



Ref.: 17-314/GDN/ESA/qt
Re.: NIMOS Comments Draft Scoping Report and Terms of Reference Sabajo Expansion

Date: 20 June 2017

NIMOS Review of the Draft Scoping Report and Terms of Reference of the Environmental and Social Impact Assessment Study of the Sabajo Expansion of the Merian Gold Mine in Suriname

Background

On May 31st, 2017 NIMOS received a draft Scoping report for the preparation of the Environmental and Social Impact Assessment (ESIA) of the Sabajo Expansion of the Merian Gold Mine in Suriname. The project was categorized as a Category A project, which means that a full ESIA is required. The comments in this report (see table below) are based on the draft Scoping report.

Comments

Page	Subject	Comment
<p>General:</p> <ul style="list-style-type: none"> • For the layout of the document it is advisable that each new chapter should begin on a new page. • Please include only the relevant stakeholders, legislation and conventions etc. for this project. Also discuss the relevance of each stakeholder, legislation and convention and how you will make sure to apply the legislation and conventions in this project. • Please also include a closure and rehabilitation section in this document • Please be consistent in: <ul style="list-style-type: none"> - The use of the official name of the conventions. - The use of the correct publication references and the most recent amendments of the legislation. - The use of the official name and the correct translation of the name of the acts in the document. For example: ‘Government Decree on Mining Installations S.B. 1989 no.38’ should be ‘Besluit Mijnbouw – installaties S.B. 1989 No.38 (State Decision on Mining Installations S.B. 1989 No.38). - The use of the official citation method for Surinamese legislation: (e.g. [Name of Act], [original publication reference], if there is an amendment [z.l.g. bij [publication reference]]. The official publication reference for Surinamese legislation is: S.B. or G.B. [year of publication], [no. of publication]. For example: ‘Grondwet van de Republiek Suriname S.B. 1987 no.116 z.l.g. bij S.B. 1992 no.38 (The Constitution of the Republic of Suriname S.B. 1987 no. 116 as amended by S.B. 1992 no. 38)’ 		



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Apply this notation for all acts in the document.		
1.0 Introduction		
1	This document is provided to the National Institute of Environment and Development (NIMOS)	It should be the National Institute of Environment and Development in Suriname
3	Table 1-1: ESIA Core Team <u>Kitie</u> Algoe	It should be Kirtie.
6	2.1 Project Location and Access The area has also been accessed by mainly foreign logging companies.	Were these logging companies working in the context of the current Sabajo project or were they working privately?
7	2.3 Sabajo Mine Site Project Components The largest pit is expected to be approximately 270 meters below ground surface (<u>m bgs</u>) with a surface area of approximately 55 hectares (ha) of which approximately 36 ha is already disturbed by SSM. Ore will be stockpiled at the ore storage area and transported to Merian via the <u>transportation corridor using 100-150 ton trucks.</u>	What will be the frequency of the transportation on daily basis and how many trucks will be deployed to transport the ore?
7	2.3 Sabajo Mine Site Project Components <u>Based on preliminary geochemical analyses</u> , it is anticipated that the waste rock will be inert and not generate acid drainage.	Were these preliminary geochemical analyses conducted in the Sabajo area?
7	2.4 Sabajo-Merian Haul Road The three routes under consideration are shown in Figure 2-3.	The reference to figure 2-2 and figure 2-3 is switched.
2.0 Project Description		
3.0 Legal and Regulatory Framework and Corporate Standards		
11	3.2 Legal Framework	<ul style="list-style-type: none"> • ‘The Hindrance Act (Hinderwet, 1930, 1944, and 1972)’ should be ‘Hinderwet



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		<p>1930 G.B. 1930 no. 64 z.l.g. bij SB. 2001 no. 63 (Nuisance act G.B. 1930 no. 64 as amended by SB. 2001 no. 63)'</p> <ul style="list-style-type: none"> • 'The Nature Conservation Act (Natuurbeschermingswet, 1954)' should be 'Natuurbeschermingswet 1954, G.B. 1954 no. 26 z.l.g. bij S.B. 1992 no. 80 (Nature Conservation Act 1954, G.B. 1954 no. 26 as amended by S.B. 1992 no. 80)' • 'The Forest Management Act (Wet Bosbeheer 1992)' should be 'Wet Bosbeheer S.B. 1992 no. 80 (The Forest Management Act S.B. 1992 no. 80)' • 'The Timber Act of 1947' should be 'Houtwet 1947 G.B. 1947 no.42 (Timber Act 1947 G.B. 1947 no.42)'
12	NIMOS published the draft Guidelines for Environmental Assessment (2009) (including social aspects) in Suriname and project developers are expected to comply with the spirit of the guidelines.	The Guidelines are not Draft. They are Final.
13-21		<ul style="list-style-type: none"> • Table 3-1: Legal Framework(a) for National Environmental and Social Management in Suriname: <ul style="list-style-type: none"> - All Legislation mentioned in this table should be reviewed and corrected on the following aspects: official name and translation of the name, publication references and the most recent amendments, official citation method and the relevance for the project. - 'Law on Territorial Sea and the Contiguous Economic Zone (1978 S.B. 1978 No. 26)' is mentioned. The official name is: 'Wet van 14 april 1978 houdende uitbreiding van de territoriale zee van de



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		<p>Republiek Suriname en de instelling van de daaraan grenzende economische zone S.B. 1978 no. 26 (Law Containing the Extension of the Territorial Sea of the Republic of Suriname and the Establishment of a Contiguous Economic Zone S.B.1978 no.26), it has been withdrawn by the act 'Wet Maritieme zones S.B. 2017 no. 41 (Maritime zones act S.B. 2017 no. 41). This should be corrected in the document.</p>
22	3.3 Regulatory Framework in Suriname	<ul style="list-style-type: none"> • In alinea 3 the current position of NIMOS is not fully described. Please correct this in the document. • The Ministry of Labor Technological Development and Environment' is mentioned. The name and responsibilities of this Ministry have been revised by State Decree of 2015 (S.B. 2015 no. 41). Please correct this in the document where necessary.
24	3.4 International Standards and Guidelines	<p>Why are the IFC Environmental Performance Standards and EHS Guidelines not included in table 3.4?</p>
<p><u>4.0 Environmental and Social Impact Assessment Purpose and Process</u></p>		
30	<p>4.2.1: In accordance with NIMOS guidelines for screening projects, any nonmetallic mining project that will affect greater than 20 hectares of land is a Category A project for which a comprehensive environmental assessment (ESIA, in this case) is mandatory.</p>	<p>This is a gold mining project which is a metallic mining project. It is considered a Category A project because the future Right of Exploitation Area is expected to be above 10.000 ha</p>
<p><u>5.0 Preliminary list of issues</u></p>		
34	<p>Cumulative impacts from other projects (e.g. effects of the Project combined with logging and Small</p>	<p>Also take into consideration that the planned haul road can have as a negative impact that the small</p>



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	scale mining)	scale gold miners can have easier access to the area
34	Historic Sabajo baseline studies, which includes data collected on surface water and groundwater water quality reports and climate	Who had done this study and in which year is it conducted?
6.0 Stakeholder Engagement and the Objectives of Public Consultation		
7.0 ESIA Scope of Work		
42	7.2.1 Framework for Social Data Collection Layer 3: Demographic (L3) Methods/instruments: Surveys/questionnaires <input type="checkbox"/> broad-based/statistical sampling <input type="checkbox"/> household-level surveys	Will each household in the AOI be surveyed?
44	7.2.1.1 Examples Layer 1: Physical Where in the AOI <u>are</u> SSM activities <u>are</u> taking place?	Typo.
50	7.3.1 Environmental Specialist Study 1: Groundwater Study <u>Groundwater quality samples will be collected quarterly</u> and analyzed by a <u>laboratory</u> for a comprehensive parameter suite including major ions, metals, and nutrients.	How many samples will be taken quarterly? Is this laboratory already identified?
52	7.3.4 Environmental Specialist Study 4: Air Quality and Climate Data will be collected during the long dry season (September and October), which	Why will data be collected only during the long dry season and not the rainy season?



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	should provide a reasonable estimate of worst case conditions.	
53	7.3.6 Environmental Specialist Study 5: Flora Studies A more detailed description of the methodology to be used for the flora studies <u>in</u> included in Appendix C.	Typo. Please correct this. The same is also applicable for section 7.37 and section 7.3.8.1
57	<i>7.4.3.1 Criteria to Evaluate Consequence</i>	Please define the criteria for duration, geographic extent, magnitude and consequence