

Table 1: (Continued).

Comment made by:	Issue	Response
Verbal comments made at the Usakos Public Meeting on 27 May 1997 (Continued)	<i>Alternatives</i>	
	<ul style="list-style-type: none"> Can't Rössing use sea water instead of Khan ground water 	<ul style="list-style-type: none"> Too expensive to desalinate (Chapter 4)
	<i>Process</i>	
	<ul style="list-style-type: none"> Concern about information overload Full E.I.A. Report made available late E.I.A. focuses only on Rössing's needs Project details seem to be changing all the time 	<ul style="list-style-type: none"> Large amounts of information are simplified Executive Summary has been re-written and broadened Scope of document widened (Chapter 4) Addressed in Appendix 1.
	<i>Need and Desirability</i>	
<ul style="list-style-type: none"> Reasons for decline in water consumption by Rössing Financial benefit to Rössing ? Has aquifer recharge proven itself elsewhere Can the scheme not be constructed above Usakos to benefit the residents of Usakos 	<ul style="list-style-type: none"> Addressed in Chapter 4 Yes. Yes. Israel and Namibia. Not feasible as ground water would take too long to reach Rössing 	
<i>Construction</i>		
<ul style="list-style-type: none"> Clarification on dam and spillway construction Greater clarification on use of concrete 	<ul style="list-style-type: none"> Addressed in Chapter 5 Addressed in Chapter 5 	
<i>Pollution studies</i>		
<ul style="list-style-type: none"> CSIR isotope studies may not reflect "past pollution" Independent checks of pollution monitoring boreholes ? Will Rössing continue to monitor boreholes ? Constitutional right to a clean environment 	<ul style="list-style-type: none"> Addressed in Appendix 4 No. Yes. Addressed in Chapter 4 	
Verbal comments made at the Arandis Public Meeting on 28 May 1997	<ul style="list-style-type: none"> Will there be a right of appeal if the KARS Project goes ahead ? How can farmers address claims for any damages ? 	<ul style="list-style-type: none"> The final decision lies with Namibian Government Departments. They will hear public appeals. Rössing has publicly stated that, if the KARS Project proceeds, they will address claims for compensation

Table 1: (Continued).

Comment made by:	Issue	Response
Verbal comments made at the Swakopmund Public Meeting on 29 May 1997	<i>Comments by Rössing General Manager</i>	
	<ul style="list-style-type: none"> Rössing committed to process of consultation and will abide by outcome of E.I.A. process KARS Project will help to reduce reliance on freshwater sources Rössing undertakes to carry out mitigation required and/or compensate for damages if incurred Rössing will not proceed with KARS Project if not economically viable Rössing is fully committed to the desalination project 	<ul style="list-style-type: none"> These comments have been brought into the text of the E.I.A. report in several places, especially in Chapter 1
Written comments by Mrs Courtney-Clarke on behalf of Swakopmund Town Council	<ul style="list-style-type: none"> Rise in TDS and drop in water levels are considered a "fatal flaw" Sand dune encroachment not dealt with in sufficient detail Khan River sediment contribution is important Sand for sand mining is brought down by floods - CSIR's explanation is not plausible Inadequate consultation with local land-owners Desalination project must be considered Scepticism around the modelling process and findings Lack of firm evidence is criticized 	<ul style="list-style-type: none"> Improved modelling results confirm TDS rise and water level drop. Now placed in broader context (Chapter 4) More detail in Chapters 4 & 5 More detail and firmer evidence in Chapter 4 & 5 Clearer evidence in Chapters 4 & 5. Sand from river bed is eroded from upstream and deposited in sand-mining pits Additional consultations held with farmers (Appendix 2) Dealt with in Chapter 1 KARS Working Group satisfied with modelling approach Greater clarity given and firmer statements made (Chapter 4, 5, 6 and Executive Summary)
Written comments by Dr H. Halenka	<ul style="list-style-type: none"> Storage of water in sand is supported "Prediction" is unacceptable Recharge scheme will improve ground water quality Medium and heavy flows will scour sand from river bed and help to replenish beaches 	<ul style="list-style-type: none"> Chapter 1. "Predictions" derived from modelling approaches are a recognized technique when dealing with inadequate data sets. KARS Working group satisfied with approach. Chapters 1, 4 & 5 Agreed. Chapters 4 & 5.

Table 1: (Continued).

Comment made by:	Issue	Response
Written comments by Mr Lorenz Hesse	<ul style="list-style-type: none"> Predicted drop in water table could be disastrous for local farmers No reference to crop tolerance levels of rising TDS / salinity Emphasis on effects of Von Bach & Swakoppoort dams is misleading to the small farmers 	<ul style="list-style-type: none"> Addressed more fully in Chapters 4, 5 and 6, and Appendix 2. Addressed in Appendix 2. These two dams are clearly responsible for the major part of effects currently experienced. They have to be emphasized. Chapters, 4, 5 & 6 plus Executive Summary.
Comments by Mr Tom Ryan	<ul style="list-style-type: none"> Criticized tentative language of E.I.A. Report Who studied effects of tailings dams and when Assess desalination as alternative Why will Rössing's water demand will increase and will this affect the life of the mine Conclusions, recommendation and matrix are "meaningless" Further information on experimental sand walls built earlier by Rössing Challenged conclusion on dam failure effects Challenged consultative process Wide-ranging comments on Rio Tinto activities overseas 	<ul style="list-style-type: none"> Language improved and firmer conclusions drawn Inappropriate to KARS Study. Dealt with in Chapter 1 Rössing's water demand increase is due to planned increases in production. Will not change current estimates of life of mine (Chapter 1). Improved in Final Report; matrix removed Inappropriate to KARS Study Effects of dam failure re-written - conclusions remain the same Process explained by facilitator Inappropriate to KARS Study
Comments by Mr Piet Hamman	<ul style="list-style-type: none"> Water quality in lower Swakop was always poor Current water use is outside Government's recommended levels Generally, water quality not fit for farming activities Increased TDS due to KARS Project is very small Floods improve water quality; wells in centre of river not feasible Current situation should be studied rather than historical data 	<ul style="list-style-type: none"> Agreed. Chapters 4 & 5. Agreed. Appendix 2. Agreed. Yet, farming continues and crops are raised (Appendix 2) Agreed. Chapters 4 & 5. Agreed. Chapters 4 & 5. Only "recent" data are simulated by modelling. Chapters 4 & 5.

Table 1: (Continued).

Comment made by:	Issue	Response
Comments from the floor	<p><i>Regarding dam wall and recharge scheme</i></p> <ul style="list-style-type: none"> Will the "retarders" stop or slow down the ground water flow ? Will the "retarders" be removed during decommissioning ? Did Rössing extend its mining grant to cover the KARS site ? Will water be extracted from the dam of from boreholes ? Has the new water abstraction permit been negotiated yet ? What are the new parameters for the abstraction permit ? Is the decommissioning plan bound to a specific time frame ? Who guarantees that decommissioning will be done once Rössing has left ? Can the dam be built to allow normal flows in the Khan River ? Can sediments be released from the dam ? <p><i>Regarding data used</i></p> <ul style="list-style-type: none"> Why are there no flood records for the Khan River after 1980 ? Did a former Rössing employee collect the TDS and uranium data ? <p><i>Regarding agricultural impacts</i></p> <ul style="list-style-type: none"> How many farmers were approached for information ? Who carried out the TDS measurements for the CSIR ? Will farmers' increased maintenance costs be compensated ? Will increased TDS levels affect livestock ? Who guarantees that compensation will be paid if Rössing is no longer around ? Why wasn't more TDS sampling done when project was first conceptualized ? 	<ul style="list-style-type: none"> Will slow and reduce water flow (Chapter 5 and Appendix 7). Yes. Yes. Addressed in Chapter 1. From boreholes. Chapter 1. No. Only if KARS Project is approved. Unknown until negotiations start, if KARS project approved No. Rössing's compliance with Namibian legislation. Not possible (Chapter 1). Not possible with current structure (Chapter 1). Rectified with new data (Chapters 4 & 5). Inappropriate to KARS Study. Initially 15 farmers approached. Later, a second group of 6 farmers consulted. (Appendix 2). CSIR laboratories. Yes, if they are due to the KARS Project. KARS effect is expected to be about 15 % increase. This could affect some livestock. Namibian mining legislation. Routine sampling for ground water quality is the responsibility of the Department of water Affairs, particularly if the project had not been designed or implemented.

Table 1: (Continued).

Comment made by:	Issue	Response
Comments from the floor	<i>Regarding dune movement</i> <ul style="list-style-type: none"> At Km 3 there is dune movement to the north (east). Dune movement is visible to the layman at the Road Bridge and over the Walvis Bay road. 	<ul style="list-style-type: none"> Agreed. Chapter 4 & Appendix 6. Wind-blown sand is visible at these sites. None of the large dunes have encroached on these sites (Chapters 4 and 5, and Appendix 6).
	<i>Regarding beach sand replenishment</i> <ul style="list-style-type: none"> The influence of the breakwater needs to be considered Results of earlier CSIR studies conflict with the present results 	<ul style="list-style-type: none"> Agreed. (Appendix 6). Section re-written and confirmed by authors of earlier CSIR studies (Appendix 6).
	<i>Regarding tourism</i> <ul style="list-style-type: none"> The Khan River is an important tourist route - impact needs to be dealt with more comprehensively 	<ul style="list-style-type: none"> Agreed that Khan River is important to some tourists and operators. Chapter 4.
	<i>Regarding economics</i> <ul style="list-style-type: none"> Has a full economic appraisal been carried out of all costs and benefits What will be the cost to Rössing of water from KARS and the desalination plant ? Will costs of desalinated water to Swakopmund residents be affected by reduced demand on freshwater sources ? 	<ul style="list-style-type: none"> Yes, in the engineering studies. Rössing will benefit financially by abstracting ground water from the Khan River. This will be cheaper than desalinated water, but will NOT replace desalinated water required in future. Costs to Swakopmund residents will be reduced slightly by extra availability of freshwater and the delay in having to implement the desalination scheme.
Comments from the floor	<i>Regarding the E.I.A. process</i> <ul style="list-style-type: none"> Many future actions depend on the proposed Environmental Management Plan. When will this be developed ? Alternative sources should be considered before natural resources are exploited Effects on the Municipality need also to be considered Concern that engineering and economic feasibility studies not completed before E.I.A. study Is KARS Scheme reason that Namibian Water Bill not passed ? Have relevant ministries responded 	<ul style="list-style-type: none"> The Environmental Management Plan will only be developed if the KARS Scheme is approved. Government policy is to strive for sustainable use of natural resources Agreed. Chapters 4 and 6. Results of E.I.A. Study needed for economic study. No knowledge of this. Yes. See later section of this Table.

Table 1: (Continued).

Comment made by:	Issue	Response
Written comments by Mr F.F. Lange	<ul style="list-style-type: none"> Too many vague expressions Sand dunes do move across the river and the road 	<ul style="list-style-type: none"> Re-written to improve expressions. Wind-blown dust and sand crosses the road and at Km 3. The major dune structures are stationary (Chapter 4 and Appendix 6).
Written comments by Mr H. Dichtl	<ul style="list-style-type: none"> Can sluice gates be built into the dam wall ? Can sediments be released ? Has the anticipated shortfall in water to the Swakop River farmers been addressed ? 	<ul style="list-style-type: none"> This is not possible with the proposed dam structure (Chapter 1). Not possible with dam structure. Yes, both quantity and quality of water (Chapter 4 and Appendix 1).
Comments by KARS Working Group members (13 June 1997)	<i>General</i> <ul style="list-style-type: none"> Conclusions drawn were not always supported by the evidence. Not scientific enough (E. Miller). Criticised tendency in report to "point fingers" at other culprits as misleading (E. Demasius). 	<ul style="list-style-type: none"> Sections of report re-written with firmer conclusions (Chapters 4, 5, 6 & 7; Executive Summary). Re-written to demonstrate reasons for existing and imminent conditions in the lower Swakop River (Chapters 4, 5, 6 & 7; Executive Summary).
	<i>Water quality</i> <ul style="list-style-type: none"> Report under-estimates effects of downstream farmers (L. Hesse). Concerned that 1985 flood data omitted (L. Hesse). KARS Project could be last straw that "broke the camel's back" (L. Hesse). Longer residence time of ground water would lead to greater mineralization (E. Miller). Lower water table could improve the recharge potential (P. Hamman). Increased salinization could lead to farmers having to install expensive drip irrigation (L. Hesse). Threat to lower Swakop River farmers is a "fatal flaw" in the project (E. Demasius). Khan River usually floods well before (and longer than) the Swakop River (E. Demasius). Flow "retarders" would reduce the base flow (E. Demasius). Conductivity measurements should be taken now at each farmers well and/or borehole (P. Hamman). 	<ul style="list-style-type: none"> Agreed. Addressed in Chapters 4 & 5, plus Executive Summary. Simulated data up to 1995 now included. (Chapter 4, Appendix 1). Precisely why the incremental effects on top of the existing situation have been carefully determined (Chapter 4). Yes, if evaporation and evapotranspiration still continue. Agreed, if floods still arrive. Agreed. BUT, Appendix 2 suggests very strongly that this strategy should be used already. More emphasis given. (Chapter 4 and Appendix 2). Agreed. Local observations confirm the importance of the Khan River, especially since construction of dams on the Swakop River (Chapter 4). Yes, to agreed limits. (Chapter 5). Agreed. This should be undertaken anyway, regardless if the KARS Project proceeds or not.

Table 1: (Continued).

Comment made by:	Issue	Response
Comments by KARS Working Group members (13 June 1997) (Continued)	<i>Water quality (Continued)</i> <ul style="list-style-type: none"> Quality and quantity of water should be considered with depth at each site (E. Miller). 	<ul style="list-style-type: none"> Agreed. This has been achieved wherever possible in Chapters 4 & 5, and Appendix 1; also Executive Summary.
	<i>Aeolian and marine sand transport</i> <ul style="list-style-type: none"> Need more visual evidence of sand depletion phases on beaches (E. Demasius). E.I.A. Report downplays role of sediments discharged by rivers to beaches Comment requested on rumour that a Rio Tinto company plans to initiate a huge new development at Walvis Bay 	<ul style="list-style-type: none"> Dealt with more comprehensively in the report (Chapter 4; Appendix 6). Dealt with more comprehensively in the report (Chapter 4; Appendix 6). Written answer obtained from Mr W. Haymann (Rössing General Manager) that this did not involve a Rio Tinto company and that development plans were tentative.
Written comments from Mr Peter Tarr, M.E.T.	<ul style="list-style-type: none"> Report is apparently contradictory as to the possible benefits that the KARS Project will have for alluvial aquifer water supplies in the West Coast Area. The real benefits of the KARS Scheme are not clearly spelt out. Rössing could have initiated the E.I.A. process at an earlier stage to allow more time for the study. Disappointing that little evidence was provided on the origin of the sediments (geological formation, geographical area). Is the sand on Swakopmund beaches similar to that on beaches at Sandwich Harbour? Where will the decomposed gneiss for construction of the dam wall be obtained? Will this area be rehabilitated? The sand dunes between Swakopmund and Walvis bay are not stationary. 	<ul style="list-style-type: none"> Inconsistencies removed and errors corrected in Chapters 4 & 5, as well as Executive Summary Many of the full benefits will only be quantifiable once the final economic analysis has been completed. Changes made to Chapters 1, 4, 5 & 6, plus Executive Summary. In retrospect, yes. Nevertheless, the study and the E.I.A. process were successful in providing information to all interested and affected parties. This is not as simple as it might appear as many of the component particles are similar in the different geological formations. Was not addressed in the study. This aspect was not addressed in the study. CSIR Coastal Engineers are of the opinion that the sand at Swakopmund is derived from a wide variety of sources. Full details in Chapters 1 and 4. Yes. Details in Chapter 4. Main dunes are stationary, whilst loose wind-blown dune sand is blown across the Swakop River.

Table 1: (Continued).

Comment made by:	Issue	Response
Written comments by Mr Peter Tarr, M.E.T. (Continued)	<ul style="list-style-type: none"> Why is the irrigation agriculture issue not dealt with in more detail relative to its local importance. Will the irrigation agriculture issue be dealt with in more detail in the Environmental Management Plan? What will happen when 20 years worth of accumulated silt are able to be eroded when the KARS Dam is decommissioned? The report is not flawed, provided that Rössing develop an appropriate Environmental Management Plan. 	<ul style="list-style-type: none"> This issue has received considerable attention. Chapters 4 & 5, as well as Appendix 2. If the KARS Project proceeds, an Environmental Management Plan will be developed. This would definitely include more detail on the irrigation issues. Professional judgement suggests that each flood will scour out some of the accumulated silt and transport this downstream. The quantities involved will depend on the size of the flood. An Environmental Management Plan will only be developed if the KARS Project is approved.
Written comments by Dr Mary Seely, DRFN	<ul style="list-style-type: none"> Greater attention could have been given to making the report more concise. Report could have been improved by the inclusion of more information on the relationships between the Khan and Swakop River contributions to flow and sediment transport. A total of 74 detailed comments or queries or suggestions for improvement have been made on specific portions of the report. 	<ul style="list-style-type: none"> Chapters 1, 2, 4 and 5 have been re-written to eliminate superfluous information and have been re-ordered to include new information. This has been done in Chapters 4 & 5, as well as in the Executive Summary and in Appendix 1. All 74 comments have been attended to individually. In many cases, entire sections have been re-written, in others, short explanatory sections have been inserted for greater clarity. All Chapters and Executive Summary.
Written comments by Rössing Uranium Limited	<ul style="list-style-type: none"> A total of 42 specific detailed comments and suggestions for improvement were made. The analysis of available data and modelling results should receive more prominence in the text. Confirm that all possible data sources have been exhausted 	<ul style="list-style-type: none"> All 42 suggestions and comments were dealt with individually in the specific sections referred to. This has been done in Chapters 4 & 5, as well as in Appendix 1. We can confirm that all possible sources of measured and modelled data were used.
Written comments from Rio Tinto London	<ul style="list-style-type: none"> A total of 15 specific comments and suggestions for improvement were made for identified sections of the report. 	<ul style="list-style-type: none"> All 15 comments and suggestions have been incorporated into the text in the appropriate places.

Table 1: (Continued).

Comment made by:	Issue	Response
Written comment from the Department of Water Affairs	<ul style="list-style-type: none"> The Department made 9 specific comments related to different sections of the report. 	<ul style="list-style-type: none"> The suggestions or queries contained in each of the 9 comments have been incorporated into the text and appendices of the Final Report.
Published press articles on the KARS Project and the E.I.A. process	<ul style="list-style-type: none"> A wide variety of newspaper articles have appeared in the Namibian press. These articles contain a variety of factual and conjectural information about the KARS Project and Rössing Uranium. 	<ul style="list-style-type: none"> Several sections of the E.I.A. Report have been re-written to provide a clearer description of the project options and the expected benefits to Rössing and the West Coast area of Namibia. Several of the points raised or allegations made could not be dealt with.