**FINNISH TOWARDS SUSTAINABLE MINING (TSM) STANDARD**

**ASSESSMENT PROTOCOL**

# A Tool for Assessing Tailings Management Performance

## Introduction

This document provides a tool for assisting companies in the facility-level assessment of their current standard of tailings and other deposits management generated in process in the mining area. The level of tailings management performance is monitored using five performance indicators in accordance with this assessment tool. It enables key performance indicators to be segregated, and performance improvements for each indicator to be tracked from year to year. The use of this protocol also enhances the consistency of tailings management performance assessments conducted across companies. In addition, the tool has been designed to enable the external verification of company performance.

## Assessing Tailings Management Implementation

The companies recognise the risk posed by tailings facilities, and the importance of ensuring environmentally responsible management.

***What is a tailings facility?***

*A tailings facility “includes the collective structures, components and equipment pertaining to tailings (and other deposits generated in process) impoundment and management, including dams and reservoirs, other related facilities and appurtenances.”*

The purpose of the assessment protocol is to provide guidance – based on performance indicators – to companies in their planning and implementation of tailings management.

The assessment should:

* assist companies in developing their capacity to monitor and improve their performance
* provide a basis for the related auditing.

Professional judgement is required when assessing the management system. The application of the assessment protocol of the Finnish TSM standard requires that the assessor have sufficient expertise in the practice of tailings management and management systems assessment. When carrying out an assessment, account must be taken of cooperation between the employer and employees. The assessment protocol of the Finnish TSM standard is not, in itself, a guarantee of the effectiveness of tailings management activities, but can be used to measure performance levels. A self-assessment checklist is attached to the document (Appendix 2).

## Performance Indicators

Five performance indicators have been established for tailings management:

1. Tailings management policy and commitment
2. Tailings management system
3. Assigned accountability and responsibility for tailings management
4. Annual tailings management review
5. OMS manual

Five levels of performance are identified for each indicator. Assessment criteria are used to further define performance at each level. The assessor must evaluate whether the company or the performance of the site/facility meets the assessment criteria for the performance indicators, by answering the questions presented in the self-assessment checklist. A base assumption is made that all companies are in compliance with all legal and regulatory requirements.

Specific assessment criteria for each performance indicator are provided in subsequent tables, to enable the assessor to determine an appropriate level of performance (Levels C-AAA). When conducting the assessment, assessors should note that the five indicators complement one another. The performance level is determined by the fulfilment of the requirements of the criteria.

Wherever a performance element or performance indicator is irrelevant, the assessment given should be N/A. For each indicator, only one level can be reached, which is determined by the lowest level that meets the requirements. All criteria at that level and below must be met. The overall level of the Tailings Management is determined by the lowest level achieved.

**The goal of each company is to achieve an “A” ranking at a minimum and to work towards continuous improvement.**

The tailings management protocol is primarily intended for companies in operation or in the project design phase (e.g. a profitability study under way).

## Facility-level Assessments

Companies are expected to complete an assessment and report on the performance indicators for tailings management for each distinct site or facility. When planning the assessment, account must be taken of the organisational structure of mining operators, as companies may categorise their facilities and define their sites in various ways. This assessment protocol focuses on companies operating in Finland and their sites and facilities, in particular.

Facility-level reporting has been found to be the most reliable, informative and useful approach to performance evaluation.

## Assessment Process

It is recommended that the assessment include interviews, discussions and document reviews. The assessment must include the management, as well as production and specialist personnel representing the site or facility. A level of expertise in auditing and management systems assessment and some knowledge and experience of tailings management is required. For each performance indicator, only one level can be reached if all criteria for that level and all preceding levels have been met. No partial levels of performance (e.g. B+) can be reported.

Where an operation is shared between two parties, e.g. a joint venture, the two parties are encouraged to discuss who should complete the assessment, and whether it should be undertaken jointly or divided up so that the results reflect the appropriate activities of each company.

**Structure of the Assessment Protocol**

For each performance indicator, the assessment protocol provides:

* a statement of purpose that expresses the spirit and intent of the indicator
* assessment criteria for each level of performance (C-AAA)
* supporting guidelines to help the assessor understand the general scope of each indicator and to act as a framework for reviewing documentation and conducting interviews necessary for the assessment of the company’s or facility’s performance
* Frequently Asked Questions (FAQs) that provide further information, such as definitions of key terms and answers to more commonly asked questions.

## PERFORMANCE INDICATOR 1

## TAILINGS MANAGEMENT POLICY AND COMMITMENT

## Purpose:

To confirm that companies have established a policy and commitment that express intention, commitments and principles in relation to tailings management.

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| **Performance Indicator 1****Tailings Management Policy and Commitment** **ASSESSMENT CRITERIA** |
| **Level** | **Criteria** |
| **C** | Activities meet the requirements set in Finnish legislation. No documented tailings management policy and commitment developed.Policy and commitment assumed to be covered by overall site management operational guidelines, but these do not specifically address tailings management. |
| **B** | Tailings management policy in place, but not in conformance with the Finnish TSM Tailings Management Framework, or the policy is under preparation.  |
| **A** | Policy and commitment in place, endorsed by senior management, and has been taken into account also in resourcing. The policy is communicated to employees. Employees and contractors involved to the tailings management understand their roles and responsibilities. Internal audit to ensure that the Tailings Management Policy and Commitment are in conformance with the Finnish TSM Tailings Management Framework and endorsed by senior management. |
| **AA** | External independent audit to ensure that the requirements of Level A are met. |
| **AAA** | The external audit, as outlined in Level AA, also involves an evaluation of the effectiveness of the policy, commitments and their implementation. |

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| **Tailings Management Policy and Commitment** **FREQUENTLY ASKED QUESTIONS** |
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| [1](#_bookmark32)1 | [What does "independent" mean?](#_bookmark33) | [See page](#_bookmark32) 16 |
| 12 | What does “accountability” mean? | See page 16 |
| 13 | What does “responsibility” mean? | See page 16 |
| Tailings Management Policy and Commitment SUPPORTING GUIDELINES FOR THE ASSESSORThrough interviews and the review of documentation, clarify the following issues:* That the company has established and maintains a tailings management policy in conformance with the Finnish TSM Tailings Management Framework.
* That the policy and the commitment accurately reflect the existing commitments and views of senior management regarding expected tailings management performance.
* That the policy and commitment is communicated to employees.
* That managers, employees and contractors involved to the tailings management appear to be familiar with the policy and the commitment and understand their roles and responsibilities.
* implemented, as demonstrated by the allocation of budget and resources.
* How management and employee awareness of the policy is maintained over time, and the specific means employed.
* That the policy establishes an ongoing programme for the review and continual improvement of tailings management.
* What audit or assessment processes are in place to ensure that the policy and the operational guidelines are in conformance with the Finnish TSM Tailings Management Framework.
* Whether an internal or external audit of the tailings management policy and the commitment has been carried out within the last three years.
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### PERFORMANCE INDICATOR 2

### TAILINGS MANAGEMENT SYSTEM

### Purpose:

To confirm that companies have a tailings management system in conformance with the guidance[[1]](#footnote-1) to provide a systematic structure for the assessment of risks, setting of goals and objectives, consultation with communities of interest, implementing activities to achieve goals, assignment of responsibilities, and assurance processes.

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| **Performance Indicator 2****Tailings Management System****ASSESSMENT CRITERIA** |
| **Level** | **Criteria** |
| **C** | Activities meet the requirements set in Finnish legislation. No formal tailings management system developed or implemented. |
| **B** | Tailings management system implemented but not in conformance with the guidance1 available, or the existing practices for the tailings facility are not in conformance with the guidance. |
| **A** | Tailings management system, in conformance with the guidance1, developed in consultation with key communities of interest, and implemented.Internal audit to ensure that the implementation of tailings management system is in conformance with the guidance1. |
| **AA** | External independent audit to ensure that the implementation of tailings management system is in conformance with the guidance1. |
| **AAA** | The external audit, as outlined in Level AA, also involves an evaluation of the effectiveness of the tailings management system implementation and continual improvement of practices. |

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| Tailings Management System FREQUENTLY ASKED QUESTIONS |
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| Tailings Management System SUPPORTING GUIDELINES FOR THE ASSESSORThrough interviews and the review of documentation, clarify the following issues:* That a tailings management system is in place that is in conformance with the guidance1.
* That there has been consultation with key communities of interest on developing the tailings management system.
* What audit processes are in place to ensure that the tailings management system is in conformance with the guidance1.
* Whether an internal or external audit of the tailings management system has been carried out within the last three years.
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### PERFORMANCE INDICATOR 3

### ASSIGNED ACCOUNTABILITY AND RESPONSIBILITY FOR TAILINGS MANAGEMENT

### Purpose:

To confirm that executive accountability for tailings management has been clearly assigned and to signal that the appropriate management of tailings facilities is important to the company’s business and reputation. This indicator confirms that companies have an executive officer who has overall accountability for ensuring that an appropriate management structure is in place for responsible tailings management. It is expected that the executive officer will delegate responsibility for tailings management, budgetary issues and other tailings-related functions to production and/or corporate personnel, while retaining ultimate accountability for the management of tailings and the related outcomes.

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| **Performance Indicator 3****Assigned Accountability and Responsibility for Tailings Management** **ASSESSMENT CRITERIA**  |
| **Level** | **Criteria** |
| **C** | No formal assignment of accountability to an executive officer. However, responsibility for tailings-related issues and performance has been delegated in accordance with section 6 of the Decree on waste from extractive industries, section 115 of the Environmental Protection Act and section 141 of the Waste Act. |
| **B** | An executive officer has been formally assigned accountable for tailings management. No formal delegation of responsibility for tailings-related issues and performance. |
| **A** | Internal audit to ensure that:accountability for tailings management has been formally assigned to the executive officer responsibility, budgetary authority and accountability for the implementation of, and reporting on, the tailings management system in conformance with the guidance[[2]](#footnote-2) formally delegated to production and/or corporate personnel. |
| **AA** | External independent audit to ensure: the assignment of responsibilities and accountability to the executive officerresponsibility, budgetary authority and accountability for the implementation of, and reporting on, the tailings management system in conformance with the guidance2 formally delegated to production and/or corporate personnel. |
| **AAA** | The external audit for Level AA included an evaluation of the effectiveness of the implementation of accountability and delegation of responsibilities. |

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| Assigned Accountability and Responsibility for Tailings Management FREQUENTLY ASKED QUESTIONS |
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| Assigned Accountability and Responsibility for Tailings Management SUPPORTING GUIDELINES FOR THE ASSESSORThrough interviews and the review of documentation, clarify the following issues:* That an executive officer has been assigned specific accountability for tailings management.
* That the accountable executive officer has formally delegated responsibility for tailings management, budgetary issues and other tailings-related functions to production and/or corporate personnel.
* What audit processes are in place at the facility to ensure that tailings management accountability and responsibilities have been assigned and are clearly defined and that sufficient resources are available in conformance with the guidance2.
* Whether an internal or external audit of the assigned accountability and responsibility for tailings management has been carried out within the last three years.

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### PERFORMANCE INDICATOR 4

### ANNUAL TAILINGS MANAGEMENT REVIEW

### Purpose:

To confirm that there is an annual corporate review of tailings management that is reported to the accountable executive officer to ensure that the corporation is satisfied that the tailings management structure and systems are effective and continue to meet the needs of the organisation.

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| **Performance Indicator 4****Annual Tailings Management Review** **ASSESSMENT CRITERIA** |
| **Level** | **Criteria** |
| **C** | Activities meet the requirements set in Finnish legislation. No formal, annual corporate review of tailings management. |
| **B** | Annual corporate review of tailings management is not reported to the accountable executive officer. Periodic formal reviews of the tailings management system and performance at facility level in conformance with the guidance[[3]](#footnote-3). |
| **A** | An internal audit to ensure: * that the annual corporate review of tailings management is reported to the accountable executive officer; and
* that the review is in conformance with the guide4.
 |
| **AA** | An external independent audit to ensure: * that the annual corporate review of tailings management is reported to the accountable executive officer; and
* that the review is in conformance with the guide4.
 |
| **AAA** | The external audit for Level AA includes an evaluation of the effectiveness of the annual tailings management reviews. |

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| Annual Tailings Management Review FREQUENTLY ASKED QUESTIONS |
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| Annual Tailings Management Review SUPPORTING GUIDELINES FOR THE ASSESSORThrough interviews and the review of documentation, clarify the following issues:* That the company performs an annual corporate review of tailings management.
* That the results of the review are reported to the accountable executive officer.
* That the process employed for the annual corporate review of tailings management addresses the requirements of the guide3.
* That the annual corporate review of tailings management reported to the accountable executive officer has been subject to an internal or external audit within the last three years.
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### PERFORMANCE INDICATOR 5

### OMS MANUAL

**Purpose:**

To confirm that the facility has developed and implemented a tailings OMS manual in conformance with the guidance[[4]](#footnote-4).

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| **Performance Indicator 5****OMS Manual** **ASSESSMENT CRITERIA** |
| **Level** | **Criteria** |
| **C** | Activities meet the requirements set in Finnish legislation. No OMS manual developed. However, tailings facility operation, maintenance and surveillance activities are carried out in accordance with legislative requirements. |
| **B** | OMS manual or similar has been developed, but it is not in conformance with guidance4. Roles and responsibilities for facility personnel defined and documented. Development on OMS manual is underway. |
| **A** | OMS manual developed and implemented in conformance with the guidance4. Emergency preparedness and response plans documented.A formal internal audit to ensure that the contents and implementation of the OMS manual are in conformance with the guide4. |
| **AA** | Emergency preparedness and response plans tested and practiced regularly.External independent audit to ensure that the contents and implementation of the OMS manual are in conformance with the guidance4. |
| **AAA** | External audit as outlined in Level AA also involves an evaluation of the effectiveness of the OMS Manual. |

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| **OMS Manual****FREQUENTLY ASKED QUESTIONS** |
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| **OMS Manual****SUPPORTING GUIDELINES FOR THE ASSESSOR** Through interviews and the review of documentation, clarify the following issues:* That an OMS manual has been prepared and implemented.
* That the OMS manual is in conformance with the guidance4*.*
* That the roles and responsibilities of facility personnel are defined.
* That the facility has audit processes in place to ensure that the requirements of its OMS manual are being followed, that action plans are executed to address any deficiencies.
* Whether an internal or external audit of the OMS manual’s conformance with the guide4 has been carried out within the last three years.
* That emergency preparedness and response plans are prepared, documented and tested.
 |

# APPENDIX 1:

# Assessing Tailings Management Performance

# FREQUENTLY ASKED QUESTIONS

|  |  |  |
| --- | --- | --- |
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##

## Does a “tailings management policy” have to be a stand-alone document?

No. The requirement for a specific tailings policy can be met within an overarching corporate policy or environmental policy if that policy contains specific reference to tailings management.

## Can corporate documentation be used to demonstrate commitment?

A written senior management commitment at corporate level (e.g. a corporate policy) can be accepted as evidence during a corporate and/or facility-level self-assessment or verification of the Finnish TSM standard, if accompanied by evidence that the corporate commitment is being applied and adhered to at facility level. There must be evidence of a link between the corporate documentation and facility-level practices. If such a linkage is established, corporate documentation can be accepted as evidence of a facility-level commitment.

## What does COI consultation mean?

Consultation is a process by which a company communicates with communities of interest in order to understand their viewpoint(s), to inform them of company activities and performance, and to actively engage them in discussion and participation on any issues of concern.

The stakeholder identification and consultation process are described in more detail in the Community Outreach Assessment Protocol. Examples of communities of interests are listed in question 8.

## Can a facility effectively implement a tailings management system without having a tailings management policy in place?

No. There is a direct linkage between Performance Indicators 1 and 2 of this protocol. A facility must have a tailings management policy in place in order to effectively implement a tailings management system, since the policy provides direction and is part of the management system. A facility cannot achieve Level A for Performance Indicator 2 (Tailings Management System) if it has not achieved Level A or higher for Performance Indicator 1 (Tailings Management Policy and Operational Guidelines).

## What does “audit” mean?

An audit is a systematic and documented independent assessment of whether the requirements for the subject of the audit have been met. The findings and conclusions of the audit are based only on the evidence. Audits are voluntary but required to reach A - AAA levels.

Internal audit (level A) is conducted by a person or group, which may consist of the company’s employees, but which must be independent, impartial, and objective with respect to the management of the tailings facility being audited. External audit (levels AA and AAA) is conducted by an independent, impartial and objective person or group, such as an independent consultant. Audits are valid for three (3) years.

Audit should not be confused with the verification system, which is largely a desk-top exercise in which the TSM rating self-assigned by a facility or company against a given performance indicator is verified. The TSM verification is not equivalent to an audit of tailings facility management as outlined in the preceding paragraph.

## Can a company or facility achieve a Level of AA/AAA upon the satisfactory completion of an external audit or assessment, without having completed a Level A internal audit or assessment?

Yes, because the performance indicator assessment is a snapshot in time of a company’s or facility’s status as it relates to each specific performance indicator. Assigning a rating of Level A or AA/AAA is based on whether an audit or assessment is internal or external. A company or facility does not need to do an internal audit or assessment (qualifying for a rating of Level A) before receiving a rating of Level AA/AAA for an external audit or assessment.

## What if a company or facility audit indicates non-conformance with the assessment criteria?

If the audit or assessment identifies a significant non-conformance, a rating of Level B should be assigned. Some examples of significant non-conformance might include lack of or inadequate:

* documentation of key aspects;
* COI consultation;
* policy and operational guidelines;
* assignment of accountability and responsibility for tailings management;
* an annual corporate review of tailings management.

Professional judgement must be applied when assessing the significance of identified non-conformances.

#### DEFINITION OF KEY TERMS

## What is a community of interest (COI)?

Communities of interest include all individuals and groups who have an interest in, or believe they may be affected by, decisions relating to operational management. They include, but are not restricted to:

* employees
* neighbours
* landowners
* recreational users of the affected area
* the Sámi (the village meeting of the Skolt Sámi in the Skolt Sámi area)
* reindeer herding co-operatives and reindeer herders
* mining community members
* suppliers
* representatives of other livelihoods
* customers
* contractors
* environmental organisations and other non-governmental organisations
* governments, authorities
* the financial community, and
* shareholders.

## What does “evaluation of the effectiveness” mean?

An evaluation of effectiveness goes beyond determining whether a condition has been met.

Performance results and trends that should be evaluated to determine the effectiveness of tailings management include:

* the extent to which performance objectives and indicators have been achieved;
* the extent to which planned activities have been implemented as intended;
* fulfilment of conformance obligations;
* non-conformities and corrective actions;
* surveillance results;
* adequacy of resources to support achievement of performance objectives;
* feedback from practitioners and end users; and
* feedback from COI’s (eg. employees and neighbours).

The system is effective once the objectives set for the management of tailings have been achieved.

## What is a “system”?

A “system”, or “management system”, represents processes that collectively provide a systematic framework for ensuring that tasks are performed correctly, consistently and effectively in order to achieve specified objectives and drive continual improvement in performance. A systems approach requires an assessment of what needs to be done, planning in order to achieve the set objectives, the implementation of the plan, and a review of performance in meeting the objectives. A management system also considers the necessary personnel and resource requirements and how the documentation required for the system’s implementation will be created. The documentation covers all types of documentation (paper documents, intranet documents, electronic documents, etc.). Not all practices need to be documented. Within any system, processes and activities are usually given a certain status through clear and precise requirements that are documented as a written procedure, for example. This means that the company can clearly and easily demonstrate that the process or system in question is in place. This would also typically require documented processes or an “audit trail”.

Other definitions associated with systems are:

* Commitment: The formal expression of the management’s commitment to a particular set of issues that presents the stance of the company with respect to interested external parties. A commitment can be expressed as part of the operational principles or policy of a company.
* Practice: Informal, undocumented approaches to carrying out a task.
* Procedure: A formalised, documented description of how a task is to be carried out.

## What does “independent” mean?

An audit or assessment conducted by inspectors who are external to the activity being audited or assessed and who are free from bias and conflicts of interest. An external audit or assessment must be conducted by inspector who are also external to the company being audited or assessed. Inspectors maintain an objective state of mind throughout the auditing process, to ensure that findings and conclusions are based solely on the evidence presented.

## What does “accountability” mean?

The management system defines the accountable party. Management is the party that is ultimately answerable for tailings management and for the development and implementation of the tailings management system within the facility. Such accountability cannot be delegated. Resources are available to the accountable party to ensure that the proper systems (training, equipment, communications, etc.) are in place for effectively meeting the goals.

## What does “responsibility” mean?

Within the tailings management system, specific tailings management related requirements and tasks are identified and assigned to specific positions within the facility. It is important that responsibilities are clearly communicated so that the person in each position understands what is expected of him or her.

# APPENDIX 2: SELF-ASSESSMENT CHECKLIST

***Tailings Management***

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| --- | --- | --- | --- |
| **Facility/****Site:** |  | **Company:** |  |
| **Assessed by:** |  | **Date submitted:** |  |

|  |
| --- |
| **SUPPORTING DOCUMENTATION/EVIDENCE:** |
| **NAME OF DOCUMENT** | **LOCATION** |
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| --- | --- | --- |
|  | **Interviewees:** |  |
|  | **NAME** | **POSITION** | **NAME** | **POSITION** |  |
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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 1: TAILINGS MANAGEMENT POLICY AND COMMITMENT**  |
| **Indicator 1****Level B** | Are a tailings management policy and commitment in place, or are they being developed? |  |  |  |  |
| *If you have answered “Yes” to the Level B question, continue to the Level A questions. If you have not answered “Yes” to the Level B question, the facility is a Level C facility.* |
| **Indicator 1** **Level A** | Is there a tailings management policy and commitment in place? |  |  |  |  |
| Is the policy and commitment endorsed by senior management? |  |  |  |  |
| Has the policy and commitment been taken into account in resourcing? |  |  |  |  |
| Is the policy communicated to employees? Do employees, contractors and consultants whose activities may affect tailings management, understand their roles and responsibilities? |  |  |  |  |
| Has an internal audit been conducted and determined that the tailings management policy and commitment are in conformance with the Finnish Tailings Management Framework and endorsed by senior management? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA question. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* |
| **Indicator 1 Level AA** | Has an external independent audit been conducted and determined that all requirements for a Level A have been met? |  |  |  |  |
| *If you have answered “Yes” to the Level AA question, continue to the Level AAA question. If you have not answered “Yes” to the Level AA question, the facility is a Level A facility.* |
| **Indicator 1 Level AAA** | Did the external audit for Level AA include an evaluation of the effectiveness of the policy, commitment and their implementation? |  |  |  |  |
| *If you have answered “Yes” to the Level AAA question, the facility is a Level AAA facility. If you have not answered “Yes” to the Level AAA question, the facility is a Level AA facility.* |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 1** | **Level:**   |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 2: TAILINGS MANAGEMENT SYSTEM** |
| **Indicator 2****Level B** | Has a tailings management system been implemented, or has the existing practices for the tailings facility being compared to the guidance[[5]](#footnote-5)? |  |  |  |  |
| *If you have answered “Yes” to the Level B question, continue to the Level A questions. If you have not answered “Yes” to the Level B question, the facility is a Level C facility.* |
| **Indicator 2** **Level A** | Is a tailings management system in place that is in conformance with the guidance5? |  |  |  |  |
| Was the tailings management system developed in consultation with key communities of interest?  |  |  |  |  |
| Has an internal audit been conducted and determined that the implementation of tailings management system is in conformance with the guidance5? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA question. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.**NOTE: A tailings management policy is an inherent component of the tailings management system, and a facility cannot achieve Level A with respect to Performance Indicator 2 without achieving Level A or higher with respect to Performance Indicator 1.* |
| **Indicator 2****Level AA** | Has an external independent audit been conducted and determined that the implementation of the tailings management system is in conformance with the guidance5? |  |  |  |  |
| *If you have answered “Yes” to the Level AA questions, continue to the Level AAA question. If you have not answered “Yes” to the Level AA question, the facility is a Level A facility.* |
| **Indicator 2****Level AAA** | Did the external audit for Level AA include an evaluation of the effectiveness of the development and implementation of the tailings management system and continual improvement of practices? |  |  |  |  |
| *If you have answered “Yes” to the Level AAA question, the facility is a Level AAA facility. If you have not answered “Yes” to the Level AAA questions, the facility is a Level AA facility.* |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 2** | **Level:**   |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 3: ASSIGNED ACCOUNTABILITY AND RESPONSIBILITY FOR TAILINGS MANAGEMENT** |
| **Indicator 3 Level B** | Has accountability for tailings management been formally assigned to an executive officer? |  |  |  |  |
| *If you have answered “Yes” to the Level B question, continue to the Level A questions. If you have not answered “Yes” to the Level B question, the facility is a Level C facility.* |
| **Indicator 3****Level A** | Has an internal audit been conducted and determined that the following requirements have been met:* the formal assignment of accountability to an executive officer; and
 |  |  |  |  |
| * the formal delegation of responsibility, budgetary authority and accountability for the implementation of tailings management system in conformance with the guidance[[6]](#footnote-6) to production and/or corporate personnel?
 |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* |
| **Indicator 3** **Level AA** | Has an external independent audit been conducted and determined that the following requirements have been met:* the assignment of responsibilities and accountability to the executive officer; and
 |  |  |  |  |
| * the formal delegation of responsibility, budget authority and accountability for the tailings management system in conformance with the guide4 to production and/or corporate personnel?
 |  |  |  |  |
| *If you have answered “Yes” to all of the Level AA questions, continue to the Level AAA questions. If you have not answered “Yes” to all of the Level AA question, the facility is a Level A facility.* |
| **Indicator 3** **Level AAA** | Did the external audit for Level AA include an evaluation of the effectiveness of the implementation of accountability and delegation of responsibilities? |  |  |  |  |
| *If you have answered “Yes” to the Level AAA question, the facility is a Level AAA facility. If you have not answered “Yes” to the Level AAA questions, the facility is a Level AA facility.* |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 3** | **Level:**   |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 4: ANNUAL TAILINGS MANAGEMENT REVIEW** |
| **Indicator 4 Level B** | Are there periodic formal reviews of the tailings management at facility level in conformance with the guidance[[7]](#footnote-7)? |  |  |  |  |
| *If you have answered “Yes” to the Level B question, continue to the Level A questions. If you have not answered “Yes” to the Level B question, the facility is a Level C facility.* |
| **Indicator 4** **Level A** | Has an internal audit been conducted and determined that the following requirements have been met:* the results of the annual corporate review of tailings management are reported to the accountable executive officer; and
 |  |  |  |  |
| * the review is in conformance with the guidance7?
 |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* |
| **Indicator 4****Level AA** | Has an external independent audit been conducted and determined that the following requirements have been met:* the results of the annual corporate review of tailings management are reported to the accountable executive officer; and
 |  |  |  |  |
| * the review is in conformance with the guide4?
 |  |  |  |  |
| *If you have answered “Yes” to all of the Level AA questions, continue to the Level AAA question. If you have not answered “Yes” to all of the Level AA questions, the facility is a Level A facility.* |
| **Indicator 4** **Level AAA** | Did the external audit for Level AA include an evaluation of the effectiveness of the annual tailings management reviews? |  |  |  |  |
| *If you have answered “Yes” to the Level AAA question, the facility is a Level AAA facility. If you have not answered “Yes” to the Level AAA question, the facility is a Level AA facility.* |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 4** | **Level:**   |

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|  | **Question** | **Y** | **N** | **NA** | **Description & Evidence** |
| **INDICATOR 5: OMS MANUAL** |
| **Indicator 5** **Level B** | Has an OMS manual been developed, or is an OMS manual, in conformance with the guidance[[8]](#footnote-8), being prepared? |  |  |  |  |
| Have roles and responsibilities for facility personnel been defined and documented? |  |  |  |  |
| *If you have answered “Yes” to all of the Level B questions, continue to the Level A questions. If you have not answered “Yes” to all of the Level B questions, the facility is a Level C facility.* |
| **Indicator 5****Level A** | Has an OMS manual been developed and implemented in conformance with the guidance8?  |  |  |  |  |
| Are emergency preparedness and response plans documented? |  |  |  |  |
| Has an internal audit been conducted and determined that the OMS manual has been developed and implemented that is in conformance with the guidance8? |  |  |  |  |
| *If you have answered “Yes” to all of the Level A questions, continue to the Level AA questions. If you have not answered “Yes” to all of the Level A questions, the facility is a Level B facility.* |
| **Indicator 5** **Level AA** | Are emergency preparedness and response plans tested and practiced regularly? |  |  |  |  |
| Has an external independent audit been conducted to confirm that the contents and implementation of the OMS manual are in conformance with the guidance8? |  |  |  |  |
| *If you have answered “Yes” to all of the Level AA questions, continue to the Level AAA question. If you have not answered “Yes” to all of the Level AA questions, the facility is a Level A facility.* |
| **Indicator 5****Level AAA** | Did the external audit for Level AA include an evaluation of the effectiveness of the implementation of the OMS manual? |  |  |  |  |
| *If you have answered “Yes” to the Level AAA question, the facility is a Level AAA facility. If you have not answered “Yes” to the Level AAA question, the facility is a Level AA facility.* |
|  | **ASSESSED LEVEL OF THE COMPANY’S PERFORMANCE FOR INDICATOR 5** | **Level:**   |

1. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 &

A Guide to the Management of Tailings Facilities. The Mining Association of Canada 2019. (Note! Always apply the latest version available.) [↑](#footnote-ref-1)
2. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 &

A Guide to the Management of Tailings Facilities. The Mining Association of Canada 2019. [↑](#footnote-ref-2)
3. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 &

A Guide to the Management of Tailings Facilities. Version 3.1. The Mining Association of Canada 2019. [↑](#footnote-ref-3)
4. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 (4.2.1.2.3 and BAT 12.c) &

Developing an Operation, Maintenance, and Surveillance Manual for Tailings and Water Management Facilities. Second edition. The Mining Association of Canada 2019. [↑](#footnote-ref-4)
5. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 &

A Guide to the Management of Tailings Facilities. The Mining Association of Canada 2019. (Note! Always apply the latest version available.) [↑](#footnote-ref-5)
6. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 &

A Guide to the Management of Tailings Facilities. The Mining Association of Canada 2019. [↑](#footnote-ref-6)
7. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 &

A Guide to the Management of Tailings Facilities. Version 3.1. The Mining Association of Canada 2019. [↑](#footnote-ref-7)
8. Best Available Techniques (BAT) Reference Document for the Management of Waste from Extractive Industries 2018 (4.2.1.2.3 and BAT 12.c) &

Developing an Operation, Maintenance, and Surveillance Manual for Tailings and Water Management Facilities. Second edition. The Mining Association of Canada 2019. [↑](#footnote-ref-8)