

Consultation response

Part 1: Your details

Original language of response: English

Name: Dick Dragiewicz

Country of residence: United States

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: Civil Society / Community Organization (CSO)

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?

Yes

Which aspects of Principle 1 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 1

Since tailings dams are expected to last forever they must be designed for this time frame. Mining companies appear to focus on profits versus safety so they must be required to revise their focus.

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

Your comments on Principle 2

How will this Independent Tailings Review Board be funded? Will mining/consultant companies contribute money for this funding? Or will this be an expense of mining companies?

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?

Comments on the Principle itself

Your comments on Principle 3

Small mining companies will disappear when problems arise. They'll file bankruptcy and this will require the public to fund clean up work. Financial assurance amounts must be extremely large in order to protect the environment, etc. The public must support any mining developments. If they don't then the project shouldn't be allowed to be developed.

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

All phases of a mine project should be considered Extreme and needs to focus on the safety of people and the environment. Some locations shouldn't be allowed to be developed because of environmental risks. For example, a proposed open pit/underground sulfide mine in the Michigan's Upper Peninsula (USA) would be located less than 150 feet from a major river that flows into one of the Great Lakes (Lake Michigan). The risks of this mine are too great to be allowed to be developed. Contamination of this river and the lake or likely based on the location of the mine, the inexperience of the company and its inability to generate adequate funding to protect these natural resources. Another example of a proposed mine that shouldn't be allowed is the Pebble Mine in Alaska (USA).

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?

Comments on the Principle itself

Your comments on Principle 5

The design of tailings dams is complicated and requires extensive engineering skills. However, after the tailings dam is designed the operation of it is passed on to ""workers"" with likely minimal oversight by qualified engineers. This will lead to problems and a likely disaster. In addition the costs of having a qualified engineer on site all the time wouldn't be in the best interests of the mining company's profits. So they will focus on cost savings rather than protecting the environment. For an example of this look at the tailings dams that recently collapsed in Brazil and British Columbia and other locations.

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?

Comments on the Principle itself

Your comments on Principle 6:

Due to consistent failures ""upstream style"" tailings dams should be banned. Several countries have already banned them. Why not ban them worldwide?

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?

Comments on the Principle itself

Your comments on Principle 7

Again, the mining companies will focus on profits versus safety. Local governmental bodies are generally underfunded so they won't be inspecting local tailings dam frequently. Need a method of enforcing the plan.

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?

Comments on the Principle itself

Your comments on Principle 8

The life cycle of a tailings dam is essentially forever. Who is going to monitor these dams forever? Dams need to be properly designed to protect us forever. What research is underway that could find a use for the toxic tailings? Or are tailings like the plastic debris we have that are unusable? Seems like someone should be looking for a way to use these materials.

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?

Comments on the Principle itself

Your comments on Principle 9

The idea of elevating decision making to upper levels of management is good. Even better would be to require these same decision makers to live downstream of the tailings dams. And, to make them personally financially liable for problems created by the dams.

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:

How will anyone confirm that the senior management is qualified to make these decisions. Again, it gets back to companies focusing on profits versus protection. An example of this is demonstrated by the number of mining companies that haven't responded to your request for input. These companies are afraid of costly changes.

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?

Comments on the Principle itself

Your comments on Principle 15:

This plan needs to be developed before any mine construction begins. Who is going to pay for training the local government staff? The local governmental bodies shouldn't be required to pay for this isolated training.

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?

Comments on the Principle itself

Your comments on Principle 16:

Funding will be needed for local recovery sources. This should be an expense of the mining companies.

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?

Comments on the Principle itself

Your comments on Principle 17:

Mining companies don't like to share information. For example, Aquila Resources the Canadian company that wants to build a mine in Michigan's Upper Peninsula (USA) constantly requests "private" meetings with the State of Michigan's mine permit department. They do this because they don't want the public to know what they are planning. State of Michigan has been weak and has cooperated with some of these meetings. Not good.

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:

The Standards are a good start to protect us. The difficulty will be in getting cooperation from the mining industry, funding of the extra work, and enforcement of the Standards. Enforcement may have to come from investors/insurers that deny request from the mining industry if they don't meet the proposed Standards.

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:

The Standards are a "think tank" like plan. Need to get the entire mining industry to agree to it. Unfortunately that won't happen. Enforcement will be difficult.

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:

I like the ideas proposed in the Standards. It's a starting point for better protection of people and environment. Am afraid that due to the mining industries disregard for the environment the world will be many, many contaminated sites that will affect all of us. There won't be any places to live that will be safe.

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?

Enforcement of the Standards. Financing for local government work on mining issue.

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)

