



# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

*Environmental Stewardship*

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## Public participation:

- In the whole of Volume 3 (Public participation and supporting documentation) no indication is given of meetings with the communities, or any evidence of comments from the community members being taken into account. The physical EIA was only available in the Koingnaas mine office, and only in English as far as I know. Many of the members of the communities of Hondeklip Bay and Kommagas does not have access to transport to Koingnaas to go look at the EIA, and also does not have access to computers and internet to download and view the large EIA documents, and also may not understand English sufficiently to make sense of the EIA. This is a major shortcoming of this EIA, as this means that the members of these communities were not made aware of the proposed activities and the impacts it may have on them. Public participation in this regard was not sufficient.
- There is also no indication of any meetings or consultation with SanParks, who are a major stakeholder, as the proposed mining activities will take place adjacent to, and will impact on the Namaqua National Park.

During both the public participation processes for the Scoping report phase as well as the Environmental Impact Assessment report (EIAR) and Environmental Management Programme report (EMPr) phases, the physical reports were left at the following locations: Koingnaas Mine offices, Springbok Library and West Coast Resources head office.

It was our reasonable conclusion that the community would successfully be reached, since there was a submission (During the Scoping phase) that was received by Myezo, from Mr. Markus on 18 April 2016, via a fax to e-mail service. In this submission, he presented the concerns that were submitted as those of the Hondeklip Bay community. The submitted concerns were captured and addressed in the EIA report. It was as such understood that the community was indeed reached and had presented their unified submission by means of this submission, rather than as individuals. It was then against this same understanding that the EIAR was sent to the registered parties and as such to Mr. Markus. We feel it is more than reasonable to believe that the Hondeklip Bay community would then be able, in the same manner than what they were during the Scoping phase, to be reached and have them voice and present their unified opinions, on the EIAR and EMPr, to Myezo in a similar fashion that of the Scoping phase comments submission made by Mr. Markus. We were confident that this communication channel proved itself to be the most effective manner in which the voices of the Hondeklip Bay could be heard, since we received it as a single, unified expression of their concerns.

Given the successful public participation process that was followed for the Scoping report, it can be reasonably concluded that, if the same processes were followed for the public participation process for the EIAR and EMPr, with regards to the physical placement and online availability of the reports for public review, then it would, in its eventuality, also be successful.

Response to Mr. Markus' comments can be found in Volume 3, Appendix 4.4.2 Response to stakeholder comments.

As a result of your earlier reminder to include SANPARKS as an important stakeholder, which was received with gratitude, we have included them in the public participation process. Attachment 1 of this document gives proof of the notification letter of the EIAR and EMPr that were made available to them for review. Subsequent to this, SANPARKS did submit their comments and they were addressed in the final report.





## Sedimentation of intertidal and subtidal reefs due to redistribution of sediments

- Pg. 505 Part A, Volume 2: Impacts and risks identified and management measures
- "Monitoring at various mining sites in southern Namibia has shown that such mobilised and re-deposited sediments can have severe impacts on intertidal and shallow sub tidal rocky shore habitats bordering the mined beaches and at some distance away, with both temporary and permanent loss of rocky intertidal habitats being reported as a result of shoreline accretion"
- There are **no** mitigation measures for above mentioned impacts, yet the significance rating is medium and not high. The localized effect might be deemed of lesser impact relating to the nature of mining permitting exclusive use, it is however the broader and cumulative and after effects that are of concern.
- We want to reiterate the comment from DEA: "Give consideration to co-ordination of monitoring programmes with DEA and sharing of research information;" .Sharing of monitoring information will lead to a better understanding of anticipated versus actual impacts.

Despite the medium significance, no mitigation measures other than the no-go option are feasible. This is stated in the report. The impact has been rated as medium (obtained in accordance with the impact assessment methodology) rather than high because of the naturally dynamic sediment movements along the coast. Sediments accrete naturally during periods of calm and erode again when seas get rough. The intertidal and shallow subtidal biota of reefs are adapted to these natural fluctuations in sediments.

### Additional comments:

In the DAFF meeting on 3 June 2016 it was also asked that the impacts of suspended sediment plumes and elevated turbidity as a result of mining operations need to be assessed (on page 6 of the minutes for this meeting given in Volume 3 of the EIA). Has this been done? They say that a specialist study has been commissioned as part of the EIA to investigate the issues raised.

Effects of suspended sediment plumes are covered under Volume 4, Part 2, Section 7.1 Marine Report, Sub-section 6.2.4.

Background Information should be updated, examples include: There is currently no active oyster farming near the Orange River mouth as mentioned in the report. BI. 388-Part A: Volume 1 oyster farming at the ORM are still mentioned in the report.



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This  
has  
now

been updated and Oyster Farming at the ORM is not mentioned any longer under Baseline Environment, Section C, Sub-section 1.3.4

The monitoring protocol is addressed in the Marine monitoring recommendations report under monitoring protocol in Volume 4, Section 7.1.2.

Yours faithfully

Babalwa Fatyi *Pr.Sci.Nat*  
Managing Director

## Attachment 1

**Proof of notification letter about the review period of the EIAR and EMPr as sent to SANPARKS**





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**From:** Admin  
**Sent:** 28 September 2016 08:05 AM  
**To:** 'petrus.Schreuder@sanparks.org' <petrus.Schreuder@sanparks.org>  
**Subject:** West Coast Resources Environmental Impact Assessment report notification

Dear Interested and affected party (IAP)

**WEST COAST RESOURCES-KOINGNAAS AND SAMSONS BAK COMPLEXES-ENVIRONMENTAL IMPACT ASSESSMENT**

**NOTIFICATION TO INTERESTED AND AFFECTED PARTIES ABOUT THE REVIEW PERIOD FOR AN ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT, WHICH HAS BEEN COMPILED AS PART OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION, IN SUPPORT OF A MINING RIGHT HELD BY WEST COAST RESOURCES (PTY) LTD, OVER THE KOINGNAAS AND SAMSONS BAK COMPLEXES**

**Document Name:** WKSCE-PI-EIA report authorities notific Letter

**Date:** 27 September 2016

**Myezo RefNo:** WKSCE/2015/02/NL

**DMR RefNo:** NC0043-MR/102 and NC0044-MR/102

**From:** Admin  
**Sent:** 28 September 2016 07:59 AM  
**To:** 'elanza.vanlente@sanparks.org' <elanza.vanlente@sanparks.org>  
**Subject:** West Coast Resources Environmental Impact Assessment report notification

Dear Interested and affected party (IAP)

**WEST COAST RESOURCES-KOINGNAAS AND SAMSONS BAK COMPLEXES-ENVIRONMENTAL IMPACT ASSESSMENT**

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**Document Name:** WKSCE-PI-EIA report authorities notific Letter

**Date:** 27 September 2016

**Myezo RefNo:** WKSCE/2015/02/NL

**DMR RefNo:** NC0043-MR/102 and NC0044-MR/102

**From:** Piet Schreuder [mailto:Petrus.Schreuder@sanparks.org]  
**Sent:** 30 September 2016 02:38 PM  
**To:** Admin <admin@myezo.co.za>  
**Subject:** Read: West Coast Resources Environmental Impact Assessment report notification

Your message

To: Piet Schreuder  
Subject: West Coast Resources Environmental Impact Assessment report notification  
Sent: Wednesday, September 28, 2016 8:05:09 AM (UTC+02:00) Harare, Pretoria

was read on Friday, September 30, 2016 2:36:46 PM (UTC+02:00) Harare, Pretoria.



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Pretoria, South Africa

## Attachment 2

### Map showing Koingnaas Critical Biodiversity areas





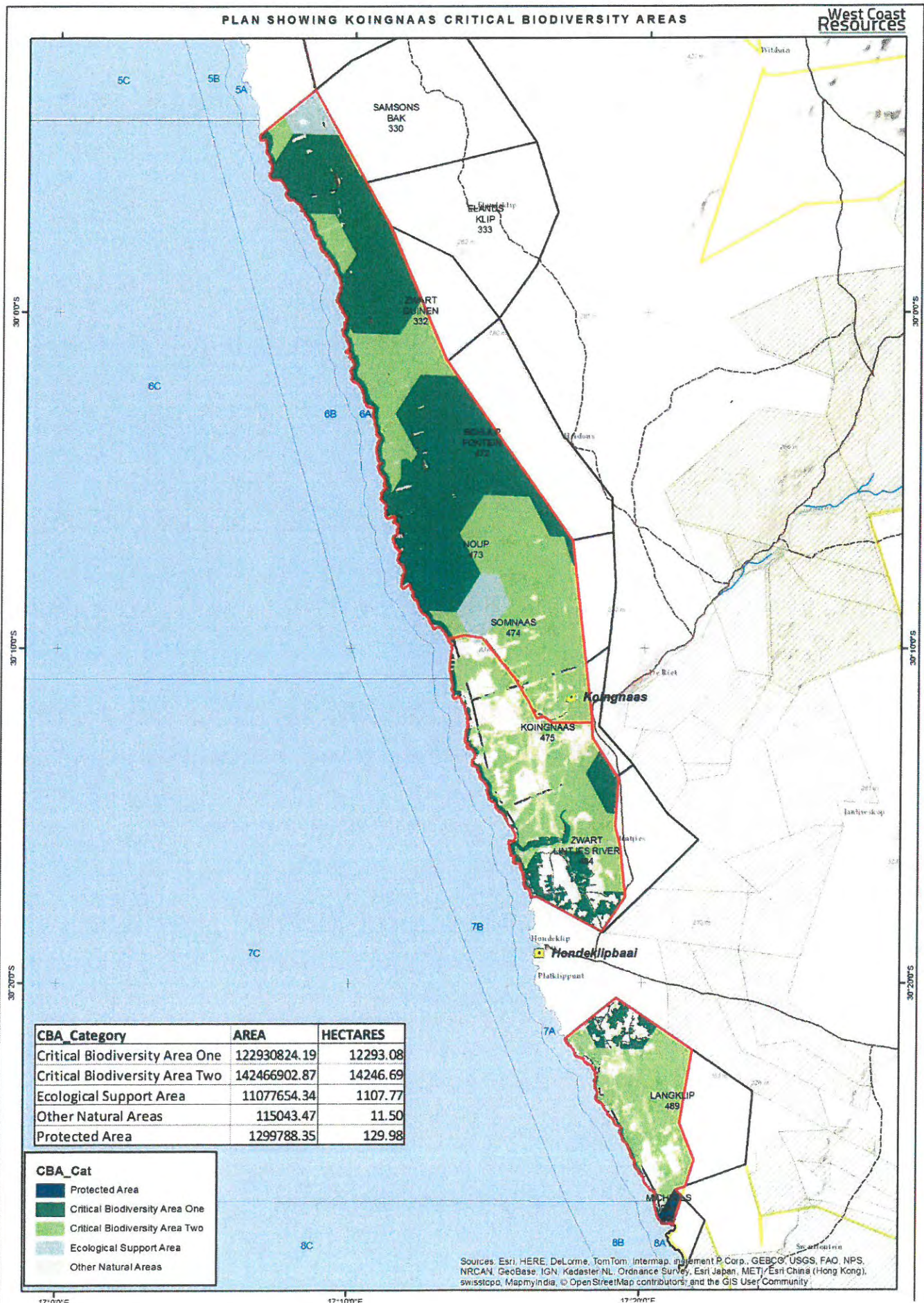
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Pretoria, South Africa

## Postnet Faerie Glen

---

**From:** Babalwa Fatyi  
**Sent:** 18 November 2016 11:53 AM  
**To:** Sicelo Jebe <[sicelo@myezo.co.za](mailto:sicelo@myezo.co.za)>; Postnet Faerie Glen <[postnet@sainet.co.za](mailto:postnet@sainet.co.za)>; Tiisetso Koko <[Tiisetso@myezo.co.za](mailto:Tiisetso@myezo.co.za)>  
**Subject:** FW: WCR comments

**From:** Babalwa Fatyi  
**Sent:** Monday, October 31, 2016 10:10 AM  
**To:** 'Wilna Oppel' <[woppel.dtec@gmail.com](mailto:woppel.dtec@gmail.com)>; permits <[permits@vodamail.co.za](mailto:permits@vodamail.co.za)>  
**Cc:** Tiisetso Koko <[Tiisetso@myezo.co.za](mailto:Tiisetso@myezo.co.za)>  
**Subject:** RE: WCR comments

Dear Wilna

Thank you for your comments on the environmental impact assessment report for West Coast Resources.

This serves to acknowledge receipt of the comments. We are reviewing them for incorporation into the report, and we will notify your department of how they have been addressed.

Wishing you a productive week ahead.

Kind Regards

**Babalwa Fatyi Pr.Sci.Nat**  
Director  
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E [babalwa@myezo.co.za](mailto:babalwa@myezo.co.za) | [www.myezo.co.za](http://www.myezo.co.za) |



**From:** Wilna Oppel [<mailto:woppel.dtec@gmail.com>]  
**Sent:** Friday, October 28, 2016 2:19 PM  
**To:** Babalwa Fatyi <[Babalwa@myezo.co.za](mailto:Babalwa@myezo.co.za)>; permits <[permits@vodamail.co.za](mailto:permits@vodamail.co.za)>  
**Subject:** WCR comments

Hi  
Please find attachment



Regards

--  
Ms.W.M.Oppel

Control Biodiversity Officer Grade B- Coastal Management  
Department of Environment and Nature Conservation

C/O Voortrekker and Magasyn Street  
Atlas COP- CO Building  
Springbok ,8240 ,  
South Africa

TEL: (027) 718 8800

FAX:(027) 718 8814

CELL: 082 4403209

[EMAIL:woppel.dtec@gmail.com](mailto:woppel.dtec@gmail.com)

**Response to South African National Parks**





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22November2016

Park Planning and Conservation Services  
PO BOX 76693  
N.M.M.U  
6013  
Port Elizabeth

**Tel:**041-508 5411

**Fax:**041-508 5415

**Attention:** Dr.Ane Oosthuizen

## WEST COAST RESOURCES-KOINGNAAS AND SAMSONS BAK COMPLEXES-ENVIRONMENTAL IMPACT ASSESSMENT

**LETTER ADDRESSING COMMENTS FROM SOUTH AFRICAN NATIONAL PARKS PERTAINING TO AN  
ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT,  
WHICH HAS BEEN COMPILED AS PART OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION, IN  
SUPPORT OF A MINING RIGHT HELD BY WEST COAST RESOURCES (PTY) LTD, OVER THE KOINGNAAS AND  
SAMSONS BAK COMPLEXES**

**Document Name: WKSCE-PI-EIA PI Letter addressing SANParks comments**

**Date: 18 November 2016**

**Myezo Ref No: WKSCE/2015/02/PI**

**DMR Ref No: NC0043-MR/102 and NC0044-MR/102**

Dear Dr. Oosthuizen

This communication serve as a response to the comments received from South African National Parks (SANParks) and I trust you will receive it in good order. Please take note that the comments as per the document from SANParks are copied into this document as an image of the original document and the responses will follow directly underneath it. Please note, the responses are addressed in the same sequence than that of the comments, as received from SANParks.



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SANParks as the Management Authority of Namaqua National Park have a number of concerns regarding this application:

- No consultation of SANParks during the initial stakeholder process (2015), even though SANParks is a state entity, major land owner, and direct neighbour to the proposed site.
- An indication of West Coast mineral rights in the southern Lang vlakke section, which might fall within the boundary of Namaqua National Park (map resolution to small).
- Extensive environmental damage to several the coastal and marine environments, within the buffer zone of the Namaqua National Park.
- Concerns about the increased saline conditions of the groundwater through seepage from slime dams.
- Mining impact on the ZwartLintjes estuary.
- Loss of biodiversity in the intertidal, shallow subtidal habitat of a marine embayment.
- Air and water pollution associated with mining activities and the impact thereof on the Namaqua National Park and proposed Namaqua Marine Protected Area.

## Response

- With regards to consultation, this is acknowledged and the relinquishment sale agreement discussions which are scheduled for the 25<sup>th</sup> of November 2016, will ensure open channel of communication and as such, the outcomes of such engagement will be incorporated into the Environmental Impact Assessment report (EIAr). The significance of such an agreement is honoured also by requesting an extension on the submission of the EIAr from the Department of Mineral Resources (DMR). The surface infrastructure layout plan in Appendix 4, indicates the areas that within the existing mining and prospecting rights are due for relinquishment to SANParks.
- With regards to Bullet 2, this has now been rectified.
- With regards to bullet three, there is a Marine Specialist Assessment study and the Monitoring Protocol done by the Marine specialist in Volume 4 of 4, Section 7.2 and there are mitigation measures in the Environmental Management Plan (EMP). There are mitigation measures and management actions that will be implemented prior to, operational stage, and in the decommissioning stage. Some of these include preventing degradation of the sensitive high-shore beach areas, all activities will be managed according to a strictly enforced EMP. The operational footprint of the mining site will be minimised as far as practicable. There will be no disposal of tailings above the high-water mark, blasting and large-scale removal of rocks from subtidal gullies into the intertidal will be prohibited, and there will be flattening of all remaining tailings heaps on completion of operations. This is also been addressed in Volume 2 of 4, Part B, Table (d) (ix) 1-1, under topic Surfzone related Impacts, activity number 1. With regards to temporary accretion of the beach in the immediate vicinity of the mining target using overburden material available on the beach or from adjacent on land mining sites, there is a management measure that will ensure that the possible environmental impacts will be well managed to prevent further damage. One of the mitigation measures addresses the disturbance of beach habitat adjacent to the mining blocks. The aim is to minimise this disturbance through stringent environmental management and good house-keeping practices. Rehabilitation will be done even in the decommissioning stage to ensure that the coastal and marine environment in all the mining areas, including Namaqua National Park, is left in good state.
- Regarding the concern on increased saline conditions of ground water through seepage as indicated in bullet four, this is addressed in the EMP in Volume 2 of 4, Part B, Table (d) (ix) 1-1. On activity 6, regarding discharge of seawater used to screen marine gravels, there will be reduction of negative effects of salinisation of soils from seawater by locating the outlets from the screens as close to the top of the intertidal zone as possible contractors and all other personnel will be educated about the importance of benthic fauna in the marine ecosystem, and encourage them to minimise direct and indirect removal or damage through mining activity. This is also addressed in Volume 4 of 4, Subsection 6, under Recommendations in Section 11 of the Ground Water Study Report.





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- With regards to Bullet 5 on the impacts to be caused by mining on the Swartlintjies estuary, there is a specialist study done for the impacts of mining activities on the estuary. Unnecessary disturbance of communities and destruction of habitats, heavy vehicle traffic in the high- and mid-shore will be limited to the minimum required, and will be restricted to clearly demarcated access routes and operational areas only. The operational footprint of the mining site will be minimized, as far as practicable. This is on the EIAr, Volume 4 of 4, Section 7.1.2, Subsection 5.1 of the Marine Monitoring Report, under heading Environmental Management. It is recommended in the Marine report that there is a need for the development of beach management plans for management of mining impacts. Strict house-keeping will be required at beach mining sites (e.g. no refueling on the beach, and all equipment to be removed on cessation of operations). An Environmental Control Officer will be appointed to ensure compliance with the EMP.
- With regards to loss of biodiversity in the intertidal, shallow subtidal habitat of the marine embayment, this is addressed the Marine Specialist Assessment Report in Volume 4 of 4, Section 7.1.2, Subsection 7.2 that, during operational stage, blasting and large-scale removal of rocks from subtidal gullies into the intertidal must be avoided. Re-mining of sites in the medium to long term will be avoided. There will be no disposal of tailings above the high-water mark. Blasting and large scale removal of rocks from subtidal gullies into the intertidal will be prohibited. On the cessation of operations, all mining equipment, artificial constructions or beach modifications created during mining must be removed from above and within the intertidal zone.
- The Dust Plume Report in Volume 4 of 4, Section 4, Subsection 8 of the Dust Plume Report addresses the air pollution associated with mining activities and the impact on the Namaqua National Park and the proposed Namaqua Marine Protected Area. Monitoring of fall-out dust is seen to be best achieved by using the DustWatch™ equipment. Dust source, wind-path and affected receiving environment will be assessed during operational stage. Use of revegetation and through the use of temporary sand-trap cut-off netting systems are advocated for dust plume control. There will be monitoring of the dust plume which is one of the identified possible impacts in the pollution of air around the study area. With regards to water pollution concern. The focus is on ensuring that all operations and facilities manage effluents, wastes, emissions and hazardous substances to prevent water pollution. There is a planned establishment of infrastructure which will include diversion of berms and trenches, slimes dams, and Return Water to prevent water pollution. Groundwater quality and level monitoring will be conducted. Internal quarterly reporting to be undertaken and an annual report to be submitted. This information is also found in Part B, Volume 2 of 4, activity 4 of the EMP, Table (d) (ix) 1-1.

## Postnet Faerie Glen

---

**Subject:** FW: West Coast Resources meeting and shapefiles

**From:** Babalwa Fatyi  
**Sent:** 17 November 2016 01:51 PM  
**To:** Oosthuizen, Anè (Dr) (Summerstrand Campus South) <[Ane.Oosthuizen@nmmu.ac.za](mailto:Ane.Oosthuizen@nmmu.ac.za)>; Tiisetso Koko <[Tiisetso@myezo.co.za](mailto:Tiisetso@myezo.co.za)>  
**Subject:** Re: West Coast Resources meeting and shapefiles

Dear Dr Anè

We will provide you with the shapefiles.

I just want to also request that I get back to you after 4 pm today, regarding having a meeting at 12 midday on Friday next week. We need to confirm availability with a key role player and will discuss with him only this afternoon as he is currently tied - up.

Warm regards

Babalwa

Sent from my Samsung Galaxy smartphone.

----- Original message -----

**From:** "Oosthuizen, Anè (Dr) (Summerstrand Campus South)" <[Ane.Oosthuizen@nmmu.ac.za](mailto:Ane.Oosthuizen@nmmu.ac.za)>  
**Date:** 2016/11/17 13:06 (GMT+02:00)  
**To:** Tiisetso Koko <[Tiisetso@myezo.co.za](mailto:Tiisetso@myezo.co.za)>, Babalwa Fatyi <[Babalwa@myezo.co.za](mailto:Babalwa@myezo.co.za)>  
**Subject:** RE: West Coast Resources

Dear Babalwa and Tiisetso

Can you provide me with a shapefile indicating the Mining rights area as indicated in the below figures?

Fig (g) (iv) (a) 1-2

Fig (g) (iv) (d) 1-1

Fig (g) (iv) (d) 1-3a,

Fig (g) (iv) (d) 1-3b

Many thanks

Kind regards



\*\*\*\*\*

Dr Ané Oosthuizen

National Marine Co-ordinator

Park Planning & Development

South African National Parks

*Research Associate: NMMU Zoology*

*WIO-COMPASS MPA PRO*

Email: [Ane.Oosthuizen@nmmu.ac.za](mailto:Ane.Oosthuizen@nmmu.ac.za)

**New Cell: 071 4000371**

Box 76693, N.M.M.U., 6031, Port Elizabeth

Website: [www.sanparks.org](http://www.sanparks.org)

---

**From:** Tiisetso Koko [<mailto:Tiisetso@myezo.co.za>]  
**Sent:** 31 October 2016 04:35 PM  
**To:** Oosthuizen, Anè (Dr) (Summerstrand Campus South)  
**Cc:** Babalwa Fatyi  
**Subject:** West Coast Resources

Dear Ane

Subsequent to your communication with Babalwa as reflected on the email below, kindly note I will be sending a Map showing the farms and the mining area via [www.wetransfer.com](http://www.wetransfer.com). This is because of the size of the Map in terms of space, as it might take too long for you to receive it via Outlook.

You will get a notification for the receipt on your email, in a few minutes after reading this email.

Kind Regards

**Tiisetso Koko**

Environmental Administrator

**M +27 84 375 7061 | T +27 12 998 7642 | F + 27 012 998 7641**



----- Original message -----

From: "Oosthuizen, Anè (Dr) (Summerstrand Campus South)" <[Ane.Oosthuizen@nmmu.ac.za](mailto:Ane.Oosthuizen@nmmu.ac.za)>

Date: 2016/10/28 12:42 (GMT+02:00)

To: Babalwa Fatyi <[Babalwa@myezo.co.za](mailto:Babalwa@myezo.co.za)>

Cc: "Willem Louw ([Willem.Louw@sanparks.org](mailto:Willem.Louw@sanparks.org))" <[Willem.Louw@sanparks.org](mailto:Willem.Louw@sanparks.org)>

Subject: West Coast Resources

Dear Ms Fatyi

Herewith initial comment from South African National Parks on the West Coast Resources EIA and EMP.

Regards

\*\*\*\*\*

Dr Ané Oosthuizen

National Marine Co-ordinator

Park Planning & Development

South African National Parks

*Research Associate: NMMU Zoology*

*WIO-COMPASS MPA PRO*

Email: [Ane.Oosthuizen@nmmu.ac.za](mailto:Ane.Oosthuizen@nmmu.ac.za)

**New Cell: 071 4000371**

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Website: [www.sanparks.org](http://www.sanparks.org)

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## Postnet Faerie Glen

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**From:** Babalwa Fatyi  
**Sent:** 31 October 2016 10:39 AM  
**To:** Lourens <lourens@myezo.co.za>  
**Subject:** FW: West Coast Resources

**From:** Babalwa Fatyi  
**Sent:** Monday, October 31, 2016 10:35 AM  
**To:** 'Oosthuizen, Anè (Dr) (Summerstrand Campus South)' <[Ane.Oosthuizen@nmmu.ac.za](mailto:Ane.Oosthuizen@nmmu.ac.za)>  
**Cc:** Willem Louw ([Willem.Louw@sanparks.org](mailto:Willem.Louw@sanparks.org)) <[Willem.Louw@sanparks.org](mailto:Willem.Louw@sanparks.org)>; Tiisetso Koko <[Tiisetso@myezo.co.za](mailto:Tiisetso@myezo.co.za)>  
**Subject:** RE: West Coast Resources

Dear Dr Oosthuizen

Thank you for your expressed concerns and comments regarding the environmental impact assessment process for West Coast Resources.

We are in the process of reviewing your comments and this communicate serves to acknowledge their receipt. A map indicating West Coast mineral rights in the southern Lang vlakte section will be sent to you soon.

Kind Regards

**Babalwa Fatyi Pr.Sci.Nat**  
Director  
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**From:** Oosthuizen, Anè (Dr) (Summerstrand Campus South) [<mailto:Ane.Oosthuizen@nmmu.ac.za>]  
**Sent:** Friday, October 28, 2016 12:43 PM  
**To:** Babalwa Fatyi <[Babalwa@myezo.co.za](mailto:Babalwa@myezo.co.za)>  
**Cc:** Willem Louw ([Willem.Louw@sanparks.org](mailto:Willem.Louw@sanparks.org)) <[Willem.Louw@sanparks.org](mailto:Willem.Louw@sanparks.org)>  
**Subject:** West Coast Resources

Dear Ms Fatyi

Herewith initial comment from South African National Parks on the West Coast Resources EIA and EMP.

Regards



\*\*\*\*\*

Dr Ané Oosthuizen  
National Marine Co-ordinator  
Park Planning & Development  
South African National Parks

*Research Associate: NMMU Zoology*  
*WIO-COMPASS MPA PRO*  
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# West Coast Resources



## MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

*Environmental Stewardship*

WEST COAST RESOURCES-KOINGNAAS AND SAMSONS BAK COMPLEXES-ENVIRONMENTAL  
IMPACT ASSESSMENT

ENVIRONMENTAL IMPACT ASSESSMENT REPORT SUBMITTED FOR ENVIRONMENTAL AUTHORISATIONS  
IN RESPECT OF AN AMENDMENT OF A MINING RIGHT HELD BY WEST COAST RESOURCES (PTY) LTD,  
OVER THE KOINGNAAS AND SAMSONS BAK COMPLEXES

Document Name: *WKSCE-Reports-Environmental Impact Assessment Appendices h-5 to Appendix h-5.3.7*  
Document Status: *Rev.1*

Volume 3 (Public participation and supporting documentation: Appendices h-5 to Appendix h-5.3.7)  
Date: 21 November 2016

**Volume 3 of 4  
PART C**

Myezo Ref: *WKSCE/2015/02/EIA*

DMR Ref: *NC0043-MR/102 and NC0044-MR/102*



**mineral resources**


Department:  
Mineral Resources  
REPUBLIC OF SOUTH AFRICA





# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

*Environmental Stewardship*

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## **WEST COAST RESOURCES-KOINGNAAS AND SAMSONS BAK COMPLEXES-ENVIRONMENTAL IMPACT ASSESSMENT**

### **INDEX FOR SUPPORTING DOCUMENTATION AND RESULTS OF PUBLIC INVOLVEMENT FOR THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT SUBMITTED FOR ENVIRONMENTAL AUTHORISATION, IN SUPPORT OF AN AMENDMENT TO MINING RIGHT, HELD BY WEST COAST RESOURCES (PTY) LTD, OVER THE KOINGNAAS AND SAMSONS BAK COMPLEXS**

**Document Name: WKSCE-PI-EIA -PI-Index for supporting documentation and results of public involvement for  
the Environmental Impact Assessment report (EIAR)**

**Date: 21 November 2016**

**Myezo Ref No: WKSCE/2015/02/EIA**

**DMR Ref No: NC0043-MR/102 and NC0044-MR/102**

#### **VOLUME 3 OF 4: PART A (Included in a different document)**

- Appendix 1: Qualifications, Registrations and Certificates
- Appendix 2: Curriculum Vitae and Company profile
- Appendix 3: Locality Map
- Appendix 4: Surface infrastructure layout plan (Drawing 001)
  - Appendix 4.1: Layout of mobile wet screening plant
  - Appendix 4.2: Existing and proposed slimes dam location sites
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  - Appendix 4.3: Existing and planned infrastructure network
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- Appendix 5: Potential mine blocks for the areas outlined in the figures below
  - Figure (d) (ii) - 10: Scheduled mine block depletion for the Koingnaas Complex

Figure (d) (ii) - 11: Scheduled mine block depletion for the Koingnaas Complex – Michelle’s Bay - Langklip area

Figure (d) (ii) - 12: Potential mine blocks (coffer dam location) for the NP (Noup) - Beach Zone on Noup

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Figure (d) (ii) - 14: Potential mine blocks (coffer dam locations) for the KN (Koingnaas) - Beach Zone in the northern part of Koingnaas

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Figure (d) (ii) - 16: Potential mine blocks (coffer dam location) for the LKC (Langklip) - Beach in the central part of Langklip

Figure (d) (ii) - 17: Potential mine blocks (coffer dam location) for the LK (Langklip) - Beach Zone the southern part of Langklip

Appendix e-1: Applicable legislation

Appendix h-1–h-7: Public involvement appendices (Adverts, site notices, IAPR register, communication to and from stakeholders, minutes, information sharing)

- Appendix h-1: Advert
  - Appendix h-1.1: Proof of publication
  - Appendix h-1.2: Print out of how it looks like
- Appendix h-2: Site Notice
  - Appendix h-2.1: Photos of proof
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    - ✓ Appendix h-4.1.1.1: DENC
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      - ❖ Scoping and EIA report submission and other related matters



**VOLUME 3 OF 4: PART B (Included in a different document)**

- ✓ Appendix h-4.1.1.2: DAFF
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  - ❖ Scoping and EIA report submission and other related matters
- ✓ Appendix h-4.1.1.3: DMR
  - ❖ Meeting requests and confirmation in the form of email and/or a letter
  - ❖ Scoping and EIA report submission and other related matters
- ✓ Appendix h-4.1.1.4: DEA
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- Appendix h-4.4: Communication from Stakeholders (interested and affected parties)
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- ❖ Comments from Mr. Gert Le Roux
- ❖ Comments from DAFF
- ❖ Comments from Markus Dawid (Hondelklipbay Community)
- ❖ Comments from Mining and Environmental Justice Community Network of South Africa (MEJCON-SA)
- ✓ Appendix h-4.4-2: Comments from stakeholders and acknowledgement of receipt of comments regarding EIA report
  - ❖ Comments from Mr Gert Le Roux
  - ❖ Comments from Markus Dawid (Hondelklipbay Community)
  - ❖ Comments from DENC
  - ❖ Comments from South African National Parks
- ✓ Response to Stakeholder comments
  - ❖ Response to Mr Gert Le Roux
  - ❖ Response to Markus Dawid (Hondelklipbay Community)
  - ❖ Response to DENC
  - ❖ Response to South African National Parks

#### **VOLUME 3 OF 4: PART C**

- Appendix h-5: Meetings
  - Appendix h-5.1: Agendas (included as part of minutes)
  - Appendix h-5.2: Presentation (included as part of minutes)
  - Appendix h-5.3: Minutes
    - ✓ Appendix h-5.3.1: DAFF
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    - ✓ Appendix h-5.3.3: DMR
    - ✓ Appendix h-5.3.4: DEA
    - ✓ Appendix h-5.3.5: CAD Mapping
    - ✓ Appendix h-5.3.6: DCA
    - ✓ Appendix h- 5.3.7: PCC

## VOLUME 3 OF 4: PART D

- Appendix h-6: Information provided to Stakeholders
  - Appendix h-6.1: Background Information Document
  - Appendix h-6.2: Scoping and EIA report submission and other general matters
    - ❖ To DENC
    - ❖ To Department of Environmental Affairs Oceans and Coasts
    - ❖ To West Coast Resources Offices
    - ❖ To Koingnaas Mine Office
    - ❖ To Springbok Library
    - ❖ To Kleinsee Mariculture
    - ❖ Mining and Environmental Justice Community Network of South Africa
    - ❖ Department of Environmental Affairs
    - ❖ Hondeklipbay Community
    - ❖ Diamond Coast Abalone (Pty) Ltd
    - ❖ Kamiesberg Municipality
    - ❖ Namakhoi Local Municipality
    - ❖ Department of Agriculture Forestry and Fisheries
    - ❖ Department of Water and Sanitation
    - ❖ Department of Mineral Resources (Springbok)
    - ❖ Department of Environmental and Nature Conservation
    - ❖ Sanparks
    - ❖ Mr Gert Le Roux (DCA)
    - ❖ Department of Agriculture, Land Reform and Rural Development (Mr Jonker)

- Appendix h-7: Reply slip

Appendix 2.19.1: Socio-economic investigation and social and labour plan (Included as part of the EIAR (Section 10)

Appendix 2.19.2: Heritage/Archaeological study – Included as part of Volume 4 of the EIAR (Section 1)

Appendix I – Quantum Calculation



**Appendix h-5: Meetings**

**Appendix h-5.1: Agendas (included as part of minutes)**





## Agenda

- Welcome and introduction
- Objectives of the meeting
- Background on the project
  - Project description
- Potential Environmental Impacts
  - Specialist studies
- Environmental Impact Assessment approach
  - Listed Activities
  - Timeframes
  - Stakeholder roles
- Discussion session
- Way forward
- Closure



**Appendix h-5.2: Presentation (included as part of minutes)**



**Appendix h-5.3: Minutes**

**Appendix h-5.3.1: DAFF**



## Postnet Faerie Glen

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**From:** Babalwa Fatyi  
**Sent:** Thursday, September 22, 2016 07:37  
**To:** Sicelo Jebe  
**Subject:** Fwd: Thanks for using WeTransfer - file sent to michellepr@daff.gov.za (and 1 other)

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**To:** "Babalwa Fatyi" <Babalwa@myezo.co.za>  
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West Coast  
Resources



# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

## *Environmental Stewardship*

*WEST COAST RESOURCES – NAMAQUALAND MINES – ENVIRONMENTAL IMPACT ASSESSMENT*

*PROCEEDINGS OF THE MEETING FOR ENVIRONMENTAL IMPACT ASSESSMENT OVER THE EXISTING MINING  
RIGHT AREAS FOR KOINGNAAS RIGHT, SAMSON'S BAK RIGHT AND NAMAQUALAND PROSPECTING RIGHT,  
NAMAQUALAND MINES, IN NORTHERN CAPE*

*Document Name: WNE-PI-Meetings-Proceedings of the Meeting held with Department of  
Agriculture, Forestry and Fisheries (DAFF) on 03 June 2016*

*Document Status: Rev. 1*

*Date: 03 June 2016*

*Myezo Ref Number: WNE 2015/02/M*

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## WEST COAST RESOURCES – NAMAQUALAND MINES- ENVIRONMENTAL IMPACT ASSESSMENT

### ***PROCEEDINGS OF THE MEETING FOR ENVIRONMENTAL IMPACT ASSESSMENT OVER THE EXISTING MINING RIGHTS AREAS FOR KOINGNAAS RIGHT, SAMSON'S BAK RIGHT AND NAMAQUALAND PROSPECTING RIGHT, NAMAQUALAND MINES, IN NORTHERN CAPE***

***Document Name: WNE-PI-Meetings-Proceedings of the Meeting held with Department of Agriculture,  
Forestry and Fisheries (DAFF) on 03 June 2016***

***Myezo Ref Number: WNE 2015/02/M***

**Date:** 03 June 2016

**Time:** 13h00 -14h30

**Venue:** Department of Agriculture, Forestry and Fisheries (DAFF), Cape Town

#### **1. Welcome and Introduction**

The chairperson Mr. Asanda Njobeni (AN) welcomed all the meeting attendees. The attendees introduced themselves, and their details are outlined in the attendance register, included as Attachment 1.

#### **2. Attendance and Apologies**

A list of attendees is provided as Attachment 1. Fatima Daya (FD) who is now an Acting Director in her unit had other obligations to attend to. Imtiyaz Ismail (II) could not attend as well due to other commitments.

#### **3. Objectives of the Meeting**

Diamond Coastal Abalone (DCA) is the rights holder for the Northern Cape Zone 4 abalone ranching concession area and of the 16 potential abalone seeding sites identified by DCA in the NC Zone 4 Concession Area 13, are adjacent to and/or overlaps the West Coast Resources (Pty) Ltd (WCR) diamond mining concession area.

According to the issues raised during the environmental impact assessment (EIA) process by the DCA, a concern was expressed that the viability of the DCA abalone ranching initiative might be compromised if the majority of the suitable seeding sites in NC Zone 4 are not fully exploited. The DCA abalone ranching initiative would also not be viable if there was significant habitat destruction and/or if seeded abalone was impacted upon, through mining operations.

With this background, the objectives of the meeting were presented as follows:

- To discuss the matter pertaining to collaboration opportunities between WCR and DCA, as rights holders in terms of mining and abalone ranching rights legislation. The abalone ranching rights allocated over Zone 4 will fall over the WCR mining area.
- AN highlighted that, from the DAFF perspective, the issue at hand is not dealing or addressing the conflicting uses. There can be collaborations and the parties involved could work together to find the unifying opportunities.

#### **4. Discussion and Presentation**

##### **4.1. Background**

Bertus Cilliers (BC) provided a synopsis of the project background. West Coast Resources (WCR) intends to re-visit and mine certain areas along the Namaqualand Coast. WCR are re-establishing diamond mining operations in the existing mining rights areas, on the Namaqualand coast, previously mined by De Beers and under the existing mining rights of July 2012, i.e. Koingnaas Mining Right (522MRC) and Samson's Bak Mining Right (525MRC).

BC provided a synopsis of the project background. It was mentioned that WCR has an option to acquire the rights that are still held by De Beers over the Buffels Marine Complex. Prospecting data extend over 50 years and as such gives a level of confidence on the identified resources and targeted reserves. There is also existing mining activity. The converted rights of 2012 were fully transferred to WCR through Section 11 of Mineral and Petroleum Resources Development Act (MPRDA) in 2014.

This was mentioned to clarify a query by AN, on the WCR acquisition sequence of the historical De Beers rights, since there was also a mention of 2012 in the background documents.

The WCR shareholding with Trans Hex Operations (Pty) Ltd (Trans Hex), as a 40 % shareholder was explained and indicated that Trans Hex has a management contract to support WCR in operational aspects of the project.

##### **4.2 Project Description**

The process of open cast mining methods for land operations was explained as outlined in Slide 10, in the attached Attachment2. Surf zone and beach mining activities that will be undertaken are also indicated under the Presentation included as attachment 2.

The open sand beaches are characterised by natural high energy wave action and large volumes of sand are moved from the beach to deeper water during winter storms and brought back onshore during milder weather conditions. Beaches has been shown to replenish themselves as experienced in similar coastal environments and proven by previous specialist studies such as at the mouth of the Olifants River (Study



done by Dr Andrea Pulfrich). As part of this specialist investigation, Trans Hex had been engaged in a monitoring programme and eight beaches had been sampled. Council of Scientific and Industrial Research (CSIR) studies had also been undertaken and it had been noted that benthic communities recover after approximately five years.

The stretch (size) of each of the beaches along the coast to be mined are about 300 m for 68/69 to 600 m at Mitchell's Bay. The coffer dams extend out into the sea, a distance of about 200m.

#### **4.3 Background on Abalone Ranching Rights**

A background of the Abalone Ranching Rights was provided by AN on both the allocated aquaculture rights and the plot studies that DCA is venturing into. The pilot projects were kick-started in 2010 on the Namaqualand zones, as well as in the other 2 coastal provinces, which excluded KwaZulu Natal Province (KZN). The pilot will run for 10 years, with the aim of tracking performance, so that long term contracts can be issued to promote sustainable livelihoods. DCA commenced the pilot scale seeding of selected sites with different size cohorts of the abalone species, subsequent to attaining of these associated rights from DAFF. The DCA right is part of one of these seven rights issued by DAFF, to engage in abalone ranching or stock enhancement pilot projects to test technical, financial and environmental viability of abalone ranching.

DCA also has been funded to build a hatchery in Hondeklip Bay.

#### **4.4 Regulatory Environment and Current Interventions**

Marine Spatial Planning had been developed and is out for public review. This will avoid the future challenges of overlapping rights. There is a similar challenge in the Eastern Cape where the near shore activities are impacting in the MPA and ranching sites. The solutions explored and implemented at this coastline, included the collaborative public private partnership, where the security control to safeguard the product was provided by the private security company, who worked together with the compliance personnel from the government side.

This is just an example of co-existence and collaborative efforts which can be applied in other scenarios.

#### **4.5 Addressing the Issues Raised Reflecting the Impact of Mining on the Abalone Ranching Community.**

##### **Background on the EIA process**

BF provided background on the EIA process.

The issues that were raised by stakeholders were collated to be addressed in the succeeding EIA stage. DCA were amongst the stakeholders who raised issues to be addressed.

With respect to the issues that the DCA and abalone specific issues raised by Department of Agriculture, Forestry and Fisheries (DAFF), the aspects pertaining to the matters outlined below were identified as key.

- Interaction with other users or Future use Scenarios
  - Potential conflict with abalone ranching rights holders regarding water quality and habitat loss, particularly those companies that have already started seeding juveniles;
  - Increased turbidity near mining site(s) may compromise water quality at the seawater intakes to land-based abalone farms.
- **Water Quality**
  - The impacts of suspended sediment plumes and elevated turbidity as a result of mining operations need to be assessed;
  - Increased turbidity near mining site(s) may impact filter feeders.

Subsequent to the receipt of these issues, a response was provided to DCA that the issues had been noted and will be addressed in the succeeding EIA stage. As such, the Terms of Reference (ToR) were drawn up, to ensure that the issues, were investigated further to determine the potential impacts. The DCA had been given an opportunity to comment on the ToR and the issues below were suggested for incorporation into the ToR as part of that review process.

- A legal review of applicable legislation, with a specific focus on user and access rights;
- A review of suggested access arrangements;
- A cost comparison of seeding abalone from land vs boat based seeding;
- Identification of alternative areas for ranching in the Northern Cape Province and an assessment of the likelihood that these areas could be zoned for abalone ranching.

The ToR were also reviewed by DAFF. The ToR and the suggested input on the ToR by DCA is outlined in Slide 64-65.

A meeting was subsequently held with DCA to discuss the ToR and the EIA process. BF indicated that it was highlighted to DCA that there are also other dynamics to the matter of controlled access, which may need to be discussed separately from the EIA process, with WCR, who is handling these matters from a risk perspective.

There is also another aspect, which is engrained to this issue of controlled access and the co-existence of the two mining and ranching rights and this pertains to the matter of regulatory framework, which is being handled by the DAFF and the Department of Mineral Resources (DMR). As such, the legislative requirements and intended objectives of the applicable laws and guidelines would need to be looked at, on a more strategic level, than the EIA process. Inherent to these conditions, would be the Operation Phakisa operational

controls since both projects meet the Operation Phakisa objectives and the General Guidelines for Marine Ranching and Stock Enhancement in South Africa, which was Gazetted on 20 August 2010.

Feedback on the issues that were raised by the IAPs was provided and these issues are outlined in Slide 51-58. BF provided feedback on the meeting held. Details of which are in the notes of the meeting are presented as Attachment 3.

AN commented that this proposed specialist study is received as acceptable and will be good in determining the impacts of mining activities, however, the matter of access control still need to be finalised.



WNE-PI-M- Meeting with DAFF -14 September 2015

#### 4. Meeting Discussions

The discussions that were held during the meeting are covered under the presentation focus table, Table 4.1 below.

Discussion Points	Clarity and Recommendation	Responding Statements	Responsible Person if Action is Required
<p>1. Access Control</p>	<p>An alluded that the aspect that is pressing and which is not unique to the Northern Cape is that of access. Clarity was sought the ascertain if the MPRDA do give exclusive rights for access to the mining right holder?</p> <p>Government is obligated to act to release and unlock the commercial value of the ocean's natural resources. The closed gates along the coast that are not hindering the mandate of unlocking the economic potential of this part of the ocean and extract commercially viable species, are not seen as a challenge in this context.</p>	<p>The aspect of exclusivity would have to be investigated from a legal perspective, but currently the mining operations are governed by Mine Health and Safety and security control requirements.</p> <p>The Mine Health and Safety Act (MHSA) calls for strict control and liability resides with the mining company for safety control within their sites.</p> <p>BC mentioned that WCR has done a survey of existing open access along the coast. Statistical information that can be shared is available.</p> <p>WCR to share the available information regarding this statistical information.</p> <p>AN appreciated the gesture but noted that access control and</p>	<p>WRC</p>

WNE-PI-M- Meeting with DAFF -14 September 2015

Discussion Points	Clarity and Recommendation	Responding Statements	Responsible Person if Action is Required
		<p>availability has to be linked to the need for exploitation of commercially viable species. BF and BC indicated that the aquaculture specialist study will also look at the issue of access and this study will be finalised by end June 2016 to first week of July 2016.</p>	
2. Sustainability	<p>AN indicated that in addressing this tabulated challenge of a need for coexistence, any connotations that suggests sector superiority, should be avoided.</p> <p>For example: The mining might provide more jobs but resources get depleted and has a certain life span. Abalone might</p>		

WNE-PI-M- Meeting with DAFF -14 September 2015

Discussion Points	Clarity and Recommendation	Responding Statements	Responsible Person if Action is Required
	<p>provide few jobs but is a sustainable sector in the long term and will outlive mining and as such is part of sustainable livelihoods.</p> <p>A steering committee is being set up and its term of reference are being finalised.</p> <p>It seems there are no compatible uses at this stage. The DMR and DAFF have to be involved in the harmonisation and streamlining. A bilateral agreement is needed and Operation Phakisa already provides for that.</p>		
3. Public Access	Michelle enquired how the coastal public areas within the mining right areas are handled within the safety controls.	Kishan Sankar (KS) highlighted that according to Integrated Coastal Management Act (ICMA), reasonable access is required not unless there is conflicting use that prohibits that, such as blasting.	



WNE-PI-M- Meeting with DAFF -14 September 2015

Discussion Points	Clarity and Recommendation	Responding Statements	Responsible Person if Action is Required
4. Collaborative effort	<p>Zimasa Jika (ZJ) gave an example of the collaborative models that had worked in the region in the past, such as Alexkor and De Beers Kleinzee. This can be a lesson all parties can learn from.</p> <p>BF provided feedback on the meeting held. Details of which are in the notes of the meeting as Annexure 3.</p> <p>The manner in which access is handled currently, might be perceived as belittling the other sector and brings superiority complex and impression that the sectors are not equal within their mandatory rights.</p>	<p>The parties must learn from each other's activities. The ranchers must be educated to understand why these measures are taken. The engagement should be done with purity on intentions.</p>	WCR and DCA
5. Potential Risks	<p>If there is no consensus, the other party that is denied access, might mobilise support from the community using their influence and capitalising on current community concerns, of which access has always been an issue.</p>		