



**MINING INFRASTRUCTURE
INVESTMENT SUPPORT
PROJECT**



MINING INFRASTRUCTURE INVESTMENT SUPPORT PROJECT

**PUBLIC CONSULTATION REPORT OF THE DRAFT
CUMULATIVE IMPACT ASSESSMENT OF BAGANUUR
COAL MINING REGION REPORT**

Ulaanbaatar

July 2019

CONTENTS

1. INTRODUCTION.....	3
2. KEY OBJECTIVES AND PHASES OF PUBLIC CONSULTATIONS	4
a. Providing Preliminary Information and Distribution of Consultation Materials	5
b. Information Disclosure Process.....	6
c. Online advertisements	8
d. Preparation of presentation.....	9
e. Feedback journal.....	9
4. THE PUBLIC CONSULTATION MEETINGS.....	9
5. POST-CONSULTATION PHASE	10
5.1 Key comments and suggestions raised by the participants.....	11
5.2 Incorporation of suggestions in The draft CIA of Baganuur coal mining region report	11

TABLE OF CONTENTS

Table 1. Information provision meeting schedule.....	6
Table 3. Consultation Package for distribution	7
Table 4. Local media channels used for advertisement of the public consultation meetings.....	8
Table 5. Consultation dates organized.....	10
Table 6. Composition of Public Consultation Meeting Organizing Team.....	10

ABBREVIATIONS

WB	World Bank
MINIS	Mining Infrastructure Investment Support Project
MET	Ministry of Environment and Tourism
PMU	Project Management Unit
NGO	Non-Governmental Organization
PC	Public Consultation
CRM	Citizens' Representative Meeting
CPM	Citizens' Public Meeting
LLC	Limited Liability Company
CIA	Cumulative Impact Assessment

1. INTRODUCTION

Coal is a particularly important energy source in Mongolia; hence, it is crucial to increase high-quality coal production capacity of the Baganuur and Shivee-Ovoo coal mines, which combined total over half of the domestic coal production. A recent assessment of both mines provides a revised estimate of 800 million tons of good quality coal compared to a previous estimate of less than 600 million tons.

The MINIS project has undertaken the task to conduct a feasibility study of the Baganuur coal mine expansion. As part of the project due to diligence and environmental and social compliance assessment associated with project financing, a cumulative impact assessment (CIA) is required to assess the contribution of the proposed Baganuur coal mine expansion to overall cumulative impacts on valued environmental and social components (VECs).

Therefore to ensure compliance with the revised Law on Environmental Impact Assessment, which was approved by the Parliament in 2012, the procedure for Strategic and Cumulative Environmental Impact approved by the Government Resolution No:374 in 2013, and the Governmental Action Plan for 2012-2016, a cumulative impact assessment of the Baganuur Coal Mine is required, under the “The Mining Infrastructure Investment Support Project” (MINIS), financed by the World Bank.

Within the context of the MINIS project, the stated goal of the cumulative impact assessment is:

“... to assess the potential cumulative impacts and risks of Baganuur coal mine over time, in the context of potential effects from other past, present and future projects and actions, and natural environmental and social external drivers on the region`s selected VECs, and to design management measures to address significant cumulative impacts on VECs selected.”¹

In accordance with the objective mentioned above, the “Cumulative Impact Assessment in Baganuur Coal Mining Region” report was prepared by a consulting company, Natural Sustainable LLC, in 2015. The report requires revision and updates to accommodate the comments and recommendations provided by stakeholders.

In order to make the revisions to the “Cumulative Impact Assessment in Baganuur Coal Mining Region” report “Greentrends” LLC was contracted by MINIS to implement the following tasks:

- Review and revise the methodological approach;
- Review and revise the scope and technical quality of the analysis and recommendations, including consolidating and re-assessing baseline data of the region, re-identifying VECs based on renewed criteria, re-defining spatial and temporal boundaries, re-assessing cumulative impacts, trends, pathways, redeveloping recommendations for mitigation measures and regional cumulative impact management and monitoring programs;

¹ Mining Infrastructure Investment Project: <http://www.minis.mn>

- Improve inclusivity, clarity, and readability of the report, including improving the structure and clarity of presentation and improving language clarity.

In accordance with World Bank's Information Disclosure and Public Consultation Guidelines and Procedure on ensuring the public involvement into Environmental Impact Assessment, draft Cumulative Impact Assessment of Baganuur coal mining region report has been disclosed and publicly consulted with related stakeholders in the regions and their comments on the CIA of Baganuur coal mining region report have been incorporated.

This report summarizes objectives of public consultations, preparation phase, providing preliminary information, distribution of consultation materials, information disclosures, consultation process, post-consultation process, consideration of comments made from participants into the draft cumulative impact assessment of Baganuur coal mining region report, key recommendations and suggestions received from participants, disclosures of results of public consultation and actions to be taken in the future.

2. KEY OBJECTIVES AND PHASES OF PUBLIC CONSULTATIONS

The objective of the consultation is to provide information on the draft Cumulative impact assessment of Baganuur coal mining region report, publicly disclose it, discuss the draft report among the related stakeholders and collect and incorporate comments, recommendations and suggestions from all stakeholders in order improve and finalize the draft report.

The public consultations were held from June 25 to June 26, 2019, among the related government, non-governmental organizations, ministries, entities, research institutions, and local citizens and herders. It was essential to ensure participation of all related stakeholders in the province, soum and districts where Baganuur coal mining region which include Governor Offices, Citizen Representative Meetings, Public Administration Divisions, Public Relations divisions, Public Service Divisions, Social Policy Divisions, Specialized Inspection Divisions, Land authority, Environmental Inspectors, Rangers, Kherlen River Basin Authority, Environmental Citizen's Councils, Thermal power stations, Research institutions, universities, and NGOs, civil society organizations and local communities and herders.

Principles on disclosure of the names of participants and the organization: All names submitted by the participants in the consultation will not be disclosed publicly, and all suggestions and recommendations will be included in the response matrix.

Principles on reflection of comments in the draft Cumulative impact assessment of Baganuur coal mining region report: The purpose of the response matrix is to demonstrate how the comments and recommendations are reflected in the CIA of Baganuur coal mining region report. It does not mean accepting all comments and recommendations and how the recommendations are addressed and the reasons why they are not accepted.

The following stages of public consultation were implemented:

1. Preparation stage,
2. Consultation announcement and Information disclosure stage,
3. Organizing public consultation meetings,

4. Evaluate and incorporate the comments/suggestions received (verbally and in written forms, by feedback journals) in The draft cumulative impact assessment of Baganuur coal mining region report and illustrate how each comment have been taken into account through the Response Matrix.
5. Prepare Public Consultation Report and relevant materials to make it available to the public.

3. PREPARATION PHASE

Preparation of the public consultations have been completed by a team composed of Tsetsgee.T, Environment and Water Management Expert of MINIS project, Altai.O, Stakeholder Engagement and Public Relations Officer of MINIS project, Bayarjargal.B, Business Development Director of Greentrends LLC and consultant team developing the draft CIA of Baganuur coal mining region report.

a. Providing Preliminary Information and Distribution of Consultation Materials

In accordance with the World Bank's Public Consultation and Information Disclosure Regulation, Procedure on ensuring the public involvement into Environmental Impact Assessment, and Consultation Plan of MINIS Project, following preparation works were undertaken with the following steps:

Step 1: Within preparation for the public consultation:

1. The MINIS PMU, the Consultant team and CIA of Baganuur coal mining region report Unit have organized several meetings and identified the scope of the consultation and the stakeholders to be engaged in the area where the plant and the gas pipes will be built which includes governmental and non-governmental organizations, local residents, herders and business entities in 5 khoros of 1 district, and 1 soum of 1 province.
2. Cumulative impact assessment of Baganuur coal mining region report, Technical and Non-Technical Summaries and other materials that are the key handouts to stakeholders have been prepared in collaboration with the MINIS PMU, the Consultant Team, and WB consultants. Other prepared materials include announcement, invitation letters, agenda, presentations, feedback form during consultation and feedback form on the organization of consultation, and feedback journals which will be placed at the Governor's Office and Soum Civil Hall for 14 days before and 14 days after the consultation meeting, material distribution forms, registration forms, posters, and frequently asked questions.
3. Meetings to provide preliminary information and deliver consultation package have been appointed by sending the detailed information concerning the intended public consultations with official letters dated June 06, 2019 with No.06a/3884 from the Environmental assessment and Audit Department of Ministry of Environment and Tourism (MET) to the Ulaanbaatar city major's office, Administration Office of Ulaanbaatar City, administrations of aforementioned 1 district and 1 soums of 1 province via email addresses of each Local Governor Offices. As a result, all meeting appointments were set by June 12, 2019. (Table 1. Schedule of Consultation Preparation)

In accordance with the pre-organized schedule, a team composed of the MINIS PMU, the Consultant team, and CIA of Baganuur coal mining region Unit have organized information provision meetings in 5 khoros of Baganuur district, Ulaanbaatar city and one soums of 1 province between June 10, 2019, and June 12, 2019. Local governors, administrations staffs, local residents, herders, and representatives from NGOs have attended the information provision meetings. During the information provision meetings, the team has made the introduction of the upcoming public consultation events, distributed printed handout and explained why it is important to be involved in the consultation meetings in order to ensure adequate participation of local people. Also, data, venue, timing, and speaker for the public consultation meetings were discussed and agreed during the information provision meetings.

Table 1. Information provision meeting schedule

Distribution location of the Public consultation materials			Dates of Material Distribution	
№	Departure	Arrival	Day	Time
1	Ulaanbaatar city	Bayandelger soum of Tuv provide	2019.06.10	10:00
2	Bayandelger soum of Tuv provide	Governor office of Baganuur district	2019.06.10	11:00
3	Governor office of Baganuur district	NGOs	2019.06.10	12:00
4	NGOs	1 st khoroo of Baganuur district	2019.06.10	13:00
5	1 st khoroo of Baganuur district	2 nd khoroo of Baganuur district	2019.06.10	14:00
6	2 nd khoroo of Baganuur district	Багануур дүүргийн 3-р хороо 3 th khoroo of Baganuur district	2019.06.10	15:00
7	3 th khoroo of Baganuur district	4 th khoroo of Baganuur district	2019.06.10	16:00
8	4 th khoroo of Baganuur district	5 th khoroo of Baganuur district	2019.06.10	17:00
9	5 th khoroo of Baganuur district	Ulaanbaatar city	2019.06.10	19:00
10	Ulaanbaatar city	Mayor's of Ulaanbaatar city	2019.06.12	14:00

b. Information Disclosure Process

Step 2: Within the framework of the announcement of the consultation and disclosure of information:

Starting from June 12, 2019, information of the public consultation meetings were placed at pre-defined locations and local government offices, local TVs, and websites. The announcements were also distributed through local television channels, newspapers, and local websites. A set of public consultation documents and announcements in Mongolian and English languages developed by the MINIS PMU and Greentrends LLC were posted at MINIS project website in 14 days prior to the public consultation meetings.

1. Within this activity, over 50 people from 1 district, one soum of 1 province were provided with information and printed handout materials were distributed to stakeholders for a considerable time before the discussions were held. As per local administration requests to provide more detailed information on the public consultation, additional meetings were organized, and consultation materials were delivered in Baganuur district of Ulaanbaatar City on January 29, 2019, and at Administration Office of Ulaanbaatar City on January 30, 2019, and.
2. Providing preliminary information to local residents have been done in collaboration with local administrative organizations, especially khoroo and bagh governors and leaders of kheseg. The below consultation materials were distributed all khoroo and bagh governors in sufficient numbers along with material distribution forms to be filled out by recipient residents. Also, during the consultation material distribution provided training on explaining the contents of the discussion materials, why people engagement were important to involve in discussions and expressed their opinions.

The consultation materials package consists of:

- ✓ Draft of CIA of Baganuur coal mining region report
- ✓ Technical summary
- ✓ Non-technical summary
- ✓ Feedback form

The consultation mentioned above materials were printed in a sufficient number of copies and placed along with feedback journals at Local Governor Offices and the Citizen's Hall. Several printed copies distributed to stakeholders and invitees include nine copies of draft CIA of Baganuur coal mining region reports, 180 copies of Technical summary, 420 copies of Non-technical summary, and eight copies Feedback journals. (For details, please see the Consultation Material Distribution Report.)

Table 2. Consultation Package for distribution

Document	Draft of Regional environmental assessment report	Technical Summary	Non-technical summary	Feedback journal
Piece	9	180	420	8

The public consultation for the draft CIA of Baganuur coal mining region report was officially announced on June 12, 2019, by posting invitation, agenda of the public consultation meetings and the set documents on the website of MINIS project in both English and Mongolian.

3. Also, announcements of the public consultation meetings were advertised to the local communities through each soum and district’s Facebook pages and local media channels. (Table 3)
4. Representatives in each soum and bag were engaged through a telephone call to ensure participation.
5. Written proposals, feedback, comments, and suggestions were received from the public during a 28-day span which includes 14 days prior to the consultation meetings and 14 days after the meetings at below addresses:
 - Website: <http://minis.mn/mn/p/сaнaл-авaх-хуудac>
 - Post address: Suite 401, Arig Center, Jamiya Gun street-10, 1st khoroo, Sukhbaatar district, Ulaanbaatar, Mongolia.
 - Telephone: +976 - 7011-2689
 - Fax: +976 - 7011-2689
 - Facebook page: <https://www.facebook.com/MinisProject/>
 - Twitter: <https://twitter.com/water47189300>
 - E-mail address: admin@minis.mn

Below table shows a list of local newspapers, TV and radio channels through which the public consultation meetings were advertised to the public.

Table 3. Local media channels used for advertisement of the public consultation meetings

Local newspapers				
№	City	Name of the newspaper	Date of publishing advertisement	
1	Ulaanbaatar	“Daily news”	2019.06.17	2019.06.21
TV channels				
№	Name of the TV channel	Start date of advertisement	Length of advertisement	Frequency
1	UBS TV of Ulaanbaatar city	2019.06.13, 20, 22, 24	4 days	2 times a day
2	Suljee 3 TV of Baganuur district	2019.06.13, 16, 19, 22, 24, 25	6 days	Every 1 hour
3	Malchin TV	2019.06 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25	5 days	2 times a day

c. Online advertisements

The announcements of public consultation meetings can be viewed at MINIS website. The announcements were also placed on key local websites of the districts, soums, and khoros and advertised through Facebook Pages and Groups for public ads and announcements (Appendix 10. Online advertisements).

d. Preparation of presentation

The presentation for public consultation meetings was prepared by the Consultant team in accordance with the recommendations of the World Bank and the MINIS project staff. The presentation developed based on the content and results of the CIA of Baganuur coal mining region report and included National and International policies, Objective of CIA, CIA steps, Cumulative impact assessment, main results of Valued Environmental and Social Component (VEC), Evaluation of the significance of CIA, Mitigation measures, and Conclusions.

The presentation was prepared as brief and precise as possible and included pictures, photos, and a table with the exclusion of technical and professional terms in order to make it simple for local audiences. (Appendix 6. Presentation)

e. Feedback journal

A set of public consultation materials and feedback journals were placed at the Governor's Office and Citizen Halls of each district and soum, as shown in Table 1. Schedule of Consultation Preparation, for 14 days prior to the public consultation meetings. These set of documents were also kept at the places above for 14 more days after the public consultation meetings to provide information to more people and help them raise additional suggestions and comments. In each public consultation meeting, the meeting speaker has officially announced to the attendants that a feedback journal is placed at Governor's office and Citizens' halls that anybody may write their additional suggestions or comments in the comment books.

4. THE PUBLIC CONSULTATION MEETINGS

The joint team of the Consultant, MINIS PMU and CIA report Unit and World Bank, has organized 2 public consultation meetings for the draft CIA of Baganuur coal mining region report in Baganuur district of Ulaanbaatar City, Bayandelger soum of Tuv province between June 25 and June 26, 2019. The joint team composition is shown in Table 5. Composition of Public Consultation Meeting Organizing Team.

At each meeting, after each incoming participant registered and handed out the set of public consultation documents, presentation on the MINIS project was first given and followed by a presentation on the draft CIA of Baganuur coal mining region report by the Consultant team. Then, the question and answer session followed up for the next 60 minutes. The next session was to receive suggestions and comments from the attendants by both verbal and written forms. Each participant was given a feedback form on which they can write their comments. The public consultation meetings ended with the participants finished expressing their verbal comments and submitted their feedback forms. The consultation meeting agenda is shown in Appendix 3. Photos taken during the consultation meetings are provided in Appendix 4.

All public consultation meetings appointments were set and agreed during consultation material distribution in each district and soum and were organized as per Table 4. Consultation dates organized.

Representatives of Governor Offices, Citizen Representative Meetings, Public Administration Divisions, Environmental agency of Ulaanbaatar city, Ulaanbaatar City development agency

Land Authority, Environmental Inspectors, Rangers of districts, province and soums as shown in Table 1. Information provision meeting schedule, Kherlen River Basin Authority, local residents and herders, actively participated in the consultation meetings.

A total of 126 people representing the afore-mentioned stakeholders have participated in the 2 public consultation meetings. Number and names of participants of each public consultation meetings are provided in Appendix 2. List of Participants.

Public consultation meeting details, including venues and dates of 2 meetings in 1 district and 1 province are shown in Table 4. Consultation dates organized.

Table 4. Consultation dates organized

№	Venue	Date and Timing	Duration	Number of attendants	Soums/districts covered
1	The freshwater resources and nature conservation center	2019. 06. 25, 14:00	3 цаг	28	Ulaanbaatar city
2	Government meeting hall of Baganuur district of Ulaanbaatar city	2019. 06. 26, 14:00	3 цаг	98	Baganuur district of Ulaanbaatar city, Bayandelger soum of Tuv province

Representatives of public consultation meeting consisted of a team of experts, scientist, and specialist who worked on CIA report. See the following table for team members.

Table 5. Composition of Public Consultation Meeting Organizing Team

Багийн бүрэлдэхүүн	
MINIS PMU	Tsetsgee.T, Environment and water specialist Altai.O, Stakeholder engagement, and Communication officer
The Consultant Team, “Greentrends” LLC	Bayarjargal.B, Project leader Anarmaa.Sh, Project expert Anu-Ujin.A, Project senior specialist Usukhbayar.G, Project specialist Dagiisuren.A, Project specialist Badam.T, Project specialist Enkhzaya.N, Project specialist Oyuntsetseg.D, Project expert Tumennast.G, Project expert

It was observed that the main questions asked by local residents were health issues, water resources, ambient air pollution, dust from Baganuur coal mine, and resettlement issues related to Baganuur coal mine expansion.

5. POST-CONSULTATION PHASE

The following tasks were performed in the post-consultation phase:

1. 8 feedback journals that were placed in 5 khoroos of 1 district and 1 soums of 1 province were collected by July 10, 2019.

2. Additional comments were collected through channels, that are indicated in Clause 5 in the **B. Information Disclosures** of this report, by June 10, 2019.
3. All comments and suggestion collected during the meetings and through all possible channels for 14 days after the consultation meetings have been integrated and reflected in the draft CIA of Baganuur coal mining region report.
4. The public consultation report was prepared with the following annexes:
 1. Appendix 1: Announcement
 2. Appendix 2: List of Participants
 3. Appendix 3: Meeting agenda
 4. Appendix 4: Photos
 5. Annex 5: Consultation minutes
 6. Appendix 6: Presentation
 7. Appendix 7: Press release
 8. Appendix 8: Response matrix
 9. Appendix 9: Newspaper announcement
 10. Appendix 10: Online announcement
5. All of the above reports and materials were submitted to the World Bank and to the MINIS Project Unit, reviewed and finalized.

5.1 Key comments and suggestions raised by the participants

- Establish a water reservoir from the Baganuur coal mine's dewatering
- Include mitigation measures to mitigate adverse impacts by increasing herder's knowledge, reducing the number of livestock, and improving the productivity of livestock.
- Assess the consequences of occupational illness in the Baganuur coal mine.
- Consideration should be given to the increased access to social infrastructure in terms of population growth.

5.2 Incorporation of suggestions in The draft CIA of Baganuur coal mining region report

As part of the main objective of the public consultation to provide information to the public and receive comments on the draft CIA, the Consultant team used the following ways to collect comments for the draft CIA:

1. Consultation meeting protocols - Audio and video recordings and written notes are made during the 2 consultation meetings, and details can be found in each meeting notes (Appendix 5. Meeting agenda).
2. Feedback forms - All participants received two types of feedback forms and were given the opportunity to submit their proposals, especially those who did not comment during the consultation meetings.

3. Feedback journals - The consultant team has placed 8 feedback journals for the draft CIA of Baganuur coal mining region report in Citizens Hall and Governors' Offices of each district, province and soum centers during the material distribution stage. The feedback journals were kept at these places for 14 days before and after the consultation meetings in order to enhance the chances of receiving more comments.

Oral and written comments and recommendations received during the consultation meetings, received proposals through 8 feedback journals from 1 district and 1 soum centers have been combined and all acceptable comments have been incorporated into the draft CIA report of the of Baganuur coal mining region and highlighted the areas and locations most voted by residents as an appendix.

A response matrix showing how all comments and recommendations were reflected in the draft CIA report is shown in Appendix 8. Response Matrix.

APPENDIX

1. Appendix 1: Announcement
2. Appendix 2: List of Participants
3. Appendix 3: Meeting agenda
4. Appendix 4: Photos
5. Appendix 5: Consultation notes
6. Appendix 6: Presentation
7. Appendix 7: Press release
8. Appendix 8: Response matrix
9. Appendix 9: Newspaper announcement
10. Appendix 10: Online announcement