INTRODUCTION
The aim of the public participation process is to make sure that the stakeholders, interested and affected parties as well as the general public are informed, are able to contribute inputs and to engage in the formal process (commenting on the draft documents).

The public participation process
Various stakeholders and interested and affected parties were identified during this process. These included the business sector, mining sector, agricultural sector, transport sector, conservation sector, tourism sector as well as the general public.
Three phases for the Waterberg District EMF were conducted. These included the circulation of the project News and Information Document (Background and Information Document), conducting focus group meetings as well as public open days.

The Project News and Information Document were sent to stakeholders, interested and affected parties as well as the public to inform them of the Waterberg District EMF and its processes. Invitations to the focus group meetings were sent out to the various sectors in the Districts as well as the Local Municipalities’ representatives.

During the public open days process invitations were sent to stakeholders and interested and affected parties. Notices were also advertised in the newspapers (Die Bosvelder, Die Pos and Kwêvoël).

A combined total of 29 meetings were held as focus group meetings and the public open days in 6 different towns in the District during the month of April and June 2010.

The Draft Desired State Report was made available for comments to the stakeholders and interested and affected parties in July 2010.
Round 1 of the Focus Group Meetings
Round 1 of the focus group meetings were held from 12 April to 15 April 2010. Eight meetings were held in Lephalale, Vaalwater and Modimolle during this phase. The focus group meetings were structured meetings with individual sectors as well as the Local Municipalities representatives (one-on-one meetings). A questionnaire was used in order to engage the participants in the EMF process as well as to hear their views with regards to the challenges which they are currently encountering in the Waterberg District area. A total of 52 people attended the focus group meetings. A special meeting with Eskom was also held during this phase on 16 April 2010.

Round 2 of the Focus Group Meetings and Public Open Days
From 3 June to 9 June 2010, round 2 of the focus group meetings and public opens days were held concurrently. The focus group meetings were held in the morning while the Public Open Days were held in the afternoons. A total of 9 meetings were held between the two processes, 4 focus group meetings and 5 public open days. The meetings were held in Modimolle, Vaalwater, Lephalale, Thabazimbi, Mogalakwena and Bela-Bela. A questionnaire and CD of the Draft Status Quo Report was handed out during the two processes and comments on the draft report were invited. A total of 56 people attended the meetings and 21 responses from the questionnaires handed out during the meetings were received.
KEY ISSUES

The key issues for this project were identified in three stages. In the first stage, key issues were identified by the project team, before the public participation process began. In the second, issues that arose during the first round of public participation were identified and in the third stage, additional, and persistent issues that arose during the second round of public participation were identified.

A concise point form summary of the issues encountered during the project process up to this point can be found below.

Water

- The relative scarcity of water in the Waterberg District was a key issue identified before the public participation process and remained an issue throughout the process.
- Water pollution remained a strong issue, with pollution occurring from failing sewage works proving of greatest concern. Other sources such as industry, and agricultural pesticides and fertilisers were also identified.
- The quality of water for human consumption.
- The protection of important river catchment areas, and the upper parts of river systems remained a concern throughout the process, but came out particularly strongly in the second round of public participation.
- The issue of reserve determination was raised during both rounds.
- The issue of negative impacts that extensive alien vegetation has on waterways was raised during both rounds.
- Illegal dams and water extraction was raised as a concern during the first round of the public participation process.

Air quality

- The potential significant changes that may occur in air quality was identified and remained an issue through both rounds.
- Air pollution sources of concern identified in the first round of public participation include dust from mining operations, and pollution from future developments.
Air pollution sources of concern identified in the second round of public participation include pollution from heavy traffic in areas, and the burning of waste dumps, especially at game farms.

The adoption of maximum acceptable air pollution parameters for specific areas of the Waterberg District was an option that was raised during the second round.

Character of the Waterberg District

The visual impact of the power stations and other developments in the area was raised as an issue before and during the public participation process.

The sudden, rapid, poorly planned expansion of urban areas was raised as an issue before and during the public participation process.

The issue of noise pollution was raised in the first and second round of public participation.

Protecting and promoting the Waterberg District’s unique landscape was raised in both rounds of public participation.

The possible negative impacts changes to the area such as increased noise pollution and visual impacts of developments will have on nature based tourism of the area was raised as an throughout the process.

Waterberg Biosphere Reserve

Uncertainty surrounding the biosphere implementation due to understanding roles between government and the private sector was raised in the first round of the public participation process.

The boundaries of the Waterberg Biosphere reserve are not clearly defined.

There is an opinion that the Waterberg Biosphere Reserve has a fragmented layout, and that it should be consolidated into one continuous area.

The possible expansion of the Waterberg Biosphere Reserve boundaries was also raised as an issue in the second round of public participation.

The Waterberg Biosphere Reserve’s management. It was suggested that the Waterberg Biosphere Reserve be managed according to an Environmental Management Plan, which has clear boundaries and zonation.
Other environmental issues

- The presence of alien invasive species was raised in both rounds.
- The collection of wood from natural vegetation, and the subsequent damage this causes was an issue raised in the second round.

Change to the population structure and socio-economic conditions

- The change to the population structure and socio-economic conditions was identified as a key issue before the public participation, and remained a strong issue throughout the process.
- The sudden influx of people to the area raised the concern that towns do not have the capacity to deal with the increased population. The infrastructure capacity of towns was questioned, especially with regards to dealing with waste disposal, additional sewage generation, housing, electricity and water supply.
- The number of people in the area far exceeds the number of available jobs. This leads to severe poverty and increased crime rates. Both these issues came out strongly in the first and second rounds.
- The use of imported labour, because the local population is “unskilled” is giving rise to xenophobic tensions in the area.

Service needs

Service needs were raised as a major key issue throughout the process.

Roads

- The condition of the roads was voiced as the major concern. The deterioration of the roads has now progressed to such an extent that they are hazardous to use. This has a negative impact across the whole district.
- The poor road condition has a negative impact on tourism.
- The poor maintenance of roads and road shoulders means that roads do no longer serve as fire breaks.

Telecommunications

- Telecommunication is generally very poor in the Waterberg District. The existing infrastructure is overloaded and unreliable.
- Unreliable telecommunication impacts negatively on services such as banking, and Internet communication.
• Poor telecommunication impacts business conducted in the Waterberg District negatively.

Electricity
• The electricity supply to certain areas of the Waterberg District is unreliable and power outages often occur.

Water and sewage
• The complete failure of sewages works to deal with generated sewage and the subsequent pollution of water systems were raised as a major concern.
• The provision of potable water to communities was raised as an issue.

Education and skills training
• The low levels of education in the Waterberg District is a far reaching issue.
• The quality of education offered is also considered to be well below standard. This impacts on the ability of school leavers to integrate into more urban areas, or attend tertiary education facilities.
• The need for skills training in the Waterberg District has been emphasised by several participants. Many of the local people are not considered for the employment opportunities in the area, as they are unskilled.

Waste disposal
• Few proper solid waste disposal sites exist in the Waterberg District. This makes disposing of waste legally very expensive, as it is necessary to transport it over a distance.
• Game farms and lodges often have their own waste sites. These are sometimes mismanaged, and practices such as setting the waste on fire have been raised as an issue.
• A strong desire for recycling to become the preferred destination for waste in the Waterberg District was expressed.

Government
• The issue of co-operation between the various government departments was raised during both the first and second round of public participation.
• A long-term perspective and vision from government is desired.
• Procedures and regulations in dealing with government being time consuming and difficult to follow was raised in both rounds.

• Competent government authorities, who do not display indifference to the public is desired.

• The issue of more implementation, policing and action from government was an issue that came out strongly in both rounds.

• The issue of a government that takes non-political decisions arose in the second round. Decisions should be made, based on what is best for the people and the area concerned.

• The issue of government taking responsibility for and acting upon the results of the EMF was an issue that came out in the second round.

**Planning and development**

• The development of a transport infrastructure, especially in terms of coal transportation, whether by road or rail was a key issue that arose during the first round.

• The upgrading of certain roads, to take advantage of tourism potential was an issue raised in the first round.

• The possibility of a future dam within the area to meet water needs was raised as a question in the second round of public participation.

• The issue of single infrastructure corridors was met with a positive reaction from all participants. However the issue of technical problems as well as the planning was raised in regard to the corridors.

• Development of the area was a key issue in both rounds. It was stated that if development were more transparent, it may help to lift some of the uncertainly paralysing the area.

As part of the public participation process, other meetings were held on various aspects of the Waterberg District EMF with different organisation representatives. These included Sasol, Eskom, the World Bank, Telekeshi Ramoshobane Rural Community, the Department of Transport, RESA Project representative, the Department of Agriculture, the Department of Environmental Affairs Air Quality, the Department of Water Affairs, the Waterberg District Municipality Planning Forum and the Waterberg Biosphere Reserve Committee. These meetings were held in July and
August 2010. The main objective of having the meetings was to get a broader and clearer understanding on various issues identified during the process from some of the key players in the area.

On 13 September 2010, the stakeholders and interested and affected parties were invited to submit their comments on the draft environmental management zones. Invitations were sent via e-mail.

Stakeholders and interested and affected parties were informed that the draft EMF Report was available on the website address www.metrogis.co.za.

A notice was also advertised in the newspapers (Die Bosvelder, Die Pos and Kwêvoël) on 7 and 8 October.

Closing date for comments and inputs ended on 12 November 2010.
COMMENTS AND RESPONSES

ROUND 1: PUBLIC PARTICIPATION PROCESS

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<th>Conservation Focus Group</th>
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| Moletadikgwa Wildlife Sanctuary Richard Wadley | There are many issues that various stakeholders might raise, but in my view, there are just a few key facts that need to be borne in mind when considering which initiatives or projects might be appropriate for the area that is becoming known as the Waterberg Plateau.  

1. Minerals resources: Notwithstanding various ill-informed rumours and recent frivolous prospecting rights applications to the contrary, the fact is that geological composition of the plateau is such that there is virtually no probability of economic deposits of any useful mineral being discovered on the plateau. This should at once allay concerns about the potential for polluted, disruptive mining operations, while also making the point that there cannot be an expectation of large scale local employment creation (through mining) for unskilled workers.  

2. Water resources: Despite its name, the Waterberg Plateau is in general, a region of poor and small underground water aquifers. This fact—endorsed by the Department of water Affairs and the Water Research Commission—has to be taken into account when contemplating alternative sustainable development projects. There is no morality approving and building ever greater urban extensions to a town like Vaalwater when even the existing town lacks adequate water supplies. Indeed, to do so is a grossly irresponsible act of urban mis-management. Similarly, large residential tourism projects, especially including those that contain high water consumption facilities such as golf courses or high density residential complexes, are simply not sustainable in a region where there is insufficient reliable, long-term availability of underground water.  

3. Soil resources: The Waterberg is well-known to be characterised predominantly by so-called “sourveld”. This means that the inherent productive capacity of the soils is low and therefore that potential crop yield or stock carrying capacity is also poor compared with competitive regions in the district, such as the Lowveld or the Springbok Flats. The only conventional agricultural operations in the Waterberg that show any degree of financial prosperity (and therefore sustainability) are those that are exceptionally well-managed by farmers with highly developed business acumen, or who have specialised in high technology niches like stud breeding or low volume, high value commodities (e.g. essential oils). In general, the |

Thank you for your comments. Noted.
Waterberg has been shown repeatedly to be unsuited to conventional, market-based agriculture.

4. Human Resources: The progressive collapse of conventional agriculture on the plateau has resulted in a large scale migration of displaced, unskilled agricultural employees and their families to Vaalwater, where there is now a large concentration of impoverished, undernourished, ill-educated people who are essentially unemployable, especially locally. This growing problem has been aggravated by an influx of refugees fleeing the tyranny prevalent in neighbouring Zimbabwe. The refugees, many of whom are relatively well-educated, but undocumented (and therefore ‘illegal’ immigrants), also lack traditional extended family support and are therefore desperate for employment at almost any price. This leads to their illegal employment by local landowners and other concerns, for wages unacceptable to the traditional residents of the region; and in turn to a growing ‘culture’ of xenophobia, tension and crime.

5. Infrastructure: A combination of a growing population, industrial development at Lephalale, subdivision of land into smaller portions and therefore higher rural population density - and, most importantly, incompetence and neglect by the relevant authorities - has resulted in a manifest and serious decline in infrastructure.

- Major arterial roads are falling into disrepair yet are poorly maintained, if at all;
- minor roads are often totally un-maintained for years on end, some having become all but impassable to ordinary traffic; in both instances, the number of fatal or serious accidents – caused mainly by the unsafe condition of the roads – is increasing sharply;
- Eskom’s power reticulation grid is, by its own admission, hopelessly over-extended; and is characterised by frequent outages, especially in the rainy season;
- Telkom has acknowledged that it will be unable to sustain its existing, fault-prone microwave-based telephony network; and that it does not plan to replace it with another system; and
- rural (primary) schools have declined in quality to the point where they do little other than to nursemaid children for a few hours a day. Most primary school leavers are functionally illiterate both linguistically and numerically. In Vaalwater, the state-run Leseding high school is almost completely dysfunctional, with high staff and learner absenteeism, weak to non-existent management and indifferent teaching by inadequate, unmotivated, under skilled staff to over-crowded and undisciplined classes. Only the quasi-private and privately operated schools are able to fulfil the constitutional rights of the youth to
6. Land Restitution: Most of the northern half of the Waterberg Plateau is now subject to a series of very large land claims, often overlapping, allegedly on behalf of communities evicted or otherwise dispossessed of their rights during the apartheid era. The inability of the responsible government department to pursue these claims, either by presenting incontrovertible evidence in their support or through funding of the purchase of available land, has led to a stalemate situation: land values have fallen, current landowners, while resisting the claims in the absence of evidence of their validity, have curtailed capital expenditure; and on the few properties whose ownership has been transferred to the claimants, productivity of any kind has ceased. This situation is not conducive to new project investment by any party seeking a sustainable return.

7. It is against this sombre, but realistic background that any development initiatives for the region should be contemplated. Clearly, development is sorely needed, together with a wide range of interventions that ought to be made by central, provincial and local government, but of which there is currently no discernible evidence.

In its favour, the Waterberg Plateau still retains large areas of relatively pristine, un- or under-populated natural environments which are host to a remarkable diversity of flora and fauna, draped across often breath-taking beautiful scenery. This and the proximity of the region to the large metropolitan areas of Gauteng, combine to define the Waterberg Plateau as an obvious location for the promotion of a carefully, sensitively planned, regulated and managed tourist development initiative, with a target market of discerning, wealthy, exercise-oriented visitors, probably including a large international component.

Moreover, many current landowners have invested in the area, not with the intention to generate a viable economic return, but rather for largely altruistic reasons: they enjoy nature, are concerned with conservation and often contribute significantly, on a voluntary basis, to the upliftment of the less advantaged sectors of the local population. These owners are generally highly educated and skilled in a diversity of professions, have a considerable disposable income and have repeatedly demonstrated a willingness to contribute these resources to the greater good, in return for security of tenure of their private properties. In the manifest absence of any state assistance in the region, these owners should be considered as an extremely valuable asset rather than as a selfish elite – which clearly, they are not. They should form an essential and integral part of any developmental initiative to promote and enhance the
## Tourism Potential of the Waterberg Plateau

1. The following are some of the service needs in the area:
   - A skills development centre;
   - improvements to the main and secondary roads;
   - a reliable electricity supply;
   - rural schools provide a completely inadequate education for farmworkers’ children so that they become unemployable. This is an urgent area requiring attention; and
   - a housing strategy needs to be formulated for rural workers.

2. There is competition for the following needs:
   - Irrigation extracting water from rivers; and
   - employment of illegal immigrants by agriculture undermines job creation for South Africans and generates security problems. A rural hospitality industry cannot succeed where there are security worries.

3. In terms of natural resources, the conservation sector would like to see the protection and conservation of natural habitat to ensure a continued rich biodiversity. The main issues that the sector is currently facing includes:
   - Residential and small property developments in the conservation areas;
   - banks being built on rivers without authority;
   - invasive and alien plant species – particularly bluegums in watercourses and ‘bankkrot bos’; and
   - noise levels of helicopters, microlights and quadbikes need to be regulated.

4. Strict zoning of conservation areas so that inappropriate development does not take place in these areas. Authorities are unwilling to prevent such inappropriate development taking place for various reasons. Zoning of the land would help overcome this.

5. In order to contribute to sustainability the sector can implement some of the following measures:
   - First step is to recognise that the Waterberg is ideally suited to nature, recreational and adventure tourism which utilises its wilderness status, natural beauty and biodiversity. It should not seek to compete with the Lowveld as a big five destination;
   - the Waterberg Brand needs to be defined and promoted to raise the competitiveness of the area;
   - a professional tourism information centre needs to be established by the municipality;

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Thank you for your comments. Noted.
and
• a debate needs to be started on the maintenance of minimum product standards and sound conservation practices. The Tourism Grading Council is not the answer to the maintenance of minimum standards – it has too many flaws.

6. There are two particular areas where seriously inadequate decision making by government has significantly hampered the development of the hospitality sector.
• Land Claims – protracted processes and absence of funding and support for new landowners have generated considerable uncertainty and stagnation;
• zoning of Conservation Areas – the absence of clear demarcation of conservation areas has opened the door for inappropriate residential tourism developments; and
• the global economic recession has put this process on hold but it will return in the near future.
The hospitality sector in the Waterberg does not come together to discuss the future. There is no appropriate forum for this to happen.

7. Other issues: Socio-economic issues are in many respects much greater than the physical planning issues.

Young people have little chance of competing in the market place with city children for tertiary education and employment opportunities and as a result are condemned to a life of hopelessness and despair. Very few school leavers enter either a tertiary education institution or formal employment. Unless a clear, practical and dynamic strategy is developed to address this situation, the Waterberg will not establish a viable society.

The Waterberg is becoming a rich man’s playground. Absentee landowners contribute nothing to the viability of the area. They do not create jobs and give little or no support to local institutions. This is a serious obstacle to the development of the area particularly in a country where access to land is such a key political issue.

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<th>Mining and Industry Focus Group</th>
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<td>Sasol Mafutha (Pty) Ltd; Sasol Mafutha Mining (Pty) Ltd; Sasol</td>
<td>1. Description of Sasol Interest and Activities in the Lephalale Area: Sasol owns a number of farms in the Waterberg</td>
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Mining (Pty) Ltd and Sasol Oil (Pty) Ltd

Dr. Carin Tredoux

Coalfielld in the Lephalale area and is also the holder of prospecting rights on 9 farms in the area. Sasol is investigating the possibility of establishing a large scale mining and Coal-to-Liquids (CTL) industrial complex with supporting infrastructure (including a residential development to house employees and support businesses). The project known as ‘Sasol Mafutha’ would produce approximately 80 000 barrels per day (bpd) of liquid fuel. The project is currently in a pre-feasibility phase and a final investment decision has not been taken.

Any final investment decision would be subject to, inter alia, final approval by the Sasol Limited Board as well as the granting of all necessary regulatory approvals, including approvals by the environmental authorities.

2. Sasol envisaged that for a project, such as Sasol Mafutha, in the Lephalale Area the following services will be required:
   - Raw water supply – anticipated to be supplied through the Mokolo Crocodile Water Augmentation Project (‘MCWAP’)
   - Electricity supply;
   - rail Infrastructure; and
   - road Infrastructure
   - A town including residential, business, recreational, health, civic and bulk services (Bulk services include water purification, water reticulation, sewerage treatment, sewerage reticulation). The town would be for employees of the petrochemical and mining complex, but also other support businesses, farm workers and other industries in the area.
   - Telecommunication services.

3. Existing infrastructure in the Lephalale Municipality is not sufficient to support the proposed development and these requirements are being taken into account in the project planning.

4. Sasol’s view on which service needs are common for other sectors and for which there may be competition includes:
   - Raw water supply in this water scarce area would cause competition between industrial development, mining, agriculture and human use. The cost of the additional water infrastructure that is required for new developments may result in an increase in the cost of water supply in the area which may impact on the prices present users are paying.
   - Rail logistics services from Lephalale to Thabazimbi have limited additional capacity and unless expanded, this will impact on mining and
industrial development focused on exports from the area.

- Different land uses will compete for space and if the spatial development framework for the area is not planned correctly or is not upheld, interactions between land uses could be limiting to some industries. An example may be the establishment of a town too close to open cast coal mining areas or on coal which will limit the ability to mine the coal or to place downstream coal users such as a petrochemical plant next to the coal.

- Skills will be required for the future development of the electricity, mining and petrochemical sectors. There may be competition for skills between the sectors if a number of large projects are developed at once. However there may also be synergies for the different sectors to co-operate with skills development and creating critical mass in terms of other service in the area.

- Services offered within a town (e.g. health services, accommodation services, bulk services, schooling, policing, civic services) may be insufficient due to the increased demand if a number of large industrial projects are executed at once.

Sasol would require coal and water for any proposed development in the Lephalale Area. As a responsible corporate citizen we would be concerned about ambient air quality, water quality, visual aspects and the environment in general.

We envisage that our proposed developments can impact on various aspects and we anticipate to conduct the following specialist studies as part of our planned EIA/EMP studies in future:

- Socio-economics;
- air quality;
- visual;
- noise;
- greenhouse gas emissions;
- health risks (community);
- cultural heritage;
- waste
- surface water;
- groundwater;
- biodiversity;
- soils and land capability;
- traffic; and
- blasting.

5. The main environmental issues that affect the sector in the area are:

- Quality and Quantity of coal resources and
6. **A comprehensive Spatial Development Framework (SDF) is an essential planning tool.** The Lephalale SDF is a good example of such a tool and considered the following:
- The distance that employees of mines and industrial plants would need to travel from their homes in order to get to work. This should not be excessive,
- The wind direction and the impact that open-cast mines, beneficiation plants, industrial coal users have on residential areas in terms of noise and air emissions.
- Buffer zones between industrial/mining areas and residential areas to ensure safety and limit the impact of noise and air emissions.
- Infrastructure corridors to allow for efficient movement of electricity, water, coal, materials, goods, products and people while controlling the extent of the impact of the corridor on other sectors such as farming, conservation, tourism and housing.
- Not to build on or too near coal as it sterilises a national resource.

6.1 **A comprehensive mining development plan.** Currently a large number of prospecting rights have been issued to an equally large number of companies or individuals. Most of these rights will have been issued with similar requirements in terms of the prospecting period and when mining should occur before the right holder loses their rights. This pressure to mine, plus the lack of water, lack of a local user of the coal and lack of rail and other infrastructure capacity could result in rash decisions by prospecting rights holders to establish infeasible mines. The net effect could be environmental damage and result in a negative perception of mining and industrial development in the area.

6.2 **A comprehensive town development plan in accordance with the SDFs and taking into consideration the possible future developments in the area.** Currently land speculation and multitudes of applications to develop new towns (some of which are blatantly in contradiction of the Lephalale SDF) and without a sufficiently inclusive process, involving the local municipality and other stakeholders who are targeted as the principal users of such towns, will negatively impact development in the area. Such a development plan should be based on a coherent design concept reflecting the following: needs of the area including temporary construction housing needs and the socio-economic impacts of these, integrated communities, safety, security, sustainability, and should have the potential for growth.
6.3 A comprehensive Environmental Management Framework. Currently environmental overload characterised by the duplication of environmental studies and environmental fatigue within the community is a negative consequence of an area experiencing rapid growth. When the community stops participating in the EIA process or refuses access to properties by environmental specialists or is generally negative as they are not shown the bigger picture, this will have a negative consequence for Sasol Mafutha.

6.4 A skills development plan for artisans and engineers to execute and operate the proposed projects in the area. This plan should encourage improved mathematics and science participation and education at schools which would increase local employment and add to the upliftment of the local communities.

7. Compliance with legislative requirements, in particular the following actions related to sustainable development are highlighted:
   - Complying with the duty of care principle with regards to the environment and natural resources.
   - Ensure that there is a robust business case i.e. a need for the products, a robust technology, skilled operating personnel, ability to meet environmental restrictions and logistics channels to get products to market and feedstocks to the plant.
   - Ensure that there is a clear plan to limit the negative and enhance the positive socio-economic impacts. This includes the support of on-going training, skills development, encouraging job creation for locals, local sourcing of services, local enterprise development.
   - Continual improvement of the business through efficiency improvements and producing higher value added products. This is done through continued research and development, engineering focused on optimisation and seeking opportunities for downstream business development.
   - Encouraging broad based black economic empowerment (BBBEE).
   - Complying with and following local development plans e.g. SDF.
   - Encouraging commitments to rehabilitation after closure of developments
   - Encouraging investment in infrastructure and the maintenance thereof.

8. To date Sasol’s experience with government decision-making in the Waterberg area has been limited, but thus far we have experienced good cooperation from the Waterberg district municipality, the Lephalale Local Municipality and the Limpopo
Provincial Government.

However, if all the proposed developments in the area proceed, additional resources will be needed on a local municipality level to facilitate the planned developments.

At present there is not sufficient communication within the industrial and mining sector in order to consider that there is consensus relating to both the industrial development end state and the potential for cooperation in terms of sustainability and efficiency issues e.g. skills development, common infrastructure, housing, etc.

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<th>Comments</th>
<th>Responses</th>
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<tr>
<td>John Miller</td>
<td>1. The most important service needs in the area are: Water, water, water – this cannot be emphasized enough! Both small projects and large projects must be considered in the context of the entire District, and the Waterberg plateau itself. Even if there is sufficient water for a small or large project to operate, one must take into account the entire water supply. Using aquifers and ground water for one project takes water from another. The provincial authorities don’t seem to recognize this point. The Modimolle-Vaalwater road is in terrible condition, and its repair should be regarded as a major priority. The dirt and gravel roads in the area have been neglected for many years. They require regular maintenance, not only a bit of scraping when residents yell loud enough. Signage regulations must be enforced. The signs at all entrances to Vaalwater are ugly and reflect poorly on the town. 2. Major attention must be paid to the proliferation of exotic and invasive vegetation. They deplete scarce water supplies and destroy the area’s vital grasslands. All too easy approval by the province of residential developments that deplete the water supply. Once approved, there is absolutely no monitoring and enforcement by the authorities, so that a developer does whatever he wants to his land, no matter what was ordered in the record of decision. The character of the Waterberg is threatened by the proliferation of unapproved and/or land destroying land developments. 3. Some of the main developmental planning issues in the area include lack/no land controls and on environmental enforcement. 4. Government decision-making is based on ticking boxes. Substantive issues are ignored.</td>
<td>Thank you for your comments. Noted.</td>
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| Anne Scotting | 1. The water supply is inadequate, and in poor condition containing all sorts of undesirable elements. It is generally cut off during the day affecting all business and residents. Water for Leseding is trucked in, often having been pumped directly from a borehole that takes from the river. Totally unacceptable.  

Sewerage Treatment, the plant is grossly out-dated and under spec for the human waste generated. There is also no sewerage for the informal settlement, and indeed for parts of “developed” Leseding. The water seeping into the underground water supply is poisoning the water, and ultimately the water supply. There are pumps that are in need of repair, but nobody available with the necessary experience to repair them. There was a business in town that used to carry out this function, but the municipality did not pay his accounts so he stopped the service.  

Electricity is very unstable, but I understand that Eskom is upgrading the Vaalwater substation and that there is another one being built some 30ks away from here which should sort out the problems.  

Roads in, and around the town are in a shocking, and dangerous state. There are rarely any repairs carried out and the roads continue to deteriorate to a worse level. There should be paving along the roads in Vaalwater as well, ultimately saving the municipality money by not have to cut grass or verges. Particularly as their lawnmowers etc. are more than often broken.  

2. Tourism. Passing Traffic. All businesses in the town itself compete for service needs.  

3. Clean water. The issues are as abovementioned. Lack of supply, extremely bad quality etc.  

Air quality is affected by fire cooking and heating in Leseding and the informal settlement. The wood is generally stolen from farms close to the locations.  

The municipal dumping site. It has been fenced off late last year. It is a landfill site. But if we could introduce recycling which could feed small business enterprises that would be a community advantage. A levy should be considered for the surrounding game farms that dump their rubbish as well.  

4. In order to achieve sustainable development in the area the following factors should be considered, water contamination due to lack of sewerage facilities. Wood depletion on local farms, cutting down of trees for wood. Poaching.  

5. A development to build more housing in Leseding section 4 has by all accounts been approved, yet | Thank you for your comments. Noted. |
without water supply, sewerage connection, and electricity connection. It begs the question – who would pass such a development with the exclusion of basic needs?

6. The sector must promote Sustainable job creation allied to the tourism industry, concentrating on small business development, with a particular emphasis on recycling of waste in order to contribute to sustainable development. Government decision making is non-existence in the district. There is an air of complete apathy should you fortunate enough to make any contact with anyone in the first place.

7. I believe that there is consensus within the sector in respect to its future. There are so many residents of both Vaalwater and Leseding that are extremely frustrated and disappointed with broken promises, no action, no improvements etc. that it may take time to re-enthuse people. However I believe it can be done.

8. Noise levels. There is a huge amount of large scale transport that uses Vaalwater as a short cut which is a serious noise factor. There are also some business in the town, i.e.: pubs that create a noise problem and they are completely uninterested in confirming to acceptable guidelines. Fines should be issued in these instances, but our police would in all probability be lynched should they make any move to bring about order and compliance.

9. Policing. Our local police force is stretched beyond the limit, particularly during the night shift. The day shift seems to be of a level enough to handle things. Invariably there is only one policeman on duty at night, with one vehicle available, and over weekends particularly this is not enough. The police station telephone line is also out of order most of the time because the bill has not been paid. This doesn’t make it easy for either party involved in an incident, whatever the nature.

10. Crime – is on the increase. Generally petty crime of an opportune nature, however house break-ins are on the increase, and the violence that goes with it will follow closely behind. Foreign nationals, illegally in RSA, are numerous in Leseding and the informal settlement. We are looking seriously at an outbreak of Zenophobia in the not too distant future.

11. Education – the government schools here are grossly understaffed. The cooking for the children is on open fires by volunteer mothers. The facilities are extremely under provided. The educators themselves are very committed but with overcrowded classrooms and lack of facilities they are really struggling, and they get little, if no, support from the department of
education.

12. The informal settlements – this is an issue, mainly because it is a health hazard to the individuals within the settlement. Added to that they also produce human waste which is having a negative effect on the underground water. By all accounts there was land purchased to the south eastern side of Vaalwater, adjoining Leseding 1 which was destined for RDP houses, but the story goes that the government decided it could make money out of the land and therefore reneged on housing development which in turn led those that were waiting for RDP houses to go ahead and erect the informal settlement. I don’t know how much truth is in this, but I have heard it many times from the residents of Leseding who are extremely angry with the government for letting them down and overlooking them “yet again”.

<table>
<thead>
<tr>
<th>Department of Public Enterprises</th>
<th>Eskom and Transnet are operating in the area.</th>
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<tbody>
<tr>
<td>Dr. Andrew Shaw</td>
<td>Uncertainty of future power stations in the area (in Botswana) could create unintended consequences. It is suggested that Environomics work closely with Eskom in this regard.</td>
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<td>Thank you for your comments. Noted.</td>
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ROUND 2: PUBLIC PARTICIPATION PROCESS

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<tr>
<th>Conservation Focus Group</th>
<th>Comments</th>
<th>Responses</th>
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<tr>
<td>Mokopane Biodiversity Conservation Centre</td>
<td>1. I was surprised to find information not reflected on the maps which are of critical importance (but as you say they are still in development phase). I am concerned that the areas of Ecological important are determined by the protected areas only and do not consider the actual Ecological values. If this is done it could then land up excluding a number of presently protected areas.</td>
<td>The comments you sent through were received and we have taken them into consideration.</td>
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<td>Mark Howitt</td>
<td>2. One major aspect that is at present missing on the maps is the Makapan Valley World Heritage Site and buffer Zone declared in 2005 by UNESCO and by RSA in Dec 2007.</td>
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<td>3. We also need to include the Mogalakwena Green Corridors which have been Identified where only eco-tourism / land protection is the preferred development.</td>
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<td>4. One aspect that I would like to see happen is that the entire Nyl River system should have a protected status – (what a shock to see the potential threat of a coal field in this area).</td>
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<td>Welgevonden PGR, Conservation and Tourism</td>
<td>1. I believe that the area should have solid development guidelines laid down together with a list and time line on the aspects that are possibly hampering sustainable development and UTILIZATION of the area. I am not sure if it falls in the scope of this report but dealings with the local municipality and other government organizations are generally poor. These persons need to be efficient and know what they are doing. Procedures, regulations etc. need to be user friendly and not time consuming e.g. Ellisras municipality has a single email address and staffs don’t have access to email. Nature conservation Ellisras has no email, we still fax and hand deliver application forms. Improvements to road infrastructure is a big concern from a tourism point of view as this is possibly the negatively commented on aspect from visitors, both local and international, visiting the reserve. We need to realise that Africa is not a first world country but we can use a number of the technologies and ideas and apply them here locally. Practical, sustainable and realistic solutions.</td>
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<td>André Burger</td>
<td>2. In order to get from where we are to where we want to be, we can start with:</td>
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<td>• Improve Infrastructure – roads, electricity, town planning, sewerage and waste management, security, efficient service delivery and government departments; and</td>
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<td>• Most of the other aspects should then be encouraged and follow.</td>
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<td>3. We mostly need road infrastructure, Competent government authorities with enough competent employees to do the work using modern technologies and applying practical, implementable laws, regulations etc. that are policed.</td>
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<td>4. In order to achieve sustainable development in the area the following factors should be considered, water, Sewerage, fuel – wood is being collected on all farms around Vaalwater illegally but the people are desperate. Aesthetics of the area and the sense of wilderness also need to be taken into account.</td>
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<td>5. Some of the critical socio/economic elements that need to be looked into in order to achieve sustainable development in the area include:</td>
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<td>• Job creation – persons are living in an area with relatively few job opportunities. Possibly caused by the number of RDP houses being build that has led to a community explosion in an area that doesn’t have the industry etc. that could provide sufficient jobs the knock on effect of this is poverty, crime and an unstable community; and</td>
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<td>• town development – don’t put the squatter shacks next to the main road through town especially when tourism is a major economic</td>
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The comments you sent through were received and we have taken them into consideration.
6. The main constraints in the area are water availability, poor road infrastructure, unemployment, young uneducated population, work ethic of general population, potential for increase in crime due to poverty and unemployment.

Opportunities: Tourism, Conservation, hunting, adventure sports, agriculture, fishing, game industry.

| Waterberg Nature Conservancy | 1. You should establish ways and means to preserve the pristine and conservation areas of the Waterberg Plateau. Your decisions should be based on long term goals and objectives, not short term, expedient ones. You can start by protecting the Waterberg Biosphere Reserve from dramatic changes, large and medium scale developments. The Biosphere should be better defined and provided with strict development constraints. Most importantly, the Biosphere and the Waterberg District should have the means to enforce adherence to development regulations. |
| John Miller | 2. No more studies. Identify champions, more than one, at the national, provincial, and local levels. The champion will regard his most important job as leading the environmental protection of the Waterberg. He/she will have experience, training, education, resources, and a mandate to advocate on behalf of the environment. The champion should lead the effort to define conservation areas and identify the activities permitted in those areas. Establish the appropriate regulations. He/she must have the authority to enforce the regulations. Some conservation areas should be sacrosanct. That is, development proposals (not only private developers, but also from the likes of Eskom) should not even be accepted for areas such as the Greater Mokolo Nature Reserve, the Mokolo Dam itself, Nylysve Nature Reserve, and for the entire Waterberg Biosphere Reserve. |
|  | 3. With regard to our specific need we would like to see implementation of plans. Compliance with regulations. Enforcement of plan conditions. |
|  | 4. In order to achieve sustainable development in the area, factors such as decisions regarding permissible types of economic development according to environmental criteria require mature, objective, selfless, long-term consideration should be considered. |
|  | 5. In an area of exceptional natural beauty, do not allow developments that will destroy it. Be realistic about job creation and skills training. |
|  | 6. Constraints in the area: |
|  | • Limited underground water resources; |
|  | • Generally poor soil quality; |

The comments you sent through were received and we have taken them into consideration.
• poor and deteriorating regional and local road, power and telecommunications infrastructure;
• poorly skilled existing workforce and poorly educated school-leavers; and
• indifferent and unqualified local municipality (Modimolle) and poor to absent service delivery.

Opportunities:
• The Plateau still boasts several areas of almost pristine natural beauty; and many other areas where private land ownership has restored historically degraded veld to something approaching its natural state;
• the area is within relatively easy driving distance of the country's largest tourism market – Gauteng;
• there is a well-established community of eco-tourism and hunting establishments, which cater for both domestic and international tourists and are the basis for a stable, sustainable, relatively well-remunerated and increasingly skilled, though not large employed population;
• the Waterberg Biosphere Reserve is an established, internationally known, UNESCO-registered biosphere reserve with clearly defined objectives and a broad constituency base, and which enjoys generally favourable support among the local community; and
• the Waterberg Nature Conservancy is an active, community-engaged, voluntary and non-profit organisation.
• The Waterberg Welfare Society is a (largely) privately-funded welfare organisation that has developed a formidable reputation for, and community endorsement of its objective of providing substantial, continuing support to members of the community living with HIV/AIDS; and to the orphaned offspring of those who have succumbed to the condition.

Opportunities potentially in conflict with each other:
• Mining versus conservation and ecotourism
• Energy versus conservation and ecotourism
• Residential tourism developments versus conservation (of the very environment that developers promote to investors in their schemes)
• Mass job creation expectations versus the reality of limited employment opportunities
• Urban migration and urban growth versus failing infrastructure and service delivery
• Mass, low-priced mainly domestic tourism versus selective, high-priced, mainly foreign tourism.

| WESSA | 1. Aim towards a Waterberg where water is reserved primarily for agriculture, human consumption and | The comments you sent through were received and we |
## Environmental Management Framework for the Waterberg District

**Public Participation Report**

<table>
<thead>
<tr>
<th>Luke Perkins</th>
<th>ecological systems. Water for tourism must be strictly limited.</th>
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<td>2. Achieve a complete re-orientation in our perception of the Waterberg – instead of a rich, wet, fertile area with virtually unlimited mining and tourism opportunities, it should be seen as a fragile ecosystem, usually in drought conditions, and with dry conditions predicted to get worse under climate change conditions. Future mining and tourism activities should not only be limited, but existing ones will have to be reduced.</td>
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<td>3. Impose a moratorium (a complete ban) on any future development for tourism, ecotourism, golf courses, hotels and conference centres.</td>
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<td>4. Assess how much water is supplied by the Waterberg system in a dry year and take this as the norm. Then re-assess how many water use permits can be given to agriculture (this should be done by Water Affairs).</td>
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<td>5. Attempt to assess the extent of illegal water use, i.e. dams, boreholes etc. operated without the appropriate licence. From this, either:</td>
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<td>a. Prosecute the offenders and remove the illegal structures, or</td>
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<td>b. Reduce the number of legal permits issued.</td>
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<td>6. An assurance by the national and provincial Departments of Environmental Affairs, Water and Forestry, Tourism, Mining, and Energy, that the Waterberg will be managed in the future so as to maintain its water delivery systems, control and reduce pollution, and control and reduce soil erosion.</td>
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<td>7. Recognition by the above Departments that the proper use of the Waterberg is for agriculture, human settlement, LIMITED tourism, and maintenance of natural areas, and specifically NOT for mining and large-scale tourism. Use of the Waterberg for large-scale tourism and mining will lead only to short-term financial gain and long-term degradation of the environment and water-producing capacity of the area, rendering it largely useless in the future.</td>
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<td>8. In order to achieve sustainable development in the area the following should be considered:</td>
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<td>• Maintenance of the water-producing capabilities of the Waterberg;</td>
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<td>• control of pollution and soil erosion; and</td>
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<td>• “Sustainable development” as understood by most interested parties merely means “development”. It must be clearly understood that “SUSTAINABLE” development means sustaining ecological integrity INDEFINITELY, and this can only be achieved with extremely limited development options. The Waterberg is</td>
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<td>have taken them into consideration.</td>
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already over-developed, the human carrying capacity has been far exceeded, and sustainable development is completely impossible unless most of the EXISTING golf courses, hotels, mines, and “eco-estates” are removed.

9. Most of the EXISTING golf courses, hotels, mines, and “eco-estates” must be removed. Sustainable development is impossible to achieve under the present status quo, as the water resources are over-stretched (if this were not true, why it is being contemplated to raise the height of the Donkerpoort Dam?)

10. Key opportunities: Preserve the Waterberg for posterity by completely re-ordering our outlook on the Waterberg; to see it afresh as an essentially dry area; to see it as an area likely to become drier due to climate change; and to use it accordingly with a much lower human impact.

11. Key constraints: the difficulties most people will have in accepting the above premise; the inherent optimism in people that the Waterberg will always yield high quantities of water, the misconception that droughts are the exception and not the norm; and human error in designing and maintaining safe mining and other industrial operations in the area.

12. The opportunity to conserve this area sustainably is in conflict with the short-term job opportunities undeniably appealing to politicians.

13. It may seem strange to say that human impact must be reduced, but this is the only conclusion I can reach based on the existing Science.

13.1. Eastern areas of South Africa are predicted to get wetter, and western areas drier. The Waterberg is in the west. Climate Change must be taken into account, by making future rainfall figures more pessimistic than they otherwise would have been.

13.2 We are currently in a wet period and human memories being short, it is hard to persuade people that years and years of drought can and do happen in the Waterberg. However, this is the sad truth. Future plans must be based on low rainfall figures – if we do get a wet year then this is a bonus. We have tended to base our plans on wet years, thinking this is the norm. It is not.

13.3 It may also seem strange – very strange – to suggest that hotels, golf courses, mines etc. must cease to operate. This is obviously unlikely to occur. But the question being posed is “What is necessary for sustainable development?” Please note the question is not “What is needed for economic growth to occur?” or “What is needed to maximise jobs in the area?” or “What would politicians and people like to see?” I can give the
answers to these too, but they are different answers. Interestingly, the effects of massive short-term job creation are at odds with sustainable development, but those of sensitive long-term job creation are similar. (In other words, damaging the environment as we are now doing will actually threaten jobs in the long term. Unfortunately, most of us worry only about the short term).

Lastly, I cannot answer the question “Can this be done? Or “Who will do it?” These are more difficult questions, but the fact that they are difficult does not mean that the conditions for sustainable development are not far more severe than is currently generally assumed.

| Richard Wadley | 1. Presumably, the objective is to assess the socio-economic development potential of various parts of the Waterberg District in a way that takes account of critical environmental factors and the impact on the local/regional environment of different types of economic activity. Ideally, any permitted type of development would be permitted only in areas where its environmental impact is either negligible; or irrelevant due to past environmental degradation; or readily manageable and enforceable.

In reality, this is not possible: mining of coal, for example, can only take place where nature has created a coal deposit; and crop agriculture can only be practised where the soil, water and climate are appropriate to this purpose.

However, given the national scarcity of environmentally pristine, or almost pristine locations, the preservation of such places, where they do occur, should take precedence over other possible activities that might be planned for these areas. The Waterberg Plateau, as an example, contains several areas that fit the description of “environmentally near-pristine”. They should be accorded the status of Protected Areas in order to ensure that no short-term, or politically expedient decisions can be taken by ignorant, indifferent, or self-interested parties that could jeopardise them. To this end, the Waterberg Biosphere Reserve, already enjoying some status as a (rather poorly) defined conservation area, should be better defined, provided with strict development constraints, perhaps even in zones of varying severity; and equipped with the means to enforce their adherence.

2. Firstly, there has been too much talk and too little action or management intervention. It is too easy to convene yet another workshop or commission yet another survey. What is needed is the political courage to take the results of these studies, and to implement them. Almost any action will be more constructive than the decade of inertia that has passed – inertia that has not been shared by developers – be they

| The comments you sent through were received and we have taken them into consideration. |
residential holiday resort entrepreneurs or State-owned entities - who have exploited the vacuum created by governmental indecision to continually erode and degrade key areas of conservation importance.

So,

**Action Step 1**: Resolve to take the results of this survey, in conjunction with those of its predecessors (which will all say more or less the same thing) – and **implement them**. Define different parts of the District according to their greater or lesser importance environmentally and then precisely define the activities that may or may not take place within each one – acknowledging that in some very special cases, genuine national strategic interests might overrule these definitions.

**Action Step 2**: Provide those responsible for defining these different zones and associated allowable activities with the authority and ability to **enforce** them – irrespective of the political power of those who would flout the rules. For example, it **should not be permissible** for the State-owned mining entity AEMFC to even **contemplate** exploring for or mining minerals in the Mokolo Nature Reserve or at Nylsvley. Both these national treasures fall within the Waterberg District.

**Action Step 3**: Develop a programme to **educate** the general public about the importance of governing economic development according to environmental impacts; enlist public support for these programmes; publicly condemn (name and shame) any developer who attempts to contravene or evade restrictions imposed on development.

I rank this as a third step because, while public consultation is important, it is likely, if awarded the highest priority, to lead to so much smoke and noise that the only outcome is – inaction. Rather, the District Municipality should have the courage to take the lead – **implement and enforce** programmes based on sound research and then **educate** the public as to why these are appropriate. (Developers should be regarded as un-educatable: they have only one interest – their own financial gain).

3. I need to see a developmental framework for the District that creates **realistic** economic development and employment-creation opportunities, but in ways that are genuinely, tangibly, sensitive to their environmental impact(s); and therefore, that areas classified according to varying degrees of environmental fragility and importance may only accommodate certain types of developmental intrusion.

I would like to expect that this time around, the District is serious in its intent to develop a sound, Environmental Management Programme and to ensure its implementation and enforcement. My fear is that this will
just be another episode of taxpayers’ money being squandered on a survey that those who commissioned it have neither the courage nor the interest to take seriously. I would be overjoyed to be proved wrong.

4. In order to achieve sustainable development there is need to create economic development opportunities that depend on the conservation of the environment for their sustainability, rather than those whose prosperity is impeded by conservation issues.

Do not politicise the issue by making unrealistic claims about job creation; about the agricultural potential (e.g. for land claimants) of areas with little or no such potential; or about demonising those who do practise sustainable conservation-based activities but are of an unfavourable political or ethnic orientation. The consequences of national and local governmental policies, their action or inaction now, will be felt by all future generations, long after the present political dispensation has passed into history. Decisions regarding permissible types of economic development according to environmental criteria require mature, objective, selfless consideration. These should be attributes of elected officials, who are supposed to have the national interest uppermost; but they are rarely words applicable to politicians anywhere. The decisions, therefore, should be left in the hands of the bureaucrats.

5. The most important is simple: Do not kill the geese that lay the golden eggs!

- In a major coalfield, be realistic and accept that the extraction of coal must be the predominant activity, albeit subject to practicable constraints;
- in an area of exceptional natural beauty, do not at all allow developments that will destroy it; and
- in areas where developments in coalfields (for example) compete with sites of international heritage importance, there may be an argument for co-existence, but only if the former can be carried out in a way that genuinely does not jeopardise the latter (it is not sufficient to take the developer's word for this).

Do not assume that all locally-generated work-seekers can or should be employed locally – and do not lead them to expect that this might be the case. Even in a socially responsible free market economy, jobs are created where it makes economic, rather than social sense to create them: people are generally more amenable to migration than material resources, infrastructure and markets.

6. On the Waterberg Plateau (roughly, the area above 1000m amsl – which, also roughly, corresponds with the planned boundary of the Waterberg Biosphere), the key constraints are:

- Limited underground water resources;
generally poor soil quality;
generally poor soil quality;
poor and deteriorating regional and local road, power and telecommunications infrastructure;
poor and deteriorating regional and local road, power and telecommunications infrastructure;
poorly skilled existing workforce and poorly educated school-leavers;
poorly skilled existing workforce and poorly educated school-leavers;
indifferent local municipality (Modimolle) and poor to absent service delivery;
indifferent local municipality (Modimolle) and poor to absent service delivery;
politicised, uncritical, often unsubstantiated land restitution process, under the control of a dysfunctional government department, leading to overlapping claims, uncertainty, deferred investments, falling land prices, unemployment;
politicised, uncritical, often unsubstantiated land restitution process, under the control of a dysfunctional government department, leading to overlapping claims, uncertainty, deferred investments, falling land prices, unemployment;
influx of unregistered, illegal immigrants prepared to work (illegally) for exploitative wages, causing displacement of local workers and creating growing xenophobic attitudes; and
influx of unregistered, illegal immigrants prepared to work (illegally) for exploitative wages, causing displacement of local workers and creating growing xenophobic attitudes; and
increased incidence of violent crime (including poaching), with inadequate public policing, leading to insecurity, vigilantism and (usually unwarranted) racial polarisation.

But there are also opportunities:
The Plateau still boasts several areas of almost pristine natural beauty; and many other areas where altruistic private land ownership has restored historically degraded veld to something approaching its natural state;
The Plateau still boasts several areas of almost pristine natural beauty; and many other areas where altruistic private land ownership has restored historically degraded veld to something approaching its natural state;
the area is within relatively easy driving distance of the country's largest tourism market – Gauteng;
the area is within relatively easy driving distance of the country's largest tourism market – Gauteng;
there is a well-established community of eco-tourism and hunting establishments, which cater for both domestic and international tourists and are the basis for a stable, sustainable, relatively well-remunerated and increasingly skilled, though not large employed population;
there is a well-established community of eco-tourism and hunting establishments, which cater for both domestic and international tourists and are the basis for a stable, sustainable, relatively well-remunerated and increasingly skilled, though not large employed population;
the Waterberg Biosphere Reserve is an established, internationally known, UNESCO-registered biosphere reserve with clearly defined objectives and a broad constituency base, and which enjoys generally favourable support among the local community;
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there is an active, community-engaged, voluntary and non-profit organisation called the Waterberg Nature Conservancy, some of whose members were critical to the founding of the Biosphere, and which in most respects shares the interests of the Biosphere, albeit with an emphasis on conservation rather than social issues;
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the Waterberg Welfare Society is a (largely) privately-funded welfare organisation that has developed a formidable reputation for, and community endorsement of its objective of
providing substantial, continuing support to members of the community living with HIV/AIDS; and to the orphaned offspring of those who have succumbed to the condition; and

• prior to the advent of land claims, there was a strong move towards the consolidation of many private conservancy properties into a single large area, which had (and would still have) the potential to create a nationally important locus for ecotourism. This in turn could offer enhanced employment and training opportunities for local work-seekers.

7. Conflicts for opportunities in the area can be found amongst the following:

• Mining versus conservation and ecotourism;
• residential tourism developments versus conservation (of the very environment that developers promote to investors in their schemes!);
• unrealistic “green movement” conservation versus national strategic necessity;
• mass job creation expectations versus the reality of limited employment opportunities in restricted categories;
• urban migration and urban growth versus failing infrastructure and service delivery, and competing growth points (Vaalwater vs Lephalale and Modimolle); and
• mass, low-priced mainly domestic tourism versus selective, high-priced, mainly foreign tourism.

T Tlailana

1. Your questionnaire should be send to all stakeholders from the community grassroots level and to all game farms (reserves) under Waterberg district municipality. The reason being is to obtain as much information as we can.

2. The questionnaires can be distributed to them via e-mail, fax etc. and be engaged and form part of the plenary meetings of the projects.

3. Community developments such as parks and therefore environmental quality should be priority, also to have a better water circulation.

4. In order to achieve sustainable development in the area, the following environmental factors should be considered:
   • Air pollution;
   • water utilisation;
   • water pollution;
   • conservation areas;
   • shortage of land (residential area);
5. Key opportunities and constraints in the area include:
- Employment;
- Economical investment; and
- Area development.

6. Political parties are in conflict with each other for opportunities in the area.

Dr Salomon Joubert

1. At present the EMF involves an assessment of the problems being experienced, leading to the identification and prioritisation of problem areas and ultimately to develop a framework that will integrate policies and frameworks, and align different government mandates in a way that will streamline decision-making to improve cooperative governance and guide future development in an environmentally responsible manner” (Information and News 2: May 2010). In addition a whole series of very noble objectives, underpinned by ‘sustainable development’ are given.

This process was commissioned by the National Department of Environment Affairs, the Limpopo Department of Economic Development, Environment and Tourism and the Waterberg District Municipality. The process is being driven by an impressive Project Team, covering a broad spectrum of very relevant interests to comply with the objectives. The initiative is acknowledged as a bold and welcome move towards a more rational approach towards societal and environmental demands and challenges.

Judging by both the scope of the project and the Project Team it is obvious that the clients (DEA, LEDET, WDM) have committed considerable funding (from taxpayers coffers) towards the project. Participation by the public is on a voluntary basis and any costs in terms of time, transport, etc. are for the account of the participants.

The EMF falls within a family of similar environmental legislation, including Environmental Impact Assessments, Strategic Environmental Planning, etc. The formulations of these approaches are relatively new for South Africa, dating back some 20/25 years. Unfortunately, the initial optimism and enthusiasm with which the new trend was welcomed has withered away with the frustration and disappointment caused by the non-implementation / non-abidance by these processes in the past.

Where do we go from here? I would like to believe (demand?) that we have committed ourselves to a process that will fulfill its mandate: “align different government mandates (to achieve) streamlined decision-making to improve cooperative governance.”
and guide future development in an environmentally responsible manner”.

2. At the moment it would appear that any form of decision-making and at all tiers of formal government (National, Provincial and Local) are fragmented and disjointed. The noble goals of this EMF process cannot be achieved without the following:

- A clear statement of the frustrations, problems and expectations of the people who are experiencing the problems and frustrated expectations;
- a public statement by the authorities that they have accepted the recommendations of the EMF process and that they have noted the problems and frustrations 'on the ground';
- a public commitment by the authorities to abide by the recommendations, to subject decision-making to cooperative governance and to conduct such governance in a fully transparent manner; and
- a firm commitment by the authorities to implement the recommendations of the EMF, as approved by the participants.

Failure to meet these prerequisites will amount to nothing but a waste of time and taxpayers money!

3. In terms of conservation and tourism the broad-based needs and expectations include good and reliable services and infrastructure (a well-maintained road network, potable water and a reliable power supply).

4. The Modimolle/Naboomspruit area lies on the divide between the Waterberg escarpment and the Springbuck Plains. The major drainage system resulting from this situation is the Nylsvley. This drainage system is noted for its broad, grass-covered basin and associated wetlands. The wetlands attract vast numbers of birds, both in terms of species richness and numbers, and a large section of the drainage, incorporated in the Nylsvley Nature Reserve (NNR), has gained international status. The NNR is recognised by the Ramsar Convention as a wetland of international importance, and according to this convention is entitled to special protection. The NNR also accommodates a number of rare herbivore species, such as roan antelope and tsessebe.

The towns of Modimolle and Naboomspruit lie in the catchment of Nylsvley and any form of pollutants, either directly into the water or through leaching (e.g. agricultural pesticides, fertilizers) or other forms of environmental degradation could pose severe problems for the NNR.

In addition to the NNR, conservation and nature-based recreational areas abound in the area and represent
important tourist destinations.

5. The key opportunities for the area are primarily related to conservation. The healthy climate (malaria free, seldom any frost), landscapes ranging from the Waterberg escarpment to the Springbuck plains largely still in a natural state and the abundance of wildlife are all major attractions. Recreational facilities attract large numbers of visitors throughout the year – the extremely hospitable all-year climate makes it possible to visit the area at any season of the year.

A huge potential opportunity that has not been fully appreciated, is that of an overseas market. The "birding" industry has become one of the greatest international pastimes and the acknowledgement awarded the NNR through its Ramsar status still needs to be exploited. Failure to do so has largely been due to the inability of the Provincial authorities to provide suitable facilities and launch an appropriate marketing campaign. This sorry state of affairs also applies to the neglect of the ecological management of the NNR and were it not for the interventions of the Friends of Nylsvley, an informal, voluntary association of enthusiasts, very little would have been done in the reserve over the past 10 years, or more.

6. A major concern in terms of rational and sustainable development lies at the very root of this EMF exercise: the lack of cooperative planning and decision-making. This applies to the national, provincial and local levels. May this EMF go some way towards resolving this issue!!

It is imperative that the private sector also be included in a cooperative manner: business chambers, agricultural and conservation associations, industrial and mining interests and other private enterprises need to have a fair share in the decision-making process. After all, it is their interests that are at stake. The single most critical social problem revolves around the influx of illegal, or fortuitously 'legalised', immigrants, in particular from Zimbabwe. Problems associated with this situation include crime, loss of employment opportunities for locals and the shortage of suitable accommodation, with associated pressure on stressed resources.

7. The Limpopo Province, and also the WDM, is richly endowed with two resources that are in direct conflict with one another, i.e. a particularly rich biodiversity, pristine landscapes and spectacular scenery, on the one hand, and rich and varied mineral deposits, on the other. The natural environment is already a major attraction for visitors from the large urban centers (e.g. Gauteng) and has the potential of accommodating substantially more. Developments of this nature have the advantage of being dependent on sustainability for their perpetuation. Mining has the attraction of vast incomes, but of limited
duration and is therefore not sustainable. A major concern at this stage is the prospecting for coal in the Nylsvley catchment. Prospecting is a precursor for mining and any form of mine in the fragile Nylsvley catchment could mean the end, or at least the severe mutilation of an ecosystem that has already gained international acclaim!

Assurances of the protection of such invaluable natural assets are of little comfort if rich deposits are found. Last year, on a public occasion, the Minister of Environmental Affairs, Ms Sonjica, assured an audience that the coal mines upstream along the Limpopo River, above the Mapungubwe National Park, would not be commissioned. If my understanding is correct, work on the mines is going ahead at a furious rate and excavations are expected to start in six months – without any of the prescribed environmental procedures being completed!

If my facts are correct, the above situation serves to shatter confidence/credibility and causes anxiety. What assurances that it would not happen in the WDM!!

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<thead>
<tr>
<th><strong>Department of Environmental Affairs</strong></th>
<th><strong>Comments</strong></th>
<th><strong>Responses</strong></th>
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<tbody>
<tr>
<td>Sibusisiwe Hlela</td>
<td>1. We should make a good analysis status quo, social, economic, and environment issues and then from there we need to provide direction in terms of how do one ensure responsible development. We need to assist the municipality in pointing out mechanisms that can be used in order to achieve responsible development.</td>
<td>Noted.</td>
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<td></td>
<td>2. I think there is a need for government co-ordination to discuss the needs for this area. So I really support the idea of a workshop as we spoke in the meeting. But if there are a lot of challenges there may be lots of disagreement. An EMF should then stick to the basics, that is to identify opportunities and constraints, environmental sensitivity / concerns of the area.</td>
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<td>3. I would be very happy if we could have industries and all other developments but be responsible in the manner in which we develop.</td>
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<td></td>
<td>4. We need to talk environmental offsets in a way that will lead to sustainable development. We need to be strategic in the manner in which we manage, conserve natural resources. We need to find way of mining in a responsible manner. If there can be or is a way of mining responsible many people would not have such a negative attitude towards mining and this will assist in achieving sustainable development</td>
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<td></td>
<td>5. Social and economic issues- People need jobs. If people are not employed it is difficult to talk environmental management, conservation, etc. because they want to make use of those resources and make use</td>
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of them possible to their depletion because they do not have other means. People need to be educated. Once people are educated they will see things from a different light. People need jobs.

6. Opportunities, the existence of mineral resources, ecological resources, all the natural beautiful resources which can be put to good use. The challenge is that issues are interlinked. For example, if one needs to develop the area for tourism, mining, etc..., the infrastructure must also be upgraded. This needs full co-ordination and proper planning at government level.

7. Conflict for potential opportunities in the area can be found where mineral resources are occurring in the same place with ecological resources.

<table>
<thead>
<tr>
<th>Surprise Zwane</th>
<th>Noted.</th>
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<tbody>
<tr>
<td>1. We should be in the position to provide clear guidance and evaluate land uses (current and proposed) in the study area as being sustainable and / or unsustainable. We also should be able to fulfil some of government’s vision and programmes in the area. All in all be able to manage the available resource base, detect change over time and provide parameters for which that change can be clearly detected.</td>
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<tr>
<td>2. Providing this platform for input by all organs of state as well as the public. We must be able to provide reasonable, implementable and measurable for the environment and respond to the demand for resources. Align our process to other processes applicable in the area.</td>
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<tr>
<td>3. My needs are to be able to provide clear guidance on what can work and what can't for the environment in the Waterberg. My specific expectation is being able to respond to the uncertainty and be able to understand the challenges from an environmental point of view.</td>
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</table>
| 4. In order to achieve sustainable development in area, the following factors should be considered:  
  - Available resources such as water, land and minerals. Infrastructure and maintenance thereof; and  
  - growth and development perceptions from all sectors having vested interests in the Waterberg. |        |
| 5. Improvement of lives of locals and provide a base for long term income to sustain the livelihoods in the area. Link to other development nodes such as Polokwane, etc. Create other ways to attract income and investment in the area. |        |
| 6. Minerals, abundant natural features and sparsely |        |
populated are things to consider as an opportunity. The big constraint is infrastructure and ideology in the area on how growth should be or can be geared.
7. Conflict for potential opportunities in the area can be found amongst:
   • People and the environment;
   • water and minerals;
   • empathy and ideology; and
   • air and mining.

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<tr>
<th>Game farming Focus Group</th>
<th>Comments</th>
<th>Responses</th>
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<tr>
<td>Fanie Greyling</td>
<td>1. I really appreciate the fact that the total picture is being taken into account. We should however have some kind of follow up, ensuring that this project is not only paperwork. I also believe that there are more factors at play than mere scientific measurements. With developments in the area, specifically the Steenbokpan area with companies like SASOL, Res Gen, Anglo Secoco Coal and Eskom hanging about, our whole livelihood lies in the balance. We are mostly game farmers with some cattle and off course hunting outfits. We will be unable to continue with hunting in the area because of a few factors. Tourists and hunters will not travel thousands of km’s to hunt next to power stations, open groove coal mines and along roads frequented by huge trucks carrying coal. The noise, dust and visual pollution will end game, conservation, hunting, etc. We have spent hundreds of thousands of Rands building up our businesses. It is not possible to just switch to another crop or type of farm. It was mentioned to me that in the Witbank area a lot of beef and milk are produced. It might be possible to switch to cattle farming. But it must be taken into account that markets are far away, increasing transport costs. The yield from cattle farming in comparison to hunting and tourism is lower. We are also robbed of our choice. We live here, built our businesses here, planned our lives and the future of our children’s lives around this piece of earth, because we wanted to. We live here because of the untouched, unspoiled, scarcely populated wilderness that still remains within range of civilization. For us, there is no better spot of Africa anywhere!!! After 40 years of power stations, mining, etc. the bushveld will be lost forever and development will have taken what they could. The question is if the price is not too high? We understand that we cannot stand in the way of development. But there must be a way to limit the</td>
<td>Noted.</td>
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impact, the destruction, so that we, our children and grandchildren can live the lives we have chosen, we have dreamt about.

2. We need to ensure that development take place on a responsible level. It seems that when money talks, everything else gets drowned out.

3. Some of the critical environmental factors to consider in order to achieve sustainable development in the area are noise, air and dust pollution which are critical issues, as well as visual impact on tourism and hunting.

4. We are very concerned about the uncontrolled influx of people hoping to get jobs. Steenbokpan has no mentionable infrastructure and a serious water scarcity. An informal settlement already causes problems with crime, considered a hot spot by the local SAP. These hopefuls are not the responsibility of the big companies as they are not on their payroll and will therefore not be looked after. The burden will fall on Steenbokpan-inhabitants. Social problems just escalate from here.

Wildlife Ranching SA
R Holtzhausen

1. The main objective of the EMF should be to:
Shape political and public opinion that wildlife ranching is a legitimate, transformative and sustainable agricultural practice that is:
- Economically viable;
- politically sensitive;
- socially just; and
- ecologically appropriate.

2. For the wildlife industry to reach the goals mentioned above, the industry should reposition itself to ensure that the following issues are promoted and actively driven:
- South Africa’s wildlife ranching industry represents the progressive new face of agriculture in South Africa;
- wildlife ranching is making a major contribution to job creation, food security and economic development in rural communities;
- the wildlife ranching industry can help ensure the success of the vast tracts of agricultural land that has been redistributed to historically disadvantaged South Africans;
- lobby to locate wildlife ranching “four square” under the auspices of the Department of Agriculture, Forestry and Fisheries (with the regulatory framework adjusted to accommodate this) and work in close collaboration with the Departments of Environment and Rural Development and Land Affairs; and
- mobilise external resources to improve sales of game meat, including the creation of a unique brand name for South African game meat.

To achieve these goals the wildlife industry is dependent
ENVIRONMENTAL MANAGEMENT FRAMEWORK FOR THE WATERBERG DISTRICT
PUBLIC PARTICIPATION REPORT

on many factors – one being able to receive support from municipal authorities. This EMF should be the vehicle for the wildlife industry to gain access to the Waterberg District Council, and the objectives of the framework should be in line with the goals of the wildlife industry.

3. The Waterberg region plays a critical and crucial role in the bigger picture of the South African wildlife industry. Limpopo is the biggest provincial role player in this regard and represents almost 50% of all exempted or adequately game fenced properties in South Africa. Of the approximately 50% of game farms in South Africa, an estimated 25% is situated in the Waterberg region of Limpopo.

In South Africa the wildlife industry utilises 20, 5 million hectares of agricultural land that is generally not suited to intensive food or livestock production. The role of the wildlife industry (with specific reference to the Waterberg), has not been emphasised sufficiently, and the EMF should become the mouthpiece of the wildlife industry to promote:

- The fact that the wildlife industry could become one of the most important agricultural “food sources” providing affordable protein as well as food security for rural and urban populations; and
- the fact that the wildlife industry supports a wide range of rural economic activities such as eco-tourism (game viewing, lodges, hiking/adventure trails etc.), hunting (utilisation, recreational, trophy and taxidermy) and nature conservation (species preservation, live animal sales, and integrated land-use management).

Directly linked to the wildlife industry and game farming are the issue of permits and service delivery. Permit fees generate a substantial income for the Limpopo Department of Environmental Affairs. It should be brought to the attention of the relevant departments that revenue earned requires associated service levels. Better service will secure positive income for the issuing of permits.

The main message conveyed to political leaders and general members of the public should be that wildlife ranching is the African solution to African land use and food security challenges. The EMF should also recognize this.

4. Certainly the most critical factors with regards to any development is that it should be
- ecologically appropriate;
- ecologically sustainable; and
- economically just.

These three concepts are interdependent on each other.
Unfortunately ecological principles cannot always override economic factors – similarly economic principles cannot dominate ecological principles. Sustainability will only be attained once economic and ecological principles are in equilibrium.

5. Sustainable development is dependent on the following four factors to ensure sustainability, and should therefore be:
   - Economically viable;
   - politically sensitive;
   - socially just; and
   - ecologically appropriate.

None of the above factors should override the other as this will lead to an imbalance, jeopardizing the sustainability of the development.

The essence of Wildlife ranching is sustainability. Amongst others, social and economic factors include:
   - Game ranchers employ more than 100 000 workers and their extended families;
   - the remuneration offered is on average at least three times greater than the amount paid by conventional agriculture;
   - the bulk of the employees are sourced from local rural populations, but city dwellers are also attracted and therefore contribute to the re-population of rural areas;
   - wildlife ranching could play a supportive role to emerging farmers who have been allocated marginal land as part of the land restitution process;
   - in addition, the economic revitalisation of communal/tribal trust lands can also be explored. Over-grazed communal land would be suitable for wildlife ranching, wildlife conservation and eco-tourism, thereby offering food security and a source of sustainable income for impoverished communities; and
   - wildlife ranching can also contribute towards and participate in education as well as the upliftment of support service workers (e.g. hunting guides and hospitality workers (Agri-BEE oriented)). The social responsibility of any development should include these factors to ensure the social sustainability of such development.

6. The wildlife industry is keen to collaborate with Government and other partners to ensure that the abovementioned four factors are recognised as goals that must be achieved to ensure the sustainable development of the Waterberg region. The Waterberg is very well positioned to become an important role player in the wildlife industry in South Africa. Access routes, malaria free status, landscape, vegetation and wildlife are all factors that make the Waterberg unique. The fact that the landscape is mostly unspoilt and pollution free (no industries polluting the
area by means of air, water, and/or soil pollution) contributes to the value of this area and should be maintained at all costs.

Any development that will impact negatively on the status of the Waterberg must be seen as a threat.

Other opportunities (as mentioned in previous comments) include:

a) The support of emerging farmers who have been allocated marginal land as part of the land restitution process.
b) Exploring the economic revitalisation of communal/tribal trust lands through wildlife ranching, wildlife conservation and eco-tourism, thereby offering food security and a sustainable source of income for impoverished communities.
c) Contributing towards and participating in the education and upliftment of support service workers (e.g. hunting guides and hospitality workers (Agri-BEE oriented)).
d) To this end WRSA would like to offer technical assistance to land claim farmers on marginal land that are already farming game or would like to do so.
e) Game farming is part of the “wildlife economy” and can play an important role in ensuring the success of the land reform and rural development process.

7. Land use opportunities are certainly one of the biggest areas of conflict. Any industrial development that does not comply with the four principles of development (to be economically viable, politically sensitive, socially just and ecologically appropriate) will lead to the esthetical degradation and reduction of the area’s potential – limiting any other type of land use opportunities.

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<tr>
<th>Mining and Industry Focus Group</th>
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<tbody>
<tr>
<td>Sasol</td>
<td>Dr. Carin Tredoux</td>
<td>Where do you think we should go to from here? What do we want to achieve? (destination)</td>
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<td>1. We interpret this question from two perspectives, namely: where we would like to see the EMF process going; and what our views of a desired-state for the area or parts thereof are. These perspectives are answered below:</td>
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<td>a. Where we would like the EMF process going:</td>
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<td>We would like to see that the EMF process is:</td>
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<td>– aligned and integrated with provincial, national and regional (cross-border) planning objectives;</td>
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<td>– that all potential stakeholders are actively participating;</td>
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<td>– that all issues are considered and that the desired</td>
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state is based on careful consideration of the issues at hand and not pre-determined ideas;

b. What is the desired state for the area or parts thereof:
The desired state for the Lephalale Municipal area is one in which:

– There is responsible planning which includes the consideration of the needs of the community and the country and allows both the development of the Waterberg Coalfield and continuation of cattle and game farming and conservation to take place.

– The Lephalale Coal reserve is mined in an environmentally responsible manner in accordance with a comprehensive mining plan which aims for optimally utilizing the whole resource.

– Industrial activity is situated in close proximity to the mining activity in order to limit the environmental impact, keep coal conveying costs down and provide for opportunities to return ash from industrial activity back into the mines.

– There is maximum local value-addition to the coal including the production of liquid fuels, chemicals, high value reductants for the metallurgical industry, power generation and the use of waste products from such businesses to produce other products such as cement, bricks and alternative building materials.

– There is extensive training of the local community such that the local community benefits most by the developments in the area, the influx of people from other areas is minimized and the negative social aspects associated with large developments is minimized.

– Residential settlement areas are to be established based on the following guidelines:

  – Never to be located on coal as this will sterilise a national resource;

  – To be concentrated in order to limit the overall environmental impact in terms of land use,

  – To be suitably situated such that there is sufficient space to allow for the growth that may occur as projects are executed and the need for housing increases;

  – To be suitably situated in order to limit the impact of open cast coal mining activities and industrial activities on the town inhabitants and similarly the position of settlements do not limit the full potential for mining and industrial activity by being placed inappropriately;

  – To be suitably situated such that workers at all possible positions of the coalfield do not travel excessive distances to and from work;

  – Common infrastructure corridors (road, rail, power, pipelines, conveyors, etc..) in order to limit the environmental impact, but also allow the rapid execution of projects in terms of the negotiation of servitudes and access rights;

  – Road development plans that enable efficient and safe movement of people, product distribution and equipment transportation. Bigger Waterberg district
– Responsible planning for the area which includes conservation planning; infrastructure planning and industrial development planning to take place.

2. Stage 1: Achieve cooperation between all stakeholders to allow sufficiently broad planning to be done for the area.

Stage 2: Planning: Develop an integrated regional development plan derived from:
- Comprehensive Spatial Development Frameworks (SDF) for the municipalities in the Waterberg District;
- Comprehensive mining development plans for the areas where mining development is envisaged;
- Comprehensive town development plans in accordance with the SDFs and taking into consideration the possible future developments in the area;
- Skills development plans for artisans and engineers to execute and operate the proposed projects in the area; and
- Infrastructure development plans in accordance with the SDF’s and EMF.

Stage 3: Implementation & oversight. The respective developers including private developers and government should then implement the plans within the required frameworks as and when such projects are deemed financially viable and/or required. Oversight is to be done by the relevant government bodies.

3. Needs include but are not limited to:
- Sufficient land for:
  - The establishment of a mine, beneficiation plant and coal stockpiles and topsoil storage areas;
  - the construction of a petrochemical complex and room for expansion thereof to include a possible second facility and downstream businesses;
  - buffer zones between the industrial complex and neighbours to ensure that the necessary safety regulations are met;
  - ash dumps, topsoil storage areas and coal stockpiles;
  - water storage and buffer dams;
  - office parks and maintenance workshops; and
  - tankfarms and logistics staging areas.
- Land access for:
  - Water pipeline servitudes;
  - petrochemical pipeline servitudes;
  - road servitudes;
  - electricity supply pylon servitudes;
  - conveyor belt servitudes; and
  - telecommunication servitudes.
- **Services:**
  - Raw water supply – anticipated to be supplied through the Mokolo Crocodile Water Augmentation Project (‘MCWAP’);
  - electricity supply; and
  - telecommunication services
- **Rail & road infrastructure to enable the safe and efficient transportation of:**
  - Coal to other markets outside the district;
  - petrochemical products to depots and retail outlets;
  - raw materials to the area including limestone;
  - large equipment to the site (especially during construction);
  - equipment for maintenance and operations; and
  - workers to and from work
- **A town which:**
  - Includes residential, business, recreational, health, civic and bulk services (Bulk services include water purification, water reticulation, sewerage treatment, sewerage reticulation).
- **Skilled Labour to:**
  - Build and operate the industrial and mining facilities;
  - build the town; and
  - operate and manage the town.

Provide security, policing, medical, emergency and educational services
- **Expectations:**
  - Better cooperation between stakeholders;
  - better communication on the development potential for the area; and
  - that the EMF and other development plans for the area aligns and integrates with provincial and national and regional (cross-border) planning objectives.

4. As a responsible corporate citizen we would be concerned about ambient air quality, water quality, visual aspects and the environment in general. In addition, compliance with legislative requirements and specifically with the duty of care principle with regards to the environment and natural resources.

5. Compliance with legislative requirements, in particular the following actions related to sustainable development are highlighted:
   - Ensure that there is a robust business case i.e. a need for the products, a robust technology, skilled operating personnel, ability to meet environmental restrictions and logistics channels to get products to market and feedstocks to the plant.
- Ensure that there is a clear plan to limit the negative and enhance the positive socio-economic impacts. This includes the support of on-going training, skills development, encouraging job creation for locals, local sourcing of services, local enterprise development.
- Continual improvement of the business through efficiency improvements and producing higher value added products. This is done through continued research and development, engineering focused on optimisation and seeking opportunities for downstream business development.
- Encouraging broad based black economic empowerment (BBBEE).
- Complying with and following local development plans e.g. SDF.
- Encouraging commitments to rehabilitation after closure of developments.

6. Key opportunities of the Waterberg District are:
- The large coal resource in the Lephalale Municipality;
- local communities requiring employment;
- undeveloped farm land in the Waterberg Coalfield area, thus allowing structured future development of the Lephalale Municipality;
- the increased return flows of water into the Waterberg District via the Crocodile West River system from growth in Gauteng;
- the bio-sphere area for the development of eco-tourism; and
- high solar radiation levels.

Key constraints of the Waterberg District are:
- Lack of communication between stakeholders;
- Road and rail infrastructure linking the Waterberg coalfield in the Lephalale Municipality to other municipalities in the Waterberg District and beyond;
- the quantity of water available in the Lephalale Municipality for industrial and mining development;
- the present capacity and skills of the local community to participate in establishing, managing and operating the industrial and mining development opportunities of the Waterberg District; and
- the position, quantity, geological structure and properties of the mineral resources in the Waterberg District.

None of the opportunities identified above are in conflict with each other.

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<th>Private</th>
<th>Comments</th>
<th>Responses</th>
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<tbody>
<tr>
<td>Living Golf SA</td>
<td>1. Vaalwater plus 50km radius and Biosphere as designated area for “green” environmentally friendly</td>
<td>Noted.</td>
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</tbody>
</table>
Franz Rolink | area with environmentally sustainable development = dedicated for green ecotourism, light industrial only around Vaalwater.  
Protection of water, air and soil to ensure human life is sustainable.  
Long term water supply and water management programme.  
Declare Vaalwater including Leseding Township as SA showcase for core principles of UN Man & Biosphere Programme with core principles of environmentally sustainable development and poverty alleviation/improved livelihood – an African Transition Town/Ecovillage  

2. All development must be subject to the availability of water.  
Adoption of: Clean Water First For Humans.  
- Adoption of maximum acceptable air pollution parameters for Waterberg Biosphere.  

Government committed to:  
- Clean air, clean water and clean soil for Vaalwater and Biosphere;  
- cap on coal mining and coal fired power stations; and  
- abolishing coal to gas liquefaction; and  
- no coal transport and electricity lines through Waterberg Biosphere and Vaalwater.  

3. Our main needs include:  
- Improved communication between government authorities and local stakeholders;  
- support in the implementation of environmental awareness training, skills training, basic entrepreneurial skills development, water-wastewater; and  
- waste management, appropriate infrastructure.  

4. In order to achieve sustainable development, the following factors should be considered:  
- Limit/eliminate water pollution from sewer, unorganic fertilizers;  
- collect & manage rainwater and stormwater;  
- limit air pollution from increasing heavy duty traffic through Vaalwater and from increased mining activity in Lephalale; and  
- strong political support towards renewable energy, especially solar.  

5. Significant investment into awareness raising and training in schools and community for critical environmental elements towards sustainable development. Skills Training.
6. Vaalwater and Leseding Township, as the only peri-urban township in the Waterberg Biosphere, are uniquely positioned to become an important South African model for the safari & responsible ecotourism, to become a showcase and training centre for sustainable development in Africa, a leading African Transition Town to cope with challenges such as climate change, water shortage, economic instability, rising transport & food prices.

Key constraint is water. Water is already a scarce resource in Waterberg. Science predicts Limpopo to suffer under extreme water shortage by 2050 if current climate change conditions continue unmitigated. Water consumption caused by mining and power station activities aggravate the problem. Communities’ especially marginalised townships are often unaware about this dilemma. Required is a campaign to create awareness, education, communication amongst the diverse community groups to motivate mitigating action.

7. The DWA Water for Growth and Development Framework states:

"A balance is needed between bulk and small-scale infrastructure projects.... The Department will particularly seek for and support interventions in the water sector that explicitly provide for the dual goals of growth and development, since one goal should not be realised at the expense of the other".

This can be the entry point for the discussions around water in the Waterberg within the EMF. People living in the region need to receive the same level of attention as bulk water supply.

---

**Jeff White**

1. The discussion regarding the proposed expansion of the Lephalala coal resource and the upgrading and/or building of new power stations in the area is good news for the growth of the region. However good planning is essential to reduce the influence of this industrial programme on the current environment. The idea of a single corridor wherein all road, power lines and rail links could be concentrated is a great idea, however the land area of the corridor should be carefully considered in order to allow for “expansion”. Frequently growth tends to expand beyond the limits initially set for the project, and in this case it could be a problem if new towns develop and follow the lines of transport (as in the normal case).

In designing these “corridors care must be exerted to ensure that no new (or at least not yet developed) mineral deposits are “lost” and effectively sterilized by the transport corridor. Similarly the route should be carefully checked that no geologically unstable conditions exist that could be problematic for the longer term security of the project. Also the design should take...
cognizance of the loss of other potential beneficial features, such as water well field, due to the precise route of the corridor. In such cases where major long term projects are planned, the drilling of additional ("confirmation") boreholes to ensure that decisions are based on the best available information with regard to any of the above potential interruptions to the location of the corridor.

2. Natural Resources within the region include water. It has been highlighted that the available water supply is inadequate for the social development programmes and agriculture and mining within the region. And yet the rainfall in some areas is fairly good and the drainage pattern is also good. There is however only two major dams within the area, and there are currently several large and costly plans to import water from surrounding regions to supplement the present water supply. The group should consider the possibility of additional dam construction to store and create additional water reserves within the Waterberg region. One possibility lies in the upper reaches of the Lephalalala River capture area, where in the high mountain and hills terrain a suitable location maybe found. The area records annual rainfall of 600+ mm rainfall and the geological sequence is the Waterberg group sediments, which contain normally poor mineral potential, so the sterilization of other areas of economic potential are reduced. The negative aspect lies in that these areas are identified as being of high ecological value. Given the needs of agriculture and of mining and building a sustainable economic programme the potential of additional dam construction should at least be considered. Dependant upon the geotechnical aspects of any chosen project, this could also be considered as a potential hydro electrical generation project, which could also create additional employment opportunities and ease the power supply situation.

3. In all the above suggestions it is envisaged that considerable interaction with other governmental bodies such as the Council for Geosciences would be engaged to check and verify the extent of past exploration activities to reduce the possible sterilization of any mineral resource. It is suggested that a data base of the known water boreholes be constructed to enable a better estimate of the total underground water reserve. This may be useful in the future to decide on the best geological formation in which to locate additional water boreholes and this with other geotechnical parameters may greatly assist with any future drilling programme.

The database on current well fields should include various details such that the chemical quality of the water and the depth to the water table, which should be monitored over a period of time, to check on the effectiveness of environment management systems. Management systems could then be modified dependent upon results of the monitoring scheme.
Anne Scotting  | I can only speak from a Vaalwater and Environs perspective.  

1. Assuming that any government department is going to take cognizance of the results of the survey, there are a number of issues to be addressed:

The Waterberg Biosphere reserve and surrounding areas should be strictly governed regarding any high density townships and development. It should become a protected area, and registered as such therefore protecting one of the last extensive wilderness areas in the country, particularly due to its uniqueness and perhaps more importantly a malaria free area for tourists.

Given the scarcity of water in the area it is not amenable to extensive growth in the farming sector requiring vast amounts of water for crops.

The area, with the town of Vaalwater as its centre, has a unique capacity to become a hive of activity in tourism, and indeed an attraction to local towns as a weekend/day visit retreat. At the same time growing the tourism industry here for more long term visitors.

Currently there is little, if any, input into Vaalwater and the development of the surrounding area other than where individuals have tried, and in some cases succeeded to raise funds elsewhere in an effort to upgrade what there is to offer.

It is also important to recognise that there are a great many number of people here without employment, or any future possibility of employment. An ever increasing figure of South Africans and illegal foreign nationals, that is an enormous, ever growing strain on the already vastly insufficient infrastructure and services, therefore increasing pollution in all areas, waste, sewerage, noise, etc..

Mining in any area should not be underestimated as a source of employment, growth, wealth generation across all sectors, educational opportunities, etc.

2. It is important that whatever the results of this survey, they are put into the hands of appointed personnel that are able to **plan, take responsibility for, and act upon** the findings. There have been too many promises made in the past with nothing materialising. The upliftment of the Limpopo region should not become a political arena for point scoring or self-enrichment. I am sure that you will find many members of the public that would be happy to assist in a number of capacities. We do not need yet another disappointment.

**Urgent** attention has to be paid to the infrastructure and service delivery.

Noted.
Water – The department of Water Affairs has consistently ignored the needs of the town. This situation cannot continue. There were people here who regularly serviced pumps etc., but they discontinued the effort due to lack of payment from the department.

Sewerage – the current plant is virtually out of commission due to overloading. Raw sewerage runs aground and ultimately dissipates into the water table.

Roads – the road between Modimolle and Lephalale needs to be extensively upgraded. The first 13 km were completed, but there is a lot more to go. It is a very dangerous road and is a deterrent for visitors to the area. An alternative route needs to be established for the large trucks that service the development in Lephalale.

Waste Management – implement a recycling programme for the whole town and surrounding game farms that use the municipal landfill site. Charge a levy for waste dumpling from Game Farms.

Noise Levels – put road humps on all roads through Vaalwater, decreasing speeds.

Public establishments within an urban area must abide by the by-laws regarding decent opening/closing hours.

Address the needs of Lesedeng both in service delivery and adequate housing needs.

Disallow informal settlements on public grounds. Control influx.

All of the above would require a task team to establish needs and requirements that would then have to be submitted to government for approval and funding. Again, I think that members of the public would gladly assist.

3. I would hope that this survey will result on some action, and not another questionnaire that is going to be put on a desk, in someone’s office, for someone to do, sometime!

I would expect that various aspects of the survey results be separated and a small task team appointed for each aspect. Different needs require different skills and appreciation of scope of work required. Each task team should have the skills to assess and provide a plan of action along with projected costs.

4. A public awareness campaign aimed at Pride in Where We Live for all sectors. Keep our town clean campaign.

Road infrastructure encouraging people to visit the area. Education and training, aimed at Enterprise
Development for the previous disadvantaged. Any company affiliated to the mining industry, and possibly others, gain considerably extra BEE points for funding ED’s. It could be a source of funding for some local development.

Skills development.

All without creating unrealistic expectation levels of employment.

A non-political approach. Rather an approach that is for the benefit of the area, maintaining its uniqueness for future national heritage.

It is imperative that the whole programme be handled by mature, level headed individuals that have the ability to look to the future.

5. Public awareness of the wealth of the Waterberg Environment, and the necessity of damage control, and environmental impact.

Contain and control development of townships in any sector.

Contain, and control development of informal settlements. Instituting relocation opportunities where applicable.

Accept that mining of any nature can, and does, as a general rule, bring prosperity to the area in which it operates, and provides numerous opportunities to the local communities, which need not be only employment related.

6. Opportunities:

Tourism. Approximately 70% of tourism in South Africa are South Africans themselves. The Waterberg is in easy reach of the largest market in Gauteng.

The town of Vaalwater could easily become the hub of the Waterberg, using arts, crafts, etc. to bring a little more prosperity to the town.

The area has the potential of becoming a malaria free alternative to the Kruger Park and it is closer to international access. However that would be a long-term possibility with people agreeing to take down fences between privately owned properties.

Constraints:

- Total disinterest of local government departments in Vaalwater;
- lack of service; water, electricity, waste control;
- roads in a state of disrepair;
- appearance of Vaalwater to the tourist going through on the main routes;
- ever increasing number of illegal foreign
nationals;
- lack of education and skills;
- understaffed, underfunded schools; and
- understaffed, under equipped Police Force.

7. Conflicts for potential opportunity can be found amongst the following:
- Conservation groups v Mining;
- local Tourism v Tourism aimed specifically at the overseas market; and
- enterprise Development v Unrealistic employment expectations.

8. With very little input the town of Vaalwater could be cleaned up to the visiting eye. The informal market could be moved to the field adjacent to the current shopping precinct, where the land has been allocated for such a market, an ablution block built, which would have to be managed, therefore negating fouling of the street and the rain drainage structure. A very simple solution having an immediate impact.

S.R. Van der Westhuizen

Stop further damage to our environment!!!!!

We are the owners/developers of an ecological friendly wild life estate. We would prefer the area to be kept as natural as possible. We have had great success through careful planning and execution over the past 22 years.

Upgrading of all roads!!

Prevention of over-exploitation and contamination of our surface and sub-surface water sources.

Prevention of air and noise pollution.

Prevention of additional heavy traffic.

Addressing crime.

Create (or at least try) to get a fine balance between our greatest asset (NATURE) and commerce, such as mining, etc.

Upgrading of Eskom and Telkom.

Approval of mining activities will have a huge effect on agricultural and eco-tourism.

Existing developments will take a huge financial knock, resulting in job losses, and an increase in crime.

Find a BALANCE.

Opportunities:
- Eco-tourism, agricultural, hunting and mining (although I hate to admit the latter!).

Constraints: Bad infrastructure, especially ROADS.
Limited water availability. Sewerage pollution (Municipalities).

The beginning of air and noise pollution (heavy traffic). CRIME!

Eco-tourism, agriculture and hunting against mining.

<table>
<thead>
<tr>
<th>Theunis Kruger</th>
<th>Wat bereike moet word:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. So gou doenlik jul opdrag te finaliseer en die verslag wyd beskikbaar te stel. Dit sal help met toekomstige beplanning.</td>
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<table>
<thead>
<tr>
<th>Wat is u spesifieke verwagtinge?</th>
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<tr>
<td>2. Om die resultaat van jui verslag in die praktyk te laat toepas deur verantwoordelike partye.</td>
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<table>
<thead>
<tr>
<th>Wat is die kritieke omgewingsfakte in die area?</th>
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<table>
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<tr>
<th>Wat is die kritieke sosiale faktore in die area?</th>
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<tr>
<th>Wat is die hoof geleenthede en beperkinge in die area?</th>
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<tbody>
<tr>
<td>5. Bevordering van die ekologie en infrastruktueur te vestig met eko-toerisme.</td>
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<thead>
<tr>
<th>Watter geleenthede is in konflik met mekaar?</th>
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<tbody>
<tr>
<td>6. Onpraktiese voorleggings en voorstelle wat nie haalbaar is nie, dit het 'n negatiewe effek op ons as die publiek. Dinge glip deur.</td>
</tr>
</tbody>
</table>

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<tr>
<th>E. Lademann</th>
<th>Omgewingsfakte</th>
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</table>

Die sentrale Waterbergstreek kry °n aansienlike hoër langtermyn reenvalgemiddeld as die omliggende streke. Die oorvolvoed stormwater vergader en mond uit in verskeie riviere en spuite, wat rondom die Waterberg gelee is en wat uiteindelik in die Limpopo rivier uitmond. Op pad soontoe is daar die Nylvloedvlakte, asook die sg. Kgomo-Kgomo vloedvlakte suidwes van Bela-Bela waar die Apies-, Pienaars- en Platrivier saamvloei in in die Krokdilrivier uitmond. Wanneer die Nylvloedvlakte oorstroom is, vind daar °n aansienlike stygging in die onderaardse watertafel van die noordelike Springbokvlakte plaas. |

Noted.
Sou prospekteer en mynrege toegestaan word in genoemde gebiede, kan die onmiddellike omgewing besoedel word, asook die riviere, wat uiteindelik in die Limpoporivier uitmond.

Dit sal 'n negatiewe invloed hê op die ekologie van die Bosveld, asook op volhoubare voedselsekerheid.

<table>
<thead>
<tr>
<th><strong>Tourism Focus Group</strong></th>
<th><strong>Comments</strong></th>
<th><strong>Responses</strong></th>
</tr>
</thead>
</table>
| Hanlin Lodge Retha Weir  | 1. I believe that the Waterberg is one of the best kept secrets in our country. This region should be the preferred tourism destination in the country. It has everything going for it.  

2. Firstly tourism should be recognised as a valued sector in this region, with a master plan or strategy and a distinct budget. Generations who tried to farm here has proven that neither cattle nor crop farming is really viable in this area. But game and tourism has been doing very well of late.  

My suggestion would be to take this area as a pilot project and develop it as a tourism destination as a whole. Take a 5 year plan. Start with a campaign about the town. Get every people in every school as well as every petrol attendant and shop keeper to be proud of this town and to understand that tourism coming to town is a valuable source of income. Make sure that every tourist coming through town is treated like a long lost brother. Make sure that residents know everything there is to know about the town and the region or at least where to refer someone to if they cannot help them.  

Upgrade all tourist attraction and potential tourist attractions. Develop lookout spots, including crafters and traditional entertainment as well as safe parking areas and pick nick spots, and infrastructure for rubbish removal. Provide toilet facilities.  

If we have the infrastructure places like Mpumalanga have at their tourist attractions, we can draw the same amount of tourist. We are closer to Gauteng, we are also en route to Kruger National Park, we also have waterfalls and beautiful mountains, we are malaria free, we have good weather all year round (better than Gauteng), we have hot springs. What we need to work on is the “what can I do” which all the tourist ask once they are in the area for a while. We have to work on the “oh-factor”, people come to an area here about a tourist attraction, drive there, see it, say “oh”, take a photo and go home. We have many “oh” spots in our region but they are undeveloped and thus never seen.  

3. All sectors and departments should recognise tourism as an economic driving force in the area. Road networks, signage and advertising should firstly be done and maintained. People should start seeing tourists as a

<p>| | |</p>
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<td></td>
<td>Noted.</td>
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</table>
viable resource and not a nuisance. Tourism development should be included in IDP and strategic planning of every department and structure.

4. In order to achieve sustainable development in the area the following factors should be considered, maintenance of historic buildings, artefacts and attraction, proper labelling and descriptions of these sites.

5. Maintenance of roads and storm water systems.

6. Recognition and preservation of natural areas, the appointment of knowledgeable managers and staff at reserves. Money of infrastructure maintenance and development.

7. Education and information provision to show the local people the resources we have in the area, in order to add value to all resources and to provide people with a sense of pride.

8. Unemployment is a major issue in this area. People need to appreciate the value of historic, cultural and natural sites in the area. The only way to do this is the let people understand that they could get a benefit from it. By giving a site a value it will be worth protecting.

9. Tourism holds that larges opportunities in our area, and is totally under developed. Funds and the administration there off is that largest constraints.

10. conflicts for potential opportunities in the area can be found amongst the following:
   - mining and tourism; and
   - mining and farming.

<table>
<thead>
<tr>
<th>EcoZa</th>
<th>Johan van Rooy</th>
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<tbody>
<tr>
<td>1. Expand and consolidate the Waterberg Biosphere Reserve so as to create a viable and preferred eco-tourism and wilderness destination with the proposed meander routes as its spine or access routes. Govern/manage it according to an Environmental Management Plan with appropriate zoning to make provision for core, buffer and transition zone related activities. Refer to A de Klerk’s 2003 thesis on Eco Tourism in the Waterberg Biosphere and especially the relationship between the criteria for establishing a UNESCO biosphere reserve, planning guidelines for eco destinations as well eco-destination characteristics as compiled by UNEP. Also look at Dinokeng where private land owners and local government co-operated to establish a very attractive eco-tourism model.</td>
<td></td>
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</tbody>
</table>
3. Educate the land owners about the pros of having an EMP in place as well as the long term benefits of looking after their farms and managing it in an environmentally responsible manner.

4. A protected Waterberg Biosphere Reserve with a vibrant, yet distinctly wilderness appeal. Only by establishing clear boundaries with clear zonation parameters will it be possible to conserve this beautiful wilderness area and to balance-out excessive industrial, mining and commercial farming activities in the immediate surroundings.

5. In order to achieve sustainable development in the area the following factors should be considered, sustainable unpolluted water, unpolluted air and preservation of natural (endemic) vegetation through the removal of alien tree species and by managing and limiting the impact of commercial farming, industry, mining and incompatible rural residential developments.

6. This area is notorious for its excessively bad gravel roads and improvements to the road network infrastructure are long overdue. The roads between Thabazimbi and Mookgophong (via Alma & Die Oog) as well as between Thabazimbi and Rooiberg should be tarred to improve accessibility, while gravel roads should be upgraded and better maintained.

7. Communications infra-structure should be improved. Informal housing clusters spread along the entire region should receive attention. There is a need for more proper houses to be built in place of dilapidated shacks and service infra-structure in the informal settlements can be vastly improved.

Key opportunities:
- Eco tourism;
- Conservation; and
- job creation by the proposed industrial and mining developments on the fringe of the biosphere.

Key constraints:
- Sustainable water supply to cater for proposed industrial and mining developments;
- any industrial or mining developments within the biosphere including uncontrolled prospecting in the entire region; and
- dilapidated and badly managed infra-structure.

The terms conservation and development are often regarded as being in conflict. If zoned appropriately and thus kept separately while conservation areas are being properly managed (according to an EMP) and promoted as being a preferred wilderness area, the two sectors should not be in conflict and should rather be complimentary.
### COMMENTS RECEIVED FROM STAKEHOLDERS AND INTERESTED & AFFECTED PARTIES ON THE DRAFT STATUS QUO REPORT

<table>
<thead>
<tr>
<th>Stakeholder / I&amp;AP</th>
<th>Comments</th>
<th>Responses</th>
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</table>
| Sasol              | **1. Section 2.1.6 - Interpreted soils Data of the Waterberg District Municipality.**  
- There is a contradiction on the issue of the land capability in the area of Steenbokpan that needs to be clarified or changed. The contradiction is based on the following sentence in section 2.1.6 on page 44 that states “The agricultural potential of the area is intimately associated with topographical, pedological (soil) and climate determinants. As a general trend the potential for dryland cropping decreases with the rainfall distribution from south to north and east to west. Soil factors do play a role in that shallow, sandy and very high clay content soils also lead to a slight reduction in potential due to the decreased water storage/plant water supply capacity.” Whereas, the capability map as attached does not correspond with this paragraph, in that very sandy, shallow, low rainfall soils around Steenbokpan, where several irrigation farms are situated, are indicated as “moderate” or “moderate-low”.  
- Please add a reference for the statement on 44 “that rainfall decreases from west to east”.  

2. **Section 2.3 - hydrology**  
- A 2009 study by the Department of Water Affairs (DWA) has updated the yield of the Mokolo Dam to 29 million m³/a, which is more recent than the 1992 study quoted on page 89.  

3. **Section 2.4.3.5 - The middle Mokolo region**  
- A recent (2010) study has been conducted by DWA to determine the ecological reserve requirements of the section of the Mokolo River downstream of the Mokolo Dam. This study should be available for reference from DWA and it may be useful to quote these. It must also be borne in mind that the releases for irrigation downstream of the Mokolo Dam partly fulfil the ecological reserve requirements.  

4. **Section 2.5 - Biology**  
- Based on our baseline assessment studies for studies for Project Mafutha, it would appear that the “Western Sandy Bushveld” and the | Thank you for your comments and inputs.  
Noted. |
“Limpopo Sweet Bushveld” on the map titled “Vegetation Types” may have been incorrectly labelled. It may be worth checking this.

5. Section 4 – Air Pollution Potential

- The ambient Air Quality Target map as attached to the document shows different hot spot areas with specific targets with regards to air quality. We do not understand the reasoning for zoning an area as “clean air: Where no change from the current air quality should be allowed” since air quality is not contained to fixed silos but rather crosses geographic boundaries in space and time. This statement is therefore misleading and it is proposed that it be better explained or removed.

- The ambient Air Quality Target map as attached to the document is factually incorrect if it is to reflect the status quo of present emissions and if it is a desired state then it should appear in the desired state document instead. The map indicates target ambient air quality standards and it is not clear who set these targets or who ratified and approved them.

It may be difficult to obtain a status quo map of the ambient air quality information as the reference from the AQM Plan (Gondwana, 2009) states: “limited air monitoring information is available in the Waterberg District, Making it difficult to accurately quantify the current state of the air quality in the District” and “Given the availability of data, the air quality assessment focused mainly on Lephalale as an evaluation of the air quality situation in other areas of the District could not be undertaken”.

- With respect to the ambient air quality status and ambient air quality target maps that may be created, we encourage you to consider the impact of agricultural activities as these contribute to particulate emissions. This may be valid in areas of intense agricultural activity.

6. Section 5.2 – Mining and Mineral Development

- It is stated on page 198 that the Iron Ore in Thabazimbi is owned by Exxaro Resources Ltd while we understand that it is owned by Khumba Resources. It is recommended that you confirm the statement with reference.

7. Section 9 – Key issues

- Sasol would like to propose that some of the issues raised in our various written responses during the EMF process, should be considered for inclusion as key issues. Such issues pertain to having development plans in place and adhering to such plans. This includes
| Department of Environmental Affairs | 1. **Page 7**  
  - “Anything else specified by the Minister or MEC"  
  What is this bulletin referring to? |
<table>
<thead>
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<tbody>
<tr>
<td>Kanyiso Mtolo</td>
<td>Thank you for your comments and inputs.</td>
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<td></td>
<td>Noted.</td>
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</table>
|                                    | 2. **Page 12 – Section 1.2.3**  
  - A detailed analysis of the approach including the potential classes of stakeholders classified is necessary.  
  - Contingency plan should there be challenges in the initial plan needs a detailed analysis.  
  - Uncertainties to PPP like language barriers, literacy and geographical locations need special attention. |
|                                    | 3. **Page 15**  
  - Maps should contain clients logos  
  - The information source used seems to be very old and I believe it's validity and reliability are questionable in 2010  
  - Last sentence needs spelling correction  
  - Geological systems numbering to be re-checked |
|                                    | 4. **Page 33 – Section 2.1.3.1**  
  - Spelling check |
|                                    | 5. **Page 35 – Section 2.1.3.5**  
  - Spelling check |
|                                    | 6. **Page 45**  
  - What goods and services are provided by the identified wetlands?  
  - What classification methodology was used to categorise the wetlands?  
  - What buffer is used to delineate wetlands in South Africa? |
|                                    | 7. **Pages 49-61**  
  - What impacts do mean temperature graphs have in the area? |
|                                    | 8. **Pages 63-72**  
  - What impacts do precipitation graphs have in area? |
|                                    | 9. **Page 76**  
  - What are the effects of table 3 on the study area? |
|                                    | 10. **Page 85** |

- comprehensive spatial development frameworks (SDF), comprehensive mining development planning, town development plans in accordance with SDF’s and skills development plans in order to uplift locals.
<table>
<thead>
<tr>
<th>11. <strong>Page 87</strong></th>
<th>12. <strong>Pages 90-107</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>What are the contingency plans improvised for the gaps identified?</td>
<td>How recent is the information used to determine river health statuses?</td>
</tr>
<tr>
<td>13. <strong>Pages 108-139</strong></td>
<td>14. <strong>Page 141</strong></td>
</tr>
<tr>
<td>Are all the vegetation types listed in the report existing in the area?</td>
<td>Which National Forest Act herewith is referred? Relevant applicable sections in the Act need to be provided.</td>
</tr>
<tr>
<td>Has there never been variation to date in Red data species diary?</td>
<td>15. <strong>Page 147</strong></td>
</tr>
<tr>
<td>16. <strong>Section 3</strong></td>
<td>More detailed information on wetland and riparian zones is necessary in terms of classification, categorisation, services and goods, health status, etc..</td>
</tr>
<tr>
<td>Has the cultural and historical data been confirmed with the relevant sources such as the Department of Science, Arts and Culture, Indigenous communities, local historians, etc.?</td>
<td>17. <strong>Page 207 – Section 5.8.7</strong></td>
</tr>
<tr>
<td>18. <strong>Pages 210-211</strong></td>
<td>Spelling check</td>
</tr>
<tr>
<td>Graphs are difficult to read and understand</td>
<td>19. <strong>Page 252 – Land uses</strong></td>
</tr>
<tr>
<td>20. <strong>Page 260</strong></td>
<td>What is the source of the information used?</td>
</tr>
<tr>
<td>Client’s logo needed.</td>
<td>How accurate, valid and reliable is that particular source of information?</td>
</tr>
<tr>
<td>21. <strong>Page 275</strong></td>
<td>20. <strong>Page 260</strong></td>
</tr>
<tr>
<td>It is imperative that list of references appear in the text as well.</td>
<td>21. <strong>Page 275</strong></td>
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</table>
## COMMENTS RECEIVED FROM STATEHOLDERS AND INTERESTED & AFFECTED PARTIES ON THE DRAFT DESIRED STATE REPORT

<table>
<thead>
<tr>
<th>Stakeholder / I&amp;AP</th>
<th>Comments</th>
<th>Responses</th>
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</table>
| Moletadikgwa Wildlife Sanctuary Richard Wadley | 1. I’d like to congratulate you and the Environomics team on an excellent piece of work. I realise that there are many stakeholders involved, and that their/our interests are not always aligned. This makes it difficult - and dangerous! - to compile a report that takes all the relevant views into account yet also provides the client (Waterberg District Municipality) with some clear guidelines as to how to go forward. You have succeeded in large measure in achieving this.  

2. Now of course, the burning question - which I note that many of your other respondents have also asked: will local and national government actually do anything about implementing your recommendations? Implementation is much more difficult than talk, though it probably doesn't cost any more. It requires people with integrity, energy and a commitment to make a positive contribution to the country (rather than just their own pockets). And government at all levels has pitifully few such people.  

But at least your report shows the way forward. Thank you all for that! | Thank you for your comments and inputs. They will be taken into account.  

Noted. |
| Environmental Assurance Retha Weir | 1. Thanks for the information. I worked through the document quickly and might have missed some issues, but I felt that the following issues should also be in there somewhere (sorry if I just missed it).  

- Air quality is severely affected by two issues during the winter months, firstly veld fires and secondly by burning of wood during the nights in the township areas, it get so bad some nights that you cannot see anything on the roads passing these areas;  
- although legislation is in place for fire breaks etc., it is not very practical and definitely not implemented;  
- although large trucks moving through towns has been mentioned the noise created by air brakes is a huge problem in towns especially late at night;  
- from a tourism point of view I missed mention of "business tourism", Modimolle has more than 21 guest houses who survive on salesmen and other reps who travel through the area and stay over at these places I am sure the same goes for other towns. Farm holidays are also very popular but not well developed in the area and could be developed in the agricultural area – e.g. come and see how a real farm operates; | Thank you for your comments and inputs. They will be taken into account.  

Noted. |
and
- I have forwarded the document to the Chamber of Commerce (Waterberg Sakekamer) not sure if they are registered, but I thought they should be aware of the process as well.

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<th>Stakeholder / I&amp;AP</th>
<th>Comments</th>
<th>Responses</th>
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| Exxaro Grootegeluk Mine Filomaine Swanepoel | 1. I have gone through the various Zones and their descriptions and find them to be well defined. When looking at the Zoning on the Map, although Lephalale is not indicated, it does appear as if all the areas were Exxaro and Grootegeluk mine is currently focusing its mining activities present and future are within the Mining Focus Area zone.  
2. If possible can you supply a map that shows the Lephalale, Steenbokpan area and its zones in more detail?  
3. Please see the attached slide it shows the current GLK Mining Authorization area plotted on your Shape file that was sent through with the relevant EMF zones. Please check it looks as if Turfvlakte 463 LQ was mistakenly put under Zone 5 (Potential large Industrial activities) within the EMF instead of Zone 4 (Mining focus areas). Currently no mining is taking place on this area but there are coal reserves that have been identified on this farm for future mining purposes. Grootegeluk will like to request that Turfvlakte 463 LQ also be included in the Mining Focus area (Zone 4). | Relevant zones were revised. Map was supplied. |

Allan van Coller | 1. This revised EMF does have direct implications for a project that we are busy with at the moment as it now makes specific reference to solar plants. We are in the process of planning a solar plant facility that falls within the area, but has been positioned on old degraded piece of land that will have almost no environmental impact as well as very low visual impact. We are in the advanced phase of the EIA at the moment. I am also a land owner in the area. I would like to comment on the document at least in my personal capacity as a landowner if not as a possible developer. What is the cut-off date for comments?  
2. I wonder if you could help with some information as it is difficult to tell from the map whether our particular site falls under Zone 1,2, or 9. If I give you the GPS coordinates would you be able to tell me which one we | Request was discussed telephonically and a map was supplied indicating the relevant zone for the solar plant facility. |
fall under. The piece we are looking at is currently zoned for agriculture and has two big pivot lands on it. The GPS coords are S24 11’.892” and E 28 19.297.

1. Nemai Consulting was appointed by the Department of Water Affairs (DWA) as the independent Environmental Assessment Practitioner (EAP) to undertake the environmental assessment for the Mokolo Crocodile (West) Water Augmentation Project (MCWAP).

Due to the limited availability of water in the Lephalale area, the DWA commissioned a feasibility study of MCWAP to establish how the future water demands could be met. The phases for the proposed infrastructure for transferring water from the Mokolo Dam and Crocodile River (West) are tabulated below.

**Phase 1:**
- An underground pipeline parallel to the existing pipeline, to augment the supply from Mokolo Dam. This is to supply in the growing water requirement and also to supply more water for the interim period until a transfer pipeline from the Crocodile River (West) can be implemented. The system will utilise the available yield from Mokolo Dam. Phase 1 consists of the following:
  - Gravity line from Wolvenfontein to Matimba Power Station;
  - Gravity line from Matimba Power Station to Steenbokpan; and
  - Break pressure tank at Rietspruitnek

**Phase 2:**
- Transfer scheme from the Crocodile River (West) at Vlieëpoort near Thabazimbi to the Lephalale area via a system consisting of:
  - A weir and abstraction infrastructure, including a balancing dam, desilting woks, and a high lift pumpstation at Vlieëpoort (near Thabazimbi);
  - Transfer system (approximately 100 km of underground pipeline): consisting of various alternative pipeline routes;
  - A Break Pressure Reservoir;
  - An Operational Reservoir; and a
  - Delivery system, consisting of alternative routes for a gravity pipeline (underground) running from the Operational Reservoir to the Steenbokpan area, connecting to the Phase 1 works.

2. The attached map shows the EMZs overlaid with the MCWAP linear infrastructure. Although the Phase 1 Main Route traverses the sensitive Zone 1, it runs parallel to the existing Exxaro pipeline. Likewise, the other routes attempt to follows existing linear disturbances and farm boundaries. Based on our spatial Your comments and inputs have been noted and will be taken into account.
appraisal of the map, we do not necessarily see any areas of conflict between the MCWAP routes and the EMZs.

Please confirm whether our assumption is accurate. In addition, are there environmental management requirements that we need to take into consideration at this stage for the EIA (and particularly the EMP) emanating from the EMF for Phase 2? Note that the Phase 1 EIA Report is currently under review by DEA.

1. The Map is limited in terms of representing potential mining focus areas (Zone 4) by only taking into account the Waterberg Coalfield. It is noted that the Springbok Flats Coalfield falls within the Waterberg EMF area (to the south of Bela-Bela) as well as the Soutpansberg Coal field which is further to the right of the Waterberg EMF (stretching from Blouberg to Masisi). These should be taken into account in terms of Zone 4 and potential mining focus areas.

2. Zone 5: and in particular the two areas just left of Lephalale (which appear to represent the Matimba and Medupi coal fired power station areas, are regarded as limited in terms of a longer term framework for potential industrial development in the area.

3. Zone 4: Mining focus areas – it is recommended that “roads and railway infrastructure that necessary for the safe and proper transportation of mineral products” be moved to preferred activities as these are required as an integral part of mining development.

4. Zone 4: Mining focus areas – It is further recommended that “Keeping of game and/or cattle for commercial purposes in a responsible manner that makes sustainable use of the natural vegetation cover of the area in parts where mining is not possible or where mining will only become a factor in the medium to long term; and Tourism facilities on disturbed land, including hunting lodges (indigenous vegetation should not be removed) in parts where mining is not possible or where mining will only become a factor in the medium to long term” be moved from “preferred activities” to “compatible activities”.

5. Zone 5: Potential large industrial and related activities focus areas – it is recommended that “Roads, railways and other infrastructure that is necessary for the safe and proper transportation of industrial products” be moved to preferred activities as these are required as part of supporting large industrial and related activities. Under “Undesirable activities” it states that “Any activity that does not meet national standards in terms of pollution of the air, water or land”. It is recommended that this not be included as it must always be taken that the “large industrial and related activities” must be compliant with national standards.

Responses to these comments were discussed telephonically and during a formal meeting with Eskom.
6. Zone 5: Potential large industrial and related activities focus areas – It is further recommended that the activities of: “Keeping of game and/or cattle for commercial purposes in a responsible manner that makes sustainable use of the natural vegetation cover of the area in parts where industry and related activities are not possible or where industry will only become a factor in the medium to long term; and Tourism facilities on disturbed land, including hunting lodges (indigenous vegetation should not be removed) in parts where industry and related activities are not possible or where industry will only become a factor in the medium to long term” be removed from “preferred activities” to be listed under “compatible activities” or even “undesirable activities” as in reality these activities are probably not desirable for industrial activities as they could potentially restrict the future expansion and development of large industrial activities.

Aurecon
Fanie Vogel

1. I assume the boundaries of the zones must be seen as “soft boundaries”.

I notice that Zone 11 on the map does not reflect the Phase 1 and the full phase 2 MCWAP pipeline routes. It also follows route R518 on the north side whilst our phase 1 pipeline route deviates slightly from that to the south.

Can you please make sure that we do not encounter future problems if we are not within the “demarcated zones” with the pipelines?

2. I want to bring an aspect to your attention regarding the areas that you indicated as Zone 10 – agricultural priority areas (intensive).

I notice that you indicate a significant area along the Crocodile River up to the confluence with the Limpopo River as zone 10. These are irrigation areas. You also show large areas on the south-west and south-east as zone 10 that are not irrigation areas.

3. Regarding the 2 main irrigation areas along the Crocodile River there is a significant difference between the irrigation upstream of Thabazimbi, (along the R511 on your map, between Ramokoka stad and Thabazimbi) and the area downstream of Thabazimbi up to the confluence with the Limpopo. The difference lies in the security of water supply. The area along the R511, to a point upstream of Thabazimbi, receives water from the Roodekopjies and Klipvoor Dams and will thus get the water at higher assurance than the irrigation between Thabazimbi and the Limpopo River. The irrigation in this latter area thus get water when it is available in the river.

I am not sure that it will make a difference to your map and zoning but what we do not want to have is that
<table>
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<tr>
<th>Name</th>
<th>Comments</th>
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<tbody>
<tr>
<td>Gondwana</td>
<td>1. We would like to recommend that in zones where residential areas exist (zones 7 &amp; 8) it should be specified that activities that do not meet national standards in terms of pollution of the air, water or land be listed as “undesirable” for those areas due to the associated health risks. Comments noted.</td>
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<tr>
<td>Loren Webster</td>
<td></td>
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</table>
| Contour Project Managers  | 1. We have gone through the draft Revised Environmental Management Zones circulated for comments from stakeholders that you sent to us. We have a reasonable working understanding of the study area as we are currently involved with the Master Plan for Moepel Farms as well as the Waterberg Biosphere Management Plan and have previously assisted Lapalala Wilderness with their Development Plan and the Province with a preliminary zonation exercise for the northern part of the Waterberg Biosphere.  
2. We really like the map and the logical approach that you have followed. We would however like to offer the following comments, based on some practical considerations.  
The description of the zones are problematic in the following ways:  
- Allowing the development of “limited tourism facilities on disturbed sites” in Zone 1 but then stating “no clearing of natural vegetation should be allowed”; is an impossible objective. We understand that the intent is to have the least impact on the ground and the vegetation, but every site is likely to have some form of natural vegetation, regardless of its level of disturbance. Even a surfaced road will have some natural vegetation on its verges, in cracks, etc. regardless of how small this vegetation may be. In the case of old lands, the entire field will be covered in natural vegetation, of which the majority will be indigenous. This restriction will therefore need some greater clarity or a different criterion should be sought to minimise impact. What could be used is the term “light footprint tourism facilities with minimised impact”, implying minimum disturbance to the soil and the vegetation, by utilising raised platforms and with minimised visual impact.  
- Also in zone 1, I suggest that the term “only on disturbed sites” should be replaced by a term such as (only on less sensitive sites, i.e. where no red data or valuable plant or animal species are known to occur and on sites that are not placed on any ecologically or culturally sensitive area or on sensitive soils or slopes).  
- Also in zone 1, a few private airstrips are                                                                 |
| Joheen and Willie Boonzaaier | The WEMF map of EMZs as revised after working in comments from stakeholders and the public was sent as requested. |
|                           |                                                                                                   |
already known to occur (Lapalala, Touchstone, etc.) and at least one more is planned for Moepel Farms. An outright restriction may therefore be a problem. I suggest the development of airstrips is limited to one small airstrip for small plains per 50km² area, to keep the number of airstrips down to a minimum.

- For Zone 2, the same problem arises when stating that "no clearing of indigenous vegetation should be allowed"; as it is also an impossible standard, as indigenous vegetation occurs everywhere. This will therefore also need some greater clarity. What could be used is the term "small to medium sized tourism facilities in areas that are not known to be ecologically sensitive, with limited impact", implying a development that is developed on less sensitive land with limited ecological and visual impact.
- The same sort of adjustments regarding the non-removal of indigenous vegetation will have to be made for all the other zones.

3. In terms of our process for the Waterberg Biosphere, we should have a rough draft of the possible Biosphere boundaries and zones by the 23rd of September, so we may send you some more comments then. We otherwise endorse your zonation proposal and hope these comments are useful.

The Waterberg Biosphere Reserve (WBR) has, together with the Waterberg District Municipality, commenced the process of developing a Management Plan for the WBR, which will assist the Biosphere in capitalising on its environmental and economic potential by guiding decision-making that will ensure the sustainable development of the area. The Management Plan will also serve to prepare for the periodic review of the WBR required by UNESCO in 2011.

<table>
<thead>
<tr>
<th>WESSA</th>
<th>Luke Perkins</th>
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<tr>
<td>1. In general I agree with them. I want to ask: what do they mean? How much weight do they carry? Specifically, there is an application for prospecting for coal just north of Nylosvley Nature Reserve, in the catchment area of the Nyl River. This is in brown on your map, i.e. agriculture. Would mining be permitted there? What would happen to mining or prospecting outside the designated blue/grey mining zones? Will the DME receive this zonation, and use it to inform their decisions?</td>
<td>Comments and inputs noted.</td>
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<tr>
<td>D. Dunkeld-Mengell</td>
<td>1. As regards the Nyl floodplain I notice that it is safely described in Zone 1, but quite a lot of the catchment that supplies it is designated in Zone 10: Agricultural priority with a commercial focus. It is concern to us that this could also include coal mining? Would it not be possible for the area surrounding the R101 to the west of the floodplain be designated as a Zone 9? Comments and inputs noted.</td>
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| Dabchick Wildlife Reserve Peter Oberem | 1. Herewith the farm details as requested I would be most grateful if you could plot these on a bigger scale map so I can be sure of the implications of the EMF recommendations on my property  
- DABCHICK WILDLIFE RESERVE Portions: remainder of portion 2; portion 3; and portion 7 Kliprivier KQ 464. Since we sent you the detail map we have refined the zones further. The hilly/mountainous area to the south of your property is now also classified as Zone 1. At a first glance it seems possible to use your property as a link between the “two Zone 1’s”. I have to check a number of requests (several property owners want to be included in zones 1 or 2 – quite a surprise) on the satellite images, sensitivity assessment etc. before we finalise the zones for inclusion in the Draft EMF Report which should be available from the 12th of October for public viewing. As soon as we finalise the zones I will forward it to you. The approximate location of the property is indicated on the attached map. |
| Richard Wadley | 1. I think that in general, you’ve compiled a very reasonable and fair proposal for the zonation of the District. In my view, though, there is at least one aspect that you might like to review:  
- Within Zones 1 and 2 you show several isolated patches of Zone 9 activity. This is understandable, as these are existing (mainly agricultural) activities over which your proposed zonation has been superimposed. However, I suggest that some qualification should be attached to such patches of Zone 9 activity, to the effect that a) no expansion of any non-conservation oriented activity should be permitted; and b) that the owners/occupiers of such land should be made aware of their surrounding environment and be encouraged to transform their current activities to ones that are more compatible with Zones 1 and 2. Any change of ownership could even be accompanied by a requirement that activities be limited to those compatible with Zones 1 and/or 2.  
2. Another comment I would make is that the current and Comments and inputs noted. |
likely future growth in and around the village of Vaalwater (Mabatlane) should be reflected by a somewhat larger area of urban focus (Zone 7) than is currently portrayed.

3. Finally, we should note that the proposed Thupela photo-voltaic project north of 24 Rivers falls within Zones 1 or 2 (or even a patch of Zone 9). All three zone definitions would prohibit such a development from proceeding. I support this prohibition, certainly in respect of Zones 1 & 2 and the isolated patches of Zone 9 referred to above; but in fairness to the developers, they should be made aware of this proposal while their project is still at an early stage of planning, in order that they have an opportunity to relocate it - possibly to the areas of Zone 7 or 9 immediately surrounding Vaalwater.

<table>
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<tr>
<th>Fahad Private Game Reserve</th>
<th>Hendrik Tempel</th>
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<tr>
<td>1. Although not in our direct area I see that the MAPUNGUBWE game reserve is not identified as Zone 1, which it surely should be.</td>
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<td>2. We would like to strongly request that you motivate this sector to be amended to <strong>Zone 1</strong>, or alternatively to <strong>Zone 2</strong>. Our reasons and motivation are as follows:</td>
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<td>• Fahad Private Game Reserve forms the greater portion of this area. It is a private game reserve of about 13’000 hectares.</td>
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<td>• The other neighboring farms – as indicated on the map – are all up market game farms, with varied activities directly focused on conservation and/or breeding with scares species, etc.,</td>
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<td>• No agricultural activities are carried out on these farms.</td>
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<td>• Fahad Game Reserve and most of the neighbours are busy registering a ‘Bavaria’ area, which includes the farms indicated on the map.</td>
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<td>• We are bordered in Botswana by the TULI Block.</td>
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<td>• The total area is about 25’000 hectares.</td>
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<td>• The northern border of this area – WHICH IS ABOUT 40 KILOMETERS LONG - falls inside the ‘golden horseshoe’ – an area ranging all along the Limpopo River from the North-West province, past Mapungubwe, up to where it leaves South Africa in the east. This was initiated years ago by conservationists in order to protect the pristine Limpopo River vegetation and flood plain as a heritage.</td>
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<td>• Most of our parameters fall within the preferred and/or compatible activities as listed in your document.</td>
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<td>• In combination close to ZAR300 million has been spent on lodging, infrastructure, tourist attractions, scares game and lodges.</td>
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<td>• These reserves/farms are not ordinary game farms and our classification in a traditional farming area is not correct.</td>
<td>Comments and inputs noted.</td>
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3. In short our specie lists is as follows:

- **Game species on the reserve:**

- **Predators and carnivores on the reserve:**
  - Cheetah, Leopard, Brown Hyena, Caracal, Civet, Serval, African Wild Cat, Aardwolf, Black-backed Jackal, Bat-eared Fox, Cape Fox, Honey Badger, Genet, Polecat, Mongoose.

- **Small mammals on the reserve:**
  - Aardvark, Pangolin, Hedgehog, Porcupine, Hare, Springhare, Ground & Tree Squirrel, Galago, Vervet Monkey, Baboon.

- **Birds on the reserve:**
  - Almost 400 species listed by Roberts

- **Specially protected or endangered mammals on the reserve:**
  - Antbear, Pangolin

- **Specially protected or endangered birds on the reserve:**
  - Bateleur Eagle, Tawny Eagle, Martial Eagle, Cape Vulture, Lappet Face Vulture, Pel's Fishing Owl, Grey Headed Parrot, Ground Hornbill, Peregrine Falcon, Cori Bustard, Whitebacked Night Heron, Yellowbilled Oxpecker.

- **Protected mammals on the reserve:**
  - Aardwolf, Civet, African Wild Cat, Bushbaby, Cheetah, Bat-eared Fox, Cape Fox, Giraffe, Hedgehog, Hippo, Honey Badger, Leopard, Mountain Reedbuck, Sable Antelope, Serval, Steenbok, Tsessebe.

- **Protected reptiles on the reserve:**
  - African Python, Black File Snake, Cape File

- **Number of mammals:**
  - ~6600

- **Size of the reserve/area:**
  - ~25000 Hectares

- **Geography:**
  - Limpopo River on northern boundary opposite Botswana Tuli Block, Mogol River Eastern boundary. Riverine Forest and vlei savanna along the Limpopo mixed Bushveld and sweet Bushveld savanna to the south.

- **Special breeding projects:**
  - Sable Antelope. Zambian and Zimbabwean blood lines Buffalo, Black
<table>
<thead>
<tr>
<th>Sasol</th>
<th>Mark Epstein</th>
<th>Comments and inputs noted.</th>
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<tr>
<td></td>
<td><strong>1. Zone 5 – page 6</strong></td>
<td>In terms of Zone 5 as described, we would recommend the following:</td>
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<td>• That the last sentence be changed to: “The zone’s relationship to existing and likely future transportation infrastructure and urban development is also important.”</td>
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<td>• In the “Preferred activities” section the sentence “Activities and development directly related to and in support of the industrial activities, including urban support functions” is too vague in terms of the issue of residential developments, nor does it raise the issue of support services and industries. In order to give greater clarity and align with the Lephalale Municipality Spatial Development framework 2009 (SDF), we would propose the following two sentences in place of the previous sentence:</td>
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|       |               | ○ “Residential developments directly related to energy projects of national magnitude, where a clear motivation linking a particular land-use to the heavy industrial activity has been submitted to the council for approval”.
|       |               | ○ “Support services and light industrial activity directly related to and in support of the heavy industrial activities”.
|       |               | • In the “Compatible activities” section, we recommend you change the last sentence as follows: “Roads, railways and other... |
infrastructure that is necessary for the safe and proper transportation of industrial products and people.

- In the “Undesirable activities” section, we recommend that you add the following points:
  - Unco-ordinated fragmented development of urban areas, industry and infrastructure that results in lower efficiencies, higher costs, greater environmental impact and the area not reaching its full economic and social potential.
  - Proclamation of protected conservation areas that would reduce the industrial potential of the area.

2. Allowance for the potential development area 1 as indicated in terms of the Lephalale SDF

- It is recognised in the description of the “Zone 5 - Potential large industrial and related activities focus areas” that urban support functions are considered. This has been given greater definition in terms of the comments above. However, it is a concern that the urban support functions or residential developments could be dispersed throughout the zone 5 area. It is proposed that this be remedied by defining another zone e.g. “Zone 12 – Residential for heavy industrial activities”. This zone should be limited to the potential development area 1 (PDA1) in terms of the Lephalale SDF. The description should align with “Residential developments directly related to energy projects of national magnitude, where a clear motivation linking a particular land-use to the heavy industrial activity has been submitted to the council for approval”. The activities for this zone should align with the activities as proposed in the zone “Urbanisation focus areas” descriptions.

- Including Zone 12 in the EMF would then change the definition of Zone 5 in that “Residential developments directly related to energy projects of national magnitude zone”, would not then be included in the zone 5 area as residential developments would have their own designated zone.
| Andrew Miller & Associates | 1. I have received your proposed map and zonation identification from our farm manager. Do you have a more detailed one indicating roads rivers and smaller towns like Melkrivier and Marken. We are situated on the melkrivier Marken rd on portion 1 of the farm Slangfontein 655LR in Mokgalakwena Local municipality. Please will you also advise of the connection, if any between the EMF and the Biosphere and how the two are linked? | A map of your property in relation to the zones is included. The EMF should be regarded as a broad framework for environmental management in the district as a whole. The Biosphere Reserve is an implementation mechanism to guide conservation land use in a specific part of the district. The two products are supportive of each other but differ in respect to focus and function. We are working closely with the team that is revising the Biosphere Reserve boundaries. |
| Prudence Miller | | |
| Bateleur Nature Reserve | Having had a look at the various zones and the zone in which I have my lodge and game reserve (zone 2) I am quite satisfied with your findings. | Noted. |
| Wouter Schreuders | | |
| Waterberg Nature Conservancy | I can't emphasize enough how important it is that the final zoning maps and accompanying descriptions and criteria that one of you is preparing for the WBR Management Plan and the other is preparing for the WDM Environmental Management Framework be identical. I'm sure you both have high hopes that your final products will not end up sitting on shelves, unused, and you may even have a dynamic plan to be sure that doesn't happen. I believe one of the most important users of your documents should be the LEDET people dealing with EIAs and the Limpopo Development Tribunals dealing with DFAs. Having attended several of their meetings and communicated with the relevant staff, my impression is that those bodies simply have no guidance for their analysis. Their decisions are based on consultant arguments rather than the public good. They do not reflect any vision larger than the proposed project and in fact they have no regard for the bigger picture of the Waterberg. Your final documents at least have the potential to provide them with guidance. But, a big but, if the MP's zoning is any different from the EMF's zoning, both will be useless for this purpose. While I have your attention, please note that in 2007 the Waterberg Nature Conservancy prepared a set of environmental guidelines for developers. Our intent then, and still, is to use these guidelines to engage developers constructively. I've shared these with most of the consultants working on residential projects in the Waterberg, but most have given no indication that they've even glanced through them, much less utilized | Comments and inputs noted. |
| John Miller | | |
thems. That’s not stopping me from sharing them with you two consultants.

Note that the cover states the following: “In the absence of the pending master plan for the Waterberg region, the Waterberg Biosphere Reserve refers to this document as an objective set of guidelines developed by one of its key stakeholders.”

COMMENTS RECEIVED FROM STAKEHOLDERS AND INTERESTED & AFFECTED PARTIES ON THE DRAFT ENVIRONMENTAL MANAGEMENT FRAMEWORK REPORT

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<tr>
<th>Stakeholder / I&amp;AP</th>
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<th>Responses</th>
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</table>
| Thupela Energy     | 1. We are in support of the overall sentiment of the Waterberg district EMF document wanting to put guidelines in place to protect the natural beauty and biodiversity, and to promote the ecological integrity of the Waterberg area from developments that might negatively impact. We do however feel that attention could be given to a sustainable eco-friendly energy plan for the Waterberg. Currently it is planned that power for the Waterberg will be completely derived from coal fired power stations. We feel there is the opportunity in the Waterberg to further the environmental credibility by looking for alternative renewable sources of energy that can positively impact on the area.  
2. Renewable energy, carbon footprint, environmental credibility and branding of the Waterberg  
   Renewable energy technologies can play a significant role in enhancing the environmental credibility of the Waterberg area through reducing the carbon footprint. We cannot turn a blind eye to the fact that at present the Waterberg is relying on dirty energy from the coal fired Matimba power station, and thus has a substantial carbon footprint. One only has to think of all the pivot lands along the rivers in the Waterberg that require large amounts of electricity to run their pivots. For the Waterberg to gain environmental credibility it should be looking towards eco-friendly alternatives. Small scale photovoltaic solar plants (less than 10 MW) on hidden disturbed lands, solar water heaters on houses and lodges, and micro-hydro are some examples of renewable energy that would greatly help reduce the carbon footprint of the area without negatively impacting on the environment or the ‘sense of the place’. Other sources of eco-friendly renewable energy to consider are those derived from renewable carbon such as small scale biomass and biogas energy production from agricultural waste products (eg pig manure, veld management residue such as alien vegetation removal and bush encroached lands). It is also important to note that eco-tourism is now a | |
major driver of economic activity in the Waterberg, and is central to its sustainable development. International eco-tourists are becoming increasingly concerned about issues such as the carbon footprint of their holiday, and in particular that of the long-haul flight associated with trips to South Africa, which constitutes the overwhelming majority of the footprint. Unfortunately, for European visitors, South Africa comes near the top in terms of carbon footprint for air travel compared to other sunshine and wildlife destinations. Tour operators have already highlighted this as a serious issue for their clients, and there is a strong desire among tour operators to offer credible carbon offsetting projects – preferably based in the Waterberg itself.

3. It is illuminating to consider the carbon mitigation and offsetting potential of small scale solar PV in the Waterberg area:

Carbon footprint of typical long haul flight to South Africa from EU: 2 Tons
Direct CO₂ emissions saved per year by 5MW tracking solar PV plant: 13000 Tons
Number of international tourists who can offset their flight emissions via a 5 MW PV plant: 6500

There is a tremendous synergy between some forms of renewable energy and conservation and ecotourism. The Waterberg area should be striving towards renewable clean energy to enhance its credentials as an ecotourism destination by attempting to reduce its carbon footprint. This improved environmental credibility would greatly enhance the potential for branding of the Waterberg area.

4. Eskom loses, voltage stability issues and generation plant siting

Supplying the Waterberg with power presents a number of challenges for Eskom. The Waterberg contains many extremely long Eskom distribution lines, including the VS line, the longest such line in South Africa. The length of these lines creates two significant problems:

- Extended transmission along low-voltage lines results in very high losses.
- It is very difficult to maintain satisfactory voltage stability over such long transmission lines. The resistive losses mean that there is inevitable voltage drop towards the end of the line, and also substantial voltage variations as user load varies with time. Both these effects significantly reduce the quality of service provided to Eskom customers along such long distribution lines.

5. The simplest solution to both issues mentioned above is to input additional power (from a eco-friendly renewable source) part of the way along these long transmission lines. The effect of this is rather like that of propping up a drooping washing line with a pole midway
along its length – the line will not sag as much and will not change its degree of sag so much when washing is added to, or taken from, the line.

Eskom have expressed the opinion that small power generation facilities sited part of the way along these over-long transmission lines will significantly help them maintain a good quality service to the community, and significantly reduces wasteful resistive losses on their network.

6. Energy security

All Waterberg residents including eco-tourism destinations are familiar with Eskom outages, which occur regularly. Due to the long transmission path by which electricity reaches the Waterberg (Matimba – BelaBela – Modimole – Vaalwater - distribution lines), users can lose supply due to faults anywhere along this route. For example the whole Waterberg recently lost power for 4 days due to someone cutting down two electricity poles between Modimolle and Vaalwater.

Having an electricity generation capacity within the Waterberg proper itself will provide some degree of energy security. For example, during power outages the most critical problem is always supplying water via pumping from bore holes. During the recent crisis mentioned above, some Waterberg residents (naturally the poorest, who are always most vulnerable) endured extreme hardship due to lack of water. Even a reduced, daytime-only, supply of electricity would enable basic water supplies to be maintained during an Eskom outage. Small scale eco-friendly renewable energy plants could provide enough power to cover this basic human need.

Sasol Mafutha (Pty) Ltd; Sasol Mafutha Mining (Pty) Ltd; Sasol Mining (Pty) Ltd and Sasol Oil (Pty) Ltd
Mark Epstein

1. Page 61 – Section 2.11 “Planning and Development”. There is a proposal for large dams to be established in the area rather than importing water from other catchments. We do not agree with this proposal as it is our understanding that:
   - There is no extra water available and that larger dams will not improve this situation;
   - It is not practical to build dams in flat areas and therefore the only practical place where dams can be built is in zone 1 where the mountains allow for damming.

2. Page 62 – Section 3.4 “Tourism”
It may be an idea to suggest the promotion of a building management program where guidelines are given in terms of building styles, colours, use of solar energy and water use. This may be used in order to enhance the “Bosveld” and or reduce the environmental impact of the development on the area. E.g. neutral paint and thatched roofs may reduce the visibility of buildings.
Furthermore, in Zone 1 and Zone 2 areas, in order to limit the impact of buildings and infrastructure on the
aesthetics of the area, there may also be a requirement to restrict the construction of buildings or infrastructure above a certain height on mountain and hills. This could be listed in the “undesirable activities” in Zone 1 and Zone 2 descriptions. This principle is being used successfully as means to project the Magaliesburg range.

3. Page 68 - Zone 1 and page 69 – 2
There is a statement under service infrastructure” that roads should be kept to a minimum standard necessary”. This is rather a vague statement and does not deal with the intent. Is it to keep unwanted traffic out and if so, where the R33 may be the most direct route for commuters and heavy equipment haulers how can one encourage the use of alternative routes that skirt the sensitive zones. This can be done by providing alternative, more direct routes or routes that are maintained in better condition than the R33.

4. Page 73 – Zone 5 section 5.6.2
“Desired state – Housing” – the grammar is confusing. Propose to change to “Housing should preferably be concentrated…..”

5. Page 73 – Zone 5 section 5.6.3
“Preferred activities”, second bullet. We previously commented on this bullet in our letter SMV-CO-ENV-L-0108 of 22 September 2010.

The reference to support services and light industry has been added. However, as per our previous comment, the sentence is too vague in terms of urban support functions. We again suggest the wording below which ties-up with the intention of the Lephalale SDF of September 2009 as well as making it clear that urban development would only be done if it is associated with heavy industrial development.

- Residential developments directly related to energy projects of national magnitude, where a clear motivation linking a particular land-use to the heavy industrial activity has been submitted to council for approval
- “support services and light industrial activity directly related to and in support heavy industrial activities”.

6. Page 73 – Zone 5
We propose the inclusion of a principle that should any urban development take place that it should meet the intentions of the Zone 7 – Urbanization Focus Areas.