

# Consultation response

## Part 1: Your details

**Original language of response:** English

**Name:** Bertchen Kohrs

**Country of residence:** Namibia

**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:** Non-governmental organization (NGO) – International

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

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

**Please give the name of the organization:** Earthlife Namibia

**Your level within the organisation:** Management

## 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

#### Your comments on Principle 1

All requirements are related to my comment. Although I appreciate the survey very much, I am too old and too experienced to believe in improvement anymore. Earthlife Namibia is an NGO concerned about environmental and social justice of over 30 years and mainly concentrating on mining activities and their many impacts, I lost trust in willingness by mining companies for real improvement. We are constantly fooled by promises which are never kept, there is no transparency, they exploit the environment and the workers, and dump them once they are not fit for work anymore. The mining companies have only one thing in mind and that is money making, they are not concerned who pays the price for their wealth.

### 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?**

Comments on the Principle itself

#### Your comments on Principle 2

The tailings of an uranium mine will radiate for the next 2 000 years. How will you monitor after closure while the mining companies can't even monitor their tailings during their operations?

Please keep in mind, that workers in a country like Namibia with a 37% unemployment rate will not dare to talk about their grievances in fear of losing their job. How will you deal with corruption? Often finances set aside for closure is misused for other purposes.

## **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?**

Partially

**Which aspects of Principle 3 do your comments relate to?**

Comments on the Principle itself

**Your comments on Principle 3**

Industrial accidents are mostly a combination of technical and human failure. How can this be prevented?

## **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?**

Comments on the Principle itself

**Your comments on Principle 4**

I don't believe that a tailing facility of a uranium mine can be safely closed. To my knowledge, resettling of communities is seldom improving the standard of living for the people. In most cases they are losing out.

### **Principle 5**

**In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?**

**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?**

Partially

**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?**

Partially

**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?**

Partially

**Which aspects of Principle 8 do your comments relate to?**

Requirement 8.1

**Your comments on Principle 8**

Precondition to set up monitoring systems is that qualified and independent experts are available. I greatly doubt that this is the case in African countries.

## ***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?**

Partially

**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?**

Partially

**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?**

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?**

**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?**

Partially

**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?**

Partially

**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?**

Partially

**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?**

Comments on the Principle itself

**Your comments on Principle 17:**

Access to information is extremely important, however the public must also be able to judge the correctness of the information. They have to be educated properly in order to understand the issues.

**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 clicked at all requirements partially. In fact I find the standards are very high set. However, to my mind the human factor of failure, corruption and greediness has not been met. .

*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:**

As mentioned before, the human factor is a restriction to best practices

*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:**

see 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?**

I wonder how many responses you will receive. Has the survey been published extensively? I came across it per occasion.

**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)***

