

## **Environmentalists' Wishlist: Recommendation for environmental Improvements in Uranium Mining**

- **Buyers:**
  - regulation and/or self-conduct of product declarations for electricity, including the origin of raw materials, the environmental characteristics of the complete fuel production and waste management and disposal chain
  - evaluate producers and dynamically adjust company-specific minimum standards for raw materials and their pre-production-chain
- **Producers:**
  - self-conduct on regular comprehensive environmental and health reports
  - self-conduct for application of continuous best-practice in mining and waste management during operation
  - comprehensive environmental impact analysis prior to mining and regular updates during operation and prior to mine closure
- **Traders:**
  - standardisation and certification for Uranium products with minimum requirements and regularly updated dynamic environmental and social standards that continuously reflect best-practice
- **National authorities:**
  - in the permitting process: urge applicant to include a comprehensive and sound health, environmental and waste management concept; require the applicant to show that he will be able to reclaim the mine, mill and waste to an environmentally acceptable state after closure of the mining operation
  - during operation: set proper, regular, independent and close controls on safety, environmental and health issues,
- **National laws:**
  - require the environmental administration to set up an independent Environmental Impact Assessment (EIA)<sup>1</sup> process for each application that

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<sup>1</sup> EIA is a process within the permit process that evaluates all environmental impacts of the filed project. It includes an impact study (EIS, prepared by the applicator or on behalf of him), internal and/or public hearings to bring knowledge on impacts to the attention of the authorities, the

seeks for a permit or for a relevant change in the permit, that fulfils the following requirements:

- its process, evaluation and results should be completely separated and independent from the applicator and from the ministry responsible for mining regulation,
  - make sure that the persons involved in that process are well-informed and well-trained in EIA processes and in the technical and environmental issues typical for that kind of projects, and are persons with the necessary integrity
  - make all documents in this process publicly available,
  - require the applicator to prepare a comprehensive Environmental Impact Study, based on the finally planned production and waste management process,
  - require the administration to evaluate the study for completeness, based on well-defined evaluation criteria, and only accept the application if it is evaluated as being complete,
  - after publication give enough time for the general public, interest groups and individuals before you expect their statement,
  - provide rules, procedures and guarantees to ensure that individuals, organisations and local and governmental agencies can compensate their necessary expenditures for participating in the EIA process and that the applicator is kept responsible for this compensation,
  - after the defined publication period, hold hearings on the issues, where at least all received oral and written statements should be discussed, and which are held by the agency responsible for environmental issues and which are organised and directed by this agency,
  - evaluate all statements and provide a summary with the approved and disapproved statements including the reasons and the additional obligations for the permit that avoid or reduce environmental impacts and improve environmental and social sustainability.
- define national waste management standards that are to be respected by any applicant, and include clear post-mining requirements for the release of

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evaluation of the impacts by the competent authority and, where necessary or appropriate, measures to eliminate or reduce impacts as stipulated in the permit.

the operator from its obligations and the pre-compensation for long-term environmental monitoring

- set a permit requirement that requires every mining operator to set up an independently controlled financial fund that – at every point during operation and until mine closure – provides enough financial means to clean-up the mine and mill facilities, and to long-term stabilise wastes to an acceptable state, and feed that fund if necessary
  - issue radiation protection requirements for mining, milling and waste operations based on the precautionary principle
  - issue requirements to set-up a socio-economic management plan that copes with the changes in social and economic conditions during start-up and closure of the mining operations and develops alternatives and measures to cushion those abrupt changes
- **IAEA:**
- Define Safety Standards for Mining, Milling and Waste Management operations
  - regularly publish reports on best-practices and lessons-learned in mining, milling, wastes, closure and reclamation operations
  - provide a basis for the formal and informal exchange and the training of environmental and health regulators from countries with active Uranium mines
- **OECD/NEA:**
- Regularly collect and publish overviews on environmental data and characteristics of Uranium mining and milling operations including waste management and restoration