



## Logistics Division

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Defence

REPUBLIC OF SOUTH AFRICA

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Department of Defence  
Logistics Division  
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28 June 2018

### **PROPOSED SANMIN GROUP PROSPECTING RIGHT APPLICATION IN THE MADIMBO CORRIDOR: OPERATIONAL INTERESTED AND AFFECTED PARTY INPUTS AND COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME**

1. The Notice on Availability of Environmental Impact Report (EIR) and Environmental Management Programme (EMPr) on the Sanmin Group prospecting right application in the Madimbo Corridor by Naledzi Environmental Consultants CC on 10 June 2018 refer.
2. At the Integrated Facilities Management Committee (IFMC) level 3 meeting of March 2018, it was agreed with Col W. van Niekerk from the SA Army, that the Regional Works Unit (RWU) Limpopo would be tasked to register as the Interested and Affected Party (I&AP) on the above Environmental Impact Assessment (EIA) process.
3. A separate meeting with Nadlezi Environmental Consultants took place between the Army Support Base (ASB) Limpopo and RWU Limpopo on March 2018, where the necessary operational and tactical inputs were discussed and submitted in respect of this application.
4. As legally required by the EIA process, a second round of inputs must be provided on the draft EIP and EMPr Reports for public review. This office has scrutinized the above reports as requested by the RWU Limpopo and the following inputs and comments are hereby provided for consideration:
  - a. Land Owner. The Madimbo Corridor is State land and is being administered by the National Department of Public Works (NDPW) as an Immovable Asset. Therefore, as the land owner the NDPW should play a lead role in this process.



- b. Land Use. The Madimbo Training Area has been reserved for use by the South African National Defence Force (SANDF) as a military training area under the auspices of the Defence Act, 2004. The property is intensively being utilised as a live fire training area by the SA Army, SA Air Force and SA Special Forces Regiment and weapons systems and equipment that pose a threat to human life remains present on the area.. The Madimbo Operational Base also is located in the Madimbo Corridor and military personnel and equipment are deployed throughout the Madimbo Corridor to execute this mandate of border safeguarding. In terms of section 48 of the Minerals and Petroleum Resources Management Act, Act No 28 of 2002, no prospecting right may be issued in respect of any land being used for public or government purposes or reserved in terms of any other law.
- c. Declared Private Nature Reserve. In 1991, the Limpopo Province declared the Madimbo Corridor as the Mashakathini Private Nature Reserve due to its it unique biodiversity which includes a variety of Red Data Listed Species under the International Union of Conservation of Nature (IUCN). In addition to this protection, the Manyedza wetland that is present on the area has also been declared as a RAMSAR site in terms of the Convention on Wetlands of International Importance Especially as Waterfowl Habitat.
- d. Environmental Rehabilitation Liability Cost. In compliance with National Treasury regulations, the SANDF is compelled to disclose the environmental rehabilitation contingent liability in its Annual Financial Statements to rehabilitate its contaminated land either with unexploded ordnances and other contaminated materials. The current cost disclosed for the Madimbo Corridor amounts to RM 51,2. Although the Gumbu area was cleared in 2012 by the Black Hawk Origin contractor, this rehabilitation only covered surface clearance and not sub-surface clearance up to 4 meters.

5. For your necessary consideration and submission to Naledzi Environmental Consultants.

  
(BRIG GEN S.J.M. MOTAU)  
GENERAL OFFICER COMMANDING DEFENCE WORKS FORMATION: MAJ GEN

DISTR

For Action

OC RWU Limpopo

For Info

Chief Joint Operations  
GOC SA Special Forces Regiment

(Attention: Col K. Kabai)

Chief SA Army

(Attention: Col W. van Niekerk)

Internal

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# Musina

## Local

Private Bag X611  
MUSINA, 0900

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## Municipality

E-mail: [msnarecords@limpopo.co.za](mailto:msnarecords@limpopo.co.za)

ENQUIRIES SPEAK TO



**R KUTAMA**

REFERENCE NO



**129/5**

10 July 2018

Naledzi Environmental Consultants CC  
Private Bag X9307  
Polokwane  
0700  
Attn: Ms M Botha  
Tel: 015 296 3988 or 084 226 5584  
Email: [botham@naledzi.co.za](mailto:botham@naledzi.co.za)

### **COMMENTS FOR SAMIN GROUP PTY LTD EIR AND EMPR FOR PROSPECTING WITH BULK SAMPLING AT GUMBU, DISTRICT OF MUSINA.**

A draft Environmental Impact Report (EIR) and Environmental Management Programme (EMPr) from Naledzi Environmental Consultants dated 28 May 2018 was received by Musina Local Municipality. The EIR is for prospecting rights, for various minerals of brytes, chrome ore, coal, cobalt, copper ore, diamond, gold ore, graphite, iron ore and nickel ore in the area of Gumbu within the jurisdiction of Musina Local Municipality. Samin Group has acquired prospecting rights for the various minerals as stated above.

Based on the draft reports and the documents presented by Naledzi, it has been confirmed that Samin has been granted approval for prospecting rights by the Department of Mineral Resources (DMR).

A site visit was conducted by officials of Waste Management, Parks and Recreation of Musina Local Municipality on the 29<sup>th</sup> of June 2018 and the following was observed:

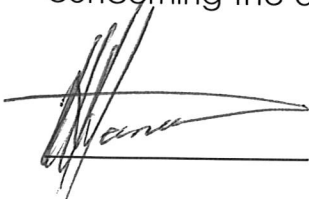
- The area is rich in vegetation which comprises of indigenous species of fauna and flora.
- Species such as Baobab and Marula trees were observed on site.
- Most of the prospecting bacons are aligned along the Limpopo River.

The following comments are based on the report:

- The DMR has given recommendation that needs to be adhered to such as making sure that relevant stakeholders such as DPW, DWA, DEA and etc should be informed of the project.

- Different impact assessment reports have been conducted such as heritage, environmental and water assessment with outlined recommendations.
- Listed and protected species have been identified with recommendation on what should be done should it arise that removal of any protected species for prospecting will be necessary. Should that be the case then the relevant Department has to be informed.
- The EMPR has been compiled and mitigation measures have been outlined however; it did not indicate how general waste produced on site is going to be disposed or managed during prospecting.
- The applicant is obliged to comply with the recommendations outlined on the EIR and EMPR (e.g. regarding buffer zones, sensitive areas and no-go areas) without compromise during the prospecting time.
- The applicant is advised to be in contact with the Municipality on how it is going to handle their general waste during prospecting.

The Waste Management, Parks and Recreation section of the municipality does not object to the application however, mitigation measures must be outlined concerning the affected sensitive areas on the EIA.

A handwritten signature in black ink, appearing to read 'R. Morolana', is written over a horizontal line. The signature is stylized and somewhat cursive.

R MOROLANA  
**GENERAL MANAGER: COMMUNITY SERVICES**



**OFFICE OF THE REGIONAL LAND CLAIMS COMMISSIONER: LIMPOPO**  
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Private Bag X9552, Polokwane, 0700  
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Enquiries: CP Senosha  
Your ref:

NALEDZI ENVIRONMENTAL CONSULTANTS CC  
145 THABO MBEKI STREET  
FAUNA PARK  
POLOKWANE  
0070

ATTENTION: MARISSA BOTHA

**COMMENTS RE: SAMIN GROUP (PTY) LTD PROSPECTING RIGHT APPLICATION WITH BULK SAMPLING AT GUMBU, DISTRICT OF MUSINA, VENDA, LIMPOPO PROVINCE**

We refer to your letter dated 08 June 2018 and to the email conversation between your Marissa Botha and our Mr Mamabolo dated 06 April 2018.

As indicated, the subject land was awarded to Gumbu/Mutele community in terms of the Restitution of Land Rights Act 22 of 1994. In terms of the agreement with the community, the property will be restored in title to them. The property is currently used by the Department of Defence for their military operations.

Negotiations are still on going with all stake holders regarding the continued leasing and use of the property by the military after transfer of the property to the community.

We trust that you will find the above in order.



CP SENOSHA

FOR: OFFICE OF THE REGIONAL LAND CLAIMS COMMISSION: LIMPOPO

DATE: 29/06/2018