

Comments received prior to Draft Scoping Report release

Comments received via e-mail:

**From:** Danny Meyer

**Sent:** 13 October 2012 05:18 PM

**Subject:** Rössing Uranium Ltd - SEIA for the proposed mining of the Z20 Uranium deposit

Good afternoon,

Thank you for including SMEs Compete on the information distribution list.

The document that provides background information on the mining operation and sets out the proposed mining expansion intention of Rössing Uranium Limited, sent with your e-mail of 12 October 2012 as an attachment, has been reviewed. We have also taken note of the dates and times of the upcoming public scoping meetings in Arandis and Swakopmund respectively.

It is the view of SMEs Compete, based on the track record of Rössing Uranium Ltd and on our knowledge of the *modus operandi* of the mine, that all due care and attention will be taken by the firm as it expands its operations in the vicinity of Arandis. It has done so in the past and we have no cause or reason to believe that this proposed expansion will be tackled by Rössing Uranium Ltd, differently. Furthermore, Rössing Uranium Ltd is embarking on a Social and Environmental Impact Assessment (SEIA) in a structured and responsible manner. This we find commendable.

We are confident that the Government of the Republic of Namibia (GRN) and its respective ministries, regulatory departments and institutions, will closely monitor and evaluate every stage of the proposed mining expansion programme of Rössing Uranium Ltd.

In summary, as a social entrepreneurship entity that routinely provides business growth support (wealth and job creation) to Arandis based small and medium enterprises (SMEs), SMEs Compete believes the proposed development by Rössing Uranium Ltd will benefit the town's local economy. Resultantly it might even create new business opportunities for local emerging, novice and established entrepreneurs.

Unfortunately it is not possible for SMEs Compete to attend any of the upcoming meetings due to prior work commitments. However, should we have attended, comments that we will have made at a meeting, will have been along the lines set out above.

Sincerely,

Danny Meyer

SME Compete

**From:** Peter Cunningham  
**Sent:** 14 October 2012 04:50 PM  
**Subject:** Z20 Rossing

Dear Ilse

**RE Z20 Rossing Development**

Something of potential concern in the proposed development area would be the presence of the endemic & range restricted Husab Sand Lizard (*Pedioplanis husabensis*) in the area - mainly found on grey/white geology. See attached paper I had published recently on the species from the Husab area after doing work there.

Regards

Peter Cunningham

**From:** du Plessis Nicolaas  
**Sent:** 22 October 2012 09:03 AM  
**Subject:** FW: Rössing Uranium Ltd - SEIA for the proposed mining of the Z20 Uranium deposit

Dear Robyn

Could you please indicate what impact the mining and processing of the new ore body will have on Rössing's water demand?

Kind regards,

NP du Plessis

**From:** Otto Gunther  
**Sent:** Saturday, October 20, 2012 10:16 AM  
**Subject:** RE: Rössing Uranium Ltd - SEIA for the proposed mining of the Z20 Uranium deposit

Hi Werner

Is the road to be going up the "old Railway valley" or another one?

I heard if RUL should (for the time being off the cards) work together with Husab they contemplated a conveyor belt across the distance and the Khan River?

Best regards

Hartmut Oscar Fahrbach

**From:** Ben Truter

**Sent:** Wed 2012/10/31 09:06 AM

**Subject:** RE: Rössing Uranium Ltd - SEIA for the proposed mining of the Z20 Uranium deposit

Good day Ms. Rautenbach

I was at your meeting at Rossmund on 24/10/12 and as a result of my report to my seniors, they have a few queries regarding the process. I am not an expert on these matters and is just the go-between.

1. Is there going to be a seepage monitoring system to be put in place to monitor seepage from the new High Density Tailings Storage on the Rössing Dome?
2. Are you in the process of acquiring a Clearance Certificate for tailings deposition?
3. What is the impact on acid-mine drainage on receiving envelope 4. Where is the proposed acid plant going to be and what will the impact be on groundwater?
5. On page 5 of your Background Information Document is a table with potential environment issues. The arrows indicated on the table does not differentiate between positive and negative impacts. Please distinguish what is positive and what is negative.

Thanks for your time and we look forward to hearing from you.

Ben Truter

Division Geohydrology

**From:** earthlife  
**Sent:** Wednesday, October 31, 2012 11:33 AM  
**Subject:** Earthlife on Z20

Dear Ilze, dear Werner,

Attached please find Earthlife's submission to the Background Information Document for the Social and Environmental Impact Assessment for the proposed mining of the Z20 Uranium Deposit

We appreciate your soon response.

Kind regards,  
Bertchen



## Earthlife Namibia

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Enquiries: Bertchen Kohrs  
Date: 30 October 2012

**Re: Submission to SLR**  
**Assessment for the proposed mining of the Z20 uranium deposit by Roessing**

***Comments on a general note:***

It is rather mysterious that on the one hand Namibia receives international awards for good management of the natural environment and its biodiversity and on the other hand government allows uranium mining in the protected Namib Naukluft Park. The reason to proclaim a National Park is to protect the natural environment and not to spoil it.

Our rivers are a national pride and as such all Namibians should be properly informed about such drastic impacts like a road and other service infrastructure across the Khan River. Public meetings should be held not only in Arandis and Swakopmund but also in Windhoek and other towns. All citizens should have a chance to make an informed input.

***Specified comments and concerns:***

- 1) Page 3 on the Background Information Document:  
The satellite photo shows the Z20 uranium deposit partly outside the Project Area of the Mine License Area. Please explain.
- 2) Page 5:  
Quote: "A number of potential positive and negative impacts on the socio-economic and biophysical environment, which could result from the proposed project, have been identified."  
Job creation and income for government through taxes and royalties will rightly be identified as positive socio-economic impacts. However, Earthlife is interested to learn about identified positive impacts on the **biophysical environment**.

- 3) To Earthlife's knowledge, a road and other service infrastructure across the Khan River is planned by Swakop Uranium for the Husab project. Is it really necessary to build twice infrastructure facilities within a relatively short distance in such an ecologically sensitive area? Is it not possible linking interests in order to preserve our fragile natural system?

Recommendations by the Strategic Environment Assessment (SEA) and the follow-up Strategic Environment Management Plan (SEMP) should be taken seriously and negative impacts be avoided as much as possible.

- 4) You might be aware that on Earthlife's request the Commission for Independent Research and Information on Radioactivity (CRIIRAD) in 2011 took samples of sediment, soil and water in the vicinity of the current Roessing Uranium Mine. Although the results of these samples still have to be compared with monitoring data gathered over a long period by Roessing and Water Affairs, the preliminary findings show uranium-238 contamination of underground water (as well as soil and sediment) downstream the Roessing Uranium Mine in the Khan and Swakop River alluvium (please see results below).



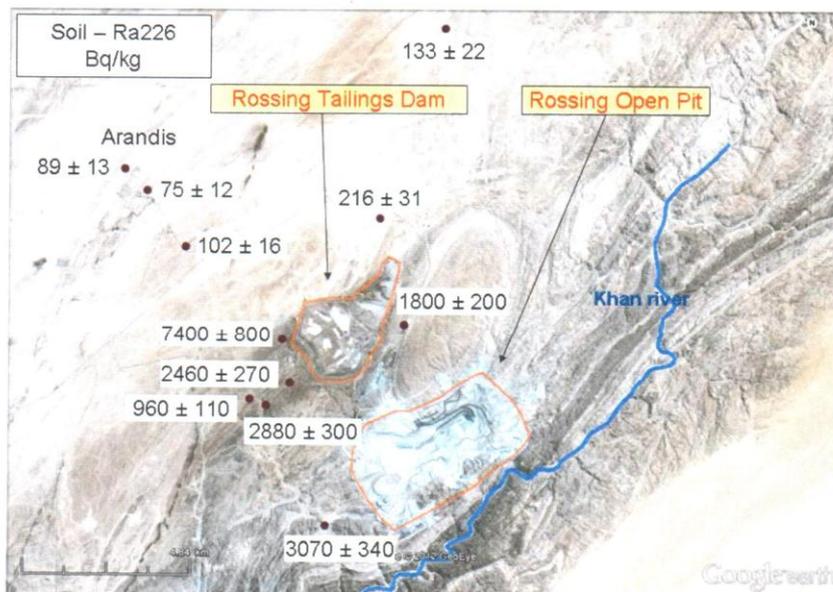
#### Uranium-238 concentration in underground water samples

This raises the question of the origin of uranium-238 contamination.

The current waste rock dump is very near the Khan River. CRIIRAD's measurements reveal high radioactivity of some rocks which may contribute to uranium-238 contamination.

On request we gladly send you CRIIRAD's preliminary report.

- 5) Earthlife strongly recommends additional independent analysis of soil and underground water of this specific area and transparent consultation before any further activities are carried out. All uranium related operations may increase contamination which, as you know, may haunt future generation for 100 000 years because of the long half-life of certain radio-nuclides released during the mining process as e.g. thorium-230 with a half-life of 75 000 years.
- 6) Please elaborate on the tailings.  
Earthlife understands that the current tailings dam of Roessing has no lining and is thus predisposed to underground leakage. In fact, CRIIRAD detected radium-226 contamination as far as 2 km distance from the tailings dam which indicates contamination from the tailings dam (please see results below).



Radium-226 activity in top soil samples

- 7) The current waste rock dump is neither confined nor designated by warning signs. People entering the area may be exposed to radiation not being aware of the danger.  
What are the safety plans for the new waste rock dump?
- 8) Roessing will have a greater demand on water and electricity. Shortage of both is experienced already under current conditions.  
Where does the water come from?  
Where does the electricity come from?
- 9) What will happen with the Z20 project if the uranium price does not recover?  
Please elaborate on the restoration management plans in such a situation.
- 10) How will Roessing deal with the increasing demand of social infrastructure, e.g. housing, schooling, medical care etc. in an already stressed situation.
- 11) We want to see a proper management plan for restoration during construction, mining and after mining activities.
- 12) We want to know how much money will be set aside for restoration and who will administer these funds.
- 13) When will the draft ESIA be available for public input?
- 14) Are you aware of the LLA study recently done by some local and foreign researchers on the Vulnerability of Central Namib by Mining, highlighting the loss of endemic biodiversity in the area of mining which includes the Z20 site?

Earthlife trusts that our concerns will be seriously considered in the ESIA and EMP.

- End -

**From:** Marcia Stanton

**Sent:** 31 October 2012 08:48 PM

**Subject:** Re: Rössing Uranium Ltd - SEIA for the proposed mining of the Z20 Uranium deposit

Dear Robyn,

To follow up on the points made during the public meeting, I'd like to confirm and add the following for your consideration. Please note that this is not an exhaustive list of all of the studies that need to be conducted. It is assumed that the Consultant will conduct a full set of additional studies not mentioned below:

1. There is a concern that the Z20 uranium deposit is partially outside of the Mining Licence Area and the project area in fact enters more of the Park. Please do a full study on the full impact of the entire proposed area on Park resources inclusive of those areas not in the Mining Licence. Please understand that inter alia, the environment, anything of scientific value and all wildlife (including plants and animals) are protected in a Park. It is critical to mention that in terms of the Nature Conservation Ordinance, mining in a Park undermines much of the law meant to protect the environment. This is of exceptional concern, as the purpose of a park is for the preservation and protection of wild animal life, wild plant life and anything of any scientific interest for the benefit and enjoyment of inhabitants of Namibia.
2. A full study on the impacts on wildlife must be incorporated, including the impact of waste and contamination of park resources (including the health of wildlife). A study looking at the long term impact beyond the life of mine must be incorporated including cumulative impacts of all mining and exploration activity in the area.
3. A full visual and noise analysis must be conducted and its impact on people, (including tourists, workers, and residents) and wildlife must be incorporated.
4. Options to make the infrastructure corridor smaller must be explored. Currently the suggested corridor footprint is quite an extensive area (in terms of the size of the total area impacted). Options to minimise the extensive footprint must be explored from an environmental perspective as an option which stakeholders can look at and comment on. Although other corridor options may not be ideal for the company due to cost, it is necessary from an environmental perspective to explore all options that will have a lesser impact on the environment. As the stakeholders, we should be able to view the most environmentally friendly option.
5. The infrastructure corridor, as part of the Accessory Works, is legally required to be incorporated into the full EIA. All components of a project must be incorporated together in one EIA. The Minerals Act makes it very clear that an EIA must be done for an entire project and all mining operations which include the accessory works of the operation [section 50(i) and section 1(1) of the Minerals Act- see definition of "mining" and "accessory works" as well as section 3.1 of the EIA Regulations Annexure on Listed Activities]. In addition, the various components of a project must be assessed together in one EIA in order to consider all potentially significant effects including the physical, biological, social, economic, cultural and cumulative impacts [EIA Regulations 15(2)(c) and 15(2)(h)(aa)].
6. Accessory Works are defined under section 1 of the Minerals Act to also include all power lines, water pipelines, etc required for the purpose of mining operations or connected with such operations. A full analysis of the full route of all water pipelines, power lines, etc from their source to the mining operation is thus required as part of the EIA process. Only analysing these within the Mining Licence Area is insufficient, as section 1 of the Minerals Act does not limit "accessory works" to the mining licence area. Full cumulative impacts of the entire footprint of all pipelines and power lines must also be incorporated into the full EIA as mentioned in point 3 above.

7. A full analysis of the full life cycle of the waste must be analysed and disclosed. Cumulative impacts of potential contamination of the current site and the additional site must be analysed. Since underground water has already shown contamination (the reason for the dewatering program), it is critical to look at the additional impact of additional waste in the form of tailings and the waste rock dump. Impacts of the additional new sites must be analysed on their own and cumulative impacts of current and the additional sites combined must be analysed in order to assess the full impact of waste. Impacts on the environment (including the health of wildlife) as well as people must be assessed.
8. Although the new tailings facility is proposed to be high density, all options of the best type of tailings facility for health must be analysed. A wetter tailings facility has the additional issue of waste seepage into underground water but a drier tailing facility has the additional issue of waste release into the air. Both options must be analysed from an environmental and health perspective and options should be given to stakeholders that are not based on the cost to the company foremost, but the best options for the health and environment. Cumulative impacts of waste from the old and new waste sites must be incorporated.
9. A full study must be conducted to determine potential worst case scenario impacts (disaster) as part of the various studies and cumulative impacts. A scientific analysis of the types of disasters that could occur and the potential cumulative disasters must be incorporated into the EIA, including cumulative impacts of all mining and exploration activity in the area. The EMP must be based on the science of the EIA in all aspects, including the disaster contingency components. Studies on the Worst Case Scenario (Disasters) must look into the future, beyond life of mine. For example, what will happen when Rossing leaves and cannot continue its current dewatering program? That waste will enter the underground water unhindered and there is no plan currently on what to do with this beyond life of mine. The Namibian Government and the people are not fully informed as to the potential release of hazardous waste and they are not prepared to handle this issue when the company leaves. This is unacceptable and no additional site can be added without a plan for the waste and the virtually guaranteed contamination beyond the life of the mine.
10. A scientific analysis on the long term impact of the components that will not be rehabilitated (waste sites, pit, infrastructure, other facilities, etc) must be incorporated- this study must look beyond the life of mine and the EMP must incorporate issues that require long term planning and funds.
11. A full analysis of the impact (on the environment and people) of additional requirements of water and electricity by the mine must be analysed.
12. A full socio-economic impact must be analysed. The increased demand for housing, education, healthcare, medical care must be analysed and a plan should be in place to help alleviate this situation. In addition, negative impacts on the social structure must be fully assessed.
13. All studies must be conducted from on-site research and in situ studies.

Please let me know if you need any clarification. Thanks very much for your time and consideration!

Have a good day!

Sincerely,

Marcia Stanton

Director, The Earth Organization Namibia

**From:** Michele Kilbourn Louw [<mailto:michelekl@mweb.co.za>]

**Sent:** Thursday, November 01, 2012 11:26 AM

**To:** Werner Petrick

**Cc:** [normang@swakopuranium.com.na](mailto:normang@swakopuranium.com.na); 'Tom Ferreira'; 'Angie Kanandjembo'; 'Deon Garbers'; [gdaly@gti.co.za](mailto:gdaly@gti.co.za)

**Subject:** 121030 Rossing SEIA - Swakop Uranium comments and questions

Hi Werner

Please find attached Swakop Uranium's issues and concerns regarding Rössing's proposed Z20 SEIA project.

Kind regards

Michele



30 October 2012

Mr Werner Petrick  
SLR Environmental Consulting (Namibia) (Pty) Ltd  
House Schumacher  
6 Tobias Hainyeko Street,  
Swakopmund, Namibia

Dear Sir

**SWAKOP URANIUM'S COMMENTS AND QUESTIONS RELATED TO  
THE SOCIAL AND ENVIRONMENTAL IMPACT ASSESSMENT FOR THE  
PROPOSED MINING BY ROSSING URANIUM OF THE Z20 URANIUM DEPOSIT**

Thank you for the invitation to participate in the SEIA process for the proposed mining of the Z20 uranium deposit. Swakop Uranium wishes to be registered as an affected party.

Issues, questions and concerns that we wish to raise, are related primarily to mining of the proposed Z20 uranium deposit and the infrastructure layout, including pit position, waste rock disposal and infrastructure. The other group of concerns are related to the environment and infrastructure planned to cross the Khan.

**Mining and Site Layout Issues**

What are the technical considerations being incorporated into the design of the Z20 pit and support infrastructure? Does Rössing take into account the close proximity of the proposed Z20 pit to Zone 1 pit of the Husab mine?

- Having pits in very close proximity, managed and operated by two companies poses potential risks, for example, to slope stability and safety;
- How will interaction between the two operations, especially during blasting, take place? The two mining operations will be within each other's blasting evacuation radius;
- Has a geotechnical assessment of the impact of mining Z20 adjacent to Zone 1 been undertaken and how have these considerations been incorporated into the Z20 pit design?
- There may be potential impact (sterilization) on the Z20 resource due to mining activities at Husab.

Swakop Uranium also wishes to get more detail on the proposed location of all required infrastructure, including the temporary ore stockpiles, waste rock dump, mine offices, fuel depots etc. The Husab double revenue pit footprint must also be considered during site layout planning.

How will the proposed Z20 operating methodology affect Swakop Uranium's operations and how will operations at Zone 1 affect operations at Z20?

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Swakop Uranium (PTY) Ltd is a wholly owned subsidiary of Extract Resources Ltd



Swakop Uranium assumes that, by virtue of having already obtained a mining license and that construction of the mine is about to commence, Rössing will have to take into consideration all the Husab mine designs, layouts, infrastructure, operating methodologies, etc. and that any adjustment or change that maybe required, will be done on Rössing's designs.

Swakop Uranium would be interested to know the estimated time-frame for the development of Z20, given the early stage level of evaluation of the Z20 ore body at this time. This information would clearly influence the operating methodologies of each mine.

We also suggest that Swakop Uranium and Rössing Uranium should collaborate closely on site layout and mining issues.

#### **Linear Infrastructure:- Mining Licence Area and Environmental Issues**

The BID document describes three sets of infrastructure routes: firstly, the power line route, secondly, the road and pipeline route and, thirdly, the conveyor route. At the public meeting held on the 24<sup>th</sup> October 2012, the three sets of infrastructure were shown in a "corridor" that is almost a kilometre wide in places, primarily because the terrain over which they have to traverse, cannot contain them all in a single, narrower corridor.

- Have alternative access routes been investigated, in particular, from the north east of the Z20 deposit?
- Has the proposed conveyor structure been designed for the wind conditions prevalent in the area?
- Has a conveyor of this magnitude ever been constructed elsewhere in the world? It could potentially be the largest unit ever built and this presents potential risks to its operation and the environment.
- What is the pipeline volume of diesel that Rössing proposes pumping across the Khan River on the conveyor structure? Will this be a continuous feed?

#### ***Mining Licence Area***

From the available information, it is evident that the currently planned infrastructure has to cross the northernmost section of Swakop Uranium's Mining Licence area in order to access the Z20 deposit.

- Swakop Uranium believes that Rössing Uranium should investigate alternative routes that do not cross its mining licence area. Swakop Uranium's double revenue footprint and any future site infrastructure requirements must be conserved. The proposed conveyor, diesel and water pipelines, power lines and road on Swakop Uranium's mining licence area are situated within the blast evacuation radius of pit Zone 1.
- Have these route options been finalised? Or is there engineering work that must still be done to determine if the proposed routes are fit for purpose and which may lead to a change in the proposed route(s)?
- The proposed infrastructure routes across the mining licence area and their associated footprints must be discussed with Swakop Uranium in order to ensure that Husab's mining infrastructure is not compromised. For example, where would the ore stockpile for the conveyor be situated, and how much ground does it need? In what proximity to Husab's power line will the proposed Z20 power line be?



### *Environmental issues*

Rössing is already aware from earlier discussions, of the majority of the environmental issues and concerns raised by Swakop Uranium in connection with the proposed linear infrastructure across the Khan River and onto the Khan/Swakop River watershed. They are reiterated in the comments and suggested additional investigations provided below.

- **Wind Speeds.** Given the proposed height of the conveyor supporting structure, the speed at which the conveyor will travel (~16 km per hour) and the propensity for strong winds in the area, has the effect of the wind on the structure been definitely assessed given the paucity of reliable weather data for the Khan Mine valley? In other words, is there a possibility for the conveyor and its diesel fuel line to be damaged by excessive wind speeds? (or develop resonant vibration at a particular, not necessarily high, wind velocity, *a la* Tacoma Narrows bridge in the USA). Surely wind data should be collected at several points in the Khan River valley and at the design height of 120 m. for at least a year to inform both the design, and to select an optimal conveyor corridor.
- **Air Quality.** Dust containing radio-active material will certainly be blown off the ore being conveyed. Detailed modelling studies of the effects of dust, particularly the radioactive material blown from a height, must be examined as the affected area may be quite large. (Wet crushing can be done, but difficult: refer to the experiences at the recent installation at De Beers Elizabeth Bay Mine)
- What is considered the most effective means of reducing dust off the conveyor and could any palliative affect the operation of the conveyor belt: i.e. can there be build up of congealed material on the belt? If water is used, it is likely that droplets of dust containing radioactive material could drop into the area below the structure and cause soil and surface water pollution.
- **Public exposure to radiation.** Are baseline public exposure pathways to radioactivity to be undertaken over a full year as is best practice?

Swakop Uranium has made every effort to minimise its footprint on the relatively sensitive surface and biodiversity on the watershed between the Khan and Swakop Rivers, and to purposely avoid several areas identified as being sensitive habitat for protected plant and reptile species. Rössing's proposed infrastructure appears to cross these areas.

Following a scientific field study, the preferred habitat for the vulnerable lizard has been identified. The proposed road and pipeline route appears to impact on this habitat and could result in the isolated populations being cut off from populations in the Khan valley. The protected plant species has also been mapped and its ideal habitat occurs in the watershed area where the infrastructure is proposed.

- Because of the possibly restricted and threatened ranges of these species, it is suggested that careful route selection work is undertaken, following more detailed work on the bio-diversity along the infrastructure routes.

The Husab mine SEIA "Sensitivity of collective habitats" plan marked the potential road and pipeline route from the Khan River to the mine site as a "no go" area in that its biodiversity and sensitivity were considered high. A valley further to the east is also marked as very sensitive.



- Has the route selection process taken into consideration the known sensitivity of the bio-diversity in the area as well as technical and financial considerations?

Z20 and the planned infrastructure are situated within the Namib Naukluft National Park south of the Khan River. Tourism and conservation issues need to also be addressed.

- The noise generated by the elevated conveyor will be heard over a larger area of the Khan River valley. The potential effects on camping/tourism sites in the Khan River should be investigated.
- How will the public and wildlife be protected from rocks falling from the conveyor? Are safety measures to be installed on the ground under the conveyor, such as fencing or barricades? Could this affect the passage of animals and people through the area?

Finally, there are certain risks associated with conveyor structure that need to be assessed.

- Diesel spill from conveyor structure:
  - What volume is lost before it's noticed? (i.e. what is the total pipeline volume?)
  - Environmental damage that this could cause to the area over which the conveyor is routed, especially the Khan River and downstream areas?
  - Can this damage be cleaned up effectively?
- Dust from conveyor:
  - What are the public health risks, potential damage to vegetation?
  - Is there a way in which this dust fall-out could be cleaned up effectively?
  - Transportation of radioactive dust downstream in rain/flood events?
- Wind causes conveyor structure to collapse:
  - How much ore would be lost and can it be effectively reclaimed?
  - What potential damage to the environment could this cause?
  - What is the effect of possible belt failure?

In conclusion, it is emphasised that collaborative discussions must be held between Rössing Uranium and Swakop Uranium before any infrastructure positioning, including the linear infrastructure, is finalised.

Yours sincerely

A handwritten signature in black ink, appearing to be "Norman Green".

Norman Green  
CEO: Swakop Uranium

A handwritten signature in black ink, appearing to be "Michele Kilbourn Louw".

Michele Kilbourn Louw  
Manager: Environment

**From:** Venter Willem

**Sent:** 15 October 2012 04:22 PM

**Subject:** RE: Rössing Uranium Ltd - SEIA for the proposed mining of the Z20 Uranium deposit

I have the following comments.

- Why is the water supply issue so insignificant in the document
- What is the projected water demand for this development
- Will Rössing be responsible to distribute the water to and for this development to the Z20 site or will NamWater be requested to engage in this system.

Regards

Comments received via fax:

31 Oct. '12 23:12

BERND SEEFELDT

FAX +00264-64-405622

P. 2

Bernd Seefeldt  
P.O. Box 1411  
Swakopmund  
Tel 064 -405622

31 October 2012

per Fax 064-403 327

SLR (Namibia)  
Swakopmund  
Att. Mr Werner Petrick

Re: Comments to the proposed mining of the Z20 ore body by Rössing Uranium  
- in mining licence and Nature Park area and possibly in connection  
with Chinese's Husab project

Dear Werner,

as permanent resident of Swakopmund preserving a healthy environment not only for the country, but also for the world I let you know about my objections to the project above, as representative of SLR (Namibia) which is an independent firm of environmental consultants to facilitate the SEIA process.

Rössing Uranium was 2007 (2009) nearly at a close down, and its mandatory rehabilitation fund for re-cultivation to be used after a closure was insufficient, but Rössing achieved to receive an even extended life span from the government, without good reputation at that time.

Potential and negative impacts:

Extended mining and infrastructure across the Khan river valley, i.e. conveyor, access road, fuel pipeline, crushing plant a.s.o. requires  
- blasts and hauls which bring more uranium rock to surface,  
- more disposal of waste rocks, and new disposal sites,  
- more natural land transferred to processing area including open pits,  
- more tailing dam pollution of aquifer groundwater  
(Note: Geohydrology contamination by chemically processed uranium compounds which are naturally not water soluble),  
- more destroyed and polluted nature which we inherit to future generations  
(Note: Temptations and promises of the uranium mining industry never meet the demands of a growing jobless workforce. Even without strikes which influence an economy negatively, as RSA now, normal economic crises cause retrenchment any time and bring whole families into ruin. Strikes are always to be foreseen in countries with low job creation and high population growth. Does Namibia like to become a mining/mine worker dependent country like RSA?)

Furthermore, cancer and fatal cases due to ionising radiation in the region increase. Biodiversity decreases. Surface water of flowing rivers contaminate sand pits of building industry, and brings uranium into the houses which then become a permanent radioactive source for the inhabitants.  
(Note: Constant monitoring by state's radiological officials must be established now)

Air quality decreases, and poisons when strong winds blow uranium salts/particles over the the whole Namib.

(Note: Desert storms carry the fine dust over hundreds of kilometers and

.../3

-3-

pollute the desert surface)

High influx of job seekers to the coast makes living condition of illegal settlers worse who are present since the uranium industry came to the region (socio-economic impacts), and are a permanent source of many unlawfull activities.

In conclusion, we are busy to sell our nature which we are commissioned to preserve. No job, once terminated, and no money or revenue income can give us back our health and life. The uranium industry is a thread to us all.

Do we have to witness at first a catastrophic nuclear power station deaaster at the East coast of USA, before we turn away from uranium as energy source? Solar and wind power is a save, environmental friendly, sustainable, reliable alternative to nuclear power, and uranium exploration as well.

**SOCIAL AND ENVIRONMENTAL IMPACT ASSESSMENT  
FOR THE MINING OF THE Z20 URANIUM DEPOSIT**

HOW TO RESPOND	
Responses to this document can be submitted by means of the attached comments sheet, through communication with the contact person listed below or through input at the public meetings/open day. All SEIA documents will be available on the Aurecon (Pty) Ltd (Aurecon) website (www.aurecongroup.com) follow the public participation link).	
If you would like your comments to be addressed in the scoping report please submit them by <b>31 October 2012</b> .	
WHO TO CONTACT	
<b>AURECON</b> Contact person: Ilze Rautenbach Tel: +264 61 297 7011 Fax: +264 61 279 7007 Email: ilze.Rautenbach@aurecongroup.com	<b>SLR</b> Contact person: Werner Petrick Tel: +264 (0) 64 402 317 Fax: +264 (0) 64 403 327 E-mail: wpetrick@slrconsulting.com

**Background Information Document  
Response Form for comment by Interested and Affected Parties**

TITLE	DR	FIRST NAME	GABI
INITIALS	IC	SURNAME	SCHNEIDER
ORGANISATION	GSN/IMME	EMAIL	gschneidw@imme.gsn.na
POSTAL ADDRESS	71806 13297 WINDHOEK	POSTAL CODE	
TEL NO.	061-2848242	FAX NO.	061-294144
CELL NO.	081-2949950		

Please list any colleagues/ friends or organisations that you feel should also be registered as an IAP for this SEIA (with contact details if available):

NAME AND ORGANISATION	POSTAL/ EMAIL ADDRESS	TEL NO.	FAX NO.

Please comment on any issues or concerns you may have:

(Please use a separate sheet if you wish)

According to the SETA and SETAP which we have conducted, infrastructure corridors should be used rather than any more having their own infrastructure on it - crossing the desert I didn't see any mention of co-operation with Herab, which must be considered in today's newspaper a report says that there will be even 2 (2) bridges over the Khoub River. This is unacceptable and unworkable.

Thank you for your comments