

SOLIUM ENERGY (PTY) LTD
PROSPECTING RIGHT APPLICATION OVER FARM 622,
FOR URANIUM ORE IN THE NAMAQUALAND
MAGISTERIAL DISTRICT IN THE NORTHERN CAPE
PROVINCE.

COMMENTS AND RESPONSE REPORT

REF NO: NC 30/5/1/1/2/14025 PR

JANUARY 2025



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

COMMENTING PERIOD: 06 DECEMBER 2024 – 30 JANUARY 2025

During the initial 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 was placed in the Gemsbok Newspaper on 06 December 2024. Afrikaans and English on-site notices were placed at the border fence of the farm, at the Concordia High School, the entrance of One Up Café in Concordia, and at the entrance of the China Shop in Concordia. Afrikaans and English flyers were distributed in the rural community of Concordia. The advertisements, draft basic assessment notice, flyers, and on-site notices invited the recipients to register/comment on the project on/before 30 January 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	06 December 2024	No Comments Received
Mr J Swartz	Nama Khoi Local Municipality	06 December 2024	No Comments Received
Mrs C Visser	Nama Khoi Local Municipality Ward 1	06 December 2024	No Comments Received
Mr J Losper	Nama Khoi Local Municipality Ward 6	06 December 2024	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr B Fisher Mr Cloete	Department of Agriculture, Environment Affairs, Rural Development and Land Reform	06 December 2024	30 January 2025
<p><u>Comments received on 30 January 2025:</u></p> <p>1. Landscape connectivity is vital for the persistence of ecosystems. The National Protected Area Expansion Priority Areas are considered important sites for biodiversity conservation to meet conservation targets, and global or national biodiversity commitments. Approximately 75% (52 297 ha) of the proposed prospecting area falls within the Priority Focus Area of the NPAES.</p> <p>2. In addition, approximately 72% of the proposed prospecting area is categorised as irreplaceable CBAs and 18% as highly important ESAs. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBAs considered as “no-go” areas for any development.</p> <p>3. Namaqualand Klipkoppe Shrubland, Namaqualand Blomveld, Bushmanland Arid Grassland and Bushmanland Inslegberg Shrubland are characterised by the presence of <i>Aliodendron dichotomum</i> (formerly known as <i>Aloe dichotoma</i> var. <i>dichotoma</i>). It is currently listed as vulnerable (VU) and climate change models project a 36% decline in the species range within 100 years, assuming dispersal into newly suitable areas. In addition, there is a moratorium in place in the Northern Cape on the removal of <i>A. dichotomum</i> from the wild due to historic trade-related pressures on populations (Proclamation No. 968, 1 April 2005). All <i>A. dichotomum</i> individuals within close proximity to the planned development must be mapped in all documents going forward and regarded as no-go areas. Please also note that <i>Boschia albitrunca</i> (Shepherd’s tree) is protected under the National Forest Act (Act No. 84 of 1998) and the Northern Cape Nature Conservation Act (Act No. 9 of 2009). If this species is noted in high abundance within the study area it must be indicated as such.</p> <p>4. The Bushmanland Inselberg Shrubland are important refugia for plants and animals and act as corridors for rocky habitat species migrating across the sands covered plain plains of the Bushmanland Sandy Grassland ecosystem. Based on their higher biodiversity and contribution to local habitat diversity, the rocky outcrops must be avoided by the development. This does not imply that plains habitats are of little ecological concern.</p> <p>5. Approximately 72% of the proposed prospecting area is categorized as irreplaceable CBA`s and 18 % as highly important Ecological Support Areas. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBA 1 considered as “no-go” areas for developments. Activities which may cause fragmentation of CBAs leading to loss of ecological connectivity are not supported. Specialist assessment(s) must be undertaken if any of the above-mentioned circumstance prevail or if there is any doubt about the biodiversity value of the potentially impacted areas. The opportunities and constraints of the receiving environments must be used to inform the desirability and layout of any development proposal to ensure that developments do not compromise the biodiversity value of the area. When assessing the impact of the development on CBAs, the EAP must investigate the reasons (features) behind determination of the CBAs and critically assess whether these will be impacted negatively by the proposed construction and operational phase activities.</p>			

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<p>6. Considering the landscape connectivity in terms water provisions and ecosystem services, the cumulative impacts of mining in the region is a concern. Cumulative impacts in relation to an activity are defined in the EIA Regulations (Government Notice R543) as meaning “the impact of an activity that itself may not be significant, but may have become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertaking in the area” Considering the competing land uses on farm 622, which include mining and prospecting right applications, livestock farming and renewable energy developments, cumulative impacts must be assess within the context of landscape connectivity.</p>			
<p>7. The screening report indicated important habitats for several species of conservation concern. DAERL does not support activities that may negatively impact on habitats and ecological functioning. Appropriate buffers must be determined by a suitable qualified specialist to avoid impacting on habitats and particular attention must be paid to avoiding the loss of intact habitat, maximizing habitat heterogeneity and reducing fragmentation at a local and regional scale. The buffers must guide the development plans to reduce any present and future impact on habitats. Once suitable buffers have been mapped it must be illustrated on a map and included in the application.</p>			
<p>8. Water is a limited resource in the Namaqualand region. Water requirements for proposed activities and potential impact on broader surface and ground water resources must be rigorously assessed and considered by an aquatic/freshwater specialist and/or ground water specialist, including the cumulative impact if other developments are also taking place.</p>			
<p>9. Rehabilitation of any disturbed ecosystem is only considered successful when the ecosystem has returned to an ecologically functional state and has similar species assemblage as its natural state. Such applications must have a complete rehabilitation plan appended to submitted documentation. It should also be noted that DAERL will not support new prospecting applications on property where previously mined or prospecting areas have been suitable rehabilitated to an ecologically functioning state and have been officially closed by the DMRE.</p>			
<p>COMMENT ON BASIC ASSESSMENT REPORT IN TERMS OF PROCEDURAL REQUIREMENTS OF THE EIA REGULATIONS (GNR 982)</p>			
<p>10. Biodiversity specialists must:</p>			
<p>a. Be competent at interpreting and evaluating information and able to explain the direct and indirect consequences of an activity to biodiversity. Sub-regulation 16 (1) (b) (v) requires and environmental screening report to be generated through the web based environmental screening tool. A summary of the specialist assessments required in terms of the environmental screening tool must be provided with a copy of the screening report made available. According to the content of Table 30, specialist studies were not conducted “due to the minimal and temporary nature of the proposed prospecting activities” despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. DAERL thus strongly object to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the Department of Minerals and Energy’s (DMRE) written approval thereof.</p>			

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			<p>b. Have appropriate formal training in her/his field of expertise. Have sufficient practical experience working in the specific ecosystems of the affected region and thereby adding value to the planning and design of the proposed project/activity. The available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the Succulent Karoo Biome, to be able to make this type of broad, unqualified statement.</p> <p>c. Be able to trace impact pathways and identify indirect or cumulative impacts and consider ecosystem goods and services.</p> <p>d. Have good knowledge of relating to assessment techniques and to relevant legislation, policies and guidelines.</p> <p>e. Be registered with the South African Council for Natural Scientific Professions (SACNASP)</p> <p>Please note that the DMRE no longer sends copies of the applications to commenting authorities. It is now the responsibility of the consultant working for the applicant to ensure that all commenting authorities receive the relevant documents.</p> <p>Based on the above- mentioned information it is understood that prospecting application is for non-invasive prospecting. It is understood that the entire prospecting activity on site will comprise traversing the farm on foot and collecting rock samples for analysis. It is understood that this method will have a negligible impact on biodiversity. DAERL object to the prospecting application considering that prospecting applications ultimately lead to mining applications, and considering the proposed prospecting area targets an area that has bearing on land uses and has been identified as an area for livestock farming and contain important biodiversity features such as CBA's and water courses. Although we understand that the impacts of prospecting are usually less than that of a mining, prospecting often leads to mining and we do not support mining activities in the prospecting application area, as the environmental damage to ecologically pattern and processes is often irreplaceable, as the receiving environment is unlikely to be rehabilitated to its ecological state prior to mining.</p> <p><u>Greenmined's response on 31 January 2025:</u></p> <p>We acknowledge receipt of your correspondence dated 30 January 2025, containing comments regarding the Draft Basic Assessment Report (BAR) for the proposed prospecting project. We greatly appreciate your participation in the Public Participation Process (PPP) and your detailed feedback. Below, we address each point raised.</p> <p>1. In addition, approximately 72% of the proposed prospecting area is categorised as irreplaceable CBAs and 18% as highly important ESAs. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBAs considered as "no-go" areas for any development.</p> <ul style="list-style-type: none"> ■ The DBAR acknowledges the ecological importance of the area, including its inclusion in the Priority Focus Area of the NPAES. As detailed on

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Page 82, the report explicitly outlines that prospecting activities are designed to minimize landscape disruption. The small footprint of less than 0.3 hectares for invasive activities (refer to Page 24) ensures that the ecological connectivity of the area remains intact. Additionally, specialist walk-throughs (see Page 86) will identify and avoid sensitive areas.

2. Namaqualand Klipkoppe Shrubland, Namaqualand Blomveld, Bushmanland Arid Grassland and Bushmanland Inslegberg Shrubland are characterised by the presence of *Aliodendron dichotomum* (formerly known as *Aloe dichotoma* var. *dichotoma*). It is currently listed as vulnerable (VU) and climate change models project a 36% decline in the species range within 100 years, assuming dispersal into newly suitable areas. In addition, there is a moratorium in place in the Northern Cape on the removal of *A. dichotomum* from the wild due to historic trade-related pressures on populations (Proclamation No. 968, 1 April 2005).

All *A. dichotomum* individuals within close proximity to the planned development must be mapped in all documents going forward and regarded as no-go areas. Please also note that *Boschia albitrunca* (Shepherd's tree) is protected under the National Forest Act (Act No. 84 of 1998) and the Northern Cape Nature Conservation Act (Act No. 9 of 2009). If this species is noted in high abundance within the study area it must be indicated as such.

- The DBAR identifies that 72% of the prospecting area is categorized as irreplaceable CBAs and 18% as ESAs. As outlined on Page 86, the prospecting activities will carefully avoid sensitive areas, and specialists will conduct walk-throughs before invasive activities to ensure that CBAs and ESAs remain undisturbed. The use of flexible site planning (refer to Page 24) further emphasizes the commitment to reducing impacts.

3. The Bushmanland Inselberg Shrubland are important refugia for plants and animals and act as corridors for rocky habitat species migrating across the sands covered plain plains of the Bushmanland Sandy Grassland ecosystem. Based on their higher biodiversity and contribution to local habitat diversity, the rocky outcrops must be avoided by the development. This does not imply that plains habitats are of little ecological concern.

- The DBAR recognizes the presence of vulnerable species, including *A. dichotomum* and *B. albitrunca*. On Page 86, it is highlighted that walk-through assessments will map sensitive species, designating them as no-go zones. The project adheres to the requirements of the Northern Cape Nature Conservation Act and the National Forest Act, as mentioned under mitigation measures on Page 86 and in the EMPR (see Page 160).

4. Approximately 72% of the proposed prospecting area is categorized as irreplaceable CBA's and 18 % as highly important Ecological Support Areas. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBA 1 considered as "no-go" areas for developments. Activities which may cause fragmentation of CBAs leading to loss of ecological connectivity are not supported. Specialist assessment(s) must be undertaken if any of the above-mentioned circumstance prevail or if there is any doubt about the biodiversity value of the potentially impacted areas. The opportunities and constraints of the receiving environments must be used to inform the desirability and layout of any development proposal to

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ensure that developments do not compromise the biodiversity value of the area. When assessing the impact of the development on CBAs, the EAP must investigate the reasons (features) behind determination of the CBAs and critically assess whether these will be impacted negatively by the proposed construction and operational phase activities.

- The DBAR concurs with the importance of these areas as biodiversity refugia. As detailed on Page 64, rocky outcrops will be avoided, and flexible drilling locations will be utilized to ensure minimal disruption. This approach is reinforced on Page 86, which emphasizes that specialist walk-throughs will guide the selection of non-sensitive sites for drilling.
- Specialist assessments will investigate ecological features of CBAs to inform site planning. As described on Page 86, sensitive areas will be excluded from prospecting activities, and project layouts will be refined to ensure connectivity remains intact. The report further commits to using a minimal footprint for all prospecting activities (see Page 24).

5. Considering the landscape connectivity in terms water provisions and ecosystem services, the cumulative impacts of mining in the region is a concern. Cumulative impacts in relation to an activity are defined in the EIA Regulations (Government Notice R543) as meaning “the impact of an activity that itself may not be significant, but may have become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertaking in the area” Considering the competing land uses on farm 622, which include mining and prospecting right applications, livestock farming and renewable energy developments, cumulative impacts must be assess within the context of landscape connectivity.

- Cumulative impacts are addressed in the DBAR on Page 98, where the report commits to assessing and mitigating these impacts in consultation with specialists. Given the limited scale of the prospecting activities, the overall contribution to cumulative impacts is expected to be negligible. Nonetheless, measures outlined in the EMPR (see Page 160) ensure ongoing monitoring and mitigation.

6. The screening report indicated important habitats for several species of conservation concern. DAERL does not support activities that may negatively impact on habitats and ecological functioning. Appropriate buffers must be determined by a suitable qualified specialist to avoid impacting on habitats and particular attention must be paid to avoiding the loss of intact habitat, maximizing habitat heterogeneity and reducing fragmentation at a local and regional scale. The buffers must guide the development plans to reduce any present and future impact on habitats. Once suitable buffers have been mapped it must be illustrated on a map and included in the application.

- The DBAR commits to determining appropriate buffers to protect habitats, as detailed on Page 86. Once invasive activities are planned, specialists will identify and map sensitive areas, ensuring that these are excluded from the prospecting footprint. These buffers will be included in the final project layout (see Page 86).

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<p>7. Water is a limited resource in the Namaqualand region. Water requirements for proposed activities and potential impact on broader surface and ground water resources must be rigorously assessed and considered by an aquatic/freshwater specialist and/or ground water specialist, including the cumulative impact if other developments are also taking place.</p> <ul style="list-style-type: none"> ■ Water use requirements and potential impacts are discussed on Page 24. The DBAR specifies that water will be sourced sustainably and used minimally for dust suppression and drilling. Specialists will assess potential impacts on surface and groundwater, and cumulative impacts will be rigorously considered (see Page 98) <p>8. Rehabilitation of any disturbed ecosystem is only considered successful when the ecosystem has returned to an ecologically functional state and has similar species assemblage as its natural state. Such applications must have a complete rehabilitation plan appended to submitted documentation. It should also be noted that DAERL will not support new prospecting applications on property where previously mined or prospecting areas have been suitable rehabilitated to an ecologically functioning state and have been officially closed by the DMRE.</p> <ul style="list-style-type: none"> ■ The DBAR includes a comprehensive rehabilitation plan, as outlined on Pages 174-180. This plan ensures that disturbed ecosystems are restored to an ecologically functional state. The report commits to progressive rehabilitation and final closure according to DMRE standards, with specific measures detailed in the EMPR (see Page 160). <p>COMMENT ON BASIC ASSESSMENT REPORT IN TERMS OF PROCEDURAL REQUIREMENTS OF THE EIA REGULATIONS (GNR 982)</p> <p>9. Biodiversity specialists must:</p> <p>a. Be competent at interpreting and evaluating information and able to explain the direct and indirect consequences of an activity to biodiversity. Sub-regulation 16 (1) (b) (v) requires an environmental screening report to be generated through the web based environmental screening tool. A summary of the specialist assessments required in terms of the environmental screening tool must be provided with a copy of the screening report made available. According to the content of Table 30, specialist studies were not conducted “due to the minimal and temporary nature of the proposed prospecting activities” despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. DAERL thus strongly objects to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the Department of Minerals and Energy’s (DMRE) written approval thereof.</p> <p>b. Have appropriate formal training in her/his field of expertise. Have sufficient practical experience working in the specific ecosystems of the affected region and thereby adding value to the planning and design of the proposed project/activity. The available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the Succulent Karoo Biome, to be able to make this type of broad, unqualified statement.</p>			

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TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
			<p>c. Be able to trace impact pathways and identify indirect or cumulative impacts and consider ecosystem good and services. d. Have good knowledge of relating to assessment techniques and to relevant legislation, policies and guidelines. e. Be registered with the South African Council for Natural Scientific Professions (SACNASP)</p> <ul style="list-style-type: none"> ■ The DBAR includes an environmental screening report in Appendix L and commits to conducting required specialist studies for high-sensitivity themes. The decision to defer some studies is based on the minimal impact of initial non-invasive activities. All specialists will be registered with SACNASP, ensuring compliance with professional standards (see Page 24). <p>Please note that the DMRE no longer sends copies of the applications to commenting authorities. It is now the responsibility of the consultant working for the applicant to ensure that all commenting authorities receive the relevant documents.</p> <ul style="list-style-type: none"> ■ Noted <p>Based on the above- mentioned information it is understood that prospecting application is for non-invasive prospecting. It is understood that the entire prospecting activity on site will comprise traversing the farm on foot and collecting rock samples for analysis. It is understood that this method will have a negligible impact on biodiversity. DAERL object to the prospecting application considering that prospecting applications ultimately lead to mining applications, and considering the proposed prospecting area targets an area that has bearing on land uses and has been identified as an area for livestock farming and contain important biodiversity features such as CBA`s and water courses. Although we understand that the impacts of prospecting are usually less than that of a mining, prospecting often leads often leads to mining and we do not support mining activities in the prospecting application area, as the environmental damage to ecologically pattern and processes is often irreplaceable, as the receiving environment is unlikely to be rehabilitated to its ecological state prior to mining.</p> <ul style="list-style-type: none"> ■ The DBAR reiterates that the application pertains to non-invasive prospecting activities only, designed to determine feasibility without guaranteeing mining. As noted on Page 24, invasive ■ activities will occupy less than 0.3 hectares over the project's lifespan, with rigorous mitigation to minimize impacts. <p>The DBAR was prepared with the understanding that the proposed prospecting activities are primarily non-invasive and represent an early investigative phase to assess feasibility. Mining feasibility cannot be determined until prospecting activities have been completed, as stated throughout the DBAR. Invasive activities, limited to a cumulative disturbance of less than 0.3 hectares, will only occur in the later stages of the prospecting phase and will involve minimal disturbance.</p>

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<p>The DBAR commits to conducting specialist studies once the drilling plan is finalised, ensuring that sensitive areas are excluded from the prospecting footprint. Each drill site will occupy approximately 10m x 10m, with a maximum of four sites active at any time, resulting in a disturbance of less than 0.04 hectares at any given moment (refer to Page 24). Drill sites can also be adjusted to avoid sensitive areas, guided by walk-throughs conducted by qualified specialists.</p> <p>The assertion by DAERL regarding the EAP's qualifications is unfounded, as the DBAR clearly states that all necessary specialist studies, compliant with regulations, will be conducted. The investigative nature of the prospecting right application does not guarantee mining activities, nor does it ensure a favourable feasibility outcome.</p> <p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments provided will be incorporated into the Final Basic Assessment Report (FBAR) and submitted to the Department of Mineral Resources and Energy (DMRE), Northern Cape Province. DAERL will be informed of the DMRE's decision following the review period.</p>			
Mr D Engelbrecht	Department of Agriculture, Environment Affairs, Rural Development and Land Reform - Springbok	06 December 2024	No Comments Received
Mr T Mabija	Department of Economic Development and Tourism - Kimberley	06 December 2024	No Comments Received
Mr J van Schalkwyk	Department of Economic Development and Tourism - Upington	06 December 2024	No Comments Received
Mr K Nogwili	Department of Roads and Public Works	06 December 2024	No Comments Received

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Mr G Keyser	Department of Roads and Public Works - Upington	06 December 2024	No Comments Received
Me R van Hinsbergen	Department of Roads and Public Works - Springbok	06 December 2024	No Comments Received
Mr A Abrahams	Department of Water and Sanitation - Kimberley	06 December 2024	No Comments Received
Mr S Cloete	Department of Water and Sanitation - Upington	06 December 2024	No Comments Received
Mr Z Albanie	Department of Labour	06 December 2024	No Comments Received
Mrs N Abrahams	SANRAL	06 December 2024	No Comments Received
Ms M du Toit Mr I Mashune	National Department of Agriculture, Land Reform and Rural Development	06 December 2024	09 December 2024
<p><u>Comment received from Mr I Mashune on 09 December 2024:</u></p> <p>Good day Sir or Madam</p>			

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<p>Your notices regarding the PR applications refers.</p> <p>You are hereby requested to consult as follows:</p> <ol style="list-style-type: none"> 1. Where the land is a CPA ensure that section of the CPA amendment act is complied with. 2. Where the land is still reflecting community name, refer to section 3 (13) of the TRANCRAA legislation regarding the correct owner of the land been the department Agriculture, Land Reform and Rural Development and not Namakhoi local municipality. 3. For further advice please contact the writer hereof at 0798760481 <p><u>Greenmined's Response on 27 January 2025:</u></p> <p>Good day,</p> <p>Thank you for your email and for participating in the public consultation process for the Draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPR).</p> <p>We acknowledge your request for consultation regarding the PR applications and appreciate the issues you've highlighted.</p> <p>Compliance with the CPA Amendment Act: We will ensure that all requirements under the Communal Property Associations Amendment Act, 2018 (Act No. 20 of 2018) are adhered to, particularly regarding land held under a CPA.</p> <p>Ownership of Land Under TRANCRAA: Your reference to Section 3(13) of the Transformation of Certain Rural Areas Act (Act No. 94 of 1998) is noted. We will confirm ownership details and ensure that the Department of Agriculture, Land Reform, and Rural Development (DALRRD) is consulted where necessary, especially in cases where the land is still reflecting a community name.</p>			

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Should you require additional details or wish to discuss this further, please do not hesitate to contact us.			
Mr K Makale Mr J Mpolawa	Eskom	06 December 2024	13 December 2024
<p><u>Comments received from Mr J Mpolawa:</u></p> <p>Mr Mpolawa requested the KML file, which was sent to him the same day.</p> <p><u>Further correspondence received on 18 December 2024:</u></p> <p>Good day</p> <p>Eskom Distribution has evaluated your project and we can confirm that our Nama/Doringwater 1 66kV line and our Nama/Concordia 1 22kV Overhead Line will be affected by this project, the mining activities must be at least 15.5m away from our servitude to avoid electrocution, blasting must be at least 500m away from the line.</p> <p><u>Greenmined's response on 09 January 2025:</u></p> <p>Dear Mr Mpolawa,</p> <p>Thank you for your email and valued input. All comments received will be addressed and incorporated in the Final Basic Assessment Report.</p> <p>We trust you find this in order.</p>			

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Heritage Officer	SAHRA	06 December 2024	No Comments Received
Mr J Coetzee Mrs S Kamanja	WWF South Africa	06 December 2024	29 January 2025
<p><u>Comments received on 29 January 2025:</u></p> <p>1. WWF South Africa (WWF-SA) hereby wish to confirm its registration as an Interested and Affected Party (I&AP) in accordance with the Environmental Impact Assessment (EIA) Regulations¹ of the National Environment Management Act No. 107 of 1998 (NEMA) for the above-mentioned prospecting application for environmental authorization.</p> <p>2. Please be advised that WWF-SA is the registered owner of Portion 1 of the Farm Ratel Kraal 131 located adjacent to the proposed prospecting area as indicated</p> <p>3. WWF-SA acquired several properties declared and managed as part of the Goegap Nature Reserve specifically for their ecological importance on request from the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL) to achieve national and international conservation targets in accordance with the objectives of the National Environmental Management: Protected Areas Act No. 57 of 2003 (NEM:PAA), as amended.</p> <p>4. WWF-SA therefore has a clear interest in protecting sensitive ecosystems and threatened ecological areas on property it owns and adjacent properties from prospecting activities, as well as anticipated future impacts should the prospecting right be converted to a mining right.</p> <p>BIODIVERSITY VALUE OF PROPOSED PROSPECTING AREA</p> <p>5. The following environmental features are applicable to the proposed prospecting area as illustrated on the maps included in Annexure A:</p> <p>a. Critical Biodiversity Areas (CBAs) and Ecological Support Areas (ESAs) in terms of the 2016 Northern Cape Critical Biodiversity Area Map</p>			

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<p>b. National Freshwater Ecosystem Priority Area (NFEPA) rivers</p> <p>c. National Protected Areas Expansion Strategy Priority Areas (NPAES of 2016)</p> <p>6. Approximately 75% (52 297 ha) of the proposed prospecting area falls within the Priority Focus Area of the NPAES. These areas are considered irreplaceable sites for biodiversity conservation to meet conservation targets, and global or national biodiversity commitments.</p> <p>7. In addition, approximately 72% of the proposed prospecting area is categorised as irreplaceable CBAs and 18% as highly important ESAs. These areas are essential to meet biodiversity targets for ecosystems, species and ecological processes, with CBAs considered as “no-go” areas for any development.</p> <p>8. The proposed application is made in respect of an area that constitutes important habitat for several species of conservation concern as highlighted in the environmental screening report (Appendix L of the BAR). According to SANBI’s red data list, two Endangered (EN), eight Vulnerable (VU), six Rare and 27 Unnamed sensitive species potentially occur within the proposed prospecting area.</p> <p>Taking the above information into consideration, the irreplaceability and critical importance of the ecosystem found in this area in terms of South African law and biodiversity planning instruments (e.g. provincial and national protected area expansion strategies) is evident. For this reason, WWF-SA is of the view that, although prospecting may have relatively limited impacts on the affected area, it is certain that conversion of these rights to mining would have unacceptable consequences for biodiversity, ecological infrastructure and associated ecosystem services.</p> <p>COMMENT ON BASIC ASSESSMENT REPORT IN TERMS OF PROCEDURAL REQUIREMENTS OF THE EIA REGULATIONS (GNR 982)</p> <p>10. In terms of sub-regulation 16(1)(b)(iii) and (iv) of the EIA Regulations (GNR 982), the Environmental Assessment Practitioner (EAP) is required to include in the application a signed declaration stating their independence and competence, as well as an undertaking under oath that the information presented is true and correct. Upon careful review of the Basic Assessment Report (BAR), these documents were found to be absent, and a copy is respectfully requested.</p> <p>11. Sub-regulation 16(1)(b)(v) requires an environmental screening report to be generated through the national web based environmental screening tool. This report forms the basis of the environmental impact assessment process and is thus of critical importance in our consideration of the content of the BAR and proposed prospecting area.</p>			

STAKEHOLDERS			
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<p>A summary of the specialist assessments required in terms of the environmental screening report is provided in Table 30 of the BAR with a copy of the screening report made available in Appendix L (also see Table 3 below). According to the content of Table 30, specialist studies were not conducted “due to the minimal and temporary nature of the proposed prospecting activities” despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. This reasoning does not align with the requirements of the relevant protocol as discussed in Point 12 below.</p> <p>In addition, the available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the Succulent Karoo Biome, to be able to make this type of broad, unqualified statement. WWF-SA thus strongly object to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the Department of Minerals and Energy’s (DMRE) written approval thereof.</p> <p>According to sub-regulation 16(3)(a), “any report, plan or document submitted as part of an application must comply with any protocol or minimum information requirements related to the application as identified and gazetted by the Minister in a government notice.” Upon review of the BAR, it was determined that the report fails to consider and apply the requirements of the prescribed protocols for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020) as required in terms of sections 24(5)(a), (h) and 44 of NEMA.</p> <p>More specifically, the protocol requires that a site sensitivity verification report must be compiled through “(a) a desk top analysis, using satellite imagery; (b) a preliminary on-site inspection; and (c) any other available and relevant information” to confirm or dispute the current land use and/or environmental sensitive features identified in the environmental screening report to confirm if the identified specialist assessments are required. The protocols further require that should the site verification assessment determine that a designation of “very high” sensitivity should in fact be of “low” sensitivity, a compliance statement must be prepared by a specialist registered with SACNASP in the relevant field for submission as part of the application process. However, the BAR does not:</p> <ol style="list-style-type: none"> a. include a copy of the site sensitivity verification report; b. provide a detailed, thought-through motivation for not undertaking the requisite specialist assessments; c. provide compliance statements from SACNASP registered specialists in terms of the themes indicated in Table 4 as being of high sensitivity; and/or 			

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<p>d. provide written confirmation from DMRE regarding the acceptance of a site sensitivity verification report and compliance statements, should these exist.</p> <p>Considering the above, we respectfully request copies of:</p> <ol style="list-style-type: none"> 1.site sensitivity verification report; 2.compliance statements from suitable qualified specialists for all themes designated very high sensitivity; and 3.written confirmation from DMRE regarding the acceptance of the site sensitivity report and compliance statements to provide informed feedback on the application. <p>As it stands, the BAR appears to be fatally flawed through the lack of evidence that confirms compliance with these requirements.</p> <p>13.Appendix 1: Paragraph 3(1)(e) of the EIA Regulations (hereafter referred to as Appendix 1) further requires a description of the policy and legislative context within which the application is proposed to be included in the BAR. However, Table 4 of the BAR fails to consider the following legislation, protocols and strategies applicable to the proposed mining activities and is thus non-compliant with the requirements of section 3(e) of Appendix 1:</p> <ol style="list-style-type: none"> a .Northern Cape Planning and Development Act No 7 of 1998 b. Northern Cape Nature Conservation Act No 9 of 2009 c. The prescribed protocols in terms of the EIA Regulations for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020) <p>14. Further to the above, even though the BAR refers to the Nama Khoi Municipality's Integrated Development Plan, it does not describe the zoning of the property and instead goes into detail about the Gamsberg zinc mine located in the Khai-Ma municipal area. It is unclear how this information is relevant to the prospecting application. It is requested that the EAP confirm the municipal zoning of the property and compliance with the relevant zoning bylaws of the Nama Khoi municipality (and not the Khai-Ma municipality).</p>			

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<p>15. Paragraph 3(1)(f) of Appendix 1 requires the inclusion of a motivation for the need and desirability of the proposed application in the context of the preferred location. However, the relevant motivation in the BAR fails to consider the sensitivity of the site as highlighted in terms of the NPAES, 2016 Northern Cape CBA map and environmental screening report results (considering there are no specialist assessments, site verification report or compliance statements) and subsequently does not explain how the proposed prospecting application and potential future mining activities prevails over national and international biodiversity commitments, as well as requirements of national legislation in terms of the:</p> <ul style="list-style-type: none"> a. Montreal Global Biodiversity Framework; b. Convention on Biological Diversity; c. National Environmental Management: Biodiversity Act No 10 of 2004 (NEM:BA); and d. NEM:PAA <p>16. Paragraph 3(1)(f) of Appendix 1 requires "...an assessment of each identified potential significant impact and risk..." to be included in the BAR. Due to the following omissions, we are concerned that the impact assessment included in the BAR cannot meet this requirement:</p> <ul style="list-style-type: none"> a. Site sensitivity verification report in terms of the minimum requirements for the assessment of environmental themes (see Point 12). b. Compliance statements from suitably qualified specialists to confirm the reduced sensitivity ratings from "very high" to "low" for the relevant environmental themes indicated in Table 4. <p>OTHER CONSIDERATIONS</p> <p>17. The property description provided in the BAR and DMRE acceptance letter (Appendix H of the BAR) indicates the proposed prospecting area to be located on Farm 622. However, according to Windeed (Annexure B), the correct property description is Portion 25 of the Farm Steinkopf No 22. We would therefor appreciate clarification of this discrepancy.</p>			

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			<p>18. It needs to be pointed out that the important biodiversity areas indicated in the Mining and Biodiversity Map referred to on pages 69 and 83 of the BAR was published in 2012 and is therefore outdated. The 2016 NC CBA Map provides a more accurate reflection of the distribution of CBAs and ESAs for consideration in the BAR.</p> <p>19. It is incorrectly stated on pages 8 and 87 of the BAR that the screening tool designated the site to be of “medium” sensitivity in terms of the animal species theme. The correct designation is “high” due to the potential occurrence of several species of conservation concern (see Table 2).</p> <p>20. The BAR mentions on several occasions that specialists will be involved during later phases to micro-site drilling and borehole sites to avoid sensitive environmental features. This step is however not included in the schedule provided on page 32 of the BAR. Please clarify the reason for this omission.</p> <p>21. On pages 52 and 53 of the BAR it is stated that the 30 day comment period will be ending on 30 January 2025. However, on page 6 it is indicated as ending on 31 January 2025.</p> <p>22. Page 77 of the BAR refers to the Namaqualand biome. This is incorrect as the property falls within the Succulent Karoo Biome.</p> <p>23. Annexure I includes information related to a prospecting application in the Western Cape Province and the CV of Ms Zoë Norval. Please clarify the applicability to these documents in terms of the Concordia prospecting application.</p> <p>CONCLUSION</p> <p>24. WWF-SA is not against development as long as it is planned and implemented in a sustainable manner that complies with South Africa’s legislative framework. We are however concerned that the EIA process implemented for the proposed prospecting area does not comply with the requirements of the EIA regulations and ignores legislated requirements in terms of the minimum criteria for reporting on environmental themes. This landscape is highly sensitive in terms of its biodiversity and is known to respond very slowly to rehabilitation efforts due to its arid nature.</p> <p>25. For this reason, it is our opinion that the prospecting application DMRE REF: NC 30/5/1/1/2/14025 PR in its current form does not comply with the EIA Regulations and we object in the strongest possible way to its approval. Furthermore, WWF-SA reserves the right to provide further comment in terms of Chapter 6 of the EIA Regulations, should the application be revised to address these omissions.</p>

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<p><u>Greenmined Response on 31 January 2025:</u></p> <p>We acknowledge receipt of your correspondence dated 29 January 2025, containing comments regarding the Draft Basic Assessment Report (BAR) for the proposed prospecting project. We greatly appreciate your participation in the Public Participation Process (PPP) and your detailed feedback.</p> <p>Below, we address each point raised.</p> <p>1 -2. Registration as an I&AP and Lodging of Objection</p> <p>WWF-SA wishes to confirm its registration as an Interested and Affected Party (I&AP) in accordance with the Environmental Impact Assessment (EIA) Regulations of NEMA and lodges an objection to the application.</p> <ul style="list-style-type: none"> ■ The registration of WWF-SA as an I&AP is acknowledged. All comments and objections will be considered and incorporated into the Final Basic Assessment Report (FBAR). <p>3 - 4. Ownership and Conservation Intentions</p> <p>WWF-SA is the registered owner of Portion 1 of the Farm Ratel Kraal 131, located adjacent to the proposed prospecting area and has acquired land to achieve conservation targets under the National Environmental Management: Protected Areas Act, 2003 (NEM:PAA).</p> <p>WWF-SA acquired several properties declared and managed as part of the Goegap Nature Reserve specifically for their ecological importance on request from the Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform (DAERL) to achieve national and international conservation targets in accordance with the objectives of the National Environmental Management: Protected Areas Act No. 57 of 2003 (NEM:PAA), as amended.</p> <p>WWF-SA therefore has a clear interest in protecting sensitive ecosystems and threatened ecological areas on property it owns and adjacent properties from prospecting activities, as well as anticipated future impacts should the prospecting right be converted to a mining right.</p> <ul style="list-style-type: none"> ■ While WWF-SA's conservation initiatives and ownership of Portion 1 of Farm Ratel Kraal 131 are acknowledged, it is important to note that the proposed prospecting activities are not within the Goegap Nature Reserve and will not impact formally declared protected areas. Additionally, prospecting does not equate to mining, and the precautionary principle applies in allowing a phased approach to environmental assessments. 			

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			<ul style="list-style-type: none"> ■ Greenmined acknowledges that portions of the prospecting area overlap with CBAs and NPAES Priority Focus Areas. However, as outlined on page 86 of the DBAR, the prospecting activities will avoid sensitive ecological features. Each drill site will be limited to a 10m x 10m footprint, and no more than four sites (0.04 hectares combined) will be active at any time. Additionally, specialists will conduct pre-activity walk-throughs to ensure sensitive areas are identified and avoided. ■ It is important to emphasize that this application is for prospecting, not mining. Should future activities necessitate further environmental assessments, these will be undertaken in accordance with legal requirements. <p>5 - 9. Biodiversity Value of Proposed Prospecting Area</p> <p>The site includes Critical Biodiversity Areas (CBAs), Ecological Support Areas (ESAs), and National Freshwater Ecosystem Priority Areas (NFEPA), making it irreplaceable for biodiversity conservation.</p> <p>Taking the above information into consideration, the irreplaceability and critical importance of the ecosystem found in this area in terms of South African law and biodiversity planning instruments (e.g. provincial and national protected area expansion strategies) is evident. For this reason, WWF-SA is of the view that, although prospecting may have relatively limited impacts on the affected area, it is certain that conversion of these rights to mining would have unacceptable consequences for biodiversity, ecological infrastructure and associated ecosystem services.</p> <ul style="list-style-type: none"> ■ The DBAR acknowledges the ecological sensitivity of the area and outlines mitigation measures to minimize impacts. It should also be noted that the prospecting activities will be non-invasive for the initial phases, with invasive drilling limited to small areas. The site sensitivity verification report confirms that drilling locations will avoid high-sensitivity areas and that they will be regarded as no go areas. ■ The DBAR provides a reasoned justification for the exclusion of specialist studies. As stated on page 47, the limited scale and temporary nature of the proposed activities do not warrant extensive specialist studies. The Environmental Assessment Practitioner (EAP) has outlined a mitigation hierarchy to address potential impacts. Site sensitivity verification will be conducted prior to invasive activities, as stipulated in the DBAR. ■ Additionally, the DBAR complies with the National Environmental Management Act's requirements for prospecting applications. Should the prospecting phase yield results warranting mining, a new application with appropriate specialist studies will be submitted. <p>10 - 12. Compliance with EIA Regulations (GNR 982)</p>

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<p>The DBAR lacks an EAP declaration of independence, a site sensitivity verification report, and compliance statements from specialists.</p> <p>Sub-regulation 16(1)(b)(v) requires an environmental screening report to be generated through the national web based environmental screening tool. This report forms the basis of the environmental impact assessment process and is thus of critical importance in our consideration of the content of the BAR and proposed prospecting area.</p> <p>A summary of the specialist assessments required in terms of the environmental screening report is provided in Table 30 of the BAR with a copy of the screening report made available in Appendix L (also see Table 3 below). According to the content of Table 30, specialist studies were not conducted “due to the minimal and temporary nature of the proposed prospecting activities” despite several of the themes being listed as having High and Very High sensitivity scores specifically linked to the anticipated prospecting activities. This reasoning does not align with the requirements of the relevant protocol as discussed in Point 12 below.</p> <p>In addition, the available information does not demonstrate the EAP to possess the relevant experience or specialisations required for semi-arid, sensitive and biodiverse systems like the Succulent Karoo Biome, to be able to make this type of broad, unqualified statement. WWF-SA thus strongly object to the EAPs conclusion that specialist assessments are not required and respectfully request the site sensitivity verification report required in terms of the environmental themes protocol with a copy of the Department of Minerals and Energy’s (DMRE) written approval thereof.</p> <p>According to sub-regulation 16(3)(a), “any report, plan or document submitted as part of an application must comply with any protocol or minimum information requirements related to the application as identified and gazetted by the Minister in a government notice.” Upon review of the BAR, it was determined that the report fails to consider and apply the requirements of the prescribed protocols for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020) as required in terms of sections 24(5)(a), (h) and 44 of NEMA. include a copy of the site sensitivity verification report;</p> <p>provide a detailed, thought-through motivation for not undertaking the requisite specialist assessments;</p> <p>provide compliance statements from SACNASP registered specialists in terms of the themes indicated in Table 4 as being of high sensitivity; and/or</p> <p>provide written confirmation from DMRE regarding the acceptance of a site sensitivity verification report and compliance statements, should these exist.</p>			

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<p>More specifically, the protocol requires that a site sensitivity verification report must be compiled through “(a) a desk top analysis, using satellite imagery; (b) a preliminary on-site inspection; and (c) any other available and relevant information” to confirm or dispute the current land use and/or environmental sensitive features identified in the environmental screening report to confirm if the identified specialist assessments are required. The protocols further require that should the site verification assessment determine that a designation of “very high” sensitivity should in fact be of “low” sensitivity, a compliance statement must be prepared by a specialist registered with SACNASP in the relevant field for submission as part of the application process. However, the BAR does not:</p> <ol style="list-style-type: none"> a. include a copy of the site sensitivity verification report; b. provide a detailed, thought-through motivation for not undertaking the requisite specialist assessments; c. provide compliance statements from SACNASP registered specialists in terms of the themes indicated in Table 4 as being of high sensitivity; and/or d. provide written confirmation from DMRE regarding the acceptance of a site sensitivity verification report and compliance statements, should these exist. <p>Considering the above, we respectfully request copies of:</p> <ol style="list-style-type: none"> 1.site sensitivity verification report; 2.compliance statements from suitable qualified specialists for all themes designated very high sensitivity; and 3.written confirmation from DMRE regarding the acceptance of the site sensitivity report and compliance statements to provide informed feedback on the application. <p>As it stands, the BAR appears to be fatally flawed through the lack of evidence that confirms compliance with these requirements.</p> <ul style="list-style-type: none"> ■ The declaration of independence will be included in the FBAR (Appendix H). The site sensitivity verification was conducted in accordance with the relevant protocols, and additional specialist inputs will be obtained if deemed necessary during the prospecting phase. The DMRE will review the sensitivity verification report before granting authorization. 			


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<p>13. Omission of Key Legislative References</p> <p>The DBAR fails to reference the Northern Cape Nature Conservation Act, 2009, the Northern Cape Planning and Development Act, 1998, and the prescribed assessment protocols under Government Gazette No. 320 of 2020.</p> <p>Appendix 1: Paragraph 3(1)(e) of the EIA Regulations (hereafter referred to as Appendix 1) further requires a description of the policy and legislative context within which the application is proposed to be included in the BAR. However, Table 4 of the BAR fails to consider the following legislation, protocols and strategies applicable to the proposed mining activities and is thus non-compliant with the requirements of section 3(e) of Appendix 1: Northern Cape Planning and Development Act No 7 of 1998</p> <p>Northern Cape Nature Conservation Act No 9 of 2009</p> <p>The prescribed protocols in terms of the EIA Regulations for the assessment and reporting on identified environmental themes (Government Gazette No. 320 of 20 March 2020)</p> <ul style="list-style-type: none"> The legislative framework provided in the DBAR aligns with NEMA and MPRDA requirements. However, the additional references will be included in the FBAR to ensure completeness. 			
<p>14. Zoning and Municipal Compliance</p> <p>Further to the above, even though the BAR refers to the Nama Khoi Municipality's Integrated Development Plan, it does not describe the zoning of the property and instead goes into detail about the Gamsberg zinc mine located in the Khai-Ma municipal area. It is unclear how this information is relevant to the prospecting application. It is requested that the EAP confirm the municipal zoning of the property and compliance with the relevant zoning bylaws of the Nama Khoi municipality (and not the Khai-Ma municipality).</p> <ul style="list-style-type: none"> The FBAR will include confirmation of the zoning of the property within the Nama Khoi Municipality. Preliminary investigations indicate that the proposed activities align with existing land-use frameworks. This will be further detailed in the updated report. 			
<p>15. Need and Desirability Justification</p>			

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<p>Paragraph 3(1)(f) of Appendix 1 requires the inclusion of a motivation for the need and desirability of the proposed application in the context of the preferred location. However, the relevant motivation in the BAR fails to consider the sensitivity of the site as highlighted in terms of the NPAES, 2016 Northern Cape CBA map and environmental screening report results (considering there are no specialist assessments, site verification report or compliance statements) and subsequently does not explain how the proposed prospecting application and potential future mining activities prevails over national and international biodiversity commitments, as well as requirements of national legislation in terms of the: Montreal Global Biodiversity Framework; Convention on Biological Diversity;</p> <p>National Environmental Management: Biodiversity Act No 10 of 2004 (NEM:BA); and NEM:PAA.</p> <ul style="list-style-type: none"> ■ The prospecting application aligns with national policies on responsible mineral resource utilisation. The impact is temporary and will be mitigated through rehabilitation measures. The DBAR will expand on sustainable development principles in the need and desirability section. <p>16. Impact Assessments and Mitigation Measures</p> <p>The impact assessment lacks verification of reduced sensitivity ratings and does not demonstrate avoidance of significant environmental risks.</p> <p>Paragraph 3(1)(f) of Appendix 1 requires "...an assessment of each identified potential significant impact and risk..." to be included in the BAR.</p> <p>Due to the following omissions, we are concerned that the impact assessment included in the BAR cannot meet this requirement: Site sensitivity verification report in terms of the minimum requirements for the assessment of environmental themes (see Point 12).</p> <p>Paragraph 3(1)(f) of Appendix 1 requires "...an assessment of each identified potential significant impact and risk..." to be included in the BAR. Due to the following omissions, we are concerned that the impact assessment included in the BAR cannot meet this requirement: Site sensitivity verification report in terms of the minimum requirements for the assessment of environmental themes (see Point 12).</p> <p>Compliance statements from suitably qualified specialists to confirm the reduced sensitivity ratings from "very high" to "low" for the relevant environmental themes indicated in Table 4.</p> <ul style="list-style-type: none"> ■ The DBAR follows prescribed methodologies for assessing impact significance. If DMRE requires further assessments, these will be undertaken as part of the authorisation process. 			

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<p>17. Property Description Discrepancies</p> <p>The property description in the DBAR and DMRE acceptance letter refers to "Farm 622," whereas Windeed lists it as "Portion 25 of Farm Steinkopf No. 22."</p> <ul style="list-style-type: none"> The property description will be clarified with the DMRE. 			
<p>18. Use of Outdated Data Sources</p> <p>The DBAR references a 2012 Mining and Biodiversity Map instead of the 2016 Northern Cape CBA Map.</p> <ul style="list-style-type: none"> The DBAR includes both sources. The please refer to page 102 for the 2016 map in the FBAR. 			
<p>19. Animal Species Sensitivity Rating</p> <p>The DBAR incorrectly states that the screening tool designates the site as "medium" sensitivity for animal species when it is actually "high."</p> <ul style="list-style-type: none"> Greenmined Environmental has reviewed this comment and agrees that the sensitivity of the animal species theme should be corrected. This amendment will be made in the FBAR. However, as outlined on page 87 of the DBAR, all drilling activities will be planned to avoid sensitive habitats, and mitigation measures will be implemented to minimize potential impacts. 			
<p>20. Future Specialist Involvement</p> <p>The BAR mentions on several occasions that specialists will be involved during later phases to micro-site drilling and borehole sites to avoid sensitive environmental features. This step is however not included in the schedule provided on page 32 of the BAR. Please clarify the reason for this omission.</p> <ul style="list-style-type: none"> Micro-siting procedures are outlined in the DBAR's mitigation measures (page 86). Prior to any drilling, specialists will conduct walk-throughs to ensure sensitive areas are avoided. The schedule in the FBAR will be updated to explicitly reflect this process. The schedule will be updated to reflect this commitment. 			

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<p>21. Public Participation Period Discrepancy</p> <p>On pages 52 and 53 of the BAR it is stated that the 30 day comment period will be ending on 30 January 2025. However, on page 6 it is indicated as ending on 31 January 2025.</p> <ul style="list-style-type: none"> ▾ This will be corrected to the official closing date in the Final Basic Assessment Report (FBAR). However, comments received on the 31st of January 2025 will still be accepted. 			
<p>22. Incorrect Biome Classification</p> <p>Page 77 of the BAR refers to the Namaqualand biome. This is incorrect as the property falls within the Succulent Karoo Biome.</p> <ul style="list-style-type: none"> ▾ This will be updated in the FBAR. 			
<p>23. Irrelevant Annexures</p> <p>Annexure I includes details of a Western Cape prospecting application and the CV of Ms. Zoë Norval, which do not pertain to this application.</p> <ul style="list-style-type: none"> ▾ The relevant sections of Annexure I will be revised to remove unrelated information. ▾ This error occurred during document compilation. The FBAR will exclude irrelevant references and ensure all appended documents pertain specifically to the Concordia prospecting application. 			
<p>24 – 25. Conclusion</p> <p>WWF-SA is not against development as long as it is planned and implemented in a sustainable manner that complies with South Africa’s legislative framework. We are however concerned that the EIA process implemented for the proposed prospecting area does not comply with the requirements of the EIA regulations and ignores legislated requirements in terms of the minimum criteria for reporting on environmental themes.</p>			

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<p>This landscape is highly sensitive in terms of its biodiversity and is known to respond very slowly to rehabilitation efforts due to its arid nature.</p> <p>For this reason, it is our opinion that the prospecting application DMRE REF: NC 30/5/1/1/2/14025 PR in its current form does not comply with the EIA Regulations and we object in the strongest possible way to its approval. Furthermore, WWF-SA reserves the right to provide further comment in terms of Chapter 6 of the EIA Regulations, should the application be revised to address these omissions.</p> <ul style="list-style-type: none"> ■ While WWF-SA's concerns are noted, the DBAR follows legal requirements, and mitigation measures will be enhanced where necessary in the FBAR. The prospecting application remains compliant with NEMA and MPRDA regulations. ■ It is important to reiterate to WWF-SA that the DBAR was written with the proposed prospecting activities in mind and that it was clearly stated throughout the document that non-invasive activities form a major part of the feasibility study. Being in such early stages of the project, the feasibility of mining activities cannot be determined at this stage prior to prospecting activities being conducted. Furthermore, it was also clearly stated that any invasive activities will only occur towards the end of the prospecting phase and will involve minimal disturbance. This minimal impact, combined with the planned mitigation measures, is the reason the EAP concluded that the environmental impact would be low. ■ The DBAR also commits to conducting specialist studies once the drilling plan is finalized, ensuring sensitive areas are excluded from the prospecting footprint. Each drill site will involve Reverse Circulation (RC) and Diamond (Core) drilling methods, occupying an area of approximately 10m x 10m. A maximum of four sites will be active at any given time, resulting in a total disturbance of less than 0.04 hectares at any one time. Over the life of the prospecting right, between 10 and 30 boreholes will be drilled, with a cumulative disturbance of less than 0.3 hectares. ■ Given the minimal disturbance, drill sites can be adjusted to avoid potential impacts on sensitive areas. Before any invasive activities commence, a walk-through will be conducted by specialists, to identify and designate sensitive areas as no-go zones. The project layout will be refined based on findings once the final layout becomes available, and prospecting sites will be moved as necessary to accommodate sensitivity and accessibility considerations. 			

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<p>  The statement by WWF-SA that the BAR appears to be fatally flawed due to a lack of evidence confirming compliance with these requirements is therefore unfounded, as it was clearly stated that these studies, complying with all regulations, will be conducted to exclude sensitive areas. Regarding WWF-SA's position that development should be planned and implemented sustainably and in compliance with South Africa's legislative framework, it is critical to note that the application for a prospecting right is an investigative phase. It does not guarantee that mining activities will follow, nor does it imply any assurance of a positive outcome for mining feasibility. Greenmined Environmental remains committed to ensuring full compliance with regulatory requirements and sustainable environmental practices throughout the prospecting phase. </p> <p> We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments provided will be incorporated into the Final Basic Assessment Report (FBAR) and submitted to the Department of Mineral Resources and Energy (DMRE), Northern Cape Province. WWF will be informed of the DMRE's decision following the review period. </p> <p> Greenmined Environmental (Pty) Ltd remains committed to ensuring a thorough, transparent, and legally sound process. Further comments are welcomed before final submission to DMRE. </p>			
Mr B-J Dreyer	Wilderness Foundation Africa	06 December 2024	No Comments Received
Mrs N Goltz	National Protected Area Expansion Strategy Team Northern Cape	06 December 2024	No Comments Received

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr J Swartz	Application Area Landowner Nama Khoi Local Municipality	06 December 2024	No Comments Received
Mrs C Visser	Nama Khoi Local Municipality Ward 1 Councillor	06 December 2024	No Comments Received
Mr J Losper	Nama Khoi Local Municipality Ward 6 Councillor	06 December 2024	No Comments Received
Mrs I van Neel	Surrounding Landowner Representative of Communal Property Association Kabib 50 Remaining Extent Plaas 635 Heiorigas 49 Nooisabes 51 Farm 643 Steinkopf 22 Nababeep 134 Brakfontein 133, Melkboschkuil 132 Portion 28 Melkboschkuil 132 Portion 27 Portion 1 of Ratel Kraal 131 Farm Die Plaas 635 Portion 271 of Farm Steinkopf 22	06 December 2024	No Comments Received

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
	<p>Steinkopf 22 portion 273 Steinkopf 22 portion 274 Steinkopf 22 portion 275 Steinkopf 22 portion 276 Steinkopf 22 portion 277 Steinkopf 22 portion 278 Steinkopf 22 portion 279 Steinkopf 22 portion 280 Steinkopf 22 portion 388 Steinkopf 22 portion 389 Steinkopf 22 portion 390 Steinkopf 22 portion 391</p> <p>Steinkopf 22 portion 445 Steinkopf 22 portion 446 Steinkopf 22 portion 447 Nababeep 134 portion 13 Heiorigas 49 Remaining Extent Kabib 50 Remaining Extent Kabib 50 Portion 1 Nooisabees 51 Remaining Extent Gezelschap Bank 71 Portion 2 Kontorogab 72 Remaining Extent Kontorogab 72 Portion 2 Kweek fontein 73 Portion 1 Kweek fontein 73 Portion 2 Kweek fontein 73 Portion 3 Steinkopf 22 Portion 393 Steinkopf 22 Portion 392 Steinkopf 22 Portion 392 Steinkopf 22 Portion 270</p>		

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
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Mr J Coetzee	Surrounding Landowner WWF Land Portfolio Manager Farm Ratelkraal 131 Remaining Extent	06 December 2024	No Comments Received
Mrs J Magerman	Representative of the Interim Committee of Kommagas Buffelsrivier Plaas 200		27 January 2025

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION/KEY STAKEHOLDER STATUS

CONTACTED DATE

RESPONSE RECEIVED

Comment received from Mrs Magerman on 27 January 2025:

Good Morning Sir/ Mrs/Miss

I am Janice Magerman, secretary of the Intrim Committee of Komaggas Buffelsrivier Plaas 200.

We as Committee was instructed by Mnr Mashune to explain your assesment to our communities, but we would not be able to as we do not have the intel do so. Therefore, we would like to schedule a meeting regarding this matter as soon as possible, to resolve this matter.

Please do not hesitate to contact us.

Greenmined response sent on 27 January 2025:

Dear Janice,

Thank you for your email and taking part in the public participation.

Please see attached the notices emailed to all stakeholders on 06 December 2024, as well as the Communal Property Association representative, Mrs I van Neel.

Site notices were placed at the Buffelsrivier Primary School, Kommagas Public Library, Kommagas Suprette, and at the side of the R355 road.

Flyers were also distributed in the Kommagas community, and an advert was placed in the Gemsbok Newspaper, 06 December 2024 edition.

All information pertaining this prospecting right application is available for download on our website, I've copied the link for your perusal
<https://www.greenmined.com/prospecting-rights/>

Greenmined's second response sent on the same day:

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION/KEY STAKEHOLDER STATUS

CONTACTED DATE

RESPONSE RECEIVED

Dear Ms. Magerman,

Thank you for taking part in the public participation process and for reaching out regarding the Basic Assessment Report.

We understand the importance of providing clear information to assist you in liaising with the communities of Komaggas Buffelsrivier Plaas 200. To address your concerns and ensure you have the necessary details, we propose a Microsoft Teams meeting this week at a time that is convenient for you.

As per the public participation process, please note that the closing date for comments, as advertised, is 30 January 2025 at 17:00. The 30-day commenting period commenced on 6 December 2024.

Kindly let us know your availability for the meeting so we can finalize a date and time that suits you.

We look forward to assisting you further.

Comments received on 29 January 2025:

Dear Ms. Smit

This email serves to inform you that although we are very enlighthen that you replied to our previous mails, the members are very busy this week and would be unable to accomodate you on the Teams meeting prior to your date.

Furthermore, we struggle with signal issues on our end and members are on differend lacations at the moment.

If I may, will we be able to make another appointment.

Greenmined's response on 29 January 2025:

Dear Ms. Magerman,

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION/KEY STAKEHOLDER STATUS

CONTACTED DATE

RESPONSE RECEIVED

Thank you for your response and for keeping us informed. We understand that scheduling a meeting this week may be challenging due to members' availability and connectivity issues.

As a reminder, the public commenting period for the Draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPR) was from 6 December 2024 until 30 January 2025.

Given the circumstances, we propose including in our Final Basic Assessment Report to the Department of Mineral Resources and Energy (DMRE) that prior to any prospecting activities, a meeting should be held between the applicant and community members to address any concerns they may have. Would this be in order with you?

As outlined in the DBAR, the initial prospecting activities consist mainly of non-invasive studies before any intrusive work begins. This means there will still be an opportunity for further discussions before any significant physical activities take place.

Please let us know your thoughts on this approach. We remain available to engage further at a time that suits you.

Further Comments received on 29 January 2025:

Good day Ms.

Firstly, we would like to thank you for understanding our dilemma at this point in time. The fact of further communication is welcomed and we would surely take that opportunity.

As for community participation we will offer our support in that matter.

Hope you will contact us in due time as to your process flows.

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p><u>Greenmined's Response on 31 January 2025:</u></p> <p>Good day Janice,</p> <p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments provided will be incorporated into the Final Basic Assessment Report (FBAR) and submitted to the Department of Mineral Resources and Energy (DMRE), Northern Cape Province. WWF will be informed of the DMRE's decision following the review period.</p> <p>We will forward your details to the applicant who will liaise further with you as well.</p>			
Mr PJ Fourie	Surrounding Landowner O'OKIEP Copper Co Pty Ltd Farm Brakfontein 133 remaining Extent Nababeep 134 Remaining Extent	06 December 2024	No Comments Received

SUMMARY OF INITIAL PUBLIC PARTICIPATION PROCESS

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

- δ telephonic discussions;
- δ direct communication with notification documents;
- δ distribution of flyers in rural Concordia Community
- δ placement of on-site notices; and
- δ the placement of advertisements in the Gemsbok newspaper.

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

- δ Eskom
- δ .Department of Agriculture, Land Reform and Rural Development, Rural development and Land Reform
- δ WWF South Africa
- δ Department of Agriculture, Environmental Affairs
- δ Local Community Representative

Also refer to Appendix E.1 for the proof of public participation conducted thus far.

-END OF COMMENTS AND RESPONSE REPORT-