

## **INTERNAL REVIEWER'S REPORT**

### **DRAFT SCOPING REPORT:**

### **“PROPOSED EXPANSION PROJECTS FOR THE RÖSSING URANIUM MINE IN NAMIBIA: PHASE 2 ~ EXTENSION OF CURRENT SJ OPEN PIT, NEW MINING IN SK AREA, INCREASED WASTE ROCK DISPOSAL, INCREASED TAILINGS DISPOSAL, HEAP LEACHING FACILITY, SULPHUR HANDLING AT PORT OF WALVIS BAY”**

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This document comprises a formal record of my review of the Draft Scoping Report for Phase 2 of the Social and Environmental Impact Assessment conducted by Ninham Shand Consulting Services. The report was sent to me as four PDF files by Ms Genie De Waal of Ninham Shand Consulting Services via email on 17 April 2008. The four documents provided to me comprised the draft Scoping Report in two parts, accompanied by two documents of supplementary annexures, comprising copies of correspondence and records of public meetings. The review of the draft Scoping Report required frequent reference to the earlier draft SEIA Report that had been produced for Phase 1 of the proposed expansion at Rössing Uranium Mine.

I have structured my comments on the draft Scoping Report into seven sections: Scope of study, Technical completeness of report, Reliability of information provided, General appearance of report, Terminology and language used, Acceptability of the draft Scoping Report, and Overall impressions; these are listed below. My review is based on my professional judgement and experience as a Certified Environmental Assessment Practitioner.

#### **1. Scope of study**

The draft Scoping Report covers the scoping phase of a comprehensive study of the potential environmental impacts that might occur in the second phase of planned expansion activities at Rössing Uranium Mine. The draft Scoping Report is supported by nine annexures that record the details of public information documents, public meetings, press announcements and official correspondence relating to the investigation. The planned second phase expansion activities at Rössing Uranium Mine complement and extend the activities that were investigated during the first phase of study.

It is noted that Rössing Management continue to use the term “SEIA” instead of the more normal “EIA” for this study as a way of emphasizing the importance that they attach to social issues. This should be seen as purely an internal approach because the word “social” in “SEIA” is redundant.

#### **2. Technical completeness of report**

The scope and content of the draft Scoping Report are in full accord with standard practice for EIA scoping reports that describe the concerns expressed by stakeholders and specialists, and the initial evaluation of the potential impacts of planned development activities. The draft Scoping Report provides a firm basis for the definition of specific technical investigations that will need to be conducted during the impact assessment phase of study to evaluate particular impacts.

The evidence presented in the draft Scoping Report is supported by clear descriptions of the need for the project, the particular activities comprising the second phase of planned developments, the potentially affected environment, the anticipated scope, and the scale and complexity of the potential impacts that are likely to occur, and the alternatives that need to be considered. This evidence is then translated into firm Terms of Reference for the various specialists who will conduct the more detailed studies during the impact assessment phase. This matches well with accepted professional practice for scoping reports in environmental impact assessments.

I list here the few minor points that the Consultants should address when preparing the final version of the Scoping Report. Importantly, these corrections are all minor and do not detract from the technical completeness of the documents reviewed by me.

#### *Draft Phase 2 Scoping Report*

- Page vi – glossary – the word “kilogram” should be corrected to “kilogramme”. The use of an “English (UK)” spellchecker instead of an “English (US)” version would eliminate this problem.
- Page vii – glossary – the words “milligram” should be corrected to “milligramme”; the word “meter” should be corrected to “metre”; the word “tonne” should be corrected to “tonnes”. Once again, the use of an “English (UK)” spellchecker would eliminate this problem.

### **3. Reliability of information provided**

The information provided in the draft Scoping Report has been extracted from earlier documents on the first phase of study plus a series of public meetings with stakeholders, while the information provided for each of the proposed activities comprising the planned phase 2 extension of mining activities has been provided by Rössing Management. The methods that will be used to assess the extent and significance of potential impacts and the scope of additional studies required are carefully detailed. Importantly, the derivation of significance ratings follows an unambiguous set of guidelines. This type of standardized approach removes uncertainties and is fully in accord with current best practice.

The draft Scoping Report follows normal professional practice in referring to possible impacts as “potential impacts” – recognizing that if authorization to proceed is granted by the Namibian Authorities, then the impacts are very likely to occur as predicted.

### **4. General appearance of report**

The draft Scoping Report is logically structured and attractively laid out, with a good balance of text, supporting graphics and photographic illustrations, and white spaces. The numbering system used in the report provides clear guidance to readers and is linked to the detailed contents page. All tables and graphs have been carefully laid out and the photographic and other illustrations are of excellent quality.

All of the graphical illustrations and photographs help to illustrate and explain the perspective provided in the written text. However, much of the additional value of these illustrative materials will be lost if the final report is printed in black and white.

### **5. Terminology and language used**

The draft Scoping Report has been professionally produced and has been written in a clear and easily understood style. Where specific technical terms have been used to convey some aspect of a complex technical process or situation, these terms are clearly explained. The detailed glossary provides a set of clear explanations for scientific units, terminology and specific institutions.

The detailed records of the matters raised at public meetings provide a clear overview of the range and complexity of the concerns expressed by stakeholders. These concerns and their underlying issues form the basis for technical evaluation of potential impacts. In my professional opinion, the record of public meetings and the incorporation of public concerns into the body of investigations to be carried out during the impact assessment phase of study accord fully with best professional practice.

## 6. Acceptability of the draft Scoping Report and annexures

In my professional opinion, the draft Scoping Report and its supporting annexures fulfil all of the professional and technical requirements for a comprehensive Scoping Report. I consider that the report provides a well-balanced, clear and unambiguous assessment of the issues related to the planned expansion activities, and details how (and by whom) these potential impacts will be evaluated.

One possible concern relates to the issue of cumulative impacts that might occur as a result of interactions between specific project component activities in phase 2, and of phase 2 activities interacting with phase 1 activities. This is a complex issue and the Consultants need to provide a clear evaluation of the likelihood, scope and scale of such cumulative effects. In some cases, cumulative impacts can have a far greater – and often long-lasting – effect on social, economic and ecological issues than any of the individual activities.

## 7. Overall impressions

The draft Scoping Report and its supporting annexures contain an impressive array of technical information. While some readers of the report may find this level of detail excessive, the details provide excellent value to decision-makers, investigators and the project proponent. In addition, the high level of detail provides a clear assurance that the Consultants have recognized the importance of carefully recording all aspects of the investigations and participation processes.

My overall impression after reviewing the documents is that the draft Scoping Report is of high quality, a good reflection of the professional competence and abilities of the Consultants, and should be accepted as fulfilling the requirements for a Scoping Report.

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