

ERDENES SILVER RESOURCES SALKHIT MINE CLOSURE PLAN PILOT

Newsletter Issue 2 November 2021

FIRST DELIVERABLE COMPLETE

REGULATORY REVIEW & REGULATORY CONCORDANCE TABLE

The first deliverable of Stage One of the Mine Closure Plan Pilot (the Pilot) is completed. It is a regulatory concordance/cross-reference table, which brings together the regulations, legislation, and technical guidance pertaining to mine closure in Mongolia.

REGULATORY REVIEW

To prepare this deliverable, the project consultants jointly conducted a regulatory review that included the Minerals Law, the Environmental Impact Assessment Law and subsequent regulation approved by the Minister of Mining and Heavy Industry and the Minister of Environment and Tourism. Gaps and overlaps were identified between the Regulation on Rehabilitation and Closure of Mines and Concentration Plants, its Guideline, and other documents such as the Erdenes Silver Feasibility Study and Environmental Management Plan for the Salkhit Mine.

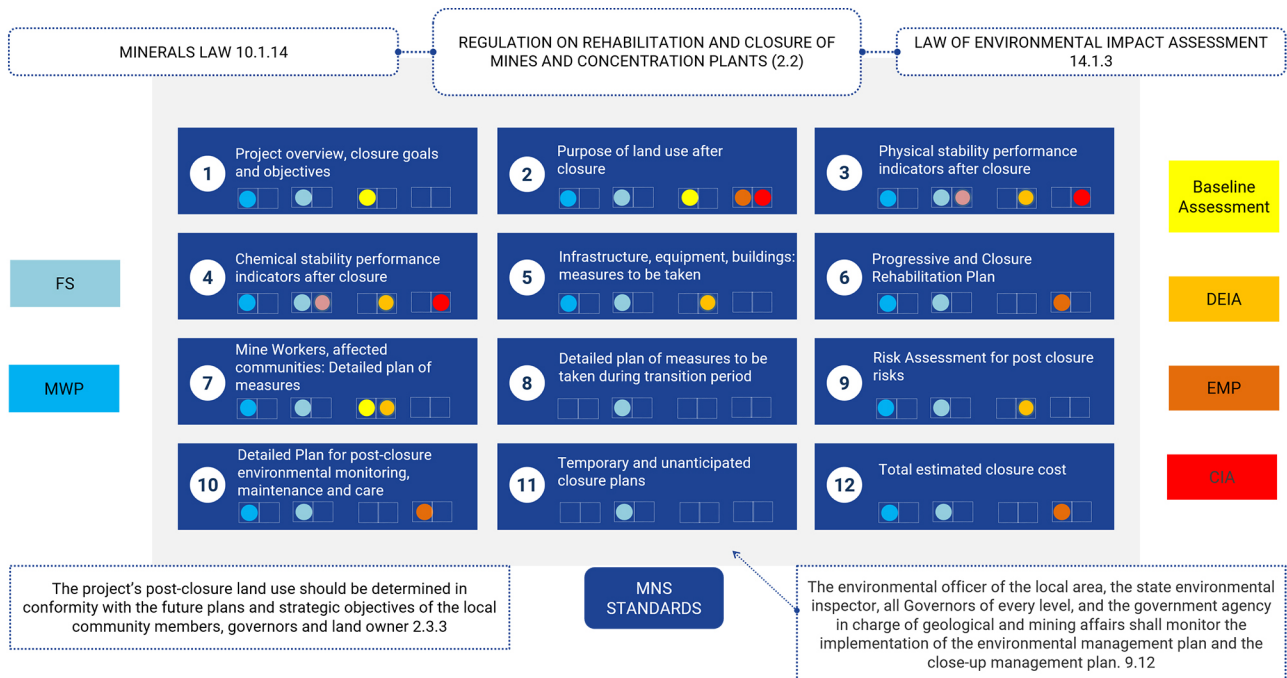


Table: Mongolian legislation by stages for the pilot

CONCORDANCE TABLE

The team developed a concordance table based on its regulatory review work. It is a tool used in countries such as Canada and the United States by regulators to review applications for completeness and adherence to regulatory requirements. It lists regulatory requirements and corresponding contents as a cross reference and therefore simplifies efforts from both regulators and project owners for screening of the contents. This is the first time a concordance table has been used in Mongolia and will set the stage for future regulatory applications.

INTERNATIONAL BEST PRACTICES IN MINE CLOSURE

By R. L. Noble-Pattinson, M.E.Des., EP

Environmental stewardship and social responsibility in the global mining industry, of which mine closure and reclamation are critical components, are now top priorities for mining companies, governments, and stakeholders around the world.

■ THE CANADIAN EXPERIENCE

Canada is a federation of ten provinces and three territories. Due to Canada's varied geology, many types of commodities are mined, including thermal and metallurgical coal, oil sands, potash, uranium, diamonds, precious gemstones, gold, copper, aluminum, nickel, iron, and cobalt.

Each of Canada's jurisdictions has policy and legislation in place which regulates all phases of the mining life cycle. The relevant documents are available as open source on the internet. Although the policies and legislation adhere to similar principles, they are each unique, due to several factors such as the relative maturity of the mining industry in the jurisdiction, population composition and density, financial security requirements, and environmental conditions and constraints. The latter – environmental conditions and constraints – is worth particular attention. In addition to following a province's or territory's mining legislation, mining companies are also required to follow the environmental legislation and regulation of the jurisdiction(s) in which they operate. Canada is a vast country with a variety of environmental conditions, and each jurisdiction has developed unique regulations to manage the impact of industry on their environment. The federal government provides guidance across the country by developing certain national standards for environmental quality.

■ INTERNATIONAL MINING ORGANIZATIONS AND THEIR RECOMMENDATIONS

Due to the increased importance placed on mine closure around the world, numerous international organizations have conducted research, involving various countries and companies, to develop international best practices. Some of these best practices are discussed briefly, but is not an exhaustive list.

▶ **The International Council on Mining and Metals (ICMM)** published the Integrated Mine Closure Good Practice Guide which "provides mining companies with the guidance needed to effectively integrate closure across the mining life cycle" (ICMM, 2019). The document details twelve tools mining companies can use to address topics such as the social aspects of mine closure, goals and objectives of mine closure planning, risk assessment and management, integrating climate change considerations, and monitoring and documentation.

<https://www.icmm.com/en-gb/guidance/environmental-stewardship/integrated-mine-closure-2019>

▶ **The Asia Pacific Economic Cooperation Mining Task Force** developed a Mine Closure Checklist for Governments, the purpose of which is to "provide a logical, sequential series of steps that will allow policy makers to identify gaps in their current mine closure framework and identify how to address those gaps" (APEC, 2018). Developed in the spirit of continuous improvement, the Task Force worked with governments in mature resource jurisdictions to obtain information on how mine closure policy and practice has worked in those countries.

<https://www.apec.org/publications/2018/03/mine-closure---checklist-for-governments>

▶ **The Mining Association of Canada (MAC)**, which represents numerous mining and mining services companies across Canada, champions the Towards Sustainable Mining (TSM) program. As per the MAC website, "the TSM Guiding Principles are backed by a suite of protocols that mining companies measure and publicly report their performance against in the annual TSM Progress Reports" (2021). Members of MAC publicly demonstrate their commitment to going beyond regulatory compliance, by participating in the TSM program.

http://mining.ca/sites/default/files/documents/TSM_Mine_Closure_Framework.pdf

and <https://mining.ca/towards-sustainable-mining/protocols-frameworks/>

▶ **The annual International Mine Closure Conference** is a global forum in which mining and related professionals come together to share the latest research, best practices, case studies and general knowledge related to mine closure. Corporations and governments can integrate lessons learned from attending this conference into their practices and policies.

CONTACT INFORMATION

For more information about the Pilot, please contact
Altangerel (Aagii) Radnaabazar

✉ r.altangerel@merit.mn