

Consultation response

Part 1: Your details

Original language of response: English

Name: Anonymous

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: 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 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?

Partially

Which aspects of Principle 1 do your comments relate to?

Requirement 1.4

Your comments on Principle 1

There is some great work that has gone into producing this document, but that work is undermined by the ridiculous notion that "at risk" groups are more susceptible to being inundated by tailings than, or at least unfairly impacted in comparison to non-at risk groups. If we allow a technical document such as this to be polluted with a politically motivated, nonsensical "requirement" such as "Special attention must be given to gender, diversity and vulnerability when identifying groups at risk" then it turns makes the document into a farce. The released tailings do not care what level of "vulnerability" the people are that are downstream. Just concentrate on making sure that the dam doesn't break which I assume is the point of the document.

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?

Requirement 2.4

Your comments on Principle 2

I don't understand the need to re-assess the social impacts of the TSF for any material change. Perhaps I misunderstand the meaning of material change in this context but I assume that the

change occurs within more or less the same footprint, or otherwise its a new TSF and would rightly require a social/economic/environmental assessment.

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?

No

Which aspects of Principle 3 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 3

Items such as grievance mechanisms and human rights assessments are not specific to any one part of a mine, they are for the entire mine. They should definitely be a part of every mining project around the world and are incredibly valuable and important. But I do not understand the value of jamming Human Rights into a document that should be solely focused on ensuring that the science, engineering and governance exist to prevent a catastrophe from occurring. In other words, for operators and mining companies to assist in making sure these tragic events never happen again, rather than trying to appeal to the political views outside the mine.

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?

Yes

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?

Requirement 7.8

Your comments on Principle 7

This is excessive in the context of a TSF. An ESMS is not a TSF-specific system, it is for the entire site. The requirement would be fine if it stated that it could be part of regular third-party audits of the site ESMS and the reporting to stakeholders could be as a part of Annual Sustainability Reporting.

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?

Requirement 9.2

Your comments on Principle 9

Is the intent to "publish" the reasons for decisions, or "publicize"? If it is publicize, where?

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?

Requirement 10.5

Your comments on Principle 10:

I assume that the succession plans that are called for in this section are related to change management. If that is the case, make that distinction clear. If it is not, then this phrase should not even be in here.

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?

Requirement 11.1, Requirement 11.2

Your comments on Principle 11:

The term "unacceptable" should be "risks that have a catastrophic or extreme consequence" in my view. I am not sure its easy to convince people that any risks are acceptable. Diluting the intent with the ESMS being audited is not a good idea. The E and the S are only really being impacted when the dam breaks so concentrate on that not happening.The TMS needs the regular internal audit and this effort should not be diluted.

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?

Comments on the Principle itself

Your comments on Principle 12:

This is very good and more like what I would like to see from the standard.

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?

Yes

Your comments on Principle 13:

I understand the intent but there is a difference between an effective reporting and getting a reward for saying something. I think that you should rethink it and just put something like ""encourage a transparent reporting culture so that personnel provide management with timely and accurate information, and that information is investigated and acted upon"" or something similar.

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?

Requirement 14.4

Your comments on Principle 14:

ALL whistleblower policies say this. Does it need emphasis here, or do you mention that there should be a whistleblower policy and then define it in the glossary including the part that states they are not to be victimized.

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?

Requirement 15.2

Your comments on Principle 15:

If by ""at risk"" you mean people downstream of the dam, then I completely agree. If you mean a specific (and ever growing) section of society, I think it is wrong.

Principle 16

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 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?

No

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:

I think that this should primarily focus on those items that ensure TSF's are safe and that the accountabilities and lines of reporting are strengthened. Adding peripheral items such as social assessments dilute the main theme, and the phrase that we must consider gender and diversity is absolutely unwanted in a document like this.

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:

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:

But to add the social part is a mistake. Focus on the things that add value instead of swaying to a political view.

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)

