Consultation response

Part 1: Your details

Original language of response: 日本語

Name: 佐藤孝之

Country of residence: Japan

Are you willing to let us publish your response publicly on the Global Tailings Review website? Yes

Please select which stakeholder group you are representing: Mining Industry

If 'Other', please specify below:

Are you responding on behalf of an organization? Yes

Please give the name of the organization: DOWA ホールディングス株式会社

Your level within the organisation: Management

Part 2: Your views on each of the Principles and Requirements in the Standard

Topic I: Knowledge Base

Principle 1

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 1 do your comments relate to?

Your comments on Principle 1

Principle 2

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 2 do your comments relate to?

Comments on the Principle itself, Requirement 2.6, Requirement 2.5

Your comments on Principle 2

・適切な法整備がなされている国においては、国内法の順守により利害関係者への配慮がカバーされていると考える。
・災害発生時の積み立て・保険制度は、安全性の向上とは無関係である。
**Topic II: Affected Communities**

**Principle 3**

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 3 do your comments relate to?

Your comments on Principle 3

**Topic III: Design, Construction, Operation and Monitoring of the Tailings Facility**

**Principle 4**

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 4 do your comments relate to?

Your comments on Principle 4

**Principle 5**

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 5 do your comments relate to?

Your comments on Principle 5

**Principle 6**

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 6 do your comments relate to?

Your comments on Principle 6:

**Principle 7**

In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?

Partially

Which aspects of Principle 7 do your comments relate to?
Your comments on Principle 7

Principle 8
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 8 do your comments relate to?

Your comments on Principle 8

Topic IV: Management and Governance

Principle 9
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 9 do your comments relate to?

Your comments on Principle 9

Principle 10
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 10 do your comments relate to?

Your comments on Principle 10:

Principle 11
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 11 do your comments relate to?

Your comments on Principle 11:

Principle 12
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 12 do your comments relate to?
Your comments on Principle 12:

Principle 13
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 13 do your comments relate to?
No

Your comments on Principle 13:

Principle 14
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 14 do your comments relate to?

Your comments on Principle 14:

Topic V: Emergency Response and Long-Term Recovery

Principle 15
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 15 do your comments relate to?

Your comments on Principle 15:

Principle 16
In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 16 do your comments relate to?

Your comments on Principle 16:

Topic VI: Public Disclosure and Access to Information

Principle 17
In your view, will compliance with this Principle and its Requirements contribute to
the prevention of catastrophic failure of tailings facilities?
Partially

Which aspects of Principle 17 do your comments relate to?

Your comments on Principle 17:

**Part 3: Your views on the Standard**

Your view as to whether the content of the Standard meets your expectations

Your view as to whether the content of the Standard meets your expectations (closed question):
2: Falls somewhat below my expectations

Please summarize why you chose this option:
・適切な法整備がなされている国においては、国内法の順守により利害関係者への配慮がカバーされていると考える。従って現在の国内管理に対してそぐわない。

Your view on whether the Standard will create a step change for the industry in the safety and security of tailings facilities

Your view on whether the Standard will create a step change for the industry in the safety and security of tailings facilities (closed question):
2: Will deliver minor improvements to the safety and security of tailings facilities

Please summarize why you chose this option:

**Does the content of the Standard address all aspects of tailings facility management adequately?**

Does the content of the Standard address all aspects of tailings facility management adequately (closed question)?
Yes

Please explain why and/or what is missing:
網羅性はあるものの、不具合、見直し点が多く含まれている。

**Part 4: Suggestions for topics to be included in the accompanying Recommendations Report**

On which topics would you expect to have further clarification or guidance in this document?

**Other information**
Non-fitting response text (text submitted which did was not in response to one of the questions above)

Attachment 1 reference (if applicable)

Attachment 2 reference (if applicable)