

The Regional Manager
Department of Minerals and Energy
Private Bag X9
Rogge Bay
8012
South Africa
30th May 2010

Dear Sir / Madam

**RE: Environmental Management Plan: Riviera Tungsten project, Reference:
WC30/5/1/1/2/434PR A/2010/03/26/001**

On 27th July, I was registered with the Verlorenvlei Coalition, which qualifies me as an Interested and Affected Party (IAP) with regard to the application by Bongani Minerals to procure prospecting rights for the Riviera Tungsten Project in the Piketberg magisterial district.

I have reviewed the documents pertaining to the Environmental Management Plan available at the download section of the WEC website, and I have reviewed the submission made by Dr. H. S. Grütter in regard to the Environmental Management Plan in question. I too, am an economic Geologist by profession, and I wholeheartedly endorse Dr. Grutter's excellent assessment of the EMP and the concerns that he has raised. His is clearly a very professional and expert opinion that leaves nothing unsaid.

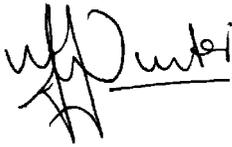
However, I would like to comment on a number of less technical issues that I find rather alarming –

1. The EMP makes no provision for compensating landowners for the loss of the use of their land during the prospecting appraisal phase. The areal extent of the ore body to be appraised is not large, and the Prospecting Work Programme envisages that some 160 boreholes will be drilled. Such intense drilling activity will render the affected area un-useable to the landowner for the duration of the appraisal programme, and probably for a considerable period thereafter. And yet, incredibly, the EMP envisages no compensation? Does this indicate a profound lack of understanding of what an appraisal programme of this nature involves? Does this indicate a profound disregard for the socio-economic environment in which Bongani intends to do business? In my opinion, unless Bongani makes a dramatic re-assessment of this issue, what they propose to do is simply unconstitutional.
2. Does Bongani's underestimation of the water consumption for drilling operations similarly indicate a lack of understanding of what is involved, or does it indicate a complete disregard for the environmental impact of a high water consumption?
3. The fact that provision for the rehabilitation of drill-sites appears to be hopelessly inadequate is equally alarming. As an IAP, how can I be assured that Bongani has the financial capability to adequately rehabilitate 160 drill-sites? Is the underestimate indicative of a lack of understanding of what is required in terms of

- rehabilitation or is it a statement of intent to cap rehabilitation costs at an inadequate level?
4. Without detailed and defensible plans of envisaged drill-site layouts, it is not possible to gauge the environmental impact of drilling operations and consequently flies in the face of statements about the management of the environmental impact of such operations.

In conclusion, there are sufficient fundamental shortcomings in the EMP to warrant a rejection out of hand.

Yours sincerely,



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