

Consultation response

Part 1: Your details

Original language of response: English

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Country of residence: Argentina

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 (non-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 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?

Requirement 1.4, Requirement 1.1, Requirement 1.2

Your comments on Principle 1

The footnote of Requirement 1.1 regarding uncertainties related to variations due to climate change could be included in the text of the requirement. It is one of the main reasons to review and update baseline studies in EIAs nowadays. The site characterization referred to in Requirement 1.2 should also include weather and climate. Regarding Requirement 1.4, I think a clear distinction should be made between stakeholders and affected or potentially impacted population (groups most at risk). Some stakeholders could not have direct relation to the site. Stakeholders and groups most at risk play different roles in safe tailings management.

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 2.3, Requirement 2.6, Requirement 2.5

Your comments on Principle 2

Another suggested reference document regarding mitigation hierarchy is ICM's "A cross-sector guide for implementing the mitigation hierarchy", though it is focused mainly on biodiversity. The order of requirements 2.5 and 2.6 could be reversed. Requirement 2.5 is best understood after reading Requirement 2.6. In this last requirement, it is not clear whether the financial assurance mentioned for risks during the life of the mine includes provisions or insurance for the execution of the closure plan.

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?

Requirement 3.3

Your comments on Principle 3

In Requirement 3.3, where it mentions "physical and/or economic displacement of people", it should be noted that this displacement may include not only their homes but also their economic and cultural activities. A footnote could be added to this effect

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?

Requirement 4.2

Your comments on Principle 4

Requirement 4.1 addresses closed facilities. Maybe these facilities could have a separate classification, or a definition regarding safe closure. Requirement 4.2 refers to several roles in the organization that are described in further sections (Principle 10). It is a bit difficult to fully understand before understanding these roles. Maybe Principle 10 could be moved to an earlier section of the standard.

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?

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?

Requirement 7.6

Your comments on Principle 7

Requirement 7.6 is a bit broad and it is difficult to see how it can be verified.

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?

Requirement 10.4

Your comments on Principle 10:

Requirement 10.4 mentions an incentive program linked to the integrity of tailings facilities. This needs to be accompanied by the appropriate sanctions in case employees act in a way that compromises the integrity of these facilities, so that the incentive does not lead to mismanagement of risk related information which could prevent failures.

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?

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?

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?

Requirement 15.1

Your comments on Principle 15:

The ERP should be part of the EIA and the Environmental Management Plan of the mine and should be fully integrated with these two (as long as the legal framework applicable to the TSF allows for this).

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?

Yes

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):

5: Goes well beyond my expectations

Please summarize why you chose this option:

The content of the standard is very comprehensive and covers technical, environmental, social and institutional aspects of tailings governance.

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:

The standard goes across all aspects of tailings facilities and its safe management, and calls for the definition of specific roles within the mining companies, all of which are to be accountable for their actions relating each of the aspects covered in the standard. This comprehensive approach will definitely reduce risk and improve preparedness and response capacity in case an accident occurs, thus minimizing its potential consequences.

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:

As said before, the content of the standard is very comprehensive and covers technical, environmental, social and institutional aspects of tailings governance.

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?

Guidance on specific issues (such as baseline studies, best practices in design/construction/operation, mitigation measures, public participation) could be provided as independent reports (maybe one for each principle, for example). Case studies could also be useful to guide implementation.

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)