

Annex G

Comments Received and Comments and Responses Report

Comment and Response Report: Draft Scoping Report

ESIA for the Proposed Gamsberg Zinc Mine and associated infrastructure

S.No	Comments/Issues and Suggestions Raised	Commentator	Organisation	Date	Source	Response	Category
1	Small local contractors should be informed who the bigger contractors are that have been awarded jobs. This would help the smaller contractors market themselves well.	Eugene Koegelberg	Aggeneys community	29-Nov-12	Aggeneys Meeting	Thank you for this suggestion, recommendations will be made in the ESIA phase, in line with BMM's commitments, to facilitate and ensure that the use of local content is maximised during project implementation.	Economic Development
2	Having the new housing development at Pella will stimulate economic growth and provide opportunities for the opening of new stores.	Alfred Waterboer	Land owner	29-Nov-12	Telephonic Consultation	The economic and social impacts related to the project and associated alternatives will be reviewed and assessed. The findings of the economic assessment will be presented in the Draft ESIA Report. The current proposed locations for housing development include the towns of Aggeneys, Springbok and Pofadder. However, the Mining Charter will inform the decision on the preferred location.	Economic Development
3	How were the decisions regarding the powerlines be taken in terms of the studies to be conducted?	Kevin Anderson	Orelight	27-Nov-12	Pofadder Public Meeting	The specialist studies that will be presented in the Draft ESIA Report will assess impacts associated with the proposed power infrastructure and alignment thereof.	Electricity
4	Can Black Mountain Mining cooperate with all the solar power projects in the area?	Abrie van Niekerk	Farmer	28-Nov-12	Focus Group Meeting	BMM supports the use of renewable energy sources for generation of electricity however, the baseload requirements to operate the mine and the concentrator plant can not be met by renewable energy sources.	Electricity
5	The mine should consider the development of renewable energy and not the building of a new substation.	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	The substation will be required to facilitate electricity distribution and it is anticipated that it would be required irrespective of the energy source.	Electricity
6	The new substation should be able to supply the surrounding areas with electricity. This could in a way encourage the development of renewable energy sources.	Amanda Bourne	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	We appreciate your prespective.	Electricity
7	Contractors or workers from outside Khai-Ma Municipality should be awarded short term contracts to avoid staying in the area for too long and limiting the job opportunities for local residents.	Louisa Coetzer	Pofadder Community	27-Nov-12	Pofadder Public Meeting	A social impact assessment will be compiled and presented in the Draft ESIA Report. In addition, the preparation and compilation of a Social Labour Plan (SLP) is legally required by BMM. Employment in the local municipal area will be prioritised. Furthermore, on-the-job training will be promoted to ensure the development of the required skills.	Employment
8	People must be informed on the subjects or courses needed in order to qualify for employment at the mine.	Karina Christells	Pofadder Community	27-Nov-12	Pofadder Public Meeting	A SLP will be compiled which will outline the employment opportunities and associated skills/ qualifications required.	Employment
9	People in the area don't want to work. What can be done to ensure that people are kept interested in the project?	Tersius Visser	Farmer	28-Nov-12	Focus Group Meeting	Thank you for your comment. This will be forwarded for consideration into the compilation of the social impact assessment as well as the SLP.	Employment
10	There should be laws and agreements with the local municipality to ensure that in order for the mine to operate it should employ the local residents.	Maria Vos/Swarts	Pella community member	28-Nov-12	Pella Public Meeting	Please refer to Response above.	Employment
11	What will the impacts of dust, waste water and groundwater be on the surrounding area?	Danie Jacobs	Farmer	28-Nov-12	Focus Group Meeting	Air quality, waste management and hydrogeological impact assessments will be undertaken, with the findings presented in the Draft ESIA Report. The potential impacts associated with dust and contaminated water will be assessed, with suitable mitigation measures suggested.	Environmental Impacts
12	Can the potential pollutions be determined before-hand so that farmers can be prepared for when they materialise?	Girrie vd Heever	Pofadder Landbou Vereniging	28-Nov-12	Focus Group Meeting	The potential impacts on air quality and water (surface and groundwater) pollution can be predicted, based on baseline investigations and predictive modelling. However, the specialist studies can only provide an indication of the potential impacts. On-going monitoring at sensitive receptors will be required during the construction and operational phases of the project.	Environmental Impacts
13	Option two of the slimes dam can have serious impacts on a particular farmer's land.	Pieter Jacobs	Farmer	28-Nov-12	Focus Group Meeting	The socio-economic and bio-physical impacts associated on adjacent and surrounding landowners will be assessed and presented in the Draft ESIA Report. The ESIA report will also elaborate on site layout alternatives (ie shifting of infrastructure to avoid potential impacts, where possible).	Environmental Impacts

14	How will cyanide dust, that is possibly going to be blown in the area, affect the ecology?	Danie Gerber	Farmer	28-Nov-12	Focus Group Meeting	The findings of the air quality impact assessment will assist the botanical specialist in determining the potential effects of dust impacts on ecology. This will be considered during the ESIA phase.	Environmental Impacts
15	There should be plans for mitigation and rehabilitation in the early stages of the project and not once the impacts have occurred.	Amanda Bourne	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	Agreed, upon completion of the specialist studies, suitable mitigation and rehabilitation measures will be recommended in the ESIA for pre-construction, construction and operation phases of the project.	Environmental Impacts
16	Offsetting is inevitable as there will be damages incurred upon the environment.	Ralph vd Poll	Department of Environment and Nature Conservation	29-Nov-12	NGO Focus Group Discussion	Based on preliminary analyses, it appears that impact on sensitive areas may be unavoidable especially in relation to the positioning of the ore body. The extent of these potential impacts will be assessed and mitigation measures investigated. Offsetting will be required where residual impacts on particularly sensitive areas can not be reduced to acceptable levels.	Environmental Impacts
17	Houses should be built in either Springbok or Pofadder but not in Aggeneys to avoid development of a ghost town.	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	The decision on housing location is pending and will be informed by the Mining Charter.	Housing
18	Pofadder is a suitable area of the extension/expansion of houses for the mine workers.	Abe Koopman	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	Please refer to Response above.	Housing
19	What is the exact location where houses are proposed to be built in Aggeneys?	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	The area that could be used in Aggeneys is located between the existing southern and northern townships.	Housing
20	The proposed housing to be built needs to be expanded to Pella and Pofadder and should not only be focussed at Aggeneys.	Alfred Waterboer	Land owner	29-Nov-12	Telephonic Consultation	Please refer to Response 17 above.	Housing
21	What will happen to all the network towers located on the mountain?	Danie Jacobs	Farmer	28-Nov-12	Focus Group Meeting	Whether or not it will be necessary to relocate these towers will be informed by engineering design studies currently underway however, connectivity will be a priority for operations.	Other
22	The mine is definitely welcomed however, there should be cooperation between the mine and the community.	Petrus Jantjies	Pella community member	28-Nov-12	Pella Public Meeting	An on-going social engagement plan will be proposed to ensure that Black Mountain Mining and the surrounding communities maintain continual interaction at a construction and operational phase.	Other
23	ERM should get a copy of Ninham Shand report on Koegelberg port for more information and reference data.	Andy Pienaar	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	Ninham Shand Pty Ltd was closed in 2007 and merged with two other companies to form Aurecon. ERM will endeavour to source the report and forward to Black Mountain and the engineering team for consideration.	Other
24	The Gamsberg project should not be a reflection of the previous projects in the sense that people's hopes are raised then the project doesn't get off the ground.	Andy Pienaar	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	Black Mountain recognises the associated business risks taken by surrounding farmers and businesses in anticipation of the proposed Gamsberg mine. Due to rising costs of power and unstable zinc prices, at the time of completion of the original EIA process, the project was unable to proceed. It must be noted that similar factors could potentially impact the viability of this project, however, this can not be predicted or anticipated for now. These are the risks inherent in any project.	Other
25	What are the benefits for Khai-Ma community from this project?	Charles JC Afrika	Pofadder ANC Youth League	15-Nov-12	Written Comment	The bio-physical and socio-economic benefits associated with the project will be assessed and presented in the Draft ESIA Report.	Project Benefits
26	Before the mine right/Environmental Authorisation is granted it should be provided for or indicated (with proof) that security measures have been discussed.	Girrie vd Heever	Pofadder Landbou Vereniging	28-Nov-12	Focus Group Meeting	Specific security measures associated with the construction, operational and decommissioning phases of the proposed Gamsberg mine will be included into the Environmental Authorisation.	Project Security
27	Will the zinc extraction process be done chemically – via the utilisation of cyanite? If so it will cause major problems or impacts.	Danie Gerber	Farmer	28-Nov-12	Focus Group Meeting	This process is used globally for zinc extraction and well defined and robust procedures and processes exist to avoid and minimize any impacts. These will be incorporated into mine management procedures as well as strict following of MSDS is ensured in handling of this hazardous material safely.	Project Specific
28	The proximity of the proposed mine location to my farm could have negative impacts on my farm.	Abrie van Niekerk	Farmer	28-Nov-12	Focus Group Meeting	Please refer to Responsee 15 above.	Project Specific

29	People are relatively negative towards Black Mountain Mining because of the previous experiences with regards to the mine construction not taking place previously.	Louis Hugo	Pella community member	28-Nov-12	Pella Public Meeting	Please refer to Response 24 above.	Project Specific
30	Does the property where the project location is proposed belong to the Municipality or to Black Mountain Mining?	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	The proposed mine and associated infrastructure will be located on Black Mountain Mining property.	Project Specific
31	What is the total size needed for the mine?	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	The specific dimensions of all associated infrastructure will be finalised during the Impact Assessment phase.	Project Specific
32	Has the project been delayed or moved in terms of scheduling? Because in previous meetings it was indicated that the mine would start much earlier.	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	There has been a minor delay in the overall ESIA timeframe. A revised schedule will be provided in the Draft ESIA Report.	Project Specific
33	Black Mountain Mining should plan and invest in the future as they are aware the lifespan of the mine is approximately 20 years.	Community Member	Aggeneys community	29-Nov-12	Aggeneys Meeting	The Draft ESIA Report will assess the impacts associated with the decommissioning and post mining landuse associated with the proposed Gamsberg mine.	Project Specific
34	How will Black Mountain Mining ensure that the proposed mine will be sustainable for the long term?	Albertus Roux	Pofadder Land owner & Farmer	23-Nov-12	Telephonic Consultation	Mitigation measures will be presented in the Draft ESIA Report, which will focus on the post mining landuse and "Legacy effect" resulting from the future closure of the mine.	Project Specific
35	Attention must be brought to the community regarding Vedanta's international records.	Kevin Anderson	Orelight	27-Nov-12	Pofadder Public Meeting	Information of Vedanta's community engagement and sustainability performance is given in their sustainability report which is available on Vedanta's website.	Public Participation
36	Public participation meetings should also be advertised on local radio stations.	Dirk Julie	Pofadder Community	27-Nov-12	Pofadder Public Meeting	This mode of communication will be considered in future engagement activities.	Public Participation
37	The DSR is not easily accesible from the library.	Girrie vd Heever	Pofadder Landbou Vereniging	28-Nov-12	Focus Group Meeting	The Draft Scoping Report has been lodged at public libraries, Municipal Offices and on the ERM website. An electronic copy of the Report will be made available, upon request.	Public Participation
38	How many people have been to the library to view the DSR?	Girrie vd Heever	Pofadder Landbou Vereniging	28-Nov-12	Focus Group Meeting	The venues at which the Scoping Report was lodged, have not kept a record of the number of people accessing the report.	Public Participation
39	Can farmers be notified in advance of the different specialists coming to their farms for their studies?	Abrie van Niekerk	Farmer	28-Nov-12	Focus Group Meeting	Please note that most specialists have already been to site to compile the baseline analysis and inform the suggested layout planning through the provision of sensitivity mapping. Additional site visits may be required, should there be substantive changes to the project description. The Pofadder Landbou Vereniging will be notified, if additional specialist site visits will be required.	Public Participation
40	Where are the councillors and why aren't they included in these meetings?	John Christian	Pella community member	28-Nov-12	Pella Public Meeting	The commenting and competent authorities have been notified and invited to the public meetings.	Public Participation
41	People from Witbank should also be consulted to help them understand the project vision.	Abe Koopman	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	Black Mountain Mining has previously confirmed that the towns of Witbank and Onseepkans will be consulted as part of the Social Labour Plan process, and remain outside of the regulatory ESIA process.	Public Participation
42	Local organisations and contractors should be kept informed and involved in the Gamsberg Project.	Mark Kemp	Aggeneys community	29-Nov-12	Aggeneys Meeting	All registered Interested and Affected Parties will be kept updated of the ESIA process as it progresses.	Public Participation
43	There are concerns about the security of livestock during construction and operations of the proposed mine.	Albertus Roux	Pofadder Land owner & Farmer	23-Nov-12	Telephonic Consultation	The potential impacts of theft on livestock will be assessed and presented in the Draft ESIA Report, together with suitable mitigation measures.	Security
44	The youth must be skilled and developed to be employable by the mine.	Andries Swartz	Pofadder Community	27-Nov-12	Pofadder Public Meeting	Suitable mitigation measures will be presented in the Draft ESIA Report to ensure that local community members are given the opportunity to obtain the required skills to improve employment potential.	Skills Development
45	The specialised contractors from outside Khai-Ma Municipality must transfer skills to local residents during their work contracts.	Louisa Coetzer	Pofadder Community	27-Nov-12	Pofadder Public Meeting	The Social Impact Assessment and the SLP will address the need and mechanisms to facilitate the transfer of skills.	Skills Development
46	Development should not only start with matriculants but also with younger pupils such as grade 10 and grade 11.	Elie Nel	Pofadder Community	27-Nov-12	Pofadder Public Meeting	This suggestion will be passed on for consideration during development of the SLP.	Skills Development
47	Local residents should be trained in advance for the jobs that are coming when the mine opens.	Maria Vos/Swarts	Pella community member	28-Nov-12	Pella Public Meeting	Thank you for your comment. This will be forwarded to the Social Specialist for consideration into the impact assessment as well as to the specialist undertaking the development of the SLP.	Skills Development

48	There are examples or experiments done in Kammiesberg where sheep herders are trained as researchers. This helps with skills development and information gathering for various studies	Amanda Bourne	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	Thank you for your comment. This will be forwarded to the Social Specialist for consideration into the impact assessment.	Skills development
49	In service training needs to be implemented which will ensure that candidates for employment will be sourced locally and not from other areas.	Alfred Waterboer	Land owner	29-Nov-12	Telephonic Consultation	Thank you for your comment. This will be forwarded to the Social Specialist for consideration into the impact assessment.	Skills Development
50	Can the project invest in a study trust for high school pupils, particularly matriculants?	Charles JC Afrika	Pofadder ANC Youth League	15-Nov-12	Written Comment	Thank you for your comment. This will be forwarded to the Social Specialist for consideration into the impact assessment.	Socio-economic Development
51	What plans are in place to ensure that people of Khai-Ma are empowered through this project?	Kevin Anderson	Orelight	27-Nov-12	Pofadder Public Meeting	The benefits associated with the Gamsberg mine and associated infrastructure will be identified, assessed and enhanced (where possible) in the Draft ESIA Report. Ensuring empowerment at local level will be an important aspect addressed by the social impact assessment, economic assessment as well as the SLP which will be required to be in place prior to approval by DMR.	Socio-economic Development
52	Will the mine be beneficial to the local workers?	Dirk Julie	Pofadder Community	27-Nov-12	Pofadder Public Meeting	The benefits associated with the Gamsberg mine and associated infrastructure will be identified, assessed and enhanced (where possible) in the Draft ESIA Report.	Socio-economic Development
53	Police/municipality will not be ready/prepared for the influx of people that will be attracted into Pofadder by the mine.	Girrie vd Heever	Pofadder Landbou Vereniging	28-Nov-12	Focus Group Meeting	The potential impacts associated with influx will be assessed as part of the social impact assessment. Suitable mitigation measures will be presented.	Socio-economic Development
54	Communities need more than just jobs. Transformation in Pella is needed.	Etiene Magerman	Pella community member	28-Nov-12	Pella Public Meeting	Social upliftment and community development related to the Gamsberg project will be assessed, and enhanced (where possible).	Socio-economic Development
55	As a small farmer the concern is not about getting employment from the mine, however, it would be appreciated if the mine could provide some amount of water allowance to small farmers to be able to earn a living for themselves.	Petrus Jantjies	Pella community member	28-Nov-12	Pella Public Meeting	This comment will be passed on to BMM.	Socio-economic Development
56	How will the small farming community of Witbank benefit from this project?	Abe Koopman	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	The potential impacts of employment on the surrounding towns of Witbank and Onseepkans will be assessed in the Social Labour Plan development.	Socio-economic Development
57	Black Mountain Mining should work alongside the development guidelines from the District Municipality to ensure that people of Khai-Ma Municipality benefit from the project.	Ronnie Newman	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	Benefits associated with the proposed Gamsberg project will be prioritised in the Local Municipal area. BMM will seek alignment with the Municipal policies and guidelines, where possible, and include in the development of the SLP.	Socio-economic Development
58	Attention must be placed on how people lived before the mine was established so that those livelihood strategies can be developed. This would help people to be more independent of the mine.	Community Member	Aggeneys community	29-Nov-12	Aggeneys Meeting	Thank you for your comment. This will be forwarded for consideration into the social impact assessment and social labour plan.	Socio-economic Development
59	Mining activities for the proposed mine must not compromise our current and future farming activities.	Albertus Roux	Pofadder Land owner & Farmer	23-Nov-12	Telephonic Consultation	The potential impacts of the mine on surrounding land will be assessed and presented in the Draft ESIA Report. The predicted extent, magnitude, probability and significance of impacts will be released for public review and comment.	Socio-economic Development
60	The previous pipeline constructed by the mine had severe negative impacts on the tourist attraction/tourist hot spots in Pella.	Maria Vos/Swarts	Pella community member	28-Nov-12	Pella Public Meeting	The potential impacts of the proposed Gamsberg mine on tourism will be assessed and presented in the Draft ESIA Report.	Tourism
61	Succulents found in the area need to be allocated at a central place together with a guest house in order to stimulate tourism. Pella is favourably positioned for such a development.	Alfred Waterboer	Land owner	29-Nov-12	Telephonic Consultation	A botanical impact assessment will be undertaken, with the findings presented in the Draft ESIA Report. We will forward this recommendation to the botanical specialist for consideration.	Tourism
62	The conditions of roads will decline with increased usage from the mine transportation. The preferred option should be railway.	Abe Koopman	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	The transport option of road and rail is currently being explored as part of the ESIA process from Loop 10 to Saldanha Port. The potential impacts of utilising the N14 and N7 will be assessed and presented in the Draft ESIA Report.	Transport

63	The rail way should be connected to the Port Nolloth and Koegelberg Port These could serve as alternatives to Saldanha Bay.	Andy Pienaar	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	The feasibility to construct a new Port at Port Nolloth is currently being investigated by BMM. However, for purposes of this ESIA process, the option to use the Port of Saldanha will be considered.	Transport
64	Will farmers be able to use the railway line once it is constructed?	Bertus Roux	Farmer	28-Nov-12	Focus Group Meeting	The scope of the project does not include the construction of a new railway line.	Transport
65	Visual impacts is of concern to the surrounding area.	Theron Bezuidenhout	Pofadder Community	27-Nov-12	Pofadder Public Meeting	A detailed visual impact assessment will be undertaken and presented in the Draft ESIA Report.	Visual Impacts
66	All harmful waste should be taken care off and disclosed.	Andy Pienaar	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	A waste management and classification study will be undertaken and presented in the Draft ESIA Report. A waste inventory will be generated, together with suitable management measures.	Waste
67	The increase of new people in the area (Pofadder, Pella) will require that an improvement in the waste management systems of the towns be undertaken.	Abe Koopman	South African National Biodiversity Institute	29-Nov-12	NGO Focus Group Discussion	The waste management facilities at Pella and Pofadder are controlled and managed by local government. A recommendation will be made to BMM to initiate contact with the local government to explore potential inter-dependent agreements around waste management.	Waste
68	The mine must avoid water pollution.	Johannes Bezuidenhout	Pofadder Community	27-Nov-12	Pofadder Public Meeting	The potential impacts to surface and groundwater will be assessed and presented in the Draft ESIA Report.	Water
69	Concerned about the pollution or impacts on ground water.	Deon Petersen	Farmer	28-Nov-12	Focus Group Meeting	A detailed hydrogeological impact assessment will be undertaken and presented in the Draft ESIA Report.	Water
70	Groundwater is the only source for water in the area. The studies are very important and it should be seen to that groundwater is not polluted.	Amanda Bourne	Conservation South Africa	29-Nov-12	NGO Focus Group Discussion	Please refer to Response 68 above.	Water
71	Concerned about the pollution or impacts on groundwater.	Deon Petersen	Farmer	28-Nov-12	Focus Group Meeting	Please refer to Response 68 above.	Water
72	Groundwater is the only source for water in the area. The studies are very important and it should be seen to that groundwater is not polluted.	Amanda Bourne	Conservation South Africa	29-Nov-12	Focus Group Meeting	Please refer to Response 68 above.	Water
73	Vedanta/Black Mountain Mining needs to perform a detailed study on the potential of air pollution to be created by the dust particles (aerosol) that such mining activities could generate. A radius of at least 100km must be examined to assess the impacts on humans, plants and live stock in the short and long term.	Aviv Garten	Orelight	10-Dec-12	Written Comment	An air quality impact assessment will be undertaken for the proposed Gamsberg mine and presented in the Draft ESIA Report. Dispersion modelling will be undertaken for expected pollutants, including dust.	Air quality
74	Dust buckets must be set up at receptor sites including the Orelight SA farm.	Aviv Garten	Orelight	10-Dec-12	Written Comment	Thank you for your comment. This will be forwarded to the air quality specialist, for consideration into the air quality impact report.	Dust
75	Dispersion modelling must be installed for the prediction of ambient concentration in the air of pollutants emitted to the atmosphere due to the mining activities.	Aviv Garten	Orelight	10-Dec-12	Written Comment	Please refer to Response 73 above.	Air quality
76	There should be PM10 and PM2.5 monitoring done for health and safety purposes.	Aviv Garten	Orelight	10-Dec-12	Written Comment	Thank you for your comment. This will be forwarded to the air quality specialist, for consideration into the air quality impact report.	Air quality
77	Vedanta/Black Mountain Mining must compile a detailed study on the potential blasting and drilling affects that the proposed mining activities could generate. Specifically studies studies must be performed to assess the blasting zone radius.	Aviv Garten	Orelight	10-Dec-12	Written Comment	A detailed noise and vibration impact assessment will be undertaken and presented in the Draft ESIA Report. The potential noise and vibration impacts associated with all relevant project components will be assessed and mitigated.	Blasting
78	A traffic Impact Assessment on the two proposed routes to determine the impacts the transportation of the concentrate will have.	Aviv Garten	Orelight	10-Dec-12	Written Comment	A detailed traffic impact assessment will be undertaken and presented in the Draft ESIA Report.	Transport
79	Concerned about the possibility of groundwater pollution and how the mine plans to address those impacts.	Gert Visser	Land owner	12-Dec-12	Written Comment	Please refer to Response 68 above.	Water

80	The influx of people in the area is of great concern as it poses security risk for the farmers and their families.	Gert Visser	Land owner	12-Dec-12	Written Comment	Please refer to Response 53 above.	Security
81	What is the policy regarding the employment of foreigners, e.g. what is the duration of the contracts that will be offered?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	Vedanta Plc, is investing significantly into the proposed mine both financially and intellectually and both Vedanta and BMM are committed to skills transfer and development of local content.	Other
82	Which positions will be filled by foreigners or "expats"?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	In general, skills shortages are evident in the highly skilled professional positions.	Employment
83	Will skills transfer be done by the foreign contractors during their contract term?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	BMM is supportive of skills transfer and this is an area where BMM sees an opportunity to enhance project benefits at a local scale.	Skills Development
84	Will Vedanta start to train local workers in order to fill the technical positions within Gamsberg once the mine becomes operational?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	The on-going training and skills transfer to local employees will be requested to enhance the project benefits to the local communities.	Skills Development
85	Will local FET colleges be used to train workers?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	It is anticipated that there will be both internal and external training opportunities for employees.	Skills Development
86	How many bursaries have been awarded to local students in 2011, 2012 and how many are being considered for 2013?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	The development of the Gamsberg mine is still in the feasibility and permitting phase and a formal development programme has not yet commenced.	Skills Development
87	How will the dust, generated by the open cast mine, affect the environment and the surrounding area.	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	Please refer to Response 73.	Dust
88	How will the tailings dams be rehabilitated at the end of the mining operations?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	Recommendations around remediation and rehabilitation of the proposed tailings facility will be presented in the Draft ESIA Report as well as the Mine Closure Plan.	Rehabilitation
89	What is the effect of cadmium and lead in the waste/slime with specific reference to groundwater contamination?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	A geochemical assessment incorporating leachate testing is being undertaken and the findings of this assessment will feed into the hydrogeological impact assessment to assess the impacts of the proposed mine on groundwater resources. The findings of these studies will be presented in the Draft ESIA Report.	Water
90	What is the effect of open pit mining, to the extend that it is envisaged, on the quality and sustainability of groundwater resources affecting farming and human habitation in the area?	Annas vd Merwe	Community Member	12-Dec-12	Written Comment	Please refer to Response 68 above.	Water
91	The impact of dust from waste rocks that are containing hazardous metals from the rock dump site is a concern for biodiversity.	Deon Petersen	Land owner	12-Dec-12	Written Comment	Please refer to Response 73 above.	Dust
92	Will the transportation of mined material also cause dust pollution which could affect plants that are consumed by animals?	Deon Petersen	Land owner	12-Dec-12	Written Comment	The transportation of ore, zinc concentrate and waste rock will result in the generation of dust. The potential impacts of dust on surrounding vegetation and fauna will be assessed and presented in the Draft ESIA Report.	Dust
93	There are high possibilities of groundwater being polluted by the process of the waste management or tailings facilities of the mine. This will affect all the surrounding areas.	Deon Petersen	Land owner	12-Dec-12	Written Comment	Please refer to Response 68 above.	Water
94	The winter winds in the area will blow hazardous material from the tailings dams into neighbouring farms and affect biodiversity and human life.	Deon Petersen	Land owner	12-Dec-12	Written Comment	Please refer to Response 73 above.	Environmental Impacts
95	The mining processes will lead to the declining of the groundwater table. How will the mine mitigate this impact?	Deon Petersen	Land owner	12-Dec-12	Written Comment	Please refer to Response 68 above.	Water

96	This is the first time (as a landowner) that one gets any information regarding the new project. It would be appreciated if information was provided particularly regarding the tailings.	Deon Petersen	Land owner	12-Dec-12	Written Comment	Figure 3.1 of the the Draft Scoping Report contains detailed layout plan for the two options currently being considered for the proposed Tailings facility. However, through the compilation of sensitivity maps, the layout of the proposed tailings facility will be refined and presented in the Draft ESIA Report.	Public Participation
97	Security concerns arising from the influx of construction workers must be addressed and handled as a matter of urgency.	Deon Petersen	Land owner	12-Dec-12	Written Comment	Please refer to Response 53 above.	Security
98	A certain portion of the farm Gams 60 will not be eligible for farming should the mine project commence.	Deon Petersen	Land owner	12-Dec-12	Written Comment	Thank you for your comment. ERM will engage directly to understand the location and explanation for the potential sterilisation of a certain part of farm Gams 60.	Other
99	In 2000 Dr Philip Desmet determined Gamsberg to be the most important inselberg in the Bushmanland Inselberg Region (BIR) for the conservation of biodiversity. The conservation of this inselberg and the ecosystem services it provides is critical to sustain the broader Succulent Karoo Biome and the goods and services local people derive from the landscape. The past endeavours by the Bushmanland Conservation Initiative to secure a formally protected area centred on Gamsberg should rather be built upon; a far more suitable development of this area.	Tania Anderson	McGregor Museum	11-Nov-12	Written Comment	The sensitivity of the environment is acknowledged as well as Dr Phillip Desmet's experience working in this area. It is for this reason that he has been appointed as the Botanical Specialist. An ecological sensitivity map has been prepared by the ESIA specialists to identify particular areas of sensitivity. This sensitivity map is being used by the engineers to inform the layout design of key infrastructure to ensure avoidance as the first step in mitigating potential impacts. The layout design has therefore been an iterative process with input from the engineering team and ESIA team. In addition to this, the specialist reports will assess the impacts on ecology on a local and regional level and provide additional recommendations and mitigation measures. A more detailed discussion will be included in the Draft ESIA Report.	Sustainable Development
100	The initial flora specialist study for the Gamsberg EIA (Anderson for Envirolink 2000) concluded that the high negative impact expected from open-pit mining activities would be unacceptable and a fatal flaw in terms of the effects on the vegetation and biological processes. Further, the scale of the impact cannot be adequately mitigated, and mitigation would not be economically feasible.	Tania Anderson	McGregor Museum	11-Nov-12	Written Comment	Thank you for this comment. This report along with investigations undertaken since then will be considered during the ESIA process. The botanical impact assessment will identify and assess potential impacts and recommend appropriate mitigation measures. The ability to avoid and minimise potential impacts and details of offset planning (based on the current knowledge of the area, this seems inevitable) will be outlined and assessed in the Draft ESIA Report. Black Mountain will have to consider the financial implications associated with mitigation measures and possible offset costs, in their financial planning for the project.	Environmental Impacts
101	The maps of Critical Biodiversity Areas (CBA) for the Namakwa District Municipality and Khai Ma Local Municipality show that Gamsberg has Irreplaceable Sites/Critical Biodiversity Areas (CBA1) and guidelines state that certain activities, including mining, are unsuitable in these areas if we are to ensure biodiversity conservation. It should be seen to that these guidelines are implemented and that mining does not take place on the CBA1	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Thank you for your comment. The Irreplaceable CBAs, Important CBAs and Ecological Support Areas as identified in the Namakwa Critical Biodiversity Areas mapping are considered in the ESIA process and this information in addition to the occurrence and potential occurrence of species of conservation concern will be used to assess the magnitude of impacts associated with proposed development. The impact assessment will also consider the sensitivity map compiled by the ESIA specialists and describe the manner in which the engineering team has been able to adjust the layout to avoid sensitive areas, where possible. In addition, a detailed botanical and faunal impact assessment will be undertaken and integrated into the Draft ESIA Report. These specialist studies will identify and assess all potential impacts and provide suitable mitigation. The Draft ESIA Report will provide recommendations, based on the outcomes of the specialist studies.	Fauna

102	Gamsberg supports plant species which are only known from less than five localities, for e.g. Brunsvigia gariensis, Trachyandra sp.nov., Othonna sp. nov. and the three dwarf forms of Conophytum species. The botanical specialist is probably aware of the presence of Brunsvigia gariensis at Gamsberg, and that it is endemic to Pellaberg and Gamsberg (Snijman 20112), and I'm sure it will be added to the list of Species of Special Concern in the Final Scoping Report (FSR) and BOTANY DEPARTMENT & KMG HERBARIUM Ref: MMK 12 Date: 11 November 2012 ESIA. A specimen was collected in 1999 during the flora survey for the EIA, which recorded 344 plant species at Gamsberg (see Anderson 20051).	Tania Anderson	McGregor Museum	11-Nov-12	Written Comment	Thank you for your comment. Lists of species of special concern will be presented in the Draft ESIA Report and associated specialist studies, for public review and comment.	Flora
103	Biodiversity offsetting guidelines state that residual impacts in Critical Biodiversity Areas and irreplaceable sites are usually very high, and in this case offsets cannot compensate for the irreversible and irreplaceable loss of biodiversity and ecosystem integrity, and should not be considered. An offset for Gamsberg would not be appropriate according to the offset guidelines	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	The ESIA process will taking into account the Irreplaceable CBAs, Important CBAs and Ecological Support Areas as identified in the Namakwa Critical Biodiversity Areas mapping and will use this information in addition to the occurrence and potential occurrence of species of conservation concern to assess the magnitude of impacts. Part of this process will be to take into consideration any concerns raised by I&APs such as comments provided by BirdLife South Africa. Recommendations coming from this process will be to avoid and/or mitigate impacts and will be detailed in the faunal and floral specialist reports. Any residual impacts remaining will then trigger the need for offsetting, which at this stage is seemingly inevitable. In order to properly conduct an offset program in light of the proposed project it will be critical to have a more detailed understanding of the surrounding inselbergs and plains habitats before such an offset can be conceivable. Regional studies are currently being undertaken to inform this process. Based on existing information and as mentioned above, offsetting with regards to this project appears to be inevitable. A core offset working group has therefore been constituted with representatives from Department of Environment and Nature Conservation (DENC), South African National Biodiversity Institute (SANBI) and ecological specialists. This working group is tasked with ensuring international, national and provincial guidelines and principles are considered and providing technical, procedural and implementation guidance on offset development.	Offsetting
104	If the offset guidelines for an irreplaceable CBA and the guidelines for protecting CBAs in the Namakwa DM and Khai Ma LM plans are ignored in Gamsberg's case, then there needs to be a very good motivation in the FSR and ESIA detailing why.	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please refer to Response 103 above.	Offsetting
105	We do not believe that a biodiversity offset for Gamsberg will be successful, based on previous experience in the region and the major issues with offsets. There are serious problems with the enforcement and implementation of biodiversity offsets nationally and globally. Often the offset plan is not completed during the EIA process and does not inform the RoD, it is not secured, and a detailed offset management plan is not included in the EMP.	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please refer to Response 103 above. The offset development process has been initiated and the working group established to ensure integration with the ESIA process and to ensure that the Environmental Authorisation speaks to the offset management plan and includes appropriate conditions which would be binding commitments.	Offsetting

106	Is the offset appropriate, practicable and can it be secured with a low risk of failure?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	These questions are important in developing a biodiversity offset plan and as mentioned above, a core offset working group has already been established to ensure a robust, defensible and implementable offset plan is developed. The specific details of the biodiversity offsetting process and the risks associated with implementation will be explored in more detail in the Draft ESIA Report.	Offsetting
107	Will 'like' communities, species, habitats and processes be replaced with 'like' and, if it is a 'trade-up', exactly what is being traded up?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please see Response 106 above.	Offsetting
108	Will the offset situation ensure that ecological interactions and processes are maintained?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please see Response 106 above.	Offsetting
109	Will there be a temporal gap, and will it compromise biodiversity persistence?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please see Response 106 above.	Offsetting
110	What is the risk and cost of offset failure and permanent loss, and who bears that risk?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please see Response 106 above.	Offsetting
111	Will the offsetting be implemented and audited?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please see Response 106 above.	Offsetting
112	An offset investigation would have to be very thorough (including solutions to all the concerns above) and the offset would probably mean trading up if it is deemed appropriate at all. To our current knowledge, there are very few similar sites to Gamsberg in the BIR. The only two inselbergs in the BIR that are similar, but not known to be exactly 'like for like' or of higher biodiversity value, are Groot Pellaberg and the Achab se berg – Namiesberg complex. Will either of these prove to be adequate trading up and be secured as an offset with guaranteed implementation before the RoD is issued?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	It is agreed that this will be a complex process, please also refer to Response 103 and 106.	Offsetting
113	It is stated under key issues that biodiversity offsets will be pursued after the mitigation hierarchy has been implemented (pg 142). Does this mean after the avoidance, minimizing, mitigation and rehabilitation (AMMR) measures have been investigated in the ESIA, rather than implemented?	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	The mitigation hierarchy will be effectively and appropriately applied, and residual impacts which cannot be sufficiently reduced by applying the mitigation hierarchy will need to be included and considered in the biodiversity offsetting process.	Offsetting
114	The offset guidelines require that offset studies must be done by a specialist in this field and be part of/run parallel to the EIA process, as the offset needs to inform the RoD. Adequate time must also be provided for a thorough offset study during the EIA process.	Caroline Ah Shene-Verdoorn & Tania Anderson	Bird Life South Africa & McGregor Museum	27-Nov-12	Written Comment	Please see Response 103 and 106 above.	Offsetting
115	The ESIA's flora specialist reports will hopefully include a list of protected species, which are also considered species of special concern (under the Northern Cape Nature Conservation Act of 2011, implemented Jan 2012). This is necessary because permits will be required from the Dept Environment and Nature Conservation should these species need to be removed. For the permit application, the localities of these species need to be geo-referenced and population sizes determined and recorded.	Tania Anderson	Bird Life South Africa & McGregor Museum	11-Nov-12	Written Comment	The Draft ESIA Report and associated botanical impact assessment report will reflect a list of protected species, which are considered to be of concern in terms of the Northern Cape Conservation Act of 2011.	Flora

116	Gamsberg is close to the Haramoep and Black Mountain Mine Nature Reserve Important Bird Area, and possible impacts from mining activities on this IBA need to be investigated by the fauna/avifauna specialist.	Tania Anderson	Bird Life South Africa & McGregor Museum	11-Nov-12	Written Comment	A specialist faunal team has been appointed to undertake a detailed impact assessment on faunal aspects related to the Gamsberg mine. The findings of this specialist investigation will be presented in Draft ESIA Report.	Project Location
117	BirdLife South Africa (BLSA) is particularly concerned about this application because Gamsberg borders the Haramoep and Black Mountain Mine Nature Reserve Important Bird Area (IBA), and mining activities (especially blasting) will impact on this IBA and therefore need to be investigated by the fauna/avifaunal specialist.	Caroline Ah Shene-Verdoorn	Bird Life South Africa	23-Nov-12	Written Comment	Please refer to Response 103, 106 and 116 above.	Project Location
118	The avian data for this application is deficient and needs to be addressed through comprehensive avian monitoring before this application is finalised.	Caroline Ah Shene-Verdoorn	Bird Life South Africa	23-Nov-12	Written Comment	The objective of the present faunal and floral studies are to incorporate previous surveys and address any gaps/shortfalls of earlier sampling efforts. In terms of avifauna, the faunal study will integrate findings from the earlier 1999 surveys of J.A. Harrison and D.M. Harebottle from the Avian Demography Unit. Additional information and data was nevertheless recorded during subsequent field surveys conducted by GroundTruth in April 2009 and November 2012. With the additional desktop information from the South African Bird Atlas 2 database, there is, in the opinion of the ESIA specialists, sufficient information available to establish the avifaunal baseline and inform the impact assessment process, which is currently underway. Please also refer to Response 103 above.	Fauna
119	The nearest SKA station is beyond 100km from the proposed mine.	Adrian Tiplady	SKA	14-Nov-12	Written Comment	Noted. Thank you for your comment.	Other
120	Based on distance to the nearest SKA station, and the information currently available on the detailed design of the mining installation, this facility poses a very low risk of detrimental impact on the SKA.	Adrian Tiplady	SKA	14-Nov-12	Written Comment	Noted. Thank you for your comment.	Other
121	Any transmitters that are to be established, or have been established, at the site for the purposes of voice and data communication will be required to comply with the relevant AGA regulations concerning the restriction of use of the radio frequency spectrum that applies in the area concerned.	Adrian Tiplady	SKA	14-Nov-12	Written Comment	Noted. Thank you for your comment.	Other
122	As a result of the very low risk associated with the mine near Pofadder, no mitigation measures would be required at this stage. However, the South African SKA Project Office would like to be kept informed of progress with this project, and reserves the right to further risk assessments at a later stage.	Adrian Tiplady	SKA	14-Nov-12	Written Comment	Noted. Thank you for your comment.	Public Participation

Comment and Response Report: Project Initiation Phase							
ESIA for the Proposed Gamsberg Zinc Mine and associated infrastructure							
No	Comment Received	Commentator	Organisation	Date	Source	Response	Category
1	Dust caused by operations will have a direct impact on the proposed solar power plant to be built on my land.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	An air quality impact assessment will be undertaken, with the findings presented in the Draft ESIA Report. The assessment will model the expected dispersion patterns and assess the associated air quality impacts.	Air quality
2	Is there any information available relating the impact of dust on the environment?	Amanda Bourne	Conservation South Africa	16-Aug-12	Focus Group Meeting	Please refer to Response 1 above.	Air quality
3	The proposed project will bring a lot of employment opportunities.	Albertus Roux	Landowner	27-Jul-12	Telephonic consultation	Thank you for your comment. The project is expected to generate between 2 500 to 3 500 construction phase jobs. The establishment of the proposed Gamsberg mine is expected to result in the generation of approximately 850 permanent jobs during operation. Furthermore, approximately 400 additional jobs will be created during operation for support services, in the form of security, cleaners, catering, gardening, and bus and clinic services.	Economic development
4	Farmers are willing to partake in the proposed project by providing services to BMM.	Albertus Roux	Landowner	27-Jul-12	Telephonic consultation	Thank you for your comment. Potential service providers will be forwarded to the applicant (Black Mountain Mining Pty Ltd). A service Provider database will be managed by the applicant.	Economic development
5	Enterprise development plans, as part of the proposed mine, should be considered and information provided to the public. This will ensure that local businesses are aware of potential opportunities in order to be prepared.	Nico Jano	Business Forum	16-Aug-12	Focus Group Meeting	This suggestion will be forwarded to the Black Mountain Mining for consideration.	Economic development
6	Local economic development opportunities should contribute to sustainable development in the area.	Lukas van Rooi	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	A macro-economic assessment will be undertaken. The assessment will identify and assess local, regional and national impacts associated with the project. The findings of the assessment, together with mitigation measures to enhance the potential economic benefits of the project, will be presented in the Draft ESIA Report.	Economic development
7	People should be empowered in such a manner that they are able to develop and uplift themselves through sustainable initiatives and not remain reliant on government grants.	Lukas van Rooi	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	Employment opportunities during the construction and operational phases of the Gamsberg mine will be prioritised in the local communities. Increased employment would potentially reduce dependencies on government grants. However, a social labour plan will be compiled (as part of the Department of Mineral Resources requirements). The SLP will review and consider community upliftment initiatives to skill members of the public to reduce their dependencies on the government and expand their employment potential.	Economic development

8	More information is needed about the power lines and sub-stations in order to understand the potential impact on the environment and farms affected by it.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	A detailed location of the power infrastructure associated with the Gamsberg mine will be presented in the Draft ESIA Report.	Electricity
9	With what capacity will electricity production be upgraded in order to fulfil in the new requirement for the mine?	Nico Jano	Business Forum	16-Aug-12	Focus Group Meeting	This will be confirmed during the ESIA phase.	Electricity
10	With the proposed development to enhance the electricity capacity with construction of substations and power lines will there be enough opportunity for the generation of renewable energy such as solar in the area?	Nico Jano	Business Forum	16-Aug-12	Focus Group Meeting	The project team is aware of a number of proposed renewable energy facilities in the area and so there are definitely opportunities for generation of electricity using renewable energy resources such as solar in the area. The electricity for the proposed development would be purchased from Eskom and it is anticipated that the bulk of the electricity supply would originate from conventional sources. BMM may facilitate the generation of renewable energy sources.	Electricity
11	Has the location for the proposed renewable energy project close to the Gamsberg been finalised?	Ronnie Newman	Conservation South Africa	16-Aug-12	Focus Group Meeting	Yes, the proposed solar farm is located to the west of the Gamsberg mine, along an adjacent property to the approved mining license area.	Electricity
12	Does the existing power station at Aggeneys have enough electricity to feed the proposed sub-stations to be contracted?	Ronnie Newman	Conservation South Africa	16-Aug-12	Focus Group Meeting	BMM are engaging with Eskom with regards to electricity capacity and this will confirmed during the ESIA process.	Electricity
13	Will BMM be utilising electricity developed from renewable energy sources such as solar power?	Amanda Bourne	Conservation South Africa	16-Aug-12	Focus Group Meeting	Renewable energy sources will not be utilised by the Gamsberg mine. The baseload requirements to operate the proposed zinc concentrator plant can not be met by renewable energy sources.	Electricity
14	Use of renewable energy will relieve the Namakwaland electricity pressures currently experienced and BMM should consider the use of these energy sources for the proposed project.	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	Please refer Response 13 above.	Electricity
15	Gamsberg is recognised as a environmental sensitive site and any developments within the area is concern for Conservation South Africa.	Amanda Bourne	Conservation South Africa	16-Aug-12	Focus Group Meeting	Thank you for your comment. A botanical and faunal impact assessment will be undertaken, with the findings presented in the Draft ESIA Report.	Environmental Impacts
16	The Background Information Document doesn't make reference to environmental studies to be conducted; will specialist studies form part of the ESIA?	Amanda Bourne	Conservation South Africa	16-Aug-12	Focus Group Meeting	A suite of specialist studies will be undertaken. Please refer to the Plan of Study contained in Chapter 7 of the Draft Scoping Report.	Environmental Impacts

17	Offsetting needs to be considered as a last resort and more discussions is needed around mitigation of environmental impacts.	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	The sensitivity of the proposed mine area is recognised and it is important that the mitigation hierarchy is and will continue to be applied throughout the ESIA and mine design process, thus ensuring that the suggested layout will avoid particularly sensitive areas as the first step in mitigating potential impacts. Where impacts on sensitive areas cannot be avoided, these impacts will be mitigated or remedied as far as reasonably possible. Biodiversity offsets will be the last resort and apply specifically to the anticipated residual impacts which cannot be sufficiently reduced through avoidance or other mitigation measures.	Environmental impacts
18	The conservation of present species and biodiversity at the proposed site is critical to sustain the broader Succulent Karoo biome and accompanying goods and services the local people derive from this landscape.	Farayi Madziwa	Conservation South Africa	20-Aug-12	Written comment	A botanical and faunal impact assessment will be undertaken to assess the potential impacts that the Gamsberg mine will have on the local and regional context of the broader succulent karoo biome. Furthermore, a Social Impact Assessment will be undertaken to identify and assess impacts on ecosystem services that are utilised by surrounding communities.	Environmental Impacts
19	Offset the impacts of proposed mining activities on local plant and animal species by adopting and implementing a no-net-loss target for biodiversity in the area, which is currently classified as critically endangered by the South Africa National Botanical Society (SANBI).	Farayi Madziwa	Conservation South Africa	20-Aug-12	Written comment	The botanical impact assessment will provide recommendations and input to a biodiversity offset process.	Environmental Impacts
20	The proposed project is to be conducted in a highly vulnerable and sensitive area. The flora of the Gamsberg, both on the mountain itself and the surrounding quartz beds, is unique. The consequences of the mining and associated operations (e.g. location of spoil and dams) is of great concern as habitat will be lost. The location of any surface operations is therefore a critical element in this project.	Andrew Young	University of Liverpool	21-Aug-12	Written comment	Please refer to Response 17 above.	Environmental Impacts
21	We note there are very few specifics on the mine's localized environmental impact in the Background Information Document, resulting in an under-emphasis of the botanical and ecological sensitivity of the site. The Gamsberg mine will be situated in the threatened ecosystems and plant communities of Bushman Inselbergs vegetation types, which have little protection in formal reserves and any impacts on rare flora will require significant justification. If the mine is given Environmental Authorisation, high levels of mitigation and rehabilitation will be unavoidable.	Christy Bragg	Endangered Wildlife Trust	17-Aug-12	Written comment	Please refer to Response 17 above. Detailed mitigation will be presented in the botanical impact assessment.	Environmental Impacts
22	An independent organisation should be used to monitor the implementation of plans developed by Black Mountain at communities and towns.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12		This suggestion will be forwarded to the Department of Environment and Nature Conservation and Black Mountain Mining for consideration.	ESIA process

23	The impacts statement must be very clear and precise. I&APs must be able to understand the potential impacts and how it will affect them.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	To further assist members of public, public meetings and focus group meetings will be held after the release of the Draft ESIA Report. The purpose of these meetings will be to discuss any issues or concerns that Interested and Affected Parties may have. This opportunity will also serve to ensure that there is a good understanding of the impact assessment findings and suggested mitigation measures.	ESIA process
24	What is the link between the ESIA and the proposed mine's preparation and operational plans?	Lukas van Rooi	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	The ESIA process will scope, assess and suggest mitigation measures for potentially significant impacts associated with the construction, operational and decommissioning phases of the Gamsberg mine. The ESIA process will also propose monitoring and management plans as part of the on-going environmental management at the proposed mine site.	ESIA process
25	When will the relevant environmental impacts and mitigation measures be available to public review?	Ronnie Newman	Conservation South Africa	16-Aug-12	Focus Group Meeting	The Draft ESIA Report is expected to be released at the end of the first quarter or beginning of the second quarter of 2013.	ESIA process
26	How is the Namakwa District Municipality involved in the ESIA?	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	The Namakwa District Municipality has been included onto the Interested and Affected Party Database and will therefore be notified of the progress made on the ESIA process. Furthermore, the District Municipality will be a commenting authority on the ESIA process and will be consulted.	ESIA process
27	Conservation South Africa should be involved with the development of mitigation measures for impacts identified.	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	The Draft ESIA Report, which will contain all mitigation measures, will be released for a 40 day comment period. Furthermore, focus group meetings will be held with social and environmental non-governmental organisations to discuss the findings of the Draft ESIA Report and way forward.	ESIA process
28	If the location of the mining area has already been chosen, how will stakeholder inputs have any relevance to the proposed project?	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	The proposed Gamsberg mine will be located in an area with an existing mining license. Currently, Black Mountain has an existing underground mining operation on the Gamsberg inselberg. Based on the location of the ore body, the location of the mine will have to remain consistent to the ore body, if the resource is to be accessed. Stakeholder inputs, since the commencement of the process, has been used to inform specialist inputs required, identify key issues of concern and raise issue or concerns to help inform the ESIA process. Stakeholder input will remain an important component of the ESIA process, to ensure that local and specialist input and knowledge is used to define the way forward.	ESIA process
29	Is the previous EIA report that was compiled for the proposed Gamsberg project available?	Ronnie Newman	Conservation South Africa	15-Aug-12	Focus Group Meeting	Electronic copies of the previous EIA process will be made available upon request.	ESIA process

30	BMM should find an alternative site other than Gamsberg on which to carry out its mining activities in order to support and perpetuate past endeavours by the Botanical Society of South Africa and Anglo Operations Limited to form a large scale protected area comprised of multi-owned smaller protected areas within a multi-use landscape.	Farayi Madziwa	Conservation South Africa	20-Aug-12	Written comment	The Gamsberg inselberg is said to be the only zinc deposit of its kind in South Africa. the location of the mining operation is defined around the location of the ore body.	ESIA process
31	In terms of the National Heritage Resources Act (NHRA), no 25 of 1999, heritage resources, including archaeological or palaeontological sites over 100 years old, graves older than 60 years, structures older than 60 years are protected. They may not be disturbed without a permit from the relevant heritage resources authority. This means that before such sites are disturbed by development it is incumbent on the developer (or mine) to ensure that a Heritage Impact Assessment is done. This must be done before any prospecting drilling, trenching or mining takes place.	Kathryn Smuts	South African Heritage Resources Agency	31-Jul-12	Written comment	A Phase 1 Heritage and Archaeological Impact Assessment will be undertaken with the findings presented in the Draft ESIA Report. In addition, a desktop Palaeontological Impact Assessment will be undertaken and presented in the Draft ESIA Report. A copy of the Draft ESIA Report, together with all associated specialist reports, will be submitted to SAHRA for review and decision making in terms of the National Heritage Resources Act (No 25 of 1999).	ESIA process
32	The local municipality should provide more support to and become more involved with the public and different sectors of society.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	Thank you for your comment.	Government involvement
33	A concern is raised about the ability of local municipality being able to manage the sudden influx of people into the surrounding town should the proposed project proceed.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	The potential impacts of influx of people into the surrounding towns of Aggeneys, Springbok, Pella and Pofadder will be assessed as part of the social impact assessment. The findings of this assessment will be presented in the Draft ESIA Report.	Government involvement
34	The local municipality should ensure that the needed planning is done to accommodate the influx of people since it will have a direct impact on current infrastructure and available resources e.g. sanitation, security, transport, accommodation.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	The findings of the Social Impact Assessment will present suitable mitigation measures to reduce and manage expected impact of influx. This assessment and suggested mitigation will be released for a 40 day public comment period	Government involvement
35	Local municipalities should put more effective policies and strategies in place focussing on local economic development. Experts should be utilised to assist and strengthen current initiatives in order to provide mines with formal principles and guidelines on local economic development.	Nico Jano	Business Forum	16-Aug-12	Focus Group Meeting	The social and economic impact assessment will attempt to align suggested mitigation measures, including management measures, with local and/ or district municipal policies. Where possible, the Gamsberg project will feed into and influence local economic development activities.	Government involvement
36	What role can the Local Municipality play to strengthening their contribution on local development and enhancing institutional capacity?	Lukas van Rooi	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	Please refer to Response 36 above. Focus Group meetings will be held with the local and district municipality to discuss the potential to support local economic initiatives.	Government involvement
37	How will the quality of groundwater be affected with the proposed new mining operations and associated tailings storage facility?	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	A hydrogeological impact assessment will be undertaken to model and predict potential impacts of groundwater contamination. As part of the planning and design phase, groundwater sensitivities (in the form of fault lines which lead into groundwater bodies) have been avoided during the layout planning process.	Groundwater

38	Housing development should be done in accordance with the Khai-Ma Local Municipality Spatial Development Framework (SDF) plan.	Chris Fortuin	Namakwa District Municipality	12-Aug-12	Written comment	The locations for the proposed housing development include the towns of Aggeneys, Springbok and Pofadder. However, as the housing is related to the Gamsberg mine, the Mining Charter will inform the preferred location. A request will be forwarded to the Department of Mineral Resources to take cognisance of the Khai-Ma Local Municipality's Spatial Development Framework.	Housing
39	New housing options should include impoverished areas and development within existing towns.	Abe Koopman	South African National Biodiversity Institute	16-Aug-12	Focus Group Meeting	Please refer to Responsee 38 above.	Housing
40	Will the proposed housing developments be environmentally friendly?	Abe Koopman	South African National Biodiversity Institute	16-Aug-12	Focus Group Meeting	The specific dimensions, environmental considerations and location will be presented in the Draft ESIA Report.	Housing
41	The proposed project will only benefit certain sectors of society and towns, not all stakeholders. Black Mountain needs to implement the needed measures and consider learnings from their previous developments to ensure that all sectors of society benefit from the project.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	Socio-economic and bio-physical benefits associated with the project will be presented in the Draft ESIA Report. Furthermore, on-going monitoring and management of the proposed mine and its associated benefits will be outlined in the above report.	Other
42	Annual audits on Black Mountain operations being done by the relevant authorities is not perceived to be sufficient and proposes that an independent private organisation is involved with audits.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	Thank you for your comment. This will be forwarded to the Department of Environment and Nature Conservation and Black Mountain Mining for consideration.	Other
43	Developments anticipated after completion of the 2000 EIA for Gamsberg caused some farmers and business to make changes to their operations. Mine developments didn't materialise and these farmers and businesses weren't able to recuperate associated expenses.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	Black Mountain recognises the associated business risks taken by surrounding farmers and businesses in anticipation of the proposed Gamsberg mine. Due to rising costs of power and unstable zinc prices, at the time of completion of the original EIA process, the project was unable to proceed. It must be noted that similar factors could potentially impact the viability of this project, however, this can not be predicted or anticipated. These are the risk inherent in the mining sector.	Other
44	The proposed mine will have a direct negative impact on the value of my land because of the degradation of the surrounding area.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	A macro - economic impact assessment will be undertaken, which will include a detailed assessment on the impacts to surrounding land values. This will be presented in the Draft ESIA Report.	Other
45	Conservation South Africa is considering to conduct their own specialist studies to assess the impacts of the proposed infrastructure and associated locations.	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	Thank you for your comment. ERM and Black Mountain remain available to assist, where possible.	Other
46	Conservation South Africa is currently involved with the development of a Geospatial Mapping Tool in support of the Green Economy Strategy.	Amanda Bourne	Conservation South Africa	16-Aug-12	Focus Group Meeting	Thank you for your comment. ERM would like to obtain this geospatial tool to determine if it can be incorporated into the Gamsberg ESIA process, including specialist studies.	Other
47	Fencing and/or electric fencing should be considered to be put up around the proposed project area to ensure security.	Albertus Roux	Landowner	27-Jul-12	Telephonic consultation	This will be considered.	Project security

48	The increased number of people during operation of the proposed project pose a security threat to the families and livestock of farmers.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	The potential impacts of theft or criminal activities on livestock and surrounding landowners will be assessed as apart of the social impact assessment process. The findings of the assessment, together with suggested mitigation measures will be presented in the Draft ESIA Report.	Project security
49		Albertus Roux	Landowner	27-Jul-12	Telephonic consultation		
50	What will Black Mountain do to ensure that developments and towns remain sustainable after mine closure?	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	The Draft ESIA Report will identify and assess impacts associated with the decommissioning and closure of the mine. The potential impacts associated with livelihood dependencies, rise in criminal activities and substance abuse will be assessed in detail. Suggested measures to alleviate and mitigate against the effect of a decommissioned mining town will also be considered.	Project specific
51	The previously proposed location, as part of the 2000 EIA, of the tailings storage facility was very close to my house. More information on the location and operations of the tailings storage facility is required in order to assess the potential impact.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	Two proposed locations for the tailings facility are being reviewed. Please refer to Figure 3.1 contained in the Scoping Report, which provides a conceptual layout plan for public comment. Stakeholder inputs, technical, financial and environmental (i.e. bio-physical and socio-economic) considerations are being given to determine the final layout plan. The preferred location for all site infrastructure will be presented in the Draft ESIA Report.	Project specific
52	More detailed information about the project and associated components is required in order to provide constructive feedback.	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	Thank you for your comment. A detailed project description is included in Chapter 3 of the Scoping Report.	Project specific
53	It appears there is more information available relating to the Gamsberg project and also from various other sources. Could this information be made available?	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	Electronic copies of previous investigations will be made available, upon request.	Project specific
54	Stakeholder meetings need to be structured in such a manner that stakeholders would have the opportunity to contribute effectively.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	Thank you for your comment. This will be considered in preparation for future stakeholder engagement processes.	Public Participation
55	Stakeholders should be included throughout the ESIA process and provided with feedback on concerns and suggestions raised. Copies of the concerns and suggestions raised must be made available to all stakeholders.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	All registered Interested and Affected Parties will be kept updated as the ESIA process progresses, including made aware of when reports have been released for public comment and timing of public meetings. A copy of the full Comments and Response Report has been made available to anyone who has submitted comment.	Public Participation
56	I&APs must receive the mitigation measures associated with the various impacts in a simple and understandable language.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	The mitigation measures will be included into the Draft ESIA Report and released for a 40 day public comment period. After the release of the Draft ESIA Report, public and focus group meetings will be held to discuss the findings of the report and allow all attendees the opportunity to discuss any uncertainties.	Public Participation

57	Will the public participation process include community members? If so, it is important to ensure that the relevant dates are made available to stakeholders well in advance.	Lukas van Rooi	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	The public meetings held will invite all registered Interested and Affected Parties to attend. Prior to the distribution of the Draft ESIA Report, all stakeholders will be made aware of the upcoming public meetings.	Public Participation
58	The approach from BMM to work closely with stakeholders on the proposed project is appreciated.	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	Thank you for your comment.	Public Participation
59	Farm workers tends to be overlooked by the municipality when socio-economic developments are done e.g. allocation of houses. This should be considered with the potential implementation of the proposed mine.	Abrie van Niekerk	Landowner	15-Aug-12	Focus Group Meeting	This request will be forwarded to Black Mountain for consideration.	Socio-economic development
60	An alternative transport option should be considered where ore is taken to the Port Nolloth Port for export.	Chris Fortuin	Namakwa District Municipality	12-Aug-12	Written comment	The potential to construct a Port at Port Nolloth is being investigated at a feasibility level. However, as there is no certainty on the viability of this option, it is being assumed that all concentrate produced will be transported to the Port of Saldanha. Should the construction of a new Port at Port Nolloth prove to be viable, a separate EIA process will be undertaken for this project.	Transport
61	The existing gravel road constructed by Black Mountain is well maintained by them and adds value to farmers in the area.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	Thank you for your comment. Black Mountain will continue with their current efforts to maintain the Gravel Road.	Transport
62	The option of the transportation of ore on the existing tar road (N14) will not be feasible as the roads are not built to carry such traffic.	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	A detailed Traffic Impact Assessment will be undertaken to review the viability to utilise the N14 and N7 to transport zinc concentrate to the Port of Saldanha.	Transport
63	Is the construction of a new railway from the proposed mine to link up with the existing railway at 10 an option to be considered?	Girrie van den Heever	Pofadder Landbou Vereniging	15-Aug-12	Focus Group Meeting	This ESIA process will not consider the construction of a new railway line to the Loop 10 siding. Should this be explored at a future date, a separate EIA process will be undertaken for that infrastructure.	Transport
64	The construction of a new railway line could benefit the proposed mine, especially if a railway line goes directly to Port Nolloth.	Lukas van Rooi	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	Please refer to Responses 60 and 63 above.	Transport
65	The current road infrastructure isn't sufficient to carry additional trucks proposed to transport ore to Saldanha Bay Port.	Stefanus April	Khai-Ma Local Municipality	16-Aug-12	Focus Group Meeting	Please refer to Response 62 above.	Transport
66	The N14 and N7 national roads should not be considered as options for transportation, since these roads would not be able to sustain the additional trucks.	Abe Koopman	South African National Biodiversity Institute	16-Aug-12	Focus Group Meeting	Please refer to Response 62 above.	Transport

67	Where will the tailings storage facility be located?	Andy Pienaar	NAGO	16-Aug-12	Focus Group Meeting	Two potential options are being explored for the placement of the proposed tailings facility. Please refer to Figure 3.1 in the Scoping Report, which outlines the two potential locations. Stakeholder input, technical, financial and environmental considerations will inform the final location of the tailings facility.	Waste management
68	Where is BMM's existing tailings storage facility located?	Abe Koopman	South African National Biodiversity Institute	16-Aug-12	Focus Group Meeting	Black Mountains existing tailings facility is located adjacent to the existing Deeps Mine, located approximately 15km south west of the Gamsberg inselberg.	Waste management
69	New water pipes from the Orange River to the mine running above ground holds potential risk of being damaged.	Ronnie Newman	Conservation South Africa	16-Aug-12	Focus Group Meeting	The upgrading of the water infrastructure is being undertaken as a separate Basic Assessment process, as the applicant is the Pella Drift Water Board. All registered Interested and Affected Parties for the Gamsberg project will be automatically registered for the Pella Drift Water Board Basic Assessment process. The Draft Basic Assessment Report is expected to be released for a 40 day comment period in the January 2013.	Water
70	A copy of the EIA should be handed to the general/chief of police in the province. The police force should also be informed.	Khai-Ma Police	Khai-Ma Police	11-Sep-12	Focus Group Meeting	Initial meetings was held with the South African Police Services. A copy of the Draft Scoping Report was submitted to the SAPS for their review and comment.	Public Participation
71	A public meeting should be held involving all the community members and organs of state.	Khai-Ma Police	Khai-Ma Police	11-Sep-12	Focus Group Meeting	Public meetings are proposed upon release of the Draft ESIA Report. Meetings will be held in the towns of Aggeneys, Pofadder and Pella.	Public Participation
72	There are plants all over the Northern Cape, furthermore offsetting is a possibility. The project should not be halted for the sake of plant species.	Mrs Van Rooyen	Boesmanland High School	11-Sep-12	Focus Group Meeting	Thank you for your comment.	Other
73	Aggeneys Women would appreciate being informed throughout the project phases.	Aggeneys Women	Aggeneys Women	13-Sep-12	Focus Group Meeting	The Aggeneys womens group are registered as an Interested and Affected Party and will therefore be kept updated on the progress made on the ESIA process.	Public Participation

74	The project must be involved in improving the lives of the youth, particularly matriculants	Hope for Life	Hope for Life NGO	11-Sep-12	Focus Group Meeting	The project will result in the generation of construction and operational phase employment opportunities. Furthermore, on-the-job training will be provided as part of the skills upliftment efforts in the surrounding communities. Preference will be given to the surrounding towns of Aggeneys, Pella and Pofadder. A Minimum education standard will be suggested for employment opportunities at the Gamsberg mine for specific job types.	Project Benefits
75	Influx of people can be seen as growth and lead to development of Khai-Ma region.	Khai-Ma Municipal Officers	Khai-Ma Municipality	10-Sep-12	Focus Group Meeting	The potential positive and negative impacts of influx of people into the Khai Ma region will be assessed as part of the Social Impact Assessment and presented in the Draft ESIA Report.	Population Influx