



NATIONAL WATER RESOURCE STRATEGY 2

Mining Industry Response

Content of the Presentation

1. Introduction
2. General Comments
3. NWRS – Specific Comments
4. Recommendations

Introduction

- The Chamber of Mines (COM) supports the objectives of NWRS 2 and the strategic direction it provides to holistic water resources management in South Africa.
- The mining industry is affected by the threat of water scarcity, thus keenly interested in the development of a fair strategy that echoes the principle of equitable water resource management.
- The mining industry is encouraged to observe a developmental water management (DWM) approach taken in this strategy.
- The COM continues to forge closer relations with DWA to develop other water related initiatives in support of the implementation of the NWRS2 such as WCWDM, AMD management, regulation etc

General Comments

- A legal instrument to plan, develop and manage water resources in an integrated manner, hence this should be demonstrated in the document through a plan with deliverables and timeframes.
- The NWRS2 should be based on the outcomes of the review/ assessment of NWRS 1.

General Comments

- The strategy fails to provide strategic direction towards the challenges faced by municipalities i.e. pollution, capacity, etc.
- The implementation of NWRS2 is the sole responsibility catchment management agencies (CMAs). Thus, lack of progress in the formation of CMA's is a concern.
- Furthermore, there is a 'high level' concerted effort by the industry and government to address the plight of acid mine drainage and this is not reflected in the strategy.

NWRS, specific comments

- From a business perspective, water is considered as a material issue for a sustainable and viable mining activities. Thus we dispute the assertions made in the strategy alleging that business lacks commitments in water resources management
- It is also mentioned that the NWRS 2 is aligned with other national development strategies, however, this is not the case in practice.
- Water Governance, The DWA need to effectively use the water sector leadership group to overcome planning challenges alluded to in the draft strategy.

NWRS, specific comments

- WCWDM, a dedicated programme for setting targets for sectors is to undertake a baseline assessment. The focus should be on developing measures for achieving water use efficiency and not target.
- A need to strengthen the implementation of certain provision of the National Water Act to effectively realize the aspirations highlighted in this core strategy

NWRS, specific comments

- One of the actions for the protection of water resources is a dedicated programmes on AMD, there should be an appreciation of existing programmes.
- The process of the development of water sector investment framework is acknowledged. However, the industry no knowledge of the finalised framework document.
- The adequate capacity for the implementation of the NWRS is critical. Thus, government needs to detail how the latter capacity will be attained in the short, medium and long term.

Recommendations

- The Chamber recommends that the strategy be revised to include objectives supported by implementation instruments, in a form of measurable action plans with clear accountabilities and time frames for implementation, especially in the following areas of concern by the mining industry:
 - Water use licensing/authorisation
 - Security of water supply for the mining industry
 - Intergovernmental approach to management of environmental legacies
 - Establishment of Catchments Management Agencies
 - Integrated Planning (water planning aligned with developmental plans i.e. mining
 - Capacity of government to administer the National Water Act and its strategy
