

Response to Barrick Gold Corporation's critique of IPM-Report 2009

Following the publication of the IPM-Report 2009 on the web site of "Business and Human Rights Resource Centre", critical remarks from the two mining companies, namely "Geita Gold Mine" managed by Anglo Gold Ashanti and "North Mara Gold Mine" managed by Barrick Gold Corporation (hereafter referred to as Barrick), were published. As the findings near NMGN were rather serious in terms of Arsenic contamination, the human and environmental impacts in that area have received the most attention lately.

This document is a response to the so called "inaccuracies and limitations" of our study, referred to as the IMP-Report 2009. We appreciate Barrick's comments, and we hope that this response can contribute in solving some possible misunderstandings. The focus of our study was to carry out a scientifically based survey to provide solid results for describing the current environmental chemical situation in the area. The sampling sites selected can always be discussed, but the analytical protocols followed and the results obtained are of highest scientific standard. Therefore, the findings should be used to ensure that the mining activity does not harm the local population or cause irreversible harm to the natural resources. We are sure that this is of great importance also for the companies and authorities responsible for the development of these mines. Therefore, we appreciate Barrick's critical remarks as we are then given the opportunity to reply.

Barrick is generally concerned about the methodology used. We would be very pleased if Barrick can review our methods, and reply specifically to what those concerns are. Their specific remarks in their response of 15th December 2009 are addressed under:

1. Barrick states: "Contrary to statements on page 13 and 19, there is no storage facility located in the Gokona/Gena mining area".¹

We have no comments to this point. If Barrick is interested in guiding us around, introducing us to the different parts of production and waste management, we would consider accepting such an invitation.

2. Barrick states: "Contrary to statements made on pages 1, 13 and 19, there have been no tailings dam spills, or other similar incidents, associated with the North Mara Tailing Storage Facility".

Please show us Barrick's monitoring program of the environmental chemistry downstream you Storage Facilities. Although no accidents in that area have been reported, one cannot deny an ongoing subsurface seepage of mining associated spill occurring as long as an ongoing monitoring program is not available. Our findings strongly indicate that such leaching might be a very likely explanation for the very high Arsenic concentrations determined in ponds downstream the tailing storage. Referring to Table 12 reporting analysis of water samples withdrawn from sites 27, 29, 32 and 33, all downstream the large tailing store facility, the Arsenic concentrations in water samples taken from those sites are very high.

3. Barrick states: "No natural background condition was established in the paper; therefore it is impossible to characterize a mine-related impact. The bedrock geology of the entire study area

¹ All statements from Barrick Gold Corporation can be found in this document: <http://www.reports-and-materials.org/Barrick-Gold-response-re-alleged-water-contamination-in-Tanzania-15-Dec-2009.pdf>

(the Lake Victoria Greenstone Belt) contains naturally elevated metal values and it is not unusual for the soils to show above-average levels of arsenic, lead, copper, nickel, etc. Likewise, stream sediments in these types of areas will display elevated concentrations of metals. The study fails to take into account this key consideration”.

This statement is generally very relevant; however, Barrick fails to acknowledge the analysis of water taken from for instance sites 23 and 19. Site 23 is located upstream the storage facility and the Arsenic concentration in this water sample is well below WHO drinking water standards, and well below the samples taken from sites 18, 21, 22, 27, 29, 32 and 33. Sites 18, 21 and 22 are now known as an accidental site, but that is not the situation for the area where samples 27, 29, 32 and 33 were collected. These water samples (27, 29, 32 and 33) contained alarmingly high Arsenic concentrations as well, and they are all located downstream the large tailing storage facility. Moreover, they are all sampled from fruitful land. No previous remark about the very high arsenic concentrations in this area is known to us. Hence we have no reasons to believe that Barrick Gold Mine is providing official documentation that they are monitoring the soil, sediment or water chemistry in that area. We would also like to address Barrick’s attention to site 19. This site is upstream the accident site, and also here, the water holds a good chemical standard. This site is taken from running water which should be affected by the drainage basin in the area, selected only a short distance upstream site 18. Site 18 was strongly affected by the May 2009 accident. The water quality of sample 19 is good and hence there are no reasons to believe surface bedrocks with natural high Arsenic oxides etc can be connected to the reported contaminations. Not there, or further down.

4. Barrick states: “The study’s examination of arsenic excluded other very significant sources of arsenic such as artisanal mining activities surrounding the North Mara Mine and the impure phosphate fertilizers used on cultivated lands”.

This argument is based on speculation from Barrick’s side. Corresponding to the statements above: If artisanal mining activity is a causal factor for the disputed Arsenic concentrations, such an impact should have been possible to detected in waters samples from site 19 (running water) and 23 (still water) as well. Not only in water sampled just downstream the different storing facilities (sites 27, 29, 32 and 33).