

Consultation response

Part 1: Your details

Original language of response: English

Name: Anonymous

Country of residence: Ireland

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: Consultant (geotechnical)

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?

Partially

Which aspects of Principle 1 do your comments relate to?

Requirement 1.2

Your comments on Principle 1

The requirement is too vague and will require the reference to an alternate standard i.e. minimum depth of investigation for site based on design height of facility, detailed logging, sampling and testing of underlying soils to a minimum specified depth, update of the liquefaction potential of the tailings etc..

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?

Comments on the Principle itself

Your comments on Principle 4

My preference is to remove choice of design events for the Extreme Classification - pick either the 1 in 10,000 or the PMF / MCE. There is a significant difference in the magnitude of these events and if there is a choice, then the lower bound will always be taken.

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?

No

Which aspects of Principle 6 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 6:

If this standard does not specify the minimum standard design criteria targets for stability then it is a waste of everyone's time.

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?

Requirement 12.1

Your comments on Principle 12:

The nomination of an individual rather than a company as EoR potentially places a significant level of liability on the individual. I believe it will be difficult to persuade suitably experienced individuals to take on such roles.

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?

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?

Requirement 17.1

Your comments on Principle 17:

Public disclosure of consequence classification without being mediated by the corresponding probability of failure determined from the design criteria is irresponsible. It only portrays the facility as being a hazard.

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 expected the Standard to be a complete document that would not require reference to other standards for design and operation. The absence for minimum design criteria for stability makes

this Standard largely redundant. I prefer to look at probability of failure based on design criteria as an indicator of hazard in combination with dam failure consequence classification - i.e. a High Consequence Dam with a higher probability of failure (low FoS) is a much greater risk than an Extreme Consequence Dam with a lower probability of failure (high FoS). I expected the Standard to mandate a carrot and stick approach i.e. dams adhering to the Standard and passing audits would be rewarded with a GTS badge of approval or an appropriate ranking system

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):

1: Will not improve the safety and security of tailings facilities

Please summarize why you chose this option:

If it's not a complete Standard then it will not be used by the bulk of the industry. There are several more complete Standards in existence.

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:

Explained above.

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?

Define 'design criteria that are appropriate to reduce risk for the adopted Consequence Classification'.

Other information

Non-fitting response text (text submitted which did not respond to one of the questions above)

Attachment 1 reference (if applicable)

Attachment 2 reference (if applicable)