

DMRE REF: WC 30/5/1/1/2/10375 PR

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21 October 2021

Dear Ms Smit

RE: FRESHWATER STATEMENT IN RESPONSE TO COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR LISTED ACTIVITIES ASSOCIATED WITH A PROSPECTING RIGHT ON PORTION 3 OF THE FARM WELVERDIEND NO. 511, VANRHYNSDORP, WESTERN CAPE PROVINCE, AS RECEIVED FROM THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING.

Enviroworks (Pty) Ltd has been appointed by Greenmined Environmental (Pty) Ltd (Consultant) to compile a statement in support of a response to address specific comments on the draft Basic Assessment Report for listed activities associated with a prospecting right on Portion 3 of the Farm Welverdiend No. 511, Vanrhynsdorp, Western Cape Province, as received from the Department of Environmental Affairs and Development Planning (DEA&DP) (comment dated 15 October 2021).

PROJECT DESCRIPTION:

The proposed prospecting footprint is approximately 70.077 ha over the property: Portion 3 of the Farm Welverdiend No. 511. Prospecting will be performed over a period of one (1) week over the entire prospecting footprint. Prospecting will involve non-invasive surface exploration to limit the environmental footprint experienced within the prospecting area and generally leaves little to no evidence of exploration activity as well.

The non-invasive activities will consist out of the following:

- Traversing the entire farm, and/or identified target areas on foot
- Geological mapping and characterisation of the surface material and mineralization
- Geotechnical and structural orientation mapping
- Collection of rock samples (loose) which is representative of the mineralization
- Verification of all relevant site, geological and mining data

The aim of the exploration activity is to verify the geology, historical data and any and all site data for the project, as well as to produce a most up-to-date current surface geological and geotechnical map of the mineralised zone.

The proposed project will not require any additional electricity connections. No diesel storage will be required for the prospecting phase.

Access to the proposed prospecting area will be via the N7, making use of the existing internal/haul roads to access the prospecting area.

The land surface rights of this application area are owned by the applicant.

Land access and site visit will be communicated prior to commencement of activities.

Access to the proposed prospecting area will be via the N7, making use only of the existing internal/haul roads to access the prospecting area. No 'off-road' driving will be done.

The prospecting activities will be done by a maximum of 2 Light Duty Vehicles.

LOCATION:

The location of the proposed prospecting right area is illustrated in the map below (Figure 1).

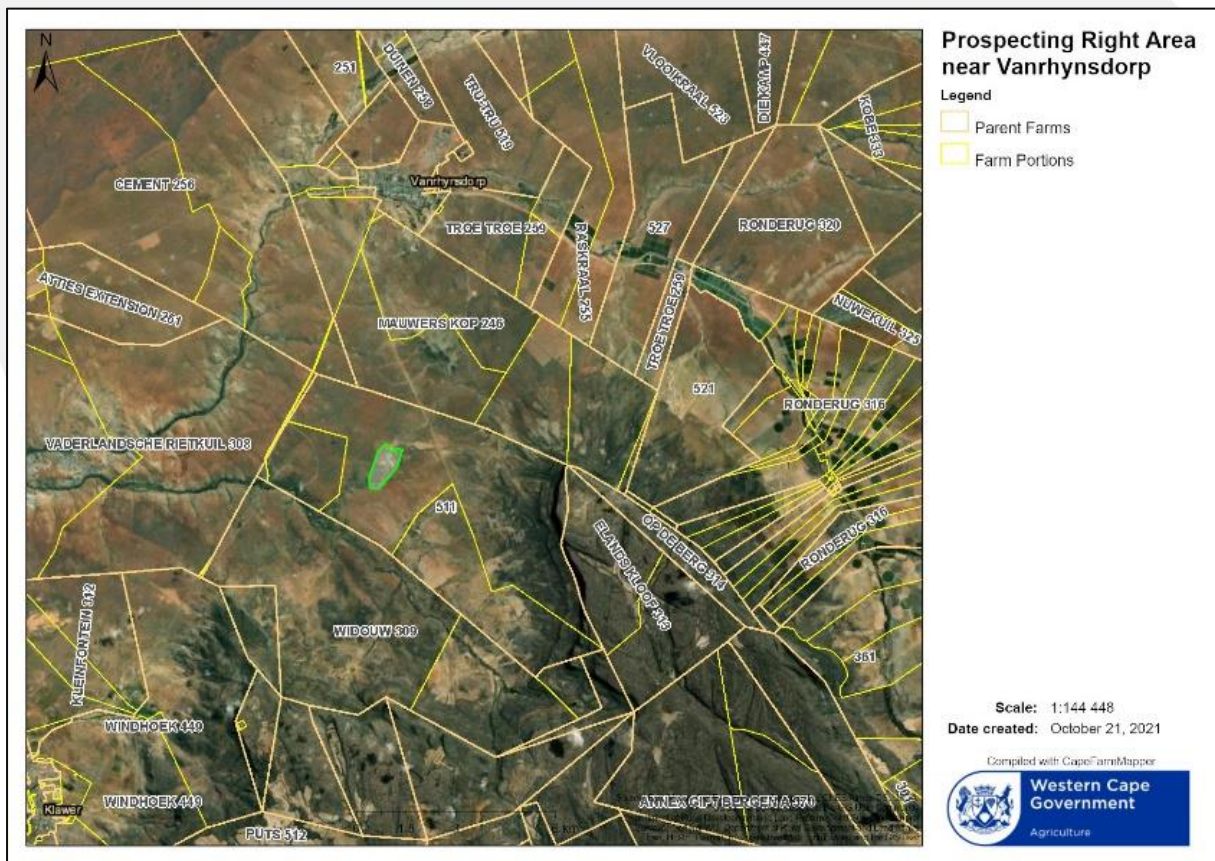


Figure 1 Locality map of the proposed prospecting right on Portion 3 of the Farm Welverdiend No. 511

COMMENT FROM DEA&DP:

Today's Impact | Tomorrow's Legacy

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"2.3. The presence of a non-perennial watercourse on-site is noted. Page 58 of the Draft BAR states the following: "The proposed site falls within the Olifants/ Doorn Water Management Area, in the E33G quaternary catchment area. According to the National Freshwater Ecosystem Priority Areas (NFPEA) map as presented by SANBI, a NFPEA river intersects with the proposed prospecting footprint falls but is partially modified in which a large loss of natural habitat, biota and basic ecosystem function have occurred. The conservation status of the area will be further assessed and discussed during the Basic Assessment process of this application." Page 107 further states that "The conservation status of the area will be further assessed and discussed during the EIA process of this application."

2.3.1. Please clarify if a suitably qualified and experienced freshwater specialist provided input to the assessment or to confirm the EAP's characterisation of the identified river.

2.3.2. The above paragraph indicates that the conservation status of the area will be further assessed during the basic assessment or environmental impact assessment ("EIA") process of this application, although it is not apparent that this potential impact has been assessed in any detail within the application.

2.4. The EMPr omits any reference to impact management measures or outcomes relating to protection of water resources, despite the prospecting area including a defined and mapped watercourse.

2.5. It is recommended that the watercourse and a suitable buffer area on either side is excluded from prospecting activities. The potential identification of future mining activities across the river corridor is not supported.

4.1. Per paragraph 2.3. above, this Directorate requires clarity on the statement in the Draft BAR pertaining to specialist assessments that will be undertaken to assess the hydrology and surface water resources of the prospecting area. It is stated on pages 6, 58, 77, 93 and 107 of the Draft BAR that the conservation status of the area will be further assessed and discussed during the basic process/ EIA process of the application. Please note that specialist assessments must be undertaken prior to the release of a Draft BAR for public participation. Should any surface water assessment be undertaken for the prospecting right application, then said assessment must be made available to registered I&APs via the release of a Revised Draft BAR. This Directorate further requires clarity whether the EAP is referring to specialist assessments that will be undertaken as part of a (separate) EIA process that will be lodged for a mining right or permit application should the results of prospecting activities be deemed favourable."

SPECIALIST STATEMENT:

Considering the specific project description above (as provided to the specialist by the Consultant) and the non-invasive prospecting method proposed, it is not anticipated that the prospecting activities will generate a noteworthy impact on the non-perennial watercourses (Figure 2) during the one week of prospecting work. The prospecting will involve driving vehicles on existing unpaved access roads and traversing the area on foot, while also collecting loose surface rock samples¹.

Even though this statement does not constitute a full specialist assessment and characterization of the non-perennial watercourses, it is the opinion of the specialist, that this detailed freshwater study will not be necessary at this stage, considering the current prospecting description.

¹ This statement is based on the project information provided to the Specialist by the Consultant. Should any of the details regarding the prospecting description change: the potential environmental impacts should be evaluated, appropriate specialist studies should be conducted if necessary, the significance of potential environmental impacts should be determined, mitigation measures should be suggested and appropriate procedures should be followed to authorize the prospecting works.

A portion of the non-perennial watercourse has been transformed by an old marble mine, just downstream of the artificial dam. There is also evidence of past mining and disturbance in the watercourse downstream from the old mine. This was confirmed by a site visit on 07 October 2021. It should be noted that the purpose of this site visit did not include assessing the watercourses over the entire prospecting right, nor did it include assessing potential impacts of the proposed prospecting.

Watercourses are nevertheless important ecological features in the landscape, therefore:

- Should this prospecting description change, the need for a more detailed freshwater study should be re-evaluated.
- Should the prospecting right be followed by a mining permit/mining application, it is recommended that a more detailed freshwater study be commissioned.

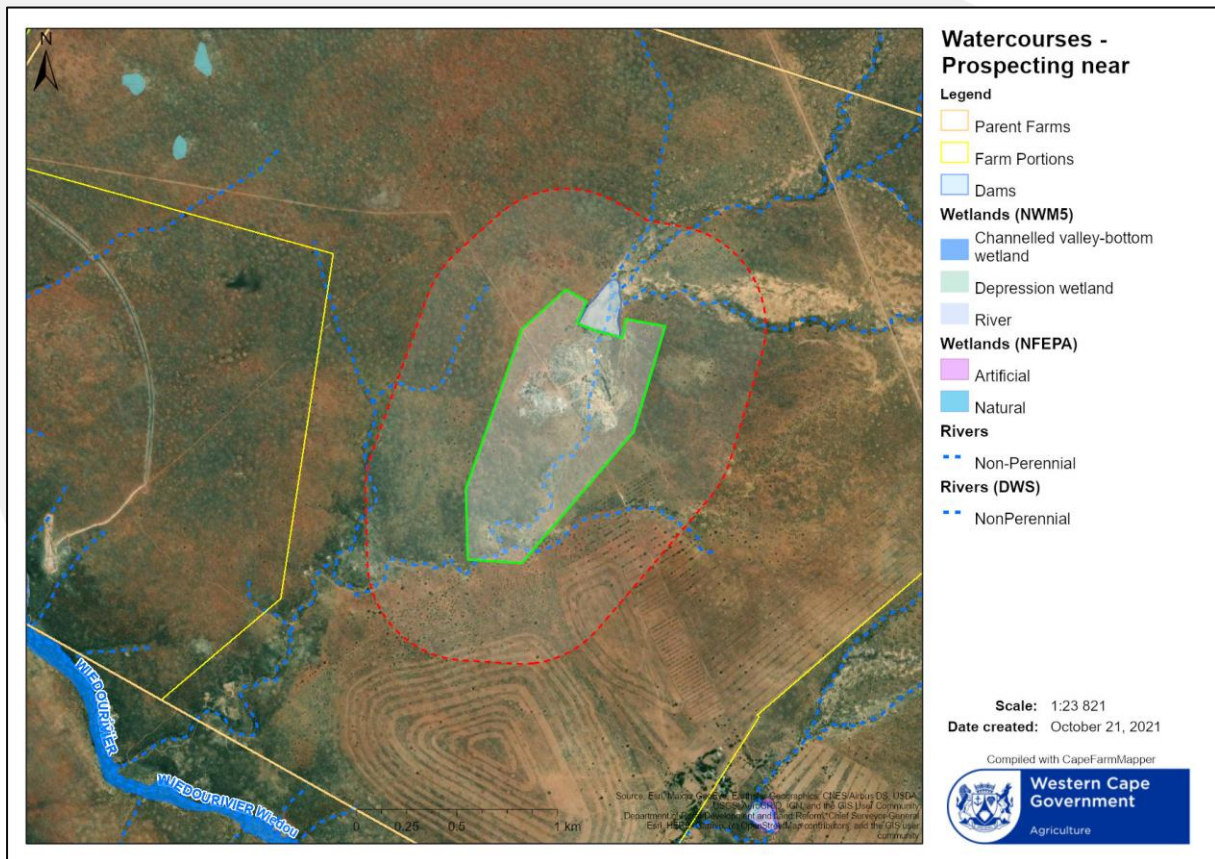

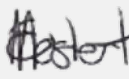


Figure 2 Perennial watercourses within the prospecting area, with a 500 m buffer around the prospecting property

RECOMMENDATIONS:

- It is recommended that disturbance and damage to vegetation and the soil surface or channel morphology be avoided in the mapped (Figure 2) non-perennial watercourses (this includes their bed and banks).
- Even though it is not anticipated that the current planned prospecting activities will have a noteworthy impact on watercourses, it is noted that the Department will not support the potential identification of future mining activities across the river corridor.

- The applicant should be aware that prospecting within the watercourse corridor does not mean that the Department will support potential identification of future mining activities across the river corridor.
- Should this prospecting description change, the need for a more detailed freshwater study should be re-evaluated.
- Should the prospecting right be followed by a mining permit/mining application, it is recommended that a more detailed freshwater study be commissioned. This study should, amongst the other requirements of a freshwater specialist study, recommend a suitable buffer for watercourses.
- It is recommended that the Consultant and the Applicant take note of the following comments from DEA&DP:
 - 6. *The applicant is reminded of its “general duty of care towards the environment” as prescribed in section 28 of the NEMA, 1998 which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment”.*

	Capacity	Name	Signature	Date
Review Specialist:	Specialist (10 years) IAIAsa Reg No: 3893 SACNASP Reg No: <i>Cert Sci Nat</i> 400328/11	Gerbrecht Elizabeth Bredenkamp		21/10/2021
Author:	Environmental and Ecological Consultant (4.5 years) MSc (SU, 2016) IAIAsa Reg No.: 5631	Elana Mostert		21/10/2021