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Your team has done an impressive amount of work and I must say that it looks very well researched.

I have 2 observations:

- You mention only once, I think, the IRMA initiative. It is our strong believe and that of some of our key NGO mining experts in our partner countries that the IRMA is a very powerful initiative that will gain traction soon. We feel the IRMA should receive all support possible and in this light we are wondering if the IRMA references in the document should not be made stronger / more often.
- Regarding chapters F1 and F6 no reference is made to Strategic Environmental Assements while in some countries this is already a legal obligation for large, landscape impacting projects and in other cases the private sector has taken the initiative to perform a SEA for the landscape in which they are operating (e.g. the Rio Tinto QMM operation in Madagascar. Since often mining operations have several separate EIA's (e.g. one for the mine footprint, one for a slurry pipeline and another for the deep sea port facility) the cumulative impact on the landscape remains underestimated. A SEA for the broader mining landscape (thus broader than the legal concession boundaries) would seem to be a necessary exercise if we want to work towards reduced societal risk from the mining sector.