

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	7
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Rosia Montana, 24.07.2006
RMGC internal unique code	MMGA_0061
Proposal	<p>The questioner believes that if the project is stopped, the following disadvantages will be generated:- the environment will remain polluted following the mining operations performed so far, without any money invested by somebody to rehabilitate it;</p> <ul style="list-style-type: none"> - the unemployment rate will be among the most elevated ones - the area will be depopulated - this will be another evidence of the fact that governmental leaders do not care about the fate of Rosia Montana locals who have always lived from mining.
Solution	<p>While we are confident that the Government of Romania is deeply concerned about the interests of all regions of the country, the questioner's comments about the impact should the project be stopped are certainly supported by the conclusions of the EIA Report (<i>Assessment of the Alternatives</i>). The report examined alternative options for the Roșia Montană Project including the “no-project” option, and concluded that the environmental impact of the no-project option would be that the current pollution problems will remain and employment opportunity will be foregone.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	86
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Campeni, 26.07.2006
RMGC internal unique code	MMGA_0213
Proposal	<p>In chapter V, the one on alternatives it is mentioned that no alternative development to mining is possible at Rosia Montana at the moment. On 3 pages, value judgments are stated, like the one on the 0 Alternative, no project alternative respectively, which is stated that it is not possible.</p> <p>He wants to receive a list of all studies and of all independent certified or not experts who have been consulted to reach to these conclusions.</p>
Solution	<p>The judgments contained in the EIA are based on in-depth examination, and assessment of the economic, cultural and social factors prevalent in the region. Rather than suggest there is no alternative to mining, Chapter 5 (<i>Assessment of Alternatives</i>) examines potential for developing other industries that could possibly support the sustained economic growth of the region (See Section 1.2 of Chapter 5). These include agriculture and grazing, tourism, forest-related industries, cottage industries and exploitation of flora for pharmaceutical purposes.</p> <p>It is concluded that none of these industries has the potential to support economic growth to the degree forecast for the RMP. The rough terrain with low fertility soils restricts the land use to low productivity practices, such as grazing and mowing. The arable area is small and fragmented, being near local villages. Due to low edaphic volume, modern farm machinery cannot be used. Primary natural habitats are almost completely absent. Mining and associated activities have led in time to changes in the land use due to the construction of houses, development of agricultural land, and extension of logging areas. High intensity of use, coupled with drier and hotter micro-climate on these slopes, has resulted in impoverished and low-productivity meadows. These conclusions are supported by qualified experts in soil, biodiversity, water and landscape. Their names are listed in the report.</p> <p>The report also notes that operation of the RMP does not preclude the development of these other industries and indeed, RMP's beneficial impacts remove serious impediments to their establishment – such as the inward investment to improve infrastructure, the creation of demand for goods and services and the remediation of land dereliction and pollution.</p> <p>Alternatives assessed also include the alternative of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue.</p> <p>The baseline data used in regard to alternative industries are taken from <i>Social & Human Problems in the Mining Zone Roșia Montană</i>. The Certified Authors of the EIA study are set out in Chapter 1 of the EIA Report (<i>General Information</i>).</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	100
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Campeni, 26.07.2006
RMGC internal unique code	MMGA_0229
Proposal	If the project is stopped, the questioner would like to know if the state has an alternative.
Solution	<p>While we cannot speak for the Romanian State – or anticipate how it might act to try to foster alternative development strategies should it decline to permit the RMP however as per the Government of Romania has completed a strategy for such mining areas and the privatization of resource projects and the attraction of investors into the resource development sector is one of the key components of this. The UNDP on recent projects has supported this initiative. However, the EIA report does consider the prospect that the project should not proceed (see Chapter 5, <i>Assessment of the Alternatives</i>, Section 1.1). In this eventuality, the EIA states, the existing negative socio-economic and environmental impacts would persist (such as high unemployment and significant water pollution). The EIA also predicts that alternative industries (such as agriculture/grazing, tourism and forestry) would find it difficult to attract the level of investment necessary to resolve these existing historical environmental and social issues and sustain development in the area.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	130
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Alba Iulia, 31.07.2006
RMGC internal unique code	MMGA_0300
Proposal	<p>within the assessed alternatives (pg. 115, natural potential usage), there is a list of potential usages of available natural resources, which is said to be just speculative, even if certified experts had to assess this potential in an appropriate manner. The questioner wants to know whether this natural potential has been assessed or not.</p> <p>The EIA considered alternative developments – including agriculture, grazing, and flora/fauna gathering for pharmaceutical purposes, forestry and forest products – as well as meat processing, and tourism, and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the RMP.</p>
Solution	<p>However, it is also noted that the RMP would not halt development of alternative industries in parallel – and would indeed remove some of the current obstacles for development, such as pollution and land dereliction.</p> <p>Alternatives assessed also included the alternative of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue and inhibit sustainable development in the area.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	133
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Alba Iulia, 31.07.2006
RMGC internal unique code	MMGA_0310
Proposal	<p>The Company claims that there are 13 alternatives for the TMF, but they are not presented in the Impact Assessment study. Does this mean that the data presented in EIA are false or incomplete? Does it mean that RMGC has the mining license which allows it to expand all over the Southern area of the Apuseni Mountains and find a suitable site?</p> <p>Chapter 5. Section 3.3 of the EIA report (<i>Assessment of the Alternatives</i>) explains this process – and presents a summary to indicate the main choices including the 13 main alternatives.</p>
Solution	<p>RMGC has been considering options for locating the Tailings Management Facility since at least 1999, and several studies have been carried out to assist the final selection of a preferred site. In 2001, nine site options were identified; in 2002 a new study considered these options <i>in addition to</i> some new alternatives to finally recommend eight options to consider.</p> <p>One of the main reasons for selecting the Corna Valley location for the TMF is that it minimizes the overall project footprint because it is located adjacent to the proposed mine and process plant sites and in part covers historically impacted and degraded land.</p> <p>The area affected by RMGC's proposals is clearly described and shown in the EIA report.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	157
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Zlatna, 02.08.2006
RMGC internal unique code	MMGA_0337
Proposal	<p>Regarding the alternatives proposed by the opponents of the project, the questioner makes the following comments:- promoting tourism and agriculture: generally speaking it is well known that mining sites are not tourist attractions, and competitive agriculture cannot be developed. At Rosia Montana, due to soil and climatic conditions cannot be developed but, eventually, as a subsistence agriculture.</p> <p>- wood processing would be another proposal – the questioner agrees with this proposal, because it is one of the locals' (motilor) traditional practices. But what wood? As a great nature lover the questioner emphasises the fact that he had seen no woods while wandering around Rosia Montan hills.</p>
Solution	<p>Information provided in the EIA report supports the general point made by the questioner that industries other than mining are poorly developed in Roşia Montană. However, the EIA report also highlights and makes an assessment such that development of the RMP does not preclude development of other industries in the area. Indeed, the RMP would remove some of the obstacles that currently discourage inward investment, such as the presence of derelict and polluted land, polluted streams, infrastructure and poor socio-economic conditions generally. Properly managed and funded conservation work in the Roşia Montană Protected Area as proposed in the RMP would foster the area's ability to attract tourists.</p> <p>Chapter 5 of the EIA Report states that tourism will be possible and profitable only when there is something to offer tourists in terms of clean environment, proper infrastructure, and attractions such as museums and accessible historical monuments. A mining project such as that proposed by RMGC will provide, through taxes, the necessary funds to improve the infrastructure. Through the RMP and its heritage management plans, US\$25 million will be invested by the company in the protection of cultural heritage in a way that will support tourism. A training program will provide the necessary skills to develop tourism activities, and the Rosia Montană Micro Credit will support people in opening restaurants and other businesses that attract tourists.</p> <p>At the end of the project, there will be a new village, plus the restored old center of Roşia Montană with a museum, accommodation, restaurants, modernized infrastructure, and preserved monuments such as Tăul Găuri – all of which would serve as tourist attractions.</p> <p>RMGC has commissioned a tourism documentation which sets out how potential tourism markets and how these might best be approached in an integrated project (<i>Initial Tourism Proposals</i>, Gifford Report 13658. R01)</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	165
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Zlatna, 02.08.2006
RMGC internal unique code	MMGA_0349
Proposal	Within EIA report there is no alternative study to mining industry, namely tourism, agriculture etc...., insisting on the fact that Rosia Montana Gold Corporation project is the only alternative.
Solution	Other alternatives to the RMGC proposal are possible, and have been fully considered, but are not economically attractive nor considered viable under the current socio-economic conditions. Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) examines potential for developing other industries that could possibly offer the ability to support the sustained economic growth of the region (See Section 1.2 of Chapter 5). These include agriculture and grazing, tourism, forest-related industries, cottage industries and exploitation of flora for pharmaceutical purposes. It is concluded that these activities has the potential to support economic growth to the degree forecast for the RMP nor to sustain development of the area. It is also noted that operation of the RMP does not preclude the development of these other industries and indeed, RMP's beneficial impacts remove serious impediments to their establishment. For example, the inward investment to improve infrastructure, the creation of demand for goods and services and the remediation of derelict land and pollution.

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	247
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Cluj Napoca, 07.08.2006
RMGC internal unique code	MMGA_0500
Proposal	<p>The 5th chapter (analysis of alternatives) mentions that there is no other alternative in the area if the project is not developed (pg. 8 of 117), and the community sustainable development plan (pg. 5, paragraph 6) says exactly the opposite, that RMGC has the solution and not through mining development.</p> <p>The Report on the environmental impact assessment study (EIA) does not rule out alternative developments for the area, but it does conclude that mining offers the most viable form of development – and a potential foundation for further development, including other alternatives.</p>
Solution	<p>Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) examines potential for developing other industries to support the sustained economic growth of the region (See Section 1.2 of Chapter 5). Among the alternative developments the EIA examined were: agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes. The conclusion: these activities don't have the potential to support economic growth to the degree forecast for the Roșia Montană Project (RMP).</p> <p>The report concludes that "a diverse multi-sector economic base is important for the sustained economic growth of the region", and the RMP is capable of providing the required economic stimuli and would serve to help achieve the economic goal of sustainable prosperity. Other industries do not have this capability but their development in parallel is not precluded "and to the contrary, [the RMP] solves several key problems that discourage inward investment."</p> <p>The Community Sustainable Development Management Plan is not an alternative to the RMP; rather, it is intended to ensure the long-term prosperity and health of the communities affected by the RMP in the event that the Project is constructed, operated and finally closed down.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	253
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Cluj Napoca, 07.08.2006
RMGC internal unique code	MMGA_0518
Proposal	<p>If a pit cannot be established there, what will happen to the people? Will RMGC bring them back or they will come on their own?</p> <p>If the region should lose a project that would lead to the creation of 600 direct jobs, 6,000 indirect jobs and the infusion of \$2.5 billion USD in benefits to the country, would people want to return – and would people who still live there be able to continue to make a live for themselves there?</p> <p>It is important to keep in mind that the Report on the Environmental impact assessment study (EIA) considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes. The conclusion? these activities could not provide the economic, cultural and environmental benefits brought by the Roșia Montană Project (RMP).</p>
Solution	<p>On the other hand, Chapter 5 of the EIA Report states that tourism will be possible and profitable only when there is something to offer tourists in terms of clean environment, proper infrastructure, and attractions such as museums and historical monuments. A mining project such as that proposed by RMGC will provide, through taxes, the necessary funds to improve the infrastructure. Through the RMP and its heritage management plans, the company will invest US\$25 million in the protection of cultural heritage in a way that will support tourism. A training program will provide the necessary skills to develop tourism activities, and the Roșia Montană Micro Credit will support people in opening restaurants and other businesses that attract tourists.</p> <p>At the end of the project, there will be a new village, plus the restored old center of Roșia Montană with a museum, accommodation, restaurants, modernized infrastructure, and preserved monuments such as Tăul Găuri – all of which would serve as tourist attractions.</p> <p>Those who have or will avail themselves of the relocation or resettlement are starting a new life. Permitting the RMP to move forward will give the people remaining in the region a chance to do the same.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	286
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Turda, 09.08.2006
RMGC internal unique code	MMGA_0616
Proposal	<p>Does the solution proposed by RMGC represent the only possibility for the development of the Apuseni Mountains area?</p> <p>Operation of the Roșia Montană Project (RMP) most definitely does not preclude the development of other industries. Indeed, RMP's benefits remove serious impediments to their establishment, through such means as infrastructure investment, enhanced demand for goods and services, and the remediation of land dereliction and pollution.</p>
Solution	<p>So the RMP does not represent the only opportunity for the Apuseni Mountains, so much as one of the most important developments for the Apuseni Mountains. Indeed, we would not just invest in responsible mining, but also such investments as \$25 million in cultural heritage.</p> <p>The mining development proposal is key to economic and cultural progress for the area, Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) examines potential for developing other industries that could possibly offer the ability to support the sustained economic growth of the region (See Section 1.2 of Chapter 5). These include agriculture and grazing, tourism, forest-related industries, cottage industries and exploitation of flora for pharmaceutical purposes. The report concluded that these activities don't have the potential to support economic growth to the degree forecast for the RMP.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	355
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Bucuresti, 21.08.2006
RMGC internal unique code	MMGA_0730
Proposal	<p>The questioner makes the following observations and comments: 10 000 young people will be this year in Rošia Montana to prove that tourism is a viable solution for this area and that the young people represent this country's gold.</p>
Solution	<p>The Rošia Montană Project (RMP) offers potential for encouraging tourism, and mitigation and management plans seek to foster this. Unquestionably, young people represent the future of Rošia Montană, and tourism may be one of the industries that can attract and retain them. But Rošia Montană currently has little tourism activity. As well as enabling rehabilitation of derelict mined land and halting stream pollution, the RMP will enable appropriate conservation of the historic Rošia Montană and provide for access to tourists and visitors. RMGC recognizes that the long-term prosperity of the affected communities must be provided for by channeling the inward investment from the RMP into growth of other industries, such as tourism. The <i>Community Sustainable Development Management Plan</i> recognizes that young people in the community will have a long-term future – dependent upon mining.</p> <p>The Report on the Environmental impact assessment study (EIA) examines potential for developing other industries – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the RMP.</p> <p>Attached to the Report is a study covering Initial proposals to develop tourism at Rošia Montană.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	369
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Bucuresti, 21.08.2006
RMGC internal unique code	MMGA_0749
Proposal	<p>The company stated that the tailings management facility would be built in the Corna Valley, but there are people there who would not leave. Then the company stated that they had a B plan, that they had 10 variants, that is 10 valleys where the tailings management facility can be built. However, this would require a second project, and all this "circus" taking the form of public consultations will start all over again.</p> <p>Corna Valley is the preferred location, based on thorough analysis of several alternative sites, assessed on the basis of their impact on people and the environment, and on costs. Chapter 5 of the Report on the Environmental impact assessment study (EIA) (<i>Assessment of Alternatives</i>) describes the work carried out by RMGC to identify a preferred option. Many options and sub-options have been studied.</p> <p>It is important to keep in mind the degree of acceptance that the project seems to have from residents in the area required for completion of the project. Of the properties required to construct the project and begin mining operations, 98% have been presented for surveying by their owners – a step that implies a distinct interest in selling the property to the company. The survey rate suggests that little more than a handful of properties are held by people who might prove unwilling to entertain a sale.</p> <p>Of that small number, some will lie in areas not needed for construction and early operation of the mine.</p>
Solution	<p>Of the even smaller number of homes that are located in areas in which the construction and early operation of the mine will take place, the company will seek options to redesign the mine plan to allow those owners to retain their property, unaffected by the mine.</p> <p>Of course it may prove, at the end of all of these efforts, that a very small number of property owners – perhaps a few families – will refuse to sell their holdings. At that point, the decision falls to Romanian Government authorities as to whether they will exercise the legal instruments available to them to expropriate the properties. That decision will turn on whether a small number of people, perhaps a handful, should prevail (via a de facto veto power) over the majority will of local residents and Romania's national interests as a whole to benefit from the creation of 600 direct jobs, 6,000 indirect jobs and the infusion of \$2.5 billion USD in benefits to Romania, including a significant amount in a rural region that has been designated a "Disadvantaged Zone" and knows only extreme poverty at present.</p> <p>Of course, in the event the project cannot be completed in Corna Valley, RMGC would consider other sites. Any such proposal would require public consultation, in accordance with the provisions of the Aarhus Convention on access to environmental information and of Romanian laws, namely Ministerial order no. 860/2002, Article 37, letter c.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	389
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Bucuresti, 21.08.2006
RMGC internal unique code	MMGA_0810
Proposal	<p>Concerning the assessment of alternatives, the questioner believes that the analysis of an interesting alternative has been purposely avoided – an alternative that may cast a new light upon this project – namely gravitational recovery. This procedure was only mentioned, without being analyzed, as required by the procedures. The questions are:</p> <p>How much, how, which are the costs, which are the investments? Can it be recovered? If, almost 10 years ago, when an ounce of gold cost USD 275, this alternative did not appear to be feasible, now, when an ounce of gold costs over USD 600, a quantity of 80, 90, 100 tons of gold recovered using this method would eliminate many of the contradictions related to this project.</p> <p>Gravitational recovery would be an excellent option in a new vein where the gold is still easily extracted. Unfortunately, it is not a realistic alternative for Roșia Montană, as discussed in Chapter 5 of the Report on the Environmental impact assessment study (EIA), which describes the test work that was carried out to optimize design of the process plant.</p>
Solution	<p>Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) explains how ore extraction technology is matched to the ore being mined. For gold ores where the gold particles are physically free within the rock, they can be recovered by physical means, including gravitational recovery. At the other extreme, gold particles can be wholly contained within other minerals and must be extracted and recovered by chemical means (i.e. through leaching). At Roșia Montană, the old miners worked gold in veins that contained a high proportion of coarse and free gold that could be extracted relatively easily through gravity. This vein and coarse gold is now largely worked out, and the remaining ore is partially free and partially encapsulated in other minerals as well as being much finer in size. As a result, to avoid significant loss of gold in the recovery, cyanide leaching is proposed to be used to assist the liberation of gold particles and ensure maximum recovery is obtained to best utilize and recover the gold resource.</p> <p>A number of recovery options were considered at the scoping level study stage, the pre-feasibility study stage and in the feasibility, plus optimization and basic engineering level studies considered a number of gold recovery options including a variation of these to most efficiently recover the gold resource. These are also covered in the alternatives section of the EIA.</p> <p>It is true that since the late 1990s the gold price has risen from around US\$275/oz to US\$500/oz. (using a 3-year running average of the price of gold as legally required for economic analysis). But the initial capital costs of the project have more than tripled, from US\$192 million to US\$638 million, and the operating costs have more than tripled from US\$119 million to US\$378 million, negating any hoped-for benefit from the rise in the price of gold. A high level of recovery is still required in order for the project to be feasible.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	391
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Bucuresti, 21.08.2006
RMGC internal unique code	MMGA_0824
Proposal	<p>The company claims to have 10 variants for the project, in case the locals refuse to leave Rosia Montana and Corna; this is a big lie because there are actually only two variants:</p> <ul style="list-style-type: none"> - the mining project is developed in Rosia Montana, or - RMGC leaves Rosia Montana. <p>Other alternatives to the RMGC proposal are possible, but are not economically attractive or sustainable. Chapter 5 of the Report on the Environmental impact assessment study (EIA) (<i>Assessment of Alternatives</i>) examines potential for developing other industries to sustain economic growth of the region. But it concludes that none of these industries has the potential to support economic growth to the degree forecast for the RMP.</p>
Solution	<p>Chapter 5 also sets out all the alternatives for the project regarding location, technology and timing, including the “no-project” option. The location of the ore deposit is fixed by geology, but the company examined alternative locations for key facilities and infrastructure, such as waste rock dumps, TMF, process plant and access roads. The EIA report discusses options for location of these features and assesses their impact in relation to the selected option for each.</p> <p>RMGC has been considering options for locating the TMF since at least 2000, and several studies have been carried out to assist the final selection of a preferred site. In 2001, nine site options were identified, and in 2002 a new study considered these options in addition to some new alternatives, to finally recommend eight options to reconsider. Chapter 5 of the EIA Report explains this process, and presents a summary to indicate the main choices. One of the main reasons for selecting the Corna Valley location for the TMF is that it minimizes the overall project footprint as it is located adjacent to the proposed mine and process plant sites.</p> <p>However, it is apparent that there remains flexibility in adjusting the “footprint” of the project where insurmountable obstacles may arise, e.g. where land ownership cannot be altered.</p>

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MMDD's item no. for the question which includes the observation identified by the RMGC internal code	467
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	Arad, 25.08.2006
RMGC internal unique code	MMGA_1000
Proposal	The questioner also wants to find out about the alternatives to the project.
	<p>The Report on the Environmental impact assessment study (EIA) considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Roşia Montană Project (RMP).</p> <p>Alternatives assessed also included the alternative of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue.</p>
Solution	<p>The examination of alternatives also evaluated the best mining technology, duration and staging of the project, mining and processing technologies, environmental management practices, site options for waste management facilities, transportation routes, and measures to prevent and minimize environmental and social impacts during construction, operation, and the closure and post-closure periods. Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) sets out all of the information concerning the project alternatives, and is also summarized in the Non-Technical Summary.</p> <p>However, it is also noted that the RMP would not halt development of alternative industries in parallel and would indeed remove some of the current obstacles for development, such as pollution and land dereliction.</p>

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MMDD's identification no. for the question which includes the observation identified by the RMGC internal code

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114373/169078/10.10.2006, No. 114903/05.10.2006

RMGC internal unique code MMGA_1050

Proposal The EIA report does not assess the "zero alternative"; SEE CONTENT CONTESTATION TYPE 1

The Report on the Environmental impact assessment study (EIA) considered all alternative developments, including the option of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue (Chapter 5 – *Assessment of Alternatives*).

Solution The report also considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Roşia Montană Project (RMP).

Chapter 5 also examines alternative locations for key facilities as well as alternative technologies for mining, processing and waste management, in line with best practice and as compared against published EU best available techniques (BAT) documentation.

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	153, 154, 155, 156, 157, 262, 263, 266, 267, 302, 303, 326, 327, 328, 336, 337, 341, 342, 343, 344, 345, 346, 347, 348, 349, 351, 352, 356, 358, 359, 378, 379, 386, 387, 388, 389, 395, 396, 397, 398, 399, 400, 401, 402, 403, 424, 425, 426, 427, 428, 429, 432, 434, 435, 457, 458, 459, 461, 463, 464, 465, 466, 467, 468, 469, 470, 473, 474, 477, 544, 870, 871, 872, 880, 923, 1440, 1441, 1442, 1443, 1456, 1484, 1504, 1505, 1509, 1515, 1516, 1517, 1518, 1519, 1520, 1527, 1530, 1539, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1556, 1558, 1560, 1598, 1599, 1600, 1601, 1602, 1604, 1605, 1615, 1616, 1617, 1618, 1619, 1620, 1621, 1688, 1694, 1695, 1701, 1778, 1779, 1788, 1789, 1790, 1794, 1798, 1799, 1821, 1822, 1823, 1824, 1825, 1826, 1827, 1828, 1829, 1838, 1839, 1864, 1888, 1896, 1902, 1919, 1921, 1926, 1927, 2269, 2602, 2614, 2615, 2616, 2617, 2867, 2868, 2989, 2990, 2991, 2992, 2993, 3015, 3016, 3019, 3022, 3025, 3026, 3028, 3034, 3064, 3066, 3067, 3068, 3069, 3070, 3071, 3072, 3075, 3075BIS, 3076, 3130, 3131, 3132, 3133, 3136, 3197, 3198, 3199, 3200, 3231, 3243, 3610, 3611, 3612, 3613, 3614, 1/D;5456/B, 10/D;5465/B, 11/D;5466/B, 12/D;5467/B, 13/D;5468/B, 14/D;5469/B, 15/D;5470/B, 16/D;5471/B, 17/D;5472/B, 18/D;5473/B, 19/D;5474/B, 20/D;5475/B, 21/D;5476/B, 22/D;5477/B, 23/D;5478/B, 24/D;5479/B, 25/D;5480/B, 26/D;5481/B, 27/D;5482/B, 28/D;5483/B, 29/D;5484/B, 5485, 5599, 5600, 5601, 5602, 5603, 5604, 5605, 5606, 5607, 5608, 5609, 5610 No. 108787/02.08.2006 and No. 74340/02.08.2006, No. 108788/02.08.2006 and No. 74341/02.08.2006, No. 108789/02.08.2006 and No. 74342/02.08.2006, No. 108790/02.08.2006 and No. 74343/02.08.2006, No. 108791/02.08.2006 and No. 74344/02.08.2006, No. 109011/07.08.2006 and No. 74479/08.08.2006, No. 109013/07.08.2006 and No. 74480/08.08.2006, No. 109009/07.08.2006 and No. 74483/08.08.2006, No. 109010/07.08.2006 and No. 74484/08.08.2006, No. 109049/07.08.2006 and No. 74519/08.08.2006, No. 109050/07.08.2006 and No. 74520/08.08.2006, No. 109115/09.08.2006 and No. 109117/09.08.2006 and No. 74541/09.08.2006, No. 109114/09.08.2006 and No. 74542/09.08.2006, No. 109117/09.08.2006 and No. 74543/09.08.2006, No. 109106/09.08.2006 and No. 74551/09.08.2006, No. 109104/09.08.2006 and No. 74552/09.08.2006, No. 109120/11.08.2006 and No. 74573/11.08.2006, No. 109121/11.08.2006 and No. 74574/11.08.2006, No. 109122/09.08.2006 and No. 74575/11.08.2006, No. 109123/11.08.2006 and No. 74576/11.08.2006, No. 109124/11.08.2006 and No. 74577/11.08.2006, No. 109125/11.08.2006 and No. 74578/11.08.2006, No. 109142/11.08.2006 and No. 74579/11.08.2006, No. 109143/11.08.2006 and No. 74580/11.08.2006, No. 109144/11.08.2006 and No. 74581/11.08.2006, No. 109146/11.08.2006 and No. 74583/11.08.2006, No. 109147/11.08.2006 and No. 74584/11.08.2006, No. 109152/11.08.2006 and No. 74588/11.08.2006, No. 109173/11.08.2006 and No. 74590/11.08.2006, No. 109174/11.08.2006 and No. 74591/11.08.2006, No. 109215/14.08.2006 and No. 74617/14.08.2006, No. 109215/14.08.2006 and No. 74618/14.08.2006, No. 109223/14.08.2006 and No. 74626/15.08.2006, No. 109224/14.08.2006 and No. 74627/15.08.2006, No. 109225/14.08.2006 and No. 74628/15.08.2006, No. 109226/14.08.2006 and No. 74629/15.08.2006, No. 109232/14.08.2006 and No. 74635/15.08.2006, No. 109233/14.08.2006 and No. 74636/15.08.2006, No. 109234/14.08.2006 and No. 74642/15.08.2006, No. 109235/14.08.2006 and No. 74643/15.08.2006, No. 109236/14.08.2006 and No. 74644/15.08.2006, No. 109237/14.08.2006 and No. 74645/15.08.2006, No. 109238/14.08.2006 and No. 74646/15.08.2006, No. 109239/14.08.2006 and No. 74647/15.08.2006, No. 109240/14.08.2006 and No. 74648/15.08.2006, No. 109261/14.08.2006 and No. 74669/15.08.2006, No. 109262/14.08.2006 and No. 74670/15.08.2006, No. 109263/14.08.2006 and No. 74671/15.08.2006, No. 109264/14.08.2006 and No. 74672/15.08.2006, No. 109265/14.08.2006 and No. 74673/15.08.2006, No. 109266/14.08.2006 and No. 74674/15.08.2006, No. 109269/14.08.2006 and No. 74677/15.08.2006, No. 109271/14.08.2006 and No. 74679/15.08.2006, No. 109276/15.08.2006 and No. 74680/16.08.2006, No. 10931515.08.2006 and No. 74703/16.08.2006, No. 109316/15.08.2006 and No. 74704/16.08.2006, No. 109318/15.08.2006 and No. 74705/16.08.2006, No. 109320/15.08.2006 and No. 74707/16.08.2006, No. 109322/15.08.2006 and No. 74709/16.08.2006, No. 109323/15.08.2006 and No.
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112929/25.08.2006, No. 112988/25.08.2006, No. 112954/25.08.2006, No.
112953/25.08.2006, No. 112877/25.08.2006, No. 109583/18.08.2006, No.
112960/25.08.2006, No. 112959/25.08.2006, No. 112943/25.08.2006, No.
112945/25.08.2006

RMGC internal unique code MMGA_1072

Proposal The EIA report does not assess the "zero alternative";SEE CONTENT CONTESTATION TYPE 3

The EIA Report considered all alternative developments, including the option of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue. (Chapter 5 – Assessment of Alternatives)

Solution The report also considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Roșia Montană Project.

Chapter 5 also examines alternative locations for key facilities as well as alternative technologies for mining, processing and waste management, in line with best practice and as compared against published EU best available techniques (BAT) documentation.

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	308
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 74537/09.08.2006
RMGC internal unique code	MMGA_1118
Proposal	The report does not assess "the zero alternative", that is an assessment in the absence of the project.
Solution	<p>The Report on the environmental impact assessment study (EIA) considered all alternative developments, including the option of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue (Chapter 5 – <i>Assessment of Alternatives</i>).</p> <p>The chapter presents an assessment of all the alternatives that are appropriate to consider for the EIA and in line with the EIA Terms of Reference. The chapter also examined alternative locations for key facilities as well as alternative technologies for mining, processing and waste management, in line with best practice and as compared against published EU best available techniques (BAT) documentation.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	1262
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 110435/22.08.2006
RMGC internal unique code	MMGA_1151
Proposal	The zero alternative is only partially presented;
	Chapter 5 of the Report on the Environmental impact assessment study (EIA) (<i>Assessment of Alternatives</i>) presents a thorough assessment of the “no-project” alternative – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue.
Solution	The immediate impact of not advancing the project is covered, and potential alternative industries are examined – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes. The conclusions are drawn that “a diverse multi-sector economic base is important for the sustained economic growth of the region” and the Roșia Montană Project (RMP) is capable of providing the required economic stimuli and would serve to achieve the economic goal of sustainable prosperity. Other industries do not have this capability but their development in parallel is not precluded. To the contrary, the report states, “[the RMP] solves several key problems that discourage inward investment.”

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	1356, 1357
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 110300/24.08.2006, No. 110302/24.08.2006
RMGC internal unique code	MMGA_1172
Proposal	<p>The EIA report is sizeable but the content is poor in information such as alternative economic opportunities;</p> <p>The Report on the environmental impact assessment study (EIA) considered the immediate impact of not advancing the project and looks beyond this at potential alternative industries. It assessed a wide range of alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Roşia Montană Project (RMP).</p>
Solution	<p>The EIA came to the judgment that other industries do not have the capability of providing the means to ensure sustained economic growth. However, their development in parallel is not precluded “and to the contrary, [the RMP] solves several key problems that discourage inward investment”. It is considered therefore that the assessment of alternative economic opportunity has been undertaken as fully as is appropriate for an EIA of this nature.</p> <p>Alternatives assessed also include the alternative of not proceeding with any project – Chapter 5 presents an assessment of the “no-project” alternative, an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue.</p> <p>The examination of alternatives also evaluated the best mining technology, duration and staging of the project, mining and processing technologies, environmental management practices, site options for waste management facilities, transportation routes, and measures to prevent and minimize environmental and social impacts during construction, operation, and the closure and post-closure periods.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	1356, 1357
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 110300/24.08.2006, No. 110302/24.08.2006
RMGC internal unique code	MMGA_1175
Proposal	<p>the report does not mention any alternatives</p> <p>The Report on the environmental impact assessment study (EIA) considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Roşia Montană Project (RMP).</p> <p>Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) presents an assessment of all the alternatives that are appropriate to consider for the EIA and in any case in line with the EIA Terms of Reference as issued by MEWM. This includes the “no-project” alternative – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue. The Chapter also examines alternative locations for key facilities as well as alternative technologies for mining, processing and waste management, in line with best practice and as compared against published EU best available techniques (BAT) documentation.</p> <p>The examination of alternatives also evaluated duration and staging of the project, environmental management practices, transportation routes, and measures to prevent and minimize environmental and social impacts during construction, operation, and the closure and post-closure periods. Chapter 5 of the EIA report (<i>Assessment of Alternatives</i>) sets out all of the information concerning the project alternatives, and is also summarized in the non-Technical Summary. The RMP would not halt development of alternative industries in parallel and would indeed remove some of the current obstacles for development, such as pollution and land dereliction.</p>
Solution	

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	1356, 1357
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 110300/24.08.2006, No. 110302/24.08.2006
RMGC internal unique code	MMGA_1185
Proposal	Is the Project the best alternative?
	<p>In regards to the economic growth of the region, the Report on the environment impact assessment study (EIA) clearly concludes that the Roșia Montană Project (RMP) provides the best necessary economic stimuli. Other industries were considered – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – but concluded that these activities don't have the same capability to provide the economic, cultural and environmental benefits brought by the RMP. In all cases none provide the ability to sustain development or the current community. The EIA also stressed that the RMP does not preclude their development in parallel. Furthermore, the RMP would make it easier to develop other industries, including tourism.</p>
Solution	<p>The EIA also considered the immediate impact of not advancing the project and looked beyond this at potential alternative industries. Chapter 5 presents an assessment of the “no-project” alternative, an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue.</p> <p>The examination of alternatives also evaluated the best mining technology, duration and staging of the project, mining and processing technologies, environmental management practices, site options for waste management facilities, transportation routes, and measures to prevent and minimize environmental and social impacts during construction, operation, and the closure and post-closure periods.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	1496
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 110627/25.08.2006
RMGC internal unique code	MMGA_1205
Proposal	Missing "zero alternative".
Solution	<p>The EIA Report considered all alternative developments, including the option of not proceeding with any project – an option that would generate no investment, allowing the existing pollution problems and socio-economic decline to continue. (Chapter 5 – Assessment of Alternatives)</p> <p>The report also considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Rosia Montana Project.</p> <p>Chapter 5 also examines alternative locations for key facilities as well as alternative technologies for mining, processing and waste management, in line with best practice and as compared against published EU best available techniques (BAT) documentation.</p>

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	14, 15, 16, 17, 21, 24, 25, 26, 27, 28, 29, 30, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 62, 63, 64, 65, 67, 68, 69, 70, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 151, 152, 158, 159, 161, 162, 163, 164, 165, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 210, 211, 212, 213, 215, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 232, 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MMDD's identification no. for the question which includes the observation identified by the RMGC internal code

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111615/25.08.2006, No. 111616/25.08.2006, No. 111784/25.08.2006

RMGC internal unique code MMGA_1296

Proposal	<p>The EIA report does not evaluate the "Zero alternative"; SEE THE CONTENT OF THE TYPE 1 CONTESTATION</p> <p>Also, the questioner sends within the letter two points of view of some independent specialists</p> <p>Chapter 5 of the Report on the environment impact assessment study (EIA) (<i>Assessment of Alternatives</i>) presents an assessment of the “no-project” alternative in Section 1 (<i>No-Project Alternatives</i>). This section covers the immediate impact of not advancing the project and looks beyond this at potential alternative industries. The conclusions are clear: “A diverse multi-sector economic base is important for the sustained economic growth of the region”, and the Roșia Montană Project (RMP) is capable of providing the required economic stimuli and would serve to achieve the economic goal of sustainable prosperity.</p>
Solution	<p>The EIA also assessed a wide range of alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the RMP. But while other industries do not have this capability, their development in parallel is not precluded “and to the contrary, [the RMP] solves several key problems for attracting investment”.</p>

Clearly, the assessment of the no-project alternative has been undertaken in a full and considered manner.

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	3023
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 112906/25.08.2006
RMGC internal unique code	MMGA_1315
Proposal	Which is the conclusion of the economic analysis performed by independent specialists regarding the Romania's profit in the case of implementation and respectively rejection of the RMP?
Solution	Over the 17-year term of the project, US\$10.6 billion in economic activity will be generated – which is over 1% of the GDP of Romania on an annualized basis. Considering direct and indirect employment, over 17,000 full-time jobs will be created over some 20 years, according to the Applied Research unit of the University of Queensland based on a MEBA (Macro-economic benefits analysis) economic analysis conducted and reported in 2005. In addition, the project will secure the environmental rehabilitation of Roşia Montană's mining dereliction and polluted streams. If the project does not go ahead, this economic benefit will be foregone. It is also emphasized that development of other industries is not precluded by the RMP and indeed they would be bolstered by the project.

Domain	ALTERNATIVES
MMDD's item no. for the question which includes the observation identified by the RMGC internal code	50, 56
MMDD's identification no. for the question which includes the observation identified by the RMGC internal code	No. 114888/05.10.2006, No. 114674/02.10.2006
RMGC internal unique code	MMGA_1495
Proposal	<p>The EIA report does not analyze all alternatives to the project</p> <p>Chapter 5 of the Report on the environment impact assessment study (EIA) (<i>Assessment of Alternatives</i>) presents an assessment of all the alternatives that are appropriate to consider for the EIA and in line with the EIA Terms of Reference as issued by MEWM. This includes the “no-project” alternative.</p> <p>The Chapter also examines alternative locations for key facilities as well as alternative technologies for mining, processing and waste management, in line with best practice and as compared against published EU best available techniques (BAT) documentation.</p>
Solution	<p>The EIA considered alternative developments – including agriculture, grazing, meat processing, tourism, forestry and forest products, cottage industries, and flora/fauna gathering for pharmaceutical purposes – and concluded that these activities could not provide the economic, cultural and environmental benefits brought by the Roșia Montană Project (RMP).</p> <p>The examination of alternatives also evaluated the best mining technology, duration and staging of the project, mining and processing technologies, environmental management practices, site options for waste management facilities, transportation routes, and measures to prevent and minimize environmental impact.</p>