

# 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)*

