

ALL RISE

Attorneys for climate and environmental justice

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Ms J Callaghan

GCS Water & Environmental Consultants (Pty) Ltd

Email: janicec@gcs-sa.biz

17 June 2022

Dear Ms Callaghan,

RE: IMVUKUZANE RESOURCES (PTY) LTD - APPLICATION FOR ENVIRONMENTAL AUTHORISATION - PROSPECTING RIGHT AND RELATED INFRASTRUCTURAL ACTIVITIES – FULENI RESERVE 14375 GU, PORTION, ULUNDI LOCAL MUNICIPALITY, KWAZULU-NATAL: KZN30/5/1/1/2/10747 PR – COMMENTS ON DRAFT BASIC ASSESSMENT REPORT

1. All Rise Attorneys for Climate and Environmental Justice (All Rise) is a non-profit organisation and registered law clinic. We represent the **Global Environmental Trust (“GET”)**, **Mining Affected Communities United in Action (“MACUA”)**, and the **South African Conservation Fund** in the aforementioned application.
2. All parties have registered as Interested and Affected Parties and were provided with access to the draft Basic Assessment Report (“draft BAR”) on 11 May 2022 for comment. Additional technical information and DMRE correspondence was requested from GCS. Most of the information requested was only provided by 10 June 2022. As such, All Rise requested an extension to 17 June 2022 which was agreed to by GCS.
3. In perusing said report and related documentation, we have identified a number of non-conformances with the Environmental Impact Assessment Regulations, 2014 (as amended) (“EIA Regulations”) which we will submit to the competent authority in terms of Regulation 14(2) should the EAP not address these non-compliances going forward.
4. We hereby submit comments on the draft BAR under a number of headings and for ease of reference, provide section and page references in the draft BAR (including the specialist

reports, Screening Report and Environmental Management Programme (“EMPr)), Application for Environmental Authorisation and Prospecting Works Programme.

5. The reason that our clients are concerned about the applicant's proposed prospecting activity and feel compelled to submit these comments, is that they have direct knowledge of the large-scale harm that coal mining has already caused and is causing on the environment, the Hluhluwe-iMfolozi Park and the local communities in the region. These mining activities include the Zululand Anthracite Colliery (“ZAC”) owned by Menar, which we understand to be associated through directorship and holdings to Imvukuzane. Menar also owns Canyon Coal which we understand will be financing the prospecting activities. In our client's view, Menar does not have a good track record when it comes to compliance and environmental management, the spillage of toxic wastewater from the pollution control dam on 24 December 2021 at the ZAC coal processing plant is a recent example.
6. It is our experience that the decisions made by government are too often blinkered by the promise of employment and other socio-economic benefits without weighing these benefits up against the significant adverse impacts and long-term costs borne by the affected communities. This is especially so where these impacts are not presented in the EIA reports evaluated by the authorities when making their decisions, as they should be.
7. Coal mining repeatedly forecloses on alternative, more sustainable land uses; undermines biodiversity conservation efforts; impacts heavily on water resources; strips people of their land rights; destroys subsistence-based livelihoods and cultural heritage; causes division in communities; and erodes people's right to an environment that is not harmful to their health or well-being – a right afforded to them by Section 24 of the Constitution, 1996.
8. The prospecting activities proposed by Imvukuzane thus cannot be assessed or evaluated in isolation to the:
 - 8.1. The current and future mining operations of ZAC located northwest and west of Imvukuzane's proposed prospecting area, and which fall in the five traditional authority areas of Zungu, Matheni, Mlaba, Mandlakazi and Ximba; the iMfolozi catchment; and on the northern and western boundaries of the Hluhluwe-iMfolozi Park.
 - 8.2. The current and future Somkhele mining operations of Tendele Coal Mining (Pty) Ltd in the Mpukunyoni Traditional Authority area and the iMfolozi and other catchments; and on the eastern boundary of the Hluhluwe-iMfolozi Park, and immediately north of the Imvukuzane prospecting area.

8.3. The other current prospecting applications by Yengo Resources (Pty) Ltd¹ in the Ximba Traditional Authority area on the southwestern boundaries of the Hluhluwe-iMfolozi Park; by Tendele Coal Mining (Pty) Ltd in the Mpukunyoni Traditional authority on the eastern boundaries of the Hluhluwe-iMfolozi Park and by Raycom Resources Pty Ltd, southwest of the Imvukuzane prospecting area and the Hluhluwe-iMfolozi Park.

8.4. The previous prospecting activities already conducted by ZAC in the same area that Yengo is now proposing to prospect; by Ibutho Legacy (Pty) Ltd in the same prospecting area that Imvukuzane is now proposing to prospect²; and by Tendele in the same area for which it is again applying for a prospecting right.

8.5. The mining rights held by Mbila Resources (Pty) Ltd³ for the Msebe Opencast Anthracite Mine and Mbila Underground Mine both east of Nongoma, also in the Zululand District Municipal area.

9. We note that apart from mentioning the presence of Tendele's Somkhele coal mine as part of the description of the baseline environment, there is no other reference to these mines (current and future) in the draft BAR.

Please note that in submitting the following comments on the draft BAR, we have concentrated only on what we consider to be its most significant failings. Failure to submit comments on all other sections does not mean that we agree with the contents thereof. If the main issues are addressed, these other sections will in any event require substantive amendment.

Failure to identify and assess cumulative impacts

10. The failure to mention in the draft BAR, the aforementioned past, current⁴, and future mining-related operations in the region and their associated cumulative impacts is in direct contravention to the reporting requirements prescribed by the Environmental Impact Assessment Regulations, 2014 (as amended) ("EIA Regulations") and is the first submission we make in respect of the inadequacies of the draft BAR.

¹ Understood to have been previously prospected by ZAC.

² Notably, some of the damage caused by Ibutho Coal's prospecting activities is still visible on Google Earth imagery more than 10 years later.

³ Two of the directors of Mbila Resources (Pty) Ltd are also the managing and financial directors of Petmin, which owns Tendele Coal Mining (Pty) Ltd.

⁴ The only reference to other mining-related activities in the area is on page 4, 5 and 13 of the draft BAR where the "existing Somkhele Anthracite mine" is mentioned in passing to describe the geographic setting and site. However, there is no attempt to identify or assess cumulative impacts.

Lack of objectivity

11. Our overall view of the draft BAR is that it is yet another “sweetheart” report prepared by GCS for a proposed mining-related activity in this region, in that it overstates positive impacts (despite not having all the necessary information to make such findings) and downplays or fails to identify all the negative impacts. It also ignores certain material findings and recommendations made by specialists.
12. In doing so, the EAP has not performed the work relating to the application in an objective manner, specifically because he has not presented all the findings that are unfavourable to the application and is thus, non-compliant with Regulation 13(1)(d) of the EIA Regulations.
13. These allegations are substantiated in the paragraphs that follow.

Failure to present all material information to I&APs

14. The EAP has also failed to comply with Regulation 13(1)(f) of the EIA Regulations in that he has failed to disclose all material information to the registered Interested and Affected Parties (“I&APs”).
15. All the figures in the draft BAR are of such a small scale that it is impossible for I&APs, including local residents who are well familiar with their area, to know exactly where these borehole sites are to be located. The EIA Regulations require a plan and sensitivity map at an appropriate scale that shows not only the proposed activities, but also associated structures and infrastructure, be provided in the BAR. The draft BAR falls short of this requirement and should provide a large-scale map for each borehole or cluster of boreholes with an accompanying description of the receiving environment at that site and the associated impacts and mitigation measures.
16. The draft BAR and specialist studies are inconsistent in stating just how much area will be cleared around each borehole ranging from 25m by 25 m (625m²) to 100m². In recent email correspondence, the EAP has confirmed that the area to be cleared will be 400m². This figure is consistent with the area contained in the Application for Environmental Authorisation dated 7 April 2018. These discrepancies in the BAR should be addressed.
17. One of the major omissions, and thus a key flaw in the draft BAR is the failure to disclose the need for additional access roads for many of the borehole sites, and thus determine and assess the full extent of the area that will need to be cleared of indigenous vegetation, and also potentially affect land use rights and cultural heritage resources.

18. In describing the proposed activity in Section 2.3 (page 7 of the draft BAR) and Section 1.8.1 (page 6 of the EMPr), the following is stated: "*No additional roads are foreseen to be required, existing tracks will be used as far as possible.*"
19. This assumption is repeated under Section 9 (page 52 of the draft BAR): "*It is assumed that the existing farm roads will be used, and no additional roads are foreseen to be constructed*", It is also an assumption made in the various specialist studies contained in Appendix B of the draft BAR.
20. However, by plotting the co-ordinates of each of the 55 borehole sites⁵ onto Google Earth imagery, the falsity of these statements and assumptions are exposed. We have not provided the Google Earth images for each borehole – this is something the EAP should have provided in the draft BAR – but to illustrate our point, we have attached images which clearly show that additional access roads will be needed through dense vegetation, some well more than 100m in length. These images are contained in **Annexures 1 and 2** attached.
21. The BAR also states that there will be no watercourse crossings. It is clear from the plotting of these boreholes on Google earth imagery that there may well be watercourses that will need to be traversed to access some of the sites, Boreholes 19 to 24 being a case in point (**Annexure 3** attached). There are others, these being just a few examples. Again, it is the EAP's and specialists' duty to identify all of these potential crossings and assess the associated impacts, and to make recommendations to mitigate the associated potential impacts. The current mitigation measure in the draft BAR and EMPr to avoid watercourses wherever possible is wholly inadequate, especially as it is possible to determine these impacts and provide for their mitigation as part of the basic assessment. (*Notably, the need to cross watercourses, especially with such heavy vehicles and machinery, may also trigger a water use licence or general authorisation in terms of the National water Act, 1998 which is contrary to the statements made on pages 10 and 13 in the draft BAR*).
22. Further, information about the size and weight of the vehicles and drilling equipment is not provided in the draft BAR. In fact, GCS admitted that it did not have this information when we requested it on 30 May 2022 and had to request it from the applicant. As can be seen from the information provided (**see Annexure 4** attached), there are a number of significantly large, heavy vehicles and drilling equipment that will be required for prospecting, including a 30-ton low bed truck, a 30-ton crane and drilling rigs of 13 and 14 tons each. This information is material as it indicates the type and magnitude of associated impacts such as the additional

⁵ The co-ordinates for the 55 bore hole sites are provided in Table 2-1 on pages 5 and 6 of the draft BAR.

clearing of vegetation for access, potential damage to agricultural resources and heritage resources, compaction of the soils and watercourses, and increased erosion on slopes.

23. It is clear from the omission of this information in the draft BAR and in the specialist studies, especially the terrestrial ecological and wetland study and the heritage “notice of intent” that the negative impacts associated with additional access roads and traversing of watercourses have not been identified or assessed.
24. It is not clear from the draft BAR whether only diamond drilling technology will be used (as stated on page 8 under Section 2.3.3) or prospecting will be conducted using three drilling methods – “*diamond, reverse circulation and percussions drilling*” - as stated on page 9 of the same section in the draft BAR. Further, there is no detail provided about these different drilling methods, which is especially relevant in terms of dust, noise, emissions, use of hydrocarbons, and type of equipment that is needed on site.
25. Further, not only has the EAP failed to identify and/or downplayed the negative impacts associated with the proposed prospecting activities, but he has overstated the positive impact of job creation.
26. It is stated in the Executive Summary (page vi) and again in the Environmental Impact Assessment (page 53) of the draft BAR that the following impact associated with the proposed project is considered to be of **positive** significance: “*Employment opportunities for local communities*”.
27. However, when All Rise asked on 30 May 2022 for the details of the employment opportunities (**see Annexure 4**), as this information was not provided in the draft BAR, the EAP also did not have this information on hand and had to request it from the applicant. In response to our request for the “*details on job opportunities for local residents (number of positions, description, duration)*”, the following information was provided: “*Approximately 6 positions: 2 general workers and 4 security (subject to change), approximately 6-12 months (subject to change)*”
28. The “4 security” positions are not necessarily going to be given to local residents but more likely to people already trained and employed by a security company. One of the mitigation measures in the EMPr in any event requires the applicant to “*Appoint an independent security company to monitor the site*”. Thus, the prospecting project will at most create a very short-term opportunity for **two** local residents – hardly of significance and thus, these statements in the draft BAR (and “non-technical summary” in English and isiZulu) are misleading.

29. As with the access roads and machinery specifications, it is concerning that not only does the EAP not disclose this material information in the draft BAR but also makes an assessment without having obtained these essential facts from the applicant. For these reasons, it is our submission that the draft BAR needs to be rewritten and the public participation process redone.

Failure to fully describe the socio-economic conditions of the area

30. The draft BAR fails to describe the socio-economic conditions of the prospecting area, instead relying on relatively outdated statistics at a municipal level which are of little relevance to the assessment required. The omission of the necessary information is not only non-compliant with the reporting requirements of the EIA Regulations but also means the identification and assessment of socio-economic impacts is lacking.

Failure to identify and assess all site and technological alternatives

31. The EIA Regulations require that alternatives are identified and assessed in the draft BAR and that *“if no alternatives, including alternative locations for the activity were investigated, the motivation for not considering such”*.

32. The EAP reasons that *“Due to the geology of the area and the potential for coal, no other sites or methods of exploration/ prospecting are applicable. It is assumed that the points chosen were determined in conjunction with a geologist as per the prospecting programme”*.

33. However, it does not appear that the Prospecting Works Programme supports this reasoning. On page 9 of said Programme, it is stated that *“It is not possible at this stage to locate exactly where drilling will be carried out as this will be determined by the results of geophysical and geological work carried out in Phase 1 of the prospecting programme”*.

34. Further, the EAP offers no motivation as to why technological alternatives for drilling were not assessed. As described in paragraph 24 above, the draft BAR simply informs I&APs that three types may be used – *“diamond, reverse circulation or percussions drilling”*. This is important as we understand that there are different noise, vibration and dust levels associated with the different technologies, and the EIA Regulations require a comparison of the impacts associated with each alternative so that the preferred alternative can be selected and approved. The different methods may also require different size machinery, which in sensitive areas will be important in terms of reducing vegetation clearance and compaction impacts.

35. The consideration of alternatives is also absent from the specialist reports.

Failure to conduct an agricultural specialist study

36. The Screening Report (Appendix C of the draft BAR) identifies the prospecting area as having “very high sensitivity” in respect of agriculture and identifies the need for an “Agricultural Impact Assessment”.
37. The draft BAR⁶ and some of the specialist reports⁷ acknowledge that agriculture is a predominant land use in the area.
38. Each of the 55 boreholes require a clearing of 400m², which in total amounts to a footprint of 22 000m² (2.2 ha) – the size of three premier league soccer fields.
39. This estimation does not include the area that will need to be cleared for access roads, which we submit will be significant and potentially double the area required for the boreholes.
40. Further, many of the boreholes are clustered in groups thus the impact is not evenly spread out or dispersed / dissipated over the whole proposed prospecting area, and in certain areas, could be cumulatively significant.
41. Also, the heavy equipment (some of which will be more than 30 tons – 30-ton crane on back of a low bed truck) will likely cause compaction to the soils. This impact was not identified.
42. Despite these factors, GSC motivates for not conducting an agricultural specialist study, as follows:

“A small area will be disturbed for each borehole. An agricultural assessment will not be conducted as the impact will be limited”.⁸

43. Given the high level of dependence of local residents on agriculture (cultivated fields and natural grazing) for their livelihood and cultural practices, and a relatively large area that will be impacted (albeit not fully identified in the draft BAR), this motivation should be rejected.
44. We call on the applicant to instruct its EAP to commission an agricultural study based on the gazetted “Protocol for the specialist assessment and minimum report content requirements for environmental impacts on agricultural resources”, failing which, the competent authority should reject the application for environmental authorisation.

⁶ Section 3.2, page 7; section 3.4, page 23; section 6.6, page of the draft BAR.

⁷ Section 3.1.5 on page 37 of the Ecological Impact Assessment and Wetland Report, Appendix B of the draft BAR.

⁸ Page v of the Executive Summary, draft BAR.

Inadequate cultural heritage resource specialist study

45. Similarly, the Screening Report (Appendix C of the draft BAR) identifies the prospecting area as having “very high sensitivity” in respect of heritage and identifies the need for an “Archaeological and Cultural Heritage Impact Assessment”.
46. The area is known to be rich in heritage resources. The “Notice of Intent” by the archaeologist in Appendix B says as much:
 - 46.1. Page 18: *“Information obtained from several archaeological databases show a high occurrence of heritage sites in the area (Figure 11) with several known sites located inside the study area (Figure 12). According to SAHRIS the study area itself has not been subjected to a HIA and it is expected that a high frequency of similar sites to finds in the greater area can be found in the Project area, including heritage resources such as:*
 - *Middle and Late Stone Age sites;*
 - *Rock art sites;*
 - *Iron Age stone walled sites related to the rich Zulu heritage of the area;*
 - *Cultural landscapes and also natural heritage of the area;*
 - *Places associated with oral traditions and living heritage;*
 - *Numerous Grave sites.*
 - 46.2. Page 23: *“This NID notes that the greater study area is rich in heritage resources and although the area of impact relating to drill sites has not been subjected to a HIA, similar resources can be expected in the drilling areas”.*
47. The “NID” also states that *“Although the impact of the drill sites is small, without management action in place these activities could have a negative impact on non-renewable heritage resources”.*
48. The reason given for not conducting an HIA, despite the area known to be rich in heritage resource and the potential for a negative impact on these resources, is that *“Due to the size of the prospecting area, limited access, and the extended timeline of the prospecting plan it is not feasible to conduct an HIA”*.
49. This motivation should be rejected and a HIA conducted prior to environmental authorisation being considered, especially as the 55 borehole sites are known and the applicant has had plenty of time to commission such a study. Further, the HIA must also include the additional access roads that will be required for the borehole sites and should ensure that local and traditional knowledge is included.
50. Further, the recommendation that *“the Project can commence without a full HIA”* is unlawful and non-compliant with the EIA Regulations.

Inadequate terrestrial ecological study

51. The Ecological Impact Assessment and Wetland Report in Appendix B of the draft BAR was conducted in 2018 prior to the confirmation of the 55 borehole sites and does not assess these proposed sites in adequate detail.
52. The study did also not consider the impacts associated with the additional access roads, the heavy machinery or the watercourse crossings.
53. It is clear that the assessment of impacts on fauna is inadequate and the focus on plant species would suggest that specialist's expertise does not extend to zoology.
54. For these reasons, additional specialist study is required.

Missing noise assessment

55. The Screening Report (Appendix C of the draft BAR) identifies the need for a "Noise Impact Assessment". There is no noise specialist report included as part of the draft BAR nor is there any motivation provided as to why such a study was not done.

Potential groundwater impact ignored.

56. The draft BAR states that the boreholes will be drilled to a depth of between 25m and 125m with an average of approximately 70m. It is clear from the groundwater specialist study in Appendix B of the draft BAR that some of the boreholes are likely to intercept aquifers.
57. Despite this, the specialist makes the following conclusion, which the EAP accepts, that there is "*no predicted impact on groundwater*". However, this conclusion appears to be based on the following assumptions:

"As the drilling activity will be controlled, taking place on an area limited to a 14t drill rig with highly likely a mounted compressor, the impact on the local groundwater regime is anticipated to be zero.

The only risk to the groundwater will be in the event of deliberate pollution by the appointed drilling contractor, which goes against standards of ethics and SABS guidelines for the drilling exploration of boreholes.

58. The whole objective of an assessment is to identify potential impacts so that measures can be put in place firstly to avoid the impact, and only if this is not possible, to minimise and remedy the impact.

59. Because drilling requires the use of hydrocarbons, there is a risk of groundwater pollution. This risk is also communicated in the Ecological Impact Assessment and Wetland Report. Thus, as a potential impact, recommendations to avoid, or minimise and remedy it need to be included in the draft BAR and EMPr, not simply dismissed by the EAP as is currently the case.

Failure to incorporate all specialist recommendations in the draft BAR

60. Figure 4.9 of the Ecological Impact Assessment and Wetland Report⁹ presents the red areas as no-go areas.

61. Although the EAP and the specialist did not plot the 55 boreholes in relation to these no-go areas, it is evident that a number of boreholes fall within these areas, including points 4, 7, 42, 35 – 38. Thus, almost 20% (10 of the 55) boreholes should not be approved as they fall within these no-go areas.

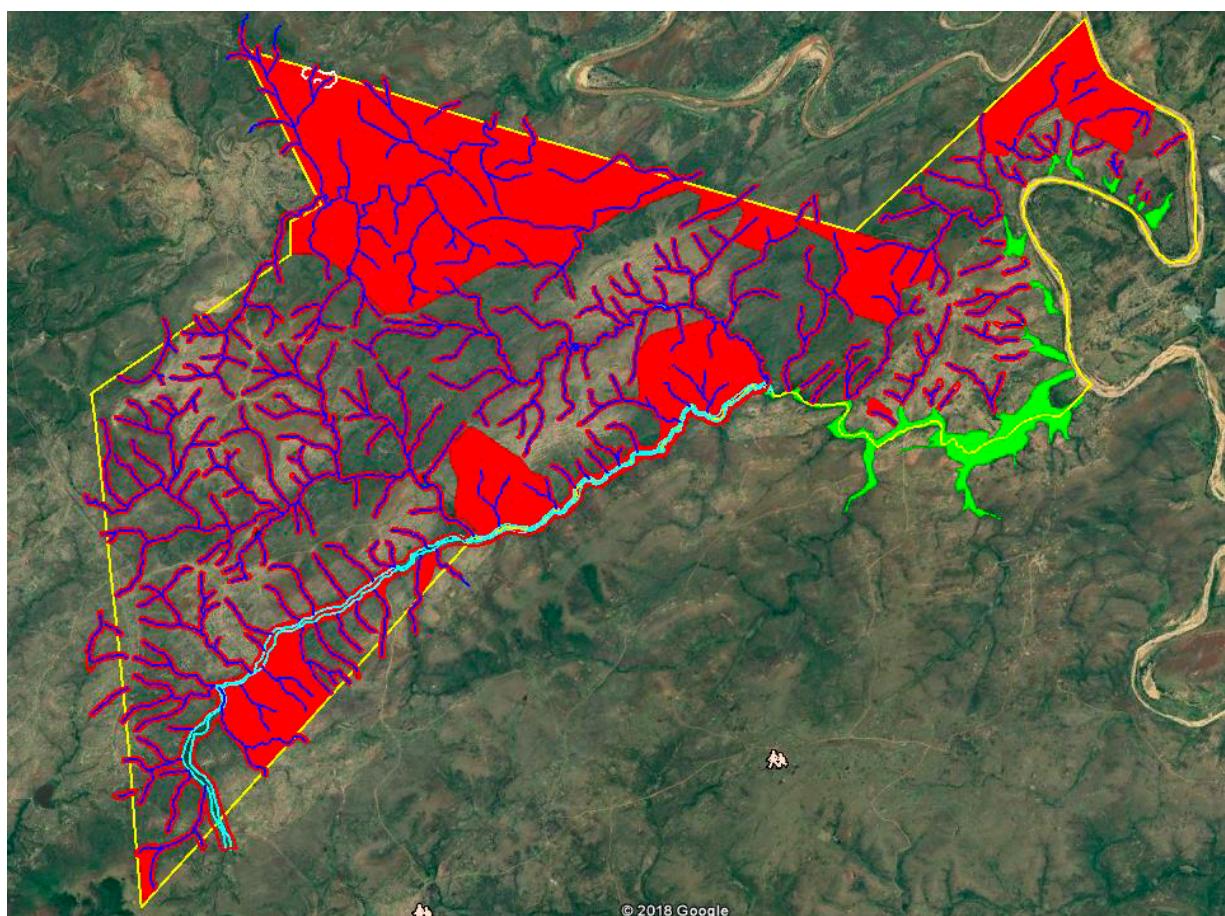


Figure 4.9: The red and green areas indicate no-go areas in terms of proposed protected area expansions, sensitive wetlands. There are 100m buffer zones around the two rivers and 32m buffers around the seasonal drainage lines (blue lines). The green areas are larger floodplain and valley-bottom wetlands.

⁹ Page 64 of the Ecological Impact Assessment and Wetland Report, Appendix B of the draft BAR.

62. Further, Section 11 (page 58 of the draft BAR) only contains recommendations made by the heritage specialist in the “Notice of Intent” and is thus incomplete and non-compliant with the reporting requirements prescribed by the EIA Regulations.

Incomplete identification and assessment of impacts

63. As a result of missing technical information, and inadequate specialist studies and public participation (see discussion below), the identification, assessment and mitigation of impacts cannot be considered accurate or complete, and thus, sections 8 to 12 of the draft BAR that record the findings and recommendations of the basic assessment cannot be relied upon to make an informed decision.

64. Further, and as already submitted in paragraph 10, cumulative impacts have not been identified or assessed.

Environmental Management Programme (EMPr) and Financial provision

65. Until the deficiencies in the assessment process are addressed, it stands that the EMPr and financial provision must also be rejected.

Inadequate public participation process

66. The public participation record in the draft BAR (Section 7 and Appendix D) is very sparse in detail and thus, it is impossible to comment on the adequacy of the process. For example, the location of the site notices, minutes of meetings and the I&AP database are not contained in the draft BAR, nor are the comments which were submitted when the basic assessment was first initiated in 2018.

67. However, we do know from our community client MCEJO that its members are extremely dissatisfied, as are other members of the community, with the way the EAP has attempted to conduct the public participation in the community and the applicant’s and the EAP’s complete disregard for customary practice and protocol.

68. We are also highly critical of the lack of information that has been provided in isiZulu, the predominant language in the prospecting area and of the people who will be most affected by the proposed prospecting activities

69. In contrast to a 411 page “technical” report in English, albeit missing material information, a mere two-page “non-technical” summary was provided in isiZulu on 31 May - only at our

request and seemingly only sent out via email. Despite the late production of this summary in isiZulu, no extension of time for comment on the draft BAR was provided, and not only that, but our community clients have also confirmed that they have yet to receive a copy of the summary in isiZulu.

70. This late production is also inexcusable given that the applicant knew the isiZulu summary was required as far back as 21 January 2022 (**Annexure 5**) as it used this as one of the reasons to motivate for an extension:

During initial community engagement the I&AP's informed the EAP that they require all correspondence and reports in English and isiZulu. To date both languages (where possible) were used by Imvukuzane to communicate with the registered I&AP's and stakeholders. It is proposed that the Executive Summary of the draft BAR be translated to isiZulu prior to distributing for public perusal, the translator informed us that a minimum of two weeks will be required. The BAR will be finalised once public participation and the specialist studies are complete.

71. Notwithstanding the late production of the summary in isiZulu and the failure to provide copies to the I&APs who actually need it, the sparse contents of summary renders it meaningless. For example:

71.1. Most of its two pages are a repeat of the notification document. The actual findings of the basic assessment are limited to the following paragraph:

ENVIRONMENTAL IMPACT STATEMENT

All negative Medium significant impacts can be mitigated to Low significance. The following impacts associated with the proposed project are considered of Positive significance:

- *Employment opportunities for local communities; and*
- *Determination of the potential and extent of the reserve.*

71.2. We have already discussed the misleading nature of the statement about the positive significance of job creation for local residents in paragraphs 25 to 28 above.

71.3. None of the negative impacts are described.

71.4. None of the mitigation measures in the EMPr are provided.

71.5. There is no map showing the locality of the boreholes, nor does the summary even mention how many boreholes are proposed.

- 71.6. The summary, like the draft BAR, omits other material technical information such as the need for additional access roads and the size of the vehicles and machinery necessary for the prospecting activity.
72. In view of the above, the public participation process cannot be considered adequate or appropriate and without it being done again and properly, any BAR submitted to the competent authority for consideration must be rejected.

Conclusion

73. Based on these submissions, which include flaws in the public participation process and incorrect and incomplete information in the draft BAR, together with the lack of compliance with Regulation 13(1) in respect of the EAP, it is our clients' submission that the competent authority cannot approve the current application for environmental authorisation.
74. If the applicant has any hope of succeeding with its prospecting application, it is our client's view that the whole process must start afresh and fully comply with the EIA Regulations and other applicable legislation and guidelines.
75. Should, however, the applicant proceed with its application and submit a final BAR to the Department, we request that within a week of such submission, all I&APs are notified, and a copy of the final BAR and related documentation is made available, including the applicant's / EAP's responses to the I&AP comments.
76. Kindly acknowledge receipt.

Yours sincerely

Janice Tooley

(Sent by email and therefore unsigned)