



# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

*Environmental Stewardship*

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Postnet Suite B165, Private Bag X18, Lynnwood  
Ridge, 0040, Pretoria, South Africa

645 Jacqueline Drive, Garstfontein, 0081  
Pretoria, South Africa

21 November 2016

Diamond Coast Abalone  
44 Oxford Street  
Durbanville  
Western Cape  
0081

**Attention:** Mr. Gert le Roux

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

**LETTER ADDRESSING COMMENTS FROM MR GERT LE ROUX 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 Mr. Le Roux's Comments**

**Date: 21 November 2016**

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

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

Dear Mr. Gert Le Roux

Subsequent to previous meetings and the incorporation of the comments into the Environmental Impact Assessment report (EIAR), your comments were more of presentation of the status quo. We have as such not amended the report since the impact that the mining would have on the abalone was already addressed and the risks associated with it were also indicated. Your formal presentation has been included in the final EIAR for submission to Department of Mineral Resources (DMR).

Your faithfully,

Babalwa Fatyi Pr.Sci.Nat

**Director**

## Postnet Faerie Glen

---

**From:** Babalwa Fatyi  
**Sent:** 31 October 2016 10:22 AM  
**To:** Le Roux, G <glr@sun.ac.za> <glr@sun.ac.za>  
**Cc:** Lourens <lourens@myezo.co.za>; Tiisetso Koko <Tiisetso@myezo.co.za>  
**Subject:** RE: DCA Comments on WCR EIA Report

Dear Mr Le Roux

Thank you for your input into the environmental impact assessment process for West Coast Resources.

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

Wishing you a productive week ahead.

Kind Regards

**Babalwa Fatyi Pr.Sci.Nat**  
Director  
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Warm regards

Babalwa

**From:** Le Roux, G <glr@sun.ac.za> [<mailto:glr@sun.ac.za>]  
**Sent:** Saturday, October 29, 2016 8:38 AM  
**To:** Babalwa Fatyi <[Babalwa@myezo.co.za](mailto:Babalwa@myezo.co.za)>  
**Cc:** Lourens <[lourens@myezo.co.za](mailto:lourens@myezo.co.za)>  
**Subject:** DCA Comments on WCR EIA Report

Dear Ms Fatyi

Attached please find our comments on the environmental impact assessment and environmental management programme report 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.

Best regards

Gert le Roux

Director

Diamond Coast Abalone (Pty) Ltd

The integrity and confidentiality of this email is governed by these terms / Hierdie terme bepaal die integriteit en vertroulikheid van hierdie epos. <http://www.sun.ac.za/emaildisclaimer>

**Response to Markus Dawid (Hondelklipbay Community)**

## Postnet Faerie Glen

---

**From:** Babalwa Fatyi  
**Sent:** 02 November 2016 09:26 AM  
**To:** [dawidmarkus@hotmail.com](mailto:dawidmarkus@hotmail.com)  
**Cc:** Tiisetso Koko <[Tiisetso@myezo.co.za](mailto:Tiisetso@myezo.co.za)>  
**Subject:** West Coast Resources Environmental Impact Assessment report notification

Dear Mr Markus

We are well, thank you for your concern.

It was indeed an insightful speech by Ms Thuli Madonsela and we are all progressively learning from it and you are purposefully taking a stand as an active citizen to implement the objectives of such good governance. We are all, in our various roles, through these processes developing, to be responsible stewards of good governance and indeed, our environment.

We, as Myezo, would have at least, though, expected you to voice this concern, 30 days ago, when you received notification and as such when you realised that the review locations were further from your reach. Then logistical arrangements would have been amicably made within the review time frame. We had reasonably understood that you had access to the report, since you had commented on it during the scoping stage. For that, we thank you for exercising your constitutional right and participating in this process and taking responsibility for such participation, by at least making means to comment on the scoping report.

Since the commenting period has ended, we are finding solutions to consider your humble request and will have to negotiate with you that if the time can be extended, (within the time constraints of legal submission timelines) you at least get a week for review, to enable the process to still meet its legal obligations, for submission of the environmental impact assessment to the competent authorities.

May you give us until end of today to come back to you with the logistics and whether your request for extension is granted and how this will be logistically achieved.

Thank you once more, sir, for your contact.

Kind Regards

**Babalwa Fatyi Pr.Sci.Nat**

Director

**M** +27 82 772 2418 | **T** +27 12 998 7642 | **F** + 27 012 998 7641 | **Fax to email** + 27 86 543 1698

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

From: dawid markus <[dawidmarkus@hotmail.com](mailto:dawidmarkus@hotmail.com)>

Date: 2016/11/02 03:09 (GMT+02:00)

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

Subject: Re: West Coast Resources Environmental Impact Assessment report notification

Greetings. Hope you are well. The SwartLinjes mine are within the borders (5km) from Hondeklipbay (HKB). There is a library in HKB and we cant see a logic reason why the report was not placed in HKB library. We have to go exactly 390km (return) to Springbok to see it or to go to the office of the mines in a restricted area to see it. Parow is 1200 km (return) away from us. How must we as poor people who are directly affected getting there?

"This communication serves to notify registered interested and affected parties (I&APs), for the above mentioned project, that the Environmental Impact Assessment (EIA) and Environmental Management Programme report (EMPr) is now available for review." For all practical reasons there is and was only notification and NO a chance to review it. This is not procedural fair. The mere fact that you did not put it in HKB library complicates things and makes it impossible to engage fairly and properly.

Poverty makes us unequal and exclusions are based on our what we have. Please respect the rule of law and the intention of the legislation. The Environmental Impact Assessment (EIA) and Environmental Management Programme report (EMPr) is and was never available for review to the I&AP's on the merits.

When there is no good governance things falls apart. GOOD GOVERNANCE is important for the following reasons: to manage collective affairs, Paticipation, Respect for the Rule of Law, Transparency. 4.Response, Consent, Equity and Equality.

Please make the EMPr EIA available in HKB library to the poor who do not have means to access it. Furthermore we respectfully request that you give us time to to respond after the review. Please must stop the whole process because it was not procedural fair. Regards. Dawid Markus 0719508523

Sent from my Samsung Galaxy smartphone.

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

From: Admin <[admin@myezo.co.za](mailto:admin@myezo.co.za)>

Date: 27/09/2016 10:49 (GMT+02:00)

To: [dawidmarkus@hotmail.com](mailto:dawidmarkus@hotmail.com)

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 Ref No: WKSCE/2015/02/NL**

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

This communication serves to notify registered interested and affected parties (I&APs), for the above mentioned project, that the Environmental Impact Assessment (EIA) and Environmental Management Programme report (EMPr) is now available for review.

A copy of the EIA report can be viewed at:

1. Koinaas Mine offices (30° 12' 38.64"S, 17° 16'25.34E);
2. Springbok Library (04 Namakwa Street, Springbok, Northern Cape, 8240); and
3. West Coast Resources head office at (405 Voortrekker Road, Parrow, 7500).

On receipt of the EIA report, please note that it is divided into four volumes:

- Volume 1- (Environmental Impact Assessment report and Environmental Management Programme report (Part A, Section 1 - Sub-Section iv);
- Volume 2- (Environmental Impact Assessment report and Environmental Management Programme report (Part A, Sub-Section v - Part B);
- Volume 3- (Public participation and supporting documentation (Appendices 1-h-6 including Appendix 2.19.1-2);
- Volume 4- Specialist investigations.

The details regarding the commenting period time frames is indicated in the letter, which is attached in this email. For ease of reference the comments should be submitted by 29 October 2016 in writing and sent to the Environmental Assessment Practitioner (EAP) on the following details:

Attention: Ms. B. Fatyi  
Address: Postnet Suite B165, Private Bag X18, Lynnwood Ridge, 0040, Pretoria  
Telephone: 012 998 7642  
Cell-phone no: 082 772 2418  
Email: [babalwa@myezo.co.za](mailto:babalwa@myezo.co.za)  
Fax to email: 086 543 1698

Yours faithfully

Lizzie Magobeya

Office Administrator:

T +27 12 998 7642 | F + 27 012 998 7641 C +27 78 343 6788

E [admin@myezo.co.za](mailto:admin@myezo.co.za) | [www.myezo.co.za](http://www.myezo.co.za)







# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

*Environmental Stewardship*

DOCUMENT ADDRESSING COMMENTS FROM MR DAWID MARKUS 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 LAC Document to Mr. Dawid Markus

Myezo Ref NO: VRB/2016/08/BAR

Date: 10 November 2016

Tel: 012 998 7642 | Telefax: 012 998 7641 | Cell: 082 772 2418 | email: [babalwa@myezo.co.za](mailto:babalwa@myezo.co.za)

Postnet Suite B165, Private Bag X18, Lynnwood Ridge, 0040, Pretoria, South Africa 645 Jacqueline Drive, Garsfontein,  
0081, Pretoria, South Africa

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regards to the physical placement and online availability of the reports for public review, then it would, in its eventuality, be compliant with Regulation 23 (1)(a) of the National Environmental Management Act. (Act 107 of 1998): Environmental Impact Assessment regulations, 2014 which stipulates the following:

*"The applicant must within 106 days of the acceptance of the scoping report submit to the competent authority*

*(a) an environmental impact report inclusive of any specialist reports, and an EMPr, which must have been subjected to a public participation process of at least 30 days and which reflects the incorporation of comments received, including any comments of the competent authority"*

As well as Regulation 40, subregulations (2)(d) and (3) of the same Act which stipulates the following:

*"(2) The public participation process contemplated in this regulation must provide access to all information that reasonably has or may have the potential to influence any decision with regard to an application unless access to that information is protected by law and must include consultation with (d) all potential, or, where relevant, registered interested and affected parties."*

*"(3) Potential or registered interested and affected parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the competent authority."*

3.2 Other regulations and processes that were followed to make sure the public participation process was as procedurally fair as possible include (in relevance to this issue), but is not limited to the following:

3.2.1 According to Regulation 41 (2)(a) of the National Environmental Management Act. (Act 107 of 1998): Environmental Impact Assessment regulations, 2014, following needs to be done:

*"The person conducting a public participation process must take into account any relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by*

*(a) fixing a notice board at a place conspicuous to and accessible by the public at the boundary, on the fence or along the corridor of*

*relevant guidelines applicable to public participation as contemplated in section 24J of the Act and must give notice to all potential interested and affected parties of an application or proposed application which is subjected to public participation by*

*(c) placing an advertisement in*

*(i) one local newspaper; or*

*(ii) any official Gazette that is published specifically for the purpose of providing public notice of applications or other submissions made in terms of these Regulations;”*

3.2.3 It was also our reasonable conclusion that the community would successfully be reached, since there was a submission that was received by Myezo, from yourself on 18 April 2016, via a fax to e-mail service. In this submission, you 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 you. 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 yourself. 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.

3.3 You request from Myezo we respect the rule of law and the intention of the regulation. It is therefore important that we make reference to Regulation 40 (1) of the National Environmental Management Act. (Act 107 of 1998): Environmental Impact Assessment regulations, 2014, which stipulates that:

*“The public participation process to which the*

*(a) basic assessment report and EMPr, and where applicable the closure plan, submitted in terms of regulation 19; and*

*(b) scoping report submitted in terms of regulation 21 and the environmental*

*impact assessment report and EMPr submitted in terms of regulation 23; was subjected to must give all potential registered interested and affected parties, including the competent authority, a period of at least 30 days to submit comments on each of the basic assessment report, EMPr, scoping report and environmental impact assessment report, and where applicable the closure plan, as well as the report contemplated in regulation 32, if such reports or plans are submitted at different times.”*

**Attachment 1**

**Photographic evidence of Site notices.**

**Attachment 2**

**Notification Letter to interested and affected parties about the review period for the EIAR and EMPr as sent on 27 September 2016.**

(Take note that this letter, as it is attached to this document contains its own 2 attachments namely: "Attachment 1 - Locality Map" and "Attachment 2 - Project Milestones")

Consequently, please be advised that this notice serves to invite registered IAPs to now participate in the EIA report review stage. A copy of the EIA report can be viewed at Koingnaas Mine offices (30° 12' 38.64"S, 17° 16' 25.34E), Springbok Library (04 Namakwa Street, Springbok, Northern Cape, 8240) and at West Coast Resources head office at (405 Voortrekker Road, Parrow, 7500).

To submit your comments on the EIA report, kindly contact Myezo using the details shown below. The submissions must all be done formally and in writing by either email or fax and should be submitted by 29 October 2016, which signifies the end of the commenting period. In the submissions of comments, the IAPs, must disclose any direct business, financial, personal or other interest which they have in the approval or refusal of the application.

**Contacts: Environmental Assessment Practitioner (EAP)**

Myezo Environmental Management Services (Pty) Ltd

Contact person: Ms Babalwa Fatyi

Tel: (012) 998 7642

Fax: 086 543 1698

Cell: (082) 7722 418 (Babalwa)


E-mail: [babalwa@myezo.co.za](mailto:babalwa@myezo.co.za)

Address: Postnet Suite B165, Private Bag X 18, Lynwood Ridge, 0040, Pretoria, South Africa

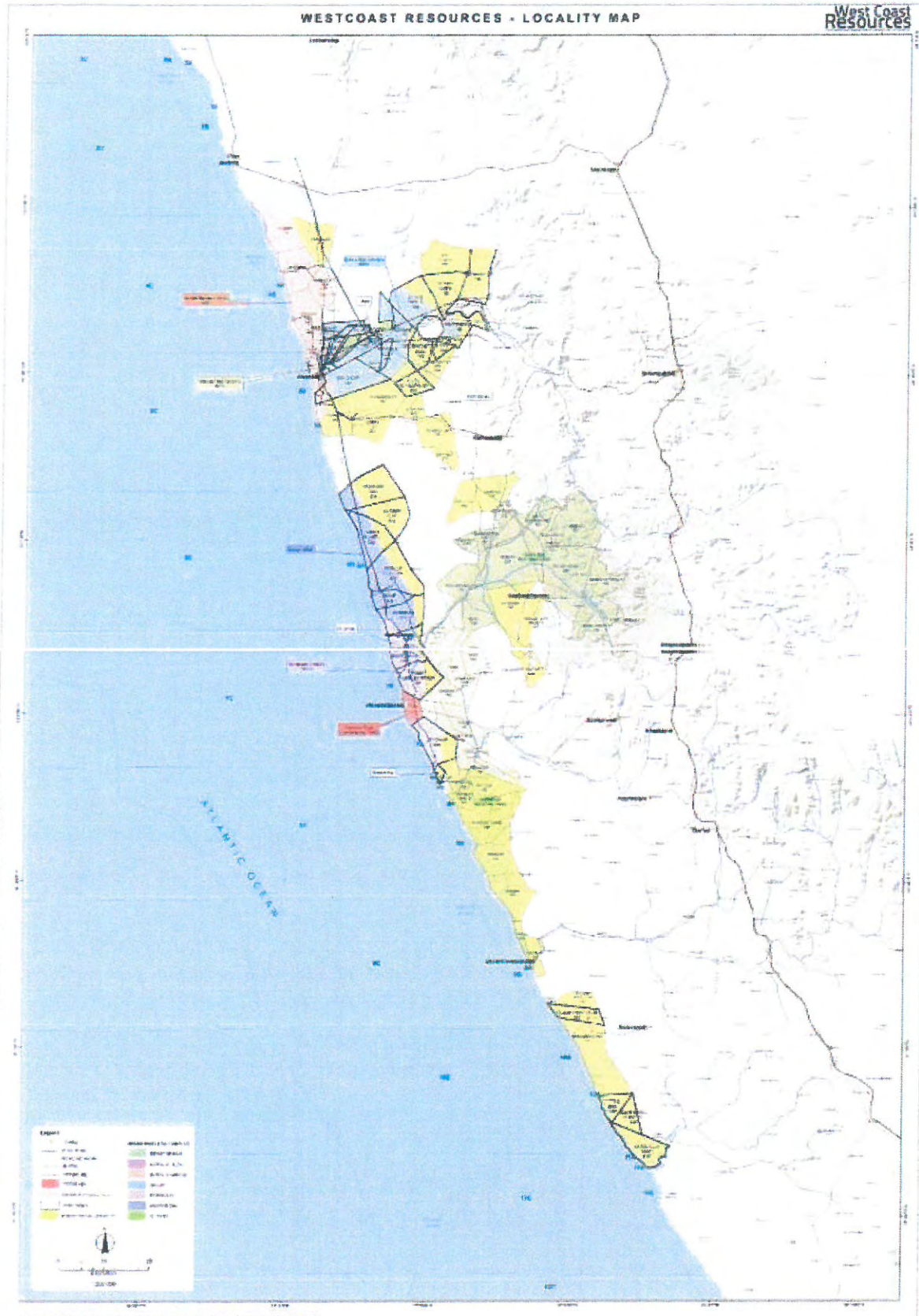
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Yours faithfully

  
Babalwa Fatyi *Pr. Sci.Nat*  
Director



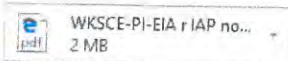




WKSCE 2015/02/RL  
 DMR Ref No: NC0043-MR/102 and NC0044-MR/102

September 2016

BF



**From:** Admin  
**Sent:** 27 September 2016 10:46 AM  
**To:** 'dawidmarkus@hotmail.com' <dawidmarkus@hotmail.com>  
**Subject:** West Coast Resources Environmental Impact Assessment report notification

Dear Interested and affected party (IAP)

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**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*

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

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Cell-phone no: 082 772 2418  
Email: [bahakwa@myezo.co.za](mailto:bahakwa@myezo.co.za)  
Fax to email: 086 543 1698

Yours faithfully

Lizzie Magobeya  
Office Administrator  
T +27 (0) 21 998 7642 | F +27 (0) 21 998 8788  
E [admin@myezo.co.za](mailto:admin@myezo.co.za) | [www.myezo.co.za](http://www.myezo.co.za)

**From:** dawid markus [<mailto:dawidmarkus@hotmail.com>]

**Sent:** 27 September 2016 01:17 PM

**To:** Admin <[admin@myezo.co.za](mailto:admin@myezo.co.za)>

**Subject:** Read: West Coast Resources Environmental Impact Assessment report notification

Your message

**To:** dawid markus

**Subject:** West Coast Resources Environmental Impact Assessment report notification

**Sent:** Tuesday, September 27, 2016 10:48:57 AM (UTC+02:00) Harare, Pretoria

was read on Tuesday, September 27, 2016 1:16:31 PM (UTC+02:00) Harare, Pretoria.

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

From: dawid markus <[dawidmarkus@hotmail.com](mailto:dawidmarkus@hotmail.com)>

Date: 2016/11/02 03:09 (GMT+02:00)

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

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0719508523

**Response to DENC**



# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

*Environmental Stewardship*

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645 Jacqueline Drive, Garstfontein, 0081  
Pretoria, South Africa

21 November 2016

SASKO Building  
90 Long Street  
Private Bag X6102  
Kimberley  
8300

**Tel:** 053-8077300

**Fax:** 053-8077328

**Attention:** Ms. Wilna Opperl

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

LETTER ADDRESSING COMMENTS FROM DEPARTMENT OF ENVIRONMENT AND NATURE CONSERVATION  
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 DENC comments

**Date:** 17 November 2016

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

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

Dear Ms. Opperl

This communication serve as a response to the comments received from Department: Environment and Nature Conservation (DENC) and I trust you will receive it in good order. Please take note that the comments as per the document from DENC are copied into this document as images of the original document and each response of ours will follow directly underneath it.



# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

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Ridge, 0040, Pretoria, South Africa

645 Jacqueline Drive, Garstfontein, 0081  
Pretoria, South Africa

**Table 1: How comments on the Scoping Report has been addressed in the EIA report:**

<b>Comments on Scoping Report</b>	<b>How it has been addressed in final EIA</b>
<p>The areas that will be disturbed should be checked against the Northern Cape Critical Biodiversity Area Map, and the total area that will be disturbed in each category should be indicated. The consultant should note that in addition to the 2008 Namakwa Biodiversity Sector Plan, there is also a new draft Northern Cape CBA map that should be considered (Available from the Northern Cape Department of Environment and Nature Conservation, Enrico Oosthuysen, <a href="mailto:enricooosthuysen@gmail.com">enricooosthuysen@gmail.com</a>)</p>	<p>A map showing the relation between the mining area and the new Northern Cape CBA map has been included (EIA page 287). It is indicated that the entire study area falls within CBA1 and CBA2 areas (page 288), but the EIA also indicates on the same page that the entire study area is located in an Ecological Support Area (this is old information, only the most recent information should be used to avoid confusion). The total area that will be disturbed in each category (CBA1 or CBA2) has not been included.</p>

The Critical Biodiversity Map (latest version) for the Northern Cape Province was indeed used in the botanical section of the biodiversity study (the link for downloading the shapefiles was obtained from Mr Enrico Oosthuysen). These maps were carefully applied. See, as attachment 2 of this letter, the Northern Cape Critical Biodiversity Areas map, which is now, showing the total areas that will be disturbed in each category. This is included in Volume 1, Part A, Section 1 of the EIA report.

Given the level of the survey undertaken, and with reference to other studies on the Namaqualand Coast, as much detail as possible was given in the botanical section of the biodiversity assessment with respect to endangered or rare plant species. It is well-known that the vegetation does not harbour many species of conservation concern because it is found over a wide expanse in relatively uniform habitats. Occurrence of important species such as *Wooleya farinosa* was highlighted in the botanical section of the biodiversity assessment. By being aware of such 'indicator species' and ensuring sensitivity towards them, other species that may occur in the same plant communities would be conserved by default.

It should be noted that the botanical survey was not a comprehensive phytosociological survey (where the majority of species would be noted) as stated on page 53 of the biodiversity assessment report. Should such a survey be necessary it would have to be specially commissioned and the necessary considerable resources set aside for its compilation as an academic exercise. It would have to be carried out over a number of years. This was not the aim of the study conducted here which was done at a high level to obtain the most information in the shortest time for the environmental process.





**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

The impacts of the storage of sea water in a	Not indicated. Mitigation measures should be in
--	---

dams (as stated on page 63), should be more thoroughly investigated and explained.	place to ensure that sea water or salt from sea water cannot contaminate any of the ground water aquifers, which are still used to supply water to Koingnaas and Hondeklip bay (page 312)
--	---

As pointed out in the report, groundwater quality in the study area deteriorates from the north to the south. Water supply to Koingnaas and Hondeklipbay is sourced from the Somnaas Noup Aquifer located about 20 km north of Koingnaas, in an area with marginally good quality water. No mining activities with potential to contaminate groundwater are anticipated in this area and can be found in Volume 4, Section 6, Sub-section 4.5, Water supply of the Geohydrological report.

**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

1. Coastal and sea mining activities should be planned and spaced in such a way that there will always be a nearby, undisturbed habitat of the same type as the one that is being disturbed nearby. For example, if a sandy beach is mined, there should be another sandy beach nearby that is left completely undisturbed, until the originally mined beach has been rehabilitated to such an extent that it can again support its original inhabitants.	Not indicated.
---	----------------

As there are not that many sandy beaches along the coastline of concessions 6a, 7a and 8a this is difficult to achieve in the way it has been worded. There are, however, beaches in 6a and 8a that have not been identified as mining targets, or are located in the proposed MPA, which would serve as the 'undisturbed habitat of the same type'. A further potential mitigation for this is to mine beaches sequentially in blocks from north to south, rehabilitating immediately on cessation of activities in a block, or to not mine all targets simultaneously.



**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

<p>2. <i>Scoping report page 77:</i> The table only gives the total area that will be disturbed at each site. In the final EIA, a table should also specify the specific coastal and benthic habitat types that will be disturbed, how much of each habitat type will be disturbed, and the threat status of the habitat types according to the 2011 National Biodiversity Assessment.</p>	<p>Indicated on page 382.</p>
--	-------------------------------

As noted.

**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

<p>3. <i>Scoping report page 269:</i> The proposed mitigation measure of the placement of slimes dams close to the ocean so that any seepage will take place directly into the ocean needs more careful consideration and investigation. The effects of such seepage on the coastal environment and sands, and the duration of any such effects should be indicated. In my opinion such seepage will cause irreversible</p>	<p>It is still indicated that seepage will occur from slimes dams to the sea. Such seepage can form "streams" of saltwater running from the slimes dam to the sea, or form an area contaminated with sludge and mud seaward of the slimes dam. The soils of such contaminated areas will be very difficult or impossible to rehabilitate. Seepage should be managed better than proposed here to prevent such contamination of land seaward of the</p>
---	--

<p>damage to soils and coastal environments, and I would not recommend granting and Environmental Authorisation if there is any probability of seepage taking place from slimes dams. Alternative measures to contain and prevent any seepage should be investigated and implemented before and Environmental Authorisation for such an activity could be granted.</p>	<p>slimes dams. Just allowing seepage back to the sea as a "natural process" is not sufficient.</p>
--	---



The slimes dams will be positioned such that seepage into the surrounding environment is avoided and the measures prescribed by Department of Water and sanitation as part of the licencing conditions will be upheld. Soil amelioration strategies will be developed and implemented and affected areas will be identified through the monitoring activities.

*Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)*

- |  |   |
|--|---|
| 4. <i>Scoping report page 218:</i> The final EIA should include a more thorough description of the endangered or rare plant species in the area. | Included in the Biodiversity Specialist Assessment. |
|--|---|

As noted.

*Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)*

- |   |  |
|---|--|
| 5. <i>Scoping report page 269:</i> I do not agree that the significance of this activity (slimes disposal) is low. The reason behind this rating should be motivated. | The significance of this activity is now indicated as medium (with mitigation). The slimes will contain sea water, and contaminate soil with salt, it is difficult or impossible to rehabilitate such contaminated soils over such a large extent. |
|---|--|

This is noted and the significance of this activity is high due to the soil contamination with sea salt that poses rehabilitation challenges.

*Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)*

- |  |  |
|--|--|
| 6. <i>Scoping report page 271:</i> The life of mine has previously been indicated as 11 years. Therefore I do not agree to the significance rating of the socio-economic impact of "long term". On page 273 the definition of long term is given as more than 15 years, permanent or beyond closure. | Significance rating is changed to "medium term". |
|--|--|

As noted.



## Coastal Access

- At the recent PCC meeting on 28 September 2016 the WCR representative gave assurance that the portion of Somnaas that is currently open for the public will remain open and that access will not be affected by the mining operations. We want WCR also to consider managed access to areas that does not pose high risks in terms of diamond security.

The requested consideration was included in Volume 2 Part B, Table (d) (ix) 1-1: Measures to rehabilitate the environment affected by the undertaking of any listed activity, Surf Zone Related Impacts, Subheading 1.

### • Socio-Economic Interests

"The mitigation says avoid kelp cutting where unnecessary"- Value could be added if the land-based abalone farmers can utilize the cut kelp for abalone feed? However, this will be based on practicality; perhaps an option, that could be discussed with NC Abalone Working Group

This was considered and added as an option to Volume 2, Part B, Table (d) (ix) 1-1: Measures to rehabilitate the environment affected by the undertaking of any listed activity, Section: Surf Zone Related Mining Activities, Activity 3.

### Social Impact Assessment (SIA):

- It is indicated that the impacts on the aquaculture industry is not included in the Social Impact Assessment because it has been evaluated in a different Specialist Study, but the key findings of the Aquaculture Specialist Study *should* be included in the Social Impact Assessment because it is of a high social impact significance (sustainable aquaculture jobs vs. un-sustainable mining jobs). If only indicated in one of the many additional specialist studies this important impact may be missed.
- SIA Page ii: States that Hantam Local Municipality IDP is applicable. This is not correct, the activities will fall in the Kamiesberg Local Municipality, and therefore it is the Kamiesberg Local Municipality IDP that should be considered.
- SIA Page iii: It is stated that "A significant portion of the annual wage bill is and will be earned by HD members from the area and will be spent in local towns of the area", but I think it is important that it should be indicated more clearly how large this portion of the wage bill will be (in percentage or in actual numbers).
- SIA Page 31: The names of the district municipalities given on page 31 of the Social Impact Assessment (SIA) under paragraph 3.3 is out-dated.



impacts on the aquaculture study is included in Volume 4, Section 10.1, Sub-section 4.3.8 of the SIA report.

Namakwa District Municipality Integrated Development Plan Namakwa District Local Economic Development Plan were added in Volume 4, Section 10, page ii under the heading Policy and Planning fit of the SIA report.

The actual percentage of the annual wage bill has been specified Volume 4, Section 10,1 on pages ii and iii under the heading: Operational Phase Social Impacts, sub-heading: Employment, of the SIA report.

The names of the district municipalities were updated in Volume 4, Section 10.1, Sub-section 3.3 of the SIA report.

#### **Water Quality Records:**

- It indicates that water Quality Records will be recorded and send to ..... No indication whereto.

Elevated Nitrate levels will have a potential negative impact on crayfish operations. No mentioning

is made on what mitigating measures will be put in place.

No indicated in Volume 2, Part B, Table (d) (ix) 1-1: Measures to rehabilitate the environment affected by the undertaking of any listed activities, Section Surf Zone related impacts, Activity 4

As well as in Volume 2, Part B, Monitoring and Management, Section G, Reporting on Water Quality,

#### **Ground water study**

- It is good to see that a groundwater study has been included, and that measure to prevent contamination of ground water is included in EMPR (page 12). Contamination of ground water with additional salt should be prevented. Although the ground water in the area is not of good quality, it is still used to supply Koingnaas and Hondeklipbay with water. Groundwater will still be used and needed long after the life of mine, and should be protected at all cost.

"Contamination of groundwater with additional salt should be prevented"

This has been addressed by the recommendation that all waste containment facilities (including tailings dams) should be lined with impermeable material to prevent seepage into underlying groundwater resources and can be found in Volume 4, Section 6, Sub-section 11 of the Geohydrological report.

"Although groundwater in the area is not of good quality, it is still used to supply Koingnaas and Hondeklip bay"

As pointed out in the report, groundwater quality in the study area deteriorates from the north to the south. Water supply to Koingnaas and Hondeklipbay is sourced from the Somnaas Noup Aquifer located about 20 km north of Koingnaas, in an area with marginally good quality water. No mining activities with potential to contaminate groundwater are anticipated in this area and can be found in Volume 4, Section 6, Sub-section 4.5 of the Geohydrological report.



## 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. Bl. 388-Part A: Volume 1 oyster farming at the ORM are still mentioned in the report.



# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

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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**





# MYEZO ENVIRONMENTAL MANAGEMENT SERVICES

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Ridge, 0040, Pretoria, South Africa

645 Jacqueline Drive, Garstfontein, 0081  
Pretoria, South Africa

**From:** Admin  
**Sent:** 28 September 2016 08:05 AM  
**To:** 'petrus.Schreuder@sanparks.org' <[petrus.Schreuder@sanparks.org](mailto: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 Ref No:** WKSCE/2015/02/NL

**DMR Ref No:** 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](mailto:elanza.vanlente@sanparks.org)>  
**Subject:** West Coast Resources Environmental Impact Assessment report notification

Dear Interested and affected party (IAP)

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**Date:** 27 September 2016

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

**DMR Ref No:** 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](mailto: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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## Attachment 2

### Map showing Koingnaas Critical Biodiversity areas



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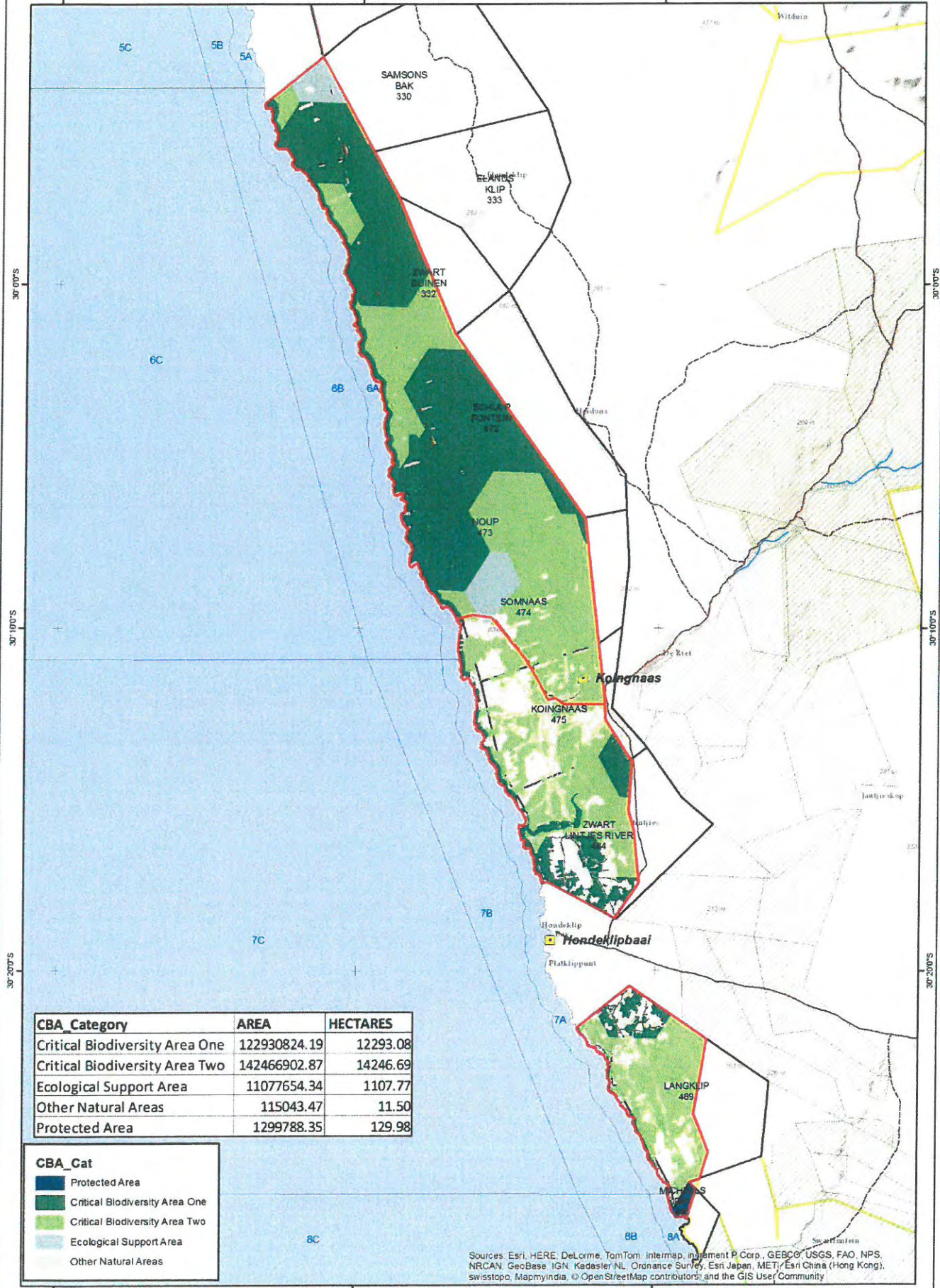
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PLAN SHOWING KOINGNAAS CRITICAL BIODIVERSITY AREAS

West Coast Resources





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645 Jacqueline Drive, Garstfontein, 0081  
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21 November 2016

SASKO Building  
90 Long Street  
Private Bag X6102  
Kimberley  
8300

**Tel:** 053-8077300  
**Fax:** 053-8077328

**Attention:** Ms. Wilna Oppel

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

LETTER ADDRESSING COMMENTS FROM DEPARTMENT OF ENVIRONMENT AND NATURE CONSERVATION  
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 DENC comments

**Date:** 17 November 2016

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

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

Dear Ms. Oppel

This communication serve as a response to the comments received from Department: Environment and Nature Conservation (DENC) and I trust you will receive it in good order. Please take note that the comments as per the document from DENC are copied into this document as images of the original document and each response of ours will follow directly underneath it.



**Table 1: How comments on the Scoping Report has been addressed in the EIA report:**

<b>Comments on Scoping Report</b>	<b>How it has been addressed in final EIA</b>
<p>The areas that will be disturbed should be checked against the Northern Cape Critical Biodiversity Area Map, and the total area that will be disturbed in each category should be indicated. The consultant should note that in addition to the 2008 Namakwa Biodiversity Sector Plan, there is also a new draft Northern Cape CBA map that should be considered (Available from the Northern Cape Department of Environment and Nature Conservation, Enrico Oosthuysen, <a href="mailto:enricooosthuysen@gmail.com">enricooosthuysen@gmail.com</a>)</p>	<p>A map showing the relation between the mining area and the new Northern Cape CBA map has been included (EIA page 287). It is indicated that the entire study area falls within CBA1 and CBA2 areas (page 288), but the EIA also indicates on the same page that the entire study area is located in an Ecological Support Area (this is old information, only the most recent information should be used to avoid confusion). The total area that will be disturbed in each category (CBA1 or CBA2) has not been included.</p>

The Critical Biodiversity Map (latest version) for the Northern Cape Province was indeed used in the botanical section of the biodiversity study (the link for downloading the shapefiles was obtained from Mr Enrico Oosthuysen). These maps were carefully applied. See, as attachment 2 of this letter, the Northern Cape Critical Biodiversity Areas map, which is now, showing the total areas that will be disturbed in each category. This is included in Volume 1, Part A, Section 1 of the EIA report.

Given the level of the survey undertaken, and with reference to other studies on the Namaqualand Coast, as much detail as possible was given in the botanical section of the biodiversity assessment with respect to endangered or rare plant species. It is well-known that the vegetation does not harbour many species of conservation concern because it is found over a wide expanse in relatively uniform habitats. Occurrence of important species such as *Wooleya farinosa* was highlighted in the botanical section of the biodiversity assessment. By being aware of such 'indicator species' and ensuring sensitivity towards them, other species that may occur in the same plant communities would be conserved by default.

It should be noted that the botanical survey was not a comprehensive phytosociological survey (where the majority of species would be noted) as stated on page 53 of the biodiversity assessment report. Should such a survey be necessary it would have to be specially commissioned and the necessary considerable resources set aside for its compilation as an academic exercise. It would have to be carried out over a number of years. This was not the aim of the study conducted here which was done at a high level to obtain the most information in the shortest time for the environmental process.





**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

The impacts of the storage of sea water in a	Not indicated. Mitigation measures should be in
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**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

1. Coastal and sea mining activities should be planned and spaced in such a way that there will always be a nearby, undisturbed habitat of the same type as the one that is being disturbed nearby. For example, if a sandy beach is mined, there should be another sandy beach nearby that is left completely undisturbed, until the originally mined beach has been rehabilitated to such an extent that it can again support its original inhabitants.	Not indicated.
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*Environmental Stewardship*

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**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

- |   |                        |
|---|------------------------|
| 2. <i>Scoping report page 77:</i> The table only gives the total area that will be disturbed at each site. In the final EIA, a table should also specify the specific coastal and benthic habitat types that will be disturbed, how much of each habitat type will be disturbed, and the threat status of the habitat types according to the 2011 National Biodiversity Assessment. | Indicated on page 382. |
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As noted.

**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

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| 3. <i>Scoping report page 269:</i> The proposed mitigation measure of the placement of slimes dams close to the ocean so that any seepage will take place directly into the ocean needs more careful consideration and investigation. The effects of such seepage on the coastal environment and sands, and the duration of any such effects should be indicated. In my opinion such seepage will cause irreversible | It is still indicated that seepage will occur from slimes dams to the sea. Such seepage can form "streams" of saltwater running from the slimes dam to the sea, or form an area contaminated with sludge and mud seaward of the slimes dam. The soils of such contaminated areas will be very difficult or impossible to rehabilitate. Seepage should be managed better than proposed here to prevent such contamination of land seaward of the |
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damage to soils and coastal environments, and I would not recommend granting and Environmental Authorisation if there is any probability of seepage taking place from slimes dams. Alternative measures to contain and prevent any seepage should be investigated and implemented before and Environmental Authorisation for such an activity could be granted.	slimes dams. Just allowing seepage back to the sea as a "natural process" is not sufficient.
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The slimes dams will be positioned such that seepage into the surrounding environment is avoided and the measures prescribed by Department of Water and sanitation as part of the licencing conditions will be upheld. Soil amelioration strategies will be developed and implemented and affected areas will be identified through the monitoring activities.

**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

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| 4. <i>Scoping report page 218:</i> The final EIA should include a more thorough description of the endangered or rare plant species in the area. | Included in the Biodiversity Specialist Assessment. |
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As noted.

**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

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|---|--|
| 5. <i>Scoping report page 269:</i> I do not agree that the significance of this activity (slimes disposal) is low. The reason behind this rating should be motivated. | The significance of this activity is now indicated as medium (with mitigation). The slimes will contain sea water, and contaminate soil with salt, it is difficult or impossible to rehabilitate such contaminated soils over such a large extent. |
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This is noted and the significance of this activity is high due to the soil contamination with sea salt that poses rehabilitation challenges.

**Table 1: How comments on the Scoping Report has been addressed in the EIA report: (continued)**

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| 6. <i>Scoping report page 271:</i> The life of mine has previously been indicated as 11 years. Therefore I do not agree to the significance rating of the socio-economic impact of "long term". On page 273 the definition of long term is given as more than 15 years, permanent or beyond closure. | Significance rating is changed to "medium term". |
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As noted.



### Coastal Access

- At the recent PCC meeting on 28 September 2016 the WCR representative gave assurance that the portion of Somnaas that is currently open for the public will remain open and that access will not be affected by the mining operations. We want WCR also to consider managed access to areas that does not pose high risks in terms of diamond security.

The requested consideration was included in Volume 2 Part B, Table (d) (ix) 1-1: Measures to rehabilitate the environment affected by the undertaking of any listed activity, Surf Zone Related Impacts, Subheading 1.

- **Socio-Economic Interests**

"The mitigation says avoid kelp cutting where unnecessary" - Value could be added if the land-based abalone farmers can utilize the cut kelp for abalone feed? However, this will be based on practicality; perhaps an option, that could be discussed with NC Abalone Working Group

This was considered and added as an option to Volume 2, Part B, Table (d) (ix) 1-1: Measures to rehabilitate the environment affected by the undertaking of any listed activity, Section: Surf Zone Related Mining Activities, Activity 3.

### Social Impact Assessment (SIA):

- It is indicated that the impacts on the aquaculture industry is not included in the Social Impact Assessment because it has been evaluated in a different Specialist Study, but the key findings of the Aquaculture Specialist Study *should* be included in the Social Impact Assessment because it is of a high social impact significance (sustainable aquaculture jobs vs. un-sustainable mining jobs). If only indicated in one of the many additional specialist studies this important impact may be missed.
- SIA Page ii: States that Hantam Local Municipality IDP is applicable. This is not correct, the activities will fall in the Kamiesberg Local Municipality, and therefore it is the Kamiesberg Local Municipality IDP that should be considered.
- SIA Page iii: It is stated that "A significant portion of the annual wage bill is and will be earned by HD members from the area and will be spent in local towns of the area", but I think it is important that it should be indicated more clearly how large this portion of the wage bill will be (in percentage or in actual numbers).
- SIA Page 31: The names of the district municipalities given on page 31 of the Social Impact Assessment (SIA) under paragraph 3.3 is out-dated.



impacts on the aquaculture study is included in Volume 4, Section 10.1, Sub-section 4.3.8 of the SIA report.

Namakwa District Municipality Integrated Development Plan Namakwa District Local Economic Development Plan were added in Volume 4, Section 10, page ii under the heading Policy and Planning fit of the SIA report.

The actual percentage of the annual wage bill has been specified Volume 4, Section 10,1 on pages ii and iii under the heading: Operational Phase Social Impacts, sub-heading: Employment, of the SIA report.

The names of the district municipalities were updated in Volume 4, Section 10.1, Sub-section 3.3 of the SIA report.

#### **Water Quality Records:**

- It indicates that water Quality Records will be recorded and send to ..... No indication whereto.

Elevated Nitrate levels will have a potential negative impact on crayfish operations. No mentioning

is made on what mitigating measures will be put in place.

No indicated in Volume 2, Part B, Table (d) (ix) 1-1: Measures to rehabilitate the environment affected by the undertaking of any listed activities, Section Surf Zone related impacts, Activity 4

As well as in Volume 2, Part B, Monitoring and Management, Section G, Reporting on Water Quality,

#### **Ground water study**

- It is good to see that a groundwater study has been included, and that measure to prevent contamination of ground water is included in EMPR (page 12). Contamination of ground water with additional salt should be prevented. Although the ground water in the area is not of good quality, it is still used to supply Koingnaas and Hondeklipbay with water. Groundwater will still be used and needed long after the life of mine, and should be protected at all cost.

"Contamination of groundwater with additional salt should be prevented"

This has been addressed by the recommendation that all waste containment facilities (including tailings dams) should be lined with impermeable material to prevent seepage into underlying groundwater resources and can be found in Volume 4, Section 6, Sub-section 11 of the Geohydrological report.

"Although groundwater in the area is not of good quality, it is still used to supply Koingnaas and Hondeklip bay"

As pointed out in the report, groundwater quality in the study area deteriorates from the north to the south. Water supply to Koingnaas and Hondeklipbay is sourced from the Somnaas Noup Aquifer located about 20 km north of Koingnaas, in an area with marginally good quality water. No mining activities with potential to contaminate groundwater are anticipated in this area and can be found in Volume 4, Section 6, Sub-section 4.5 of the Geohydrological report.