## Annexure I

Name	Surname	Comment received via	Comment	Date	EAP Response	Applicant Response
Decemb	Khambu	Volksrus	DEA ,that this municipality is in desperate need of investment of the magnitude proposed by Atha Africa to address the needs of poverty eradication, unemployment, improvement of medical facilities, infrastructure and advancement of rural development, thus it has been encompassed in our IDP as one of the anchor projects . Should you require further information you may contact the Manager LED, Mr M G Nyembe at 017-7346305 Yours faithfully P B MALEBYE MUNICIPAL MANAGER		Note that Atha can	Mine authorization
er	le	t Library			only embark on the appointment of contractors and employees after the project has been authorised.	process is underway
Caroline	Lötter (Natural Scientifi c Services )	Email	COMMENTS ON THE AMENDED ATHA YZERMYN COAL MINE EIA REPORT As a registered Interested and Affected Party, and having performed the initial floral, faunal, wetland and aquatic ecological specialist assessments for the proposed ATHA Yzermyn Coal Project (AYCP), Natural		The report was included as is. None of the information was discounted, but the evidence provided by NSS informed decision making towards an improved understanding of the project. These informed decisions reduced the potential impacts on the environment by a) changing the	Noted

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		received via				
			Scientific Services		location of various	
			(NSS) hereby asserts		activities	
			that our numerous		b) changing the	
			concerns about the		activities itself	
			impact of the AYCP		which resulted in a	
			on biodiversity, as		reduced footprint	
			described in our		and a significantly	
			AYCP "Biodiversity		reduced impact on	
			Baseline and Impact		the environment as	
			Assessment Report"		was the intention of	
			dated September		impact assessments.	
			2013, remain as is.			
			In addition/In		As an initial	Noted
			particular, we are		contributor to the	
			concerned that: the		ESIA report, the I and	
			Introduction to the		AP had EVERY	
			"UPDATED		opportunity to	
			Environmental and		highlight these issues	
			Social Impact		in their own	
			Assessment Report		contribution to the	
			and Environmental		report. If at the time	
			and Social		there was no need to	
			Management		include it as part of a	
			Programme" (DEA		study that had a	
			Reference –		greater impact on	
			14/12/16/3/3/2/693)		the environment,	
			is distinctly skewed		calling for this as a	
			towards highlighting		requirement after	
			the supposed "need,		the fact and focusing on surface coal	
			desirability and National Interest" of			
			the AYCP. We think		mining as regarded as irrelevant to the	
			the report needs to		decision making	
			be amended to		process. Having said	
			include a thorough		that, if the I and AP	
			discussion on the		feels strongly about	
			impact of coal mining		this, they are	
			on the environment		welcome to	
			and biodiversity in		contribute the	
			South Africa, and		relevant clauses and	
			especially		this will be included	
			Mpumalanga, as		in the response. At	
			recently discussed by		the time that	
			e.g., Colvin & Burns		EcoPartners was	
			2011		appointed, we did	
			(http://www.wwf.or		engage with NSS	
			g.za/?4981/coalwate		from the start, they	
			r), Dabrowski & De		had ample	
			Klerk 2013		opportunity to bring	
			(http://researchspac		these issues to the	
			e.csir.co.za/dspace/h		table. They were	

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		VIU	andle/10204/7614),		also one of the first I	
			Cronje et al. 2014		and APs to access the	
			(http://www.bench-		website and were	
			marks.org.za/researc		the very last to	
			h/policy_gap_9.pdf)		comment. These	
			and Davies 2014		issues could have	
			(http://www.dailyma		been highlighted and	
			verick.co.za/article/2		each one responded	
			014-09-15-groundup-		on individually, they	
			mpumalanga-		chose not to.	
			environmental-crisis-			
			why-is-nobody-			
			listening/#%2EVBgHa			
			2AcTIV) – to list but a			
			few pertinent			
			references. There			
			also needs to be a decent discussion on			
			the impact of coal			
			mining on global			
			warming and climate			
			change.			
			Although a more		We acknowledge the	Noted
			comprehensive		concerns about the	110100
			predictive ground		ground water model	
			water model was		accuracy and agree	
			developed for the		with the	
			amended AYCP EIA		precautionary	
			report, there are still		principle. It is	
			inherent		accepted practice to	
			assumptions and		run these models as	
			limitations to the		conservatively as	
			model and,		possible due to the	
			therefore, results		low levels of	
			from the model		accuracy and it can	
			should be treated		be accepted that this	
			with caution. The established		is reflecting the	
					worst case. The models will be	
			connectivity between the shallow		validated regularly	
			weathered and		and management	
			deeper fractured		interventions	
			aquifers means that		implemented as the	
			significant mine de-		mining progress, as is	
			watering could have		the commitment in	
			a devastating impact		the EMP. It is	
			on affected wetlands		important to note	
			(specifically the		that the specialist	
			springs), aquatic		team has visited	
			ecosystems		other mining	
			(baseflow to the		operations in the	

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			Assegai River) and the biodiversity that these support, including many conservation important species "The ensuing cone of dewatering due to mine inflows will capture groundwater, which would have otherwise contributed to spring discharges, leakages along hill slopes, wetlands, river baseflow or to deeper regional groundwater flow."		same geological formation and no indication was found during observation on these mines that the connectivity between the water table in the vados zone and the deep groundwater is significant and leading to large scale disruption of the wetlands in the area. even the historic mining sites near the proposed project shows virtually no inflows into the old workings. We will proceed with caution and regularly validate the models to ensure early response to any unpredicted impacts.	Noted
			in the wetland report do list the following two impacts from the de-watering, o Formation of groundwater cone of dewatering, leading to reduced recharge of wetland resources		for the impact on the wetlands will be using artificial recharge mechanisms. We accept that some impact will occur on the wetlands, but that this is small enough to be acceptable if balanced against the bigger picture of the mine development and the positive regional soicioeconomic impact.	Noted
			o Dewatering of wetland habitat down gradient of mining activities, leading to loss of water within wetland		We shall address this in the executive summary. The opinion of the specialists is that the wetlands will not be	Noted

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			habitat and altered hydrological patterns the impact is not highlighted in the executive summary or the text as being of significance.		dried out completely and would recover after mining has stopped as the water tables rebound.	
			The mitigation measures for this impact also refer to those from the groundwater report, however no specific mitigation measures are highlighted in this report for this impact. This impact, together with the impact of the decant, should both make the project unfeasible if not mitigated efficiently. In our opinion, this impact alone, cannot justify the short-term economic gains of the AYCP.		We appreciate your opinion on this matter, but as stated the effective mitigation can be used to ensure that the short-term gains and the long term impacts be addressed.	It may also be noted that the best environmental option provided in the report now is devoid of wash plant and discard dump.
			No biodiversity assessment work was performed for the main access route and other servitudes that will be utilized, upgraded or developed for the AYCP.		Increased road traffic was addressed in the traffic impact assessment. No Power line servitudes will be needed. The initial report completed by yourselves did cover the entire area.	Noted
			The planned surface infrastructure and underground mining (involving noise, vibrations and blasting), would be situated only a few hundred meters away from historical adits containing large numbers of conservation important and other		The mining will be more that 1km from the bats. It is an underground mine, therefore blasting noise and vibration will be very small with no felt vibrations expected that far from the mining operation. the mining will also be moving	Noted

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		via				
			bat species. Please		progressively away	
			provide an explicit		from the historic	
			discussion on this		mining sites,	
			important		reducing any of the	
			biodiversity impact		impacts even further	
			of the AYCP in the		over time. The	
			EIA report		historic mines will	
			introduction.		also be a no-go area.	
			We will wait in			
			patient anticipation			
			to review the final			
			AYCP EIA report.			
			Kind regards			
			Caroline Lötter			
			for Natural Scientific			
<b>D</b> 11	121 1 1	-1	Services		TI I C	
Donald	Khauhel	email	I AM DONALD		Thank you for your	Mine authorization
	0		LEBAMBO FROM		comments. Note that	process is underway
			VOLKRUST I WOULD		Atha can only	
			LIKE TO APPLY FOR		embark on the	
			THE JOB IN YZERMYN		appointment of contractors and	
			UNDERGROUND COAL MINE.			
			I AM FULLY CRANE		employees after the project has been	
			OPERATOR AND I		authorised.	
			HAVE A LOTS OF		authoriseu.	
			EXPIRIENCE.MAY			
			YOU PLEASE MAM			
			OR SIR GIVE ME			
			SOME INFORMATION			
			REGARDING TO			
			APPLY FOR THE JOB			
			IN YZERMYN OR FAX			
			NUMBER WERE TO			
			FAX A CV TO. MY			
			NUMBER IS			
			0719002813 MY			
			EMAIL IS			
			donaldd4g@gmail.co			
			m			
			I will appreciated			
			your respond			
			regarding any			
			information.			
Kathlee	Saunder	email	Dear Eumari,		It is the opinion of	Proper mitigation
n	S		Our concerns remain		the independent	measures have been
			unchanged and		environmental	identified and
			unaddressed in the		practitioner to that	incorporated in the
			review. The		the impact of the	report.
			amendments do not		Yzermyn	
			significantly change		Underground Coal	