PROPOSED RIVIERA TUNGSTEN OPEN CAST MINING PROJECT: NEMA BASIC ASSESSMENT PROCESS: PUBLIC PARTICIPATION
TABLE 7: COMMENTS AND RESPONSES ON SCOPING REPORT AND PUBLIC MEETING (JULY 2009)

Please note that this table is a summary of the issues raised during the Public Participation phase and that comments have been grouped together where similar issues were raised. All the original written comments submitted by IAPs are included as an Appendix in the Basic Assessment Report.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.1. Impact of proposed Mining on Ecology and Biodiversity	1. Rare and threatened species of Fauna and Flora occur in the Moutonshoek Valley and Verlorenvlei RAMSAR Area. Refer to comprehensive studies done by Chittenden Nicks Partnership (1995) in conjunction with Weskus Streeksdiensteraad and Cape Province Administration. The entire Verlorenvlei valley's environment and ecosystem will be affected. Rare species of Fauna and Flora stand to be threatened. 2. By permitting mining in the catchment that feeds Verlorenvlei, as well as in the vicinity of the Krom Antonies River itself, will severely compromise these waters that are a breeding ground for a multitude of various flora and fauna. Some fauna and flora are already severely threatened in this area without needing any additional strain put on them by mining on their turf. Is Verlorenvlei not a recognised and protected environmental heritage site? How therefore can this mining operation even be contemplated? 3. The effect on the Verlorenvlei wetlands and estuary with specific reference to fauna and flora will need comprehensive study. There will be an impact on the vlei. The EIA must articulate the local importance and rarity of remnant vegetation and flora on and around the site, and whether any losses could be offset by search and rescue of key species as well as rehabilitation of like habitats within the general area.	1. Very little natural vegetation remains on the 550ha proposed for the mining lease area. However, it will be vitally important to assess the impacts of the mining on the Verlorenvlei system as a whole, especially the impacts on surface and underground water flow along the Krom Antonies River and into the Verlorenvlei system. Specialist studies in the EIA phase will determine the significance of such potential impacts. 2. The potential impacts on the surface and underground water systems of the Krom Antonies River and inflows to Verlorenvlei will be assessed by hydrological, hydrogeological, vegetation and freshwater ecological studies. Desktop studies have already been undertaken to understand how these systems work from biophysical points of view. These studies need to continue to obtain a high degree of certainty on how these systems function and their level of integration before any conclusions can be drawn regarding the potential impacts. 3. Specialist studies on fauna and flora will be done in the EIA phase. All impacts will be assessed and possible mitigation measures will be included in the Environmental Management Programme.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.1. Impact of proposed Mining on Ecology and Biodiversity… (Continued)	4. The mine seems to be located in degraded veld and associated with remnants of Swartland Shale Renosterveld (Critically Endangered) and Leipoldtville Sand Fynbos (Endangered). The three major rivers in the Northen Sandveld –Verlorenvlei, Langvlei, Jakkals – have been demonstrated to be floristically unique. Their floras are distinct with species assemblages recorded from these systems found nowhere else. Coupled with this is the presence of a new and likely endemic *Psoralea* sp. This and allied species are found on fresh water seeps throughout the area but have been heavily impacted by over –abstraction of ground water as well as salination of fresh water. This process is most evident in the upper Wadrift fresh water seeps on the Langvlei River. As fresh water becomes artificially more brackish, so species richness drops and freshwater species are replaced by brack loving taxa. All ecological and relevant studies should consult the Sandveld Preliminary Reserve Determination (2002) (DWAF report 2002 by GEOSS, Southern Waters and Coastec) 5. It is likely that the areas in question support Leipoldtville Sand Fynbos and Swartland Shale Renosterveld, both of which are threatened vegetation types. According to the National Spatial Biodiversity Assessment (2004) they are listed as endangered and critically endangered respectably. Further threats to critically endangered habitat types are unacceptable. 6. Verlorenvlei and the Mouton's Hoek valley provide important habitat for numerous avifauna, invertebrate, mammal (inc the endangered Cape Leopard) plant and fish species, including the critically endangered, *Cape galaxias* (Verlorenvlei redfin). In terms of the Biodiversity Act it is our duty to protect SA's precious biodiversity. Specialist mammal, invertebrate, avifauna, reptile, amphibian and botanical assessments are call for, and it is essential that these reports address on site impacts as well as potential downstream impacts.	4. Noted. See 1.1.1 and 1.1.3 above. 5. Noted. See 1.1.1 and 1.1.3 above. 6. Noted. See 1.1.1 to 1.1.3 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.1. Impact of proposed Mining on Ecology and Biodiversity (Continued)	7. The area which would be directly impacted by the mining activities has largely been transformed by agricultural activities. However, there are still important fragments of indigenous vegetation, including • Leipoldtville Sand Fynbos, which is classified as endangered, • Swartland Shale Renosterveld, which is classified as critically endangered, • Piketberg Quartz Succulent Shrubland, which should be classified as endangered because of the extremely small area it covers, • Piketberg Sandstone Fynbos, • Cape Lowland Alluvial Vegetation, which is also classified as critically endangered, and • Cape Lowland Freshwater Wetlands. CapeNature does not support any further loss of any endangered or critically endangered vegetation types. The CAPE fine-scale planning process has also classified terrestrial and aquatic Critical Biodiversity Areas (CBAs) within and adjacent to the application area. These CBAs must be taken into consideration in any further specialist studies.	7. Noted. See 1.1.1 to 1.1.3 above

	KEY ISSUES	IAP COMMENT	WEC RESPONSE

RESPONDING IAPS:

1. K. Louw (29 April 2009); IAPs (30 April 2009); Verlorenvallei Coalition (June 2009); K&A (1 June 2009), HG van Zyl (1 June 2009); DJ Smit (1 June 2009); E. Swanepoel; J. Swanepoel; D. Swanepoel; G. Snyders; M. Jafta; J. Snyders; K. Taylor; L. Bosman; A. Lamont; S. Karolis (9 May 2009); B. Low (1 June 2009) **;** J. Nichols (21 April 2009); IAPs (30 April 2009); J. Daniels; K. Swarts; G. Engelbrecht; E. van der Westhuizen; P. van der Westhuizen; R. Swarts; B. Goedeman; S. Lof; L. Enodada; C. De Wet; M. Swanepoel; C. Jacobs; W. Jafta; D. Mhlophe; J. van Wyk; J. Jacobs; C. van Wyk (11 May 2009); M. von Hoogstraten (1 June 2009); D. Simons (20 May 2009); C. Williams (20 May 2009); S. Hunter (1 June 2009); C. Lancellas & C. Barvir (22 May 2009); S. Jeffery (22 May 2009); G. Wessmann (23 May 2009); B. Boshier (3 May 2009); T & T Vanderhaeghen (26 May 2009); PJ Pieters, GS Thomas, MT Johnson, R Cox, C Gradidge, PJE Strauss, JE Paton, RC Cloete (24 May 2009); E Krause (21 May 2009); S & S Lennard ; D&N Lennard (1 June 2009); L & K Smith (1 June 2009); E Loubser (29 May 2009); A Ashwell (25 May 2009) Endangered Wildlife Trust; Krom Antoniesrivier Watergebruikersvereniging – J Smit (31 May 2009); Mouton's Valley Pty Ltd - EW Starke (25 May 2009); EBEDAG (1 June 2009); Schapenberg Sir Lowry's Conservancy -D Marais (25 May 2009); A van Zyl (18 June 2009); J van der Merwe (June 2009)
2. Mr D. Roniger (April 2009); IAP (30 April 2009); S. Hunter (1 June 2009); E. Swanepoel; J. Swanepoel; D. Swanepoel; G. Snyders; M. Jafta; J. Snyders; K. Taylor; L. Bosman; A. Lamont; S. Karolis (9 May 2009); B. Low (1 June 2009) ; L. Pieters (29 May 2009); G. Clark (24 May 2009); M Burger (29 May 2009); L & K Smith (1 June 2009); J Laubscher (29 May 2009); A Ashwell (25 may 2009); Mouton's Valley Pty Ltd - EW Starke (25 May 2009) EBEDAG (1 June 2009); G van der Merwe (17 June 2009)
3. Mr AR Schnetler (28 April and 19 May 2009); IAPs (30 April 2009); J. Daniels; K. Swarts; G. Engelbrecht; E. van der Westhuizen; P. van der Westhuizen; R. Swarts; B. Goedeman; S. Lof; L. Enodada; C. De Wet; M. Swanepoel; C. Jacobs; W. Jafta; D. Mhlophe; J. van Wyk; J. Jacobs; C. van Wyk (11 May 2009); C. Alexander (2 June 2009); B. Low (1 June 2009); L. Pieters (29 May 2009); DEA&DP (8 July 2009)
4. B. Low (1 June 2009)
5. WESSA (1 June 2009)
6. WESSA (1 June 2009);
7. CAPE NATURE (18 May 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.2 Impact of Proposed Mining on Water Resources of Verlorenvlei and surrounds	1. The most overwhelming issue is that of the hydrological affect on Verlorenvlei and the reduction in inflow from the Krom Antonies River. There is no mitigation that could eliminate this effect on a RAMSAR site and one of South Africa's most important wetlands. 2. The potential impact of the mine on water resources – groundwater, surface water and coastal waters – is of extreme concern. Water is a very real issue, where there is a nationally recognised shortage, especially in this particular valley. Drawing water from rivers from afar (the Berg and Olifants Rivers) and Verlorenvlei's own Krom Antonies River is totally unsustainable. The impact could possibly be felt in distant places (i.e. Potatoes in the Sandveld or spring flowers in Namakwaland). The water emanating from the Krom Antonies River catchment is of high quality and also water stressed. Pollution of all sorts (water, air, noise) will undoubtedly have consequences in times to come. Most businesses, farms and residents in the Verlorenvlei rely on ground and surface water resources, which are at serious risk of pollution by the mine. 3. Surface water flows in the Verlorenvlei catchment tend to be primarily limited to event-driven, short-duration episodes, and groundwater plays a strong role in maintaining the Kruis River/Verlorenvlei river system. Malan and Day note that extensive lengths of the rivers in this arid area are characterised by hyporheic (i.e. subsurface) flow from a multitude of intersecting groundwater outflows (springs and seeps). This alludes to the importance of the ground water flows. Extensive dewatering of the excavated pit would be required through the mining operation, with water stemming from both the primary (surface) aquifer and from faults running through the underlying rock layers (Appendix 5, p. 20).	1. Refer to 1.1.1 to 1.1.3 above. It is vital for the success of the EIA that access to the farms within Krom Antonies Valley is obtained to be able to undertake the required detailed specialist studies listed in 1.1.2 above. The brief of the specialists mentioned above and for the mine engineers will be to recommend various mitigation measures for preventing or at least reducing the significance of the potential impacts on the integrated Verlorenvlei system. 2. Freshwater inflows into the rivers systems of Verlorenvlei are not only vitally important for the ecology of the vlei but obviously also for the farmers within this catchment who rely on water from the rivers and groundwater for irrigation. It is highly unlikely that water from the Berg and Olifants Rivers will be required for the proposed mining operation. The proposed studies mentioned in 1.1.2 need to be undertaken to assess the impacts of mining on the river and ecosystems associated with the applicable catchment of Verlorenvlei. 3. The proposed integrated specialist studies (hydrology, hydrogeology, botany and freshwater ecology, together with the geotechnical and mine engineers) should be able to assess the biophysical environment to obtain a better understanding to in turn assess the significance of the potential impacts and proposed mitigation and reduce the significance of such potential impacts.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.2 Impact of Proposed Mining on Water Resources of Verlorenvlei and surrounds (Continued)	This suggests that the pit will intercept, and attract, water from the aquifers. Dr L Day (Appendix 5, p. 23) suggests that sealants or linings to be used to prevent inflows into the pit, or that cut-off trenches are used to divert groundwater flows into existing stream systems. Neither option is in our view practically possible. Whilst cut off drains may in places be able to intercept the surface alluvial aquifer, it could not do so for the deeper confined or semiconfined aquifers. 4. Will a Reserve Determination be made for the required water flow in the Krom Antonies River, i.e. is there any more water that can be extracted from the River for use in the mine without affecting the River and ultimately the Verlorenvlei. 5. The DSR provides no information on the estimated volume of water that the mine would use in this extremely water-sensitive geographical area. How much surface and ground water would be abstracted? 6. The Government sponsored Working for Wetlands programme has been active in the Verlorenvlei area doing wetland rehabilitation work for years. All this work will be destroyed by the proposed mining activities and will have detrimental effects on all activities and ecosystems downstream. This investment of tax payer's money into a worthy combination of environmental rehabilitation and job creation could be seriously compromised by threats to the water quality and quantity as noted in the Scoping Report under "constraints" pg iii) "drainage to the sensitive Verlorenvlei estuary" . We call for the environmental constants to constructively engage with Working for Wetlands about this issue and make the findings of this process available to other I&AP's.	4. Specialist ground and surface water studies will be undertaken during the EIA phase. Whilst a Reserve Determination of the Krom Antonies may not be possible the specialist scientists should be able to assess the significance of the potential impacts. 5. The amount of water to be used by the mine and minerals processing is determined to be: mining ±100m^3 (dust suppressants) and 3500m^3 minerals processing: The source of water will be groundwater (dewatering). It should be noted that 70% of the water used in the minerals processing could be recycled. 6. Specialist ground and surface water studies to assess the impacts of the proposed mine will be done in the EIA. The EIA will be made available to IAPs for comment in due course.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.2 Impact of Proposed Mining on Water Resources of Verlorenvlei and surrounds (Continued)	7. We question the use of water for mining activities in an area that is already known to be extremely water stressed. We have called for comment from the Department of Water Affairs and Forestry on current and future availability of water in the area. We call for a specialist report by a geohydrologist that specifically addresses the issue of availability of water in the catchment area and the potential impact of abstraction of water for the proposed mine on other water users. We call for reference to the concept of the ecological reserve as upheld in the National Water Act. 8. Potential impacts identified by Dr Day are of serious concern to DWAF as it can have a negative impact on the water resource. DWAF is interested to know what the present ecological state and classification of the river is and how the mining activity will impact on the present state. 9. The risk of pollution in the catchment area of the Verlorenvlei due to the hazardous substances involved in the processing of the mineral and the importance of the Verlorenvlei itself as a Ramsar site must therefore mean that there cannot be any reason to allow such a development to take place. Statements by the mining company that they will prevent this pollution of the groundwater from taking place must be measured by the well documented cyanide poisoning of ground waters that occurs around the gold mines of the North West province as well as the acidification of the groundwater and wetlands surrounding the Mpumalanga coal mines shows that legislation and so called mitigation procedures as proposed by Bongani minerals simply do not work as there is no monitoring or enforcement of legislation by the authorities. 10. Reference was made to the “perennial Krom Antonies River”. 2009 was the first in decades that this river flowed through the summer which is hardly perennial!	7. A geohydrological study will be done in the EIA. DWAF will also be asked to supply comment on the EIA. The necessary applications will be made to DWAF in terms of the National Water Act. 8. The present state of the river and possible impacts will be assessed in the EIA. 9. The potential risks of polluting the Krom Antonies River will be undertaken by specialist studies. If it is possible to mitigate such risks totally, then mining and processing could be considered. If the anticipated risks of pollution remain high dispute mitigation mining may not take place. Please note that the cyanide is used in gold processing and not in tungsten processing. Similarly the acidification of groundwater by coal mines is very different to tungsten mining. Monitoring and enforcement is tightly controlled by DME in terms of the EMPR. 10. The report will be amended.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.2 Impact of Proposed Mining on Water Resources of Verlorenvlei and surrounds (Continued)	11. Another aspect which does not influence us directly, but impacts on the Verlorenvlei, is the impact of extracting water from the Krom Antonies River (or subsurface water) to mitigate the problem which dust from the overburden heaps presents. This water would surely not run-off into the system again as most will evaporate. The volume of water necessary to keep these overburden dumps moist and preventing dust storms in summer should be measured and this reduction in flow into the Verlorenvlei measured 12. All the drinking water for Redelinghuys is supplied from the fountain on Matroozefontein. This amounts to 31 liters/second (977,616 cubic m's/annum). Any changes to the quality and availability of the water from the fountain will have serious health, welfare and development implications for the town. It needs to be pointed out that this residential water qualifies as a priority one supply. 13. The ''predictive zones of influence'' for the draw down of groundwater by the ''pits'' (as shown in the SRK report) seem more appropriate to a homogenous material. What will be intersected are at least two aquifers, the one being at the highly fractured contact zone with the granite pluton. The presence of at least two fault lines further complicates predictions regarding groundwater flow and potential interference with the current water distribution within the Verlorenvlei valley.	11. See 1.1.1 to 1.2.7 above. 12. Refer 1.2.1 above. 13. Refer to 1.2.3 above. Please note that the modelling undertaken did take the two aquifers into account. The model will be refined once drilling and pump testing of boreholes is carried out during the EIA phase of the project.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.2 Impact of Proposed Mining on Water Resources of Verlorenvlei and surrounds (Continued)	14. The Report indicates that the proposed prospecting activities will result in a pit depth of approx 200m, with the first ore being at approx 60m. This Department of Agriculture is concerned for the aquifers in the proposed area of activity lie 10 – 30m below the surface. It is also clear that this could lead to the accumulation of surface water which could potentially become contaminated enroute to the aquifer leading contamination of the aquifers in the Valley and, most landowners make use of the groundwater for domestic and livestock watering purposes, and some for crop production. Contamination of the groundwater would rob the Agricultural landowners of their right to make a living. This Office feels justifies in requesting a more focused Specialist Study on the Impact of the Proposed Activity on the Groundwater Supply and Quality. 15. If the aquifer is assumed to be initially in equilibrium how can I be sure that blasting will not disturb the underlying geological formations where the aquifers lie?	14. Refer to 1.2.1-1.2.9 above. Detailed hydrologist impact assessment will be undertaken, which includes the drilling of a number of shallow and deep boreholes, the testing of the chemistry of the groundwater and the volumes that can be pumped. In addition a geotechnical assessment will be undertaken to determine the potential weathering of the host rock and the possibility of contaminating the surrounding groundwater, especially during dewatering. 12. Refer to 1.2.1 – 1.2.9 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Responding IAPs: 1. Prof W Van Riet & S Prinsloo (April 2009); J. von Zeuner (20 May 2009); Mr & Mrs S. Josephs (25 May 2009); DJ. Smit (1 June 2009); J. Nichols (21 April 2009); IAPs (30 April 2009); Verlorenvallei Coalition (1 June 2009) ; J. Daniels; K. Swarts; G. Engelbrecht; E. van der Westhuizen; P. van der Westhuizen; R. Swarts; B. Goedeman; S. Lof; L. Enodada; C. De Wet; M. Swanepoel; C. Jacobs; W. Jafta; D. Mhlophe; J. van Wyk; J. Jacobs; C. van Wyk (11 May 2009); M. Groenewald (1 June 2009); D. Simons (20 May 2009); C. Alexander (2 June 2009); S. Hunter (1 June 2009); J. Tredoux (20 May 2009); AM Coetzee (31 May 2009); WESSA (1 June 2009); S. Jeffery (22 May 2009); S. van der Merwe (25 May 2009); G. Clark (24 May 2009); J & M Reed (24 May 2009) ; RV Duncan (15 May 2009); M. Nicol & J. Gallimore (20 May 2009); T & T Vanderhaeghen (26 May 2009); PJ Pieters; GS Thomas; MT Johnson; R Cox; C Gradidge; PJE Strauss; JE Paton; RC Cloete (24 My 2009); H. Visser; F. Visser, D Visser (26 May 2009); IC Kotze (24 May 2009); P&J Groenhof (25 May 2009); M Pienaar (30 May 2009); M Lewarne (25 May 2009); Schapenberg Sir Lowry's Conservancy -D Marais (25 May 2009); B Clark (25 May 2009); A Ashwell (25 May 2009); V Strydom (24 May 2009); S Fazel- Ellahi (25 May 2009); K Paulse (25 May 2009); A Smith (1 June 2009); R Stewart (24 May 2009); R McGuffog (21 May 2009); Somerset West Bird Club – J Carter (14 May,17 June 2009) 2. Verlorenvallei Coalition (1 June 2009); W. Fourie (2 June 2009); MJ Kellerman (3 June 2009); PJ Pieters; GS Thomas; MT Johnson; R Cox; C Gradidge; PJE Strauss; JE Paton; RC Cloete (24 My 2009); M&J Thomson (28 May 2009); J Anderson (31 May 2009); F vd Merwe Coetzee (29 May 2009); M Burger (29 May 2009); B Boshier (3 May 2009); M Pienaar (30 May 2009); M Lewarne (25 May 2009); Schapenberg Sir Lowry's Conservancy -D Marais (25 May 2009) ; B Clark (25 May 2009); A Ashwell (25 May 2009); V Strydom (24 May 2009); S Fazel- Ellahi (25 May 2009); K Paulse (25 May 2009); A Smith (1 June 2009); R Stewart (24 May 2009); M&C Loewenthal (27 May 2009); O Curtis (21 May 2009); Krom Antoniesrivier Watergebruikersvereniging – J Smit (31 May 2009); J Louw (25 May 2009); Verlorenvlei Fragrant Products (20 May 2009); A van Zyl (18 June 2009); Potatoes South Africa- Dr BJ Pieterse (31 May 2009); Banghoek Private Nature Reserve (20 May 2009); J van der Merwe (June 2009) Philippa Huntly (30 April 2009) 4. F.Strange (23 May 2009); Verlorenvallei Coalition (1 June 2009) ; Eendekuil BV (1 June 2009) 5. Various IAP's 6. WESSA (1 June 2009); CAPE NATURE (18 May 2009); H Nieuwoudt (25 May 2009); DEA&DP (8 July 2009) 7. WESSA (1 June 2009) 8. DWAF (5 June 2009) 9. Eagles Pride Farm (P&A Langton), Piket Bo Berg Inwoners Vereening (D Eigelaar), Achtervlei (K&E Eigelaar) – 27 May 2009 10 Namaquasfontein Boerdery trust, Kromantoniesrivier Bewarea (1 June 2009) 11 G Niewoudt (25 May 2009) 12 Unifrutti matroozefontein (6 May 2009) 13. Verlorenvlei Fragrant Products CC (20 May 2009) 14. Department of Agriculture Western Cape (4 June 2009) 15. F Strange (23 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.3 Impact of polluted groundwater	1. Should groundwater be polluted by the mine, it would have catastrophic consequences for those who rely on groundwater for both drinking water and irrigation (a substantial amount of irrigation in the Verlorenvallei is supplied by groundwater. Water supplied by the Redelinghuys Municipality is derived from an artesian well in a valley above Matroozefontein just outside Redelinghuys at a rate of 31 litres/second (977,616 m^3/annum). This presumably emanates from the semi-confined aquifer through which the pit will be excavated. Any changes to the quality and availability of the water from the fountain will have serious health, welfare and development implications for the town. 2. What could the impact of continuous blasting in the Moutonshoek Valley have on the underlying strata and thus groundwater flows? If the behaviour of groundwater is still an uncertain science how can anyone really be sure? The 1969 earthquake in Tulbagh shut down 13 fresh water ''fonteine'' around the Verlorenvlei. 3. Given the vagaries of groundwater systems surely the study should extend to Elands Bay at the very least? Could the IAP be assured that the groundwater systems feeding the Verlorenvlei will not be compromised? 4. Any mining which will negatively and irreversibly impact groundwater depth and quality – and therefore the extent, quality and ecological functioning of streams and wetlands in the area – should not be permitted as should any further impacts on the Krom Antonies and Verlorenvlei Rivers.	1. Specialist ground and surface water studies will be done in the EIA phase to identify, assess and rate possible impacts as well as suggest possible mitigations. 2. See 1.3.1 above. Blasting will hardly cause earthquakes. 3. See 1.3.1 above. 4. We agree with this sentiment and hence for the specialist studies that need to be undertaken to either prove such impacts or disprove them.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.3 Impact of polluted groundwater (Continued)	5. Para 5.1.8.6, points out that "contamination of the soil and groundwater by accidental spills of chemicals, fuel, oil and/or grease must be kept to a minimum by applying a good "housekeeping" approach. The IAP simply does not have the confidence that Bongani Minerals (Pty) Ltd have the moral fibre or the will to ensure that NO accidents occur and that the waste tailings will be maintained for the entire life of the mine. I also simply do not have the confidence that the stipulated processes will be implemented with the greatest speed and enforced with the greatest capacity in order to avoid contamination of the soil and water. 6. As stressed in the Scoping Report of April 2009, the "mining of the mineral resource could cause pollution not only of surface water resources but also groundwater resources". Pollution of the Krom Antonies River and the groundwater of the area is a huge concern for human health, biodiversity and agriculture of both the immediate area of the Mouton's Hoek Valley and downstream users. Given that many residents are dependent on wells and boreholes for their drinking water, the IAP calls for input from appropriate specialists within the medical fraternity on potential impacts on human health. 7. The alarming problem is that Groundwater pollution also occurs on different timescales than surface water contamination. Flow rates vary widely and can be as slow as two miles a year. Because of this, non point source pollution can take years or even decades to appear in wells and just as long or even longer to dissipate or be converted. lt could take ten years from Het Kruis to pollute Verlorenvlei-2 miles per year. Groundwater pollutants can enter the body directly through water supplies or by eating foods prepared with contaminated groundwater or grown in fields using contaminated sources, it may also affect humans when they are in direct contact with polluted waters.	5. All mines must have SHE personnel appointed. The SHE offices must report all incidents of pollution, spills etc. All pollution incidents must be cleaned up according to the EMPR. Other monitoring and auditing tools will be in place to ensure that such pollution is noted and cleaned up. Such incidents are also controlled by a number of Acts (eg. NEMA, Minerals Act, National Waste Act). 6. See 1.3.1 above. 7. See 1.3.1 above. The existing hydrogeological model of groundwater and the subsurface geology created by SRK will be assessed and refined in accordance with actual drilling results, groundwater pumping and geotechnical studies.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.3 Impact of polluted groundwater (Continued)	This could mean that all the potatoes, fruit, etc could be contaminated in the Verlorenvlei valley which uses ground water to irrigate its lands. As you are aware the mine is going to be situated on the Krom Antonies River which feeds the Verlorenvlei water catchment area.	
Responding IAPS: **1**. Verlorenvallei Coalition (June 2009); 24 May 2009: J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers (24 May 2009); M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009); Eendekuil BV (1 June 2009); C. Alexander (2 June 2009) ; S. Hunter (1 June 2009); AM Coetzee (31 May 2009); G. Clark (24 May 2009); T & T Vanderhaeghen (26 May 2009); B Anderson (1 June 2009); M&K de la Rue (29 May 2009); F van der Merwe Coetzee (29 May 2009); C &M Loewenthal (27 May 2009) **2**. F. Strange (23 May 2009) **3**. F. Strange (23 May 2009) **4**. B. Low (1 June 2009); E Loubser (29 May 2009); D Stevens (31 May 2009); Krom Antoniesriver Watergebruikersvereniging – J Smit (31 May 2009) **5**. L. Pieters (29 May 2009) ; N Taylor (25 May 2009) **6**. WESSA (1 June 2009); M Burger (29 May 2009); B Anderson (1 June 2009); Potatoes South Africa – Dr BJ Pieterse (31 May 2009) **7**. E. Krause (25 May 2009)		
1. Biophysical Environment	1.4 Impact of proposed mine on surface water salinities	1. The Coalition would like to clarify any suggestion that current irrigation is affecting the salinity in the Krom Antonies River. Irrigation backflow would add nitrates; yet the DSR reports that nitrate levels were insignificant. The salinity lower down in the river is due to the salinity of the soils that the river flows through. 2. Precisely what changes in salinity, pH, nutrient loading and concentrations of heavy metals are envisaged? 3. On page 18 par. 1, it is implied that irrigation return flow adds to the salinity of the river. This is not the case. Return flow in areas with bad agricultural/irrigation return flow would be a problem. We do not have this problem. We are also surprised that JN Rossouw states that water quality measurement is poor. How does he know that?	1. The salinities of the river will be assessed over at least one year's assessment of data collection. Should mining go ahead, longer term monitoring data will be collected. Conclusions will be drawn from such results. 2. A specialist surface and ground water study will be undertaken in the EIA phase. Any pollutants from the ore body will be assessed before any mining takes place. The chemistry of the slimes dams and soil and rock stockpiles will also be determined. Geotechnical and geochemistry tests will be undertaken of the core to be drilled during the EIA Phase. All results will be assessed to determine potential pollution. 3. See 1.4.1 above

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Responding IAPS: 1. Verlorenvallei Coalition (1 June 2009); H&T Paine (7 May 2009) 2. F. Strange (23 May 2009) 3. Namaquasfontein Boerdery Trust (1 June 2009); Kromantoniesrivier Bewarea (1 June 2009)			
1. Biophysical Environment	1.5 Impact of the proposed mine on river diversion	1. On page iii of the DSR, the risks of diversion "of even minor tributaries of the Krom Antonies River, resulting in increased downstream velocities, loss of ecosystem processes that are considered beneficial in terms of water quality amelioration or management of sedimentation and/or erosion" are listed as a "constraint". On page 36 of the DSR, the following is stated: "*Mining activities may also have HIGH impacts on riparian vegetation should the course of the Krom Antonies River or its smaller tributaries be changed.*" Despite this, on page ii of the DSR, "whether to construct a river diversion for the opencast mining operations" is listed as a design alternative being considered by Bongani Minerals Pty Ltd and their appointed consulting engineers. 2. The diversion of water will affect farming practices downstream of the proposed mine site, as this will reduce the water available to sustain farming in these areas. This will further exacerbate the loss of jobs and economic input into towns as far afield as Lamberts Bay and Vredendal.	1. The significant impacts of river diversion need to be carefully assessed by the specialist consultants. All alternative options also need to be assessed by the specialist consultants. All mitigation also needs to be assessed. Once all the results of the assessments are known, the Alternative with the least significant impacts will be chosen. 2. See 1.4.1 and 1.5.1 above
Responding IAPS: **1.** Verlorenvallei Coalition (1 June 2009); D. Simons (20 May 2009); AM Coetzee (31 May 2009) **2.** AM Coetzee (31 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.6 Current water use and impacts on water quality	1. As a result of the non-compliance with Regulation 49(1)(d), no effort was made in the DSR to describe current water use in the affected area in any detail. Such information is available, inter alia, from the Kromantonies Water Users' Association (KWUA), a registered water users' association under the National Water Act, 1998. 2. The proposed mine poses a serious threat to the water quality in the area, in particular the sensitive wetland area. 3. If the process of mining both tungsten and molybdenum produces toxins how can the tailing dams fail to be toxic also? 4. We live in a winter rainfall area where the surrounding mountains soak up the rain and release it slowly through springs over the following summer. Farmers pump water from this renewable store of water to irrigate their trees during the summer months. The effect of blasting as well as the removal and placement of millions of tons of rocks into waste heap will cause an increase in the stresses of the bedrock and this may cause the surrounding rock to fracture which may affect the storage capacity of the mountain. This will have a direct affect on the amount farmers can irrigate. Any decrease in the amount farmers can irrigate will have a major impact on sustainability. A decrease in the amount of stored water will also decrease the amount of springs that are located on the mountain. Piketberg has some rare flowers such as *gladiolus insolens* which is associated with patches that are wet all year round. This rare plant is found only on Zebraskop and the Lavant in the Piketberg range above Moutonshoek, nowhere else in the world, and any decrease in water will threaten its existence.	1. A hydrocensus of the Krom Antonies River valley is to be undertaken by SRK. The hydrocensus will gather all such information to be used in the specialist hydro geological and hydrological assessment. 2. See section 1.3 and 1.4 above. 3. See section 1.3 and 1.4 above. 4. See section 1.1, 1.2 and 1.3 above. The preliminary model created by SRK indicates that there should be no impact on the Table Mountain aquifer on Bo-Piketberg. This model will be refined once the detailed hydro geological study is undertaken.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.6 Current water use and impacts on water quality (continued)	5. There will be a need to de-water and from the graphics, the zone of influence has been modelled on a large scale. This de-watering will impact on the inflow of groundwater into the river, the base flow, especially in the dry summer months. This will lead to flow reductions in the river and associated water quality issues. There may be an increase in salinity as a result of less dilution by fresh groundwater in-flow. We place on record that the hydro geological section of the DSR was completed by a Mr Des Visser who is not a specialist hydro geologist.	5. See sections 1.2, 1.3, 1.4 and 1.6 above. Mr Des Visser has been practicing as a hydro geologist for the past 21 years. Note also that Mr. Visser is but one specialist who compiled the SRK preliminary report.

Responding IAPs:

1. Verlorenvallei Coalition (June 2009)

2. J. von Zeuner (20 May 2009); J. Daniels; K. Swarts; G. Engelbrecht; E. van der Westhuizen; P. van der Westhuizen; R. Swarts; B. Goedeman; S. Lof; L. Enodada; C. De Wet; M. Swanepoel; C. Jacobs; W. Jafta; D. Mhlophe; J. van Wyk; J. Jacobs; C. van Wyk (11 May 2009); Eendekuil BV (1 June 2009); R&T Priestley (20 May 2009); S. Hunter (1 June 2009); RV Duncan 15 May 2009); T & T vanderhaeghen (26 May 2009) ; DEA&DP (8 July 2009)

3. F.Strange (23 May 2009)

4. Eagles Pride Farm (P&A Langton), Piket Bo Berg Inwoners Vereening (D Eigelaar), Achtervlei (K&E Eigelaar) – 27 May 2009

5. EBEDAG (1 June 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.7 Impact of the Proposed Mining on Agricultural Land	1. The location for the proposed mine is at the epicentre of a profitable farming area which contributes to the local, provincial and national economy and which provides hundreds of permanent and seasonal jobs for farm workers. Products include grapes, citrus, potatoes, rooibos, buchu, lavender, beef cattle, sheep, racehorses, wheat, rye, lucerne, teff and oats. We must retain and have more secure local sources of food particular in view of the threats posed by climate change and the current global financial crises. Significant productive capacity will be lost as a result of the mine, and the remaining capacity is likely to be significantly affected by the mine. The DSR contains no assessment of current agricultural production by the affected area (again because of non-compliance with Regulation 49(d)) 2. It is stated that –''agricultural activities could theoretically be re-established after the cessation of mining''. Is ''theoretically'' really going to be good enough? Is there an open cast mine anywhere in the world where this has been achieved? Can I receive evidence of such a site? 3. The Global Community, and especially Africa, is in continues struggle to ensure food security. The imminent effects of Climate Change will only exacerbate this problem. The loss of any productive agricultural properties (areas directly affected by the proposed mine site as well as those indirectly affected due to impact of mining activities) is therefore unacceptable. 4. South Africa already has a major food security problem and to set precedents around mining on existing farms could escalate our food shortages to pandemic proportions. The overall effect that many such mines could have on South Africa food supply and the overall economic condition of the market is tremendously concerning.	1. The physical and economic impacts of the proposed mining operation on agriculture will be assessed during the EIA before any conclusions can be drawn as to the significance of the impacts of mining on agriculture. 2. Not all of the 550 ha will necessarily be lost to agriculture. The agricultural soils specialist and agricultural economist will determine the potential land use for sections of the 550 ha that will not be disturbed. 3. See 1.7.1 above. Other land uses can also be considered on the 550ha mine area that could generate an income. 4. The loss of 550ha of mostly dry land agriculture will hardly cause a significant food security problem in S.A. The agricultural economist will quantify the significance of removing 550ha out of agricultural production.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.7 Impact of the Proposed Mining on Agricultural Land (Continued)	5. As noted in the Scoping Report pg ii) a large area of arable land and a number of farming livelihoods would be affected should the mine be permitted". The land in the Mouton's Hoek is arable and support viable farms. We object to its potential loss due to mining, particularly in the light of the threats posed by climate change and the current global economic crisis which highlights the need for secure local sources of food. 6. More than half our crops are irrigated with underground water. Pumping water from a 200m deep hole will dry out the area around the mine. Underground water from the mountain will make its way down to replenish the dry area. This flow will be made worse by blasting without enough water farms in our area will close down. 7. In terms of section 6.3.1 of the Scoping Report "*agriculture... could thus theoretically be re-established after the cessation of mining*". From past experience with opencast mining in Mpumalanga, we have seen that a rehabilitated piece of land only yielded 2.6 tons/ha maize compared to a neighbouring piece of land that yielded 8 tons/ha in a particular season. We realize that different crops (such as potatoes) are produced, but the loss in production value of the soils will most probably follow the same pattern.	5. See 1.7.1 and 1.7.4 above. 6. See sections 1.2, 1.3 and 1.6 above. 7. See sections 1.1, 1.2 and 1.3 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.7 Impact of the Proposed Mining on Agricultural Land (Continued)	8. The Department of Agriculture is very concerned about the impact of eventual possible mining activities which would impact on the existing agricultural activities in what is considered to be a highly productive valley, able to sustain a rich & diverse variety of agricultural practices. The Department of Agriculture request a fully comprehensive & independent Specialist Study to determine the Agricultural Potential of the land before any prospecting right be awarded, and more specifically, the potential loss of agricultural land should mining activities begin: • Conduct a comprehensive soil classification & soil potential study; • Review the relationship between the soil study and the extent and potential of the present Agricultural activities on the land; • Assess the loss of land to agriculture that the proposed activities would create, including estimated losses to (estimated/potential) mining activities; • Assess the potential financial loss to agriculture (and individual landowners, in particular) should the proposed activities lead to the establishment of a mine; • Review mitigation measures for all of the above circumstances, including the possibility of calling the entire Valley a ''no-go'' area for this & similar Applications.	8. Two detailed studies will be undertaken to determine the potential impact on the agriculture in the valley and in particular on the 550ha mining lease area, namely: a detailed agricultural soils potential of the 550ha mining lease area and a detailed agricultural economic impact assessment to assess the loss of 550ha of agricultural land to mining as described by the Department of Agriculture.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Responding IAPs: **1.** Mr D. Roniger (April 2009); IAPs (30 April 2009); Verlorenvallei Coalition (June 2009); J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers; M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009) ; DJ Smit (1 Junie 2009); MJ. Kellerman (3 June 2009); W. Fourie (2 June 2009) EBEDAG (1 June 2009); S. Jeffery (22 May 2009); S. vander Merwe (25 May 2009); RV Duncan (15 May 2009); M Nicol & J Gallimore (20 May 2009) ; P Louw (25 May 2009); S. Vosse (25 May 2009); Potatoes South Africa – Dr BJ Pieterse (31 May 2009) **2.** F. Strange (23 may 2009); J Turner (17 May 2009); N Taylor (25 May 2009) **3.** AM. Coetzee (31 May 2009) **4.** R. Templeton (22 May 2009) **5.** WESSA (1 June 2009) **6.** RV Duncan (15 May 2009); F van der Merwe Coetzee (29 May 2009) **7.** Wildlife Endangered Trust **8.** Department of Agriculture Western Cape (4 June 2009); C.G De Wet (25 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.8 Impact of noise and air pollution from Mining	1. The IAP stated that only 0.3% of the ore contains Tungsten and only this amount of concentrated ore will be taken away. The rest of the 10.8 million tons will be held in heaps on the mine allotment and cause dust. Slimes dams will also cause dust. This will have a huge effect on the remaining agriculture in the valley. 2. Any dust suppression mechanism involving water adds to the water requirements of the mine, which information has been omitted from the DSR. 3. The mine will generate huge volumes of dust from a number of different sources including the initial overburden stripping, the continuous traffic of large trucks in and out of the excavation as well as increased traffic along the dust road through the Moutonshoek valley, the moving and loading of ore by large earthmoving machines, the ongoing blasting operations, the ore crushing process and the dust blown off the immense overburden dumps. It is most unlikely despite any assurances to the contrary from Bongani Minerals that they will be able to control this hazard the consequences of which are extremely detrimental to human and animal health , to agriculture , to indigenous plant life and to freshwater purity. In terms of the existing legislation if the mining application is approved Bongani Minerals will be required to comply strictly with the limits set down by the authorities and failure to do so will result in closure of the entire mining operation until acceptable levels of dust management have been established to the satisfaction of the authorities. The full extent of the dust dispersal has not yet been established but it appears to be far wider than the immediate vicinity of the mine and the scope of the specialist consultants investigations will have to be broadened accordingly if this is in fact found to be the case.	1. The soil and rock spoil from the mine will be separated according to its types. Each mine dump will be covered with topsoil and alluvium removed from the open cast mine and vegetated with grasses and eventually indigenous vegetation. The slimes dams will also be rehabilitated with time. The volumes and placement of the dumps and slimes dams still need to be determined. Dust is a real threat to human and animal health and to agriculture (fruit and grapes). Dust monitoring will be undertaken and mitigation will be in place to reduce dust pollution. 2. This is an important factor that needs to be taken into consideration as to how much water the mining operation will require. Details of the mine operation and resource use will be finalised in the EIA phase. 3. Noted and see 1.8.1 above. Dust baseline studies will be undertaken in the EIA and will continue throughout the mining phase and long after rehabilitation has taken place.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.8 Impact of noise and air pollution from Mining (Continued)	4. The extent of the surrounding area which will be affected by dust and noise pollution is not defined. Will the area affected by wind carried dust be 100km or 200kilometers in radius or more? 5. If the envisaged dust fall out has the far reaching impact it could have, what kind of plants would survive in a nursery so close to the mining operation? 6. It is stated that ''prevailing wind data and dust monitoring will be important for deciding <u>where</u> to locate mine infrastructure and spoil areas''. Just how much room is there to play with if the data and monitoring indicate the area presently under consideration will not be viable? 7. Significant dust and noise pollution will not be restricted to the site of the proposed mine alone but will spread far and wide, exacerbated by prevailing winds and felt by communities such as Aurora, Dwarskersbos and Eendekuil. The effect of especially dust will be disastrous to crops grown within the Valley and the surrounding area, making farming adjacent to the opencast mine impossible, furthering the disastrous effects on employment within the region. 8. In addition to the concerns around water pollution, air pollution and noise pollution are a significant environmental concern. The scoping report referrers to dust pollution. At the public meeting concerns were raised around release into the air of toxic chemicals. The potential for air pollution needs to be investigated fully by appropriate experts including input on potential effects on human health from the medical fraternity. 9. Continuous blasting 24 hours a day as well as noise from crushing and treatment activities will affect quality of life of residents of an area which up to now has not seen any industrial activities.	4. See 1.8.1 and 1.8.3 above. 5. See 1.8.2 and 1.8.3 above. Dust suppressants will be used. 6. Baseline dust monitoring will be carried out together with wind monitoring. Decisions will be made once all the necessary data is available. 7. See 1.8.1, 1.8.3, 1.8.4, 1.8.5 and 1.8.6 above. 8. See 1.8.7 above. 9. Baseline noise monitoring will be undertaken during the EIA. Noise and vibration (blasting) monitoring will be undertaken throughout the mining phase of the project.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.8 Impact of noise and air pollution from Mining (Continued)	10. Studies monitoring dust can only give an indication of what might happen in an actual mine. Levels of dust, increased wind velocities and literally dozens of wild card factors could turn this into a nightmare that could take years of studies and trial and error to fix. Meanwhile livelihoods from Moutonshoek to Elands Bay and Leipoldville could be destroyed in one hot dry summer. Have existing dust studies for the region been conducted? If so have the consultants had access to these studies? Climate change will likely introduce new and unanticipated factors. It is these inevitable incalculable factors reality kicks up that are of concern. Would the dust be fine enough to become wind borne as far as the coast? In all directions? As far as Cape Town? Will the applicants preliminary dust monitoring stations establish what effect dust coming off the workings will have on water in the vlei, water that will duly flow out and impact on the crayfish and tourism industries that are the only alternatives to farming in the Velorenvallei? Unless they do we will have to assume that included in the inevitable fallout from this proposed mine will be the way of life of yet another black coloured and white community. 11. A toxic fog would rise over the slimesdams as the wind blows, carrying it for kilometres in a toxic blanket. Unless frequent rehabilitation means instant rehabilitation, it is not good enough. The wind does blow in this valley and it will pick up toxic fog even if the slimesdams are rehabilitated weekly. 12. The noise factor is an issue that should be addressed.	10. See 1.8.1 to 1.8.8 above. 11. Slimes dams are generally wet, thus preventing windblown dust. As the slimes dam grows higher, rehabilitation takes place with covering of soil and vegetation. Refer also to 1.8.1 to 1.8.8 above. 12. See 1.8.9 above

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Responding IAPs: **1.** IAP (30 April 2009) **2.** Verlorenvallei Coalition (1 June 2009) ; HC Schmidt (7 May 2009); Namaquasfontein Boerdery Trust (1 June 2009); Kromantoniesrivier Bewarea (1 june 2009) **3.** B Anderson (1 Junie 2009); J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers; M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009); D. Simons (20 May 2009); C. Alexander (2 June 2009); S. Hunter (1 June 2009); W. Fourie (2 June 2009); S. Jeffery (22 May 2009); S. van der Merwe (25 May 2009); G. Clark (24 May 2009); C & V Beautement (26 May 2009); T & T Vanderhaeghen (26 May 2009); PJ Pieters; GS Thomas; MT Johnson; R Cox; C Gradidge; PJE Strauss; JE Paton; RC Cloete (24 May 2009); H Schreiber & G Skog and all employed workers (26 May 2009); M&K de la Rue (29 May 2009); M Pienaar (30 May 2009); V Strydom (24 May 2009); S Fazel-Ellahi (25 may 2009); K Paulse (25 May 2009); M Matzener (24 May 2009); O Curtis (21 May 2009); Eagles Pride Farm (P&A Langton), Piket Bo Berg Inwoners Vereening (D Eigelaar), Achtervlei (K&E Eigelaar) – 27 May 2009 **4.** F. Strange (23 May 2009); Banghoek Private Nature Reserve (20 May 2009) ; DEA&DP (8 July 2009) **5.** F. Strange (23 May 2009) **6.** F. Strange (23 May 2009) **7.** AM Coetzee (31 May 2009); F van der Merwe Coetzee (29 May 2009); M Matzener (24 May 2009) **8.** WESSA (1 June 2009); F van der Merwe Coetzee (29 May 2009) **9.** Eagles Pride Farm (P&A Langton), Piket Bo Berg Inwoners Vereening (D Eigelaar), Achtervlei (K&E Eigelaar) – 27 May 2009 **10.** N Taylor (25 May 2009) **11.** JJ Tredoux (20 May 2009, Namaquasfontein Boerdery Trust (1 June 2009); Kromantoniesrivier Bewarea (1 june 2009) **12.** HC Schmidt (7 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.9 Issue regarding alien and invasive species	1. On page ii of the DSR, "the opportunity to clear alien vegetation and rehabilitate stretches of the Krom Antonies River and river valley river course modification being a recipe which encourages the dominance by alien invader species and dramatic movement of large volumes of sand during floods" was listed as an "opportunity" to be created by the mine. However, had there been compliance with Regulation 49(1)(d) and the DSR had properly identified current land use, the DSR would have reported the extensive measures taken by landowners in the Verlorenvallei since 2005 to address the problems of alien and invasive species. 2. Clearing of alien vegetation has been carried out in the Krom Antonies River valley by the farmers for 14 years to the extent that the water which the river provides to the Verlorenvlei has increased in quantity and quality. We do not need a mine to do this for us. 3. We have been clearing alien species in the Krom Antonies River for 14 years using biological means (galls) and chemical and physical means for 4 years. We have had phenomenal results that have been felt all the way down to the Verlorenvlei. It is a classic case study of a great model of success! By the time Bongani propose to start mining in 2011, there will be very few alien trees to clear. I insist that you also remove this item from your list of opportunities.	1. The specialists are well aware of the programmes of alien vegetation removal within the Verlorenvlei catchment despite the fact that they could not gain access to the land within the Krom Antonies River valley. Once detailed studies have been undertaken the EIA will report on the true state of the environment. 2. See 1.9.1 above. 3. The reference to alien vegetation clearing as an "opportunity" for the proposed mine will be removed from the FSR.

Responding IAPs:
1. Verlorenvallei Coalition (June 2009); WESSA (1 June 2009); M&K de la Rue (29 May 2009); Verlorenvlei Fragrant Products CC (20 May 2009)
2. F. Strange (23 May 2009);
3. Namaquasfontein Boerdery Trust (1 June 2009); Krom Antoniesrivier Bewarea (1 June 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.10 Impact of the Proposed Mining on Verlorenvlei, a Registered Ramsar Site	1. The West Coast Bird Club's objection to the project is the potential damage to Verlorenvlei which is an Internationally Important Bird Area, IBA SA 103 and a Ramsar Site. 2. The Verlorenvlei is internationally recognised under the RAMSAR Convention on Wetlands 1971 and in respect of which South Africa, as a contracting party, has an international law obligation to protect. • Verlorenvlei supports over 189 bird species. • The wetland is regarded as one of the ten most important wetlands for wading birds in the southwestern Cape, a particularly important feeding area for the White Pelican *Pelecanus onocrotalus* and supporting a number of threatened bird species. • It supports over one thousand waders of more than eleven different species, mainly migrants from the northern hemisphere and provides further feeding, nesting and resting facilities. • Greater Flamingo and Lesser Flamingo also occur here, as well as relatively large numbers of little Bittern and Caspian Tern. • The wetland is a moulting ground and winter refuge for large numbers of various species of *Antatidae.* • There are high densities of African marsh harrier which forage over the marsh and reedbank areas as well 4-5 pairs of African Fish eagle. • Significantly large numbers of Great crested grebe, Redknobbed coot, Hartlaub's gull and White-breasted cormorant are also supported at this wetland. • The global fish species population of the Berg river redfin is restricted to Verlorenvlei as well as several endangered mammals and endemic reptiles and snakes.	1. The impacts on the birds of Verlorenvlei will be determined by the inflow of freshwater. As mentioned above, it is therefore vitally important that the potential impacts on the hydrology of the sub-catchment area and the groundwater be determined by specialist studies. An avifaunal survey will be undertaken to assess the potential impacts on avifauna in the area. 2. All the appointed specialists will investigate the potential effects of the proposed mine on the Verlorenvlei ecosystem in view of the fact that it is part of a larger ecosystem and is a registered Ramsar site. Apart from the hydrological, hydrogeological and freshwater ecological studies, a fish and avifaunal study will also be undertaken to assess the potential impacts on the greater Verlorenvlei system.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.10 Impact of the Proposed Mining on Verlorenvlei, a Registered Ramsar Site (Continued)	We would like to request that specialist surveys be conducted on the impact of the mining operation and particularly the effects of water usage for mining, on the Verlorenvlei wetland area. This should include primarily, a specialist bird study but, because of its importance for other taxa, a number of specialist studies must be identified and conducted through the environmental impact assessment process. 3. Verlorenvlei is particularly important in that it is the last water body in the area not to dry up during the dry season, therefore playing its most critical role during times of drought for birds/animals. 4. What exactly will drain into the Verlorenvlei? Which wetland areas will be lost and precisely how much will they be lost? 5. The internationally recognised Ramsar Site of Verlorenvlei is fed by the Krom Antonies River. The important ecological functions provided by wetlands, such as flood attenuation, water storage and purification cannot be ignored in light of climate change and increasing stresses on our county's precious freshwater resources. As stressed in the Scoping Report on pg 21 under point 5.1.7 Dr Liz Day found the Krom Antonies River to be "of potentially high importance in terms of the ecological health or integrity of the downstream Verlorenvlei system and that water quality including sediment, nutrients and dissolved solid loads and concentrations could all have implications for the downstream system. As the Krom Antonies feeds approximately 60% of the incoming water to Verlorenvlei this could have potentially disastrous effects on the vlei. Verlorenvlei stands to be negatively affected both in terms of quality of water and quantity.	3. See 1.10.1 and 1.10.2 above. 4. See 1.10.1 and 1.10.2 above. 5. See 1.10.1 and 1.10.2 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.10 Impact of the Proposed Mining on Verlorenvlei, a Registered Ramsar Site (Continued)	In cases where Ramsar Sites are not managed to an acceptable standard they become in danger of losing their Ramsar Status. South Africa, as signatories to the Ramsar Convention and as a member nation of the International Union for the Conservation of Nature (IUCN) has significant responsibilities in terms of the conservation and protection of its Ramsar sites. In our view, permitting mining in the catchment that feeds Verlorenvlei, will compromise those commitments. 6. A [1]discussion document which was presented at the 36th meeting of the Ramsar-convention's [2]Ramsar Secretariat in February 2008, serves as a best –approach guideline where under this EIA must be initiated. The applicant has to give certainty that the proposed Mining project will not have any negative changes on the Verlorenvlei system, its biodiversity or its ecological functioning. The applicant also has to give certainty that the Verlorenvlei will not (as set out in the Montreux-record of the Ramsar Convention) be considered under prioritised concervation status.[iii] It is important that Cape Nature and DEADP;s National Program for Wetlands will be updated continually.	6. See 1.10.1 and 1.10.2 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.10 Impact of the Proposed Mining on Verlorenvlei, a Registered Ramsar Site (Continued)	7. This Department of Agriculture is also aware that the Moutonshoek Valley is the most significant catchment & source of both surface water &"slower released" seepage water for the very significant wetland lower down in the river system known as Verlorenvlei. Natural wetlands are extremely important to agricultural production as they filter silt & other particles out of the water in & around rivers to create clean, usable water. This Department of Agriculture feels justified in requesting that the above ''Specialist Study on the Impact of the Proposed Activity on the Groundwater Supply and Quality'' be expanded to include a comprehensive "Reserve Determination Study for the Verlorenvlei" in order to determine that the proposed activities will not adversely affect the wetland (Verlorenvlei) which is regarded as being very significant in the bio-diversity which contributes to agricultural production in the region.	7. The hydrological study will assess the annual run-off and together with the results of the CSIR study on the rapid reserve determination method used, the volume of water used by the agricultural sector and that of the proposed mine, and the results of the freshwater ecologist will assess whether the CSIR figures can be used or not.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Responding IAPs: **1.** KHB Harrison – WCBC (22 April 2009); M. Groenewald (1 June 2009); C. Gerber (25 May 2009); W. Fourie (2 June 2009) **2.** BIRDLIFE SA (28 May 2009) IAP (30 April 2009); Verlorenvallei Coalition (1 June 2009); DJ Smit (1 June 2009); R&T Priestley (20 May 2009); T. Laubscher (21 May 2009); AM Coetzee (31 May 2009); F&PA van Bart (31 May 2009); S. Jeffery (22 May 2009); S. van der Merwe (25 May 2009); Petrus Verkuilen (7 May 2009); E. Krause (21 May 2009); K&A Wiese (1 June 2009), HG van Zyl (1 June 2009); C.G De Wet (25 May 2009) **3.** E. Krause (25 May 2009); C. Alexander (2 June 2009); G Clark (24 May 2009); J van der Merwe (June 2009) **4.** F.Strange (23 May 2009) **5.** WESSA (1 June 2009); N. Brown (23 May 2009); CAPE NATURE (18 May 2009); C &V Beautement (26 May 2009); E Krause (21 May 2009); B Anderson (1 June 2009); CPR & AR Schnetler (19 May 2009); M&K de la Rue (29 May 2009); J Anderson (31 may 2009); H. Visser; F. Visser, D Visser (26 May 2009); IC Kotze (24 May 2009); S Vosse (25 May 2009); C George (25 May 2009); K Paulse (25 May 2009); R Stewart (24 May 2009); O Curtis (21 May 2009); J Tarrant (22 May 2009); R McGuffog (21 May 2009); Mouton's Valley Prt Ltd - EW Starke (25 May 2009); F Strange (23 May 2009) **6.** Agri Wes-Cape Wes-Kaap (25 May 2009) **7.** Department Agriculture Western Cape (4 June 2009)			
1. Biophysical Environment	1.11 Impact of Climate Change and Water Use on Available Water Reserves	1. Specialist studies that only capture one year of research data, will not perceive the long term trends of climate change. 2. The crucial issue of climate change and the consequential impacts of climate change on water resources, in particular, are completely ignored in the DSR, the attached specialist reports and the EIA Plan of Study. 3. Will climate change be included in the climate study?	1. It will be important to capture at least one year's worth of biophysical data. This data will be assessed together with the available data for the Verlorenvlei catchment area. Conclusions and recommendations will be based on this data. In addition, the assessment of this data will take into account the available data on climatic change, especially for the West Coast which is anticipated to become drier in future. The drying out of the West Coast will have an impact on water use in this region and potential impacts on the ecosystems of the area can be expected. Remembering of course that mining will only be for 18 years. Climate changes would not be as significant within this time frame. 2. See 1.11.1 above. 3. See 1.11.1 above.
Responding IAPs: **1.** Brian Anderson (30 April 2009) ; H&T Paine (7 May 2009) **2.** Verlorenvalley Coalition(June 2009); J Tarrant (22 May 2009) **3**. F. Strange (23 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.13 The impact of blasting and mine design on the instability of the Piketberg Mountain to the east of the mine.	1. We call for a specialist report on the potential impact of blasting on the aquifers in the area. We call for input and review from CSIR, DWAF and DOA on the effect of blasting on aquifers and resultant potential impact on other water users in the area, including impact on the ecological reserve, with specific reference to Verlorenvlei. The potential to impact aquifers raises concern with respect to other water users in the larger area. 2. Not only is blasting a source of continuous noise pollution but it will generate considerable amounts of dust hazard and the seismic effects may have serious repercussions none of which issues have received any attention in the DSR. Since we have been denied access to the mine design by Bongani Minerals it is not possible to establish the precise dimensions and location of the pit particularly in relation to the slopes of the Piketberg mountains. We have further misgivings regarding the angle of repose of 39^{o} that has been used in the calculations and determines the pit size. If this angle is too steep as our consultant feels it is then a smaller angle of incline will increase the pit size and bring the lip of the pit crater closer to the steep gradient slopes of the Piketberg Mountains. A combination of heavy rain and continuous seismic reaction to blasting may cause some rock as well as fines that make up the loose scree of the mountain foothills to dislodge and slide down the mountain side which in turn could cause a more generalised landslide. This circumstance is evidenced by the problems encountered by the Chapman's Peak Toll Franchise in attempting to stabilise the steep mountainside above the road. Their toll road is closed more often than it is open due to the danger of uncontrolled rock falls. The consequences of a large scale landslide into the pit would be a major disaster and yet there is no mention at all in the DSR of such a serious contingency.	1. Specialist groundwater and geohydrology reports will be done for the EIA phase. DWAF and DoA are commenting bodies on the EIA. 2. Specialist studies to investigate possible impacts will be done in the EIA phase. An in depth geotechnical study is to be undertaken by geotechnical engineers, engineering geologist and mining engineers. The final mine design will be undertaken based on these and other studies to be undertaken. See section 1.8 above. 3. See 1.13.1 above and 1.14.1 below. 4. See 1.13.1 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.13 The impact of blasting and mine design on the instability of the Piketberg Mountain to the east of the mine (continued).	Any indication that there is movement of dislodged rock and /or scree will necessitate immediate cessation of all mining operations until the situation is stabilised. n the light of the hazards and possible damage as well as serious injury in consequence of mining operations I regard it as essential that the Scoping Report include an indepth investigation into the issues of blasting and the possible consequences as well as the remedial measures that are required to secure the affected mountainside. 3. An IAP objects to the casual way in which the DSR refers to the underground water in the proposed pit area of the mine. You should deal with them in this way: "WARNING – AQUIFERS – EXTREME DANGER HERE". To casually mention (by yourself and Mr Visser of SRK) aquifers as if they are small hosepipes that are in the proposed pit area SIMPLY WILL NOT DO. We have done our homework. They contain vast quantities of water on its way somewhere. I spoke to a legal expert involved in the Magaret Shaft in the KOSH area. After a 100 odd years of blasting big holes in that area, they now only have somewhat of an idea as to how the aquifers interconnect etc. To blast open these aquifers is an unreasonable risk for anyone to take. The legal onus is on your scientists to prove ABSOLUTELY that the water in those aquifers was NOT heading somewhere else, and can be safely abstracted without negatively impacting anyone. (The Verlorenvlei being a logical area, but it can very easily be the entire Sandveld or even Namaqualand). Your suggestion that 'a high degree of certainty' is good enough will not do! 4. Referring to Page 29 of the DSR: Due to the nature of aquifers it is hopelessly inadequate to restrict the study to the Krom Antonie River valley. They should be done for a radius of AT LEAST 150 KM.	

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: **1.** Wessa (1 June 2009); RV Duncan (15 May 2009) **2.** B Anderson (1 June 2009) **3.** Namaquasfontein Boerdery Trust (1 June 2009); Krom Antoniesrivier Bewarea (1 June 2009) **4.** Namaquasfontein Boerdery Trust (1 June 2009), Krom Antoniesrivier Bewarea (1 June 2009)			
1. Biophysical Environment	1.14 Impact of the proposed mining on the Greater Cederberg Biodiversity Corridor	1. The Greater Cederberg Biodiversity Corridor is a well-established initiative which aims to connect the Wilderness area of the Cederberg Mountains via a corridor to the sea at Eland's Bay. The Piketberg Mountains and Moutonshoek Valley form an integral part of the proposed Biodiversity Corridor. The presence of a large-scale open-cast mine in the proposed corridor is completely out of line with this initiative, which is why the mine has been rejected, amongst other conservation bodies, by CapeNature and the Wildlife and Environment Society of South Africa. Mining activities and the conservation of the natural environment are entirely incompatible. There are all too many examples of this in South Africa – as a start, one need only to witness the devastation caused by open cast mining on the West Coast north of Lambert's Bay.	1. The mining is to take place within the highly agriculturally developed Krom Antonies River valley and will have no impact on the Piketberg Mountains to the east or south. Mining occurs mostly on old agricultural areas (refer to the gold and coal mines of the old Transvaal region). Most of the old diamond mines on the West Coast have not been rehabilitated. A good example of good mining practises on the West Coast is Namakwa Sands.
RESPONDING IAPS: 1. EBEDAG (1 June 2009); WESSA (1 June 2009) ; AM. Coetzee (31 May 2009); CAPE NATURE (18 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.15 Impact of slime dams on environment	1. The DSR also recommends that all rock and earth dump areas and slimes dams must be kept well away from the 1:100 year flood levels of rivers and streams, and that all water used in the mining and processing operation must be recycled and must be stored in water tight reservoirs to prevent any pollution of groundwater or surface water. It is therefore both puzzling and alarming that, on the current Site Plan (Figure 7 in the DSR), both the spoil dump and the slimes dam are situated right next to the Krom Antonies River. 2. Once again I am unable, with the assistance of our consultant, to assess the dynamics of the slimes dam because we have been denied access to the Metallurgists Report and the Venmyn Rand Mine Design and Concept reports. It is nevertheless apparent to us that the slimes dam will be many times larger than anything indicated in the DSR. In addition we view the position of the slimes dam next to the river as indicated in the DSR to be ill considered particularly when so much emphasis is placed on maintaining an uncontaminated freshwater system. This attitude only reinforces our belief that Bongani Minerals are paying lip service only to the fundamental principles of "clean mining practises". The precise chemical ingredients that are being proposed for the slimes dam contents is also not known to us without the full details that we have been denied access to. We therefore anticipate your full disclosure of information and the prompt delivery of the reports and other issues that we have asked for.	1. The site plan and mining operations is to be informed by the specialist studies and will only be finalised in the EIA. 2. See 1.15.1 above. The specialist initial metallurgical report will be available in the EIA report. The IAP and his consultant will be able to review the EIA and comment on it.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
1. Biophysical Environment	1.15 Impact of slime dams on environment (continued)	3. The storage and or disposal of the waste materials at a Molybdenum / Tungsten mine could directly and indirectly affect agricultural practises in the proximity of such a mine as well as further afield and potentially have a significant impact on agricultural production in the Valley. On the ''chemical reactivity level,'' some minerals, especially sulphide minerals (of which molybdenum is one) will eventually, on exposure to air and water, begin to produce acid which will leach into run-off water to be dispersed into both ground and surface water. The Department of Agriculture therefore requests a Specialist Study at this early stage of the process to Investigate and Review the proposed Storage, Processing and Waste Management Handling, as well as the potential danger imposed by such Waste as a Pollutant to surface & Groundwater, of Mining Sites similar to this one.	3. A detailed hydrogeological assessment of the two aquifer systems will be determined by detailed assessment of shallow and deep boreholes. In addition, a geotechnical assessment of the host rocks and soils will be undertaken. The information gathered from such studies will be used to assess the likelihood of pollution of the aquifers and surface waters during dewatering and minerals processing. The integrated management of waste will be incorporated into the EMP.
RESPONDING IAPS: 1. Verlorenvallei Coalition (1 June 2009); Namaquasfontein Boerdery, Kromantonies Bewarea (1 June 2009) 2. B Anderson (1 June 2009) 3. Department of Agriculture Western Cape (4 June 2009); Agri Wes-Cape Wes- Kaap (25 May 2009); Cape Nature (18 May 2009); Verlorenvlei Fragrant Products CC (20 May 2009) ; DEA&DP (8 July 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
2. Planning	2.1 Alternative Development Options to be Considered	1. The IAP feels there has to be a third alternative that must be considered and that declares the area as a ''No-Go'' zone. 2. Regulation 49(1)(d) of the MPRDA Regulations requires the scoping report to: *"identify and describe reasonable land use or development alternatives to the proposed operation, alternative means of carrying out the proposed operation, and the consequences of not proceeding with the proposed operation"* There are three separate aspects to this requirement, namely: a. Identification and description of "*describe reasonable land use or development alternatives to the proposed operation";* b. Identification and description of "*alternative means of carrying out the proposed operation"*; and c. Identification and description of "*the consequences of not proceeding with the proposed operation".* Only the second requirement has been addressed in the DSR, namely on page ii, as part of the Executive Summary, which describes alternative design alternatives for the mine. The third requirement is addressed in a single line in the DSR, namely "*The no-go alternative will also be considered, in which the status quo for the area will remain, viz. that of agriculture and livestock farming*" (DSR p. ii). Unfortunately it is not sufficient for compliance with Regulation 49(1)(d) to defer this description to the environmental impact assessment – Regulation 49(1)(d) specifically requires the consequences of not proceeding with the proposed operation to be identified and described in the Scoping Report.	1. The so-called "no go" development option is being considered. If the results of the specialist studies indicate that there will be a number of significant negative impacts on the biophysical and socio-economic environments of the Krom Antonies Valley and therefore on the Verlorenvlei, that cannot be sufficiently mitigated, then the recommendation will be made, not only by the specialists, but also by the EAP, that the impact of mining the tungsten deposit will be of such a significant nature that the Mining Right should not be approved. 2. In terms of Alternative options, only two options exist: either mine or don't mine. The ''don't mine'' option means that the status quo remains the same, i.e. that of agriculture. The Alternative will be described in greater detail in the Final Scoping Report.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
2. Planning	2.1 Alternative Development Options to be Considered (Continued)	3. What this mine will cause is downstream damage that others, be it plants, insects, animals or people, will be forced to pay for. There is no possible way any study can anticipate the cost in collateral damage. The mine cannot guarantee a completely closed feedback loop, and is in potential violation of human and animal rights. Therefore I ask the question. How can there be any alternative than the 'no go' option? 4. In terms of the various regulations governing the contents of Basic Assessment and Scoping Reports, applicants are required to consider possible alternatives to their proposals. It never fails to amaze us how frequently applicants, or the consultants appointed by the applicants, come to the conclusion that there are no viable alternatives to their proposals. Vide the comment on page ii of the Executive Summary to the DSR under discussion: "There is no viable project alternative since Bongani Minerals are considering the only technically viable (open-cast) mine design…" This formulaic "reasoning", ("I want X and only X, therefore X is the only option that exists"), is not only illogical but also fails to adhere to the regulations governing scoping and assessment reports. With regard to the present application, there **is** a viable alternative already in existence, i.e. profitable farming activities in a non-industrial environment which offers great opportunities for future eco-tourism.	3. All alternative options will be assessed in the EIA phase. 4. See 2.1.1, 2.1.2 and 2.1.3 above.
RESPONDING IAPS: **1.** Brian Anderson; Dr B. van der Merwe (30 April 2009); IAPs; Endangered Wildlife Trust; DEA&DP (8 July 2009) **2.** Verlorenvallei Coalition (June 2009) **3.** N Taylor (25 May 2009) **4.** EBEDAG (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
3. Engineering Services	3.1 Impact on Infrastructure	1. How will services, such as water and electricity get to the mine and what will the impact be on the surrounding area. 2. What is the proposed routes for the water pipelines that has to bring water from the Berg River and Olifants River? 3. If ESKOM struggles to supply electricity consistently to the district especially in winter where would the mining operation obtain the extra power needed? 4. What is the proposed route for the electricity and where will it come from? What will be the impact of high electricity usage on the surrounding environment along with power shortages in South Africa.	1. Water for mining purposes will be extracted from the dewatering process of the mining operations. The total volume of water actually required will still need to be determined by how much water can be recycled. The processing plant requires about 3500 m^3 per day. Recycling of water will be undertaken. Venmyn Rand (Pty)Ltd. have estimated that 14,945 KW will be absorbed per annum during the establishment of the Concentrator Plant, Tailings Treatment Works, Tailings Dam(s) and Offices and that 801 kW will be absorbed during the establishment of the Concentrates Treatment Plant. Venmyn Rand (Pty)Ltd. have also estimated that a Maximum Demand of 16, 000 KW will be absorbed per annum during the operational phase of the Concentrator Plant, Concentrates Treatment Plant Tailings Treatment Works, Tailings Dam(s) and Offices. These estimates will however be verified by the appointed Civil Engineer for the project during the EIA phase. Should an upgrade of electricity be needed it may well following the existing alignment of the powerlines into the Krom Antonies Valley. An engineering services report will be compiled in the EIA phase detailing all services for the proposed mine. 2. Water will not be piped from the Berg or Olifants Rivers. Refer to 3.1.1 3. Refer to 3.1.1 4. Refer to 3.1.1

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
2. Planning	3.1 Impact on Infrastructure (continued)	5. Blasting within the mine will further result in the spread of dust and the damage to infrastructure (cracking of walls, etc.) on properties surrounding the proposed location of the mine. 6. The client must provide accurate and detailed information to all the specialists regarding their intended scale and extent of mining activities, details of the physical and chemical processes that will be used and descriptions of all infrastructures that would need to be built. 7. Based on the current information available, CapeNature believes that the proposed mining activities and the associated increase in population, which will bring with it the need for additional roads, water supply, sewage and waste disposal, poses a high level of risk to the terrestrial and aquatic ecosystems in the area and their functioning. We believe that the proposed mine is entirely inappropriate for the area and could have significant and irreversible impacts on the environment.	5. The spread of dust from blasting cannot be mitigated. Fortunately very little dust is created by blasting granite rock. Blasting will probably have very little to no impact on the cracking of buildings. A crack survey will be conducted of all structures within the vicinity of the mine. A vibration monitor will monitor shock waves generated by blasting. Certain norms exist and the results need to be provided to the Mine Commissioner. 6. Details of the mining activity, any processes involved and all infrastructures will be given to all specialists. 7. The impact of the proposed mine and associated activities will be assessed during the EIA process.

Responding IAPs:

IAP (30 April 2009); Agri Wes-Cape Wes-Kaap (25 May 2009)

2. J.Tredoux (20May 2009)
3. F. Strange (23 May 2009);
4. J. Tredoux (20 May 2009)
5. Eendekuil BV (1 June 2009); AM Coetzee (31 May 2009)
6. CAPE NATURE (18 May 2009)
7. CAPE NATURE (18 May 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
3. Engineering Services	3.2 Traffic Impact of Mining on Road Infrastructure and N7 Road	1. What will the effect be of the mine on the road infrastructure of the region and on the N7 Road (probably from Piketberg to Cape Town)? 2. Whether the tungsten and molybdenum produced by the mining operation are to be transported by road or rail to Saldanha Bay, surely either mode would have a negative impact on a far wider geography than envisaged in the report? The roads between the Moutonshoek and Saldanha Bay would require major infrastructural improvements and a new rail link would have a negative impact on way of life of those in proximity to it and the environment surrounding it both during construction and operation. 3. How wide is the 'study area'? Does the traffic impact take into account the pollution impact, the social impact of noise and road impact on ecosystems and animal corridors, the crime potential, the far reaching impact of destinations such as Saldanha? I notice elsewhere Saldanha is identified as the 'export port'. Does this study include an assessment of ecological social and economic impacts on this already overstressed and overdeveloped bay region? 4. The current road infrastructure will be damaged by the heavy traffic required for the project. All vehicles utilized by contractors and the mine should be licensed by the local Municipality so that some portion of the license fees is used to defray maintenance costs.	1. The road from Het Kruis to Moutons Hoek (mine) will need to be upgraded (probably tarred) as staff for the mine will be bussed in on a daily basis (probably three shifts, as the mine will work 24hrs a day). The amount of additional traffic using the N7 for servicing the mine will probably be insignificant if the existing background traffic on the N7 Road is taken into consideration. A traffic impact assessment will be undertaken to assess the potential impacts of traffic. 2. Refer 3.2.1 above. No rail link is envisaged. 3. If the proposed Tungsten concentrate is shipped from Saldanha harbour, no additional assessments need to be undertaken as these have already been done for the latest upgrade of the harbour. The increased traffic through the valley will be assessed as part of the TIA. According to the latest ecological studies for the upgrade of the harbour, the bay is not stressed. 4. Upgrades to the current road infrastructure will be undertaken by the mining company. A services report (including roads) will be done in the EIA phase. All vehicles will be legally licensed and registered accordingly.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
3. Engineering Services	3.2 Traffic Impact of Mining on Road Infrastructure and N7 Road (Continued)	5. Chemical substances such as Tungsten, Molybdenum Sulfide, Ammonia, Soda Ash) will be delivered to the mine processing plant by road transport if this project is granted approval. These chemicals, according to the DSR will be used in the ore processing system and it is a matter for concern that the delivery trucks would have to use the R365 either from Elands Bay or from Piketberg. In either instance they would be forced to negotiate sections of unsurfaced dirt road that are not frequently graded and are in constant need of attention. In addition these roads become extremely dangerous after heavy rainfalls as many a motorist has found to his deep regret standing alongside the road next to his overturned vehicle. The chemicals in question are all hazardous in varying degrees and it should be born in mind that all vehicles will be required to carry the regulation Hazmat signs. It is also the responsibility of Bongani Minerals to ensure that all necessary steps are taken to secure optimum safety if they use these roads for transporting hazardous materials and it is therefore my contention that if they wish to undertake a project such as this they must macadamise the unpaved sections and maintain the roads in good order having regard to the severe punishment that they will suffer from the constant traffic of heavy transport. The serious matter of road use and the danger of Hazmat materials is not covered in the DSR. 6. The report refers to the site being accessed by tarred roads. The IAP states that this is not exactly true. How and where to will the final product be transported?	5. Refer 3.2.4 above. 6. Refer to 3.2.1, 3.2.3, 3.2.4.
Responding IAPs: **1.** Mr J. Louw (2 May 2009); WESSA (1 June 2009); Banghoek Private Nature Reserve (20 May 2009) ; DEA&DP (8 July 2009) **2.** F. Strange (23 May 2009) **3.** N Taylor (25 May 2009) **4.** K Harrison - West Coast Bird Club (4 May 2009) **5.** B Anderson (1 June 2009) **6.** Verlorenvelei Fragrant Products CC (20 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
3. Engineering Services	3.3 Issue of waste management	1. The issue of waste management is also glossed over in the DSR. On page 10, the DSR states that "[w]aste rock, overburden and topsoil will be separately stockpiled at the surface, near the edge of the open-pit (the specific locations still need to be determined) (Figure 5). These stockpiles are also known as waste dumps. The waste dumps will be tiered and stepped, to minimise degradation (erosion)." However, Figure 5 indicates the proposed location of a waste dump. the design, location and management of a tailings dam containing toxic slurry is of major concern to the Verlorenvallei Coalition. As pointed out in paragraph 106 above, the DSR itself points out that the tailings dam should be situated as far as possible from "highly transmissive fault structures" and well away from the 1:100 year flood levels of rivers and streams (page 29). However, on Figure 5 the tailings dam seems to be situated directly next to the Krom Antonies River! The Coalition therefore requires detailed information on the proposed design, location and management of a tailings dam, including what tailings thickener would be used. 2. Storm water run-off from the mining operations is likely to impact on water quality in the river. Waste rock dumps and tailings dams are notorious for causing groundwater contamination problems as a result of leachate generation and run-off, and are very difficult to manage. The tailings dam is located right next to the river - this is a recipe for disaster. 3. The soils collected, as mentioned on p.28 of the Scoping report, are to be disposed of at a suitable licensed waste disposal facility. • Where will this facility be located? • What would be the risk of contamination from such a facility? • How will the soil be transported to the facility?	1. Detail surrounding the tailing dams and other infrastructure will be informed by the results of the various specialist studies to be done and will be finalised towards the end of the EIA process. 2. Refer 3.3.1 above. 3. Refer 3.1.1 and 3.1.8 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: 1. Verlorenvallei Coalition(1 June 2009) ; N Taylor (25 May 2009) 2. EBEDAG (1 June 2009) ; DEA&DP (8 July 2009) 3. L. Pieters (29 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
3. Engineering Services	3.4 Concerns about the proposed design of the open cast mining project	1. Why are existing homes, stables, barns and packing sheds not considered to be structures? 2. **Greenfield Project.** This is an interesting definition and interpretation that takes no cognisance of impacts on the natural (and social) environments. • This presumably should be read in terms of an industrial context? • Do horse paddocks and outbuildings not constitute existing structures? It is hardly possible for IAPs to make an informed decision without all the relevant documentation at hand. As the **Venmyn Rand Concept Plan** is fundamental to the functioning and scheduling of the proposed mine, it is in the public interest for this document to be released into the public domain a.s.a.p. 3. Upon review of available documentation it is apparent that Venmyn Rand are compiling, or have already compiled, a Concept Study (or similar study) dealing with establishment of an open-pit mine with related mineral processing facilities, tailings dumps, slimes dams and ancillary site infrastructure and services at Riviera. I am hereby requesting access to that entire work, or any other similar entire work, in order to evaluate the impacts covered by the current Mining Right Application. 4. It is not clear how Bongani Minerals Pty Ltd has planned a large mining operation with extremely limited geological and mineralogical information available to it. At the same time, public information available on the tungsten deposit indicates that the grade of the deposit is at best marginal. In addition, Bongani Minerals Pty Ltd has apparently refused IAPs access to such information as is available and has been produced for Bongani Minerals Pty Ltd, such as the Venmyn Concept study.	1. In terms of the ''Greenfield Project'', there are no buildings on the 550ha site of the proposed mine. No buildings adjacent to the 550ha mine site will need to be demolished. 2. The results of the Venmyn Rand Concept Report will be made known in the revised Scoping Report and the whole report copied as an Appendix to the Final Scoping Report. 3. Refer to 3.4.2 above 4. Refer to 3.4.2 above. The results are based on very detailed exploration undertaken by Union Carbide and Anglo American during the 1980's. At the current tungsten prices, the proposed Riviera Tungsten mine is highly viable.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: **1.** F. Strange (23 May 2009) **2.** AM Grutter (1 June 2009) **3.** H Grutter (29 May 2009) **4.** Verlorenvalley Coalition (1 June 2009); B Anderson (1 June 2009); Agri Wes-Cape Wes-Kaap (25 May 2009) ; DEA&DP (8 July 2009)			
3. Engineering Services	3.5 Processing of Tungsten	1. In regard to further processing of tungsten concentrate it is stated '' Little information is available regarding these processes.'' Does this mean we cannot be sure of the impact of the mining process or that the unavailable information has subsequently been obtained? 2. What process will be followed to extract the tungsten from the erts?	1. Because of the trademark secrets of processing tungsten certain sensitive information cannot be recorded. The basic processing plant and the chemicals used area described in the revised Scoping Report. 2. There are two processes as described in the DSR. The ultimate process to be used in the processing plant is unknown at this stage. More details will be provided in the EIA.
RESPONDING IAPS: 1. Eendekuil BV (1 June 2009) ; F. Strange (23 May 2009); AM Grutter (1 June 2009); Agri Wes-Cape Wes-Kaap (25 May 2009) 2. Eendekuil BV (1 June 2009); J. Tredoux (20 May 2009) ; DEA&DP (8 July 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.1 Impact of Proposed Mining on Existing Jobs	1. Agriculture is the biggest work provider in the area. The mine will terminate agriculture and no work will be provided for the community. 2. Many permanent and contract farm workers, most of whom are women, will lose their jobs if this mining is permitted. As is so often the case in these situations, jobs created by these types of ventures will always be far lower than the actual jobs that are lost. With the high levels of unemployment in SA this is completely and utterly unacceptable, many will have to move away from their families to find work, creating yet another migration of our labour force from their homes as is so often the case. The area will never recover from this loss and the job loss factor will be devastating to the local community. 3. Local people (by the hundreds) stand to be displaced and their jobs will be affected. Unsustainable Migrant Labour issues will become inevitable. Farm workers from Moutonshoek, Redelingshuys to Elands Bay could possibly lose their jobs and houses if agricultural activities are affected by the mine. Mining practices require skills largely not found within this region and thus will result in workers from other areas being employed, and not people from the region itself. The effects on females, benefiting from employment on farms, pack-stores, etc, will unarguably be rife and they would be out of work. The loss of employment will have extreme effects on a social level and increased levels of crime in a comparatively crime free area will imminently follow. 4. The IAP asked how many jobs will be created. Also concerned about the wellbeing of the women and older people on the farms. 5. What is the risk to agricultural jobs should the mine cause pollution of water (above and underground) relative to the creation of 407 job opportunities by the mine?	1. The mine will provide 300 job opportunities during the mine construction phase and 400 during the operational phase. As much local labour from Piketberg and surrounds will be hired as possible. The specialist socio-economic assessment must be undertaken to assess the loss of agricultural jobs as a result of the proposed mine and associate such losses with gains provided by the mine. It will also be important to take into consideration the relatively short mining period of 18 years as opposed to the permanency of agriculture in such a socio-economic assessment. Not all agricultural jobs will be lost in the valley. Potential job losses will be quantified in the socio-economic impact assessment. 2. The loss of jobs, especially those of women, will be considered in the socio-economic assessment that still needs to be undertaken to assess the impact on the socio-economic well-being of the agricultural industry in the Krom Antonies Valley. The displacement of farm workers will also need to be assessed. 3. The losses of jobs as a result of the proposed mine will be considered as part of the socio-economic assessment. The possibility of displacement of staff off the farms will also need to be addressed. 4. Refer to 4.1.1 above. 5. As mentioned above, the risks of pollution need to be determined by the hydrological and hydrogeological studies. Refer to 4.1.2 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.1 Impact of Proposed Mining on Existing Jobs (Continued)	6. There is a misrepresentation in the DSR that there is a ''high level of unemployment'' in the Piketberg area. Statistics from Statistics SA relied on by the specialist concerned clearly indicates that the unemployment rate in the Bergriver municipal area is just over 5%, compared to the national average which exceeds 20%. A statement that an unemployment rate of just over 5 % constitutes a 'high level of unemployment'' constitutes inaccurate, incorrect and misleading information within the meaning of Section 98(b) of the MPRDA. 7. There is a misrepresentation regarding ''current underemployment'' in the Piketberg Magisterial District. The Bergrivier economy makes a significant contribution to government income (6.14% of the turnover generated by levy-paying firms in the West Coast District in 2005-2006; and the Bergriver economy grew at a rate of 10.33% from 2004-2006, in contrast with the rest of the West Coast District (decline of 5.03%) – that is significantly more than the national economy. 8. On page 32-33 of the DSR, it is stated that the estimate of the employment required to establish the Tungsten Mine and erect associated facilities is approximately 320. This is misleading, since: a) ''note once again that these jobs are of a temporary nature and will slowly fall away once construction of the infrastructure and superstructure components are completed'' (App7, p29); and b) even in its own estimates, the DSR (p.33) relies on no more than 20% use of local labour. 20% of the anticipated 320 jobs created during the construction phase amounts to only 64 jobs.	6. The data contained in the DSR was obtained from the Social and Labour Plan. The socio-economic impact assessment will quantify the unemployment rate in the Piketberg area. 7. These figures will be quantifies and verified in the EIA. 8. Refer 4.1.1 and 4.1.2 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.1 Impact of Proposed Mining on Existing Jobs (Continued)	9. No mention is made in the DSR of research conducted or to be conducted as part of the EIA on unemployment that will be caused by the mine. Any EIA that does not include research on actual current employment that will be affected by the mine would be fatally flawed. The Verlorenvallei Coalition estimates that at least 500 people are permanently employment on the farms that will be destroyed by the mine, and the jobs of at least 1000 seasonal workers will be lost as a result of the mine. Many of these workers are woman who are unlikely to be employed by the mine. 10. The DSR does not in any way put forward a plan or purpose of further research into the following issues: a) What financial or other support will be provided to the workers and also the spouses of the workers who will have to be retrenched by the farms destroyed by the min? b) Are there any plans to replace current social and welfare support for workers in the area (currently provided by the farms)?	9. Refer 4.1.1 to 4.1.3 above. 10. It is not the place of the DSR to contain such detail. The DSR is to scope issues. This is an issue that has been revised and will be studied further in the socio-economic impact assessment of the EIA. Refer 4.1.1 to 4.1.3 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.1 Impact of Proposed Mining on Existing Jobs (Continued)	11. At the public meeting it was stated that the mining operation would provide a total of 407 jobs (information provided by Withers Environmental Consulting in their presentation). The Krom Antonies Conservancy have estimated that approximately 500 permanent and 1000 contract farm workers could lose their jobs if the mine were to go ahead. Given the high levels of unemployment in SA a net loss of jobs in the area is unacceptable, as is the displacement of farm workers and their dependant families. In addition it is of great concern that the jobs provided by the mine would last for the duration of the mining activity, which is noted in the scoping report is a period of 18 to 20 years. We call for a specialist study to address this aspect. 12. What is the plan to support the farm workers that will lose their jobs because of the mine? 13. We are advised by Mr A Withers of WEC that should the proposed mining activity be approved, mine workers will be housed in Piketberg and not on the mine itself. The social dislocation will have enormous effects on the farm workers currently employed in the area. Where are they to live? Where will their children go to school? What will become of their homes where many of them were born? The DSR is silent on all these aspects. 14. The IAPs has the following concerns about the impacts of the proposed mine • Many permanent and contract farm workers, most of whom are women, will lose their jobs if this mining is permitted • Where are we as men going to find jobs and houses? • Where are we as women going to find jobs? • Where will our children go to school?	11. Refer 4.1.1 to 4.1.3 above. 12. Refer 4.1.1 to 4.1.3 above. 13. Refer 4.1.1 to 4.1.3 above. 14. Refer 4.1.1 to 4.1.3 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE

Responding IAPs :

1. Mr Dexter Roniger (April 2009); J. Nichols (April 2009); IAPs (30 April 2009); AM Coetzee (31 May 2009); S. Jeffery (22 May 2009); Agri Wes-Cape Wes-Kaap (25 May 2009); J van der Merwe (June 2009)
2. Janeen Nichols (21 April 2009); IAPs (30 April 2009); C. Gerber (25 May 2009); AM Coetzee(31 May 2009)
3. E. Swanepoel; J. Swanepoel; D. Swanepoel; G. Snyders; M. Jafta; J. Snyders; K. Taylor; L. Bosman; A. Lamont; S. Karolis (9 May 2009); M. Van Lill Snr (23 May 2009) ; IAPs (30 April 2009); J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers; M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009) ; J. Daniels; K. Swarts; G. Engelbrecht; E. van der Westhuizen; P. van der Westhuizen; R. Swarts; B. Goedeman; S. Lof; L. Enodada; C. De Wet; M. Swanepoel; C. Jacobs; W. Jafta; D. Mhlophe; J. van Wyk; J. Jacobs; C. van Wyk (11 May 2009); F. Strange (23 May 2009); Eendekuil BV (1 June 2009); W. Fourie (2 June 2009); AM. Coetzee (31 May 2009); J Turner (17 May 2009); P. Kelly (26 May 2009); T & T Vanderhaeghen (26 May 2009); TA Toontjies; D Boonzaaier; JA Goliath; A van Wyk; K Skirmaans; M Skirmaans; jf Boonzaaier; G Pieters; A Dzai; W Toontjies; W Jacobs; J van Rooyen; M Mabetha; S. Tjotsane; A de Bruin; M Jacobs; J Jacobs; M Mentoor; C Conrad; I Frans; J Lewies; M van Wyk; K Mentoor; Q van Wyk; C van Wyk; S Oktober; G Sofat; J Swarts; H Valentyn; M Van Wyk; L Willemse; A van wyk; J Smit; N Oktober; J Mesias; A Erasmus; J Muller; J Oktober; J Willemse; A Klase; T Erasmus; G Mswaka; P Mukasvi; Odeku; M Okien; S Tromp; L Gabriel; Hector; C Elisher; Johnny Mujeny; Benny; D Mabaso; G Mesias; A Klase; J Erasmus; S Blankenberg; M van wyk; M Willemse; J Muller; J Bwanamali; E Marks; M Kutsogola; L Dube; M Irvin; M Goliath; S Karolis; M Franse; S Goliath; Elia H; E Smith; M Goeieman; A Pieters; A Sabbat; K Franse; P Matebise; K van Wyk; R Stevens; L Carolus; J Shompana; M Dalingozi; Lysie David; C van Wyk; M Fleur; J Michaels; GJ Smit; C Frans; M van Wyk; M van Zyl; J Goliath; S Oktober; A Snyers; S Engelbrecht; J Willemse; M Pietersen; H Maarman; R Diedericks; M van Zyl; A Maarman; J Willemse; T Snyers; S Klaasen; R. Snyders; PJ Pieters; GS Thomas; MT Johnson; R Cox; C Gradidge; PJE Strauss; JE Paton; RC Cloete (24 My 2009); M&J Thomson (28 May 2009); M&K de la Rue (29 May 2009); L Smith (1 June 2009) ; D Stevens (31 May 2009); S Kilbey (25 May 2009); H. Visser; F. Visser, D Visser (26 May 2009); IC Kotze (24 May 2009); H Horne (25 May 2009); R Humphreys (25 May 2009); M Pienaar (30 May 2009), B Clark (25 May 2009), V Strydom (24 May 2009), S Fazel-Ellahi (25 May 2009); C George (25 May 2009)K Paulse (25 May 2009) A&K Smith, E. Smith, CA Smith, AJ Kaardom, ID 750622, J Engelbrecht, S Faro, G Faro, P&R Engelbrecht, D&E Markus (1 June 2009); M Matzener (24 May 2009); G Allderman (21 May 2009); S Giles (22 May 2009); R McGuffog (21 May 2009); EBEDAG (1 June 2009); Verlorenvlei Fragrant Products CC (20 May 2009); S Martin (16 June 2009); AM Grutter 1 June 2009); Namaquasfontein Boerdery Trust (1 June 2009); Krom Antoniesrivier Bewarea (1 June 2009); H&T Paine (7 May 2009)
4. IAP (30 April 2009)
5. IAP (30 April 2009)
6. Verlorenvalley Coalition (1 June 2009); Eendekuil BV (1 Junie 2009); WESSA (1 June 2009); M&K de la Rue (29 May 2009); N Taylor (25 May 2009); Namaquasfontein Boerdery Trust (1 June 2009); Krom Antoniesriver Bewarea (1 June 2009); CG de Wet –Uitsig (25 May 2009)
7. Verlorenvallei Coalition (1 June 2009); WESSA (1 June 2009); N Taylor (25 May 209); Namaquasfontein Boerdery Trust (1 June 2009); Krom Antoniesriver Bewarea (1 June 2009); CG de Wet –Uitsig (25 May 2009)
8. Verlorenvallei Coalition (1 June 2009)
9. Verlorenvallei Coalition (1 June 2009)
10. Verlorenvallei Coalition (1 June 2009); J. Tredoux (20 May 2009)
11. WESSA (1 June 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
12. TA Toontjies; D Boonzaaier; JA Goliath; A van Wyk; K Skirmaans; M Skirmaans; jf Boonzaaier; G Pieters; A Dzai; W Toontjies; W Jacobs; J van Rooyen; M Mabetha; S. Tjotsane; A de Bruin; M Jacobs; J Jacobs; M Mentoor; C Conrad; I Frans; J Lewies; M van Wyk; K Mentoor; Q van Wyk; C van Wyk; S Oktober; G Sofat; J Swarts; H Valentyn; M Van Wyk; L Willemse; A van wyk; J Smit; N Oktober; J Mesias; A Erasmus; J Muller; J Oktober; J Willemse; A Klase; T Erasmus; G Mswaka; P Mukasvi; Odeku; M Okien; S Tromp; L Gabriel; Hector; C Elisher; Johnny Mujeny; Benny; D Mabaso; G Mesias; A Klase; J Erasmus; S Blankenberg; M van wyk; M Willemse; J Muller; J Bwanamali; E Marks; M Kutsogola; L Dube; M Irvin; M Goliath; S Karolis; M Franse; S Goliath; Elia H; E Smith; M Goeieman; A Pieters; A Sabbat; K Franse; P Matebise; K van Wyk; R Stevens; L Carolus; J Shompana; M Dalingozi; Lysie David; C van Wyk; M Fleur; J Michaels; GJ Smit; C Frans; M van Wyk; M van Zyl; J Goliath; S Oktober; A Snyers; S Engelbrecht; J Willemse; M Pietersen; H Maarman; R Diedericks; M van Zyl; A Maarman; J Willemse; T Snyers; S Klaasen; R. Snyders; (June 2009) 13. EBEDAG (1 June 2009) 14. DJ Smit (1 June 2009)			
4. Socio-Economic	4.2 Impact of Dust on Fruit Industry	1. It is a known fact that dust has a huge impact on the setting of fruit (soft fruits and grapes) with the result that the proposed mining would have a devastating impact on the fruit farms of the Krom Antonies Valley. 2. We export fruit and flowers produced on the top of Piketberg Mountain and would appreciate a serious look at the impact of wind borne dust on these crops.	1. Dust monitoring will need to be undertaken throughout the life of the mine (operational and closure). Certain mitigation measures can be taken to reduce dust, but the incidence of dust will always be a factor. The degree of dust pollution from the mine is a factor of management (EMP). The potential economic losses to the fruit, flower and grape (export and wine) will need to be determined against the economics of the mine (which is seen as a temporary industry 18 years) in a socio-economic impact assessment to be done in the EIA phase. 2. See 4.2.1 above.
RESPONDING IAPS: 1. IAP 2. G Nieuwoudt (25 May 2009)			
4. Socio-Economic	4.3 Impact of Falling Tungsten Prices on Mining in Krom Antonies Valley	1. Should mining be in operation based on the current price of tungsten (which currently makes the mine economically feasible), what will happen to the mine (infrastructure and waste dumps) should the price fall and the mine no longer becomes economically viable to mine?	1. Bongani Minerals, with its Mining Right would need to provide financial securities to DME for the rehabilitation of the mine, should the mine stop production or should the mining company be declared insolvent, then the securities provided by Bongani Minerals will be used to rehabilitate the mine area.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: 1. IAP (30 April 2009); N Taylor (25 May 2009)			
4. Socio-Economic	4.4 Impact of mine on the value of affected property	1. The possibility of such a mining operation in the region has already struck fear into the hearts of the people and negatively affected property values and willingness to make capital investment particularly in the agricultural sector. 2. We own property bordering on the Verlorenvlei and have invested in our future by purchasing this small piece of land. This is supposed to be our place of retirement one day and we simply will not accept that through possible contamination or overuse of the water in the Vlei, it could be drained of all life. It would devalue our investment and with it our future. 3. Property sales in the area are increasingly to so call 'lifestyle 'farmers where the aesthetic appeal of a property has a significant and sometimes greater value than the commercial potential of the property for farming purposes. The unspoilt nature of the Moutonshoek area has a high potential for tourism as well as 'lifestyle' properties. This mine development will negate any such potential of the properties in the immediate area and lead to decreased property values.	1. The impact of the proposed mine on property values will be assessed in a socio-economic impact assessment to be done in the EIA phase. 2. Refer 4.4.1 above. 3. Refer 4.4.1 above.
RESPONDING IAPS: 1. F. Strange (23 May 2009); Banghoek Private Nature Reserve (20 May 2009); Agri Wes-Cape Wes-Kaap (25 May 2009) 2. L. Pieters (29 May 2009); 3. Eagles Pride Farm (P&A Langton), Piket Bo Berg Inwoners Vereening (D Eigelaar), Achtervlei (K&E Eigelaar) – 27 May 2009			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.5. Impact of Proposed mining on the Karookop school	1. Because of non-compliance with Regulations 49(1)(d), no mention is made of fact that the mine would force the closure of the Karookop Primary School. If the proposed mine proceeds as planned by Bongani Minerals Pty Ltd. Karookop Primary Schools would be situated a few hundred metres from the mining site. All 117 children would have to relocate to schools in Eendekuil or Piketberg, with concomitant transport and supervision problems created for the parents of the children. No EIA will be complete without a full investigation into the provision of primary education to the children of the valley with and without the mine, in accordance with Regulation 49(1)(d). 2. The IAPs are concerned about the possible closure of the school for the children.	1. If the school is forced to close because of the close proximity to the mine, the mining company should provide another school in a more suitable locality. 2. Refer 4.5.1 above.
Responding IAPs: **1.** Verlorenvallei Coalition (1 Junie 2009) **2.** TA Toontjies; D Boonzaaier; JA Goliath; A van Wyk; K Skirmaans; M Skirmaans; jf Boonzaaier; G Pieters; A Dzai; W Toontjies; W Jacobs; J van Rooyen; M Mabetha; S. Tjotsane; A de Bruin; M Jacobs; J Jacobs; M Mentoor; C Conrad; I Frans; J Lewies; M van Wyk; K Mentoor; Q van Wyk; C van Wyk; S Oktober; G Sofat; J Swarts; H Valentyn; M Van Wyk; L Willemse; A van wyk; J Smit; N Oktober; J Mesias; A Erasmus; J Muller; J Oktober; J Willemse; A Klase; T Erasmus; G Mswaka; Odeku; M Okien; P Mukasvi; Odeku; M Okien; S Tromp; L Gabriel; Hector; C Elisher; Johnny Mujeny; Benny; D Mabaso; G Mesias; A Klase; J Erasmus; S Blankenberg; M van wyk; M Willemse; J Muller; J Bwanamali; E Marks; M Kutsogola; L Dube; M Irvin; M Goliath; S Karolis; M Franse; S Goliath; Elia H; E Smith; M Goeieman; A Pieters; A Sabbat; K Franse; P Matebise; K van Wyk; R Stevens; L Carolus; J Shompana; M Dalingozi; Lysie David; C van Wyk; M Fleur; J Michaels; GJ Smit; C Frans; M van Wyk; M van Zyl; J Goliath; S Oktober; A Snyers; S Engelbrecht; J Willemse; M Pietersen; H Maarman; R Diedericks; M van Zyl; A Maarman; J Willemse; T Snyers; S Klaasen; R. Snyders; E Smith (1 June 2009); D&E Markus (1 June 2009)		

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.6 Vulnerable people and social development support	1. The DSR makes no reference to the existence of vulnerable people (the aged, ill and disabled people), also as result of an inadequate assessment of the status quo in the area (and as a result of non-compliance with Regulation 49(1)(d). 2. The impact on the socio-economic environment of the region will be immediate, it will be mostly negative and it will certainly last much longer than the 20 year lifespan of the mine. Our children will lose their inheritance and that is no trifle matter in a country where the Government is not able to look after their elderly as they should, and the elderly have to rely on their children to take care of them. So the impact of the mine will stretch into the future for generations!	1. A socio-economic assessment will be undertaken in the EIA phase. 2. Refer 4.6.1 above.

RESPONDING IAPS:
1. Verlorenvallei Coalition (1 June 2009)
2. L. Pieters (29 May 2009); G. Wessmann (23 May 2009); S Martin (16 June 2009); B Campbell (24 May 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.7 Impact of the proposed mine on the way of life and the sense of the place	1. Many Coalition members have raised the impacts that the proposed mine would have on the way of life and sense of place of the Verlorenvallei. Some members also link this to other development initiatives less destructive than a mine, such as tourism. Because of the DSR's non-compliance with Regulation 49(1)(d), none of these issues have been identified and described as required. 2. The proposed mine could destroy the physical and cultural lifestyle of the Verlorenvlei community forever. 3. The mine will destroy the livelihoods ◈ of all our employees and their families that live on the farm ◈ of all my neighbours including every person and family in the valley The damage to the community that has farmed here for over 300 years will be irreversible. It may even destroy all communities all the way to Elands Bay. 4. This socio economic aspect of the proposed mine is rather like informing the Moutonshoek community their valley is to become a nuclear testing site, but every effort will be made to look after you if you suffer in any way and … we promise to try and make good once the test is over in twenty years or so and … then you can all come back and resume your old way of life. Is the applicant serious? The statement 'It should be noted that this impact will only be felt for the approximate 20year lifespan of the mine' is either irresponsible callous or at best disingenuous. The impact has already been felt with farms currently on the market becoming unsalable, worker morale low due to uncertainty, and a high volume of anger and resentment preoccupying many of the local community.	1. Specialist socio-economic, visual and heritage assessments will be undertaken in the EIA phase. The loss of way of life and sense of place needs to be weighed against any possible positive impacts of the proposed mine. 2. Refer 4.7.1 above. 3. Refer 4.7.1 above. 4. Refer 4.7.1 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: 1. Verlorenvallei Coalition (1 June 2009); Mr & Mrs Josephs (25 May 2009) 2. J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers; M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009); W. Fourie (2 June 2009); T. Laubscher (21 May 2009); J. Tredoux (20 May 2009); D Burke (29 May 2009); H. Visser; F. Visser, D Visser (26 May 2009); IC Kotze (24 May 2009); M Burger (29 May 2009); M Pienaar (30 May 2009); V Strydom (24 May 2009); K Paulse (25 May 2009); S Martin (16 June 2009) 3. J. van der Merwe (June 2009); L. Pieters (29 May 2009); N. Brown (23 May 2009); G. Clark (24 May 2009); M Nicol & J Gallimore (20 May 2009); P&K Carter (25 May 2009)TA Toontjies; D Boonzaaier; JA Goliath; A van Wyk; K Skirmaans; M Skirmaans; jf Boonzaaier; G Pieters; A Dzai; W Toontjies; W Jacobs; J van Rooyen; M Mabetha; S. Tjotsane; A de Bruin; M Jacobs; J Jacobs; M Mentoor; C Conrad; I Frans; J Lewies; M van Wyk; K Mentoor; Q van Wyk; C van Wyk; S Oktober; G Sofat; J Swarts; H Valentyn; M Van Wyk; L Willemse; A van wyk; J Smit; N Oktober; J Mesias; A Erasmus; J Muller; J Oktober; J Willemse; A Klase; T Erasmus; G Mswaka; P Mukasvi; Odeku ; M Okien; S Tromp; L Gabriel; Hector; C Elisher; Johnny Mujeny; Benny; D Mabaso; G Mesias; A Klase; J Erasmus; S Blankenberg; M van wyk; M Willemse; J Muller; J Bwanamali; E Marks; M Kutsogola; L Dube; M Irvin; M Goliath; S Karolis; M Franse; S Goliath; Elia H; E Smith; M Goeieman; A Pieters; A Sabbat; K Franse; P Matebise; K van Wyk; R Stevens; L Carolus; J Shompana; M Dalingozi; Lysie David; C van Wyk; M Fleur; J Michaels; GJ Smit; C Frans; M van Wyk; M van Zyl; J Goliath; S Oktober; A Snyers; S Engelbrecht; J Willemse; M Pietersen; H Maarman; R Diedericks; M van Zyl; A Maarman; J Willemse; T Snyers; S Klaasen; R. Snyders; PJ Pieters; GS Thomas; MT Johnson; R Cox; C Gradidge; PJE Strauss; JE Paton; RC Cloete (24 My 2009); T&T vanderhaeghen (26 May 2009); J&J van Kraayenburg (25 May 2009); F Strange (23 may 2009) 4. N Taylor (25 May 2009)			
4. Socio-Economic	4.8 Impact of the proposed mining on housing in the district	1. Who will be responsible to prevent illegal squatter camps being erected and chopping of firewood on surrounding farms with or without permission from the land owners? The IAP have worked on the following two projects and he saw the negative effect that the squatter camps had on the community: a) the Mandela squatter camp in Koekenaap as a result of the Namakwasand Mineral Mine . b) the George Carraige squatter camp in Vredenburg as a result of Saldanha Staal and Namakwasands South project. 2. Where will the permanent workers of the mine be accommodated? 3. Who will be responsible for damage being done on the land where the mine group don't have any rights?	1. Housing will be provided for workers in Piketberg and workers will be bussed to the mine daily. No squatters will be allowed to settle on private land. Owners of property will be responsible for preventing squatters settling on their properties. 2. See 4.8.1 above. 3. A sewage system will be provided by the mining company. The water will be recycled once it has been treated for use in the mine. Groundwater will not be polluted by sewage.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: **1.** J Tredoux (20 May 2009) **2.** TA Toontjies; D Boonzaaier; JA Goliath; A van Wyk; K Skirmaans; M Skirmaans; jf Boonzaaier; G Pieters; A Dzai; W Toontjies; W Jacobs; J van Rooyen; M Mabetha; S. Tjotsane; A de Bruin; M Jacobs; J Jacobs; M Mentoor; C Conrad; I Frans; J Lewies; M van Wyk; K Mentoor; Q van Wyk; C van Wyk; S Oktober; G Sofat; J Swarts; H Valentyn; M Van Wyk; L Willemse; A van wyk; J Smit; N Oktober; J Mesias; A Erasmus; J Muller; J Oktober; J Willemse; A Klase; T Erasmus; G Mswaka; P Mukasvi; Odeku; M Okien; S Tromp; L Gabriel; Hector; C Elisher; Johnny Mujeny; Benny; D Mabaso; G Mesias; A Klase; J Erasmus; S Blankenberg; M van wyk; M Willemse; J Muller; J Bwanamali; E Marks; M Kutsogola; L Dube; M Irvin; M Goliath; S Karolis; M Franse; S Goliath; Elia H; E Smith; M Goeieman; A Pieters; A Sabbat; K Franse; P Matebise; K van Wyk; R Stevens; L Carolus; J Shompana; M Dalingozi; Lysie David; C van Wyk; M Fleur; J Michaels; GJ Smit; C Frans; M van Wyk; M van Zyl; J Goliath; S Oktober; A Snyers; S Engelbrecht; J Willemse; M Pietersen; H Maarman; R Diedericks; M van Zyl; A Maarman; J Willemse; T Snyers; S Klaasen; R. Snyders; **3.** EBEDAG (1 June 2009)			
4. Socio-Economic	4.9 Impact of Proposed Mining on Tourism	1. The effect on tourism in the area could be a major factor, especially if the one takes into account all the potential negative effects from mining such as pollution, degradation of the wetlands, the visual impact of an unsightly opencast mine, dust pollution/settlement, noise pollution, increased traffic of heavy mining vehicles, diversion of water and resultant death of Verlorenvlei Ecosystem, Tourists visits the Valley because of the peacefulness and beauty of the area. 2. The International Tourist industry around Birding and Spring Flower Watching which is the area's main source of income will be jeopardised. 3. The threat to tourism in the area from the proposed mine is self evident if account is taken of the possible draining of the Verlorenvlei by over extraction of water and / or toxic pollution thereof. Likewise if the Elands Bay beach and bay are contaminated with dirty or polluted waste water from the mine this will be a definite deterrent to the surfing community. The full economic benefits of tourism in this area have not been fully quantified and its contribution to the fiscus adequately identified and yet the DSR does not consider the significant value of tourism at all in its assessment of loss of benefits due to the mining operation . I feel that the DSR falls glaringly short and call on Withers Environmental Consultants to remedy this omission.	1. The impacts of the proposed mine on tourism will to a large degree depend on the impacts on the biophysical environment of the region, and especially the impacts of water (agriculture and ecosystem of Verlorenvlei) and dust on agriculture (fruit, grapes and race horses). Refer to Section 1, 4.2, 4.4 and 4.6 above. 2. If there is any chance that the mine will cause so much pollution that Verlorenvlei will be severely impacted on the authorities will not approve mining. 3. Refer 4.2.1 above. The DSR is not supposed to address issues, but rather table them. The EIA phase addresses such issues and assesses the significance of their potential impact caused by the proposed mining.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Responding IAPs: 1. Mr Dexter Roniger (April 2009); IAPs (30 April 2009); DJ Smit (1 June 2009); C. Alexander (2 June 2009); S. Hunter (1 June 2009); AM Coetzee (31 May 2009); F van der Merwe Coetzee (29 May 2009); J Louw (25 May 2009); S Martin (16 June 2009); A van Zyl (18 June 2009); L du Toit (17 June 2009) 2. Janeen Nichols (21 April 2009); S. Hunter (1 June 2009); M. Nicol & J. Gallimore (20 May 2009); M&K de la Rue (29 May 2009); JB Viljoen (31 May 2009) 3. B Anderson (1 June 2009); JB Viljoen (31 May 2009); M Boonzaaier (31 May 2009)			
4. Socio-Economic	4.10 Impact of Mining and Infrastructure on Cultural Landscape	1. Mr Dexter and others believes that the mining proposed for this area is inappropriate and will have a negative effect on both the natural and human landscape. This area also falls into the Greater Cederberg Biodiversity Corridor and is part of a landscape wide biodiversity conservation plan. With this mining various sources of pollution will be created including air, water and noise pollution which are a huge environmental concern.	1. The potential impact of the proposed mine on the cultural landscape of the Krom Antonies Valley will need to be assessed by a specialist heritage consultant. The impact on the historic buildings in the area will also need to be assessed.
Responding IAPs: 1. Mr Dexter Roniger (April 2009), IAPs (30 April 2009); EBEDAG (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.11 Economic Impact on Mining on agricultural economy in the valley	1. Farming and agricultural enterprises will be compromised by the proposed mining. 2. The potato industry in the Sandveld is the largest provider of food and work in the Western Cape and will be terminated by the proposed mining. 3. The socio-economic benefits cannot be for the surrounding farming community as they will be unable to live in the area, the fruit export industry which brings in foreign revenue and provides work may well be no longer viable and revenue from the mine will actually go to very few. 4. The mine will destroy profitable and productive farms in the area and will threaten the food security in the Western Cape. 5. The mine will affect the Piket-bo-berg farms and all who inhabit it. The IAPs live on part of the Piket-bo-berg on Farm Edelweiss and farms with Protea, Leucodendron and Leucospermum flowers. Up to 50hectares is reserved for cultivated product for export and the local market, Rooibos and Buchu is also farmed to a lesser degree, the balance is left as pristine fynbos as possible, housing all the wildlife it can support. The mine will destroy life as we know it and fruit and flower farms alike. 6. We are a fruit farming company, based on top of the Piketberg mountain. We employ a workforce of 500 during season and 200 permanent workers. We as farmers are dependant on boreholes for irrigation. 7. We live on a smallholding in Kapteinskloof at the foot of the Piketberg mountain range and about 15kms from the proposed mine and believe that the proposed mine would spell economic ruin for the area.	1. Apart from the potential losses of jobs and its socio-economic impact on the region, the impact of the proposed mining on the economic agricultural industry of the Krom Antonies Valley will be assessed against the relatively short term economic gains of mining. An agricultural economist will provide an economic assessment of such potential impacts. 2. Refer to 4.11.1 above. 3. Refer to 4.11.1 above. 4. Refer to 4.11.1 above. 5. Refer to 4.11.1 above. 6. Refer to 4.11.1 above. 7. Refer to 4.11.1 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.11 Economic Impact on Mining on agricultural economy in the valley (Continued)	8. Our Protest is mainly based on the fact that mining is planned for this 45 hectares of Table grapes portion, which will be lost for export production. Varies reasons could be listed for this of which the main reasons are: o A shortage of underground water, pH values, chemical compositions and toxicity as well as dust residue. o Export standards regulated by PPECB (Perishable Product Export Control Board) states that dust residue on Table Grapes for export purposes must not exceed the indicated standaard of 1 on D12 color chart. (Roads in and around vineyards sprayed with water daily to prevent dust residue on grapes) o Cost implications through the loss of production on the farms Namaquasfontein and Kromvlei amounts to R 12 600 000.00 per annum. (on 45 hectares alone) Over a periode of 20 years the loss of income will exceed amounts of R252 000 000 (Inflation not considered) 9. The mine will also negatively affect the export fruit farming activities on the Piketberg mountain, particularly Mouton's Valley, as we are the closest to the proposed mine. We will be affected by the mine pollution, the influx of people trying to access Piketberg via our farm and added pressure on our precious and limited water resources. We feel that the mine will also present a security risk to our business.	8. Refer to 4.11.1 and 4.1.2 above. 9. Refer to 4.11.1 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.11 Economic Impact on Mining on agricultural economy in the valley (Continued)	10. Matroozefontein obtains its water from 15 boreholes on the farm. Matroozefontein has a permit to withdraw more than 2 million cubic meters of water/annum. Unifrutti has spent a considerable sum of money investigating the long term sustainable yield and quality of the water from the boreholes on the farm before it purchased the farm in 2004. The tests were done by De Villiers Visser Besproeiing and analyzed by SRK consulting (Compiled by A.C. Woodford). The tests were done for the planning of future citrus and table grape plantings on the farm. Any negative impact to the water resources on the farm will jeopardize the current and future developments on Matroozefontein. This will have negative implications on the long term profitability of the farm and negatively impact employment in the area. Matroozefontein employs a large number of seasonal and permanent people (in excess of 250 people). Currently Matroozefontein is monitoring its boreholes(levels and water quality) on a monthly basis. It is also using electronic divers to check the long term levels of the underground water. 11. The IAPs formally questions the financial viability of the proposed mine considering that the proposed mine poses numerous risks to the environment, as confirmed by the specialists in the DSR; and is likely to have major impacts on the livelihoods of the community in the Verlorenvallei; and the proposed mine has apparently been planned with limited geological and mineralogical data., the Coalition formally demands that Bongani Minerals Pty Ltd provides details of their calculations, with supporting evidence, to support their contention that the proposed mine is financially viable. We appeal to the Department of Mining to require Bongani Minerals Pty Ltd to make such information, which should include at least the mining work programme submitted to the Department in terms of Regulation 10 and 11, available to IAPs.	10. Refer to 4.11.1 and 4.1.2 above. 11. Refer to 4.11.1 and 3.4.4 above. 12. Refer to 4.11.1 and 3.4.4 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.11 Economic Impact on Mining on agricultural economy in the valley (Continued)	12. A quick Google search proves that, of current mines, none operate with such a low grade ore (0,2-0,3%), but all much higher. At the PP meeting of 30 April Mr Van der Walt of Batla claimed the Bruto worth of the tungsten was around R20 billion. With the current exchange rate it would near R16 billion. Batla is Frenchoning 49% of Bongani. Thus near R8 billion does not come back into South Africa. He also claims that Batla may purchase another 26% of Bongani. (I do not know how this is possible – BEE) then only R4 billion will remain. Who would take the chance with all these constraints for such a small return, with such a high chance of failure? 13. The proposed mine will have a positive economic injection to the area.	13. Noted.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE

Responding IAPs:

1. IAP (30 April 2009) ; J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers; M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009); M. Groenewald (1 June 2009); S. Hunter (1 June 2009); W. Fourie (2 June 2009); S. Jeffery (22 May 2009); S Kilbey (25 May 2009); F van der Merwe Coetzee (29 May 2009); Agri Wes-Cape Wes-Kaap (25 May 2009);
2. Dr van der Merwe (30 April 2009), IAPs (30 April 2009); S. Hunter (1 June 2009); P Louw (25 May 2009) L Smith (1 June 2009)
3. F. Strange (23 May 2009); R. Templeton (22 May 2009); P & R Abbot (23 May 2009); G de I Kock (28 May 2009); L Smith (1 June 2009); J Morgan (31 May 2009); JB Viljoen (31 May 2009); M Matzener (24 May 2009)
4. S van der Merwe (25 May 2009); P&R Abbot (23 May 2009) ; G. Clark (24 May 2009); RV Duncan (15 May 2009); T & T Vanderhaeghen (26 May 2009) PJ Pieters; GS Thomas; MT Johnson; R Cox; C Gradidge; PJE Strauss; JE Paton; RC Cloete (24 My 2009); P Louw (25 May 2009) G De Kock (28 May 2009); S Kilbey (25 May 2009); IC Kotze (24 May 2009) H. Visser; F. Visser, D Visser (26 May 2009); F van der Merwe Coetzee (29 May 2009); M Burger (29 May 2009); J Laubscher (29 May 2009); S Vosse (25 May 2009); M Pienaar (30 May 2009); B. Clark (25 May 2009); V Strydom (24 May 2009); S Fazel-Ellahi (25 May 2009)K Paulse (25 May 2009) E Smith, CA Smith, AJ Kaardom, J Engelbrecht, G Faro, P& R Engelbrecht, K&A Wiese (1 June 2009), HG van Zyl (1 June 2009); G Allderman (21 may 2009); C&M Loewenthal (27 May 2009)
5. P & R Abbot (23 May 2009)
6. H Schreiber & G Skog and all employed workers (26 May 2009)
7. C&M Loewenthal (27 May 2009)
8. The Grape Company (30 May 2009)
9. Mouton's Valley Pty Ltd - EW Starke (25 May 2009)
10. Unifrutti Matroozefontein (6 May 2009)
11. Verlorenvallei Coalition (1 June 2009); CPR & AR Schnetler (19 May 2009)
12. Namaquasfontein Boerdery Trust (1 June 2009), Kromantoniesrivier Bewarea (1 June 2009)
13. Mr. B. Smith (6 May 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.12 Impacts of mining on economic input and jobs at a local level	1. The loss of productive farming land and loss of jobs associated with farming practices will further result in a decrease of economic input into local suppliers of farming appliances, seed and seedlings, feed, fertilisers, etc. A vast array of businesses, from grocery stores, street vendors, clothing stores, steakhouses and others, will further experience a loss of income due to the loss of employment within the farming sector. This in turn results in loss of employment within surrounding towns. The extremely limited lifespan of the proposed mine (in relation to farming practices that have been sustained within the area for nearly two centuries and will continue to do so sustainably for centuries to come) will not provide sufficient economic input to sustain businesses in these towns. The many examples of towns where the economy have collapsed after mining practices have stopped, is proof enough. 2. The IAP would like a full cost benefit analysis of the short term benefits of mining versus the potential long term benefits of ecotourism and farming in this area is undertaken. 3. The draft scoping report does not present me with any evidence as to what the total revenue injection to the region will be (the only cursory mention of a Rand figure of 'initial direct investment ... of between R1,2 and R1,5 billion over the first five years of operations' on page 34 of the Draft Scoping Report), how this revenue breaks down, what portion of this will remain in the hands of the mine owners, what trickle-down effect (in Rands and cents terms) will be felt by local communities? What's the quid pro quo for a mine which will displace landowners, uproot farm labourers, bring generations of an agrarian community to an abrupt halt and could most probably pollute the local environment immeasurably?	1. Specialist socio-economic assessments will be undertaken in the EIA phase. 2. Refer 4.12.1 above. 3. Refer 4.12.1 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: 1. AM. Coetzee (31 May 2009); R. Templeton (22 May 2009) 2. C. Gelderblom (25 May 2009) 3. AM Grutter (1 June 2009)			
4. Socio-Economic	4.13 Impacts of Mining in the area on social welfare	1. According to Umcebisi Business Advisers (Pty) Ltd there are benefits associated with the Riviera Tungsten Project and that it could improve the social welfare of the community. I strongly object to the link being created between the proposed mine and the "improvement" of social welfare of the local communities. Our social welfare could be measured against the very low crime rate, lack of widespread diseases in such as HIV/Aids, TB as well as the low incidents of rape and violent assaults. We are of the opinion that the jobs to be created through the Tungsten mine will be for a few skilled people and that said skilled people will be introduced into our local communities and create with it a whole new type of "social welfare". The men are concerned for their wives' and daughters' safety, as they are usually the first targets for violent crimes, rape and infection with HIV/Aids. A current "social welfare" we can do without! The low crime statistics speak volumes in terms of social welfare. We are satisfied with our social welfare at the moment and most people live in this area because they have chosen the quiet and restful pace of life. We do not want it disturbed, or ruined by the possibility of a very few people, making a huge amount of profit at the cost of decimating our beautiful valley with devastating effects as far afield as the Namaqualand! We simply do not measure our "social welfare" with Rands and Cents	1. Refer section 4.12 and 4.6 above.
RESPONDING IAP: 1. L. Pieters (29 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.14 Concerns about the Social and Labour Plan	1. The IAP object to the fact that Prof Blooms states that such a plan will become the **"**building blocks for future economic development and growth of the local area". This plan is supposed to offer people opportunity to become functionally literate and numerate, learnership, skills programmes, portable skills and any other training as part of human resource development. Local Government should be investing in creating opportunities for our local human resource to be trained in the type of agriculture currently present in our area, We don't want Bongani Minerals (Pty) Ltd to be granted a mining license with the capacity to provide employment for only 407 people (a debatable figure) for a period of +- 20 years, in order for the Government (Local and National) to abscond their responsibilities toward our local labour force.	1. The mining company is obligated to undertake training and skills development as is contained in the Social and labour Plan put forward in the Mining Right application. The socio-economic impact assessment will take this further and provide tangible recommendations in this regard.
RESPONDING IAP: 1. L. Pieters (29 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.15. Visual Impact	1. The location of the proposed mine in an area which has breathtaking mountain scenery and a splendid rural farm setting is a most dismal and devastating thought. Any suggestion that this mine will not completely destroy the entire district and its people is frankly utter nonsense. A first time traveller to this area confronted by a massive crater surrounded by ugly dumps of overburden and a complex of industrial buildings with crusher and milling plants and a huge slimes dam would think that all the demons in hell had been let lose to destroy one of the most beautiful valleys on the entire west coast. This enormous and ugly pit will not only be a great wound to the body of mother earth it will also be an unhealing wound to our nation. To consider this wanton destruction for mercenary gain is to sell your soul for *"thirty pieces of silver"*. 2. The pit itself, the slimes dams, the heaps of overburden rock and waste rock are going to have a significant negative visual impact especially for residents who are close to the mine. The historical lack of will by government to force rehabilitation as well as lack of commitment by mining companies to rehabilitate on cessation of mining activities means that the pit, slimes dams and dumps will become a permanent feature of the area. There are many examples all over the country where this can be shown to be the case.	1. A visual and heritage impact assessment will be undertaken in the EIA phase. 2. Refer 4.15.1 above. The heritage impact assessment will undertake to assess the mine, with its dumps, in terms of the sense of place. A mine rehabilitation plan will also be undertaken. The rehabilitation of the mine area and its dumps has to be undertaken by the mining company. Collateral is put in place for rehabilitation.
Responding IAPs 1. B Anderson (1 June 2009) 2. Eagles Pride Farm (P&A Langton), Piket Bo Berg Inwoners Vereening (D Eigelaar), Achtervlei (K&E Eigelaar) – 27 May 2009			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
4. Socio-Economic	4.16 Light Pollution	1. In point no. 6 of your scoping report, 'Type and scale of possible environmental impacts', you neglected to include the impact of light pollution. Obviously you have never observed the night skies of the area and were never overawed by the scale and immensity of the universe around you. Maybe your little ego would have shrunk a little then and words of praise like that of a poet or psalmist may have shed a little light in the darkness. Instead the glaring artificial spotlights of your mining rigs will obliterate the stellar beauty of the universe, and to such a mind-set the universe will be a place of darkness.	1. A Visual Impact Assessment that addresses "light pollution" will be undertaken in the EIA.
RESPONDING IAPS: **1.** F & PA van Bart (31 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.1 Impacts of the Previous Prospecting Right Application on the Present Mining Right Application	1. The devious and underhanded manner by which this application has been dealt with in the past gives no confidence in the manner in which the new process will be logical and fair and much legal activity is envisaged before the dust starts to rise from this destroyed valley. How DEAT is going to approve the impact study is beyond my comprehension. 2. The full history of the previous prospected rights has not been included in the Draft Scoping Report. 3. The question was asked whether the objections given for the Prospecting Right Application by IAPs could be carried over to the new Mining Right Application. 4. The first application from Bongani has been rejected. What has changed that new applications are being considered again? 5. As this is the fourth application for mining rights in the valley, despite the previous three being turned down, I find it alarming and audacious, especially since we were assured by the Chairperson of the Remdec meeting of 26/02/2009 that not another application by Bongani Minerals will be considered. Even more surprising is the fact that in all your previous applications there were gross irregularities and total disregard for the rules and regulations of the DME. I will not allow any person or entity access to my farm for the purpose of prospecting. 6. In addition to the gross irregularities with regard to the whole question of the prospecting rights, it is apparent that at some stage prior to April 2009, Withers Environmental Consultants (WEC) were briefed by the applicant to start preparing a Scoping Report for the mining rights application. We do not know when this mandate was given to WEC, save that the Job No. on the front page of the DSR is 07/11/1190.	1. WEC cannot vouch for the way in which the Prospecting Right was obtained, but it is hardly likely that DME would approve an application that was “devious” or “underhand”. Certainly, the current application for a Mining Right is being conducted according to the strict requirements of the MPRD Act. In terms of the current application, a Scoping Process and an EIA process is being undertaken. In addition, an EIA application in terms of NEMA also needs to be carried out for various triggers of the R396 and R387 Regulations. In addition, an application for a Departure in terms of Section 15 of LUPO (15 of 1985) must be granted for a temporary change in Land Use before mining can begin (from the Berg River Municipality). 2. Since this application deals with a Mining Right there is no need to provide the history for the application for a Prospecting Right. The history section of the current report deals with the history of the tungsten mineralisation. 3. Since the current application deals with an application for a Mining Right, the IAPs need to provide their objections and concerns again for the current EIA process being run. 4. This is the first Mining Right application by Bongani Minerals. A Prospecting Right has previously been granted, but has since lapsed. 5. See 5.1.1 and 5.1.4 above. We believe that the chairperson referred to another Prospecting Right by Bongani would not be entertained before the Judicial Review had been resolved. The Prospecting Right subsequently lapsed and the Judicial Review therefore fell away. The Bongani application is for a Mining Right.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.1 Impacts of the Previous Prospecting Right Application on the Present Mining Right Application (continued)	We presume that this number refers to 7 November, either 2007 or 2008. Whatever the case, and we believe it is important for WEC to disclose to I&AP's the exact date when it received the mandate, it is quite clear that the DSR, (48 pages without annexure), could NOT have been prepared and made ready for publication during the two months of March and April 2009. The conclusion to be drawn is that WEC and specialists appointed by the consultancy, started to work on the DSR several months, if not years, in anticipation of an application for mining rights being made to the DME. We find it unacceptable that the process re the mining rights application was embarked upon **before** the judicial review scheduled for 29 April 2009. We believe that on these grounds **alone**, the present application should be placed on hold until such time as the judicial review is re-instated.	6. Refer to 8.5.1.1 and 8.5.1.5 above. WEC was appointed by Bongani Minerals in November 2007 to undertake a desktop study (due diligence) regarding the requirements of NEMA for the proposed mining of tungsten in the Krom Antonies River valley. Wiaan Basson of Messrs Rock Ventures has been appointed by Bongani Minerals to project mange the propose Riviera Tungsten Mining Project, including the submission of the Mining Right Application to DME in terms of MPRDA. WEC was requested on 6 February 2008 to provide a quote for undertaking an application in terms of NEMA for the proposed Riviera Tungsten Project. WEC together with SRK, Ninham Shand, Dr. C. Boucher and Dr. Day were appointed on 14 December 2008 to undertake a NEMA application. WEC was appointed by Bongani Minerals on 1 April 2009 to assist them with the MPRDA application since Messrs Rock Ventures had resigned from the project.

RESPONDING IAPS:

1. Prof W van Riet & S. Prinsloo (April 2009)
2. Dr B. vd Merwe (30 April 2009)
3. Mrs vd Merwe (30 April 2009)
4. DJ Smit (1 June 2009)
5. L. Rothquel (17 April 2009)
6. EBEDAG (24 May 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.2 The Legal Process Regarding Public Participation	1. If the application for a Mining Right is still in the beginning stages, why is this process so hasty and why was the notice of the meeting given with such a short lead time. 2. Inappropriate and offensive reference to coloured members of the community at the one and only public consultation meeting to date. 3. The variety of issues included in the scoping report and the number of people who could potentially be affected mean that the meeting will not cover all relevant matters in one day. What guarantees will be given regarding provision of proper sound recording equipment, microphones so people can be heard by all present and absolutely accurate recording of the names of all people present? 4. What procedures will be put in place to ensure that all IAPs have adequate opportunity to raise their objections to this development? The IAP would like to be informed of any meetings well in advance so we are able to attend.	1. The MPRD Act only provides a timeframe of 30 days from the date of acceptance of the Mining Right Application to submit the Final Scoping Report. A public meeting has to be held within this timeframe and therefore the notice of the meeting is shorter than that for the NEMA process (which in this case still needs to be undertaken). The comment period for the public participation process is, however, 30 days. Thus comment for the Scoping Process is for a 30 day period after the advertisement, i.e. to 25 May 2009. Comments received by this date will be submitted to DME for consideration with the Final Scoping Report. As it is, DME has instructed that the DSR be revised in accordance with the comments received from the IAPs during the initial 30 day comment period and that the Revised Scoping Report be made available to registered IAPs. 2. The EAP referred to the coloured workers of the farm as the “volk”. Being English speaking and having to address the meeting in Afrikaans the EAP was not under the impression that this was a derogatory term. The EAP apologises unconditionally for using this term and it was not used with any disrespect. 3. A second public meeting will be held where all IAPs can discuss issues with the specialist consultants. No formal meeting will take place and the Open Day will be held over a whole day. 4. All public meetings will be advertised in the local and regional newspapers 14 days in advance of the meeting and all registered IAPs will be informed of public meetings. Refer to 5.1.3 above.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.2 The Legal Process Regarding Public Participation (cintinued)	5. The report specifically mentions the public participation process undertaken for the Prospecting Application. Again I find it contradictory that at the meeting Mr Withers states in front of 300 odd people that this is totally separate from the Mining Right Application. I believe the full extent of IAP input from a far wider range of people and interests was not considered in both the Prospecting and Mining Applications. The applicant and consultants must surely be aware the impact of this mine is far reaching. Your own report suggests this. The assumption that the bare legal requirement would suffice was in my view an arbitrary decision taken without consideration for the communities directly and indirectly affected by a proposal such as this. 6. The meeting was an insult to all of the interested and affected parties (IAP) as to how the meeting was conducted. The notice period was hopelessly too short and the obvious 'ticking of boxes' or 'following the Process" was disgusting. Participants travelled far and wide and most had to sacrifice a whole day's work to listen to (in our opinion) pro forma generic drivel. We object to this and will not tolerate such interaction in the future. Do not even attempt to waste our time with such poorly researched rubbish. We agree with the lady who suggested you fire your secretary for preparing such a poor powerpoint presentation for you. We are fighting for our lives and for generations to come. The least you can do is treat us with the respect we deserve	5. The Prospecting application has nothing to do with the Mining Right application which is a new process. The Mining Right Application allows for at least two public meetings. An Open day will be held to discuss the EIA with its specialist studies. 6. The fact that 175 IAPs attended the meeting indicates that notification, whether directly or indirectly had the desired effect. Scoping meetings are not for providing detailed information but rather for allowing the opportunity for IAPs to provide comments, information and suggestions to the process. The meeting achieved this (refer to the notes recorded at the meeting).

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.2 The Legal Process Regarding Public Participation (Continued)	7. Why were the press advertisements informing the public about a meeting to discuss the DSR only placed on Wednesday 22 April 2009 and Thursday 23 April 2009, seven days before the meeting on 30 April 2009? Why were these advertisements placed over the period of national and provincial parliamentary elections in South Africa? (N.B. 22 April 2009 was a public holiday.) We regard the timing of the press advertisements and the seven day notice period of the public meeting as procedural irregularities which further render the public participation process followed to date inadequate and invalid. 8. In my view both the identification of and notification to IAPs has either been arbitrary, selective with ulterior motive, or at best without proper consideration of relevant considerations. What does the applicant intend to do to remedy this flaw in the process if it goes to the next stage? 9. The report indicates that the same process of identifying and notifying IAPs will be used as in the Scoping process, and will place advertisements in the Burger regional newspaper and the local Swartlander. As I find this decision arbitrary and insulting I venture to ask: a. Did the consultant take into account the broad based opposition to this proposal? b. Has the consultant considered the link between the wider area of some of the studies and the demographics of the IAP base?	7. See 5.2.1 above. Please note that the Swartlander newspaper only comes out on a Wednesday, which happened to be a public holiday for voting. 8. Refer to 5.2.1 and 5.2.4 above. 9. The method of advertisement by the EAP is within norms of the legal process. In future, the EAP will also advertise the EIA process in the Cape Times to reach the English public in Cape Town and Western Cape region.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.2 The Legal Process Regarding Public Participation (Continued)	c. On what research if any did the consultant base the decision as to how to advertise? d. Does the consultant know the circulation figures and reach of the newspapers used? e. Has the consultant any idea of the demographic makeup of the area? f. Has the consultant considered radio as a medium of communication g. Has the consultant taken into account isiXhosa speakers in the potentially affected areas? 10. This SCOPING REPORT and the POWERPOINT PRESENTATION at meetings are in English only. The applicant and WEC considered advertising in Die Burger and Swartlander targeted the correct demographic profile. Why were both the above not in Afrikaans as well? Was there an ulterior purpose or motive? Were relevant considerations not considered? Was there a failure to take a decision? Was the decision simply arbitrarily taken? 11. This office understands that there has been previous legal action during a previous, related Application regarding this Applicant, for rights on similar, if not the same, portions of land. This came about as a result of previous Public Participation – the Department of Agriculture is bemused as to why this legal action is not being taken into account by DME in an effort to spare this and other commenting authorities time and resource wastage. This office feels that because of the previous events this PPP needs to be both more comprehensive and more thoroughly interrogated than usual and request that a very transparent and thorough PPP be ensured by DME during this Application.	10. Whilst the slide presentation was in English, the verbal presentation took place mostly in Afrikaans. No ulterior motive was meant by the slides being in English. 11. The previous public participation process was undertaken in terms of the Prospecting Right Application. The current application is for a Mining Right. A full public participation process is being undertaken. Another round of public participation will be undertaken during the EIA phase. It should also be noted that a full EIA process needs to be taken in terms of NEMA.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: 1. Philippa Huntly (WESSA) 2. Verlorenvallei Coalition (1 June 2009) 3. F. Strange (23 May 2009) 4. C. Gelderblom (25 May 2009); C. Lancellas & C. Barvir (22 May 2009) 5. N Taylor (25 May 2009) 6. Namaquasfontein Boerdery Trust (1 June 2009), Kromantoniesriver Bewarea (1 June 2009), J van der Merwe (June 2009) 7. EBEDAG (1 June 2009) 8. N Taylor (25 May 2009); AM Grutter (1 June 2009) 9. N Taylor (25 May 2009) 10. N Taylor (25 May 2009) 11. Department of Agriculture Western Cape (4 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.3 Mineral Rights Approval	1. Bongani Minerals' application to the Department of Mineral and Energy (DME) has been accepted. The IAP enquired if this means that Bongani Minerals has already obtained Mineral Rights to mine. 2. The company behind the mine has very dubious credentials and obtaining the mining license can only be achieved by illegal activities as evidenced by the manner in which the prospecting rights were attempted to the attained. 3. I note the Mining Application was signed on the 25 March 2009 and the Scoping report required by 18 April 2009. [less than the MPRDA minimum requirement for public participation] This just before a general election begs the question: Was this action of signing the application while the Prospecting Application was still to go to court, arbitrarily made without the relevant considerations being taken into account? 4. If the Prospecting right application is a totally separate issue from the Mining right application as repeatedly stated by Mr Withers at the meeting on 30 April 2009 [and tacitly agreed by Mr Van der Walts silence], it should not be used as part of this process, or used as reference for identifying IAPs. I and several other IAPs would like a full and satisfactory explanation of Mr Withers stance on this matter. I would also like to know why the Mining Application could not wait till the Prospecting Application case was heard in a court of law? Were WESSA and Cape Nature notified as IAPs? If so when and how? Do WEC have proof of notification?	1. The DME has only accepted the Mining Right application for the applicant to appoint an environmental assessment practitioner to undertake an EIA process, which includes a public participation process (i.e. this process, which includes the public meeting held, forms part of the Scoping process). No mining rights have been approved by DME, thus far. 2. The management of Bongani Minerals takes exception to the insinuations that it is acting illegally in anyway. 3. Refer to 5.2.1 and 5.2.7 above. Please note that IAPs were given the required 30 days to provide written notice on the DSR. These written comments were captured (this table) and have been included in the Revised Scoping Report. IAPs have again been given the opportunity (30 days) to comment on the RSR. 4. Whilst the two processes are completely separate applications, there is no reason why the relevant concerns of IAPs that commented on the application could not be used in the Mining Right Application. Similarly for the use of the registered IAPs. Since the prospecting application was about to expire and since the Review application was set down to be heard in the court after this date, Bongani Minerals were obligated to lodge their Mining Right application. WESSA and CapeNature were notified. Proof of such notification is available in the Final Scoping report.
RESPONDING IAPS: 1. IAP (30 April 2009) 2. C Gerber (25 May 2009) 3. N Taylor (25 May 2009) 4. N Taylor (25 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.4 National Water Act Implications	1. Is the National Water Act not affected by the process and why is it not being discussed at the meeting? 2. DWAF have serious concerns regarding this application and the impacts the project can have on surface and groundwater. This project will also have negative impacts on other water users in this catchment. Bongani Minerals (Pty) Ltd will have to apply for a water use licence to this department. The applicant will have to convince this Department why a licence should be granted and how negative impacts will be mitigated. Please note that the application for an Authorisation must be made in terms of sections 21 (c), (i) and (j) of the National Act (Act 36 of 1998)A thorough water quality management plan will have to be provided to this Department as part of licence application.	1. The National Water Act definitely forms part of the Mining Right application, as approval by DWAF for a number of activities will need to be provided. Mention of the National Water Act is contained in the Draft Scoping Report. The fact that no mention of the National Water Act was made in the power point presentation at the meeting was done to reduce the time of the presentation. 2.An application with all the requirements will be made for water use licence from DWAF. All the appropriate specialist consultants have been appointed to address all the issues raised by DWAF and other IAPs. The results of these studies will be contained in the EIA report. The appropriate specialist will contact DWAF for the necessary approvals.
RESPONDING IAPS: **1.** IAP (30 April 2009) 2. DWAF (5 June 2009)			
5. Prosegeral issues	5.5 Lack of Contact with Authorities, especially DEA&DP and DEAT	1.The IAP is concerned that Department of Environment and Tourism (DEAT) has not been notified of the application, especially as the Verlorenvlei is a Ramsar site, which is under the jurisdiction of DEAT. The Ramsar site has international ramifications as it is one of the UNESCO programmes.	1. The fact that DEAT had not been informed of the Mining Right Application was an oversight of the EAP. DEAT has been informed of the Scoping Process. No comments have been forth coming from DEAT to date. DEA&DP will be informed of the Mining Right application in terms of a NEMA application that still needs to be submitted to them.
RESPONDING IAP: 1. Philippa Huntly (30 April 2009); IAP (30 April 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.6 Controlling Authority for Mining Operation	1. Who will take responsibility that the mine does not pollute the environment during its operational and closure phases?	1. DME and DWAF will be responsible for checking that the operation of the mine (and during mine closure) does not cause any pollution. Bongani Minerals will need to monitor whether pollution is taking place in accordance with their approved EMP. Such monitoring also needs to take place long after mine closure. DEA&DP will also monitor any pollution in terms of NEMA (as they will also need to provide a ROD for the mine).
RESPONDING IAP: 1. IAP (30 April 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.7 Controlling Authority for Land Use	1. If the application for temporarily rezoning is submitted to the local Municipality, what will your recommendation be, given that there is so much opposition to the proposed mine? 2. What would happen if the Municipality rejects the rezoning application because of the many complaints received against the mine from the community? 3. In terms of the Land Use Planning Ordinance, 1985 (Ordinance 15 of 1985) no person shall contravene or fail to comply with the provisions incorporated in a zoning scheme compelled in terms of Ordinance 15 of 1985. The subject property is located in an area where the Scheme Regulations compiled in terms of Section 8 of Ordinance 15 of 1985 are applicable. The subject property is currently zoned Agricultural 1, which does not make provision for mining. Mining activities are accommodated as the primary use of Industrial Zone 3. The subject property will therefore have to be rezoned in order to legally operate a mine. Alternatively application can be made in terms of Section 15 of the Ordinance 15 of 1985 to utilise the agricultural zoned land, on a temporary basis, for mining activities. Mining activities must furthermore comply with the policy guidelines contained in the Berg River Municipality Spatial Development Framework (approved in terms of the Municipal systems Act, 2000 via Council Resolution R8 730 of October 2008).	1. Firstly WEC are not responsible for the submission of the LUPO application to the Berg River Municipality. Bongani Minerals would need to appoint a consulting Town Planners to prepare and lodge the application. It should be remembered that conclusions and recommendations cannot be drawn or made at this point in time as the results of the specialist studies still need to be completed. Should it be found from the results of the specialist studies that potentially significant impacts cannot be sufficiently mitigated, then the EAP will put such conclusions in his recommendations. It will, however, be up to the various approval authorities to make their required decisions based on the information provided to them. The Municipality would not base their decision only on the number of objections of the many IAPs into consideration, but would need to firstly consider what the merits of the objections were, as well as take the merits of the application as an integrated whole into consideration (i.e. strive for sustainable development). 2. Refer to 5.7.1 above. 3. Refer to 6.7.1. A temporary rezoning application to mine for a period of ± 20 years will be made by the Berg River Municipality.

RESPONDING IAP:
1. IAP (30 April 2009)
2. IAP (30 April 2009)
3. Munisipaliteit Bergrivier Municipality (26 May 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
5. Prosegeral issues	5.8 Non- compliance with the Mineral and Petroleum Resources Development Act (MPRDA) Regulations	1. Non-compliance with Regulations 46 and 49 of the MPRDA Regulations, particularly in its failure to identify and describe the consequences of not proceeding with the proposed mining operation. 2. Land-use of the affected area is well established, with the livelihood of many existing businesses and workers dependent on existing land-use, namely agriculture. It is particularly problematic that alternatives to the proposed mine, and the many positive consequences of not proceeding with the mine, are not identified and described as required by the Regulations. This means that the Department is not provided with all relevant facts to make a decision on this application. This non-compliance with Regulation 49 taints the remainder of the DSR by ensuring inadequate and misleading representation of the facts applicable to the proposed mining area through omission of relevant information. 3. Regulation 46(a) requires the Social and Labour Plan (app7) to contain *''a preamble which provides background information of the mine in question''.* Appendix 7 contains no such preamble, and no information at all on the mine or the mining company itself. It is therefore submitted that the DSR itself is non-complaint with both Regulations 46 and 49 and should be rejected on this basis alone. 4. Inadequate notice and public consultation to date. The procedure followed thus far has not provided IAPs with the sufficient notice and time for meaningful consultation in accordance in accordance with Regulation 3 of the MPRDA Regulations.	1. The so called "no-go" option was included in the DSR. The Revised Scoping Report refers in more detail to the Alternatives to be considered 2. The alternatives put forward in the RSR will be assessed fully in the EIA phase. 3. The Social and Labour Plan formed part of the Mining Right application which was approved by DME. A full Socio-Economic Impact Assessment will be undertaken in the EIA phase of the project 4. Refer 5.2.1 above.
RESPONDING IAPS: 1. Verlorenvallei Coalition (1 June 2009) ; CG de Wet (25 May 2009) 2. Verlorenvallei Coalition (1 June 2009); CG de Wet (25 May 2009) 3. Verlorenvallei Coalition (1 June 2009) ; CG de Wet (25 May 2009) 4. Verlorenvallei Coalition (1 June 2009); F&PA van Bart (31 May 2009); CG de Wet (25 May 2009); AM Grutter (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6. 1 Issues regarding the EMP	1. Referring to page 5 of the EMP. The last line states "The EMP which had been submitted on the 18th of October 2006". The EMP submitted on 18 October 2006 did not contain page 18a – a diagram containing three proposed holes in the ROAD RESERVE. This page 18a miraculously found its way into the (already accepted) EMP in January 2007 – one of Bongani's second PR application's MANY fatal flaws. (An original copy without p18a can be viewed at Candice Meyer's office at Webber Wentzel Bowens in Cape Town). This is part of the reason why Bongani's second PR application was subject to Judicial Review. (That was never heard in court due to the fact that, despite assurances to the contrary, DME accepted Bongani's MR application somewhere between 10 and 25 March 2009.) We find this situation very disturbing, because when DME gave us these assurances on 26 February 2009, they would already have been in possession of Bongani's Social and Labour plan. Our rights in this matter are reserved. 2. Unacceptable for Bongani Minerals Pty Ltd to refuse I&APs access to crucial information regarding the mining process, ore analysis and estimated water use. Without this information, IAPs cannot assess the potential impact on water resources; the risk of water pollution through the leaching of metals; or the financial viability of the proposed mine.	1. The EMP referred to deals with the Prospecting Right which has nothing to do with the Mining Right Application which will have its own EMPR and EMP. Refer to 5.1.5 and 5.3.4 above. Please also note that in terms of Section 22 (2) of MPRDA "the Regional Manager must accept an application for a mining right if .....". 2. Some of this information is provided in the Revised Scoping Report which IAPs will have a further 30 days to comment on. Additional information regarding specialist studies will be made available for comment in the Draft EIA Report.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6. 1 Issues regarding the EMP (continued)	3.Mineral Resources Upon review of the available documentation it strikes me as unprecedented that a Mining Right Application could be contemplated when very little information is known or disclosed pertaining to the geology of the Riviera granite and surrounding wallrock, and the distribution of the related W-Mo mineralization. The 23-page extended abstract of Walker (1983) appears to be the single and only primary source of sketchy geological information related to the mineralization. That work was never peer-reviewed, nor is there any independent verification of the "mineral reserve" reported there-in (Walker, 1993, p.13) and subsequently cited in Rozendaal et al (SA Journal Geology, Vol. 97, pp 184ff, June 1994) and the SRK Consulting report "Riviera Tungsten Groundwater Impact Assessment". The information regarding W-Mo mineralization currently available cannot be considered remotely compliant with SAMREC, JORC or equivalent internationally-accepted code for reporting of mineral resources. As an IAP and a P. Geo. I am hereby demanding: 2.1: public disclosure of a mineral resource for the properties affected, declared to SAMREC or equivalent reporting code, and clearly signed off by Competent or Qualified Persons (CP or QP) 2.2: alternatively, documentation that a SAMREC*-compliant mineral resource is to be declared in future, plus disclosure by the Applicant of anticipated exploration activities and related exploration budget to support a resource declaration *SAMREC = SOUTH AFRICAN CODE FOR REPORTING OF MINERAL RESOURCES AND MINERAL RESERVES. Promulgated March 2000 under the auspices of the South African Institute of Mining and Metallurgy	3. The Mining Right Application is based on the original results obtained by Union Carbide and Anglo American from their very detailed exploration programme. It should be noted that this joint partnership were on the point undertaking a bulk sample by sinking an inclined shaft into the ore body before the price of tungsten fell dramatically. No mining company would spend millions of Rands on hearsay or a ‘’25 page extended abstract’’. Additional hydrogeological and geotechnical studies will be undertaken during the EIA phase. Refer to the two specialist reports undertaken by Venmyn Rand and EMC dated February 2009.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
RESPONDING IAPS: 1.Namaquasfontein Boerdery Trust (1 June 2009), Kromantoniesrivier Bewarea (1 June 2009); EBEDAG (1 June 2009) 2.Verlorenvallei Coalition (1 June 2009) 3. H Grutter (29 May 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6.2 NEMA and the EIA process	1. The DSR makes no mention of the environmental management principles contained in Section 2 of NEMA. The MPRDA explicitly makes itself subject to those principles in its Section 37 (1)(b), and provides that the principles apply to all prospecting and mining operations and any matter relating to such operation; and serve as guidelines for the interpretation, administration and implementation of the environmental requirements of the MPRDA. 2. It is my understanding that a full EIA is required in terms of Regulation R385 and WEC has been appointed by Bongani Minerals (Pty) Ltd to conduct such an assessment. With reference to Para 1.1 of the Scoping Report it is stated that a second EIA process is required in terms of NEMA and that **this** process will run separately to the MPRDA process (p.2). Para 1.4 (p.5) states that "WEC were also appointed to undertake an EIA process in terms of NEMA". This is totally unacceptable to me. It is obvious that the WEC Consultant/s conducting such an EIA will find it difficult to be unbiased as Bongani Minerals is funding the process. Without a second and independent Consultant's opinion, the findings in the WEC report will go unchallenged and as such will favour Bongani Minerals (Pty) Ltd's case As an IAP, as well as being a taxpayer, I expect that the DME appoint their own consultant to conduct a separate and independent EIA as required by NEMA. It is stated on page v of PLAN OF STUDY FOR EIA AND EMP that impacts are "predicted for the purposes of a qualitative impact analysis (the expected severity of impacts and the level of confidence required in their prediction), which will guide the planning of the Proposed Riviera Open-Cast Mining Project." I am of the opinion that these predictions and resulting guidelines for the planning of the project are of such extreme importance, that it cannot justifiably rest only with one Consultation company.	1. The applicable NEMA Principals have been included in the RSR. 2. Two full EIA processes will be run: one in terms of MPRDA and one in terms of NEMA. All the relevant information at the disposal of the EAP must and will be disclosed. The EAP is independent and does not write "sweetheart" reports.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6.2 NEMA and the EIA process (continued)	Given the fact, that Mr Aubrey Withers were allegedly found to be trespassing on private property recently, it creates doubt to the integrity of the entire scoping process and also undermines the much required "level of confidence" in Mr Withers. 3. We are concerned about the financial effects for WEC. Based on desktop research it would seem that WEC is a small environment consulting company with the result that a project of this size would result in the WEC being financial dependant on Bongani Minerals (Pty) Ltd ("Bongani") which may make it impossible for them to make objective recommendations in this regard. 4. In terms of the country's legislation, in particular co-operative governance, it is submitted that reports from each process should be released for public review at the same time and that IAPs can reasonably expect the two authorisation processes to run in parallel, to obviate the situation where one authority is pressurised into a decision because another authority has already decided. a)When is WEC intending to initiate the EIA process in terms of NEMA? b) Will the two authorisation processes run in parallel and if not, why not? 5. We submit that appointing the same firm, even if they are an independent environment consulting company, for both studies is a blatant breach of good corporate governance principles as documented in the various King reports on Corporate Governance. As such we would require that a different firm be appointed to perform one of these studies. In the event that a separate firm is not appointed, at the very least, a completely separate team should be engaged to complete the different assessments to ensure that there is the required objectivity.	3. WEC is known in the industry for not writing "sweetheart" reports (refer to 6.1.1 above). Please note that the information and conclusions and recommendations contained in the report are made based on the information received from specialists. 4. Please note that DME and DEA&DP make decisions autonomously and in terms of completely different sets of legislation. Whilst DEA&DP need to comment on the MPRDA in terms of co-operative governance, their decision making is independent of each other. The NEMA application will be launched towards the end of July 09. Since the time frames specified for the two processes are different, they will not run parallel with each other. 5. Since the two processes are so similar, very little core information will change. In addition, the specialist studies will be the same for both processes. It therefore seems superfluous to have two different EAPs for the two processes.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6.2 NEMA and the EIA process (continued)	The draft scoping report includes details about the size of WEC and indicates (on pg 7) that four professional staff support Mr Withers. Based on this information it would seem unlikely that separate teams could be used for the different studies. 6. The DME has given Bongani Minerals **6 months** to present their EIA. A number of specialists quoted in the Draft Scoping Report have indicated that they would need a minimum of **1 year** to do adequate baseline studies and collect sufficient relevant data to make informed recommendations. How do Bongani Minerals and WEC propose to solve this conundrum? Is it possible that the applicant will short-cut the EIA process in order to comply with DME regulation?	6. Unfortunately, the MPRDA only allows for 6 months to produce the final EIA report. This is a failure of the Act as it is impossible to complete certain specialist studies within this time frame. An extension of time will be applied for from DME for producing the Final EIA Report.
RESPONDING IAPS: 1. Verlorenvallei Coalition (1 June 2009) 2. L. Pieters (29 May 2009); CG de Wet - Uitsig (25 May 2009) 3. CG de Wet - Uitsig (25 May 2009) 4. AM Grutter (1 June 2009) 5. CG de Wet (25 May 2009) 6. AM Grutter (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6.3. National Environmental Management Biodiversity Act (NEMBA)	1. How can it be assumed that the mine will not have far reaching effects on nationally protected plants over an area far larger than the footprint of the mining operation? 2. On page 3 of the DSR, it is stated that "[i]t is not expected that the footprint of the proposed Open-Cast mine will impact on any nationally protected vegetation types." Firstly, it is important to note that the actual "footprint" of the mine is 555 ha, which is the total "mine lease area" required for the pit area and all the structures and facilities associated with the mine, including waste dump, slimes dam and plant area (DSR page 4). Secondly, members of the Coalition report sightings in the Verlorenvallei of a number of species listed on the Threatened and Protected Species lists issued under the National Environmental Management Biodiversity Act, 2004 (Act 10 of 2004), 3. According to your Environmental Evaluation (Section 5) potential impacts on flora and fauna, and freshwater ecosystems appear to be most significant, yet, this appears to be contradictory to what is said in Section 1.2.4 dealing with NEM: Biodiversity Act. In addition, the Biodiversity Act provides for 'the protection of species and ecosystems that warrant national protection' (viz the Verlorenvlei estuary, protected under the Ramsar treaty).	1. Very little natural vegetation will be directly affected by the actual mining. Whilst some dust pollution is expected, the significance of the dust should not have any impact on the surrounding natural vegetation. The potential impacts of the mine on ground and surface water will be assessed in the EIA phase. 2. Refer to 6.3.1 above. 3. All the relevant legislation protecting ecosystems will be taken into account by the specialist appointed to undertake studies in the relevant disciplines (vegetation, freshwater ecology, fish, birds etc.).
RESPONDING IAPS: 1. F. Strange (23 May 2009); C. Gelderblom (25 May 2009) 2. Verlorenvallei Coalition (1 June 2009) ; AM Coetzee (31 May 2009) 3. AM Grutter (1 June 2009)			
6. Legislation	6.4. National Environmental Management: Air Quality Act (NEM:AQA)	1. The DSR fails to record that the metallurgical plant would require an atmospheric emissions licence under the NEM:AQA, 2004 (Act 39 of 2004). As at the date hereof, the Coalition has not received formal notice of any such application. AQA also imposes other general legal obligations in relation to air quality, including emissions to air from mining and metals processing.	1. The tungsten metallurgical plant does not require smelting. It is a chemical plant and therefore no emissions will be released to the atmosphere. Dust monitoring will be undertaken.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
Verlorenvallei Coalition (1 June 2009)			
6. Legislation	6.5 National Environmental Management: Waste Management Act (NEM:WMA)	1. The DSR fails to record that both the mine and the metallurgical plant would require a waste management licence under the NEM:WMA, 2008 (Act 59 of 2008). The WMA also imposes other general legal obligations to waste generation and management. As at the date hereof, the Coalition has not received formal notice of any such application	1. A waste management license will be applied for in due course. Discussions will be held with the Berg River Municipality.
Verlorenvallei Coalition (1 June 2009)			
6. Legislation	6.6 Environment Conservation Act (ECA	1. The DSR lists the ECA, 1989 (Act 73 of 1989) as part of the legal framework applicable to the proposal, but fails to mention that this act has been repealed by the WMA, which comes into effect on 1 July 2009.	1. The Scoping Report was produced before 1 July 2009 and could thus not note an Act that was not in effect at the time. This will be updated in subsequent reports.
Verlorenvallei Coalition (1 June 2009)			
6. Legislation	6.7 Land Use Planning Ordinance (LUPO)	1. On page 45 the DSR refers to a ''temporary change in land use'' from Agriculture Zone 1 to Industrial Zone II in terms of the Land Use Planning Ordinance, 1995 (Ordinance 15 of 1985) to operate the mine. Presumably this ''temporary change'' is in fact for the life of the mine, i.e. 18-19 years. As at the date hereof, the Coalition has not received formal notice of any such application to the local authority.	1. Changes in land use will be applied for in due course by the appointed town planners.
Verlorenvallei Coalition (1 June 2009)			
6. Legislation	6.8 Ramsar International Convention on Wetlands	**1**. The Convention on Wetlands of International Importance (commonly known as the Ramsar Convention) came into force on 21 January 1975 and provides a framework for the conservation and wise use of wetlands and their resources. These are presently 118 contracting parties (including South Africa, who became a member on 12 March 1975). The DSR, however, neglects to mention this international treaty under the section ''Legal and Policy Framework.''	1. Will be updated.
Verlorenvlei Coalition (1 June 2009) ; AM Grutter (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
6. Legislation	6.9 National Water Act, 1998 (Act 36 of 1998)	1. The National Water Act, 1998 (Act 36 of 1998) is noted as having bearing on the project under "Other Legislation (point 1.2.6). Given that the scoping report highlights a number of likely and significant impacts on surface and ground water, both in terms of quality and quantity, it is crucial that these issues are treated as being of utmost importance – and the provisions made within the National Water Act be referred to more thoroughly in the scoping report.	1. Noted
1. WESSA (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
7. Heritage	7.1 Impacts of the proposed mine on heritage resources	1. The Coalition is perturbed by the fact that the DSR describes the potential impacts of the proposed mine on heritage resources as 'low'. This conclusion has been reached despite not even a desktop review having been done on existing heritage and archaeological resources in and around the affected area (in compliance with Regulation 49 (1)(d)). In fact, Coalition members are aware of the fact that there are plenty of San sites along the southwestern shore of the Verlorenvlei mountains. 2. Mine activities could cause damage to the natural history and San culture heritage of the Verlorenvlei district. 3. How can the existing agricultural pursuits reduce the impact of the proposed mining operation on as yet unexplored sites? Our historical and archaeological sites are not a resource but a legacy. 4. A report from appropriate heritage experts is recommended, including input from Heritage Western Cape 5. I personally would like the word 'resource' stricken from the current usage dictionary. A resource implies something to be 'mined' or 'exploited' … this is consistent with 20th century thinking. I would remind the applicant and the consultants that aspects of heritage such as buildings rock paintings and hidden civilizations or cultures; are not resources to me mined or exploited, but living records of life on earth to be treasured and protected from the depredations' of mankind's greed. Will the study show this? Would the San people agree to the records of their ancestors being desecrated? Will the consultants ask them? 6. One of my concerns is that the valuable San rock paintings in caves near to the pit excavation will be damaged by rock falls as a direct result of the seismic affects of blasting. It is my contention that this cultural heritage must be preserved and whatever measures are required must be implemented including total removal and relocation if necessary.	1. A heritage and archaeological assessment will be done in the EIA phase. The well known sites on the shores of Verlorenvlei will not be affected by the mining operations. 2. Refer 7.1.1 above. 3. Refer 7.1.1 above. It is hardly likely that deeply buried archaeological sites will be found in alluvial material (high energy environment). Certainly ploughing disturbs surface archaeological sites. 4. Refer 7.1.1 above. 5. Refer 7.1.1 above. 6. An Archaeological impact assessment will be undertaken. It is highly unlikely that blasting will affect rock paintings on the Piketberg to the east.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
7. Heritage	7.1 Impacts of the proposed mine on heritage resources (Continued)	7. The proposed location of the tungsten mine is in an area renowned for its links with the pre-colonial past. The Piketberg and surrounding mountains stretching to the sea at Eland's Bay contain many hundreds of archaeological sites, many of which have not yet been fully excavated or mapped. The mountains and valleys of the area were the homes and shelters of people for tens of thousands of years, possibly even for hundreds of thousands of years, as excavations in the Cederberg and Eland's Bay have revealed. This heritage, including all rock art sites in the area, is a national asset deserving the highest level of protection and conservation. Mining activities are antithetical to the conservation of these sites. We urge the officials, when determining the merits of this application, to consider the consequences of losing these irreplaceable links to the distant past for the sake of a mine with a projected life span of 18 – 20 years.	7. Refer 7.1.1 above.
Responding IAPs **1**. Verlorenvallei Coalition (June 2009); F. Strange (23 May 2009) **2**. J. Jafta; H. Jafta; M. Jafta; F. Jafta; B. Loff; G. Klase; M Blankenberg; J. Titus; J. Boois; A. Boois; P. Swanepoel; M. Swanepoel; Gerda de Villiers; M. Karolus; S. Boois; R. Boois; T Swanepoel; D. Karolus; G Karolus; C. Klaasen; L. Karolus; M. Booysen; J. Booysen; J. Swanepoel; A. Swarts; K. Blankenberg; F. Blankenberg; I. Van Rooy; J. Taylor; A. Fortuin (24 May 2009); C. Wesselink (20 May 2009) ; S. Hunter (1 June 2009); W. Fourie (2 June 2009); S. Jeffery (22 May 2009); S. van der Merwe (25 May 2009); PJ Pieters, GS Thomas, MT Johnson, R Cox, C Gradidge, PJE Strauss, JE Paton, RC Cloete (24 May 2009); T&T vanderhaeghen (26 May 2009); M&J Thomson(28 May 2009); L &K Smith (1 June 2009); H. Visser; F. Visser, D Visser (26 May 2009); IC Kotze (24 May 2009); M Burger (29 May 2009); J Laubscher (29 May 2009); M Pienaar (30 May 2009); M Lewarne (25 May 2009); B Clark (25 May 2009); A Ashwell (25 May 2009); S Fazel- Ellahi (25 May 2009); K Paulse (25 May 2009); A Smith (1 June 2009); R Stewart (24 May 2009); V Strydom (24 May 2009) G Allderman (21 May 2009); J van der Merwe (June 2009) **3**. F. Strange (23 May 2009) **4**. WESSA (1 June 2009) **5**. N Taylor (25 May 2009) **6**. B. Anderson (1 June 2009) **7.** EBEDAG (1 June 2009)			

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
7. Heritage	7.2 Palaeo Ecology	**1**. IAP have been involved in research into the late Quaternary palaeo-ecology of the wetland and it is clear from our studies that the system is already highly modified from its pre-colonial farming situation and that it is very vulnerable to further degradation. **2**. The sediments of the entire Verlorenvlei are a rich storehouse of palaeo ecological history and of immense scientific value. This valuable natural asset must be preserved and not threatened in any way whatsoever. The type of mining activity envisaged in this application is of a highly invasive nature and could cause irreparable damage to the Verlorenvlei. I consequently believe that it is absolutely necessary to widen the scope of the investigations to include a full depth investigation into the palaeo ecological issues and the possible damage that the proposed mine may have on this cultural treasure.	1. A heritage assessment and an archaeological assessment will be undertaken in the EIA phase. 2. The Verlorenvlei is 35 km to the northwest of the proposed mine. The proposed mine will therefore not impact on the palaeo-ecology of the vlei. It will therefore not be necessary to study the palaeo-ecology history of the Verlorenvlei.

Responding IAPs:
1. Prof M. Meadows (5 June 2009)
2. B Anderson (1 June 2009)

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
7. Heritage	7.3 Rehabilitation and surety	1. The proposed mine is an intrusion into a well ordered and successful community with an excellent track record in social consciousness and responsibility. In addition the visual setting is to say the least – stunning! If this mining company wish to persist with this application and heaven forbid they are finally granted approval then it is incumbent on them at the end of the mining operation to reinstate the entire area to precisely the condition they found it in. This would include inter alia ; • Refilling the mine pit with the dumped overburden and any additional suitable material required to return it to its original ground level and the planting and maintenance of suitable vegetation. • The removal of the slimes dam and contents to a suitable waste disposal centre e.g Vissershok Hazard Disposal Site. • The complete neutralisation of the slimes dam site and the planting and maintenance of same with approved vegetation • The demolition of all buildings of the processing plant including the concrete floor slabs and foundations and removal of same to a suitable waste disposal centre. • The demolition of any other buildings on the lease property erected by Bongani minerals not contaminated with chemical waste and removal of all rubble to an approved dump site. • The entire site of the mine lease to be reinstated to the original condition in which it was found. • The settlement of all claims for compensation by all parties suffering from health ailments caused by the mine operations • Any other issues of reinstatement not mentioned above. It is estimated that the cost of the above reinstatement will be in the order of R 0.75 Billion. In terms of the regulations Bongani Minerals are required to pay the assessed amount to the Department of Minerals in full prior to commencement of any mining operations to be held in an interest bearing account pending complete and approved reinstatement and only thereafter will the amount with interest be reimbursed.	1. A surety payment will be made to DME by Bongani to ensure rehabilitation. A mine closure plan will also be submitted to DME for approval. The open cast mine will not be refilled. The mine dumps and slimes dams will be rehabilitated according to the closure plan.

	KEY ISSUES	IAP COMMENT	WEC RESPONSE
7. Heritage	7.3 Rehabilitation and surety (continued)	2. A surety from the companies are worthless as they can be closed down or go bankrupt/or the directors/shareholders can simply disregard their responsibilities which is one of the reasons why the world is so polluted (see article by Blacksmith NY - 600 million earths). It is imperative that the companies issue a Bank Guarantee backed by the Directors/Shareholders which must be inflated yearly for any future clean-up. (The Directors/ shareholders must underwrite the guarantee and it must be in force for at least ten years after the mining stops. (See paragraph5 of Blacksmith article attached- Flow rate variations- I have marked it "A".) Refer to W.E.C. Response(Public Participation Table6) Item4 .6 page6 (April2009	2. Such guarantees have to be made by the mining company before mining may begin. The Directors of the company are held liable for any damage, pollution that may be caused as a result of mining.
1. B Anderson (1 June 2009); AM Grutter (1 June 2009); HC Schmidt (7 May 2009) 2. E Krause (25 May 2009)			