COMMENTS AND RESPONSE REPORT

Record of consultation

Date	Description	Abbreviation
31 July 2014	SEIA Focus Group Meeting – Key Stakeholders	M1
31 July 2014	SEIA Focus Group Meeting – MUN	M2
31 July 2014	SEIA Focus Group Meeting – Media	M3
31 Jul 2014	SEIA - Public Meeting	M4
7 August 2014	SEIA Authorities Meeting – NamWater	M5
7 August 2014	SEIA Authorities Meeting – MAWF (Department Water Environment)	M6
3 August 2014	Comment sheet – G. Noci (Mile 4 resident)	C1
25 August 2014	Comment sheet – Hans-Dieter Göthje for Kallisto Tours and Services	C2
1 August 2014	B. Seefeldt	C3
28 July 2014	D. Garbers	C4
23 September 2014	B. Seefeldt	C5
27 July 2014	Email from Riana Scholtz	E1
24 July 2014	Email from Kahijoro Kahuure	E2
5 August 2014	Email from Sandra Muller	E3
1 December 2014	Email from Philip Hooks	E4
1 December 2014	Email from Andre Brummer	E5
9 January 2015	Letter from Ministry of Environment and Tourism (response regarding Scoping Report)	L1
21 January 2015	Email from Anja Kriener	E6

Abb.	COMMENTS	RESPONSE	
Technica	Technical & general		
M1	Have Rössing thought of letting the salt works use their discharged brine in	This option was considered but is not part of the project design. The chemicals	
	their operations?	used in the desalination process determine the output content of the brine	
M4	The use of brine at the salt works was considered during the Areva	and therefore influence the suitability of such an option. This is not currently	
	desalination plant planning. Is this being considered for the Rössing	part of the project but may be investigated later.	
	desalination plant?		
M5	Will discharge of brine to the salt works be an option?		
C3	The private property owner can process the brine if no chemicals are added		
	during the sea water desalination in Rössing's plant.		
M1	How does Rössing plan to keep the biological growth from the filters?	Refer to section 3.5.2 of the SEIA Report: Chlorine gas may be used to	
		eliminate biological contaminants in the feed water and reduce biological	
		growth in the pipes and pumps of the desalination plant and various holding	
		tanks. The preferred process will not use continuous application of chlorine	
		because of the bio-flocculation process (part of the ProGreen™ system) relies	
		on biological action and would be destroyed by a biocide. However, shock	
		doses of chlorine, i.e. 10mg/l for 10mins may be introduced infrequently at	
		certain points for controlling bio-growth (e.g. at media filters, and at a	
		maximum frequency of about 6 times a day or every 4 hrs of operation).	
M1	Once the water is added into the NamWater existing line what is the quality of	Refer to section 3.5.5 of the SEIA Report: The plant will produce drinking water	
	the water.	quality (mixture of Class A and Class B according to the Namibian drinking	
M5	What will the quality of the desalinated water be?	water standards) to the same specification as the Areva desalinated water.	
C5	One of the responses given to IAP questions was "The plant will produce	i. The water supplied by NamWater is derived from the Omdel.	
	drinking water quality – a mixture of A and class B (with desalination water) –	However since the end of 2013, the water supply was augmented by	

Abb.	COMM	ENTS	RESPO	NSE
	to the	same specification as AREVA water ."		desalinated water from the Areva plant due to the high coastal water
	i.	Does this mean that the feed to NamWater's main line is not		demand, for use by Rössing and other relevant mines (Refer to section
		desalinated water ?		3.2).
	ii.	Do the experts of the Project foresee a corrosion in the waterpipe by	ii.	Refer to section 3.5.5 and Table 03: The desalinated water will be fully
		desalinated (pure) water , and an unhealthy condition when not		pH corrected, re-mineralised (using soda ash and calcium) and
		blended with water containing salts?		chlorinated to the relevant potable water standards. The desalinated
	iii.	Talking about water quality standards of the country the high		water will not increase corrosion risk to the pipeline.
		concentration of alkali , salts , and others can only be regarded to so	iii.	Cannot comment on behalf of NamWater.
		called class A and B water by DWA , because Namibia adheres still to	iv.	Noted.
		an old legislation (RSA) with an out dated regulation from 1989 ,	v.	Refer to section 3.5.5: Product water produced by the desalination
		adopted by the interim government .The truth is that NamWater's		process will be pumped via a new 400mm diameter pipeline (steel,
		drink water, actually a salt solution is not fit for human consumption		ductile iron and GRP piping are being considered) to intersect with the
		since the main source (Omdel) has been overloaded , and is now		existing 700mm diameter NamWater pipeline that runs alongside the
		depleted . The sale of (mineral) waters in supermarkets at the coast		C34, approximately 850m to the east of the site. The waters that the
		speaks for itself.		NamWater pipeline carries (a mix of Omdel and Areva water) will be
	iv.	To my understanding the advantage of using the purified solvent to		mixed with Rössing remineralised desalinated water in the transfer
		its full extent by diluting NamWater's unhealthy Aqueous solution is		pipeline and not before.
		not realised .	vi.	Cannot comment on behalf of others.
	v.	My request is that the outlet water of the plant does not become		
		mixed with NamWater's water before feeded into their main line.		
	vi.	In my lifetime I did not experience any cation traces in de-ionised		
		water stored in stainless steel of polyethylene tanks .The RO3 Water		
		Swakopmund branch sells everyday reverse osmosis water in		

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		coloured plastic containers to the public for human consumption.	
		Their product has a TDS of $10 - 20$ mg/L which is the outlet of the	
		plant while the feed water (town) has 600 – 1200 mg/L. Without	
		oxygen and carbon dioxide ordinary metal are resistant in pure water.	
		The reaction of dissolution of the metal begins with an oxidation, and	
		not by hydration .Plastic material cannot dissolve in pure water. Only	
		one of 10 000 000 water molecules dissociated.	
M1		Can the plant be expanded so that other mines can make use of this?	This does not form part of the scope of this project. The plant will be designed
M3		Can this plant be expanded?	to deliver 3 million m3 of desalinated water to only cater for Rössing's
			requirements. (Refer to section 3.3 of the SEIA Report for more details
			regarding the project description):
M1		Where are you in the design phase?	The design phase has not commenced since an environmental clearance
			certificate needs to be obtained first. The project is at bankable feasibility
			study level at the end of November 2014.
M1		What is the project timeline?	The final SEIA Report will be submitted to MET towards the end of January
M2		How long will it take to complete the construction of the plant and what will	2015. Assuming a review period of 3 months and MET approving the SEIA,
		the overall costs be for constructing the plant?	construction could commence towards end of April. Construction will take up
M3	&	What will the cost of the facility be?	to 18 months to complete.
С3			The entire cost would range from N\$180 million and N\$220 Million.
M3		How long will construction take after approval?	(Refer to section 3.3 of the SEIA Report for more details regarding the schedule
M5		When will the project be implemented? i.e. when will the first drop of water	and section 7.4 for costs).
		be supplied?	
M6		How much will be spent on the plant?	

Abb.	COMMENTS	RESPONSE
M1	What will happen to this plant if Rössing shuts down?	Refer to section 3.3 of the SEIA Report: The plant will be designed to have a 10
M3	What is the lifespan of the plant and what happens after that?	year operational life, which ties in with the current Rössing Uranium Life of
M4	What is the design life of the plant?	Mine plan. At the end of the design life period, the plant may be refurbished
		for continued operation, or may be decommissioned, broken down and the
		site rehabilitated, or sold as a going concern to another mining house or
		NamWater, depending on the situation and needs at that time.
M1	Will the development of this plant hamper NamWater's plans for their own	NamWater planned to construct a desalination plant at Mile 6. Cannot
	project?	comment on behalf of NamWater.
M1	Will chlorine gas be used to treat the water? What will this impact be?	Refer to section 3.5.2 of the SEIA Report: Chlorine gas may be used to
		eliminate biological contaminants in the feed water and reduce biological
		growth in the pipes and pumps of the desalination plant and various holding
		tanks. The preferred process will not use continuous application of chlorine
		because of the bio-flocculation process (part of the Progreen™ system) relies
		on biological action and would be destroyed by a biocide. However, shock
		doses of chlorine, i.e. 10mg/l for 10mins may be introduced infrequently at
		certain points for controlling bio-growth (e.g. at media filters, and at a
		maximum frequency of about 6 times a day or every 4 hrs of operation). The
		concentration of chlorine in the brine water discharges is expected to be low
		and within relevant standards due to the application of sodium
		metabisulphate.
M2	What is the distance between Rössing (mine) and the proposed desalination	See Figure 7 of the SEIA Report: The location of the proposed plant in relation
	plant? Once the water is in the pipeline is it NamWater's responsibility?	to the Rössing mine is approximately 50 km from the Rössing mine.
		The desalinated water will be transported to the mine through the existing

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		NamWater pipeline, who owns and operates this infrastructure. They will
		remain the responsible party for the maintenance of the pipeline. (Refer to
		section 3.5.5 of the SEIA Report).
C3	Using NamWater's water transport system means relaying on an old water	The desalinated water will be transported to the mine through the existing
	pipeline which can anytime burst.	NamWater pipeline (who owns and operates this infrastructure). They will
		remain the responsible party for the maintenance of the pipeline.
M2	If the facility takes in 3 million m ³ of water what volumes will be discharged as	The proposed desalination plant can produce up to 10,000m ³ /d of potable
	brine back into the sea?	water in every 24 hour cycle. Water production times and rates will vary
		depending on demand at the mine, peak and offpeak electrical demand
		periods (and associated electrical rates), routine maintenance shutdowns,
		breakdowns and upset conditions (i.e. ocean storms or red tide conditions).
		The production rate for the plant should however average at 8,200m ³ /d or
		approximately 3Mm ³ per annum. At peak production the plant will abstract up
		to 25,000m ³ /d of seawater, produce 10,000m ³ /d of potable water and
		discharge 15,000m³/d back to the ocean as brine.
M2	What made you decide to use the Salt Works as the desalination plant site and	There is existing infrastructure at the salt works; it is privately owned land; and
	what is their role in this?	is a licenced mining area.
M2	What is the distance between the Areva plant outlet and the proposed Rössing	The distance is approximately 30 km.
	outlet?	
M2	Will the desalinated water be fit for human consumption? Will this water and	The plant will produce drinking water quality to the same specification as the
	the Omdel water be mixed?	Areva desalinated water. At peak, the proposed desalination plant can produce
C3	The TDS value becomes lower in the NamWater and municipality them storage	up to 10,000m ³ of potable water in every 24 hour cycle (10Mℓ/d).
	tank at Swakopmund.	As is the case with desalinated water from the Areva plant the water derived

Abb.	COMMENTS	RESPONSE
		from the Omdel will be diluted and the quality will improve.
M3	Who is the manufacturer of the plant?	An Israeli company by the name of IDE will be the manufacturer. It will be a
		prefabricated, modular system that will be shipped in pieces to the proposed
		site where it will be assembled.
M3	How much water does Rössing use?	A maximum of 3 million m ³ per annum. During 2013 and 2014 the total water
		consumption was reduced. (Refer to section 3.2 of the SEIA Report).
M5	Is the intention to put the desalinated water into the NamWater system?	Refer to section 3.5.5: Product water produced by the desalination process will
		be pumped via a new 400mm diameter pipeline (steel, ductile iron and GRP
		piping are being considered) to intersect with the existing 700mm diameter
		NamWater pipeline that runs alongside the C34, approximately 850m to the
		east of the site.
E3	The Strategic Environmental Management Plant (SEMP) has set the objective	The SEA (SAIEA, 2010) provides a bird's eye view of cumulative environmental
	of mines sharing infrastructure to avoid the proliferation of power lines and	impacts in the Erongo region brought about as a result of the Uranium Rush
	pipelines - one could add seawater intake, outlet and desalination plant	(and other directly linked developments, and potential developments, such as
	structures. It seems unnecessary to build a second desalination plant at this	desalination and chemical plants), and advises on how to avoid negative
	stage because the AREVA plant has more than enough spare capacity to supply	cumulative impacts and to enhance opportunities for positive impacts, within
	RUL and others.	the uranium sector and between mining and other industries. The SEMP
	I would like to caution RUL against expecting significantly lower treatment	objectives were considered in the SEIA process.
	costs with a process that has not been tested on Namibian seawater (to my	The Areva plant has excess capacity to the current coastal water demand since
	knowledge) and would suggest they explore new ways of coming to a realistic	Trekkopje mine is on care and maintenance. Water cannot be produced at
	price agreement with AREVA and/or NamWater.	affordable prices due to high unit costs of the Areva plant.
		Rössing Uranium is therefore proposing to build, own, and operate a

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M3	What is the future for Rössing when the mine and the desalination plant reach the end of their lifespan?	desalination plant, designed to a much lower capacity than the Areva plant. It is expected that the total cost of water for Rössing Uranium will then decrease to between US\$2.00/m³ and US\$2.50/m³ at point of supply. This is substantially less than the existing water price, which is well above USD3/m³ before conveyancing costs. (Refer to section 3.2 of the SEIA Report for more detail). New long term contracts could be be sourced and the life of mine extended. The plant will be designed to have a 10 year operational life, which ties in with the current Rössing Uranium Life of Mine plan. At the end of the design life period, the plant may be refurbished for continued operation, or may be decommissioned, broken down and the site rehabilitated, or sold as a going concern to another mining house or NamWater, depending on the situation and needs at that time. (Refer to section 3.3. of the SEIA Report). Impacts associated with the decommissioning phase of the plant was also assessed as part of the SEIA process and are presented in section 7 of the
M3	Is there any connection with the Industrial park?	report. No.
M3	What percentage of the water that currently goes to Swakopmund is desalinated water.	Between 15 & 20 % of water to Swakopmund is desalinated water.
M3	How many litres is in a cubic meters of water?	1000 litres = 1 m ³
M4	Rössing plans to pump the desalinated water into the existing NamWater pipeline. What is the possibility of NamWater not allowing the use of their infrastructure?	Cannot comment on NamWater's behalf. However, negotiations with NamWater are underway. The approach to the water reticulation will follow the same methodology as Areva's plan.

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	Are any alternative being considered?	An alternative would be a new pipeline from the desalination plant to the
		Rössing mine, which would require a new project plan and associated SEIA.
		An alternative to the use of the NamWater infrastructure was however not
		being considered as part of this project and SEIA process.
M4	Why not place the whole power line below ground?	Refer to section 3.5.4 of the SEIA Report: The desalination plant and associated
		facilities will be powered via a new 11kV underground cable running from the
		existing Tamarisk substation, located 6km away along the C34 on the outskirts
		of Swakopmund.
		However, an alternative, i.e. putting the distribution line from the Tamarisk
		substation along the C34 above ground as opposed to a buried cable, was
		assessed in the SEIA and would require a number of additional design
		requirement and management and mitigation measures as described in
		section 7 of the SEIA Report.
M4	How does this desalination plant compare to Areva's plant in size and output?	Areva's plant has a design production capacity of 20 million cubic meters per
		annum. The Rössing desalination plant has been designed for 3 million cubic
		meters per annum output capacity.
		The Rössing plant will therefore be significantly smaller than Areva's plant.
		The proposed plant will be housed in two buildings with a footprint of
		approximately 60m X 20m and 20m X 30m. This equates to a footprint roughly
		the size of a rugby field. (Refer to section 3.2 of the SEIA Report).
M4	Why hasn't NamWater already done something like this yet?	The project team cannot respond on NamWater's behalf.
M4	If agreement is reached between Rössing, NamWater and other stakeholders,	Yes.
	will this project be off the table?	

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M5	Will the intake be a jetty type?	Yes.
		(Refer to section 3.5.1 of the SEIA Report for a detail description of the intake
		system).
M5	Will a pilot plant be implemented to test the processes?	A pilot plant is not considered necessary since reverse osmosis is a proven
		process.
		Monitoring requirements have been stipulated in the SEMP.
M5	NamWater also took a few samples at Mile 8 and monthly samples at the	Noted.
	Areva plant. The information can be made available.	
M5	Will the pre-treatment only consist of DAF? How will the effluent be	It is intended that the project will implement a bio-flocculation pre-treatment
	discharged from this pre-treatment system? What about post-treatment?	technology (i.e. ProGreen™ technology). This means, in a best case scenario,
		that there would be no CIP solution; Phosphonate antiscalant; Chlorine; or
		Sodium bisulphate (SMBS) contained in the effluent stream (brine).
		In the worst case scenario, this system will run in parallel or as an additional
		pre-stage to the more traditional dissolved air floatation flocculation system,
		and would potentially serve to reduce the volume of pre-treatment DAF
		chemicals.
		The SEIA assessment is however based on a dissolved air flotation (DAF) only
		treatment process, which is the worst case for this plant.
		(Refer to sections 3.5.2 and 3.5.6 of the SEIA Report for more details on the
		pre-treatment system).
M5	Take note that the new water acts, regulations will be enforced soon with	Noted.
	stricter requirements for Chloride and Boron.	

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Class B for Chloride and Boron will in future not be sufficient.	
To allow for this requirement, the process might require 2 passes.	
The NamWater desalination plant includes a discharge beyond the mixing	Various brine discharge methods were considered as part of the process. Refer
zone (at \pm 600 m into the sea). Is this an option?	to section 4.3 of the SEIA Report).
	The preferred option that was assessed as part of the SEIA is the surface zone
	discharge option (i.e. discharge of the brine beyond the low water mark of the
	sea).
	The impacts associated with this option were assessed in section 7 of the
	report.
The sea water current is in a northerly direction. Will the discharge being	Refer to section 4.1 and 4.2: Various brine discharge location were considered
upstream not impact on the intake quality?	as part of the process. The preferred discharge location is north of the intake.
	(Refer to sections 4.2 and 9 of the SEIA Report).
Other mines might follow the same route. Did the public ask why more plants	This is not the preferred approach (to have all these desalinated plants) as was
will be constructed and why this is happening?	spelled out in the Strategic Environmental Assessment (SEA). However, from a
	cost perspective, Rössing has already curtailed its operations due to the low
	uranium price. It has adopted a survival strategy for the next 3 and half years,
	which includes assumptions of a less expensive desalination source. The
	survival strategy is therefore partially dependant on the success of this project.
	(Refer to section 7.1 of the SEIA report indicating the ppotentially significant
	negative socio-economic impacts if the project does not go ahead and the
	Rössing mine is forced to close prematurely).
If Government allows this plant they should be OK with allowing future similar	No comment.
	Class B for Chloride and Boron will in future not be sufficient. To allow for this requirement, the process might require 2 passes. The NamWater desalination plant includes a discharge beyond the mixing zone (at ± 600 m into the sea). Is this an option? The sea water current is in a northerly direction. Will the discharge being upstream not impact on the intake quality? Other mines might follow the same route. Did the public ask why more plants will be constructed and why this is happening?

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	plants as well.	
M5	How big will the plant be?	The desalination plant will be approximately 60m by 20m (1,200m ²) by 6m
		high. (Refer to section 3.5.3 of the SEIA Report).
M6	Domestic waste water from site offices:	Refer to section 3.5.3.1 of the SEIA Report: Permanent ablutions will be
	What will the arrangement be?	established as part of the RO plant complex. Sewage and grey water collected
	The area where the desalination plant is proposed is a highly sensitive	from kitchen sinks and elsewhere in the facility will be collected in conservancy
	area, therefore it is important that sewage waste is discharged correctly,	tanks. The conservancy tanks will be pumped out on an as needed basis and
	to be arranged with municipality.	the sewage delivered to the existing Swakopmund waste water treatment
		plant for processing.
E1	What about Areva's desalination plant?	The Areva plant has excess capacity to the current coastal water demand since
		Trekkopje mine is on care and maintenance. Water cannot be produced at
		affordable prices due to high unit costs of the Areva plant.
E2	Rössing Uranium is not in the business of supplying water to its self, but to	Cannot comment on behalf of NamWater.
	produce uranium. Water is a key strategic resource and as such I content that	
	we need to obtain the opinion of NamWater as to why they are not the	
	supplier of choice for this entity?	
E5	I am getting concerned by all the proposed desalination plants at the coast.	Cannot comment on behalf of NamWater.
	Last week 24/11 Walvis Bay Municipality had a meeting with NamWater Exec	
	where we were informed that NamWater is in the process of negotiating the	
	take-over / buy-in of the Areva desalination plant and that it would be	
	sufficient for the coast for a few years.	
	It was my understanding that the new Husab mine would again put pressure	
	on a desalination plant / require a new one for its purposes. Now we have	

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	Rössing proposing their own plant. I can understand that the mines would	
	probably want its own water security, but what is NamWater's overall policy	
	on this as bulk supplier.	
E5	In all of this the Walvis Bay Municipality (WBM) was informed last week that	There should be no impact on the municipalities as their water source is from
	we would be expected to contribute towards the water from the Areva plant	Omdel and not from Areva.
	while on the ground it is not possible to supply WBM with this desal water	Cannot comment on behalf of NamWater regarding any information on future
	(although technically possible – but it would mean the reduction of 1,0 million	plans or costing.
	m ³ per year northwards from the Kuiseb to Swakop as it will use the same	
	pipeline). How would another new plant now affect the costing of the water as	
	less water will now be used via the Areva plant when Rössing has its own	
	plant, thereby potentially increasing the unit cost from the Areva plant to local	
	authorities.	
C3	Increased industrial activity between Swakopmund and Wlotzkasbaken or	Refer to section 3.4. The proposed location for Rössing's desalination plant is
	Henties Bay attracts more industry in an already disturbed Dorob National	at the Salt Work (±10 km north of Swakopmund). There is existing
	Park (recreation zone) along the coast line with attractive beaches in the	infrastructure at the salt works; it is privately owned land; and is a licenced
	future, e.g. the government supports the investment for a giant salt work from	mining area.
	a nation in tribalistic conflict (Nigeria) because of potential job opportunities	
	and money.	
C3	The proposed activity because part of an industrial area within the park.	
C3	The energy needed for the osmosis process is supplied by thermal power	The desalination plant and associated facilities will be powered via a new 11kV
	(fossil fuels).	cable running from the existing Tamarisk substation, located 6km away along
		the C34 on the outskirts of Swakopmund. Solar power generation to supply

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		the plant was considered but pursuit of this option has already been
		discontinued for various reasons, as presented in the Scoping Report.
C4	Swakop Uranium is a co – user of the NamWater pipeline and reservoirs.	Noted.
Socio-ec	onomic	
M3	The facility has a lifespan of 10 years. Is this a cost effective option seeing that	The saving in water cost is estimated to be approximately NAD40 million to
	is expensive to implement?	NAD60 million per year against the current water cost. (Refer to section 7.4.2
M6	What is payback period?	of the SEIA Report). The payback period will be approximately 3 years.
M1	Why are the mines not using the existing desalination plant and building a new	At the moment no solution to utilise the existing plant economically is on the
	one? Surely government must step in and force compliance so that each mine	horizon. The existing plant does not belong to the state, but rather to a private
	doesn't have to build its own one?	foreign owed company. The state has no desalination plant of its own. Cannot
		comment on behalf of Government and other parties.
M4	Is the main drive for this project the cost of water?	The main driving force is definitely the cost of water. The estimated cost of
		water for 2014 is roughly N\$132 million as opposed to N\$60 million for 2013.
		The proposed project will result in savings of approximately N\$60 million per
		annum with a payback of just over 3 years. (Refer to sections 3.2 and 7.4.2 of
		the SEIA Report).
M3	What will be the saving for Rössing?	Saving in water cost is estimated to be approximately NAD40m to NAD60m per
		year against the current water cost. (Refer to sections 3.2 and 7.4.2 of the SEIA
		Report).
M3	What will the savings be per unit?	N\$20.
M3	What is Areva charging for water?	Between N\$45 to N\$50 per cubic meter. However, these contracts are on a

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		take or pay basis and therefore during periods of low usage, the actual water
		tariff could easily increase (and has proven to do so) to over N\$90 per cubic
		meter.
M4	Why will the provision of water from this smaller plant present such significant	Firstly, the plant is fit to purpose. The plant has been sized to fit the exact
	cost savings?	needs of Rössing. The second factor is the plant's strategic location (Refer to
		section 3.4). This location enables significant cost savings due to the availability
		of existing infrastructure.
		The motivation behind the project is therefore cost driven.
M3	What will the relationship be with the Salt Works Company?	There will be a contract set up between the Salt Works Company (landowner),
		the contractors who will operate the plant (Gecko Water) and Rössing.
C2	One of our popular tours is the half-day tour to Cape Cross which includes a	The impacts on birds were assessed to low and will therefore not impact on
	visit to the Swakopmund Salt Pans where we watch flamingos and other shore	bird watching activities.
	birds from the most northern edge of the Swakopmund Salt Works.	There will however be construction activities, which could create a temporary
	Will the plant affect this activity in any way?	visual impact.
		A socio-economic impact assessment as well as biodiversity- and visual impact
		assessments have been conducted as part of the SEIA process. Refer to
		sections 7.4, 7.6 and 7.8 of the SEIA Report.
M3	What is the estimated number of workers to be employed during	Approximately 50 over the course of the construction period (refer to section
	construction?	3.3 of the SEIA Report).
M4	Will the Swakopmund Salt Works be compensated for the use of the proposed	There will be financial compensation for the use of the site, but the details in
	desalination plant site?	this regard are contractual and confidential.
M6	Will NamWater still be paid to use their pipeline?	Yes, only for the transfer of the water.
	desalination plant site?	this regard are contractual and confidential.

Abb.	COMMENTS	RESPONSE
C3	The mining industry in Erongo provides mercenary basic service for	The desalinated water from the proposed new plant will by used by Rössing
	themselves and not the inhabitants of the region, i.e. households are released	only.
	from ever higher water tariffs by NamWater. NamWater inherits possibly an	Cannot comment on behalf of NamWater.
	operating drink water source later for the household demand.	
EIA proc	ess (procedural)	
M1	What happens to the data that is collected and can it be made available for	The SEIA reports are public information. The data that will be collected can
	others in a database that allows for others to use the researched information?	also be made available.
M2	Request that the reports also be made available at Arandis and Walvis Bay.	Agreed. The draft reports will also be made available at these locations for
		review.
M3	Are we using Areva's experiences?	The Areva plant is located approximately 30 km from the location of Rössing's
M4	Can the study for the Wlotzkasbaken desalination plant be used for this study?	proposed plant. Areva's plant is also much bigger, with a design production
		capacity of 20 million cubic meters per annum compared to the 3 million cubic
		meters per annum output capacity planned for Rössing's plant.
		NamWater proposed to construct a desalination plant at Mile 6 and an EIA was
		also done for this plant. The information from this EIA process was more
		relevant (relating to its location) and was referred to in this SEIA process. Most
		of the same specialists are also part of the SEIA team for Rössing's proposed
		project.
M5	The Salt Works might fall within a Nature reserve/protected area?	It falls outside of the protected area.
M6	The area where the desalination plant is proposed is a sensitive area.	Noted
	Therefore, if something goes wrong in the surrounding area, Rössing will be	
	blamed.	
E6	Under the legal framework neither the Marine Resources Act nor the	Noted. Reference to these to Acts was added to Section 2 of the final SEIA

Abb.	COMMENTS	RESPONSE
	Aquaculture Act are mentioned. Both should be added.	Report.
Avifauna		
M4	Are there any glaring environmental issues associated with the project?	The preliminary or "Base Case" project (i.e. conceptual project as envisaged at
		the completion of the pre-feasibility stage) is an important bird area. The site is
		known as a Damara Tern (core) breeding site and Damara Terns in particular
		have therefore been looked into and assessed. Refer to section 7.8 for a
		detailed bird impact assessment. The outcome of this study has influenced the
		position of the desalination plant, which has been removed from the core
		breeding area. (refer to section 8 of the report).
Marine ecology		
M1	Rössing needs to check that the inlet and outlet are situated properly so that	Refer to section 4.2 of the SEIA for alternatives relating to the brine discharge
	the inlet isn't taking in the brine from outlet and also take the currents into	locations.
	consideration.	The intake and discharge locations have been determined by the Engineers,
		with input from the SEIA specialist assessments (i.e. marine ecology, etc.).
		Refer to section 4.12 and Table 18 of the report.
	The management plan set up for the project should explain the monitoring	Noted. The Social and Environmental Management Plan (SEMP) includes the
	requirements in detail. These requirements were in certain instances too	monitoring requirements.
	vague in the previous desalination project.	
M2	With reference to the suction line taking in the seawater and pumping the	The intake system poses a risk of mortality of plankton, fish eggs and fish
	brine minerals back into the sea, what are the long term effects of this?	larvae when water is sucked in at the inlet areas. The potential impacts has
C3	What about environmental change , i.e. aqualife at the affected coast due to	been assessed as part of the SEIA process and relevant design, management
	established salt work activity with an additional concentrated waste solution	and mitigation measures developed out as a result of this study. Refer to
	outlet?	section 7.9 for Marine Ecology Impact assessment.

Abb.	COMMENTS	RESPONSE
M1	Can we make it possible for Anja and her team (MFMR) to work with Pisces on	Anja Kreiner was consulted during the Marine Ecological Assessment and such
	this so that her team can gain experience?	possibilities discussed.
M6	Monitoring of the brine discharge:	The monitoring requirements have been developed as part of the SEIA process
	Monthly monitoring results must be submitted in time	in consultation with the Marine Ecologist and are presented in the SEMP.
	Who will do the monitoring?	
	Suggestion that a marine ecologist needs to conduct at least bi-annual	
	monitoring.	
M6	Discharge of brine:	Please refer to section 2.12 of the SEIA Report as well as the Marine Ecology
	There are no Namibian Standards yet	specialist report for a detailed discussion regarding the water quality
	Look at international best practice	guidelines that were referred to as part of this SEIA.
E4	It will be interesting to see the outcomes of the ocean engineering modelling /	No ongoing baseline monitoring was required for the purposes of the
	monitoring to see which of the options will provide the best quality feed	diffusion modelling. Baseline monitoring will occur in the construction
	water, whether upstream or downstream of the discharged brine. It will	phase and lead up to plant commissioning, so that the operational phase
	interesting to know how consistent the currents, rips and eddies are. Do you	environmental monitoring will have a baseline against which it can
	know how long the baseline is or was being run for?	assess results. For the diffusion modelling the shoreline was mapped as
		part of the shoreline dynamics assessment, and this information was
		used along with existing data from the area (predominantly the Mile 6
		desalination plant studies). A major component of the brine diffusion
		modelling study was to characterise and quantify the parameters that
		influence the dispersion and dilution of the effluent brine (apart from the
		jet entrainment) in the surfzone. This was done through an analysis of
		existing data, supported by numerical modelling of wave transformation
		and longshore currents in order to quantify the conditions at the point of
		discharge.

Abb.	COMMENTS	RESPONSE
		For further details in this regard, refer to Annexures D7 - Brine Dilution
		Modelling and D8 – Shoreline Dynamics.
		Regarding feedwater quality, the intake site is not the pivotal aspect
		affecting feedwater quality for this project, the use of the salt works
		intake channel and buffer ponds will have the greatest effect on
		feedwater quality. It is expected that the unusual intake system (i.e a
		long channel and buffer pond) will reduce turbidity and suspended solids
		and increase water temperature which will allow the plant to use less
		pretreatment chemicals in the process. This system should also provide
		the plant with a buffer against upset conditions at sea (i.e. high sediment
		loading during storms or high seas and protection during potential
		sulphur eruptions and algal blooms that could impact on feedwater
		quality).
E6	At the sampling point at the edge of the predicted brine mixing (EMP Figure	In Section 6.6.2.1 of the SEMP under "biological monitoring" is stated: Rössing
	6), biological sampling should also be done (e.g. survival of early life stages of	Uranium should appoint a marine ecologist to assist with the biological marine
	species occurring in the area) – I think Phillip Hooks mentioned that in the	monitoring, diffusion and whole effluent toxicity (WET) test and validation
	meeting it is not clear to me if that is planned in the current SEMP.	requirements A monitoring program should be developed to study the
		effects of the discharged brine on the receiving water body, and/or intertidal
		biological communities surrounding the discharge location, particularly as
		monitoring of the affected subtidal benthic communities is in this case not
		feasible. This is because the sampling point is located in the mid –surf area
		where biological survey would be exceedingly difficult, that is why chemical
		diffusion monitoring was proposed in unison with Whole Effluent Toxicity

Abb.	COMMENTS	RESPONSE
		testing, and assessed by a qualified marine ecologist to determine
		acceptability.
E6	It is stated somewhere that the exact constitution of the brine is not known	This requirement has been added to the SEMP.
	yet. It is essential to mention that consultation between the desalination plant	
	and MFMR are done, before the plant goes into operation so we know exactly	
	what is pumped into the ocean and in what amounts.	
L1	It is not clear whether the discharging of brine from the proposed desalination	Based on the diffusion modelling, elevated salinity levels should fall back to
	plant will have an impact on the water quality to be abstracted by the	undetectable levels (i.e. near ambient) within 50m of the diffuser (point
	NamWater plant.	discharge), therefore the potential for the Rössing's brine discharges to
		prejudice water quality for the planned Mile 6 desalination are considered
		negligible.
		Refer to sections 7.4.2.2 to 7.4.4 and section 7.10.4 in the SEIA Report.
Waste M	lanagement	
M5	How much solid waste will be produced? How much will be filtered out?	Refer to section 3.5.3. The operations phase is not expected to generate
		significant volumes of waste and will be restricted to mostly domestic waste
		and chemical containers and packaging.
		For larger desalination plants it is considered best practice to collect the filter
		screenings and sludge (including those from the dissolved air floatation and
		ProGreen bio flocculation process, if used) and desiccate it before being
		disposed of via landfill, however in the case of the Rössing Uranium
		desalination plant, due to the small plant capacity, these solids may be co-

Abb.	COMMENTS	RESPONSE
		discharged with the brine, and allowed to diffuse back to ambient
		concentrations. The impact to marine ecology associated with the release of
		these solids back to the ocean is assessed as being low. (Refer to section 7.9.3
		of the SEIA report).
Noise		
M1	There is some wind study data available that was obtained from our weather	The noise assessment included the necessary wind-related information.
	station and put together by a German student. This information can be made	Thank you (Ministry of Fisheries and Marine Resources) for making information
	available to your noise specialist.	available.
M4	I currently live in Mile 4. Will I be affected by increased noise levels?	A noise specialist has assessed noise impacts as part of the SEIA process. (Refer
		to section 7.7 of the SEIA Report).
		The specialist has assessed the noise impacts and has proposed mitigation
		measures which will be included in the SEMP. Noise impacts on humans were
		assessed to be very low.
C1	Why can't the plant be located at the northern end of the pans? This would	The Salt Works property is private property and therefore presents a feasible
	simplify the channelling of the water to the plant and is further from Mile 4	solution. Any other solution would have to be on state land and as such would
	(less noise).	present additional complications on land use.
		Refer to section 4.12 of the SEIA Report: Various location options have been
		considered to allow for the best practical design. The Swakopmund Salt Works
		is the designated location of the proposed desalination plant with the
		objective to supply water to the Rössing Uranium Mine. There are a number of
		potential locations for the proposed desalination plant within the boundaries
		of the Salt Works area. The purpose of this trade-off studies was to determine
		the optimum location of the plant within the Salt Works based on the multi-

	COMMENTS	RESPONSE
		criteria considering technical, financial, legal & regulatory, environmental and
		other criteria.
Permitting	g	
M1	What legal permits have to be obtained?	The environmental Clearance Certificate from MET as a result of the SEIA
M5	What permits will be applied for?	process. Also, a permit from MAWF for the water intake as well as a permit for
		the discharge of the brine into the sea.
		Please refer to a complete list of permits and agreements to be required in
		section 4.2 of the SEMP.
M6	Permit applications:	
	• The permit application must be submitted in parallel with the submission	Noted.
	of the Draft SEIA Report.	
	• The permit will be issued based on projections of discharge.	Noted.
	• If a permit is issued, it will be for 5 years on condition that if any changes	Any such increases would require redesign and another SEIA process.
	to volume of discharge foreseen, this must be notified in writing to the	
	MAWF. Therefore, make sure the demand will not increase.	
M6	The same application form must be used for the brine discharge and the	Noted
	domestic effluent discharge. The application must be accompanied by the	
	agreement letter from the municipality. The agreement would define the way	
	the municipality will manage the sewage.	
E6	The Benguela Current Large Marine Ecosystem (BCLME) programme has	These guidelines have been added to Table 2 of the SEMP.
	established some water quality guidelines which we usually recommend being	
	followed (e.g. for the LLNP experimental plant in Luederitz). The BCLME report	
	can be found under http://www.dlist.org/sites/default/files/doclib/BEHP-	

Abb.	COMMENTS	RESPONSE
	LBMP-03-04.pdf	
	This should definitely be included in the SEMP (Table 2)	