

Consultation response

Part 1: Your details

Original language of response: Español

Name: Anonymous

Country of residence: Central African Republic

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?

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 2.2, Requirement 2.5

Your comments on Principle 2

requisito 2.2 la implementación o exigencia de una CIRR me parece excelente, pero para los proyectos de mediana o pequeña minería lo encuentro difícil de implementar debido a los tiempos en que se requieren las instalaciones de relaves operando y el costo asociado. requisito 2.5 garantía financiera, para mediana o

pequeña minería es difícil ya que exista una garantía financiera, realizar actualizaciones será aún más complejo.

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?

Not sure

Which aspects of Principle 3 do your comments relate to?

Requirement 3.3, Requirement 3.2

Your comments on Principle 3

requisito 3.2 en mediana y pequeña minería esto resultará complejo, se puede implementar gradualmente, no existen recursos ni tiempo necesarios para llevar a cabo este requisito. requisito 3.3 el término de buena fé no existe en la industria, sí no se exige claramente y se indican las consecuencias de no llevar a cabo este requisito tenga por seguro que no se realizará.

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?

Comments on the Principle itself

Your comments on Principle 4

este principio es lo ideal el sueño de toda persona responsable de la instalación de relave, pero nuevamente lo mismo, difícil de implementar en mediana y pequeña minería, la realidad de la pequeña minería es que esto generará construcciones sobre dimensionadas por ende generará mayor inversión, por lo que en la realidad será muy difícil de implementar.

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?

Requirement 6.2

Your comments on Principle 6:

ya la legislación chilena posee un decreto supremo N°248, esta norma debería complementar este decreto o bien cumplir el de más alta exigencia.

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?

Comments on the Principle itself

Your comments on Principle 10:

este requisito es lo ideal, en la gran minería existe en las grandes industrias, pero en la mediana y pequeña minería sí no se exige no existirá. Este requisito debe ser claro y debe cumplirse.

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?

Comments on the Principle itself

Your comments on Principle 11:

este requisito debe exigirse y cumplirse, en la gran minería ya existe, en la mediana y pequeña minería es difícil de implementar, debido a costos, pero sí es una exigencia de la norma se deben destinar recursos para su cumplimiento y esto lo debe entender el directorio de cada empresa.

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?

Your comments on Principle 12:

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?

Comments on the Principle itself

Your comments on Principle 14:

esto ya existe en la legislación chilena se pueden realizar quejas anónimas a Sernagemin (Servicio Nacional de Geología y Minería) ente gubernamental que fiscaliza las denuncias.

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?

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?

Partially

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):

3: Meets my expectations

Please summarize why you chose this option:

esta norma es muy parecida a la reglamentación chilena, sólo se agrega los roles claramente definidos, la divulgación pública y en general agrega aspectos en los que la regulación chilena es deficiente.

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):

5: Will deliver a step change in all aspects of the safety and security of tailings facilities

Please summarize why you chose this option:

sí la norma es exigida, por supuesto que creará un cambio radical, específicamente en la mediana y pequeña minería.

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:

respecto a la aprobación de un proyecto de relaves la norma chilena (decreto supremo N°248 de Sernageomin) es muy claro y corresponde a un listado de documentos y planos que se deben entregar para su revisión y posterior aprobación, sin embargo en los aspectos de gestión de relaves la "norma en revisión" aborda claramente aspectos que en la legislación chilena no están regulados o que el decreto supremo 248 es deficiente en lo que respecta a mantención y operación de los depósitos de relaves.

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?

en esbozar una propuesta sobre cómo se gestionará la implementación y aseguramiento.

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)