

Consultation response

Part 1: Your details

Original language of response: Español

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Country of residence: Central African Republic

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: Multilateral Organization (e.g. UNECE, World Bank)

If 'Other', please specify below:

Are you responding on behalf of an organization? Yes

Please give the name of the organization: Corporación Alta Ley

Your level within the organisation: Officer

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?

Requirement 1.1, Requirement 1.2

Your comments on Principle 1

se requiere establecer ciertos patrones, criterios y periodos mínimos de actualización diferentes para aquellos Relaves que se encuentran en las fases de cierre y relaves que cambien sus estados de operación inactivo a activo o activo a inactivo

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 2.4, Requirement 2.2, Requirement 2.1

Your comments on Principle 2

REQUISITO 2.1: Llevar a cabo un análisis de alternativas formal y multicriterio de todos los sitios de emplazamiento y tecnologías factibles para la gestión de relaves, se debe dar lineamientos también a depósitos en operación que no fueron objeto de un proceso de alternativas o en caso de haberlo sido lineamientos para la divulgación de esta información. REQUISITO 2.2: se sugiere definir que se entiende "sin conflictos de intereses" para este estándar. 2.4: definir "un cambio importante la instalación de relaves" para efectos de este estándar.

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?

Requirement 3.2

Your comments on Principle 3

manera significativa a las personas afectadas por el proyecto (PAP), ¿se refiere a que el proceso de consultas y respuestas son vinculantes a la obtención del cumplimiento del estándar?

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?

Requirement 4.1, Requirement 4.2, Requirement 4.3

Your comments on Principle 4

considerando los últimos eventos mundiales con graves consecuencias a la salud y medio ambiente se asocian a instalaciones inactivas o en proceso de cierre se sugiere extender este estándar a las instalaciones ya en operación o en proceso de cierre. además se sugiere aclarar sobre que base se debe aplicar la Matriz de Clasificación por Consecuencias para estas instalaciones y como se aborda los cambios de estado en las fases de operación, Por ejemplo, calculo de la distancia peligrosa en relación al coronamiento final del muro de la instalación de relaves. u otro lineamiento

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?

Requirement 5.1

Your comments on Principle 5

¿como se demostrarán que se realizaron estas evaluaciones, en las instalaciones existentes?

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?

Partially

Which aspects of Principle 7 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 7

solo en el principio 7.1 se menciona la fase de cierre "cerrar las instalaciones de relaves de acuerdo a la intencionalidad del diseño", dado que es una fase crítica de potenciales desvíos respecto del diseño de cierre, se sugiere incluir es ta fase de forma explicita en el requisito 7.2 y 7.3

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?

Partially

Which aspects of Principle 9 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 9

cual sera el rol,de ICMM en la gestión y gobernanza de este tipo de instalaciones (supervisara, tendrá un sistema de reporte global?)

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?

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?

Requirement 11.4

Your comments on Principle 11:

el plazo cada 3 a 10 años, parece un poco holgado se debería plantear a un máximo de 5 años

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?

Yes

Your comments on Principle 13:

el requisito 13,5 debiese ser el primer principio y asegurar que su alcance este en línea con los KPI de producción y operación del tranque para toda la Operación o compañía segun corresponda

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?

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?

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?

Partially

Which aspects of Principle 17 do your comments relate to?

Comments on the Principle itself, Requirement 17.1, Requirement 17.3

Your comments on Principle 17:

se sugiere al ICMM abordar en una línea de trabajo paralela que tiene relación con los pasivos ambientales y relaves sin dueño para fortalecimiento de la confianza en la actual iniciativa y gestión de la huella minera mundial

REQUISITO 17.1: instalación de relaves y la clasificación por consecuencias, se debiese aplicar a Instalación de relaves existentes y Nuevas

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):

3: Meets my expectations

Please summarize why you chose this option:

Se debe avanzar en la gestión de los relaves existentes, en proceso de cierre e inactivos, es este aspecto la Norma tiene opciones concretas que podría extender a instalaciones en estas etapas

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:

las nuevas instalaciones tendrán un mejor estándar de operación, de forma adicional se debe fortalecer el trabajo en las instalaciones que están actualmente en operación y en fase de cierre e inactivas, hay ciertos principios de la norma que abordan esta temática pero se debe reforzar el enfoque de que el cierre es una parte de la operación de las instalaciones de relaves y el cumplimiento de los criterios de diseño en esta fase es relevante para evitar incidentes

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:

los pasivos ambientales o relaves sin dueño no son abordados los efectos del cambio climático en los factores de seguridad de los tranques (se plantea a modo de incertidumbres en torno al cambio climático), se sugiere llevar a modelos de cambio climático en los estándares de diseño, construcción operación y cierre de una Instalación de relaves

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?

para fortalecimiento de la industria minera mundial se sugiere incorporar de forma mas clara en algunos principios las instalaciones que están en fase de cierre e inactivas , ademas fortalecer los medios de comunicación de riesgo, acá una

oportunidad real al GTR, o similar (por ejemplo ranking, procesos de clasificación, cambio de estado de instalaciones entre otros) se recomienda una plataforma mundial de transparencia de los datos a fin de fortalecer la confianza de la sociedad civil e inversores en la industria minera

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)