



PJ Theron

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Date: 22 February 2020

## **Comments on expansion of Kareerand TSF**

The letter from GCS dated 20 January 2020 in this regard refers.

Unfortunately, I couldn't get hold of the Scoping Report in the Potchefstroom library. Secondly the meeting schedule for engagement with stakeholders on 5 February 2020 was disrupted by member of the Kuma community, on which I decided to leave the meeting.

As I was involved in the original design of the TSF, I am quite aware of the concerned issue. In fact, I am also a member of the Forum liaising matters related to the impact on the environment with Interested and Affected parties (IAP). Unfortunately, I wasn't invited to the last 2 meetings. Even not 100% updated with what was discussed at the last meetings, I am aware of some of the constraints in operating the TSF. Thus, these constraints still being a concern are actually triggering some of the following comments.

So, without reading the Scoping Report, I want to submit the following.

1. Building a **huge mountain 122m high**, surely the **stability of the underlying formation** was researched as to ensure it could take the huge weight. Even if it was well researched, there is still a concern whether there are sufficient plans, to manage possible outcrops caused by the weight of the dam.
2. The purpose of the **underground drainage and the importance of functioning effectively need attention**, as I observed during a visit somewhere in 2019, that not all draining pipes are working. When looking at the photo showing the planned expansion, it seems the existing draining system/pipes would be affected. Taking all-in-all, it would be appreciated if a short description could be provided to explain the purpose of this draining system and how Mine Waste Solution and/or Anglo Gold Ashanti plans to ensure effective function of the system.
3. **Safety measures** are to prevent and or manage possible spilling of slimes. Also to be very honest in **reporting such spills to the affected parties**, such as land users using the water from the Vaal River downstream of the dam.
4. **Identifying any other risks** that might occur and updating all IAPs and ensure including it into the Environmental Management Plan of the TSF.
5. **Impact on underground water and the water in the Vaal River**. Surely, there is a risk of affecting the underground water and the water of the river. Although I attended quite a number of the Environmental Form, the outcome of reports was very seldom clearing covered in the minutes of meetings. Thus, the

suggestion is that summary reports of monitoring impacts on the environment, rather be sent on a regular basis the IA Parties, such as the Department of Agriculture and Agri NW.

6. Some people involved in obtaining comments for the original TSF, would remember that the **side slopes** were an important aspect in comments from the Department of Agriculture. Fortunately, the dam was design for such flatter slopes as the old dams. With expansion now being on the table, I would like to emphasize again the importance of ensuring constructing the dam with slopes as designed.
7. **Covering the dam with topsoil** during the operational phase is a concern from the original designing and construction phase. Unfortunately, the detailed calculations whether there would enough topsoil to cover the entire dam.
8. **End use of the dam** after decommissioning. People involved with the original design of the dam would remember, that the Department of Agriculture argued about the loss of agricultural land. Thus, emphasis was on improvement of rehabilitation in an attempt to restore the land – mountain – to land that could be used for agriculture again. Therefore, the designing the dam with low side slopes and covering it with topsoil was aimed at end-use rehabilitation. The assumption is that the expansion of the dam has still the very same end-use objectives in mind. As Agri NW would also like to see the end-use to be agriculture, calculations as where and how enough topsoil would be available, need to be clearing captured in the Scoping Report and at the end in the EMPlan.
9. **Size of TSF.** As the size of this TSF seems to be quite unique, there is a question whether there are similar dams somewhere in the world, in an attempt to learned lessons in designing, managing and operating such a dam.

Lastly, Agri NW would like to emphasise the importance of possible negative impacts on adjacent agriculture land, underground water and the water from the Vaal river. Secondly to be 100% honest and transparent in managing all aspects of the TSF.

Yours truly.

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PJ Theron. Soil Conservation Technician (1971)

## **Questions related to the expansion of the Kareerand TSF.**

1. Extensive pressure of slime material on underlying formations? Risk of outcropping and plans to deal with is?
2. Bottoms drains of existing dam not working as planned. How to deal with it when extending the dam?
3. What are the prevention plans to deal with significant spills?
4. What risks were identified during the 10 years' operational period?
5. Plans for monitoring, mitigating and reporting of water quality? Plans to sustain the Environmental Forum?
6. What plans are there to improve the management of dust, as it seems the current plans are not sufficient to prevent negative effects on adjacent vegetation and livelihood of people?
7. Sides slopes of the dam. Plans to deal with the problems experienced till date as to ensure maintaining workable slopes for successful and sustainable rehabilitation?
8. Covering the dam with topsoil. As covering the dam with topsoil is of utmost importance for a sustainable end use, there should be a very clear and trustable confirmation that there would be enough topsoil to cover at least all the side slopes. How does the Scoping Report provide for this?
9. End-use of the dam. Are their plans for building access roads as to reach the top of the dam when finalising the dam?
10. Similar TSFs in other parts of the world? Lessons to be learned?

Questions by PJ Theron on behalf of Agri NW.

1 September 2020.

**From:** Piet Theron  
**Sent:** Wed, 2 Sep 2020 11:28:39 +0200  
**To:** Anelle Lotter  
**Cc:** Lehlo Mashego  
**Subject:** RE: REGISTRATION FOR MEETING - 1 SEPTEMBER 2020: Expansion of Kareerand TSF - Draft Environmental Impact Report (DEIR) available for comment from 14 August 2020  
**Attachments:** Comments of expansion of Kareerand TSF.docx, Questions related to the expansion of the Kareerand TSF 1 Sept. 2020.docx, Questions related to the expansion of the Kareerand TSF 1 Sept. 2020.docx, Comments of expansion of Kareerand TSF.docx

Anelle,

My telephone conversation a few minutes ago refers.

Unfortunately I couldn't take part in yesterday's MS Teams meeting, due to unforeseen circumstances. As regards my questions and comment quite valuable and important I appreciate the opportunity to submit my question. Thus, hereby my questions, based on my comments I previously submitted. I also attach my previous comments having a little bit more detail than the questions.

Please let me know when and how would, to receive feedback on my comments and questions.

Regards,

Piet Theron Agri North West

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**From:** Anelle Lotter [mailto:anelle@gcs-sa.biz]  
**Sent:** 28 August 2020 01:04 PM  
**To:** Piet Theron <p.theron49@telkomsa.net>  
**Cc:** Lehlo Mashego <lehlo@gcs-sa.biz>  
**Subject:** RE: REGISTRATION FOR MEETING - 1 SEPTEMBER 2020: Expansion of Kareerand TSF - Draft Environmental Impact Report (DEIR) available for comment from 14 August 2020

Dear Mr Theron

Many thanks for your interest in this project.

Please find below the link to the afternoon session. The session will take place from 14:00 to 16:00 on Tuesday, 1 September 2020.

Kindly click on the *Join Microsoft Teams Meeting* below to join the webinar room.

Attached to this email the following:

- a) Agenda for the afternoon session
- b) Presentation to be delivered

Should you have any issues pertaining to the session, please contact:

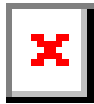
- Lehlogonolo - 076 837 5240
- Anelle - 082 804 5890

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### **Anelle Lotter** Stakeholder Engagement Specialist



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Johannesburg, South Africa

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**From:** Piet Theron <p.theron49@telkomsa.net>  
**Sent:** Monday, 24 August 2020 12:45  
**To:** Anelle Lotter <anelle@gcs-sa.biz>  
**Subject:** RE: REGISTRATION FOR MEETING - 1 SEPTEMBER 2020: Expansion of Kareerand TSF - Draft Environmental Impact Report (DEIR) available for comment from 14 August 2020

Anelle,  
Thank you for this information.

Could you please put me on the list for attending the meeting and assisting for registration.

Regards,

Piet Theron Agri NW

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**From:** Anelle Lotter [<mailto:anelle@gcs-sa.biz>]  
**Sent:** 23 August 2020 01:38 PM  
**To:** undisclosed-recipients:  
**Cc:** Lehlo Mashego <[lehlo@gcs-sa.biz](mailto:lehlo@gcs-sa.biz)>  
**Subject:** REGISTRATION FOR MEETING - 1 SEPTEMBER 2020: Expansion of Kareerand TSF - Draft Environmental Impact Report (DEIR) available for comment from 14 August 2020

Dear stakeholders

We would like to thank all for their participation thus far in the review of the DEIR which is available for comment until 14 September 2020. Please download a copy from: <https://gcs-sa.biz/documents/>

As mentioned to you in previous emails and an SMS sent on 12 August 2020, we are planning to conduct two electronic platform meetings to provide a summary of the contents of the Draft Environmental Impact Report.

The events are planned as follows:

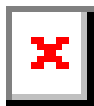
- a) Tuesday, 1 September from 10:00 to 12:00
- b) Tuesday, 1 September from 14:00 to 16:00

If you have not yet communicated to us your interest in participating in any one of the events (the events are similar), please just send us an email so that we may forward the link to the electronic meeting to you. **Registration to the meeting ends Friday, 28 August 2020 at 24:00.**

We are looking forward to your response to register for one of the meetings on 1 September 2020.

Kind regards  
Anelle Lötter

**Anelle Lotter**  
Stakeholder Engagement Specialist



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**From:** Anelle Lotter <[anelle@gcs-sa.biz](mailto:anelle@gcs-sa.biz)>

**Sent:** Friday, 07 August 2020 12:19

**To:** Anelle Lotter <[anelle@gcs-sa.biz](mailto:anelle@gcs-sa.biz)>; Lehlo Mashego <[lehlo@gcs-sa.biz](mailto:lehlo@gcs-sa.biz)>

**Subject:** Expansion of Kareerand TSF - Draft Environmental Impact Report (DEIR) available for comment from 14 August 2020

Dear Stakeholders

The Scoping Report for the expansion of the Kareerand Tailing Storage Facility which was submitted to the Department of Mineral Resources and Energy (DMRE) in February 2020 has been approved and the Draft Environmental Impact Report (DEIR) is available for review from 14 August to 14 September 2020.

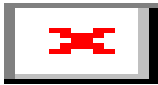
Please find attached a notification of the availability of the DEIR for your review and comment.

Also note that two webinar sessions are planned and you are invited to participate. A summary of the contents of the DEIR will be provided during the webinar sessions which are proposed to be held on Tuesday, 1 September during the morning and the afternoon – see attached letter for more information.

Please make use of the attached comment sheet to provide your comments on the DEIR on or before 14 September 2020.

Should you have any questions, please contact us.

Kind regards  
Anelle Lötter and Lehlogonolo Mashego



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**Addresses** [63 Wessel Road, Rivonia, Johannesburg, South Africa](#)

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**From:** Anelle Lotter <[anelle@gcs-sa.biz](mailto:anelle@gcs-sa.biz)>  
**Sent:** Thursday, 30 July 2020 23:22  
**Cc:** Anelle Lotter <[anelle@gcs-sa.biz](mailto:anelle@gcs-sa.biz)>  
**Subject:** Expansion of Kareerand TSF - Status and Progress

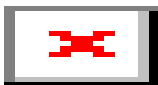
Dear stakeholders

We trust that this email finds you well.

Attached is a notification for your attention on the status and progress made with the applications relating to the proposed expansion of the Kareerand Tailing Storage Facility.

Should you have any questions, please contact us.

Kind regards  
Anelle Lötter



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