



To,  
**Rosia Montana Gold Corporation SA**  
**321, Piata Street, Rosia Montana**  
**AB 517615**

**CC: REPA Sibiu, EPA Alba**

**Ref: The request for issuing the environmental agreement concerning the mining project Rosia Montana**

Following the analysis of the documentation submitted by EPA Alba and recorded at the Ministry of Environment and Water Management, under No 60231/AF/17.12.2004 and the checking of the site, it has been shown that the proposed project is laid down in Annex No I.1 to the Ministerial Order No 860/2002 on the approval of the procedure for the environmental impact assessment and the issuance of the environmental agreement – the List of the activities with significant environmental impact, which are subject to the environmental impact assessment, at point 5.6, letter a).

The Technical Review Committee, which met on 10.05.2005, established the necessity of drawing – up the environmental impact assessment study, finalised through the EIA report. The content of the report is the one recommended in the methodological guidance on the scoping stage and on the achievement of the EIA report, approved by the Order No 863/2002 for the approval of the methodology guidelines to be applied to the stages of framework procedure for environmental impact assessment. The impact assessment study will be drawn up by an independent natural or legal person and certified according to the law.

Within maximum 10 working days from the receiving date of this address, you have the obligation to inform the public on the screening decision, according the provisions of article 37 of Order 860/2002, the public having the right to present within 10 working days from the date of publication, justified proposals for reconsidering the decision (the content of the public announcement is the one specified in Annex II. 4 to Order 860/2002).

Within 5 working days from the receiving of the screening decision, the developer has the right to present to the competent public authority for environmental protection, a complaint of the decision concerning the screening stage.

Having in view that in the presented project, installations/ activities which fall under the provisions of Emergency Ordinance No 34/2002 on integrated pollution prevention, reduction and control, approved by Law No 645/2002 are laid down, the application of the specific requirements of the integrated permit, including the ones referring to the limits of pollutants in emissions, in comparison with the application of the best available techniques, is necessary.

As well as, having in view that the project involves hazardous substances, you have the obligation to also forward to the public authority for environmental protection, the safety report,

drawn up according to the legal requirements Seveso II, laid down in GD No 95/2003 concerning the control of the activities which present major accident hazards involving dangerous substances.

The observations and the comments of the representatives of the public authorities and institutions involved in the Technical Review Committee are as follows:

MINISTRY OF ENVIRONMENT AND WATER MANAGEMENT (MEWM) - Waste Management and Dangerous Chemical Substances Directorate

Taking in consideration the environmental risk generated by handling in closed and open circuit of important cyanide quantities and undesired experience related to major accidents on Romanian and foreign territory, we address the following questions related to minimization of risks of utilization of such important cyanide quantities:

1. Which are the supplementary technological measures envisaged to be taken at Rosia Montana compared to the classical solution of over-cyaniding– presentation of alternative technologies and justification of chosen alternative.
2. Which are the specific measures proposed to be taken at Rosia Montana taking into account the local situation within the area?
3. Which are the measures envisaged to be taken following the previous unfortunate Romanian experience concerning gold extraction using cyanide – detailed plan for accidents prevention?
4. Which are the measures envisaged to be taken in order to waterproof the tailings pond - in accordance with EU requirements for hazardous waste landfilling and safety measures in case of technical incident/accident?
5. Which are the constructive measures for a high risk installation; it must be considered the maximum load of the tailing pond and also the exceptional precipitations that occurred during the last period. Do not take into account the multi-annual average of the precipitations during 5-10 years period or the maximum flood flow. These data shall be used in stability calculations during normal periods and during natural disaster situations (e.g. earthquakes, exceptional precipitations, landslides).
6. Most of the accidents to the pond took place as a result of exceptional precipitations – are you going to take special measures in this respect?
7. Which are the measures envisaged to be taken for ensuring the pipelines and the dams?
8. Which are the measures envisaged to be taken in order to prevent the cracking of the bottom liner of tailing ponds taking into account the geological, hydrological, geo-technical and hydro-geological conditions (the instability of the soil, the high level of the ground water, etc.)
9. What are the situations or how did you establish that a maximum 10% of slope does not represent a risk for safety work and environment?; how do you guarantee that these slopes are appropriate for abnormal situations?
10. The management plan for cyanide and of acid water mentioned within the Project Presentation Report must be in compliance with the new Directive on management of waste from extractive industry.
11. Which are the protection measures of the constructed dams, against possible deterioration induced by the plants roots, animals and micro-organisms?
12. Which is the location of tailing ponds (location alternatives), the geological, hydrologic, geo – technical, hydro-geological conditions?
13. Calculation base for financial guarantee.

14. Which are the measures taken into account for landfilling infrastructure in case of increasing of processed quantity?

MEWM – Directorate of biological diversity conservation and biosafety

1. Describe, according to the Habitats and Birds Directives, the types of habitats, the flora and fauna species located within the project area; protection measures of their protection.
2. Alternative locations of the works in order to avoid the negative impact on the protected areas provided for by Law 5/2000, located within the project area: Piatra Despicata and Piatra Corbului.
3. Presentation of the Biodiversity Conservation Plan as part of the EIA Report.
4. Which are the mitigation measures of the impact on aquatic and terrestrial ecosystems during the construction, operation and closing stages of the project?

MEWM – Water Department

*Protection of water resource*

1. Which are the proposed measures to minimize the negative impact on water quality due to the mining works undertaken before the initiation of the Rosia Montana project?
2. Where will the raw water be supplied from in order to maintain ecological flow on Rosia and Corna rivers in times of extreme drought?
3. What will be the consequences of Rosia small river deviation and of non contaminated spills down stream Cetate reservoir?
4. Which are the measures and operational works for protection of underground water within the project area for including them into Basin River Management Plan?
5. How the protection of underground water will be ensured in case of the construction of the tailing ponds?

*-Water supply:*

1. Can Aries River ensure the water both for mining activity and for urban area?
2. How the household and population consumption will be affected due to the huge demands of water for mining purpose?
3. Which is the impact of such huge consumption of water in the Rosia Montana Project on the other water users from down stream?
4. What measures and installations will be provided for the treatment of Aries River water for human consumption?
5. Which is the impact generated by the construction of water supplying pipe-line of 11.2 km in length, longway Abrud River reaching Gura Rosia?

*-Industrial water management:*

1. Which measures are proposed to minimize the negative effect on water quality of the previous mining activities?
2. Which are the water collecting structures for the water generated volumes in normal regime of precipitations, others than the tailing pond or the pond for rainwater?

3. How many industrial wastewater treatment plants are involved in the Project: one, two or three (corresponding to the tailing ponds)?
4. What safety conditions for spillage and pollution will be provided for Cetate industrial water pipe-line, which will be buried?
5. Which measures will be taken regarding sludge management from industrial wastewater treatment plant? Where the sludge will be disposed of and how it will be used?
6. What measures will be taken for technological water circulation on drought conditions?
7. Which will be the environmental impact generated at the discharge points of treated waste water on the Project area?

#### MEWM- Directorate for Elaboration and Implementation of Economic Environmental Policies

1. The drawing up of a quantitative and qualitative balance concerning the cyanides used in the technological process.
2. A presentation of the technical measures and solutions for the protection of the aquifer under the waste dump heap and its neighbouring areas.
3. A presentation of a study on the geological base concerning the identification of the surface and underground vulnerability, and a presentation of the current situation of the site in order to exist a comparison base.
4. How do you solve the post-closing reuse of the site and the how the requests of the local community are taken into account?
5. The drawing up of a risk management plan on the site.
6. A presentation of the compliance manner with the principles concerning the implementation of the environmental management.
7. Who will be the responsible person for monitoring, rehabilitation of the site and for carrying out the necessary measures in order to reconstruct the areas, if necessary, in the post-closing period?
8. Detail the manner in which funds and guarantees regarding the post-closure works and monitoring over a period of more than 25 years will be ensured.
9. A presentation of a study on the effects of the blowing up within the quarries concerning the vibrations propagation, as well as on the risk exposure of the constructions within the strictly protected and buffer areas, including of the population dwelling within these areas, in order to protect them.

#### MINISTRY OF ECONOMY AND TRADE

1. Taking into account that the project is subject to EGO No 34/2002 on integrated pollution prevention, reduction and control, we propose that the EIA Report provide information on how the applied/proposed technologies are the best available techniques (BAT).
2. The waste dumps heaps are subject to the provisions of EGO 244/2000 on the dams safety. It is required that the EIA Report indicate the compliance of the waste dumps heaps with the above-mentioned regulation.
3. Detail aspects of the tailing ponds, including their compliance with EGO 244/2000.
4. The impact assessment of potential wastes (ferrous, non-ferrous plastics, textile, electric, electronics and house-hold waste, etc.) resulted from used or no longer used machines and equipments ( ref. question no.52 of the check-list)

5. The impact assessment of other solid wastes, such as those generated by the transport activities (batteries, used car batteries, used tires, etc), by activities undertaken within the quarries or other related activities (ref. question no 55 of the check-list).

#### MINISTRY OF TRANSPORTS, CONSTRUCTIONS AND TOURISM

1. What are the consequences and on what circumstances the tourism activities may continue, taking into account that the project works will affect the area (changes of the landscape, access to archaeological and recreational sites, etc.)?
2. What is the rehabilitation period for the environment, taking into account that the operational period for the project is around 20-25 years?
3. Landslides may happen as a result of the exploitation; how do you plan to solve this situation?
4. How do you plan to reconstruct the area after the operational period?
5. What are the effects on the exploitation area if a riverbed is altered as a result of heavy rain or snow?
6. There is the risk of crumbling within the working area; where will processing and ore extraction take place in this event?
7. How is going to take place the terrestrial transport of the exploited materials and of the personnel involved in this activity in safe conditions, taking into account the type and the number of vehicles, as well as the working hours?
8. What are the consequences on the environmental elements (soil, water, air) on medium and long term periods, taking into account that the works occupy 46% of Zonal Urban Plan area, respectively 723 ha, out of which 518 ha represents the tailing facility?
9. What will happen with the tailing pond after the operation period?
10. The project presentation report represents a critical point of view of the current environmental situation. It is requested that the EIA Report should not present in a superficial manner the issues about the proposed exploitation.
11. The project presentation report says the impact on the environment is minor. This statement is not in accordance with the reality, because there is the possibility that a riverbank afforested with trees and bushes becomes a compact mass of sterile containing cyanides. How do you plan to avoid this situation?
12. Provide a proper location for the displaced local authorities/headquarter of the commune, taking into account that the Project Presentation Report mentions only a proposal for 2/3 of Rosia Montana village to be removed, and for the protection of the existing centre of the commune, situated also on the edge of an exploitation crater.
13. It is required that the Action Plan for displacement and relocation also contains detailed situations on the number (category) of abandoned houses, on the sites (number, category of houses) which will be reconstructed according to the conciliation procedures carried out among parties.
14. How the exploited materials on the railroads are going to be transported, if this mode of transport is used?
15. What roads or transport routes will be developed for the project in order to ensure a safe exploitation of the area?

#### THE NATIONAL AGENCY FOR MINERAL RESOURCES

Concerning the question from the Check List “The project foresees the use, storage, transport, handling or the production of substances or materials which may harm public health or the

environment or may increase the fears that the project would present a certain risk for public health?" answers to the following questions are requested:

1. Taking into account that the maximum admissible quantities from NTPA 001 and the EU regulations are observed, the high level flows of slurry to the tailing facility lead to the discharge of free cyanide quantities (approximately 45.6 kg cyanide/hour); this means that the quantity of 400 tonnes/year is very high. How it is going to be solved the atmospheric release of a large quantity of free cyanide resulted from the sterile slurry circulation to the tailing pond? What will happen after the operation period?
2. Taking into account that the mineral and chemical analyses proved the existence of Hg, what kind of treatment is it going to be applied and how this Hg will be stored?

Concerning the question from the Check List "Will the project have as effect the emissions into the air of pollutants of any other dangerous, toxic or harmful substances?" answers to the following questions are requested:

1. How are the dust emissions resulted from the processing by using the technologies, equipments and installations mentioned, going to be monitored?
2. What is the cyanide quantity that is daily evaporated and how the risk of "cyanide rains" can be avoided?
3. A study on the evaporation of cyanide from the tailing pond is necessary to be elaborated and, it is necessary to be determined the risk level of "cyanide rains", the area covered by these rains and their effects, based on a meteorological study.

Concerning the question from the Check List "Will the project lead to the risk contamination of the soil and water through the pollutant emissions on the land and into the surface waters, ground, costal and marine waters?" answers to the following questions are requested:

1. How will the waste dumps heap subject to chemical (acid) treatments be neutralized and what are the involved costs?
2. What are the economic- financial implications in processing the gold ore without building the poor ore heap?
3. How will the poor ore heap be protected?

Concerning the question from the Check List: "Is there the risk that, during the construction and the operation of the project accidents which may affect population health or the environment to produce?"

1. It is requested to be considered in the EIA Report the construction of an emergency tailing pond to be used in case of breaking down the proposed tailing pond?

Concerning the question from the Check List "Are there other factors which can be taken into account?" answers to the following questions are requested:

1. What impact the hydro-geological system "unitary interconnected" formed by the Orlea, Cetate, Carnic and possibly Jig quarries might have?
2. How will the Paraul Porcului and Sulei quarries used for construction material extraction be rehabilitated?

NATIONAL ADMINISTRATION "APELE ROMANE"

1. What is the modality to reduce the accidental pollution's risks with cross border effects, due to the possible technical accidents during the project existence;
2. The quantitative and qualitative water balance must be made;
3. A detailed chapter related to the necessary works in order to control the soil erosion and the catching of the terrace water sources must be developed (more detailed).

#### MINISTRY OF HEALTH – Institute for Public Health

In the Check List for the scoping stage for Rosia Montana project, the Ministry of Health requests answers to all the questions that are stipulated in this document. According to the Precautionary Principle, the Ministry of Health asks for more details regarding questions number 40, 41, 42, 43, as follows:

1. Health risk assessment of dangerous chemical substances that are used in the initial phase of mining activity, according to table No 2.8.b. from the Project Presentation Report, whose bad management may lead to environmental contamination.
2. Health risk assessment of environmental contamination with potential pollutants that can be produced over the Project stages, respective acid waters and cyanides.
3. Health risk assessment of accidental discharges of reactive substances into the environment during the mining process.
4. Health risk assessment of dust that result in mining process but especially after Aeolian erosion of lands without vegetation.
5. Health risk assessment of noise that is generated during the Project activity.
6. Health risk assessment of soil contamination as a result of leakage of technological chemical substances and effluents such as: cyanides, caustic soda, HCl, lime, flocculent mass, oils and lubricants
7. Health risk assessment of population displacement from one place to another, changing their usual habitat, especially for the aged one, as is specified in the Project Presentation Report.
8. Health risk assessment of diminished agricultural land and woodland:
  - Perturbation of air self-purification process as a result of the diminishing of vegetation in the area;
  - Disappearance of natural obstacles that provided protection against movement of the polluted air.

#### MINISTRY OF ADMINISTRATIN AND INTERIOR

1. The specifying of certain details of the content of the intervention plan in the case of certain major accidents is necessary, as component part of the Intervention Plan in case of damage/accidents, laid – down at point 2.2.3.4.8 of Project Presentation Report and respectively questions No 76, 77, 78 of the Check List for scoping stage;
2. The specifying of certain constructive and exploitation safety measures concerning the warehouse for explosive, having a surface of 1.1 ha, presented to the point 2.1.4, respectively questions No 40-44 of the Check List for the scoping stage.
3. Presenting the measure which will be taken, so that the storage and handling zones of the chemicals reactants to produce a minimum impact on the workers health and on the environment, point 2.2.3.3.9, respectively questions No 76, 77, 78 of the Check List for the scoping stage.
4. It is necessary for all the hazardous substances and waste to specify the measures which are to be taken during their transport, handling, storage and use, in compliance with the provisions of the

GD No 95/2003, which transposes into the national legislation, the requirements of Directive SEVESO II, respectively questions No 45-55 of the Check List for the scoping stage.

#### THE MINISTRY OF CULTURE AND RELIGIONS

1. What is the management plan of the archaeological patrimony, discovered during the preventive archaeological researches carried out on the archaeological site Alburnus Maior?
2. What is the management plan of the historical monuments from the territory of the commune Rosia Montana?

The detailing of these requirements shall be made according to Annexes 2 and 3, which are an integrated part of this document.

#### ROMANIAN ACADEMY

Concerning the question from the Check List for the scoping stage “Will the project involve one of the following actions, which will create changes within the area as the result of the nature, size, shape or purpose of the new investment?”, answers to the following supplementary questions are required:

1. The destruction of the existing archaeological vestiges within the project area through underground galleries, excavations and quarries.
2. The variation of the level of the aquifer and its pollution during and in the post - closure period of the project.
3. The possibility of the pollution with heavy metals (Fe, Cu, Pb, Zn), due to the air circulation, resulted from the degrading of the sterile dump heaps and from the current exploitation activity (explosions, rocks removal, etc.).
4. The possibility of the pollution (infiltrations, water courses, etc.) with harmful substances (heavy metals, cyanides and elements resulted thereof), which have as source the tailing pond.
5. The possibility of the disappearance of flora and fauna species, protected by the international conventions, EU Directives and by the national legislation, as well of the habitats of these species.
6. The effects of the existence of certain induced seismicity within the weight dam area of the tailing pond.

#### THE MINISTRY OF EUROPEAN INTEGRATION

1. It is necessary to ensure compliance with the harmonised environmental legislation, with the provisions of the *acquis* which has not yet been transposed into the Romanian legislation and to take into account of the European Community provisions in the field, which are to be adopted in the following period.
2. It is necessary for the developer to take into consideration the responsibilities derived from the implementation of Directive 2004/35/CE on environmental liability with regard to the prevention and remedying of environmental damage. Having in view the importance of the provisions of Council Decision 2003/80 (its application is, for now, blocked because of the case before the European Court of Justice, between the European Commission and the EU Council) on the application of the Criminal Code concerning the aspects regarding



- environmental protection, it is useful to keep updated with the new developments at Community level concerning this matter.
3. During this year, in accordance with the objectives set in the 6<sup>th</sup> Action Programme for Environment, the adoption at Community level of the thematic strategies on the air quality, soil protection and waste management is intended. These strategies include important environmental objectives for the coming period. The implementation in Romania of the mentioned strategies will have direct implications also on the development of the Rosia Montana mining project.
  4. Rosia Montana Gold Corporation must take into account the Directive proposal on the management of waste resulted from the extractive industry in developing the mining project. This proposal introduces new community rules on the prevention of the waters and soil pollution due to the system of the tailing ponds or waste dump heaps. In the same respect, it is necessary to take into account the provisions of the Directive proposal on the protection against pollution of ground waters.

Following the development of the notification procedure of the potential affected states, according to Law No 22/2001 on the ratification on the Convention on Environmental Impact Assessment in a Transboundary Context, adopted at Espoo, on 25 February 1991, Hungary expressed its willingness to participate in the environmental impact assessment procedure. In this respect, the Hungarian party submitted the issues presented in Annex 4.

We recommend that the answers to the addressed questions to be synthesised in the last part of the EIA Report.

Having in view the obligations resulted from the application of the Espoo Convention, the EIA Report must be submitted in English, too.

The Annexes to the present Guide are integrated part thereof. These are:

- Annex 1: the Check List for the scoping stage, drawn up according to the provisions of the Methodological Guide on the scoping stage and for the drawing –up of the EIA Report, approved by Order No 863/2002 for the approval of the methodology guidelines to be applied to the stages of framework procedure for environmental impact assessment.
- Annex 2: Management plan for the archaeological patrimony from Roşia Montană site
- Annex 3: Management plan for the historic monuments and protected areas of Roşia Montană
- Annex 4: The proposals of the Hungarian Party.

The present document is the Guideline containing the issues resulted during the screening and scoping stage.

This Guideline will be used by the developer as terms of reference for the EIA Report.

**SECRETARY OF STATE**

**Constantin POPESCU**

**Annex 1**

Questions to be considered	Yes/No/?/NA	Is it likely that the effect be significant? Why?	Which environmental components are likely to be affected?	Is the effect likely to be significant on the components? Why?	
1	2	3	4	5	
Question – Will the project involve any of the following actions, which would create changes in the locality, as a result of the nature, scale, form or purpose of the new investment?					
1.	Permanent or temporary change in land use, way of coverage, topography, including increases in intensity of land use?	Yes	Likely, yes. The mine license gives RMGC entitlement to a surface area of 4282 ha. Temporary and permanent land use changes will occur, including deforestation. In the Technical Memorandum, information has been supplied concerning historical, cultural and archaeological aspects, but more information is, however, needed related to conservation and protection of these vestiges. It is also uncertain whether or not the impacts of these changes are irreversible or if they are destined to be permanent or temporary. It is necessary to quantify the areas that will change permanent or temporary the current land use and how much can be recovered.	A, B, C, D, E, F, G, I, J, L, M, O, P, R, T, V, U, W, X, Y, Z, BB, CC, EE, FF, GG, HH, KK, LL, NN, PP, QQ, RR, TT, UU, VV, WW	Likely, yes. The mine license gives RMGC entitlement to a surface area of 4282 ha. Temporary land use changes will occur, including deforestation (2500 ha). In the Technical Memorandum, information has been supplied concerning historical, cultural and archaeological aspects (T) but more information is, however, needed to address points B., I., L., S in the Criteria Checklist. It is also uncertain whether or not the impacts of these changes are irreversible or if they are destined to be permanent or temporary. Land use change could lead to climate changes, soil erosion, qualitative and quantitative effects on waters, significant change of economic and social condition within the area.
2.	Clearing of existent land, vegetation and buildings?	Yes	Potentially, yes. There is documentation supplied on the issue of land clearance but there are few details provided on the issue of reforestation. There also has been little consideration given to the question “will many people be affected by the land use changes and in what ways?” More information will be needed beyond the technical memorandum to address whether or not land use changes could have an impact on the commercial value of the properties.	A, B, C, D, E, F, I, J, K, L, T, U, V, W, X, Y, Z, BB, CC, EE, FF, II, KK, LL, QQ, RR, TT, VV	Potentially, yes. There is documentation supplied on the issue of land clearance but there are few details provided on the issue of reforestation. There also has been little consideration given to the question “will many people be affected by the land use changes and in what ways?” More information will be needed beyond the technical memorandum to

			Finally, the Technical Memorandum provides very few information on the possible impacts on the industrial installation within the area ( <i>Question How many people and other receptors will be affected?</i> )		address whether or not land use changes could have an impact on the commercial value of the properties (D). Finally, the Technical Memorandum provides very few information on the possible impacts on the industrial installation within the area ( <i>Question How many people and other receptors will be affected?</i> ). There is no information on the effects of deforestation on environmental media and on noise and dust resulting from demolition.
3.	Creation new land uses?	Yes	Potentially, yes. The Technical Memorandum provides details on the species of wildlife and flora inhabiting the forested region but more information is needed to ascertain whether or not the region is an important route for migrating birds and other fauna, or it is an important area for tourism and recreation. How sensitive the surrounding mountains and forests are from ecological point of view	A,B, C, D, E, F, G, I, J, K, L, M, O, P, R, T, V, U, W, X, Y, Z, BB, CC, EE, FF, GG, HH, KK, LL, NN, PP, QQ, RR, TT, UU, VV, WW	Potentially, yes. The Technical Memorandum provides details on the species of wildlife and flora inhabiting the forested region but more information is needed to ascertain whether or not the region is an important route for migrating birds and other fauna (L), or it is an important area for tourism and recreation (R). How sensitive the surrounding mountains and forests are from ecological point of view (I, J). Creation of new land uses may lead to climate changes, soil erosion, the impact on water quantity and quality, significant change of economic social conditions within the area.
4.	Preconstruction investigations (e.g. soil testing, drillings?)	Yes	Potentially, yes. Although many tests have been undertaken, it may be insufficient for assessing the impacts of the project on important wetlands, watercourses and underground water bodies. There is not sufficient information in the Technical Memorandum to conclude whether or not existing pollution levels, when compounded	C, F, GG, FF	Potentially, yes. Although ample testing has been undertaken, it may be insufficient for assessing the impacts of the project on important wetlands, watercourses and water bodies (see item E.). The statement of the Technical Memorandum, "...extensive geotechnical work,

			by additional mine-induced pollution, will result in irreversible effects.		including drilling, test pitting, and rock and soil sampling have been undertaken...” provides little inference on the existing contamination of soils (the area has been mined for 2000 years), nor is there sufficient information in the Technical Memorandum to conclude whether or not existing pollution levels, when compounded by additional mine-induced pollution, will result in irreversible effects (See Questions #2 and #13 on the checklist).
5.	Construction works?	Yes	Potentially, yes. Although there is information embodied within the Technical Memorandum documenting, inter alia, heritage and cultural issues, there is insufficient information supplied to effectively address how these changes will affect cultural identity and associations, individual’s sense of personal security and impacts on employment and quality of employment. More detail is needed on the topic of communities than that contained in the Technical Memorandum before the question <b><i>Is the project likely to affect any aspects of human or community health or welfare?</i></b> can be properly answered.	A, B, C, D, E, F, I, J, K, L, M, O, Q, T, U, V, W, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, LL, PP, QQ, RR, TT, VV, WW	Potentially, yes. Although there is information embodied within the Technical Memorandum documenting, inter alia, heritage and cultural issues, there is insufficient information supplied to effectively address how these changes will affect cultural identity and associations (RR.), individual’s sense of personal security ( PP) and impacts on employment and quality of employment. More detail is needed on the topic of communities than that contained in the Technical Memorandum before the question <b><i>Is the project likely to affect any aspects of human or community health or welfare?</i></b> can be properly answered.  The construction works can affect the air, water, soil quality, generate noise and vibration, may lead to water and soil acidification and may influence socio-economical conditions within the area.
6.	Demolition works?	Yes.	Potentially, yes. The Technical Memorandum	A, C, D, F, G, I, J, R, T, Y, BB	Potentially, yes. The Technical

			stipulates that an estimated 953 families will be affected and relocated. More detail is needed to address the noise impacts of demolition works.	CC, FF, GG, LL, QQ, UU, VV, WW	Memorandum stipulates that an estimated 953 families will be affected and relocated. More details are needed to address the noise impacts of demolition works (GG.)
7.	Temporary sites used for construction works or houses for constructors?	Yes	Potentially, yes. Based on the Technical memorandum there are no assessment methods, at this moment for environmental and socio-economical effects resulting from increased traffic.	A, C, D, F, G, I, J, R, T, Y, CC, FF, GG, LL, QQ, UU, VV, WW	Potentially, yes. The camp will be built near to the process facility and have potable water, sewage disposal and waste disposal systems. Water supply systems will also be constructed, and generators will be installed on the plant site only.
8.	Surface constructions structures or earthworks, including linear structures, cut and fill, or excavations?	Yes	Potentially, yes. On the basis of the information given, there is no way of ascertaining the <i>potential</i> environmental impacts resulting from the construction of these quarries, including potential water contamination, airborne pollution and soil degradation. The scale of the project requires much more detail to be supplied on environmental protection than is presently included in the Technical Memorandum	A, B, C, D, E, F, G, I, J, K, L, M, O, P, Q, R, S, T, U, V, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, LL, PP, QQ, RR, TT, UU, VV, WW	Potentially, yes. On the basis of the information given, there is no way of ascertaining the <i>potential</i> environmental impacts resulting from the construction of these quarries, including potential water contamination, airborne pollution and soil degradation. The scale of the project requires much more detail to be supplied on environmental protection than is presently included in the Technical Memorandum
9.	Underground works, including mining or tunnelling?	No			
10.	Land improvement works?	No			
11.	Dredging?	No.			
12.	Coastal structures (e.g. sea dams)?	No			
13.	Sea structures?	No			
14.	Production and manufacturing processes?	Yes	Potentially, yes. There is always a risk for a cyanide-related accident but there is insufficient information in the Memorandum, particularly about waterproof and destruction methods, the safe transport of hazardous substances to provide an accurate assessment about the potentiality for disaster.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially, yes. There is always a risk for a cyanide-related accident but there is insufficient information in the Memorandum, particularly about waterproof and destruction methods, the safe transport of hazardous substances

					to provide an accurate assessment about the potentiality for disaster. (Question #11, <b><i>Is there a high probability of the effect occurring?</i></b> ). Depends upon containment manner of effluent and the sterile composition. The production processes influence the quality of the environmental media and the socio-economic conditions within the area.
15	Facilities for storage of goods and materials?	Yes.	Yes. Failure could produce a catastrophic environmental impact. There are few details supplied on disaster management planning in this context.	A, B, C, D, E, F, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. Failure could produce a catastrophic environmental impact (F, G, BB, CC, EE, FF). There are also few details supplied on disaster management planning in this context.
16	Facilities for treatment or disposal of solid waste and liquid effluents?	Yes.	Yes. Failure could produce a catastrophic environmental impact. There are few details supplied on disaster management planning in this context. Based on the information provided by the technical memorandum it cannot be established the potential of acid water release during operation and post closure. There is no way of determining the potential downstream effects in the event of contamination	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. Failure could produce a catastrophic environmental impact (F, G, BB, CC, EE, FF). There are also few details supplied on disaster management planning in this context. Full justification for choice of site for TMF needs to be made. Evidence of investigation of alternative sites and reasons for their rejection should be argued. Material in the TMF will contain~2% sulphur-huge acid waters potential. There is no way of ascertaining, based on the information supplied in the Technical Memorandum, the potentiality for releases of acid waters both during operation and post-closure. Nor is there any way of determining the potential downstream effects in the event of contamination (Question <b><i>Will the</i></b>

					<i>effect be unusual in the area or particularly complex and .Will be a short, medium or long-term effect?</i>
17.	Facilities for long term housing of workers?	Yes	Potentially, yes. No means of determining the environmental effects of the urbanized mine camp, or these associated effects of these structures on the relocated people's environment	A, C, D, F, G, I, J, R, T, Y, CC, FF, GG, LL, QQ, UU, VV, WW	Potentially, yes. No means of determining the environmental effects of the urbanized mine camp, or these associated effects of these structures on the relocated people's environment ( Question <i>Is the project likely to affect any aspects of human or community health or welfare?</i> )
18.	New roads, railways or sea traffic during the construction or functioning?	YES.	Potentially, yes. On the basis of the information in the Technical Memorandum, there is no means of assessing, at this point, the environmental and socio-economic effects of the enhanced traffic and associated environmental impacts.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. On the basis of the information in the Technical Memorandum, there is no means of assessing, at this point, the environmental and socio-economic effects of the enhanced traffic and associated environmental impacts.
19.	New or modified routes for roads, railways, airlines, waterways or other infrastructures, including stations, ports, seaports, airports?	Yes	Potentially, yes. On the basis of the information in the Technical Memorandum, there is no means of assessing, at this point, the environmental and socio-economic effects of the enhanced traffic and associated environmental impacts.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW.	Potentially, yes. On the basis of the information in the Technical Memorandum, there is no means of assessing, at this point, the environmental and socio-economic effects of the enhanced traffic and associated environmental impacts.
20.	Closure or diversion of existing transport routes or infrastructure leading to changes in traffic movements?	NA	Potentially, No. Based on information in the Technical Memorandum, there will only be additional road developments, not road closure.		Likely, No. Based on information in the Technical Memorandum, there will only be additional road developments, not road closure.
21.	Electrical power lines or pipelines, new or modified?	Yes	Potentially yes, but unable to determine, based upon the information in the Technical Memorandum.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially yes, but unable to determine, based upon the information in the Technical Memorandum.
22.	Embanking, damming, realignment, culverting or other changes in water course or aquifer hydrology?	yes	Yes. Details of the tailings disposal facility, mine infrastructure, and water pollution mitigation measures are provided in the Technical Memorandum all of which will require attention in further documents	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Yes. Details of the tailings disposal facility, mine infrastructure, and water pollution mitigation measures are provided in the Technical Memorandum all of

			submissions. There is insufficient information to ascertain the probability of acid waters contamination. There is no information related to the protection of underground waters.		which will require attention in further documents submissions. There is insufficient information to ascertain the probability of acid waters contamination. (Question <i>Is there a high probability of the effect occurring</i> , has not been answered). The damming works, the tailing pond, waste and diversion channel of clean water can affect the environmental media: F,G, Y, Z, CC, EE, FF.
23.	River crossings?	Yes	Although there is extensive documentation in the Technical Memorandum concerning proposed road construction and river diversion, there is no indication of river crossings (bridges). It is presumed that there are no crossings. If they exist, then the potentially significant environmental impacts of said crossings must be addressed within the EIA Report.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Although there is extensive documentation in the Technical Memorandum concerning proposed road construction and river diversion, there is no indication of river crossings (bridges). It is presumed that there are no crossings. If they exist, then the potentially significant environmental impacts of said crossings must be addressed within the EIA Report.
24.	Abstractions or transfers of water from underground or surface waters	Yes	Yes, though more information is required to make such an assessment. Although an assessment of 25 years of river flow data suggests that there is enough water in the river to meet the projects needs without disrupting the water supply of neighbouring localities. There is minimum information on the potential impacts of water withdrawal on communities and other uses.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Yes, though more information is required to make such an assessment. Although an assessment of 25 years of river flow data suggests that there is enough water in the river to meet the projects needs without disrupting the water supply of neighbouring localities. There is minimum information on the potential impacts of water withdrawal on communities and other uses. (Question <i>Is the project likely to affect any aspects of human or community health or welfare?</i> ) or on waters quality (F.,



					Y., CC.) Said information is required.
25.	Water courses or land modifications, affecting water dredging or draining/	Yes	Potentially, yes. Although determined to be otherwise, water demand may eventually exceed supply, which is not raised in the Technical Memorandum. There is not presented a water balance.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. Although determined to be otherwise, water demand may eventually exceed supply, which is not raised in the Technical Memorandum. (Y)
26.	Transport of people or necessary materials during the stages of construction, functioning or decommissioning of use?	Yes.	Potentially, yes. The Technical Memorandum does provide details on the aforementioned activities but does not mentioned the environmental impacts of pre-construction, and although it provides partial information about the noise impacts of transport, it does not asses the potential disrupting impacts of the noise on the people	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. The Technical Memorandum does provide details on the aforementioned activities but does not mention the environmental impacts of pre-construction (Question –Will the Project Activity have effects on existing or future lands uses?), and although it provides partial information about the noise impacts of transport ( GG.) it does not asses the potential disrupting impacts of the noise on the people (Question: Will many people be affected?)
27.	Dismantling or putting out of use for longer periods, or restoration works.	Yes	A detailed closure plan will be required in the EIS, with evidence that closure issues have been taken into consideration from beginning of the project design.	A, B,C, D, E, O, T, LL, PP, QQ, RR, TT	A detailed closure plan will be required in the EIS, with evidence that closure issues have been taken into consideration from the beginning of the project design.
28.	Activities which will continue during the putting out of use and likely to have an impact on the environment?	Yes	Yes, depending upon quality and detail of the decommissioning strategy. This is presently unknown and will continue to be so until more information is provided. Of course, the actual environmental impacts will be unknown until the closure campaign commences in 30 years.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes, depending upon quality and detail of the decommissioning strategy. This is presently unknown and will continue to be so until more information is provided. Of course, the actual environmental impacts will be unknown until the closure campaign commences in 30 years. (Question: Will the effect be permanent rather than temporary), although the Technical Memorandum devotes only seven

					pages of text to the mine closure plan.
29.	Permanent or temporary population flow?	Yes	Potentially, yes there are possible impacts. There are no currently assessment methods for environmental and socio-economic effects resulted from the increased traffic. More detail will be required.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes there are possible impacts. The working camp will be located near to the processing installation and will have drinking water, sewage and waste disposal system. Water supply systems will be built and electric generators will be put in function close to the installations area. More detail will be required.
30.	Introducing non native species?	Yes	Potentially, yes, though the Technical Memorandum makes no mention of these issues, despite the reality that mine supplies will originate from different corners of the globe. Appropriate prevention measures will be required.	K	Potentially, yes though the Technical Memorandum makes no mention of this issues, despite the reality that mine supplies will originate from different corners of the globe (K). Appropriate prevention measures will be required.
31.	Loss of certain native species or genetic diversity?	yes	Yes. Species of hornbeam, pine mixed coniferous, mixed deciduous, secondary meadow; beech and fir are comprised in the existing forest which will be removed. Forty-six bird species, six mammals and two lizard species were identified in the Technical Memorandum, although potential impacts on biodiversity receive little coverage. More details are needed.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Yes. Species of hornbeam, pine mixed coniferous, mixed deciduous, secondary meadow; beech and fir comprise the existing forest which will be removed. Forty-six bird species, six mammals and two lizard species were identified in the Technical Memorandum, although potential impacts on biodiversity receive little coverage. With some 50+ species, there may be enhanced effects (J and K.).
32.	Any other actions?	Yes	Potentially, yes. There is little mention in the Technical Memorandum on how the waterproof liner of the tailing pond will be used and how will the acid water dams be waterproof.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. There is little mention of the use of liners in both the containment facilities and below the heaps in the Technical Memorandum <i>(Questions Is the project likely affected the physical condition of</i>

					<i>any environmental media? And Are the releases form the Project likely to have effects on the quality of any environmental media?)</i>
Question: Will the Project use one of the following natural resources or any other non-regenerating or limited resources?					
33.	Land, particularly virgin (natural) land or agricultural land?	Yes	Yes, land resources – depending on re-vegetation strategy near dumped materials, warehouses or waste disposal sites. The fertile soil resources are limited and there is no description of the situation in which the rehabilitation of the area is realized for agriculture/forestry purpose. People will also be displaced but how they cope in their new lifestyles cannot be predetermined. The majority of human settlement issues – one of the most important aspects of the project – receive only brief coverage in the Technical Memorandum.	A, B, C, D, E, G, J, K, L, M, P, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes, land resources (J, K, M, P, T, U, W – depending on revegetation strategy near dumped materials, warehouses or waste disposal sites). The fertile soil resources are limited and there is no description of the situation in which the rehabilitation of the area is realized for agriculture/forestry purpose. People will also be displaced but how they cope in their new lifestyles cannot be predetermined. The majority of human settlement issues – one of the most important aspects of the project – receive only brief coverage in the Technical Memorandum. (Question – Is the Project likely to affect any aspects of human or community health or welfare?)
34.	Water?	Yes	Yes, water related issues have been sufficiently covered so far in the Technical Memorandum.	F, G, I, K, M, O, Q, W, Y, Z, AA, CC, DD, EE, FF, LL, PP, TT	Yes, water related issues have been (by comparison) significantly covered so far in the Technical Memorandum. Even if many tests have been conducted they are not sufficient for environmental impact assessment on the important wetlands, water courses and other water bodies (F). The Technical Memorandum provides few conclusions on the existent contamination of the soil (the area has been used for mining purposes

					for 2000 years). Additionally, there is no sufficient information in order to conclude if the existing pollution levels plus the mine generated pollution will have irreversible effects. The working camp will be located near to the processing installation and will have drinking water, sewage and waste disposal system. Water supply systems will be built and electric generators will be put in function close to the installations area.
35.	Minerals?	Yes	Impacts of limestone quarries need to be considered, plus disposal of sludge from water treatment	A, B, C, D, E, F, G, I, J, K, L, M, Q, S, T, U, V, X, Y, Z, AA, CC, EE, FF, GG, HH, II, PP, QQ, RR, UU, VV, WW	Impacts of limestone quarries need to be considered, plus disposal of sludge from water treatment
36.	Aggregates / compounds?	Yes	The issue of re-using tailings/sterile is discussed in the Technical Memorandum. There are likely additional environmental impacts form this action.		The issue of re-using tailings/sterile is discussed in the Technical Memorandum. There are likely additional environmental impacts form this action.
37.	Forests and wooden material?	Yes	Potentially, yes. Issue insufficiently presented in the Technical Memorandum.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, QQ, RR, TT, VV, WW	Potentially, yes. Issue insufficiently presented in the Technical Memorandum (PP, QQ., and RR.).
38.	Energy, including electricity and fuels?	Yes.	Potentially, yes. Briefly described in the Technical Memorandum. Mitigation and prevention mechanisms for resulting pollution are not addressed.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. Briefly described in the Technical Memorandum. Mitigation and prevention mechanisms for resulting pollution are not addressed (X. and CC.)
39.	Any other resources?	NA			
<p>Question: Does the Project imply use, disposal, transport, dealing with or production of substances or materials which may damage the health of the population or the environment, or increased fears that the project would represent a risk for the health of the population?</p>					

40.	Does the project imply the use of substances or materials which may be risky or toxic for the health of the population or the environment (flora, fauna, water supply)?	Yes	Potentially yes. Mismanagement could lead to contaminated water and soils. Cyanide and acid waters are treated as toxics in the Technical Memorandum. However, details of disaster management plan, cyanide and acid waters management strategies, including issues on transport routes must be further provided.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW.	Potentially yes. Mismanagement could lead to contaminated water and soils. (CC, EE, FF). Cyanide and acid waters are treated as toxics in the Technical Memorandum. However, given the recent performance of the industry in the region (in Eastern Europe), details of disaster management plan, cyanide and acid waters management strategies supplied in the Technical Memorandum are insufficiently answered to date <i>Are releases from the Project likely to have effects on the quality of any environmental media?</i>
41.	Will the project lead to modifications in diseases incidence? (e.g., disease generated by insects or by contaminated or polluted water)	Yes	Potentially, yes. The short-term impacts of noise-induced ailments are not addressed in the Technical Memorandum.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. The short-term impacts of noise-induced ailments are not addressed (GG.) in the Technical Memorandum.
42.	Will the project affect the welfare of the population (e.g. by changing the life conditions?)	Yes	Yes. Displacement and relocations of the local population are envisaged. The Technical Memorandum provides insufficient information on age, opinion of the local population and on quality-of-life assessment.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Yes. . Displacement and relocations of the local population are envisaged. The Technical Memorandum provides insufficient information on age, opinion of the local population and on quality-of-life assessment. Is the Project Likely to affect any aspects of human or community health or welfare?
43.	<b><i>Are population groups particularly vulnerable, which are likely to be affected by the project (e.g. hospitalized patients, old people)?</i></b>	<b>Yes.</b>	Potentially, yes. The impacts of the project relocation program cannot be fully determined at this point on the basis of the information provided in the Technical Memorandum.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. The impacts of the project relocation program cannot be fully determined at this point on the basis of the information provided in the Technical Memorandum.
44.	<b><i>Any other causes?</i></b>	<b>Yes.</b>	Potentially, yes, although the impacts of the		Potentially, yes, though the

			project relocation program cannot be fully determined at this point on the basis of the information provided in the Technical Memorandum.		impacts of the project relocation program have not been sufficiently addressed in the Technical Memorandum.
Question: Will the project produce solid waste during the construction, functioning or ceasing the activity?					
45.	<b><i>Excavated materials, sterile or mining waste?</i></b>	<b><i>Yes.</i></b>	Yes. The impacts of the waste dump heaps cannot be determined on the basis of the information provided.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, DD, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. The developer must present within the EIA Report the necessary measures in order to avoid, mitigate and compensate the negative significant impact. The impacts of the waste dump heaps can not be determined on the basis of the information provided. ( In particular, consider DD, EE and CC. )
46.	<b><i>Urban waste (domestic and/ or commercial)?</i></b>	<b><i>Yes.</i></b>	Likely yes, though the impacts of urban waste cannot be determined on the basis of the documentation and a waste management plan should be developed. There is the potential for environmental concern.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, DD, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Likely yes, though the impacts of urban waste cannot be determined on the basis of the documentation and a waste management plan should be developed. There is the potential for environmental concern ( Particularly DD, EE and CC. ). The Technical Memorandum does not mention urban waste- a potentially serious issue given the presence of a mining complex of 700 people.
47.	<b><i>Hazardous or toxic waste (including radioactive waste)?</i></b>	<b><i>Yes.</i></b>	Potentially, yes. Appropriate cyanide detoxification ( i.e. INCO SO <sub>2</sub> ) installations will be used. Their effectiveness, however, cannot be determined at this point.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q R., T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. Appropriate cyanide detoxification ( i.e. INCO SO <sub>2</sub> ) installations will be used. Their effectiveness, however, cannot be determined at this point.
48.	<b><i>Other waste resulted from industrial processes?</i></b>	<b><i>Yes.</i></b>	Potentially, yes. Cannot be determined at this point. The Technical Memorandum does not present how these wastes will be monitored.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. Cannot be determined at this point. The Technical Memorandum does not present how these wastes will be monitored. (At least FF., EE. and X.)

49.	<i>A surplus of products?</i>	<i>Yes.</i>	Potentially, yes. It is planned the tailings will be managed appropriately. Although the management details are stipulated in the Technical Memorandum, the effectiveness of tailings management cannot be determined until operations commence. The Technical Memorandum is lacking information on responses to potential crises resulting from tailings mismanagement.	A, B, C, D, F,Y, Z, CC, EE, FF	Potentially, yes. It is planned the tailings will be managed appropriately. Although the management details are stipulated in the Technical Memorandum, the effectiveness of tailings management cannot be determined until operations commence. The Technical Memorandum is lacking information on responses to potential crises resulting from tailings mismanagement (EE.).
50.	<i>Sewerage sludge or from waste water treatment plant (WWTP)?</i>	<i>Yes.</i>	Potentially, yes. Treated water will be expected to meet all regulatory requirements. .	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU VV, WW	Potentially, yes. Treated water will be expected to meet all regulatory requirements. Outcome to be determined, after which, the question <b><i>Is there a risk that environmental standards will be breached?</i></b> must be answered.
51.	<i>Waste resulted from constructions or demolitions?</i>	<i>Yes.</i>	Yes. Waste/sterile rock has acid water potential. Management system for safe disposal will have to be developed.	A, C, D, F, G, I, J, R, T, Y, CC, FF, GG, LL, QQ, UU, VV, WW	Yes. Waste rock has acid water potential. Management system for safe disposal will have to be developed.
52.	<i>Machines or equipments in excess or which are no longer used?</i>	<i>Yes.</i>	Yes. Potential waste impact assessment (ferrous, non-ferrous, plastic, textiles, electric, electronics, house-hold) resulted from machines or equipment in excess or which are not longer used.	A, C, D, G, I, J, R, T, FF, GG, LL, QQ, UU, VV, WW	Yes. Potential waste impact assessment (ferrous, non-ferrous, plastic, textiles, electric, electronics, house-hold) resulted from machines or equipment in excess or which are not longer used. The existing mining transport system, the crushing and processing installation shall be kept to be reused.
53.	<i>Contaminated soils or other materials?</i>	<i>Yes.</i>	Yes. This is because the surface soils and groundwater could become contaminated if they are not controlled. Pollutant-receiver pathways are discussed but they are insufficiently addressed in the Technical Memorandum.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Yes. This is because the surface soils and groundwater could become contaminated if they are not controlled. Pollutant-receiver pathways are discussed but they are insufficiently addressed in the Technical Memorandum.

54.	<b><i>Agricultural wastes?</i></b>	<b><i>Yes.</i></b>	Yes. Topsoil will be removed and stored in stockpiles. The Technical Memorandum does not detail the effect the hoarding of topsoil will have on the locals or ecosystems.	A, C, D, F, G, I, J, R, T, Y, CC, FF, GG, LL, QQ, UU, VV, WW	Yes. Topsoil will be removed and stored east of Cirmic Pit at the head of the Rosia Valey. The Technical Memorandum does not detail the effect the hoarding of topsoil will have on the locals or ecosystems.
55.	<b><i>Any other wastes?</i></b>	<b><i>Yes</i></b>	Yes. The impact assessment of other solid wastes generated by the transport activity (batteries and used car accumulators/cells, used tyres), of the stone quarries activity and other related activities must de carried out.	A, C, D, F, G, I, J, R, T, Y, CC, FF, GG, LL, QQ, UU, VV, WW	Yes. The impact assessment of other solid wastes generated by the transport activity (batteries and used car accumulators/cells, used tyres), of the stone quarries activity and other related activities must de carried out.
Question: Will the Project release pollutants or any other hazardous, toxic or noxious substances to air?					
56.	Emissions resulted from burning fossil fuels from stationary or mobile sources?	Yes.	Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.
57.	Emissions resulting from production processes?	Yes	Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.
58.	Emissions resulted from manoeuvring materials, including disposal or transport?	Yes.	Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU VV, WW	Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.
59.	Emissions resulted from the construction activities, including technical installations and equipments?	Yes.	<b><i>Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.</i></b>	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU VV, WW	<b><i>Yes. Expected soil loss and contamination from release of fuels. Impact scenarios are not provided in the Technical Memorandum.</i></b>
60.	Dust or odours resulted from manoeuvring materials, including construction materials, waste water and waste material?	Yes.	Yes. Agricultural and forest land use degradation as a result of a deposition of particulates. Impact scenarios are not provided in the Technical Memorandum.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. Agricultural and forest land use degradation as a result of a deposition of particulates. Impact scenarios are not provided in the



					Technical Memorandum, which prevents from addressing items X. and FF.
61.	Emissions resulted from waste incineration?	NA			Technical Memorandum does not explain what the impacts of ‘downstream’ waste disposal are in this context, making applicable the question, <i>Will the effect extend over a large area?</i>
62.	Emissions resulted from open air waste burning (scraps from cutting or construction works)?	NA			Potentially, yes though it is anticipated that construction works may yield very little scrap waste. This needs to be confirmed through further information from RMGC.
63.	Emissions resulted from any other source?	Yes.	Potentially yes, though it depends on the diligence of on-site management teams. The details supplied in the Technical Memorandum are insufficient to make it possible to elaborate working scenarios.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially yes, though it depends on the diligence of on-site management teams. The details supplied in the Technical Memorandum are insufficient to make it possible to elaborate working scenarios. The EIA Report must assess waste/residual gases and suspended particles, cyanides reservoirs, acid washing installations, melting furnaces, CaO silos, furnaces and hydration installation.
Question: Will the Project cause noise and vibration or release of light, heat energy or electromagnetic radiation?					
64.	From exploitation of the equipments, such as engines, airing technical installations, crushing mills?	Yes.	Potentially yes although this is uncertain as mitigate measures to be implemented have not been sufficiently addressed in the Technical Memorandum.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially yes though this is uncertain as mitigate measures to be implemented have not been sufficiently addressed in the Technical Memorandum.
65.	From industrial processes or similar to those?	Yes.	Yes. The impact will be temporary, but there is a significant impact caused by noise.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK,	Yes. Equipment will be used with appropriate silencers, and accurate blast drilling will be carried out.

				TT, UU, VV, WW	Impacts will be temporary but may have significant noise impacts.
66.	From demolitions or constructions?	Yes	Yes. Impacts will be temporary/intermittent but will likely have significant noise impact.	A, C, D, F, G, I, J, R, T, Y, CC, FF, GG, LL, QQ, UU, VV, WW	Yes. Impacts will be temporary/intermittent but will likely have significant noise impact.
67.	From explosions or electric accumulators use?	Yes.	Potentially, yes. Impacts will be temporary/intermittent but will likely have significant noise impact	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially, yes. Millisecond delays in blasting will occur to reduce the explosive charge and one blast will occur a day. Noise will be significant but temporary.
68.	From construction or operational traffic?	Yes.	Potentially, yes. The Technical Memorandum does not identify the likely impacts resulting from vehicle use within an area where few motor vehicles were used before.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially, yes. The Technical Memorandum does not identify the likely impacts resulting from vehicle use within an area where few motor vehicles were used before.
69.	From illumination or cooling systems?	Yes.	Potentially yes. Not enough detail in the TM to determine impacts.		Not enough detail in the TM to determine impacts.
70.	From sources of electromagnetic radiations (considering the effects on the population or on the eventual sensitive equipments nearby)?	NA	NA		NA
71.	From any other sources?	Yes	Potentially yes. Use of millisecond delays will significantly reduce air blast.	A, C, GG, HH, II	Potentially yes. Use of millisecond delays will significantly reduce air blast.
Questions: Will the Project lead to risks of contamination of land or water from releases of pollutants on the ground or into sewers, surface waters, groundwater, costal waters or the sea?					
72.	From handling, storage, use or spillage of hazardous or toxic materials?	Yes	Potentially, yes. Sodium cyanide spillage is possible. Impacts depend in part upon the diligence of management plans and activities.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes. Sodium cyanide spillage is possible. Impacts depend in part upon the diligence of management plans and activities.
73.	From discharges of sewage or other effluents (either treated or not) to water or the land?	Yes	Potentially, yes. Not enough details in order to assess the impact.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK,	Potentially, yes. No impact scenario provided in the Technical Memorandum.

				TT UU, VV, WW	
74.	By deposition of pollutants emitted to air, onto the land or into water?	Yes	Potentially, yes. Not enough details in order to assess the impact.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially, yes though no impact scenario is offered in the Technical Memorandum. The contamination due to waste chemical substances, fuels, particles, the emissions of the processing installations and NO <sub>x</sub> , and SO must be assessed.
75.	In there a long term risk for the pollutants resulted from these sources to be accumulated in the environment?	Yes	Potentially, yes. No impact scenario has been identified in the Technical Memorandum.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially, yes. No impact scenario has been identified in the Technical Memorandum. There is a risk of discharge of mining acid waters, mining dust, reagents and smoke.
Question: Is there a risk of accidents during construction or operation of the project which could affect human health or the environment?					
76.	From explosions, spillages, fires, etc., from storage, handling, use or production of hazardous or toxic substances?	Yes	Yes. Cyanide is lethal to human health, and wildlife. Acid waters can damage the surface and ground waters.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, MM, NN, OO, PP, QQ, RR, TT, VV, WW	Yes. Cyanide is lethal to human health, and wildlife. Acid waters can damage the local rivers (MM.,NN.,OO.,PP.,QQ, and RR) There is a risk of pollution with acid waters.(BB, CC, EE, FF).
77.	From events beyond the limits of normal environmental protection (e.g. failures of the pollution control systems)?	Yes	Yes. Cyanide is lethal to human health, and wildlife. Acid waters can damage the surface and groundwater.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, MM, NN, OO, PP, QQ, RR, TT, VV, WW	Yes. Cyanide is lethal to human health, and wildlife. Acid waters can damage the local rivers (MM.,NN.,OO.,PP.,QQ, and RR) There is a risk of pollution with acid waters.(BB, CC, EE, FF).
78.	Could the project be affected by natural disasters which lead to the damage of the environment ( e.g. floods, earthquakes, land sliding, etc.)?	Yes	Potentially yes. Precipitation leading to floods, earthquakes, both of which are insufficiently covered in the Technical Memorandum but, it is understood that they shall be addressed in future document submissions.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially yes. Precipitation leading to floods, earthquakes, both of which are insufficiently covered in the Technical Memorandum but, it is understood that they shall be addressed in future document submissions.
Question: Will the Project result in social changes?					

79.	Changes in population size, age, structure, social groups, etc.?	Yes.	Yes. Damage to cultural sites, loss of livelihood, and disruption of traditional values.	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Yes. Damage to cultural sites, loss of livelihood, and disruption of traditional values.
80.	By resettlement of people or demolition of homes or communities or community facilities? ( e.g. schools, social facilities, hospitals)	Yes.	Yes. Damage to cultural sites, loss of livelihood, and disruption of traditional values.	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Yes. Damage to cultural sites, loss of livelihood, and disruption of traditional values.
81.	Through in-migration of certain inhabitants who have come from other locations or creation of new communities?	Yes.	Potentially, yes. The technical memorandum does not touch upon the potential impacts of the relocated, which encompasses the entire spectrum of the criteria checklist	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Potentially, yes. The technical memorandum does not touch upon the potential impacts of the relocated, which encompasses the entire spectrum of the criteria checklist
82.	By placing increased demands on local facilities or services, such as: housing, education, and health?	Yes.	Potentially, yes. Properties, as well as businesses will be replaced. Outcome cannot be predicted without further information.	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Potentially, yes. Properties, as well as businesses will be replaced. Outcome cannot be predicted without further information( to be submitted by RMGC)
83.	By creating jobs during construction or operation or, causing the loss of jobs with effects on unemployment and the economy?	Yes.	Potentially, yes. The project will generate a small number of job opportunities for locals. And small businesses are being supported. But these efforts may not be sustainable. Economic factors have not been addressed in their entirety by the Technical Memorandum.	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Potentially, yes. The project will generate a small number of job opportunities for locals. And small businesses are being supported. But these efforts may not be sustainable. Economic factors have not been addressed in their entirety by the Technical Memorandum (VV).
84.	Any other causes?	Yes.	Potentially yes. The displaced people could benefit by the improvement of the access to services; this additional aspect is worth being taken into consideration.	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Potentially yes. The displaced people earn subsistence wages and could benefit tremendously from the improved access to services. This deserves further consideration.
Question: Are there any other factors which should be considered?					
85.	Will the project lead to pressure for consequential, which could have significant impact on the environment such as more houses, new roads, support	Yes	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in the technical Memorandum	A, B, C, D, T, PP, QQ, RR, TT, UU, VV, WW	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in the technical Memorandum

	industrial units or new utilities, etc.?				
86.	Will the project lead to development of supporting utilities, ancillary development or development stimulated by the project which could have impact on the environment, e.g.: Support infrastructure (roads, power supply, waste treatment, etc.)? Development of houses? Extractive industry? Supply industry? Others?	Yes	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in the technical Memorandum.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in the technical Memorandum.
87.	Could the project limit the subsequent modality of using the site, so that there will be a significant effect on environment?	Yes	Potentially yes, but this cannot be determined at this point on the basis of the information provided in the technical memorandum. The real test of the environmental effects takes always place during the operation as well as decommissioning and post-closure.	A, B, C, D, E, G, J, K, L, M, S, T, U, V, W, X, Y, Z, AA, BB, CC, EE, FF, GG, HH, II, KK, TT, UU, VV, WW	Yes. Mining activities are not carried out to full capacity due to possible future contaminations as a result of decommissioning. This requires further information and discussion.
88.	Will the project set a precedent for later developments?	Yes.	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in the Technical Memorandum. The area is already affected by the previous mining activities and land clearing	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in the Technical Memorandum. The few proposed mitigation measures mentioned so far are encouraging but they can only be evaluated once they are further studied with more information to be provided. Of course, the real test of the environmental effects takes always place during the operation as well as decommissioning and post-closure.
89.	Will the project have cumulative effects due to the proximity to other existing or planned projects with similar effects?	Yes.	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in Technical memorandum.	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Potentially, yes, but this cannot be determined at this point on the basis of the information provided in Technical memorandum.
90.	Does the project refer to permanent decommissioning of certain activities? In this case, could a post-decommissioning impact occur?	Yes	Yes. Acid water could occur. The effects depend on how effectively the closure plan is executed. Significantly, more information on the plan and implementation measures is	A, B, C, D, E, F, G, I, J, K, L, M, O, Q, R, T, U, V, X, Y, Z, BB, CC, EE, FF, GG, II, LL, PP, RR, TT, VV, WW	Yes. Acid water could occur. The effects depend on how effectively the closure plan is executed. Significantly, more information on

			<p>required.          Although in Chapter 4 “Decommissioning of the mining activities and environmental rehabilitation” it is stated that land covering and re-vegetation will be carried out. It is necessary a plan for replanting the forest vegetation and its monitoring.</p>		<p>the plan and implementation measures is required.          Although in Chapter 4 “Decommissioning of the mining activities and environmental rehabilitation” it is stated that land covering and re-vegetation will be carried out. It is necessary a plan for replanting the forest vegetation and its monitoring.</p>
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NOTE:

NA = not applicable;

TMF = Tailing Management Facility

## **Management Plan for the Archaeological Patrimony from Roşia Montană Area**

### **INTRODUCTION**

- Juridical status and historic significance of the site

#### **1. Site description**

##### 1.1 General information:

- Administrative and topographic location, brief description
- Juridical status
- Illustration: maps, plans, photos.

##### 1.2. Scientific information:

- Definition of the general framework: archaeological information, anthropologic information, ethnographic information, historical information, history of art, architectural and architectonic information, technologic information regarding the site and its neighbourhood.

##### 1.3. Interests:

- Public and/or private interests, property types, administration rights, concessions, etc.
- Use of soil and resources, category of land use (including a brief history).
- Economic interests related to the site, including tourism.

#### **2. Assessment and objectives**

##### 2.1 Conservation status of the site:

- Defining the limits and the spatial distribution of the cultural resources.
- Classification as historic monument, its inclusion National Archaeological repertory, including brief information about this status.
- The indication of possible operation, which might affect the site or the threatening to the site (the risk factors that act independently or together).

##### 2.2 Assessment of the site and its potential:

- Data about the archaeological artefacts and the archaeological potential of the site (construction materials and techniques, spatial distribution, the location of the constructed structures, etc.).
- Cultural values in connection with the site (unicity, local/county/regional/national/international significance, memorial or artistic value, etc).
- Contemporary economic values and their use.

##### 2.3 Identification and confirmation of the important elements for site management:

- Ideal objectives of management.
- Factors that influence the management.
- Operational objectives and managerial options.
- Management options about research, conservation and restoration.
- Options regarding the use of the site.
- Options regarding the study and research.

- Options regarding the education and public dissemination.

### **3. Site management**

#### 3.1 Projects:

- The titles of the projects, identification elements, classification.
- The descriptions of the projects.
- A register of the interventions (project register).

#### 3.2 Timetable:

- Annual work plan (action plan).
- Medium and long-term work plans.
- Relationships between the annual work plan and the medium and long term work plans.

#### 3.3. Works and costs:

- Different works and interventions categories upon the site and their costs.

### **4. RERERENCES**

- Bibliographic references.
- List of category for unpublished information and artefacts from the site archive.



## **Management Plan for the Historic Monuments and Protected Areas of Roșia Montană**

### **INTRODUCTION**

- Juridical status and historic significance of the historic monuments and protected areas of Roșia Montană

### **1. Site description (historic monuments and protected areas)**

#### 1.1. General information:

- Administrative and topographic location, brief description
- Juridical status
- ILLUSTRATION: maps, plans, photos.

#### 1.2. Scientific information:

- Definition of the general framework: archaeological information, anthropologic information, ethnographic information, historic information, the history of art, architectural and architectonic information, technologic information regarding the historic monuments and protected areas and the area which they are located in.

#### 1.3. Interests:

- Public and/or private interests, property types, administration rights, concessions, etc.
- Use of soil and resources, category of land use (including a brief history).
- Economic interests related to the site, including tourism.

### **2. Assessment and objectives**

#### 2.1 Conservation status of the historic monument and of the protected areas:

- Defining the limits and the spatial distribution of the cultural resources.
- Classification as historic monument, its inclusion in the National List of Historic Monuments, including a brief information about the evolution of this legal status of protection.
- The indication of the possible operations, which might affect the site or the threatening to the historic monuments and the protected areas (the risk factors that act independently or together).

#### 2.2 Assessment of the historic monuments and the protected areas and their potential:

- Data about the historic monuments and protected areas (construction materials and techniques, spatial distribution, the location of the constructed structures, etc.).
- Cultural values in connection with the historic monuments and protected areas (unicity, local/county/regional/national/international significance, memorial, legendary or artistic value, etc).
- Contemporary economic values and their use.

#### 2.3 Identification and confirmation of the important elements for the management of historic monuments and the protected areas:

- Ideal objectives of management.
- Factors that influence the management.
- Operational objectives and managerial options.
- Management options about research, conservation and restoration.
- Options regarding the use of the historic monuments and protected areas.

- Options regarding the study and research.
- Options regarding the education and public dissemination.

### **3. Management of historic monuments and protected areas**

#### 3.1 Projects:

- The titles of the projects, identification elements, classification.
- The descriptions of the projects.
- A register of the interventions (project register).

#### 3.2 Timetable:

- Annual work plan (action plan).
- Medium and long-term work plans.
- Relationships between the annual work plan and the medium and long term work plans.

#### 3.3. Works and costs:

- Different works and interventions categories upon the site and their costs.

### **4. RERERENCES**

- Bibliographic references.
- List of category for unpublished information about historic monuments and protected areas.

**Preliminary Proposal for the Content Requirements of Environmental Impact Assessment  
Report of Rosia Montana Mining Project.**

The Environmental Impact Assessment documentation beyond the criteria laid down in Annex 2 of Regulation No. 863 of 26.09.2002 of the Romanian Ministry of Waters and Environmental Protection, should be in compliance with the requirements of the following relevant international legislation:

- *UNECE Convention on Environmental Impact Assessment in a Transboundary Context, (Espoo Convention)*
- *Council Directive 96/82/EC of 9 December 1996 on the control of major-accident hazards involving dangerous substances (hereinafter referred to as the Seveso II Directive)*
- *UNECE Convention on the Transboundary Effects of Industrial Accidents, Helsinki (Industrial Accidents Convention)*

The EIA documentation should include a detailed analysis of all the activities with a potential to cause transboundary environmental effects during its establishment, operation and after closure.

Within the above general requirements, it should also include the detailed description of the following criteria:

1. General information:

- the description of the siting of proposed individual facilities (tailings pond, mining waste disposal site, technology units, etc.) should include alternative siting modes
- the documentation should include a detailed description and material balance of the hazardous and toxic substances used
- as regards environmental conditions, it should characterise the so-called “zero” (i.e. current) conditions for each environmental media and should include detailed data for at least the previous 5 years;

2. Technological Processes:

- description of the proposed technologies should include alternative technologies. It should provide a justification of the advantages of the method to be applied in comparison with other methods, an analysis of the compliance with the Best Available Techniques (BAT), a description of the relevant international experience and references, and, primarily the applications in Europe (reference data from at least two facilities of similar size and using similar technology);
- the detailed description of the technology should include descriptions of all the processes and material balances of the materials used in each process, including their future handling;
- it should include a description of the typical technological/process parameters of operation and the technical and organisational (management) measures for the prevention of major industrial accidents;

- as regards facilities with a risk of major accidents, it should include the technical parameters used in the design procedure;
- the documentation should include a detailed cyanide management plan (including the treatment of cyanide-containing material disposed in the tailings pond), a detailed analysis of the cyanide detoxification method, precise listing of the relevant limit values, provisions of the relevant EU and other international legislation, and compliance with the Best Available Techniques (BAT);

### 3. Waste management:

- it should include detailed information (including material balance) on the quantities, composition, and further treatment and transportation of technological by-products and wastes;
- it should include detailed information on the method of disposal and treatment of mining and other waste;

### 4. Potential environmental effects and related mitigation measures, emphasizing the factors generating possible transboundary effects, transboundary processes of effects and transboundary effects:

- it should include a detailed description of the expected effects on each environmental media during the construction, normal operation, and operation periods of potential breakdowns and after closure. Model calculations should be used to demonstrate the expected migration with special attention to the transboundary effects, and the range should be presented in maps;
- an analysis of the effects of the effluent waste water on recipient water courses, especially of the ecological risks caused by hazardous substances;
- information on EU and other legislation that waste water treatment should be in compliance with and on the method of treatment of the seepage water from the tailings pond that will be used to achieve this;
- it should provide an analysis of the risks to surface and subsurface water bodies taking into account the objectives of the EU Water Framework Directive (“good” chemical and ecological status, and potential) in particular.
- taking into account the possible transboundary effects, an analysis of the risks to nature conservation areas possibly caused by the investment, with particular regard to nature conservation areas of international importance (Natura 2000, Ramsar Areas)
- assessment of the effects of the facility on the ecosystem depending on irreversible changes in land uses;
- assessment of the risks to biocenoses characteristic of region caused by land uses related to the investment, and, in this context, the potential for ensuring the needs of the local protected and highly protected plant and animal species
- detailed analysis of the potential environmental effects of the tailings pond, mining waste disposal sites and waste landfills, and a description of the proposed engineering protection measures;

- detailed information on the exact composition (i.e., cyanide concentrations, concentration of heavy metals, water content, etc.) of the material to be disposed at the tailings pond, and on the hydrological and other parameters of the recipient water courses;
- whether environmental management systems are to be used during the establishment and operation of the facility, and if yes, what environmental management systems;

#### 5. Analysis of the alternatives:

- assessment of the environmental effects of non-investment and alternative solutions and comparison with the environmental effects of the proposed investment;

#### 6. Monitoring:

- detailed description of the proposed environmental monitoring systems (for each environmental media) for the pre-project status, for the period of status and for the status following closure, with special regard to the conditions of surface and subsurface water bodies;
- description of the proposed method for ensuring access to the data;
- information on the establishment of a system that would monitor the stability of the dam, including its exact description and site of installation;

#### 7. Emergency situations:

- detailed analysis of the mode of transportation of cyanide in solid form to the site, safety requirements on transportation, and further uses;
- detailed analysis of the safety requirements related to the dam of the tailings pond and a precise description of the proposed structure of the dam;
- technical requirements the compliance of which would be guaranteed during construction and operation of the dam and the method of monitoring such compliance;
- detailed analysis of the proposed measures to control the adverse effects of extreme weather conditions;
- analysis of the proposed measures to control the effects of natural disasters (e.g., earthquakes, floods, landslides);
- as regards emergency situations, precise information on the proposed measures with special regard to transboundary effects, especially water pollution events;
- conduct an internationally recognised and accepted risk assessment with respect to emergency situations for each possible process option;
- design a multi-step protection and remediation system for controlling emergency situations;
- analyse by migration models the potential effects and consequences of possible accidents;
- detailed analysis of the legislation and international conventions that the contingency plans would be in compliance with;
- in case of an accident, the system of notifications to be used in order to mitigate the possible effects;

- whether liability insurance would be effected in order to provide compensation for pollution events caused by potential breakdowns;
- prepare a set of measures related to the remediation and compensation in case of environmental damage;
- detailed description of the proposed measures to prevent major industrial accidents and to control their effects;
- detailed description of the objectives of the measures related to the prevention of major industrial accidents, and of the safety management systems related to establishment, operation and after closure;
- using internationally accepted methods, identify the major industrial accident hazards of the facility and the characteristic accident scenarios for the facility, and analyse the potential consequences;
- description of the alarm, control and remediation systems to be used for emergency tasks, as well as of the related infrastructure;

#### 8. Difficulties:

- the analysis should include a listing of the deficiencies and uncertainties in knowledge;

#### 9. Measures following closure of the facility:

- for the after closure period of the mine, a detailed description of the method of recultivation (for each facility) including the names of the individuals responsible and the exact costs;
- information on the method of ensuring the appropriate funds required for the measures following the closure of the mine;
- detailed description of the proposed technical monitoring measures during the implementation; internationally accepted technical monitoring systems should be established;

#### **In addition to the above criteria, we propose to include the following criteria in the requirements on content:**

- assessment of the effects of the gold mine and related activities on the historical, cultural and architectural values of Verespatak and buildings classified as ancient monuments;
- description of the future of the archeological values (mines from the Roman Age, mining equipment, objects, churches, cemeteries, buildings classified as ancient monuments) located in Verespatak and its environs;
- description of theoretical value of the mines from the Roman Age located in the mountains of Verespatak and its environs, and of the archeological values located in such mines;
- assessment of the natural values and biodiversity of the region;
- assessment of the social and economic effects of the investment, including assessment of the effect of the investment on the subsistence of the local population with special regard to the period following the 17-year lifetime of the mine;
- analysis of the relationship of the investment with the sustainable development of the region;

- assessment of the potential income from tourism in Verespatak and its environs in case of non-investment provided by the Roman mines and objects in Kirnyik Mountain if they were explored and made publicly visitable;
- analysis of alternative business activities in Verespatak and the neighbouring villages in case of non-implementation of the gold mine;
- effects of implementing the gold mine on the chances of alternative economic development and activities (e.g., ecotourism, agriculture);
- assessment of the expected social and economic damage from the classification of the region as a “monoindustrial zone” that entails prohibition of all business activities (opening and operation of new shops and guest-houses, ecotourism) that are not related to the gold mine project;
- analysis of the financial calculations related to the operation and recultivation of the mine.