

Forestry Department

COPY

Ref # ASO/0305-01

January 5, 2021

FORESTRY DEPARTMENT

Mr. Peter Knight, CD, JP
Chief Executive Officer /Government Town Planner
National Environment & Planning Agency
10 Caledonia Avenue
Kingston 5

Dear Mr. Knight

Re: Universal Application # 2018-07017-EIA00196
Type: Environmental Impact Assessment
Application concerning Noranda Jamaica Bauxite Partners II

The Forestry Department (the Agency) acknowledges receipt of your correspondence dated November 19, 2020 along with the attachments relating to the Special Mining Lease application from Noranda Jamaica Bauxite Partners (NJB). Having reviewed the EIA the Agency offers the following comments relating to the captioned matter:

1. Haul Roads

- a.** NJB must adhere to its commitment to reduce road width where possible and to actively implement dust suppression measures as outlined in the Environmental Impact Assessment (EIA).
- b.** The NJB must throughout the life of the mining activity exercise active management of the haul roads so as to prevent their use by unauthorized people in order to minimize the potential for their use to facilitate squatting and/or illegal exploitation of the forested areas for timber, forest products or wildlife and the further degradation of the remaining forests in these areas.
- c.** Recognizing that the proposed mining activities will come in close proximity to the proposed area for protection of the cockpit country, the Agency recommends that at the end of the mining activity, the surface of the haul roads must be broken up to facilitate the sponateous re-generation and active re-forestation of the roadways. This will allow for the restoration of ecological corridors between the hillocks of the mined areas (reduced fragmentation), the reduction of the degradation potential and an increase in areas available for restorative planting of tree species.

- d. Where it has been determined that haul roads must be left open at the end of mining, active and appropriate measures must be put in place to limit any ensuing access to the remaining forested areas.
- e. It is critical that every effort is made by the relevant Authorities (JBI and NEPA) to mandate and ensure that NJB is held accountable for the road closure at the end of mining.

2. **Bauxite Deposits**

The Government has guaranteed that there will be no exploitation of any deposits found within the protected areas (forest reserves, and JNHT sites), as such it is anticipated that there will be a need to improve/enhance the capacity of the Agency to conduct additional monitoring of the mining activities undertaken by NJB to ensure that they do not infringe on the forest reserves. To support this additional monitoring activity, the Agency recommends that a special administrative charge should be applied to the NJB permit and this should be deployed to support the Agencies so affected.

3. **No Net Loss Policy**

The Agency takes this opportunity to strenuously remind all concerned that every effort must be made to adhere to the “No Net Loss” of forest cover outlined in the Forest Policy for Jamaica (2017). Consequently, there is to be a requirement that NJB must reforest an equivalent area of forest cover lost due to the entire mining and rehabilitation process. This must be subject to the following: -

1. A thorough assessment of the amount of forest cover to be impacted and hence the percentage loss (forest) to the country.
2. Clear plans and active phased replacement of the lost tree cover by NJB within a requirement for total replacement within a stipulated timeline.
3. The responsibility for this replanting will lie solely with NJB, though the Agency will monitor and assess the activity overtime.
4. The satisfactory achievement of the “no net loss” as stipulated by policy will be at the sole discretion of the Agency.

5. **Biodiversity of the Area (Flora)**

While the endemic trees/bromeliads and vines identified in SML 173 are not locally endemic, the NEPA and NJB are encouraged to conserve and use these species in the restoration programme. Specifically, it is recommended that as many as possible of the native trees identified be included in these restoration efforts and that NJB be required to use a modern and progressive restoration approach in the decommissioning of mined-out pits from simply grassed areas to a state where trees/forests can be re-established.

6. **Forest cover establishment**

- a. Recognizing the significant impact on total national forest cover that mining activities can have, the establishment of tree cover at the end of the project must be mandated to include areas that may have been flat grassed areas (not under forest cover) at the beginning of the mining activity.

- b. Recognizing the inherent challenges with the reclamation/rehabilitation of the mined out pits, it is recommended that where possible the rehabilitation is to include reforestation with a portion being done within the pits and a portion in more suitable areas, where available, to increase the survivability and hence impact on national forest cover statistics.
- c. The Agency challenges the veracity of the claim that trees do not grow in the areas with bauxite deposits as the land has "aluminum iron toxicity" and requests any evidence that could support such a statement. The inherent fallacy of this statement is however recognized as any observation/assessment of any undisturbed section of bauxite bearing areas e.g. Cockpit Country demonstrates that this statement has no merit.
- d. It is imperative that the permit issued mandates not only that replanting be done, but also a clear requirement that they be maintained as needed to ensure that there is survival of the seedlings up to 5 years after planting

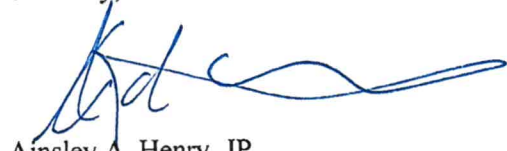
7. **Reshaping of pits and the impact on forested hillocks.**

NEPA must also ensure that any permit granted:

- a. Establishes clear standards for a maximum amount of land that can be shaved off the adjoining hillocks in order to rehabilitate/restore the mined-out areas as well as to ensure the stability of slopes created thereby reducing the likelihood of land slippage in future.
- b. Ensure that tree establishment activities are included among the measures for achieving certification of the mined-out pits.
- c. Facilitate the inclusion of the FD in the process from the onset of the mining activity in support of the needed research to guide mining operations in the future.

Recognizing that the removal of high value species/areas with replanting in other areas and attempts to re-establish forest cover does not guarantee the quality or integrity of any resultant reforested area, the Agency can not in principle support any activity that holds the potential to adversely impact the no net loss policy. The Agency therefore encourages that every effort be made to maintain the connectivity and the ecology of the impacted areas, so as to reduce the impacts of fragmentation and degradation of those areas and that all of the recommendations outline herein are incorporated and adhered to in a bid to minimize the longterm impact on total national forest cover.

Sincerely,



Ainsley A. Henry, JP
CEO & Conservator of Forests