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To: The Minister for the Environment and Sustainable Development, Mr. Atilla Korodi
CC: The Minister for Culture and Cults, Mr. Adrian Iorgulescu
Object: The cultural heritage of the Rosia Montana site
RE: the replies by the Rosia Montana Gold Corporation (RMGC) to the contestations to the EIA Report

Dear Mr. Korodi,

Almost a year ago, in August 2006, we informed the Ministry that you are now heading that a part of the Environmental Impact Assessment Study for the Rosia Montana Project- *The Cultural Heritage Management Plan for the Historical Centre of Rosia Montana (MP)*- has been fragmented, truncated and altered by RMGC, a fact which constitutes a serious breach of the independent status EIA authors should enjoy and which undermines the validity of the entire EIA. We were already then informing you that we decline any responsibility for the documentation submitted to the Ministry, which consequently annuls that part of the EIA. It can therefore be concluded that the EIA documentation is incomplete as it does not address the problematic of the cultural heritage of the historical centre of Rosia Montana!

As a result of having analyzed the replies given by RMGC to the contestations to the EIA Report, we feel we have to return to the issues we have initially commented upon and readdress them herein. We have concluded from these responses that the situation has not changed even in the slightest detail: RMGC has not commissioned any other experts to rewrite the documentation which we have identified as null. The documentation that you are now submitting to the Technical Analysis Committee's analysis is still incomplete! Yet, beyond these observations, given that in the volume on the Cultural Heritage (Volume 2048- Information on the cultural heritage of Rosia Montana and its management), RMGC allocates an entire chapter to the contestation made by OPUS (Comparative Report on the Management Plan Written by SC OPUS SRL), we would like to specifically point out the following issues:

1. The professional competence of the EIA authors: within the working group who designed the EIA Report for the Rosia Montana Project, *the only experts on the protection of the cultural heritage accredited by the Ministry for Culture and Cults are the authors of the MP written by OPUS - Virgil Apostol and Ștefan Bâlici*. Because the documentation put forward by OPUS refers exclusively to this area of expertise - *the protection of the cultural heritage* - we deem unacceptable the motivation for the alterations made in this documentation, without the prior notification and consent of its authors and based only on the alleged increased competences that the editors of the EIA have been bequeathed. The editors are not entitled, by means of their expertise and their professional qualifications, to pass any judgment on the *evaluation and protection of the cultural heritage!* In fact, the modifications which have been brought to our original study were clearly aimed at distorting the uncomfortable conclusions of the report as we will show below.

2. The altering of the conclusions of the MP: from the entire documentation there were systematically removed references to the cultural landscape of Rosia Montana¹; the result of our

¹ I.e. "The subtitle and sentences regarding the cultural landscape have been removed based on the recommendations made by the general editor of the EIA documentation, *as it was necessary that this content be in accordance with the chapter on landscape of the EIA report* [...] The footnote was removed by deleting the sentence. The experts – accredited EIA – for landscape issues *did not agree with the interpretation and the screening proposed by OPUS*" (sic!), page 8, altering 9.

assessment - the confirmation of the exceptional value of the site - has also been censored²; not less eloquent in proving the motivations by which RMGC has been driven when altering our report is the deletion of any reference made to the potential danger that the Mining Project poses to the cultural heritage of Rosia Montana³.

All these types of modifications to the MP, along with many others, have as a consequence the distortion of the initial claims in the documentation which were meant to ensure the protection and management of the cultural heritage of the site, in all forms and types of manifestation. The typological characteristics and the value of the site, as they have been determined in the study, place it among the cultural landscapes with an exceptional value, a potential World Heritage Site! But following the alterations made by RMGC, any reference to such conclusions has been removed.

3. RMGC's evaluation of the cultural heritage of Rosia Montana continues to be in flagrant contradiction with the opinions expressed by the international scientific community. We here make reference to only the most recent position taken by the International Council for Monuments and Sites, Mr. Michael Petzet, on this matter, in a letter to the Prime Minister of Romania. Therein he reasserts his concerns about the mining project proposed by Rosia Montana Gold Corporation, which "is threatening to destroy the environmental, archaeological and architectural values of the site, one of the oldest and most valuable mining ensembles in Europe and around the world". Furthermore, Mr. Petzet conveyed that "ICOMOS would gladly support any initiative for the preservation and enhancement of the historic monuments and sites of the area" while at the same time he expressed his hope that the "impending disaster in Rosia Montana" will be averted.

To bring to your attention the many issues of utmost concern which RMGC has disregarded, we would like to herewith request an appointment with you, Minister.

Sincerely yours,

Virgil Apostol

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Architect, empowered to sign, Msd in history at the 'Vasile Parvan' Institute of Archaeology of the Romanian Academy, Bucharest
Accredited expert in the protection of historical monuments
Secretary, Association for "Architecture. Restoration. Archaeology", Brasov
Manager, OPUS – Architecture Studio, Bucharest

Ștefan Bâlici,

Author of the Cultural Heritage Management Plan for the Historical Centre of Rosia Montana (MP)
Architect, empowered to sign, Msd in visual arts at the National University for Arts, Bucharest
Expert, empowered to sign, in territorial management and urbanism
Accredited expert in the protection of historical monuments
Vice-President, Association for "Architecture. Restoration. Archaeology", Brasov
Manager, OPUS – Architecture Studio, Bucharest

² i.e "the protection of the site's exceptional value [...]" set up as a strategic objective in the MP, becomes, in RMGC's version, "the protection of the site's value", with the explanation that "the repeated and excessive use of the quality 'exceptional' does not correspond with an obvious reality in relationship with other large/important sites from Romania or from other parts of the world."

³ As such, "The mine operation designed by RMGC, at a much larger scale than the actual one, constitutes a considerable potential danger" becomes "The mine operation designed by RMGC, at a larger scale than the actual one, could constitute a potential impact." [sic!], page 3, altering 20 or "[...]program 26. To discourage any kind of projects, outside the site's territory, that tend to produce adverse effects on the site [...]"; RMGC's comment : "this text has been deleted"!, page 16, altering 24.