

Analysis of the EIA report

The present report was written in response to the **Report on the Environmental Impact Assessment Study** submitted by the Roșia Montană Gold Corporation (RMGC) to the Ministry of the Environment and of Water Management in order to obtain the environmental accord necessary for the Roșia Montană mining project.

Based on our analysis of social, economic, environmental and community implications of RMGC's EIA report, we recommend that the minister **should not grant the environmental accord** for the project proposed by the RMGC. In what follows, we substantiate our recommendation by presenting substantive concerns as well as methodological flaws we found in RMGC's EIA report.

From a methodological point of view, we note the following flaws:

- Some of the statistical data presented in the report are false, misrepresent similar data from statistical yearbooks or do not cite any reference.
- Some of the statistical data presented in the report are truncated and present numerous overgeneralizations or incorrect extrapolations.
- Some of the interpretations of the statistical data presented in the report are simply wrong or biased.
- The terminology used is not consistent throughout the report, which is confusing.

These methodological flaws lead to incorrect and unsubstantiated conclusions that should not be factored in the objective analysis of the impact that the RMGS project would produce. The false data and the biased interpretation of population data represent serious warning signals as to the validity of the other data the RMGC presented so far in its EIA documentation.

1. Community: living conditions

This report analyzes the initial living conditions of the affected community. Considering that there is no study of the living conditions of the community, we took into consideration the following documents: *Study on the initial conditions of the cultural heritage, Community health indicators, Subchapter 4.8 -Social and economic environment-part of the Potential impact chapter, Subchapter 4.9 –Cultural and ethnic background and cultural heritage – part of the Potential impact chapter, Management plan for the cultural heritage, Plan for the sustainable development of the community.*

1.1. Community: definition

The EIA report defines the affected community and its environment in several chapters that all emphasize how much the community needs the RMGC project as the only solution to its survival. The assessment of the social and economic environment is based on analyses of social, economic and environmental parameters.

The *Plan for the sustainable development of the community* defines the target community as the sum of all people who live in the direct impact zone of the RMGC project, as well as in the towns of Abrud and Câmpeni, based on their strong socio-economic and geographic ties with the direct impact zone. It follows that any analysis of the community needs to consider the towns of Abrud and Câmpeni. This strongly challenges the conclusion of the EIA report with regard to the initial living conditions of the affected community. In this

study, whenever we refer to the “Roșia Montană community” we mean the population living within the administrative boundaries of the Roșia Montană village; when we use the term “community” we mean all the people living in the Roșia Montană village and in the towns of Abrud and Câmpeni.

Our analysis starts from the conclusions presented in *Defining the community*, chapter that is part of the *Plan for the sustainable development of the community*¹. In the analysis, we will reference also other chapters or subchapters on the affected community.

Overall, most references to the community in the EIA report are meant to highlight that Roșia Montană is an isolated monoindustrial area, with a rapidly ageing population, plagued by serious environmental problems, boasting living conditions well below the national average in an area in which alternatives to the RMGC project do not exist. Without romanticizing the situation of the community in Roșia Montană, Abrud or Câmpeni, we consider that the data presented in the EIA report are incorrect, are biased and greatly harm the image of the community.

In what follows, we will analyze instances of this kind that appear in the EIA report.

1.2. Social characteristics

Although the report defines the community as inclusive of the population in Abrud and Câmpeni, the report’s conclusions refer only to the population in the Roșia Montana village. This represents a first contradiction between the data and the terminology used. We will discuss and debunk several key arguments that the EIA report makes.

1.2.1 “The population is ageing, the best represented demographic group being old women who are often widows”.²

The ageing of the population is not a characteristic of Roșia Montana only, but a national characteristic of the rural and urban population. According to the 2002 **Population and Housing Census**, the age group of young persons (under 15) decreased, while the age group of people over 60 increased. The effects of population ageing on the economic and social life are manifest also in the dependency relationships of youth, adults and the elderly. Thus, from 1992 to 2002 the ratio of youth to 1000 adults decreased from 373 to 279, while that of elderly increased from 269 to 307. In 2002, there were more old people than young people in Romania, the ageing ratio –the number of old people per 1000 youth- was 1098, in marked increase from 722 in 1992³.

As a result, population ageing is a national process, not a regional one, and it has to be quantified and factored into plans for economic development. Furthermore, this national process speaks to the utility of a new model of economic development based on changing demographic patterns. Population ageing is not the negative characteristic of a certain area, like Roșia Montană, and hence cannot be used as a moral, economic and social argument to justify an economic project that excludes, from the very beginning, the elderly it purports to save.

¹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

² Plan for the sustainable development of the community, Chapter 5: Defining the community.

³ Ivan-Ungureanu, Clementina – 2002 Population and Housing Census; Population – demographic structure, Foreword, pp. 5-6.

Regarding the proportion of old women in the community, national statistics show that women consistently outnumber men, representing 50.8 % of the national population in 1992 and 51.3% in 2002. Women outnumber men starting with the 40-44 age groups. It follows that a national phenomenon is again turned into a negative characteristic of the population in Roşia Montana in order to justify the need for the RMGC project.

Other data referring to the gender and age break-down of the population are misinterpreted as well. Figure 4.3.–The age pyramid in Roşia Montana⁴ shows the ratio of men to women in various age groups. The caption reads that “*the most numerous age groups are old widows and married men*”. This statement does not reflect what the figure shows and is aberrant, as the group of married men has its counterpart in married women, a group that was excluded from the category of “the largest age group”. At closer scrutiny, Figure 4.3 shows that old women are not the largest age group; on the contrary, in each of the 60-69, 50-59 and 40-49 age groups, there are no big differences between the number of men and that of women. At the same time, men aged 20-29 outnumber the group of women aged 70-79 and that of women over 80.

Men also outnumber women in the 15-50 age group. The opposite is true for people over 50. This change of pattern can be explained by the premature deaths caused by pulmonary disease and work accidents affecting men who worked in the mine. Considering this, as well as the lay-offs in the mining sector, the demographic pattern in Roşia Montana⁵ will plausibly change; one can reasonably argue that the decline in mortality related to mining will reduce the imbalance between men and women in Roşia Montana⁶.

As to the community dynamics presented in Figure 4.2⁵, one can see that the imbalance is larger in Abrud and Câmpeni than in Roşia Montana⁶. This shows that the population in Roşia Montana⁷ has a much more balanced gender break-down.

Incorrect data are present in the explanations for Figure 4.4 as well: “*the gender break-down for family heads is 25% women and 75% men*”. The following sentence, though, reads that “*...the proportion of men who are family heads is slightly over 80%*”⁶. Math errors cease to be a surprise when **Table 2-1 Study of the initial socio-economic conditions** calculates that interviews were taken with “*456 family heads who could be relocated, namely 331 family heads in Abrud and 317 in Roşia Montana*”⁷.

Although there are no supporting data, the report argues that “*considering the fact that the RMGC already purchased 42% of households, the social structure of the area was irremediably altered*”⁸. If this statement were true, it would directly make the RMGC responsible for all the negative aspects that characterize, in RMGC’s view, the community at present. Consequently, the conclusion would be that RMGC’s presence in the area was of the most inauspicious kind.

⁴ Chapter 4.8 Social and economic environment, section 4: Overview of the initial socio-economic conditions, p. 21.

⁵ Chapter 4.8 Social and economic environment, section 4: Overview of the initial socio-economic conditions, p. 20.

⁶ Chapter 4.8 Social and economic environment, section 4: Overview of the initial socio-economic conditions, p. 21.

⁷ Chapter 4.8 Social and economic environment, section 2: Methods of assessing and predicting the impact on the social and economic environment, pp. 13-14.

⁸ Plan for the sustainable development of the community, Chapter 4.1 Direct impact, p. 37.

1.2.2 “Married men working in the mining sector represent the largest group.”⁹

The report contains no straightforward data on the proportion of married men working in the mining sector.

Moreover, **Figure 5.8 Roșia Montană – structure of jobs**¹⁰ shows that the number of jobs in the mining sector increased in 2004, which is a false statement contradicted by the lay-offs in the mining sector in that area. The new jobs that the RMGC created in 2004 cannot be classified as pertaining to the mining sector; as a result, they cannot be included in the category of “*married men working in mining*”. The fact that the RMGC created jobs in other sectors than the mining one is testimony to economic activities that represent a viable alternative to mining. **Figure 5.9 –Jobs in Câmpeni**¹¹ suggests that the area is not dependent on mining and can sustainably develop without it.

1.2.3 “Demographic decline is due to low birth rates and to the massive lay-offs in the mining sector that led to the migration of the youth in search of better life opportunities”¹²

According to the two most recent national censuses, the total population in Romania decreased by 1.1 million from 1992 to 2002, at a rate of -0.5% per year. Population shrinking was affected by the marked decrease in birth rates coupled with immigration.¹³

Thus, demographic decline is a feature of our times. There are no data in the EIA report to support the argument that the lay-offs in the mining sector contributed to the migration of youth. Furthermore, youth migration to urban areas will most likely continue, even in the case of new mining projects initiated in the area; this has to do with youth aspirations to higher education and new opportunities and has nothing to do with mining per se.

Concerning the ratio of working and non-working population, it ought to be mentioned that of the total population of 21,681 million people in the 2002 census, the working population counted 8,851.8 people (40.8%). In other words, 12,829.1 million people (59.2%) were recorded as non-working.¹⁴ For comparison purposes, the working population (39%) and the non-working population (61%) in Roșia Montană¹⁵ are very similar to the national breakdown. This shows that Roșia Montană is the norm, rather than the exception in Romania.

1.2.4 “Jobs are largely dependent on the mining sector”¹⁶

⁹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

¹⁰ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 58.

¹¹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 58.

¹² Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 49.

¹³ Ivan-Ungureanu, Clementina – 2002 Population and Housing Census; Population volume 1– demographic structure, Foreword, pp. 5-6.

¹⁴ Ivan-Ungureanu, Clementina – 2002 Population and Housing Census; Population volume II – Social and economic structure Foreword, pp. 5-6.

¹⁵ Plan for the sustainable development of the community, Chapter 5: Defining the community, Table 5-6, pp. 57.

¹⁶ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

Jobs were overwhelmingly concentrated in the mining sector in Roșia Montană and in Abrud due to many opportunities in this industry. Against the background of socio-economic and demographic change, statistics show that the population manages to cope with change and with the lay-offs in the mining sector. In this respect, the comment for **Figure 5.8. Employment structure and trends in Roșia Montană, population dynamics and job dynamics in Roșia Montană** argues that “*despite the demographic decline, the proportion of the working population increased*”.¹⁷ This very argument shows that jobs are independent of mining. In the same vein, the EIA report cites the positive example of Câmpeni where “*...the diversification of jobs across several economic sectors and the lack of dependency on a single industrial sector (mono-industry) considerably influence economic and social development*”¹⁸.

1.2.5 “*In Roșia Montană unemployment is on the decrease due to the presence of the RMGC company.*”¹⁹

As discussed above, the RMGC company itself showed that the area has the capacity to train and retrain the workforce in sectors other than mining and that there are both seasonal and permanent hires in other sectors. The presence of RMGC in the area prevented the development of other economic or agricultural activities that could have created jobs. The General Plan for Urbanism (PUG) submitted by the RMGC and approved by decision of the local council (no. 45/19.07.2002) stipulates that most of Roșia Montană is an industrial area, in which mining is the only legal activity allowed. Declaring the western part of the village as constituting a monoindustrial area greatly affected the whole village and led to significant transformations. The PUG and PUZ stipulate a nine fold increase in the industrial surface of Roșia Montană. The surface declared as industrial area amounts to 1,614 hectares. Most of the industrial area is within the perimeter of Roșia Montană and the remaining is in Abrud. Before 2000, the industrial area counted 180 hectares, of which 26.8 hectares were quarries. Of the 1,614 hectares of the monoindustrial area, 1,089 hectares (67.5%) are private property. The change of status to industrial area affects 47% of the population in that area and 838 households. This is a crucial point for analyzing the development of Roșia Montană. Although people are active in sectors other than mining (e.g. agriculture, tourism), none of these alternative economic activities can be proven because they are de facto illegal. In conclusion, the RMGC had a negative impact on the development of Roșia Montană, not a positive one as the company claims.

1.2.6 “*School attendance is in decline at the regional level, which reflects the population dynamics.*”²⁰

Demographic decline at the regional level is a fact, it does reflect the general population dynamics, but it does not single out Roșia Montană. The number of school-age children and implicitly of school teachers decreased at the national level. This decrease was particularly prominent in rural areas.

¹⁷ Plan for the sustainable development of the community, Chapter 5: Defining the community, p.58.

¹⁸ Plan for the sustainable development of the community, Chapter 5: Defining the community, p.59.

¹⁹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

²⁰ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

1.2.7 “With a few exceptions, health risks for the people of Roșia Montană are significantly higher than in the region.”²¹

According to data presented in **Community health indicators (chapter 3.2. Comparative perspective on disease prevalence in Roșia Montană, the county of Alba and România)**,²² the following diseases have a higher prevalence in Roșia Montană as compared to the national or county average: heart disease, high blood pressure, cardiovascular disease, and chronic lung disease. The diseases that have a much lower prevalence in Roșia Montană as compared to the national or county average are: diabetes, anemia, ulcer, cirrhosis and cardiovascular malformations. Of the 9 diseases taken into account, 4 have a higher prevalence in Roșia Montană than the national or county average, whereas 5 have a lower prevalence. In conclusion, the previous statement on community health is not warranted.

At the same time, the EIA report draws our attention to the fact that “the situation is much more serious for people who don’t have health insurance, like the non-working population”.²³ This statement is false, as only part of the non-working population does not have health insurance. For instance, pupils, students and retirees are counted in the non-working group, but their health insurance is covered by the state. The report recurrently stigmatizes the retirees, by statements such as: “The high number of retirees reduces the workforce available for economic activities; it is the working population who provides for them.”²⁴ The group of retirees cannot possibly reduce the workforce available, simply because they are not part of it. The interpretation that the working population provides for retirees is also biased. When they were part of the workforce, the retirees paid their dues to retirements funds, which is meant to cover their retirement pension. The retirees participate in a social circuit that should not be understood in simplistic terms. The statement above clearly illustrates that the RMGC misunderstands or denies a whole socio-economic system. The elderly represent an important social group who plays an important role in community development, role that ought to be valued, not stigmatized.

1.2.8 *The locals’ perceptions and expectations*

The perceptions and expectations of the locals regarding the RMGC project are only superficially touched upon in the EIA report and the references to the sources cited are faked. “In order to assess the locals’ perceptions and expectations, an independent organization (ICCV) organized discussions with the various interest groups in Roșia Montană”²⁵ Footnote no. 34 references this statement to „page.50Page:74” (sic!); however, page 50 of the report contains no such information and page 74 is the page where the statement is made in the text. Thus, it is impossible to verify the data based on which the community is divided in “1. Persons who support the mining project at Roșia Montană, 2. Persons who oppose the mining project”. This black-and-white division is unrealistic and simplistic, as opinions about the project are much more diverse in the community and can hardly be characterized as either pro or con. The data according to which support for the project comes from the youth, business men, trained professionals, and the Roma, whereas the project opponents are the elderly and the women, are completely false and cannot be substantiated.

²¹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

²² Pp. 19-23.

²³ Plan for the sustainable development of the community, Chapter 5: Defining the community, p.73.

²⁴ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 58.

²⁵ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 74.

1.2. 9 Conclusions about social characteristics

None of the social characteristics analyzed in the EIA report suggests a state of crisis of the community in Roșia Montană. No real data support the interpretation that the community in Roșia Montană is the exception from the rule, with its ageing population, high percentage of non-working people and of women. On the contrary, these allegations greatly harm the image of the community in Roșia Montană.

Furthermore, if one takes into consideration also the community in Abrud and in Cămpeni, all conclusions allegedly representative for the “community” are incorrect.

1.3 Economic characteristics

1.3.1 “The infrastructure of buildings, roads and public utilities is in very bad condition; Information and telecommunication systems are badly implemented, but improvements are under way.”²⁶

“Present living standards in the community are well below EU standards”, as stated in chapter 4.6.1.2. **Housing – living standards**²⁷. Figure 4.14 shows the state of basic services, such as drinking water, sewage and electricity. The data presented also in Chapter 5 –Defining the community in the Plan of sustainable development for the community show that most households are connected to the electric grid and have wood-based heating systems. Wood-based heating is used in all three communities (i.e. Roșia Montană, Abrud, and Cămpeni) to a roughly comparable degree, which argues that it is not poverty, but rather efficiency and convenience that determine preferences for wood-based heating. Over 20% of the locals in Roșia Montană had a toilet in their house, whereas the national average is 12%.²⁸ Almost 90% of households in the rural areas are not connected to the sewage system; the corresponding percentage of households in Roșia Montană and Abrud in this situation is close to this national figure.²⁹

Living standards in Roșia Montană are in no way different from general living standards in rural Romania; on the contrary, in some respects the infrastructure in Roșia Montană is better than the national average.

In conclusion, Roșia Montană does not stand out negatively in terms of poverty level and living standards.

Chapter 5.9. **Infrastructure**³⁰ does not clarify whether the analysis of the infrastructure is limited to Roșia Montană only, whether it includes also the county of Alba, or the larger community in Roșia Montană, Abrud, and Cămpeni. Contradictory statements abound. Subchapter 5.9.2. reads that “*there is no public garbage disposal service*”. This is a false statement, as this system exists and is currently improved at the level of the village. Also, the Local Council in Abrud obtained the amount of 589,181 Euros from the PHARE

²⁶ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

²⁷ Chapter 4.8. The social and economic environment in Roșia Montană, Section 4: Overview of initial socio-economic conditions, p. 33.

²⁸ FSD- rural Euro barometer, 2005.

²⁹ FSD- rural Euro barometer, 2005.

³⁰ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 79.

2003 Program– Social and Economic Cohesion, *Investment plan for the project for selective garbage collection and for building a transfer point in the area of Abrud, Roșia Montană, Bucium and Ciuruleasa*. This new garbage disposal project will be put into practice soon.

1.3.2 *“The mining sector is crucial for the economy of both Roșia Montană and Abrud, but is less important for the town of Câmpeni”.*³¹

As we demonstrated in a previous paragraph, the mining sector is indeed important but it is not crucial for the sustainable development of the area. Mining activities in the past created a system of sites, artifacts, practices and values that can be capitalized upon in tourism.

1.3.3 *“The RMGC has a distinctive and marked impact on the area, local investments amounting to 124.4 billion lei in 2004.”*³²

RMGC’s activities carried out before the company obtained the necessary permits to start the project are not related to mining and do not contribute to the development of the area. We draw attention to the fact that the RMGC is a private company with a well defined interest in the area, and who will cease its local investments if it does not get the permits it needs.

At the same time, RMGC’s presence stopped any other investment in the area, due to the changes in the General Plan for Urbanism. In conclusion, RMGC’s presence in the area is inauspicious and does not constructively contribute to the development of the area.

1.3.4 *“The steep slopes and the high altitude are improper for agriculture and orchards.”*³³

Agriculture in Roșia Montană is both a complement to household income and a full-time job at the level of farms. Local and county statistics miss the income generated by agricultural activities for two reasons:

- a. The General Plan for Urbanism does not allow for legal agricultural activities.
- b. Complementary income from agricultural activities has never been properly researched and captured by statistics.

Considering the lack of reliable data about agriculture, the statement according to which only subsistence agriculture is viable is in fact false. There are initiatives to create pig farms, a milk collection system, a small dairy farm, and to constitute associations of producers. All these represent viable alternatives to mining, but they could never materialize because the 2002 General Plan for Urbanism did not legally allow for their existence. Considering the quality of the soil and the traditional agricultural practices, agricultural products can be classified as organic, which would respond to the growing need of organic products on the Romanian and foreign markets. Thus, it is not industrial agriculture, but organic and dynamic agriculture that constitutes a viable alternative for the area. According to the EIA report, the soil in Roșia Montană is not polluted with heavy metals. Considering also that the local farmers never used chemical fertilizers, organic agriculture has a bright future in Roșia Montană.

³¹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

³² Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

³³ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

1.3.5 *“The forests are often cut before the trees mature, in order to be used for heating (99% of households) and for cooking (60% of households), which negatively impacts the environment.”*³⁴

The EIA report contains no data on the extent of illegal cutting of trees in the area. Therefore, we consider that the statement above represents a false value judgment, as it is based only on the fact that most households use wood-based energy. In fact, the total stripping of forests proposed in the RMGC project is much more deleterious to the environment than the current degree of tree cutting. To reiterate, it has not been proven that tree cutting activities violate the law on legal tree cutting. Illegal tree cutting, if found out, must have been sanctioned according to the law. The report, however, contains no statistics and sources based on which one can check the validity of the statement about illegal tree cutting.

1.3.6 *“Tourism in Roșia Montană is insignificant and underfunded, as is regional tourism.”*³⁵

The data on tourism in the EIA report are truncated and contradictory. Contrary to the bleak prospects for tourism stated above, the **Plan for the management of the cultural heritage –chapter 2.3.4.3. Tourism**³⁶ argues that *“in the context of gradual bankruptcy of the mining industry in the Apuseni Mountains and of adequate investments, the development of tourism in the area remains a significant option for the future”*. By contrast, the **Plan for the sustainable development of the community –chapter 7. Investment in Roșia Montană**³⁷, states that *“in essence, demand in tourism, particularly in an isolated village like Roșia Montană is insignificant. This is demonstrated by data and studies presented in subchapter 5.3. Tourism.”* Considering that there is no such chapter 5.3. Tourism in this report (chapter 5.3 is titled Interested parties, p. 47) we challenge the general validity of the information presented and draw attention to other studies about tourism. Furthermore, **Figures 5.16 and 5.17**³⁸ do not mention the source of data; no official source is cited in this subchapter.

Tourism is an expanding sector in the Apuseni Mountains and in Roșia Montană as well as a top priority for national economic development. Tourism represents a viable alternative in terms of costs and benefits, as it results from recent studies, such as the **Tourism-based model of sustainable development of the Zlatna-Bucium-Roșia Montană-Baia de Arie mining area, as an alternative to the decline of extractive monoindustrial activities**, conducted by the **Institute for Research and Development in Tourism** in May 2006.

Although there are many tourists coming to Roșia Montană, the General Plan for Urbanism does not legally allow for the existence of hotels or inns. According to the **Institute for Research and Development in Tourism, the total number of tourists who visited the area in 2004 amounted to 9,828, of which 8,354 were Romanian and 1,474 were foreigners, for a total of 20,638 nights**. These data are valid for the Zlatna – Bucium - Roșia Montană – Abrud – Câmpeni - Baia de Arie area and do not quantify the number of non-

³⁴ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

³⁵ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

³⁶ P. 46.

³⁷ P. 88.

³⁸ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 67.

recorded tourists and the nights they spent outside the system of licensed hotels. The estimates of the Alburnus Maior Association amount to 15,000 tourists every year.

Given the discrepancy between the number of tourists estimated by the Alburnus Maior Association and by the RMGC, we would like to note the following. The estimates of the number of tourists were made based on consultations with the curator of the Mining Museum, who estimated that an average of 55 tourists per month visit the museum during the summer months.³⁹ This contradicts the **Study of initial conditions of the cultural heritage, Chapter 1.5.9. –Tourism today** arguing that “*in order to visit the local collection [of the Mining Museum], one has to make in advance a series of arrangements, because there are no regular public visit hours and no curator in the museum.*” This contradiction casts doubt on the estimates made by the museum curator. His statement that tourists are invited to contribute a donation in the absence of an entrance fee⁴⁰ is false. The museum has no donation fund, whereas foreign tourists pay an entrance fee of 5 to 100 RON, and Romanian tourists a fee of 3 to 5 RON. There are no accounting records for the fees paid by tourists. All the money goes to the museum curator. The fear of being charged with embezzlement may be at the origin of the estimates about the low number of tourists that the curator made. **In conclusion, the data need to be double-checked and independent monitoring of the tourists in Roşia Montană needs to be carried out, in order to correctly estimate the number of tourists who visit Roşia Montană throughout the year.**

The “Golden Way” project referenced in the **Plan for the sustainable development of the community**⁴¹ represents more than a tourist initiative. The project helps the locals get free business advice about how to set up a business in tourism, which is impossible under the current provisions of the PUG. Three information boards were set up in the area, 5,000 promotion brochures were printed and a website (www.drumulaurului.ro) was created to complement print materials. The project continues in the Bucium area, where information boards will be set up, meetings will be organized to offer business advice to the locals, brochures will be disseminated, an inn will be opened to tourists and the official site (www.buciumanii.ro) will be launched.

In conclusion, we argue that the data on tourism presented in the EIA report are inconsistent and invalid. The tourist potential of the area is significant; the fact that the locals do not capitalize on it is directly caused by the illegal character of such enterprises in the PUG, not by lack of local initiatives or lack of interest from tourists.

Fig. 1. Two of the boards for the “Golden Way” project



³⁹ Plan for the sustainable development of the community, Chapter 5.7.2 Tourism, p. 65.

⁴⁰ Plan for the sustainable development of the community, Chapter 5.7.2 Tourism, p. 65.

⁴¹ Plan for the sustainable development of the community, Chapter 5.7.2 Tourism, p. 65.

1.3.7 *“Except for the RMGC investments in the area, other investments are meager.”*⁴²

RMGC’s investments are noticeable in the Roșia Montană village, but not in Abrud and Câmpeni. The Câmpeni town has seen strong development in the past decade, which spills over into Roșia Montană, regardless of the presence of the RMGC.

1.3.8 *“Except for mining activities, there are huge disincentives for investors to invest in the area.”*⁴³

This statement is false and biased. The RMGC is the only company to have a mining license, which rules out from the very beginning any other investors in mining. As we repeatedly demonstrated, the PUG prevents any other investment in Roșia Montană.

The status of economically disadvantaged area mentioned in the **Study on the initial conditions of the cultural heritage, chapter 1.5.8.1. Regional economy**⁴⁴, was granted to the region of the Apuseni Mountains by governmental decision no. **813/07.10.2001**. The statement that *“many business that brought investments to the area went bankrupt because the area was designated an economically disadvantaged region”*⁴⁵ is false. This designation offers fiscal incentives that are meant to encourage rather than discourage investment. According to **Emergency Decree No. 24/1998** on the status of economically disadvantaged areas, the following fiscal incentives apply:

a) exemption of

- customs taxes, VAT tax on cars, machinery, installations, equipment, transportation means, imported in order to boost investment in the area;

- tax on cars, machinery, installations, equipment, transportation means, produced in Romania and purchased as part of investments in the area;

b) reimbursement of customs taxes for raw materials, spare parts, and imported parts for the purposes of local production.

c) exemption of profit taxes for the whole period in which the status of economically disadvantaged area is maintained;

d) exemption of taxes levied for changing the destination of land or removing land from the agricultural circuit for the purposes of investment.

In order to benefit from these incentives, investors have to obtain a certificate of investment issued by the regional Development Agency. The RMGC already takes advantage of these incentives based on certificate no. 99/25.04.2001.

1.3.9 *“There are better investment opportunities in other areas, such as the Câmpeni town”.*⁴⁶

The statement identifies correctly good opportunities for development in Câmpeni. These opportunities are also beneficial for the community in Roșia Montană due to the

⁴² Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

⁴³ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

⁴⁴ P. 19.

⁴⁵ P. 19.

⁴⁶ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

proximity of the two communities and of the strong links between them. However, the development of Cămpeni cannot possibly have a negative impact on Roșia Montană; the two are rather complementary, one being a village, the other one a town. Thus, they will attract different kinds of investors and of funds.

The statement that “*there is absolutely no intention to go back to the social and environmental conditions existing prior to the Roșia Montană Mining Corporation and to the Roșia Montană Project*”⁴⁷ demonstrates once again that the community is on the right development track and broke away from its past dependency on mining.

1.3.10 The SWOT Analysis

The **SWOT analysis on the socio-economic development of Roșia Montană**⁴⁸ is presented in **Table 5-11** as a conclusion to the report. The report specifies that this analysis “*does not take into consideration the Roșia Montană project itself*”. Nonetheless, the analysis contains again information that is false and biased, as well as elements that clearly factor in the existence of the RMGC project: “*transparency*”, “*contacts with new cultures from other regions in Romania and from countries of origin of the expats*”, “*risk of unjust distribution of the benefits of the project in the community*”. Here again, the EIA report is plagued by blatant lack of professionalism.

1.3.10 Conclusions to the economic characteristics

The data presented in the report are false and biased; they omit relevant information, such as changes in the PUG and the omission from the conclusions of Cămpeni, town that saw considerable development of late, with benefits for the community in Roșia Montană.

Roșia Montană is not totally dependent on mining, because there are viable development alternatives and the locals seriously consider them.

1.4. Environmental characteristics

1.4.1 “*From an environmental point of view, there are few conservation efforts underway, water resources (rivers, etc) are polluted, the habitat is fragmented, the landscape is deteriorated, and the human impact is relentless*”.⁴⁹

This statement is partly true, but it does not reflect the specificity of the Roșia Montană area. Water pollution is indeed high, but only in the industrial area, which represents a very small part of Roșia Montană, namely 95 hectares of the 4200 hectares of the village. Habitat fragmentation and landscape deterioration characterize also the 95 hectares affected by the mining industry of the Romanian state. For the remaining area, the mountain landscape has significant biodiversity that was not closely studied so far. Over 100 species of plants and protected animals are recorded in Roșia Montană. The alleged low level of conservation is contradicted by the presence of these species and by the existence of natural reserves in Roșia Montană as well as in neighboring villages (e.g. Piatra Corbului, Piatra Despiciată, Detunatele, Poiana cu narcise din Bucium)

⁴⁷ Plan for the sustainable development of the community, Chapter. 1.1 Introduction, p. 19.

⁴⁸ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 75.

⁴⁹ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

The statement about the continuous impact of the human factor is a truism, as this happens everywhere. There are few spots left, such as high peaks and the arctic region, where the human factor does not significantly affect the environment.

1.4.2 *“The activities of Roșiamin as well as the past mining activities led to the formation of acid mine water, to visible landscape deterioration and to safety problems”.*⁵⁰

Roșiamin is the partner company to Gabriel Resources in the RMGC project. The fact that Roșiamin polluted so much testifies to the low credibility of the company. In its plan to close down mines, the Romanian state accepted to be in charge of improving the environmental record of mining areas. At any rate, even now landscape deterioration on those 95 hectares is much smaller than the projected 1566 hectares to be affected by the RMGC project, a true environmental disaster.

1.4.3 *Conclusions to environmental characteristics*

The image of a polluted community is false and it harms the chances of developing economic alternatives to mining.

Existing pollution does not justify the creation of a new mining area that will be 40 times larger than the existing one.

About the author:

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Education:

Institution:	"Babeș-Bolyai" University, Faculty of Environmental Science, Department of Environmental Geography
Dates of obtainment:	4 semesters completed
Degree(s) or Diploma(s) obtained:	BA in Environmental Science to be obtained after 8 semesters

Institution:	"Babeș-Bolyai" University, Faculty of Sociology and Social Assistance, MA – Resources management and community problems in rural and urban areas
Dates of obtainment:	June 2002
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Institution:	"Babeș-Bolyai" University, Faculty of Political Science and Public Administration, Department of Journalism
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⁵⁰ Plan for the sustainable development of the community, Chapter 5: Defining the community, p. 43.

Dates of obtainment:	June 2000
Degree(s) or Diploma(s) obtained:	BA in Journalism

Employment Record

<i>Date:</i>	June 2000 -
<i>Location</i>	Romania
<i>Company</i>	
<i>Position</i>	Freelance Trainer
<i>Description</i>	Lector and trainer for several clients like the Chamber of Commerce and Industry from Cluj-Napoca, World Vision, Greenpeace CEE, Bosphorus International etc in project management, communitz development, organizational development, PR and communication, Teambuilding etc.

<i>Date:</i>	June 2005 -
<i>Location</i>	Rosia Montana
<i>Company</i>	Alburnus Maior Association
<i>Position</i>	Community developer
<i>Description</i>	Planning and implementing the development projects in Rosia Montana, training the local community for starting small bussiness initiatives, community branding etc.

<i>Date:</i>	January 2001 - January 2005
<i>Location</i>	Cluj-Napoca
<i>Company</i>	"Babeş-Bolyai" University, Faculty of Political Science and Public Administration, Department of Journalism
<i>Position</i>	Teaching Assistant
<i>Description</i>	Semiars and practical courses : Civic Journalism, Creative Writing, On-line Journalism, Internet and communication, Sociology of Media

<i>Date:</i>	January 2001 - January 2005
<i>Location</i>	Cluj-Napoca
<i>Company</i>	"Babeş-Bolyai" University, Faculty of Political Science and Public Administration, Department of Distance Learning of Journalism
<i>Position</i>	Assistant manager
<i>Description</i>	Assisting the study director to implement the strategies for distance learning department, co-ordinating the tutors

<i>Date:</i>	December 2001 – February 2006
<i>Location</i>	Cluj-Napoca
<i>Company</i>	Bosphorus Association Romania
<i>Position</i>	Executive director
<i>Description</i>	Coordinating the local, national and international programs of the organization

<i>Date:</i>	September 2002 - November 2003
<i>Location</i>	Cluj-Napoca
<i>Company</i>	Peace Action Training and Research Institute of Romania
<i>Position</i>	Researcher and Program coordinator
<i>Description</i>	Research and co-ordinating training and programmes on community development (peace education, post-war reconciliation and reconstruction, rural development in Rosia Montana)

<i>Date:</i>	January 2003 - November 2003
<i>Location</i>	Cluj-Napoca
<i>Company</i>	TRANSCEND, A Peace and Development Network
<i>Position</i>	Assistant executive

<i>Description</i>	Assisting the Transcend directors in the communication with the members and up-dating the web site
<i>Date:</i>	December 2001- September 2002
<i>Location</i>	Cluj-Napoca
<i>Company</i>	Pro Vobis National Volunteering Center
<i>Position</i>	Editor Voluntariat.ro magazine Volunteers coordinator
<i>Description</i>	Coordinating the local volunteering programmes and the montly magazine Voluntariat.ro

6. Membership of Professional Associations

Member of:

- a. Regional Center for Formation-Evaluation-Certification of Antreprenorial and Professional Competence – president and founder
- b. Center for Journalism, Communication and Social Partnership – founder
- c. Media Association for Environmental and Civic Education “Eco-Media”
- d. Association of Journalism Students
- e. D-Media

Other Training:

Institution:	Friedrich Ebert Stiftung
Dates of obtainment:	June 2006
Degree(s) or Diploma(s) obtained:	Start-up in community organizing (no diploma)

Institution:	Peace Action Training and Research Institute of Romania
Dates of obtainment:	June 2003
Degree(s) or Diploma(s) obtained:	TOT in Peace Building, Conflict Transformation and Post-War Rebuilding, Reconciliation and Resolution

Institution:	Bosporus International Network
Dates of obtainment:	February 2003
Degree(s) or Diploma(s) obtained:	TOT in Tolerance and Racism

Institution:	Points of Lights, USA
Dates of obtainment:	April 2002
Degree(s) or Diploma(s) obtained:	TOT in Co-ordinating volunteering centres

Other relevant information : very good proficiency in English, both writing and speaking, good computer and Internet skills, very good communication skills

References available upon request.