



**MINING INFRASTRUCTURE  
INVESTMENT SUPPORT  
PROJECT**



**MINING INFRASTRUCTURE INVESTMENT SUPPORT PROJECT**

**PUBLIC CONSULTATION REPORT OF THE DRAFT  
CUMULATIVE IMPACT ASSESSMENT OF TAVAN TOLGOI  
COAL MINE REGION REPORT**

Ulaanbaatar, Mongolia

September 2019

## CONTENTS

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

## TABLE OF CONTENTS

Table 1. Information provision meeting schedule .....	6
Table 2. Consultation Package for distribution .....	7
Table 3. Local media channels used for advertisement of the public consultation meetings.....	7
Table 4. Consultation dates organized.....	9
Table 5. Composition of Public Consultation Meeting Organizing Team .....	9

## ABBREVIATIONS

WB	World Bank
MINIS	Mining Infrastructure Investment Support Project
MMHI	Ministry of Mining and Heavy Industry
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

The Tavan Tolgoi coal deposit is one of the main coal reserves in Mongolia. In this region, Tavan Tolgoi JSC, owned by local government, began operations in 1966 and started supplying coal for regional use; it has been exporting coal to China since 2004. Regional development has intensified since the commencement of Ukhaa Khudag mine, owned by Energy Resource LLC, in 2009. This development has triggered a massive migration and led to the unplanned concentration of population. The stress on regional environmental and social components have started to attract attention since the commencement of several projects, owned by Erdenes Tavan Tolgoi, state-owned joint-stock company, in 2011. If all these projects are implemented, they will have a negative impact on the environment and society in the region. Therefore, it is necessary to conduct a cumulative impact assessment in the region according to Mongolian legislation.

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 Tavan Tolgoi 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 Tavan Tolgoi 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.”

In order to make the revisions to the “Cumulative Impact Assessment in Tavan Tolgoi 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;
- 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 Tavan Tolgoi coal mining region report has been disclosed and publicly consulted with related stakeholders in the regions and their comments on the CIA of Tavan Tolgoi 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 Tavan Tolgoi 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 Tavan Tolgoi 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 September 25 and 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 Tavan Tolgoi coal mining region which include Governor Offices, Citizen Representative Meetings, Ministry of Mining and Heavy industry, Rangers, Galba-Oosh-Doloodoi River Basin Authority, NGOs, civil society organizations, Tsetsii development newspaper 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 Tavan Tolgoi coal mining region report:** The purpose of the response matrix is to demonstrate how the comments and recommendations are reflected in the CIA of Tavan Tolgoi 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 Tavan Tolgoi 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 Tavan Tolgoi 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 Tavan Tolgoi 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 which includes governmental and non-governmental organizations, local residents, herders and business entities in 5 soums of Umnugobi province.
2. Cumulative impact assessment of Tavan Tolgoi 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 September 07, 2019 with No.06/6169 from the Department of Environment and Natural resources management of the Ministry of Environment and Tourism (MET) to the administrations of aforementioned 5 soums of Umnugobi province via email addresses of each Local Governor Offices. As a result, all meeting appointments were set by September 25 and September 26, 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 Tavan Tolgoi coal mining region Unit have organized information provision meetings in 5 soums of Umnugobi province between September 25 and 26, 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 consultation materials			Date of distribution of consultation materials	
No	Depart	Destination	Date	Time
<b>Team 1</b>				
1	Ulaanbaatar city	Khanbogd soum of Umnugobi province	09 September 2019	09:30
2	Khanbogd soum of Umnugobi province	Khairkhan bag (Tsagaan Khad) of the Khanbogd soum, Umnugobi province	09 September 2019	12:00
3	Khairkhan bag (Tsagaan Khad) of the Khanbogd soum, Umnugobi province	Bayan-Ovoo soum of Umnugobi province	09 September 2019	15:00
<b>Team 2</b>				
4	Ulaanbaatar city	Tsogttsetsii soum of Umnugobi province	10 September 2019	09:30
5	Tsogttsetsii soum of Umnugobi province	Khankhongor soum of Umnugobi province	10 September 2019	13:00
6	Khankhongor soum of Umnugobi province	Dalanzadgad soum of Umnugobi province	10 September 2019	15:00

## b) Information Disclosure Process

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

Starting from September 09, 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 40 people from 5 soums of 1 province were provided with information and printed handout materials were distributed to stakeholders for a considerable time before the discussions were held. During the consultation material distribution team explaining the contents of discussion materials also its importance of participation of consultaion and express their views.
2. Providing preliminary information to local residents have been done in collaboration with local administrative organizations, especially bagh governors and leaders of kheseq. 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.

The consultation materials package consists of:

- Draft of CIA of Tavan Tolgoi 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 12 copies of draft CIA of Tavan Tolgoi coal mining region reports, 720 copies of Technical summary, 1680 copies of Non-technical summary, and 11 copies Feedback journals. (For details, please see the Consultation Material Distribution Report.)

*Table 2. Consultation Package for distribution*

Document	Draft of CIA report	Technical Summary	Non-technical summary	Feedback journal
Piece	12	720	1680	11

The public consultation for the draft CIA of Tavan Tolgoi coal mining region report was officially announced on September 11, 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'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/санал-авах-хуудас>
  - Post address: Suite 401, Arig Center, Jamiya Gun street-10, 1<sup>st</sup> 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](mailto:admin@minis.mn), [info@greentrends.mn](mailto:info@greentrends.mn)

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

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

№	Name of the TV channel	Start date of advertisement	Length of advertisement	Frequency
1	Gobi HD TV	2019.09.19, 21, 24	3 days	15 times a day
2	Altan gobi TV	2019.09.19, 21, 24	3 days	Every 1 hour
3	Malchin TV	2019.09.20, 21, 22, 23, 24, 25	6 days	3 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 khoroos 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 Tavan Tolgoi 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 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 3 public consultation meetings for the draft CIA of Tavan Tolgoi coal mining region report in Dalanzadgad, Tsogttsetsii, Khairkhan bag (Tsagaan Khad) of the Khanbogd soum, Umnugobi province between September 25 and 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 Tavan Tolgoi 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 soum 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 99 people representing the afore-mentioned stakeholders have participated in the 3 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 3 meetings in 1 province are shown in Table 4. Consultation dates organized.

*Table 4. Consultation dates organized*

<b>№</b>	<b>Venue</b>	<b>Date and Timing</b>	<b>Duration</b>	<b>Number of attendants</b>	<b>Soums/districts covered</b>
<b>1</b>	District Administration meeting hall	September 25, 09:00	3 hours	22	Khankhongor soum
<b>2</b>	Culture center of the soum	September 25, 15:00	3 hours	65	Bayan-Ovoo soum
<b>3</b>	Monport LLC meeting hall	September 26, 12:00	3 hours	12	Khanbogd soum

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*

<b>Team composition</b>	
<b>MINIS PMU</b>	Tsetsgee.T, Environment and water specialist
<b>The Consultant Team, “Greentrends” LLC</b>	Bayarjargal.B, Project leader Anarmaa.Sh, Project expert Anu-Ujin.A, Project senior specialist Usukhbayar.G, Project specialist Dagiisuren.A, Project specialist Enkhzaya.N, Project specialist Batbaatar.D, Project expert Ganselem.Ts, Project expert

It was observed that the main questions asked by local residents were health issues, water resources, ambient air pollution, dust from Tavan Tolgoi coal mine, and transportation issues.

## **5. POST-CONSULTATION PHASE**

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

1. 11 feedback journals that were placed in 5 soums of 1 province were collected by October 10, 2019.
2. Additional comments were collected through channels, that are indicated in Clause 5 in the B. Information Disclosures of this report, by October 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 Tavan Tolgoi coal mining region report.
4. The public consultation report was prepared with the following annexes:
  - Appendix 1: Announcement
  - Appendix 2: List of Participants
  - Appendix 3: Meeting agenda
  - Appendix 4: Photos
  - Annex 5: Consultation minutes
  - Appendix 6: Presentation
  - Appendix 7: Press release
  - Appendix 8: Response matrix
  - Appendix 9: TV announcement
  - 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**

- Reduce water consumption of coal washing plants
- Reduce dust and soil erosion resulting from coal transport
- Assess the consequences of occupational illness in the Tavan Tolgoi coal mine.
- Improve habitat, water supply and quality of citizens in Tsagaan Khad area
- Improve the health services of citizens in Tsagaan Khad area

### **5.2 Incorporation of suggestions in The draft CIA of Tavan Tolgoi 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 3 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 11 feedback journals for the draft CIA of Tavan Tolgoi 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 11 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 Tavan Tolgoi 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: TV announcement
10. Appendix 10: Online announcement