

Community Consent in Mining EIA



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*From Strategic Survey to Social License — A Case Study from Mongolia/ Sublime
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Why Does This Matter?

The growing burden of critical mineral mining on communities

334

incidents 2021–2023

111 per year on average

~90%

in developing economies

of all protest & violence

71–81%

profits to wealthier nations

of mining production

Source: Global Witness, AFREWATCH, JATAM (2024) — ACLED & S&P Global

Legal Approval ≠ Social Approval

Even approved projects can fail
without community trust.

Cooney (1997); Thomson & Boutilier (2011)

An Unequal Burden

Environmental & social harms
fall on producing nations.
Profits flow elsewhere.

Global Witness (2024); S&P Global

The Challenge: Mongolia's Unique Context

Challenges

- ❑ Unclear legal framework
- ❑ Nomadic, dispersed communities
- ❑ Sacred mountains and cultural sites
- ❑ Distrust from past project failures
- ❑ Outside interference exploits uncertainty

Our Evolution

Initially

Goal: obtain community approval.

Now

Identify and plan solutions before conflicts arise.

Confident we can address even the most complex projects.

Core Method: The Strategic Survey

Local communities are the most reliable source of local knowledge.

01 Livelihoods

- › Household income & expenditure
- › Employment and livestock
- › Human and animal health
- › Education and future plans
- › Pressing community issues

02 Environment

- › Rare species and plants
- › Trends in nature over time
- › Sacred mountains and customs
- › Climate changes — rain, wind
- › Unique ecological features

03 Project Perception

- › Awareness of the project
- › Concerns and objections
- › Community development needs
- › Participation in monitoring
- › Ideas for collaboration

Our Guiding Principle

Listen. Listen. Keep Listening.

We do not come to explain — we listen until we understand their world.

✗ Instead of explaining



✓ We listen

✗ Formal group meetings only



✓ Individual interviews

✗ Rush to obtain approval



✓ Build mutual understanding first

Our Process: From Survey to EIA Integration

1

Pre-Study Research

Local culture, history,
key stakeholders,
company reputation

2

Strategic Survey

Individual interviews
3-part questionnaire:
livelihoods, environment,
project perception

3

Deep Listening

Collect all information
Create comfortable
conversation
environment

4

Classify & Integrate

EIA mitigation measures
Environmental Mgmt
Plan
Offset conservation
Community agreements

5

Present Back

Share findings with
community
Builds trust & validation

Four Principles of Success



Active Listening

Create safe conversation space.
Gather sufficient local knowledge.



Translation

Convert technical language
into accessible terms.



Inclusion

Communities co-create the EIA.
Their voices appear in the report.



Correct Placement

Place each concern in the right
EIA section: EMMP, mitigation,
offset, community agreements.

Common Patterns: Problems and Solutions

Common Problems

Water concerns

Leading trigger of resistance worldwide

Lack of trust

Past failures and broken promises

Inaccessible information

Technical reports no one understands

Outside interference

Bad actors exploit uncertainty

Late engagement

Arriving after conflict has started

Effective Approaches

Early engagement

Before the EIA — not during

Continuous dialogue

Ongoing relationship, not one meeting

Co-creation

Decide together, not for communities

Build community ownership

Reduces outside interference

Transparent science

Expert + local knowledge combined

Outcomes of Our Approach

100%

Community consent
obtained

3-Part

Survey covering all
dimensions

All issues

Correctly placed in EIA

Zero

Unresolved conflicts post-
report

The Key Shift in Our Thinking

We started by asking:

"How do we obtain approval?"

Now we ask:

"How do we solve real problems — so approval follows naturally?"

"Consent is not a signature — it is a process."



"Without social license, no project can truly move forward."

Case Studies: The Method in Practice



Iron Mine — Dalanjargalan

Community consent for the EIA had been stalled for 6 years.

Using our method, consent was obtained within 6 months.



Uranium Mining Project — 2026

A major project that faced nationwide opposition in Mongolia for many years.

Community consent was successfully secured using the same approach.

Key Takeaways

1

Community resistance is against uncertainty — not mining.

2

A strategic survey unlocks deep local knowledge.

3

A thorough EIA protects projects even when resistance arises.

4

When communities hear their voice in the report, trust is built.

"Trust moves projects forward — not approvals."



Let's continue the conversation!

Message me your questions or comments in the IAIA26 app.

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