

Evaluation of the Rosia Montana EIA Report with an accent on Biodiversity by Jozsef Szabo

Summary Translation

General Observations on the Chapter *The Flora and Habitats in Rosia Montana*

In the biodiversity study, the methodological section there is a minute description of the research stages for the study of the flora in Rosia Montana and Corna Valley, the areas where the investor plans to open the largest open mine in Europe. In this methodological chapter we find the following statement: “during sample collection the map of the vegetation was continuously and progressively updated based on observed vegetation distribution models and the characteristics of the specific areas”. This phrase and the methodology described at pages 14-15 leave unattended the following issues:

-on page 17 a set of “*Carex* (*C. acutiformis*, *C. riparia*, *C. gracilis*, *C. inflata* etc.)” are enumerated which are not afterwards included in the comprehensive list of plant species found in Annex 1.

-if on page 17 *Hieracium transsilvanicum* is mentioned as a “differentiated” species of the dacian beach forests in Rosia Montana and its surrounding areas and also of the pure spruce fir which in fact are associated within the researched area (*Hieracio transsilvanicae-Piceetum Pawl et Br. – Bl. 1939 em. Borhidi 1957*) (middle section of page 18), this species is not found in Annex 1. On page 19 we find the following phrase: “in these areas one can find the juniper tree which is grouped into *Vaccinio-Pinetum mugi* Hadac 1956, Jenik 1961 associations. Obviously, *Pinus mugo* is not referenced in Annex 1, even though it would be important to have it included as this association forms a priority habitat according to the Habitat Directive: *4070) The species that indicate the presence of the floristic associations described at page 20-and we are referring specifically to *Thymo comosi – Seslerietum rigidae* Zolyomi 1939, *Sedo hispanici – Poëtum nemoralis* Pop et Hodi^oan 1985 are not included in the list of species in the study’s Annex 1. A lot of species included in the description and characterization of the forest habitats (pp. 30-42) are not found in the list of species in Annex 1 (e.g. *Anthenaria dioica*, *Viola reichenbachiana*, *Galium odoratum*, *Lathyrus vernus*, *Carex digitata*, *Dactylis polygama* –to name only a few from a list that includes more than 20 species).

Other observations about the Introductory Chapter:

On page 10, at the end of the chapter “The Local Context” the conclusion is drawn that “the entire Aries river basin is a natural patrimony with a distinct scientific value”. On page 19 we find the enthusiastic phrase: “in the structure of the grasslands one can remark the high specific diversity, where vegetal species of the most spectacular kinds can be found, that together, given their colors make the former some of the most beautiful grasslands in our country”. On page 20 we learn that “the perimeter of the future project is located in an area which is on no major interest as far as

biodiversity is concerned” and on page 21 that “this area is one of the most severely impacted areas in Romania, with the biodiversity being particularly affected”.

In the middle of page 10 we find Figure 1.1. “The European Bio-Geographical Areas”, which is misplaced in the context described above and furthermore it is a flawed drawing that apparently aims to understate the richness and diversity of bio-geographical areas in Romania (see the bio-geographical areas in the Romanian Habitats Manual, Donita et al., p. 23).

On page 21, Figure 3.6.: there is no mention of the data source for this figure and the year it dates from. Rosia Montana is not indicated on the map which is drawn at such a large scale that the village cannot be located on it. (later it is stated that a large density of the human population in Rosia Montana can be observed on this map)

Page 21, paragraphs 4 and 5: it is known that the secondary agricultural habitats that are farmed with traditional means represent, in many cases, habitats rich in species of organisms that have lost their primary habitats (Poschlod & Wallis-DeVries 2002, Baur et al. 1997, 2004). Therefore, the traditional agricultural habitats cannot be deemed “impacted”. The initial natural integrity cannot be debated over given the fact that there are extremely few areas which have not been impacted by human activities around the globe.

On the issue of the “natural equilibrium” mentioned on page 21, paragraph 5: in the last decades of ecological research we have been demonstrated that this concept has been invalidated and can lead to erroneous interpretations. Ecosystems and populations seem constant and balanced when observed on a specific temporal and spatial scale but at other levels they can be shown to be dynamic (Pickett et al. 1992). Therefore, this study cannot overlook the dynamics of the communities on a long term and the likely impact the mining project will have on them.

On the principle of ecological imbalance (page 22, paragraph 4): this often gives birth to very diverse communities. Numerous ecosystems from both tropical and temperate regions depend on perturbing processes that maintain the biodiversity (Meffe & Carroll 1997). The fact that there has been a perturbation of the geological layer in the past cannot prompt us to conclude that this ecosystem is poor in terms of biodiversity. It must be underscored that the Management Plan for the “Natura 2000” sites (in the countries where this network is functional) that preserve secondary grasslands, include intervention measures (e.g. grazing and mowing). Within clear limits these interventions are compulsory and even paid for.

The statements on page 24, second paragraph: numerous studies have pointed to the importance of semi-natural ecosystems in terms of their biodiversity when they are maintained through traditional agricultural practices Erhardt, 1985a, Erhardt, 1985b, Erhardt Thomas, 1991, Groombridge, 1992, Baur et al., 1997, Baur et al., 2002, Fischer Wipf., 2002, Poschlod Wallis-DeVries, 2002, Pykälä, 2003, Reif et al., 2003, Waldhardt Otto, 2003, Baur et al., 2004, Poschlod et al., 2005, Pykälä et al.,

2005, Rusdea et al., 2005). These semi-natural habitats cannot be regarded to be on no importance.

On page 25, paragraph 2: in terms of biodiversity, the fact that the farming land take up a surface of about 1% is irrelevant. Also the term “unproductive land” is not relevant in the context because this is a study that considers the biodiversity and not agricultural activities.

Even though the authors try to prove the negative impact human interventions have had on grasslands and for that reason, underscore the latter’s reduced value, in terms of biodiversity, on page 27 we learn that “the use of natural grasslands for grazing and mowing is a paradoxical source of biodiversity. The heterogeneity of the vegetation is favorably influenced by this mode of use. At present, when the aggression against natural systems is so intense, grasslands have an essential role in maintaining the landscape. (point 3.1.5.3.). Please also note the absence of diacritics from the original document.

Conclusions

The botanical section of the EIA Report is utterly incoherent. One can notice a series of contradictions between the fundamental arguments in the text, from one page to another. Principles that are formulated on one page are contradicted several pages thereafter. The conclusions can therefore only be false. As far as the characterization of the flora goes, vegetal associations are enumerated and described as being part of the researched area. However, not even the most important species for these associations are mentioned in Annex 1, “The Systematic List of Plant Species Identified in the Rosia Montana area”

There is, arguably, a complete incongruence between the Species List in Annex 1 and the narrative section of the report. The plant species enumerated in the Annex should have also been included in the report, on the characterization lists for the habitats or the vegetal associations. Even though they make up only 18% of the forest habitats they are described in approximately 20 pages. However, secondary grasslands are not at all described when types of forests are discussed, even though they make up 60% of these habitats. There is a vague reference to several associations but there is no description of them therefore no direct link with Annex 1 can be established. Consequently, specific grassland habitats are not described even though the law requires that (L 345 din 2006, Ord. 863 din 2002). The same piece of legislation also stipulates that it compulsory that plant species are analyzed, to establish their place in the Red Lists, an analysis which has not been included in the study or its annexes.

PERSONAL INFORMATION

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Nationality Romanian

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WORK EXPERIENCE

- Dates (from – to) **FROM 1999 – 2004 NOVEMBER**
- Name and address of employer Romanian Ornithological Society/BirdLife Romania (Gh. Dima str. 48, Cluj Napoca)
 - Type of business or sector Environmental and bird protection
 - Occupation or position held Important Bird Area Conservation Officer
- Main activities and responsibilities To coordinate the protection and monitoring of Romania's most important sites for birds

- Dates (from – to) **BEGINNING WITH 2004 NOVEMBER**
- Name and address of employer Otus Society for Nature Protection
- Type of business or sector Environmental protection
- Occupation or position held Program Officer
- Main activities and responsibilities To create projects for strengthening the NGO's capacity

- Dates (from – to) **FROM 2005**
- Name and address of employer WWF Danube Carpathian Program (Mariahilfer str. 9, Wiena, www.wwf.org/dcpo)
- Type of business or sector Environment
- Occupation or position held Biology consultant
- Main activities and responsibilities To coordinate site designation for priority habitats in Romania

EDUCATION AND TRAINING

- Dates (from – to) **Beginning with 2000**
- Name and type of organisation providing education and training Babes Bolyai University Cluj Napoca
- Principal subjects/occupational skills covered Biology, birds
- Title of qualification awarded Phd Student

- Dates (from – to) **1997-1998**
- Name and type of organisation providing education and training Central European University Budapest

- Principal subjects/occupational skills covered Environmental Sciences and Policy
- Title of qualification awarded
- Dates (from – to) **1991-1996**
- Name and type of organisation providing education and training Lucian Blaga University Sibiu
- Principal subjects/occupational skills covered Environmental Sciences and Biology
- Title of qualification awarded Master of Sciences

PERSONAL SKILLS AND COMPETENCES

MOTHER TONGUE **HUNGARIAN**

OTHER LANGUAGES

- Reading skills **ROMANIAN** EXCELLENT
- Writing skills EXCELLENT
- Verbal skills EXCELLENT

- Reading skills **ENGLISH** EXCELLENT
- Writing skills GOOD
- Verbal skills GOOD

SOCIAL SKILLS AND COMPETENCES

As a student I've volunteered at many environmental protection oriented organizations, and I am a foundation member of Romanian Ornithological Society/BirdLife Romania, Otus Association for Nature Protection and Ecotour Sibiu. According to the circumstances I always work in a multicultural environment.

ORGANISATIONAL SKILLS AND COMPETENCES

As IBA Conservation Officer I've set up a network of 27 IBA caretakers for the monitoring and protection of Romania's most important sites for biodiversity. Editor of IBA Best Practice Guide for Romanian caretakers, IBA Newsletter. Set up the network for the National Common Bird Monitoring Scheme (more than 120 volunteers). Implemented training courses for new volunteers and participated at many international workshops and trainings that were necessary to my job (on lobbying, communication and others) Set up a network of volunteers for National Waterfowl Census (more than 30 volunteers).

ARTICLES PUBLISHED

Over 35, in Romani and abroad mainly on Bird protection and related issues

DRIVING LICENCE(S)

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