

| Domain | WASTE |
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| MMDD's item no. for the question which includes the observation identified by the RMGC internal code | 156 |
| MMDD's identification no. for the question which includes the observation identified by the RMGC internal code | Zlatna, 02.08.2006 |
| RMGC internal unique code | MMGA_0330 |
| Proposal | <p>The questioner makes comments with regard to EIA report, which is considered evasive, hardly presenting the waste management, paragraphs have induced message, respectively: the quicksilver is being reused, it won't be listed as waste. Also, after several lab testing, the conclusions end with grammatical constructions like: "it is likely to ..."</p> |
| Solution | <p>RMGC will strictly manage waste resulting from the mining operations in accordance with applicable regulations and a waste management structure sensitive to the environment. The Waste Management Plan (Plan B) and Section 3 of the EIA describe how – structured in response to requirements of the EU Mine Waste Directive and MO 863.</p> <p>To address the possibility that this collective concentrate of gold and silver may contain small quantities of mercury, vessels will be introduced directly in the mercury retort (with volume of 0.3 m³). Mercury will be volatilized at a temperature of maximum 650°C and taken out of the vessels with a vacuum pump. Mercury vapors will be directed to a cooling-condensing plant and a column with activated carbon. The column is filled with sulfur-impregnated carbon to catch any traces of mercury vapors left uncondensed. After recovery, any sulfur and mercury impregnated carbon will be deposited in the temporary deposit of dangerous wastes under strictly safe conditions. It will be sold as a by-product – not re-used.</p> <p>Procedures for maneuvering, storing and transport of mercury under safe conditions will be included in <i>The Emergency Preparedness and Spill Contingency Plan</i> (see <i>Plan I</i> from the ensemble of <i>Plans of environmental and social management system</i>).</p> <p>Of course, some of the information presented is necessarily based on results of laboratory testing; more detailed data can be obtained only in the operation phase. In these instances, use of a word such as "likely" indicates a fair and balanced judgment based on all available information and expert knowledge. Significant but currently unavoidable uncertainties in the assumptions and conclusions are listed in Section 8 of the Waste Management Plan, along with the cautious approach chosen in this case. Consistent with the regulations of the EU Mine Waste Directive, the Waste Management Plan will be regularly reviewed and updated – incorporating improved and more detailed information on waste streams obtained during the operation period.</p> |

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| MMDD's identification no. for the question which includes the observation identified by the RMGC internal code | Zlatna, 02.08.2006 |
| RMGC internal unique code | MMGA_0331 |
| Proposal | <p>With regard to the waste management, the questioner makes the remark that this activity is going to be subcontracted and wishes to find out which are the wastes dealt with: mining, municipal or non-hazardous wastes?</p> |
| Solution | <p>Specialized and certified companies will be subcontracted by RMGC for non-hazardous waste transport to recycling or disposal facilities. Development of RMGC own waste transport services is not envisaged.</p> <p>The waste resulted from Roşia Montană Project can be grouped into:</p> <p>a) Extractive wastes which are defined and covered by the EU <i>Mine Waste Directive</i> 2006/21/EC;</p> <p>b) Non-extractive wastes (the remaining wastes).</p> <p>Both groups can be again subdivided into (i) non-hazardous (including inert), (ii) hazardous wastes.</p> <p>In the Roşia Montană project, all waste types occur and have to be managed, for example:</p> <ul style="list-style-type: none"> • Extractive hazardous waste: tailings, stored in the tailings management facility; • Extractive non-hazardous, non-inert waste: non-acid-generating waste rock; • Extractive non-hazardous, inert waste: unpolluted topsoil and subsoil which is stored for more than 3 years; • Non-extractive hazardous waste: used oils, lead batteries; • Non-extractive inert waste: uncontaminated packaging waste. <p>Moreover, municipal waste (sludge from sewage treatment plant) and medical wastes (used syringes) will occur.</p> <p>A detailed account of all the waste types, waste classification code, amounts and respective waste management strategies for each of them is contained in the <i>Waste Management Plan</i> (Plan B) of the EIA.</p> |

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| MMDD's item no. for the question which includes the observation identified by the RMGC internal code | 3020 |
| MMDD's identification no. for the question which includes the observation identified by the RMGC internal code | No. 112893/25.08.2006 |
| RMGC internal unique code | MMGA_1303 |
| Proposal | The project generates dangerous waste |
| | <p>A <i>Waste Management Plan</i> has been developed to ensure that any hazardous waste is minimized and managed with the highest level of caution.</p> <p>Any technological process involves the use of some chemicals. Therefore, we have to deal with some hazardous waste, which will be generated in all project phases (construction, operation and closure) The <i>Waste Management Plan</i> will ensure the management of generated waste streams over the life of the mine project, in accordance with applicable Romanian regulations and EU waste directives. The <i>Waste Management Plan</i> includes guidelines regarding the preparation and maintenance of a detailed waste inventory and waste minimization plan, for each main source of waste – and a detailed process for identification, collection, sorting, storage and ultimate disposal of waste.</p> |
| Solution | <p>The <i>Waste Management Plan</i> deals with waste according to the definition of the <i>Hazardous Waste Directive</i> 1991/689/EC and the transposition into Romanian legislation (e.g. Law 426/2001) and based upon the provisions of the <i>EU Mine Waste Directive</i> 2006/21/EC.</p> <p>According to the above-mentioned legal provisions, the waste streams of the Roşia Montană Project can be grouped into two types:</p> <ul style="list-style-type: none"> • Extractive hazardous waste as defined and regulated by the <i>EU Mine Waste Directive</i> 2006/21/EC, e.g., tailings and acid-generating waste rock; • Non-extractive hazardous waste such as used oils and hazardous medical waste. <p>A detailed account of the hazardous waste streams, their physical and chemical properties and how they are minimized and managed according to the current Romanian and EU legislation can be found in the <i>Waste Management Plan</i> (Plan B).</p> |