

CONSULTATION WITH INTERESTED AND AFFECTED PARTIES

4.1 Public and Authority Input

No new consultations were held during the revision of the EMPR. This being primarily based upon consideration that:

- Mining activities are well known managed, documented and reported from the area
- Company internal records have to date shown no significant detrimental impacts related to mining

The majority of issues raised during compilation of this EMP are similar to those raised during that for Advanced Sampling, despite mining being conducted with greater intensity over a longer time period. As discussed earlier in section 1.5.2, the EMPR for Advanced Sampling was discussed with representatives of the Ministry of Fisheries and Marine Resources, the 10-Ton Quota Holders, and the Namibian Rock Lobster Fishing Association. It was also officially presented for comment at the Lüderitz Forum and at a Forum Steering Committee meeting. The EMPR for Advanced Sampling was approved by MME, MFMR and MET.

Copies of this report were circulated in late June to key government and marine industry IAPs for comment (see **Appendix 3**). Two copies of the draft report were left at the MFMR offices in Lüderitz, Swakopmund and Windhoek, and MME in Windhoek, and advertisements were placed in the Lüderitz *Buchter News*, *Namib Times* and *Die Republikein* informing readers of its availability for comment for a period of 14 days. The Namibian Nature Foundation was also informed of its availability for comment. All comments and issues raised by IAPs, including attendees of the Symposium on Co-management of Marine Resources held in Lüderitz between 21 and 24 June 2000, that are relevant to diamond mining have been integrated into this report. The EMPR process is indicated in a flow chart in **Figure 3**.

Issues of concern to IAPs are summarised below.

4.2 Issues Raised by IAPs to Date

The following is a list of the main issues raised by IAPs concerning mining and sampling activities. This includes issues raised during the development of the EMP for Advanced Sampling (1998) and those raised during compilation of this report. A list of IAPs involved in this study is provided in **Appendix 3**.

- Lüderitz residents and representatives of the fishing industry claim that there has been **inadequate and inappropriate communication** and information about sampling and mining activities from the mining industry and government.
- The fishing industry representatives and MFMR are concerned about the **potential impact of mining on rock lobster**. Issues of concern in relation to this include:
 - a) the direct destruction, by mining, of rock lobster habitat and benthic organisms;
 - b) removal/ "sucking up" of rock lobster, particularly breeding females,
 - c) direct and indirect disturbance of reefs in offshore areas, which appear to be an important area for male lobsters
 - d) direct & indirect harm to marine life through alteration of water quality by the tailings plume
 - e) permitting of mining in rock lobster sanctuaries, and within migration areas
 - f) the potential effect on rock lobster of release of H₂S gases during mining through sulphidic muds
 - g) the potential impact on benthic organisms from mobile excavated boulders in areas outside the mining area. [This is considered to be highly unlikely because there is no energy source sufficient to move rocks around, as ambient current velocities are low and wave energy dissipates rapidly with depth].
- **Lack of fishing industry involvement** / contribution to impact assessments and management planning.
 - There are concerns by representatives of the fishing industry that **mining vessels may obstruct access to fishing areas**.
- Representatives of the fishing industry would like to see **limits on the number of mining vessels** allowed to operate.
- MFMR have suggested that **tracking devices be fitted** to ALL fishing and mining vessels in the region to provide a real time record of location. This could be used to assist in planning activities, and resolving disputes between the two industries.
 - **Greater need for monitoring and evaluation of impacts** by mining companies, and control by government. Diamond Fields has undertaken in-depth monitoring throughout its sampling phases, retained and ⁵submitted environmental compliance records for ML 111 since the initiation of operations.
- **Suggestions for monitoring**, from MFMR representatives in Lüderitz, are:
 1. take regular CTDO samples throughout the water column at varying distances around the mining vessels to understand the distribution and impacts of mining sulphidic muds on sea oxygen levels [This is to be addressed in the proposed investigations that will define the actual environmental risks of disturbing sulphidic sediments].
 2. undertake sediment trap studies on the reefs on the east and west sides of the mining areas before and during mining to gain an understanding of seabed sedimentation. [Note: this is not

feasible in areas such as Marshall Fork where currents exceed 20cm/s and at depths of less than 40m. In this environment sediment traps will yield biased estimates].

3. take regular video footage of reefs near mining areas on regular basis to detect increases in sedimentation and impacts on rock lobster and gobies. [This has been recommended in the EMP].
- **All data collected during monitoring** should be sent to MFMR for information as soon as it is interpreted.
 - Of great concern is the apparent **lack of control of marine pollution and risk of oil spills**, and the impact of this on Lüderitz Bay, particularly on mariculture. Associated with this is concern over the inability of the Lüderitz port to adequately respond to and handle an oil spill. In addition, a further concern is the lack of a bilge water disposal facility in Lüderitz port, which encourages the disposal of bilge water at sea, in contravention of MARPOL regulations which Namibia intends to ratify.
 - **Operations involving oil loss** (mining tool operation and bunkering) should not be done, particularly during winter months, in the vicinity of islands or wetlands. This is to prevent destruction of sensitive habitat by oil loss/ spills. (Lüderitz Bay, Possession, Mercury & Ichaboe Islands are listed as having an Important Bird Area status of globally threatened).
 - Mining companies have indicated that each vessel should **monitor weather conditions at sea** to predict and define "operational limitations" – so that before set criteria are exceeded work can be stopped to prevent high risk to human life, machinery and the vessel, and to prevent major pollution events. Wave, swell and wind data collection should be improved and e-mailed regularly to MFMR (request from: knoli-peard@mfmr.gov.na).
 - Concern was raised by the Lüderitz Town Council about the **lack of an acceptable waste site** for domestic waste and the lack of a hazardous waste site in the Lüderitz area.
 - Concern was raised by the Lüderitz Town Council about the **lack of record keeping** on the amount and type of waste unloaded from vessels, which is dumped on the municipal landfill site.
 - **Suppliers and contractors** should have environmental performance and quality control conditions imposed on them by DFN.
 - MFMR have requested that all **aircraft** avoid all islands, seal colonies, and wetlands by 1nm (1.852km)
 - MFMR would like to take office, vessel & mining **managers to visit an island** (between November & April) to demonstrate the sensitivity of these environments.
 - There are fears that **shipwrecks** in the area may be destroyed.
 - There is **inadequate direct contribution** by mining companies to the Lüderitz economy and concerns exist regarding **benefits to employees** in accordance with the Labour Act.

- There is a need for an assessment of the **cumulative impacts** of increasing mining operations.

Effective implementation of the EMP (section 7) will address the concerns defined above. In **Appendix 4**, each of these issues is cross-referenced to the relevant part of the EMP (contained in section 7) that stipulates the management actions required to address them.