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Arcus GIBB (Pty) Ltd
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gfechter@gibb.co.za

Dear Ms Fechter

Ref: 14/12/16/3/3/1/526

Foskor: Proposed Rock Phosphate Storage Facility
Ptns 55 and 56 of Erf 5333, Richards Bay

Draft Basic Assessment Report:

The following comments are submitted by WESSA and Coastwatch, a project of WESSA KZN (hereafter referred to collectively as WESSA) and are compiled after review of the report only. We did not request copies of the appendices and we are satisfied that the issues of our concern have been considered and mitigation comprehensively covered in the report.

- Cumulative Impacts – Loss of Wetland

WESSA's main area of concern pertains to the acknowledged contribution the proposed development of a rock phosphate storage facility will make to, in particular, the loss of wetland habitat and cumulative impacts on the wetland ecosystems in Richards Bay. Mitigation is proposed to reduce the impacts of development on the remaining area of wetland, on and off the site, however the loss of the system (and habitat) albeit considered small, has not been taken into consideration.

While the City of uMhlatuze has adopted an Environmental Services Management Plan WESSA is not confident that the ecosystems which provide the goods and services are secured and there is apparent ongoing infringement into, and impacts on, the 'service providers'.

- Impacts on Wetlands

WESSA will support Ezemvelo KwaZulu-Natal Wildlife in its requirements for the development of Portions 55 and 56 of Erf 5333 and we trust that the revised designs aimed at reducing the impacts on the southern wetland system which forms part of a much larger system flowing into swamp forest and the Manzanyama system, and Richards Bay Harbour, both of which support critically important biodiversity, are acceptable to the organisation. The revised design features discussed at the meeting held between stakeholders on 4 June 2012 which aim to minimize the potential impacts on hydrology, drainage and the wetland systems are supported by WESSA, the revised design being as follows –

- The bunker will be constructed on concrete pilons driven or poured into the ground, which will therefore not restrict the underground movement of water,
- The new eastern drainage channel will be provided with a permeable floor, energy dissipating features along the route of the channel and an energy dissipating structure at the inlet to the southern wetland,
- The storm water culvert under the road will be a box culvert type provided with a permeable floor,
- The base of the access road that traverses a small portion of the southern wetland will be broken rock rather than soil infill to allow water to permeate more freely · The roof of the bunker will not be provided with gutter, but rainwater will fall off the roof into a trench filled with rock surrounding the building. This is to allow the water to recharge the groundwater and wetlands. This return of water into the local water table will in turn feed the southern system via indirect inputs,
- A 'first flush catch pit' will be provided at the outlet of the storm water system for the parking area to contain sediments and contaminants and prevent these from spilling into the southern wetland,
- Where feasible, the designs would also include more natural free runoff, particularly from areas that will remain undeveloped.

The additional storm water management recommendations and mitigation measures to prevent erosion and sedimentation of the systems, as advised by Mullins (2010), are set down as requirements in the environmental management programme. We trust that the road infringing the southern wetland will incorporate specific design features to reduce its impact.

- Air Quality

A dust control system aimed at reducing fugitive dust emissions is proposed and WESSA supports the regular monitoring of the rock phosphate facility with audits to identify and address trends which may have a negative contribution to ambient conditions.

Thank you for the information.

Yours sincerely



Carolyn Schwegman
EIA Co-ordinator, WESSA KZN Region