

**DRAFT SCOPING
REPORT
COMMENTS**

**VELDDRIF
CHAMBER OF
COMMERCE**



Posbus 189, Velddrif, 7365 - Navrae: Liza 084 207 0193 - liza@velddrif.info / chris@velddrif.info

12 February 2019

Ms Christine Fouche
Senior Environmental Consultant
Greenmined
De Beers Avenue
Somerset West

Dear Madam,

Re: Formal statement i.r.o. opposition to the proposed mining rights application impacting Verloren Vlei:

Following our previous correspondence the Management Committee of Velddrif Chamber of Commerce submit the following comments;

- Verloren Vlei is commonly known to be a ecologically sensitive area.
- Currently this area as well as its catchment area suffer severe water shortage due to drought conditions.
- Establishment of any mining activities anywhere in this area activities is foreseen to rather increase negative influence on water availability and contribute to pollution in this very sensitive ecosystem.
- Our questions are:
how the developer intends to address the 17 Sustainable Development Goals individually, in respect of local & surrounding inhabitants as well as the environment listed as follows;
 1. No Poverty
 2. No Hunger
 3. Good Health & Wellbeing
 4. Quality Education
 5. Gender Equality
 6. Clean Water & Sanitation
 7. Affordable & Clean Energy
 8. Decent Work & Economic Growth
 9. Industry, Innovation and Infrastructure
 10. Reduced Inequalities
 11. Sustainable Cities & Communities
 12. **Responsible Consumption & Production**
 13. **Climate Action**
 14. **Life Below Water**



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15. **Life on Land**
16. Peace, Justice & Strong Institutions
17. Partnerships for the Goals

The proposed development has been discussed extensively with our members and with our latest committee meeting an unanimous decision was reached to voice our concerns and, to formally inform all parties concerned, that we are not in favour of any such development as it is deemed to impact negatively on the environment followed by detrimental effects on all nearby communities..

Yours sincerely,

Chris van Niekerk
Chairman; Velddrif Chamber of Commerce

Cc; Management Committee, Members

**DRAFT SCOPING
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COMMENTS**

**WEST COAST
DISTRICT
MUNICIPALITY**

**WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY**

Rig alle korrespondensie aan:
Address all correspondence to:

**MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER**

Navrae / Enquiries: Miss C. Ganten-Bein
Verw Nr / Ref No: 15/2/3/5/1



Posbus / P O Box 242
MOORREESBURG, 7310

Telefoon/Phone (022) 433 8400
Faks/Fax Nr. 086 6926 113

E-Mail Adres/Address:
westcoastdm@wcdm.co.za

17 January 2019

Senior Environmental Consultant
Greenmined Environmental
Postnet Suite 62
Private Bag X15
Somerset West
7129
Via email: christine.f@greenmined.co.za

Dear Ms Fouche

WEST COAST DISTRICT MUNICIPALITY COMMENTS: DRAFT SCOPING REPORT: MINING RIGHT APPLICATION (WC 30/5/1/2/2/10110 MR), BONGANI MINERALS (PTY) LTD, OVER PORTION 1 OF FARM 297 RD, PORTION 6 (REMAINING EXTENT) OF FARM NAMAQUASFONTEIN 76 RD, AND PORTION 21 OF THE FARM NAMAQUASFONTEIN 76 RD FOR THE WINNING OF TUNGSTEN AND MOLYBDENUM.

With reference to the electronically received notice in relation to the above, this office has the following comments:

1. It is noted that various studies are still to be conducted. One of these studies include an air, dust and noise impact assessment. This office requests a copy of the studies where further comments may be provided.
2. The National Dust Control Regulations dated 01 November 2013 and as amended must be applied.
3. No listed activity may be conducted on the mine site without an Atmospheric Emission Licence issued by the competent authority.
4. The Piketberg region is a water scarce area. This office is not in favour of the proposed project as large amounts of water is one of the main requirements for mining operations and dust suppression. Without water the impact of fugitive dust from mining operations may negatively affect the surrounding area and land users. It is important that the abundance of water is established to ensure that dust suppression will be maintained and the remaining Piketberg region land users will not lack water themselves due to this proposed project.

Yours Faithfully


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**C. GANTEN-BEIN
MANAGER: AIR QUALITY**

**WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY**

Rig alle korrespondensie aan:
Address all correspondence
to:

**MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER**

Navrae/Enquiries : Doretha Kotze
Verw.Nr./Ref. No.: 13/2/12/5/1



Posbus / P O Box 242
MOORREESBURG, 7310

Telefoon/Phone (022) 433 8400
Faks/Fax Nr. 086 6926 113

E-Mail Adres/Address :
westcoastdm@wcdm.co.za

28 January 2019

ATTENTION: CHRISTINE FOUCHE
Email: christine.f@greenmined.co.za

Greenmined Environmental
Postnet Suite 62
Private Bag X15
SOMERSET WEST
7129

Madam

**DRAFT SCOPING REPORT: PROPOSED MINING RIGHT APPLICATION ON
PORTION 1 OF FARM 297, PORTIONS 6 AND 21 OF FARM 76, PIKETBERG**

1. Your electronic communication of 11 January 2019 and the DSR for the proposed mining right refer. Your attention is also drawn to the comments (letter 15/2/3/5/1 dated 17 January 2019) from the Air Quality Officer of the West Coast District Municipality.
2. The West Coast District Municipality is not in favour of the proposed mining of tungsten and molybdenum in the Moutonshoek Valley. As with the previous prospecting right application, the West Coast District Municipality is of the opinion that mining in this pristine biodiversity area will have a negative impact on the surface and ground water sources in the area. The Krom-Antonies River and the Moutonshoek catchment is the single biggest source of surface and ground water in the area. Surrounding communities, the agricultural sector and the Verlorenvlei Estuary depend on this water source.
3. The area in question is a newly proclaimed Protected Area (ito NEMPAA) due to its extremely high biodiversity value (e.g the Verlorenvlei Redfin, a Red Data fish species is endemic to the Krom-Antonies River and Moutonshoek catchment) and scenic beauty. The Protected Area status of the area necessitates approval from the National Department of Environmental Affairs.

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4. The productive farming area in the region, as well as the internationally recognised importance of the Verlorenvlei RAMSAR Wetland and Important Birding Area (IBA), will not benefit from this application. Furthermore, Verlorenvlei Estuary is one of only two RAMSAR sites on the entire West Coast of South Africa - the other being Langebaan Lagoon. Risks associated with the mining of tungsten and molybdenum, i.e the loss of biodiversity and threats with regard to the quantity and quality of ground and surface water in the already arid Sandveld Region, cannot possibly be mitigated in a sustainable manner.
5. The sustainability of the agricultural sector in the area, which provides 500 permanent and 1000 seasonal employment opportunities, is dependent on the surface and ground water sources in the area. The Krom–Antonies River and the Verlorenvlei Estuary are critical water sources for sustained agricultural production in this water scarce environment. Mining in the Moutonshoek Valley will compromise the sustainability of the agricultural sector in the area with resultant negative effects on current and long term employment opportunities.
6. Agricultural production in the Moutonshoek Valley and along the river towards Verlorenvlei and onto Elands Bay (a distance of 60+ kilometers) have been contributing towards food security and long term employment opportunities for the past 150+ years. The Director General of the Department of Mineral Resources had previously stated that, in order to safeguard food production for food security, mining should not be approved on productive agricultural land.
7. The persistent drought in recent years (2015 – 2018) had a negative effect on the Verlorenvlei Estuary with regard to water levels and water inflow from the Moutonshoek catchment. Climate change predictions estimate that future water levels will be affected by lower rainfall, thus having a negative effect on the availability of surface and ground water and consequently, water availability in the region and water inflow into the Verlorenvlei Estuary. Mining in the Moutonshoek Valley will only exacerbate this situation and should not be contemplated.
8. Proper functioning of the Verlorenvlei Estuary/RAMSAR site will not be possible without the fresh water from the Moutonshoek catchment. Any change in the availability of water to this sensitive and pristine natural environment will compromise the effective functioning of the estuarine system. Pollution of ground and surface water by mining activities in the Moutonshoek catchment and lower reaches of the Krom-Antonies River will further compromise the functioning of the estuary.

9. Considering the scarcity of water in the area, the risk of pollution to surface and ground water sources by mining activities, as well as the effects climate change may have on water availability, the West Coast District Municipality considers the impact of mining in the Moutonshoek Valley unacceptably high.
10. Attached hereto please find Annexure A containing additional information in this regard:
 1. A graph showing decreasing water levels from Jan 2017 to June 2018.
 2. Photographs depicting the state of the Verlorenvlei Estuary during the winter (rainy season) of 2018 (August 2018).
 3. Information regarding the salinity levels in the Verlorenvlei Estuary during February 2018.
 4. An extract from the Integrated Coastal Management Act pertaining to the management of estuaries.
11. The West Coast District Municipality strongly objects to the proposed mining in the Moutonshoek Valley for the reasons set out above.

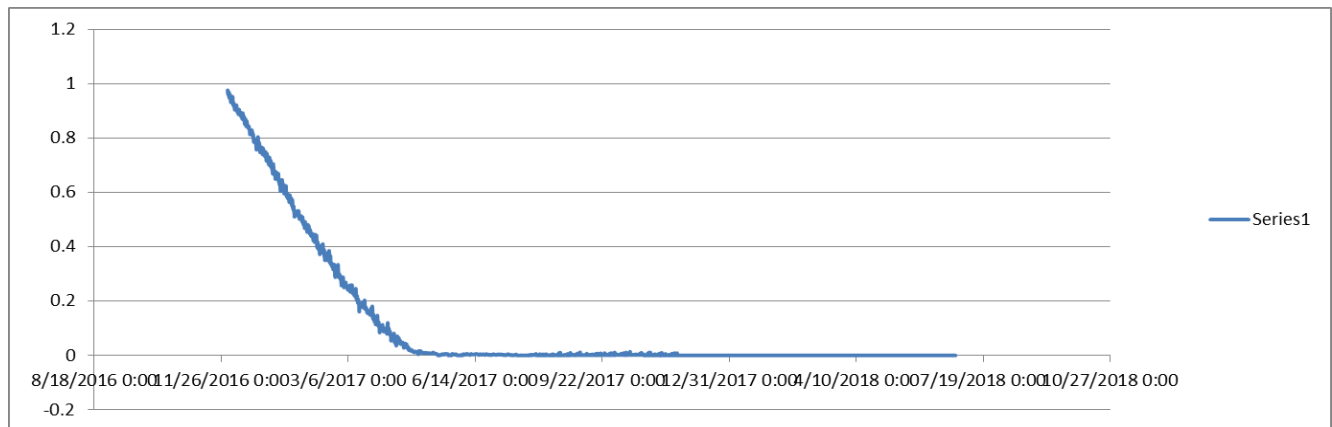
Yours faithfully



MR. D. JOUBERT
MUNICIPAL MANAGER
/dk

ANNEXURE A

1. Water Levels



WATER LEVELS AT VERLORENVLEI IN METRE - 1st January 2017 to 26th June 2018 (unchanged to date)
Data from G3T001 at DWS jetty Verlorenvlei

2. Photographs showing the existing extremely low water levels of the Verlorenvlei due to the 2018 drought (climate change) and possibly also due to over abstraction (allocation) of surface and groundwater approved by DWS in the Moutonshoek/Verlorenvlei catchments. This is the scenario without the current mining proposal by Bongani Minerals.



Verlorenvlei August 2018 – Vensterklip – DWS Jetty

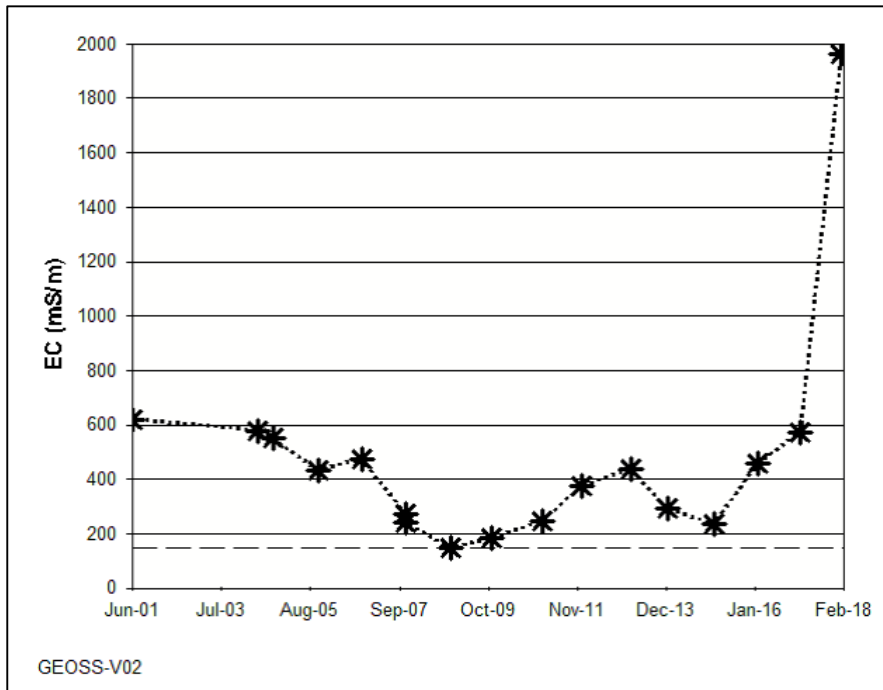


Aerial Photograph - Verlorenvlei August 2018 - nothing has changed except that the water has receded way inland beyond Vensterklip leaving most of the estuary completely dry which increases the salinity and changes the biodiversity completely



Aerial Photograph - Verlorenvlei August 2018 - View towards the coast, estuary completely dried up - Vensterklip bottom right

3. Salinity levels - Verlorenvlei Estuary



Hyper saline levels at Nuwerus Farm - February 2018 due to low rainfall & water levels (climate change) linked to possible over allocation/consumption of surface and groundwater in the catchment.

4. Extract from the National Environmental Integrated Coastal Management Act, 2008 (Act No 24 of 2008) No. 36432 GOVERNMENT GAZETTE, 10 MAY 2013 refers:

“4. Standards for Estuarine Management

“4.5 An estuary must be managed to avoid, minimize or mitigate significant negative impacts that include but are not limited to reduced water flows and loss of habitat or species;

An estuary must be maintained in its ecological category as determined in the 2011 National Biodiversity Assessment (NBA) and subsequent updates in order to meet biodiversity targets, and to take into account the recommended extent of protection and recommended ecological health category; and

The classification and setting of the Ecological Reserve and Resource Quality Objectives (RQO) of an estuary must take into account the current ecological health status, recommended extent of protection and recommended ecological category in order to meet the biodiversity targets as set in the 2011 NBA and the subsequent updates.”

**DRAFT SCOPING
REPORT
COMMENTS**

**WILDLIFE AND
ENVIRONMENTAL
SOCIETY OF
SOUTH AFRICA**



11 February 2019

C/O 6 Weavers End, Kommetjie 7976

Greenmined Environmental(Pty) Ltd
Unit MOI Office No 36
AECI Site Baker Square
Paardevlei
De Beers Avenue
Somerset West
7130

By email: Christine.f@greenmined.co.za

Dear Ms Fouche

APPLICATION FOR MINING OF TUNGSTEN IN THE MOUTONSHOEK VALLEY ON PORTIONS 1 OF FARM 297 AND PORTIONS 6 AND 21 OF FARM NAMAQUASFONTEIN NO. 76 — DRAFT SCOPING REPORT.
DMR REF: WC 30/5//1/2/2/101 10 MR

After consultation with members in the area and other I&As WESSA Western Cape membership endorses the concerns that have been raised especially with regard to the following:

1. The conservation value of the Moutonshoek Valley for the protection of terrestrial ecosystems and the diverse species of they support in a declared Protected Area which is not clearly outlined in the Scoping Report. The fact that this protected Area is also part of the Greater Cederberg Biodiversity Corridor, makes it more significant and shows that conservation planning for the whole region has been a priority for a long time.
2. Despite the impacts of agriculture there are still areas of indigenous vegetation, some of it critically endangered that would be destroyed or impacted negatively by such a mine. Red data species of birds and critically endangered fish would be similarly affected.
3. The direct challenge to the Western Cape Biodiversity Spatial Plan that has determined terrestrial and aquatic Critical Biodiversity Areas (CBAs) as well as Ecological Support Areas (ESAs) within and adjacent to the application area. These are critical to the delivery of vital ecosystem services in the whole Verlorenvlei catchment. The beneficiaries of these are

hugely more numerous than those of a mine which at best will deliver short term economic benefits to a few.

4. Compromising of an internationally recognized RAMSAR wetland area that puts at risk the credibility of South Africa to conserve its wetlands and prioritize them as mitigators of drought in a dry landscape.
5. Roads, electricity and potable water demand in an area unused to such destructive industrial activity and vulnerable to its impacts, pose further problems that outweigh any alleged benefits.
6. The less than comprehensive public participation and early notification of all I&As in an extensive area is cause for concern as it suggests that many stakeholders might be unaware of the latest mining application that seems to be a duplication of the one undertaken several years ago.
7. The economy of the Cape West Coast has been focusing on lower key eco-tourism-based activities that move away from the dig-and-dump approaches of the past that have left swathes of coastline degraded and uninhabitable.

We therefore conclude that, as before, this application is ill-considered, enjoys little support from local communities and conservation authorities, is out of synch with landscape-scale planning, does not take cognizance of current scientific data and poses a longer-term economic threat in a sensitive region that has by no means exhausted sustainable livelihood options. It should not be pursued.

Yours faithfully

A handwritten signature in black ink on a light gray background. The signature is stylized and appears to read 'P. Dowling'.

Patrick Dowling

WESSA:WC Committee member