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Submitted by: Michael Proulx, MGA

Submitted on behalf of: individual

Dear SASB, Ms. Hardin,

Thank you for including me in the first round of discussions on this important topic, drafting this comprehensive update to SASB's standards regarding Tailings and Hazardous Waste in Mining, Metals and Coal operations, and for considering these comments on the draft.

To start let me respond to the 5 Questions posed in the draft:

1. YES.
2. YES.
3. YES - with applause for unpacking this distinction
4. Unsure ... there are external codes in place on hazardous waste (cyanide) versus waste such as paint and batteries (which have long been a focus for recycling and/or responsible disposal). Caveat: I am focused on the mining sector, so things like paint and batteries have not been involved in any conversations I have had - though batteries are an emerging topic in electrification.
5. Outside my area - though I do cover metallurgical coal miners and the use of selenium.

I am of the opinion the draft is very well researched and presented, with pros and well noted. These are comments/questions concerning the body of the Tailings Standard.

a. regarding EM-MM-150a.1 Will the Total weight produced allow for a weighted Total Cost of TSF - based off of company totals - whether TSF cost, production and/or total weight generated?

b. Paragraph 7, pg 10 - the definition of 'significant event' could use a reference to materiality - or else will be point of contention for disclosure and transparency.

c. There are similar concerns regarding Paragraphs 43-46 - the risk likelihood is a misleading comment - as even with the TSF characteristics requested the ability to comfortably assess probability risk is a stretch for SASB, amongst professionals ... I do think the shift away from MHSA Risk Categorization based on potential number of deaths, to something inclusive of environmental, reputational and other related risks is a step forward.

I hope this is of some value, and I would like to take this opportunity to thank you for developing this standard. I look forward to employing it, and other SASB standards in my own work.

Best regards,

Michael Proulx, MGA