

# Consultation response

## *Part 1: Your details*

**Original language of response:** English

**Name:** Anonymous

**Country of residence:** United Kingdom

**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:** Investor

**If 'Other', please specify below:**

**Are you responding on behalf of an organization?** Yes

**Please give the name of the organization:** Anonymous

**Your level within the organisation:** Officer

## *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?**

**Your comments on Principle 1**

#### *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 2.1

#### **Your comments on Principle 2**

The alternative analysis should be made accessible for the local regulator(s) and affected community(-ies) to facilitate meaningful feedback collection by relevant stakeholders at the earliest possible stage of commencing the tailing facility.

## **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?**

Requirement 5.6

**Your comments on Principle 5**

The Review could and should consider post-closure responsibility for monitoring and maintenance, which is an area in which regulatory requirements across the globe differ.

### **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?**

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?**

Yes

**Which aspects of Principle 12 do your comments relate to?**

Comments on the Principle itself

**Your comments on Principle 12:**

The engineering firm should be independent of the company, including the ability to formulate and publish opinion(s) and judgement(s) without the company's pre-approval. If engineering firm is to be replaced in subsequent years, the company should disclose the rationale.

### ***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?**

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?**

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?**

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?**

Yes

**Which aspects of Principle 16 do your comments relate to?**

Requirement 16.2

**Your comments on Principle 16:**

Companies should also provide emergency support, including accommodation and financial assistance, to the affected stakeholders (including employees and communities) during the recovery process.

**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?**

Requirement 17.1

**Your comments on Principle 17:**

Due to the financial materiality of such issue, companies should disclose such information, either in form of full data disclosure or statements of critical changes of circumstances (for example, risk classification of particular facilities, grievance received and/or dealt with, recovery process after disaster), in their annual reports.

**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):**

3: Meets my expectations

**Please summarize why you chose this option:**

*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)?**

Yes

**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?**

1. What is the definition of stakeholder / affected community when it comes to financial assistance during the stages of emergency response & long term recovery;
2. What does meaningful engagement, especially when it comes to transparency of operational and monitoring data, require in the context of tailings facility;
3. What does it entail to be a good monitoring system when it comes to atmospheric and / or geological events in the context of tailings facilities;

#### ***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)***