

APPENDIX D: COMMENT AND RESPONSE REPORT

APPENDIX D: COMMENTS AND RESPONSE REPORT OF ISSUES RAISED TO DATE AND RESPONSES BY THE PROJECT TEAM

Note: Comments received from the review of the scoping report are written in blue text.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Procedural issues			
Objections to the project	An objection is raised towards the proposed mining.	Abrie Landman & Johan Landman (Landowners), meeting, 06/11/2014	Your objection to the project is noted for the decision making authorities.
	One of the proposed access routes goes through my farm and I am completely against this project.	Johan Landman (Landowner and Farmer) Public scoping meeting, 26/03/2015	
	In principle we are opposed to the proposed project. Initial studies show that the proposed project area is highly sensitive. It would be a good gesture if the areas surrounding the proposed project site could be formally declared. However, for us as key stakeholder to reconsider our objection to the project we would need to be 100% convinced and guaranteed that the proposed project would not impact on the environment which will be a massive challenge. I don't see how you will get around some of these obstacles.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Your objection to the project is noted for the decision making authorities.
	We are downstream users of the Pongola River. If we don't stop mining now then mines will just start to develop everywhere. In terms of the use of fertilisers by farmers, yes 30 years ago DDT was used which was harmful to the environment. This has changed; fertilisers are now environmentally friendly as they are biodegradable. In terms of land that is being proclaimed, it needs to be noted that people's views have changed and farmers want to protect their land. Further to this, it must be noted that similar to the Pongola Water Users Association I am against mining upstream and downstream of the Pongola River.	Karsten Hinze, Biodiversity meeting, 18/08/2014	Your objection to the project is noted for the decision making authorities.
	Just for the record, we acknowledge that mining is important, however due to the sensitivity of this area we don't support the project. We need to convince the DMR not to accept this project. At what stage would we do this?	Unknown IAP, Biodiversity meeting, 18/08/2014	Your comment is noted for the decision making authorities. All comments received from IAPs throughout the environmental assessment process are collated into this comments and response report which will be submitted to the decision-making authorities for consideration.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Objections to the project	<p>Mpumalanga Tourism and Parks Agency has an objection to the Scoping Report for the proposal to mine coal on the abovementioned farm and in particular is concerned about:</p> <ol style="list-style-type: none"> 1. According to the Ezemvelo KZN Wildlife provincial conservation plan the site of the proposed project lies in a Biodiversity conservation priority 1 area. Conservation and wise land use options are deemed to be necessary to ensure protection of biodiversity, environmental sustainability, and human well-being, and are to remain unaltered. Therefore no form of mining or development is permitted on those high risk areas (Mining and Biodiversity, 2014). 2. Preliminary studies as indicated in the Scoping report (Scientific Aquatic Services CC (SAS, 2013)) indicates species richness of both protected plants, avifauna and fish species. These High altitude grasslands are regarded as very sensitive ecosystems, together with numerous wetlands and streams they provide essential ecosystem services 3. The project area is located in phase 3 of the SANBI upper Pongola biodiversity stewardship initiative focal area. WWF-SA a strategic partner of MTPA, Ezemvelo KZN Wildlife and SANBI serves as the implementing agency that is working towards the declaration of a formal Protected Environment in order to reach National conservation targets for the highly endangered Grasslands biome in South Africa. 4. Mining and in this case underground coal mining and its associated infrastructure (Discard dumps, pollution controm dams, washing plants, water purification plants and access roads) is not compatible with the current and future land use planning objectives in that it will not contribute to sustainable living and long term socio-economic upliftment. The sensitive environment will be degraded and polluted. The cost/benefit analysis of coal mines in Biodiversity priority 1 areas from research that is available indicates that such a proposal in such an area is not feasible. 	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	Your objection to the project is noted for the decision making authorities.

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Objections to the project	<p>Objection continued: 5. This ecological sensitive area should be managed to prevent pollution of the water resources because of the pollutions negative economical impact on downstream users. If underground coal mining would be allowed it might be impossible for the mining company to prevent pollution through Acid mine drainage and AMD decanting at downhill points. The Pandana River classified as a Class A river, flows through the centre of the project area. This river is fed by the surrounding grasslands through rocky outcrops (preferential recharge areas, and seepage wetlands). Polluted groundwater if not constantly pumped and purified and released into the wetlands and river will keep on decanting dirty water into the surrounding environment and river for more than a hundred years after mining has ceased. The costs of pumping and purifying the dirty water will exceed the short term benefit of the coal. The liability for the purification of the water will become that of the Taxpayer when the mine is abandoned by the mining company after decommissioning because the costs to rehabilitate will exceed the income from the coal. The precautionary principle of the sustainable development should be applied in such a high risk for mining area.</p>	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	Your objection to the project is noted for the decision making authorities.
	On behalf of the owner, Dr. L. A. Snijders, of both Tiverton No. 4, a neighbouring farm to Commissiekraal and Drift No. 17072/2 and 17072/3, a neighbouring farm of Commissiekraal; I formally oppose the issue of a mining licence on Commissiekraal;	J. P Snijders, Scoping report comments, 22/05/2015	Your objection to the project is noted for the decision making authorities.
	As a tenant and land user on neighbouring Tiverton, I personally oppose the issue of a mining licence on Commissiekraal.	J. P Snijders, Scoping report comments, 22/05/2015	Your objection to the project is noted for the decision making authorities.
Project Support	This project will create job opportunities in the area and will also develop the infrastructure in the area.	L. V Sibeko, IAP response form, 26/03/2015	Your positive comment is noted for the decision-making authorities.
	I support the proposed project because the community will benefit from the mine	Sindisiwe Zwane, IAP response form, 26/03/2015	
	I support the proposed project.	Sizwe Vundla and Manzana, IAP response forms, 26/03/2015	Your positive comment is noted for the decision-making authorities.

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Appointed consultant	In our experience, mining houses have changed consultants if the initial consultant's findings were not favourable and the original reports were lost. I am not saying that this will happen however Tholie Logistics needs to stick with SLR throughout the environmental assessment process.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Your comment is noted. Tholie Logistics has appointed SLR to conduct the environmental assessment process for this project.
	What is your role in this process?	Jean-Pierre Sniijders, Landowner notification meeting, 02/12/2014	SLR is the independent environmental consultancy that has been appointed by Tholie Logistics to conduct the environmental impact assessment for the project and facilitate the public consultation process.
Independence	Is SLR independent? Who pays you? If the project shouldn't go ahead will you say so?	Johan Kemp Public Scoping meeting, 26/03/2015	SLR is an independent environmental consultancy company which undertakes environmental impact assessment processes. SLR has been appointed by Tholie Logistics to conduct the environmental authorisation process as this is the mechanism provided for in South Africa. SLR is objective and will conduct its services accordingly.
Application processes	Can anyone apply for the prospecting right over Klipplaatdrift if the right has lapsed?	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Yes
	The prospecting right on Commiessiekraal for the proposed project expired in June 2013 therefore an application for a mining right could not be valid.	Jean-Pierre Sniijders, Landowner notification meeting, 02/12/2014	SLR's understanding of the law indicates that an application for a mining right can be submitted by an applicant regardless of the status of the prospecting right, unless the area under question is part of someone else's prospecting right.
	Section1: Methodology applied to scoping report acknowledges the Water Use Authorisation as being amongst the Environmental Authorisations required from key government departments. This office notes that statement with appreciation. However, the actual water uses that need to be applied for will need to be relooked at during that stage.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	The Department's comment is noted. Applicable water uses as they relate to the final project plan have been identified in the EIA report.
	Although the scoping report states that labour will be sourced locally and will commute from towns in the area, this office suspects that at least some residential development will be required. The remoteness of the mine will make this inevitable. Detailed plans for any new residential development must be submitted to this municipality for approval.	Amajuba District Municipality, Scoping Report comments, 10/06/2015	The Municipality's comment is noted. Should any residential development be required, the necessary approvals will be sought.

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EIA process	<p>Angus did mention how we appreciate what SLR has done today. We understand that Tholie Logistics wants to mine and will do anything to achieve this objective. We as IAPs don't want mining. As part of the EIA process can a checklist be compiled on how this process is progressing so that if Tholie Logistics tries to convince us otherwise then we can derail the process. If we find that there is no justification for the mine then it must be accepted. If we can be convinced that the problems can be mitigated then we might accept. You can argue that you have the best intentions but when your lawyer gets involved there will be problems. This is not going to be an easy process because we want to ensure that the area is protected for the future.</p>	<p>Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014</p>	<p>The objective of the EIA is to put forward the proponent's plan, assess the potential negative and positive impacts associated with the plan, provide input in project planning in order to minimise impacts and develop practical management and mitigation measures with the input of experience and qualified specialists. Stakeholder engagement is an integral part of the EIA process which is used to help identify potential impacts and provides an opportunity for interested and affected persons to ask questions and raise concerns. These issues and concerns raised by stakeholders are used to provide input into the scope of the impact assessments to be conducted. The results of the specialist studies are included in the EIA and EMP report. This draft report is made available for stakeholders to review and comment on. All comments received throughout the EIA process and review of the scoping and EIA and EMP reports will be included in the final report to be submitted to the regulatory authorities for review and decision making.</p>
	<p>How long is the environmental assessment process?</p>	<p>Christine Meyer (executor of estate Commieskraal 90HT ptn 3) meeting, 06/11/2014</p>	<p>In the normal course, an environmental assessment process can take between 18 and 24 months to complete. This does not include any secondary approvals that may be needed for the project.</p>
	<p>It was mentioned that the mining right would be submitted at the end of the year? Is there still going to be an EIA process?</p>	<p>Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014</p>	<p>Yes</p>
	<p>What effect can the EIA and EMP report have on the decision making process by the departments? Do the departments read these reports? Can an EIA process stop the granting of a mining right?</p>	<p>Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014</p>	<p>The EIA and EMP report is a collation and assessment of information collected during the environmental assessment process. The quality of the EIA and EMP report is dependent on the quality of the environmental assessment process and associated tasks. It is SLR's understanding that the Departments do read the EIA and EMP reports in order to provide comments and to make decisions. A department can issue a negative decision if justified.</p>
	<p>Does the department have the capacity to prevent projects to commence?</p>	<p>Christine Meyer (executor of estate Commieskraal 90HT ptn 3) meeting, 06/11/2015</p>	
	<p>The departments do not care about farmers. We will only be victimized.</p>	<p>Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014</p>	<p>This comment is included for consideration by decision-making authorities.</p>
	<p>The EIA and EMP report will be the document that we will be assessing and our complaints will be recorded in.</p>	<p>Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014</p>	<p>The EIA and EMP report is the document that will be used by decision-making authorities to inform a decision on the project. IAPs will have an opportunity to review and comment on both the scoping and EIA and EMP reports.</p>

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	The timeframe is very short. Will the specialist studies be completed in the proposed time?	Johan Boonzaaier (Impala Water Users Association) Public scoping meeting, 26/03/2015	The baseline biodiversity studies have already been conducted, as these take the longest. The remaining specialist studies were planned, at that time, to be completed in the three months following the meeting.
EIA process	The Department of Agriculture, Forestry and Fisheries (DAFF) appreciates the opportunity given to review and comment on the Draft Scoping Report (DSR) dated 10 April 2015 (received by this Department on the 10th April 2015) for the above mentioned project. DAFF is the authority mandated to regulate activities affecting natural forests and tree species protected in terms of the National Forests Act, 1998 (Act No. 84 of 1998)	Department of Agriculture Forestry and Fisheries - KZN, comments for scoping report, 29/04/2015	Your area of responsibility is noted for the record.
	This does not constitute DAFF's final comment, final comments will be provided upon receipt and review of the EIA Report together with the Forest Specialist Report.	Department of Agriculture Forestry and Fisheries - KZN, comments for scoping report, 29/04/2015	Your comment is noted. In a similar manner as the scoping report a copy of the EIA report will be forwarded to the department for review when completed. We look forward to receiving further comments then.
	Reference is made to the Scoping Report (SR) with reference (Ref No.: KZN30/5/1/2/2/10061MR), dated April 2015 and received by the Department of Water and Sanitation (Department) on the 17 April 2015. As this is a Scoping Report the applicant is required to submit a copy of all the report(s) for subsequent stages of this environmental assessment to this Office for review and comments.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	
	The applicant is further advised that these comments and/or concerns have been compiled based on only the available information in this Environmental Scoping Report. This office requested a site inspection early in April 2015 but the applicant and consultant have not yet responded. It should be noted that this office reserves the right to append or withdraw other comments and/or concerns should further details surface during the course of this environmental assesment.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Your comment is noted. A regulatory authorities site meeting was arranged but the Department was unable to attend. Arrangements will be made to accommodate the Department at a future date if required. We look forward to receiving further comments then.
Plan of study	As the authority mandated to conserve biodiversity in KwaZulu-Natal, Ezemvelo does not object to the proposal under consideration. The plan of study is supported by Ezemvelo.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	Your comment is noted.
	It is our opinion that this Scoping Report is very basic regarding addressing our concerns. It does not provide sufficient information to evaluate its sound and safe practices, but rather merely solicits further raising of insufficiently addressed and unaddressed concerns.	Impala Water Users Association, Scoping Report comments, 22/05/2015	At the scoping stage it is not possible to provide detailed responses to any environmental or social issues as specialist studies as per the terms of reference included in the scoping report still need to be completed. Key in the scoping report is agreement on the terms of reference for further work to address potential impacts and comments.

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	The EMPr must be detailed with realistic mitigation measures and the positive impacts explored must be enhanced.	Department of Economic Development, Tourism and Environmental Affairs, 27/07/2015	These comments have been taken into account in the compilation of the EMP. All identified positive and negative impacts have been assessed and discussed in detail and fully detailed management plans are provided for all impacts. These management plans are aimed at preventing and minimising potential negative and enhancing positive impacts.
Mapping	The applicant is required to submit Figure 2: Local setting of project area on at least A3 sized paper.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Noted. The Department will be provided with the requested copies. These comments have been taken into consideration for the EIA and EMP report.
	An additional map zooming into the actual project area will be appreciated.		
	The applicant is required to submit bigger (at least A3 sized) figures (for example, in Appendix 2 Figure 1: Mining and biodiversity guidelines, Figure 2: Threatened ecosystems, Figure 3: NFEPA wetlands, KZN C-plan. The ones supplied do not facilitate the decision-making process.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	
Potential environmental impacts	Based on our experience with historical mines in the area, mines are associated with bad environmental issues.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	All identified positive and negative impacts have been assessed and discussed in detail and fully detailed management plans are provided for all impacts in the EIA and EMP report. These management plans are aimed at preventing and minimising potential negative and enhancing positive impacts.
	The current SLR scope of environmental impacts omits or misrepresents significant effects on neighbouring land, water and environmental rights	J. P Snijders, Scoping report comments, 22/05/2015	Your comment is noted. The scoping report identified a list of potential impacts that could occur as a result of the project. This list of potential impacts has been updated in the EIA through the involvement of specialist studies. The specialist work has informed the nature and extent of potential impacts both on the project site and in the surrounding area .
	Because environmental impacts are under-reported, proposed abatement and remedial measures will be grossly inadequate	J. P Snijders, Scoping report comments, 22/05/2015	All abatement and/or remedial measures have been informed by the specialist studies completed by independent, qualified specialists and the technical project team.
	All environmental impacts and damage, and all social impacts and damage expected to be caused by Tholie's proposed mine are expected to be borne by the communities of Dumbe and Emadlangeni, other communities who use the proposed polluted downstream water resources, and the communities relying on environmental tourism in those communities and the neighbouring Pixley kalsaka Seme Municipality	J. P Snijders, Scoping report comments, 22/05/2015	Your comment is noted. The spatial extent of the project's potential impacts has been informed by the various specialist studies conducted as part of the EIA. Potential impacts on water, land users and the closest residential dwellings and communities have been assessed in the EIA and EMP, with detailed management and mitigation measures provided. These impact assessment have been informed by independant and qualified specialists in their fields.
	We regard mining impact to be cumulative and have negative effects for many years after closure. Empirical proof of this phenomenon is especially visible and detectable in the Paulpietersburg area. It is stated herewith that this state of affairs is unacceptable for this generation of IAP's, as well as to leave a repeat of similar conditions to future generations.	Impala Water Users Association, Scoping Report comments, 22-05-2015	Your comment is noted. Cumulative and closure related aspects of all potential impacts have been included in the EIA and EMP report. In addition, rehabilitaiton closure objectives have been set and include rehabilitaiton of the mine site to be suitable for relevant end land use, in this case limited agriculture and residential use.

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Consultation process	Will you still consult with other farmers? There will be an impact with socio-economics in the area.	Johann Hiestermann (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	As part of the environmental assessment process, interested and affected parties (IAPs) have been identified and engaged during the consultation process. This included farmers, landowners and land users living in the area. This is outlined in the stakeholder engagement section of the report.
	Even though we are key stakeholders, we do not live in the area. A meeting with people who live in the area needs to be undertaken because at the end of the day these IAPs will live with the outcome of the project.	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	
	We are happy that SLR is running the environmental assessment process. Today's workshop has been open and transparent. We appreciate that key stakeholders have been taken on board early in the process even before the mining right has been submitted. This is the correct approach.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Your positive comment is noted.
	Mpumalanga Parks Board should be involved in the EIA process due to trans-boundary issues.	Biodiversity meeting, 18/08/2014	Mpumalanga Parks Board has been registered as an IAP on the project database.
	Mr JP Snijders agrees to be main contact person between SLR and Dr Snijders and the tenants living on the farm.	Jean-Pierre Snijders, Landowner notification meeting, 02/12/2014	This is noted.
	This landowner notification meeting is not considered consultation until enough information and detail with regards to the proposed project is received.	Jean-Pierre Snijders, Landowner notification meeting, 02/12/2014	The meeting referred to is part of the landowner notification process. A record of the consultation process for the EIA is outlined in the stakeholder engagement section of the EIA and EMP report. All registered stakeholders will have the opportunity to review the draft EIA and EMP report and all comments received will be submitted to the regulatory authorities in the final document for review and decision making.
	We object to the delayed notice with reference to your notice on page 5, "Steps in the Authorisation Process". This delay will have a potential bumper effect on the balance of the above mention process and schedule that will be to the detriment of the IAP's.	Johan Boonzaier (Impala Water Users Association), IAP response form, 23/03/2015	The NEMA and MPRDA applications were submitted in November 2014 and accepted in December 2014 (NEMA) and 29 January 2015 (MPRDA), respectively. Until such time as the MPRDA application was accepted, SLR was not in a position to formally engage in a public consultation process. Once the MPRDA application was accepted, SLR sent a 'save-the-date' email to identified IAPs on 6 February 2015 to ensure sufficient notification time was given for the scoping meetings. This has not affected the notification and review periods for IAPs.
	When will the EIA be completed?	Pat Collins (Utrecht Municipality) Public scoping meeting, 26/03/2015	At the time of the comment it was anticipated that the EIA would be completed in June 2015 with feedback meetings planned for July 2015. Due to specialist work, the completion date for the EIA was extended to mid October 2015. IAPs have been notified of the date for feedback meetings.
When will the EIA phase start and how long would it take for SLR to report back to the community?	Zandile Mashazi, Public scoping meeting, 26/03/2015		

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Consultation process	The review period of 40 days. Is this calendar or working days?	Johan Boonzaaier (Impala Water Users Association) Public scoping meeting, 26/03/2015	The review period is calendar days.
	The biodiversity is very rich in the area especially the importance of birds. Wakkerstroom is recognized as a protected bird area. Is birdlife SA involved in this process?	Ayanda Nzimande (WWF SA) Public scoping meeting, 26/03/2015	Yes, Birdlife SA is registered on the project IAP database.
	Once the specialist investigations are completed, will SLR report back to the community because this never happens with past mining project experience?	P. J Msibi, Public scoping meeting, 26/03/2015	Yes, a feedback meeting will be held to report back to the community after the specialist studies and EIA report have been completed. The draft EIA and EMP will also be made available for stakeholder review.
	How will the reports be distributed?	P. J Msibi, Public scoping meeting, 26/03/2015	Hardcopy English reports will be left at venues agreed to during the public scoping meetings; these include the Luthilunye Public School, Kemps Lust and Utrecht Public Library. Summaries of the report will be made available in English, Zulu and Afrikaans. These will be distributed by email and/or post. Some will be left at the school for distribution to the parents via the children.
	The traditional council should also be involved with the process.	Bhekinkosi Zwane (Chief), Public scoping meeting, 26/03/2015	Thank you. Please provide the contact details of the traditional council.
	SLR shouldn't register anyone as Chiefs before checking with COGTA.	Chief Mabaso, Public scoping meeting, 26/03/2015	SLR consulted with COGTA to confirm the Chiefs relevant to the project area. Further detail on the chiefs relevant to the project area and proof of consultation with COGTA is included in Appendix C of the EIA and EMP report.
	The municipality should hire a tent for the feedback meetings.		Thank you for your suggestion.
	This community falls under the eMadlangeni local municipality but why is the eDumbe municipality at this meeting?	Ushumayo Ndebe, Public scoping meeting, 26/03/2015	eDumbe is attending the public scoping meeting as an interested party.
	Is the WWF part of this process?	Johan Kemp, IAP response form, 26/03/2015	Yes, WWF is registered on the project IAP database (see Appendix B of the EIA and EMP report).
	We as AfriForum, a NFO, are representing more than 300 members who provided us with a mandate to provide input and to monitor this application and environmental process.	Julius Kleynhans, IAP response form, 26/03/2015	Your comment and representation noted.
Has tourism businesses in the area been consulted?		The impacts on land use both within the Commissiekraal farm and immediate surrounds have been considered. The results of this impact assessment is provided in the land use impact assessment section of the EIA and EMP, and a management plan has been provided to mitigate all land use impacts.	
Is tourism being considered in this EIA? I haven't heard or seen anything mentioned about tourism and this area is a great tourist attraction.	Julius Kleynhans (Afri Forum) Public scoping meetings, 26/03/2015		

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Consultation process	We confirm that the Impala Water Users Association represents jointly the views of the following registered IAPs: 1. Impala Water Users Association 2. Greater Pongola River Catchment Protection Association 3. Affected landowners in the Paulpietersburg/Comondale area Background information on each of these groups is included in the original comment included in Appendix B of the scoping report.	Impala Water Users Association, Scoping Report comments, 22/05/2015	Your representation has been recorded. Thank you for providing background information and context for each of these groups. We note the importance of the catchment in relation to water supply.
	Comments received from KZN Wildlife, Water and Sanitation, Agriculture forestry and fisheries, AMAFA Kwazulu Natal, Mpumalanga Tourism and Parks Agency and Amajuba District must be addressed in the Environmental Impact Assessment Report (EIAR)	Department of Economic Development, Tourism and Environmental Affairs, 27/07/2015	These comments have been included in this issues and response report and addressed in the EIA where required.
	The Department has noted that 5.5 MVA of power will be sourced from generators on site until Eskom supply is installed. Should the power be supplied by Eskom, comments from Eskom must also be included in the EIAR.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	Eskom have been registered as an IAP on the database (refer to Appenidx B of the EIA and EMP report) and have received all relevant stakeholder information sharing documents. Eskom has not yet been approached in terms of providing power to the project but any additional power infrastucture that triggers listed activities or any other authorisation requirements will need to be assessed in a separate process and does not form part of the scope of this EIA.
	It is indicated that there were vulnerable bird species identified on site. Therefore, the applicant must communicate with Bird Life South Africa. Comments from Birdlife South Africa must be included in the EIAR	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	Birdlife South Africa have been registered as an IAP on the database (refer to Appenidx B of the EIA and EMP report) and have received all relevant stakeholder information sharing documents. However no comments have been received from Birdlife South Africa on the project to date.
Appeal process	Does this imply that the better the EIA document the better we as stakeholders can assess it? And use it to object against the project?	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	Yes
	If we appeal, can the mining commence while discussions are being undertaken?	Nel Marie Mahne & Johan Mahne (landowner), meeting, 07/11/2014	In terms of the law, no mining can take place if an appeal process is underway.
Regulations and law enforcement	I have limitations on my land use. I am not allowed to plant timber on my farm as this will affect water users downstream. We all have to abide to rules and regulations. Are there enough rules and regulations in place in terms of mining? We have had bad experiences with mining companies. Mines make their profits and leave and the impacts of the mine's decisions affect generations later and it is critical that this is taken into consideration.	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	There are environmental rules and regulations in place. Most include obtaining the necessary authorisations and licenses. Auditing also takes place to measure an operations compliance with the conditions of licenses. SLR has also noted an increase in site inspections by the key departments (Department of Water Affairs, Department of Environmental Affairs and the Department of Mineral Resources) to verify that these conditions are being met. If the conditions of the licenses are not met, directives can be issued and if these directives are not addressed the possibility that the mine can be suspended or shut down is real.

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	Enforcement is generally lacking in the DMR. It is more likely that a mine is stopped for health and safety reasons rather than environmental reasons. What I would like to see is that Tholie Logistics adopts this approach toward mining and self regulates so that getting the departments involved would not be necessary. I agree that there has been some improvement by the DMR regarding the enforcement of rules and regulations however the enforcement of rules and regulations is more noticeable from the green scorpions rather than the DMR.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Your comment is noted.
Social Responsibility	It is a preliminary study. It is a social responsibility of the mine to determine the requirements of the community before anything goes forward.	Pat Collins (Utrecht Municipality), Public scoping meeting, 26/03/2015	Thank you. Your comments are noted.
Specialist studies	We wish a detailed description of the cross section of the geological rock formation layers, a soil survey report and the hydrological status in the area with reference to ground water and surface natural water courses.	Johan Boonzaaier (Impala Water Users Association), IAP response form, 23/03/2015	An understanding of the geological rock formations has been provided as part of the groundwater study. Soil and hydrological studies have been completed and the results of these studies are provided in the EIA and EMP report. In this respect detailed baseline information, impact assessment and management plans are provided in the relevant rpeort sections.
	There must be a detailed description of each aspect of the project and its capacity and location.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	A detailed project description is included in Section 3 of the report.
	The applicant must assess the impacts and mitigation measures of each aspect of the proposed development including the following: <ul style="list-style-type: none"> - Crushing and screening plant - The wash plant - Diesel storage tanks - Sewage/package plant - Stockpiles of coal - Stockpiles of topsoil, subsoil and the waste rocks - The boxcut area - Roads and bridges - Dams 	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	All aspects of the proposed project in terms of surface and underground infrastucture and activities have been fully assessed with specialist input. In this respect the impact assessment sections (chapter 8 of the EIA and EMP report) address each impact in individual sections which includes a table identifying exatly what activities of the proposed project could result in that potential impact. Management and mitigation plans are provided for each impact in chapter 20 of the EIA and EMP report and again identify which project activities relate to each potential impact and management pan.
	The detailed technical civil services study for electricity, sewage and water must be included in the EIAR.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	All available information is provided in the project description of the EIA and EMP report. Detailed designs and finalisation of service provision contracts such as power and water supply will be developed after the submission of the EIA and EMP report.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
	The Department has noted that the applicant is intending to store hazardous substances within the project area. Precaution and safety measures must be taken, therefore the applicant must include a spill and emergency management plan in the EIAR.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	A spill and emergency management plan have been included in the EIA report (see Section 21 of the EIA and EMP report).
	The socio-economic study must also indicate the risks, impacts and measures associated with the workers and the community.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	The EIA focused on third parties only and did not assess health and safety impacts on workers because the assumption was made that these aspects are separately regulated by health and safety legislation, policies and standards. Potential impacts on the health of residential receptors within the mine's zone of influence have however been addressed in the socio-economic impact assessment, as well as in the water and air quality impact assessments provided in chapter 8 of the EIA and EMP report. Noise impacts were also assessed with respect to third parties.
Technical issues			
Applicant details	Who is Commieskraal Coal?	Abrie Landman & Johan Landman (landowners), meeting, 06/11/2014	Commissiekraal Coal held prospecting rights over a portion of the farm Commissiekraal 90HT. The prospecting right was transferred to Tholie Logistics in terms of the Mineral and Petroleum Resources Development Act. The project that is the subject of this environmental assessment process is referred to as the Commissiekraal Coal project.
	Who is Tholie Logistics?	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Tholie Logistics is a coal prospecting company which was originally set-up by Mrs Tholie Cibane. Bright Resources became the operational and financial partner to Tholie Logistics, through "earning into" her projects by contributing finance and expertise. Tholie is a Natal entrepreneur and she is involved in a variety of businesses, with a focus on mining, especially coal mining.
	What is the relationship between Tholie Logistics and Vince Mining?	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Tholie Logistics held two prospecting rights, namely the Commissiekraal Coal and Tholie Logistics prospecting rights. The Commissiekraal right was consolidated into the Tholie Logistics right through a Section 102 process. Vince Mining held prospecting rights on the farm Klipplaatdrift. Interactions between Vince Mining and Tholie Logistics did take place as there was a possibility that Tholie Logistics would potentially take over the Klipplaatdrift project. Based on the findings of assessments undertaken for Tholie Logistics this did not happen. The prospecting right held by Vince Mining over the farm Klipplaatdrift has subsequently lapsed and Tholie Logistics holds no interest over this area.
	Is there a connection between the fracking companies and Tholie Logistics?	Nel Marie Mahne & Johan Mahne (landowner), meeting, 07/11/2014	No, Tholie Logistics has no interest in fracking.
	Tholie is misrepresented as a 'junior miner'; when it has in fact never been a South African coal miner of any type.	J. P Snijders, Scoping report comments, 22/05/2015	The scoping report makes reference to Tholie as a junior exploration and mining company, which it believes is an accurate reflection of the company at this stage.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Motivation for the project	A lot of money is needed to build a mine in an area with no infrastructure and especially when the deposit is so isolated. What is in it for the mine?	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2021	Tholie Logistics believes the ore body on Commieskraal is feasible and worth developing. Furthermore, the anticipated market prices in the medium and long-term are considered by Tholie Logistics to be favourable for project development.
	We would like know why this deposit is so important, can this information be supplied at scoping meetings.		
	How will you justify mining in an area that is natural wilderness? We understand why the proposed project site is the targeted area and why mining is important and we can accept that you will do anything possible to get the mining right.	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	
	It seems that the area is ecologically pristine with protected species, why consider this development?	Julius Kleynhans, IAP response form, 26/03/2015	
	From the point of a private organisation participating in the flow of modern day economics, the primary purpose is that of economic wealth and shareholder value. The supply to ESKOM and export of coal are put up in this Scoping Report as motivation, with a further basis of job opportunities and unspecified provisions in the IDP's of the Amajuba/eMahlangueni municipality and National Government. However, the sensitivity of the headwater of the pristine Pongola river Catchment is in the very long term, critical for a very large number of different communities and livelihoods, especially where some are totally dependent on the natural surface water resource. We herein call upon the moral duty of environmental consultants, mining houses and other role players in the well described judgments of two important court cases, namely, BP Southern Africa (Pty) Ltd v MEC for Agriculture, Conservation and Land Affairs, 2004 5 SA 124 (WLD) and the Fuel Retailers Association of SA v Director General: Environmental Management, Dept of Agriculture, Conservation and Environment, Mpumalanga Province, 2007 6 SA (CC).	Impala Water Users Association, Scoping report comments, 22/05/2015	Although the main motivation for the project, as with any new development, is economic in nature, the project plan as presented in the EIA report has taken into consideration the findings of specialist work and has aimed to minimise the project footprint as far as practically possible by limiting both the mining methods employed and limiting the need for processing related components on site.
	The desirability of another coal mine. Is this mine in the National interest of SA or do a few individuals benefit? Are there no other areas with a less high risk for mining where coal can be mined?	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	The supply of coal to coal powered power stations is an important priority for South Africa due to the current energy crises. The EIA assessed all of the potential positive and negative impacts of the proposed project in chapter 8 of the EIA and EMP report. The overall conclusion of the study shows that all of the potential negative impacts can be mitigated to an acceptable level assuming the management plans are implemented effectively. Furthermore there are significant economic benefits expected with regard to the local, regional and national economy.

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	The need and desirability of the project must indicate if the proposed development is the best practicable environmental option for this site. The "best practicable environmental option" is the option that provides the most benefits and causes the least damage to the environment. The applicant must indicate why the location of this project would be desirable in this area rather than establishing in another area.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	The location of a mineable coal resource dictates the general position of the proposed mine. The needs and desirability of the project have been assessed and are described in chapter 1 of the EIA and EMP report. In this regard, alternatives have been selected which will minimise surface disturbance, water pollution sources and place surface infrastructure within less sensitive transformed grassland habitat.
Geological aspects	At what depth is the outcrop?	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Coal reserves occur at various depths across the farm from near surface to approximately 150m below ground.
	What are the black lines indicated on the drawing?	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	With reference to the map displayed at the meeting, the black lines indicate the presence of faults. The presence of faults will make mining more challenging.
	So there is a risk?		
	How was the coal quality determined?	Karsten Hinze (Comondale Farmers) Public scoping meeting, 26/03/2015	Through prospecting, Tholie Logistics was able to determine the coal quality using mineralogy studies which involved a series of test work.
	Do you have an assumption of how much pyrite there is in the area?	Julius Kleynhans (Afri Forum) Public scoping meetings, 26/03/2015	A geochemistry study has been completed for the project to understand the potential for acid generation and leaching of metals from project infrastructure and this was used to inform the groundwater pollution modelling study (seechapter 8 of th EIA and EMP report).
	Will the mining project cause seismic activity?	Ndumiso Ntuli, Public scoping meeting, 26/03/2015	The eastern part of South Africa is very stable in terms of seismic activity. There is a very small potential for seismic activity in this area. Due to the small scale of the mine, project activities are not expected to affect seismic activity in the area.
	The deeper you mine the higher the methane content. You mentioned that blasting is being considered. Has this been considered as it will lead to operational disasters.	J. P Snijders, Public scoping meeting, 26/03/2015	The Mine Health and Safety Act requires that the mine operator manages methane levels underground such that they do not pose a risk to the health and safety of mine workers. This is accomplished through the supply of adequate volumes of fresh air to dilute methane levels to well below the explosive range. The mine operator is required to regularly measure methane content in the air underground. Should this exceed acceptable levels, additional ventilation will be directed to the affected area. No blasting will be allowed if methane exceeds acceptable levels.

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Life of mine	What is the planned life of mine?	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	At the time of the scoping phase the life of mine was scheduled for 10 years, although a mining right of 20 years was applied for to allow for further exploration, development and optimisation of the mine and ore processing. The life of mine has been revised to address the 20 year mining right period. The EIA and EMP report covers the revised 20 year life of mine period.
	What is the life of the operation?	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	
	What is the lifespan of the mine?	Chris Buthelezi (eDumbe Municipality), Public scoping meeting, 26/03/2015	
Proposed operations	Once the ore reserve on the farm Commieskraal has been exploited could mining underground extend towards other farms?	Karsten Hinze, Biodiversity meeting, 18/08/2014, Biodiversity meeting, 18/08/2014	Mining can only take place in an area that forms part of a mining right.
	From a mining perspective Tholie Logistics wants this area to mine. We can accept that you will mine as much as possible in that area, in order to optimally utilise the proposed project area. What is the size of the proposed project area?	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	Approximately 2,000ha of the farm is underlain by coal reserves. The footprint of project infrastructure is anticipated at this stage to cover an area of approximately 14ha. (Refer to chapter 3 of the EIA and EMP report)
	Do you anticipate that the mining will be opencast?	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Current planning makes provision for underground mining only. Opencast mining has been assessed as a project alternative but was not determined to be the preferred alternative.
	If opencast mining had to occur where would it happen?		The more shallow ore reserves are located within the northern, central part of the project area.
	Previously we understood that the mine was considering open cast mining however I see now that underground mining is being considered, why the change?	Dawie Cronjé (Impala Water Users Association) Public scoping meeting, 26/03/2015	Open cast mining is no longer being considered. The project plan as presented is not the most economically viable plan but Tholie Logistics acknowledges that the area is sensitive and have therefore comprised by only considering underground mining.
	Will coal cleaning be undertaken on site and how will it take place?	Bradley Gibbons (Endangered Wildlife Trust), Biodiversity meeting, 18/08/2014	At this stage in project planning, a coal washing plant is not planned. Only a dry crush and screen plant is envisaged. Further detail is provided in Section 3 of the report.
	Where will the coal be washed?		
	Can various grades of coal be mixed together and still be acceptable for market standards?	J.P. Sniijders, Public scoping meeting, 26/03/2015	Yes, it is possible that the coal could be mixed to meet market requirements.
	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014		

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	In the information document it states that the mine area will expand for approximately 3000 hectares underground however the farm Commiesiekraal is not that big. Will they only be mining under Commiesiekraal?	J. P Snijders, Public scoping meeting, 26/03/2015	The applicant has applied for a mining right on the farm Commiesiekraal 90HT only. The underground mine extent is approximately 2000 hectares as outlined in the background information document.
	Is Tholie Logistics planning to do the mining themselves or will they sell to another company?	Johan Kemp, Public Scoping meeting, 26/03/2015	It could make sense to partner with another mining company in the future however at this stage Tholie Logistics is well prepared to do the mining themselves.
Proposed operations	How does the mine propose to handle the waste rock during construction?	Pat Collins (Utrecht Municipality), Public scoping meeting, 26/03/2015	Very little waste rock from the mine is anticipated as underground mining will be on the actual coal seam. Any overburden from the boxcut development will be used to create a platform for mine infrastructure and/or roads.
	As the mine will be trying to access coal from the box-cut, what is going to happen to all the waste rock? Will it be stockpiled and backfilled?	Chief Mabaso, Public scoping meeting, 26/03/2015	
	How will the waste rock from construction be managed?	Lungi Ndumo (eDumbe Local Municipality), Public scoping meeting, 26/03/2015	
	The statement that minimal waste rock will be produced is debatable. What is the expected volume ratio of overburden and soil / rock material, as waste, versus the volume needed for the boxcut? What would be the position if the waste exceeds the "boxcut" volume needs?	Impala Water Users Association, Scoping report comments, 22/05/2015	All waste rock produced will be used for terracing and road building. Should excess waste rock be generated, it would need to be stockpiled on site in the form of berms and positioned close to the boxcut to be used as backfill material. This is however not envisaged at this stage. Any deviation from the project plan will require an amendment to the EIA and EMP.
	What is a boxcut platform?	Impala Water Users Association, Scoping report comments, 22/05/2015	A boxcut platform is a levelled area created at the entrance to the boxcut that will be used for the placement of surface infrastructure.
	What assurance will be provided that all contractors would honour and comply to any waste management procedure set up by the Applicant.		Contractual agreements with contractors would need to include related conditions. The Applicant is responsible to ensure that sub contractors adhere to contractually agreed standards and practices and will ensure that subcontractors meet these. A related commitment has been included as a mitigation measure (see Section 20 of the report).
	What about operational accidents? The nearest hospital is nearly an hour away. How will the employees get medical attention?	J. P Snijders, Public scoping meeting, 26/03/2015	An emergency response plan is included in section 21 of the EIA and EMP report.
Water supply	How much water would the mine use per day and where will it be sourced from?	Julius Kleynhans, IAP response form, 26/03/2015	The mine will use all water removed from underground and all rainfall and runoff from areas designated as "dirty" in terms of the stormwater management plan. A small amount of make-up water will only be required during the dry season of the construction phase (approximately 400 cubic metres per month). Potable water will also be required and peak around 900 cubic metres required per month. The make-up and potable water will be sourced on site via boreholes of springs which been proven to have the required yield. These water uses will need to be authorised in terms of the National Water Act of 1998.

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	The intended water supply from Utrecht municipality is a highly impugnable issue. Clarity and detail about this issue is needed as well as an explanation of why a municipality would rather supply a mine with potable water than large number of rural communities.	Impala Water Users Association, Scoping Report comments, 22/05/2015	The municipality cannot provide the mine with the required make-up water and potable water. As described above, the mine will use all water removed from underground and all rainfall and runoff from areas designated as "dirty" in terms of the stormwater management plan. A small amount of make-up water will only be required during the dry season of the construction phase (approximately 400 cubic metres per month). Potable water will also be required and peak around 900 cubic metres required per month. The make-up and potable water will be sourced on site via boreholes of springs which have been proven to have the required yield. These water uses will need to be authorised in terms of the National Water Act of 1998.
Water supply	Table 3.1 in the Scoping report indicates a water demand of approximately 12, 500 m ³ per month. Source of such water as well as proof of its sustainability, including but not limited to, Service level Agreements between the project proponent and the service providers (Utrecht Municipality), adequacy of surface water resources to supply or augment the supply (natural spring), borehole yields (as these have been mentioned as likely sources as per section 3.1.4.5: water supply and management).	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	As described above, the mine will use all water removed from underground and all rainfall and runoff from areas designated as "dirty" in terms of the stormwater management plan. A small amount of make-up water will only be required during the dry season of the construction phase (approximately 400 cubic metres per month). Potable water will also be required and peak around 900 cubic metres required per month. The make-up and potable water will be sourced on site via boreholes of springs which have been proven to have the required yield. These water uses will need to be authorised in terms of the National Water Act of 1998.
	As previously stated, the natural water on this farm is of an exceptionally pure quality. More than adequate, potable water is available by simply enclosing the eye of one of the many springs in the area.	Amajuba District Municipality, Scoping Report Comments, 01/06/2015	Thank you for your input, this has been taken into account as part of assessing the water supply options.
Water management	MTPA recommends that a risk assessment is done which includes: ~ rehabilitation of discarded dumps, washing plant and dirty water evaporation dams and water pollution prevention strategies on long term ~ maintenance of water pollution prevention methods and equipment ~ brine control.	Mpumalanga Tourism and Parks Agency Scoping report comments, 25/05/2015	A water management plan addressing these aspects of the operation is included in the EIA report (see Section 20 of the report). Note: there is no provision for discard dumps or a washing plant in the current project plan.
	Activities 28 and 41 of Listing Notice , Regulation 544 (2010) refers to the expansion and/pr use of existing dams. The applicant is required to clarify if there are any dams already existing on site. If yes, kindly provide the number of dams on site, their location, whether they are instream or offstream dams, their existing capacities as well as their proposed capacities. Include these dams in the site layout plan.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	There is an existing farm dam (1) on site. The dam is located adjacent to the Pandana River. It appears to be an offstream dam. The existing capacity is unknown. There is no plan at this stage to use this dam for the project. Should this change the necessary approvals will need to be sought.

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	Reference is made to Activity 2 of Listing Notice 3, Regulation 546 (2010) which is meant for construction of reservoirs for bulk water supply but is justified as being applicable to the construction of pollution control dams. The applicant is required to clarify this confusion.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	The wording has been edited to read: " Water supply reservoirs located at the project site could exceed a capacity of 250 cubic metres. These facilities....."
Water management	The area is within a very good rainfall zone. Any underground works will encounter serious volumes of sub-terranean water which must be managed so as to avoid any expansion of the mines pollution footprint. The volumes of ground water expected will make treatment (de-salination, neutralisation of pH, removal of heavy metals etc) uneconomic and therefore unlikely. Commonly, water from underground is also used in the washing plant. The plan for this mine must, therefore, include an evaporation pond capable of holding the mine water, without any permeation or outflow.	Amajuba District Municipality, Scoping Report Comments, 01/06/2015	Your comment is noted. A water management plan addressing groundwater inflows is included in the EIA report (see Section 20 of the report). Note: there is no provision for a washing plant in the current project plan.
Water balance	<p>Table 3.1 in the Scoping report indicates a water demand of approximately 12, 500 m³ per month. The applicant is required to provide a detailed breakdown of this water demand.</p> <p>The applicant is to clarify the meaning of a "water supply reservoir" as referred to in section 3.1.5.5 as well as for the function mentioned i.e. control of storm water and for pollution prevention.</p> <p>The applicant is to clarify the meaning of "process water" as used in section 3.1.5.5 as well as elaborate on the process(es) that have a potential to generate such water and those that will use this process water.</p> <p>The applicant is to clarify the meaning of "make up water" as used in section 3.1.5.5 as well as elaborate on the process(es) that are likely to require this make up water.</p> <p>The applicant should elaborate on the process(es) that will generate water and those that will use recycled water as referred to in section 3.1.5.5. It should be noted that this office appreciates recycling of water.</p> <p>Activity 19 of Listing Notice 2, Regulation 545 (2010) refers to the construction of pollution control facilities which could exceed a dam wall height of 5m. The applicant is required to provide a full assessment of these dams as well as where this anticipated volume is expected to originate from.</p>	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	A climatic water balance has been compiled for the project (see Section 3 of the report). These comments will be taken into consideration and details provided in the EIA report.

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Water balance	Activity 12 of Listing Notice 1, Regulation 544 (2010) refers to the construction and expansion of water storage dam(s): most likely a pollution control dam, a service dam and a potable water tank with a combined capacity exceeding 50 000 cubic metres. The applicant is required to justify why this activity is triggered. Such a justification should include, but not limited to the details of where this quantity of water will be sourced and/or generated.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	This activity was included at the scoping stage of the project because the actual size of these facilities had not yet been determined. However it can now be confirmed that none of these facilities will exceed 50 000 cubic metres of capacity.
Sewage treatment	Section 3: Identification and description of potential environmental and social impacts states that sewage during the operational phase will be treated on site in a package plant. This office has noted this statement and looks forward to further details.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Details of the sewage treatment plant have been included in Section 3 of the report.
	At least one toilet seat per 15 workers, within 100 metres of every workstation must be provided. Sewage must be stored and transported in purpose-designed, sealed tanks. Every toilet unit must have at least one hand-washing facility that drains into a portable sewage tank.	Amajuba District Municipality, Scoping Report comments, 10/06/2015	Your comment is noted. Details have been included in Section 3 of the report.
	Experience has shown that "package-plants", as suggested in the scoping report, do not handle septic (anaerobic) sewage well. Sewage from underground workings and conservancy septic tanks is likely to be septic. An aeration apparatus of some sort will be required to oxygenated sewage before it enters the package-plant. Acid water and high detergent levels also interfere with package-plant efficiency and must be minimised/excluded from the system. The final effluent must comply with all applicable standards.		
Stormwater management	A suitable stormwater management plan will need to form part of the Environmental Management Programme, which will need to identify how to treat the potentially contaminated stormwater, and how best to deal with stormwater so that the post development stage of the proposal approximates predevelopment in terms of spatial release, intensity and recharge areas.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	

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	Typically, coal exploration demands include a washing and grading plant and a massive coal waste dump. These are always the main sources of water pollution problems. Absolutely no effluent or run-off from these developments can be allowed to reach the Pandana river or its tributaries. An impermeable catchment dam must be constructed so as to prevent run-off water from reaching any water course. This dam must be designed to, at least, retain water from a 1 in 50 year flood.	Amajuba District Municipality, Scoping Report Comments, 01/06/2015	
Site layout	Page1: introduction to the project states that "the total footprint of the surface infrastructure is estimated at this stage to be approximately 20ha". The applicant is required to: Provide this office with a layout map indicating the actual positioning of the infrastructure and the mining areas with respect to all sensitive habitats on site. Such a layout map should be superimposed on a representation showing ALL water courses on site, their delineated boundaries and clear markings of the 500m from the delineated boundary (in case of wetlands), the 1:100 year floodline or 100m horizontal distance from the edge of the river (in cases of rivers and streams).	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	A site layout plan in line with the Department's request is included in section 3 of the report.
	Provide this office with the actual or exact positioning of the diesel storage tank(s) with respect to the water courses on site. Such positioning should form part of the above map.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	
Rehabilitation	How will the mine be rehabilitated? In our experience the mines are not rehabilitated correctly and the farmers are left to deal with the consequences.	Nel Marie Mahne & Johan Mahne (landowner), meeting, 07/11/2014	A conceptual rehabilitation plan is included in Section 3 of the report.
	In terms of landscape and top soil rehabilitation, what is the ratio between volumes of material removed and railed away versus the created voids to be refilled at rehabilitation? What will be done to repair voids that cannot be refilled?	Impala Water Users Association, Scoping report comments, 22/05/2015	
	A rehabilitation and Management Plan must be included in the EIAR	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	

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Rehabilitation and associated costs	What safe guarding and rehabilitation is planned and costs provided for the following: 1. During the process of active mining 2. Any possible latent phase during mining of this current entity 3. At mine closure 4. At the selling of mining rights 5. At the transfer of mining rights to any other entity.	Johann Boonzaaier (Impala Water Users Association), IAP response form, 23/03/2015	The Mine Works provides for costs required to manage the project site during operations. The EMP also includes a conceptual closure and rehabilitation plan (see Section 3 of the report). In terms of closure, there is a requirement for financial provision for rehabilitation of mines at closure in the environmental legislation and this responsibility would need to be carried over to any future owner of the mine. The financial provision for closure is provided in section 23 of the report.
	A detailed description and assurances in terms of environmental and rehabilitation care is needed in the cases of: 1. Selling of mining right during mining 2. Closure and abandoning of the mine. 3. Escalation (transfer) of commitment of the Applicant	Impala Water Users Association, Scoping report comments, 22/05/2015	
	Tholie Logistics must be reasonable. We've seen mining companies who buy operating mines and end up abandoning the mine without rehabilitating the area due to the economic problems.	Johann Boonzaaier (Impala Water Users Association) Public scoping meeting, 26/03/2015	
Financial provision	My experience with various mines is that they operate much shorter than anticipated. The concept of financial provisions in a trust fund as required by the Department of Mineral Resources (DMR) is outdated. When considering the sensitive nature of the area, we need a massive amount of money upfront because if the mine liquidates then the financial provision provided to the DMR will not be enough.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	The financial provision for closure is provided in section 23 of the report. The actual amount to be provided at the start of the mine will be agreed upon with the DMR. The aim with the provision of funds is to ensure that funds are available to rehabilitate the current area of disturbance at any point in the life of mine.
Financial considerations	Does a percentage of the mine's profit go to the departments?	Nel Marie Mahne & Johan Mahne (landowner), meeting, 07/11/2014	Mining houses are privately owned entities. No profits are directed to government departments.
Land purchase	How much money did the Lens' family get for their land on Commiesiekraal?	Johan Mahne (Landowner) Public scoping meeting, 26/03/2015	No payment for land has been made at this stage.

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Timing	How long is the construction phase of the mine and when will mining commence?	Pat Collins (Utrecht Municipality), Public scoping meeting, 26/03/2015	Construction commencement is subject to regulatory approval, economic considerations and funding. Construction could commence in 2016 and take approximately six months to complete.
	When will the mine start operations?	L. V Sibeko, IAP response form, 26/03/2015	
Future mine plans	We are aware that prospecting during more or less 2010 and 2011, took place on other areas by Commissiekraal Coal, Vince Mining and Tholie Logistics. It involved a much larger area as the farm Commissiekraal 90Ht under this MR application. We need assurance of what is the long-term intention of the Tholie Logistics / Bright Resources in terms of this future development, mentioned above?	Impala Water Users Association, Scoping report comments, 22/05/2015	Tholie Logistics or its associated companies, under the umbrella of Bright Resources, have only carried out historical prospecting on the farms that formed part of the Tholie Logistics and Commissiekraal Coal prospecting rights. No prospecting was carried out by the company on Vince Mining's farms. The company is working towards ensuring that the planned mining operation is sustainable for a 20 year life of mine. To achieve this, the company is planning to maximise mining and resource utilisation on the farm Commissiekraal itself but believe that there is scope to extend the mine life beyond this by also mining some of the deeper areas towards the west of Commissiekraal. There are technical limitations, due to the depth of the coal seams in this area, so it is ultimately a techno-economic question. In principle though the company is interested in maximising the life of mine, within the technical and environmental constraints that apply.
Alternatives	In your information document you mentioned that the proposed access routes will involve the upgrading the existing gravel routes? No such gravel roads exist and the route crosses another river.	J. P Snijders, Public scoping meeting, 26/03/2015	Response at the time of scoping: Both access routes are gravel tracks up to a point from which the roads would need to be extended to reach the project site. Upgrading of the gravel track would be required to provide access to the project site. Note, however, that this alternative route is no longer being considered (refer to Section 3 of the report).
	The claim of Tholie to a proposed access route across Drift is unlawful	J. P Snijders, Scoping report comments, 22/05/2015	
Alternatives	Activities No. 11, 18, 22, 39, 40 and 47 of Listing Notice 1, Regulation 544 (2010) refer to the construction and/or expansion of haul roads with two alternative routes i.e. Route A and Route B as well construction of bridges and culverts that will cross watercourses. The applicant is required to: Assess the two alternatives inclusive of their pros and cons with respect to the potential impacts that each will have on the watercourses on site as well as ecosystems supported by these water courses and justify based on the above statement, the preferred alternative.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Initial project planning considered two potential access routes. Given two objections received from landowners during the scoping process, Alternative Route A was no longer considered feasible and was not considered further in the EIA process.

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No-go option	The assessment of a comparison between the “existing situation” and a situation with the project, the “No-Go option” sounds ridiculous. How will the future negative impacts on the environment and livelihoods of communities, inclusive of the remaining mitigation cost of the mining history in terms of environmental degradation and pollution, be weighed, against the personal financial gain of a private mining company and its shareholders?	Impala Water Users Association, Scoping report comments, 22/05/2015	Assessment of the no-go option is a requirement in terms of South African legislation. An alternative land use analysis was undertaken as part of the economic specialist study and meets the requirements of Regulation 50 of the Mineral and Petroleum Resources Development Act. The assessment included a comparative land use assessment and costs and benefits analysis (refer to 8 of the report). No prospecting or mining within watercourses is proposed. Open pit mining was considered but this alternative was discarded due to the significant environmental impacts of mining through the Pandana River.
	Will this coal mine after completion leave a better and healthier environment on and off site (downstream) with a better potential for biodiversity conservation, water production, agriculture and township development.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	
	The applicant has indicated that the lowest point in the project area is in the Pandana River, and this may result in numerous negative environmental and health impacts. Therefore the applicant must include a detailed investigation of the No-Go alternative including advantages and disadvantages that it may have on the environment.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	
	Ezemvelo cannot support prospecting within watercourses and wetlands on the proposed site.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	
Topography			
Surface subsidence	Infrastructure is regarded as the physical buildings and plant developed for the activities. A serious concern is the negative effect of mine tailings, washing area and waste dumps and the eventual collapse of the “mining roof” on the change of topography.	Impala Water Users Association, Scoping Report comments, 22/05/2015	The project plan does not make provision for mine tailings, washing area or waste dump and therefore these are not considered further in the EIA. Potential impacts on topography and the proposed mitigation measures are discussed in Section 8 of the report.
	Pillar extraction and roof collapse will cause a vertical shear effect on all layers up to surface. How will water / hydrological inflow and subsequent contamination of other resources be prevented?	Impala Water Users Association, Scoping report comments, 22/05/2015	
	MTPA recommends that a risk assessment is done which includes the prevention of subsidence and mitigation costs	Mpumalanga Tourism and Parks Agency Scoping report comments, 25/05/2015	

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Blasting affecting topography	What is the landscape, soil types and slope stability in terms of blasting operations?	Impala Water Users Association, Scoping report comments, 22/05/2015	At this stage in project planning very limited blasting is expected. Blasting will only be required to establish a portal/adit to access the seam. The highwall will be adequately supported with anchors if required and wire mesh and cement. The mine will conduct all required assessments prior to blasting to ensure that the blasting design considers all factors to ensure stability and safety factors are addressed.
Soil related issues			
Soils	A description of the impact, safe guarding and rehabilitation of stock piling over time on the surrounding soils	Johan Boonzaier (Impala Water Users Association), IAP response form, 23/03/2015	Potential impacts on soils and land capability and the proposed mitigation measures are discussed in Sections 8 and 20 of the report respectively.
	Large spatial variability appears in soil and land type occurrence, which already over time, formed a dynamic equilibrium and interlinked functional system, reflected in the natural water accumulation, subsoil percolation and surface runoff. In terms of your own acknowledgement of the agricultural potential of the land, it should be realised that disturbance of this equilibrium will negatively affect the surrounding interlinked soil-water system.	Impala Water Users Association, Scoping report comments, 22/05/2015	Your comment is noted
Biodiversity related issues			
Specialist study	What was the objective of the biodiversity work that has been completed to date?	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	The objective of the biodiversity work that has completed to date was to determine the baseline situation of the project area by means of desktop reviews of available databases and confirming these findings through field work. This baseline information has provided input to the biodiversity impact assessment process.
	What is a vegetation index score? I want to see what this vegetation index entails. It is concerning that the proposed project site is compared to areas in other provinces.	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	It is an in-house system, developed by the biodiversity specialist, Scientific Aquatic Services (SAS), used to compare different vegetation types based on regional indices. The methodology used is included in the specialist report appended to the EIA and EMP report.
	All protected areas, declared and not declared need to be included in the biodiversity study.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	All declared and proposed protected areas have been considered in the biodiversity assessment - refer to section 8 of the EIA and EMP report.
	How long did the biodiversity specialists spend on site?	Glenn Ramke, Biodiversity meeting, 18/08/2014	As part of the baseline assessment three site visits were undertaken. For some of these visits a full week was spent on-site and the team comprised five people. Further detail is

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Specialist study	We have data that we can share with you. It includes 1) more updated wetland analysis of the general area which we can give to you in shape files, 2) the Pongola Protected Bush Environment is much closer and was only proclaimed this year - the biodiversity study mapping needs to include the layer of the newly protected environment, 3) the stewardship layer the provincial file of the protected area expansion areas - these areas need to be included into the biodiversity study and 4) the point data source (bioblits) information to confirm the presence of species within the proposed project area.	Angus Burns and Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Relevant information was sourced from Ezemvelo KZN and WWF and has been used to inform the biodiversity specialist study and EIA.
	It is brought to your attention that DAFF as the authority mandated to regulate activities affecting natural forests and tree species protected in terms of the Natural Forests Act, 1998, does not support the destruction of natural forests and protected tree species. It is therefore recommended that a forest specialist/botanist/ecologist is appointed to conduct an assessment of the project area for the presence of forests and protected trees within the project area, determine the status of the forest and the potential impacts on the forest and protected trees. A report should be compiled and collated into the Environmental Impact Assessment (EIA) Report for further review	Department of Agriculture Forestry and Fisheries - KZN, comments for scoping report, 29/04/2015	A biodiversity study was conducted and addressed forests and protected tree species. The full report is appended to the EIA and EMP report.
	MTPA recommends that thorough ecological assessments are done for this proposal which includes a wetland assessment (Seepage wetlands, permanent wetlands, fountains, streams and rivers). This hydro census must include the present ecological state of these aquatic features and must quantify the water production (contribution) in the wet and dry season to provide a baseline of the conditions before mining. SASS5 readings in permanent streams and river. Potential decanting points.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	Full biodiversity, surface and groundwater specialist studies have been conducted for the project. The impacts are discussed in section 8 and the actual specialist reports are appended to the EIA and EMP report.
	MTPA recommends that thorough ecological assessments are done for this proposal which includes a flora species and species composition of the surrounding grasslands as well as those within the wetland areas recorded at least three times during the growing season in order to capture meaningful data. This area is known for its numerous protected geophytes such as terrestrial orchids that have different flowering times from September to April. The effect of coal dust on sensitive plants and grazing animals.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	A biodiversity specialist study has been appointed for the project. The study includes flora species (see Section 6.4.3 of the scoping report). Very limited scientific data is available on the effect of coal dust on sensitive plants and grazing animals. Available information will be included in the specialist report.

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Specialist study	MTPA recommends that thorough ecological assessments are done for this proposal which include studies on the occurrence of invertebrates and reptiles.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	A biodiversity specialist study was completed for the project. The study included invertebrates and reptile species.
	MTPA recommends that thorough ecological assessments are done for this proposal which include fauna species. Thorough breeding data of grassland avifauna species on site and on neighbouring farms. With focus on Crane species.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	A biodiversity specialist study has been completed for the project. The study includes fauna species including available breeding data on avifauna species.
	MTPA recommends that a risk assessment is done which considers building and maintenance or rehabilitation of access roads through sensitive and high risk areas.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	A biodiversity specialist study has been completed for the project. The study provided input on mitigation measures (see Section 20 of the EIA and EMP report).
	It is also strongly recommended that specialists make themselves familiar with the mining and biodiversity guidelines in order to inform mitigation recommendations.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	The mining and biodiversity guidelines have been taken into consideration in the biodiversity study.
Mapping	Reference is made to Activities 4, 10, 14, 16 and 19 of Listing Notice 3, Regulation 546 (2010) which refers to the clearance of an area of 5ha or more of vegetation where 75% or more constitutes indigenous vegetation. This vegetation is said to include Critical Biodiversity Areas, wetlands according to NFEPA and vulnerable ecosystems, to mention a few. The applicant is required to: clearly represent (on an A3 sized colour map) all the affected ecosystems in a map of clear resolution and clearly represent (by means of a map) the percentage to be lost for each ecosystem.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	The relevant biodiversity maps are provided in the baseline section of the EIA and EMP report.
	All areas identified as sensitive will need to be put onto one sensitivity map to be provided in the Draft EIR, as part of the Impact Assessment section, which should include the proposed layout of all surface infrastructure, proposed underground mining areas, and the sensitive areas and proposed buffers.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	
	Ezemvelo have also produced a guideline for undertaking specialist biodiversity assessments in Kwa-Zulu Natal, which the specialists are encouraged to make use of for guidelines of how to produce sensitivity maps.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	

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Importance of biodiversity	The biodiversity work that has been undertaken to date shows that a comprehensive study has been done. The information that has been presented today supports what we have found in the area and that the area is important for conservation. Tholie Logistics is therefore fully aware that the proposed project will face a lot of issues.	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Both SLR and Tholie Logistics acknowledge that biodiversity is an important factor in this area. Potential impacts on biodiversity and the proposed mitigation measures are discussed in Sections 8 and 20 of the report respectively. The biodiversity specialists made use of these mentioned guidelines.
	When you spoke about the current state of the environment you mentioned the Wakkerstroom Montane Grassland. How will the mine protect this grassland as it is listed as a threatened biome?	Ayanda Nzimande (WWF SA) Public scoping meeting, 26/03/2015	
Importance of biodiversity	The proposed site supports both wetlands and watercourses that lead into the Pandana River. The Pandana River is documented as a "Category A" river by the Freshwater Ecosystem Priority Areas (FEPA)1 document. This means that the river is largely natural and unmodified. FEPA1 takes into account a river's "present ecological state, river health data, reserve determination data, expert knowledge and natural land cover data." (Driver et al., 2011, pg 8). Proposed mining can have negative effects on downstream users. FEPA's usually constitute tributaries and wetlands which feed into major rivers and maintaining these systems is important for sustainable water use. Category A rivers help achieve biodiversity targets, manage freshwater ecosystems and protect water resources for human consumption. It is thus imperative that they be maintained in a good condition.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	Your comment and concerns are noted. Potential impacts on biodiversity and the proposed mitigation measures are discussed in Sections 8 and 20 of the report respectively.
	Portions of the proposed prospecting area are categorized as fish sanctuary/corridor areas by the FEPA1 document. These areas are vital for ensuring the protection of threatened and near threatened freshwater indigenous fish. Thus FEPA's goal is to ensure that these species do not experience further pressures and subsequently no further deterioration of the river condition in these sanctuary areas should be allowed to occur.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	
Conservation initiatives and the applicant's role	If you declare areas surrounding the proposed project area it would not be easy for other companies to get rights over those areas. There would be no harm in participating in a declaration. There is a 40 000 ha area around the proposed project area that is in the process of being declared. We don't want a mine. Let's see what you can up with and maybe it is a viable situation but regardless of the mine, the surrounding area is on the table for declaration and we want a suggestion to protect those areas.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Tholie Logistics is of the opinion that mining and biodiversity can co-exist. It would be open to establishing a partnership in order to work together to protect areas surrounding the project site. Tholie Logistics wants to support initiatives. This aspect will be discussed further between Tholie Logistics and the respective conservation stakeholders during the course of the EIA process. Initial discussions to determine how conservation projects could be incorporated into the project's social and labour plan have taken place between the SLP specialist and WWF representatives.

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Conservation initiatives and the applicant's role	If Tholie Logistics "sterilises" the surrounding farms to ensure that mining cannot take place on these farms in the near future, could Tholie Logistics apply to mine these areas at a later stage?	Karsten Hinze, Biodiversity meeting, 18/08/2014	Tholie Logistics is of the opinion that mining and biodiversity can co-exist. It would be open to establishing a partnership in order to work together to protect areas surrounding the project site. Tholie Logistics wants to support initiatives. This aspect will be discussed further between Tholie Logistics and the respective conservation stakeholders during the course of the EIA process. Initial discussions to determine how conservation projects could be incorporated into the project's social and labour plan have taken place between the SLP specialist and WWF representatives.
	We appreciate that you acknowledge that the area is sensitive and have brought us all together. I am worried that things change and that you will try to acquire the mining right in a very short time (by the end of the year). We are generally opposed to mining. Should the mining right be granted within this time and there is a real win-win opportunity, we need a formalised arrangement in place for the "sterilisation" of areas surrounding the proposed project site because of the short time frame. This will ensure that there is an opportunity upfront to assist and commit to the declaration of areas surrounding the proposed project site. If your commitment is leaning toward a sustainable situation it would be honourable and the right thing to do to assist before getting the mining right.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	
	The EIA process is the correct avenue if we as stakeholders were to consider a partnership with Tholie Logistics. It would be inappropriate for us to consider supporting a partnership too early in the EIA process and as such we would only consider exploring a partnership if the mining right was granted. An EIA process can do things in an amicable way and can allow for the consideration of how a partnership could be developed if the mining right was granted. It is important to note that we would not want to be seen as the thin edge of the wedge. We are still concerned about coal mining within these areas and as much as Tholie Logistics may be responsible there are a lot of irresponsible mining houses.	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Your comments and concerns are noted.
	What happens if Tholie Logistics sells shares and the new shareholders have different objectives to Tholie Logistics? What is the risk?	Karsten Hinze, Biodiversity meeting, 18/08/2014	A legally binding agreement would need to be signed between stakeholders and Tholie Logistics. There would need to be a clause in the agreement that deals with this issue.
	That is why formal procedures need to be put in place to stop this from happening.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	

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Conservation initiatives and the applicant's role	Economy is the driving system, Tholie Logistics could sell during hard times. We don't know what new companies may do. In the near future there could be an economic demand for coal in which case how can you ensure us that other resources surrounding the proposed project site would not be exploited?	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	A legally binding agreement would need to be signed between stakeholders and Tholie Logistics. There would need to be a clause in the agreement that deals with this issue.
Species identified	Are there any Oribi on the farm?	Bradley Gibbons (Endangered Wildlife Trust), Biodiversity meeting, 18/08/2014	No Oribi were observed during the site visits.
	The Southern Barred Minnow, is critically endangered and is located within the proposed project area. Please contact Ezemvelo for further information.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	This was considered in the biodiversity specialist study.
	Concerns over the biodiversity were raised, in particular to the diverse tree species in the area.	Jean-Pierre Snijders, Landowner notification meeting, 02/12/2014	Both SLR and Tholie Logistics acknowledge that biodiversity is an important factor in this area. Potential impacts on biodiversity and the proposed mitigation measures are discussed in Sections 8 and 20 of the report respectively.
Proclamation of land	When was all this land proclaimed - it appears that all this land is being proclaimed to compete against the mines.	Nico Lens (Landowner), Biodiversity meeting, 18/08/2014	Your comment is noted for consideration by the decision-making authorities.
Loss of biodiversity	The baseline description highlights a number of important biodiversity features and related topography and surface water features. This office requires that the applicant provide a comprehensive account on the direct, indirect and cumulative impacts that can potentially have a negative impact on the biophysical environmental attributes during construction, operation and decommissioning phases of this development. Similarly, the applicant is also required to propose mitigation measures to minimize the impacts to the biophysical environment attributes.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Potential impacts on biodiversity and the proposed mitigation measures are discussed in Sections 8 and 20 of the report respectively.
	Specialist reports should address avoidance of the South Western corner where the site is identified as a critical biodiversity area, and irreplaceable for nesting cranes, and for wetlands. Impacts of the proposed mine on this area will need to be investigated in detail. In addition, suitable buffers to these critical biodiversity areas will need to be established by the specialists.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	
	The proposed mine should protect the biodiversity and keep our water clean.	Phindi Mtshali, Scoping Report Comments, 21/05/2015	

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Water related issues			
Water features	There is a watershed near the property.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Thank you for this information. This information has been considered as part of the hydrological study.
	How do you classify if a river is a flagship river?	Karsten Hinze, Biodiversity meeting, 18/08/2014	A flagship river is identified according to the National Freshwater Ecosystem Priority Areas database which highlights areas of importance.
	I farm downstream of the Pandana River. What do you mean by saying it is not free flowing?	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	This means that from the source to the sea there are barriers. It is important to note that this statement was made by the biodiversity specialist based on information provided in existing databases.
	You mentioned that the Pandana River is not free-flowing. There is a small section that is classified as a NFEPA. According to my records the Pandana River is free flowing and perennial. It is not dammed.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	It is confirmed by the aquatics assessment that this river is classed as not free flowing by the NFEPA database.
	Please double check that the Pandana River is definitely classified as not free flowing as I do not agree with this statement.	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	
	The proposed mine is in pristine environment where there has never been any mining activity in the Pandana, Tsakwe, or Sibabe Rivers, important catchments for the Pongola River	J. P Snijders, Scoping report comments, 22/05/2015	Your comment is noted and has been taken into consideration during the EIA process.
Water features	This area has an annual rainfall of between 1000 - 1500 mm which supplies downstream water users. The Pongola River is the sole water source of this area so it is a highly critical resource for us.	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	Your comment is noted. The importance of the area of a water production area has been considered in the EIA.
Water use	The rivers and wetlands on the landowner's property are in good condition which is evidence of good land management. These rivers and wetlands provide ecosystem services to downstream users which is why creating protected areas is so important. There are a number of water users downstream that are reliant on this water resource and that is why it is so important to protect the upper catchment area.	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Your comment is noted. Details on the rivers and wetlands within the project area are provided in the baseline section of the report. Biodiversity and water related impacts have been addressed as part of the respective specialist studies.
	All livestock obtain water from rivers. Spring water is used for human consumption. There are only a few boreholes in the area.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Thank you for this information. A hydrocensus was undertaken as part of the groundwater study to identify existing water users and this information is provided in the groundwater baseline section of the report.
	Water production value is very important and that is why the proposed project site is a red flag area.	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Your comment is noted. The importance of the area of a water production area has been considered in the EIA.

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Water use	Based on a study done by the Council of Scientific and Industrial Research, the Pongola River covers approximately 8% of the land surface area of South Africa and provides more than 80% of water to South Africa. A technical document and shape files of the CSIR study are available and need to be included into your study. This is a big social economic consideration.	Angus Burns (Manager: WWF-SA Grasslands Programme), Biodiversity meeting, 18/08/2014	Your comment is noted. The importance of the area of a water production area has been considered in the EIA.
	What about the downstream users all the way to Mozambique?	Johan Boonzaaier (Impala Water Users Association) Public scoping meeting, 26/03/2015	The surface and groundwater specialist studies have identified the potential impact zone associated with water-related impacts. The water related impact assessments are provided in section 8 of the EIA and EMP report.
	The downstream users to Swaziland should then also be considered	J. P Snijders, Public scoping meeting, 26/03/2015	
Loss of water supply and/or pollution of water	Springs on our property have dried up since the prospecting commenced.	Abrie Landman & Johan Landman (landowners), meeting, 06/11/2014	It is unlikely that prospecting activities would affect water levels in natural springs. Prospecting activities are generally limited to the drilling of boreholes to obtain core samples.
	At Longride mine, located on Twisthoek, the river disappeared after blasting.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Thank you for this information. The potential for surface subsidence has been considered in the EIA.
	A description of the impact, safe guarding and rehabilitation of stock piling over time on the surrounding surface water and groundwater	Johan Boonzaaier (Impala Water Users Association), IAP response form, 23/03/2015	Your concern has been noted. Project-related water quality issues have been addressed as part of the hydrological and groundwater studies completed for the project. The relevant specialist studies are appended to the EIA and EMP report.
	The mines proposed usage of water is a lot, and you say that the mine intends to source this from the municipality but the municipality cannot currently cope with its demand.	Karsten Hinze (Commondale Farmers), Public scoping meeting, 26/03/2015	
	With regards to the current issue of water supply from the municipality what security can you give us that the mine will not be pumping water from the rivers which will put all the users downstream in harm?	Johan Landman (Landowner and Farmer), Public scoping meeting, 26/03/2015	

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Loss of water supply and/or pollution of water	Dewatering will cause a large depression in the landscape, how can we be sure that this won't dry up the water courses or groundwater levels in the neighbouring farms?	Johan Boonzaaier (Impala Water Users Association), Public scoping meeting, 26/03/2015	Your concern has been noted. Project-related water quality issues have been addressed as part of the hydrological and groundwater studies completed for the project. The relevant specialist studies are appended to the EIA and EMP report.
	In the past years, during flood events the Pongola River would flood the road and we would not be able to cross the road for months. Recently the river would flood the road for only a few weeks and last year it flooded the road for a few days. The mine will only put more pressure on the catchment.	Dave Smith (NCT Forestry), Public scoping meetings, 26/03/2015	
	What will be done to ensure the water quality and volume remains in a good state?	Johan Kemp, IAP response form, 26/03/2015	
	There is an old mine that used to have water problems - brown acid water, 20 years ago. Only now the water is becoming right.	Clement and Nico Lens, Landowner meeting, 25/03/2013	
	There are already concerns regarding safeguarding water for communities downstream of the proposed project site. There is no other water source apart from the Pandana River for downstream water users. You can't change the impact once it has occurred.	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	
	When SLR embarks on the EIA process, site specific sensitivity needs to be addressed in the EIA report. What is important for us to see is how Tholie Logistics will ensure that good water is still provided to downstream users as water is a fundamental issue.	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Your concern has been noted. Project-related water quality issues have been addressed as part of the hydrological and groundwater studies completed for the project. The relevant specialist studies are appended to the EIA and EMP report.
	Even though it is anticipated that the coal associated with the proposed project has a low sulphur content and that acid mine drainage might not be such an issue, we know of mines in the area that have closed down which have caused problems for the first downstream water user. We acknowledge that further downstream it is less of a problem due to the dilution factor however this can't keep on happening.	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	The issue of acid mine drainage has been investigated as part of the groundwater specialist study with input from the geochemical study. The relevant specialist reports have been appended to the EIA and EMP report.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Loss of water supply and/or pollution of water	Everyone knows what the problems are with the Olifants River emanating from the Witbank area to the Kruger Park and what the risks are due to mining. We are the water users association and we should protect water resources.	Johan Boonzaier (Impala Water Users Association), Biodiversity meeting, 18/08/2014	Your concerns are noted. Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	I am a user on the Pandana River. My neighbour is a user just below me on the Pandana river so we will be 100% impacted if something goes wrong at the mine. I agree that there will be a dilution effect. For example the stream from the Malatees Kop flows into the Pandana river and it is diluted and people can use it at the moment but if there are three, four, five, six, seven, eight of these mines then eventually nobody will be able to use this water. The users on that first small stream from the proposed project area will be 100% affected.	Ralf Kusel (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	Your concerns are noted. Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	The stakeholders from the Pongola Water User Association don't know where the water comes from. Our farm is 2000ha; water coming from our farm does not even reach members of the Pongola Water Users association because so many farmers use the water along the way. I am not an expert in mining and I don't know what the impacts will be but it makes no sense to me why the Pongola Water User Association is so concerned about mining when farmers upstream use fertilisers in their lands which reach downstream users. The Pongola Water User Associated never complains about this.	Nico Lens (Landowner), Biodiversity meeting, 18/08/2014	
	Water quality monitoring commenced before prospecting started.	Abrie Landman & Johan Landman (landowners), meeting, 06/11/2014	Your comment is noted.
	The catchment in this area provides water to many communities downstream therefore we are concerned about the potential water pollution.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Your concerns are noted. Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	The Kempslust mine is full of water. A nearby neighbour used the water for irrigation close to Kempslust mine and his pivot rusted from the acid in the water.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Thank you for this information. Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	Concerns over the impacts on the water quality by the proposed project are a concern.	Jean-Pierre Snijders, Landowner notification meeting, 02/12/2014	

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Loss of water supply and/or pollution of water	Water supply is only one part of the equation, what about the waste water from the mine? Where will this be discharged?	J. P Snijders, Public scoping meeting, 26/03/2015	Your concerns are noted. Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	The water from Kemplust is currently brown, aquatic life has decreased therefore it is not only during operation that we see these impacts but also long after the mine has been closed such as the abandoned mines in the area.	Kurt Huile, Public scoping meeting, 26/03/2015	
	The abandoned mines in the area is a prime example of how mines can impact the water quality years after closure, this will be the same for the new proposed mine. The proposed mine should take these old mines and fix the existing problems to prove to us that they can contain and resolve the current water issues.	Johann Boonzaaier (Impala Water Users Association) Public scoping meeting, 26/03/2015	Your concerns are noted. Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	I've had my ground water tested and already through the abandoned mines there is evidence of pollution. If this new mine pollutes my ground water who will be responsible for my crop failures?	Johan Landman (Landowner and Farmer) Public scoping meetings, 26/03/2015	
	The local municipality fails to give us water therefore we use the rivers as our only source of water. If these rivers are polluted we will have a big problem.	Phindile Buthelezi, Public scoping meeting, 26/03/2015	
	The proposed mine is positioned in the headwaters of the Pandana River and this river is used by as many as 60-80% of people in the area and many more downstream. How will the mine prevent polluting this water?	Ayanda Nzimande (WWF SA) Public scoping meeting, 26/03/2015	
	What effect will the high volume of water runoff, rain and seepage have, taking the slopes and water resources and drainage into consideration, on other water and natural resources, also economic activities as mentioned by Tholie Logistics.	Julius Kleynhans, IAP response form, 26/03/2015	
	Where will waste water be discharged and how will it be treated?	Julius Kleynhans, IAP response form, 26/03/2015	

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Loss of water supply and/or pollution of water	Information provided is very basic. However it does indicate various critical pointers that will be exposed to the proposed mining activities. The geological subsurface material which will be exposed during excavation, washing, stock piling and dumping will affect surface and groundwater in this particular setting irreparably. This impact is cumulative and irreversible	Impala Water Users Association, Scoping Report comments, 22/05/2015	Project-related water quality issues will be addressed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report). Note: there is no provision for an on-site wash plant in the proposed project plan.
	The water quality and chemical analysis of the fountains and streams must be provided in the EMP.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	
	MTPA recommends that a risk assessment is done which considers the prevention of dewatering and mitigation of sensitive grasslands, fountains, wetlands and streams in the underground mine plan area.	Mpumalanga Tourism and Parks Agency Scoping report comments, 25/05/2015	Dewatering issues will be addressed as part of the groundwater study that will be undertaken for the project (refer to Section 6.4.5 of the scoping report).
	Sewage during the operational phase will be treated on site in a package plant. Such details should include, but not limited to, the potential impacts (direct, indirect and cumulative) of constructing, operating and decommissioning this package plant on all water resources and the biodiversity supported by those water resources. In addition the applicant is required to model the resultant water quality as well as the potential impacts that this effluent will have in the case the effluent is discharged to the abutting water resources.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Water-related impacts will be assessed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Loss of water supply and/or pollution of water	Page (iii): Environmental setting states that the proposed site is located in a region seen as a key water production area for downstream water users. The applicant is required to discuss the impacts of the development with respect to this statement as well as proposed mitigation measures.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Water-related impacts will be assessed as part of the hydrological and groundwater studies that will be undertaken for the project (refer to Sections 6.4.4 and 6.4.5 respectively of the scoping report).
	The Pandana river is a perennial tributary to the Pongola river upstream of the Jozini dam. The source of the river is a short distance from the South-Western boundary of the farm. Even after a poor rainy season this stream is flowing strongly. There being no development in the area, the river is currently in pristine condition. It is one of very few reliable, water courses in the province that is still in its natural state. Every measure must be taken to preserve this river in its current condition. More than 1 000 000 people depend on the Pongola and its tributaries downstream from the proposed mine. We as the water authority for the area have an inescapable obligation in this regard. The coal reserve proposed to be exploited extends below the river and a number of its tributaries. Should the mine fracture the over-burden through the course of the river, it will permeate to the seam and will emerge with a lower pH and higher conductivity readings.	Amajuba District Municipality, Scoping Report Comments, 01/06/2015	
	Basic flaws with regards to geology and hydrology in relation to the planned mining methods need to be identified.	Mpumalanga Tourism and Parks Agency Scoping report comments, 25/05/2015	
	Impacts of the mine, including potential draw down, and acid mine drainage from the mine on the Pandana river, and the impacts on the fish sanctuary.	Ezemvelo KZN Wildlife, Scoping report comments, 04/06/2015	
	Impacts related to stormwater and potential changes it will have on the Pandana river.		

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Specialist study	Are the water specialist studies all field-work based or modelling based?	Johann Boonzaaier (Impala Water Users Association), Public scoping meeting, 26/03/2015	The study will be based on both a hydrocensus and modelling work.
	This office looks forward to the surface and ground water reports that will be conducted for the EIA phase.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Your comment is noted.
	The Pandana River cuts through the centre of the project area. It is anticipated that soil erosion will occur and is most likely to be deposited into the nearby watercourses. Therefore, the applicant must assess the mitigation measures that will be used to minimise erosion in these areas.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	Soil erosion management plan is provided in section 20 of the EIA and EMP.
	The stormwater management plan must be included in the EIAR.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	The stormwater management plan is included in section 3 of the EIA and EMP.
Stream crossings	The applicant is required to: Elaborate on the impacts (direct, indirect and cumulative) to the watercourses on site of constructing the haul roads and the bridges.	Department of Water and Sanitation - KZN, Scoping report comments, 01/06/2015	Potential impacts will be assessed as part of the hydrological study (see Section 6.4.4 of the scoping report).
Mitigation	Will the mine consider financing baseline studies on these farms to provide a basis for future claims?	Eugene van Aswegan (Afri forum), Public scoping meeting, 26/03/2015	A full suite of baseline studies have been conducted as part of the EIA.
Air Quality			
Dust generation	With the tons of coal that will be transported by road there is a high possibility of dust pollution, will I be able to claim from the mine for damaged crops?	Paul Rannifore, Public scoping meeting, 26/03/2015	This is a difficult question to respond to. Claims often require proof and there are usually a number of factors that could contribute to crop damage.
	You made reference to the dominate wind direction in the different seasons. What would the distance and direction of the dust plume be from the proposed mine site?	Karsten Hinze (Commundale Farmers), Public scoping meeting, 26/03/2015	Potential air quality quality impacts and proposed mitigation measures are discussed in Section 8 and 20 of the report respectively.
	Increased traffic, especially multi-axle coal trucks, on the gravel roads will aggravate the existing dust nuisance for people living and working alongside the roads. The access road/s must be kept wet at all times by the mine so as to reduce this nuisance. Route should be effectively planned so as to minimise the impact to human and animal health.	Amajuba District Municipality, Scoping Report Comments, 01/06/2015	

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	The effect of coal dust on sensitive plants and grazing animals.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	An air quality study has been completed for the project however this focusses on human health. It is difficult to quantify the effects of dust on vegetation to a lack of scientific research.
	The dust management plan must be included in the EIAR	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	A dust management plan is included as part of the mitigation measures (see Section 20 of the report).
Heritage			
	<p>A review of the information provided indicates that the development falls within an area which is largely rural and has not been thoroughly surveyed. The paleo-sensitivity map further indicates that the development falls in an area associated with high sensitivity and therefore requires a desktop study. Based on the outcome of the desktop study, a field assessment is likely.</p> <p>Considering the heritage value of the area of proposed development, a Heritage Impact Assessment is required for the above proposed project in terms of the KwaZulu Natal Heritage Act No. 4 of 2008 and the National Heritage Resources Act No.25 of 1999 (Section 38 (1)). This must include the archaeological component (Phase 1) and paleontological heritage components. Amafa KZN Heritage therefore requires the appointment of an Amafa accredited Heritage Practitioner to assist in the provision of recommendations and mitigation procedures.</p>	<p>Amafa Heritage KZN, Scoping report comments, 09/06/2015</p> <p>Amafa Heritage KZN, Scoping report comments, 09/06/2015</p>	<p>Both a heritage and palaeontological specialist study was completed by accredited specialists for the project. These studies were aimed at:</p> <ol style="list-style-type: none"> 1. Characterising the baseline environment by identifying potential heritage, cultural and paleontological sites within the mining right application area 2. Assessing potential impacts of the proposed mining activities on these resources 3. Developing practical and effective management measures to mitigate the potential impacts 4. Re-assessing the potential impacts, taking into account the proposed management measures. <p>The results of these studies are provided in Sections 8 and 20 of the EIA and EMP report, with the specialist reports attached.</p>
Visual			
Visual	Mine tailings and waste/overburden dumping sites will also affect the visual landscape character and, as acknowledged in the Report, "the sense of place and scenic quality".	Impala Water Users Association, Scoping Report comments, 22/05/2015	Your comment is noted. Potential impacts on the visual resource and the proposed mitigation measures are discussed in Section 8 of the report. Note: the project will not produce any mine tailings or waste/overburden dumping sites. It is anticipated that any waste rock/overburden produced from the development of the boxcut will be used to create a platform for surface infrastructure.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Socio-economic: transport related issues			
Transport routes	The proposed route (i.e. Route B) intersects workers houses.	Abrie Landman & Johan Landman (landowners), meeting, 06/11/2016	Your comment is noted. This issue will be investigated as part of the EIA process.
	The location of the proposed access route is not appropriately selected due to the number of plantations and residential property of the tenants on the farm that it passes through.	Jean-Pierre Snijders, Landowner notification meeting, 02/12/2014	
	The route between Rooipoort and Commiesiekraal is the most active as the children use it to get to school everyday and generally everyone uses it to get to the main D699 road at the school.	Local gathering by men on the Rooipoort farm, Social scan, 05/03/2015	
	For comparison, the Kempslust mine was mining 20,000 tons per month. The previous mine trucks in the area caused great damage to the roads and these mines were mining 10 times less than the proposed mine. The roads will collapse with the increased pressure.	Johan Kemp, Public Scoping meeting, 26/03/2015	The proposed production rate is 960,000 tons per annum. This equates to 80,000 tons per month. The A traffic study is planned and will consider both road capacity and road safety (see Section 6.4.11 of the scoping report).
	The EIAR must include an investigation on the impacts of access roads cutting through sensitive areas or watercourses and other alternative routes as route A has been eliminated as an alternative.	Department of Economic Development, Tourism and Environmental Affairs, 27-07-2015	
Road capacity	The roads are not built to handle mine traffic.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	A traffic study will be undertaken as part of the EIA process. The terms of reference for the study are included in Section 6.4.11 of the scoping report.
	What will be done to keep the roads in good condition?	Johan Kemp, IAP response form, 26/03/2015	
	Who will maintain and upgrade the roads?	Julius Kleynhans, IAP response form, 26/03/2015	

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
	<p>This mine is at least 50km from the nearest towns (Wakkerstroom (west) and Paulpietersburg (east)). The roads connecting the farm to the towns are narrow, gravel, district type roads that have many steep inclines. These roads are suited to light vehicles only. One often encounters timber trucks transferring some of their load to another vehicle so as to navigate their way through the mountains. The road between this farm and Paulpietersburg is also subject to wash-aways at regular intervals. The scoping report proposes that the product will be transported to a rail siding and customers by road. Articulated coal trucks will struggle unless very expensive upgrading is undertaken by the relevant roads authority.</p>	<p>Amajuba District Municipality, Scoping Report Comments, 01/06/2015</p>	<p>Thank you for your comments. These will be taken into consideration as part of the traffic study wfor the project (see Section 6.4.11 of the scoping report).</p>
	<p>The scoping report suggests that the mine will upgrade and use the existing farm road for access to the D699 as its first option. Should this prove to be the case, a modification of the junction will be required so as to protect the adjacent Luthilunye School from the hazards (dust, noise and road safety) presented by the coal trucks. This office suggests the construction of glide on/off ramps that effectively move the junction at least 100m to the west and east of the school. The second option involves building a new road over one or more adjacent farms. The owners of this land are adamant that they will not allow this.</p>	<p>Amajuba District Municipality, Scoping Report Comments, 01/06/2015</p>	<p>Thank you for your comments. These will be taken into consideration as part of the traffic study for the project (see Section 6.4.11 of the scoping report).</p>
	<p>To what extent and on which roads are road development and maintenance being planned?</p> <p>No mention is made of the existence or extent of consultation and consent of the local municipality and Roads Department of Paulpietersburg regarding the use, maintenance and upgrading of roads, anticipated in with this endeavour?</p>	<p>Impala Water Users Association, Scoping Report comments, 22/05/2015</p>	<p>The traffic specialist study will inform this. The detail will be included in the EIA report.</p> <p>Both the local municipality and Roads Department are registered as commenting authorities in the EIA process (see IAP database included as Appendix C of the scoping report). It is anticipated that the traffic specialist study will inform any requirements for changes/upgrading to road infrastructure. Any subsequent approvals required from the Road Department would likely be sought following a decision on the EIA.</p>

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Spillage	Roadside coal pollution has been a big problem in coal mining areas. Coal must be transported "dry". Wetting the coal so as to reduce particles being blown off the trucks results in an accumulation of acid water on the roads and does not work. Loose tarpaulins flapping at the back eject particles that are a serious hazard to other road users. Tarpaulins must be anchored on all sides, so as to prevent any particles from leaving the load bay. The mine will be held responsible for any spillage even if a contractor is engaged to transport the product.	Amajuba District Municipality, Scoping Report Comments, 01/06/2015	Your comments are noted and will be taken into consideration in the EIA report.
Socio-economic: land use related issues			
Depreciation of land values	How will the proposed mine impact the value of the farms should the owners want to sell in the future?	Abrie Landman & Johan Landman (landowners), meeting, 06/11/2014	Socio-economic related issues are assessed in section 8 of the EIA and EMP.
Compensation	If the proposed project affects the landowners in any way they should be compensated.	Jean-Pierre Snijders, Landowner notification meeting, 02-12-2014	Your comment is noted and will be taken into consideration in the EIA process.
	What insurance do other economic practices have from this activity to protect their assets, economic activities and staff from issues occurring due to this project. Example water contamination.	Julius Kleynhans, IAP response form, 26/03/2015	Socio-economic related issues are assessed in section 8 of the EIA and EMP.
Land uses	It was mentioned that the proposed project area is mostly undisturbed apart from some agricultural activities. When you refer to agriculture do you mean ploughing?	Greg Martindale (Ezemvelo KZN Wildlife), Biodiversity meeting, 18/08/2014	Yes.
	If the project should not go ahead, what would happen to the current landowners? They have been downscaling due to the fact that there is an expectation that their farms will be bought from Tholie Logistics. What will happen to the farmers and the property if the mine does not go ahead?	Johann Hiesteremann (Elandsberg Protected Environment), Biodiversity meeting, 18/08/2014	If the project does not go ahead, the current land uses on the farm would continue.

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Land uses	In your information document you mention the land use of the area. Is this based on current or potential land use because you say that there are remnants of forestry? This is false because forestry could be a project alternative which could result in economic benefits.	J. P Snijders, Public scoping meeting, 26/03/2015	The EIA addresses both the current land use in the baseline section and potential land uses as an alternative.
	What will be done control the veldfires during the winter season?	Johan Kemp, IAP response form, 26/03/2015	Relevant management plans are provided in section 20 of the EIA and EMP.
Socio-economic: social related issues			
Social ills	We are concerned about crime. There is already a problem with crime in the area because of Mondri. This proposed project has the potential to escalate the crime such as vehicle theft.	Nel Marie Mahne & Johan Mahne (surrounding landowner), meeting, 07/11/2014	Your concerns are noted. Socio-economic related issues will be addressed as part of the EIA process. Refer to Section 6.4.11 for the terms of reference for the specialist study.
	Crime is a big issue in this area, to an extent that farmers are being murdered. Since there will be an influx of people to the area there is a greater chance of crime increasing.	Johan Mahne (Landowner and Farmer), Public scoping meeting, 26/03/2015	
	What are the mines plan to control the influx of people which will lead to a number of issues such as housing, sewage, and infrastructure?	Pat Collins (Utrecht Municipality), Public scoping meeting, 26/03/2015	
Housing	With no housing plan this will lead to another Marikana issue.	J. P Snijders, Public scoping meeting, 26/03/2015	As part of Tholie Logistics' values they do not believe in on-site housing based on past experiences. Tholie Logistics has seen that local towns can benefit from supplying housing to employees. Transport is then provided to transport employees to the proposed mine site (Heye Daun, Tholie Logistics).
	What is the mines housing plans?	Johan Kemp, IAP response form, 26/03/2015	
	No provision is made by Tholie for adequate housing, clinics, schools and other social infrastructure for mine workers, their families, and suppliers of the mine and their workers.	J. P Snijders, Scoping report comments, 22/05/2015	In relation to housing, see response above. Further detail will be provided in the EIA. Any social investment or local economic development project will be informed by the project's social and labour plan (SLP). The SLP considers both the workforce and receiving communities and is structured in a manner that supports local government's initiatives. For socio-economic related issues, these will be addressed as part of the EIA process. Refer to Section 6.4.11 for the terms of reference for the specialist study.

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Pressure on services	Any economic activity, especially mining, attracts large number of people to the area. This influx occurs regardless of the realistic employment prospects at the mine itself. The mine will create income which will be exploited by a vast array of other business activities. This area is one of the last, unspoilt, high agricultural and tourism potential zones in KwaZulu-Natal. It is also very remote. Getting municipal services to the area is unlikely. People will therefore exploit the environment for their basic needs without any controls or mitigation. This is always beyond the control of the mine but will create demands that this municipality will be hard-pressed to meet.	Amajuba District Municipality, Scoping Report comments, 10/06/2015	Your comment is noted for consideration by the decision-making authorities.
Resettlement	What will happen to the people that are settled on the proposed mine area? Will they be relocated and/or compensated?	Paul Zwane, Public scoping meeting, 26/03/2015	Socio-economic related issues will be addressed as part of the EIA process. Refer to Section 6.4.11 for the terms of reference for the specialist study.
	What is going to happen to the people living on the proposed project area?	Sindisiwe Zwane, IAP response form, 26/03/2015	
	There exists a number of homes adjacent to the proposed mine entrance. Some of these homes (at least) will have to be relocated before any mine related activity commences. A detailed plan in this regard will be required.	Amajuba District Municipality, Scoping Report comments, 10/06/2015	
Social investment	There has always been mining projects in this area and we support these projects but the promises made have never been fulfilled. What is this mine going to do to develop the local community?	Chief Mabaso, Public scoping meeting, 26/03/2015	Socio-economic related issues will be addressed as part of the EIA process. Refer to Section 6.4.11 for the terms of reference for the specialist study.
	How does the mine plan to develop community facilities such as educational facilities, network reception, health services and housing? The mine should also have plans to train the local people.	Bhekinkosi Zwane (Chief), Public scoping meeting, 26/03/2015	
	In terms of the development within the community, will the community have to wait 10 years to see the development?	Nomusa Shabungu, Public scoping meeting, 26/03/2015	
	How will the community benefit from the proposed project?	L. V Sibeko, IAP response form, 26/03/2015	
	How exactly, what type and to what extent will sustainable support for small scale farmers and commercial farmers be implemented?	Impala Water Users Association, Scoping Report comments, 22/05/2015	
	We would like to see the mine build roads, bridges, clinics and supermarkets in the area that will help mineworkers and also the community	Phindi Mtshali, Scoping report comments, 21/05/2015	

Subject	Issue / Question / Comment	By whom, how and when	Response given by the project team and reference to relevant section of the report (where applicable)
Socio-economic: employment and skills training			
Employment	Please clarify the job opportunities for the community with regards to the permanent and temporary jobs.	Dawie Cronjje (Impala Water Users Association), Public scoping meeting, 26/03/2015	The proposed mine has the potential to create 160 construction jobs and 200 operational jobs (see Section 3 of the report).
	Main concerns among the residents in the area is the high rates of unemployment	Local gathering by men on the Rooipoort farm, Social scan, 05/03/2015	Socio-economic impacts are assessed in section 8 of the EIA and EMP report, with management plans provided in section 20.
	Unemployment is a big issue in this area so what is the mines entrance strategy to develop the skills of the people living in the area?	Pat Collins (Utrecht Municipality), Public scoping meeting, 26/03/2015	
	As the youth we don't have skills, how will the mine promise us these jobs?	Phindile Buthelezi, Public scoping meeting, 26/03/2015)	
	My interest in the project is the job opportunities and the development that this mine will bring to the area.	Phindi Mtshali, Scoping report comments, 21/05/2015	
	What I understand from what you are saying is that most of the jobs will come from the outside.	Holger Eckhard, Public scoping meeting, 26/03/2015	The plan is to recruit locally as far as possible however certain skilled services may need to be sourced from outside areas.
	Is Tholie Logistics owned by the government? If so why is the mine only proposing temporary jobs?	P. J Msibi, Public scoping meeting, 26/03/2015	Tholie Logistics is not government owned. It is a private company. Construction and operational phases of a mine often require different sets of skills. That's why temporary jobs are often considered for construction.

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Employment	As you have mentioned the surrounding area has socio-economic issues and low education levels so how can the local people be sure that they will be employed over the skilled professionals from Johannesburg?	Ayanda Nzimande (WWF SA), Public scoping meetings, 26/03/2015	Socio-economic impacts are assessed in section 8 of the EIA and EMP report, with management plans provided in section 20.
	The problem with the white community in the area is that they under-pay the farm workers so they are afraid of losing their labourers if the proposed mine goes forward.	L. V Sibeko, IAP response form, 26/03/2015	
	Is there an age limit for the proposed job opportunities?	Sindisiwe Zwane, IAP response form, 26/03/2015	
	The unemployment rate in the community is very high.	Sizwe Vundla, IAP response form, 26/03/2015	
	Our communities are very poverish therefore the job opportunities will make a big difference in our lives.	Sizwe Vundla, IAP response form, 26/03/2015	
	Job creation, numbers of local workers (Farm and Utrech inhabitants) to be employed and taking cognizance that local Zulu speaking people will not work underground.	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	
Training	What type of skills will the mine provide to the community?	L. V Sibeko, IAP response form, 26/03/2015	
	The proposed mine should train the local community to better the chances of job opportunites	Sindisiwe Zwane, IAP response form, 26/03/2015	
Socio-economic: economic			
Cost benefit analysis	MTPA recommends that a risk assessment is done which includes a financial viability - cost/benefit analysis including water purification for a hundred years afterwards	Mpumalanga Tourism and Parks Agency, Scoping report comments, 25/05/2015	A cost benefit analysis has been provided as part of the economic specialist study (see Section 8 of the EIA and EMP report).