

**Written Presentation to the  
Standing Committee on Foreign Affairs and International Trade**

**by MiningWatch Canada/Mines Alertes Canada**

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Thank you for this opportunity to present to the Standing Committee on Foreign Affairs about mining issues in Central Asia.

I understand that the Committee is holding these hearings

- first, to assess the current situation in these regions in terms of political stability and security, economic development and transition and democratization, human rights and good governance; and
- second, to determine the best means for promoting Canadian foreign policy interests in these regions.

MiningWatch Canada takes the position that the Canadian government will best promote its foreign policy interests by ensuring that Canadian mining companies and the industries dependent upon them operate according to rigorous environmental, human rights and social standards and controls. We further assert that mining should only be subsidized by Canadian policy, goodwill and dollars where it can be shown to contribute to sustainable development in the long term in the host country. At the present this cannot be demonstrated to be the case.

#### Canadian Mining Investment in the Former Soviet Union

In their study of Canada's global position in mining, Keith Brewer and André Lemieux, wrote:

“In 1996, the larger Canadian-based mining companies, i.e. those with annual exploration budgets of at least \$4 million (US\$3 million), were expected to spend \$1.3 billion on mineral exploration in Canada and abroad. This represents almost 30%, and the dominant share, of worldwide exploration activity by the world's larger companies. Other Canadian companies, with annual exploration budgets of less than \$4 million each, were expected to spend further substantial sums on exploration in Canada and abroad.

Canadian companies have interests in over 8300 mineral properties worldwide, 3400 of which are located in 100 foreign countries... Many factors have brought about Canada's dominant position in global mining and mine finance. Decades of accumulated Canadian experience and expertise in geology, geophysics, geochemistry, engineering, mineral production, law, taxation, investment analysis, due diligence, as well as in mineral policy and other disciplines, provide the momentum. The legal framework in Canada for raising funds is conducive to risk taking, to the valuation of mineral assets, and to the buying and selling of those assets among prospectors, investors, developers and producers. Canadian legislation with respect to investment in Canada or abroad makes the tax burden on profits generated from minerals at least comparable to, if not ...less burdensome than, that in other mineral producing jurisdictions....<sup>0</sup>

Describing Canada's investment in the former Soviet Union they went on to say that: “Over the past few years, there has been a significant growth in Canadian participation in mineral opportunities afforded by countries of the Former Soviet Union.

- The larger Canadian-based companies were expected to spend at least \$45 million on exploration in the Former Soviet Union during 1996, equivalent to about 40% of the exploration activity in that region.
- In late 1996, there were over 40 Canadian companies with interests in 65 mineral properties in seven countries of the Former Soviet Union.”<sup>1</sup>

Most of this activity has been in Russia, but Canadian mineral investment in Central Asia has grown as state-owned mining properties are offered for sale under pressure from the IMF. There is continuing interest in the region from World Wide Minerals, Placer Dome, Teck, and other Canadian companies which are engaged in exploration and negotiations. In the past year, The Northern Miner has reported on the following substantive Canadian projects in the region:

Kazakhstan: Cameco – Inkai mine (uranium – seeking approval for in situ leach project) Ivanhoe – Bakyrchik (gold – on care and maintenance since 1998)

Kyrgyzstan: Cameco – Kumtor (gold – open pit); Tien-Shan Mining (gold – exploration)

Tajikistan: Nelson Gold – Jilau Mine, Taror Mine (gold)  
Marshall Minerals – Bolshoi and East Kanimansur deposits (gold – exploration)

Armenia: First Dynasty (gold – Zod and Megradzor Mines, Ararat Tailings Recovery facility)

It is difficult to obtain information about Canadian mines in Central Asia. Not only are they relatively recent, but NGOs there are under-resourced and generally unable to monitor mining projects. In none of the countries are there opportunities for civil society to oversee mining activities. What scarce information that is available from governments is not available in English. A query to Canmet and Natural Resources Canada did not elicit any recent information, neither have letters to the companies in question.

The Central Asian region is characterized by a number of problems:

- internal political instability
- severe poverty and lack of economic opportunity
- conflict between countries
- lack of a legal framework to control resource extraction
- inadequate environmental laws and regulation
- deteriorating infrastructure like roads and railways
- a weak civil society

Canadian companies are key players in the economies of two countries in the region, Armenia and the Kyrgyz Republic, and we have chosen to focus on these two companies as illustrations of the broader picture.

## Armenia

*The Canadian mining presence in Armenia highlights some serious concerns for Canadian foreign policy. The operations are only expected to last for eleven years and are will leave behind waste rock and tailings that may further pollute and damage the environment. The risks associated with the project are very high: one mine is in an earthquake zone, the other in a zone of conflict. The ore must be transported a considerable distance on existing railway infrastructure. The mine proponent has a history of irresponsible mining practices. Some voices in Armenia are concerned about the return on investment for the Armenian government and people.*

In February 1998, a joint venture between First Dynasty Mines and Armenian state mining company ArmGold opened the new \$12 million Gold Tailings Recovery Facility at Ararat in Armenia. "During the (previous) life of the Ararat treatment plant about 12 million tonnes of mineralized material were processed and deposited in a tailing containment area 5.5 km from the plant sites, 40 km south of Yerevan."<sup>2</sup> The project involves the development of a tailings recovery operation which "re-mines" tailings using a cyanide vat leach. In June 1997 the company began construction under the supervision of Kilborn SNC Lavalin. The unloading, crushing, grinding and flotation facilities of the old plant are combined with the gold recovery operation of the new plant. It can produce gold at the cost of \$220 per ounce.

The recovery operation will enable First Dynasty to re-mine the tailings of the old Ararat plant and to open Zod and Megradzor Mines and re-mine their tailings. "Access to the (Ararat) site (from Yereva) is by the main Yerevan-Nakhichvan tarred road and the main railway spur which supplies the Ararat process plant."<sup>3</sup>

Zod is situated in eastern Armenia, northeast of Lake Sevan at an altitude of about 2200 meters. The distance between Zod and the processing facility by railroad is about 235 km. Mining at Zod started in 1976 through open pit and underground, and it was placed on standby in 1997. "Zod holds gold reserves estimated at about 5 million ounces, but also lies within striking distance of the countries contested border with Azerbaijan."<sup>4</sup> "There is civil unrest in parts of the Armenian frontier and border disputes over territories in regions adjacent to Azerbaijan , any or all of which may hamper and preclude the ability of FDMAL to carry out its project activities in areas affected, particularly in the area around the Zod mine which is close to a zone which has, in the past, been the subject of hostilities between Armenia and Azerbaijan."<sup>5</sup>

Megradzor is in the Hrazdon district about 50 km north of Yerevan and 18 km northwest of Hradan. The railroad to the Ararat facility is 110 km. The mine was underground and placed on standby in 1997. The existing railroad will transport ore to the Ararat facility, and the Armenian government will pay a penalty if railroad delays interrupt production.<sup>6</sup> Megradzor is close to the site of a disastrous earthquake. "Armenia is a mountainous country characterized by a great variety of scenery and geological instability. The average altitude is 5,900 feet above sea level. There are no

lowlands...Armenia is subject to damaging earthquakes. On December 7, 1988, an earthquake destroyed the northwestern town of Spitak and caused severe damage to Leninakan (now Gyumri)...about 25,000 people were killed.”<sup>7</sup>

The company has recently added new capacity at the Ararat gold recovery project to increase production from 30,000 to 80,000 troy ounces or 2.49 tonnes of gold per year.<sup>8</sup> The expansion involved re-starting the Zod open-cut mine to produce 500,000 t of ore per year.<sup>9</sup> New production will be processed simultaneously with reclaimed tailings. According to First Dynasty’s Annual Information Form, total project life of these mines is 11 years<sup>10</sup>

An Environmental Impact Statement was prepared in 1998 for the Zod and Megradzor mines. An Environmental Management Program is to be maintained throughout the life of the operation and after site closure. These are old mine sites, and there are already serious environmental problems to cope with “suspended solids and hydrocarbon contamination of surface waters has been detected at the mine sites and also arsenic contamination in surface waters at Zod and Ararat...specific issues that may have an impact on the feasibility of the project include acid rock drainage, and surface and ground water pollutants and rehabilitation”<sup>11</sup>. In Canada, a concrete plan for cleanup of existing contamination would be required before a new facility would be approved, but in Armenia the company states “site closure plans will be developed and regularly updated as part of the site EMS.”<sup>12</sup> Ararat is in the middle of an agricultural area where grapes and fruit are grown.

It is particularly disturbing to note the risks inherent in these projects, when we look at the history of the project proponent. First Dynasty Mines is owned 43% by Sterlite Industries and 45% by Robert Friedland through different companies. First Dynasty’s other operations are in Indonesia, Burma and Yukon. The company is registered in the Yukon and on the TSE. Friedland is known in mining circles as “Toxic Bob” for his role through a number of different companies in a series of mining disasters: leaking cyanide from Galactic Resources destroyed the Alamosa River in Colorado between 1987 and 1990; Golden Star Resources was a partner in the Omai disaster in Guayana in 1995; Vengold was driven out of the Bolivar area of Venezuela by local people for destructive exploration practices; Ivanhoe Mines (Indochina Goldfields) in the Monywa area of Burma has destroyed the environment and is reputed to use forced labour;<sup>13</sup> Vengold in Lihir in Papua New Guinea is dumping 4600 tonnes of waste rock an hour 1.5 kilometres off the coast into an area with some of the highest marine diversity in the world.<sup>14</sup>

“The European Bank for Reconstruction and Development has refused to extend a \$35 million loan to Canada’s First Dynasty Mines for the expansion of gold mining in Armenia due to the high risks involved in the project. ‘The First Dynasty project does not meet the bank’s criteria and entails a combination of risks that exceed the risk level acceptable to the EBRD,’ Alkis Drakinos, the EBRD’s representative in Armenia told Interfax.”<sup>15</sup>

Armenia has inherited a tremendous amount of wealth and resources, yet it is one of the poorest countries in the world with one of the lowest per capita incomes. In 1995, infant mortality was 20 per 1000. There is serious question whether selling the mines to private interests will do anything to ameliorate the situation. In March 1999, SNARK, the Armenian news agency reported “Neither government agency or official shall be allowed to require information on the course of works at the Armenian-Canadian gold mining plant *Ararat*. This provision is included in the agreement between the Armenian Industry and Trade Ministry, the state-owned Armgold company and Canada’s First Dynasty Mines signed on June 24, 1998. The information was reported to SNARK by Boris Mekercian, the head of mining and metallurgy department in the Industry and Trade Ministry...According to the agreement, only the ArmGold company — a co-founder from the Armenian side — has access to the information on economic activity of this JV.”<sup>16</sup> First Dynasty Mines gets 70% of the profits for the first three years, and equally thereafter.<sup>17</sup>

Armenian Industry and Trade minister Garnik Nangulyan also criticized a contract signed with US-Canadian First Dynasty Mines company on the exploitation of Armenian gold fields. SNARK news agency reported, that “he told journalists on the 20th June 1999 that the interests of the Armenian side had not been defended sufficiently in the contract...Armenian experts believe the distribution of profits is the most vexed issue. Under the contract the foreign investor gets 70% of the profits and the rest goes to the Armenian side. Moreover the contract underestimates the percentage of gold, silver and other components in the residue as well as undervaluing the quality of the precious metals.”<sup>18</sup>

“Armenia’s policy toward international trade is quite liberal; there are not significant quantitative restrictions on trade, no taxes on exports and a simple two-band tariff (zero % and 10%) exists on imports. International trade licences are required only in the areas of health, environment and security ...Restrictions on international trade and private capital flows were removed and policies were adapted to encourage inflows of Foreign Direct Investment and Portfolio Investment.”<sup>19</sup>

“At March 31, 1999, the company had 250 full time employees and 360 personnel who were former employees of ArmGold and are held on standby by payment of a nominal retainer. ArmGold, the tailings contractor, employs 100 full-time personnel at Ararat.”<sup>20</sup> A study of the joint venture agreements with the Armenian government, indicate that the company will enjoy a two year tax holiday and eight years of preferred tax rates afterwards. If later business plans for Zod and Megradzor development were not acceptable to the Armenian government, the company would be compensated for its expenses.<sup>21</sup> These mines are expected to have a life of eleven years. How much of the wealth produced by the mines in Armenia will remain there?

### Kyrgyzstan

*The Kumtor Mine in Kyrgyzstan produces 6% of the GDP of that country. This is a gold mine in a glacier which has already left 16 million tonnes of toxic waste sand*

*and tailings sitting near the top of a mountain, where the waters feed into a cross-boundary river. The mine is serviced by a road where there have already been three toxic spills. The ability of the Kyrgyz government to monitor mining practices and enforce laws may be compromised by their part ownership of the mine. Although the mine employs almost 1500 people, it's long term contribution to sustainable development in the region remains to be established.*

In 1992, Cameco entered into an agreement with the Kyrgyz Republic to evaluate the Kumtor gold project.<sup>22</sup> The Kumtor Mine in Kyrgyzstan is owned by the Kumtor Gold Company, owned one third by Cameco and two-thirds by the Kyrgyz State Property Fund. It came into production in 1997 at a cost of \$450 million US.<sup>23</sup> Cameco is the operator of this mine, with “some of the lowest operating costs boasted by any gold project in the world”<sup>24</sup> — at \$174 per ounce to produce against a world average of \$220. In 1999 Cameco produced 610,500 ounces of gold,<sup>25</sup> and is expected to increase production up to 700,000 in 2001.

This is a mine made possible by cyanide technologies that make extremely low-grade ore viable.<sup>26</sup> “Deposits are graded at 3.58 grams of gold a tonne of ore, meaning that ‘miners must sift through a tonne of rock to get half a thimbleful of gold’” said Kumtor president Len Homeniuk.<sup>27</sup> This leaves the rest as waste.

“Reaching Kumtor from Kyrgyzstan’s capital Bishkek entails a one-and-a-half hour ride in a twin prop plane. The mine is on a windswept peak 4,400 metres above sea-level...”<sup>28</sup> Geoffrey York of the Globe and Mail wrote a lengthy article in June 1998 about the difficulty of creating this mine: “A former sheep trail was converted into a road to the mine, but it required 38 switchbacks to climb the steep mountain. ...Everyday Kumtor’s mills consume 11 tonnes of steel grinding balls imported at great costs from China and Russia. Equipment and supplies must be trucked up the treacherous mountain road. To reach the gold ore, Kumtor has to blast through permafrost and a glacier. ‘We’re basically taking the top off the mountain’, said Peter Townsend, senior vice-president... Kumtor keeps 60 security staff among the 1300 mine workers on its payroll.”<sup>29</sup>

The road up the mountain has been exacting its toll. There have been two more reported spills of toxic materials on the road since the much publicized cyanide spill of May 20, 1998. One on January 20, 2000, when 1500 kgs of ammonium nitrate ended up on the side of a road near Barskoon after a semi-trailer lost the pin mechanism attaching the load to the truck, and July 22, 1998 when 70 litres of nitric acid were spilled .<sup>30</sup>

The May 20, 1998 spill was studied by a committee of international experts, headed up by Canada’s Canmet. They presented their report to the Kyrgyz government in Sept 11, 1998, and released their findings to the public two weeks later. The report found that there were few side-effects from the cyanide spill of May 20, 1998.<sup>31</sup> A separate commission established by the prime minister of Kyrgyzstan determined that “the damage sustained to the environment, agriculture, health and tourist organizations

with recreational facilities at Lake Issuk Kul amounted to approximately \$4.6 million US.”<sup>32</sup> The Canmet report has been challenged by a number of experts and NGOs<sup>33</sup> and is distrusted by the many Kyrgyz people who were hospitalized and ill following the spill. Earlier Health Ministry officials said 2533 people had been poisoned and at least two had died from cyanide poisoning.<sup>34</sup> “Before and after the spill, livestock and other animals in the region had been dying. About 100 birds mysteriously died in one place, about 80 kilometres away.”<sup>35</sup> Environmental groups in Kyrgyzstan, and elsewhere have been calling for an independent audit of the company’s entire operations, and the public disclosure of its emergency response plan.<sup>36</sup> They say that the study was only of the first spill, and only looked for ‘general’ and ‘total’ cyanide; thiocyanates were not included in the research, nor were chemicals used to treat the spill, which are toxic in their own right.<sup>37</sup> In 1998, the company organized its own Kumtor Community Liaison Committee in the region,<sup>38</sup> in an attempt to avoid a repeat of the public relations problems occasioned by the first spill.

Many other problems and errors in judgement plagued the Cameco start-up. Cameco was introduced to the Kyrgyz government by Boris Birshstein, a businessman from the former Soviet Union, who became involved in corruption scandal that triggered the resignation of the entire Kyrgyz cabinet in 1993.<sup>39</sup> In 1995, 15 people died in a helicopter crash.<sup>40</sup> The original start-up cost was estimated at \$361 million and instead came in at \$452 million. The power line alone cost \$38 million.<sup>41</sup> Despite its low production costs, the mine is making a profit only because of hedge contracts, said president Len Homeniuk in 1998. “The company is still assessing whether the other sites are worth the financial risks, including the danger of accidents such as cyanide spills, he said “these things are a major risk in this part of the world.”<sup>42</sup>

“All these problems raise questions about the dangers posed by the project to the fragile economy of the Tien Shan region. There is a need to monitor whether effluents and dust are carried down to the glaciers, which are a water sources for most of Kyrgyzstan,” said Anantoly Deekikh, Professor of Geography with the Kyrgyzstan Academy of Sciences.<sup>43</sup> Since the Kyrgyz government is part owner of the mine there is little incentive for them to be assertive in enforcing any form of environmental regulation. “As far as I could tell from my classes ( in Kyrgyzstan) last November, most of the regulators and NGOs do not have the technical capability, funds, etc. to actually oversee what the mine is doing.”<sup>44</sup> Although Kumtor claims it is committed to following Saskatchewan environmental practices, they operate the mine with a reclamation bond that does not meet the costs of cleanup, no public disclosure of their emergency response plan, and no meaningful public input on environmental issues. Says Natalia Ablova, director of the Bureau of Human Rights in Bishkek: “When we ask to see the emergency response plan, we are told that the information cannot be released to us. ..the lack of full transparency creates distrust among the local population.”<sup>45</sup>

The mine tailings are in a surface tailings basin in a river valley with a synthetic liner and an earth-filled dam.<sup>46</sup> The dam is constructed on permafrost. “Stored behind the dam are 16 million cubic metres of tailings sands and process water. A series of canals and diversions prevent run off and natural water courses from entering the tailings



basin.”<sup>47</sup> The reclamation plan states that the mine will be returned to its former use. A reclamation trust fund has been established at \$14.9 million US, but contributions to the fund are made based on units of production over the life of the mine. The balance at December 31, 1999 was only \$2.4 million US.<sup>48</sup> Experience shows that this is an inadequate amount to cover the actual costs of reclaiming and decommissioning such a mine, and that not requiring the full bond up front, can leave the public with the costs of clean-up and the perpetual care and maintenance that such a mine requires.<sup>49</sup> What is the acid mine drainage potential? The effects of blown toxic dusts? Cyanide decomposes more slowly at cold temperatures, What are the provisions for an accident? How will the wastes be monitored and managed once the company leaves Kyrgyzstan?

There is reason to be concerned about the environmental impacts of mining through a glacier, and the impacts that will have on water drainage from the mountain. Most of the waters from the mine flow into Syr Danya, an international river which later flows from Kyrgyzstan into Uzbekistan — ‘a potentially explosive situation if the river were to become contaminated’<sup>50</sup>. How are environmental and safety agreements enforced in a country as poor as Kyrgyzstan? Says Cameco President Len Homeniuk , “We focused on Kyrgyzstan because it is a much better country to do business in (than Uzbekistan). This is a big project in a small country which gives us a degree of comfort...we are a big fish in a small pond.”<sup>51</sup>

In October, fighting broke out in the Barken district of southern Kyrgyzstan. According to the company, this “has not affected operations at the Kumtor gold mine...Security issues have been the number one priority of the company, said Tynara Shailydayeva, external relations manager at the Kumtor Operating Company.”<sup>52</sup>

Cameco is enjoying a five year tax holiday until the end in 2002, so until that time the Kyrgyz government does not get much return for their investment. Loans and political risk insurance were provided by EDC, IFC and EBRD for the project.

## Conclusions

We are concerned that Canada not contribute to the looting of resources in countries such as Armenia and Kyrgyzstan, through mines of short duration with inequitable tax regimes. If Canada is going to contribute to the development of sustainable economies, we would be wise to question gold as that investment. Gold is increasingly under scrutiny as a feasible driver for the economy.<sup>53</sup> Writes John Young: “Central banks and international financial institutions hold more than 34,000 tons of gold. This is more than 13 times the annual production of the world’s mines; if sold these reserves could satisfy gold demand for more than 8 years (current demand is approximately 4,000 tons per year). Of this demand, 85% is typically used for jewelry.”<sup>54</sup> Young argues that the gold is slowly being converted from precious metal to base metal, and that it has been steadily losing value for decades.

Canada cannot afford to be involved in a mine disaster like the Esmeralda spill on the Tisza River. The information available to the Canadian public and government

about these mining operations is selective and limited. It is clear that more information about the operations of Canadian companies operating abroad is essential if Canada is to ensure its reputation. The Canadian Environmental Assessment Act and its public participation provisions must be applied to investments overseas. In countries where regulation and enforcement of environmental standards are weak or non-existent, Canada needs to hold companies registered in Canada accountable to the highest Canadian standards, and to assist host governments (where requested) in developing strong environmental legislation and enforcement.

If the purpose of the Standing Committee study is indeed to “advance Canada’s foreign policy interests in the South Caucasus and Central Asia”, then we need to ensure that the environment of these countries is protected and improved for future generations to enjoy, and that the mining we do support does not, in the long term, contribute to poverty and future liabilities.

As David Suzuki writes in From Naked Ape to Superspecies:

“In countries that either cannot or will not protect their citizens, corporations will be tempted to ignore every precept of morality. Unregulated business drive to maximize profit may simply not take responsibility for protecting people and nature. We operate under a system that talks about spreading wealth and helping the poor, and that encourages one model of development to do so. But that same system is encouraged, even forced to find every possible loophole, every imaginable shortcut, every devious way to save money in order to return larger profits. In countries that for whatever reasons do not protect labour or the environment and do not impose stringent health standards, corporate logic encourages private enterprises to take advantage of the situation, and to fight any upgrading of standards that will hurt the lush and unfettered bottom line”.<sup>55</sup>

## **Endnotes**

<sup>0</sup> Brewer, Keith and Lemieux, André. Canada’s Global Position in Mining, May7-9, 1998

<sup>1</sup> op cit.

<sup>2</sup> 1999 First Dynasty Mines Annual Information Form

<sup>3</sup> op cit.

<sup>4</sup> Hoover Company Capsules 6/06/99

<sup>5</sup> 1999 First Dynasty Annual Information Return

<sup>6</sup> First Dynasty Annual Information Form 1999

<sup>7</sup> Canadian Foreign Service Institute

<sup>8</sup> Interfax News Agency 3/12/99

<sup>9</sup> BBC monitoring Service 15/10/99

<sup>10</sup> 1999 First Dynasty Annual Information Return

<sup>11</sup> First Dynasty Annual Information Return 1999

<sup>12</sup> ibid.

<sup>13</sup> testimony of anonymous refugee from Burma, February 2000 “the region now smells like toilet bowl cleaner...the concentrate has turned the ground black in the area surrounding the No. 1 copper project and the destroyed farmland is a green/blue colour

<sup>14</sup> Chatarjee. Pratap. A Profile of Robert Martin Friedland, September 3, 1998, Project Underground

<sup>15</sup> Interfax News Service 23/04/99

<sup>16</sup> SNARK 22/003/1999

<sup>17</sup> BBC Monitoring Service10/07/98

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- <sup>18</sup> BBC Monitoring Service 26/06/98
- <sup>19</sup> Peace Stability and Economic Growth, The Embassy of the Republic of Armenia, 1999, p.8
- <sup>20</sup> 1999 First Dynasty Annual Information Return
- <sup>21</sup> *ibid*
- <sup>22</sup> Cameco is also 50% owner of the Tien-Shan Gold Company in the Dzhahalal-Abad area of the country.
- <sup>23</sup> 1999 Cameco Annual Information Return
- <sup>24</sup> Reuters News Service 16/07/99
- <sup>25</sup> 1999 Cameco Annual Information Return
- <sup>26</sup> *ibid*, p.33
- <sup>27</sup> quoted in Reuters 16/07/99
- <sup>28</sup> Rao, Sujato, Reuters News Agency 16/07/99
- <sup>29</sup> York, Geoffrey Globe and Mail 30/06/98
- <sup>30</sup> ENS 07/02/00 “Chemical Spill at Central Asian Gold Mine prompts Audit demand”
- <sup>31</sup> report available on Cameco website
- <sup>32</sup> 1999 Cameco Annual Information Return
- <sup>33</sup> Robert Moran Ph.D. Cyanide Uncertainties, Mineral Policy Centre, 1999, Jozsef Feiler, CEE Bankwatch in Budapest:
- <sup>34</sup> Reuters News Service 5/07/98
- <sup>35</sup> Geoffrey York Globe and Mail June 19, 1998
- <sup>36</sup> Jozsef Feiler of CEE Bankwatch in Budapest: “Kumtor Operating Company continues its record of bad environmental house-keeping practices. This is a dangerous situation that has harmed the local people and the Kyrgyz economy.” Press Release February 1, 2000 from Mineral Policy Centre. Mr. Feiler can be contacted at 36.1.216.7297
- <sup>37</sup> Cyanide Uncertainties by Robert Moran Ph.D. 1998 MPC; Natalia Ablova, director of the Bureau of Human Rights and the Rule of Law, Bishkek . Ms. Ablova can be contacted at 966.312.211974
- <sup>38</sup> 1999 Cameco Annual Information Return p.38
- <sup>39</sup> Geoffrey York, *op cit*.
- <sup>40</sup> Responsibility for this crash — which included 9 Canadians is now before the courts.
- <sup>41</sup> *ibid*
- <sup>42</sup> *ibid*.
- <sup>43</sup> Reuters News Service, 16/07/99.
- <sup>44</sup> R. Moran 1 Mar 2000, personal communication
- <sup>45</sup> Ablova, N. quoted in press release, Feb 1, 2000, Mineral Policy Centre
- <sup>46</sup> Cameco website — annual report 1999
- <sup>47</sup> 1999 Cameco Annual Information Return, p33
- <sup>48</sup> *ibid*
- <sup>49</sup> see Kuipers, J. and Carlson, C., Hardrock Reclamation Bonding Practices in the Western United States, National Wildlife Federation, February 2000
- <sup>50</sup> Robert Moran, personal communication February 22, 2000
- <sup>51</sup> Reuters News Service 16/07/99
- <sup>52</sup> Interfax News Agency 01/10/1999
- <sup>53</sup> Young, John E. Gold at What Price? The need for a public debate on the fate of national gold reserves, Mineral Policy Centre , February 2000.
- <sup>54</sup> *Ibid*, p 5.
- <sup>55</sup> Suzuki, David and Dressel, Holly, From Naked Ape to Superspecies, Toronto, Stoddart, 1999. P 228