

**DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED  
PROSPECTING IN SEA CONCESSION AREA 7C BY TRANS  
ATLANTIC DIAMONDS (PTY) LTD**

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TRANS ATLANTIC  
DIAMONDS

**Appendix 16:  
Comments & Response Table**

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## APPENDIX COMMENTS AND RESPONSES TABLE

Comments and response Table for Prospecting 7C			
Name	Date	Comment	Response
<b>Written comments received throughout the scoping phase Process</b>			
<b>Stakeholder 1</b>	06/06/2022	Thank you for the notification. Kindly provide us with the shapefiles of the application area so that we can establish which petroleum exploration rights overlap with the application area in question.	This was sent to the stakeholder.
<b>Stakeholder 2</b>	06/06/2022	Please can you kindly register me as an interested and affected party in the application by Trans-Atlantic Diamonds for Block 7C	This stakeholders was included as an interested and affected party.
<b>Stakeholder 3</b>	22/06/2022	<p>SUBJECT: COMMENTS ON THE BACKGROUND INFORMATION DOCUMENT ON THE APPLICATION FOR PROSPECTING RIGHTS AND ENVIRONMENTAL AUTHORISATION TO PROSPECT IN THE OFFSHORE SEA CONCESSION AREA 7C.</p> <p>The Branch Oceans &amp; Coasts (O&amp;C) of the Department of Forestry, Fisheries, and the Environment (DFFE) appreciates the opportunity granted to comment on the Background Information Document on the Application for Prospecting Rights and Environmental Authorisation to Prospect in The Offshore Sea Concession Area 7C.</p> <p>The Branch O&amp;C has provided recommendations in terms of the National</p>	Thank you for the informative comments. We will make sure to consider the listed concerns and suggestion in the final BAR.

Environmental Management Act, 1998 (Act No. 107 of 1998), (“NEMA”) and the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“ICM Act”).

The Branch O&C has the mandate to ensure the holistic management of the coast and estuarine areas as an integrated system and promote coordinated coastal management. It ensures that the ecological integrity, natural character, and economic, social, and aesthetic value of the coastal zone are maintained, and that people, properties, and economic activities are guarded against dynamic coastal processes.

Guided by the principles of integrated coastal management, the Branch O&C continues to strive for social equity and promote the sustainable use of coastal resources. The Branch O&C will provide detailed comments and recommendations based on the assessment of the adequacy of proposed mitigation measures in the Marine Ecology Impact Assessment, Fisheries Impact Assessment, Socioeconomic Impact Assessment, and Climate Change and Air Emissions Impact Assessment.

Please note the following recommendations for your considerations:

1. The report outlines that Trans-Atlantic Diamonds Pty Ltd (The Applicant) has applied for the right to prospect for diamonds and other gemstones and precious metals and ferrous and base metals such as rare earth in Sea Concession Area 7C. This area covers 200 246 ha and extends from 12km south of Hondeklipbaai (southern boundary) to 19km

north of Hondeklipbaai (northern boundary) (Figure 1).

The boundary closest to the shore starts approximately 5 km (2.7 nautical miles) west of the high-water mark at a water depth of 70 m. The concession extends 65 – 100 km westwards (at its furthest point) from this point to 200 m water depths.

2. The report further elaborates that sampling will be undertaken in four phases and includes a combination of non-invasive (acoustic survey, data acquisition, and analysis) and invasive activities (Van Veen grab, core, and drill samples). It is further detailed that sampling will be done at 20–50 sites where core samples will be collected at 100–200 sites, disturbing a total surface area of 5 square meters (m<sup>2</sup>) and a total volume of 1.5 cubic meters (m<sup>3</sup>) in which acoustic equipment will be used to send out sound towards the seabed to determine the presence of minerals. Consequently, impacts on marine ecology – potential disturbance of fauna (invertebrates, fish, mammals, seabirds, and turtles), the impact of fine sediment plumes on surrounding benthos and water column; damage to the seafloor, impact on benthic habitat communities, seabird features noise, shipping activities, waste discharges during vessel operations; and impacts on fisheries and the livelihoods of fishing communities due to exclusion from fishing grounds and disturbance of target fish species, impact on commercial and small-scale fisheries and/or fishing activities, tourism, noise, disturbance, and socio-economic impact on fisheries are anticipated.

3. While the EAP has embarked upon listing potential mitigation measures to inform

assessment and report on the necessary mitigation measures to reduce impact, this recommends the following specialist studies to be undertaken to provide expert advice on each of the impacts, including recommended mitigation measures to inform decision-making:

- Marine Ecology Impact Assessment - to assess the impacts of proposed well drilling activities on the biophysical and ecological integrity of the seabed including impacts on; marine fauna and flora, the planned and future use of the adjacent coastal area, and whether this is in alignment and whether this proposal will augment/support the planned socio-economic development for the South-West coastline.

- Aquatic Biodiversity Impact Assessment- to assess the impact on aquatic biodiversity. A combination of environmental concerns relating to the proposed well drilling of the seabed necessitates that the merits of each proposal can be carefully weighed against the externalities to inform whether this proposal is socially responsible, economically justifiable, and ecologically sustainable.

- Fisheries Impact Assessment - to assess the long-term cumulative and unintended impact of the proposal on small-scale fishers, and fisheries research, sediment plume impact on fish stock recruitment during all project phases.

- Cumulative Impact Assessment- Past assessment of similar applications has revealed that there is adequate consideration of cumulative impacts. The scope of cumulative impacts is often limited to direct impacts (project-related activities) and the

		<p>scope often fails to consider long-term, unintended impacts resulting from similar activities within one area of interest (other seismic surveys/exploration drilling expeditions, oil, and gas activities). The aspect that is often unacknowledged is that all the anticipated impacts of the drilling, sampling, and/or surveying, are taking place together at the same locations.</p> <p>This Branch would like the assessment reviewer and appointed specialist to take cognisance of this and report on the significance of these impacts in the next report.</p> <p>4. The Branch O&amp;C will provide detailed comments and recommendations during the next public process when specialist studies have been conducted and more information is available.</p> <p>5. The Branch O&amp;C requests to be registered as an I&amp;AP.</p> <p>Kindly note that the Department reserves the right to revise its comments and request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office via <a href="mailto:OCEIA@dffe.gov.za">OCEIA@dffe.gov.za</a> / or Physical</p> <p>Address: Department of Forestry, Fisheries &amp; the Environment (DFFE), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.</p>	
<p><b>Stakeholder 5</b></p>	<p>23/06/2022</p>	<p>RE: Trans Atlantic Diamonds (Pty) Ltd APPLICATION: PROSPECTING RIGHTS</p>	<p>Thank you for the informative comments. We will make sure to consider the listed concerns and suggestion in the final BAR.</p>

AND ENVIRONMENTAL AUTHORISATION TO PROSPECT IN THE OFFSHORE SEA CONCESSION AREA 7C.

SANParks is hereby registering as Interested and Affected Party for the above project. SANParks takes note of the proposed project, as described below.

Trans Atlantic Diamonds Pty Ltd (The Applicant) has applied for the right to prospect for diamonds and other gemstones and precious metals and ferrous and base metals such as rare earths in Sea Concession Area 7C. This area covers 200 246 ha and extends from 12km south of Hondeklipbaai (southern boundary) to 19km north of Hondeklipbaai (northern boundary) (Figure 1). The boundary closest to the shore starts approximately 5 km (2.7 nautical miles) west of the high-water mark at a water depth of 70 m. The concession extends 65 – 100 km westwards (at its furthest point) from this point to 200 m water depth (Figure 2 below).

SANParks also takes note that only prospecting activities are applied for in the current application and will consist of:

Geophysical/ Acoustic Surveys: Acoustic equipment is used to send out sound towards the seabed. The sound energy is reflected from the seabed and travels back to the receiver.

Van Veen Grab sampling: Sampling will be done at 20–50 sites, disturb a total surface area of 5 square meters (m<sup>2</sup>) and a total volume of 1.5 cubic meters (m<sup>3</sup>).

Core sampling: Core samples will be collected at 100–200 sites. The core samples will disturb a total surface area of 1.57 m<sup>2</sup> and collect a total volume of 4.71 m<sup>3</sup>.

Drilling: Target areas will be sampled using a drill with a surface area of 5m<sup>2</sup>. In total, 1 500 samples will be collected and will cover a surface area of 7 500 m<sup>2</sup>. A total surface area of 7 507 m<sup>2</sup> (0.75 ha) will be disturbed during all phases

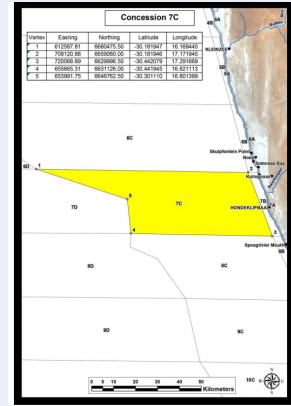


Figure 2. The concession extends 65 – 100 km westwards (at its furthest point) from this point to 200 m water depth.

SANParks comment and concerns on possible impact:

It is not clear what method will be used for the geophysical surveys, the activity is labelled acoustic, but under impacts seismic surveys are mentioned, this need to be clear, impacts are significantly different.

Prospecting activities have less damage to the sea floor compared to the extraction/mining phase which will have significant impact, what activities will extraction entail?



		<p>Is there a specific location of where in the block the activities will take place, or will it be spread across the entire footprint?</p> <p>The activities will take place near the Namaqua MPA with sensitive ecosystems and habitats. Please ensure to map the MPA and provide distances to the MPA.</p> <p>The footprint may overlap with the fishing area of the Hondeklipbaai community. What are the impacts and compensation for loss of fishing to the community area of fishing?</p> <p>Specific impacts concerned about:</p> <p>direct impact of seabed excavation and tailings disposal on benthic habitats specifically in and biodiversity important area</p> <p>impact of fine sediment plumes on surrounding benthos and water column, impacting fishing areas and MPA ecosystems</p> <p>☒ Improper waste discharges during vessel operations;</p> <p>Impacts on fisheries and the livelihoods of fishing communities due to exclusion from fishing grounds and disturbance of target fish species. SANParks remains concerned about the future impact on livelihood and biodiversity impacts.</p>	
<p><b>Stakeholder 6</b></p>	<p>23/06/2022</p>	<p>RE: APPLICATION FOR PROSPECTING RIGHTS AND ENVIRONMENTAL AUTHORISATION TO PROSPECT IN THE OFFSHORE SEA CONCESSION AREA 7C, IN HONDEKLIP BAY.</p> <p>The Directorate: Sustainable Aquaculture Management of the Department of Forestry, Fisheries and the Environment ("DFFE") has</p>	<p>Thank you for the informative comments. We will make sure to consider the listed concerns and suggestion in the final BAR.</p>

reviewed the Background Information Document for the proposed prospecting in the offshore sea concession area 7C by Trans Atlantic Diamonds (Pty) Ltd. The comments of the DFFE are as follows:

1.The DFFE, Branch: Fisheries Management has a mandate in the development and management of aquaculture in South Africa, please register the Directorate: Sustainable Aquaculture Management as an Interested and Affected Party (I&AP).

2.The proposed Trans Atlantic Diamonds prospecting right within the concession 7C area falls within the Northern Cape sea-based aquaculture ranching concession area.

3.Diamond Coast Abalone (Pty) Ltd has a valid ranching abalone ranching right and permit issued by the Department. The ranching concession area, NC 4 has the following coordinates [-30.102264 °; 17.185564° (Land side), -30.101241°; 17.154059° (Sea side), -30.432294°; 17.334842° (Land side), -30.432047°; 17.303689° (Sea side)] and has been seeded with abalone.

4.Diamond Coast Aquaculture is a land based facility (location: -30 19' 04.18"; 17 16' 22.19"), abstracting and discharging sea water in the proposed prospecting area. The operator of this facility needs to be consulted to ensure that access is not denied to the coast for servicing their pipes and other operations. Please do ensure that Diamond Coast Abalone is included as and I&AP.

5.The Environmental Impact Assessment process for the proposed prospecting in concession area 7C should consider the

		<p>already approved and seeded aquaculture ranching concession areas for the Northern Cape. The application should consider the necessary specialist studies, such as but not limited to Dispersion Modelling and Marine Ecological Assessments, to assess the impacts of proposed mining application might pose to the seeded abalone ranching concession areas and the aquaculture operations in the area.</p> <p>6.The Department requests that the impact studies investigate the potential impact of heavy metal accumulation and resuspension from the sediments emanating from the mining activity located near the ranching site, which have the potential to impact ranched abalone by accumulating heavy metals in the flesh of the animal.</p> <p>7.It is noted that on pages 8-9 of the document reference is made to the fisheries sector, please consider the above-mentioned comments regarding the aquaculture operations in the area as they may be affected by the proposed activity and would need to be considered.</p> <p>Please note that the Directorate Sustainable Aquaculture Management reserves the right to review and/or provide additional comments in future. Enquiries may be directed to the contact provided at the top of this correspondence</p>	
<p><b>Stakeholder 7</b></p>	<p>23/06/2022</p>	<p>Interim Comment In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999) Attention: Anchor Environmental Consultants</p>	<p>Thank you for the informative comments. We will make sure to consider the listed concerns and suggestion in the final BAR.</p>

(Pty) Ltd Trans Atlantic Diamonds Pty Ltd has applied for the right to prospect for diamonds and other gemstones and precious metals and ferrous and base metals such as rare earths in Sea Concession

Area 7C. This area covers 200 246 ha and extends from 12km south of Hondeklipbaai (southern boundary) to 19km north of Hondeklipbaai (northern boundary).

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Background Information Document (BID) for the proposed Prospecting Rights and Environmental Authorisation to Prospect in the Offshore Sea Concession Area 7C.

As part of the Environmental Authorisation process a Basic Assessment Report and Environmental Management Plan must be completed. SAHRA is pleased to note that the BID has already identified that there may be impacts to Heritage during the proposed project and as such has outlined possible mitigation measures on page 10 of the document. Furthermore, as part of the assessment of the possible impact on heritage, SAHRA requires that a Heritage Impact Assessment (HIA) must be undertaken as part of the project including an evaluation of the likelihood for any shipwrecks being present in the proposed prospecting area. The HIA must include a specialist study of maritime and underwater cultural heritage to be undertaken by a suitably qualified Maritime Archaeologist. In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years in South Africa's territorial waters or maritime

		<p>cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or objects may not be disturbed without a permit from the relevant heritage resources authority. Should anything of archaeological or paleontological significance be exposed during the proposed project, work must cease immediately and SAHRA must be informed of its discovery without delay. In this event, work may not commence until feedback has been received from SAHRA</p>	
<b>Stakeholder 8</b>	01/07/2022	<p>Dear Sir/Madam</p> <p>Please note, you did not provide us with the access link for this project and note that; if you do not provide the access link on time. Then, you will receive your comments late.</p>	<p>Good day,</p> <p>I apologise that you did not receive the link. Please find the BID here: <a href="https://anchorenvironmental.co.za/node/581">https://anchorenvironmental.co.za/node/581</a></p> <p>Please note that this is still the pre-consultation process and that no specialist studies have been conducted, nor has a BAR been compiled yet.</p> <p>This is simply to provide initial comment on the proposed project.</p>