How should critical controls be applied to tailings risk management, if at all? And if not, how do we demonstrate adequate tailings risk governance?

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Keywords: critical control, ALARP, governance, safety case

# ABSTRACT

Risk assessment of Tailings Storage Facilities (TSFs) has been a topic given a lot of focus in recent years. In some cases one of the outcomes of a risk assessment, whatever form is taken, is to identify critical controls. This is discussed in several industry guides and, in the broader context for the mining industry, in ICMM (2015). While the notion that some controls have greater impact on an assessed risk profile is not disputed, neither are the benefits of simplifying risk management practices, the selection of what is critical can have significant impacts if the level of management is allowed to be reduced for the controls not selected as being critical. Couple this with an increasingly widely adopted need and/or goal to demonstrate that risk is managed As Low As Reasonably Practicable (ALARP), requiring all reasonably practicable controls to be implemented and maintained, and it appears that the identification of critical controls may in fact be adding complexity. Further, the widely adopted selection process within ICMM (2015) does not easily relate to geotechnical structures, which in the authors experience results in significant variation. This paper objectively explores this topic and attempts to make practical suggestions for improved practice.