



**PUBLIC PARTICIPATION PROCESS IN SUPPORT OF  
SCOPING AND EIA PROCESS (VERSION 3)**

ENVIRONMENTAL AUTHORISATION APPLICATION IN SUPPORT OF A PROSPECTING RIGHT APPLICATION WITH BULK SAMPLING BY SAMIN GROUP PTY LTD ON UNSURVEYED STATED LAND 440MT & 442MT, AREA OF GUMBU/MASISI, MAGISTERIAL DISTRICT OF MUSINA, LIMPOPO PROVINCE

**(DMR Ref – LP30/5/1/1/2/13050EM)**

**COMMENTS, ISSUES AND RESPONSE REPORT**

**(12 January – 11 July 2018)**

**VERSION 3 – EIA PHASE (FINAL VERSION)**

**DATE OF COMPILATION: 13 JULY 2018**

**PREPARED BY:**

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## 1. Introduction

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Naledzi Environmental Consultants CC (NEC) has been appointed by SAMIN Group Pty Ltd, to undertake and manage an Environmental Impact Assessment (EIA) Study and obtain environmental authorisation for a prospecting right application on unsurveyed state land 440MT and 442MT in the area of Gumbu/Masisi in the Magisterial District of Musina in the Vhembe District Municipality of Limpopo Province.

SAMIN intends to identify if there are economically exploitable concentrations of Brytes, Chrome ore, Coal, Cobalt, Copper ore, Diamond, Gold ore, Graphite, Iron Ore and Nickel ore minerals within the application area. The company will focus its prospecting on a former recognised mineral deposit of graphite, the old Gumbu Graphite Mine. A further eighteen (18) target areas have been identified for prospecting, to search for graphite, metamorphic diamonds, and alluvial diamonds and gold. Prospecting activities will include drilling, trenching, bulk sampling and exploration pits.

The project is subject to a Scoping and EIA Process under the NEMA EIA Regulations of 2014 as amended under GNR 326 of 7 April 2017. The process comprises a Scoping Phase and EIA Phase with a round of public engagement for each phase. The process is subject to the following in terms of the EIA Regulations:

### Scoping Phase

- A Public Participation Process (PPP) in terms of Regulations 40 – 44;
- Scoping Report in terms of Appendix 2;

### EIA Phase

- Environmental Impact Report in terms of Appendix 3;
- Environmental Management Programme in terms of Appendix 4.
- Closure Plan

The public participation process forms the corner stone of the Scoping & EIA Process. The process identifies potential interested and affected parties on the project, solicits inputs and comments pertaining to the activity proposed from such parties. The process is conducted in accordance to Regulation 41 to 44 of the NEMA Regulations. The public is provided access to information which is conveyed through the following methods during the Scoping and EIA process:

### Scoping Phase

- Distribution of background information documents (BID) available for public review and comment
- Public Meeting / Focus Group Meetings/Information Session
- Draft Scoping Report (DSR) which is made available for public review and comment;

### EIA Phase

- Draft Environmental Impact Report & Environmental Management Programme (EIR & EMP) available for public review
- Public Meeting/Information Session/Focus Group Meeting

Public access refers to public review periods on documents prepared for the Scoping & EIA Study. The public registration period on the BID is 30 days and the public review period on the Scoping Report, Environmental Impact Report & EMP is 30 calendar days, respectively.

All the comments and inputs received from I&APs, stakeholders and organs of state during the Scoping&EIA Process are recorded in the Issues and Response Report (IRR). The IRR provides a summary of the issues received and offers a response to the issues raised. As indicated, the public is consulted in two stages of the process and thus the IRR consists of versions. These versions include:

- Version 1 – IRR appended to the updated Scoping Report submitted to DMR
- Version 2 – IRR appended to the draft EIR for public review
- **Version 3 – IRR appended to the final EIR which is submitted to DMR for approval.**

Version 3 of the IRR is appended to the final EIR & EMPR Report and is submitted to the DMR for decision making.

The IRR contains all the comments and inputs received from I&APs, stakeholders and organs of state whether it was raised at meetings, written or verbal, up to the submission of the final EIR to the DMR.

## **2. Issues and Response Report**

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Please refer to page 4 for the summary of issues raised by I&AP's during the Scoping& EIA Phase on the project and responses provided thereto.

Issues and responses solicited during the EIA Process include the following:

- written comments submitted by I&APs during the Scoping & EIA Process,
- issues raised during the project public meeting on 7 February 2018 at Gumbu; and
- a Focus Group Meeting on 12 February 2018 with the South African National Defence Force (SANDF);
- A Focus Group Meeting/Key Stakeholders Meeting on 26 April 2018 with the Limpopo Department of Economic Development, Environment & Tourism (LEDET).
- A Public Meeting on 29 June 2018 at Gumbu with the affected communities;
- Comments submitted by Stakeholders on the draft EIR & EMPr.

Refer to page 34 *Annexure A* for *copies of the written comments as well as completed Comments & Response forms received during the Public Participation Process* to date.

The following comments and issues have been raised during the public participation process for the EIA Study for the period 12 January to 11 July 2018.

NO	Comment	Interested and Affected Party	Date	Response
<b>2.1 Written Comments received during from 12 January to 12 February 2018</b>				
2.1.1	The Madimbo Corridor where the mining/prospecting activity/activities are planned is still managed by the South African National Defence Force (SANDF). Therefore the SANDF is a directly affected party. It must be noted that the project area is required for military training and therefore is not considered safe for civilian activities.	Hennie Davel Regional Environmental Manager SANDF	5 February 2018 Comment Sheet, Draft Scoping Report	Noted. A Focus Group Meeting took place between NEC and SANDF on 12 February 2018 to discuss the issue.  NEC recorded the issues and brought it to the attention of the applicant. It has been recorded in the updated Scoping Report.
2.1.2	Is it necessary for the Limpopo Tourism Agency to attend the public meeting of 7 February 2018? The meeting will deal with environmental aspects and our focus is tourism.	Motlatjo Maselesele Limpopo Tourism Agency Executive Secretary	6 February 2018 Written enquiry via email	The meeting is informative and allows I&APs the opportunity to ask questions and obtain clarity on the project. The meeting is not compulsory. NEC has included the Limpopo Tourism Agency on the project database as the prospecting right area is proposed on land adjacent to the R525 Punda Maria Road leading to the Kruger National Park which is a highly frequented tourist destination.

NO	Comment	Interested and Affected Party	Date	Response
2.1.3	<p>1. Our comments refer to the background information document that was circulated. The draft Scoping Report was not originally circulated, nor is it available on the Naledzi Environmental Consultants website as indicated at the public meeting.</p> <p>2. We sourced the scoping report elsewhere. Please circulate reports via email to I&amp;AP as not all I&amp;AP are able to get to the relevant public libraries to view the report. Ensure that all reports are available on NEC website as indicated.</p> <p>3. The Vhembe Biosphere Reserve aims to bring people and nature together – conserving biodiversity but at the same time recognizing the need for sustainable socio-economic development. We do have some concerns with this particular SAMIN prospecting project – specifically with regards to its location within Critical Biodiversity Areas (irreplaceable) as well as being located just upstream of a World RAMSAR site – the Makuleke Wetlands, which has not been mentioned in your document. As such, we have concerns that SAMIN’s prospecting activities could have detrimental impacts on biodiversity and the aquatic environment upstream of this important area.</p> <p>4.</p>	Cath Vise Coordinator Vhembe Biosphere	12 February 2018 Written comments via email	<p>1. We apologise for this inconvenience. The draft Scoping Report was circulated on 12 and 15 January 2018 to pre-identified interested and affected parties. It was also sent to I&amp;APs who registered after the 12<sup>th</sup> January 2018 on request. It was also placed at public venues in the project area. We were made aware of the website error by Vhembe Biosphere comments. It was a technical error on the website which resulted in the report not uploading. We have since corrected this. The report is available on the website: <a href="http://www.naledzi.co.za">www.naledzi.co.za</a>. We will also place the updated Scoping Report with associated appendices as submitted to the DMR for approval on the website.</p> <p>2. Noted. During the EIA Phase the EIR&amp;EMPr will be circulated via email to I&amp;APs, placed at public venues and will be available on the Naledzi website.</p> <p>3. Comment noted. We have recorded</p>

NO	Comment	Interested and Affected Party	Date	Response
	<p>Please see below a list of comments from our stakeholder group:</p> <p><b>MAPS:</b></p> <ul style="list-style-type: none"> <li>▪ The locality map only shows the coordinates of the boundaries of the area under investigation. The map is stated to be compiled at a scale 1 to 50000, this is not true. The map was compiled using the topographic 1 to 50000 scale maps but was not projected to the 1:50000 scale.</li> <li>▪ Figure 1 was compiled using Google Earth at such a low resolution and high scale that it's almost impossible to determine exactly where their trench lines start and end, and in what sensitive environments these trenches take place in.</li> <li>▪ The maps also do not show trenches in regard to any sensitive areas, with particular reference to Limpopo Conservation Plan and Vhembe Bioregional Plan;</li> <li>▪ Figure 1 clearly shows seven demarked areas earmarked for core drilling exploration. Nonetheless under heading 4 you mentioned that the seven sites earmarked for core drilling will only be determined once the trenching phase has been completed. As a result, an additional environmental impact assessment phase should be included into the proposal which will commence after the trenching phase has taken place and the seven</li> </ul>			<p>the concerns in the Scoping Report and updated the Biophysical environment description. A Biodiversity, Ecological and Aquatic Survey will be undertaken as part of the EIA Process to determine the potential impacts on the features.</p> <p>4. MAPS</p> <p>A Site Plan has been included under Appendix 2 in the updated Scoping Report with the location of the 21 areas targeted for prospecting activities. Each site will be 1 hectare in extent. The target area at the old Gumbu Mine will be 1.5 hectares.</p> <p>The updated Scoping Report includes sensitivity maps which indicate the location of target areas in relation to sensitive environments of the Limpopo Conservation Plan and the Vhembe Bioregional Plan.</p> <p>Since the draft Scoping Report, the applicant has identified all the target areas for prospecting. 21 Target areas have been identified and are included on the Site Plan appended under Appendix 2 of the updated</p>

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	<p>borehole sites have been identified.</p> <p>5.</p> <p><b>AQUATIC ENVIRONMENT:</b></p> <p>From the background information under Heading 7 you make no mention of studying the impact of the proposed prospecting on the aquatic environment. First and foremost, all the proposed trench lines run north-south starting at the Limpopo River. The main question of concern is at what distance from the Limpopo River Riparian Zone do they intend to start their invasive trenching?</p> <p>How do they intend avoiding numerous ephemeral streamlets which cross their trench lines?</p> <p>The above-mentioned concerns are of critical importance as they could have a detrimental effect on the Makuleke Wetlands declared a Ramsar Site downstream from the proposed prospecting area.</p> <p>6.</p> <p><b>REHABILITATION CONCERNS:</b></p> <p>Concerns were raised regarding mining and or prospecting activity where rehabilitation took place reverting the site back to pre-prospecting state (it is impossible). As this prospecting application also targets diamonds, the above, is of extreme concern as alluvial diamonds are known to occur in the</p>			<p>Scoping Report. No additional EIA Process would be/is required. All prospecting activities are addressed within this EIA Process.</p> <p>5. AQUATIC ENVIRONMENT</p> <p>Noted. The impact on natural water bodies / the aquatic environment was an identified impact listed in the draft Scoping Report under identified impacts.</p> <p>Prospecting target areas, based on SAMINS's provided locations, would be located between 400 metres to 1km south of the Limpopo River riparian Zone. There is only 1 target area, no 21 which is located on the north western extreme of the site on the southern banks of the Limpopo River. This target site is however too close and would need to remain 100m away from the river or above the 1: 100 floodline whichever is greater.</p> <p>Target areas in general would need to remain 100m from any drainage line/water course. Yet, there are</p>

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	<p>sedimentary deposits of the Limpopo River.</p> <p><b>7.</b> <b>CONSULTING REQUIRED PLANS:</b> The Background Information Document does not take into account required sensitive areas – in particular reference to Limpopo Conservation Plan and the Vhembe District Bioregional Plan which has recently been released. Also the Scoping Report does not make reference to the UNESCO Vhembe Biosphere Reserve or Vhembe Bioregional Plan. Of critical importance is the Critical Biodiversity Areas that this project falls within.</p> <p>The exact location of trenches and boreholes with respect to these plans has not been indicated, and this should be done to facilitate further informed response.</p> <p>This is an incredibly sensitive area and they must be made to take account of all regulations, plans and knowledge, especially considering the riparian forest and pans.</p> <p><b>SOCIAL IMPACTS:</b> We did not see reference to the potential negative social impacts associated with development. This would include migration of people into the area, especially contract workers</p>			<p>currently 4 target areas requiring exploration pits (2mx2mx2m deep/pit) in search of alluvial diamond to be located in old river channels. This will be confirmed in the draft EIA Report.</p> <p>A Biodiversity, Ecological and Aquatic Survey will be undertaken as part of the EIA Process to determine the potential impact of prospecting activities on aquatic environments/ drainage lines and the adjacent Maluleke Wetland. The findings of the survey will be included in the Environmental Impact Report.</p> <p><b>6. REHABILITATION CONCERN</b></p> <p>Based on the 21 areas targeted for prospecting, none of the target areas are located within the Limpopo River. Target areas prone for exploration will take place in old river/drainage channels on site. Target area no 21 is the only target area located within the Limpopo River Riparian zone. This would</p>



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	<p>from elsewhere or people coming to the area in search of work. Possible social impacts include an increase in crime, with particular reference to violent crimes against women.</p> <p>In addition, there is also potential impact on roads due to increased traffic to the area – with risk of both wildlife and livestock (free roaming in this environment) being hit by vehicles with associated impact on livelihoods.</p> <p>Also refer to air quality impacts, and associated potential health implications from increased dust etc. in the air.</p> <p>I hope these comments will assist you with your Scoping Report going forward, to ensure that all concerns are taken into account when decision making takes place regarding this application.</p>			<p>need to be reconsidered / alternative considered due to the target area sensitivity. In general target areas need to remain 100m away from the river or above the 1:100 year flood line, whichever is greater.</p> <p><b>7. CONSULTATING REQUIRED PLANS</b></p> <p>Noted. The Scoping Report has been updated to include the UNESCO Vhembe Biosphere Reserve and Vhembe Bioregional Plan under the description of the Biophysical environment and under Policy and Legislative requirements.</p> <p>Sensitivity maps have been included in the updated Scoping Report which indicates the position of target areas in relation to priority biodiversity areas identified in the Limpopo Conservation Plan and Vhembe Bioregional Plan.</p> <p><b>8. SOCIAL IMPACTS</b></p> <p>Please note this is an application for a prospecting right, not a mining license. The social impacts referred</p>

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				<p>to are related mostly to development and operation of a mine. For now the applicant is only seeking to conduct a prospecting programme to identify if there is a viable mineral deposit and at which quality and quantity it would be available within the application area.</p> <p>The potential impacts of increased traffic, dust increase will be negative social impacts are noted and will be considered in the EIA Report.</p>
2.1.4	After reviewing the Background Information Document for the prospecting right application by SAMIN around Gumbu, we identified the need to conduct a site inspection before commenting. Please confirm if a site can take place on 26 February 2018. Kindly inform us if the site inspection can be scheduled.	M.P. Taka Department of Water & Sanitation Scientist: Water Use Authorisation, Limpopo North West Proto CMA	14 February 2018 Emailed request to NEC	A site inspection will be scheduled with the Department of Water & Sanitation to the project site, once the EIR is available for comment.
2.1.5	We have been made aware that there is currently an EIA process underway for the prospecting right in the Gumbu owned Madimbo area. What is the current status of the EIA process?	Piet Theron  Great Limpopo Transfrontier Conservation Area (GLTFCA)  International	15 February 2018 Written comments via email	The EIA Process is currently in the Scoping Phase in which issues are scoped to focus the EIA Study on. A public registration and comment period on the Background Information Document and draft Scoping Report was provided from 12 January to 12 February 2018. A public meeting took place at the

NO	Comment	Interested and Affected Party	Date	Response
		Coordinator		<p>Gumbu Primary School on 7 February 2018 to facilitate further comments on the project from I&amp;APs.</p> <p>We are currently updating the Scoping Report for submission to the DMR in on order to get approval to continue to the EIA Phase of the process. A second round of public consultation will follow in which the EIA Report and Environmental Management Programme would be made available for public review.</p> <p>NEC sent the GLTFCA the Naledzi website link to access all the public documents (BID, draft Scoping Report) for the prospecting right application by SAMIN.</p>
2.1.6	One of the local community members told me that SAMIN has already started with the exploration drilling in the area - is this true?	Piet Theron Great Limpopo Transfrontier Conservation Area (GLTFCA) International	15 February 2018 Written comments via email	SAMIN has not started with any exploration drilling. The contracted Geologist has gone to site to determine the target areas for prospecting, based on their surface geological mapping and literature review of the area. This was conducted in January 2018.

NO	Comment	Interested and Affected Party	Date	Response
		Coordinator		
<b>2.2 Comments and Responses recorded at the Public Meeting of 7 February 2018</b>				
2.2.1	<p>Why was the Gumbu Mine closed down?</p> <p>The study area is very dry, where will the mine obtain water from?</p> <p>Will the mine abstract water from the Limpopo River? If so how many litres?</p> <p>What is the total area to be used for mining /prospecting?</p>	Sandra Visagie Kruger National Park Section Ranger - Pafuri	7 February 2018 Scoping Phase Public Meeting Gumbu	<p>Zimbabwe fights were the reason behind mine closure. Employees were no longer safe from terrorist attacks.</p> <p>The application submitted to the DMR is for a prospecting right not a mining license. The prospecting activities will not require much water, mainly for domestic purposes. Any water requirements would be brought to site by the contractors.</p> <p>SAMIN will prospect on an area of 4000 hectares.</p>
2.2.2	We as a community have a problem with the Kruger National Park, since it does not employ local people. We would like to request the SAMIN Group to employ local youth during its operations at the project site.	Samuel Sigebe	7 February 2018 Scoping Phase Public Meeting Gumbu	<p>The current application by Samin Group is for a prospecting right. There are limited prospects for job opportunities during the prospecting programme.</p> <p>Job opportunities would only be created if a mine is established and</p>

NO	Comment	Interested and Affected Party	Date	Response
				operational.
2.2.3	The application area was claimed back for development and we want the proposed mining project to be approved in order for it to create job opportunities for the local people. The SANDF does not employ local people.	Munzhelele Vhulahani	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.4	The Lord must open the way for this proposed development.	Luvhimba David Mphodo	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.5	We welcome the project because it will benefit the community.	Nndwamato Thetshelesani	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.6	All community members must stand up and applaud to show that we welcome the proposed project.	Mr Mudau	7 February 2018 Scoping Phase Public Meeting Gumbu	The motion was supported and community members applauded.
2.2.7	The project will assist to combat crime caused by unemployment in the area, since the project will employ people.	Tshikovhi Humbulani	7 February 2018 Scoping Phase Public Meeting Gumbu	The current application by Samin Group is for a prospecting right. There are limited prospects for job opportunities during the prospecting programme.  Job opportunities would only be

NO	Comment	Interested and Affected Party	Date	Response
				created if a mine is established and operational.
2.2.8	SAMIN should continue with the project. The EIA Process is timeous and the community must be patient. The title deed issues need to be addressed so that the community can take over from the SANDF.	Mahwasane Mudzweda	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.9	What will be the planned mining period and how many people will be employed?	Tshimangadzo Brestons	7 February 2018 Scoping Phase Public Meeting Gumbu	The current application is for a Prospecting Right not a mining licence.  The question relates to actual mining. The mining period and number of people to be employed if the mine is developed is unknown at this stage since the quantities of minerals will only be known after the prospecting phase.
2.2.10	I would like SAMIN Group to proceed with the proposed development.	Mphondo Agnes	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.11	I would like this project to proceed. Four groups of mining companies have tried to prospect in the area before, however did not succeed. I worked with and lived with Elmer's father.	William Gumbu	7 February 2018 Scoping Phase Public Meeting	Comment noted.

NO	Comment	Interested and Affected Party	Date	Response
			Gumbu	
2.2.12	I never thought that there were still white people who did not want development. The Kruger National Park does not employ the youth. The community believes that SAMIN mine will bring employment.	Phaswana Itani	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment Noted. The current application by Samin Group is for a prospecting right. There are no prospects for job opportunities during the prospecting programme. Job opportunities would only be created if a mine is established and operational.
2.2.13	Many people will still try to intimidate SAMIN Group and discourage them from prospecting. The unexploded bombs the SANDF state still to be scattered onsite have been swept away. I was part of the workforce who swept the area for UXO's.	Sidzhie Daniel	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.14	Sammin Group should consult the environmental and water departments since they can frustrate mining companies. I experienced this whilst working for Vele Mine.	Moyana Nnduvheni Philemon	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted. The Department of Water & Sanitation and Limpopo Department of Economic Development, Environment and Tourism are being consulted as part of the EIA Process.
2.2.15	Can a community member without a university qualification be employed in a higher position during the mine operation stage?	Magovha Pfarelo	7 February 2018 Scoping Phase Public Meeting Gumbu	RR from SAMIN responded, once a mine is established, people would be employed as per their qualifications and expertise. There will be an entity

NO	Comment	Interested and Affected Party	Date	Response
				which would deal with employment issues. The lower income/poor people will be employed in numbers.
2.2.16	<p>We were excited to hear about the proposed development. The community members should not fight amongst each other and take account of groups which will oppose the proposed development. If any of the community members do not understand the project detail provided, they should ask questions for clarity as soon as possible to avoid frustrations with the proposed development.</p> <p>Sandra Visagie from the Kruger National Park protects animals. The community must let her continue with her job, but she must not frustrate the community by being against the proposed development. The SANDF will also try to frustrate the community with the issue of unexploded bombs still present on the project site. Drilling companies only drill up to 10m or 15m for boreholes which shows that there is more water around Gumbu area, but water will be monitored as per Mrs. Visagie's input.</p>	M.J. Mariba DA Councillor	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
<b>2.3 Issues raised by SANDF during a Focus Group Meeting on 12 February 2018</b>				
2.3.1	<p>The SANDF oppose the proposed prospecting right application due to the following reasons:</p> <ul style="list-style-type: none"> <li>▪ The land has been used for military training since</li> </ul>	Lt Cl. Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	All comments have been noted. DM from NEC responded the aim of the public participation is to record all issues from interested and affected



NO	Comment	Interested and Affected Party	Date	Response
	<p>1960's and is currently registered under the Department of Public Works.</p> <ul style="list-style-type: none"> <li>▪ SANDF spent R 100 billion to sweep/clean the area from land mines so land could be used for agricultural purposes.</li> <li>▪ There are still landmines present in the area, to depths of 4m below ground. A civilian was killed whilst handling a land mine for the purpose of collecting it for scrap metal. The area is not safe yet.</li> <li>▪ The Madimbo Corridor is the only base available to the SANDF for training. There is continuous training in the corridor.</li> <li>▪ The project site is a declared Nature Reserve</li> <li>▪ The project area still needs to be cleaned / swepted for further concealed unexploded bombs (UXO's).</li> <li>▪ Rumours indicate ammunition was dumped into the old Gumbu Mine.</li> <li>▪ Only the western side from Beacon 5 towards Musina would have been given back to the community, as it has been cleaned from all UXO's</li> <li>▪ Vigorous training is still undertaken on the eastern side of Beacon 5.</li> <li>▪ A land claim has been lodged against the project site, and is yet to be finalised.</li> </ul>			<p>parties and to address such through the EIA Process to assist the DMR in decision making.</p> <p>NEC is aware that the prospect site is registered under the National Department of Public Works (DPW). The DPW is a registered I&amp;AP on the project database. NEC informed the DPW, Property Manager of Facilities, Mr. Yuza Siwela of the application. The project Background Information Document, Notification letter including the availability of the draft Scoping Report was emailed to the DPW on 16/01/2018.</p> <p>NEC takes note of the project site being a nature reserve; it falls within the Vhembe Biosphere Reserve which is a UNESCO biosphere reserve. The impact on biodiversity will be considered in the EIA Process.</p> <p>The unsafe nature of the eastern portion of the project site will be</p>

NO	Comment	Interested and Affected Party	Date	Response
				<p>recorded in the Scoping Report and made known to the applicant and decision making authority.</p> <p>NEC has obtained Land Claim results on 10/01/2018 from the Commissioner on Restitution on Land Rights. The results stipulate the claimants of the land are Gumbu, Masisi, Tshenzelani, Sigonde Community, Mutale Community. Yet it states the claim has been settled. NEC will reconfirm the status with the Commissioner.</p>
2.3.2	The National Department of Public Works, Mr Siweya needs to be notified of the application since the DPW is the current landowner of the area under claim.	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	Please refer to point 2.3.1 for response.
2.3.3	What volumes of sampling will be taken at the site?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	<p>The legal maximum allowed volume for bulk sampling is 500 000 tons/annum. The old Gumbu Mine is the only current target area selected for bulk sampling at 500 000 tons/annum.</p> <p>The other target areas for</p>

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				prospecting would include trenching, with an extent of 1m x 1m x 20m long/ trench. Most target areas will comprise 5 trenches. The volumes of material excavated from each target site would vary from 30m <sup>3</sup> up to 280m <sup>3</sup> . The average volume of excavation would be 100m <sup>3</sup> .
2.3.4	Would a mining permit be applied for after the prospecting phase?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	The applicant would apply for a mining permit from the DMR should the prospecting programme yield positive results.
2.3.5	What will be implemented to close the trenches opened during bulk sampling?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	A Rehabilitation Plan will be prepared with measures to be implemented at the end of the prospecting phase.
2.3.6	Will sampling of soil be done on site?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	SAMIN Group intends sampling the soils at labs.
<b>2.4 Issues raised during the commencement of the EIA Phase</b>				
2.4.1	Your attention is drawn to the fact that the Madimbo Corridor is a proclaimed nature reserve and prospecting and mining activities are prohibited in protected areas. The application	Lt Cl Hennie Davel SANDF Regional EM	Emailed comment 11/03/2018	Noted. The protection status of the land has been brought to the attention of the applicant. The

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	area was declared as the Matshakatini Nature Reserve under the Transvaal Nature Conservation Ordinance of 1983.			National Environment Management Protected Areas Act of 57 of 2003 (NEMPAA) prohibits the activity in a protected area. NEC and Samin engaged with the Limpopo Department of Economic Development, Environment & Tourism in this regard on 26 April 2018. The applicant wishes to continue with the application and motivate de-proclamation of the land with the consent of the Vhembe CPA.
2.4.2	Official comments from the SANDF Ammunition Division are still pending for submission to NEC. But we bring it to the attention of NEC that the Madimbo Corridor is not safe for civilian activity or prospecting activities, aside from the land's protection status. SANDF undertakes training within military corridor. Also there is a major safety risk due to the existence of UXO's within the military corridor. The SANDF has only conducted limited sweeping and clearing of UXO's in some of the area in the corridor, up to a depth of 1 metre. If the land is to be used for prospecting clearing/sweeping for UXO's is required up to a depth of 4 metres. This sweeping exercise will come with a significant cost. Hence prospecting	Captain (SAN) Adri Liebenberg SANDF	Verbal Comment Via telephonic conversation 20 April 2018	Comment noted. NEC has brought this to the attention of the applicant. The applicant has requested the SANDF to provide a list of requirements that need to be undertaken to make the area safe for prospecting.

NO	Comment	Interested and Affected Party	Date	Response
	in this area is not possible. It is not safe to conduct prospecting activities as it may result in machinery unearthing and detonating UXO's and this is a major safety risk for the Defence Force.			
<b>2.5 Focus Group Meeting with LEDET on 26 April 2018 regarding the Protection Status of the application area (LEDET, Samin, NEC and Vhembe CPA)</b>				
2.5.1	<p>Lt Col Hennie Davel (SANDF) informed LEDET of the application lodged against the proclaimed nature reserve. NEMPAA prohibits prospecting and mining within protected areas. LEDET communicated the proclamation to NEC.</p> <p>The only avenue available to the applicant to prospect/mine on the land is to de-proclaim the nature reserve. The MEC for LEDET is mandated to de-proclaim protected areas. The applicant would need to convince the MEC to de-proclaim the land to allow proposed prospecting activities.</p>	Christiaan Visagie LEDET: Protected Areas Division	Verbal Comments FGM 26 April 2018	<p>The project BID and Scoping Report was submitted to LEDET: Environmental Impact Management as notification. The documents were available for public review from 12 January until 12 February 2018.</p> <p>Noted. The proclamation was received and NEC advised the applicant accordingly.</p> <p>Noted.</p>
2.5.2	When was the application area proclaimed as a nature reserve? Is the entire area affected by the proclamation? In 2004 the land was restored to the Vhembe CPA. LEDET must	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	The land was declared in 1983 and proclaimed in 1992. The entire Madimbo Corridor is affected. A

NO	Comment	Interested and Affected Party	Date	Response
	provide the CPA with a copy of this proclamation.			copy of the proclamation was emailed to attendees along with the minutes of the FGM of 26 April 2018.
2.5.3	How is the SANDF still able to conduct military training within the nature reserve?	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	NEC response: The SANDF is managing the land as a conservation area and military corridor. SANDF is managing the corridor through a 99 year lease agreement with the National Department of Public Works.
2.5.4	What are the implications of this proclamation if the Vhembe CPA is given their land back? The claim was already finalised in 2004.	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	NEC note: According to the DRDLR the communities will be entitled to the land yet not able to live and cultivate it. The land will remain protected as a conservation area and military corridor. The intent is to compensate the claimants and continue with the use of the land as a military training ground.  Christiaan Visagie from LEDET responded that issues raised by SAMIN and Vhembe CPA should be used as motivation to convince the

NO	Comment	Interested and Affected Party	Date	Response
				MEC to de-proclaim the land.
2.5.5	How was it possible in 2008 and 2011 for prospecting rights to be issued to mining companies within the proclaimed area? Why did LEDET not raise this issue then?	Caroline Mulaudzi Director – Samin Group	Verbal Comments FGM 26 April 2018	Christiaan Visagie responded LEDET was not aware of the application in 2008 and 2011. The DMR is the competent authority who issued the prospecting right to the mining companies. Samin is to direct these issues in writing to LEDET so the relevant divisions can provide responses.
2.5.6	There are 400 proclaimed nature reserves from 1960 onwards that have issues with the current land use and agriculture is an example. LEDET has legal challenges to solve the issues around the status of these areas.	Christiaan Visagie LEDET: Protected Areas Division	Verbal Comments FGM 26 April 2018	Noted.
2.5.7	What did LEDET do regarding these land use issues in protected areas?	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	Christiaan Visagie from LEDET responded that nothing has been done about the verification of areas, as legal opinion is awaited from DEA. Fact is NEMPAA recognises these areas as protected and development is prohibited in protected areas.

NO	Comment	Interested and Affected Party	Date	Response
2.5.8	There are no economic activity or job opportunities in the project area. Communities are suffering as a result. The leadership needs to come to the party.	Elmer Uys Director – Samin Group	Verbal Comments FGM 26 April 2018	Christiaan Visagie from LEDET responded Samin should send these motivations directly to the MEC. The MEC will request the different units within LEDET to respond. Samin has a valid argument. De-proclamation of the area will be beneficial to the local communities. LEDET is not against development. It understands people require job opportunities and economic development, yet has to abide by the law to protect the environment. LEDET supports sustainable economic development.
<b>2.6 Public Meeting at Gumbu on 29 June 2018 to facilitate comments on the draft EIR&amp; EMPR</b>				
2.6.1	Why did no one come forward with these issues when the Land Claim for the Madimbo Corridor was gazetted? The SANDF hired contractors to sweep the area of any dangerous unexploded ammunition. How can it still be said that the area is unsafe for civilian activity?	D. M Luvhimba	10 July 2018 Public Meeting Gumbu	MB from NEC responded the military did sweep the area in 2012 but only on the surface not below surface. Prospecting activities would venture below surface. There is a risk of unearthing these unexploded ammunition during prospecting. The SANDF states for the area to be safe for prospecting it needs to be cleared



NO	Comment	Interested and Affected Party	Date	Response
				down to 4 metres below ground level. Even then it cannot be guaranteed that the area is safe.
2.6.2	<p>Why is the SANDF indicating the area must be swept down to 4 metres below ground level? Who informed NEC of this requirement and for what reason? The SANDF is conducting training on the eastern side but what about the western side?</p> <p>What is the condition of the Makuleke wetland? How does this wetland benefit the community?</p>	A. Siphuga	10 July 2018 Public Meeting Gumbu	<p>MB from NEC repeated the clearance requirements to allow prospecting and that the SANDF informed NEC through a focus group meeting on 12 February 2018 and through written submissions.</p> <p>Currently the SANDF is conducting training within the entire military corridor.</p> <p>The Makuleke Wetland is an internationally protected wetland, a Ramsar site. It is in a good condition. It is not located on the application area but next to it in the Kruger National Park. The unmapped wetlands and forest in the north eastern section of the site drain to this wetland. Therefore to avoid impact such as siltation or any potential spillages no prospecting can be undertaken in the north eastern section of the application area. But only 1 target area was</p>

NO	Comment	Interested and Affected Party	Date	Response
				located in this part of the project site. It has been omitted from the site plan. The main target for prospecting is located at the old Graphite Mine.
2.6.3	<p>We have allowed the soldiers on our land, but we do not want them here anymore.</p> <p>How will the graves be protected during prospecting?</p> <p>Samin Group must pay the leadership royalties when they start mining at Gumbu.</p>	Oscar Ramphabana	10 July 2018 Public Meeting Gumbu	<p>Noted.</p> <p>MB from NEC responded that the Heritage Impact Assessment recommends that heritage sites are avoided. The fact that these have been identified and mapped in relation to the target areas already creates awareness. These locations have been documented in the EMPR for the project. The prospecting crew would need to uphold a 50 buffer zone from heritage sites. Secondly it is recommended that the heritage specialist first scan the target areas for prospecting to ensure that no damage is to come to the identified sites.</p> <p>CM from Samin noted the comment.</p>
2.6.4	<p>There was a graphite mine here at Gumbu some years ago. How were they able to mine at Gumbu then? Where did the mine source its water from then? It sounds as if the environmental team is giving the SANDF more attention than</p>	Itani Phaswana	10 July 2018 Public Meeting Gumbu	<p>MB from NEC responded that the old Graphite Mine was operated from 1942 to the 1970's. Back then the land was not proclaimed as a</p>

NO	Comment	Interested and Affected Party	Date	Response
	the community.			<p>nature reserve. The nature reserve was only proclaimed in the 1990's. Now that the prospecting activities are proposed the land is a proclaimed nature reserve. It was further explained that the mine pumped water from the Limpopo River via a pipe and pump system.</p> <p>Please note we are independent and these are legal provisions relevant to the application area. This is not determined by the environmental team. We are merely putting the facts forward.</p>
2.6.5	The Defence Force has been on the land for a long time. What has the SANDF done for the community so far? How do we benefit from them being on our land?	Lucky Makamu	10 July 2018 Public Meeting Gumbu	MB from NEC responded that the SANDF still has a long term lease agreement on the land. The intention of the SANDF is to continue training within this area yet on the eastern section of the site. The community will benefit from a lease agreement between the Vhembe CPA and the SANDF.

NO	Comment	Interested and Affected Party	Date	Response
2.6.6	Naledzi must include the community when they meet again with the SANDF. The community is need of job opportunities. We want to talk to the SANDF. They must not stop this project.	A.C Mudau		DM from NEC noted the comment and pointed out that the public participation process is open to anyone to participate. The SANDF requested a meeting with NEC in Polokwane to raise their issues of concern as they were not able to attend the public meeting of 7 February 2018. They are also invited to all the same meetings as the community and vice versa.
2.6.7	We started this land claim we know all the trials. Invite whoever denies us and we can go to the Constitutional Court. We know about the Rhinos that are being stolen. We claimed this land we know everything.	M Mudzweda	10 July 2018 Public Meeting Gumbu	Noted.
2.6.8	What will benefit the community more? The SANDF on our land or by having a mine on our land?  We need the job opportunities from this proposed mine.	Brian Nelunguda	10 July 2018 Public Meeting Gumbu	Noted.
2.6.9	The Department of Public Works is stepping on breaks. This is our land.	Rosina Munyai	10 July 2018 Public Meeting Gumbu	Noted.
2.6.10	There has always been a mine here at Gumbu. The soldiers are allowing illegal export of things. What are they doing?	Takalani Gumbu	10 July 2018 Public Meeting Gumbu	DM responded NEC cannot comment on this issue.

NO	Comment	Interested and Affected Party	Date	Response
2.6.11	The SANDF should not trouble us. They can move off our land anytime. The mine shafts will definitely avoid the protected trees.	Johannes Gumbu Headman of Gumbu	10 July 2018 Public Meeting Gumbu	Noted.
2.6.12	We want this mine to be opened. The SANDF must go away from this land.  Why does the SANDF not clear the bombs from the area? Let the SANDF sweep the area for the bombs.	NW Gumbu	10 July 2018 Public Meeting Gumbu	Noted.
2.6.13	Next time, let us invite more people to the meeting.	Councillor Mariba (DA)	10 July 2018 Public Meeting Gumbu	DM from NEC responded that the entire area was notified of the meeting through the advertisement in the Limpopo Mirror on 8 June 2018. All the headman were notified and we placed site notices in the area. Due process has been followed to inform the communities of the project. Remember this is a prospecting application not a mining license. For now the public inputs would be incorporated into the EIR& EMPR and submitted to the DMR for decision making.

NO	Comment	Interested and Affected Party	Date	Response
<b>2.7 Written comments received from key Stakeholders during the EIR&amp;EMPr public review period from 11 June to 11 July 2018</b>				
2.7.1	The registered landowner is the DPW. The land is used by SANDF and is a restricted military training area under auspices of Defence Act of 2002. The land poses a threat to human life. The land was cleared for unexploded ammunition in 2012 to cover surface clearance not sub-surface clearance. MPRDA through Section 48 prohibits prospecting in respect of land used for government purposes. The land is a declared nature reserve.	Brig GEN SJM Motau General Officer Commanding Defence Works Formation: MAJ GEN SANDF  Captain (SAN) Adri Liebenberg SANDF	28 June 2018 Official Written Comments	The DPW has been consulted during the EIA Process. The safety risk of the land has been highlighted in the EIR&EMPR. The current legislation which prohibits prospecting on the land has been highlighted in the EIR&EMPR. The decision lies with the DMR to either approve or reject the application.
2.7.3	The land is a declared nature reserve with the implication that no prospecting or mining can take place. It is unclear why the application process is going ahead.	Christiaan Visagie LEDET: Protected Areas Division	10 July 2018 Emailed Comment	Inline with the 2007 Land use and Development Plan for Madimbo Corridor, core economic activities identified for the study site include farming (crop and cattle) and mining. Mining required further investigation into the availability of an economic resource. If the prospecting activities prove that the mineral deposit can be optimally mined at the subject land it becomes a viable land use option for the Gumbu/Mutale community. Mining can contribute to the local economy as well as generate much needed

NO	Comment	Interested and Affected Party	Date	Response
				<p>employment for the local community. There is a lack of economic activity and job opportunities at Gumbu.</p> <p>Considering the economic status quo of the Gumbu area and the quest by the Gumbu/Mutale community to find a viable land use option for their newly awarded land, the protection status and reservation of the land for government purposes sterilises the potential minable mineral resource.</p> <p>It is for these purposes that Samin have followed through with the application for a prospecting right and environmental authorisation on the subject land.</p>
	The land was awarded to Gumbu/Mutale community. The property will be restored to the community in title to them. The land is used by SANDF for military operations. Stakeholder negotiations regarding continued leasing and use of the land by SANDF, after transfer of the property to the community, is on-going.	CP Senosha Office of Regional Land Claims Commission: Limpopo	29 June 2018 Official written comment	Noted. This has been highlighted in the EIR&EMPR for consideration by the DMR.
	The Waste Management, Parks and Recreation section of the municipality does not object to the application. The applicant is advised to be in contact with the municipality on how it is	Rendani Kutama Musina Local Municipality	10 July 2018 Official written comments	The management of general waste has been addressed in the EMPR and presented in the mitigation measures

NO	Comment	Interested and Affected Party	Date	Response
	going to handle their general waste during prospecting.			under Appendix 5 Risk Assessment of the EIR document.



### 3. Conclusion

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This Issues and Response Report has been prepared by Naledzi Environmental Consultants CC for the prospecting right application by Samin Group Pty Ltd in respect of unsurveyed state land 440MT and 442MT located in the Madimbo Corridor at Gumbu, Magisterial District of Musina in the Vhembe District Municipality of Limpopo Province.

The Issues and Response Report has been updated on 8 May 2018, 29 May 2018 and 13 July 2018 and it records all written issues and responses received from interested and affected parties during the Scoping&EIA Process. It is the third and final issue or Version 3 attached to the final EIR & EMPR submitted to the DMR for decision making.

The report has been prepared by:



.....  
Marissa Botha (Pr.Sci.Nat)  
*Environmental Assessment Practitioner*  
*For Naledzi Environmental Consultants CC*  
*Registered Professional Natural Scientist with SACNASP (registration number 117526)*

**WRITTEN COMMENTS RECEIVED FROM I&APS DURING  
SCOPING & EIA PROCESS**

**Please note written comments received on the draft EIR&EMPR from stakeholders have been included under Appendix 3K of the main EIR document.**

**RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Marissa Botha

**Sent:** 05 January 2018 07:48 PM  
**To:** Tracy Petersen [tracy.petersen@sanparks.org]  
**Attachments:** Comment & Registration Fo~1.docx (36 KB)

Dear Tracy,

Herewith please find attached as request a Comments and Registration Form.

Regards,  
Marissa Botha  
for Naledzi Group Pty Ltd  
(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)  
145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699  
Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700  
Tel: 015 296 3988  
Fax: 015 296 4021  
Cell: 084 226 5584

---

**From:** Tracy Petersen [tracy.petersen@sanparks.org]  
**Sent:** 05 January 2018 02:55 PM  
**To:** Marissa Botha  
**Cc:** Nicholus Funda; Leonie Du Plessis; Tinyiko Golele; Garth Holt; Eddie Riddell; Navashni Govender; Marisa Coetzee  
**Subject:** FW: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Dear Marissa

On behalf of the Kruger National Park, I would like to register as I&AP for this very important prospecting application. Could you kindly please forward to me the comment and registration form for completion. Thank you.

Comments will be submitted on perusal of the relevant documents as they become available.

Kind Regards

Tracy

Please note that my cell phone number has changed: 071 432 7040

Tracy-Lee Petersen  
Strategic Conservation Planner and Environmental Manager  
KRUGER NATIONAL PARK  
SOUTH AFRICAN NATIONAL PARKS  
Cell: 071 432 7040  
PO Box 394  
Skukuza  
1350  
E-mail: [tracy.petersen@sanparks.org](mailto:tracy.petersen@sanparks.org)

Web: [www.sanparks.org](http://www.sanparks.org)

---

**From:** Marissa Botha [<mailto:botham@naledzi.co.za>]  
**Sent:** 04 January 2018 01:18 PM  
**To:** Garth Holt  
**Subject:** RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Garth,

Herewith is a Stakeholders Notification letter and Background Information Document in respect of the EIA Study for the SAMIN Prospecting Right Application. It will provide more detail on the project to decide who would be the responsible person.

Regards,  
Marissa Botha  
for Naledzi Group Pty Ltd  
(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)  
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---

**From:** Marissa Botha  
**Sent:** 04 January 2018 12:37 PM  
**To:** [garth.holt@sanparks.org](mailto:garth.holt@sanparks.org)  
**Subject:** Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day Garth,

Our telephonic conversation refers.

We have been appointed by SAMIN Group Pty Ltd to conduct an EIA Study for a Prospecting Right Application with bulk sampling on unsurveyed stated owned land 440MT and 442MT located at Gumbu. See attached Google image.

The proposed PR area, as per the map, is just east of the KNP Far North Section area of Pafuri/ Makuleke Wilderness Concession.

Although its only a PR application and not a mining application, we would like to inform the KNP of the application which has been lodged by SAMIN to the Department of Mineral Resources: Limpopo Office.

Can you assist by providing the correct contact person which we are to consult with in this regard as part of our Public Participation Process for the EIA Study?

Your assistance would be appreciated.

Regards,  
Marissa Botha  
for Naledzi Group Pty Ltd  
(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)  
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---

**FW: Naledzi: EIA Study for Prospecting Right Application  
(Gumbu/Madimbo area)**

Tracy Petersen [tracy.petersen@sanparks.org]

**Sent:** 05 January 2018 02:55 PM**To:** Marissa Botha**Cc:** Nicholus Funda [Nicholus.Funda@sanparks.org]; Leonie Du Plessis [leonie.duplessis@sanparks.org]; Tinyiko Golele [Tinyiko.Golele@sanparks.org]; Garth Holt [garth.holt@sanparks.org]; Eddie Riddell [Eddie.Riddell@sanparks.org]; Navashni Govender [navashni.govender@sanparks.org]; Marisa Coetzee [Marisa.Coetzee@sanparks.org]**Attachments:** Background Information Doc~1.pdf (1 MB) ; Stakeholder Notification I~1.pdf (437 KB) ; Locality Map.pdf (1 MB) ; Locality Map - SA Road Map.pdf (1 MB)

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Comments will be submitted on perusal of the relevant documents as they become available.

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Regards,  
[Marissa Botha](#)  
for Naledzi Group Pty Ltd

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views or opinions presented in this email are solely those of the author and do not necessarily represent those of SANParks. Any actions taken on the basis of this email are at the reader's own risk. 6) Other: The sender of this email is expressly required not make any defamatory statements. Any such communication is contrary to SANParks policy and outside the scope of the employment of the individual concerned. SANParks will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages or other liability arising. Thank you.  
South African National Parks 643 Leyds Street, Muckleneuk, Pretoria, South Africa

---



**RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Tracy Petersen [tracy.petersen@sanparks.org]

**Sent:** 09 January 2018 07:29 AM

**To:** Marissa Botha

**Attachments:** Comment Registration For~1.docx (36 KB)

Dear Marissa

Thank you for the registration form – please find attached.

I will send you some comments once I have consolidated them from my colleagues here in the Kruger Park.

Many thanks.

Kind Regards

Tracy

Please note that my cell phone number has changed: 071 432 7040

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Strategic Conservation Planner and Environmental Manager  
KRUGER NATIONAL PARK  
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Web: [www.sanparks.org](http://www.sanparks.org)

---

**From:** Marissa Botha [mailto:[botham@naledzi.co.za](mailto:botham@naledzi.co.za)]

**Sent:** 05 January 2018 07:49 PM

**To:** Tracy Petersen

**Subject:** RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Dear Tracy,

Herewith please find attached as request a Comments and Registration Form.

Regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

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**From:** Tracy Petersen [tracy.petersen@sanparks.org]

**Sent:** 05 January 2018 02:55 PM

**To:** Marissa Botha

**Cc:** Nicholus Funda; Leonie Du Plessis; Tinyiko Golele; Garth Holt; Eddie Riddell; Navashni Govender; Marisa Coetzee

**Subject:** FW: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Dear Marissa

On behalf of the Kruger National Park, I would like to register as I&AP for this very important prospecting application. Could you kindly please forward to me the comment and registration form for completion. Thank you.

Comments will be submitted on perusal of the relevant documents as they become available.

Kind Regards

Tracy

Please note that my cell phone number has changed: 071 432 7040

Tracy-Lee Petersen

Strategic Conservation Planner and Environmental Manager

KRUGER NATIONAL PARK

SOUTH AFRICAN NATIONAL PARKS

Cell: 071 432 7040

PO Box 394

Skukuza

1350

E-mail: [tracy.petersen@sanparks.org](mailto:tracy.petersen@sanparks.org)

Web: [www.sanparks.org](http://www.sanparks.org)

---

**From:** Marissa Botha [<mailto:botham@naledzi.co.za>]

**Sent:** 04 January 2018 01:18 PM

**To:** Garth Holt

**Subject:** RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Garth,

Herewith is a Stakeholders Notification letter and Background Information Document in respect of the EIA Study for the SAMIN Prospecting Right Application. It will provide more detail on the project to decide who would be the responsible person.

Regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021  
Cell: 084 226 5584

---

**From:** Marissa Botha  
**Sent:** 04 January 2018 12:37 PM  
**To:** [garth.holt@sanparks.org](mailto:garth.holt@sanparks.org)  
**Subject:** Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day Garth,

Our telephonic conversation refers.

We have been appointed by SAMIN Group Pty Ltd to conduct an EIA Study for a Prospecting Right Application with bulk sampling on unsurveyed stated owned land 440MT and 442MT located at Gumbu. See attached Google image.

The proposed PR area, as per the map, is just east of the KNP Far North Section area of Pafuri/ Makuleke Wilderness Concession.

Although its only a PR application and not a mining application, we would like to inform the KNP of the application which has been lodged by SAMIN to the Department of Mineral Resources: Limpopo Office.

Can you assist by providing the correct contact person which we are to consult with in this regard as part of our Public Participation Process for the EIA Study?

Your assistance would be appreciated.

Regards,  
Marissa Botha  
for Naledzi Group Pty Ltd  
(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)  
145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699  
Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700  
Tel: 015 296 3988  
Fax: 015 296 4021  
Cell: 084 226 5584

---

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individual concerned. SANParks will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages or other liability arising. Thank you.  
South African National Parks 643 Leyds Street, Muckleneuk, Pretoria, South Africa

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South African National Parks 643 Leyds Street, Muckleneuk, Pretoria, South Africa

---

**Re: FW: FW: Naledzi: EIA Study for Prospecting Right Application  
(Gumbu/Madimbo area)**

Cath Vise [cath@vhembecosphere.org]

**Sent:** 15 January 2018 10:28 AM

**To:** Marissa Botha

| Dear Marissa,

I received notice of your EIA from SANParks, and would like to register the Vhembe Biosphere Reserve as an I&AP.

Please add my email address to your contacts? I am coordinator for VBR, and can thus facilitate our participation in your EIA process.

Kind regards,  
Cath

--

Cath Vise  
Coordinator  
Vhembe Biosphere Reserve

+27 (0)71 498 7551

[cath@vhembecosphere.org](mailto:cath@vhembecosphere.org)

[www.vhembecosphere.org](http://www.vhembecosphere.org)

---

**From:** Marissa Botha [<mailto:botham@naledzi.co.za>]

**Sent:** 04 January 2018 01:18 PM

**To:** Garth Holt

**Subject:** RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Garth,

Herewith is a Stakeholders Notification letter and Background Information Document in respect of the EIA Study for the SAMIN Prospecting Right Application. It will provide more detail on the project to decide who would be the responsible person.

Regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

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**From:** Marissa Botha

**Sent:** 04 January 2018 12:37 PM

**To:** [garth.holt@sanparks.org](mailto:garth.holt@sanparks.org)

**Subject:** Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

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Although its only a PR application and not a mining application, we would like to inform the KNP of the application which has been lodged by SAMIN to the Department of Mineral Resources: Limpopo Office.

Can you assist by providing the correct contact person which we are to consult with in this regard as part of our Public Participation Process for the EIA Study?

Your assistance would be appreciated.

Regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

---

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[marisa.coetzee@sanparks.org](mailto:marisa.coetzee@sanparks.org) to [cath@vhembecosystem.org](mailto:cath@vhembecosystem.org) on 2018-01-15 08:40:03 are confidential and may contain privileged or copyright information. You may not present this message to another party without consent from the sender. If you are not [cath@vhembecosystem.org](mailto:cath@vhembecosystem.org) please notify [marisa.coetzee@sanparks.org](mailto:marisa.coetzee@sanparks.org) and delete this email and you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. 2) Liability: This email is not a binding agreement and does not conclude an agreement without the express confirmation by the sender's superior or relevant authorisation of SANParks. 3) Viruses: SANParks does not certify that this email is free of viruses or defects. 4) Requested: SANParks does not consent to its employees sending un-asked for emails which contravene the law. In the event that you feel this email is such, please notify SANParks in order for the appropriate corrective action to be taken. 5) Advice: Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of SANParks. Any actions taken on the basis of this email are at the reader's own risk. 6) Other: The sender of this email is expressly required not make any defamatory statements. Any such communication is contrary to SANParks policy and outside the scope of the employment of the individual concerned. SANParks will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages or other liability arising. Thank you. South African National Parks 643 Leyds Street, Muckleneuk, Pretoria, South Africa

---

**RE: Draft scoping report for DMR REF: LP30/5/1/1/2/13050 EM**

Marissa Botha

**Sent:** 17 January 2018 03:42 PM

**To:** James Chapangara Mugabe Pr.Sci.Nat. [jcmugabe@gmail.com]

**Attachments:** Scoping Report - SAMIN PR ~1.pdf (2 MB) ; EAP CV Khangwelo\_Desmond\_M~1.pdf (97 KB) ; Appendix 3A - I&AP List.pdf (287 KB) ; Appendix 3B - FGM with Gum~1.pdf (458 KB) ; Appendix 2 - Site Plan.jpg (557 KB) ; Comment Sheet - DSR for S~1.docx (33 KB)

Good day James,

Herewith please find attached the draft Scoping Report and associated appendices for the SAMIN Group Propsecting Right Application. We also include the Comment Sheet should you wish to provide comments on the report.

Kind regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

---

**From:** James Chapangara Mugabe Pr.Sci.Nat. [jcmugabe@gmail.com]

**Sent:** 17 January 2018 12:56 PM

**To:** Marissa Botha

**Subject:** Draft scoping report for DMR REF: LP30/5/1/1/2/13050 EM

Good day

May you kindly forward the Draft Scoping Report for the above as advertised recently in the press. I could not obtain anything on your website or the link provided in the press.

Kind regards

James

--

James Chapangara Mugabe, Pr. Sci. Nat.



**Re: Draft scoping report for DMR REF: LP30/5/1/1/2/13050 EM**

James Chapangara Mugabe Pr.Sci.Nat. [jcmugabe@gmail.com]

**Sent:** 17 January 2018 04:54 PM

**To:** Marissa Botha

Dear Marissa

Thank you very much for the response and the attached documents. I'll definitely complete the comment sheet should I have any comments after perusing the documents.

Many thanks and kind regards

James

On Wednesday, 17 January 2018, Marissa Botha <[botham@naledzi.co.za](mailto:botham@naledzi.co.za)> wrote:

Good day James,

Herewith please find attached the draft Scoping Report and associated appendices for the SAMIN Group Propsecting Right Application. We also include the Comment Sheet should you wish to provide comments on the report.

Kind regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

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**Sent:** 17 January 2018 12:56 PM

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Kind regards

James

--

James Chapangara Mugabe, Pr. Sci. Nat.

--

James Chapangara Mugabe, Pr. Sci. Nat.



## COMMENT SHEET FOR DRAFT SCOPING REPORT

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS IN SUPPORT OF A PROSPECTING RIGHT APPLICATION BY SAMIN GROUP PTY LTD IN THE DISTRICT OF MUSINA OF LIMPOPO PROVINCE & AVAILABILITY OF DRAFT SCOPING REPORT FOR PUBLIC REVIEW

DMR REF: LP 30/5/1/1/2/13050EM

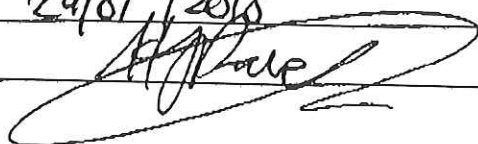
Naledzi Environmental Consultants CC  
 Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700  
 141 Thabo Mbeki Street, Fauna Park, Polokwane  
 Tel: 015 296 3988 Fax: 015 296 4021  
 Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond)  
 Email: [botham@naledzi.co.za](mailto:botham@naledzi.co.za) or [dmusetsho@naledzi.co.za](mailto:dmusetsho@naledzi.co.za)

TITLE (Prof/Mr/Mrs)	LT COL	FIRST NAME	Hennie	
SURNAME	Davel			
CAPACITY (eg. Director/Secretary)	Environmental Officer			
ORGANISATION	SANDF			
POSTAL ADDRESS	P/Bag X 9304 PLK 0700	POSTAL CODE	0700	
TEL NO:	(015) 299 3087	CELL NO:	082 809 4810	
FAX NO:	(015) 299 3088	EMAIL ADDRESS:	rwjlimpopo@gmail.com	

COMMENTS/ISSUES / CONCERNS raised on the Draft Scoping Report  
 (Please use separate sheet, if required)

The Madimbo Corridor where the planned mining / prospecting activity/activities are planned is still managed by the South African National Defence Force (SANDF).  
 Therefore the SANDF is a direct affected party in this!

It must be noted that the mentioned area is required for Military training and is therefore not considered safe for civilian activities.

NAME & SURNAME: Hennie Davel  
DATE: 29/01/2018  
SIGNATURE: 

## **Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Bufferzone [bufferzone@kruger2canyons.org]

**Sent:** 05 February 2018 05:00 PM

**To:** Marissa Botha

Good day

Please register myself; Marisa Coetzee ([Marisa.Coetzee@sanparks.org](mailto:Marisa.Coetzee@sanparks.org)) and Sandra Visagie ([Sandra.Visagie@sanparks.org](mailto:Sandra.Visagie@sanparks.org)) as I&APs and keep us abreast of developments in this project.

Thanks and kind regards

**Wehncke van der Merwe**

**Bufferzone Coordinator**

LOWVELD PROTECTED AREA FORUM

GLOBAL ENVIRONMENTAL FACILITY PROTECTED AREA PROGRAMME

K2C office, Zandspruit Bush & Aero Estate, Hoedspruit

Cell: 084 796 0834

**RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Marissa Botha

**Sent:** 06 February 2018 08:23 AM  
**To:** Bufferzone [bufferzone@kruger2canyons.org]  
**Cc:** marisa.coetzee@sanparks.org; sandra.visagie@sanparks.org  
**Attachments:** Background Information Doc~1.pdf (1 MB) ; Stakeholder Notification l~1.pdf (437 KB) ; Comment & Registration Fo~1.docx (36 KB) ; Aerial Local Map PR SAMIN.jpg (363 KB)

Good day Wehncke,

We herewith confirm receipt of your registration including Marisa Coetzee and Sandra Visagie. Herewith please find attached a Background Information Document and Notification Letter for the project. A draft Scoping Report is also available for public review and comment. The documentation is subject comment from 12 January until 12 February 2018.

A public meeting has also been scheduled for 7 February 2018 at Gumbu Primary School at Gumbu Village from 2pm - 4pm.

Thank you for your participation.

Kind regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC &amp; Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

---

**From:** Bufferzone [bufferzone@kruger2canyons.org]**Sent:** 05 February 2018 05:00 PM**To:** Marissa Botha**Subject:** Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day

Please register myself; Marisa Coetzee ([Marisa.Coetzee@sanparks.org](mailto:Marisa.Coetzee@sanparks.org)) and Sandra Visagie ([Sandra.Visagie@sanparks.org](mailto:Sandra.Visagie@sanparks.org)) as I&APs and keep us abreast of developments in this project.

Thanks and kind regards

**Wehncke van der Merwe****Bufferzone Coordinator**

LOWVELD PROTECTED AREA FORUM

GLOBAL ENVIRONMENTAL FACILITY PROTECTED AREA PROGRAMME

K2C office, Zandspruit Bush &amp; Aero Estate, Hoedspruit

Cell: 084 796 0834

**RE: Public Meeting for SAMIN Prospecting Right Application & EIA Process**

Marissa Botha

**Sent:** 06 February 2018 02:14 PM**To:** Motlatjo Maselesele [Motlatjom@golimpopo.com]

The meeting is informative and allows Interested and Affected Parties the opportunity to ask questions and obtain clarity on the project.

The meeting is not compulsory. We have included the Limpopo Tourism Agency on our database because this prospecting application has been lodged on land adjacent to the R525 Punda Maria road which leads to the Kruger National Park which is a highly frequented tourist destination.

Regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC &amp; Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

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Fax: 015 296 4021

Cell: 084 226 5584

---

**From:** Motlatjo Maselesele [Motlatjom@golimpopo.com]**Sent:** 06 February 2018 02:13 PM**To:** Marissa Botha**Subject:** RE: Public Meeting for SAMIN Prospecting Right Application & EIA Process

Good Day

Just to double check with you as to whether it's necessary for Limpopo Tourism Agency to attend. Am asking this because the meeting is more on Environment and our main focus is tourism.

Regards,

Motlatjo Maselesele-: Executive Secretary

**LIMPOPO TOURISM AGENCY**

Southern Gateway Ext. 4, N1 Main Road, Polokwane 0700

T: +27 (0) 15 293 3621

C: +27 (0) 79 884 3399

f2m +27 (0) 86 576 4993

e: [motlatjom@golimpopo.com](mailto:motlatjom@golimpopo.com)w: <http://www.golimpopo.com>

---

**From:** Marissa Botha [mailto:botham@naledzi.co.za]**Sent:** Tuesday, 06 February 2018 12:59 PM**To:** Motlatjo Maselesele**Subject:** FW: Public Meeting for SAMIN Prospecting Right Application & EIA Process

Good day Motlatjo,



As requested herewith please find attached the Background Information Document and Notification letter distributed on 12 January 2018 for the project.

Also find attached the Agenda for the public meeting on 7 February 2018 at Gumbu Primary School from 2pm - 4pm as requested.

A copy of the draft Scoping Report that has been prepared for the project will be sent in the next email. It is available for public review and comment until 12 February 2018.

Kind regards,

Marissa Botha  
for Naledzi Group Pty Ltd  
(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)  
145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699  
Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700  
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---

**From:** Motlatjo Maselesele [Motlatjom@golimpopo.com]  
**Sent:** 06 February 2018 12:47 PM  
**To:** Marissa Botha  
**Subject:** Re: Public Meeting for SAMIN Prospecting Right Application & EIA Process

Good Day

As per our telecommunique ealier on, kindly furnish this office with documentation for the above meeting and the agenda as well for the CEO.

Regards,

Motlatjo Maselesele-: Executive Secretary



**LIMPOPO TOURISM AGENCY**

Southern Gateway Ext. 4, N1 Main Road, Polokwane 0700

T: +27 (0) 15 293 3621

C: +27 (0) 79 884 3399

f2m +27 (0) 86 576 4993

e: [motlatjom@golimpopo.com](mailto:motlatjom@golimpopo.com)

w: <http://www.golimpopo.com>

**RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Marissa Botha

**Sent:** 06 February 2018 08:28 AM**To:** Bufferzone [bufferzone@kruger2canyons.org]**Cc:** marisa.coetzee@sanparks.org; sandra.visagie@sanparks.org**Attachments:** Scoping Report - SAMIN PR ~1.pdf (2 MB) ; Appendix 3A - I&AP List.pdf (287 KB) ; Project Briefing Gumbu Vil~1.pdf (869 KB) ; SAMIN Attendance Register ~1.pdf (458 KB) ; Comment Sheet - DSR for S~1.docx (33 KB)

Good day,

Herewith also find attached the draft Scoping Report, List of Interested and Affected Parties including the minutes of a Focus Group meeting held with the Gumbu Village community.

Please note there is a public review and comment period on the draft Scoping Report from 12 January until 12 February 2018.

Regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC &amp; Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

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Kind regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC &amp; Naledzi Waterworks)

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Cell: 084 226 5584

---

**From:** Bufferzone [bufferzone@kruger2canyons.org]



**Sent:** 05 February 2018 05:00 PM

**To:** Marissa Botha

**Subject:** Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day

Please register myself; Marisa Coetzee ([Marisa.Coetzee@sanparks.org](mailto:Marisa.Coetzee@sanparks.org)) and Sandra Visagie ([Sandra.Visagie@sanparks.org](mailto:Sandra.Visagie@sanparks.org)) as I&APs and keep us abreast of developments in this project.

Thanks and kind regards

**Wehncke van der Merwe**

**Bufferzone Coordinator**

LOWVELD PROTECTED AREA FORUM

GLOBAL ENVIRONMENTAL FACILITY PROTECTED AREA PROGRAMME

K2C office, Zandspruit Bush & Aero Estate, Hoedspruit

Cell: 084 796 0834

**RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Bufferzone [bufferzone@kruger2canyons.org]

**Sent:** 06 February 2018 08:31 AM**To:** Marissa Botha**Cc:** marisa.coetzee@sanparks.org; sandra.visagie@sanparks.org

Thanks for registering us Marissa

Noted, we will provide comments before the 12<sup>th</sup>. Sandra will also attend today.

Kind regards

**Wehncke van der Merwe****Bufferzone Coordinator**

LOWVELD PROTECTED AREA FORUM

GLOBAL ENVIRONMENTAL FACILITY PROTECTED AREA PROGRAMME

K2C office, Zandspruit Bush &amp; Aero Estate, Hoedspruit

Cell: 084 796 0834

---

**From:** Marissa Botha [mailto:botham@naledzi.co.za]**Sent:** 06 February 2018 08:24 AM**To:** Bufferzone <bufferzone@kruger2canyons.org>**Cc:** marisa.coetzee@sanparks.org; sandra.visagie@sanparks.org**Subject:** RE: Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day Wehncke,

We herewith confirm receipt of your registration including Marisa Coetzee and Sandra Visagie. Herewith please find attached a Background Information Document and Notification Letter for the project. A draft Scoping Report is also available for public review and comment. The documentation is subject comment from 12 January until 12 February 2018.

A public meeting has also been scheduled for 7 February 2018 at Gumbu Primary School at Gumbu Village from 2pm - 4pm.

Thank you for your participation.

Kind regards,

Marissa Botha

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

---

**From:** Bufferzone [bufferzone@kruger2canyons.org]**Sent:** 05 February 2018 05:00 PM**To:** Marissa Botha**Subject:** Naledzi: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day

Please register myself; Marisa Coetsee ([Marisa.Coetsee@sanparks.org](mailto:Marisa.Coetsee@sanparks.org)) and Sandra Visagie ([Sandra.Visagie@sanparks.org](mailto:Sandra.Visagie@sanparks.org)) as I&APs and keep us abreast of developments in this project.  
Thanks and kind regards

**Wehncke van der Merwe**

**Bufferzone Coordinator**

LOWVELD PROTECTED AREA FORUM

GLOBAL ENVIRONMENTAL FACILITY PROTECTED AREA PROGRAMME

K2C office, Zandspruit Bush & Aero Estate, Hoedspruit

Cell: 084 796 0834

## **Naledzi Scoping phase - SAMIN Group Prospecting in Musina LM, Limpopo**

Cath Vise [cath@vhembecosphere.org]

**Sent:** 12 February 2018 12:55 PM

**To:** Marissa Botha; Desmond Musetsho

Dear Marissa and Desmond,

Firstly thank you for now registering Vhembe Biosphere Reserve as an I&AP. I refer to your EIA process for the application of Prospecting Rights by SAMIN Group PTY LTD in District of Musina, Limpopo. I have collated comments from some of our members of the Vhembe Biosphere Reserve regarding this application.

Firstly to note that the comments refer to the background information document that was circulated.

The draft Scoping Report was not originally circulated, nor is it available on the Naledzi Environmental Consultants website as indicated at the public meeting.

We did manage to source the scoping report elsewhere. Please can I ask that going forward all reports are circulated via email to I&AP as not all I&AP are able to get to the relevant public libraries to view the report. Also that you make them available on your website as you indicated.

The Vhembe Biosphere Reserve aims to bring people and nature together – conserving biodiversity but at the same time recognizing the need for sustainable socio-economic development. We do have some concerns with this particular SAMIN prospecting project – specifically with regards to its location within Critical Biodiversity Areas (irreplaceable) as well as being located just upstream of a World RAMSAR site – the Makuleke Wetlands, which has not been mentioned in your document. As such, we have concerns that SAMIN's prospecting activities could have detrimental impacts on biodiversity and the aquatic environment upstream of this important area. Please see below a list of comments from our stakeholder group:

### **Maps:**

- The locality map only shows the coordinates of the boundaries of the area under investigation. The map is stated to be compiled at a scale 1 to 50000, this is not true. The map was compiled using the topographic 1 to 50000 scale maps but was not projected to the 1:50000 scale.
- Figure 1 was compiled using Google Earth at such a low resolution and high scale that is almost impossible to determine exactly where their trench lines start and end, and in what sensitive environments these trenches take place in.
- The maps also do not show trenches in regard to any sensitive areas, with particular reference to Limpopo Conservation Plan and Vhembe Bioregional Plan
- Figure 1 clearly shows seven demarked areas earmarked for core drilling exploration. Nonetheless under heading 4 you mentioned that the seven sites earmarked for core drilling will only be determined once the trenching phase has been completed. As a result, an additional environmental impact assessment phase should be included into the proposal which will commence after the trenching phase has taken place and the seven borehole sites have been identified.

### **Aquatic Environment:**

From the background information under Heading 7 you make no mention of studying the impact of the proposed prospecting on the aquatic environment. First and foremost, all the proposed trench lines run north-south starting at the Limpopo River. The main question of concern is at what distance from the Limpopo River Riparian Zone do they intend to start their invasive trenching?

How do they intend avoiding numerous ephemeral streamlets which cross their trench lines?

The above-mentioned concerns are of critical importance as they could have a detrimental effect on the Makuleke Wetlands declared a Ramsar Site downstream from the proposed prospecting area.

### **Rehabilitation concerns:**

Concerns were raised regarding mining and or prospecting activity where rehabilitation took place reverting the site back to pre-prospecting state (it is impossible). As this prospecting application also targets diamonds, the above, is of extreme concern as alluvial diamonds are known to occur in the sedimentary deposits of the Limpopo River.

**Consulting required Plans:**

The Background Information Document does not take into account required sensitive areas – in particular reference to Limpopo Conservation Plan and the Vhembe District Bioregional Plan which has recently been released. Also the Scoping Report does not make reference to the UNESCO Vhembe Biosphere Reserve or Vhembe Bioregional Plan. Of critical importance is the Critical Biodiversity Areas that this project falls within.

The exact location of trenches and boreholes with respect to these plans has not been indicated, and this should be done to facilitate further informed response.

This is an incredibly sensitive area and they must be made to take account of all regulations, plans and knowledge, especially considering the riparian forest and pans.

**Social Impacts:**

We did not see reference to the potential negative social impacts associated with development. This would include migration of people into the area, especially contract workers from elsewhere or people coming to the area in search of work. Possible social impacts include an increase in crime, with particular reference to violent crimes against women.

In addition, there is also potential impact on roads due to increased traffic to the area – with risk of both wildlife and livestock (free roaming in this environment) being hit by vehicles with associated impact on livelihoods.

Also refer to air quality impacts, and associated potential health implications from increased dust etc in the air.

I hope these comments will assist you with your Scoping Report going forward, to ensure that all concerns are taken into account when decision making takes place regarding this application.

Kind regards,

Cath

(on behalf of Stakeholders of Vhembe Biosphere Reserve)

--

Cath Vise  
Coordinator  
Vhembe Biosphere Reserve

+27 (0)71 498 7551  
[cath@vhembecosphere.org](mailto:cath@vhembecosphere.org)  
[www.vhembecosphere.org](http://www.vhembecosphere.org)

**RE: Site visit for comments**

Marissa Botha

**Sent:** 14 February 2018 12:04 PM**To:** TakaM@dws.gov.za**Cc:** NethonondaV@dws.gov.za

Good day,

We have received your request for a site visit on 26 February 2018 and will revert back to you shortly.

Kind regards,

Marissa Botha (Pr.Sci.Nat)

Environmental Assessment Practitioner

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC &amp; Naledzi Waterworks)

145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

----- Original message -----

From: "Taka Mihloti (PKE)" &lt;TakaM@dws.gov.za&gt;

Date: 2018/02/14 10:04 (GMT+02:00)

To: Desmond Musetsho &lt;dmusetsho@naledzi.co.za&gt;

Cc: "Nethononda Vhonani Gloria (TZN)" &lt;NethonondaV@dws.gov.za&gt;

Subject: Site visit for comments

Good morning,

After going through the Background Information document for the prospecting right application by SAMIN Group around Gumbu, we saw the need to do a site inspection before commenting. We are available from 26 February. Kindly inform us on the date suitable for you in time so that we can make travel arrangements.

Regards,

Taka M.P. (Pr.Sci.Nat)

Scientist: Water Use Authorization

Limpopo - North West Proto CMA

E-mail: [takam@dws.gov.za](mailto:takam@dws.gov.za)

Contacts: (015) 306 7342; 071 876 8504

Tzaneen Dam, Voortrekker Str, Tzaneen, 0850

**DISCLAIMER:** This message and any attachments are confidential and intended solely for the addressee. If you have received this message in error, please notify the system manager/sender. Any unauthorized use, alteration or dissemination is prohibited. The Department of Water and Sanitation further accepts no liability whatsoever for any loss, whether it be direct, indirect or consequential, arising from this e-mail, nor for any consequence of its use or storage.

**Re: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Piet Theron [piettheron01@gmail.com]

**Sent:** 15 February 2018 04:49 PM

**To:** Marissa Botha

Ok, that makes sense - thank you.

**Piet Theron** | International Coordinator |  
**Great Limpopo Transfrontier Conservation Area**  
Cell + [27 82 468 6488](tel:27824686488)

Supported by Peace Parks Foundation [www.peaceparks.org](http://www.peaceparks.org)

**Please consider the environment before you print this!**

On Thu, Feb 15, 2018 at 4:46 PM, Marissa Botha <[botham@naledzi.co.za](mailto:botham@naledzi.co.za)> wrote:

No, SAMIN has not started with any exploration drilling. The contracted Geologist has only gone to site to determine the target areas for prospecting, based on their surface geological mapping and literature review of the area. This was conducted in January 2018.

Regards,

Marissa Botha (Pr.Sci.Nat)

Environmental Assessment Practitioner

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

[145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699](http://145ThaboMbekiStreet,FaunaPark,Polokwane,0699)

Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700

Tel: 015 296 3988

Fax: 015 296 4021

Cell: 084 226 5584

---

**From:** Piet Theron [[piettheron01@gmail.com](mailto:piettheron01@gmail.com)]

**Sent:** 15 February 2018 03:24 PM

**To:** Marissa Botha

**Subject:** Re: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Hi Marissa

Thanks for this. One of the local community members told me that SAMIN has already started with the exploration drilling the area - is that true?

Regards

Piet

**Piet Theron** | International Coordinator |  
**Great Limpopo Transfrontier Conservation Area**  
Cell + [27 82 468 6488](tel:27824686488)

Supported by Peace Parks Foundation [www.peaceparks.org](http://www.peaceparks.org)

**Please consider the environment before you print this!**

On Thu, Feb 15, 2018 at 3:11 PM, Marissa Botha <[botham@naledzi.co.za](mailto:botham@naledzi.co.za)> wrote:

Piet,

You are welcome to follow the link below to obtain the public documents available for the project.

<http://www.naledzi.co.za/public-documents-naledzi.php>

Kind regards,

Marissa Botha (Pr.Sci.Nat)

Environmental Assessment Practitioner

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

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---

**From:** Marissa Botha

**Sent:** 15 February 2018 02:54 PM

**To:** Piet Theron

**Subject:** RE: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Good day Pieter,

Yes, that is correct we are busy with a Scoping and EIA Process on behalf of Samin Group Pty Ltd for a Prospecting Right application with bulk sampling. We will register the GLTFCA as an I&APs and send any further correspondence through.

We are currently in the Scoping Phase of the EIA Process in which we scope the issues on which the EIA Study should be focused. A public registration and comment period on the Background Information Document and draft Scoping Report was provided from 12 January 2018 until 12 February 2018. A public meeting took place at Gumbu Primary School on 7 February 2018 to facilitate further comments.

**Way Forward:**

We are currently updating the Scoping Report for submission to the DMR in order to continue to the EIA Phase of the process. A second round of public consultation will follow in which the EIA Report & EMPR will be made available for public review.

Regards,

Marissa Botha (Pr.Sci.Nat)

Environmental Assessment Practitioner

for Naledzi Group Pty Ltd

(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)



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Posnet Library Gardens, Suite 320, Private Bag X 9307, Polokwane, 0700  
Tel: 015 296 3988  
Fax: 015 296 4021  
Cell: 084 226 5584

---

**From:** Piet Theron [[piettheron01@gmail.com](mailto:piettheron01@gmail.com)]  
**Sent:** 15 February 2018 12:43 PM  
**To:** Marissa Botha  
**Subject:** EIA Study for Prospecting Right Application (Gumbu/Madimbo area)

Hi Marissa

Hope you're well. I have been made aware that there is currently an EIA process underway for a prospecting licence in the Gumbu owned Madimbo area. Could you please register the Great Limpopo Transfrontier Conservation Area (GLTFCA) as an interested and affected party? Also, where are you currently with the EIA process?

Regards

Piet

**Piet Theron** | International Coordinator |  
**Great Limpopo Transfrontier Conservation Area**  
Cell [+27 82 468 6488](tel:+27824686488)

Supported by Peace Parks Foundation [www.peaceparks.org](http://www.peaceparks.org)

**Please consider the environment before you print this!**

## **EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

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Piet

**Piet Theron** | International Coordinator |  
**Great Limpopo Transfrontier Conservation Area**  
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**Please consider the environment before you print this!**

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Environmental Assessment Practitioner

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Piet

**Piet Theron** | International Coordinator |

**Great Limpopo Transfrontier Conservation Area**

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**Please consider the environment before you print this!**

## **RE: EIA Study for Prospecting Right Application (Gumbu/Madimbo area)**

Marissa Botha

**Sent:** 15 February 2018 03:11 PM

**To:** piettheron01@gmail.com

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Kind regards,

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Environmental Assessment Practitioner

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(subsidiary companies include Naledzi Environmental Consultants CC & Naledzi Waterworks)

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**Piet Theron** | International Coordinator |  
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## COMMENT AND REGISTRATION FORM

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS IN SUPPORT OF A GRAPHITE PROSPECTING RIGHT APPLICATION BY SAMIN GROUP PTY LTD IN THE DISTRICT OF MUSINA OF LIMPOPO PROVINCE & AVAILABILITY OF A DRAFT SCOPING REPORT FOR PUBLIC REVIEW**

**DMR REF: LP 30/5/1/1/2/13050EM**

**Naledzi Environmental Consultants CC**  
 Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700  
 141 Thabo Mbeki Street, Fauna Park, Polokwane  
**Tel: 015 296 3988** Fax: 015 296 4021  
**Cell: 066 215 7228 (Marissa) or 083 410 1477 (Desmond)**  
 Email: [botham@naledzi.co.za](mailto:botham@naledzi.co.za) or [dmusetsho@naledzi.co.za](mailto:dmusetsho@naledzi.co.za)

<b>TITLE (Prof/Mr/Mrs)</b>	Ms	<b>FIRST NAME</b>	Tracy-Lee Ann
<b>SURNAME</b>	Petersen		
<b>CAPACITY (eg. Director/Secretary)</b>	Environmental Manager		
<b>ORGANISATION</b>	South African National Parks – Kruger National Park		
<b>POSTAL ADDRESS</b>	PO Box 394 Skukuza	<b>POSTAL CODE</b>	1350
<b>TEL NO:</b>	013 735 4271	<b>CELL NO:</b>	071 432 7040
<b>FAX NO:</b>		<b>EMAIL ADDRESS:</b>	tracy.petersen@sanparks.org
<b>COMMENTS/ISSUES / CONCERNS (Please use separate sheet, if required)</b>			

Please add the following of my colleagues/friends/neighbours on your mailing list:

<b>Name:</b>	<b>Organisation:</b>	
<b>Contact details</b>		
<b>Address:</b>		
<b>Tel:</b>	<b>Fax:</b>	<b>Cell:</b>
<b>Email:</b>		

**Fwd: I am sharing 'provincial-gazette-ZA-transvaal-vol-235-no-4799-dated-1992-01-01.pdf' with you**

RWU Limpopo [rwulimpopo@gmail.com]

**Sent:** 12 March 2018 02:11 PM

**To:** Marissa Botha

**Attachments:** provincial-gazette-ZA-tran~1.pdf (4 MB)

----- Forwarded message -----

From: **HM Davel** <[hjmdavel@gmail.com](mailto:hjmdavel@gmail.com)>

Date: Sun, Mar 11, 2018 at 12:11 PM

Subject: I am sharing 'provincial-gazette-ZA-transvaal-vol-235-no-4799-dated-1992-01-01.pdf' with you

To:

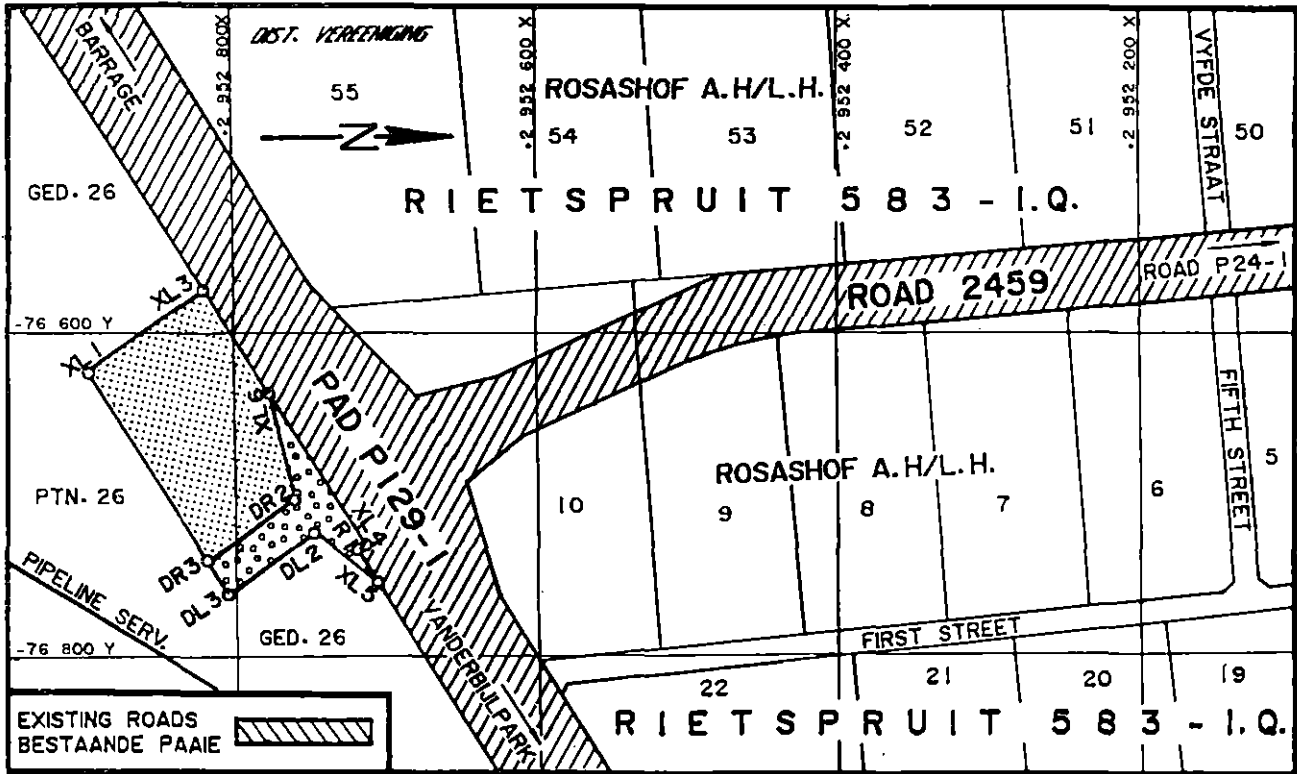
Attached, please he proclamation notice of the Madimbo Corridor (where mining application was handed-in). Your special attention is drawn to pages 7 and 8 of the attached document.

Regards, Lt Col Hennie Davel

Shared from Word for Android

<https://office.com/getword>





THE FIGURE : XL1, XL3, XL6, DR2, DR3, XL1 REPRESENTS A PORTION OF ROAD P129-1 AS INTENDED BY PUBLICATION OF THIS ROAD ADJUSTMENT AND DEPICTED IN DETAIL ON PLAN NO. : WRP 208/2

DIE FIGUUR : XL1, XL3, XL6, DR2, DR3, XL1 STEL VOOR 'N GEDEELTE VAN PAD P129-1 SOOS BEDOEL BY AFKONDIGING VAN HIERDIE PADREËLING EN IN DETAIL GETOON OP PLAN NR. : WRP 208/2

THE FIGURE : XL6, XL4, R1, XL5, DL2, DL3, DR3, DR2, XL6 REPRESENTS AN ACCESS ROAD AS INTENDED BY PUBLICATION OF THIS ROAD ADJUSTMENT AND DEPICTED IN DETAIL ON PLAN NO. : WRP 208/2

DIE FIGUUR : XL6, XL4, R1, XL5, DL2, DL3, DR3, DR2, XL6 STEL VOOR 'N TOEGANGSPAD SOOS BEDOEL BY AFKONDIGING VAN HIERDIE PADREËLING EN IN DETAIL GETOON OP PLAN NR. : WRP 208/2

CO-ORDINATES / KOÖRDINATE

	Y ±0,00	X +2 900 000,00	Lo. 27°	Y ±0,00	X +2 900 000,00
DR2	-76 700,67	+52 760,20	XL1	-76 622,30	+52 896,21
DR3	-76 739,51	+52 819,64	XL3	-76 570,67	+52 817,18
DL2	-76 721,60	+52 746,53	XL4	-76 729,59	+52 713,35
DL3	-76 760,44	+52 805,96	XL5	-76 752,71	+52 707,29
			XL6	-76 629,11	+52 779,01

RESOLUTION / BESLUIT **441** DATED / GEDATEER **1991-05-02**

FILE NO./LÊER NR. **DPO21-024-23/21/P129-1**  
PLAN NO. / PLAN NR. : **WRP 208/2**

Administrateurskennisgewig 3

1 Januarie 1992

ORDONNANSIE OP NATUURBEWARING, 1983 (ORDONNANSIE NO. 12 VAN 1983): WYSIGING VAN OMSKRYWING VAN GEBIED VAN PHILIP HERD NATUURRESERVAAT

Ek, D.J. Hough, Administrateur van Transvaal, kragtens artikel 14 van die Ordonnansie op Natuurbewaring, 1983 (Ordonnansie No. 12 van 1983), wysig hierby die omskrywing van die gebied van die Philip Herd Natuureservaat, soos in die Bylae by Administrateursproklamasie No. 281 van 13 September 1967 vervat, deur op bladsy 24 die uitdrukking "(2) Die plaas Scrutton 23 MT (distrik Messina)" te skrap, en met uie volgende kaart te vervang.

Administrator's Notice 3

1 January 1992

NATURE CONSERVATION ORDINANCE, 1983 (ORDINANCE NO. 12 OF 1983): AMENDMENT OF DEFINITION OF AREA OF PHILIP HERD NATURE RESERVE

I, D.J. Hough, Administrator of the Transvaal, under section 14 of the Nature Conservation Ordinance, 1983 (Ordinance 12 of 1983), hereby amend the definition of the area of the Philip Herd Nature Reserve, as contained in Administrator's Proclamation No. 281 of 13 September 1967, by the deletion on page 24 of the expression "(2) The Farm Scrutton 23 MT (District of Messina)", and the substitution of the following diagram.

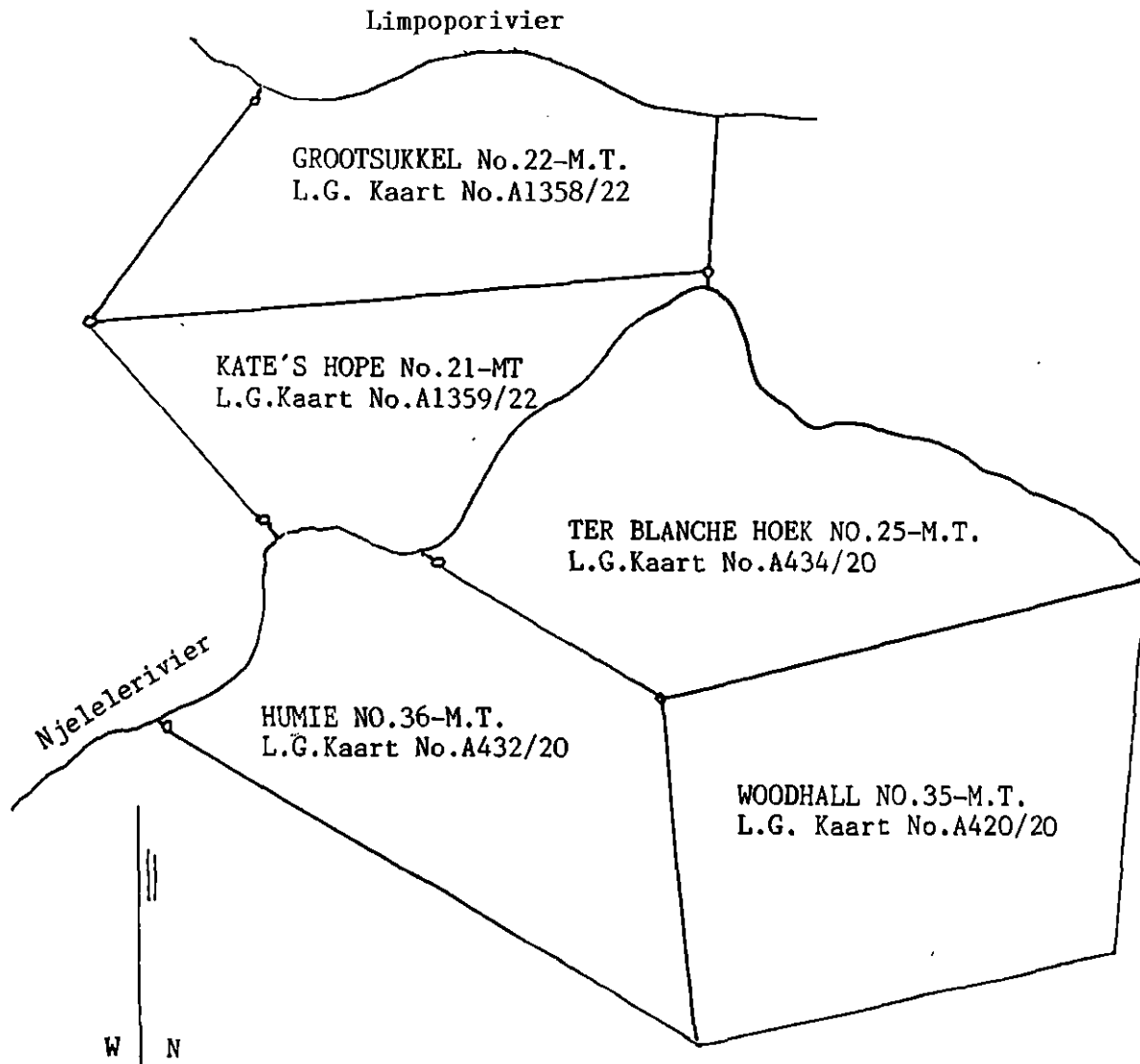
GEGEE onder my HAND te PRETORIA, op hierdie derdiende dag van Desember Eenduisend Negehoernd Een-en-Negentig.

D.J. HOUGH  
Administrateur van Transvaal

GIVEN under my HAND at PRETORIA, this thirteenth day of December One Thousand Nine Hundred and Ninety One.

D.J. HOUGH  
Administrator of the Transvaal

PHILIP HERD - PRIVAATNATUURRESERVAAT (Grootte: 8,916 ha)  
PRIVATE NATURE RESERVE (Extent: 8,916 ha)



Administrateurskennisgewing 4

1 Januarie 1992

ORDONNANSIE OP NATUURBEWARING, 1983 (ORDONNANSIE NO. 12 VAN 1983: VERKLARING TOT NATUURRESERVAAT VAN MATSHAKATINI NATUURRESERVAAT

Ek, Daniël Jacobus Hough, Administrateur van Transvaal, verklaar hierby kragtens artikel 14 van die Ordonnansie op Natuurbewaring, 1983 (Ordonnansie No. 12 van 1983), die gebied in die Bylae omskryf tot 'n natuurreservaat, om bekend te staan as Matshakatini-natuurreservaat.

BYLAE

L.G.-kaart No. A 7502/1991 uitgereik op 15 Oktober 1991

Administrator's Notice 4

1 January 1992

NATURE CONSERVATION ORDINANCE, 1983 (ORDINANCE 12 OF 1983): DECLARATION TO BE A NATURE RESERVE OF MATSHAKATINI NATURE RESERVE

I, Daniël Jacobus Hough, Administrator of the Transvaal, hereby declare under Section 14 of the Nature Conservation Ordinance, 1983 (Ordinance 12 of 1983), the area defined in the Schedule to be a nature reserve, to be known as Matshakatini Nature Reserve.

SCHEDULE

S.G. Map No. A 7502/1991 issued on 15 October 1991



Begin by die ongebakende punt, punt A op die kaart, waar die noordelike grens en die oostelike grens van Gedeelte A van die plaas Bali, 84 MT, distrik Mutale, op die suidelike of regteroewer van die Limpoporivier bymekaarkom; daarvandaan ooswaarts al met die suidelike of regteroewer van die Limpoporivier langs tot by die ongebakende punt, punt B op die kaart, waar die noordelike grens en die westelike grens van die Nasionale Krugerwildtuin op genoemde suidelike of regteroewer van die Limpoporivier bymekaarkom; daarvandaan suidweswaarts met die westelike grens van die Nasionale Krugerwildtuin langs tot by baken b, 'n een meter hoë ysterpaal en 'n klipstapel; daarvandaan suidweswaarts met die westelike grens van die Nasionale Krugerwildtuin langs tot by baken C, 'n gat in 'n rots en 'n klipstapel; daarvandaan noordweswaarts al met die noordelike grens van die selfregerende gebied Venda langs tot by baken D, 'n halwe ysterpaal en 'n klipstapel; daarvandaan suidweswaarts met die noordelike grens van Venda langs tot by baken E, 'n halwe ysterpaal en 'n klipstapel; daarvandaan reg weswaarts met die noordelike grens van Venda langs tot by baken F, 'n halwe ysterpaal en 'n klipstapel; daarvandaan noordweswaarts met die noordelike grens van Venda langs tot by baken G, 'n halwe ysterpaal en 'n klipstapel; daarvandaan suidweswaarts met die noordelike grens van Venda langs tot by baken H, 'n halwe ysterpaal en 'n klipstapel; daarvandaan suidweswaarts met die noordelike grens van Venda langs tot by baken J, 'n halwe ysterpaal en 'n klipstapel; daarvandaan noordweswaarts al met die oostelike grens van genoemde Gedeelte 4 van die plaas Bali, 84 MT, distrik Mutale, langs tot by die beginpunt.

Gegee onder my hand te Pretoria op hierdie Dertiende dag van Desember Eenduisend Negehoenderd Een-en-Negentig.

D. J. HOUGH  
Administrateur van Transvaal

Beginning at the point, point A on the map, no beacon, where the northern and the eastern borders of Portion A of the farm Bali, 84 MT, district of Mutale, meet on the southern or right bank of the Limpopo River; thence eastwards along the southern or right bank of the Limpopo River to the point, point B on the map, no beacon, where the northern and the western borders of the Kruger National Park meet on the said southern or right bank of the Limpopo River; thence south-westwards along the western border of the Kruger National Park to beacon b, a one-meter high iron standard and a rock pile; thence south-westwards along the western border of the Kruger-National Park to beacon C, a hole in a rock and a rock pile; thence north-westwards along the northern border of the self-governing territory Venda to beacon D, half an iron standard and a rock pile; thence south-westwards along the northern border of Venda to beacon G, half an iron standard and a rock pile; thence due westwards along the northern border of Venda to beacon F, half an iron standard and a rock pile; thence north-westwards along the northern border of Venda to beacon G, half an iron standard and a rock pile; thence south-westwards along the northern border of Venda to beacon G, half an iron standard and a rock pile; thence south-westwards along the northern border of Venda to beacon J, half an iron standard and a rock pile; thence north-westwards along the eastern border of said Portion 4 of the farm Bali, 84 MT, district of Mutale, to the point of beginning.

Given under my Hand at Pretoria, this Thirteenth day of December One Thousand Nine Hundred and Ninety One.

D.J. HOUGH  
Administrator of the Transvaal

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MATSHAKATINI - PRIVAATNATUURRESERVAAT (Grootte 27,600 ha)  
PRIVATE NATURE RESERVE (Extent 27,600 ha)

