

COMMENTS ON DRAFT GLOBAL TAILINGS STANDARD

Specific Suggestions on the Document:

Further separation in the guidance of communities merely downstream; and communities downstream within the high risk zone as verified by dam break analysis needs to occur. Not all downstream communities are potentially affected communities:

1. **Requirement 1.3:** What about facilities which do not flow such as heap leach pads? The standard hovers around only tailings facilities and silent on heap leach pads. Heap leach facilities should not be ignored;
2. **Requirement 2.3:** This should simply say "Conduct a detailed Environmental Impact Assessment (EIA) for every new TSF". Does "allow future compensation" in the commentary refer to insurance as in 2.6? If not, financial implications should be evaluated;
3. **Requirement 3.3:** This statement could potentially defeat the purpose of zone of influence assessments. What level or detail of additional measure will be deemed okay to warrant a resettlement? Even a 100mm deep inundation could lead to a total resettlement of a community. How do operators and populations at risk resolve conflict when there is disagreement on decision to mitigate risk or resettle? There have been instances where project affected people (PAP) have been adamant and insisted on relocation regardless of the measures operators have put in place;
4. **Requirement 4.1:** 'Landform status' should be in the glossary or linked to other terminology guidance. Review periods (and therefore risk) could differ between companies if left to internal classification of landform;
5. **Requirement 4.3:** Cost implications for upstream facilities to minimize risks noted here;
6. **Requirement 5.1:** Sections wording should include "suitable for the area where facility is located";
7. **Requirement 8.4:** Quarterly public disclosure for all dams not practical. Revise to annual;
8. **Requirement 15.1:** What do operators do in jurisdictions where there are no local level emergency preparedness and response infrastructure? The level of support to be provided has to be defined or limited in a way or else the operations may be forced to take up some governmental responsibilities beyond the means of the operations in some jurisdictions.

Additional suggestions to improve the output of GFWA:

- Establishment of an Independent Tailings Review Board who will review and play a significant role in tailings management decisions going forward;
- Re-classification of all TSFs based on the current environmental and socio-economic conditions in the catchment area and put in additional measures to reduce risk if deemed necessary;
- Continually re-classify the TSFs with the changing environment and socio-economic conditions within the catchment area. This may be problematic as the operations more often than not have no control on the development of communities within the area. The surrounding communities may take advantage of this and extend their development into the zones of influence in a bid to obtain resettlements or compensations. Companies will be forced under the principle to acquire bigger lease to cover possible zones of influence;
- Openly disclosing TSF development and management decisions to the public. This may also be problematic to the operations considering historical cases where people have moved in to establish various infrastructure in places

earmarked for projects all in a bid to secure compensations during the project implementation stage.

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