



Memo

To: **NEMAI Consultants**

From: **Jan Viljoen**

Date: **June 17, 2010**

Re: **Draft scoping report, Mokolo and Crocodile River (west) Water Augmentation Project(Phase 1 and 2)**

The following comments on the abovementioned report, dated November 2009, with respect to the Phase 2 document

- ¹ On page 22 details are given on flushing the inlet to the pumps. Your document fails to indicate the environmental consequences of this process with respect to aquatic life discharging plumes of silt into the water system
- 2 Page 23 describes the desilting works. The document does not reflect the disposal of the silt been collected and how it is going to be disposed This effects environment
- 3 On page 26 with respect to the balancing reservoir, the same comment as in 3 applies
- 4 On page 72, it is recognised that the international agreements and obligations are in place. This document does not at all reflect the consultants addressing these arrangements and involving the directly affected countries by means of participation as affected parties. Not consulting these parties is a major flaw in the process and will cause conflict between the different states affected.
- 5 On page 81 the statement is made that the water is heavily contaminated with organic pollution and is caused by return flows from agriculture. I object to this statement that agriculture is the main cause of pollution. In the pre-amble of this section it describes the sources of effluent from sewage works into the system. It is common knowledge that most of these plants are not operating effectively, and hence being the major contributor of organic pollution.
- 6 This section in addition fails to describe how water quality is going to be controlled, to ensure that ground and surface water is not been polluted by the increase water flow been augmented from sewage plants in the Gauteng area. This is one of the prime concerns of the agriculture sector, as it not only

effects health but the production of food , especially for the export market which must satisfy Eurogab requirements

- 7 On page 86, the consultant fails to recognise the impact of polluted water been discharged, will have on groundwater and must be included in the study. The statement made that further investigations are required with respect to the use of groundwater, will be resisted by the agriculture sector. If this source is over exploited, it will result that the total game and cattle industry needs to be abandoned, with the consequential job losses.
- 8 Page 96 reflects the possible impacts to be addressed by the socio – economic impact. To be added is the potential increase in theft and farm attacks during the construction phase. As already indicated in previous meetings, this study must clearly reflect the impact on profitability of farming operations due to the decrease in water available for irrigation, the effect on employment of unskilled and semi skilled employees and on food security.. This requirement is amplified on page 101 with respect to agriculture, but is not limited to the Magol Dam, but also to include the Crocodile and Limpopo rivers
- 9 Under visual impacts page 110, it is critical that each borrow pit been established, is accompanied by an environmental impact assessment, to ensure that rehabilitation requirements are site specific. With respect to the excavated material, considering a bulking factor of 20%, will the excess material be 5,4cubic meters per linear metre of trenching. The permanent storage of this material(which will be substantial) will require detailed rehabilitation plans and must be accompanied with a site specific environmental plan

With respect to the Phase 1 project (Magol river) the comments on the document is similar as to those applicable to the Phase 2 project , as commented on above.

The comments submitted are submitted with the understanding that it will not prejudice input to be provided in the final environmental report, which is to follow.