

Consultation response

Part 1: Your details

Original language of response: English

Name: Anonymous

Country of residence: Kazakhstan

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?

Comments on the Principle itself, Requirement 1.3, Requirement 1.2, Requirement 1.4, Requirement 1.1

Your comments on Principle 1

Topic 1 requirement 1.1. Who decides what is the worlds best practice for obtaining such knowledge and who says how to go about that. Requirement 1.2 how often is "regularly"? Who defines this given that geology isn't likely to change during the facility life but tailings characteristics may change slightly on a weekly basis. Requirement 1.3. Should it be every time there is a raise or once a year even if nothing has materially changed? Requirement 1.4 need guidance on how this is measured, audited and followed up.

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 2.3, Requirement 2.2, Requirement 2.1, Requirement 2.6, Requirement 2.5

Your comments on Principle 2

Requirement 2.1 Without a formal chartership or recognition of the leader of these studies then I fear that because too many people don't know what they don't know then this will not lead to the desired outcomes. 2.2 Where are these ITRB going to come from? Who is going to say that they are up to a good enough standard? 2.3 as above this needs a qualified person. 2.5 this point needs to be fleshed out more. Also the lack of understanding of closure requirements across the industry is currently woefully optimistic and short term. It will mean a lot of big changes to financing of projects and will therefore affect feasibility across the whole industry. 2.6 are insurers on board with understanding the risks and mitigations well enough to provide feasible products.

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?

Requirement 3.4, Requirement 3.3, Requirement 3.2, Requirement 3.1

Your comments on Principle 3

3.1 this will mean much more detailed dam break analysis and hydro geo studies at feasibility level than are currently typical for the industry and so this needs to be articulated and factored into the cost of getting projects off of the ground. 3.2 This is fraught with difficulty. How do we decide what effects people? If there is only a 0.0001 chance of failure then is that an effect on people? People and especially uneducated people are very bad at understanding risk and technical mitigations. We know that people near a mine don't want noise or dust, don't want water pollution or to die and have their property washed away. If we can demonstrate that we have technically managed those issues to the level decided by the standard then what is the point of asking local communities about them? 3.3 this should also consider mine staff and infrastructure layouts. However I don't believe that this is necessarily necessary if we could just design and operate these facilities to the current standards of good practice. 3.4 Each mine should have this already and doesn't need to form part of a specific tailings standard.

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?

Requirement 4.1, Requirement 4.2, Requirement 4.3

Your comments on Principle 4

4.1 Rather than picking an icold or CDA criteria just say that everything has to be designed for PMF or MCE unless risk profiles allow for a 1:100 or 1:1000 but that needs to be defined better or everyone will come up with some excuse to reduce things. Another issue here is the lack of reliable and accurate climate data in most parts of the world meaning that the PMF is very hard to determine accurately. How can you extrapolate 5 years of dodgy rain data with no event length data or melt data into a PMF in a meaningful way? 4.2 So basically this decision is being left to the ITRB or reviewer. This means that they need a proper qualification or recognition because boards have no technical knowledge here and are in no place to make this decision or understand the risks presented to them. 4.3 This is not going to work. Not in its current form. No way. What is feasible in this sense? What timelines? What level of risk must things be reduced to if not to PMF/MCE?

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?

Requirement 5.5

Your comments on Principle 5

5.5 Clarification of LoM design and stages to a conceptual level with specific and updated, detailed design at each stage

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?

Comments on the Principle itself

Your comments on Principle 6:

6 This is going to require a huge education campaign of designers, operators and regulators. Most of the world doesn't know what they don't know here so these items need to be specified here in the standard and updated as technology and techniques advance but we can't leave this section open to interpretation.

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 7.2,Requirement 7.1,Requirement 7.3,Requirement 7.4,Requirement 7.7,Requirement 7.6,Requirement 7.8,Requirement 7.5

Your comments on Principle 7

7.1 How are the people to be qualified and how is their qualification assessed? It should be spelled out that a section of the design report and the operations manual must be titled "design intent" as many people can't determine what it is from the regular text of these reports. If the ESMS is to be like ISO then it'll be next to useless.
7.2 who signs off on the as built that says if it meant the design intent was met or not?
7.3 why produce a report if nothing has been built. Maybe you mean an annual maintenance report and an 'as-built' report when any raising or construction is done.
7.4 best practice needs to be spelled out and updated here. TARPS and inspections and all of the other baseline governance items need to be stated and the levels of training standardised or this will mean nothing changes.
7.5 most mining companies are so far away from this that it will be almost impossible to implement effectively.
7.6 please list actual milestones for reviews.
7.7 list courses that or educational establishments that can teach people what this is.
7.8 What qualifications? What expertise? Where do you find them?

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?

Requirement 8.1,Requirement 8.2

Your comments on Principle 8

8.1 Need guidance here on how much is good enough.
8.2 the operator and EoR should do this together with regulatory guidance on acceptable targets.

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?

No

Which aspects of Principle 9 do your comments relate to?

Requirement 9.1

Your comments on Principle 9

9.1 this means that a "tailings literate" person needs to be elevated to senior management. I think that needs to be clarified. I support it but tailings people are generally not given those positions or budgets so many companies need to realise that they need to change their structures to give tailings its independence.

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?

Requirement 10.2, Requirement 10.5

Your comments on Principle 10:

10.2 This person should not have other primary responsibilities. The tailings person needs to be tailings first. 10.5 There aren't enough of them in the world right now. There needs to be a combined drive to provide this education and qualification.

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?

Requirement 12.1, Requirement 12.5

Your comments on Principle 12:

12.1 I'd like to see lists of appropriate companies or persons developed and maintained by a central body. Also I believe that the EoR should be external to the organisation. 12.5 this will mean that all consultancies need to have comprehensive registers of their information and designs stored on file for the life of the facility.

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?

Yes

Your comments on Principle 13:

13.1 need a list of outside organisations who can provide this training or who can train the trainers. 13.2 we should avoid using individual experience as people move on too quickly.

Principle 14

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 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?

No

Which aspects of Principle 15 do your comments relate to?

Requirement 15.2

Your comments on Principle 15:

15.2 what level of risk is considered "at risk"? for instance the risk of groundwater contamination might be 1:1,000,000 but overtopping might be 1:1,000. What is the cut off for who has to be considered?

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?

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?

Requirement 17.2, Requirement 17.1, Requirement 17.3

Your comments on Principle 17:

17.1/2 What is considered relevant is highly subjective. Also Joe blogs 4 villages across can't suddenly decide to be interested and have a look through the data. Interested parties is not a reasonable criteria for access to the data. 17.3 why don't

you start by asking consultancies for their data? They have not been considered nearly enough in this standard and its development or implementation so far.

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:

This is not as good as CDA or ANCOLD and those both need a bit of extra work so we have a long way to go here.

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:

Most regulators and operators don't know what they don't know and so some will meet this and have improvements but most will think that they are adhering to the standard and will still be bad. Also national regulators won't accept it and so will stay with their existing below standard regulation holding the good companies back.

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:

Role of regulators is not addressed enough. Training and skills gaps. Technical guidance. There are too many areas with ambiguity where someone who doesn't know what they don't know (dunning kruger effect) will go off in the wrong or an inadequate direction.

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?

As outlined in my previous comments on individual topics and requirements.

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)