Consultation response

Part 1: Your details

Original language of response: English

Name: Anonymous

Country of residence: Kenya

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? 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 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? Yes

Which aspects of Principle 1 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 1

It is extremely important for the knowledge base to remain live and constantly updated as opposed to being developed at the start of the project and filed on the top shelf.

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?

Your comments on Principle 2

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?
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?
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?
Comments on the Principle itself

Your comments on Principle 5

Particular emphasis should be placed on junior / first project mining companies where internal capacity is limited, there a major urgency to commission the project before all else and funds may be in short supply.

**Principle 6**

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 6 do your comments relate to?
Comments on the Principle itself

Your comments on Principle 6:
The EOR should provide a detailed commentary on areas where site investigation data is limited. If a probability of failure is unacceptable for the risk rating of the facility then permitting should not be allowed.

**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?
Comments on the Principle itself

Your comments on Principle 7

Construction quality is the biggest risk in the early stages of a mining project - this must be very carefully monitored by the EOR and he/she must be held accountable for any shortcomings
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?
Yes

Which aspects of Principle 12 do your comments relate to?
Requirement 12.5

Your comments on Principle 12:
Very important

Principle 13
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 13 do your comments relate to?

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?

Yes

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?

Yes

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?

No

Which aspects of Principle 16 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 16:
This won’t prevent failures but it will mitigate the impact

**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?

No

Which aspects of Principle 17 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 17:
This won’t prevent failures but it will improve accountability and transparency

**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):
4: Goes somewhat beyond my expectations

Please summarize why you chose this option:
From an operators perspective, this standard is sensible and a lot more practical than what I would have expected from a UN body

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):
4: Will deliver improvements across all aspects of the safety and security of tailings facilities

Please summarize why you chose this option:
It’s a great step in formalising the whole tailings storage/risk mitigation concept and should be adopted by all mining companies building tailings facilities

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:
I believe that everything has been covered

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)