

Date: March 10, 2021 6:28 AM

Submitted By: Aidan Davy

Submitted on Behalf of: ICMM

Dear Ekaterina,

Thank you for providing the opportunity to provide feedback during the public comment period on the updates to SASB's Metals & Mining and Coal Operations standards, which reflects expanded coverage of the risks associated with management of tailings storage facilities. We note that the public comment draft states "SASB has engaged multiple times with the working group participants and individuals involved in developing the GISTM, including ICMM and PRI, to seek alignment among all efforts". Based upon our review, we see demonstrable evidence that you have faithfully pursued strong alignment, as reflected in the disclosure topics and accounting metrics.

Our only observation of possible misalignment relates to *EM-MM-540a.3. Summary of the emergency preparedness and response plan (EPRP) for tailings storage facilities.*

2 The entity shall disclose its approach to ensuring the effectiveness of the EPRP at the site-specific level

2.1 Disclosure shall include, but be not limited to:

2.1.1 The entity's approach to development of site-specific emergency response plans;

2.1.2 The entity's approach to **training the workforce and educating the potentially affected communities on the risks of a failure**, if probability of such is determined by an annual technical tailings facility performance review; and

2.1.3 The entity's frequency of emergency response plan tests and evacuation exercises to minimize consequences of a potential failure.

This differs somewhat from Requirement 13.1 of the Standard that requires operators to "Meaningfully engage with employees and contractors to inform the EPRP, and co-develop community-focused emergency preparedness measures with project-affected people" and 13.3 that requires operators to "take all reasonable steps to maintain a shared state of readiness for tailings facility credible flow failure scenarios by securing resources and carrying out annual training and exercises".

It is reasonable to assume that the education of affected communities on risk of failures is either a pre-condition of or implicit in the co-development of emergency preparedness measures with project-affected people. However, we would encourage SASB to consider updating 2.1.2 to reflect language that more closely aligns with the extracts from 13.1 and 13.3 noted above.

Many thanks,

Aidan