KOIDU HOLDING’S ENVIRONMENTAL IMPACT ASSESSMENT

Environmental Impact Assessments by law are suppose to be public documents, which should be discussed by all stakeholders to ensure that all interests in the assessment are taken on board and mitigation measures are not only recognized but implemented.

The Environmental Protection Act (EPA) 2000 states clearly in section 19 (1,2,3) that
1. The Director shall after receiving an environmental impact assessment; circulate it to professional bodies or associations, Government Ministries and Non-governmental organisations for their comments.
2. Without prejudice to sub section (1), the Director shall make an environmental impact assessment open for public inspection and comments and he shall given notice to that effect in two consecutive issues of the Gazette and two issues in a newspaper; except that in the case of a newspaper there shall be an interval of at least seven days between the first and second publications.
3. Comments made under this section shall be submitted within 14 days of the last publication in the Gazette or newspaper as the case maybe, to the Director.

Green Scenery is an organisation that seeks the interest of Sierra Leone’s environment and those whose lives are affected by it, thus it falls in the category of NGOs as stated in 1 above.

Green Scenery wishes to express that since the newspaper publication regarding the Koidu Holdings Limited Environmental Impact assessment (EIA) in late January the organisation have done everything it could to:

a. Download from the published website the Environmental Impact Assessment (EIA) with no success because the information is still not there.
b. Acquire a copy from the Government Bookshop from which all publications from government are sold. The bookshop unfortunately has not got a copy of the EIA
c. Secure a copy from any of the following public sector 1. Fourah Bay College Geological Department 2. Government Geological Department. 3. Sierra Leone Library Board and we are yet to get a copy from the Director of Environment as stipulated in section 19(1) of the EPA 2000.

Green Scenery is concerned that the Environmental Impact Assessment report is been shrouded in secrecy, confined only to the Mining Company, Koidu Holdings Limited and their consultant CEMMAT. These companies can only allow inspection of the document giving little room for a comprehensive study of the report and hence a proper feedback to the appropriate government authorities.

We are worried that there could exist inimical clauses bordering on the interest and survival of local communities within the would-be operation zone of Koidu Holding Limited (KHL). These clauses are very likely to impact on the human rights of the people as protected by our national constitution as well as other international treaties signed by Sierra Leone.
We are worried that keeping this vital document from the reach of professional bodies and other interested parties completely breaches the World Bank disclosure policy and the EPA 2000 and prevents positive input from these bodies.

Green Scenery is very concerned that Koidu Holding Limited (KHL) is involved in active mining operations although the EPA 2000 states abundantly in section 20(1) (2 a,b,c) conditions under which licences shall be granted for such projects. Green Scenery believes those conditions have not been fulfilled especially that which has to do with the submission of comments, which comment are to be forwarded by the Director of Environment to the National Environmental Protection Board (NEPB).

The fact that allocated time requested for the submission of comments falls short of World Bank requirement, coupled with the unavailability of the EIA to the public especially the communities immediately affected by KHL’s operations requires that the KHL’s operations be on hold until all irregularities are normalized.

Concerned therefore about the environmental degradation of the operational area of KHL and the human rights ramifications such operations would cause in future we in Green Scenery are requesting:

1. That procedures stipulated in the EPA 2000 be followed which allows for the EIA to be circulated among professional bodies and NGOs interested in such sector.

2. That the time frame be extended to six weeks as required by the World Bank Disclosure Policy. This extension should start when the document have reached at least two key organisations.

3. That the Department of the Environment and KHL facilitate a process where affected communities will access and input into the report.

4. That Koidu Holdings Limited put a hold on its operations until the EIA report is fully digested within the time frame by all stakeholders of the project.

Green Scenery fears that if these measures are not taken, it will lead to an unpleasant recipe, with an outcome that will be detrimental to all parties.

For further information, contact;

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