



the federation for a sustainable environment

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PRELIMINARY COMMENTS ON THE ENVIRONMENTAL ASSESSMENT PROCESS
FOR THE PROPOSED PLANT EXPANSION PROJECT FOR THE PILANESBERG
PLATINUM MINE (PTY) LTD

DRAFT SCOPING REPORT FOR REVIEW

Reference numbers:

SLR: 710.16002.00026

DMR: NW30/5/1/2/2/320MR ;

DEDECT: NWP/EIA/87/2013

My preliminary comments, on behalf of the FSE, and in the absence of having read the draft Scoping Report are as follows:

In April 2015 we were informed of the EIA/EMP report for the proposed changes to surface infrastructure at Pilanesberg Platinum Mine (DREAD REF: NWP/EIA/88/2011. DEA REF NO: 12/9/11/L750/7).

The above-mentioned application involved significant changes to the surface infrastructure namely, the Applicant proposed to *inter alia*:

- Extend the Tuschenkomst open pit onto the farms Wilgespruit 2JQ and Portion 1 of Rooderand 46JQ

- Extend the existing Tuschenkomst waste rock dump
- Construct three bridges over the main Wilgespruit channel and / or its tributaries within the project area
- To extend the footprint of the existing waste rock dump on the farm Tushenkomst 135JP.

In the recent application, we are informed of the Applicant's proposed expansion of:

1. A mineral processing facilities to incorporate the following within the boundary of the existing processing plant
2. A hydrometallurgical plant for the extraction of PGMs and base metals;
3. An UG2 milling and flotation circuit to process ore from the SPM operation;
4. A modular tailings re-treatment plant for the extraction of PGMs, which will require the re- processing of the existing TSF;
5. A chrome recovery facility to extract chrome resources from ore produced by the Sedibelo Platinum Mines operation.

In addition to the above-mention processing facility expansion, it is planned that the following infrastructure will be established or upgraded:

- the existing sewage treatment plant will be upgraded;
- establishment of a waste storage facility at the mine and plant area;
- construction of a new training centre;
- establishment of a number of community based initiatives such as:
- aggregate crusher and brick making project

We express concern regarding the piece-meal approach by the Applicant. We hereby request that an assessment be conducted of the accumulative impacts of:

1. the current operations
2. the changes to the surface infrastructure at the Pilanesberg Platinum Mine
3. the proposed Plant Expansion

We hereby record our objection to the above-mentioned Application grounded upon the following:

1. An Environmental Management Framework (EMF) for the Pilanesberg area has not been developed.
2. A regional assessment of the impacts upon water quality and quantity has not been conducted.

In terms of the Department of Water Affairs' *Classification of Significant Water Resources in the Crocodile (West) Marico WMA and Matlabas and Mokolo*

Catchments: Limpopo WMA (WP 10506) Classification Report a dramatic increase in water demands is predicted as a result of:

- Current mining activities and proposed mining activities
- Sasol's proposed Maphuta coal to liquid fuel projects
- The exploitation of the vast coal reserves in the Waterberg;
- Exxaro's Grootegeluk Colliery (largest open cast coal mine of its kind in the world);
- The expansion of the Grootegeluk mine to supply the new Medupi Power Station with coal; and
- Matimba and Medupi three new Eskom power stations in the future. (Pages 3 and 4 of the Classification Report.)

In terms of the *Summary of challenges in the WMA* (Ref. DWS Business Case for the Limpopo CMA. September 2013) it was found that:

- Water resources are nearly fully developed with all available water being highly utilised
- Limited options for further resource development exists - attributable to the arid climate, unfavourable topography, sandy rivers as well as important conservation areas
- Implementation of the Reserve is expected to result in serious deficits in some of the main river catchments
- Planning has been made for large new mining developments in the Mokapane-Mogoto area for which additional water will be required
- Urban and industrial growth will mainly be concentrated in the Johannesburg, Tswane and Polokwane areas, where local water resources already are in short supply and need to be augmented by transfers from other WMAs.
- There are severe eutrophication problems at dams in the WMA.
- Possibility for new power stations and/or petrochemical industries to be developed around the coalfields in the Lephalale area
- Water pollution owing to large quantities of effluent discharged into the rivers in urban and industrial areas in the WMA.

If Acid Mine Drainage is not treated to a level where the salt load is removed, the Upper Vaal will go into deficit. With the Upper Vaal in deficit there would then be no possibility of transferring water into the Crocodile West/Marico and Limpopo Water Management Areas¹.

At the time of writing the feasibility study for the long term treatment of AMD (desalination) has not been signed off by the honourable Minister of Water and Sanitation.

¹ Reference: The Impact of Acid Mine Drainage in the Witwatersrand on the Mining Industry in Mpumalanga, Free State, Limpopo, North West and Northern Cape Provinces. Richard Holden. Trans Caledon Tunnel Authority. 2013

3. A decision by the DMR regarding the internal appeal which was brought by the FSE, in December 2011 in terms of Section 96(1) of the MPRDA for the amendment to the Pilanesberg Platinum Mine's EMP's Closure Objectives, has not been taken.
4. The PPM operated without a lawful water use licence from 2008 to November 2013 and diverted two river systems,
5. The project falls within a National Freshwater Eco-System Priority Area (NFEPA) NFEPA area.

In terms of the Mining and Biodiversity Guidelines of the Department of Mineral resources FEPA areas are areas of the highest biodiversity importance. These areas present the highest risk for mining and the likelihood of a fatal flaw is very high because of the significance of the biodiversity features in these areas and the associated ecosystem services.

These areas are viewed as necessary to ensure protection of biodiversity, environmental sustainability, and human wellbeing.

An EIA should include the strategic assessment of optimum, sustainable land use for this particular area in order to determine the significance of the impact on biodiversity. This assessment should full take into account the environmental sensitivity of the area, the overall environmental and socio-economic costs and benefits of mining and well as the potential strategic importance of the minerals to the country.

Authorisations, in terms of the above-mentioned Guidelines, **may well not be granted**. If granted the authorisation may set limits on allowed activities and impact, and may specify biodiversity offsets that would be written into licence agreements and or authorisations.

6. The project will significantly and adversely impact upon the viability of future land uses and livelihood opportunities as identified in the IDPs of the Moses Kotane Municipality.

The recently developed National Development Programme, does not state that mining investment and production is “urgent”, but rather that “[it] is urgent to stimulate mining investment and production in a way that is environmentally sound....” (Reference: National Planning Commission National Development Plan 2030: Our Future – Make it Work (n.d.),146.)

We believe that the project is not environmentally sound, ecologically sustainable and economically and socially justifiable.

SUBMITTED BY:

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