

Consultation response

Part 1: Your details

Original language of response: English

Name: Alvaro Paredes

Country of residence: Canada

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: Consultant (non-geotechnical)

If 'Other', please specify below:

Are you responding on behalf of an organization? No

Please give the name of the organization:

Your level within the organisation:

Part 2: Your views on each of the Principles and Requirements in the Standard Topic 1: 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?

Yes

Which aspects of Principle 1 do your comments relate to?

Requirement 1.4, Requirement 1.3

Your comments on Principle 1

Requirement 1.3. The requirement makes reference to "credible hypothetical failure modes". I think we need to make reference to internationally accepted methods that define this term for consistency in the application of the standard. A failure mode could be both credible or non-credible depending on the assumptions and scenarios considered under any failure mode assessments. Failure to provide additional guidance on this particular term could result in multiple and inconsistent interpretations that would not contribute to the prevention of dam failures. Requirement 1.4: The scope of the social & economic characterization should include the vulnerability of communities to natural hazards; to understand the baseline risk profile as well as the infrastructure and systems already in place to mitigate natural risks.

Principle 2

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

Yes

Which aspects of Principle 2 do your comments relate to?

Requirement 2.6

Your comments on Principle 2

The term "to the extent commercially reasonable" needs to be defined. As presented, the term is wide open for interpretation. Also, how would the value of the insurance be defined? Is the

intention to insure for the environmental damage and loss of human lives related to a credible failure mode? This is not clear in the text. Please clarify

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?

Yes

Which aspects of Principle 3 do your comments relate to?

Requirement 3.3, Requirement 3.2

Your comments on Principle 3

Requirement 3.2: The term "Project Affected People" needs to be explained. Do we mean the people that are affected by the residual impacts of the project or do we mean people potentially affected by the failure of the tailings storage facility; the later being a larger group of people. Please clarify Requirement 3.3: Is the intention of the guideline to contemplate resettlement as an option to mitigate risks? It can be argued that some credible failure (see previous comment on the need to define this term) would be only possible under extreme natural events which could also affect communities outside the Tailings Storage Facility (TSF) area of influence. In other words, shouldn't we analyse the "incremental risk" (i.e. risk with TSF vs risk natural without TSF) before we consider resettlement of communities; which is an extreme measure by itself with the potential to affect people in a significant way.

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?

Yes

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?

Yes

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?

Which aspects of Principle 6 do your comments relate to?

Requirement 6.1

Your comments on Principle 6:

Requirement 6.1: See previous comment regarding the need to define "credible failure mode"

Principle 7

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

Yes

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?

Yes

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?

Yes

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?

Yes

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?

Yes

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?

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:

In my opinion, the standards need to provide definition for some key terms that are being used in particular "credible failure mode" to contribute to a meaningful assessment of the risk. Without additional guidance, I am afraid the assessment of failure scenarios would be done in a very inconsistent manner by different companies, with similar situations resulting in credible or non-credible scenarios depending on who does the assessment.

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):

3: Will strengthen some but not all aspects of 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)?

No

Please explain why and/or what is missing:

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?

What is a "Credible Failure Mode"?

Other information

Non-fitting response text (text submitted which did not respond to one of the questions above)

Attachment 1 reference (if applicable)

Attachment 2 reference (if applicable)

