

# Consultation response

## Part 1: Your details

**Original language of response:** English

**Name:** Mark Slater

**Country of residence:** Canada

**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:** Mining Industry

**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?**

Comments on the Principle itself

#### Your comments on Principle 1

The principal itself is sound in that routinely updating studies will help create more awareness on the performance of the facility; however, preventing failure will require acceptance of this knowledge from the accountable executive to ensure sound practices and resources are applied to managing the facility. It seems that poor management practices or ignoring the signs the facility tells you is more directly linked to dam failures, rather than a lack of appreciable knowledge

### 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?**

Your comments on Principle 2

## 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?**

Yes

**Which aspects of Principle 4 do your comments relate to?**

Requirement 4.1

**Your comments on Principle 4**

More detail is required on the rebuttle process, notably 4.1(b) as it is difficult to read and seems that it will be up to the discretion of the EoR to assign a classification (as is currently done using the CDA guidelines)

#### ***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**

This principle is likely the most important as it pertains to the design which strongly influences the facilities' performance. It's unclear as to the intent of the order of the principles within the document - it doesn't seem that they are ordered in terms of importance, but potentially that's something to consider for a future update?

#### ***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?**

Yes

**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?**

Yes

**Which aspects of Principle 8 do your comments relate to?**

Requirement 8.1

**Your comments on Principle 8**

Appreciate the lack of prescribing details on monitoring programs for the facilities - they need to be derived based on applicable risks to the facility and against credible failure modes.

## **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?**

**Your comments on Principle 9**

### **Principle 10**

**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 10 do your comments relate to?**

Requirement 10.2

**Your comments on Principle 10:**

I'm not certain it will be easily accepted that the EoR can have regular communication with the Accountable Executive. Some companies have multiple facilities and multiple EoRs that would have to report through to this Exec. beyond normal communicable means. While I certainly support this initiative, I'm struggling to see how effectively this can be done.

### **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?**

No

**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?**

Partially

**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

**Your comments on Principle 17:**

Public disclosure is tricky as pertinent documents (e.g. DSI) can be useful to illustrate current management practices on dam safety; however, sharing of monitoring data, informed long term plans, inundation studies, etc. can easily lead to fear mongering within downstream communities and the public at large, casting those in a tailings management role into a negatively understood position. 17.2 suggests reasonable requests for information should be responded to and I would suggest that is applied to 17.1 or the general principle as well

**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:**

The standard follows generally principles that are already in place (for my organization and regulatory requirements). The details included will definitely help elevate the global management of tailings facilities. The only question I have is how this is to role out and be invoked on a state wide or global standard - will it be up to regions or state to mandate it's acceptance or voluntary to individual organizations to implement and follow?

***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 principles are good / sound practice to follow; however, it typically comes down to safe management of a facility to ensure that it continues to be safe. Typical shortcuts to resourcing or minor risk taking typically occurs within multiple organizations, usually due to those in the RTFE role who do not have appropriate seniority to drive safe tailings management. The Accountable Executive designation may change that; however, I believe that's going to create a significant work load to implement and may not be well accepted.

***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:**

Yes, but some additional guidance on safe, risk based, operational decisions should be included - e.g. operational decisions around step changes in a plant, or significant maintenance works, should be scheduled and implemented based on risk based scheduling and not occurring or planned during higher risk periods (i.e. freshet or flood / typhoon season)

**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?**

Guidance on community / COI engagement - how to develop, implement and routinely interpret feedback

### **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)*

