



SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT

**Scoping and Environmental Impact Assessment
for the proposed Manganese Export Facility and
Associated Infrastructure in the Coega Industrial
Development Zone, Port of Ngqura and Tankatara area**

DRAFT EIA REPORT

CHAPTER 15: ISSUES AND RESPONSES TRAIL



Contents

CHAPTER 15: ISSUES AND RESPONSES TRAIL	2
15.1 IDENTIFICATION OF ISSUES	2
15.2 ISSUES AND RESPONSES TRAILS	4

FIGURES

Figure 15.1 Decision-making framework for identification of key issues for the EIA	3
--	---

CHAPTER 15: ISSUES AND RESPONSES TRAIL

This chapter presents an overview of all issues raised following the release of the Final Scoping Report and responses by the EIA team or proponent to these issues.

15.1 IDENTIFICATION OF ISSUES

An important element of the EIA process is to evaluate the issues raised through interactions with authorities, the broader public, the specialists on the EIA team and the project proponent. In accordance with the philosophy of Integrated Environmental Management, it is important to focus the EIA on the key issues.

To assist in the identification of key issues, a decision-making process is applied to the issues raised, based on the following criteria (Figure 15.1):

1. Whether or not the issue falls within the scope and responsibility of the Manganese Export Facility EIA process; and
2. Whether or not sufficient information is available to respond to the issue raised without further specialist investigation.

Following the submission of the Final Scoping Report and the 21 day comment period provided on the Final Scoping Report, additional issues and/or concern have been raised by I&APs prior to the release of the Draft EIA for I&AP review. Issues were sourced as follows:

- **Focus Group Meetings** - A presentation was provided to the Coega Environmental Liaison Committee (Coega ELC) on the 24 May 2012 and on 14 February 2013.
- **Telephone** - issues raised by I&APs during telephonic consultations.
- **Letters and faxes** - issues sent to PPC via fax or posted correspondence.
- **Email** - issues sent to PPC via email correspondence.
- **Comment Form** - issues submitted to PPC via the Comment Form that was provided with Letter 3 mailed to I&APs, notifying them of the review period for the Final Scoping report.

The Appendices of the Draft EIA report contain the supporting meeting notes (Appendix I) and detailed correspondence received (Appendix H). Section 13.2 below provides a summary of the comments received after the submission of the Final Scoping Report and prior to the review of the Draft EIA report and the responses thereto. In summary, the following issues have been identified (number in brackets indicates the number of issues raised) to date:

- Potential Air Quality Impacts (84)
- Potential Impacts on Fauna (8)
- Potential Impacts on Avifauna (4)
- Potential Impacts on Vegetation (16)
- Potential Visual Impacts (9)
- Traffic and Access Issues of Concern (6)
- Potential Impacts on Ground and Surface water (13)

- Potential Health and Safety Impacts (5)
- Potential Impacts on the Marine Environment (11)
- Potential Noise Impacts (5)
- Potential Socio-Economic Impacts (24)
- Assessment of Alternatives (9)
- Project Detail (39)
- EIA and Public Participation (40)
- General and Project Motivation (4)
- Potential Heritage Impacts (21)
- Potential Impacts on Agricultural Land (2)

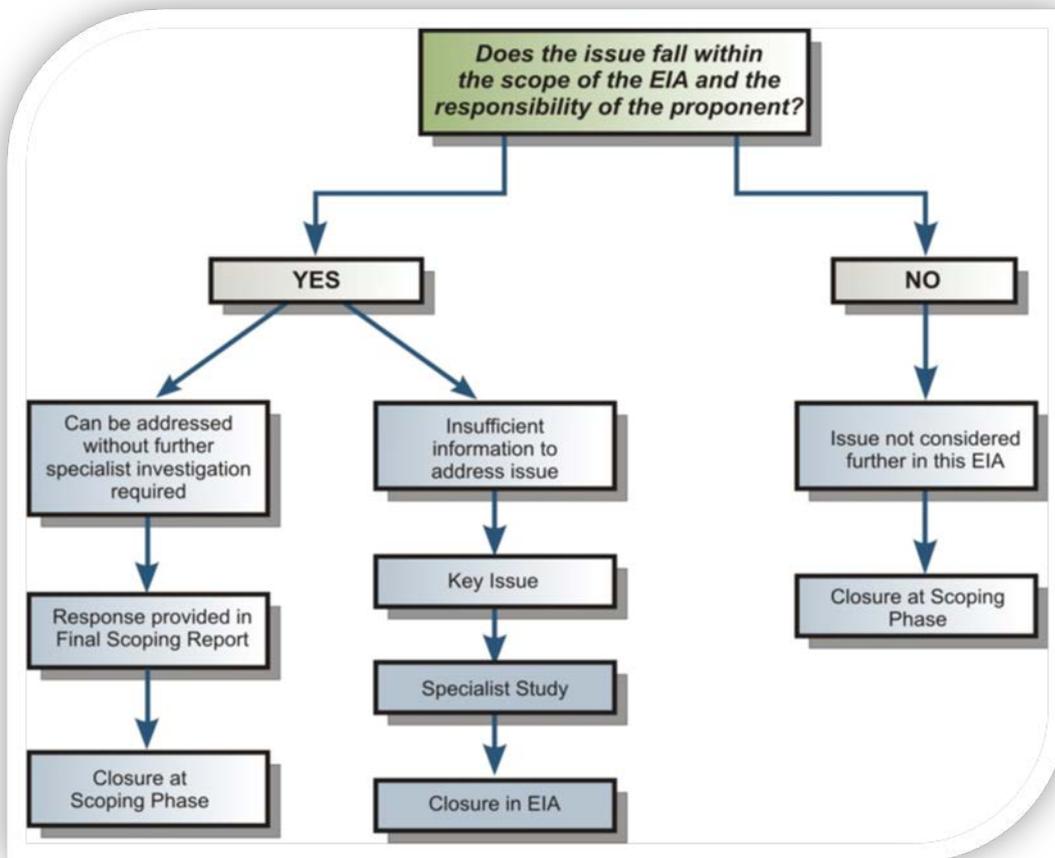


Figure 15.1 Decision-making framework for identification of key issues for the EIA

15.2 ISSUES AND RESPONSES TRAILS

The tables below summarize issues raised after to the release of the Final Scoping Report for I&AP review, together with a response from the EIA team and the proponent, where applicable. A synthesis of issues to be addressed in the Specialist Studies is provided in the Plan of Study for EIA (Chapter 4 Section 4.8). The results of the Specialist Studies will be made available to I&APs for comment as part of the Draft EIA Report. All comments received after the release of the Draft EIA Report, through meetings and written correspondence will be included in the Final EIA report.

1. Potential Air Quality Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto (sent by CSIR to DEA on 9 October 2012)				
1.56	Page3-4: First Paragraph: This Department is concerned that the proposed Manganese Export Facility cannot be contained within the Coega IDZ and that it is deemed necessary for Transnet to purchase more property. What impact will the development have on the conservancy and Addo National Park as one of the prevailing winds if from the south west?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. This section will be amended accordingly in the draft EIA report. The EIA report will investigate and assess the potential impact of dust resulting from the proposed project on the Conservancy and Addo National Park, should they be located in areas of high dust fallout as determined by the air quality assessment.
1.57	Page 3-14: 3.3.4 Air Quality: Dust will occur. The infrastructure is adjacent to the Coega River and Open Space; a conservancy and a national park are located to the east. Control of dust while the manganese ore is being transported until it is loaded onto ships is absolutely critical.	Alan Southwood, Environmental Officer, Specialised Production, Environmental	Email and letter, 13Sep2012	CSIR: comment noted. The Air Quality Assessment in the EIA will assess the impact of dust resulting from the proposed project on identified sensitive receptors and recommend adequate mitigation/management measures.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Innovation in the Environmental Impact Assessment and adequate funding for this purpose during the operation phase are required to ensure that dust is acceptably managed.	Affairs, Cacadu Region		
1.58	Page 4-11: Second Last Paragraph: The <u>AEL application</u> will be....	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. This section will be amended accordingly in the draft EIA report.
1.59	Page 4-23: 4.8.1: Dust will be a problem from the stockyard despite mitigation measures. The long term solution for dust management would be to cover the Stockyard despite it not being “financially viable”. The cost could be written off over the lifetime of the project (Polluter pays principle). The integrity of the environment should not be compromised by cost-saving measures. Making provision for mitigation in the planning stage will protect the environment and prevent costly interventions when dust becomes a problem during the operational phase. Not covering the stockyard can be seen as a fatal flaw in the design of the project. Unfortunately SA does not have a very good record of the	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. The Air Quality Assessment will assess the dust impacts associated with the proposed development and will recommend what form of mitigation measures will be practical and effective. Transnet: Comment noted. Transnet will investigate the feasibility of covering the stockyards from a sustainable development perspective, including environmental, social and economic considerations.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	compliance and enforcement of environmental legislation.			
1.60	Page 5-4: Issues and Response Trails: 1.1 Why will the Air Quality assessment mainly assess fugitive and point source emission during construction? What about the operational phase?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The Air quality assessment will assess emissions during both the construction and the operational phases.
1.61	Page 5-4: Issues and Response Trails: 1.2 Rail wagons should be closed (refer to comment on Page 3-14). What could the “appropriate mitigation measures” be?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The current project design does not provide for the wagons to be covered. Should the Air quality assessment study results show that dust from rail wagons constitute a potential significant impact, the air quality specialist will propose appropriate mitigation measures in the draft EIA report.
1.62	Page 5-4: Issues and Response Trails: 1.3 Will the Air Quality Assessment assess the potential impact on the Addo National Park? What happens if the assessment concludes that dust is not an issue on Tankara but it does become a problem during the operation of the Compilation Yard?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The EIA report will investigate and assess the potential impact of dust resulting from the proposed project on the Addo National Park, should it be located in areas of high dust fallout as determined by the air quality assessment. Mark Zunckel: we predicted dust deposition and ambient concentration at Addo National Park and Tankatara Farm as these have been identified as



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
1.63	Page 5-4: Issues and Response Trails: 1.6 Refer to comment on 1.2 and Page 4-23. What action will be taken if mitigation measures proposed are not adequate? Will it be seen as a contravention of Conditions of an Authorisation?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	<p>potential sensitive receptors and the Health Risk Assessment will also address this issue.</p> <p>Transnet: Operational procedures and monitoring will be in place to determine if the operations do meet the required standards. In the event that mitigation measures are not adequate, measured against the required standards, these will be reviewed to determine where defects or inefficiencies can be improved upon to meet the required design standard.</p> <p>CSIR: The terminal will operate using a complaints register where dust incidents and complaints must be logged and addressed through a formal environmental management system that will be incorporated into the ISO standards required. This procedure will form part of the operational management plan. Furthermore, air quality monitoring is reviewed by the Coega Environmental Monitoring Committee (EMC), which meets on a quarterly basis. Should there be any concerns in terms of dust suppression; the complainant could also contact the Coega EMC.</p> <p>The proposed facility requires an Atmospheric Emission License (AEL) in order to operate. As such, any deviation from the AEL conditions would be seen as a contravention of conditions of a licence.</p>



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				Transnet: In the event that mitigation measures are not adequate, measured against the required standards, these will be reviewed to determine where defects or inefficiencies can be improved upon to meet the required design standard.
1.64	Page 5-4: Issues and Response Trails: 1.10 Moving wagons should also be closed while they travel from the manganese mines to where they will be unloaded the Stockyard.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The current project design does not provide for the wagons to be covered. In terms of the scope of work, this EIA does not include transport of manganese from the mines to Coega although mitigation requirements related to potential dust emissions from wagons, from the compilation yard to the tippler will be addressed.
1.65	Page 5-4: Issues and Response Trails: 1.12 Conveyors should be covered from the Stockyard to the quay where ore is loaded onto the ships.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: The current design includes covering for the overland conveyor. Please refer the project description in Chapter 2.
1.66	Page 5-4: Issues and Response Trails: 1.14 The Department agrees with Patrick Hill that the impacts of dust on Salt Works operations	Alan Southwood, Environmental Officer,	Email and letter, 13Sep2012	CSIR: Comment noted. Mark Zunckel: Dust deposition on the Coega Saltworks

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	adjacent to the Stockyard as well as from the Compilation Yard must be assessed.	Specialised Production, Environmental Affairs, Cacadu Region		from the stockyard and the compilation yard has been assessed as part of the Air Quality Assessment study.
1.67	Page 5-4: Issues and Response Trails: 1.15 Will the Air Quality Assessment stipulate that the transport of ore through the system be stopped if the dust suppression system stops working?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The Air Quality Assessment will assess dust impacts under normal and upset conditions (e.g. malfunction of the dust abatement system) and recommend mitigation measures which will be incorporated in the EMP
1.68	Page 5-4: Issues and Response Trails: 1.17 The question Patrick Hill asked should be answered. Who will have the authority to stop the operation if dust becomes a problem? If the dust suppression system stops working and dust starts impacting Cerebos how long will it (“the formal environmental management system”) take before a decision is taken to stop the operation? Does the Coega EMC have the authority to stop Operations?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Mark Zunckel: the Air quality assessment study recommends SOPs for all aspects of the ore handling system with a focus on operational procedures that minimises dust generation, i.e. emphasises dust control. CSIR: As previously mentioned, the proposed facility requires an Atmospheric Emission License (AEL) in order to operate. As such, any deviation from the AEL conditions would be seen as a contravention of conditions of a licence issued by the NMBM. This issue of monitoring compliance is a broader issue that applies to all EIAs. CSIR will seek to obtain clarity on how compliance monitoring for AELs will be

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
1.69	Page 5-4: Issues and Response Trails: 1.20 Detailed dust suppression methods must be mentioned in the EIA. They must be feasible and cost-effective.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	undertaken in the Coega IDZ CSIR: Comment noted
1.70	Page 5-4: Issues and Response Trails: 1.21 The NMBM might have the authority to monitor but does it, as the Competent Authority for AELs, have the authority to stop the operation of the facility if dust starts negatively impacting on adjacent businesses?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Mark Zunckel: this would be a point that is addressed, if necessary, through the AEL conditions when it is issued Transnet: The terminal will engage in monitoring of the dust fallout surrounding the terminal that will form part of the annual reporting and auditing requirements.
1.71	Page 5-4: Issues and Response Trails: 1.23 What are the dust mitigation measures in the Stockyard and Quay areas as the conveyors are not closed?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: details on dust mitigation measures will be included in the draft EIA report
1.72	Page 5-4: Issues and Response Trails:	Alan Southwood,	Email and	CSIR: Comment noted. Cumulative impacts associated



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	1.27 This type of development will have impacts beyond the locality it is located in. Dust generation during transport of the ore will add to the cumulative impact of the development. Refer to Comment on 1.10	Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	letter, 13Sep2012	with the proposed development will be assessed. In terms of the scope of work, this EIA however does not include transport of manganese from the mines to Coega
1.73	Page 5-4: Issues and Response Trails: 1.30 Manganese dust does not just cause “nuisance effects”. It damages vegetation, pollutes surface run-off and can have serious health implications.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted
1.74	Page 5-4: Issues and Response Trails: 1.32 In reference to the statement “Health risks, if any” there are already widely reported health impacts from the Port Elizabeth harbour manganese facility.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted
1.75	Page 5-4: Issues and Response Trails: 1.43. What mandate does Coega EMC have? Is it advisory or does it have the jurisdiction to stop	Alan Southwood, Environmental Officer,	Email and letter, 02 Oct 2012	CSIR: This issue of monitoring compliance is a broader issue that applies to all EIAs. CSIR will seek to obtain clarity on how compliance monitoring for AELs will be



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	activities if dust suppression measures become inoperative or are found to be ineffectual? How quickly can the EMC react to a reported problem? Should there not be a standard operating procedure to report such problems to DEA so the legal compliance route can be followed?	Specialised Production, Environmental Affairs, Cacadu Region		undertaken in the Coega IDZ
1.76	Page 5-4: Issues and Response Trails: 1.44 This Department supports the concern that it is imperative that suitable and appropriate design limits are used by the specialists to assess these risks.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted
1.77	Page 5-4: Issues and Response Trails: 1.45 Cerebos' concerns must be factored into the assessment process. The study should be able to discern between the potential impacts of the manganese project and air quality impacts of the overall development of the IDZ	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted. The air quality specialist study will look at cumulative impacts related to air quality.
1.78	Page 5-4: Issues and Response Trails: 1.46 The potential impact on commercial agriculture and game farming must be assessed. Refer to comment 1.45	Alan Southwood, Environmental Officer, Specialised	Email and letter, 02 Oct 2012	CSIR: Comment noted. The air quality specialist study will address this issue



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
1.79	Page 5-4: Issues and Response Trails: 1.48 Refer to the Department’s comments in the Draft Scoping Report regarding the transport of manganese ore by trains. This issue should be addressed in the EIA.	Production, Environmental Affairs, Cacadu Region Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Refer to response to issue 1.61
1.80	Page 5-4: Issues and Response Trails: 1.50 This Department supports this suggestion	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted.
1.80	Page 5-4: Issues and Response Trails: 1.52 It is essential to assess these potential air quality impacts	Alan Southwood, Environmental Officer, Specialised Production, Environmental	Email and letter, 02 Oct 2012	CSIR: Comment noted.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
1.81	Page 5-4: Issues and Response Trails: 1.53 This Department supports this suggestion	Affairs, Cacadu Region Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted.
1.82	Page 5-4: Issues and Response Trails: 1.54 Refer to the Department's comments on the Draft Scoping Report regarding the transport of manganese ore by trains. This issue should be addressed in the EIA.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Refer to response to issue 1.61
1.83	How will the impact on the salt pans be considered during the operational phase	Kithi Ngesi, NMBM	ELC meeting 24 May 2012	CSIR: The air quality specialist study will consider the dust and health impacts
Issues raised after the comment period on the Final Scoping Report				
1.84	Cerebos had raised concerns – have these been addressed?	Elliot Motsoahole, TNPA	ELC meeting 14 February 2013	CSIR: Meeting with Cerebos confirmed that the manganese impact on the salt is not an issue as it would most probably settle at the bottom. The impact of Manganese on the health of the Cerebos employees



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
				at the PVD salt plant has been assessed to be of low significance.

2. Potential Impacts on Fauna

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
2.5	Page 2-16: 2.3.2 Rail Compilation yard. It only becomes apparent when the correspondence is read in Appendix 5 of Appendix B that Transnet wishes to purchase certain portion of private land, the Remainder of Farm Tankatara Trust 643, for the location of this infrastructure. This property is part of the Sundays River Conservancy. One of the objectives of the Conservancy is to manage the Kudu population sustainably. This proposed Compilation Yard will conflict directly with this objective. If the owners of Tankatara Trust sell a portion of this property to Transnet, what mitigation measures will be implemented to prevent this conflict? Mitigation measures would most probably have to include the erection of a 2.4 m game fence constructed to Department	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. The potential conflicts with the Sundays River Conservancy's objectives to manage the Kudu population sustainably will be assessed in the draft EIA report as part of the Terrestrial ecology specialist study and relevant mitigation measures will be recommended.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
2.6	<p>Fencing Standards between the Compilation Yard and the Conservancy.</p> <p>Page 5-4: Issues and Response Trails: 2.1 The erection of a game proof fence is supported. Refer to comments on Page 2-16.</p>	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. This request for game fencing can be accommodated in areas where game fencing is affected. The fauna specialist study will assess these requirements and make appropriate recommendations.
2.7	<p>Page 5-4: Issues and Response Trails: 2.3 Fencing is essential. Refer to the Department's comments on the Draft Scoping Report regarding fencing. This issue should be addressed in the EIA.</p>	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted. Please refer to response to issue 13.31
2.8	<p>Page 5-4: Issues and Response Trails: 2.4 These recommendations must be implemented</p>	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted.

3. Potential Impacts on Avifauna

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
3.4	Issues identified after the release of the Final Scoping Report and the responses thereto.			
	None			

4. Potential Impacts on Vegetation

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)			
4.5	Page 2-4: Second last Paragraph: If the boundaries of the Coega Open Space were depicted on Figure 2.2, the reader would get insight into how the proposed development could impact on the Open Space.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The location of the proposed development in relation with the Coega Open Space (version 9) is presented in Figure 3.11 (Chapter 3 Description of the affected environment)
4.6	Page 3-17: First Paragraph: Who “understood” Grass Ridge Bontveld to “contain” a high conservation status? This is a strange statement. Studies in this vegetation community report a	Alan Southwood, Environmental Officer, Specialised	Email and letter, 13Sep2012	CSIR: Comment noted. This section will be amended accordingly in the draft EIA report.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	high conservation status and concern for its future survival due to various impacts on it.	Production, Environmental Affairs, Cacadu Region		
4.7	Page 3-27: Second Paragraph: This Department supports the concern expressed about the gradual fragmentation of the original designated Open Space Areas within the IDZ OSMP and “any revision of the OSMP must be approved by the relevant and competent authorities.” These concerns must be addressed in the EIA. It is accepted that any revision will require substantive amendments to the Coega IDZ authorisations.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. The Terrestrial Ecology Specialist Study that will be conducted during the EIA Phase will assess potential impacts on the Open Space and any potential request to revise the OSMP will follow the approved set procedure.
4.8	Page 3-29: 3.8.1.1 Protected Areas: The Springs is a Local Nature Reserve. Does the Grassridge Private Nature Reserve still exist? Swartkops Local Nature Reserve.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. The Terrestrial Ecology Specialist Study will address this comment.
4.9	Page 3-29: 3.8.1.2: Corridors and Ecological Process Areas: Please quantify the statement “it (the Coeg-Grassridge Corridor) will be indirectly affected by the proposed rail link within Zone 11.” How will the Compilation Rail Yard Link impact on	Alan Southwood, Environmental Officer, Specialised Production, Environmental	Email and letter, 13Sep2012	CSIR: The Terrestrial Ecology Specialist Study that will be conducted during the EIA Phase will assess the potential direct and indirect impacts of the proposed compilation rail yard link on the Coega River/Grassridge Corridor.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
4.10	the Coega River Corridor (designated as a CBA1)? Page 3-30: First Paragraph: The “fine scale mapping” should be part of the EIA process. There is no text within the brackets after “Landscapes”?	Affairs, Cacadu Region Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The Terrestrial Ecology Specialist study will include ground truthing to validate the accuracy of the ECBCP for the study area and important ecological features within the proposed development will be mapped. First paragraph should read: “The terrestrial CBA’s affected by the proposed project…… Functional Landscapes (Figure 3.13).”
4.11	Page 5-4: Issues and Response Trails: 4.1 Not every possible (“any possible impact”) impact on the flora can be mitigated. There will always be some kind of an impact.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted.
4.12	Page 5-4: Issues and Response Trails: 4.2 The reviews and studies described under “Response” are a critical part of the impact assessment process.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
4.13	Page 6-10: 6.5.2.1: Vegetation: The relevance of the ECBC Plan and the potential impact on CBA's is critical.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted.
4.14	Page 5-4: Issues and Response Trails: 4.4 Recommendations must be included in the EMP	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted.
4.15	For the railway, access road/route alternatives proposed cut through the Open Space in the IDZ. Previously, there were issues raised regarding the impact on the Open Space. Were the issues resolved?	Reggy Nkosi, DEA	ELC meeting 24 May 2012	For the proposed development, the approved Revision 9 of the OSPM is used and mitigation measures will be considered to ensure that the impact on Open Space is addressed.
Issues raised after the comment period on the Final Scoping Report				
4.16	OSMP, how much of it will be removed or impacted on with the doubling up of the railway line?	Andrea von Hold, CDC	ELC meeting 14 February 2013	Refer to Chapter 6 Terrestrial ecology specialist study, Section 6.6.1

5. Potential Visual Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
5.5	Page 2-4: Second last Paragraph: Will the proposed stockyard be visible from the N2?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The stockyard is proposed to be located directly north of the N2. The potential visual impacts associated with the proposed development will be assessed as part of the Visual impact specialist study in the EIA.
5.6	Page 4-23: 4.8.1: Stockyard: will the stockyard be visible from the N2?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Refer to response to issue 5.6
5.7	Page 5-4: Issues and Response Trails: 5.1 and 5.2: It will be very important to find an appropriate solution for lighting.	Alan Southwood, Environmental Officer, Specialised Production,	Email and letter, 13Sep2012	CSIR: Comment noted. The Visual impact specialist study will assess the issue of lighting as part of the EIA



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
5.8	Page 6-12: 6.5.2.8: Visual: The visual impact on Tankatara and Addo National Park is important. The owners of Tankatara have raised their concerns about lighting. Refer to comments on 5.1 and 5.2.	Environmental Affairs, Cacadu Region Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Refer to response to issue 5.7. CSIR: The potential visual impacts will be assessed during the Visual Impact Specialist study in the EIA.
5.9	Page 5-4: Issues and Response Trails: 5.3 The question was “What will the new stockyard look like, what will you see”. Is it not possible to provide some kind of artists’ impression of the stockyard?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	Transnet: Examples of what typical stockyards look like will be provided in the EIA report.



6. Traffic, Access and Security Issues of Concern

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
6.6	Page 5-4: Issues and Response Trails: 6.2 The response “Comment Noted” is questioned. Will this issue be dealt with in the EIA? Will any new roads need to be constructed at Tankatara.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: No new roads are proposed at Tankatara, but where road access and rail crossings are required, these will be provided at the relevant locations.

7. Potential Impacts to Ground and Surface Water

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
7.7	Page 2-4: Second last Paragraph: How far is the Retention Pond located from the Coega River?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: The stormwater retention pond at the stockyard will be located approximately 220 to 340 m west of the Coega River.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
7.8	Page 5-4: Issues and Response Trails: 7.1 This is an essential study.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted.
7.9	Page 5-4: Issues and Response Trails: 7.2 Does this imply that all infrastructures for the development will be located above the 1:100 flood lines?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The westerly corner of the stockyard footprint extends beyond the 1:100 floodline. Should Transnet keep this layout, Transnet will need to seek exemption to Clause 2.22 of ROD for the Coega Core Development Area (dated 27 May 2002) which states that “ <i>All facilities planned within the IDZ must be located above the 1:100 floodline as recommended by the environmental design manual</i> ”.
7.10	Page 5-4: Issues and Response Trails: 7.4 Will the stockyard have an impermeable surface to stop manganese leaching into the groundwater?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: An impermeable layer is included in the design.
7.11	Page 5-4: Issues and Response Trails: 7.5 Please provide references for the “standards and specifications for best practice in the	Alan Southwood, Environmental Officer,	Email and letter, 13Sep2012	CSIR: CSIR is currently undertaking a desktop research on best international practices for Manganese, or more generally bulk ore, storage and handling facilities. Each



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Manganese Exporting Industry”.	Specialised Production, Environmental Affairs, Cacadu Region		specialist study in the EIA report will include a section on “best management practices” that will inform the recommended mitigation/management measures.
7.12	Page 6-12: 6.5.2.6 Surface Water: Will all infrastructures for the development be located above the 1:100 year flood lines? This line should be indicated on a map.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: Please refer to response to issue 7.9 above
Issues raised after the comment period on the Final Scoping Report				
7.13	Location of the wetland pans – the recommendation is that these aren’t removed. Need to indicate location thereof.	Graham Taylor, CDC	ELC meeting, 14 February 2013	CSIR: Refer to Chapter 9 Aquatic ecology specialist study, Figure 9.2

8. Potential Health and Safety Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
8.4	Page 5-4: Issues and Response Trails:	Alan Southwood,	Email and	CSIR: Comment noted.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	8.1 It is unlikely that all potential health and safety impacts (“ <u>will</u> identify <u>any</u> ”) can be identified. The study will <u>try</u> to identify impacts.	Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	letter, 13Sep2012	
8.5	Page 5-4: Issues and Response Trails: 8.2 How do these standards and limits compare to standards and specifications mentioned in 7.5?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Standards and limits referred to in issue 8.2 apply to Health and Safety impacts while standards/guidelines referred to in issue 7.5 relate to impacts on groundwater and surface water. Where South African standards/guidelines are available, these will be used when assessing potential impacts. In addition, guidelines/standards for international best practice management will be used, if and where available/applicable, to supplement the impact assessment and inform recommended mitigation measures.

9. Potential Impacts on the Marine Environment

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)			
9.10	Page 5-4: Issues and Response Trails: 9.2 Delete “where applicable”. The compilation of	Alan Southwood, Environmental	Email and letter,	CSIR: Comment noted. The recommendation of compiling an accidental spill response plan in the event of a

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	an Accidental Spill Response plan is an essential component of the EIA.	Officer, Specialised Production, Environmental Affairs, Cacadu Region	13Sep2012	manganese spillage on land, within the Port and the marine environment will be included in the project EMP.
	In terms of the Manganese Terminal – I had a look at Chapters 5 and 6 as you suggested and think in principle all concerns have been raised. In detail I can add the following: Page 5-30 Issues and Response Trails: 9.3 Potential Impacts on the Marine Environment My specific concern is the impact of nearshore manganese pollution on the prey of dolphins (i.e. on the nearshore fish stocks) – as addressed in point 9.3 and 9.6, although the latter seems a bit vague – as well as on the cetaceans directly.	Dr. Stephanie Plön Marine Mammal Scientist, S. African Inst. F. Aquat. Biodiversity (SAIAB) & S. African Env. Obs. Network (SAEON), c/o PE Museum/Bayworld	Email, 25 Sept2012	CSIR: Comment noted. The Marine Ecology Specialist Study in the EIA will evaluate the potential impacts of manganese ore dust on marine ecology (fish stock, cetaceans, etc.), on the nearshore and port environments.
9.11	Page 5-44 Issues and Response Trails: 14. EIA and Public Participation -With respect to point 14.1 the increase and type of shipping traffic should be assessed in view of its potential impacts on the whales and dolphins in the bay.	Dr. Stephanie Plön Marine Mammal Scientist, S. African Inst. F. Aquat. Biodiversity (SAIAB) & S. African Env. Obs.	Email, 25 Sept2012	CSIR: Comment noted. The Marine Ecology Assessment Specialist Study in the EIA Phase will assess the impact of the additional shipping traffic as a result of the proposed development on marine mammals in the bay.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
		Network (SAEON), c/o PE Museum/Bayworld		

10. Potential Noise Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
10.3	Page 5-4: Issues and Response Trails: 10.1 If it is found that the noise generated by the proposed project is more than accepted levels, what will be done (mitigation measures) to reduce the noise to the accepted levels.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The Noise Impact Assessment Specialist Study in the EIA will evaluate noise generated by the proposed project on the surrounding sensitive receptors and will recommend appropriate mitigation measures.
10.4	Page 6-12: 6.5.2.8: Noise: The noise impact on Tankatara and Addo National Park is important. The owners of Tankatara have raised their concerns about noise. Refer to comments on 10.1	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu	Email and letter, 13Sep2012	CSIR: Comment noted. Refer to response to Issue 10.3

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
10.5	<p>In terms of the Manganese Terminal – I had a look at Chapters 5 and 6 as you suggested and think in principle all concerns have been raised. In detail I can add the following:</p> <p>Page 5-33: Issues and Response Trails: 10: Potential Noise Impacts</p> <p>-As discussed on the phone my concern is the potential underwater/marine noise pollution and its effects on marine mammals in particular. There is an ever growing body of evidence and data that should be consulted in this process.</p>	<p>Region</p> <p>Dr. Stephanie Plön Marine Mammal Scientist, S. African Inst. F. Aquat. Biodiversity (SAIAB) & S. African Env. Obs. Network (SAEON), c/o PE Museum/Bayworld</p>	<p>Email, 25 Sept2012</p>	<p>An EIA for the development of the Port of Ngqura was undertaken by CES in 2009. This EIA considered impact of vessel traffic associated with a port on marine mammals (refer to Chapter 7 Subsequent Environmental Impact Report for the proposed Port of Ngqura, September 2009).</p>

11. Potential Socio-Economic Impacts

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
11.24	<p>Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)</p> <p>None</p>			

12. Assessment of Alternatives

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
12.7	Page 4-23: 4.8.1: Stockyards: We do not quite understand the argument for the Preferred Route: <i>“and will not sterilise any future port expansion or quayside activities in this area due to it being placed 400 m behind the future quay line.”</i> The Alternative Route should result in fewer disturbances as it runs for a shorter distance through natural vegetation. A combination of the two where the route first follows the black line under the N2 until the red and black lines meet, and from there to the quayside seems feasible.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Both options (the preferred and the alternative route) will be assessed as part of the EIA process. Refer to Chapter 4, Section 4.8.2 for details on these 2 routes. Transnet: Future port development requires an extension of the port facilities inland which requires that approximately 400 meters is allowed for between the future berths stretching inland.
12.8	Page 5-4: Issues and Response Trails: 12.3 Refer to comments on Page 4-23. (Note: captured under Alternatives issue 12.7)	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. Refer to response to Issue 12.7
12.9	Page 5-4: Issues and Response Trails: 12.5 This Department agrees that this should be explained. Refer to the Department’s comments on the Draft Scoping Report regarding the	Alan Southwood, Environmental Officer, Specialised	Email and letter, 02 Oct 2012	CSIR: Comment noted. Refer to response to Issue 12.7

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	conveyor alignment	Production, Environmental Affairs, Cacadu Region		

13. Project Detail

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
13.23	Page 2-18: 2.3.4 Storm Water Retention Dam and Attenuation Pond: What is the “onsite waste management policy”?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: The terminal waste management policy will be aligned with recommendations and mitigation measures from specialist investigations as well as the requirements of the environmental authorisation and waste management license. Waste management requirements will be incorporated into the Operational Environmental Management Plan
13.24	Page 4-8: First Row of the Table: The Coega IDZ is zoned Industrial and Tankatara Agriculture. Will a rezoning application be submitted to the Metro if a portion is subdivided from Tankatara for the compilation yard?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu	Email and letter, 13Sep2012	Transnet: Yes, this portion of land will be rezoned.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
		Region		
13.25	Page 5-4: Issues and Response Trails: 13.3 The assessment of the impacts mentioned in the Response is critical.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted.
13.26	Page 5-4: Issues and Response Trails: 13.10 Refer to the comment on 1.10 (note captured under issue 1.64)	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: refer to response to issue 1.64
13.27	Page 5-4: Issues and Response Trails: 13.12 The Stockyard should be covered. Refer to comment on 4-23 (Note: captured under air quality issue 1.59)	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: refer to response to issue 1.59
13.28	Page 5-4: Issues and Response Trails: 13.13 The Storm Water Management System must	Alan Southwood, Environmental	Email and letter,	CSIR: Comment noted. The Integrated water management specialist study will assess the effectiveness of the

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	effectively capture and deal with storm water.	Officer, Specialised Production, Environmental Affairs, Cacadu Region	13Sep2012	proposed stormwater management system as part of the EIA report.
13.29	Received your cd and had a quick look at it – my main comment at this stage is the referral – “to adequately demarcate the construction site”. In agricultural terms this does not mean the same thing as “adequately enclose/fence in or out” – no animal domestic or wild, illegal dog pack hunters or trespassers will ever respect their “demarcations” – What will be their intended demarcation?	Peter Lake, Tankatara	Email, 2 Sep2012	Transnet: Working areas will be fenced off.
13.30	With reference to the above FSR and the” Issue and response” aspects contained in Chapter 5 of the report. I write on behalf of owners of Tankatara Properties PTY Ltd and in capacity as chairman of the “Sundays River Valley Thicket,Dunefields and Coega Bontveld Conservancy” which is formally constituted under, and recognized by your department. The response to many of the issues is extremely	Peter Lake, LW Lake and Son (Tankatara) & Sundays River Conservancy	Email and letter, 14 Sep2012	Transnet: As stated previously, fencing will be replaced where it is affected with a similar fence after construction has been completed. Further negotiations for improved fencing will not form part of the EIA process and will have to be addressed through the land purchase agreements. CSIR: The fauna specialist study will assess fencing requirements and make appropriate recommendations as part of the EIA report.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<p>vague, and by example I will refer to issues of critical importance to our situation namely the fencing.</p> <p>2.1 - 3. Where at present the internal and boundary fencing of the SDC Conservancy is considered adequate, the proposed development will trigger a whole new chain reaction of events affecting operations. Game fencing will have to be constructed where previously there was none. This must be enforced by your department, after consultation with the Conservancy management, in any ROD issued.</p>			
13.31	<p>2.4 Fencing of the construction site. The entire construction site must first be enclosed by fencing of the final acceptable standard (not a 5/6 strand stock fence) for the following reasons:</p> <p>1. During the period whilst rail facilities were being upgraded at the previous old Coega station and beyond, in excess of 50 head of livestock were removed from our properties and herded towards Motherwell - (value + R 250 000) some were recovered. SAP records will substantiate this fact. Since (after construction) the fence was erected, no stock has been removed by this route.</p> <p>2. The proposed development corridor is criss-</p>	Peter Lake, LW Lake and Son (Tankatara) & Sundays River Conservancy	Email and letter, 14 Sep2012	<p>CSIR: The terrestrial ecology (fauna) specialist study will assess fencing requirements as well as impacts such as poaching, wood collecting etc. associated with the proposed development and will make appropriate recommendations as part of the EIA report.</p> <p>Transnet: It is important to note that fencing specifications from various land owners are quite different. In this regard, fencing requirements will have to be negotiated on a case by case basis with each landowner. Some landowners require a restriction on movement of animals and people whereas, potential future open space areas, may require fencing that still allows movement of animals through fences. In this regard there may be conflicting requirements that needs specific solutions.</p>

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	crossed by numerous tracks through the bontveld – it will be impossible for any security operation to enforce and confine traffic to a specific access route to the construction area. Much wood collecting, snaring, poaching, removal of indigenous plants etc can be anticipated.			
13.32	3. Indigenous and introduced fauna of many species freely move through and across the development corridor. Poaching with packs of dogs up to 50 in number, on a daily basis is a huge issue (refer SAP). Without cover, and traversing a construction site over such a large area, will only encourage an uncontrollable “free for all”.	Peter Lake, LW Lake and Son (Tankatara) & Sundays River Conservancy	Email and letter, 14 Sep2012	CSIR: The terrestrial ecology (fauna) specialist study will assess this issue associated with the proposed development and will make appropriate recommendations as part of the EIA report.
13.33	Page 5-4: Issues and Response Trails: 13.7 International best practices are essential to give management of the facility international credibility	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Comment noted. International best practices, where available for the storage and handling of Mn ore, will be taken into consideration in the EIA study.
13.34	Page 5-4: Issues and Response Trails: 13.19 Borrow pits must be licensed by DMR. It is an environmental best practices to use material from legal sources	Alan Southwood, Environmental Officer, Specialised Production,	Email and letter, 02 Oct 2012	CSIR: Comment noted. Required licences will be requested from the relevant authorities, where applicable.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
		Environmental Affairs, Cacadu Region		
13.35	Page 5-4: Issues and Response Trails: 13.20 Location of facilities above the 1:100 flood lines is a standard planning principle and should apply to this development as well. The previous EIAs did reach informed conclusions and recommendations on the developments proposed when the original Authorisation was issued. Any changes to these Conditions would require a substantive amendment to the Authorisation (R39)	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Please refer to response to issue 7.9
13.36	Page 5-4: Issues and Response Trails: 13.22 Refer to the Department's comments in the Draft Scoping Report regarding the transport of manganese ore by trains. This issue should be addressed in the EIA	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 02 Oct 2012	CSIR: Please refer to response to issue 1.61
Issues raised after the comment period on the Final Scoping Report				
13.37	Will potable water be used for dust suppression? If so, this is a concern. It must not be a long-term solution	Andries Struwig, DEDEAT	ELC meeting, 14 Feb 2013	Transnet: Yes, it is proposed to use potable water for dust suppression although industrial water and storm water has been made provision for. Alternative industrial water sources could be used if the water is of sufficient quality



CHAPTER 15 – ISSUES AND RESPONSE TRAILS

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
13.38	Service corridor for the conveyor – will this be solely for the conveyor or will it be a general service corridor? Another process/planning should have taken into consideration the identification of a service corridor	Andries Struwig, DEDEAT	ELC meeting, 14 Feb 2013	and no additional chemical treatment is required. CSIR: Alternative water supplies will be considered, in particular the use of return effluent from the proposed CDC wastewater treatment plant, once available and should it be of acceptable quality. Refer to Chapter 10, Section 10.6.1 Please also refer to issue 14.36. CSIR: As part of the EIA, a preferred and an alternative conveyor route have been assessed. At this stage, the corridor has been assessed for the proposed conveyor. However, it could be used as a general service corridor as it takes into account the Port Master Plan and is intended to accommodate the future rail alignment.
13.39	Are there details of the location of the berms and gabions proposed for the stockyard?	Graham Taylor, CDC	ELC meeting, 14 Feb 2013	CSIR: refer to Chapter 2 Project description, Section 2.4.11.3 Transnet: The cross section through the stockyard is given in Chapter 2 in Figure 2-16.



14. EIA and Public Participation

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
14.14	Page3-4: First Paragraph: A more detailed description of what the project entails would be appropriate: that the Rail Compilation Yard is too large and complex to fit within the IDZ; that Transnet intends purchasing a portion of the private property Tankatara to the east of the IDZ; that this property is a part of a conservancy; that there may be conflicts of land-use between the proposed development and the conservancy; that the Addo Elephant National Park is located to the east of Tankatara.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: comment noted. This section of the EIA report will be updated accordingly.
14.15	Page 4-21: Task 10: Final Scoping Report: Why only at these two libraries?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Sandy Wren (Public Process): In addition to the two Libraries, the Final as well as the Draft Scoping Report has been made available through the project website for downloading.
14.16	Page 5-2: Last Paragraph: A subjective decision was made to exclude comments received that are perceived “not relevant to or form part of the EIA process” in the Issues Trail. It is presumed that all	Alan Southwood, Environmental Officer, Specialised	Email and letter, 13Sep2012	CSIR: All comments received from I&APs have been included in Chapter 5 Issues and responses trails chapter and in Appendix H. Should CSIR decide that a comment falls outside the scope of work of this EIA, it is still included



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	comments received are included in Appendix H so the reader has an opportunity to decide what is relevant or not (in other words, are the “not relevant” comments included in Appendix H or what happens to issues after “No” in Figure 5.1?) Will issues that reach “Closure at Scoping Phase” be included in the EIA process if they are relevant for decision making?	Production, Environmental Affairs, Cacadu Region		in the Issues and responses trail (please refer to Issue 1.27 as an example). Issues reaching the “closure at scoping phase” stage are not taken forward in the EIA report, providing that DEA has approved the responses included in the Final scoping report.
14.17	Page 5-4: Issues and Response Trails: 14.2 Refer to comment on Page 4.23 (Note: captured under air quality issue 1.59 and alternatives issue 12.7)	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: comment noted. Please refer to responses to issues 1.59 and 12.7.
14.18	Page 5-4: Issues and Response Trails: 14.4 Refer to comment on 1.27. A Contingency Plan for spills en route to the project area should be included in the EIA. (Note: captured under air quality issue 1.72)	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: In terms of the scope of work, this EIA does not include transport of manganese from the mines to Coega. The recommendation of compiling an accidental spill response plan in the event of a manganese spillage on land within the project area, within the Port and the marine environment will be included in the project EMP. Also refer to response to Issue 1.72.
14.19	Page 5-4: Issues and Response Trails: 14.10 The extent of the mining right needs to be	Alan Southwood, Environmental Officer,	Email and letter,	Transnet: The mining rights of the property will be determined and mapped

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	demarcated to see if it will have any impact on the proposed project.	Specialised Production, Environmental Affairs, Cacadu Region	13Sep2012	
14.20	Page 6-4: Task 1: Review of the Draft EIA Report and EMP: A site visit would be appropriate due to the complexity of the proposed development.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. The CSIR, in conjunction with the proponent, will contact DEDEAT to organise a site visit and a meeting.
14.21	Page 6-5: Task 3: Compilation of the Final EIA Report: It would be appropriate to make the report available at other libraries in the Metro.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Sandy Wren (Public Process): In addition to the two Libraries, the EIA Report will be made available through the project website for downloading.
14.22	Page 6-5: Task 4: Environmental Authorisation and Appeal Period: The way this section is written is that it accepts that the project will be approved. It should be worded in such a way to explain that the competent authority will make a <u>decision</u> ,	Alan Southwood, Environmental Officer, Specialised Production,	Email and letter, 13Sep2012	CSIR: Comment noted. This section will be updated accordingly in the EIA report.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	which could be either to grant or refuse the authorisation (Regulations 35 (a) and (b)) and that normally includes various conditions subject to which the activities may take place (Regulation 36(d)).	Environmental Affairs, Cacadu Region		
14.23	Page 6-6: 6.4 Authority Consultation during the EIA Phase: A dedicated authority meeting and a site visit would be appropriate due to the complexity of the proposed development.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. The CSIR, in conjunction with the proponent, will contact DEDEAT to organise a site visit and a meeting.
14.24	Page 6-9: Second last bullet: Cumulative impacts should be evaluated. Refer to comments on pages 6-9 and 6-10 and Point 1.27	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Refer to response to Issue 1.72
14.25	Page 6-10: 6.5.2 Specific Issues to be addressed “by” Specialists: Tables: It is presumed that a study of fauna in general will be included in the Terrestrial Ecology Study as it is not mentioned elsewhere. Impacts on animals other than birds	Alan Southwood, Environmental Officer, Specialised Production, Environmental	Email and letter, 13Sep2012	CSIR: Comment noted. Title of Section 6.5.2 will be updated accordingly in the EIA report. The Terrestrial ecology specialist study will include a fauna study (refer to Chapter 6 Section 6.5.2.2).



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	and those in aquatic systems are also important.	Affairs, Cacadu Region		
14.26	Page 6-10: 6.5.2 Specific Issues to be addressed “by” Specialists: Paragraph after Table: The EIA also includes a portion of the farm Tankatara. Does the CDC’s Labour Agreement apply to this area? The socio-economic impact of a development of this size on a commercial farm/ conservancy, the Addo National Park area and tourism are very important. Thus a socio-economic study should be included. The CDC Labour Agreement should be included in the EIA.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	Transnet: The Labour agreement will also apply to the Tankatara area. CSIR: The CDC Labour agreement has been included in the Final Scoping report (refer to Chapter 2, Section 2.3.7.3) and will be applicable on all working areas related to this proposed project.
14.27	Page 6.14: 6.5.3.2: Terrestrial Ecology Assessment: Second last bullet. This Department issues permits (not licenses) for the removal of plants and animals.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. Text will be updated accordingly in the EIA report.
14.28	Page 6-15: 6.5.3.3: Aquatic Ecology Assessment: The maps should include the 1:100 year flood lines.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu	Email and letter, 13Sep2012	CSIR: Comment noted. A map showing the 1:100 year flood line and the proposed development will be included in the EIA report.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
		Region		
14.29	Page 6-15: 6.5.3.4: Noise Impact Assessment: Copies of the legislation and standards listed at the end of the paragraph should be included as appendices to the EIA. If they are lengthy documents a link to a website where they can be accessed would also be acceptable.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. Links to relevant websites where identified legislation and standards can be accessed (or purchased in the case of SANS standards) will be included in the EIA report (Reference chapter)
14.30	Page 6-18: 6.5.3.8: Air Quality and Human Health Assessment: Copies of the legislation and standards listed in the Fourth Bullet should be included as appendices to the EIA. If they are lengthy documents a link to a website where they can be accessed would also be acceptable.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: Comment noted. Links to relevant websites where identified legislation and standards can be accessed (or purchased in the case of SANS standards) will be included in the EIA report (Reference chapter)
14.31	Page 7-2: References: A reference for the Standards and Specifications for the Best Practice in the Manganese Export Facility is not given.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: CSIR is currently undertaking a desktop study to find and, if applicable, review available/existing standards/guidelines relating to best international practices for manganese ore (or generally bulk ore) storage and handling.
14.32	Appendix B: NEMA-DEA Application Form: All the	Alan Southwood,	Email and	CSIR: comment noted. All requirements as part of DEA

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	aspects in the Department of Environmental Affairs letter dated 12 April 2012 must be considered.	Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	letter, 13Sep2012	letter dated 12 April 2012 will be addressed as part of the EIA process.
14.33	Appendix C: NEM-Waste Application Form: Section 9: Declarations: All the concerns of the Directors of Tankatara Properties Pty Ltd must be taken into consideration.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: comment noted. Concerns of the Directors of Tankatara listed in Section 9 of the NEM-Waste application form will be addressed in the EIA report. It must be noted that the EIA Report will assess the impacts of the project on existing or approved developments.
14.34	A number of the processes involving transporting large quantities of manganese ore from Hotazel to the proposed export terminal at Port of Ngqura will trigger Listed Activities that require authorisations in terms of the NEMA EIA Regulations, and Waste and Emission Licences in terms of the Waste and Air Quality Act respectively.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: comment noted. In terms of the scope of work, this EIA does not include transport of manganese from the mines to Coega.
	The environmental assessment practitioners thus have the responsibility to ensure that all the environmental aspects of this development			



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	requiring assessment are considered. The Scoping Report has covered most of these adequately. This Department provides these comments to emphasize aspects that could have major environmental aspects and thus should receive special consideration during the process.			
14.35	I would like to confirm that I received written notice of the Final Scoping Report. I am satisfied that our comments have been incorporated in the Issue and Response report.	Andrea Bernatzeder Department of Agriculture, Forestry & Fisheries Environmental Officer Specialized Production: Finfish Farming Monitoring	Email, 6Sep2012	CSIR: comment noted.
14.36	The CDC wants to ensure that the EIA for Transnet’s proposed Mn Terminal and Stockyard correctly captures the following issue regarding water supply, already raised by the CDC: <i>Transnet must collect runoff water in the proposed attenuation pond in Zone 9 and use that for dust suppression. In the event that the attenuation pond is depleted of water, CDC will</i>	Andrea von Holdt, Project Manager: Operations Business Unit – Operations, Coega Development Corporation	Email, 27Aug2012	CSIR: comment noted. This will be included in Chapter 2 Project description of the EIA report. Transnet: The water requirements will addressed in the EIA report. However, it should be noted that all water supplied for dust suppression must be of the correct standard, to suit the export process and safe operations.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<i>provide Transnet with either potable water or Return Effluent.</i>			
14.37	I receive a letter regularly for Patrick Barrett and Bheki Zondo, they are no longer employed at this branch. Please advise what the letter is for and whom should be receiving the letter so I can direct appropriately?	Michelle Joubert Professional Assistant to Mdu Nene, Discovery Health	Email, 6 & 7 Sep2012	Sandy Wren: The project I&AP database will be amended accordingly.
	Thanks for the explanation, please could you address the letter to Mr Hennie Van Staden going forward.			
14.38	Is there a PPP meeting to be held for the Motherwell community, as the community will be concerned about the air pollution	Elliot Motsoahole, Transnet	ELC meeting, 24 May 2012	There will be PPP meetings that will be held in the Motherwell hall.
Issues raised after the comment period on the Final Scoping Report				
14.39	Can you please send me information regarding the work done on the impact of the proposed development (Manganese Export Facility Coega) on agriculture production and/or general background information about the project?	JP Nel, Institute for Soil, Climate & Water Change	Email, 26 Oct 2012	This I&AP was responded to via email and directed to the project website, where all information on the project is available for downloading.
14.40	Please find attached SAHRA and ECPHRA combined comments on the Manganese Export Facility at Coega. We are aware that these are very late in the process, but we would	Mariagrazia Galimberti (PhD) Heritage Officer Archaeology,	Email, 12 March2013	The comments raised by SAHRA have been included in Table 16 below Impacts on Archaeology and Palaeontology



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
	<p>appreciate if our recommendations could still be taken into account during the construction phase.</p> <p>The APM Unit at SAHRA received the Draft Scoping Report related to the above mentioned project. We apologise for the delay in commenting on this case. The proposed manganese export facility and associated infrastructure is expected to be located in zones 5, 8, 9, 11 and 13 of the Coega IDZ. The manganese stockyard and handling facility will be located on zones 8 and 9, while the rail compilation yard and the doubling of the rail will occur on zones 5, 11 and 13.</p> <p>SAHRA has assessed the information in the Scoping Report provided along with the information included in the heritage impact assessments undertaken in 2010 for the area and the archaeological and palaeontological impact assessments undertaken for zone 8 (Port of Ngqura) in 2013. SAHRA and the ECPHRA would like therefore to recommend the following:</p>	<p>Palaeontology and Meteorites Unit South African Heritage Resources Agency</p>		



15. General and Project Motivation

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
15.4	Page 5: Summary: Need for EIA: Last Paragraph: Please confirm that the application for a WUL will be submitted to National DEA and not the Department of Water Affairs.	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: The application for a WUL will be submitted to the DWA. Corrections to the text will be done accordingly on Page 5 Summary

16. Impacts on Heritage Resources

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
16.2	In the vicinity of the Grassridge Rail Station, on Transnet/ Propnet land alongside the existing rail line there are old graves which people living in a compound on site used to bury their deceased. It doesn't affect the "new development" as such, (except there is bound to be earthworks in the vicinity) but wonder if Transnet are even aware of this fact?	Peter Lake, LW Lake and Son (Tankatara) & Sundays River Conservancy	Email and letter, 18 Sep2012	CSIR: comment noted. The Archaeology specialist study will identify any graves that would potentially be affected by the proposed development and recommend the way forward.
16.3	Zone 5: Due to low visibility on most of zone 5, an archaeologist must be present on site during vegetation clearing and an ECO be trained by an archaeologist as site monitor to recognise possible archaeological material.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)
16.4	Zone 5: Two important palaeontological sites have been identified in this zone: one in the cliff section at the west end of the paired stormwater tunnels beneath the N2 and another one on the deep railway cutting west of the N2 to the south of the marshalling yard. If any development had to take place around these two sites, a palaeontologist or an ECO trained by a palaeontologist must monitor during excavations,	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the EMP.

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
16.5	to ensure protection of these deposits from disturbance. High volume excavation of the Kirkwood Formation and of the Sundays River Formation must be examined and sampled by a professional palaeontologist soon after bedrock exposure.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)
16.6	A two-grave cemetery, belonging to the Du Piesanie's family, was identified in zone 5. No development may occur within 20m from the perimeter of the fence.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted.
16.7	Zone 8 Deeper (> 2 m) excavations in the Cretaceous Uitenhage Group and in the Late Caenozoic Algoa Group must be monitored by an ECO trained by a palaeontologist for the possible presence of fossil heritage.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)
16.8	Zone 9 Two sensitive palaeontological sites were identified: an abandoned clay quarry and an active limestone quarry, The eastern face of the clay quarry and the faces of the limestone quarries must be safeguarded and preserved, including the	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted.



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
16.9	<p>large blocks at the western end of the limestone quarry.</p> <p>Zone 9 High volume excavation of the Sundays River Formation must be examined and sampled by a professional palaeontologist soon after bedrock exposure.</p>	<p>Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA</p>	<p>Email, 12 March2013</p>	<p>CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)</p>
16.10	<p>Zone 9 One cemetery with a community plaque is also located on zone 9. No development may occur within 20m from the perimeter of the fence.</p>	<p>Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA</p>	<p>Email, 12 March2013</p>	<p>CSIR: comment noted. These graves will unfortunately be affected by the proposed project layout (doubling of the railway line). PGS Grave Solutions is currently undertaking a detailed survey to identify the exact location and number of graves that may need to be relocated as part of this project. A grave relocation plan will be developed in accordance with the requirements of the heritage authorities.</p>
16.11	<p>Zone 11 Higher concentration of stone tools in areas around dry pans and wetlands must be recorded before destruction. After this, a report must be sent to SAHRA and the developer may apply for a destruction permit for the sites.</p>	<p>Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA</p>	<p>Email, 12 March2013</p>	<p>CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)</p>
16.12	<p>Zone 11 Any excavations in the Salnova Formation must be examined and sampled by a professional palaeontologist soon after bedrock exposure</p>	<p>Mariagrazia Galimberti Heritage Officer Archaeology,</p>	<p>Email, 12 March2013</p>	<p>CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)</p>

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
		Palaeontology and Meteorites Unit, SAHRA		
16.13	Zone 13 An archaeologist needs to be present on site during vegetation clearing of selected (by an archaeologist) strips. Small machineries or the least invasive methodology is required for these strips. If vegetation clearing results in the discovery of sensitive material, then monitoring during excavation, or a Phase 2 mitigation according to the situation, will also be required. After vegetation clearing a report must be sent to SAHRA for review and guidance on the way forward.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)
16.14	Zone 13 At Tossies Quarry South, the excellent exposure of contact between the Alexandria and the Sundays River Formations must be preserved to ensure that the contact is kept for future research.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)
16.15	Zone 13 The richly fossiliferous area recorded in the erosion gully North of the Tossies Quarry North must be protected from disturbance and development, therefore a palaeontologist or an ECO trained by a palaeontologist, must monitor the excavations.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
16.16	Zone 13 Any excavations in the Salnova formation must be examined and sampled by a professional palaeontologist soon after bedrock exposure.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)
16.17	Zone 13 No development may occur within 20m from the fence around the cemetery close to the railway.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	These graves will unfortunately be affected by the proposed project layout (doubling of the railway line). PGS Grave Solutions is currently undertaking a detailed survey to identify the exact location and number of graves that may need to be relocated as part of this project. A grave relocation plan will be developed in accordance with the requirements of the heritage authorities.
16.18	If any new evidence of archaeological sites or remains (e.g., remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, marine shell and charcoal/ash concentrations), unmarked human burials, fossils or other categories of heritage resources are found during mining activities, the Eastern Cape Provincial Heritage Resources Agency (Mr Sello Mokhanya, Tel: 043 642 2811) must be alerted immediately, and an accredited professional archaeologist must be contacted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted. This recommendation has been included in the Heritage resources report (Refer to Chapter 14)



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
16.19	of archaeological or palaeontological significance a Phase 2 rescue operation might be necessary. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted.
16.20	If any heritage resources, including graves or human remains are encountered they must be reported to SAHRA immediately.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted.
16.21	SAHRA reserves the right to request additional information as required.	Mariagrazia Galimberti Heritage Officer Archaeology, Palaeontology and Meteorites Unit, SAHRA	Email, 12 March2013	CSIR: comment noted.

17. Impacts on agricultural land

NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
----	---------------	-------------	------	----------



NO	ISSUES RAISED	COMMENTATOR	DATE	RESPONSE
Issues identified after the release of the Final Scoping Report and the responses thereto. (sent by CSIR to DEA on 9 October 2012)				
17.1	Page3-4: First Paragraph: What is DAFF's opinion of subdividing a piece of Tankatara for industrial development as it is also a dairy farm?	Alan Southwood, Environmental Officer, Specialised Production, Environmental Affairs, Cacadu Region	Email and letter, 13Sep2012	CSIR: CSIR has not received any objection from DAFF with regard to the proposed development (refer to attached letter)
17.2	This serves as confirmation of receipt of the documents sent to our offices by courier on Friday 31/02/2012. However when I checked on the system our department has already made comments with regards to the EIA application submitted and I have attached a copy of the letter with our departments decision for your ease of reference. With reference to the above-mentioned matter, this Department has no objection to the proposed development. This letter does not exempt any person from any provision of any other law and does not purport to interfere with the rights of any person who may	Thoko Buthelezi Agriland Support Group and Ms Marubini, Delegate of the Minister: Land Use and Soil Management	Email, 3 Sep2012 and letter 30 Aug2012	CSIR: comment noted



have an interest in the Agricultural land.