

December 4, 2020

## Open-Letter to INV Metals in Support of Ecuadorian organizations requesting Environmental Impact Study for Loma Larga Project

Ms. Candace MacGibbon  
President of INV Metals  
Toronto, Canada

**Ref:** Respond to Ecuadorian organizations' request for access to critical technical information, make Loma Larga's EIA public

Ms. MacGibbon,

We the undersigned write to you today in reference to a request that was recently made to your company by several organizations in Southern Ecuador who are affected by INV Metals ongoing work on the Loma Larga project (attached here for your reference).

It has come to our attention that lately your company has been making statements to the Cantonal Council of Cuenca, Ecuador, wherein you say that the Loma Larga project will produce no impacts on the ecologically sensitive highland hydrological system, páramo, upon which hundreds of thousands of people depend for clean drinking water. The unique soils and complex hydrology of the páramo also provide critical habitat and or nesting grounds for hundreds of species, many of which are endangered or critically endangered and endemic i.e., specifically adapted and restricted to the Andean highlands of Ecuador.

The Loma Larga project will require constant dewatering to achieve workable conditions. Yet, no information has been provided as to how these significant alterations will affect Azuay's biodiversity and its functions, nor how INV plans to ensure that the well-being of these sensitive species is not jeopardized. At least 4 amphibian species classified as Critically Endangered or Endangered are known to occur in and around the project area. These species play an essential role within a complex web of biological interactions that maintain Azuay's water quality.

In their letter, organizations in Cuenca and the surrounding communities express concerns regarding a dearth of technical information about the Loma Larga project, and a complete lack of access to the primary studies upon which the company's feasibility studies depend. They also note that despite the fact that the company has announced the completion of the Environmental Impact Study for the Loma

Larga project and “began permitting”, they have not seen any results of this study, nor have they been given the opportunity to analyze its contents independently.

As a Canadian company who has operations abroad, it is important to note that the Government of Canada “expects Canadian companies operating abroad to meet or exceed widely-recognized international standards for RBC. Where host country requirements differ from the international standards listed below, the Government of Canada expects Canadian companies to meet the higher, more rigorous standard.” According to the government, one of such standards is the OECD Guidelines for Multinational Enterprises which states that companies should “provide the public and workers with adequate, measurable and verifiable timely information on the potential environment, health and safety impacts of the activities of the enterprise” . Another such standard recognized by the Canadian government is the IFC Environmental & Social Performance Standard, where Standard #1(ii) “establishes the importance of (ii) effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them.”

We too are of the opinion that having access to transparent information is a basic condition for communities to be able to make informed decisions about the future of their lands and water. As the organizations note in their letter, they have their own professionals and have their own local capacities to make assessments based on information that is provided to them. It is important that they are given the opportunity to exercise their capacities as informed citizens.

As the organizations also point out, your company has also made explicit commitments to transparency and providing communities with access to information.

As such we expect you to uphold these obligations and commitments and respond to the organizations’ legitimate request for access to information. If the company is convinced that the project will not impact the páramos watershed, then there should be no reason to continue to withhold technical information from those who have the most at stake.

We expect your swift and positive response on this matter,

Signed,

Animal Alliance of Canada  
Animal Protection Party of Canada  
Barnard-Boecker Centre Foundation, Canada  
CATCA Environmental and Wildlife Society  
Center For Biological Diversity  
Christian Peacemaker Teams, Canada

Committee for Human Rights in Latin America (CDHAL), Canada  
Defend them All, United States  
Earthworks, United States  
Global Law Alliance for Animals and the Environment  
Institute for Policy Studies - Global Economy Program  
Interamerican Association for Environmental Defense - AIDA  
KAIROS: Canadian Ecumenical Justice Initiatives  
MiningWatch Canada  
Mining Injustice Solidarity Network (MISN), Canada  
Mining Justice Action Committee, Canada  
People's Health Movement - Canada  
Rainforest Action Group, Australia

c.c:

Ms. Sunny Lowe, CFO, INV Metals

Ms. Sylvie Bédard, Ambassador, Canadian Embassy in Ecuador

Cuenca, 19 de noviembre de 2020

Ms. Candace MacGibbon  
Presidenta de INV Metals  
Toronto, Canadá.

De nuestra consideración:

Le escribimos a usted, después de haber revisado la carta que INV Metals envió al Concejo Cantonal de Cuenca el 11 de agosto de 2020, poco antes de que la Comisión de Ambiente del Concejo aprobara, con los votos del alcalde y 14 concejales, el proyecto de consulta popular para que los ciudadanos y ciudadanas de Cuenca decidan si están o no de acuerdo con la explotación minera metálica en las zonas de recarga hídrica de 5 ríos del cantón.

En aquella carta, dicen: *“Nos gustaría trabajar con los miembros del Concejo para asegurar que haya información precisa disponible, de esta manera, cualquier temor o inquietud que el público pueda tener con respecto al proyecto podrá ser solventada y abordada”*. En la carta, también expresan que *“INV Metals es una empresa con sede en Canadá que está comprometida con la ejecución de los estándares profesionales más altos y éticos dentro de la industria minera global”*.

De la misma forma, en su sitio web, la empresa expresa su compromiso con la transparencia y la responsabilidad corporativa:

*“INV Metals está comprometida con la responsabilidad social corporativa... nuestro equipo concentra sus esfuerzos en proyectos de sostenibilidad, el seguimiento continuo de las partes interesadas **y un sistema de información y comunicación** para los residentes del área de influencia que rodea al proyecto Loma Larga. La infraestructura, productividad, **capacitación, responsabilidad ambiental, difusión de la información sobre minería** y el apoyo cultural, son los pilares del diseño y de la implementación de programas en asociación con las comunidades locales. INV Metals se enorgullece de ser un socio que cumple con el objetivo de seguir contribuyendo para que las comunidades circundantes se conviertan en excelentes lugares para trabajar, vivir y formar una familia.”*

La carta asegura que el proyecto Loma Larga no producirá ningún impacto para el páramo en las cercanías de la mina. Sin embargo, INV Metals tiene un conflicto de intereses, pues la empresa pretende desarrollar la explotación minera con fines de lucro. Por eso, más allá del análisis oficial de la empresa, queremos que nuestras comunidades y profesionales accedan a la información, para elaborar nuestro propio análisis. Este es un paso esencial para debatir el futuro de los páramos de Kimsakocha, de forma democrática y amplia, entre toda la ciudadanía.

Hasta hoy, las comunidades, organizaciones y ciudadanía hemos recibido el análisis de la empresa sobre la problemática páramos-minería sin ninguna fuente primaria, a pesar de que muchos de los estudios se hayan elaborado en convenios con entidades públicas y

académicas. Estar “comprometidos” con las comunidades y organizaciones de esta hermosa región, que depende de las aguas de Kimsakocha, implica respetarnos como gente seria, educada y capaz de analizar las realidades que nos rodean.

El 31 de agosto la empresa publicó que el Estudio de Impacto Ambiental fue terminado para el Proyecto Loma Larga. Y el 15 de septiembre publicó en una presentación oficial que se había terminado el estudio y que el proceso de obtener los permisos, arrancó. Sin embargo, no hemos recibido ninguna información al respecto y tampoco hemos visto los resultados de dicho estudio.

Por tanto, le solicitamos muy respetuosamente **que nos faciliten el Estudio de Impacto Ambiental y Plan de Manejo Ambiental del Proyecto Minero Loma Larga Bajo Régimen de Gran Minería para las Fases de Explotación y Beneficio**, además de los estudios enlistados en el documento adjunto, para que sean revisados de forma independiente por nuestros profesionales. Para nosotros esto significa un derecho básico que se nos debe otorgar como miembros de las comunidades circundantes.

Esperamos su gentil respuesta, a los siguientes correos electrónicos:

- [guapondeligyasunidos@gmail.com](mailto:guapondeligyasunidos@gmail.com)
- [cabildoporelaquacuena@gmail.com](mailto:cabildoporelaquacuena@gmail.com)
- [fundacionsaviaraja@hotmail.com](mailto:fundacionsaviaraja@hotmail.com)

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Cordialmente,

- Cabildo de Mujeres de Cuenca
- Cabildo por el Agua de Cuenca
- Escuela de Agroecología de Tarqui- La Victoria
- Escuela Popular Agustín Cueva Dávila
- Fundación Savia Roja
- Junta de Agua Tarqui – La Victoria
- Red Agroecológica del Austro
- Unión de Sistemas Comunitarias de Agua de Girón
- Yasunidos Cuenca

## **ESTUDIOS SOLICITADOS – LOMA LARGA**

- “Estudio de Impacto Ambiental y Plan de Manejo Ambiental del Proyecto Minero Loma Larga Bajo Régimen de Gran Minería para las Fases de Explotación y Beneficio”

### **Además de los siguientes estudios referenciados en el Estudio de Factibilidad Loma Larga**

BQE 2018a: Treatment of Mine Impacted Water at Loma Larga. Engineering Design Report, October 26, 2018

BQE 2018b: Selenium Removal from Mine Impacted Water at Loma Larga as Project Contingency, Addendum to Water Treatment Plant (WTP) Engineering Design, November 7, 2018.

ERM 2018: Proyecto Minero Loma Larga: Water Modelling Report. Prepared for INV Minerale Ecuador S.A. by ERM Consultants Canada Ltd.: Vancouver, British Columbia.

ERM, 2017: Review and Identification of Data Gaps of Baseline Studies for the Loma Larga Project. Prepared on behalf of INV Metals, Inc.

Golder 2009: Assessment of Critical Hydrogeological Issues, Quimsacocha Project, Ecuador. Prepared for IAMGOLD Corporation, June.

NewFields 2018: Seismic Hazard Assessment Report Loma Larga Project, Azuay Province, Ecuador, March 30, 2018.

NewFields 2018a: Technical Memorandum Rougher Tailings – Geotechnical Laboratory Testing Summary, Loma Larga Project, 2 February.

NewFields 2018d: Technical Memorandum Site Visit Trip Report, Loma Larga Project, Azuay Province, Ecuador, 14 May.

NewFields 2018e: Technical Memorandum Interim Results for the Geochemical Characterization of Floatation Tailings, Loma Larga Project, Azuay Province, Ecuador, 17 May.

NewFields 2018f: Technical Memorandum Static Test Results for Prospective Quarry Sites, Loma Larga Project, Azuay Province, Ecuador. 15 June.

NewFields 2018g: Technical Memorandum Additional Climate Analysis, Loma Larga Project, Azuay Province, Ecuador, 27 September.

NewFields 2018h: Technical Memorandum Water Balance – Filtered Tailings Storage Facility, Loma Larga Feasibility Study & NI 43-101 Report, Azuay Province, Ecuador, 27 September.

NewFields 2018i: Filtered Tailings Storage Facility, Loma Larga Project Feasibility Study. 19 November.

NewFields. 2018: Technical Memorandum: Climate Analysis Loma Larga Project Azuay Province, Ecuador. April 30, Prepared on behalf of INV Metals, Inc.

PROMAS (Universidad de Cuenca), 2009 (March): Estudio de hidrología - informe segundo año. Universidad de Cuenca.

PROMAS (Universidad de Cuenca), 2011a: Informe de Edafología. Línea Base en Hidrología para los páramos de Quimsacocha y su área de Influencia. Universidad de Cuenca.

PROMAS (Universidad de Cuenca), 2011b: Línea Base en Hidrología, Cuarto Año. Universidad de Cuenca.

Propaxis, 2018: Social Baseline Report for Loma Larga Project.

Propaxis, 2018: Línea Base Social Proyecto Loma Larga. Prepared on behalf of INV Metals Inc.

Propaxis, 2018: Línea Base Social Proyecto Loma Larga. Prepared on behalf of INV Metals Inc.

Universidad de Azuay, 2017 (Diciembre): Informe Final del Monitoreo Biótico del Proyecto Minero Loma Larga. Coordinación Dr. Pedro Astudillo Webster, Blgo. Santiago Barros Q., Blgo. Boris Landázuri P. Escuela de Biología, Ecología y Gestión. Cuenca, Ecuador.

Universidad de Azuay, 2018 (Febrero): Informe Final del Monitoreo Biótico del Proyecto Minero Loma Larga. Coordinación Dr. Pedro Astudillo Webster, Blgo. Santiago Barros Q., Blgo. Boris Landázuri P. Escuela de Biología, Ecología y Gestión. Cuenca, Ecuador.

Cuenca, Ecuador

November 19th, 2020

Ms. Candace MacGibbon  
Presidenta de INV Metals  
Toronto, Canada.

Dear Ms. MacGibbon,

We are writing to you, after having reviewed the letter that INV Metals sent to the Cantonal Council of Cuenca on August 11, 2020, shortly before the Council's Environment Commission unanimously approved, with the votes of the mayor and 14 councillors, the Popular consultation project for the citizens of Cuenca to decide whether or not they agree with metal mining in the water recharge zones of 5 rivers in the canton.

In that letter, your company states: "*We would like to work with Council members to ensure that accurate information is available so any fears or concerns the public may have regarding the project can be addressed and addressed.*" It also states that "*INV Metals is a Canadian-based company that is committed to the execution of the highest professional and ethical standards within the global mining industry.*"

Similarly, on your company's website, the company expresses its commitment to transparency and corporate responsibility:

*INV Metals is committed to corporate social responsibility... Our team focuses its efforts on sustainability projects, consistent stakeholder follow-up, **and an information and communication system** to the residents of the area of the influence surrounding Loma Larga. Infrastructure, productivity, **training, environmental responsibility**, the **dissemination of information on mining**, and cultural support are the pillars of program design and implementation in association with the local communities. INV Metals is proud to be a partner helping towards the goal to continue to make the surrounding communities great places to work, live and raise a family*

The letter to the cantonal council assures that the Loma Larga project will not have *any* impact on the páramos water systems in the vicinity of the mine. However, INV Metals has a conflict of interest, as the company intends to develop mining for profit. For this reason, beyond the official analysis of the company, we want our communities and professionals to access the information, to prepare our own analysis. This is an essential step to debate the future of the Kimsakocha páramo, democratically and broadly, among all citizens.



To date, the communities, organizations and citizens have received the company's analysis regarding the supposed impacts (or lack thereof) on the páramos without any primary sources, despite the fact that many of the studies have been prepared in agreements with public and academic entities. Being "committed" to the communities and organizations of this beautiful region, which depends on the waters of Kimsakocha, implies respecting us as serious, educated and respectful people, capable of analyzing the realities that surround us.

On August 31, the company published that the Environmental Impact Study was completed for the Loma Larga Project. And on September 15, your company noted in an official presentation that the study had been completed and that the process of obtaining the permits had begun (implying that the EIS was approved). However, we have not received any information about it and we have not seen the results of this study.

Therefore, we respectfully request that **you provide us with the “Environmental Impact Study and Environmental Management Plan of the Loma Larga Mining Project under the Large Mining Regime for the Exploitation and Benefit Phases”**, in addition to the studies listed in the attached document, so that are independently reviewed by our professionals. We see this as a basic right that we should be afforded as members of the communities who will be affected by the impacts of this project, were it to go through.

We expect to hear from you soon. You may send your response to the following emails.

- Yasunidos Cuenca: [guapondeligyasunidos@gmail.com](mailto:guapondeligyasunidos@gmail.com)
- Cabildo por el Agua de Cuenca: [cabildoporelaquacuenca@gmail.com](mailto:cabildoporelaquacuenca@gmail.com)
- Fundación Savia Roja: [wayrapalte@yahoo.es](mailto:wayrapalte@yahoo.es)

## **STUDIES REQUESTED LOMA LARGA**

- Estudio De Impacto Ambiental Y Plan De Manejo Ambiental Del Proyecto Minero Loma Larga Bajo Régimen De Gran Minería Para Las Fases De Explotación Y Beneficio

## **Plus the following studies referenced in the Loma Larga Feasibility Study.**

- BQE 2018a: Treatment of Mine Impacted Water at Loma Larga. Engineering Design Report, October 26, 2018
- BQE 2018b: Selenium Removal from Mine Impacted Water at Loma Larga as Project Contingency, Addendum to Water Treatment Plant (WTP) Engineering Design, November 7, 2018.
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- NewFields 2018: Seismic Hazard Assessment Report Loma Larga Project, Azuay Province, Ecuador, March 30, 2018.
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- PROMAS (Universidad de Cuenca), 2011b: Línea Base En Hidrología, Cuarto Año. Universidad de Cuenca.
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- Universidad de Azuay, 2017 (Diciembre): Informe Final del Monitoreo Biótico del Proyecto Minero Loma Larga. coordinación Dr. Pedro Astudillo Webster, Blgo. Santiago Barros Q., Blgo. Boris Landázuri P. Escuela de Biología, ecología y Gestión. Cuenca, Ecuador.
- Universidad de Azuay, 2018 (Febrero): Informe Final del Monitoreo Biótico del Proyecto Minero Loma Larga. Coordinación Dr. Pedro Astudillo Webster, Blgo. Santiago Barros Q., Blgo. Boris Landázuri P. Escuela de Biología, Ecología y Gestión. Cuenca, Ecuador.