Responsibility of Mining Sector of Armenia for Environmental and Public Health Issues

Policy Brief

Positioning of the problem

In order to develop a strategy for the development of the mining industry in Armenia, first of all, it is necessary to find radical solutions to the environmental and health problems that have been stagnant for decades. At the same time, we should not avoid a confrontation with all the main problems, because without their solution, it is simply impossible to start a meaningful public dialogue in Armenia on this area, which is currently being managed irresponsibly. The problems of institutional capacity, including the professional specialists and technical equipment, the lack of a reasonable assessment of the benefits and losses, the lack of regulation of public health issues make the prospect of further development of the sector an artificial process, cut from the professional basis and political expediency.

Main legislative and institutional issues and gaps

Environmental and health problems that require priority solutions can be conventionally divided into three main groups:

a) Improving the quality of the EIA process and involving authorities in other areas in the process of providing expertise and permits;

b) A full analysis of the benefits and losses of mining projects;

c) Assessment and examination of the impact of the mining industry on public health.

In the process of issuing permits for subsurface use, not all state authorities, whose professional activities include assessing the impact of this project, are involved as responsible state authorities (in addition to environmental, also health, economic, territorial development, preservation of cultural heritage, etc.)

There is no verification of the benefit-loss ratio of the mining program, which can be used to assess the overall socio-economic impact of the project. There is no legal requirement for that, as well as by-laws and methodological guidelines.

Currently, there is no assessment of the impact of the mining program on human health when issuing permits for subsurface use, as well as an examination and assessment of compatibility with the development of territorial administration and other sectors of the economy.

Preliminary recommendations for policy development

- In order to make the process of issuing permits comprehensive and reasonable, at least the authorities responsible for health, economic development and the preservation of cultural heritage should be involved at the expert level.

- In addition to expertise and assessment of the impact on the environment and human health, when granting a permit, the compatibility of a particular mining program with other economic entities carried out at a given place, as well as the impact of the program in terms of preserving cultural heritage, should also be assessed.

- The ratio of socio-economic benefits and losses provided by the subsurface use program should be assessed not in terms of the private commercial interest of the company, but in terms of comprehensively evaluated public good.

- Studying international practice should help develop a normative mechanism for assessing and evaluating the impact of subsurface use on human health, as well as to establish a legislative mechanism for compensation for damage.

International best practice

The example of Sweden can be considered as a positive international experience in issuing subsurface use permits. The issuance of a mining permit in this country is carried out by a specialized court only after hearing all interested parties during the trial and after a comprehensive assessment of the facts.

The best example of assessing the benefit-loss ratio in the sector can be the guide to assessing the benefits of large investment projects in the European Union. It is designed to assess the viability of not only the mining industry, but also all major projects in general, and is based on the premise of improving the well-being of society, rather than on a purely design profitability criterion with a cost-benefit methodology.