



Paramaribo, 30<sup>th</sup> August 2011

Onafhankelijkheidsplein 2  
Paramaribo Suriname  
P.O. Box 12547  
Tel: + ( 597) 520043  
( 597) 520045  
( 597) 520047  
( 597) 520048  
Fax: + ( 597) 520042  
E-mail: info@nimos.org  
nimos@sr.net  
Website: www.nimos.org  
DSB: 40.80.025 SRD  
DSB: 40.80.106 USD  
CBvS: 315.204 SRD  
RBTT: 197.12.173 EUR

Mr. P. Montoya  
Environmental & Social Responsibility Manager  
Surgold - Merian Project  
Surinamestraat 54  
Zorg & Hoop

**Ref: 11-330/GDN/ESA/md**  
**Re: Scoping Surgold Merian Project**

Dear Sir,

On August 8, 2011 NIMOS received the draft Scoping Report and Terms of Reference for the Environmental and Social Impact Assessment Study of Surgold's Merian Project in Suriname.

We have reviewed the draft document and our comments were sent via e-mail. Please find attached the hard copy.

Sincerely,  
National Institute for Environment and Development  
in Suriname

Mrs. M.L.M. Harris LLM  
General Director

Attachment:1

## **NIMOS Comments:**

### **Draft Scoping Report and Terms of Reference for the Environmental and Social Impact Assessment Study of Surgold's Merian Project in Suriname**

**Date: August 29, 2011**

#### **General Comments**

1. NIMOS needs the study plans for the specialist studies to finalize the scoping review.
2. In the ESIA report there should be a good focus on all components of the project (a.o. mining operations, processing facilities, chemicals, transport, waste management), their environmental, social and health impacts, impact significance and mitigation.
3. In the presentation of the stakeholder meetings more information is provided on the Social aspect, than what is to be read in this scoping report.
4. Please, include the results of the scoping meetings in the final scoping report and in the ESIA report.

#### **Specific Comments**

<b>Page</b>	<b>Subject</b>	<b>comment</b>
6	A new 16 km spur road will be built from the Monego-Lagatabiki road to connect the Merian Project site.	Are there alternatives for the new route? If so, what is the environmental study area.  Also a misspelling: Monego, it should be Moengo
11	The facility will include a dam across this upper creek to form a tailings reservoir. Some smaller saddle dams will also be required to contain the tailings.	7.1 Proposed studies Dams will be built around the tailing pounds. Please, elaborate on this in the ESIA. Will there be contingency plans for the dams in place? Please, provide these in the ESIA.
11	2 <sup>nd</sup> paragraph The workforce during operations is estimated to be 900 employees.	What is the estimated number of employees needed during the construction phase? Please also elaborate on that in the ESIA
12	Introduction	2 <sup>nd</sup> par.: Will the ESIA be on conventions that Suriname has signed or has ratified? Being signatory to a convention does not mean that Suriname is bound by its rule.
13	Legal Framework	4 <sup>th</sup> par.: The Ministry of Natural Resources



Page	Subject	comment
		NIMOS.
43-56	Proposed studies	Please provide NIMOS with the specific study plans for the specialist studies in order for us to get a clear understanding of how the studies will be conducted (a.o. which methodologies will be used, amount of field work, sampling locations and frequencies (where applicable)). The provide description in the Draft Scoping Report and Terms of Reference is good for the the general stakeholders and communities but sometimes too general for NIMOS to really have a discussion.
48/49/51	7.1.1.7 Environmental Specialist Study 7: Aerial Fauna Studies 7.1.1.8 Environmental Specialist Study 8: Terrestrial Fauna Studies 7.1.1.9 Environmental Specialist Study 9: Fish and Aquatic Habitat Baseline Studies	It is mentioned that survey/sampling will be done during the rainy and wet season. Will that be the both short and long rainy and dry seasons?
59-63	Table 7-1/7-4	What we notice each time in the matrices of ERM that for the Duration parameter there is always a description of the time period when it comes to the Enhancement Criteria , but never when it comes to the Severity Criteria. Why is that? Please explain how you determine in the Severity Criteria what is Short-term, Medium-Term or Long-term.
65	Project Schedule	Looking at the project schedule and seeing that the Baseline Studies will start in August, the study plans should already be available. We kindly request to provide them to NIMOS to complete our review for the scoping phase.