



The Association of Geological Surveys of the European Union
(EuroGeoSurveys)

in their position as

custodians to their national natural resources

and

guardians of their terrestrial environment

present their contribution

to the document drafted by DG Environment, Unit A2:

TOWARDS A EUROPEAN STRATEGY FOR THE SUSTAINABLE USE OF NATURAL
RESOURCES

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EuroGeoSurveys appreciates the document, as it defines sound basis for European policies in this field; a field essentially ignored until now.

Therefore, the observation points that EuroGeoSurveys would like to make do not contradict with any views expressed until now, but rather aim to complete the perception of Commission

Issue for consideration n°1:

The proposed scope is much related to the landfill directive, which will create discussions on waste if it is hazardous or not, if it is inert or not etc. A mining waste directive more independent from the landfill and more focused on the particular issues related to mining would give a better result. The ultimate goal of it should be to create the best possible treatment of all waste from mining.

Issue for consideration n°2:

As stated in the introduction above there would be a better approach to make a framework regulation based on BAT. It is also important to take into consideration that the tailings pond during operations frequently has a function in the treatment of water, which can be re-circulated.

Issue for consideration n°3:

Article 14 deals with existing landfill sites. The Directive should cover new plants and landfills, not existing or abandoned ones. Only in the case when the rehabilitation made or planned, does not seem to cover the safety for the future there will be a reason for reviewing the plans.

The other articles are acceptable.

Issue for consideration n°4:

This is a site-specific issue, which should not be regulated in detail.

The management of mining waste should generally be exempted from the non mixing rule. Mixing of hazardous and non-hazardous waste should be avoided if there is no particular benefit of mixing them. The examples given shows that there in certain cases are good reasons to mix wastes containing sulphides with wastes containing calcite

(e.g.. in limestones) for the buffering properties in order to avoid formation of acid drainage.

Issue for consideration n°5:

Tailings are usually transported with water as a slurry. The water also is used in the tailings ponds to cover the minerals in the tailings and protect them from oxidation. The process water usually also benefits from this procedure as it can be re-circulated and further used in the plant. This is presently the best available technology. Dry tailings would result in acid drainage if there are not enough buffering minerals available. The water cover also prevents the formation of dust in the tailings dams. Dust carried by wind is a threat to people living in the area and from an environmental point of view the dust spreads the waste over larger areas.

Thus, the disposal of liquid waste should be allowed. Research should be directed to better technology for treatment of mineral wastes and in particular to the safe management of tailings dams.

When it comes to other waste than mining waste the general advise should be not to mix. But it should be possible to utilise other wastes for mixing with mining waste if is a benefit in doing so. There could for instance be some sludge mixed with the mining waste in order to create a cover where trees could be planted etc.

Issue for consideration n°6:

If there is a directive for mining waste it will give the framework for treatment of it. Therefore mining waste should be exempted from the Landfill Directive.

Issue for consideration n°7:

How the costs are calculated in a mining operation is hardly anything to include in a directive. The costs arising for treatment of the waste are included in the operating costs. Also to costs of rehabilitation will be carried by the mining operations.

Issue for consideration n°8:

This Article 11 and Annex II should not be applied. The properties of the ores and minerals and the waste they create are included in the permitting procedure for a mineral deposit. If a permit is given the properties of the waste has been determined and it will be deposited on the site decided in the permission. Among the properties is also the potential for production of acid leachate under different conditions.

Issue for consideration n°9:

Control and monitoring procedures during various phases of a mining disposal site could be covered by the initiative. It should be based on BAT as regards details and the programme for a specific site should be dealt with in the permit.

The issue of closure with water cover should be based on BAT, including dam safety.

Issue for consideration n°10:

The annex could be used as a check list. It should be based on BAT. Details as stated in 3.2 should be avoided as this has to be given for each site under the circumstances prevailing. N°4 and probably, in some cases, n°6 are not applicable.

Issue for consideration n°11:

There should be threshold levels for additives and it should also be based on BAT. It might be a matter of balance whether to state the limits in the directive or elsewhere.

Issue for consideration n°12:

The accidents, which have happened during the last few years, show that this is an important issue. It should be included in the directive with general requirements on dams. Details should be based on BAT, which should be given an extra reinforcement from research and development work on dam safety.

Issue for consideration n°13:

Emergency storage facilities should be included in the site specific considerations as well as other emergency considerations.

Issue for consideration n°14

Inventories and restoration should be done on national level.