be able to demonstrate the use of leading development frameworks and techniques, especially those mine sites with long operating histories where community management is a relatively recent discipline. But this many not then mean that the site is not performing to an acceptable standard. That is, acceptable performance may be achieved even if it is not through the use of more modern tools and techniques. If the Mine Site Operator is otherwise able to demonstrate effective practices that meet the intent and performance outcomes sought in the process, there is a

strong argument that the protocol needs to be sufficiently flexible to consider this performance as part of the assessment process; otherwise it may appear that an assessment is too driven by technicalities.

This would involve attempting to find the right balance between having sufficiently contained assessment tools that can have universal application and that are adaptable to diverse operating circumstances, but that still offer sufficient detail and robustness in order to serve an assurance/certification function. This is not an easy balance to strike. Generally, the more detailed the standard or tool, the less generic it becomes. Every assessment will involve the exercise of discretion by the assessor. It is unlikely to be possible to be so prescriptive in the tools that the process of exercising discretion can be eliminated. The importance of having a strong principles base to refer to in the exercise of any discretion was reinforced at the trial.

Another aspect of this theme is the importance of having appropriately qualified assessors. Future stages of this research project would benefit from a detailed examination of how assessors are to be qualified, the scope of their function and boundaries or guidance for the exercise of any discretion.

Some enhancements can be made to the protocol through various structural devices and drafting styles to achieve a format that balances criteria satisfaction with diversities at site level. That is, achievement of a generic or global standard appears to relate more to structure and drafting than to acceptance around a range of substantive principles. If so, then with the exception of a couple of performance areas or themes around which debate still exists, this broad acceptance represents something of a convergence of ideas about the sustainability performance context in mining and is a very positive outcome from the MCEP process itself.

MCEP and the Global Roster of Standards

The Community Relations section of the Audit Protocol references numerous international standards and seeks to reflect the substance of these where possible. In considering how MCEP might fit into the roster of international principles, it might be a useful direction for the project to be more explicit about how and where the MCEP standard or certification scheme will fit within this roster and what it seeks to achieve that other standards do not. Significant feedback has been provided following the field trials about the interplay between ISO 14001 and MCEP. There are other standards of relevance and significance that could be similarly considered.

It is argued that an emerging global architecture of norms and standards relating to sustainable development/corporate responsibility is starting to take shape.[1] The following diagram depicts this ‘architecture’. The MCEP framework has been cross-referenced in the fourth column.

[1] E Ligteringen and S Zadek, *The Future of Corporate Responsibility Codes, Standards and Frameworks*, an Executive Briefing by The Global Reporting Initiative and Accountability, 2005.

Framework	Description	Example	MCEP Reference or Coverage
Normative Frameworks (i.e. what to do)	Provide substantive guidance on what constitutes good or acceptable levels of performance	ILO Tripartite Declaration of Principles concerning Multinational Enterprises (MNEs)	✓ No specific reference but some coverage
		UN Conventions and declarations on sustainable development issues	✓ Numerous UN instruments referenced
		UN Global Compact Principles	✓ Compact principles incorporated
		OECD Guidelines for MNEs	✓ Some principles covered
Process Guidelines (i.e. how to measure and communicate it)	Enable measurement, assurance and communication of performance	AA1000 Assurance Standard	
		GRI Sustainability Reporting Guidelines	✓ Extensive incorporation of principles
Management Systems (i.e. how to integrate it)	Provide integrated or issue specific management frameworks to guide the ongoing management of environmental and social performance	AA1000 Framework	
		ISO 14001 (specialised)	✓ Extensive incorporation of ISO 14001
		ISO Social Responsibility Guidance (proposed)	
		Social Accountability SA8000	✓ Extensive incorporation of SA8000
		Sigma	

The MCEP Audit Protocol sections currently constitute an amalgam of many of the normative frameworks, process guidelines and management systems referenced in this table, with some references made explicit in the protocol, but many not. Other standards referred to in the protocol, such as World Bank safeguard policies, fit within this architecture. Some guidelines which possibly should be referenced are not, such as the Extractive Industry Transparency Initiative (EITI). (Those mining companies now signed up to EITI represent many trillions in funds under management of the principles. If MCEP is to take shape as a framework that financial markets have regard to, it would be persuasive to be able to point to incorporation of EITI.)

Numerous commentators, many of them from the business sector, have referred to 'standards fatigue'. The New Zealand field trial threw up the issue of the extent to which the MCEP protocols duplicated large parts of ISO 14001, and to the extent that it covered the same

ground, did this represent a level of repetition or redundancy in the process? This reinforces the benefits of considering the unique position MCEP does fill within this converging framework of international principles and standards.

In cross-referencing MCEP to this illustrative 'global architecture', it is evident that the foundation is already set for MCEP to be a strong integrative standard, incorporating as it does normative principles, process and systems.

Value of MCEP to Mine Sites

This also goes to the question posed earlier – will the process be of value? If one is considering value to the mining industry, while most in the industry appear to be keenly attuned to the need to continue to improve performance across a range of areas, if the process and standard being developed by MCEP is not seen to add value to a mining operation that is not already provided by some alternative process such as ISO14001, continuing enthusiasm for adoption of the standard may be difficult to generate.

This issue, which also arose in the New Zealand trial, throws up a number of questions. One is the extent to which MCEP is a straight certification, or serves the extra function of raising performance standards. (This is accepting that by default, if a mine site strives for certification it is striving for minimum global performance standards.) In the New Zealand trial, the idea of value in the process was seen to derive from the mine site being given guidance of ways in which it could further improve its performance across a range of areas. The value of certification as a reputation benefit was understood, but given the extensive time investment involved in the assessment, interest was in practical performance outcomes for the site.

At a corporate level, one value of MCEP may lie in rationalising the plethora of standards into an integrated framework for the industry, helping to eliminate some of the 'standards fatigue' and duplication of efforts that has arisen over the years.

The question of value, and to whom, is worth exploring in detail as the project continues as this can inform the way the framework and tools take shape and the extent to which important stakeholders become engaged. For instance, if one is looking for value to the financial sector, demonstrating how MCEP incorporates EITI principles or Equator Principles may make the framework more readily acceptable to and adopted by the financial markets. Different drivers, and reasons to engage in MCEP, will exist for different stakeholders.

Multi-Sector Collaboration

A strong multi-stakeholder collaboration process has guided MCEP so far which has proven that diverse voices and interests can successfully converge. It is also worth reinforcing that the field trials have also involved the collaboration, involvement and support of many site based people and a very strong research base is being established. The support for MCEP demonstrated in the field trials, and acceptance of many of the underlying principles of MCEP, is also generating something of a mandate for going forward, which is a very positive outcome from the whole process.

Unique Features

Unique features of MCEP are worth commenting on. In an industry that has extensive experience, by and large, in environment, health and safety and increasingly community management, the inclusion of Employee Relations and Corporate Governance in the assessment framework does start to take the industry into new assessment territories. The trial confirmed the interest in including Employee Relations in the process and having the opportunity to explore employee issues beyond the bounds of health and safety related issues.

Corporate Governance was more problematic to apply at the site level, with questions arising about the interplay of corporate and mine site responsibilities for governance. International precedents such as South Africa's King II Report and the Principles for Corporate

Governance in the Commonwealth would assist MCEP to further refine a Corporate Governance framework as part of the assessment process in order to overcome some of the difficulties of application at site level experienced during the trial.

Practical Process Issues

On a practical note, the field trial confirmed a number of important process steps. Five days is about the right time allocation for an assessment. With numerous mine site staff required for participation in an assessment, it would represent a drain on mine site resources to require much more time than this. This reinforces the importance of pre-assessment preparation. For the fifth field trial, this included the preparation of an audit schedule, which was developed by working with the mine site. The schedule enabled all parties to participate in a reasonably organised process and enabled the assessment team to keep on track for the week.

The team was provided with selected site documentation prior to the visit, which was valuable in assisting the assessors to gain a picture of the site and its performance prior to the site visit. Other support tools productively used during the assessment included pro-forma employee interview guidelines and stakeholder identification tables. It is suggested that such aids can be further developed to become part of the suite of MCEP tools, as this will encourage consistency of approach in any certification process. The Community Relations section of the protocol requires employee or external stakeholder verification across many elements of the protocol. It would make for a smoother assessment process if these parts of the protocol could be provided in the form of a separate document.

From the Community Relations perspective, interviews with external stakeholders and some employees will be most usefully conducted later rather than earlier in the assessment process once the assessor has had the opportunity to start to form a view of the issues and the site performance. Selecting stakeholders for interview and organising meetings is another task that requires some preparation and needs to be undertaken well in advance of the assessment to get the best out of the process.

In due course, MCEP might wish to put together an assessment preparation manual or handbook, incorporating guidelines on preparing for an audit, together with a suite of support tools. The more consistency that is introduced at this level, the closer MCEP will move to a generic model.

The team from the fifth field trial offered many more observations to the MCEP team than those provided above which are incorporated in the Final Report, and will therefore not be repeated here.

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