

Consultation response

Part 1: Your details

Original language of response: English

Name: Prince Kwaku Denyo

Country of residence: Ghana

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 (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?

Yes

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?

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?

Yes

Which aspects of Principle 3 do your comments relate to?

Requirement 3.2

Your comments on Principle 3

Throughout the tailings facility lifecycle, as part of the periodic review and audit of the tailings facilities, it should be required of reviewers to have consultation with PAP downstream and/or within the catchment of the facilities. By this approach any observations of anomalies or defects seen by the PAP no matter how minor (which operators in a way may miss) can be pointed out and evaluated by the experts.

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?

Your comments on Principle 4

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?

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?

Yes

Which aspects of Principle 6 do your comments relate to?

Requirement 6.3

Your comments on Principle 6:

As part of stability analysis of facilities in operation instead of relying on data and properties of construction materials it should be ensured that materials in-situ (especially portions of soil properties of embankment) should be analysed again for the determination of the factors of safety. This might be more accurate and reliable than using material properties analysed prior to the design and ,construction of the facilities.

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?

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?

Yes

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?

Yes

Which aspects of Principle 10 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 10:

Irrespective of the owners organisations structure, there should be a standard management structure that states the responsibilities of the facilities. Just as Mining planing Management Hierarchy, which does not so much differ from company to company, there should also be a minimum TSF management hierarchy that is solely responsible and accountable for the management of the TSF right from design, construction, operation and monitoring to ensure that guidelines are followed to the letter.

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?

Requirement 11.2

Your comments on Principle 11:

There should be minimum standard requirement for checklists and indicators used in the audit and review of the facilities.

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?

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?

Yes

Which aspects of Principle 17 do your comments relate to?

Requirement 17.1

Your comments on Principle 17:

It will be useful and educative to publish finding from facilities involved in failure incidents.

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 meets your expectations mainly because it covers every aspects that pertains to the safety of tailings storage facilities and this standards will go a long way to safeguard of the environment and social rights of PAP and all stakeholders.

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):

5: Will deliver a step change in all aspects of the safety and security of tailings facilities

Please summarize why you chose this option:

The Standard will create a step change for the industry in the safety and security of tailings facilities in the sense that if the outlines of this standard are followed it will ensure that not only the host communities of these facilities are safe but villages and cities miles are secured and safe.

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:

I would suggest that the guideline provides what is expected of auditors in the review of the TSFs. This will ensure that triggers are not overlooked during period and routine audits.

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?

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)

