

**PROPOSED PROSPECTING RIGHT OVER VARIOUS
PROPERTIES IN THE NAMAKWA ADMINISTRATIVE
DISTRICT OF THE NORTHERN CAPE**

DEPARTMENT REFERENCE NUMBER:

NC 30/5/1/1/2/14344 PR

COMMENTS AND RESPONSE REPORT

AUGUST 2025



NOTIFICATION OF STAKEHOLDERS AND I&AP'S OF THE PROSPECTING RIGHT APPLICATION

COMMENTING PERIOD: 19 MAY – 20 JUNE 2025

During the public participation process the stakeholders and I&AP's were informed of the project by means of draft basic assessment notices that were sent directly to the contact persons. An Afrikaans and English advertisement were placed in the Plattelander Newspaper on 16 May 2025. Afrikaans and English on-site notices were placed at the Grasvlakte / Eksteensfontein turnoff from the R385, Wolfberg turnoff from the R385, at the Port Nolloth Public Library, and Steinkopf Public Library. The advertisements, draft basic assessment notice, and on-site notices invited the recipients to register/comment on the project on/before 20 June 2025. The following table provides a list of the I&AP's and stakeholders that were informed of the project.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr S Adams	Namakwa District Municipality	19 May 2025	No Comments Received
Mr J Swartz	Nama Khoi Local Municipality	19 May 2025	No Comments Received
Mr A Polori	Nama Khoi Local Municipality Ward 8	19 May 2025	No Comments Received
Mr JG Cloete	Richtersveld Local Municipality	19 May 2025	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mrs T Sonamzi	Richtersveld Local Municipality Ward 3 Councillor	19 May 2025	No Comments Received
Mr B Fisher Mr Cloete	Department of Agriculture, Environment Affairs, Rural Development and Land Reform - Kimberley	19 May 2025	No Comments Received
Mr D Engelbrecht	Department of Agriculture, Environment Affairs, Rural Development and Land Reform - Springbok	19 May 2025	No Comments Received
Mr T Mabija Ms U Ngomane	Department of Economic Development and Tourism - Kimberley	19 May 2025	No Comments Received
Mr J van Schalkwyk	Department of Economic Development and Tourism - Upington	19 May 2025	No Comments Received
Mr K Nogwili	Department of Roads and Public Works	19 May 2025	No Comments Received
Me R van Hinsbergen	Department of Roads and Public Works - Springbok	19 May 2025	No Comments Received
Mr A Abrahams	Department of Water and Sanitation - Kimberley	19 May 2025	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr S Cloete	Department of Water and Sanitation - Upington	19 May 2025	No Comments Received
Mr Z Albanie	Department of Labour - Kimberley	19 May 2025	No Comments Received
Ms R van Wyk	Department of Labour - Springbok	19 May 2025	No Comments Received
Mrs N Abrahams	SANRAL	19 May 2025	No Comments Received
Ms M du Toit	National Department of Agriculture, Land Reform and Rural Development	19 May 2025	No Comments Received
Mr Makale	ESKOM	19 May 2025	No Comments Received
Mrs N Goltz	National Protected Area Expansion Strategy Team Northern Cape	19 May 2025	No Comments Received
Case Officer Ms B Motsodisa	South African Heritage Resources Agency	19 May 2025	24 June 2025

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p><u>Interim Comment received from case officer Boitshepo Motsodisa on 24 June 2025:</u></p> <p>Greenmined Environmental (Pty) Ltd has been appointed by Strata Energy Minerals & Resources (Pty) Ltd to undertake an Environmental Authorisation (EA) Application for proposed prospecting activities of base and industrial minerals including Copper (Cu), Zinc (Zn), Lead (Pb), Silver (Ag), Lithium (Li), Baryte (BaSO₄), Sillimanite-corundum (Al₂SiO₅), Wolframite (W)/Tungsten, and Feldspar (Fsp) on 21 217 Ha located on farms Tusschen-In No. 143, portion 1 and remaining extent of Aardvark No. 164, Steenbok No. 165, and Farm No. 166 (Gifkop) in the Namakwa Magisterial District, Northern Cape Province.</p> <p>A Draft Basic Assessment Report (DBAR) and Environmental Management Programme report (EMPr) has been submitted in terms of the National Environmental Management Act, 1998 and the National Environmental Management Waste Act, 2008 in respect of listed activities that have been triggered by applications in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) (as amended). The proposed prospecting activities will consist of non-invasive (desktop studies, field mapping, geophysical surveys) and invasive (exploratory drilling) components. No bulk sampling will take place, temporary infrastructure including mobile containers and chemical ablutions will be constructed.</p> <p>As evident in the previous image the proposed PR footprint does not extend into any protected areas. The Richtersveld World Heritage Site and the Nababeep Protected Area lays ±25 km north of the farm Tusschen- In No 143, while the Richtersveld National Park is ±21 km north-west of Aardvark No 164 and Steenbok No 165 with the nearest point is ±13 km from the park. The farms Aardvark No 164, Steenbok No 165 and Farm No 166 (Gifkop) are also within the National Protected Area Expansion Strategy (NPAES) area.</p> <p>Beyond heritage has been appointed by Greenmined Environmental (Pty) Ltd to provide heritage specialist input into the EA process in terms of section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). <i>Kraljevic, L. 2025. Heritage Impact Assessment for the Prospecting Application on 21 217.1756 Hectares near Steinkopf in the Northern Cape.</i></p> <p>The site was subjected to a desktop study. It is recommended that this will be done when the actual exploration (invasive prospecting activities) localities are fixed.</p> <p>The various farms earmarked for prospecting are situated within a larger sphere of significant archaeological sites. Stone Age sites and artefacts can be expected across the entirety of the landscape with more significant sites clustered expected on rocky outcrops, hills, and watercourses. Low density scatters relating to the ESA, MSA, and MSA can also be expected in flat plains.</p>			

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<p>The HIA recommends as follows:</p> <ul style="list-style-type: none"> Once the drill sites have been confirmed these areas have to be subjected to a heritage walk down, this should be conducted prior to the commencement of prospecting activities; Drill sites must be kept as close as possible to existing roads in order to minimise the impact on the landscape; Focal points on the landscape like rocky outcrops or pans must be avoided as far as possible as these areas could be sensitive from a heritage point of view; Monitoring of the Project area by the ECO during the exploration phase for heritage and palaeontology chance finds, if chance finds are encountered to implement the Chance Find Procedure. <p>Prof. Marion Bamford has been appointed to provide Palaeontological specialist input.</p> <p><i>Bamford, M. 2025. Palaeontological Impact Assessment for four prospecting right applications near Steinkopf, Namaqualand, Northern Cape Province</i></p> <p>The prospecting sites lie on the non-fossiliferous metamorphosed igneous rocks of the Namaqualand-Natal Metamorphic Suite and Quaternary sands and alluvium. No fossils are known from this region.</p> <p>The PIA recommends the following;</p> <p>There is a very small chance that fragments of transported fossils may occur in the sands and alluvium so a Fossil Chance Find Protocol should be added to the EMPr.</p> <p><u>Interim Comment</u></p> <p>The SAHRA DAU notes the submitted Heritage Reports. However, a field-based study must be undertaken to identify no-go areas and areas to avoid.</p> <p>Further comments will be issued upon receipt of the above requested report and a revised DBAR and EMPr that incorporates the results of the specialist assessment. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations in order to address this comment.</p>			

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Should you have any further queries, please contact the designated official using the case number quoted above in the case header.			
<p>Greenmined responded on 01 July 2025 as follows to the SAHRA comments:</p> <p>“.....We note SAHRA’s request that a field-based heritage assessment be undertaken to identify no-go areas and areas to avoid. However, we respectfully submit that the proposed field-based heritage study should be conducted <u>after</u> the approval of the Prospecting Right, but <u>prior</u> to any invasive prospecting, for the following reasons:</p> <ol style="list-style-type: none"> The Current Application is for a Prospecting Right, not Mining <p>The proposed activities are limited to prospecting, with the majority of the early-phase work being non-invasive (desktop interpretation, remote sensing, surface mapping).</p> <p>The field-based study will specifically inform site selection for invasive activities (e.g., drilling), which are only triggered during later phases and on a far more limited footprint. At this stage, exact drilling locations cannot yet be confirmed, making it impractical and inefficient to conduct a field-based heritage survey over the entire application area (~21,217 ha).</p> Field-based Study is Already Committed to in the DBAR <p>The submitted DBAR and EMPr already make explicit provision for a detailed field-based heritage study to be undertaken prior to any invasive prospecting. This requirement is listed as a mandatory pre-condition to the commencement of Phase 4, and the results will directly inform:</p> <ul style="list-style-type: none"> Site-specific no-go areas, Avoidance measures, Mitigation actions, and Prospecting layout adjustments. 			

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<p>3. Environmental Authorisation Conditions Can Secure Compliance</p> <p>Should the competent authority (DMPR) grant the Environmental Authorisation, it is proposed that the requirement for a field-based heritage study be included as a condition of the Environmental Authorisation.</p> <p>This would ensure regulatory enforcement and that no invasive activity may commence unless the following has occurred:</p> <ul style="list-style-type: none"> • Completion of the heritage field survey, • Submission of the findings to SAHRA, and • Incorporation of mitigation measures into the final drill plan. <p>4. Resource Efficiency and Best Use of Specialist Input</p> <p>Conducting a field-based survey over such a large area, in the absence of confirmed focus zones for drilling, is not only cost-prohibitive but may also result in duplicated or wasted effort. Delaying the fieldwork until after right approval, but before site disturbance, allows the specialist to focus precisely on those portions of the site where disturbance is proposed — as defined by the confirmed exploration plan.</p> <p>5. Alignment with National Practice for Prospecting Applications</p> <p>The proposed approach aligns with national norms and current practice for prospecting applications, where field-based heritage studies are most commonly required prior to ground disturbance, rather than prior to right approval.</p> <p>Formal Undertaking</p> <p>To formally support this approach, a signed undertaking by the Applicant is appended to this response, confirming that:</p> <ul style="list-style-type: none"> • A field-based heritage impact assessment will be commissioned prior to any invasive prospecting. • The findings of the study will be submitted to SAHRA for review and approval before any ground disturbance. • All recommendations and no-go areas identified by the specialist will be fully incorporated into the final drill plan to be submitted to the DMPR for approval and implemented on site. 			

STAKEHOLDERS			
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<p>In Summary</p> <p>In light of the above, we respectfully request that SAHRA allow for the field-based heritage study to be undertaken following the approval of the Prospecting Right, but prior to the commencement of invasive prospecting activities, as already committed to in the BAR and EMPr. We remain fully committed to ensuring compliance with the National Heritage Resources Act (Act 25 of 1999) and to working in close consultation with SAHRA throughout the process.</p> <p>This correspondence, SAHRA's response hereto (if received prior to submission of the Final BAR & EMPr to the DMPr), as well as all future heritage-related work to be undertaken, will also be shared with the DMPr for their records and consideration.</p> <p>We kindly request SAHRA to consider this proposal and provide us with a response by 15 July 2025 as the final BAR & EMPr need to be submitted to the DMPr on or before 25 July 2025. Should no response be received from SAHRA by 15 July 2025, it will be assumed that the proposed approach has been accepted, unless otherwise indicated."</p>			
<p>SAHRA subsequently responded as follows:</p> <p>".....The SAHRA DAU acknowledges receipt of the The Letter of Undertaking from the EAP and the Applicant. However, the Interim Comment issued 24/06/2025 is upheld. A field-based assessment must be conducted to identify no-go areas and areas to avoid. Further comments will be issued upon receipt of the above requested report and a revised BAR and EMPr that incorporates the results of the specialist assessment. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations in order to address this comment."</p>			
<p>Greenmined discussed the comments of SAHRA with the DMPr and extension for submission of the final BAR & EMPr was granted until 29 August 2025. Beyond Heritage was appointed to conduct the required field assessment, and the findings of the study was incorporated into this report that will be shared with SAHRA for their perusal. Any additional comments that may be received from SAHRA will be shared with the DMPr.</p>			

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr D Lombard	Landowner Farm Aardvark Nr 164	19 May 2025	No Comments Received
Mr G & Mrs E Dippenaar	Landowner Farm Aardvark Nr 164 Portion 1	19 May 2025	No Comments Received
Mr K Mulder	Landowner Farm Tusschen-In Nr 143	19 May 2025	17 June 2025
<p><u>Comments received from Mr Mulder (translated from Afrikaans to English for ease of reference):</u></p> <p>“Prospecting for copper, zinc, lead, silver, lithium, barite, sillimanite-corundum, tungsten & feldspar / In accordance with Section 16 of the MPRDA (Mineral and Petroleum Resources Development Act)</p> <p>I refer to the attached communication and information regarding (i) the application submitted by Strata Energy Minerals & Resources in respect of (ii) environmental authorisation and (iii) prospecting on the farm Tusschen-in No. 143. Thank you very much for the comprehensive information.</p> <p>To state my position, it is important that you also consider my background and connection with the Richtersveld area — both personally and with regard to my interests in the earmarked farm known as Tusschen-in No. 143.</p> <p>BACKGROUND</p> <p>I was born in the Richtersveld area in 1949 on the farm Kouefontein, about 12 kilometres from the Tusschen-in farm. My father rented the farm from the state, and I later took over the lease. Unfortunately, the state gave up the lease, and I had to find alternative arrangements. This led to my purchase of the Tusschen-in farm.</p>			

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<p>I am very familiar with the Richtersveld. I know the area well — including the vegetation, livestock, wildlife, rainfall, and water sources — and I have seen the changes over the years due to various factors, drought being one of them. There was a prolonged drought that caused many farmers, me included, to reduce livestock and start over. The already scarce and struggling vegetation was nearly eradicated, and the strong easterly winds also did not help. Despite this, prudent land management has enabled me to continue earning a living from farming.</p> <p>PURPOSE OF THE APPLICATION</p> <p>Needless to say, the purpose of prospecting is to investigate the potential availability of minerals as listed in your application, with a view to potentially mining on the farm and in the surrounding area.</p> <p>This is not the first application or prospecting attempt on Tusschen-in. As you may already know, extensive prospecting has been carried out by Anglo American for various minerals, including uranium. A geologist's feedback at the time was that the mineral deposits were too deep and not cost-effective to mine. Although I understand that things have changed over the years, this could still influence my current situation.</p> <p>PROBLEMS WITH PROSPECTING ON YOUR FARM</p> <ul style="list-style-type: none"> Grazing of livestock in the areas identified for prospecting is not suitable during the prospecting period due to several factors previously experienced during earlier prospecting. In the past, problems arose with farmworkers being given alcohol and dagga. This was accompanied by incidents of stock theft. Livestock must regularly be rotated to new camps to prevent overgrazing and trampling, and to manage the presence of poisonous plants which at certain times of the year can lead to sheep deaths. 			

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<ul style="list-style-type: none"> Small game (steenbok, duiker, klipspringer, and ribbok) in the mountain range — where the proposed prospecting is to take place — are protected by me to prevent them from leaving the area and ending up on neighbouring farms where they are hunted by dogs or shot. Unfortunately, they are already scarce in the area and nearly eradicated. On the eastern side under the mountain, I installed a 14 km standard jackal-proof fence — from the boundary fence on the neighbouring farm Grasvlakke to the municipal land on my northern boundary — precisely for the protection of the small game and to prevent their endangerment. Trampling of the veld by vehicles, drilling rigs, equipment, and the “campsite” is also a factor. Please explain how you plan to prevent bare patches from developing in the veld as a result of the prospecting/mining activities. Water use needs must be discussed. More information is needed regarding the use/application of water sources. <p>ADDITIONAL INFORMATION NEEDED</p> <p>A proposed “campsite” on Tusschen-in is mentioned, which needs to be discussed. More detailed information is required regarding:</p> <ul style="list-style-type: none"> (i) the number of workers/geologists, etc. (ii) the size of the area required for the campsite (iii) please also discuss water use requirements <p>The prospecting area is 21,217.1756 hectares in size (as I understand, this includes all the farms mentioned in your application). However, the duration of the proposed prospecting is important. What do you foresee as the start and end period? I do not believe it can be for an indefinite period.</p> <p>MINING ACTIVITIES IN THE AREA</p> <p>Should the prospecting yields the results you hope for, it marks the end of agriculture. Farming and mining cannot coexist – just mentioning two disadvantages amongst others:</p> <ul style="list-style-type: none"> (i) crime 			

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(ii) pollution (iii) large-scale ground disturbance and activities that damage nature and habitat.			
<p>COMPENSATION AND MY WAY FORWARD</p> <p>Nowhere in the full report and documents are the interests of the landowner and the sustainability of his farming addressed. For any farmer, their land is their source of income, retirement provision, and an investment should you ever wish to sell. Any prospecting with the intention of mining in the future discourages potential buyers and unfortunately drastically reduces the value of the property. It is therefore necessary to understand what the future holds for me, and it should be reasonable to ask whether this holds any benefit or income for me?</p> <p>I see your offices are in Somerset West, not far from where my wife works, in case you would like to meet.</p> <p>I appreciate your feedback and suggestions.”</p>			
<p>Greenmined acknowledged receipt of Mr Mulder’s comments and arranged a meeting between the Applicant and Mr & Mrs Mulder on 20 June 2025 where the above comments were discussed.</p> <p>The following formal response was sent to Mr Mulder on 02 July 2025 (translated from Afrikaans to English for ease of reference):</p> <p>“.....With reference to our previous correspondence and following your meeting with Mr. Koster, I have updated the Basic Assessment Report (BAR) to include the following additions and clarifications:</p> <p>1. Acknowledgement of the Landowner’s Involvement</p> <p>Your longstanding connection with the farm and region is now acknowledged in the BAR, and it is specifically stated that your local ecological knowledge will be utilised during site planning and environmental sensitivity assessments. The ecologist will contact you when visiting the farms to determine the sensitivity of specific drilling sites.</p>			

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<p>2. Grazing and Livestock Management</p> <p>We recognise the importance of rotational grazing and veld management in this specific area and its rare vegetation. The BAR and Environmental Management Programme (EMPr) now include the following conditions:</p> <ul style="list-style-type: none"> • Prior consultation with you before entering any grazing camps. • Timing of prospecting activities must take into account sensitive periods (e.g. lambing season or veld recovery). • Avoidance of camps where ecological stress is evident must be considered. <p>3. Protection of Wildlife</p> <p>Your conservation efforts – such as the 14 km jackal-proof fence – are highly appreciated. Accordingly, the EMPr includes the following conditions:</p> <ul style="list-style-type: none"> • Avoidance of wildlife corridors and sensitive habitats, particularly the eastern slopes of the farm, where possible. • Restriction of vehicle movements to daylight hours and only along approved routes. <p>4. Site Camp and Water Use</p> <p>The final report now provides more detail:</p> <ul style="list-style-type: none"> • The site camp will be limited to approximately 0.2 ha and will be used by no more than 20 people at any given time. • No water will be extracted from farm boreholes or natural sources. All water will be purchased from registered suppliers. <p>5. Duration of Prospecting Activities</p> <p>Timeframes are as follows:</p> <ul style="list-style-type: none"> • Non-invasive phases (1 – 3, 5, 7) will last approximately 48 months. • Invasive phases (4 & 6), if implemented, will last up to 24 months on selected sites. • Please also note that a prospecting right is valid for a maximum period of 5 years from the date of approval, with a once-off renewal permitted for up to an additional 3 years. The total period may not exceed 8 years. 			

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<ul style="list-style-type: none"> You will be informed at least 21 calendar days in advance of any invasive activities on your farm. <p>6. Compensation</p> <p>As discussed, the following compensation structure is proposed:</p> <ul style="list-style-type: none"> Non-invasive phases (1 – 3, 5, 7): A nominal amount of approximately R5,000 per month for access to your land. Invasive phases (4 & 6): An increased amount of approximately R15,000 per month during exploration. Final amounts will be formally agreed upon through a Surface Use Agreement. <p>7. Worker Conduct</p> <p>The EMPr specifies that:</p> <ul style="list-style-type: none"> No alcohol or drugs will be allowed on site. No firearms will be permitted on the site. No individuals will overnight on the farm unless agreed upon in the landowner agreement. An independent Environmental Control Officer (ECO) will oversee activities and maintain a landowner complaints register. <p>8. Environmental Auditing and Communication</p> <p>Annual audits by an independent environmental practitioner are a requirement of the EMPr. Summaries of the findings will be sent to all landowners, and full reports will be available on request.</p> <p>9. Closure and Rehabilitation</p> <p>Upon completion of activities, a joint site inspection will be conducted with you to confirm that rehabilitation has been carried out. Topsoil and plant material will be replaced, and any damage to fences or structures will be repaired. We appreciate your active involvement and the example you set in sustainable land use. Your comments have been thoroughly considered, and additional conditions have been included in the BAR and EMPr to ensure that prospecting, if it proceeds, is conducted with respect for your land, livelihood, and conservation efforts.</p>			

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<p>The next step in the environmental impact assessment process is to submit the final BAR and EMPr to the Department of Minerals and Petroleum Resources (DMPR) for approval. The final BAR will also soon be available on the Greenmined website, and you are welcome to download it from there.</p> <p>We will notify you as soon as the BAR is available online and once the DMPR has made a decision regarding the application...”</p>			
Mr J Swartz	Landowner Nama Khoi Local Municipality Manager Farm Steenbok Nr 165 Farm Gifkop Nr 166 Surrounding Landowner of: Farm Steinkopf Nr 22 Farm Breekhoorn Nr 159 Farm Nakanas Nr 171 Farm Meidjes Karroo Nr 179 Farm Meidjes Karroo Nr 179 Portion 1 and 3 Farm Drooge Kraal 180 Remaining Extent	19 May 2025	No Comments Received
Mr KM Mohlasedi Seleka Hydro Resources Pty Ltd	Surrounding Landowner of: Farm Nana Nr 161	19 May 2025	No Comments Received
Mr JG Cloete	Richtersveld Local Municipality Manager Surrounding Landowner of: Farquarson Nr 160	19 May 2025	No Comments Received

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Mr K Mulder	Surrounding Landowner of: Farm Kootjes Vlei Nr 162	19 May 2025	No Comments Received
Mr W Goosen	Surrounding Landowner of: Farm Ariroep Nr 163	19 May 2025	No Comments Received
Mr E Coetzee	Surrounding Landowner of: Farm Witkoppie Nr 181	19 May 2025	No Comments Received
Mr G Olivier	Surrounding Landowner of: Farm Kaa Vlate Nr 183	19 May 2025	No Comments Received
Mr J Mulder	Surrounding Landowner of: Farm Langvlei Nr 576	19 May 2025	No Comments Received
Mr J Le Roux (Namli Exploration and Mining Pty Ltd)	Surrounding Landowner of: Farm Steinkopf Nr 22 RE	19 May 2025	No Comments Received

SUMMARY OF THE PUBLIC PARTICIPATION PROCESS

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

- telephonic discussions;
- direct communication with notification documents (email);
- placement of on-site notices; and
- the placement of advertisements in the Plattelander newspaper.

A 30-days commenting period was allowed that ended on 20 June 2025 and registrations and/or comments were received from the following entities/people:

- South African Heritage Resource Authority, and
- Mr K Mulder, Landowner of Farm Tusschen- in 143.

The comments received on the DBAR were incorporated into the FBAR & EMPR that will be submitted to the DMPR for decision making. Also refer to Appendix I2 for the proof of public participation conducted.

-END OF COMMENTS AND RESPONSE REPORT-