

ENVIRONMENTAL RISK RELATING TO WATER IN THE SOAMAHAMANINA GOLD-BEARING OPERATION PROJECT

The statement by civil organisations about the Soamahamanina gold mining project questions the delivery by the National Environment Office (NEO) of an environment license to the JIUXING Mines SARL Company (1). Besides the various reactions seen in the media, the NEO General Manager wanted to answer Collective Tany (2). But a number of dark areas still remain, particularly on water issues.

The gold extraction process might use very dangerous chemical products.

Gold mining extraction has destructive effects on environment and human health when it uses dangerous chemical products, in particular mercury in craft mining or cyanide in industrial mining (3). The environment specifications (4) delivered by the NEO emphasises that “no chemical substance will be used for the eventual gold split” (article 85). But the Office must detail, for mass information, substances and process for gold extraction which will be used at various steps of gold extraction.

Rejecting dirty waste water is another major risk for the Ikalariana river. Someone knowing the issue declared that “the mining company has an obligation to install a desludging tank in order to treat waste water before flowing to the river” (5). So we insist to get the description of the whole operation process, with precisions about the materials which could be contained in waste water, as well as details on the desludging before discharge in the Ikalariana river. There should be information also about effects on underground water, ground water, neighbouring rivers and lakes, the ground and the underground. Any toxic dump being stocked or buried is a threat of sound and irreversible environment pollution.

The environmental specifications admit the threats brought by “the mechanized operation of the gold deposit” on water. It mentions that the Ikalariana river, which is in the middle of the project, already presents “a very high content of suspension material due to the local population gold washing activities which are located upstream” (4). About this crucial point, the environment specifications must give details about the nature, the content and the toxicity of the materials already existing before starting operation. Otherwise, how the NEO could seriously assess present or future damages, and protect impacted population.

It is essential and urgent that the NEO presents an exemplary transparency facing such large scale environment risks. Ikalariana river reaches Onibe, then Ikopa and Betsiboka before flowing into the Mozambique Canal. Municipalities in the Itasy, Bongolava, Betsiboka and Boeny regions would also be affected in case of pollution by cyanide or other metals.

Ikalariana and the other rivers are the only water resource for human and animal consumption, and for daily needs and culture watering. All these activities might get serious consequences in case of pollution and in case of scarcity of water resource.

About the consequences of the project operation, on water availability for neighbouring population.

According to the 62 article of the Environment Specifications, “Ikalariana river will be the water resource for treating materials”. A “temporary license of water taking from the Ikalariana river” was delivered by the National Water and Waste Water Authority. But neither the specifications nor the document itself as it appears on a Website (6) indicate the duration of the license which is supposed to be temporary. On the other side, it is indicated that all changes relating to the project water resources should be approved by the Authority and that any pumping of the groundwater should be subject to a sound study and get authorisation by the Authority (article 63). In other words, this “temporary” state could become permanent?

The specifications indicate also that the mining company should not take more than 270 cubic meters per day, among which 260 for treating minerals and 10 for domestic needs of the life base (article 62). But no

information has been disseminated on the river flow at its lowest and on domestic and culture needs of the population downstream.

These points relate to the environment license presently delivered, covering the 7 mining squares of the Andravolobe site, while the mining square includes 57 mining squares (article 3). Which water source will be used later for the remaining 50 mining squares? What will remain for the population use?

A specific answer to all these questions will be required before any further thinking and activities on the 7 squares. There should not be any activity on the remaining 50 squares as long as the population will not know the requested commitment. This should be done through sound information on the project aspects.

Thought and information on environment risk linked to water result in deducting that population impacted by the effects of the JIXING Mines SARL Company project include inhabitants of the Soamahamania, Arivonimamo II and Morafeno municipalities which are concerned by the already delivered licenses. But other municipalities are also included in the Itasy, Bongolava, Betsiboka and Boeny regions which are downstream the Ikalarina river.

The environment impact study carried out by Jiuxing Mines SARL Company was “assessed as favourable by the ad hoc technical committee” (article 6). The committee concludes on “the existence of negative impacts which are manageable” (article 5) (4). But the lack of transparency about this study must be removed, as being informed is a right for all citizens. What are these identified negative impacts, which are said to be manageable?

Learning from other countries experiments

Up to now, gold mining in Madagascar was mostly a small scale activity. In order to have specific examples of possible negative impacts of a mechanized mining, we must refer to experiences in other countries using industrial methods.

In Papua New Guinea (7), gold mining “use modern industrial methods and toxic substances such as cyanide and mercury. These methods contaminate water supplies and contribute to the destruction of ecosystems. They destroy landscapes and produce huge quantities of toxic waste. In order to limit environment damages, some companies build ponds where toxic waste is dumped. But ponds do not necessarily prevent contamination of neighbouring areas environment through infiltration in the ground and in underground water. Among the 3500 mining waste holding tanks which exist in the world, one or two big effusions happen every year. They cause ecological irreversible damage in several countries. China is among the countries mentioned as already having been a victim of these ecological calamities. (7)

Besides, in Dominican Republic (8) “residents in areas directly affected by operating one of the biggest gold mining in the world report that their coffee plants do no longer bring any product since mining operations started. Parents mention rains with such stench that they took children from schools and kept them confined inside houses with closed windows during 24 hours in a row”. The river water was so acid that it burnt some residents’ skin. Residents had racks full of 20 litres water cans. They explained that the only possible solution for the “company” was to provide residents with 4 water cans several times a week. “This treated water was the only clean water which could be used in all circumstances, either be for consumption, body cleaning, home use or animals watering”. (8)

We ask the National Environment Office to urgently release the environment impact study made by the JUIXING Mines Company, which they assessed favourably. It is an essential transparency duty on environment and socio economic issues which are so fraught with consequences.

If this study presents problems, particularly if the risks linked to the project are of importance, the environment license must be cancelled.

Conclusion

The National Environment Office General Manager mentioned in the letter to the Collective Tany that “ It does not fall in the Office remit to stop a project when technical conditions are met and when local authorities and population accept the project”(9). This point of view, which is probably shared by other responsible persons and decision makers in Madagascar, is surprising as it seriously devalues and neglects environment aspects. Moreover, this agreement on the project, that the Office wants to respect, is obtained in conditions where all crucial information such as environment impacts is not disseminated to local authorities and population.

Civil society organisations already mentioned other questionable aspects of the consultation process and the lack of consideration for the majority view refusing the Soamahamanina project (10 and 1). We insist therefore on the importance and urgency of getting the Office answers to all various questions linked to water.

Please allow us to end with this quotation:

“The stakes about environment risks concern population, natural environment, goods and equipment, as they are all exposed to hazard. They are not reduced to the directly affected territory. Further territories could be affected, because of interdependence with the affected territory, notably on economic or energy aspects” (11).

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- (6) <http://www.madagate.org/madagascar-informations-politiques/a-la-une/5812-madagascar-tragedie-sociale-a-soamahamanina-ale-rte-pour-le-vatican.html>
- (7) Papua New Guinea : <http://www.brilliantearth.com/gold-mining-environment/>
- (8) Dominican Republic : <http://www.ritimo.org/L-eau-a-plus-de-valeur-que-l-or>
- (9) « Tsy anjaran'ny ONE velively no manajanona tetik'asa iray rehefa feno ny fepetra ara-teknika ary rehefa nifanaraka ny tompon'andraikitra eny an-toerana sy ny vahoaka » (Traduction par ONE : Ce n'est pas dans les attributions de l'ONE de faire arrêter le projet quand les conditions techniques sont remplies et que les autorités locales et la population locale affectée acceptent le projet » dans Lettre du DG de l'ONE au Collectif TANY (ref 2)
https://drive.google.com/file/d/0Bzd_HeLNs87pTzBXYjluTjRMbzA/view
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