



	LIQHOBONG MINING DEVELOPMENT COMPANY		
	Title of Document		Subject / Category
	Residue Storage Facility Management Policy		RSF- GISTM
	Document Owner		Document Controller
	Motsi Chele		Motsi Chele
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Applicability	LMDC employees and Contractor Operator		
Review	To be reviewed every 2 years		

	Name	Designation	Signature	Date
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Approved by	Roberto De Pretto	CEO		

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1. INTRODUCTION

There has been an increasing focus on the design, construction, maintenance, operation and monitoring of mineral residue disposal and storage facilities due to an increase in failures of tailings facilities, which have resulted in fatalities and environmental pollution across the world. Therefore, the mining industry (including LMDC) is increasingly faced with demands to address their triple bottom line throughout the lifecycle of mining operations. Public outcry against poor environmental and social performance in the industry can impede the permitting process, stopping or preventing new and old mines from development and operation.


Residue Storage Facility (RSF) can have the most significant impact on the environment, and therefore LMDC recognises the need to adopt and implement world-class systems, standards and processes to manage the risks associated with their operation. To this end, LMDC has adopted and implemented the Global Industry Standard on Tailings Management (GISTM).

2. SCOPE

This policy applies to all employees and contractors at LMDC, as well as communities surrounding the operation.

3. DEFINITIONS


Term	Definition
Residue	A by-product of mining, consisting of the processed rock or soil left over from the separation of the commodities of value from the rock or soil within which they occur.

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Residue facility	A facility located on the surface of an open pit mine that is designed and managed to contain the residue produced by the mining processes

4. ABBREVIATIONS

Term	Abbreviation
GISTM	Global Industry Standard for Tailings Management
RSF	Residue Storage facility
AE	Accountable Executive
RTFE	Responsible Tailings Facility Engineer
EOR	Engineer of Record
ITRB	Independent Tailings Review Board/Reviewer


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5. OBJECTIVES

This policy seeks to guide the development and implementation of the GISTM standards and processes that will ensure the RSF is safe and has minimum environmental impact from its design, construction, management and operation to closure.

6. RESPONSIBILITIES


- Accountable Executive (AE) shall be accountable for the safety of the RSF and for environmental and social performance.
- Responsible Tailings Facility Engineer (RTFE) shall be accountable for the integrity of the RSF and to ensure compliance to this policy.
- Engineer of Record (EOR) shall be responsible for the design, construction and performance reviews of the RSF
- Safety, Health, Environmental and Community Officer (SHEC) shall be responsible for ensuring compliance with occupational health and safety, social and environmental laws, procedures and guidelines and to provide advice on measures needed to minimize hazards or unhealthy situations.
- Independent Tailings Review Board/Reviewer (ITRB) shall be responsible for reviewing of the design, construction, risk assessments, governance systems and other risk management matters that can affect the RSF.

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7. POLICY STATEMENT

LMDC Management is committed to RSF management and standards that align with recognised global best practices for the preservation of health, safety and the environment during all phases of the mining life cycle. These standards, based on GISTM, provide assurance of the following objectives being met:


- The levels of safety and environmental impact of our RSF is well understood and the RSF is managed to ensure alignment with applicable international standards at all times.
- Safety is continuously improved through the advancement and support of technologies and management systems and participation in global initiatives.
- The RSF is managed with due consideration of its impact on the physical, social and economic environment and stakeholder perception of safety.
- The RSF is managed through the full life cycle that spans the conception, site characterization, design, construction, operation, monitoring, decommissioning and closure phases, as well as continuity across the phase boundaries.
- Sound engineering practice is applied to all phases of the RSF life.
- Roles, responsibilities, accountabilities and authorities are clearly defined and adequate resources are assigned at the operational and corporate levels.

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- Ensure that all personnel working at the RSF have the appropriate skills, knowledge and resources to safely and effectively execute their duties
- Risk management and assessment in respect of the RSF is carried out routinely or as and when it may become necessary, the results of which are reviewed and overseen by industry renowned, nonconflicted, third party experts as appropriate to the classification of the RSF.
- Processes are established to identify, recognize and respond to impending failure of the RSF and mitigate the potential impacts arising from a potentially catastrophic failure.


The LMDC Code of Practice which is aligned with the GISTM gives effect to the policy objectives. It requires that governance takes place within a formal system that provides assurance that the following is implemented within each of the phases of the life cycle of the RSF:

- An assurance program providing for the frequency and scope of the various levels of inspections, audits and reviews as well as the specification for the competence requirements for those undertaking the work.
- Independent reviews and rigorous assurance programs that are transparently reported on in management and governance structures within the organization.
- A formal adaptive management process for corrective action and changes incorporated into the requisite elements of the management system and life of RSF plan.

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The Technical Steering Committee shall be informed of the status of the RSF providing confirmation of the following:

- The RSF has been designed with a full understanding of the consequences of failure, of site conditions and reasonably expected operating conditions.
- The RSF has been designed, constructed and is operated in accordance with defined thresholds and performance indicators with particular reference to containment integrity and overtopping.
- The RSF is, and will be, managed in accordance with the GISTM, applicable legislations and international good practice.
- Construction, operation, maintenance and surveillance of the RSF is proceeding in conformance to design intent.
- Compliance and performance are verified as part of the LMDC assurance program, both internally and externally. Non-conformances that may increase risk to the point where the design intent may not be achieved, are identified, reported and immediately addressed.
- An emergency response plan based on a comprehensive understanding of the consequences of failure has been developed, implemented, maintained and tested.

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- In alignment with the requirements of the GISTM, the above items are independently verified by suitably qualified professionals (an external reviewer/review board) at intervals dictated by the classification of the RSF.

The RSF has been designed, constructed and will be operated under principles defined by the protection of human life and care of the environment through proactive incident prevention and environmental impact mitigation.

8. REPORTING


Reporting will be done to the Technical Steering Committee at the scheduled quarterly meetings on progress with the implementation of the GISTM, including compliance elements identified in the Standard.

A report will be submitted annually to the Technical Steering Committee covering elements and requirements contained in this policy.

9. REFERENCES

This section provides a list of related legislation and/or good practice guidance that informs and supports the interpretation of this policy.

- Lesotho Mines and Minerals Act, 2005
- International Council on Mining & Metals, Global Industry Standard on Tailings Management, 2020

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- International Council on Mining & Metals, Conformance Protocols for Global Industry Standard on Tailings Management, 2020
- International Council on Mining & Metals, Tailings Management: Good practice guide, 2021
- LMDC Residue Storage Facility Code of Practice

10. REVISION HISTORY

Issue No	Effective Date	Date Last Revised	Amendment Details
01			
02			

11. APPENDICES

None