

**Friends of the Haenertsburg Grasslands**

P.O.Box 174  
Haenertsburg  
0730

30 May 2008

Jan Phelan  
Plan-It with enviro care  
P.O. Box 25,  
Howick, ]  
KZN, 3290

Re: Raising concerns: Application from Ndowana Exploration Two (Pty) Ltd to extend prospecting operation in the Haenertsburg Area

As the Chairperson of Friends Of The Haenertsburg Grassland (FROHG) and representative for a number of members of the Haenertsburg community I would like to raise concerns as listed in Annexure A to this letter. Please acknowledge the receipt of these concerns.

Further I want you to acknowledge that these concerns are by no means complete and I firmly insist on being given the opportunity to raise more concerns before your EIA assessment report is completed. In this regard your public meeting held on the 22<sup>nd</sup> May was entertaining but did not give us sufficient detail to properly understand what Ndowana Exploration Two (Pty) Ltd plans to do. In order to effectively participate in the public participation process and to identify all concerns we need to fully quantify the range of actions that might take place. We are a membership based organisation and the concerns listed below have been raised various members. However 7 (seven) days is simply not long enough for members of the community to research, apply their minds and bring forward all relevant issues.

Consultation must be seen as more than a mere opportunity that you give to us, as an interested and affected party, to make ineffective representations. In order for us to effectively raise concerns we will require the following documents and information:

1. All and any documentation of any nature whatsoever which pertains to the application for prospecting rights referred to above; including but not limited to the following:

1.1. all and any correspondence between the Ndowana Exploration Two (Pty) Ltd, and the joint venture partners, and the DME or DEAT;

1.2. all and any correspondence which bears any reference to is ancillary to or refers in any way to the above mentioned application;

1.3. the application form including the appendages;

1.4. all file notes, memoranda or internal documentation pertaining to any decision made in respect of the application;

- 1.5. the draft Environmental Management Plan and all Annexures, including but not limited to the prospecting works program and ancillary documentation pertaining thereto as referred to in the MPRDA regulation 7;
  - 1.6. all and any notices, publication or advertisements to include but not limited to those published in any Gazette, placed at any Magistrates' Court and any local or national newspaper circulate in the relevant area;
  - 1.7. all and any notices, publications or advertisements informing all interested and affected persons of the public meetings to be held in terms of the MPRDA or the NEMA regulations and the minutes of all public meetings held in terms of the aforementioned acts.
2. All and any documents and/or correspondence relation to any request or enquiry received by any person or entity pertaining to the submission of the abovementioned application.
  3. All and any documentation indicating whether any application for a prospecting or mining right has previously been granted or refused in respect of the area within 100km of Haenertsburg.
  4. Comprehensive information on prospecting activities. Your briefing document and the information provided at the meeting did not give us sufficient detail. Statements to the effect that you will only know the full scope of activities once you have started work is not helpful for us to understand the potential impact. Please can you give us specific figures for the expected scope as well as the maximum possible scope for the following in writing:
    - 4.1. How much water will you use at different stages in litres. Also the rate as in litres per day?
    - 4.2. From where will water be sourced? We need more detail than "It will be purchased from the nearest source."
    - 4.3. How will water be delivered, how often and where, how will water be used?
    - 4.4. How many drilling rigs will you use – narrow diameter & large diameter?
    - 4.5. How operating days for drilling rigs – narrow diameter & large diameter – in total and per month?
    - 4.6. How many other vehicles will be involved? Size of trucks and other vehicles? How many trips – per day and per month?
    - 4.7. How many pits, dumps, cores, etc will be dug and where? Your briefing document touches on this but it is not possible to quantify the impact from that information. How many Kimberlites are there or how many do you anticipate?
    - 4.8. How many staff will be employed at different stages and for how long? How will they access their workplace and how often?
    - 4.9. What is the expected time line for different activities? How long could activities continue? How often?
    - 4.10. Is there a possibility of operations taking place at night?

5. Details of the rehabilitation plan and the rehabilitation quality standards Ndowana and their joint venture partners are prepared to commit to. For instance, will you fill in and rehabilitate drill holes & prospecting pits afterwards? Will you retain top soil separately for the purpose? Will you provide for on going interventions in subsequent years to control invasive aliens? What will you do with drill tailings? What will be the visible effects on the site after you have gone?
6. Any existing or preliminary biological studies of which you are aware. You indicated there was a preliminary the Flora & Fauna study (a.k.a. Peter Winter's report). This could be helpful.

I trust you find the above in order and await the documentation and/or information as requested above in order for us to meaningful and effectively participate in the public participation process.

Regards,

Ian Burman  
Chairman - **Friends of the Haenertsburg Grasslands**  
Tel: 083 266 5579

# **Annexture A**

## **1. Basic assessment vs Full EIA**

We note that, with reference to the National Environmental Management Act (107 of 1998), although activities mentioned in Listing 1 require a minimum of a Basic Assessment the regulations explicitly envisage situations where such activities would require a full scoping and EIA process. Since the your demarcated prospecting area and immediately adjacent land includes extremely sensitive, threatened and irreplaceable biome a full EIA would be appropriate in this case.

## **2. Why start if you can't finish**

From the limited information you have provided so far it is clear that the prospecting activities contemplated would substantially and permanently disturb that environment. It seems highly likely that water and environmental issues would preclude there ever being a mine established at that location. It is thus inappropriate to consider the impact of the prospecting in isolation. A full EIA looking at the impact of a mining operation should be done. If that concludes that mining cannot proceed then there would be no point in damaging the environment through prospecting. If it did show mining as possible then you would have your way with us.

## **3. Biological studies inconclusive in winter**

Yourself and others have raised the need for biological studies into vegetation, insects, reptiles, amphibians, bird life & other fauna. We endorse this. However we are most concerned at your suggestion that such studies could be completed by August this year. Winters are cold and dry here – life in all forms shrivels, hibernates and dies back at this time. Studies done at this time will certainly miss critical information. The studies must be done through the complete spring and summer growing period.

## **4. Access routes:**

Many people are concerned about the impact of accessing the site. Access routes, frequency and types. For example footpaths, access and tracks causing compaction and crossing the sensitive grasslands biome, and access routes around the grasslands potentially affecting vulnerable species and creating disturbance for local residents. Also the potential for degradation of existing roads & tracks.

- Are you prepared to upgrade the route from top Annie Fortune road via Forest glen for access?
- Would you consider building a road via Dornhoek 1080 / Bloemhoek / Annies Fortune?

## **5. Impact on bio-diversity**

We are concerned on the impacts of the prospecting and exploration activities on biodiversity. The remaining land area covered by the once large granite grasslands has declined dramatically over the past century. Many species in this biome are extremely vulnerable to population decline and extinction due to disturbances in and around the ecosystem, and due to habitat destruction. These activities include any access to the grasslands that causes soil compaction; any changes in water use and water courses used by the grasslands species including fauna that use both grassland and forests; any soil disturbance which allows alien invader species to colonise the grassland areas; and any noise and human activity that disturbs the habitat of the endangered blue swallows and other vulnerable species.

## **6. Other Considerations**

- What about hydro-geological study? – Drilling operation could disturb sub-surface water flows & springs.
- What potential for pollution of the catchment?
- What about a reptile study? – endangered skenks & others in the area.
- What about impact on Blue swallows?
- What about impact on Wolkberg Zulu butterflies?
- Noise pollution – cumulative effect of your operations combined with existing timber operations and other potential prospecting by Southern Era or others?
- Tourism economy impact?