

Consultation response

Part 1: Your details

Original language of response: 中文（简体中文）

Name: Zhou Hanmin

Country of residence: China

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: Academic (universities and other research institutes)

If 'Other', please specify below:

Are you responding on behalf of an organization? Yes

Please give the name of the organization: BGRIMM&CHINCOLD

Your level within the organisation: Management

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 1.4, Requirement 1.3

Your comments on Principle 1

关于尾矿库溃坝风险预防及潜在溃坝风险可能对下游社区造成的影响，在中国规范里面要求：下游 1Km 范围内，禁止有任何人员活动场所和重要工业设施；对库容超过 1000 万立方米或坝高超过 60m 的尾矿库，要求在设计审查阶段必须论证可能的溃坝对下游的影响范围，可以采用数值模拟方式或物理模型模拟方式，对于特别大型或场地敏感区域，要求同时采用两种方式进行论证。希望本规范能够参考。

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 2.2

Your comments on Principle 2

建议建立全球独立审查委员会 (ITRB) 大名单，成员应涵盖全球各主要矿业国家及专业技术能力强的组织和个人，并定期对成员进行评估和更新。

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?

Not sure

Which aspects of Principle 4 do your comments relate to?

Comments on the Principle itself

Your comments on Principle 4

在中国，如果新建尾矿库的下游环境属于这一类，规范中则不允许建设。如果是已经正在运行的尾矿库，下游存在分类表中“极端”的情况，则进行升级改造并通过审查方可继续运行，否则必须进行闭库。

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?

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?

Comments on the Principle itself

Your comments on Principle 9

我参加了 ICOLD 委员会中讨论这个表格，我个人认为这个表格中的参数评估，很难准确的在设计阶段进行评估，而且这个评估的公正性也很难得到保证。里面还设计到经济损失，不同的国家或地区，计量标准差异也很大。另外，每一个分类里面涉及到 6 个指标，如果某一个项目的 6 个指标中，对应于不同的分类（低-极端），那么最后以哪一个分类为最终的尾矿库风险类别？是否按照最严重的那个指标确定类别？

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?

Requirement 11.1, Requirement 11.4, Requirement 11.5

Your comments on Principle 11:

在中国, 要求每 3 年进行一次尾矿库的风险评估, 如果有必要, 可以补充工程地质和水文地质勘查, 并补充必要的尾矿物理力学性质试验, 作为尾矿坝稳定性分析的依据; 对于 11.5, 不建议采用单人完成高级独立审查, 建议至少 3 人

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?

Comments on the Principle itself

Your comments on Principle 12:

这一条在中国比较难推广, 中国的责任体系划分不一样

Principle 13

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 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?

Partially

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?

Not sure

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?

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):

2: Falls somewhat below my expectations

Please summarize why you chose this option:

审查的技术部分缺乏依据，独立审查员的知识认知也不一样，全球主要矿业国家的实践差异较大，因此本标准在执行过程中会遇到与所在国或地区的现有规范之间的不一致或冲突

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:

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:

对于尾矿库的运行期管理没有更多细致要求，根据中国经验，设计缺陷的概率相对较低（前提是有足够知识和经验的设计人员进行设计），尾矿库溃坝最主要是因为运行期间的不规范操作造成的

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?

在中国，对于复杂的尾矿库，在设计之前，还需要足够多的技术论证环节，比如：场地岩土工程勘察、环境影响评价、安全预评价、尾矿坝静动力稳定性分析、溃坝影响范围分析等等，这些前期工作都需要委托不同的技术机构合作。中国对尾矿库的监测监控也有专门的标准要求。

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)