



Impact Assessment Association of Zambia (IAAZ)

IAAZ STATEMENT ON MINING IN THE LOWER ZAMBEZI NATIONAL PARK

Impact Assessment Association of Zambia (IAAZ) was formed in 2004 with the main objective of providing a forum for advancing innovation and communication of best environmental practices in all forms of environmental and social impact assessments, and advocates for its expanded use for the betterment of society and the environment. IAAZ is an affiliate of the International Association for Impact Assessment IAIA, whose vision is "A just and sustainable world for people and the environment".

IAAZ has been following with keen interest the proposed development of a copper mine in the Lower Zambezi National Park, and the ensuing public discussion and debate.

The Lower Zambezi National Park ("the Park") was established in 1983. The Park covers an area of 4,092 Km² along the north-western bank of the Zambezi River. The Park falls entirely within Lusaka Province. According to the International Union for Conservation of Nature (IUCN) classification, the Park falls under category II classification of protected areas. The Park is an ecologically sensitive area and a habitat to several endangered fauna and flora species and offers a continuous ecosystem with Mana Pools National Park in the neighbouring country of Zimbabwe across the Zambezi River.

IAAZ is alive to the fact that development and environmental protection [conservation] are two sides of the same coin. As such, we advocate for sustainable development with emphasis on conservation of natural and ecological habitats.

The proposed development of a mine in the Lower Zambezi National Park requires to be given due consideration and undertaken with a lot of care. We are aware of mining within proximity of protected areas in other jurisdictions. The closest case to us is the Palabora Copper mine bordering the Kruger National Park in South Africa.

Whilst environment and development are two sides of the same coin and can co-exist within a framework that provides for sustainability, IAAZ has concerns with the prospects of developing a mine in an ecologically sensitive area such as the Lower Zambezi National Park. These concerns arise from a number of factors that can be summarised mainly into two:

- 1 The completeness, adequacy, and practicality of the mitigation measures that the developer proposed in their Environmental and Social Impact Assessment studies. We note the absence of detailed specialist studies in the EIA report. If the mine is to go ahead, we wish to advise that there is need for detailed specialist studies particularly on, wildlife ecology, biodiversity and waste management.
- 2 Lapses in the implementation of environmental commitments by large mining conglomerates that has resulted in pollution of rivers and the environment. The location of the mine within the park introduces this risk which in this case can result in serious ecological damage. This is even more critical with the proximity of the Mana Pools National Park ecological system, which is equally an area of natural significance.

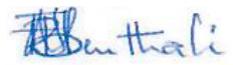
It is our view that while development of a mine in the Lower Zambezi National Park is feasible, stringent mitigation measures followed by strict monitoring have to be put in place before embarking on any such activities.

More importantly, buy-in and involvement of the community and the general public in the whole process is cardinal. The local community including community resource Boards in Lower Zambezi is key to any consultation process as the communities are the immediate parties affected by activities that are not well mitigated. In many cases, members of the communities have indigenous knowledge that would help with the design and development process, with respect to their cultural needs and expectations. Community participation is an important driver of sustainability. Additionally, the general public, are the other key stakeholder in this process - this includes both local and international stakeholders in view of the project being in close proximity to the Mana Pools National Park in Zimbabwe. Thorough public consultation is a requirement under the Environmental Impact Assessment (EIA) Regulations, 1997 of the Laws of Zambia, and in essence should be completed effectively before any decision is made.

The hope of IAAZ in all developmental projects, the proposed mining in the Lower Zambezi National Park inclusive, is that they are done in line with Sustainable Development Goal No. 15 – Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss as well as the other SDGs of relevance to the implementation of the project.

As defined in the Brundtland Report (“our Common Future”), Sustainable Development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs. This definition provides for both inter-generational equity (the future generations must benefit from the exploitation the environment and natural resources) and intra-generational equity (the present generation must equitably benefit from the exploitation of the environment and natural resources). This, we submit should, form the basis of any decision made on the development of a mine in the Lower Zambezi National Park.

For Impact Assessment Association of Zambia



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PRESIDENT