

# Consultation response

## Part 1: Your details

**Original language of response:** English

**Name:** Karin Tynelius

**Country of residence:** France

**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 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?**

Partially

**Which aspects of Principle 1 do your comments relate to?**

**Your comments on Principle 1**

#### Principle 2

**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 2 do your comments relate to?**

Requirement 2.5

**Your comments on Principle 2**

I believe having the insurance companies involved is one of the best ways to minimise risks of tailings facility failures. If it costs more for the company to insure the facility than to manage it properly, that is a good motivation. Also, an insurance company that has agreed to insure a facility should have to pay for any failure, even if there is non-compliance with procedures for the management of the TSF. That will turn the insurance company into good watch-dogs.

### 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?**

**Your comments on Principle 3**

### ***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

**Your comments on Principle 4**

This entails that no construction, or installation of other activities, can be built in a designated area that must remain a no-go zone after the TSF has been built to avoid that the classification of high-very high-extreme changes independently of the industrial installations. The company should have the right to land ownership (against compensation if necessary), or if public land, that the state reinforces the exclusion zone.

#### ***Principle 5***

**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 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?**

Partially

**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?**

**Your comments on Principle 7**

#### ***Principle 8***

**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 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?**

No

**Which aspects of Principle 9 do your comments relate to?**

Comments on the Principle itself

### **Your comments on Principle 9**

Decision making must be done on the most COMPETENT level, not on the highest hierarchical level. The banker and the lawyer on the board might not be the most competent. Elevating the decisional level is a blame-game, not an act that will minimise accidents. The important thing is not to have a scape goat, but to have no failures.

### ***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?**

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?**

Yes

**Your comments on Principle 13:**

Best practice peer reviews and exchanges would not only improve everybody's way of working, but also motivate employees and thereby enhance safety. Insurance companies should refuse to insure a TSF if the company does not participate in peer reviews and best practice exchanges. Safety is everybody's problem, it gives mining a bad reputation, not only the company that experiences an accident. There could also be exchanges with other industries using similar ponds (sedimentation ponds in chemical industries etc)

**Principle 14**

**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 14 do your comments relate to?**

Comments on the Principle itself

**Your comments on Principle 14:**

There has to be not only formal written complaints, but open meetings, where grievances can be heard.

**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?**

No

**Which aspects of Principle 15 do your comments relate to?**

Comments on the Principle itself

**Your comments on Principle 15:**

The objective of an emergency response is not to prevent catastrophic failures (hence my "no" answer), it is to limit the consequences a failure

**Principle 16**

**In your view, will compliance with this Principle and its Requirements contribute to the prevention of catastrophic failure of tailings facilities?**

Not sure

**Which aspects of Principle 16 do your comments relate to?**

Comments on the Principle itself

**Your comments on Principle 16:**

As for the previous question, the objective of preparing for long term recovery is not the prevention of catastrophic failures. However, making sure the economic consequences are known in advance should have a beneficial effect on wanting to prevent failures.

## **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):**

3: Meets my expectations

**Please summarize why you chose this option:**

I expected this to be a good document, based on expert advice.

**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):**

2: Will deliver minor improvements to the safety and security of tailings facilities

**Please summarize why you chose this option:**

Big international companies that work compliance regarding ethics and anti-corruption, and that have the financial strength already follow these guidelines. It will be difficult for smaller miners that don't have the staff neither the competence nor money, to implement it. Less scrupulous companies in ""weak"" jurisdictions might just ignore it. Exchanges for best practices and training could bring the biggest improvements.

**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:**

Artisanal mining is important in some regions, and although there is not likely to be huge dams at such facilities, there might be toxic substances that could spill over and affect water reservoirs (ground water, rivers...). People and livelihoods that are influenced by artisanal mining, which in developing countries can be life sustaining for 1,000nds of people living in poverty, also have the right to protection. How will that be financed?

### **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?**

International law Review of global mining codes and the compatibility with the recommendations, will it be redundant in some countries, or not even up to national standards in others?

**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)*

