

FIMI comments on draft Global Tailings Standard

SL No.	Draft Standard	Amendment Suggested
1.	Topic-IV- Management and Governance (Page 19) Requirement 11.3: The EOR or the Designer of Record shall conduct annual tailings facility construction reviews. The EOR or independent senior technical reviewer (in the case of an internal EOR) shall conduct annual performance reviews	It is recommended that identification of deficiencies during reviews and a plan for corrective action with timelines should be framed. The progress towards completing corrective actions need to be tracked and reported.
2.	TOPIC III: Design, Construction, Operation And Monitoring Of The Tailings Facility (Page 17) Requirement 8.2: Establish performance objectives, indicators, criteria, and performance parameters and include them in the design of a monitoring program that measures performance at all stages of the tailings facility lifecycle. Record, evaluate and publish the results at appropriate frequencies. Based on the data obtained, update the monitoring program throughout the tailings facility lifecycle to confirm that it remains effective	This section should be elaborated further by mentioning standardizing the instrumentations and methods to monitor the facility such as (Vibrating Wire) VW type piezometers for pore pressure monitoring, survey monuments for measuring any displacement and satellite monitoring etc. to measure any



GOVERNANCE (Page 21) Requirement 14.3: Initiate prompt investigations of all credible employee and stakeholder complaints and grievances, swiftly resolve concerns and complaints and provide remedy as required.	te pathway to address the complaints/grievances and stakeho s should be defined along with timelines to resolve the same.
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