



**ENVIRONMENTAL & SOCIAL CONSULTANTS**

P.O. BOX 1673  
SUNNINGHILL  
2157

147 Bram Fischer Drive  
FERNDALE  
2194

Phone: (011) 781 1730  
Fax: (011) 781 1731  
Email: salomonp@nemai.co.za

**MOKOLO AND CROCODILE RIVER (WEST) WATER AUGMENTATION PROJECT  
(MCWAP):**

Phase 1,2, De-bottling and all other related development  
DEAT Ref. No. 12/12/20/1465

**COMMENT SHEET**  
**Review of draft Scoping Report**

*(Complete and return by 11 December 2009 to Salomon Pienaar)*

<b>Date:</b>	11 December 2009	
<b>Location where report was reviewed:</b>	Copy provided to Department of Agriculture	
<b>Name of organisation: (if applicable)</b>	Department of Agriculture: Waterberg District, Manager Engineering and Natural Resource Management	
<b>Name &amp; Surname:</b>	Charles De Kock	
<b>Address</b>	<b>Postal:</b>	<b>Physical:</b>
	Department of Agriculture, P O Box 1048, MODIMOLLE 0510	NTK Building Department of Agriculture, Cnr. Thabo Mbeki and Rivier str. MODIMOLLE 0510
<b>Tel No:</b>	(014) 717 4949	
<b>Cell No</b>	082 788 3316	
<b>Fax No:</b>	(014) 717 3500	
<b>Email:</b>	dekockceq@agric.limpopo.gov.za	

<b>Official use</b>
<b>Date received:</b>
<b>Our reference:</b>
<b>Status</b>

**Comments:** (note - additional pages may be included if the space provided is insufficient)

### **1. Total Impact of proposed MCWAP development**

- I am not convinced through the content of the Scoping reports for all the development phases, the Public Participation involvement and meetings or correspondence, that the Interested and Affected parties are made aware of the total impact, and total possible impact, this first stage of transforming the mentioned MCWAP area, could have in the long run. Too little information, guidelines and statistics are found that explains the effect of industrialising a agricultural area.

### **2. Development MUST take place within Terms of Reference (TOR)**

- It should be clearly understood that the proposed development MUST take place within very clear and definite agreed upon Terms of Reference with and between all Interested and Affected parties. I dare to add that in general I should think that more Interested and Affected parties are in favour of the proposed development on condition that it takes place within definite and clearly outlined guidelines.
- Furthermore, breaching the above mentioned TOR by any party should be addressed in a manner suitable and agreed upon by the Interested and Affected parties. Clear compensation and remuneration must be agreed to prior to any works to commence. I suggest that Interested and Affected parties should be advised and briefed thoroughly on this issue that most probably could occur.

### **3. Assurance of Water Quality**

- In many, if not all the Public Participation meetings I have attended, it was noted that serious concerns are raised with regards to the water quality that will be introduced in rivers and the possible detrimental effect that it will have. Again I repeat that it is the manner in which the proposed development will affect the surrounding area that is of concern.
- I suggest that assurance is provided and supported (backed up) by an agreed upon compensation strategy that will be activated with immediate effect as soon as water quality specifications are found to deviate from agreed norms. Interested and Affected parties should be informed on various compensation strategies that could be tabled and negotiated.

### **4. Assurance of Water Quantity**

- I am sure that Nemai has received enough feedback and comment on this issue. I trust that you take the matter seriously.
- I strongly suggest that a Specialised Study be conducted that would address the inconsistent discussions, reports, tables, graphs, modelling and projections posed and discussed at most of the Public Participation meetings. This study by an independent Specialist Hydrologist should investigate the total cycle that water follows within the proposed development – including return flows.

### **5. Feeding the population of RSA**

- Whether we like it or not – Agriculture was, is and is supposed to continue feeding the population of this country. I am majorly concerned that large type Industries are receiving undeserved and tunnel type attention. It must be understood that a Natural Resource has a certain limited ability / potential. Should development take place without considering the limitations / potentials of water as a natural resource, we as a country will in future pay dearly for our mistakes. I humbly request to every reader of this document NOT to loose sight of the fact that we are primarily fed and nourished from our existent natural resources – please let us protect what is entrusted to us.

### **6. Nemai to assure that concerns are addressed**

- I am concerned that the reports and matters raised by the Interested and Affected parties during so many of the Public Participation and Information sessions are merely noted by Nemai as a formality. I am also well aware that serious differences do exist and that all matters should be balanced carefully. I request that matters beyond your (Nemai) jurisdiction, be listed and presented to all Interested and Affected parties in advance. This will ensure that expectations are not created when matters are raised and not satisfactory dealt with.

### **7. Transparent futuristic planning**

- I kindly call upon the integrity of the Nemai team to be totally transparent towards all Interested and Affected members by making known the total futuristic planning and development that could take place due to the MCWAP.

### **8. Cost of water: Agricultural use vs Industrial use**

- It is sincerely hoped that a new type pricing structure that will somehow contribute towards the compensation of the Interested and Affected parties who could be facing water limitations would be negotiated and agreed upon.