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**AFRIFORUM CONCERNED ABOUT INSUFFICIENT ENVIRONMENTAL IMPACT ASSESSMENT FOR MINE NEXT TO RIETVLEI NATURE RESERVE**

By[AfriForum](https://afriforum.co.za/en/author/ischkevaneeden/)31/08/2023

The civil rights organisation AfriForum is concerned about the extremely flawed environmental impact study that supports an application for environmental authorisation for the mining of coal at an existing clay mine, which borders the Rietvlei Nature Reserve in Pretoria.

The clay mine’s existing mining right only applies to clay. However, after it came to the attention of the Department of Mineral Resources and Energy that coal reserves that had been exposed during normal clay mining operations were being mined without authorisation, the Department directed the mine to rectify this transgression by retrospectively applying for environmental authorisation. This application is subject to a basic assessment process and the Draft Basic Assessment Report is currently available for public comment.

Marais de Vaal, AfriForum’s advisor for Environmental Affairs, says AfriForum is concerned about the extremely flawed Draft Basic Assessment Report compiled by the environmental assessment practitioner. “The environmental assessment practitioner has a legal and professional duty to present factually correct information. The Draft Basic Assessment Report is riddled with inconsistencies and it seems as if parts of the text have been copied from other reports without any adaptation. If this is really the case, it is plagiarism and fraud,” says De Vaal.

Some examples of this that can be highlighted include:

* In one place it is said that an application is being made for environmental authorisation and a water use licence, while in another there is mention of a waste management licence.
* In one place it is said there are five years of coal reserves, while in another it is said there will be mining for 30 years.
* In one place it is clearly stated that the mine is already operational and therefore no construction will take place, while the environmental impact during the construction phase is discussed pertinently in another.
* Reference is made to provincial legislation of the Northern Cape.
* Reference is made to activities that take place downstream of the Marico Bosveld Dam and Molatedi Dam in the Marico River.
* Essential factors that must be taken into account, such as the cumulative impact of mining in the environment, are discussed only in overview without any further analysis.

De Vaal further says that this is a worrying trend that is being noticed in more and more applications for environmental authorisation. The danger is that the competent authority’s decision to grant authorisation or not will be based on unfounded facts if the public does not notice such defects in time and object to them.

AfriForum has already registered as an interested and affected party to stay informed throughout the application and thereby make sure that the public’s objections are based on the correct facts. “The rumours about a planned coal mine bordering the Rietvlei Nature Reserve that recently circulated on social media are simply stirring up emotions and it is not helpful to assess this issue objectively and rationally,” concludes De Vaal.

AfriForum encourages the public to get involved and to also register as interested and affected parties to voice their objections. The Draft Basic Assessment Report can be accessed on the environmental assessment practitioner’s [website](https://licebo.co.za/projects/public-review-documents).

A public participation meeting will take place on Friday 8 September at 11:00 at the Pretoria Sailing Club at Rietvlei Dam.