

# Consultation response

## *Part 1: Your details*

**Original language of response:** English

**Name:** W. Eberhard Falck

**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?**

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?**

**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?**

**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?**

**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?**

Requirement 7.2

### **Your comments on Principle 7**

A main concern is that 'as built' is not necessarily 'as designed'. In practice, contractors or even employees may circumvent QM procedures for personal gains (e.g. bribery) delivering substandard materials or taking short-cuts in construction. I feel that the standard should be more specific on mechanisms to prevent such occurrences. This is particularly relevant for areas with low governance and trust indices. Measures could include frequent on-site controls, but also emphasis on developing a compelling safety culture and group spirit within the company.

### **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?**

Requirement 10.4

**Your comments on Principle 10:**

There is a strong link to Requirement 7.2. See my comments there.

### **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 11.2

**Your comments on Principle 11:**

An external construction supervisor (as there used to be in shipbuilding in the old days), who ensures the quality of materials used and the execution as planned at the operational level would be useful.

**Principle 12**

**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 12 do your comments relate to?**

Requirement 12.3

**Your comments on Principle 12:**

See my comments on Requirement 11.2. The EOR may still be too removed from the day-to-day on site operation.

**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:**

It may be useful to have also a look at what is being done on the topic of 'safety culture' in nuclear power plant operation/nuclear safety, where behavioural patterns that compromise safety are studied and in turn patterns that increase safety are sought to be instilled.

**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?**

**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:**

It pulls together the management measures that are needed to establish safe TMFs.

***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):**

4: Will deliver improvements across all aspects of the safety and security of tailings facilities

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

It spells out clearly responsibilities and chains fo responsibilities.

*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:**

#### ***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?**

Some language could be more generic, i.e. 'dotted line responsibilities' may not be a term understood by people not familiar with corporate organigramms. I feel that some form of implementation document would be needed, that goes deeper into how this standard actually should be applied. This may need to be country or region specific - I would assume that the supporting documents mentioned above address these issues ?

#### ***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)***