

1. We had expected that the standard would focus on preventing failures, so were somewhat surprised to find it more focused on E&S aspects of remedial outcomes. We believe there would be greatest value in a preventative standard for siting, design and construction which in turn can lead to the prevention of catastrophic failures and significant impacts;
2. We believe significant further work is needed to make the language of the standard clear and unambiguous. In its current format it leaves too many issues subject to interpretation;
3. We believe that the impact assessment of potential failure should run in parallel and be an essential part of the planning and design process; and
4. We support the expectation that boards should take more responsibility on key issues and decisions.

Fine to publish our feedback as long as its clear that this does not constitute an endorsement of the product.