

Requests for Inspection 18/02 and 18/03

(This English translation has been provided by the Requesters. The original Requests for Inspection in Mongolian/Russian are kept with the Panel)

TO: Gonzalo Castro dela Mata, Chairman, WBG the Inspection Panel

Via Electronic Mail ipanel@worldbank.org
1818 H Street NW, MSN 10 1007
Washington, DC 20433
USA

REQUEST FOR INSPECTION OF MINING INFRASTRUCTURE INVESTMENT SUPPORT (MINIS) PROJECT IN MONGOLIA

Oyu Tolgoi Watch, [REDACTED] and local community members of Baganuur District (Ulaanbaatar) and Gurvantes soum (Umnugobi aimag) are submitting [REDACTED] separate Requests for Inspection on Component 1 and Component 3 of the Mining Infrastructure Investment Support Project (MINIS) (P118109). Each complaint describes the lack of inclusion of important environmental and social risks and impacts in the assessment documentation for MINIS sub-projects. All [REDACTED] cases are associated with enormous the delays in delivery of and substandard quality of environmental safeguard products (ESIAs, REAs, ESMP, etc). Information about each sub-project has not been disclosed in a timely manner, consultations with local community stakeholders have not been meaningful, and the measures recommended by the Inspection Panel in July 2017 to bring the project into compliance with World Bank policies have not been implemented.

This summary complaint will attempt to synthesize and augment to the two complaints from the local communities and the complaint from Rwb.

1. THE PROJECT AND HARMS TO COMMUNITIES AND THE ENVIRONMENT

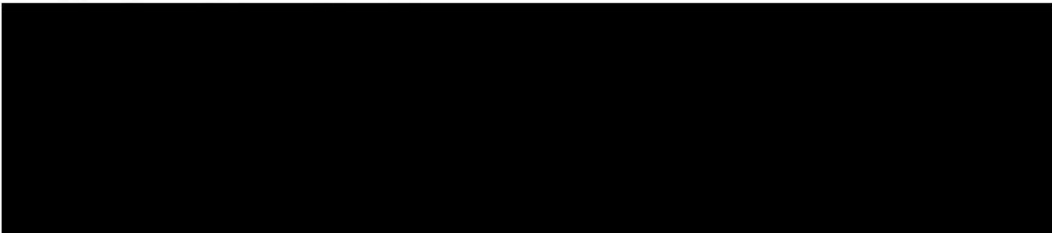
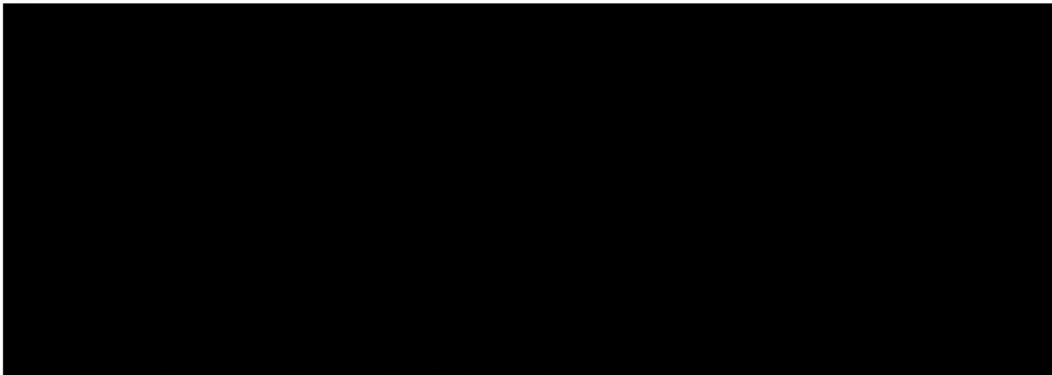
The complaints focus on sub-projects under Component 1 and 3 of the MINIS Project. All [REDACTED] complaints describe how non-disclosure of information and lack of meaningful consultations in violation of OP 4.01 have resulted in a failure to identify actual and potential harm to the environment and local communities, and to set out mitigation measures to avoid unnecessary harm for both Components 1 and 3 of the project.

Component 1: Baganuur coal mine expansion.

A feasibility study and CIA are planned for Baganuur coal mine expansion are included under this component of the Project.¹ While all studies enabling extension have been completed years ago, neither CIA nor EIA have been produced so far. The original 2016 draft of the CIA did not include an associated facility, a 700 Mwt coal-fired power plant [REDACTED]. A revised CIA is planned, and the TOR has not been made available. While the TOR for a revised CIA has not been made available, the interactions with the consultant commissioned to conduct the CIA indicate that the power plant is unlikely to be included in the revised CIA. Meanwhile, construction of the power plant has begun in summer of 2017 and will resume with construction season starting in April 2018.

The coal-fired power plant, an associated facility, is likely to have serious negative impacts on the community, particularly gender, child, and health impacts, which are described in the complaint from the Baganuur [REDACTED]. OP 4.01 requires that such impacts be assessed (and measures set out to avoid) these adverse impacts in the environmental and social assessment documentation for the project. ESIAs for both Baganuur coal mine extension and the 700 MWt CHP were conducted in 2013 and 2014 respectively. These ESIAs contain a listing of "in theory" risks of potential harm that do not address the issues raised by the local communities in the attached complaints, and including with respect to the specific nature of the two-turbine 350 Mwt coal-burning power plant. Baganuur coal is reported to contain higher degree of radiation and therefore the local population is concerned about this facility's impact on air pollution and health. These concerns are not addressed in the 2013 and 2014 EIAs or recent TORs.

¹ <http://www.minis.mn/en/support-for-infrastructure-investments>



Component 3 - Altain-Uvur Gobiin River Basin Administration. According to the MINIS website, the “major goals” of Component 3 consist of: “utilizing and preserving the water resource, improving water safety, ensuring the Gobi population with an adequate drinking water, acceptable by quality standards, improving the strategic policy to protect the water and ecosystem from industrialization and supporting the maintenance of the ecological balance. Component 3 aims to strengthen the groundwater management in the Southern Gobi of Mongolia. Within the scopes of strengthening the groundwater management, the following three river basin administrations (RBA) were newly established covering the entire Gobi area: Umard Gobiin Guveet-Khalkhiin Dundad Taliin RBA, Galba-Uush-Dolood’s Gobi RBA.”² The website lists three RBAs: [Galba-Uush-Dolood’s Gobi RBA](#), [Umard Gobiin Guveet-Khalkhiin dundad taliin RBA](#), and Altain-Uvur Gobiin RBA. Altain-Uvur Gobiin RBA is the subject of this complaint.

Most information related to water research under Component 3 is listed in Confidential reports page and has not been disclosed to the public, including documents on “long term planning mainstream on hydro-geological research,” “assess legal/ institutional framework,” “baseline study for shallow layer groundwater,” “assessment on water safety issues,” and “water sampling and analyze its result of water supply sources of soum center and settled area in the 3 RBAs.”³ While the Altai-Uvur Gobiin RBA lists 58 mining license holders using water it discloses approval data only for 7 large mines – 5 of which are located in Gurvantes soum, home of our local community Requestors. The Requestors are concerned about whether the mining companies claiming that they have due permits and sufficient water resources for extraction and processing of coal are telling the truth and whether their cumulative impacts on community’s traditional water resources have been assessed. They observe an immediate harm to water resources, increased desertification of pasture and farming plots but have no access to information listed in Confidential Reports to understand the actual situation and learn about mitigation measures.

The Bank, by accepting the Mongolian Government’s resistance to observe the WBG policies and non-compliance with its own laws on freedom and access to information in not disclosing information on activities of RBAs and water basin management plans in Southern Mongolia (Gobi Desert region), is seen as siding with government and companies in discriminating against traditional water users in the process of developing water basin resource management plans. Local farmers and herders have not been consulted on potential impacts of coal mining and processing on their water and any mitigation measures and are denied the right to participate in decision-making on water resources – a life sustaining resource in the Gobi Desert. Selection of consultants

² <http://www.minis.mn/en/strengthening-groundwater-management> [last accessed 28 March 2018].

³ <http://www.minis.mn/en/confidential-reports-and-studies> [last accessed 28 March 2018].

professionally not qualified and/or in conflict of interest due to owning a mining license for the assignment to develop water basin management plans further aggravates the unfair competition for water resources in Tos, Toson Bumbat state protected area – a habitat of snow leopard and other endangered species⁴.

2. ACTIONS OR OMISSIONS OF THE BANK AND INFORMING THE BANK

World Bank Management has failed to comply with the obligation to supervise the project to ensure compliance with its policies (in this case, OP/BP 4.01). Concerns have been raised with the Project Team and Bank management via email and in-person [REDACTED], and their responses and lack of commitment to take action [REDACTED] indicates a failure to adequately supervise the project to ensure compliance with Bank policies.

The Requestors have jointly and separately informed the Management, Country Office, PIU and TTLs regarding the issues requested to be investigated in the past. Requestors are requesting investigation into MINIS project based on the fact that non-disclosure of information, lack of meaningful consultations and non-compliance with the WBG policies. For example, OT Watch's request for information on Altain-Uvur Goviin RBA was declined by MINIS stating that the Ministry of Environment and Tourism is in charge of information disclosure decisions [REDACTED]

[REDACTED] Rwb has commented on the Draft ToR for Baganuur CIA during consultations in 2014-15 with MINIS project not providing any response matrices and again commented on the Draft CIA Report for Baganuur during consultations in 2016 with MINIS project not providing response matrices and removing original draft report from the web-site. (Later MINIS posted outdated (not used in tendering) 2014⁵ TOR for a CIA on the website in 2017).

Information supporting our request is provided in the Annex section of this Request. All Requestor stand ready to provide any additional information or clarifications on the [REDACTED] Requests filed by [REDACTED] [REDACTED] Rwb Mongolia and Gurvantes local community on Altain-Uvur Goviin RBA underground water resource management plans; and OT Watch and Baganuur [REDACTED] on Baganuur coal mine expansion sub-project and associated facility.

3. CONFIDENTIALITY

Inspection Panel is kindly requested to keep confidential names of community level requestors listed in the enclosed list of signatories to this Request for Inspection. Names of leaders of [REDACTED] Rwb Mongolia and OT Watch do not require confidentiality.

Signatures:



Sukhgerel Dugersuren, Executive Director, OT Watch, Rwb Mongolia Coordinator
Baga Toiruu, 44-204, Ulaanbaatar -14200, Mongolia, otwatch@gmail.com

⁴ Lhagvasumberel Tumursukh, a biologist of the Snow Leopard Foundation was killed in 2015 for his attempts to prevent coal mining in this part of Gurvantes soum.

⁵ Note that the Mongolian language page carries a TOR for CIA dated 2015.

TO: Ganzalo Castro de la Mata, Director

World Bank Group Inspection Panel
1818 H Street NW, MSN 10-1007,
Washington, DC 20433, USA

1. We, the undersigned complainants, are resident of Baganuur district of Ulaanbaatar and [REDACTED] representing people of this district.

Please see our names, signatures and addresses in the details annexed to this Request for Inspection.

2. We understand that the Mining Infrastructure Investment Support (MINIS) project under its Component 1 is studying the feasibility of the Baganuur mine expansion and carried out a cumulative impact assessment of its potential impacts. The feasibility and cumulative impacts assessments documents have been listed in “confidential materials” for almost two years and only upon the demand to disclose these material that their status has changed to “soon to be disclosed here”, which means they are still not available for us to review and understand what impacts might affect us, when and how.

The confidential (non-disclosure) status of MINIS study documents is in serious violation of not only the Article 3, 6.1 of the Mongolian Law on Organizations Privacy which stipulates that information pertaining to populations health, environmental impacts may not be classified” but is also in violation of the World Bank’s OP 4.01 of the Safeguards Policies on Information Disclosure and Consultation with potentially affected stakeholders.

3. Describe the damage or harm you are suffering or are likely to suffer from the project or program

Air pollution from more coal extraction and new 700 Mwt power production: We are residents of Baganuur district of Ulaanbaatar, the capital highest in air pollution rates in the world, which burns coal from Baganuur mine. “Air pollution has become a child health crisis in Ulaanbaatar, putting every child and pregnancy at risk. The risks include stillbirth, preterm birth, lower birth weight, pneumonia, bronchitis, asthma, inhibited brain development and death. It is a real threat to Mongolia’s human capital,” said UNICEF Mongolia [REDACTED] National and Ulaanbaatar city governments contemplated declaring a state of emergency in January 2018 (see list of links to media coverage of Ulaanbaatar air pollution impacts on the health of young women and children). We, in Baganuur, fear that we will also face such negative impact of air pollution from the planned coal mine expansion and the 700 Mwt coal power generation, which is equal to current Ulaanbaatar installed capacity of CHPs #2, 3 and 4 and therefore might produce the same amount of coal smoke and ash polluting the air. We have no knowledge and information of what negative impacts may come from a coal liquification facility also being studied by the MINIS project.

Risk of increased gender-based violence, human trafficking and crime against girls and women: We are also concerned about a potential greater risk from the thousands of predominantly male workforce moving to Baganuur that will affect negatively on the safety and security of girls and women, which is a problem from existing foreign workforce in Baganuur. Currently there are some 100 Chinese workers in Baganuur working at a metallurgical facility already causing increased prostitution affecting girls and young women not known before here. According to local government information Baganuur mine expansion and the 700 Mwt PP will bring in 3000-5000 more workers to the district, mostly

¹ https://www.unicef.org/media/media_102683.html

Chinese workers. The scope of work for the cumulative impact assessment does not mention gender impact assessment and is not likely to propose mitigation measures.

4. List (if known) the World Bank's operational policies you believe have not been observed.

Lack of information disclosure: We have approached the [REDACTED] [REDACTED] for information but failed to obtain any [REDACTED] information on what the impacts are going to be from these planned and started projects supported by MINIS studies. The local government officials were taken on a study tour to [REDACTED] and they now claim that this is going to a pollution free beautiful PP with a tallest chimney in the world but appear not to have seen any documents required by law in Mongolia and the World Bank information disclosure policies.

Lack of or inadequate consultations: While MINIS project reports of having held consultations in 2016 the consultation materials and response matrices are still not available and we have not found residents who have been consulted on potential impacts of the coal mine expansion and associated facilities and their mitigation measures. A MINIS team visited [REDACTED] [REDACTED] to inform of improving the cumulative impact assessment documents. [REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] had 5 questions to ask from representatives of local government, local community and civil society (5 persons from each group) regarding their attitude to the mine, its future and any positive or negative thoughts about it. The fact that questions did not include mine expansion and associated facilities indicate that the impact assessment will follow the usual consultation with no information on potential new impacts. Whatever new materials will be disclosed they are not likely to resolve our concerns regarding a) assessing potential negative impacts on the safety and reproductive health of girls and women in Baganuur; b) reporting on true findings on potential negative impacts on air quality and health; and c) consultation quality is also not likely to change to consulting on actual mitigation or prevention measures and thus will not be compliant with the World Bank's Safeguard Policies on information disclosure and meaningful consultations with communities to be directly affected.

Lack of gender impact assessment in the TOR: Regardless of the fact that we have been raising concerns regarding potential risks to girls and young women's safety and health none of the recent communications and discussion mentioned gender impact assessment of any kind.

5. **Lack of change in the attitudes and quality of information disclosure and consultations:** Together with Oyu Tolgoi Watch, Rivers without Boundaries [REDACTED] we have sought since 2015 to improve information disclosure and consultations process of MINIS on the Baganuur cumulative impact assessment as well as the sub-standard quality of assessment reports but have failed to see requested information publicly disclosed in the Mongolian language and in an understandable form, made available to the potentially affected local community groups. Only after OT Watch through a panel briefing on the MINIS Baganuur coal mine expansion project at the World Bank AGM's CSOs event in October 2017 that we received a promise to disclose Baganuur coal mine expansion related documents in January 2018. The only document disclosed as of March 2018 is fairly sub-standard quality 2014 TOR for the CIA <http://www.minis.mn/en/reports-on-baganuur-cia>. Non-disclosure of response matrices from previous consultations, lack of will to disclose potential negative impacts from the proposed coal mine expansion and associated facilities and consult with the relevant communities providing prior information in an understandable format on ways for mitigating potential negative impacts are evidence of no change in the MINIS project implementation process and the quality of documents produced. Please see the terms of reference for the cumulative impact assessment provided as supporting documents for this complaint or the above link.

6. We request the Inspection Panel to investigate the following areas to ensure that MINIS project is complying with the World Bank's Safeguards Policies:

Social and gender impact: bearing in mind the current disaster level air pollution in Ulaanbaatar, we request the Inspection Panel to review the Baganuur coal mine expansion feasibility study and cumulative impact assessment work for compliance with environmental and social policies that include analysis of potential increase in air pollution and health of the population already at disaster levels, potential impacts on the safety and security of girls and women;

Climate change: bearing in mind the NDC of Mongolia we request the Inspection Panel to review whether alternatives to this coal project and its associated facilities have been analysed in compliance with OP 4.01 "...compares them with those of feasible alternatives, (including the "without project" situation) and the international commitments and policies of both the Mongolian Government and the WBG.

Sub-standards quality work financed by the WBG, bearing in mind the time and effort that is taking to improve the sub-standard 2015 cumulative impact assessment of Baganuur coal mine expansion to inspect whether the current consultant has the technical capacity and experience to carry out a cumulative impact assessment compliant with the World Bank policies not only in terms of process but also uphold technical quality standards.

Faked consultations, bearing in mind that previous consultations carried out under the cumulative impact assessment by MINIS have failed to a) engage with relevant stakeholders from potential affected communities and vulnerable groups; b) disclose potential negative impacts and consult on mitigations measures we request the Inspection Panel to cause WBG Management to cause MINIS project to comply with the policies and procedures on information disclosure, meaningful consultation based on prior information delivered in understandable language and format to the communities to be affected and other relevant stakeholders.

Signatures lead complainants and primary contact representing complainants:

██████████

D. Sukhgerel

██

Oyu Tolgoi Watch

Date: March 12, 2018

Contact info: OT Watch, Baga Toiruu, 44- 204 Ulaanbaatar, 976-98905828, otwatch@gmail.com

Please do not disclose individual names of all Baganuur signatories for security reasons.

List of supporting documents is provided with the complaint.

Complainants signatures



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To: Gonzalo Castro dela Mata, Chairman, WBG the Inspection Panel

1818 H Street NW, MSN 10-1007
 Washington, DC 20433
 USA

REQUEST FOR INSPECTION OF MINING INFRASTRUCTURE INVESTMENT SUPPORT (MINIS) PROJECT IN MONGOLIA

1. We, the undersigned residents of [redacted] Gurvantes soum are requesting the WBG Inspection Panel to investigate the concerns raised in this complaint. The list of our names and addresses is enclosed to this request for an inspection.

Our addresses are attached complaint signature list.

2. We may lose access to traditional water resources (in the Gobi Desert in Mongolia) due to World Bank’s failure to ensure compliance of its projects with the policies requiring information disclosure and consultations with affected local communities on potential impacts of their projects.

The Huvd and Khurshuut oasis and its springs complexes of Gurvantes soum, the southernmost settlement of Mongolia, are part of the Altain-Uvur Gobiin RBA - the underground water basin. Component 3 of the World Bank’s Mining Infrastructure Investment Support project (MINIS) is responsible for supporting the Altain-Uvur Gobiin RBA Administration and development of the RBA water resource management plans for “utilizing and preserving the water resource, improving water safety, ensuring the Gobi population with an adequate drinking water, acceptable by quality standards, improving the strategic policy to protect the water and ecosystem from industrialization and supporting the maintenance of the ecological balance”¹. However, because there is no information disclosed about what they are doing, their reports are classified we do not have the information about what impact is imparted by the existing 6 coal mines on the quality and quantity of our water resources. Many springs and wells have been lost to existing and incoming 6-7 coal mines and we are concerned about how the RBA is managing the water resources, what are the cumulative impacts of coal mines on us, there is no information disclosed and no consultation has been carried out here. We are concerned because current practice has it that when information is not disclosed it is usually to cover up a lack of any assessments work and documents or low quality of faked assessment reports. While the information on the RBA page lists 58 mining licenses it reports of water usage for only 7 mines:

No	Name of the Organizations	Location	Annual Consumption (m ³ /year)
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
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[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

3. **Impacts from existing coal mines:** We have observed that since the operation of coal mines began in 2001 some 32 streams, springs and wells have disappeared. Gurvantes soum underground water resources were formed in early and late Jurassic period over 80-200 million years in underground land fractures/faults to later surface in form of oasis complexes. The local community witnessed how this water resource that hundreds of millions of years to form was destroyed in one year of coal mine operations. Because we witnessed how river [redacted]

¹ <http://www.minis.mn/en/strengthening-groundwater-management>

located in the same latitude with our river have lost over 30 creeks, streams and springs, we fear that the same destiny is awaiting our water resources (life sustaining water resources of two economic entities and 30 farming, 32 herding families). A report from the Working Group formed by the order of Gurbantes Governor is available in the Mongolian language but they would not release it to us. There are 6 coal mines operating in Gurbantes soum:

mostly with foreign financing, which a combined capacity to extract around 30 mln tons of coal per year. Impact from these mining operations in addition to loss of water resources are causing contamination of farm and pasture vegetation resulting in degrading health of produce and lost returns from these economic activities putting our livelihoods at risk.

Increased outbreak of various diseases among population living near mines, especially affecting women's reproductive health, miscarriages, still births, fetus stop developing, children with genetic defects are problems women are facing here.

Potential harm from a new mine: Land grab without resettlement or compensation for loss of water access.

When the starts extracting coal in Gurbantes soum's bays there is high probability that the 30 nomadic herding households and over 30 vegetable growing households, a total of over 60 households in will lose access to traditional water sources. Land - pasture and farm land - without water will have no value as economic, cultural and family heritage property. Currently has dug a 2x2 ditch to close of its licensed territory and started working on building a road to replace the military unit's road cut off by its licensed land – all without obtaining a land permit. The DEIA report approved without consultation and consent from the local community to be affected by its negative impact. This report recognizes that the local community will lose access to both traditional land and water resources and recommended to prepare a resettlement plan. However, the company started working without consultation or preparation for the above plan.

Harm from the MINIS project: selection of companies technically not qualified or those in conflict of interest resulting in poor quality water basin assessment and water basin management plan may lead to loss of all surface and soil water resources of the local community. The RBA mandate includes a responsibility and “right to impart a RBA expert opinion, which will be a justification for basing a decision to issue an exploration or mining license and such other rights”. Due to non-disclosure of MINIS and RBA information and decisions it is not possible to see how the TEFS and ESIA defined the water resource use and what permits have been issued. It is not possible for us to find out how water use permits were issued by this RBA that will affected traditional users like us and if this RBA did not issue it then who, when and how issued water use permits to this coal mine. What we have heard but again not able to confirm is that the tender for development of the RBA water basin resource management was announced, then challenged based on a selection of a technically unqualified entity, cancelled and re-announced in 2017 with no plan developed yet. We know that for the Galba-Uush Dolodyn Gobiin RBA a company that owns a mining license was contracted to develop a water resource management for that RBA. We also have heard that the cost of development of a RBA management plan was increased 5-6 fold compared to previous years, increasing from 50 mln MNT to 350 mln MNT but no plan was consulted and or even presented to us yet.

Harm from MINIS project: The World bank project's non-disclosure of information and lack of consultation creates environment conducive for companies to breach our right to traditional water resources. Non-disclosure of information provides opportunity for companies to claim that water resource needs have been justified without showing any justification document or permit for projects licensed to take away our pastures and vegetable plots and close access to our water. This in turn is a not only in violation of the WBG's policy on respecting the rights of local communities to decent livelihood and development but is directly in conflict with the Bank's poverty reduction mandate.

Non-disclosure of information provides opportunity for the company to claim that no harm will be caused to local water resources without a RBA opinion justifying this statement or showing a water permit. Thus, the WBG project is creating conditions conducive for violation of our right to traditional water resources by coal mining companies.

4. List (if known) the World Bank's operational polices you believe have not been observed.

Non-disclosure of information, lack of consultations of any kind in Gurvantes, the poor outreach and sub-standard performance of the MINIS project are not conforming with the WBG safeguards policies requiring to protect the local communities' right to decent livelihood and thus is in direct contradiction with the World Banks mandate to fight poverty.

5. We had no knowledge that management of our underground water resource basin fell under the World Bank MINIS project and therefore have not approached World Bank management or other officials with our concerns. However, our partners Oyu Tolgoi Watch and Rwb have engaged with the World Bank and its project regarding lack access to information but were directed to request the information from the MNET.

Our request for information from MINIS PMU has resulted in their recommendation [REDACTED] to address our request to the MNET, as MNET is responsible for managing the RBAs. The fact that MINIS PMU advised to seek information from the MNET is in violation of the Bank policy requirement to abide by the host country legislation, which stipulates that information pertaining to an organization's activities, technology which is causing or can potentially cause impacts on public health, environmental impacts" fall under the category of information that may not to be classified.

In 2015 [REDACTED] filed a complaint regarding the same non-disclosure of information and lack of consultations. The Inspection Panel decided to defer its decision on investigation basing on the fact that there is no harm on the ground. Two years after, in July 2017 decision was made not to investigate the project due to extensive information disclosure and consultations carried out in RF and Mongolia.

Our case is different. There is immediate harm on the ground to our water resources due to lack of appropriate RBA water resources management plan and lack of information and consultations on the impact of extensive coal mining is having on our traditional water resources.

6. Recommendations to the WBG EDs

Given the fact that there is no assessment of cumulative impacts of 6-7 coal mines operating in Gurvantes and current increased water usage due to coal mines building processing plants and failure to implement the project mandate to protect the water ecology and quality from industrialization, questionable quality tendering process and the slow process of development of RBA water resource management plans, please recommend the following to the Executive Directors 1) review the MINIS projects decision-making governance; 2) Carry out a cumulative impacts assessment based on the MINIS project RBA mandate to ensure that "utilizing and preserving the water resource, improving water safety, ensuring the Gobi population with an adequate drinking water, acceptable by quality standards, improving the strategic policy to protect the water and ecosystem from industrialization and supporting the maintenance of the ecological balance"

3) Disclose the assessment report and carry out a consultation process before decisions are made on water usage compliant with the relevant international standards,

Signatures:

[REDACTED]
[REDACTED]

SUKHGEREL Dugersuren
Oyu Tolgoi Watch NGO

[REDACTED]

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