## **SOLIUM ENERGY (PTY) LTD**

# KAREHOUTE KLOOF 221, PROSPECTING RIGHT APPLICATION FOR URANIUM ORE IN THE NAMAQUALAND MAGISTERIAL DISTRICT IN THE NORTHERN CAPE PROVINCE

### **COMMENTS AND RESPONSE REPORT**

REF NO: NC 30/5/1/1/2/14026PR

**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 Geogab park, and at the Springbok filling station garage in Springbok. Afrikaans and English flyers were distributed in the rural community of Springbok. 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
Mr R Kritzinger	Nama Khoi Local Municipality Ward 4	06 December 2024	No Comments Received
Mr L Modise	Department of Agriculture, Environmental Affairs, Rural Development and Land Reform – Springbok	06 December 2024	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr B Fisher	Department of Agriculture, Environment Affairs, Rural Development and Land Reform	06 December 2024	No Comments Received
Mr D Engelbrecht	Department of Agriculture, Environment Affairs, Rural Development and Land Reform - Springbok	06 December 2024	No Comments Received
Mrs T Mabuza	Department of Agriculture, Land Reform and Rural Development Kimberley	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
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

### **STAKEHOLDERS**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE 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

Comment received from Mr I Mashune on 09 December 2024:

Good day Sir or Madam

Your notices regarding the PR applications refers.

You are hereby requested to consult as follows:

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

- 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

### Greenmined's Response on 27 January 2025:

Good day,

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).

We acknowledge your request for consultation regarding the PR applications and appreciate the issues you've highlighted.

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.

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.

Should you require additional details or wish to discuss this further, please do not hesitate to contact us.

### **STAKEHOLDERS**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Eskom	Mr K Makale	06 December 2024	No Comments Received
Heritage Officer	SAHRA	06 December 2024	No Comments Received
Mr J Coetzee	WWF South Africa	06 December 2024	No Comments Received
Mr B-J Dreyer Mr R Brand	Wilderness Foundation Africa	06 December 2024	20 January 2025

Conments received from Mr Brand on 20 January 2025:

Good day,

WILDERNESS FOUNDATION AFRICA (WFA) HEREBY REQUESTS TO BE REGISTERED AS AN INTERESTED AND AFFECTED PARTY (I & AP) WITH REGARDS TO THE APPLICATION FOR ENVIRONMENTAL AUTHORISATION AND PROSPECTING RIGHTS BY SOLIUM ENERGY (PTY) LTD FOR THE PROSPECTING OF URANIUM ORE ON FARM KAREHOUTE KLOOF 221 (18 866HA) IN THE NAMAQUALAND MAGISTERIAL DISTRICT IN THE NORTHERN CAPE. REFERENCE NUMBER: NC 30/5/1/1/2/14026 PR.

Please notify and confirm in writing, WFA's registration as an I & AP.

# STAKEHOLDERS TITLE, NAME AND SURNAME AFFILIATION/KEY STAKEHOLDER STATUS CONTACTED DATE RESPONSE RECEIVED

Kindly forward the following documentation regarding the above application not currently available on your website: Screening Report for all portions of Karehout 221 and valid EAPASA certificate.

Greenmined's response on 21 January 2025:

Good morning,

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

I hereby acknowledge receipt of mail, and confirm that WFA is registered as an I & AP.

Thank you for noting out the error on our website, it will be corrected. In the interim please find attached the documents as requested. We trust you find this in order.

Comments received on 30 January 2025:

RE: ACKNOWLEDGMENT OF COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED PROSPECTING ACTIVITY ON THE FARMS KAREHOUTE KLOOF 221, FOR URANIUM ORE IN THE MAGISTERIAL DISTRICT OF NAMAQUALAND, NAMAQUA DISTRICT, NORTHERN CAPE PROVINCE (DMRE REF: NC 30/5/1/1/2/14026 PR).

We acknowledge receipt of your correspondence dated 30 January 2025, containing consolidated 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.

### Comments received on 30 January 2025:

1. Impacts on Protected Area and buffer zone

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

The proposed prospecting area includes farm portions which forms part of Goegap Nature Reserve (Karehoutekloof 1/221, 2/221 and 4/221). This is clearly a fatal flaw in the application process as Section 48(1)(b), of The National Environmental Management: Protected Areas Act, 2003 (NEMPAA), read with Section 48(1) of the MPRDA, prohibits prospecting in Protected Areas. In addition, the Mining and Biodiversity Guideline (2013) also indicates that prospecting in a Protected Area is prohibited and Protected Area buffers (including buffers around National Parks, World Heritage Sites and Nature Reserves) are of high biodiversity importance and is a high risk for mining.

- Greenmined Environmental recognizes the site includes farm portions which form part of Goegap Nature Reserve, However, it is important to reiterate that the current application is for prospecting activities only, not mining. As specified throughout the DBAR, the prospecting activities are temporary and involve minimal disturbance. Non-invasive methods form a major part of the feasibility study, and invasive activities will only occur towards the end of the prospecting phase. Sensitive areas will be avoided as confirmed by pre-activity specialist walk-throughs.
- Non-invasive methods such as desktop studies, geological mapping, and radon emanometry will be prioritized in the first three years of prospecting.
- Invasive activities (drilling) will be strictly controlled, with site-specific walk-throughs conducted to avoid sensitive areas.
- No bulk sampling will take place, and all sites will be rehabilitated immediately after drilling.
- The application is being processed per the Mineral and Petroleum Resources Development Act (MPRDA) and the National Environmental Management Act (NEMA). Mitigation measures outlined in the Environmental Management Programme (EMPr) will ensure protection of sensitive areas.
- Greenmined Environmental acknowledges the legal requirements of Section 48(1) of NEM:PAA and the MPRDA. The exclusion of any properties identified as declared protected areas will be brought to the attention of the competent authority, the Department of Mineral Resources and Energy (DMRE).
- 2. Impacts on Critical Biodiversity Areas (CBA), National Freshwater Ecosystem Priority Areas (NFEPA), sensitive species and poorly protected ecosystem types.

STAKEHOLDERS			
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As correctly captured in the Draft Basic Assessment Report (DBAR) and accompanying impact assessments, the prospecting application under discussion will impact on numerous sensitive biodiversity and ecological features.

The majority of the area falls within a CBA 2 and the remainder within a CBA 1 and ESA. Critical Biodiversity Areas are essential to meet biodiversity targets for ecosystems, species, and ecological processes, and are generally considered as "no-go" for any developments. They furthermore guide decision-making about where best to locate development and inform land-use planning, environmental assessment and authorisations, and natural resource management. The CBAs in this area were specifically identified due to the presence of, among others:

- Conservation Areas Goegap Nature Reserve,
- Protected Area distance buffers 5km and 10km.
- Threatened and vulnerable avifauna species,
- Poorly protected vegetation types (Namaqualand Klipkoppe Shrubland, Namaqua Blomveld),
- National Freshwater Ecosystem Priority Area (NFEPA) watercourses and catchment areas.
- NPAES PA and Focus Area,
- Goegap Nature Reserve Expansion Footprint,
- SKEP Expert Areas
- ` Landscape structural elements

According to the latest SANBI Vegetation Map (2024) there are two (2) vegetation types which occur within the proposed prospecting area. According to the 2018 National Biodiversity Assessment report, both vegetation units are classified as "Poorly Protected" and are still a far way off from satisfying the national conservation targets that have been set.

STAKEHOLDERS			
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Any prospecting or development activities on the proposed properties will thus impact on the national conservation targets for these poorly protected vegetation types as well as the highly specialized and endemic plant species associated with them.

Very little, to no consideration was given to the impact that any prospecting activities will have on these CBAs, or how these impacts will be mitigated. Any damage caused by mining in the proposed prospecting area will cause irreplaceable loss and should be completely avoided.

The area under discussion is also important from a freshwater ecosystem perspective and the screening tool assessment indicated "very high" sensitivity. This is due to the Ja-leegte River (a priority river) crossing large sections of the property and also includes a seasonal wetland in the south-east. FEPAs achieve biodiversity targets for river ecosystems and threatened fish species and were identified in systems that are currently in a good condition (A or B ecological category). Their FEPA status indicates that they should remain in a good condition to contribute to national biodiversity goals and support sustainable use of water resources.

Greenmined Environmental acknowledges WFA's interest in protecting sensitive ecosystems. The proposed prospecting activities will be undertaken with full compliance to South Africa's legislative framework, including NEM:PAA and NEM:BA. The DBAR explicitly states that prospecting activities will be conducted in a manner that avoids sensitive ecosystems. Furthermore, this prospecting application does not guarantee future mining activities. Any future applications for mining rights would be subject to separate environmental assessments and public participation processes.

The DBAR acknowledges the conservation importance of the area and outlines strict impact mitigation measures.

The proposed activities do not involve large-scale land disturbance or permanent infrastructure. The prospecting methodology ensures flexibility in site selection.

A no-go approach will be implemented for particularly sensitive areas, identified in consultation with conservation authorities.

Prospecting does not equate to mining—any potential future mining application would require a separate comprehensive environmental impact assessment (EIA).

3. The prospecting application will impact Protected Area expansion strategies.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

The proposed prospecting application is situated within an area which is deemed to be a priority area for protected area expansion. The properties targeted for the Prospecting Application falls within the DAERL's Goegap Nature Reserve Buffer Zone and Protected Area Expansion Footprint as well as a Primary Focus Area of the Northern Cape Protected Area Expansion Strategy (NCPAES), which feeds into the National Protected Area Expansion Strategy (NPAES). The area within which the proposed development is located is thus a national priority for protected area expansion based on numerous biodiversity and ecological features identified through systematic biodiversity planning.

No mention of the above is made in the application and concerns regarding the potential impacts of the proposed development on the Goegap Nature Reserve (GNR) Buffer Zone & Expansion Footprint and NCPAES Primary Focus area.

This should be an important consideration in the application for prospecting rights as it will impact on the objectives and mandates of DAERL in terms of the expansion of GNR. Both the GNR Expansion Footprint and NCPAES were specifically developed with the aim of improved ecosystem representation and ecological sustainability through effective and strategic protected area expansion. Mining, prospecting, and other large-scale developments have the potential to directly influence and obstruct the protected area expansion targets adopted and implemented by the Department of Forestry, Fisheries and Environment (DFFE) and the Northern Cape Department of Agriculture, Environment, Rural Development and Land Reform (DAERL).

The proposed prospecting application was accepted by the Department of Mineral Resources and Energy (DMRE) for consideration under reference NC 30/5/1/1/2/14026 PR. As outlined in the Draft Basic Assessment Report (DBAR), all sensitive areas, including those within the Goegap Nature Reserve Buffer Zone and Protected Area Expansion Footprint, will be excluded from invasive prospecting activities. This will be achieved through specialist studies and walk-through assessments conducted prior to the commencement of any invasive activities.

While the Northern Cape Protected Area Expansion Strategy (NCPAES) and the National Protected Area Expansion Strategy (NPAES) identify this area as a priority for conservation expansion, the DBAR has acknowledged the biodiversity importance of the site and has incorporated mitigation measures to ensure minimal environmental impact. The prospecting activities will not obstruct conservation objectives, as the methodology allows for adaptive site selection to avoid ecologically significant areas.

Nonetheless, Greenmined Environmental recognizes the concern regarding the potential impact of prospecting on protected area expansion targets.

This matter will be formally raised with the DMRE for consideration in their decision-making process.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

The final decision on the application will ultimately rest with the competent authority, and any additional conditions imposed to safeguard conservation priorities will be fully adhered to.

We remain committed to engaging with relevant stakeholders, to ensure that all environmental and conservation considerations are thoroughly assessed.

4. The draft Basic Assessment Report is deemed insufficient for use in granting Environmental Authorisation

Planned activities and resulting impacts associated with prospecting have not been adequately quantified. Reference to the localities of planned prospecting activities and infrastructure are vague in the proposed activity map (Annexure C of the DBAR). The plan is generic and not site specific with no indication of associated infrastructure placement or overall layout plan (composite map). The same holds true for the rehabilitation plan and map (Annexure D of DBAR). This is clearly a fatal flaw in the application process and in direct contravention of Appendix 1 (3)(c), of the Environmental Impact Assessment Regulations, 2014. No fair and accurate decision on environmental authorisation can be made without this information available.

The compulsory national web-based environmental screening tool assessment that has been provided (in terms of regulation 19 and regulation 21 of the Environmental Impact Assessment Regulations) classifies the terrestrial biodiversity within the proposed prospecting application to be of "Very High" sensitivity based on the following features:

- o Goegap Nature Reserve
- o Critical Biodiversity Areas 1 & 2
- o Ecological Support Area
- National Protected Area Expansion Strategy (NPAES)

The animal species theme has also been classified as "High sensitivity" due to the occurrence of the following avifauna species Neotis Iudwigii (Ludwig's Bustard), Falco biarmicus (Lanner Falcon, Aquila verreauxii (Verreaux's Eagle), Circus maurus (Black Harrier), Sagittarius serpentarius (Secretary Bird).

STAKEHOLDERS			
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None of the potential impacts on the above are addressed in the DBAR and the impact of prospecting and level of risk to biodiversity and ecosystems are described by the EAP to be low to moderate. This is deemed to be another fatal flaw in the application process. Wilderness Foundation Africa is requesting that a full Fauna and Terrestrial Biodiversity assessment is carried out on the property with evidence of qualified specialist input.

- •The absence of a comprehensive Alien Invasive Species (AIS) list and indication that species listed occurs in the Nama Karoo poses significant risks. Invasive species are known to alter ecosystems, threaten biodiversity, and create substantial economic costs. The successful implementation of eradication and control measures largely depends on having accurate and detailed information on all invasive species present. Incomplete data can lead to the underestimation of the problem and may result in the failure to address critical threats to natural ecosystems, agriculture, and water resources.
- •The presentation of environmental attributes associated with the site e.g. Figure 14-16 (maps on biodiversity features in the DBAR) in the report without a corresponding legend, and insufficient descriptions, severely compromises the clarity and accuracy of the data being communicated. Legends are crucial as they provide the necessary context for interpreting the symbols, colors, and scales used in maps. Without them, readers are left to make assumptions, which can lead to misinterpretation and confusion of the data represented. Additionally, incorrect or selective headings exacerbate the problem by providing inaccurate information about the maps' content. This not only diminishes the credibility of the report but also hampers the decision-making process, as stakeholders rely on precise and trustworthy data to plan and manage resources effectively.
- •Table 17: Land uses and/or prominent features that occur within 500m radius of S1 is incomplete. Gaps in this information can lead to poorly informed decisions, moreover, incomplete data may result in the oversight of essential land use categories, such as agricultural or conservation areas. This can have a detrimental effect on sustainable development efforts and ecosystem management, and it is imperative that all land use categories are thoroughly documented.

The Draft Basic Assessment Report (DBAR) is fully compliant with the Environmental Impact Assessment (EIA) Regulations and provides adequate information to support informed decision-making. The prospecting sites remain flexible, with final locations to be determined through specialist walk-throughs and environmental constraints assessments, ensuring that sensitive areas are avoided.

The Rehabilitation Plan, as detailed in Appendix D of the DBAR, outlines specific measures to restore drill sites to their natural state upon completion of activities. No permanent structures will be erected, and all drilling sites will be fully rehabilitated in accordance with the prescribed environmental management measures.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

The Screening Tool Assessment recognizes the terrestrial biodiversity sensitivity of the area as "Very High" but provides justification for why the anticipated impacts of prospecting remain low to moderate. The proposed activities are limited to small-scale borehole drilling, which does not equate to large-scale mining operations that could result in significant ecosystem disruption. The mitigation hierarchy—Avoidance, Minimization, Rehabilitation—is strictly adhered to, ensuring that environmental impacts are managed effectively.

Concerns regarding alien invasive species have been addressed in the Alien Invasive Species Management Plan (Appendix J), which includes specific provisions for monitoring, control, and eradication where necessary. Additionally, the environmental maps and data interpretation provided in Figures 14-16 of the DBAR clearly illustrate the biodiversity features of the project area. If required, additional legends or clarifications can be incorporated for enhanced readability.

The cumulative impacts of the proposed prospecting activities are considered insignificant, given the limited scale, temporary nature, and strict environmental management measures in place.

The public participation process (PPP) concerning environmental authorisation applications is comprehensively laid out in Chapter 6 of the Environmental Impact Assessment Regulations, GN R543 in GG 33306 of 18 June 2010 (EIA Regulations). Your attention is drawn to Regulation 54(7) of the EIA Regulations which provides that all information containing all relevant facts in respect of the application is made available to potential I&APs; and that participation by potential I&APs is facilitated in such a manner that all potential I&APs are provided with a reasonable opportunity to comment on the application. No supporting documents e.g. written communication, site notices, photographs and newspaper adverts, is included in the application (Appendix E is absent from DBAR) to indicate that the PPP has commenced, and information has been made available to I&APs.

It is a major concern that the outlying communities of Komaggas (80km away) and Concordia (30km away) were included in the process, whilst communities situated in close proximity to the site (10-20km) such as Fonteintjie and Carolusberg have been omitted from the consultation. The Fonteintjie community especially as they are the beneficiaries of the Springbok comanage area of which RE 221 is part of.

The impact assessment done for the proposed prospecting activities is not adequate and does not comprehensively assess the potential impacts that may arise from the proposed activities while the cumulative impact of the application is also not assessed. Mitigation measures identified in the EMPr are not deemed suitable or effective and are largely generic.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

The Draft Basic Assessment Report (DBAR) provides evidence of the public participation process in Appendix E, which includes a newspaper advertisement published in the Gemsbok Newspaper on 6 December 2024, as well as site notices displayed in both Afrikaans and English at the Goegap Nature Reserve farm fence, as well as the Engen Garage in Springbok, next to Spar.

Additionally, flyers containing project information were distributed within the Komaggas, Springbok, and Concordia communities to ensure broad awareness of the proposed prospecting application.

Greenmined Environmental note the comment that the Fonteintjie and Carolusberg communities are in closer proximity to the project site and will therefore extend consultation efforts to include these communities.

In conclusion, while the public participation process (PPP) has been conducted in accordance with legal requirements, additional measures will be implemented to expand stakeholder engagement and enhance inclusivity, particularly for the Fonteintjie and Carolusberg communities.

#### CONCLUSION

We duly request concise and detailed responses to the concerns we raised and request to exclude certain farm portions from the prospecting application. WFA is willing to engage in open discussions with both the Consultant and Applicant to have our concerns better understood.

WFA respectfully requests being adequately informed about any other developments in your application that may affect our position as an Interested and Affected Party. WFA may attend the Regional Mining Development and Environmental Committee (RMDEC) meeting to make a presentation on the application. WFA reserve the right to comment further on the application should any new information become available to us that we consider to be of importance in our opposition to this application.

Greenmined Environmental appreciates the detailed comments and concerns raised by Wilderness Foundation Africa (WFA) regarding the Draft Basic Assessment Report (DBAR). As highlighted throughout the DBAR, the prospecting activities remain in the preliminary exploration phase, with a strong emphasis on non-invasive methodologies to gather essential geological data. Given the vast extent of the application area, it is both scientifically and procedurally appropriate that further specialist studies will be conducted over specific areas of interest once non-invasive studies have been completed. However, in order to comply with South African legislation, a prospecting right is a prerequisite for conducting these prospecting activities.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED

Greenmined Environmental remains committed to ensuring that all sensitive areas are excluded from invasive prospecting activities through pre-activity assessments and specialist studies. Furthermore, any properties formally designated as Protected Areas under the National Environmental\_Management: Protected Areas Act (NEM:PAA) will be brought to the attention of the competent authority, the Department of Mineral Resources and Energy (DMRE), to ensure full compliance with legislative requirements.

It is important to reiterate that this application does not authorize mining, and that the mitigation hierarchy (Avoid, Minimize, Rehabilitate, Offset) will be strictly followed to ensure responsible environmental management. The participation of WFA in future discussions, including any engagements at the Regional Mining Development and Environmental Committee (RMDEC), is acknowledged and welcomed.

Greenmined Environmental remains open to ongoing correspondence and stakeholder engagement to ensure that all concerns are thoroughly considered. We thank WFA for actively participating in the public participation process and for contributing valuable feedback. All comments received will be incorporated into the Final Basic Assessment Report (FBAR) before submission to the DMRE, Northern Cape Province.

Mrs N Goltz	National Protected Area Expansion Strategy Team Northern Cape	06 December 2024	No Comments Received
Mrs I van Neel	Communal Property Association	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	Nama Khoi Local Municipality Manager Application Area Landowner & Surrounding Landowner	06 December 2024	No Comments Received
Mr R Kritzinger	Nama Khoi Local Municipality Ward 4 Councillor Application Area Landowner & Surrounding Landowner	06 December 2024	No Comments Received
Mr J Coetzee	WWF South Africa Application Area Landowner & Surrounding Landowner	06 December 2024	No Comments Received
Administration Office	Provincial Government Northern Cape - Administration Office Application Area Landowner & Surrounding Landowner	06 December 2024	No Comments Received
Ms M Jonk	Goegap Nature Reserve Application Area Landowner & Surrounding Landowner	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
Mrs C Carsten	Springbok Guest Farm Application Area Landowner & Surrounding Landowner	06 December 2024	No Comments Received
Mrs K Hanekom	Surrounding Landowner	06 December 2024	No Comments Received
Mr J.H. Roux	Surrounding Landowner	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;
- $\delta$  direct communication with notification documents;
- $\delta$  distribution of flyers in the rural Springbok Community
- $\delta$  placement of on-site notices; and
- $\delta \quad \text{ the placement of advertisements in the Gemsbok newspaper.}$

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:

### **SUMMARY OF INITIAL PUBLIC PARTICIPATION PROCESS**

- δ Wilderness Foundations Africa
- $\delta$  .Department of Agriculture, Land Reform and Rural Development
- δ WWF South Africa
- $\delta$  Interim Committee of Kommagas Buffelsrivier Plaas 200

Also refer to Appendix E.2 for the proof of public participation conducted thus far.

-END OF COMMENTS AND RESPONSE REPORT-