

**NAMLI EXPLORATION AND MINING (PTY) LTD,
MINING PERMIT APPLICATION,
NAMAKWA DISTRICT,
NORTHERN-CAPE PROVINCE**

COMMENTS AND RESPONSE REPORT

REF NO: NC 30/5/1/3/2/10950 MP

JULY 2022



NOTIFICATION OF STAKEHOLDERS AND I&AP'S OF THE MINING PERMIT APPLICATION

COMMENTING PERIOD: 29 APRIL – 07 JULY 2022

The initial public participation entailed the placement of Afrikaans and English site notices at Goodhouse, Violsdrif and Steinkopf. Site notices were also delivered to the ward councillor of Concordia. The project was advertised in the Plattelander and the Gemsbok, and the ward councillors (and some community members) of wards 1 - 3, as well as the acting municipal manager of the Nama Khoi Municipality were supplied with introductory pamphlets regarding the application. In accordance with the timeframes stipulated in the EIA Regulations of December 2014 (as amended) the Draft Basic Assessment Report (DBAR) was compiled and was distributed for comment and perusal to the I&AP's and stakeholders listed below. A hard copy of the document (DBAR & EMPR), with an Afrikaans summary, was placed at the Steinkopf Library for ease of reference. A 30-day commenting period, that ended on 07 July 2022, was allowed for perusal of the documentation and submission of comments. A virtual meeting was also held with the acting municipal manager from the NKLM on 06 July 2022.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr L Modise	Department of Agriculture, Environmental Affairs Rural Development and Land Reform - Kimberley	03 June 2022	No Comments Received
Mr Darren Engelbrecht	Department of Agriculture, Environmental Affairs Rural Development and Land Reform - Springbok	03 June 2022	No Comments Received
Mr S Mabilo	Department of Economic Development and Tourism - Kimberley	03 June 2022	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr J van Schalkwyk	Department of Economic Development and Tourism - Upington	03 June 2022	No Comments Received
Mr. Kholekile Nogwili	Department of Roads and Public Works - Kimberley	03 June 2022	No Comments Received
Me Van Hinsbergen	Department of Roads and Public Works - Springbok	03 June 2022	No Comments Received
Mr A Abrahams	Department of Water and Sanitation - Kimberley	03 June 2022	No Comments Received
Mr Shaun Cloete	Department of Water and Sanitation - Upington	03 June 2022	No Comments Received
Mr Zolile Albanie	Department of Labour – Kimberley	03 June 2022	No Comments Received
Me Caren Engelbrecht	Department of Labour – Springbok	03 June 2022	No Comments Received
Mr Christiaan Fortuin	Namakwa District Municipality	03 June 2022	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Deon Magerman	Nama Khoi Local Municipality	03 June 2022	06 July 2022
<p>The NKLM was supplied with an introductory pamphlet and project map regarding the proposed project on 03 May 2022. Following this, Mr D Magerman, as acting municipal manager, was invited to an introductory virtual meeting on 29 June 2022, that was in the end rescheduled for 06 July 2022. Refer to Appendix F2 for a copy of the meeting presentation and minutes of the meeting.</p>			
<p>Summary of the meeting discussions held on 06 July 2022.</p> <p>Following the introduction of the project to the meeting, Mr Magerman raised two points of interest:</p> <ol style="list-style-type: none"> 1. An official letter must be signed with the council as the earmarked property is council land and rent is usually charged for the surface rights. <p>Ms. Fouche enquired who the correct contact person would be to contact in this regard as Mr. Raymond (Community Leader) as well as Mr. Warren Britz (Ward Councilor) were already informed of the project. It was decided that the agreement letter will be forwarded to the municipal manager (Mr. Magerman as acting municipal manager) who will then present it to the council for their consideration. Mr. Mdingi will visit Springbok in two weeks' time and will continue the land use agreement discussions with Mr. Magerman and the council.</p> 2. A SPLUMA application will be applicable to this application in addition to the other authorizations to be approved by the DMRE. It was mentioned that as the area has been mined previously it may assist the outcome of the application. Mr. Magerman advised that he also deals with the town planning applications as he is acting municipal manager. <p>Ms. Fouche confirmed that a town planner was already contacted in this regard and enquired whether a full application will be needed, or if a temporary departure would be considered as the mining permit application will only have a lifespan of maximum five years. Mr. Magerman said that a final decision on the type of application will be taken once the town planner contacts the municipality. It was agreed that the land use application process will commence as soon as possible (with Mr. Magerman being the initial contact) to prevent a situation where the land use application keeps the activity from continuing once the mining permit was received.</p> 			

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In addition to the above, Mr. Magerman noted that the municipality supports development in the area if all the required processes are followed.			
A copy of the minutes and attendance register was emailed to the Mr Magerman and Mr Mdingi (attendees) on 07 July 2022. No additional comments were received that could be incorporated into the FBAR.			
Me M du Toit	Regional Land Claims Commission Northern Cape	03 June 2022	07 July 2022
The Office of the Regional Land Claims Commissioner: Northern Cape confirmed that no land claim appears on their database in respect of the property.			
Mr. Peter Hibberd	SAFTA (Pty) Ltd	03 June 2022	No Comments Received
Mr Khahliso Makale	Eskom	03 June 2022	No Comments Received
Me N Higgitt	South African Heritage Resource Agency	03 June 2022	01 July 2022
Summary of the interim comments received from SAHRA on 01 July 2022:			
<p><i>".....The report states that the proposed development area is located in an area of insignificant sensitivity for palaeontological resources, however the SAHRIS PalaeoSensitivity map depicts the development footprint to be located in an area of unknown sensitivity for palaeontological resources.....The SAHRA Archaeology, Palaeontology and Meteorites (EPM) Unit requests that a desktop PIA be conducted for the proposed development as the footprint is located</i></p>			

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TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<i>in an area of unknown sensitivity for palaeontological resources as per the SAHRIS PalaeoSensitivity Map. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA Regulations in order to comply with this comment.”</i>			
<p>A desktop PIA (Appendix H2) was compiled by Prof M Bamford and incorporated into the HIA attached as Appendix H1. The desktop PIA was also loaded to the SAHRIS system on 06 July 2022, and Me N Higgitt was informed of its availability on the same day.</p> <p>A notification was also sent (06 July 2022) to all the stakeholders and I&AP informing them of SAHRA’s request and the outcome of the PIA. Refer to Appendix F2 for proof of the correspondence in this regard.</p>			

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Michael Raymond Cllr Warren Britz	Community of Steinkopf c/o Nama Khoi Local Municipality & Cllr Britz	03 June 2022	No Comments Received
<p>At the onset of the project, Greenmined was informed that Mr S Cloete acts as the community representative of Steinkopf. Subsequently, Mr Cloete asked the EAP to introduce the project to Mrs C Gertze during a meeting. A representative of the Applicant, Mrs Gertze and the EAP met on 29 April 2022 at the Nama Khoi municipal point in Steinkopf. Mrs Gertze was supplied with a copy of the introductory pamphlet and the project was pointed out in relation to the surrounding towns and properties. Matters such as possible work opportunities, benefits to the community, and water resources were discussed, and Mrs Gertze requested to be registered as I&AP on the project. Mrs Gertze further requested that Mr M Raymond be added to the contact list as community representative.</p>			

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>Both Mrs Gertze, and Mr Raymond were added to the registered I&AP list and were invited to comment on the DBAR. No comments were received that could be incorporated into the FBAR.</p> <p>Afrikaans and English site notices were placed at the notice board of the Steinkopf Library on 29 April 2022, and a hard copy of the DBAR, with an Afrikaans summary, was available at the Steinkopf Library.</p>			
<p>The project was telephonically introduced to Cllr. Britz, upon which an introductory pamphlet supported by project maps were emailed to him on 03 May 2022. No comments were received from the councillor that could be incorporated into the FBAR.</p>			
Cllr Susan Cloete	Community of Vioolsdrif c/o Cllr Cloete	03 June 2022	No Comments Received
<p>Cllr S Cloete was identified as the ward councillor of Ward 2 of which Vioolsdrif forms part. Cllr Cloete was unfortunately not available to meet on the 29th of April 2022, however the project was telephonically (WhatsApp) introduced to her, and she was supplied (03 May 2022) with a copy of the introductory pamphlet and project maps for her perusal. Cllr Cloete was also invited to comment on the DBAR. No comments were received that could be incorporated into the FBAR.</p> <p>Afrikaans and English site notices were placed at the Brug Kafee Mini Market of Vioolsdrif on 28 April 2022.</p>			
Cllr Warren Britz	Community of Goodhouse c/o Cllr Britz	03 June 2022	No Comments Received
<p>The Goodhouse area falls within the jurisdiction of Cllr Britz of Ward 3. As mentioned earlier, Cllr Britz was supplied with the introductory pamphlet and project map regarding the proposed project on 03 May 2022, as well as invited to comment on the DBAR. No comments were received that could be incorporated into the FBAR.</p>			

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Afrikaans and English site notices were placed at the Camel Rock Wholesale & Take Aways in Goodhouse on 28 April 2022.			
Cllr Charlotte Visser	Community of Concordia	3 June 2022	29 April 2022
<p>Cllr C Visser was identified as the ward councillor of Ward 1 of which Concordia forms part. Greenmined and a representative of the Applicant met with Cllr Visser and two community members on 29 April 2022 at the Nama Khoi municipal point in Concordia. The project was introduced to the meeting and the introductory project pamphlet and project maps were distributed. The community members enquired how the project will benefit the local people and voiced their concern regarding mining applicants that are from areas outside the community. It was noted that mining companies enter these areas, and subsequently abandon the unrehabilitated mines as the companies does not have an interest in the surroundings. It was however, noted that Concordia is an adjacent community, and that the final comments should come from the Community of Steinkopf. Cllr Visser confirmed that even though the title deed notes the Community of Concordia as the landowner of Steinkopf No 22, this was no longer the case, and that the property was transferred to the Community of Steinkopf. Cllr. Visser requested that Mr D Magerman from the Nama Khoi Municipality (Springbok) also be informed of the project and be added as registered stakeholder on the project. Cllr Visser undertook to place the site notices at the municipal offices (Concordia) once she discussed the project with Mr Magerman.</p> <p>The meeting was informed of the possible employment opportunities, although this would most likely benefit the Community of Steinkopf instead of Concordia. Mr Magerman was registered as the acting municipal manager of Nama Khoi Local Municipality, and Cllr Visser was supplied with an Afrikaans and English site notice to be placed at the municipality (Concordia). Cllr Visser was also registered as I&AP on the project and invited to comment on the DBAR. No comments were received that could be incorporated into the FBAR.</p>			
Mr De Wet	Verde Bitterfontein (Pty) Ltd	3 June 2022	No Comments Received

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Van Schalkwyk	Nigramoep No 136	3 June 2022	No Comments Received
Mr K van Zyl	Interested Party	-	07 June 2022

Mr Van Zyl directed the following comments to the DMRE:

The mining application NC 30/5/1/3/2/10950 MP in the name of Namli Exploration and Mining (Pty) Ltd that was accepted on a 5Ha portion of the farm Steinkopf 22 for the mining of Lithium ore (Li), Nickel (Ni), Manganese (Mn), Lead (Pb), Copper (Cu), Iron (Fe), Cobalt (Co), Gold (Au), Zinc (Zn), Silver (Ag), tungsten (W), Uranium (U), Beryllium (Be), Rare Earths, Tantalum (Ta):

1. Does not overlap with prospecting right NC 30/5/1/1/2/12169(940)PR in the name of Southern African Lithium and Tantalum Mining (Pty) Ltd. Representative: Pieter Hibbert...
2. Does not overlap with mining right NC30/5/1/2/2/10179MR in the name of R.E.D Graniti S.A (Pty) Ltd. Representative: Barend André Laubscher...
3. Is in conflict with prospecting right NC30/5/1/1/2/11823PR in the name of Horomela Hole Transport Services 1228 (Pty) Ltd t/a Horomela Mining Investment & Resources on a 176 357.9 Ha portion of the farm Steinkopf 22 for the mining of Nickel (Ni), Manganese (Mn), Lead (Pb), Copper (Cu), Tantalum (Ta), Uranium (U), Beryllium (Be), Zinc (Zn), Silver (Ag), Tungsten (W), Rare Earths, and Lithium ore (Li)

The DMRE responded to the comments of Mr Van Zyl as listed below:

The prospecting right held by Horomela has been ceded to Namli and Namli has applied in terms of section 102 to exclude the Mining permit area from their principal right.

SUMMARY OF PUBLIC PARTICIPATION PROCESS

The I&AP's were informed of the project through:

- ❖ Advertisements in two local newspapers (in Afrikaans and English);
- ❖ On-site notices (Afrikaans & English) that were placed at public places;
- ❖ Introductory pamphlets (Afrikaans & English);
- ❖ Invitations to comment on the DBAR (hard copy available at Steinkopf Library);
- ❖ Virtual meeting held with the acting municipal manager of the Nama Khoi local municipality; and
- ❖ Telephonic/personal discussions held with the relevant ward councillors and some community members.

During the public participation process the only written comments were submitted by Mr Van Zyl who was responded to by the DMRE, as well as SAHRA. The PIA requested by SAHRA was submitted to them and the findings of the report confirmed that the area is of no palaeontological concern (as mentioned in the DBAR). The Applicant will remain in contact with the NKLM and community council regarding the signing of a land use agreement.

See attached as Appendix F2 proof of the correspondence with the I&AP's and stakeholders during the public participation process.

-END OF COMMENTS AND RESPONSE REPORT-