



environment, forestry & fisheries

Department: Environment, Forestry
and Fisheries
REPUBLIC OF SOUTH AFRICA

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Ref: NC30/5/1/1/2/12663

Enquiries: Ms Willeen Olivier

Tel: 012 399-9581 **Fax:** 086 456 5252 **Email:** wolivier@environment.gov.za

Dr Anthony Dywili
Samara Mining (Pty) Ltd
P.O. Box 11124
KIMBERLY
8306

Fax: (086) 541 5463

Email: botham@naledzi.co.za

Attention: Dr Dywili

COMMENTS ON THE DRAFT SCOPING REPORTS (PRAA1 & PRAA2) FOR SAMARA MINING (PTY) LTD APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING WITH BULK SAMPLING ON THE LEFT BANK OF THE ORANGE RIVER, NAMAQUALAND DISTRICT, NORTHERN CAPE.

The Directorate: Transfrontier Conservation Areas appreciates the opportunity to comment on the above scoping reports. In addition to our comments at the authorities meeting of 14 December 2020, please find below the comments from a TFCA perspective.

The comments concerns the following prospecting rights applications:

Application DMRE Ref	Property	Size
PRAA1: NC30/5/1/1/2/12664 PR	On the left bank of the orange river, boundary to Portion of the remainder of the farm Richtersveld no. 11	987.98 ha
PRAA2: NC30/5/1/1/2/12663 PR	On the left bank of the orange river, boundary to Portion of the remainder of the Farm no. 18	690 ha

General Comments on the two applications:

There are two applications. We are not going to comment on PRAA2 because the whole area is a National Park, which makes this prospecting application illegal, as per the submission of the Directorate: Protected Areas Planning and Management Effectiveness. We are in full support of their submission.

COMMENTS ON THE DRAFT SCOPING REPORTS (PRAA1 & PRAA2) FOR SAMARA MINING (PTY) LTD APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING WITH BULK SAMPLING ON THE LEFT BANK OF THE ORANGE RIVER, NAMAQUALAND DISTRICT, NORTHERN CAPE.

The northern portion of the PRAA1 area as defined during the meeting of 14 December 2020 is also inside the park, and therefore also makes this application illegal. If those areas are excised, the rest of the area could be considered as a legal application for prospecting. If that happens, we would have the following inputs for the application for prospecting outside of the National Park.

The Directorate: Transfrontier Conservation Areas also support the comments by SANParks, as well as the Department of Water and Sanitation.

International Implications, particularly SADC Treaties and Agreements:

The /Ai /Ais-Richtersveld TFCA was established in 1 August 2003 when Thabo Mbeki, in his capacity as President of the Republic of South Africa, signed the Treaty together with his counterpart from Namibia. This has implications for the consultation process for any development in this area, as the treaty specifies that any development that impacts the TFCA needs to be consulted with the structures.

The following SADC treaties will have an impact on the application, all of which have been ratified by the government of the Republic of South Africa. The one that will be impacted the most, is the SADC Protocol on Shared Watercourses that came into force in 2003. As a member of SADC that have ratified the protocol, any decision by the South African government has to adhere to that.

Type of SADC Legal Instrument	Sr. No.	Legal Instrument	Date of Entry into Force	Status in South Africa
Protocol	3	SADC Protocol on Shared Watercourse Systems (Replaced by Revised Protocol – see 15 below)	28-09-1998	R
	10	SADC Protocol on the Development of Tourism	26-11-2002	R
	12	SADC Protocol on Wildlife Conservation and Law Enforcement	30-01-2003	R
	15	SADC Protocol on Shared Watercourses	22-09-2003	R
	18	SADC Protocol on Politics, Defence and Security Cooperation	02-03-2004	R
	24	SADC Protocol on Forestry		R
	27	SADC Mutual Defence Pact		R
	29	SADC Protocol on the Facilitation of Movement of Persons		S

R: Country Ratified
S: Country signed

Another issue in this application is the recognised border between South Africa and Namibia. There are different interpretations between the two countries, and any impact on the river beyond the middle of the main stream has the potential to create an international incident, which, if the Namibian government feels strongly enough about, might end up in the international court.

Consultation and Approval by stakeholders:

There was not sufficient consultation during this process to begin with. There are a number of gaps in authorities and landowner consultation.

COMMENTS ON THE DRAFT SCOPING REPORTS (PRAA1 & PRAA2) FOR SAMARA MINING (PTY) LTD APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING WITH BULK SAMPLING ON THE LEFT BANK OF THE ORANGE RIVER, NAMAQUALAND DISTRICT, NORTHERN CAPE.

Firstly, IPILRA, as interpreted by two recent Constitutional Court decisions, requires that permission/ approval for mining activities can only be granted on communal land if all adult community members provide approval for the activity. This is not something that can be negotiated, and a few community meetings will not meet the requirements set by the court. The mining company or consultants will have to find out exactly who those community members are, and then get each member's permission. From an international perspective the TFCA structures, as well as ORASECOM needs to be consulted, as well the DWS section that works on the international issues, specifically those officials responsible for bilaterals with Namibia.

We have not noticed any inclusion of two relevant DEFF sections – the section responsible for the Ramsar convention (this will definitely have an impact on the ORM Ramsar site), and the Forestry section (the head office, this is an international issue and not a provincial issue). The World Heritage section might also be an authority that needs to be consulted.

The sensitivity of the border issue, and possible implications indicates that the relevant section in DIRCO responsible for Namibian / SADC relations also be consulted.

Should you wish to correspond further on this matter kindly quote Reference: NC30/5/1/1/2/12663. Enquiries may be directed to the contact information provided at the top of this correspondence.

Yours sincerely



Mr Ishaam Abader
Acting Director-General
Department of Environment, Forestry and Fisheries
Letter signed by: Ms Aruna Seepersadh
Designation: Director: Transfrontier Conservation Areas
Date: 15 December 2020

Samara Mining - EIA

Chris Kimber <cdk@lor.co.za>

Sat 11/28/2020 2:38 PM

To: Marissa Botha <botham@naledzi.co.za>

Cc: Nathiera Kimber <nathiera@lor.co.za>; Peter Van Rooyen <petervr@lor.co.za>; Bryan Blomerus <bryan@lor.co.za>; Johan van Rooyen <johan@lor.co.za>; Jamie Ambrosini <jamie@lor.co.za>; Bafana <bafana@lor.co.za>

Hi Marissa

Further to our telephone conversation of yesterday, subsequent to your request for access, addressed to Jamie Ambrosini, and the consequent thread of mails arising therefrom. I won't deal with all the issues pertaining to the application. I will rather limit this mail to provide you, in as a condensed form possible, our stance in respect to the application itself and as a consequence your appointment.

For some background:

Lower Orange River Diamonds (Pty) Ltd (LOR) were never advised of this application prior to lodgement, but rather were made aware thereof through social media and a whispering campaign through our operations at the Lower Orange. The Applicant later advised that they had tried to make contact by way of sms ,which was confirmed by me as to having been received on 24 March 2020, just prior to lockdown. In that sms I was asked to provide my e mail address as they wished to address a mail to me, which I provided within an hour. Needless to say no mail arrived! (I have had our servers scanned, and there is simply no mail). This is the only attempt at engagement and I confirm no further engagement, initiated by the Applicant, or anybody else for that matter, has been received. The circulation of the Application, and ancillary documentation, was ultimately forwarded to me, by you, at the request of Brent Whittington, of Sanparks. This is however ultimately all trite.

For absolute clarity. The Application has been "accepted" on an area which falls within LOR Mining Right and Mining Lease area. The application therefore stands to be withdrawn, or in the alternative rejected. As a matter of interest, the Samara application is for areas located between the south bank of the Orange River and the 100 year flood-line. The 100 year flood-line, was, and continues to be, demarcated by LOR, as well as the previous rights holder. There is no official record thereof. I digress. Our right, as indicated on the Regulation 2(2) Sketch Plan clearly identifies the boundaries of the Right. It appears that the Applicant has confused the boundaries of the Mine Works Programme with the boundaries of the Right. This area, between the south bank of the Orange River and the 100 year flood- line (as determined internally from time to time) has been excluded, by agreement, between interested and affected parties, both governmental and non governmental. This leads me to the obvious question which we both failed to understand, how did the application manage to be uploaded on the SAMRAD system? As I advised, we are totally confused, however, that confusion is waning! Our preliminary investigations indicate that the Application was only uploaded subsequent to acceptance. Accordingly, it is evident that answers need to be provided. I certainly am not casting aspersions, however, our (and other interested and affected parties) interest has been piqued. We are, and will continue to be, engaging with the various interested and affected parties.

I would also like to mention , and confirm, that we discussed the issues around your documents, which contained proprietary information, of both this company and various independent Consultants, to this Company. I acknowledge your explanation, but we do need to engage further with the respective role-

players. As mentioned, there are allegations of plagiarism and misrepresentation, which need to be addressed and put to bed.

As a consequence of the above, and given that the areas that you wish to visit fall within LOR Mining Right and Lease area (the Area), and in my capacity as CEO of the Company, as well as in my Capacity in terms of section 2(a)(1) of the MHSa, you are not authorised, nor given permission, to enter the Area. Entry into the Area constitutes, amongst other offences, a criminal offence. Please be advised that, if you, or anybody else who is unauthorised to be on the property, enter the Area you will be arrested, and removed to the nearest Police station, and charged accordingly. Please be further advised that the towns of Sendelingsdrift (Reuning) and Baken are included in this jurisdiction.

As discussed on the phone I am truly sorry that you, and your colleagues find yourselves caught up in this. Should you have any queries please do not hesitate to make contact with me.

Yours sincerely

Chris Kimber
CEO



Cell | +27 83 268 2818

Email | cdk@lor.co.za

Web | www.lor.co.za

Date: 30 November 2020

Attention: Chris Kimber
Chief Executive Officer
Lower Orange River Diamonds (Pty) Ltd
Email: cdk@lor.co.za

RE: EMAILED COMMENTS RECEIVED FROM LOWER ORANGE RIVER DIAMONDS PTY LTD ON 27 NOVEMBER 2020, PERTAINING TO THE NALEDZI ENVIRONMENTAL CONSULTANTS REQUEST FOR ACCESS TO CONDUCT EIA SITE INVESTIGATIONS

Your emailed comments dated 27 November 2020 refers;

We herewith wish to respond to your comments, and these have been quoted 'verbatim' below and have been responded to accordingly.

Paragraph 1: Lower Orange River Diamonds (Pty) Ltd (LOR) were never advised of this application prior to lodgement, but rather were made aware thereof through social media and a whispering campaign through our operations at the Lower Orange. The Applicant later advised that they had tried to make contact by way of SMS , which was confirmed by me as to having been received on 24 March 2020, just prior to lockdown. In that SMS I was asked to provide my email address as they wished to address a mail to me, which I provided within an hour. Needless to say, no mail arrived! (I have had our servers scanned, and there is simply no mail). This is the only attempt at engagement, and I confirm no further engagement, initiated by the Applicant, or anybody else for that matter, has been received. The circulation of the Application, and ancillary documentation, was ultimately forwarded to me, by you, at the request of Brent Whittington, of Sanparks. This is however, ultimately all trite.

Kindly note it is unusual for any mining company to engage/notify/ advise any interested or affected party of its intention to apply for a prospecting right/permit prior to lodgement. The mining company would then put its own application in jeopardy. An applicant will only notify interested and affected parties (I&As) of the application once accepted and instructed by the DMRE to notify I&As through the EIA Process. It follows therefore that your expectation and demand that Samara should have informed you prior to such an application does not have a basis, even in law.

Naledzi Environmental Consultants (Pty) Ltd has sent out an emailed notification of the prospecting right applications and availability of the Draft Scoping Reports to LOR on 14 November 2020. The list of recipients from LOR included johan@lor.co.za, jamie@lor.co.za and marina@lor.co.za. On 17 November 2020 we received your email address from Mr Brent Whittington from Sanparks, as you stated, and forwarded the notification to you. (Please see Annexure 1 for proof of notifications of 14 and 17 November 2020).

Samara Mining (Pty) Ltd has also confirmed that they engaged LOR on 18 November 2020 in Stellenbosch to discuss the applications. (See Annexure 2 for the proof of consultations supplied by Samara Mining Pty Ltd).

Paragraph 2: The Application has been "accepted" on an area which falls within LOR Mining Right and Mining Lease area. The application therefore stands to be withdrawn, or in the alternative rejected. As a matter of interest, the Samara application is for areas located between the south bank of the Orange River and the 100-year flood-line. The 100-year flood-line, was, and continues to be, demarcated by LOR, as well as the previous rights holder. There is no official record thereof. I digress. Our right, as

indicated on the Regulation 2(2) Sketch Plan, clearly identifies the boundaries of the Right. It appears that the Applicant has confused the boundaries of the Mine Works Programme with the boundaries of the Right. This area, between the south bank of the Orange River and the 100-year flood-line (as determined internally from time to time) has been excluded, by agreement, between interested and affected parties, both governmental and non-governmental. This leads me to the obvious question which we both failed to understand, how did the application manage to be uploaded on the SAMRAD system? As I advised, we are totally confused; however, that confusion is waning! Our preliminary investigations indicate that the Application was only uploaded subsequent to acceptance. Accordingly, it is evident that answers need to be provided. I certainly am not casting aspersions; however, our (and other interested and affected parties) interest has been piqued. We are, and will continue to be, engaging with the various interested and affected parties.

The DMRE has accepted both Samaras' applications on 15 September 2020, and LORs claims can only be verified with the DMRE. We have lodged a spatial query to the DMRE Kimberley Office to verify the LOR claims with the department. The DMRE Kimberley Office will need to advise us, provide the relevant information and state the way forward. Naledzi can unfortunately not provide a response to LORs claim until advised by the DMRE.

With regard to the withdrawal of the applications; Samara has confirmed in a letter addressed to LOR dated 26 November 2020 that they will not withdraw their applications, however, are willing to consider any proposals that LOR may have at this stage.

Paragraph 3: I would also like to mentioned and confirm, that we discussed the issues around your documents, which contained proprietary information, of both this company and various independent consultants, to this Company. I acknowledge your explanation, but we do need to engage further with the respective role-players. As mentioned, there are allegations of plagiarism and misrepresentation, which need to be addressed and put to bed.

We challenge the claims of plagiarism. The Draft Scoping Reports prepared for the prospecting right applications is a generic DMR template populated per heading by the EAP. The data about the geology and bulk sampling method have been supplied to Naledzi by NDI Geological Consulting Services (Pty) Ltd in the Prospecting Works Programmes for the applications. As explained to LOR, we have not been able to access the prospecting focus areas, and therefore the Scoping Reports are based on a desktop analysis. Data pertaining to the receiving environment and its social surroundings, as stated under section iv (1) (a) of the respective Scoping Reports, have been sourced through preliminary specialist inputs, desktop analysis and use of tools such as Geographic Information Systems including reference to previously completed EIA Reports for current mining operations where available, you should know that some of these documents are already in the public domain and accessible. Information used from previously completed EIA / Scoping Reports have been cited in the draft Scoping Reports.

LOR has now also denied us access to the bulk of the prospecting focus areas which limits our ability to gather site-specific data.

Paragraph 4: As a consequence of the above, and given that the areas that you wish to visit fall within LOR Mining Right and Lease area (the Area), and in my capacity as CEO of the Company, as well as in my Capacity in terms of section 2(a)(1) of the MHSA, you are not authorised, nor given permission, to enter the Area. Entry into the Area constitutes, amongst other offences, a criminal offence. Please be advised that, if you, or anybody else who is unauthorised to be on the property, enter the Area you will be arrested, and removed to the nearest Police station, and charged accordingly. Please be further advised that the towns of Sendelingsdrift (Reuning) and Baken are included in this jurisdiction. As

discussed on the phone I am truly sorry that you, and your colleagues find yourselves caught up in this. Should you have any queries please do not hesitate to make contact with me.

The denied access is acknowledged. We have received the formal letter from Mr Peter van Rooyen, LOR Legal Manager. We have cancelled our scheduled site inspections and have informed the DMRE of the access challenges to the application areas. DMRE will need to advise and provide a way forward.

Please do not hesitate to contact us should you require clarity.

Regards,

A handwritten signature in black ink, appearing to read 'M Botha', with a long horizontal flourish extending to the right.

Marissa Botha (*Pr.Sci.Nat*)
Naledzi Environmental Consultants Pty Ltd
160 Marshall Street, Polokwane, 0700,
Tel: 015 296 3988 Fax: 015 296 4021 Cell: 084 226 5584 (Marissa)
Email: botham@naledzi.co.za

Attachments

Annexure 1 – Proof of emailed notifications to LOR by Naledzi

Annexure 2 – Proof of consultation by Samara Mining Pty Ltd

Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Marissa Botha <botham@naledzi.co.za>

Sat 11/14/2020 7:53 AM

To: rgevcpa@gmail.com <rgevcpa@gmail.com>; ruwayda.baulakay@dpw.gov.za <ruwayda.baulakay@dpw.gov.za>; Brent.whittington@sanparks.org <Brent.whittington@sanparks.org>; Meghan.Diergaardt@sanparks.org <Meghan.Diergaardt@sanparks.org>; Briston.Adams@sanparks.org <Briston.Adams@sanparks.org>; theodor.boshoff@gmail.com <theodor.boshoff@gmail.com>; johan@lor.co.za <johan@lor.co.za>; jamie@lor.co.za <jamie@lor.co.za>; marina@lor.co.za <marina@lor.co.za>; annabock2019@gmail.com <annabock2019@gmail.com>; willielinks@vodamail.co.za <willielinks@vodamail.co.za>; Sydney@richtersveld.gov.za <Sydney@richtersveld.gov.za>; francois@richtersveld.gov.za <francois@richtersveld.gov.za>; ivan@richtersveld.gov.za <ivan@richtersveld.gov.za>; sanddrift@richtersveld.gov.za <sanddrift@richtersveld.gov.za>; eksteenfontein@richtersveld.gov.za <eksteenfontein@richtersveld.gov.za>; kuboos@richtersveld.gov.za <kuboos@richtersveld.gov.za>; chris@namakwa-dm.gov.za <chris@namakwa-dm.gov.za>; jloubser@namakwa-dm.gov.za <jloubser@namakwa-dm.gov.za>; info@namakwa-dm.gov.za <info@namakwa-dm.gov.za>

Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>

 2 attachments (190 KB)

I&AP DSR Notification Letter_.pdf; Comment Sheet - Draft Scoping Report.pdf;

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

An application will also be submitted to the Department of Water and Sanitation in terms of the South African National Water Act 36 of 1998 for a Water Use License.

The prospecting right application areas (PRAA) include:

Applications	Property	Size
PRAA 1 – (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11	987.98 Ha
PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za

Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Marissa Botha <botham@naledzi.co.za>

Tue 11/17/2020 1:43 PM

To: cdk@lor.co.za <cdk@lor.co.za>; chorn@trevali.com <chorn@trevali.com>; pgowaseb@yahoo.com <pgowaseb@yahoo.com>; metrosphinah@iway.na <metrosphinah@iway.na>; RHailume@nwr.com.na <RHailume@nwr.com.na>; Nicolas.Makey@dha.gov.za <Nicolas.Makey@dha.gov.za>; Nicolas.Makey@dha.gov.za <Nicolas.Makey@dha.gov.za>; Patrick.davids@dha.gov.za <Patrick.davids@dha.gov.za>; virginivanwyk@dha.gov.za <virginivanwyk@dha.gov.za>; vanderwesthuizen@saps.gov.za <vanderwesthuizen@saps.gov.za>
Cc: NDIVHUDZANNYI MUDAU <atshidzaho@gmail.com>

📎 4 attachments (2 MB)

I&AP DSR Notification Letter_.pdf; Comment Sheet - Draft Scoping Report.pdf; PRAA 1_Appendix 3_Location Map REGULATION 2(2) - 12664.pdf; PRAA 2_Appendix 3_Location Map REGULATION 2(2)[1] 12663.pdf;

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

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The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

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PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

The draft Scoping Reports are available for public review from Friday 13 November until Monday 14 December 2020. Electronic versions of the reports and a comment sheet are available on the Naledzi website: <http://www.naledzi.co.za/public-documents-naledzi.php>

Naledzi | Environmental Consultants

Naledzi is a 100% black owned and managed company with a Level 1 BEE rating. [READ MORE](#)

www.naledzi.co.za

Hard copies of the reports are available from the following public venues within the Richtersveld, Northern Cape, South Africa:

- Sanddrif, Alexander Bay, Lekkersing, Eksteenfontein and Kuboes in the Richtersveld
- SANPARKS Office, 1 Marshall Street in Sendelingsdrif, Richtersveld National Park

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
160 Marshall Street, Polokwane, 0699
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za



**LOWER ORANGE RIVER
DIAMONDS**

Wednesday 18 November 2020

The Director
Samara Mining (Pty) Ltd
P.O. Box 11124
Hadison Park
KIMBERLEY

per e-mail: sim.dywili@gmail.com
attention : Dr Anthony Dywili
cc : Mr Hannes van Staden
per e-mail: hannes@dgbm.co.za

Dear Dr Dywili

APPLICATION FOR PROSPECTING WITH BULK SAMPLING: SAMARA MINING (PTY) LTD

Our letter of Monday 16 November 2020 addressed to Mr Hannes van Staden of Diamond Group and Base Metals (Pty) Ltd ("DGBM") and the thereon following meeting at Stellenbosch with Mr Hannes van Staden of DGBM and yourself representing Samara Mining (Pty) Ltd ("Samara") on 18 November 2020 has reference.

We thank you for what we trust were frank and honest discussions relating to the Samara application. We look forward to receiving your communication within the next fortnight as to:

Whether Samara will proceed with this application so as to enable LOR to timeously register as an interested and affected party and submit our comments to the relevant authorities;

or

Whether Samara will withdraw the application and embark upon exploratory talks with LOR to consider proposals of mutual co-operation.

Yours faithfully

Peter van Rooyen
Manager: Legal
(082-923 1815)
petervr@lor.co.za

Head Office: 1st Floor, Block B, De Wagenweg Office Park, Stellantia Street, Stellenbosch, 7600
Operational Address: Baken Mine, Lower Orange River Complex, Alexander Bay, Northern Cape, 8290
Postal Address: PO Box 31, Stellenbosch, 7600
Tel: 027 831 1495 Email: info@lor.co.za



SAMARA MINING

Reg No: 2018/002865/07

tel: 053 861 1575

fax: 064 542 5463

email: samaramining1@gmail.com

26 November 2020

Dear Peter

We refer to your letter dated 18 November 2020 and our failure to address each and every aspect thereof should not be construed as an admission thereof and all our rights are reserved.

Samara Mining (PTY) Ltd will not withdraw its application as any exploratory talks to consider a mutual co-operation will then be futile and the procedure would need to start afresh. We are however willing to consider any proposals that you may have at this stage.

We trust that you find the above in order.

Kind Regards

Dr. Simphiwe Mc Anthony Dywili

C.E.O Director

Tel: 053 861 1575

Cell: 064 522 3506

Email: dr@samaramining.com/sim.dywili@gmail.com

SAMARA MINING

10 Industrial Road, Barkly West, 6375 | PO Box 11124, Kimberley, 8306 | tel: 053 861 1575 | fax: 064 542 5463 | email: samaramining1@gmail.com



COMMENT SHEET FOR DRAFT SCOPING REPORTS

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA) APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT OF THE NORTHERN CAPE PROVINCE

Prospecting Right Application Area (PRAA)	DMR Reference Number	Property
PRAA 1	NCS 30/5/1/1/2/1 (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11
PRAA 2	NCS 30/5/1/1/2/1 (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18

EAP CONTACT INFORMATION: Naledzi Environmental Consultants Pty Ltd
 Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700
 160 Marshall Street, Polokwane
 Tel: 015 296 3988 Fax: 015 296 4021
 Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond)
 Email: botham@naledzi.co.za or dmusetsho@naledzi.co.za

TITLE (Prof/Mr/Mrs)	MS	FIRST NAME	BERTCHEN
SURNAME	KOHRS		
CAPACITY (eg. Director/Secretary)	CHAIR		
ORGANISATION	EARTHLIFE NAMIBIA		
POSTAL ADDRESS	Box 24829 WINDHOEK	POSTAL CODE	9000
TEL NO:	+264(0)61 227913	CELL NO:	+264(0)81 293 8085
FAX NO:	N/A	EMAIL ADDRESS:	earthlife@insay.na
APPLICATION AREA TO WHICH YOUR COMMENT RELATES: (Please tick box)	PR 12664 – PRAA 1	PR 12663 – PRAA 2	ALL : <input checked="" type="checkbox"/>

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

Unfortunately, I could only connect 1 hour late and missed a lot of information during the Zoom event today

My Q

What will happen to all the ambitious plans on the social sector as was outlined by Dr. Dyrkals and which will certainly raise high expectations amongst the communities, if no diamonds will be found?

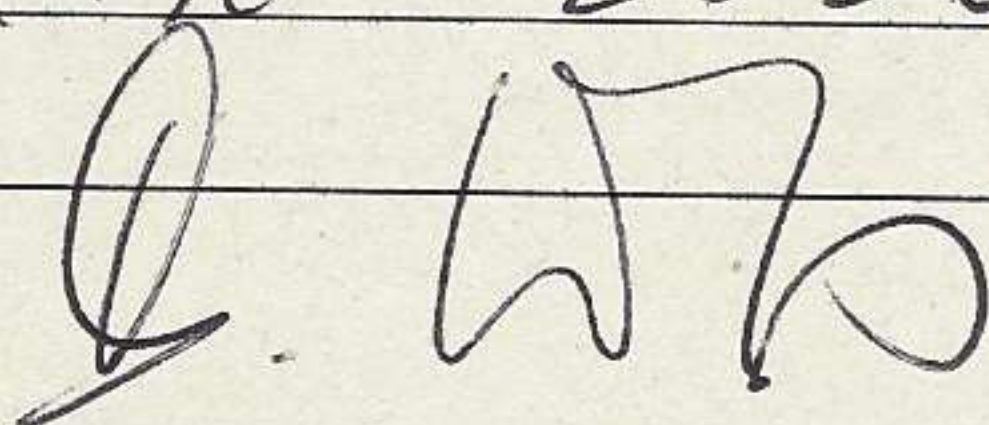
NAME & SURNAME:

Kohrs, Bettina

DATE:

14.12.2020

SIGNATURE:





environment, forestry & fisheries

Department
Environment, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

Environment House, 473 Car Drive 584 Street (Old Beetham Street and Suspensieboom Street, Arcadia / Postnet Bag 9447, Pretoria, 0001)

Ref: NC30/5/1/1/2/12053

Enquiries: Mr Thiyahloai Nethononda

Tel: (012) 359 9553 Fax: (012) 359 3636, E-mail: lnethononda@environment.gov.za

Dr Anthony Dywili
Samara Mining (Pty) Ltd
P.O. Box 11124
KIMBERLY
8306

Fax: (086) 541 5463

Email: totham@naledzi.co.za

Attention: Dr Dywili

COMMENTS ON THE DRAFT SCOPING REPORT (PRAA2) FOR SAMARA MINING (PTY) LTD APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING WITH BULK SAMPLING ON THE LEFT BANK OF THE ORANGE RIVER, BOUNDARY TO PORTION OF THE REMAINDER OF THE FARM NO. 18 RICHTERVELD, NAMAQUALAND DISTRICT, NORTHERN CAPE.

Background and Discussion

The Directorate: Protected Areas Planning and Management Effectiveness, would like to thank you for the opportunity to review the proposed Draft Scoping Report (DSR) on the application for alluvial Diamond prospecting with bulk sampling on the left bank of the Orange River, boundary to portion of the remainder of the farm no. 18 in Richtersveld and wish to make the following comments and the our comments are specific to protected areas Act and its regulations.

Compliance with the National Environmental Management Protected Areas Act (NEMPPA), Act No. 57 of 2003

- Section 49, NEMPPA Prospecting and mining activities in protected area

Despite other legislation, no person may conduct commercial prospecting, mining, exploration, production or related activities -

- (a) in a special nature reserve, national park or nature reserve;

Prospecting Right Application Area (PRAA 2)

- The report indicated that the Prospecting Right Application Area (PRAA 2) is situated on the lower Orange River on the north-western boundary of the Richtersveld National Park on the border between South Africa and Namibia, approximately 80km from Alexander Bay and 10km from Sendingsdriif in the Northern Cape.
- Report also indicated that Samara mining will prospect for alluvial diamonds within the 100 year flood line of the Orange River inside the national park which is prohibited by NEMPAA sec 42.
- The report is not correct to indicate that the prospecting will be in the boundary of the national park while the prospecting will be inside the national park.
- The Richtersveld National park was declared in 16 August 1991, copy of government gazette was circulated to the EAP.
- Samara Mining (Pty) Ltd is not allowed to conduct mining activities in the PRAA 2 which is inside the national park.

Prospecting Right Application Area (PRAA 1)

- The report indicated that the Prospecting Right Application Area (PRAA 1) is situated on the left bank of the lower Orange River at Sanddrif, on the border between South Africa and Namibia, approximately 30km from Alexander Bay in the Northern Cape.
- Samara mining will prospect for alluvial diamonds within the flood line of the Orange River and focus on four (4) prospecting pockets (pockets 1, 2, 3A and 3B) on the bed, banks and active channel of the river, within the greater PRAA.
- The PRAA 1 is not affecting national protected area but provincial department of Nature Conservation in Kimberly must be consulted as a management authority of the Orange River Mouth Nature Reserve.
- The developer is not allowed to extract or mine the sand or water and other minerals without the approved water use license and mining permits which need to be applied from the departments of Human Settlement, Water and Sanitation and Mineral Resource and Energy.

In conclusion, the Directorate Protected Areas Planning and Management Effectiveness will further provide technical comments on the final Scoping Report.



Mr. Inhamitso Abantso

Acting Director - General

Department of Environment, Forestry and Fisheries

Letter signed by: Ms. Amanda Dana-Mkhali

Director Protected Areas Planning and Management Effectiveness (Acting)

Date: 15/12/2020

Ons het nie die volgende dokumente gekry nie

- Scoping reporte vir verskillende myn areas nie
- Visuele scoping report
- Grondwater verslae en report
- Mynplanne
- En al die aanhangsels wat saam met die aansoek gaan

Verder eis ons :

DIE VOLLE AANSOEK + DIE VOLLE MYNAANSOEK MET NAME ADRESSE VAN AANSOEKERS NA ONS GESTUUR MOET WORD : NS , VOLGENS WET IS ONS GERGTIG DAAROP - SIEN DIE SAAK NO : 9628/2015], TUSSEN Duduzile Baleni & Others v Regional Manger: Eastern Cape Department of Mineral Resources & Others . ALLE INLIGTING MOET IN AFRIKAANS WEES EN ONS EIS HIERDIE INLIGTING SODAT ONS INGELIGTE BESLUTE KAN MAAK. ONS IS GEREKTIG DAAROP , ONS KAN NIE BESLUTE NEEM SONDER GOEIE INLIGTING NIE ONS VERSOEK DAT HIERDIE INLIGTING VOOR SLUITINGS DATUM VAN AANSOEK AAN ONS GESTUUR MOET WORD , 14 DESEMBER 2020.

Ek en die volgende gemeenskaplede verwerp die aansoek van SAMARA om die volgende redes:

Ons het geen Vooraf inligting ontvang nie en kan nie toestemming verleen nie,

ONS DIE GRONDEIENAARS HET GEEN VOORAF INLIGTING GEKRY NIE, ONS KAN GEEN KOMMENTAAR LEWER SONDER VOORAF GOEDKEURING NIE ;

Die wet noem die grondeienaars, moet Vooraf inligting verkry om 'n besluit te maak te maak , nie Konsultering nie.

- Daar was geen konsultasie met Richtersvelders – wat die wettige grondeienaars is .
- Vergadering uitgestel, gemeenskap dra geen kennis van die SAMARA aansoek nie
- Ons het geen dokumentasie ontvang nie, ons is nie ingelig – die konsultant het slegs boodskappe gestuur en kennisgewings laat aanbring.

- Ons HOOR hulle gaan in die rivier myn:

Hoe gaan hulle daar kom? - wat van bedreigde plante?

Waar gaan hulle paaie maak?

Die rivier is geoormerk vir Besproeiing, nie vir Myne nie

Die noem wet GEEN nuwe myne mag toegelaat word in die Park nie

Die wet noem GEEN myne in die wereld erfenis gebied nie

Ons voorouers se grafte is ooral langs die rivier.

DIE VOLLE GEOOGDE MYN HUUR AREA IS HEILIGE GROND VIR DIE NAMA GRONDEIENAAR VAN DIE RICHTERSVELD

ONS HET VOLLE **MINERAAL EN GRONDEIS** TEEN TRANSHEX MYNHUUR AREA IN DIE GRONDEISE HOF

Die konsultant het geen van bogenoemde redes in aanmerking geneem nie
DIE NAMA VAN DIE RICHTERSVELD IS DIE WETTIGE EIENAAR VAN DIE
RICHTERSVELD ALVORENS ENIGE MYNAANSOEK SLAAG MOET ONS
TOESTEMMING GEE.

WJ Croete 14/12/2020

LEKKERSING GEMEENSAP- SAMARA KOMMENTAAR

PRESENSIELYS - 14 DESEMBER 2020

	NAAM EN VAN	GEBOORTE DATUM	ERF NR	HANTEKENING
1	Willelm Jasper Cloete	27.02.1955	Boomstr 112 LekkerSing	WJ Cloete → Willem Cloete
2	Leneata Cloete	15.04.1991	Boomstr. 112	L Cloete
3	LATH. R. Cloete	24/12/86	Bergstr 153	[Signature]
4	LESWILL Cloete	08/08/1999	Boomstr 112	L Cloete
5	CHRISTINA MATTHYS	1963	Bergstraat 153	C Matthys
6	Paulina Straus	1/1/1947	Bloetestraat 219	P Straus
7	Rooz Berggaardt	1-2-1967	Cloetestraat 221	R Berggaardt
8	ROMANO NERO	20/11/1998	Cloetestr. 176	[Signature]
9	Danzil Matthys	13/11/1997	Cloetestr. 222	D Matthys
10	Mirthle Cloete	17/4/1964	cloetestraat 108	M Cloete
11	Alisa Cloete	30/09/1994	cloetestraat 110	A Cloete
12	Hans berggaardt	25/06/1942	cloetestraat 110	H. Biergaardt
13	Katrina Biergaardt	14/05/1946	cloetestraat 110	K. Biergaardt
14	Johannes Cloete	2/2/1962	cloetestraat 108	J Cloete
15	Abraham Fieland	6/12/1955	cloetestraat 106	A Fieland
16	Miniam Fieland	30/8/1967	cloetestraat 106	M Fieland
17	Patmorisa Magerman	25/4/1992	cloetestraat 106	P Magerman
18	Elna Cloete	14/12/2020	Barden Street 4-4	E Cloete

	NAAM & VAN	GEBORTE DATUM	ERF NOMMER	HANDTEKENING
19	Raymond Cloete	26-04-1987	Kol Lekkersing	
20	Brentan Fieland	4-10-1985	UOHE STR 91	B. Fieland
21	J. P. Cloete	65.01.08	Cloete STR 218	
22	K. R. Cloete	1975-07-27	STOEP STR 244	
23	J. P. Cloete	03.05.60	Cloete Straat 77	
24	A. Cloete	14-02-87	DE WET STRAAT 101	
25	M. Cloete	14-02-53	DE WET STRAAT 101	M. Cloete
26	A. A. Bete	04-12-54	DE WET STRAAT 101	
27	Julanda Fieland	18/08/1981	DE STOEP 249	J. Fieland
28	Phisoa Fieland	19/02/1986	DE STOEP 249	
29	Lekkie Cloete	10-11-1962	Cloete Straat 91	L. Cloete
30	Amelda Mottys	08-09-1977	DE WET STRAAT 70	
31	Katrina Cloete	21-12-1969	DE WET STRAAT 259	K. Cloete
32	Katheriene. C. Diergaard	28.01.1966	DE WET STRAAT 103	K. C. Diergaard
33	Suzanne Abraham	29-01-1974	DE WET STRAAT	
34	Growthin Links	9906165788086	ERF 90	
35	Anna Cloete	21-2-1948	ERF 144	
36	Kees Stoffel	21.2.1948	ERF 197	
37	Robert Strauss	15/12/1940	DE WET STRAAT 27	

COMMENT SHEET FOR DRAFT SCOPING REPORTS

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA)
APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS
WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE
RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT
OF THE NORTHERN CAPE PROVINCE**

Prospecting Right Application Area (PRAA)	DMR Reference Number	Property
PRAA 1	NCS 30/5/1/1/2/1 (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11
PRAA 2	NCS 30/5/1/1/2/1 (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18

EAP CONTACT INFORMATION: Naledzi Environmental Consultants Pty Ltd
 Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700
 160 Marshall Street, Polokwane
 Tel: 015 296 3988 Fax: 015 296 4021
 Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond)
 Email: botham@naledzi.co.za or dmusetsho@naledzi.co.za

TITLE (Prof/Mr/Mrs)	Dr.	FIRST NAME	CHRIS
SURNAME	BROWN		
CAPACITY (eg. Director/Secretary)	CEO		
ORGANISATION	NAMIBIAN CHAMBER OF ENVIRONMENT		
POSTAL ADDRESS	PO Box 40723 AUSSPANNLATZ WILDSHOCK NAMIBIA	POSTAL CODE	—
TEL NO:	+264 61 240140	CELL NO:	
FAX NO:	—	EMAIL ADDRESS:	ceo@m-c-e.org
APPLICATION AREA TO WHICH YOUR COMMENT RELATES: (Please tick box)	PR 12664 – PRAA 1	PR 12663 – PRAA 2	ALL : <input checked="" type="checkbox"/>

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

1. Water use / abstraction
2. Changes in river flow - diverting flow
3. Impact on aquatic flora + fauna.
4. Visual impact - sense of place.
5. Impact on the transboundary M-Ais/Richtersveld Landscape.
6. Impact on tourism.
7. Poaching + illegal collection of natural resources.
8. Illegal crossing of river (border) by staff.
9. Impact on rural lives + livelihoods.

NAME & SURNAME:

Chris Brown

DATE:

16/11/2023

SIGNATURE:



RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Christopher Brown <ceo@n-c-e.org>

Mon 11/16/2020 9:33 AM

To: Marissa Botha <botham@naledzi.co.za>

📎 1 attachments (712 KB)

Orange River S bank diamond prospecting.pdf;

Dear Marissa,

Please register me as an I&AP on the above applications. I have listed my broad concerns on the attached form – have not yet had a chance to review the draft Scoping Report.

Kind regards,

Dr Chris Brown



20 Nachtigal Street, Ausspannplatz, Windhoek
PO Box 40723, Ausspannplatz, Windhoek, Namibia

Tel: +264 (0)61 240 140

NCE Mobile: +264 (0)81 162 5807

e-mail: ceo@n-c-e.org

www.n-c-e.org

NCE democratizes access to environmental information at www.the-eis.com - **Namibia's one-stop-shop for retrieving, submitting and publishing environmental information**

From: Marissa Botha <botham@naledzi.co.za>

Sent: Saturday, 14 November 2020 07:54

To: rgevcpa@gmail.com; ruwayda.baulakay@dpw.gov.za; Brent.whittington@sanparks.org; Meghan.Diergaardt@sanparks.org; Briston.Adams@sanparks.org; theodor.boshoff@gmail.com; johan@lor.co.za; jamie@lor.co.za; marina@lor.co.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; sanddrift@richtersveld.gov.za; eksteenfontein@richtersveld.gov.za; kuboos@richtersveld.gov.za; chris@namakwa-dm.gov.za; jloubser@namakwa-dm.gov.za; info@namakwa-dm.gov.za; Mangalane.dutoit@drrdlr.gov.za; HlenganiA@dws.gov.za; CloeteS@dws.gov.za; Sekwailak@dws.gov.za; mulaudzin@dws.gov.za; peter.denc87@gmail.com; sdelafontaine@gmail.com; darrenengelbrecht@gmail.com; rtimothy@nbkb.org.za; knaude@environment.gov.za; Tnethononda@environment.gov.za; smunzhedzi@environment.gov.za; mulaudzin@dws.gov.za; rtimothy@nbkb.org.za; erica@nhc-nam.org; helena@nhc-nam.org; erodrigues@mme.gov.za; eshivolo@mme.gov.za; grashatsh@yahoo.com; salomon@nhc-nam.org; 264811245698@mtcmobile.com.na; Christopher Brown <ceo@n-c-e.org>; NCE Admin <admin@n-c-e.org>; gabriela@mail.na; gabriela@mail.na; sisavva@venus.com.na; tnshaanika@ncci.org.na; wbcci@iway.na; cetn@iafrica.com.na; earthl@iway.na; Elinor@iway.na; opmystoep@iway.na; shepherds@iway.co.za; John.pallet@saiea.com; ceo@boegoebergwater.co.za; info@boegoebergwater.co.za; alvina@lantic.net; ceokwgv@isat.co.za; rita@nelenvennote.co.za; kobus@nelenvennote.co.za; lizellewater@yahoo.com; hanke@oranjeriet.co.za; neverstop@lantic.net; rsbrink@telkomsa.net; loxton@itssnet.co.za; gannabos@tomail.co.za; andre@oberholzerfarms.co.za; awievwyk@telkomsa.net; jjh@lantic.net;

louiswater@vodamail.co.za; info@kalahariwater.co.za; dirk@kalahariwater.co.za; wjhanekom@lantic.net; kleinbegin@lantic.net; soetwater@lantic.net; chamberlainstanley@gmail.com; bmvanzyl@telkomsa.net; gerhardhleroux@gmail.com; nckarate@hotmail.co.za; cp@live.co.za; peu@rekopane-estates.co.za; johannita@carpediemfarms.co.za; hanlie@dutoitvdheever.co.za; uptbesproei@cybersmart.co.za; waterowerheid@gmail.com; smarttsin@gmail.com; chrisf@namakwa-dm.gov.za; tedbezuidenhout@khaima.gov.za; Municipal.Manager@namakhoi.gov.za; re-annb@alexkor.co.za; davidb@alexkor.co.za; JoshuaC@TRANSHEX.co.za; frans.vanrooyen@sanparks.org; lenka.thamae@orasecom.org; nngcaba@environment.gov.za; stanleyt@environment.gov.za; info.ncwf@gmail.com; ramolopp@gmail.com

Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>

Subject: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Importance: High

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

An application will also be submitted to the Department of Water and Sanitation in terms of the South African National Water Act 36 of 1998 for a Water Use License.

The prospecting right application areas (PRAA) include:

Applications	Property	Size
PRAA 1 – (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11	987.98 Ha
PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha

Naledzi Environmental Consultants Pty Ltd

Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za

Re: Interested party.

Marissa Botha <botham@naledzi.co.za>

Tue 11/17/2020 9:12 AM

To: Itumeleng Mashune <Itumeleng.Mashune@drdlr.gov.za>

Good morning Itumeleng,

I hereby confirm receipt of your registration as I&AP and will now be included on the database. You will receive all further notifications and invitations to scheduled public engagements that will be released soon.

Regards,

Marissa Botha

Naledzi Environmental Consultants Pty Ltd

Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za

From: Itumeleng Mashune <Itumeleng.Mashune@drdlr.gov.za>

Sent: Tuesday, November 17, 2020 9:06 AM

To: Marissa Botha <botham@naledzi.co.za>

Subject: Interested party.

Good day sir

Please register myself as an interested party regarding the land in richtersveld no. 11

Kind regards

Itumeleng Mashune

Department Agriculture, Land Reform, Rural Development

0798760481/ 053 830 4000.

Sent from my Samsung Galaxy smartphone.

Re: I&AP

Marissa Botha <botham@naledzi.co.za>

Tue 11/17/2020 9:19 AM

To: Ronel van der Merwe <ronelvdmerwe@gmail.com>

Good morning, Ronel,

Thank you for your registration. Your details have been added to the I&AP Database. We will be sending you all the project notifications and invitations to public engagement meetings (either virtual or onsite). For key stakeholders across the border, we will host virtual meetings, since the borders are still closed to and from Namibia.

Regards,

Marissa Botha

Naledzi Environmental Consultants Pty Ltd

Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za

From: Ronel van der Merwe <ronelvdmerwe@gmail.com>

Sent: Tuesday, November 17, 2020 9:16 AM

To: Marissa Botha <botham@naledzi.co.za>

Subject: I&AP

Hi Marissa

I'd like to register as an I&AP for the mining application of Samara mining.

Thank you

Ronel

Sustainability Manager

ronel@omdis.co

0813178349

RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Brent Whittington <brent.whittington@sanparks.org>

Tue 11/17/2020 12:21 PM

To: Marissa Botha <botham@naledzi.co.za>

Good morning Marisa,

I have not gone through your list of stakeholders however the following come to mind which you can confirm:

African Star minerals, Oena Mine, Theodor Boshof, theodor.boshoff@gmail.com

Lower Orange River Diamonds, Chris Kimber, cdk@lor.co.za

Trevali, Christo Horn, chorn@trevali.com

Ministry of Environment and Tourism Namibia, Paul Gowaseb, pgowaseb@yahoo.com

Ministry of Environment and Tourism Namibia, Wayne Handley metroshpinah@iway.na

Namibian Wildlife Resorts, Robert Hailume RHailume@nwr.com.na

Rosh Pinah Town

Richtersveld communities (Sandrift, Kuboes, Lekkersing and Eksteenfontein)

Department of Environment, Forestry and Fisheries (DEA/DEFF/DFFE)

Department of Water and Sanitation

South African Police Services

Department of Immigrations

Department of Nature Conservation Northern Cape

Bouvelon farms

Alexanderbay town

Oranjemund town

Port Nolloth town

Should I be made aware of any other stakeholders, I will be sure to send these on.

Regards,

Brent Whittington

Park Manager

/Ai/Ais-Richtersveld Transfrontier Park (RSA side)

PO Box 406, Alexander Baai, 8290

Tel : 027 8311506

Cell : 071 170 2824

brent.whittington@sanparks.org

www.sanparks.org

Vision statement: 'A sustainable National Parks System Connecting Society'

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

Sent: 14 November 2020 07:54

To: rgevcpa@gmail.com; ruwayda.baulakay@dpw.gov.za; Brent Whittington

<brent.whittington@sanparks.org>; Meghan Diergaardt <Meghan.Diergaardt@sanparks.org>; Briston Adams <Briston.Adams@sanparks.org>; theodor.boshoff@gmail.com; johan@lor.co.za; jamie@lor.co.za; marina@lor.co.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; sanddrift@richtersveld.gov.za; eksteenfontein@richtersveld.gov.za; kuboos@richtersveld.gov.za; chris@namakwa-dm.gov.za; jloubser@namakwa-dm.gov.za; info@namakwa-dm.gov.za; Mangalane.dutoit@drrl.gov.za; HlenganiA@dws.gov.za; CloeteS@dws.gov.za; Sekwailak@dws.gov.za; mulaudzin@dws.gov.za; peter.denc87@gmail.com; sdelafontaine@gmail.com; darrenengelbrecht@gmail.com; rtimothy@nbkb.org.za; Karl Naude <knaude@environment.gov.za>; Tnethononda@environment.gov.za; smunzhedzi@environment.gov.za; mulaudzin@dws.gov.za; rtimothy@nbkb.org.za; erica@nhc-nam.org; helena@nhc-nam.org; erodrigues@mme.gov.za; eshivolo@mme.gov.za; grashatsh@yahoo.com; salomon@nhc-nam.org; 264811245698@mtcmobile.com.za; ceo@n-c-e.org; admin@n-c-e.org; gabriela@mail.na; gabriela@mail.na; sisavva@venus.com.na; tnshaanika@ncci.org.na; wbcci@iway.na; cetn@iafrica.com.na; earthl@iway.na; Elinor@iway.na; opmystoep@iway.na; shepherds@iway.co.za; John.pallet@saiea.com; ceo@boegoebergwater.co.za; info@boegoebergwater.co.za; alvina@lantic.net; ceokwgv@isat.co.za; rita@nelenvennote.co.za; kobus@nelenvennote.co.za; lizellewater@yahoo.com; hanke@oranjeriet.co.za; neverstop@lantic.net; rsbrink@telkomsa.net; loxton@itssnet.co.za; gannabos@tomail.co.za; andre@oberholzerfarms.co.za; awievwyk@telkomsa.net; jjh@lantic.net; louiswater@vodamail.co.za; info@kalahariwater.co.za; dirk@kalahariwater.co.za; wjhanekom@lantic.net; kleinbegin@lantic.net; soetwater@lantic.net; chamberlainstanley@gmail.com; bmvanzyl@telkomsa.net; gerhardhleroux@gmail.com; nckarate@hotmail.co.za; cp@live.co.za; peu@rekopane-estates.co.za; johannita@carpediemfarms.co.za; hanlie@dutoitvdheever.co.za; uptbesproei@cybersmart.co.za; waterowerheid@gmail.com; smarttsin@gmail.com; chris@namakwa-dm.gov.za; tedbezuidenhout@khaima.gov.za; Municipal.Manager@namakhoi.gov.za; re-annb@alexkor.co.za; davidb@alexkor.co.za; JoshuaC@TRANSHEX.co.za; Frans Van Rooyen <frans.vanrooyen@sanparks.org>; lenka.thamae@orasecom.org; nngcaba@environment.gov.za; stanleyt@environment.gov.za; info.ncwf@gmail.com; ramolopp@gmail.com

Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>

Subject: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Importance: High

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

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As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
 Naledzi Environmental Consultants Pty Ltd
 Email: botham@naledzi.co.za
 Cell: 084 226 5584
www.naledzi.co.za

 [More information on Covid-19](#)

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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: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Donovan Majiedt <don@honeyinc.co.za>

Tue 11/17/2020 12:50 PM

To: Marissa Botha <botham@naledzi.co.za>; aslick@iafrica.com <aslick@iafrica.com>

Cc: pieterdewet099@gmail.com <pieterdewet099@gmail.com>

Noted thanks.

From: Marissa Botha <botham@naledzi.co.za>

Sent: Tuesday, 17 November 2020 12:34

To: Donovan Majiedt <don@honeyinc.co.za>; aslick@iafrica.com

Cc: pieterdewet099@gmail.com

Subject: Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Dear Stakeholder,

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Naledzi is a 100% black owned and managed company with a Level 1 BEE rating. [READ MORE](#)

www.naledzi.co.za

Hard copies of the reports are available from the following public venues within the Richtersveld, Northern Cape, South Africa:

- Sanddrif, Alexander Bay, Lekkersing, Eksteenfontein and Kuboes in the Richtersveld
- SANPARKS Office, 1 Marshall Street in Sendelingsdrif, Richtersveld National Park

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha

Naledzi Environmental Consultants Pty Ltd

160 Marshall Street, Polokwane, 0699

Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za

Donovan Majiedt

Director

Phone: (+27) 051 403 6730 /
0828972647

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Email: don@honeyinc.co.za

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Re: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Marissa Botha <botham@naledzi.co.za>

Wed 11/18/2020 10:14 AM

To: Roets Wietsche <RoetsW@dws.gov.za>

Cc: Mulaudzi Nkhumbudzeni <mulaudzin@dws.gov.za>; Ackerman Pieter <AckermanP@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Meulenbeld Paul <MeulenbeldP@dws.gov.za>; Khosa Tsunduka <KhosaT@dws.gov.za>; Naidoo Bronwyn Roxanne <NaidooB@dws.gov.za>; Hlengani Alexia (UPN) <HlenganiA@dws.gov.za>

Morning Dr Roets,

Noted. A Water Use License Application will be submitted to the DWS: Orange Proto once all details on the project have been finalised.

We have from the onset been in communication with the DWS Upington Office (Alexia Hlengani) and a hard copy of the Draft Scoping Reports have been sent to their offices including emailed notifications of the applications.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd

Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za**From:** Roets Wietsche <RoetsW@dws.gov.za>**Sent:** Wednesday, November 18, 2020 9:37 AM**To:** Marissa Botha <botham@naledzi.co.za>**Cc:** Mulaudzi Nkhumbudzeni <mulaudziN@dws.gov.za>; Ackerman Pieter <AckermanP@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Meulenbeld Paul <MeulenbeldP@dws.gov.za>; Khosa Tsunduka <KhosaT@dws.gov.za>; Naidoo Bronwyn Roxanne <NaidooB@dws.gov.za>; Hlengani Alexia (UPN) <HlenganiA@dws.gov.za>**Subject:** RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Please note that the regional office of DWS is the entry point for all information. Further note that these activities may require a water use authorisation. The location of the proposal may prejudice this application.

Kind regards

Wietsche Roets (PhD) Pr.Sci.Nat.

Specialist Scientist

Directorate: Water Abstraction and In-stream Use

Sub-Directorate: In-stream Water Use

185 Francis Baard Street, Sedibeng Bldg, Room 437A

P/Bag X313, PRETORIA, 0001

Tel +27(0)12 336 6510

Cell +27(0)82 604 7730

Email: RoetsW@dws.gov.za**From:** Marissa Botha [mailto:botham@naledzi.co.za]**Sent:** 17 November 2020 09:15 PM**To:** Roets Wietsche**Cc:** Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; Meulenbeld Paul; Khosa Tsunduka; Naidoo Bronwyn Roxanne; Hlengani Alexia (UPN)**Subject:** Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Good day Dr. Wietsche Roets;

Kindly note that we have couriered a hard copy of the Draft Scoping Reports to the Department of Water & Sanitation Offices in Pretoria. The reports are addressed to you. Please see the attached courier waybill and Draft Scoping Report cover letter addressed to you. The reports should be delivered by Friday, 20 November 2020 at the latest. Electronic versions of the reports and a comment sheet are available on the Naledzi website:

<http://www.naledzi.co.za/public-documents-naledzi.php>.**[Naledzi | Environmental Consultants](http://www.naledzi.co.za)**Naledzi is a 100% black owned and managed company with a Level 1 BEE rating. [READ MORE](#)www.naledzi.co.za

We would appreciate the department's comment on the applications by 14 December 2020. We have also sent a copy to the DWS Offices in Upington, Mrs. Alexia Hlengani.

Regards,

info@alexkor.com; info@namwater.com.na; plessisn@namwater.com.na; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadmin@wessa.co.za; muna@iafrica.com; Mulaudzi Nkhumbudzeni; Kuse Lumka; Roets Wietsche; Meulenbeld Paul; Khosa Tsunduka; Tonjeni Mzuvukile; Naidoo Bronwyn Roxanne; Bila-Mupariwa Ntombizanele Mary

Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng

Subject: RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Hi Marissa

Thank you for the opportunity to comment as part of the EIA process and IWULA process.

Diamond mining and coal mining are inter alia not supported within National Parks so the one application within the Richtersveld National Park is not supported from our Section..

Regards

Pieter Ackerman (PrLArch)

Chief Landscape Architect

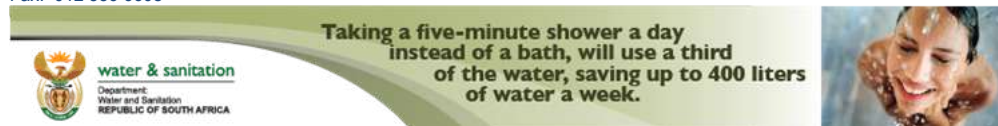
Department of Water and Sanitation (DWS), South Africa

Sub Directorate Instream Water Use

Tel: 012 336 8217

Cell: 082 807 3512

Fax: 012 336 6608



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

Sent: 16 November 2020 09:59 PM

To: Rawayda.baulackey@dpw.gov.za; siphumelelo@siteplan.co.za; AviweNyakaza.denc@gmail.com; gLetimela@ncpg.gov.za; rtimothy@nbkb.org.za; Donavan.Fullard@wessa.co.za; Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; info@roshskor.com.na; Alexander.Maasdorp@roshskor.com.na; info@roshskor.com.na; ceo@ormdtc.com.na; led@ormdtc.com.na; gscholtz@ormdtc.com.na; aunie@omdis.co; mufetip@mawf.gov.na; mujetenga08026@itc.nl; lhipondoka@mrlgh.gov.na; lhipondoka@gmail.com; vmalango@chamberofmines.org.na; welcome@fenata.org; africuri@mweb.com.na; DiguN@namibiaturism.com.na; Lgreeff-Villet@peaceparks.org; bobby@groundwork.org.za; hanneline.smit-robinson@birdlife.org.za; succulent.karoo.research.station@kabelbw.de; skepsanbi@gmail.com; e.marinus2@sanbi.org.za; gill@azef.co.za; acpico@macau.ctm.net; fernandr@macau.ctm.net; info@alexkor.com; info@namwater.com.na; plessisn@namwater.com.na; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadmin@wessa.co.za; muna@iafrica.com

Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng

Subject: Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Dear Stakeholder,

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Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za

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RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Ackerman Pieter <AckermanP@dws.gov.za>

Tue 11/17/2020 9:08 AM

To: Marissa Botha <botham@naledzi.co.za>; Rawayda.baulackey@dpw.gov.za <Rawayda.baulackey@dpw.gov.za>; siphumelelo@siteplan.co.za <siphumelelo@siteplan.co.za>; AviweNyakaza.denc@gmail.com <AviweNyakaza.denc@gmail.com>; gLetimela@ncpg.gov.za <gLetimela@ncpg.gov.za>; rtimothy@nbkb.org.za <rtimothy@nbkb.org.za>; Donovan.Fullard@wessa.co.za <Donovan.Fullard@wessa.co.za>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; info@roshskor.com.na <info@roshskor.com.na>; Alexander.Maasdorp@roshskor.com.na <Alexander.Maasdorp@roshskor.com.na>; info@roshskor.com.na <info@roshskor.com.na>; ceo@ormdtc.com.na <ceo@ormdtc.com.na>; led@ormdtc.com.na <led@ormdtc.com.na>; gscholtz@ormdtc.com.na <gscholtz@ormdtc.com.na>; aunie@omdis.co <aunie@omdis.co>; mufetip@mawf.gov.na <mufetip@mawf.gov.na>; mujetenga08026@itc.nl <mujetenga08026@itc.nl>

Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>

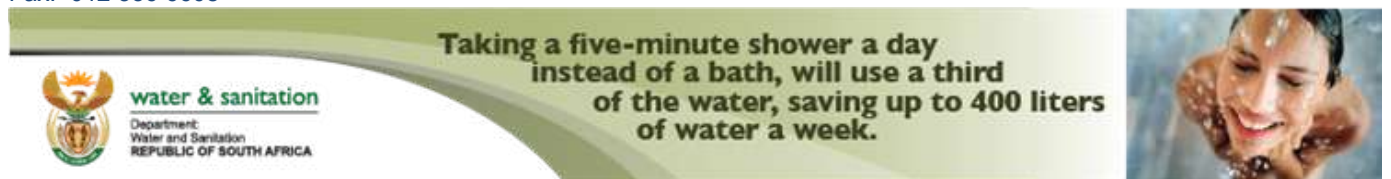
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Chief Landscape Architect
Department of Water and Sanitation (DWS), South Africa
Sub Directorate Instream Water Use
Tel: 012 336 8217
Cell: 082 807 3512
Fax: 012 336 6608



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

Sent: 16 November 2020 09:59 PM

To: Rawayda.baulackey@dpw.gov.za; siphumelelo@siteplan.co.za; AviweNyakaza.denc@gmail.com; gLetimela@ncpg.gov.za; rtimothy@nbkb.org.za; Donovan.Fullard@wessa.co.za; Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; info@roshskor.com.na; Alexander.Maasdorp@roshskor.com.na; info@roshskor.com.na; ceo@ormdtc.com.na; led@ormdtc.com.na; gscholtz@ormdtc.com.na; aunie@omdis.co; mufetip@mawf.gov.na; mujetenga08026@itc.nl; lhipondoka@mrlgh.gov.na; lhipondoka@gmail.com; vmalango@chamberofmines.org.na; welcome@fenata.org; africuri@mweb.com.na; DiguN@namibiatourism.com.na; Lgreeff-Villet@peaceparks.org; bobby@groundwork.org.za; hanneline.smit-robinson@birdlife.org.za; succulent.karoo.research.station@kabelbw.de; skepsanbi@gmail.com; e.marinus2@sanbi.org.za; gill@azef.co.za; acpico@macau.ctm.net; fernandr@macau.ctm.net; info@alexkor.com; info@namwater.com.na; plessisn@namwater.com.na; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadmin@wessa.co.za; muna@iafrica.com

Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng

Subject: Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

An application will also be submitted to the Department of Water and Sanitation in terms of the South African National Water Act 36 of 1998 for a Water Use License.

The prospecting right application areas (PRAA) include:

Applications	Property	Size
PRAA 1 – (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11	987.98 Ha
PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

The draft Scoping Reports are available for public review from Friday 13 November until Monday 14 December 2020. Electronic versions of the reports and a comment sheet are available on the Naledzi website: <http://www.naledzi.co.za/public-documents-naledzi.php>.

Hard copies of the reports are available from the following public venues within the Richtersveld, Northern Cape, South Africa:

- Sanddrif, Alexander Bay, Lekkersing, Eksteenfontein and Kuboes in the Richtersveld
- SANPARKS Office, 1 Marshall Street in Sendelingsdrif, Richtersveld National Park

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
 Naledzi Environmental Consultants Pty Ltd
 Email: botham@naledzi.co.za
 Cell: 084 226 5584
www.naledzi.co.za

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Fw: Kaarte vir Samara Prospekterreg Aansoek op Oranje Rivier

Marissa Botha <botham@naledzi.co.za>

Wed 11/18/2020 4:07 PM

To: cjoperations2015@gmail.com <cjoperations2015@gmail.com>

 4 attachments (3 MB)

PRAA 1_Appendix 3_Location Map REGULATION 2(2) - 12664.pdf; PRAA 1_Appendix 4 Site Plan.pdf; PRAA 2_Appendix 3_Location Map REGULATION 2(2)[1] 12663.pdf; PRAA 2_Appendix 4 Site Plan.pdf;

Goeie dag Mr Gert Cloete,

Soos versoek, hierby aangeheg is liggingskaarte vir beide prospekterreg aansoek areas.

Groete

Marissa Botha

Naledzi Environmental Consultants Pty Ltd

Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za

RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Roets Wietsche <RoetsW@dws.gov.za>

Wed 11/18/2020 9:38 AM

To: Marissa Botha <botham@naledzi.co.za>

Cc: Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Ackerman Pieter <AckermanP@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Meulenbeld Paul <MeulenbeldP@dws.gov.za>; Khosa Tsunduka <Khosat@dws.gov.za>; Naidoo Bronwyn Roxanne <NaidooB@dws.gov.za>; Hlengani Alexia (UPN) <HlenganiA@dws.gov.za>

Please note that the regional office of DWS is the entry point for all information. Further note that these activities may require a water use authorisation. The location of the proposal may prejudice this application.

Kind regards

Wietsche Roets (PhD) Pr.Sci.Nat.

Specialist Scientist

Directorate: Water Abstraction and In-stream Use

Sub-Directorate: In-stream Water Use

185 Francis Baard Street, Sedibeng Bldg, Room 437A

P/Bag X313, PRETORIA, 0001

Tel +27(0)12 336 6510

Cell +27(0)82 604 7730

Email: RoetsW@dws.gov.za



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

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

Sent: 17 November 2020 09:15 PM

To: Roets Wietsche

Cc: Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; Meulenbeld Paul; Khosa Tsunduka; Naidoo Bronwyn Roxanne; Hlengani Alexia (UPN)

Subject: Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Good day Dr. Wietsche Roets;

Kindly note that we have couriered a hard copy of the Draft Scoping Reports to the Department of Water & Sanitation Offices in Pretoria. The reports are addressed to you. Please see the attached courier waybill and Draft Scoping Report cover letter addressed to you. The reports should be delivered by Friday, 20 November 2020 at the latest. Electronic versions of the reports and a comment sheet are available on the Naledzi website:

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

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www.naledzi.co.za

We would appreciate the department's comment on the applications by 14 December 2020. We have also sent a copy to the DWS Offices in Upington, Mrs. Alexia Hlengani.

Regards,



Marissa Botha

Naledzi Environmental Consultants Pty Ltd

1 Oudekraal Estate, 95 Hamerkop Street, Thabazimbi, 0387

Email: botham@naledzi.co.za
 Cell: 084 226 5584
www.naledzi.co.za

From: Roets Wietsche <RoetsW@dws.gov.za>
Sent: Tuesday, November 17, 2020 9:46 AM
To: Ackerman Pieter <AckermanP@dws.gov.za>; Marissa Botha <botham@naledzi.co.za>; Rawayda.baulackey@dpw.gov.za <Rawayda.baulackey@dpw.gov.za>; siphumelelo@siteplan.co.za <siphumelelo@siteplan.co.za>; AviweNyakaza.denc@gmail.com <AviweNyakaza.denc@gmail.com>; gLetimela@ncpg.gov.za <gLetimela@ncpg.gov.za>; rtimothy@nbkb.org.za <rtimothy@nbkb.org.za>; Donovan.Fullard@wessa.co.za <Donovan.Fullard@wessa.co.za>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; info@roshskor.com.na <info@roshskor.com.na>; Alexander.Maasdorp@roshskor.com.na <Alexander.Maasdorp@roshskor.com.na>; info@roshskor.com.na <info@roshskor.com.na>; ceo@ormdtc.com.na <ceo@ormdtc.com.na>; led@ormdtc.com.na <led@ormdtc.com.na>; gscholtz@ormdtc.com.na <gscholtz@ormdtc.com.na>; aunie@omdis.co <aunie@omdis.co>; mufetip@mawf.gov.na <mufetip@mawf.gov.na>; mujetenga08026@itc.nl <mujetenga08026@itc.nl>; lhipondoka@mrigh.gov.na <lhipondoka@mrigh.gov.na>; lhipondoka@gmail.com <lhipondoka@gmail.com>; vmalango@chamberofmines.org.na <vmalango@chamberofmines.org.na>; welcome@fenata.org <welcome@fenata.org>; africuri@mweb.com.na <africuri@mweb.com.na>; DiguN@namibiatourism.com.na <DiguN@namibiatourism.com.na>; Lgreeff-Villet@peaceparks.org <Lgreeff-Villet@peaceparks.org>; bobby@groundwork.org.za <bobby@groundwork.org.za>; hanneline.smit-robinson@birdlife.org.za <hanneline.smit-robinson@birdlife.org.za>; succulent.karoo.research.station@kabelbw.de <succulent.karoo.research.station@kabelbw.de>; skepsanbi@gmail.com <skepsanbi@gmail.com>; e.marinus2@sanbi.org.za <e.marinus2@sanbi.org.za>; gill@azef.co.za <gill@azef.co.za>; acpico@macau.ctm.net <acpico@macau.ctm.net>; fernandr@macau.ctm.net <fernandr@macau.ctm.net>; info@alexkor.com <info@alexkor.com>; info@namwater.com.na <info@namwater.com.na>; plessis@namwater.com.na <plessis@namwater.com.na>; bonnies@ewt.o0rg.za <bonnies@ewt.o0rg.za>; yolanf@ewt.org.za <yolanf@ewt.org.za>; bonnies@ewt.org.za <bonnies@ewt.org.za>; jnbadm@wessa.co.za <jnbadm@wessa.co.za>; muna@iafrica.com <muna@iafrica.com>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Meulenbeld Paul <MeulenbeldP@dws.gov.za>; Khosa Tsunduka <KhosaT@dws.gov.za>; Tonjeni Mzuvukile <TonjeniM@dws.gov.za>; Naidoo Bronwyn Roxanne <NaidooB@dws.gov.za>; Bila-Mupariwa Ntombizanele Mary <Bila-MupariwaN@dws.gov.za>
Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>
Subject: RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Agree.

Kind regards

Wietsche Roets (PhD) Pr.Sci.Nat.

Specialist Scientist

Directorate: Water Abstraction and In-stream Use

Sub-Directorate: In-stream Water Use

185 Francis Baard Street, Sedibeng Bldg, Room 437A
 P/Bag X313, PRETORIA, 0001
 Tel +27(0)12 336 6510
 Cell +27(0)82 604 7730
 Email: RoetsW@dws.gov.za



water & sanitation
 Department:
 Water and Sanitation
 REPUBLIC OF SOUTH AFRICA

From: Ackerman Pieter
Sent: 17 November 2020 09:01 AM
To: Marissa Botha; Rawayda.baulackey@dpw.gov.za; siphumelelo@siteplan.co.za; AviweNyakaza.denc@gmail.com; gLetimela@ncpg.gov.za; rtimothy@nbkb.org.za; Donovan.Fullard@wessa.co.za; Mulaudzi Nkhumbudzeni; Kuse Lumka; Mulaudzi Nkhumbudzeni; Kuse Lumka; info@roshskor.com.na; Alexander.Maasdorp@roshskor.com.na; info@roshskor.com.na; ceo@ormdtc.com.na; led@ormdtc.com.na; gscholtz@ormdtc.com.na; aunie@omdis.co; mufetip@mawf.gov.na; mujetenga08026@itc.nl; lhipondoka@mrigh.gov.na; lhipondoka@gmail.com; vmalango@chamberofmines.org.na; welcome@fenata.org; africuri@mweb.com.na; DiguN@namibiatourism.com.na; Lgreeff-Villet@peaceparks.org; bobby@groundwork.org.za; hanneline.smit-robinson@birdlife.org.za; succulent.karoo.research.station@kabelbw.de; skepsanbi@gmail.com; e.marinus2@sanbi.org.za; gill@azef.co.za; acpico@macau.ctm.net; fernandr@macau.ctm.net; info@alexkor.com; info@namwater.com.na; plessis@namwater.com.na; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadm@wessa.co.za; muna@iafrica.com; Mulaudzi Nkhumbudzeni; Kuse Lumka; Roets Wietsche; Meulenbeld Paul; Khosa Tsunduka; Tonjeni Mzuvukile; Naidoo Bronwyn Roxanne; Bila-Mupariwa Ntombizanele Mary
Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng
Subject: RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Hi Marissa

Thank you for the opportunity to comment as part of the EIA process and IWULA process.

Diamond mining and coal mining are inter alia not supported within National Parks so the one application within the Richtersveld National Park is not supported from our Section..

Regards

Pieter Ackerman (PrLArch)
 Chief Landscape Architect
 Department of Water and Sanitation (DWS), South Africa
 Sub Directorate Instream Water Use
 Tel: 012 336 8217
 Cell: 082 807 3512
 Fax: 012 336 6608



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

Sent: 16 November 2020 09:59 PM

To: Rawayda.baulackey@dpw.gov.za; siphumelelo@siteplan.co.za; AviweNyakaza.denc@gmail.com; gLetimela@ncpg.gov.za; rtimothy@nbkb.org.za; Donovan.Fullard@wessa.co.za; Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; Mulaudzi Nkhumbudzeni; Ackerman Pieter; Kuse Lumka; info@roshskor.com.na; Alexander.Maasdorp@roshskor.com.na; info@roshskor.com.na; ceo@ormdtc.com.na; led@ormdtc.com.na; gscholtz@ormdtc.com.na; aunie@omdis.co; mufetip@mawf.gov.na; mujetenga08026@itc.nl; lhipondoka@mrlgh.gov.na; lhipondoka@gmail.com; vmalango@chamberofmines.org.na; welcome@fenata.org; africuri@mweb.com.na; DiguN@nambiatourism.com.na; Lgreeff-Villet@peaceparks.org; bobby@groundwork.org.za; hanneline.smit-robinson@birdlife.org.za; succulent.karoo.research.station@kabelbw.de; skepsanbi@gmail.com; e.marinus2@sanbi.org.za; gill@azef.co.za; acpico@macau.ctm.net; fernandr@macau.ctm.net; info@alexkor.com; info@namwater.com.na; plessisn@namwater.com.na; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadmin@wessa.co.za; muna@iafrica.com

Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng

Subject: Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

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Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za

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RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Roets Wietsche <RoetsW@dws.gov.za>

Tue 11/17/2020 9:51 AM

To: Ackerman Pieter <AckermanP@dws.gov.za>; Marissa Botha <botham@naledzi.co.za>; Rawayda.baulackey@dpw.gov.za <Rawayda.baulackey@dpw.gov.za>; siphumelelo@siteplan.co.za <siphumelelo@siteplan.co.za>; AviweNyakaza.denc@gmail.com <AviweNyakaza.denc@gmail.com>; gLetimela@ncpg.gov.za <gLetimela@ncpg.gov.za>; rtimothy@nbkb.org.za <rtimothy@nbkb.org.za>; Donovan.Fullard@wessa.co.za <Donovan.Fullard@wessa.co.za>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; Mulaudzi Nkhumbudzeni <MulaudziN@dws.gov.za>; Kuse Lumka <KuseL@dws.gov.za>; info@roshskor.com.na <info@roshskor.com.na>; Alexander.Maasdorp@roshskor.com.na <Alexander.Maasdorp@roshskor.com.na>; info@roshskor.com.na <info@roshskor.com.na>; ceo@ormdtc.com.na <ceo@ormdtc.com.na>; led@ormdtc.com.na <led@ormdtc.com.na>; gscholtz@ormdtc.com.na <gscholtz@ormdtc.com.na>; aunie@omdis.co <aunie@omdis.co>; mufetip@mawf.gov.na <mufetip@mawf.gov.na>

Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>

Agree.

Kind regards

Wietsche Roets (PhD) Pr.Sci.Nat.

Specialist Scientist

Directorate: Water Abstraction and In-stream Use

Sub-Directorate: In-stream Water Use

185 Francis Baard Street, Sedibeng Bldg, Room 437A

P/Bag X313, PRETORIA, 0001

Tel +27(0)12 336 6510

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Email: RoetsW@dws.gov.za



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

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Sent: 17 November 2020 09:01 AM

To: Marissa Botha; Rawayda.baulackey@dpw.gov.za; siphumelelo@siteplan.co.za; AviweNyakaza.denc@gmail.com; gLetimela@ncpg.gov.za; rtimothy@nbkb.org.za; Donovan.Fullard@wessa.co.za; Mulaudzi Nkhumbudzeni; Kuse Lumka; Mulaudzi Nkhumbudzeni; Kuse Lumka; info@roshskor.com.na; Alexander.Maasdorp@roshskor.com.na; info@roshskor.com.na; ceo@ormdtc.com.na; led@ormdtc.com.na; gscholtz@ormdtc.com.na; aunie@omdis.co; mufetip@mawf.gov.na; mujetenga08026@itc.nl; lhpondoka@mrlgh.gov.na; lmhipondoka@gmail.com; vmalango@chamberofmines.org.na; welcome@fenata.org; africuri@mweb.com.na; DiguN@namibiaturism.com.na; Lgreff-Villet@peaceparks.org; bobby@groundwork.org.za; hanneline.smit-robinson@birdlife.org.za; succulent.karoo.research.station@kabelbw.de; skepsanbi@gmail.com; e.marinus2@sanbi.org.za; gill@azef.co.za; acpico@macau.ctm.net; fernandr@macau.ctm.net; info@alexkor.com; info@namwater.com.na; plessisn@namwater.com.na; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadm@wessa.co.za; muna@iafrica.com; Mulaudzi Nkhumbudzeni; Kuse Lumka; Roets Wietsche; Meulenbeld Paul; Khosa Tsunduka; Tonjeni Mzuvukile; Naidoo Bronwyn Roxanne; Bila-Mupariwa Ntombizanele Mary

Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng

Subject: RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

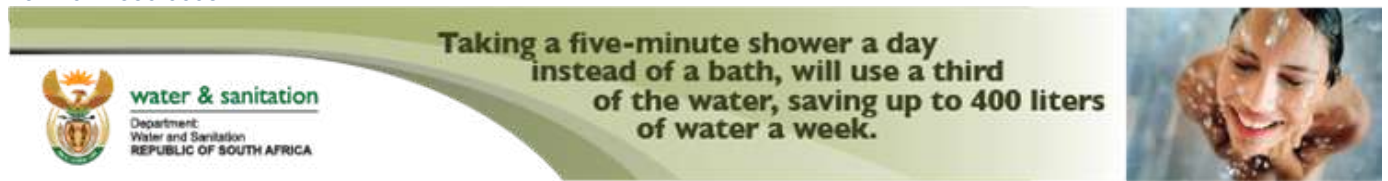
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Thank you for the opportunity to comment as part of the EIA process and IWULA process.

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Regards

Pieter Ackerman (PrLArch)
 Chief Landscape Architect
 Department of Water and Sanitation (DWS), South Africa
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 Tel: 012 336 8217
 Cell: 082 807 3512
 Fax: 012 336 6608



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Cc: Desmond Musetsho; Ndivhudzannyi Mofokeng

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	Farm No. 18	
--	-------------	--

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

The draft Scoping Reports are available for public review from Friday 13 November until Monday 14 December 2020. Electronic versions of the reports and a comment sheet are available on the Naledzi website: <http://www.naledzi.co.za/public-documents-naledzi.php>.

Hard copies of the reports are available from the following public venues within the Richtersveld, Northern Cape, South Africa:

- Sanddrif, Alexander Bay, Lekkersing, Eksteenfontein and Kuboes in the Richtersveld
- SANPARKS Office, 1 Marshall Street in Sendelingsdrif, Richtersveld National Park

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za

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Public Meeting.EIA process for Samara Mining Prospecting Right Application

Innocent Hinana <innocent@richtersveld.gov.za>

Mon 11/23/2020 8:23 AM

To: Marissa Botha <botham@naledzi.co.za>

Richtersveld Municipality would like to register as an interested party.



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

Northern Cape Region
Lower Orange Water Management Area
Private Bag X5912, Upington, 8800
Tel: (054) 338-5800, Fax: (054) 334-0205, www.dwa.gov.za

F 054 334 0205

A.A Hlengani

E hlengania@dws.gov.za

054 338 5800

By e-mail: botham@naledzi.co.za

Samara Mining (Pty) Ltd,
P O Box 11124
Hadison Park
Kimberley
8306

Attention: Marissa Botha

RE: THE PROPOSED PROSPECTING RIGHT APPLICATION FOR THE PROSPECTING OF DIAMONDS (ALLUVIAL) ON THE LEFT BANK OF THE ORANGE RIVER BOUNDARY TO PORTION OF REMAINDER OF FARM RICHTERSVELD NO. 11, RICHTERSVELD, NAMAQUALAND DISTRICT, NORTHERN CAPE PROVINCE.

Reference is made to the above-mentioned report with the cover letter dated 18 November 2020, with Reference number **NC 30/5/1/1/2/1 (12664) PR.**

The Department of Water and Sanitation (DWS) has assessed the above-mentioned application and wish to comment as follows:

1. It is stated that the proposed operation will be more than 100 meters from open watercourse or estuary. It must be noted that, in terms of Government Notice No.704, Operational Guideline No.M6.1 Regulation 4:Restriction on locality, subsection(b) it is stated that: "No person in control of a mine or activity may-(b) except in relation to a matter contemplated in regulation 10,carry on any underground or opencast mining, prospecting or any other operation or activity under or within the 1:50 year flood-line or within a horizontal distance of 100 meters from any watercourse or estuary, whichever is the greatest", therefore the applicant is required to specify the exact distance of the proposed operation from the water resource to ensure compliance with the stated regulation.
2. Therefore, any other water use activities as outlined in section 21 of the National Water Act, 1998 (Act 36 of 1998) associated with the proposed project that are not permissible as indicated on paragraph 1 above shall have to be authorised by DWS prior to such water use activities taking place.



NATIONAL DEVELOPMENT PLAN
Our future - make it work

3. All relevant sections and regulations of the National Water Act, 1998 (Act 36 of 1998) regarding water use must be adhered to.
4. No pollution of surface water or ground water resources may occur due to any activity on the property.
5. Any oil or diesel (including any petroleum products) spillage on site, must be properly managed to prevent any contamination of the water resource. An emergency response protocol must be developed to ensure that such spillages are immediately attended to and that the contaminated site properly rehabilitated and that protocol as indicated in Section 19 of the National Water Act, 1998 (Act 36 of 1998) is observed.
6. The applicant shall note that all domestic waste generated on site and any waste associated with the operation be disposed of at licensed landfill site. A signed copy of service agreement from the municipality shall be submitted to this Department to demonstrate that indeed provision will be made to render such services.
7. It is stated that temporary diversion or re-alignment of the river will be constructed to gain access to alluvial material for excavation. Further indicated that a channel will be excavated from current river flow on the on the dry side of the river bed. The applicant must ensure that sandbags barriers are used for temporary diversion and it is to remove when the prospecting is finished.
8. It is indicated that chemical toilets or ablution facilities will be established for the employees. The Department supports the use of chemical toilets considering the lifetime of the project. Furthermore, the chemical toilets shall be used and be managed accordingly to applicable legislation.
9. The Draft Scoping states that water for the processing will be abstracted from the Orange River. The vacuum and filter system will remove the dirt, filter the water to drinkable standard and either release it back into the river or supply communities with water by pumping it into municipal reservoirs is still to be confirmed. Please note that drinkable water standards get revised from time to time and must comply to potable standards (SANS 241:2011) depending on the final use.
10. Further noted that the abstraction and filtration of sediment-laden water from excavations to be used in the plant with release of filtered water back into the river channel downstream of the workings may change the water back into the river channel downstream of working may change the water quality. Any water discharged into the river must comply to SANS 241 drinking standards and enhance the quality therein.
11. Soil erosion on site must be prevented at all times during prospecting. Extra precautions must be taken in areas where soils are deemed as highly erodible. If soil erosion cannot be prevented, it must be minimised.
12. The applicant must furnish the Department with the rehabilitation plan for the affected areas.
13. Stock piling of any material should not be within 100m from the watercourse owing to high sedimentation.
14. **Wetland:** the applicant must ensure not prospecting within the wetland. However, the following should be considered; please note that according to this Department's guideline entitled "*A practical field procedure for identification and delineation of wetlands and riparian areas.*" (DWAF, 2005). There must be 500-meter buffer from the edge of the temporary wet zone of the wetland edge of any structural development. A functional assessment of the wetland must be conducted, should the developer not be in agreement with the 500m buffer.

15. The applicant shall note that according to section 19 (1) of the National Water Act, 1998 (Act 36 of 1998), it is stated that, *"an owner of land , a person in control of land or a person who occupies or uses the land on which (a) any activity or process is or was performed or undertaken; or (b) any other situation exists, which causes, has caused or is likely to cause pollution of a water resource, must take all reasonable measures to prevent any such pollution from occurring, continuing or recurring"*. Any pollution incident(s) originating from this mining operation shall be reported to the Regional Head of the DWS within 24 hours.

Please feel free to contact this department, should there be any enquiries.

Yours sincerely,

PP 

.....
PROVINCIAL HEAD: NORTHERN CAPE OPERATIONS

DATE: 20/11/2020

Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Brent Whittington <brent.whittington@sanparks.org>

Fri 12/4/2020 7:26 AM

To: Marissa Botha <botham@naledzi.co.za>

Cc: Lucius Moolman <lucius.moolman@sanparks.org>

 1 attachments (268 KB)

IAP SAMARA RNP December 2020 Signed.pdf;

<

Dear Marissa,

Thank you for your correspondence. As briefly discussed telephonically, please find attached letter or acknowledgment as a registered IAP. Details pertaining to the application will be addressed on a higher level through the correct channels with SANParks.

Regards,

Brent Whittington

Park Manager

/Ai/Ais-Richtersveld Transfrontier Park (RSA side)

PO Box 406, Alexander Baai, 8290

Tel : 027 8311506

Cell : 071 170 2824

brent.whittington@sanparks.org

www.sanparks.org

Vision statement: 'A sustainable National Parks System Connecting Society'

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

Sent: 14 November 2020 07:54

To: rgevcpa@gmail.com; ruwayda.baulakay@dpw.gov.za; Brent Whittington <brent.whittington@sanparks.org>; Meghan Diergaardt <Meghan.Diergaardt@sanparks.org>; Briston Adams <Briston.Adams@sanparks.org>; theodor.boshoff@gmail.com; johan@lor.co.za; jamie@lor.co.za; marina@lor.co.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; sanddrift@richtersveld.gov.za; eksteenfontein@richtersveld.gov.za; kuboos@richtersveld.gov.za; chris@namakwa-dm.gov.za; jloubser@namakwa-dm.gov.za; info@namakwa-dm.gov.za; Mangalane.dutoit@drdlr.gov.za; HlenganiA@dws.gov.za; CloeteS@dws.gov.za; Sekwailak@dws.gov.za; mulaudzin@dws.gov.za; peter.denc87@gmail.com; sdelafonteine@gmail.com; darrenengelbrecht@gmail.com; rtimothy@nbkb.org.za; Karl Naude <knaude@environment.gov.za>; Tnethononda@environment.gov.za; smunzhedzi@environment.gov.za; mulaudzin@dws.gov.za; rtimothy@nbkb.org.za; erica@nhc-nam.org; helena@nhc-nam.org; erodrigues@mme.gov.za; eshivolo@mme.gov.za; grashatsh@yahoo.com; salomon@nhc-nam.org; 264811245698@mtcmobile.com.na; ceo@n-c-e.org; admin@n-c-e.org; gabriela@mail.na; gabriela@mail.na; sisavva@venus.com.na; tnshaanika@ncci.org.na; wbcci@iway.na; cetn@iafrica.com.na; earthl@iway.na; Elinor@iway.na; opmystoep@iway.na; shepherds@iway.co.za; John.pallet@saiea.com;

ceo@boegoebergwater.co.za; info@boegoebergwater.co.za; alvina@lantic.net; ceokwgv@isat.co.za; rita@nelenvennote.co.za; kobus@nelenvennote.co.za; lizellewater@yahoo.com; hanke@oranjeriet.co.za; neverstop@lantic.net; rsbrink@telkomsa.net; loxton@itssnet.co.za; gannabos@tomail.co.za; andre@oberholzerfarms.co.za; awievwyk@telkomsa.net; jjh@lantic.net; louiswater@vodamail.co.za; info@kalahariwater.co.za; dirk@kalahariwater.co.za; wjhanekom@lantic.net; kleinbegin@lantic.net; soetwater@lantic.net; chamberlainstanley@gmail.com; bmvanzyl@telkomsa.net; gerhardhleroux@gmail.com; nckarate@hotmail.co.za; cp@live.co.za; peu@rekopane-estates.co.za; johannita@carpediemfarms.co.za; hanlie@dutoitvdheever.co.za; uptbesproei@cybersmart.co.za; waterowerheid@gmail.com; smarttsin@gmail.com; chrisf@namakwa-dm.gov.za; tedbezuidenhout@khaima.gov.za; Municipal.Manager@namakhoi.gov.za; re-annb@alexkor.co.za; davidb@alexkor.co.za; JoshuaC@TRANSHEX.co.za; Frans Van Rooyen <frans.vanrooyen@sanparks.org>; lenka.thamae@orasecom.org; nngcaba@environment.gov.za; stanleyt@environment.gov.za; info.ncwf@gmail.com; ramolopp@gmail.com
Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>
Subject: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa
Importance: High

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

An application will also be submitted to the Department of Water and Sanitation in terms of the South African National Water Act 36 of 1998 for a Water Use License.

The prospecting right application areas (PRAA) include:

Applications	Property	Size
PRAA 1 – (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11	987.98 Ha
PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za

 [33% discount to new online reservations for accommodation and camping at a selection of national parks, for an early December holiday.](#)

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the denc

Department:
Environment & Nature Conservation
NORTHERN CAPE PROVINCE
REPUBLIC OF SOUTH AFRICA

SASKO Building
90 Long Street
Private Bag X6102
Kimberley
8300

Tel. 053-8077300
Fax: 053-8077328

Enquiries : A. Nyakaza
Dipatliso :
Imibuzo :

Navrae :

Reference : NC30/5/1/1/2/12663 PR
Tshupelo :
Isalathiso : NC30/1/1/2/12664 PR

Date :
Leshupelo :
Umhla : 12 December 2020
Datum :

ATTENTION: Ms Marissa Botha

Email: botham@naledzi.co.za

Dear Madam

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE SAMA MINING (PTY) LTD APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING WITH BULK SAMPLING, RICHTERSVELD, NAMAQUALAND DISTRICT, NORTHERN CAPE.

APPLICANT: SAMA MINING (PTY)

This Department has evaluated the application for the above-mentioned proposed operation and has the following comments:

It is noted that a Biodiversity Scoping Report has been compiled to screen the potential impact of the prospecting activities on fauna, flora and avifauna including potential presence of possible threatened or protected species and including list of species potentially present at the focus area. The following comments are to be considered and/or made part of the full Biodiversity Impact Assessment during the EIA Phase:

- A proper faunal and floral species list must be compiled for the sites in question as all indigenous species are protected under the Northern Cape Nature Conservation Act, Act 9 of 2009. Flora and fauna classification must also include status according to application legislation.
- No indigenous faunal species may be removed from the site without the necessary permits from Department of Environment and Nature Conservation (DENC). This includes the removal of bird nests, especially of raptor species, and no animals (including snakes) may be hunted (poached), trapped, injured or removed (transported) in any way without the necessary permits (not during the construction phase or thereafter).

- Permits must be applied for from the DENC for any indigenous vegetation which is protected under the Northern Cape Nature Conservation Act; or the Department of Environment, Forestry and Fisheries for tree species which are protected under this act.

GENERAL COMMENTS:

- Stringent erosion control practices must be developed and implemented and all areas susceptible to erosion must be protected.
- The mine and all its operations must be informed by the environmental sensitivity mapping in conjunction with conservation and planning tools.

SENSITIVITY MAP

Provide a map at an appropriate scale which superimposes the mining activities and its associated structures and infrastructure in relation to the identified environmental sensitivities and indicate any areas that should be avoided and proposed buffer zones in relation to the mitigation measures. The map must also be able to determine mitigation with regards to conservation areas that overlap with the mine.

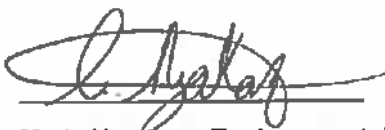
LISTED AND SPECIFIED ACTIVITIES

The application for authorisation was submitted to the DMR, A scoping report has been compiled. The triggered listed activities have been specified in Table 2 (for both PRAA 1-PRAA2). According to page 12 which makes specific reference to the following activity"

Activity 14 (GNR 327) Listing Notice 1-the diesel storage facility capacity has not been confirmed, a clear confirmation of combined capacity of the storage facility needs to be made.

This Department reserves a right to revise/withdraw this comment and to request further information from the applicant should any other information that contracts the above qualification come to light.

Please do not hesitate to call me on 027718 8800/060 991 4817 if you need any further information.



Mr A. Nyakaza: Environmental Officer

aviwenyakaza.denc@gmail.com

**COMMENTS ON THE DRAFT SCOPING REPORT FOR THE SAMA MINING (PTY) LTD
APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING WITH BULK SAMPLING,
RICHTERSVELD, NAMAQUALAND DISTRICT, NORTHERN CAPE**

aviwe nyakaza <aviwenyakaza.denc@gmail.com>

Mon 12/7/2020 9:48 AM

To: Marissa Botha <botham@naledzi.co.za>

 1 attachments (66 KB)

COMMENTS ON THE DRAFT SCOPING REPORT FOR THE SAMA MINING (PTY) LTD APPLICATION FOR ALLUVIAL DIAMOND PROSPECTING.pdf;

Dear Ms Marissa Botha

Please kindly receive the attached document, as pertaining to the above mentioned Project.

We believe you will find this in order

Best regards

A Nyakaza : **Environmental Officer**

Impact Management Unit

Environmental Quality Management

Department of Environment and Nature Conservation

Northern Cape Province

c/o Voortrekker and Magasyn street

Private Bag X16, Springbok, 8240 Northern Cape Province, South Africa

Extension: 027 718 8814

Cell: 060 991 4817

Re: Samara mining EIA & WULA

Marissa Botha <botham@naledzi.co.za>

Mon 12/7/2020 7:33 PM

To: Willem Louw <Willem.Louw@sanparks.org>**Cc:** 'Thivhulawi Nethononda' <Tnethononda@environment.gov.za>

Good evening Willem,

We herewith confirm receipt of your registration. You have been registered on the project I&AP Database.

Regards and thank you,

Marissa Botha**Naledzi Environmental Consultants Pty Ltd**

160 Marshall Street, Polokwane, 0699

Email: botham@naledzi.co.za

Cell: 084 226 5584

Tel: 015 296 3988

www.naledzi.co.za

From: Willem Louw <Willem.Louw@sanparks.org>**Sent:** Monday, December 7, 2020 3:55 PM**To:** Marissa Botha <botham@naledzi.co.za>**Cc:** 'Thivhulawi Nethononda' <Tnethononda@environment.gov.za>**Subject:** Samara mining EIA & WULA

<

Dear Marissa,

RE: Samara EIA & WUL applications: DMR Ref NCS 30/5/1/1/2/1 (12664) NCS 30/5/1/1/2/1 (12663) PR

Mr Nethononda from DEFFE forwarded abovementioned applications to me.

I would like to register as an I&AP. Kindly include me in dissemination of documents and discussions with the Authorities and SANParks.

Kind regards

Willem J Louw

Senior Manager: Park Planning & Development

SANParks Technical Office,

IPIC Centre, Soneike

KUILSRIVER

Tel 021 900-9063

Cell 083 640 5298

Willem.louw@sanparks.org



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Samara mining EIA & WULA

Willem Louw <Willem.Louw@sanparks.org>

Mon 12/7/2020 3:56 PM

To: Marissa Botha <botham@naledzi.co.za>

Cc: 'Thivhulawi Nethononda' <Tnethononda@environment.gov.za>

<

Dear Marissa,


RE: Samara EIA & WUL applications: DMR Ref NCS 30/5/1/1/2/1 (12664) NCS 30/5/1/1/2/1 (12663) PR

Mr Nethononda from DEFFE forwarded abovementioned applications to me.

I would like to register as an I&AP. Kindly include me in dissemination of documents and discussions with the Authorities and SANParks.

Kind regards

Willem J Louw
Senior Manager: Park Planning & Development
SANParks Technical Office,
IPIC Centre, Soneike
KUILSRIVER
Tel 021 900-9063
Cell 083 640 5298
Willem.louw@sanparks.org

 [33% discount to new online reservations for accommodation and camping at a selection of national parks, for an early December holiday.](#)

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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

Ek Willamina Bantam verwerp die aansoek van SAMARA om die volgende redes:

Ek het geen Vooraf inligting ontvang nie en kan nie toestemming verleen nie,

EK IS 'n GRONDEIENAAR en HET GEEN VOORAF INLIGTING GEKRY NIE, EK KAN GEEN KOMMENTAAR LEWER SONDER VOORAF GOEDKEURING N

- EK HOOR hulle gaan in die rivier myn:
Hoe gaan hulle daar kom?- wat van bedreigde plante?
Waar gaan hulle paaie maak?
Die rivier is geormerk vir Besproeiing, nie vir Myne
Die wet noem GEEN myne in die wereld erfenis gebied nie
My voorouers se grafte is ooral langs die Oranjerivier.

DIT IS HEILIGE GROND VIR DIE NAMA GRONDEIENAAR VAN DIE RICHTERSVELD
Daar is 'n Grondeis teen TransheX
Die konsultant het geen van bogenoemde redes in aanmerking geneem nie

EK WILLAMINA BANTAM ,KOKKEWIET LAAN 4 , SANDDRFT IS 'n NAMA VAN DIE RICHTERSVELD EN IS DIE WETTIGE GROND EIENAAR VAN DIE RICHTERSVELD, ALVORENS ENIGE MYNAANSOEK SLAAG MOET ONS DIE NAMAS TOESTEMMING GEE VIR SO "n BESLUIT.

Willamina Bantam met id nr 6312290851081

SANDDRIFT GEMEENSAP- SAMARA KOMMENTAAR				
PRESENSIELYS - 14 DESEMBER 2020				
	NAAM EN VAN	GEBORTE DATUM	ERF NR	HANTEKENEING
1	Katherina Cloete	82.07.03	ERF 131	K. Cloete
2	Anna G. Kotze	20-03-64	ERF. 111	AG Kotze
3	Johannes Kotze	31-12-61	ERF. 111	JKotze
4	Jody Ann Cloete	29-05-1997	Buiteperseel	J. Cloete
5	MARIA JOSEPH	27-07-1981	ERF 129	M. JOSEPH
6	Jacob JOSEPH	05-05-1949	ERF 129	J. JOSEPH
7	Frieda Bok	06-11-1950	ERF 103	F. Bok
8	Niklaas Bok	13-08-1950	" " "	N. Bok
9	Johannes Cloet	16.01.1963	61	JKloet
10	Piet Cloete	25-08-1964	154	P. Cloete
11	Katriena Cloete	20-12-67	137	K. Cloete
12	Margrietha Steffel	19-2-46	154	M. Steffel
13	Gerhardus Cloete	7-6-71	131	G. Cloete
14	Catherine Pooi	27/07/1985	ERF 177	C. Pooi
15	Abraham Cloete	70-03-23	ERF 31	A. Cloete
16	ROBERT CLOETE	17.11.1963	ERF 114	R. Cloete
17	Josephine Joseph	8405220217080	ERF 92	J. Joseph
18	ELSABÉ DEKLERK	8512140108081	ERF 115	E. DEKLERK

Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Brent Whittington <brent.whittington@sanparks.org>

Tue 12/15/2020 12:20 PM

To: Marissa Botha <botham@naledzi.co.za>

 2 attachments (3 MB)

Recommendations_LOR Diamond Mining_DScoopingReport_PC_ES20201106.pdf; New plant records for Richtersveld National Park PvW20201106.pdf;

Good afternoon Marissa,

Thank you for yesterday's discussion, albeit heated at times, I sincerely hope that the applicants have seen the importance of this area and the concerns and threats that will have irreparable consequences to the environment.

Please see below comments in addition for your consideration

It is important to note:

NEMPAA:

- * Please note that amongst other legislation, the entire Section 50 of NEMPAA dealing with Commercial and community activities in national parks, nature reserves, and world heritage sites will be relevant and applicable for this proposal.
- * In terms of NEMPAA Section 50 (5) and its regulations, no development or construction may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority.
- * In this case the management authority for the Richtersveld National Park is SANParks with its head office in Groenkloof, Pretoria.

Buffer zone:

The proposed activity falls within the approved expansion footprint and buffer area of the RNP, as per the Richtersveld National Park Management Plan for the period 2018-2028. A Biodiversity Policy and Strategy for South Africa: A Strategy on Buffer Zones for National Parks was gazetted in 2012 (Government Gazette, 08 Feb 2012, No. 35020, Notice no. 106 of 2012). The purpose of a national park buffer zone is to protect the purpose and values of the national park as defined in the management plan.

In addition to the proposed being in the RNP as well as in its footprint, the proposed development occurs in a critical biodiversity area as per the Northern Cape Biodiversity Plan of 2016. Critical Biodiversity Areas (CBAS) are terrestrial and aquatic features in the landscape that are critical for conserving biodiversity and maintaining ecosystem functioning. The management objective, as per the Northern Cape Biodiversity Plan, is to maintain these CBA areas in a natural or near natural state. Developing in these areas are to be avoided as far as possible.

The Gariep / Oranje River is threatened and that is highlighted in DENC biodiversity plan.

Rare and endangered species are also being threatened and for some of the plant species that might be our last population of that specific plant species, since the habitat of these plant species will be destroyed by the activity proposed. See the report from DENC with Potjiespram application – which is relevant to this application. **“The conservation of this terraces are critical to the protection and conservation of numerous endemic plant species occurring on these terraces in South Africa”.** Please also see attached report of Pieter van Wyk et al.

The RNP is a contractual Park with the Richtersveld community. Included in the agreement with the Richtersveld community is that traditional, nomadic live-stock farming is to continue and the **cultural heritage of the Richtersveld community preserved and conserved**. The lack of consultation with the community and not addressing the cultural heritage are of a great concern.

I will send additional information on as and when I receive it for the inclusion in the reporting structures.

Regards,

Brent Whittington

Park Manager

/Ai/Ais-Richtersveld Transfrontier Park (RSA side)

PO Box 406, Alexander Baai, 8290

Tel : 027 8311506

Cell : 071 170 2824

brent.whittington@sanparks.org

www.sanparks.org

Vision statement: 'A sustainable National Parks System Connecting Society'

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

Sent: 14 November 2020 07:54

To: rgevcpa@gmail.com; ruwayda.baulakay@dpw.gov.za; Brent Whittington <brent.whittington@sanparks.org>; Meghan Diergaardt <[Meghan.Diergaardt@sanparks.org](mailto: Meghan.Diergaardt@sanparks.org)>; Briston Adams <Briston.Adams@sanparks.org>; theodor.boshoff@gmail.com; johan@lor.co.za; jamie@lor.co.za; marina@lor.co.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; annabock2019@gmail.com; willielinks@vodamail.co.za; Sydney@richtersveld.gov.za; francois@richtersveld.gov.za; ivan@richtersveld.gov.za; sanddrift@richtersveld.gov.za; eksteenfontein@richtersveld.gov.za; kuboes@richtersveld.gov.za; chris@namakwa-dm.gov.za; jloubser@namakwa-dm.gov.za; info@namakwa-dm.gov.za; Mangalane.dutoit@drdlr.gov.za; HlenganiA@dws.gov.za; CloeteS@dws.gov.za; Sekwailak@dws.gov.za; mulaudzin@dws.gov.za; peter.denc87@gmail.com; sdelafonteine@gmail.com; darrenengelbrecht@gmail.com; rtimothy@nbkb.org.za; Karl Naude <knaude@environment.gov.za>; Tnethononda@environment.gov.za; smunzhedzi@environment.gov.za; mulaudzin@dws.gov.za; rtimothy@nbkb.org.za; erica@nhc-nam.org; helena@nhc-nam.org; erodrigues@mme.gov.za; eshivolo@mme.gov.za; grashatsh@yahoo.com; salomon@nhc-nam.org; 264811245698@mtcmobile.com; ceo@n-c-e.org; admin@n-c-e.org; gabriela@mail.na; gabriela@mail.na; sisavva@venus.com.na; tnshaanika@ncci.org.na; wbcc@iway.na; cetn@iafrica.com.na; earthl@iway.na; Elinor@iway.na; opmystoep@iway.na; shepherds@iway.co.za; John.pallet@saiea.com; ceo@boegoebergwater.co.za; info@boegoebergwater.co.za; alvina@lantic.net; ceokwgv@isat.co.za; rita@nelenvnote.co.za; kobus@nelenvnote.co.za; lizellewater@yahoo.com; hanke@oranjeriet.co.za; neverstop@lantic.net; rsbrink@telkomsa.net; loxt@itssnet.co.za; gannabos@tomail.co.za; andre@oberholzerfarms.co.za; awievwyk@telkomsa.net; jjh@lantic.net; louiswater@vodamail.co.za; info@kalahariwater.co.za; dirk@kalahariwater.co.za; wjhanekom@lantic.net; kleinbegin@lantic.net; soetwater@lantic.net; chamberlainstanley@gmail.com; bmvanzyl@telkomsa.net; gerhardhleroux@gmail.com; nckarate@hotmail.co.za; cp@live.co.za; peu@rekopane-estates.co.za; johannita@carpediemfarms.co.za; hanlie@dutoitvdheever.co.za; uptbesproei@cybersmart.co.za; waterowerheid@gmail.com;

smarttsin@gmail.com; chrisf@namakwa-dm.gov.za; tedbezuidenhout@khaima.gov.za;
Municipal.Manager@namakhoi.gov.za; re-annb@alexkor.co.za; davidb@alexkor.co.za; JoshuaC@TRANSHEX.co.za;
 Frans Van Rooyen <frans.vanrooyen@sanparks.org>; lenka.thamae@orasecom.org;
nggcaba@environment.gov.za; stanleyt@environment.gov.za; info.ncwf@gmail.com; ramollopp@gmail.com
Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>
Subject: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa
Importance: High

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

An application will also be submitted to the Department of Water and Sanitation in terms of the South African National Water Act 36 of 1998 for a Water Use License.

The prospecting right application areas (PRAA) include:

Applications	Property	Size
PRAA 1 – (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11	987.98 Ha
PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
Email: botham@naledzi.co.za
Cell: 084 226 5584
www.naledzi.co.za

 [More information on Covid-19](#)

Disclaimer: 1) Confidentiality: This email communication and any attachments sent from brent.whittington@sanparks.org to botham@naledzi.co.za on 2020-12-15 12:20:27 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 botham@naledzi.co.za please notify brent.whittington@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: Fw: Notice EIA Process & Water Use License Application & availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

David Morris <dmorriskby@gmail.com>

Tue 12/15/2020 2:53 PM

To: Marissa Botha <botham@naledzi.co.za>

Cc: Sunet <sunet@museumsonc.co.za>; enquiries <enquiries@museumsonc.co.za>; ratha.timothy <ratha.timothy@gmail.com>; JSinthumule <jsinthumule@ncpg.gov.za>; jsinthumule <jsinthumule@gmail.com>

 1 attachments (207 KB)

COMMENT ON HERITAGE SCOPING REPORT FOR Two Prospecting Right Applications on left bank of Lower Orange River.pdf;

Dear Marissa,

Thank you for inviting me to the very interesting zoom meeting yesterday on this matter. It seems there are some major issues with this application which all but ignores the World Heritage status of the region where, in terms of heritage, the river and its banks would always have been key to human life in the area. Known heritage resources occur particularly in that zone. It does not seem conceivable that any mining could be considered there.

I attach a response from Archaeology at the McGregor Museum.

The non-consultation with Northern Cape heritage authorities (NCHRA in particular - who should have been in the Zoom meeting) is a critical oversight.

All the best

David

Dr David Morris

Head of Archaeology, McGregor Museum &

Extraordinary Professor, School of Humanities, Sol Plaatje University, Kimberley,

P.O. Box 316, Kimberley, 8300, South Africa.

Mobile +27-(0)82-2224777; landline +27-(0)53-8392707 or 053-8328355 (h)



Sa ||a !aĩsi 'uĩsi - Northern Cape Provincial Motto

We go to a better life - from Elsie Vaalbooi, N|uu language

On Wed, Dec 9, 2020 at 4:54 PM Marissa Botha <botham@naledzi.co.za> wrote:

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

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As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

Electronic versions of the reports and a comment sheet are available on the Naledzi website: <http://www.naledzi.co.za/public-documents-naledzi.php>.

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Naledzi is a 100% black owned and managed company with a Level 1 BEE rating. [READ MORE](#)

www.naledzi.co.za

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
Naledzi Environmental Consultants Pty Ltd
 Email: botham@naledzi.co.za

Cell: 084 226 5584

www.naledzi.co.za

COMMENT SHEET FOR DRAFT SCOPING REPORTS

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA) APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT OF THE NORTHERN CAPE PROVINCE

Prospecting Right Application Area (PRAA)	DMR Reference Number	Property
PRAA 1	NCS 30/5/1/1/2/1 (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11
PRAA 2	NCS 30/5/1/1/2/1 (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18

EAP CONTACT INFORMATION: Naledzi Environmental Consultants Pty Ltd
 Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700
 160 Marshall Street, Polokwane
 Tel: 015 296 3988 Fax: 015 296 4021
 Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond)
 Email: botham@naledzi.co.za or dmusetsho@naledzi.co.za

TITLE (Prof/Mr/Mrs)	<i>Mr</i>	FIRST NAME	<i>Jemini</i>	
SURNAME	<i>Farmer</i>			
CAPACITY (eg. Director/Secretary)				
ORGINASATION				
POSTAL ADDRESS	<i>P.O. Box 37, Eksteenfontein</i>	POSTAL CODE	<i>8284</i>	<i>Bergstraat 57, Eksteenfontein</i>
TEL NO:		CELL NO:	<i>0795254319</i>	
FAX NO:		EMAIL ADDRESS:		
APPLICATION AREA TO WHICH YOUR COMMENT RELATES: (Please tick box)	<input type="checkbox"/> PR 12664 – PRAA 1	<input type="checkbox"/> PR 12663 – PRAA 2	<input type="checkbox"/> ALL:	

Ons het nie die volgende dokumente gekry nie

- Scoping repute vir verskillende myn areas nie
- Visuele scoping report
- Grondwater verslae en report
- Mynplanne
- En al die aanhangsels wat saam met die aansoek gaan

Verder eis ons :

DIE VOLLE AANSOEK + DIE VOLLE MYNAANSOEK MET NAME ADRESSE VAN AANSOEKERS NA ONS GESTUUR MOET WORD : NS , VOLGENS WET IS ONS GERGTIG DAAROP - SIEN DIE SAAK NO : 9628/2015], TUSSEN Duduzile Baleni & Others v Regional Manger: Eastern Cape Department of Mineral Resources & Others . ALLE INLIGTING MOET IN AFRIKAANS WEES EN ONS EIS HIERDIE INLIGTING SODAT ONS INGELIGTE BESLUTE KAN MAAK. ONS IS GERECHTIG DAAROP , ONS KAN NIE BESLUTE NEEM SONDER GOEIE INLIGTING NIE ONS VERSOEK DAT HIERDIE INLIGTING VOOR SLUITINGS DATUM VAN AANSOEK AAN ONS GESTUUR MOET WORD , 14 DESEMBER 2020.

Ek en die volgende gemeenskaplede verwerp die aansoek van SAMARA om die volgende redes:

Ons het geen Vooraf inligting ontvang nie en kan nie toestemming verleen nie,

ONS DIE GRONDEIENAARS HET GEEN VOORAF INLIGTING GEKRY NIE, ONS KAN GEEN KOMMENTAAR LEWER SONDER VOORAF GOEDKEURING NIE ;

Die wet noem die grondeienaars, moet Vooraf inligting verkry om 'n besluit te maak te maak , nie Konsultering nie.

- Daar was geen konsultasie met Richtersvelders – wat die wettige grondeienaars is .
- Vergadering uitgestel, gemeenskap dra geen kennis van die SAMARA aansoek nie
- Ons het geen dokumentasie ontvang nie, ons is nie ingelig – die konsultant het slegs boodskappe gestuur en kennisgewings laat aanbring.
- Ons HOOR hulle gaan in die rivier myn:

Hoe gaan hulle daar kom? - wat van bedreigde plante?

Waar gaan hulle paaie maak?

Die rivier is geormerk vir Besproeiing, nie vir Myne nie

Die noem wet GEEN nuwe myne mag toegelaat word in die Park nie

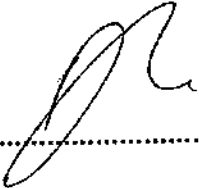
Die wet noem GEEN myne in die wereld erfenis gebied nie

Ons voorouers se grafte is ooral langs die rivier.

DIE VOLLE GEOOGDE MYN HUUR AREA IS HEILIGE GROND VIR DIE NAMA GRONDEIENAAR VAN DIE RICHTERSVELD

ONS HET VOLLE MINERAAL EN GRONDEIS TEEN TRANSHEX MYNHUUR AREA IN DIE GRONDEISE HOF

Die konsultant het geen van bogenoemde redes in aanmerking geneem nie
DIE NAMA VAN DIE RICHTERSVELD IS DIE WETTIGE EIENAAR VAN DIE
RICHTERSVELD ALVORENS ENIGE MYNAANSOEK SLAAG MOET ONS
TOESTEMMING GEE.



.....

Dimitri Farmer (kontaknr 0795954319)

Straat adres, Eksteenfontein

COMMENT SHEET FOR DRAFT SCOPING REPORTS

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA)
APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS
WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE
RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT
OF THE NORTHERN CAPE PROVINCE

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Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700
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Tel: 015 296 3988 Fax: 015 296 4021
Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond)
Email: botham@naledzi.co.za or dmusetsho@naledzi.co.za

TITLE (Prof/Mr/Mrs)	Mr	FIRST NAME	GERT
SURNAME	CLOETE		
CAPACITY (eg. Director/Secretary)			
ORGANISATION			
POSTAL ADDRESS	REIER LAAN SANDDRIFT	POSTAL CODE	8290
TEL NO:		CELL NO:	078 685 7022
FAX NO:		EMAIL ADDRESS:	goperations2015@gmail.com
APPLICATION AREA TO WHICH YOUR COMMENT RELATES: (Please tick box)	PR 12664 - PRAA 1	PR 12663 - PRAA 2	<input checked="" type="checkbox"/> ALL

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

Ek en die volgende gemeenskaplede verwerp die aansoek van SAMARA om die volgende redes:

Ons het geen vooraf inligting ontvang nie en kan nie toestemming verleen nie,

ONS DIE GRONDEIENAARS HET GEEN VOORAF

INLIGTING GEKRY NIE, ONS KAN GEEN KOMMEN-
TAAR LEWER SONDER VOORAF GOEDKEURING NIE;

Die wet noem die grondeienaars, moet vooraf inligting verkry om 'n besluit te maak, nie Konsultering nie.

- Daar was geen konsultasie met Richters-
velders - wat die wettige grondeienaars is.

- Vergadering uitgestel, gemeenskap dra geen kennis van die SAMARA aansoek nie

- Ons het geen dokumentasie ontvang nie, ons is nie ingelig - die konsultant het slegs boodskappe gestuur en kennisgewings laat aanbring.

- Ons hoor hulle gaan in die rivier myn:
Hoe gaan hulle daar kom? - wat van bedreigde plante?

NAME & SURNAME: _____

DATE: _____

SIGNATURE: _____

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

Ons het nie die volgende dokumente gekry nie

- Scoping reporte vir verskillende myn areas nie
- Visuele scoping report
- Grondwater verslae en report
- Mynplanne
- En al die aanhangsels wat saam met die

aansoek gaan

Verder eis ons:

DIE VOLLE AANSOEK + DIE VOLLE MYNAANSOEK

MET NAME ADRESSE VAN AANSOEKERS NA ONS

GESTUUR MOET WORD: NS, VOLGENS WET IS ONS

GEREGTIG DAAROP - SIEN DIE SAAK NO: 9628/2015,

TUSSEN Duduzile Baleni & Others v Regional

Manager: Eastern Cape Department of Mineral
Resources & Others.

Alle inligting moet in Afrikaans wees en
ons eis hierdie inligting sodat ons ingeligte
besluite kan maak. Ons is geregtig op
daarop, ons kan nie besluite neem sonder
goeie inligting nie. Ons VERSOEK DAT

HIERDIE INLIGTING VOOR SLUITINGSdatum VAN

AANSOEK AAN ONS GESTUUR MOET WORD, 14 DESEMBER
2020.

NAME & SURNAME: _____

DATE: _____

SIGNATURE: _____

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

Waar gaan hulle padie maak?

Die rivier is geormerk vir Besproeiing, nie vir Myne nie

Die wet noem GEEN nuwe myne mag toegelaat word in die Park nie

Die wet noem GEEN myne in die wêrelderfenis gebied nie.

Ons voorouers se grafte is ooral langs die rivier.

DIE VOLLE GEOOGDE MYN HUUR AREA IS HEILIGE GROND VIR DIE NAMA GRONDEIENAAR VAN DIE RICHTERSVELD

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Die konsultant het geen van bogenoemde redes in aanmerking geneem nie

DIE NAMA VAN DIE RICHTERSVELD IS DIE KETTIGE EIENAAR VAN DIE RICHTERSVELD ALVORENS ENIGE MYNAANSOEK SLAAG MOET ONS TOESTEMMING GEE.

NAME & SURNAME: RIERT CLOETE

DATE: 14.12.2020

SIGNATURE: 

RE: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Kamburona Jolanda <KamburonaJ@namwater.com.na>

Tue 12/15/2020 9:12 AM

To: Marissa Botha <botham@naledzi.co.za>

Good Day Marissa,

NamWater has the following comments on the above mentioned project:

1. The Orange River Estuary and Mouth (declared Ramsar site) does not lie very far from the project site and hence the concern. Acknowledgement has been shown in the report, but caution should be taken as not to affect the estuary and the River Mouth.
2. The proposed project locations are downstream of the NamWater Rosh Pinah abstraction point and will therefore not affect the quality of the abstracted water for Rosh Pinah.

Regards,
Jolanda

From: Marissa Botha < >

Sent: Monday, 16 November 2020 21:59

To: Rawayda.baulackey@dpw.gov.za; siphumelelo@siteplan.co.za; AviweNyakaza.denc@gmail.com; gLetimela@ncpg.gov.za; rtimothy@nbkb.org.za; Donavan.Fullard@wessa.co.za; mulaudzin@dws.gov.za; AckermanP@dws.gov.za; Kusel@dws.gov.za; mulaudzin@dws.gov.za; AckermanP@dws.gov.za; Kusel@dws.gov.za; info@roshskor.com.na; Alexander.Maasdorp@roshskor.com.na; info@roshskor.com.na; ceo@ormdtc.com.na; led@ormdtc.com.na; gscholtz@ormdtc.com.na; aunie@omdis.co; mufetip@mawf.gov.na; mujetenga08026@itc.nl; lhipondoka@mrlgh.gov.na; lmhipondoka@gmail.com; vmalango@chamberofmines.org.na; welcome@fenata.org; africuri@mweb.com.na; DiguN@namibiaturism.com.na; Lgreeff-Villet@peaceparks.org; bobby@groundwork.org.za; hanneline.smit-robinson@birdlife.org.za; succulent.karoo.research.station@kabelbw.de; skepsanbi@gmail.com; e.marinus2@sanbi.org.za; gill@azef.co.za; acpico@macau.ctm.net; fernandr@macau.ctm.net; info@alexkor.com; Info <Info@namwater.com.na>; du Plessis Nicolaas <PlessisN@namwater.com.na>; bonnies@ewt.o0rg.za; yolanf@ewt.org.za; bonnies@ewt.org.za; jnbadmin@wessa.co.za; muna@iafrica.com

Cc: Desmond Musetsho <dmusetsho@naledzi.co.za>; Ndivhudzannyi Mofokeng <atshidzaho@gmail.com>

Subject: Fw: Notice: Availability of Draft Scoping Reports for public review- Two Prospecting Right Applications on left bank of Lower Orange River, Northern Cape, South Africa

Dear Stakeholder,

OPPORTUNITY TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON DRAFT SCOPING REPORTS AS PART OF AN EIA PROCESS FOR TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS

Samara Mining Pty Ltd has submitted two applications for environmental authorisation to the Department of Mineral Resources (DMR): Springbok (South Africa) for alluvial diamond prospecting and bulk sampling on the left bank of the Orange River. The application areas are located close to Sendelingsdrif in the Richtersveld, Namakwa District within the Northern Cape Province of South Africa.

The applications are subject to a full EIA Process in terms of the South African EIA Regulations of 2014 published under the National Environmental Management Act, 107 of 1998 and associated public participation process. The application areas are end-to-end and a consolidated EIA process is being

followed. Naledzi Environmental Consultants Pty Ltd has been appointed as the independent environmental assessment practitioner to facilitate the EIA Process.

An application will also be submitted to the Department of Water and Sanitation in terms of the South African National Water Act 36 of 1998 for a Water Use License.

The prospecting right application areas (PRAA) include:

Applications	Property	Size
PRAA 1 – (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11	987.98 Ha
PRAA 2 – (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18	690 Ha

As part of the application documentation, Samara must submit a Scoping Report, Environmental Impact Report (EIR) and Environmental Management Programme (EMPR) for each application to the DMR for decision making. The documentation must be subjected to a public participation process before it can be submitted to the DMR for decision making.

You are hereby notified of the applications and the availability of the Draft Scoping Reports for each application and a consolidated Public Participation Process from Friday 13 November to Monday 14 December 2020.

The draft Scoping Reports are available for public review from Friday 13 November until Monday 14 December 2020. Electronic versions of the reports and a comment sheet are available on the Naledzi website: <http://www.naledzi.co.za/public-documents-naledzi.php>.

Hard copies of the reports are available from the following public venues within the Richtersveld, Northern Cape, South Africa:

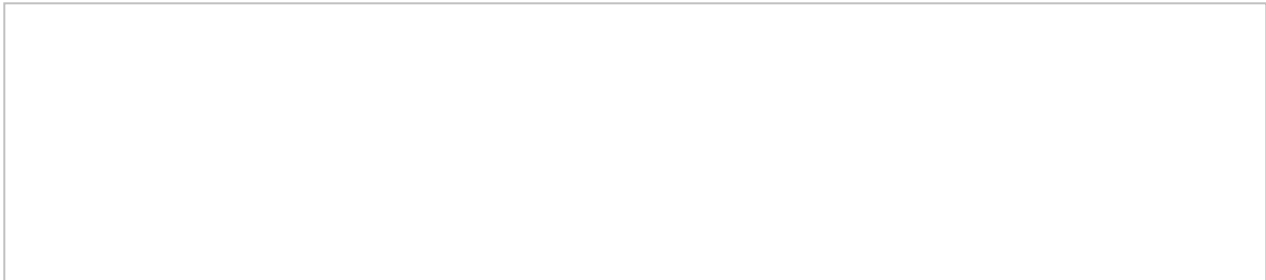
- Sanddrif, Alexander Bay, Lekkersing, Eksteenfontein and Kuboes in the Richtersveld
- SANPARKS Office, 1 Marshall Street in Sendelingsdrif, Richtersveld National Park

Please refer to the attached English Interested and Affected Party (I&AP) notification letter for more details.

Regards,

Marissa Botha
 Naledzi Environmental Consultants Pty Ltd
 Email: botham@naledzi.co.za
 Cell: 084 226 5584
www.naledzi.co.za

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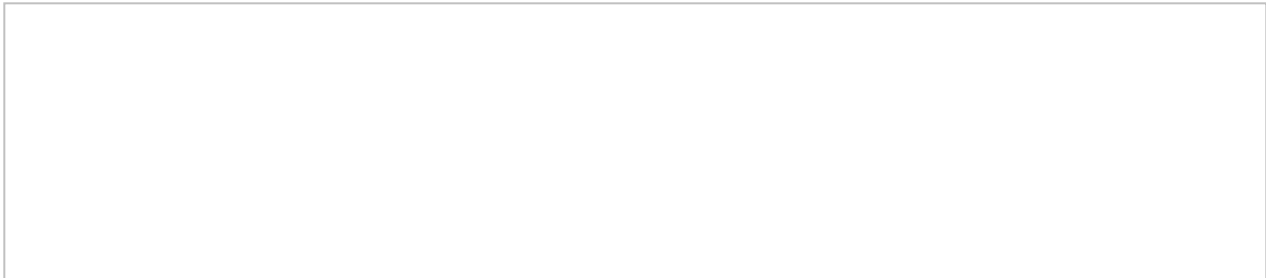
Nicolaas du Plessis

Senior Environmentalist

Water Quality and Environmental Services

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Area, Windhoek, Namibia
Private Bag 13389, Windhoek,
Namibia
Tel: +264 (61) 71-2093, Fax: +264
(61) 71-2097
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Jolanda Kamburona

Environmentalist In-Training

Water Quality & ES

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COMMENT SHEET FOR DRAFT SCOPING REPORTS

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA) APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT OF THE NORTHERN CAPE PROVINCE

Prospecting Right Application Area (PRAA)	DMR Reference Number	Property
PRAA 1	NCS 30/5/1/1/2/1 (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11
PRAA 2	NCS 30/5/1/1/2/1 (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18

EAP CONTACT INFORMATION: Naledzi Environmental Consultants Pty Ltd
 Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700
 160 Marshall Street, Polokwane
 Tel: 015 296 3988 Fax: 015 296 4021
 Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond)
 Email: botham@naledzi.co.za or dmusetsho@naledzi.co.za

TITLE (Prof/Mr/Mrs)	Prof	FIRST NAME	Norbert
SURNAME	Juergens		
CAPACITY (eg. Director/Secretary)	Director Herbarium Hamburgense HBG		
ORGINASATION	University ofHamburg, Institute of Plant Sciences and Microbiology		
POSTAL ADDRESS	Ohnhorststr. 18, Hamburg, Germany	POSTAL CODE	D 22609
TEL NO:		CELL NO:	+49-170-166500
FAX NO:		EMAIL ADDRESS:	norbert.juergens@uni-hamburg.de
APPLICATION AREA TO WHICH YOUR COMMENT RELATES: (Please tick box)	PR 12664 – PRAA 1	PR 12663 – PRAA 2	ALL : x

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

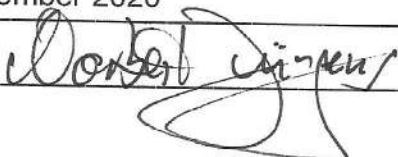
A The greater DRAA (marked by blue dots) encompasses almost the complete area of a major habitat type along the most important perennial water resource in this arid region. Even if at present no immediate activity is planned within the whole large DRAA area the EIA should logically mirror this coverage of the almost complete habitat system along the river from near De Hoop to near Grootderm. The large scale of the DRAA requires an integrated assessment of the Namibian and the South African side.

B The aquatic ecosystems & biocoenoses of the Orange River are already damaged by the decreasing water level, chemical pollution, & fishing. This impact is likely to increase with projected climate change and upstream land use change. Therefore, special care should be given to migratory fish and other aquatic life.

C The ancient (mostly tertiary?) gravel terraces along the river carry endemic flora and fauna which has not yet been published. As the main author of all the vegetation types cited in the scoping report I am aware that these small units were not covered by the larger landscape units used in the 2012 and 2018 Vegmap nor in the riverine vegetation. This insufficiently covered "blind spot" between the large landscape units in the hinterland and the gallery forest requires an integrated study on both banks as the gravel terraces have already been heavily degraded by mining on the Namibian side as well.

NAME & SURNAME: Norbert Juergens

DATE: 14 December 2020

SIGNATURE: 



the denc

Department:
Environment & Nature Conservation
NORTHERN CAPE PROVINCE
REPUBLIC OF SOUTH AFRICA

90 Long Street
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Enquiries : P. Cloete
Dipatlisiso :
Imibuzo : E-mail: peter.denc87@gmail.com
Navrae :
Reference : NCS-30/5/1/3/3/1(531) MR
Tshupelo :
Isalathiso :
Verwysing :

Date :
Leshupelo :
Umhla : 30 October 2020
Datum :

Siphumelelo Mbali
Site Plan Consulting
PO Box 28 Strand
7139
South Africa
Siphumelelo@siteplan.co.za

Cc Deidre Kasten (deidre.Karsten@dmr.gov.za).

Dear Mr. Mbali

**RE: DRAFT SCOPING REPORT FOR LISTED ACTIVITIES ASSOCIATED WITH MINING RIGHT:
SECTION 102 APPLICATION FOR AMENDMENT OF THE MINING WORK PROGRAM AND
CONCURRENT EMP AMMENDMENT/UPDATE (LOWER ORANGE RIVER MINES UNDER LOR-D)**

In order to ensure that there is sufficient information for an informed decision to be made, please address the necessary ecological issues as outlined in the letter. Please note that the comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

Background

Lower Orange River Diamonds (LOR-D) having been ceded with the mining right by Trans Hex Group (TGH) is now the holder of the Right in coordination with its operational company Plateaux Diamonds (Pty) Ltd who engages with numerous Joint Venture (JV) Companies who conduct the mining operation of the Right. Accordingly, the Mining Right has the same area and definition of Rights as previously held by Trans Hex Group (THG). The change in ownership, with new company structure, and the fundamental changes at LOR mine requires amendments/updates to the EMP.

- A general shift of mining emphasis from Proto to Meso terraces.
- An emphasis on reprocessing mine residue dumps (coarse and fine tailings of THG) and;
- Amongst others a new approach to processing plants from existing large central fixed Dense Medium Separation (DMS) ferrosilicon plants to dispersed in-field pan-type or direct recovery Bouvestnik semi-mobile processing plants to match the redefined target reserve distribution and the management structure of LOR-D/Plateaux Diamonds (Pty) Ltd with Joint Venture (JV) partners (not a central THG operation).

Herewith the comments for the proposed developments:

It is important to note that part of the mineral right area is located within the Ai/Ais Richtersveld Transfrontier Park, which is a national park managed by SANParks, and therefore classified as a Protected Area according to the Biodiversity network. Emphasis on the protected area status of the area that will be affected and the requirements for managing mine activities in a protected area estate should be vigorously assessed.

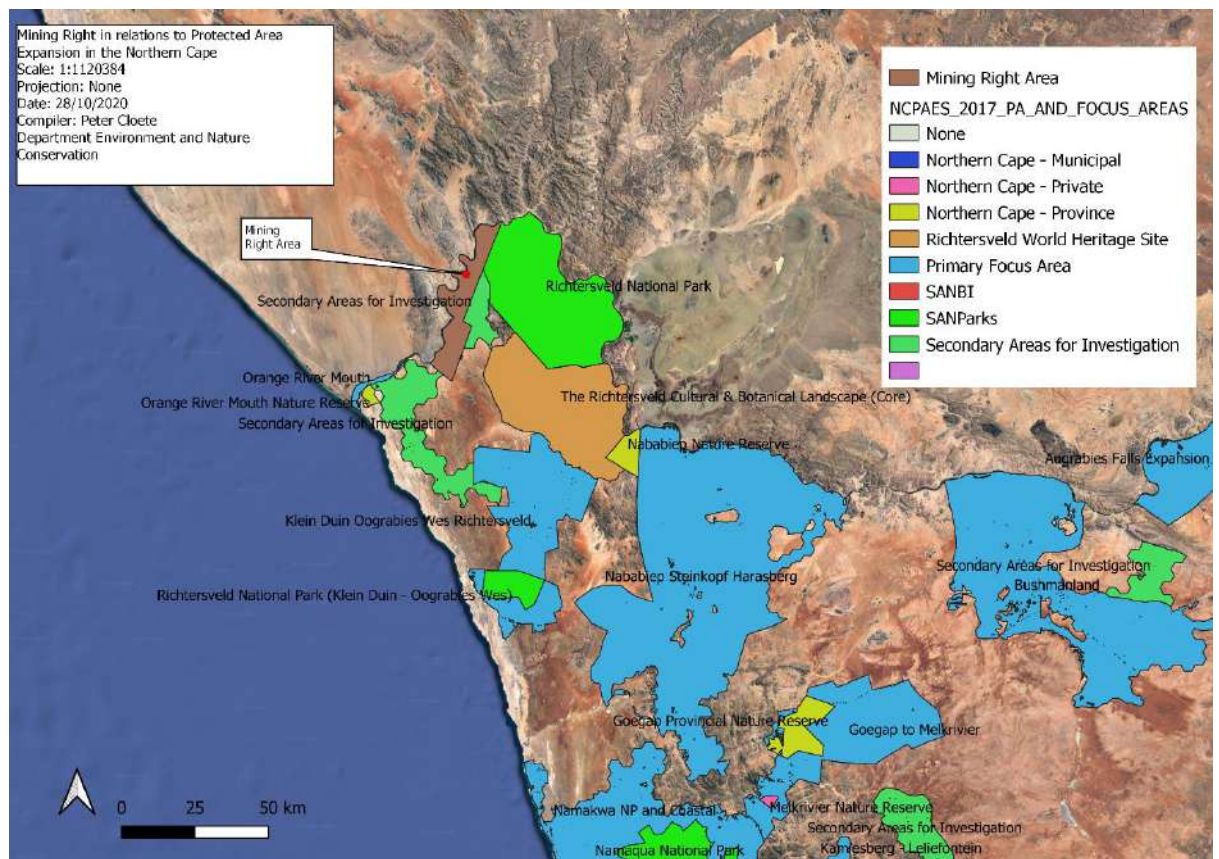


Figure 1: Richtersveld Mining Right area in relation to protected areas and the National Protected Area Expansion Strategy.

As stated in the Draft Scoping Report, the vegetation in the concession area/development footprint lies within the area known as the Dessert Biome and remnants of the Succulent Karoo and Azonal Vegetation Biome in the south (Figure 2). Conservation of the Dessert and Succulent Biomes is of international importance (i.e. including the vegetation in the concession area, and that of the of the Western Richtersveld). Impacts associated with the mining activities are expected to be highly negative and of a long-term nature, possibly permanent duration. It is thus extremely important that the feasibility of all proposed mitigation measures is fully assessed during the EIA process. Mitigation measures should not have to rely on additional information obtained after authorisation to determine whether sensitive areas can be avoided or not. Mitigation measures must be identified and incorporated into the EIA (as recommendations) and incorporated into the EMP prior to authorisation. It is for this reason that we requested that the specialist undertake detailed ground-truthing of the proposed development area during the assessment phase. Ground truthing must be done during the growing season to enable proper data collection.

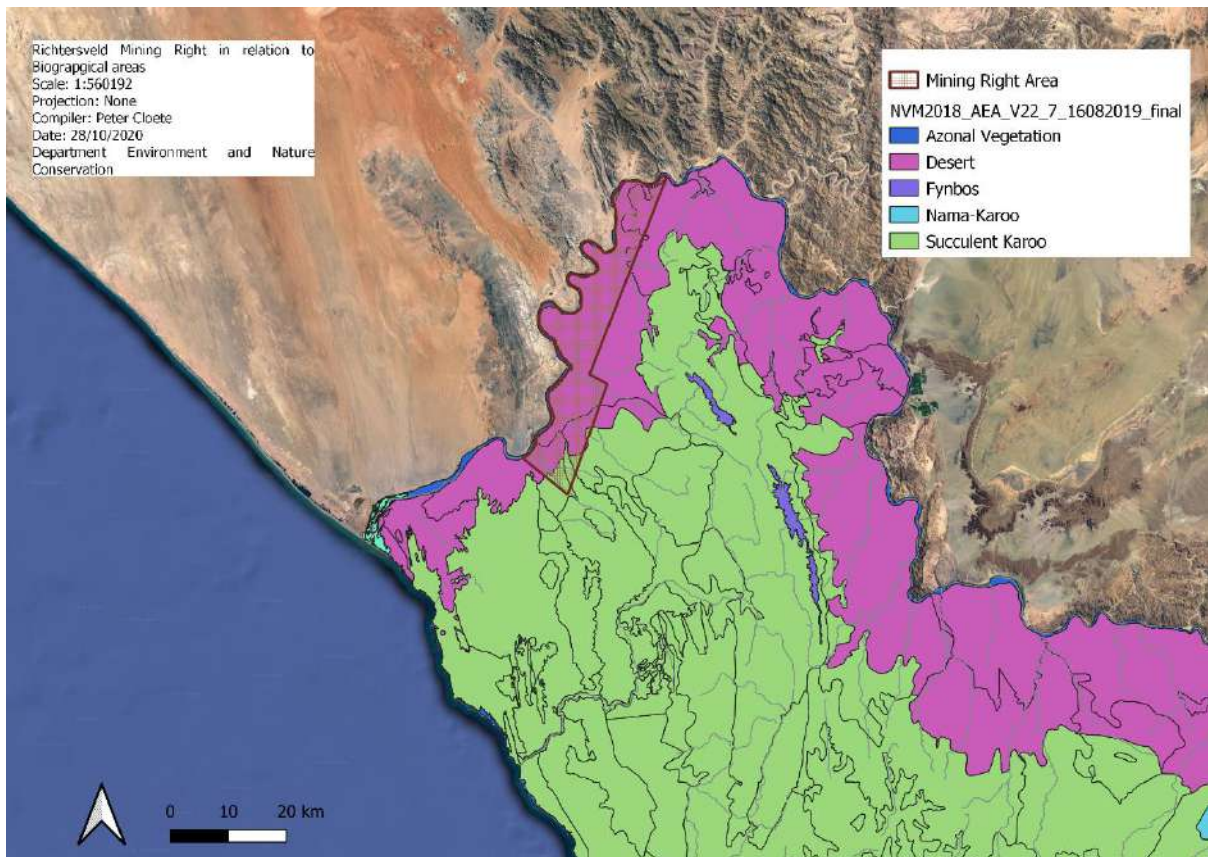


Figure 2: Richtersveld Mining Right in relation to Biographical Areas (SANBI, 2018).

The Draft Scoping Report indicates that the “proposed project will necessitate the transformation of natural vegetation of the Western Gariep Lowland Dessert (Conservation target: 28%; Not Protected); Lower Gariep Alluvial Vegetation (Conservation target: 31%; Poorly Protected); Western Gariep Hills Dessert (Conservation target: 28%;

Poorly Protected); Noms Mountain Dessert (Conservation target: 34%; Well protected)". According to the updated map (SANBI, 2012) the mining right area is also located in small portions of the *Upper Annisvlakte Succulent Shrubland* and *Richtersveld Red Duneveld*. Less than 50% of the biodiversity target has been met for all these vegetation types (Mucina and Rutherford, 2012), resulting in remaining remnants being important for conservation. Will a botanical specialist be appointed to provide a botanical statement or to compile a botanical assessment, which could inform the final mine layout plan? It is recommended that the botanical evaluation be complemented by a detailed focused description of vegetation occurring within the development footprint, this can further inform a site and habitat specific EMP; conducted by a qualified individual familiar with the terrain.

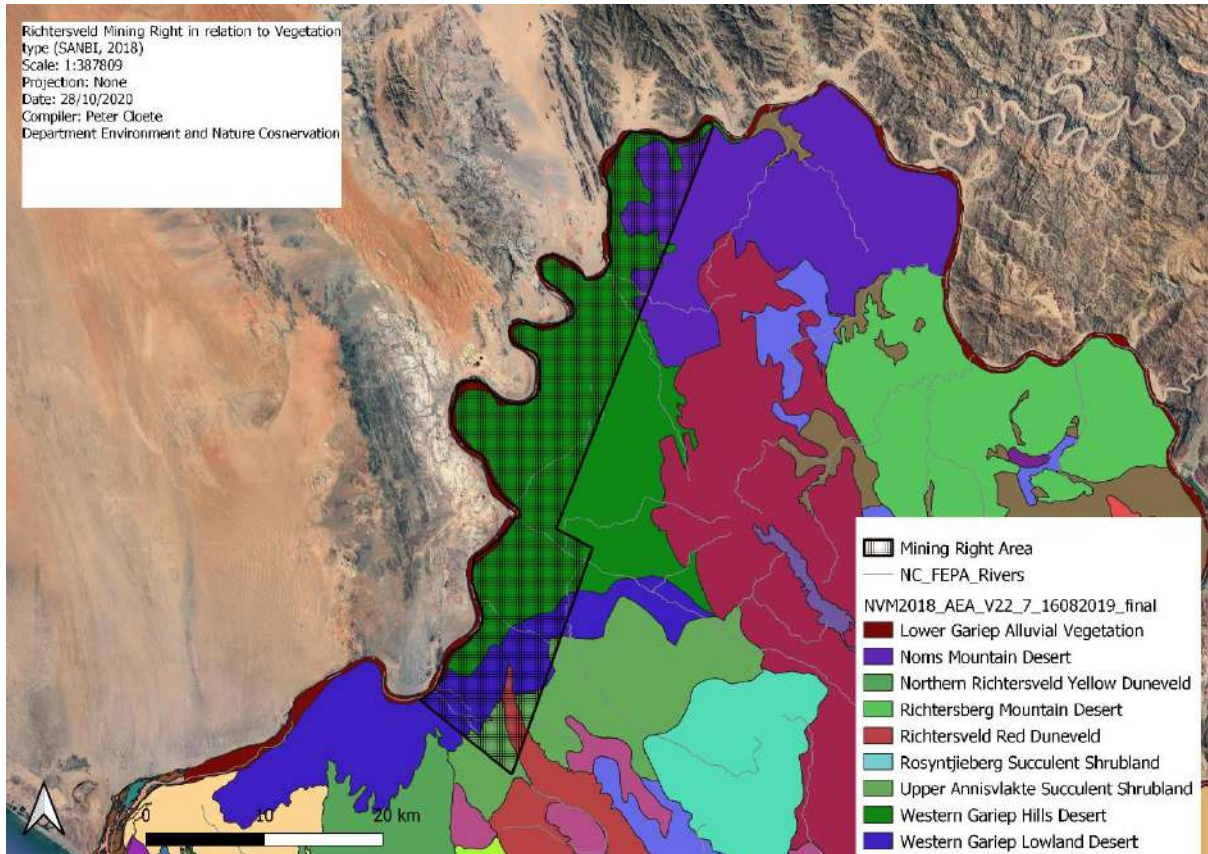


Figure 3: Richtersveld Mining Right in relation to Vegetation Map of South Africa

It was noted that there were no botanical impacts listed in the report, but some ecologically aspects were mentioned. Of particular importance is the habitat fragmentation and cumulative impacts on the meso terraces; their interfaces with the Orange River (riparian vegetation zone) and their interfaces with hard rock slope. DENC recommends that the specialist rate these impacts accordingly and also advise regarding operational activities. Activities which may cause fragmentation of botanical value leading to loss of ecological connectivity are not supported. Can the specialist elaborate and how the habitat sensitivity was classified? All botanical impacts should be listed and rated accordingly by the specialist on the following vegetation sensitivities (after ground truthing there might be more sensitive habitats):

- Orange River (riparian vegetation zone),
- Vegetation of the hard rock hillslope toes,
- the Meso terraces themselves with their scant vegetation.

All endangered, protected and indigenous fauna and flora species (listed in Schedules 1, 2 and 3 respectively) in terms of the Northern Cape Nature Conservation Act, 1999 (Act No. 9 of 1999) may not be picked, harmed or removed without a biodiversity permit from DENC (aligned to NEMBA and NEMA). Without the relevant and sufficient information to enable an informed decision in accordance to our environmental mandate (sustainable development, ensure ecosystem function and representative units conserved, prevent high species extinction probability increase) this permit could prevent mining activities to continue. The authorisation will stipulate that you cannot continue with your activities without the relevant permits to be obtained, which include the biodiversity permit needed from DENC.

Precautionary procedure must be put in place. In the event of the discovery on fauna on sites. As such the following is to be included: "No fauna found on site may be disturbed, removed, harmed, or killed. If an animal is found that does not move by itself off site". A fauna permit from DENC is needed for the removal of such species and specialist assistance must be obtained to ensure that the removal of the fauna is ethically and safe (not harming the species).

Selected remaining areas of natural vegetation and habitats have been designated as either: declared Protected Areas; Critical Biodiversity Areas 1 (e.g. riparian vegetation; rocky ridges and Meso terraces) or CBA 2 (e.g. river corridors), as part of the CBA conservation network; in addition to Ecological Support Areas. Figure (4) shows the proposed mining development are situated on large sections of the Critical Biodiversity Areas (CBA1) network, representing the core ecological areas to be conserved / sustainably managed to ensure ecological functionality across the landscape and securing ecosystem services. CBA areas are defined as: "*Areas in a natural condition that are required to meet biodiversity targets, for species, ecosystems or ecological processes and infrastructure.*".

CBA 1 & 2 objectives are: "*Degraded areas should be rehabilitated. Only low-impact, biodiversity-sensitive land uses are appropriate.*".

ESA are defined as: "*Areas that are not essential for meeting biodiversity targets, but do play an important role in supporting the functioning of PAs and CBAs, and are often vital for delivering ecosystem services.*".

ESA objectives are to: "*Restore and/or manage to minimize impact on ecological processes and ecological infrastructure functioning, especially soil and water-related services, and to allow for faunal movement.*".

CBA regions are thus required to meet biodiversity targets for species, ecosystems, and ecological processes. Although the area selected may have undergone a level of disturbance, this cannot be used as motivation for establishing the further development within CBA or ESA areas. It should be noted that it is the landowner's responsibility to ensure the impacts is suitably manage at a level consistent with Best Practice Guidelines. The loss

of CBA area on the site will therefore compromise conservation targets and the loss of ESA would compromise the CBA. The loss of CBA is of international importance and extent as the reason we have CBA layers is to comply with our international agreements as well. Please be sure to reflect this accordingly within the relevant impact assessment determinations.

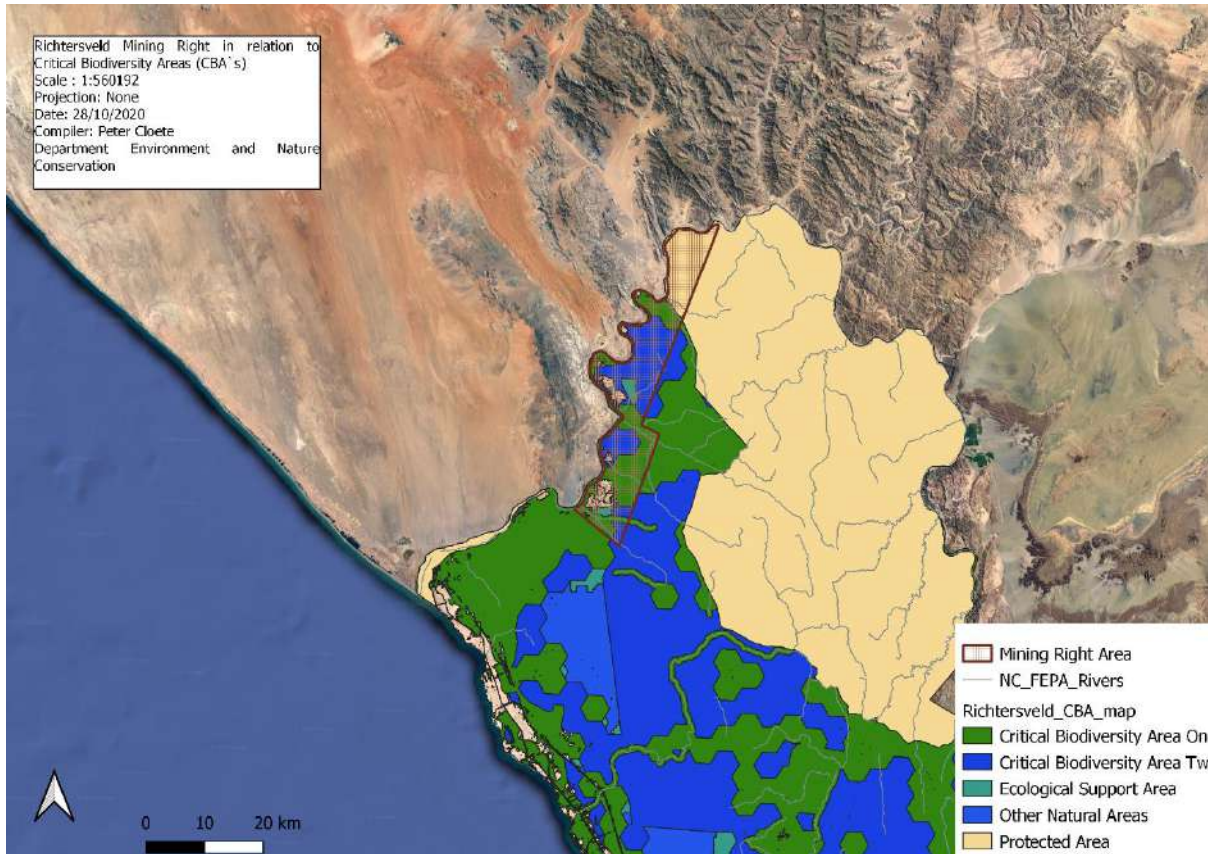


Figure 4: Richtersveld Mining Right in relation to the Northern Cape Critical Biodiversity Areas (2012)

It is a key requirement that all sensitive areas identified in the botanical study must be avoided. Any impacts on these sensitive areas would be considered as impacts of unacceptably high significance.

Should construction take place at two or more locations situated far from each other at the same time, then the appointment of more than one ECO is recommended. Such a condition will be included in the recommendations

Based on the significance of the proposed expanded impacts a Biodiversity Offset is most probably triggered. We therefore propose the assessment of a proposed **Biodiversity Offset of CBA's** that could be lost as a result of the proposed development. This would entail that a Technical Biodiversity Offset Report would have to be compiled reflecting (amongst other aspects) how the mitigation hierarchy of NEMA has been optimally implemented and what the extent of the residual impact will be of this development. It then has to be argued if these developments constitute a fatal flaw, and if not regarded as such why these developments do not trigger a fatal flaw. The general guideline proposes that significant impacts on a CBA1 translates into 1:30 offset ratio and on a CBA2 translates into 1:5 up to 1:20 offset ratio. It then needs to be assessed if an offset would be feasible and what the plans are (including

identifying offset areas) to implement the biodiversity offset. The strategy for implementing the offset and the costing of such should also be contained in the offset report.

Terrestrial Ecosystems

The Lower Gariep Alluvial vegetation has been listed under NEMBA as an endangered ecosystem and river systems has been assessed as being one of the most threatened ecosystems (and its ecosystem service i.t.o. water security) in the National Biodiversity Assessment of 2018. These need more detailed attention in your assessment and in the EMPR, both i.t.o. the developments' impact on these ecosystems (including Orange River water quality impacts), the additional trigger for more biodiversity offsets (if not a fatal flaw) and what mitigation and management measures will be implemented to avoid, reduce and prevent these ecosystems from collapse. Endangered status implies that the ecosystem is highly threatened and extremely close to collapse, thus very concerning. Buffer guidelines for Protected Areas and freshwater ecosystems must both be incorporated into the impacts assessment process, and the revision of the EMPR.

A freshwater assessment must be conducted which include delineation of the freshwater features on the mining area in accordance with the standard DWAF methodology (2005, 2008). Buffers from water courses should be provided. Buffers should be determined based on the potential of contaminated water sources. Adequate buffers must be kept between all mining activities and existing natural vegetation and watercourses. If there's any water use in terms of Section 21 (a) ;(b); (c) ; (d) ; (g) &(i) or/and Section 32 and 33 of the National Water Act, (Act 36 of 1998) attached to this property, such water use cannot be utilized as part of this activity if it was registered with the department under the mining sector. This matter should be discussed with DWS.

Social Labour Plan

In terms of the Social Labour Plan it was noted that agricultural activities will be undertaken that aid towards the socio-economic development of the Richtersveld Communities. Ideally, an Agricultural Impact Assessment should be included in the Final EIA report to permit such activities.

Feasibility and probability assessments must be done that include investigations into the reasons as to why former developmental initiatives in this region failed.

Air Quality Management

It is noted that fugitive dust emissions from mining activities are likely to occur during site establishment, mining activities and the decommissioning phase of the proposed development. The dust control mitigation measures indicated must clearly be assessed in the EIA process. A dust deposition model must be provided to establish the dust impact zone of the mining activities.

The operating hours of the proposed mine as indicated in the Draft Scoping Report must be indicated in the EMPR.

Heritage

Precautionary procedures must be put in place. In the event of the discovery of archaeological and paleontological materials. Therefore, the following is to be included: "Construction work must halt immediately in the event of a discovery of archaeological and paleontological materials and SAHRA must be informed. If human remains are found the nearest Police is to be contacted".

Following a review of the application and appendices, and given the above-mentioned sensitivities of the site, DENC would like to make the following comments/recommendations:

1. Department of Agriculture, Forestry and Fisheries (DAFF), as a custodian of forestry resources in South Africa, will must be engaged for their inputs and comments. Should any trees listed under their legislation be impacted, a forestry license is needed in addition to the DENC permits. In the interest of cooperative governance, DENC and DAFF (Forestry component) will collaborate and liaise i.t.o. permit conditions, concerns and any other matter identified that needs deliberations.
2. The riverine vegetation mapped as Lower Gariep Alluvial Vegetation is classified as a CBA 1 and listed Endangered. As noted above this feature is one of the reasons for the CBA in this area. More information on CBA and ESA status and management guidelines is available in both the National Biodiversity Spatial Plan Handbook and associated online maps available on SANBI's BGIS website. The desired management objective for the CBA 1 area is that they are restored and/or managed to minimise impact on ecological infrastructure functioning, especially soil and water related services – of particular reference given that the reason for the CBA's and ESA along the river in this area is for water source protection water.
3. The gaps identified in the impact study and EMPR above must be addressed in the final EIA and EMPR. This include the biodiversity offset report that would form part of the specialist report appendices to the EIA.
4. The dilemma is of course to weigh up the overall economic benefits, both broadly and locally, against potential and actual ecological adverse impacts. In this regard the methodology used to assess cost/benefit is important, before arriving at a conclusion. Has it e.g. been taken into account what the impact may be on the tourism potential of the Richtersveld National Park as well as areas along the banks of the Orange River? In such case it may not only be a socio-economic impact but also an impact on the biodiversity. It is important and appropriate to interrogate this matter in more detail. How many people are dependent on the Orange river for domestic use,

and subsistence living e.g. in comparison to how many jobs might be created? What are the ecosystem services the development will impact that people are dependent on?

5. DENC propose, that all threatened vegetation that falls within the footprint of impact must be rescued and donated to the Rischtersveld Botanical Garden and SANBI. Should these potential off-set points indicate they cannot accept such donations it must be provided in writing and alternatives identified to conserve these species (this must occur prior to commencement of activities). The remainder of species must be used for rehabilitation purposes. DENC would like to reiterate that all endangered species, protected species and indigenous species, i.t.o. the Northern Cape Nature Conservation Act, 1999 (Act No. 9 of 1999), may not be picked or removed without the relevant permit from DENC. This is also to ensure that rescued plant material is accounted for and used in the rehabilitation or relocation processes. To obtain such permits please contact the Permit Unit Officials at the Head Office in Kimberley.
6. The use of the mitigation hierarchy must clearly reflect how the readjustments and redesign of layout were investigated to identify the most suitable, lowest environmental impacts, impact areas to be cleared and mined. If there is any aspect regarded to have no alternatives, it must be justified and argued in accordance.
7. Rehabilitation of any disturbed ecosystems is only considered successful when the ecosystem has returned to an ecologically functional state and has a similar species assemblage as its natural state. The complete rehabilitation plan must be appended to submitted documentation.
8. Clearing of alien vegetation will not be considered as a mitigation measure that offsets the environmental impact of the development.

We hope you find these recommendations in order.

Yours sincerely



Ms. E Swart

Scientific Manager Gr B: Research and Development Support Unit

6/11/2020

Two New Plant records for South Africa, a species list of Fauna and Flora, and a Socio-ecological Impact Study highlighting various concern due to Diamond Mining, on the last untouched Meso-Orange River Terrace, Pooitjiespram within the Richtersveld National Park, Northern Cape Province.

- a) Pieter Van Wyk, Richtersveld National Park Nursery Curator, /Ai /Ais Richtersveld Transfrontier Park, P.O. Box 406, Alexander bay 8290, SANParks.
- b) Dr Hugo Bezuidenhout, Specialist: Vegetation Ecologist, P.O. Box 110040, Hadison Park, Scientific Services, Kimberley 8306, SANParks ¹ & ².
- c) Brent Whittington, Richtersveld National Park Manager, /Ai /Ais Richtersveld Transfrontier Park, P.O. Box 406, Alexander bay 8290, SANParks.
- d) Aletta Links, Richtersveld National Park People & Conservation Officer, /Ai /Ais Richtersveld Transfrontier Park, P.O. Box 406, Alexander bay 8290, SANParks.

¹Scientific Services, South African National Parks, Kimberley, South Africa

²Applied Behavioural Ecology and Ecosystem Research Unit, Department of Environmental Sciences, University of South Africa Private bag X6, Florida Campus, 1710, South Africa

Abstract: Pooitjiespram contains the last untouched Meso-Orange River Terrace within the Richtersveld National Park, hosting species with special conservation concerns, as well adjacent to the Endangered Lower Orange River Alluvial Vegetation; it is also home to Nama Livestock Farmers whose families have been using the locality for at least the past 100 years, and is an important campsite for tourist and community events by the park's People & Conservation department.

Introduction:

The introduction of the Biome concept, based largely on a classification of growth forms and major climatic determinants has led to the description of South Africa's 7 biomes. Of these biomes Fynbos, Succulent Karoo and Nama Karoo Biomes occupy southern Africa's southwest winter and summer rain fall region (Rutherford & Westfall 1986) and a later introduced biome, the Desert Biome (Rutherford & Westfall 1994). A map introducing the seven biomes of South Africa, namely: Savanna, Thicket, Grassland, Forest, Fynbos, Nama Karoo, Succulent Karoo and Desert where introduced later (Rutherford & Westfall 1994; Low & Rebelo 1996; Mucina and Rutherford 2006). The Richtersveld is very unique in that it is situated within three of these biomes, namely the Succulent Karoo Biome, Desert Biome and Nama Karoo biome (Jürgens 1991), and are possibly the main reason for the extreme high biodiversity found within the area. Of these biomes the Fynbos and Succulent Karoo biomes have recognition as two of Earth's biologically richest and most endangered terrestrial Eco regions (Mittermeier *et al.* 1999).

Over the past years several new rare endemics have been discovered and in 2015 the South African National Biodiversity Institute (SAMBI) together with SANParks did a first upgrading of endemic plant taxa from this region, which was published on the South African Red List of Endangered species (Raimondo *et al.* 2015) (see image 1). A first species list was drawn up by Dr G. Williamson (Williamson, 2000) for the region. The Richtersveld National Park is a contractual park and belongs to the Richtersveld Communities. It is jointly managed by South African National Parks (SANParks) and the Richtersveld Community Management Committee (RGBK) ever since its establishment in 1991. As part of the agreement grazing by small scale livestock farmers is allowed within the park and mining (SANParks Management Plan). Due to the parks rich geology, variable topography and two rain fall seasons the area is home to many vegetation types that were first introduced in 1991 (Jürgens) and (Mucina *et al.* 2006).

The Orange River or the Senqu, as it is called high up in the Maloti Mountain of Lesotho, started its life as a small drainage line. The rainfall where the River originates in the central mountainous areas of South Africa / Lesotho varies from more than 1000 mm per year (high lying grasslands) to less than 40 mm rain per year (rocky deserts) in the west. The river unfortunately carries with it, apart from life-giving water and also diamonds, these two items that now threatened

the “life” of the Orange River (Bezuidenhout 2014). Apart from littering and polluting the River the human has discovered that they could also extract diamonds from the River, while the water are also used for agricultural purposes. In the past, the alluvial floodplains of the River were covered with riverine shrubland and woodland. However, there are indications that this has changed and this vegetation and associated habitat has been influenced by a number of actions, namely: i) expansion of irrigated crop farming, ii) up stream dam constructions, iii) grazing pressures and iv) mining activities. Apart from these actions alien plant species also started replacing the natural vegetation, which contribute to the threatened status of the associated green belt riparian woodland of the River (Bezuidenhout 2014). Previously work in the riparian vegetation has been done by Bezuidenhout, Hendricks and Harck in September 1997 and by Hendricks in 2004. A botanical reconnaissance (13th – 17th October 2014), by Park Management and Scientists from SANParks and SAEON, was carried out along the Orange River in the /Ai -/Ais Richtersveld Transfrontier Park to determine the nature and extent of changes to the threatened riparian woodland. Most of the Orange River was classified as critically endangered due to above mentioned actions (Bezuidenhout 1993, 1996 & 2001). The northern and eastern boundaries of the Richtersveld National Park are formed by the Orange River (Annexure C). The Orange River could be divided according to Van der Riet (2004)1 into six systems, namely:

System 1: Meso-riparian

This system is characterised by three zones:

- (i) Floodplain
- (ii) Riparian
- (iii) River-deserted zone

Comments: The River-deserted zone, which is predominantly covered by river stones, separates the riparian zone from the immediate vicinity of the Orange River.

System B: Hydro-riparian

This system is characterised by two zones:

- (i) Floodplain
- (ii) Riparian

Comments: The Riparian zone is found immediately next to the Orange River.

System C: Xero-riparian

This system has only a (i) Floodplain zone:

Comments: The system is characterised by a small Floodplain zone with little to no riparian vegetation. The upland is located very close to the Orange River.

System D: Absolute Xero-riparian

This system also has only a (i) Floodplain zone:

Comments: It is different from the Xero-riparian system and characterised by a large floodplain zone with absolutely no riparian vegetation.

System E: Nano-riparian

Open river system with little to no rocks in the absence of riparian vegetation.

Comments: This system consists only of the river system.

System F: Islands

An isolated landscape surrounded by the river covered by vegetation.

Comments: This system contains an island and associated vegetation.

(See Annexure C)

Mining within the Richtersveld National Park at present, is exclusively for diamonds. The Orange River is the main route for the transport of diamonds to the major deposits on the banks of the

Lower Orange River and the Namibian coastline north of the Orange mouth. Economic accumulations of diamonds were not found along the Orange River until 1966. Subsequently alluvial diamonds have been exploited from terrace gravels on both the South African and Namibian banks of the river over its lower 100 km. The lower Orange River has two distinguished suites of gravels, namely: 1. Older, higher suite, which is generally 50 to 70 m above the present river bed and is of early mid-Miocene in age (19 to 17 Ma), referred to as the **Proto-Orange River Terraces**, and 2. The Younger, lower suite, normally 30 to 40 m above the current river bed, which may be of Plio-Pleistocene (5 to 2 Ma) age, referred to as the **Meso-Orange River Terraces** (see Image 2.). Although these gravels are very low in grade, the diamonds they do yield are large (1 to 2 carat stones) and of >95% gem quality, with the best deposits in the Proto-Orange gravels. Grades are highest near the bedrock contact and in localised trap sites where levels of 10 to 50 carats per hundred tonnes are encountered as stones of 1.5 to 2.8 carats. Remnants of the Proto-Orange gravels are found over the lower 320 km of the river and thicken from <5 m upstream, to >80 m nearer the mouth. (Porter GeoConsultancy, 1999). On the Proto and Meso-Orange River Terraces, unique endemic flora evolved over the past (4-3Ma)(Williamson, 2000), and are today, due to diamond mining, one of the places of greatest conservation concern within the Richtersveld Bio Region, and South Africa, as can be seen in Image 1 (SANBI, 2015).

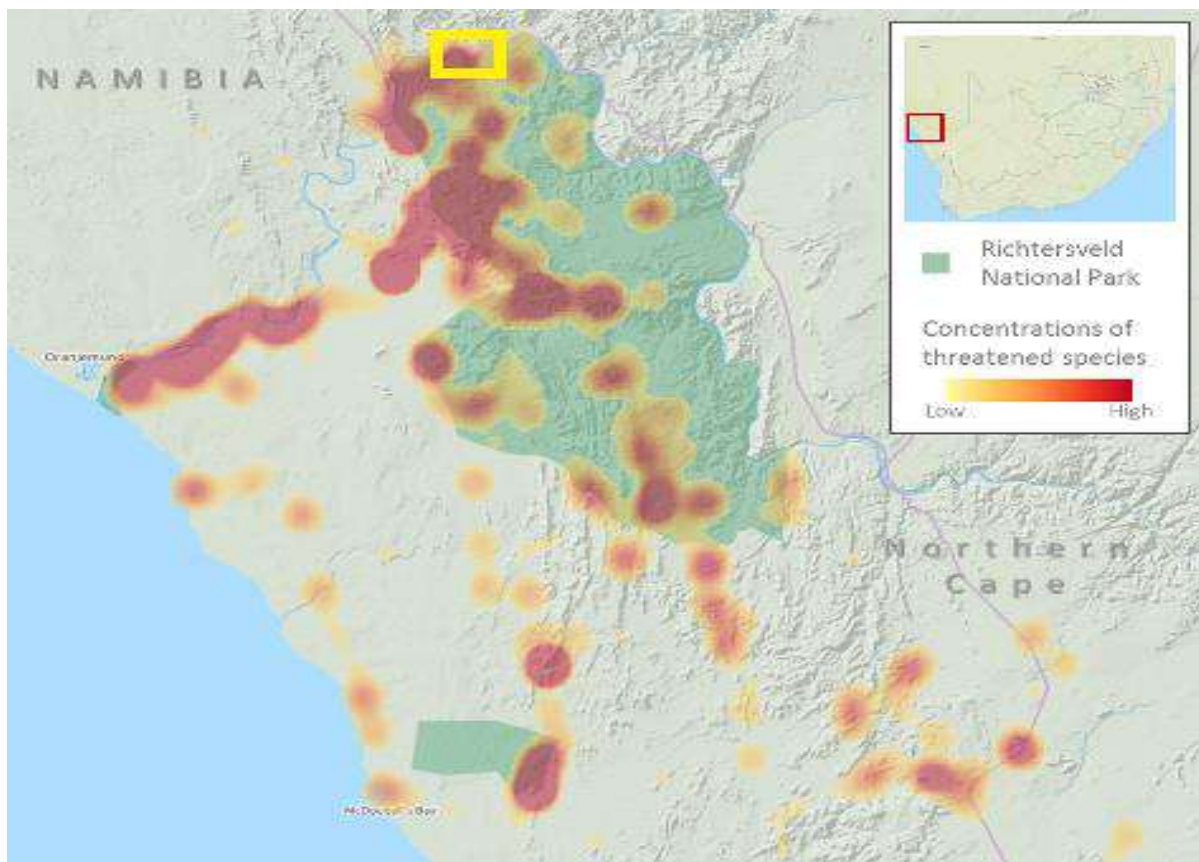


Image 1: SANBI Red List, 2015 indicating concentration of threatened species in the Richtersveld. The yellow square indicating Pooitjiespram falling within the “high” concentration of threatened species.

After the closing of the Transhex Mining Company in 2015, many concerns were raised by SANParks, due to the past negative impact of the mine on the environment and local community. One of these concerns was major habitat loss of species like *Portulacaria pygmaea* and *Monsonia multifida* and what the impact will be on such species, should mining continue in the future. For this reason SANParks, Richtersveld National Park started to assess the mining areas within the park, as a precaution, and found that only one site remained untouched within the park, namely: Pooitjiespram (see Image 2, 4 & 5). The SANParks Mandate, states the following: **The core mandate of SANParks is the conservation of South Africa's biodiversity, landscapes and associated heritage assets, through its system of national parks. SANParks also promotes and manages nature-based tourism and delivers both conservation management and tourism services**

through a people-centred approach. It became clear that one of the park's biodiversity assets is due to be lost, namely: The Meso-Orange River Terraces, keeping in consideration that all of the Proto-Orange River Terraces, has already been destroyed by the mines within the park. The Richtersveld National Park is the only formal protected area where the Proto & Meso-Orange Terraces falls within the Gariep Eco-geographic Unit, within the Richtersveld Bio Region (Snijmann, 2013), an area characterized for having many rare endemic, especially miniature bulbs within the Hyacinthaceae, Amaryllidaceae and Rusceae families. The Richtersveld National Park, and the Augrabiesfalls National Park is also the only two localities where the Lower Orange River Alluvial Vegetation, are protected. Assessment was started on the site in 2014, focusing on Fauna and Flora, and then postponed until 2020, due to drought.

The study area, Pooitjiespram, is also important for SANParks and the traditional landowners, the Nama People for the following reasons: 1. It is one of only three campsites used by tourist within the park, on the banks of the Orange River; 2. The Pooitjiespram Campsite is the only campsite used by the People & Conservation Department, for community outreach and environmental education related camps; 3. The site has 5 Traditional Nama Livestock Post, which are seasonally used by the nomadic pastoralist; 5. Special biodiversity, the only locality in South Africa, where *Drimia oliverorum* grows and 6. The largest natural area containing Lower Oranje River Alluvial Vegetation within the park.

The aim of this paper is to assess what the impact will be on the environment, SANParks in general. Also in this paper the biodiversity are assessed, by providing detailed species checklist with their conservation status. The study led to the first record of two species of Bulbs in South Africa, previously known only from Namibia, namely: *Drimia oliverorum* and *Eriospermum rautanenii*, a short description of them (See Annexure: A) as well a rare new form of *Cyanella ramosissima* is described (See Annexure: B).



Image 2: Meso-Orange River Terraces at the study area of this paper, Pooitjiespram with *Hoodia gordonii* (succulent in flower).

Study area:

Pooitjiespram falls within the Richtersveld National Park, Northern Cape, South Africa. The Richtersveld Bio region contains 336 known endemic plant taxa (Cowling *et al.* 1999). It is

acknowledged as one of the richest desert floras of the planet (Cowling *et al.* 1998) and forms part of a 'biodiversity hotspot' defined to set conservation priorities (Meyers *et al.* 2000). The last untouched single Meso-Orange River Terrace within the Richtersveld National Park falls within Pooitjiespram, and are the main focus for this study (see Image 2-4.). The terrace is situated immediately next to the Pooitjiespram Campsite, which is a very important campsite for the park, as there are only 4 campsites within the park, of which 3 are located next to the Orange River (see Image 5). The Pooitjiespram area is also important for hosting community groups under the People & Conservation department, and is used as a site for environmental education, as well cultural education. Pooitjiespram also has traditional livestock post, used by semi-nomadic Nama pastoralist, which is one of the main attractions to the Richtersveld (see Image 5 & 6).

The species checklists have been compiled only from what was recorded on the Pooitjiespram Meso-Orange River Terrace (see red circled area in Image 4 & 5).

It made sense to include the roads within the Pooitjiespram area, as part of the study area. This is due to the fact, that the opening of area to mining will certainly include the expansion of the roads. Also the area directly adjacent to the terrace will be used for dumps, this includes the riparian area directly north of the terrace and the low foot hills directly south of the terrace (see Image 4 & 5).

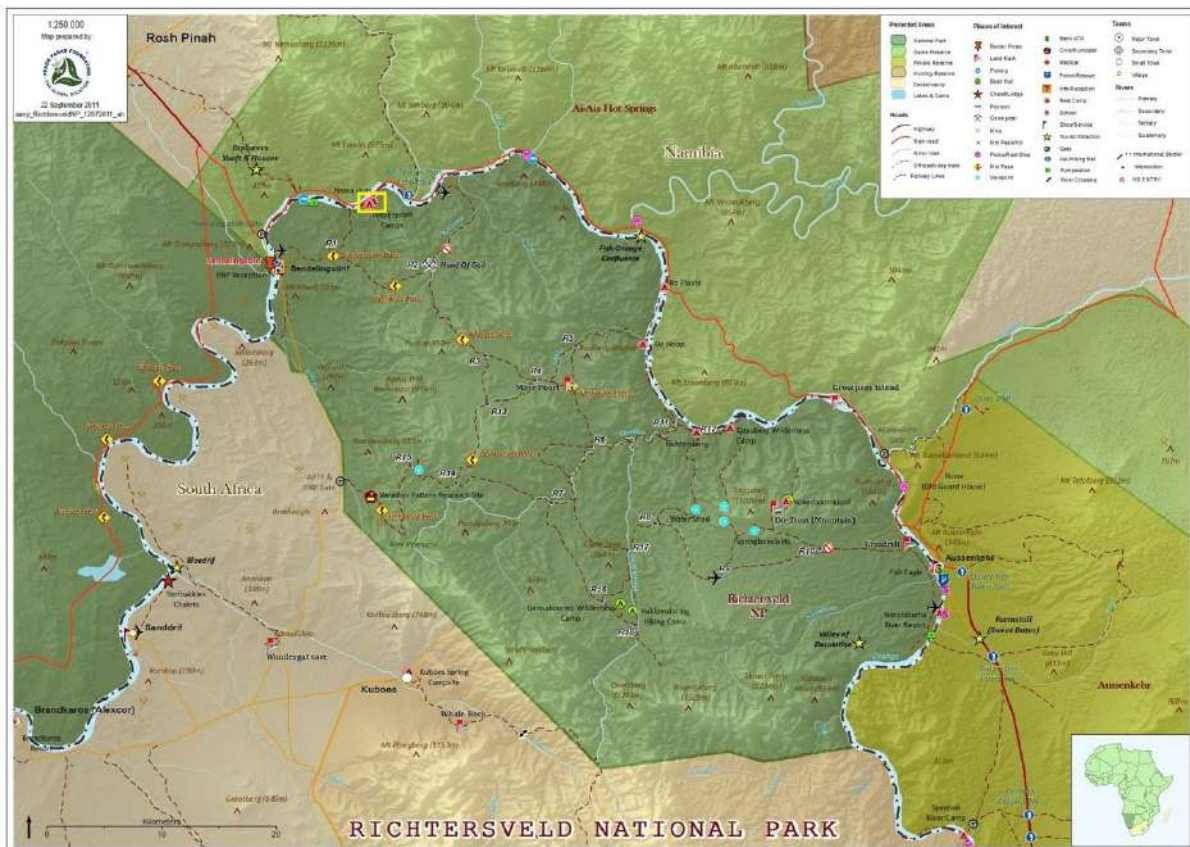


Image 3: Map of Richtersveld National Park, yellow square showing the study area.

Vegetation:

According to the Vegetation Types of South Africa, Lesotho & Swaziland (Mucina and Rutherford 2006) two vegetation types occurs at Pooitjiespram namely: Dg1 Noms Mountain Desert (Van Jaarsveld, 1981; Naußbaum, 2003, Jürgens 2004) and the AZa3 Lower Gariep Alluvial Vegetation (Acoks, 1979; Werger & Coetzee, 1977; Werger & Ellenbroek, 1978; Werger, 1980; Bezuidenhout, 1996; Bezuidenhout & Jardine, 2001; Jürgens, 2004).



Image 4: Google earth image; Red line indicating the Meso-Orange River Terrace, which is the main focus of this study; Yellow line, showing the close proximity of the largest Orange River Riparian vegetation found within the Richtersveld National Park.



Image 5: Green line = existing roads; Circles = livestock posts; Square A-D = Richtersveld National Park campsites, and the Redline, the terrace and core area which will be mined.



Image 6: Traditional Nama livestock post at Pootjiespram.



Image 7: From: *The Vegetation of South Africa, Lesotho and Swaziland*, Strelitzia 19 (2006), showing the vegetation types within the park. The yellow square indicates the study area.

Methods and Material:

Plants – Pieter Van Wyk: data collection was done from the years 2013 until 2020. Detail was gathered by taking photos of species, together with GPS. All species has been identified, and photos are stored taxonomically, and were used to create a photographic herbarium. Encase species could not be identified, using photos; herbarium collections were made. When voucher specimens were collected, the following information was also collected using a standard Herbarium Collection Form: GPS coordinates, Altitude, Vegetation Type, Substrate, Moisture regime, Soil type, Lithology, Exposure, Aspect, Slope, Biotic effect and Plant Features which included: growth form, height, flowering or fruiting. Living vouchers were given labels and grown at the Richtersveld National Park Nursery. Herbarium voucher of plants were pressed, frozen at -15°C after which it was dried at 65°C. Plant species identification was done by comparing herbarium material at Compton, Bolus, Stellenbosch, KSAN, Kimberley, SANParks and SANBI, Pretoria Herbariums. A Nikon SMZ800 micro scope was used to examine finer detail. Encase of problematic species, second opinions were obtained from several specialist.

Spiders & Scorpions – Pieter Van Wyk: data collections were done in 2014. Details were gathered by taking photos of species, together with GPS. Scorpions were searched for by using UV light, and spiders as well scorpions were searched for by looking under rocks and recorded also when viewed moving around. All species has been identified up to family level at least. Encase needed, specimens was made. They were collected together with general description of habitat and GPS, frozen at -10°C and directly afterwards stored in air tight containers, completely submerged in 85% ethanol. The specimens were handed to SANParks Scientific Services to distribute to the necessary specialist for identification.

Rodents – Pieter Van Wyk: data collections were done for 5 days in 2014 by putting out non-hazardous traps using different bait. In total 20 traps were used with the following bait: 10 with dried meat, bones, and salty cracks; 5 with sweet biscuits and honey; and 5 with seeds and nuts. The placement of the traps was marked with GPS, the date and time, and time of checking. The surveys were done during the day and night, to ensure quick release and less stress on animals.

Animals & Birds – Pieter Van Wyk: Day and Night surveys was done, at night using a strong spot light with binoculars, this was especially used for geckos, as their eyes reflect, when looking through binoculars and shining a spotlight on them. The species were photographed, if not known, and possible, to identify afterwards, using guides and contacting specialist if needed. The survey was done for 5 days.

Tourism Statistics – Briston Adams & Brent Whittington: Data was obtained by pulling the statistics from the SANParks Intranet. A period of three years was chosen as sample size. This can be done for all formal facilities individually by following the links, showcased in Image 8.

People & Conservation Statistics – Aletta Links & Brent Whittington: data was obtained, by and from, the Richtersveld National Park People and Conservation Officer. A study sample of 3 years were chosen, 2017-2019 (Chart 1).

Orange River Vegetation – Dr Hugo Bezuidenhout

In the reconnaissance it was decided that, due to time constraints, we will only look at the vegetation structure of the river bank (closed woodland) and the floodplain (sparse woodland) vegetation of the river, which refer to the System B (Hydro-riparian system) of Van der Riet (2004) (Figure 1). Photographs of different height classes of different woody plant species were taken. A belt transect was done in each of the different terrain units (floodplain and river bank), with different utilizations. The belt transect for the river bank was 20 meter long and 10 meter wide with four quadrants of 5 meter by 10 meter. The belt transect for the floodplain was 40 meter long and 5 meter wide with eight quadrants of 5 meter by 5 meter. All transects were done parallel to the Orange River.

Other Material used, not mentioned above includes: 50 meter measure tape, 100 meter rope, camera, one meter long stick and a two meter stick, herbarium press with flimsy, mouse traps (save ones, with trap door system), plastic buckets for spiders and insects, binoculars, uv-light.

Conservation Status – Pieter Van Wyk & Domitilla Raimondo

Was obtained by searching the SANBI Red List for each species (<http://redlist.sanbi.org/>). The comparison of impact on vegetation units was made by comparing the Boegoebaai Port Project plan with the vegetation map, within the (Vegetation of South Africa, Lesotho and Swaziland, 2006, Strelitzia 19) and consulting with SANBI.

Results:

The Meso-Orange River Terrace at Pooitjiespram, was found to be the last almost, untouched alluvial terrace of its type within the Richtersveld National Park. In total 73 plant taxa was recorded of which 5 species has special conservation status, on the SANBI Red Data List. Three more species were found to be also of conservation concern, and need special updating of their Red Data Status (Table 1 & 2). Two first plant records were made for South Africa, and it was found that Pooitjiespram is currently the only known locality where *Eriospermum rautanenii* is found and the Pooitjiespram Meso-Orange River Terrace is currently the only known locality where *Drimia oliverorum* is found, both within South Africa (Annexure A). A strange new rare form of *Cyanella ramosissima* which is also listed as Vulnerable on the SANBI Red List was found on the Pooitjiespram Meso-Orange River Alluvial Terrace (Table 2 & Annexure B). They are only one small population of *Ammocharis longifolia* found within the Richtersveld National Park. The population has a mere 31 individuals, growing on both sides of the road that leads to the mining area (Image 9). Even though the species does not have a special conservation status, it is still of conservation concern for SANParks, as it is the only population within the park. The broadening of the road towards the mine, could potentially lead to the permanent loss of the species within the Richtersveld National Park. The close proximity of the mine to the largest patch of Lower Orange River Alluvial Vegetation, was also found, to potentially be devastating, as this vegetation type is already considered as endangered.

In total 10 vertebrate taxa was recorded of which one species, *Bitis xeropaga* is of importance, as it is a regional endemic (Table 3). In total 16 invertebrate taxa was recorded (Table 4).

The mining of the Pooitjiespram Meso-Orange River Terrace, will lead to the closure of the Pooitjiespram Campsite. The Noise Pollution will go completely against, what SANParks stands for and offers to visitors. The closure of the campsite will have a major impact on the Richtersveld National Parks revenue made from camping, with an estimated figure of 10-15% camping-revenue loss (Image 8). Also it was found that there has been a steady increase in community programs and camps under the People & Conservation department of the Richtersveld National Park, at Pooitjiespram. It is the only camp which accommodate this critical important project, as it engage the local community with nature, and are the main source of environmental education for the Richtersveld community. Discussion amongst management within the Richtersveld National Park, found that the movement of heavy medium trucks, will have a major safety risk on visitors at the campsite as well the local Nama livestock farmers.

The close proximity to the Orange River, especially the Lower Orange River Alluvial Vegetation, will be negatively impacted, by water attraction, broadening of roads and dust pollution from the mine dumps and trucks.

Species Checklist

(Table 1)
Checklist of plant taxa observed with Least Concern Red Data Status

Scientific Names		
<i>Aloe gariepensis</i>	<i>Chrysocoma puberula</i>	<i>Limeum aethiopicum</i> var. <i>lanceolatum</i>
<i>Aloidendron dichotomum</i>	<i>Dicoma capensis</i>	<i>Hermannia gariepina</i>
<i>Trachyandra bulbifolia</i>	<i>Didelta carnososa</i> var. <i>carnososa</i>	<i>Grielum humifusum</i>
<i>Trachyandra muricata</i>	<i>Eriocephalus pedicellaris</i>	<i>Dyerophytum africanum</i>
<i>Albuca longipes</i>	<i>Foveolina dichotoma</i>	<i>Gaillonia crocyllis</i>
<i>Dipcadi brevifolium</i>	<i>Gazania lichtensteinii</i>	<i>Kohautia caespitosa</i> subsp. <i>brachyloba</i>
<i>Cenchrus ciliaris</i>	<i>Gorteria diffusa</i> subsp. <i>diffusa</i>	<i>Anticharis scoparia</i>
<i>Enneapogon desvauxii</i>	<i>Helichrysum gariepinum</i>	<i>Peliostomum virgatum</i>
<i>Enneapogon scaber</i>	<i>Helichrysum herniarioides</i>	<i>Forsskaolea candida</i>
<i>Pentameris airoides</i> subsp. <i>airoides</i>	<i>Osteospermum microcarpum</i>	<i>Forsskaolea hereoensis</i>
<i>Schismum schismoides</i>	<i>Osteospermum polycephalum</i>	<i>Chascanum garipense</i>
<i>Stipagrostis ciliata</i> var. <i>capensis</i>	<i>Othonna opima</i>	<i>Sisyndite spartea</i>
<i>Stipagrostis obtusa</i>	<i>Trichodesma africanum</i>	<i>Tetraena microcarpa</i>
<i>Tribolium utriculosum</i>	<i>Heliophila deserticola</i> var. <i>deserticola</i>	<i>Tetraena patenticaula</i>
<i>Galenia crystallina</i> var. <i>crystallina</i>	<i>Cleome foliosa</i> var. <i>lutea</i>	<i>Tetraena prismatocarpa</i>
<i>Sesuvium sesuvioides</i>	<i>Portulacaria fruticulosa</i>	<i>Tetraena</i> sp. nov. <i>segmentatum</i>
<i>Trianthema parvifolia</i> var. <i>rubens</i>	<i>Euphorbia rhombifolia</i>	<i>Tetraena</i> sp.
<i>Caroxylon</i> sp.	<i>Mesembryanthemum nucifer</i>	<i>Tribulus cristatus</i>
<i>Searsia populifolia</i>	<i>Indigastrum argyroides</i>	
<i>Hoodia gordonii</i>	<i>Indigofera hololeuca</i>	
<i>Microloma incanum</i>	<i>Indigofera pungens</i>	
<i>Orphanthera albida</i>	<i>Tephrosia dregeana</i>	
<i>Amellus nanus</i>	<i>Gisekia africana</i>	
Total Taxa:	64	

(Table 2)
Taxa of Conservation Concern (with their SANBI Red Data Status)

Scientific Name	Status	Criteria
<i>Namaquanula bruce-bayeri</i>	Critically Endangered	C2a(i)
<i>Eriospermum rautanenii</i>		
<i>Cyanella ramosissima</i>	Vulnerable	B1ab(iii,v)+2ab(iii,v)
<i>Cephalophyllum herrei</i>	Vulnerable	B1ab(iii,v)
<i>Portulacaria pygmaea</i>	Endangered	B1ab(iii,v)
<i>Lotononis strigillosa</i>	Near Threatened	B1ab(iii,v)
<i>Lotononis</i> sp. nov.		
<i>Drimia oliverorum</i>		
Total Red Data Taxa:	5	
Total Taxa of Conservation Concern:	8	
Total Taxa of plants including Table 1 & 2:	73	

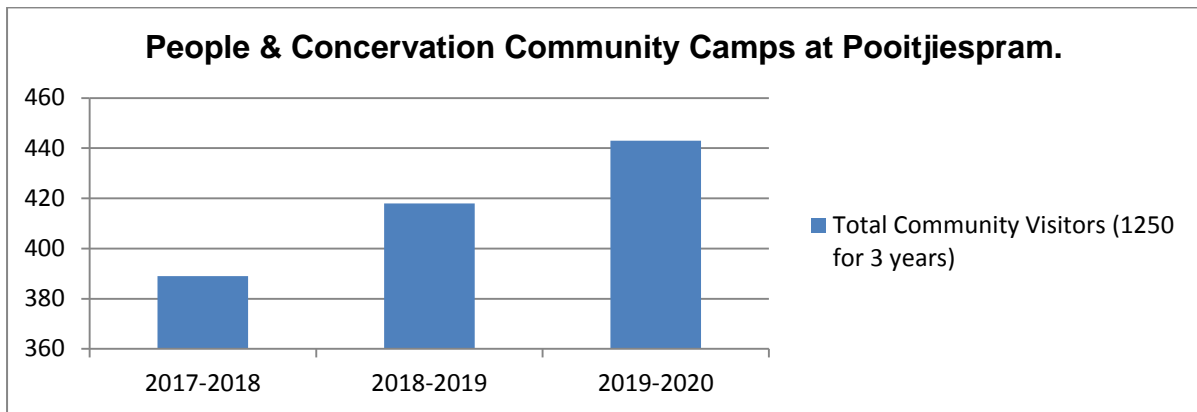
(Table 3)
Vertebra Taxa Recorded with their status

Scientific Name	Status	Notes
<i>Pachydactylus atorquatus</i>	LC	
<i>Pachydactylus carinatus</i>	LC	
<i>Chondrodactylus angulifer</i>	LC	
<i>Bitis xeropaga</i>	LC	Regional Endemic
<i>Bitis caudalis</i>	LC	
<i>Psammophis namibensis</i>	LC	
<i>Meroles suborbitalis</i>	LC	
<i>Desmodillus auricularis</i>	LC	
<i>Pronolagus rupestris</i>	LC	
<i>Calendulauda albescens</i>	LC	
Total Taxa:	10	

(Table 4)
Invertebrate Taxa Recorded with their status

Scientific Name	
<i>Oxypilus</i> sp.	<i>Curculionidae</i> sp.
<i>Browns desert mantid</i>	<i>Eumeta</i> sp.
<i>Pamphagid</i> sp.	<i>Solifugid</i> sp.
<i>Conistica saucia</i>	<i>Parabuthus villosus</i>
<i>Schistocerca gregaria</i>	<i>Parabuthus granulatus</i>
<i>Nemia costalis</i>	<i>Opisththalmus carinatus</i>
<i>Anthia</i> sp.	<i>Sparassid leucorchestris</i>
<i>Eurychora</i> sp.	
<i>Somaticus aeneus</i>	
Total Taxa:	16

(Chart 1)



Camp	Accommodation Type Description	No of Guests
POTJIESPRAM CAMP SITE	CAMPING	
	CK6 (CAMP SITE)	3061
	TOTAL:	3061
	CAMP TOTAL:	3061
	GRAND TOTAL:	3061

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Image 8, SANParks intranet, statistics of bookings for Pootjiespram Campsite over a period of 3 years, 2017-2019.



Image 9: Google earth, road to mine, red marked area showing the locality where *Ammocharis longiflora* grows.

Conclusion:

Pooitjiespram is an important area for biodiversity within the Richtersveld National Park, and should be protected. The opening of the area for mining will have a devastating socio-ecological impact. No consultation has been done in the past by the mine, or at present, with the local semi-nomadic Nama Livestock Farmers within the Richtersveld National Park. Evidence of their existence within the park dates back to 3 000 years ago (Webley 1997). The mining will cause the only known population of *Drimia oliverorum* to go extinct within South Africa and may lead to the loss of the only *Ammocharis longiflora* population within the Richtersveld National Park. Also should Pooitjiespram be mined, it will lead to the closure of the locality as a campsite which will have a major impact on the Richtersveld National Park.

Acknowledgements:

Special thanks to Mr B. Whittington, Richtersveld National Park Manager, Mrs A. Links People & Conservation Officer, for providing statistics on community camps held at Pooitjiespram. Also special thanks to Mr B. Addams for providing statistics on tourism revenue from camping within the park, and the impact the mine will have on tourism. Special thanks to Mr M. Joseph & Miss E. Stanford for assisting with data collection of biodiversity at the site, and assessing the *Drimia oliverorum* population. Special thanks to Dr J. Manning for identifying *Eriospermum rautanenii* and *Drimia oliverorum* and to Dr H. Bezuidenhout for results on Orange River Vegetation.

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Plant Jstore Online Herbarium
 Compton Herbarium (SANBI)
 Bolus Herbarium (SANBI)
 National Herbarium (SANBI)
 Kimberley SANParks Herbarium
 Karoo Namib Herbarium University of Hamburg

Annexure: A



Eriospermum rautanenii Schinz; ERIOSPERMACEAE; PC2374; 04/05/2020; Pooitjiespram; GPS: 28°04.04.86"S 016°58.23.99"E; Alt. 74m. Description: A deciduous herbaceous geophyte, with underground tubers. Leaf is mostly single, dark green, pressed on the ground or suberect, ovate, leathery, smooth, the margins entire; it can grow up to 7cm long, dying before flowering. Flowers are white, with a green stripe in the middle of the petals, borne in a dense, short raceme. Flowering December to May. Distribution: Previously known only in Namibia and Angola. Found amongst alluvial deposits on the Pooitjiespram Meso-Orange River Terrace and surroundings. Abundant.



Drimia oliverorum J.C. Manning (Urgineodeae); Hyacinthaceae; PC2558; 31/08/2020; Pooitjiespram; GPS: 28°04.04.86"S 016°58.23.99"E; Alt. 74m. Description: A perennial, deciduous herbaceous geophyte that can grow up to 8cm tall, with a small bulb. The lower part of the stem is covered with papery sheaths. Leaf is ovate, striped and softly hairy above; it can grow up to 2cm long, and is absent at flowering. Flowers are white, light brown to creamy or slightly greenish, with a brownish stripe in the middle of the petals, borne slightly nodding on flaccid, branched pedicles, the petals recurved; they can grow up to 8mm in diameter. Stamens grow spreading outwards. Opening during the day. Flowering December to January. Distribution: A very rare species, known from only two plants collected in Namibia previously. Found amongst alluvial deposits on the Pooitjiespram Meso-Orange River Terrace.

Annexure: B

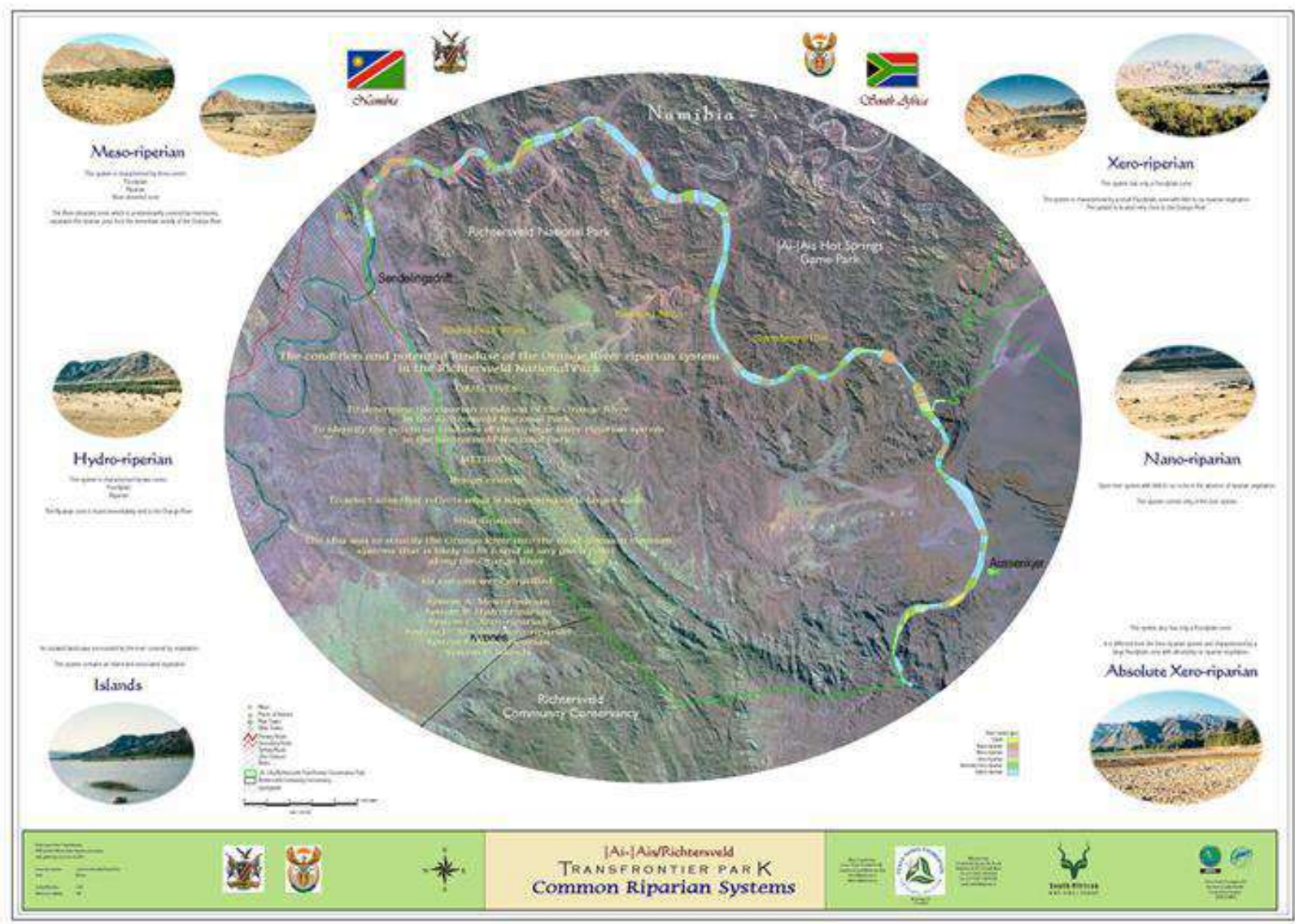


Cyanella ramosissima (Engl. & K.Krause) Engl. & K.Krause; TECOPHILAEACEAE; PC2654; 31/08/2020; Pooitjiespram; GPS: 28°03.58.07"S 016°58.26.09"E; Alt. 73m. Description: A perennial, deciduous herbaceous geophyte that can grow up to 10cm tall, with a corm. Leaves are lanceolate, curled, hard, smooth or corrugated, glabrous, the margins entire; they can grow up to 8cm long. Flowers are fragrant, pink to bluish, borne on suberect pedicels; they can grow up to 2cm in diameter. Stamens are yellow. Anthers are 3 upper and 3 lower; the upper median anther is larger than the upper laterals. Filaments are partially fused. The style is longer than the lower stamens. Flowering July to September. This species is unusual, in its very long, shiny green leaves, tall inflorescence, and the first record of the species with white flowers. Previously the species was known to have only mauve to light magenta flowers (see Image below) Distribution: previously known from 6 localities within the Richtersveld National Park, of which the closes record is at Vyf Susters 5km south of Sendelingsdrif. Found amongst alluvial deposits on the Pooitjiespram Meso-Orange River Terraces.



Cyanella ramosissima from Baken Mine, on the left, and from Vyfsusters in the Richtersveld National Park, picture on the right, both showing the normal low growth form of the species and light purple flowers.

Annexure: C



/Ai-/Ais Richtersveld Transfrontier Park and the location of the Orange River in the Park (Van der Riet 2004).

BLSA Comments: Samara Mining Prospecting Applications (PR 12663, 12664)

Melissa Lewis <Melissa.Lewis@birdlife.org.za>

Tue 12/15/2020 1:57 PM

To: Marissa Botha <botham@naledzi.co.za>

Cc: Bronwyn Maree <Bronwyn.Maree@birdlife.org.za>

 1 attachments (344 KB)

BLSA COMMENTS_NCS 50 5 1 1 2 1 (12664 & 12663) PR.pdf;

Dear Marissa,

Many thanks for arranging yesterday's stakeholder meeting regarding Samara Mining's applications (PR 12663, 12664).

Attached, please find BirdLife South Africa's comments on the draft scoping reports for these applications.

In addition to yesterday's overview of the draft scoping reports, we followed with great interest the applicant's presentation on its social development plan. We are pleased that such a plan is envisaged, and would like to raise the following points and suggestions for the applicant's consideration:

1. It was noted that small enterprise development will occur, with artisanal miners and small scale farmers being provided land, equipment and support to enable their development. It will be important to also consider the environmental impacts of these activities and allow stakeholders to comment on these ahead of the plan's finalisation and implementation (of course, to the extent that the developments envisaged involve activities included in Listing Notices 1-3, environmental authorisations will be a legal requirement).
2. In terms of the social development and increased education and awareness activities discussed, we noted that there was no mention of any environmental education, skills development or awareness. We feel this is a key element that should be included.

Kind regards,

Melissa

Dr Melissa Lewis
Policy and Advocacy Programme Manager
BirdLife South Africa
E-mail: melissa.lewis@birdlife.org.za

15 December 2020

Ms Marissa Botha
Naledzi Environmental Consultants Pty Ltd
16 Marshall Street
Polokwane
0700

Attention: Marissa Botha
Email: botham@naledzi.co.za

Dear Ms Botha,

COMMENTS ON DRAFT SCOPING REPORTS: Environmental Impact Assessment (EIA) process and Water Use License Application (WULA) for the two alluvial diamond prospecting right applications with bulk sampling by Samara Mining Pty Ltd on the left bank of the Orange River near Sendelingsdrift, Richtersveld, Namaqua District of the Northern Cape Province.

**DMRE REFS: NCS 30/5/1/1/2/1 (12664) PR
NCS 30/5/1/1/2/1 (12663) PR**

Thank you for informing us of the above-mentioned processes and providing us an opportunity to comment thereon. BirdLife South Africa is a non-governmental organisation that focuses on and is concerned about the conservation of birds, their habitats and biodiversity. We recognise the need for economic development, including responsible mining. We do not, however, support developments that may have a significant negative impact on the country's bird species, the habitats they rely on, and natural water sources.

Prospecting right application area 2 (PRAA 2)

BirdLife South Africa is emphatically opposed to the application to prospect in PRAA 2 insofar as this area falls within a national park and world heritage site. The draft scoping report correctly highlights that prospecting in these types of protected areas is prohibited by law. **Importantly, the National Environmental Management: Protected Areas Act 57 of 2003 allows no exemption to this prohibition. Moreover, regulation 22(b)(i) of the Environmental Impact Assessment Regulations (2014) specifies that a competent authority *must*, within 43 days of receipt of a scoping report, refuse environmental authorisation if “the proposed activity is in conflict with**

a prohibition contained in legislation". If granted, any authorisation to prospect within PRAA 2 would, in all likelihood, be overturned if taken on appeal or judicial review. **We therefore strongly urge the Department of Mineral Resources and Energy (DMRE) not to allow this application to proceed beyond the scoping phase.**

Comments applicable to both draft scoping reports

BirdLife South Africa has several additional concerns and recommendations regarding the draft scoping reports. These comments should not be interpreted as suggesting that we in any way support the application proceeding in respect of PRAA 2. As highlighted above, this application should not be permitted to proceed to a full environmental impact assessment (EIA). Nevertheless, until such a decision has been made by DMRE, the following should be taken into account for both reports:

1. The draft scoping reports make little mention of the reports generated by the national web-based environmental screening tool. Nor do their sections on Policy and Legislative Context mention which theme-specific protocols¹ will govern specialists' assessments and reports during the EIA phase. **Please could the final reports elaborate on which environmental themes the screening tool has identified as relevant for these applications and which protocols will consequently be applicable.**
2. The Orange River Mouth is a Wetland of International Importance that currently sits on the Ramsar Convention's Montreaux Record. **If the EIA concludes that prospecting has the potential to further degrade this site, or to impede the restoration of its ecological character, it is strongly arguable that this should be considered a fatal flaw.** Notably, the South African government's most recent report to the Conference of the Parties to the Ramsar Convention identified the removal of the Orange River Mouth from the Montreaux Record as being a priority for our country.² Authorisation should not be granted for activities that would frustrate the attainment of this objective and contravene Article 3(1) of the Convention.

¹ See Government Notice No. 320 in Government Gazette 43110 of 20 March 2020; and Government Notice No. 1150 in Government Gazette 43855 of 30 October 2020. As regards the latter, please note that the Draft Species Environmental Assessment Guideline (mentioned in footnote 4 of the Biodiversity Scoping Report) has now been finalized and is available from the South African National Biodiversity Institute.

² *National Report of the Implementation of the Ramsar Convention on Wetlands* (2018), https://www.ramsar.org/sites/default/files/documents/importftp/COP13NR_South%20Africa_e.pdf.

3. In assessing potential impacts on the Orange River Mouth within the context of South Africa's obligations under the Ramsar Convention, consideration needs to be given to the criteria that justified this estuary's designation as a Ramsar Site. **South Africa's justification for the site's designation relied heavily on its importance for numerous species of waterbirds.**³ The site is regarded as the second most important estuary in South Africa in terms of its conservation importance, and is used primarily for breeding and as a stop-over on migration. Unfortunately, migrant numbers are already lower than they were in the past, and the further degradation of an important stop-over point would likely place additional stress on these species. Indeed, there is already a lack of large wetland systems on this coast, with the next closest options being Walvis Bay in the north and Olifants River in the south. The Orange River Mouth also supports several species of birds which are listed on the Namibian, South Africa or international red data books (such as the Damara Tern). **This aspect has received insufficient emphasis in the draft scoping reports. Moreover, the reports have not mentioned that the Orange River Mouth is an Important Bird and Biodiversity Area (IBA) in danger,**⁴ **or that many of the species it supports are covered by the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA).**⁵ As a Contracting Party to AEWA, South Africa is internationally obliged to maintain these species at, or restore them to, a favourable conservation status. However, the Agreement currently receives no mention in the reports and our understanding after liaising directly with the AEWA Secretariat is that they have not received notification of this application. Please can this be rectified. Note further that **some of the species of conservation concern expected to occur within the project's area of influence (e.g. the Lappet-faced Vulture) are listed under the Convention on the Conservation of Migratory Species of Wild Animals (CMS).**⁶ This Convention is therefore also relevant.

4. Given the importance of the Orange River Mouth from a species-conservation perspective, it is essential that the **estuary be considered not only in the Freshwater Ecological Impact Assessment, but also in the full Biodiversity Impact Assessment, with impacts on avifauna being assessed by an avifaunal specialist.** Indeed, best practice dictates that **species impact assessments investigate all project areas of influence, not**

³ <https://rsis Ramsar.org/RSapp/files/RSrep/ZA526RIS.pdf>.

⁴ BirdLife International Data Zone, *Orange River Mouth Wetlands*, <http://datazone.birdlife.org/site/factsheet/orange-river-mouth-wetlands-iba-south-africa>.

⁵ AEWA, <https://www.unep-aewa.org/en/documents/agreement-text>.

⁶ CMS, <https://www.cms.int/en/convention-text>.

only the prospecting focus areas. If the Terrestrial Animal Species Protocol is applicable, then consideration of project areas of influence is a legal requirement.

5. We note that, although the draft scoping reports raise several concerns regarding habitat loss, little is said regarding other potential impacts on species, such as disturbance. It is important that the EIA **investigate all potential direct and indirect impacts of the proposed prospecting and its associated infrastructure on species of conservation concern and that the mitigation hierarchy be carefully applied.**
6. The scoping reports assert that many of this project's negative impacts can be addressed through rehabilitation. We question the confidence with which the reports promote such a measure – especially in light of these areas' high ecological sensitivity and importance. If rehabilitation is to be proposed as a mitigation measure, **it is essential that the EIA includes a rigorous assessment of the rehabilitation methods available and their likelihood of successfully rehabilitating impacted areas to a pre-disturbance state. Any predictions regarding the effectiveness of rehabilitation/restoration need to be supported by evidence.** If this is not possible, it cannot simply be assumed that rehabilitation will be effective.
7. BirdLife South Africa objects to any prospecting being authorised within Critical Biodiversity Areas (CBAs) that are classified as irreplaceable. Prospecting with the intention to mine is clearly incompatible with conserving these areas and, given that they are irreplaceable, their loss cannot be remediated through biodiversity offsets. **Should the presence of CBA1 areas be confirmed during the EIA, we urge that this be considered a fatal flaw.**
8. Given the impacts that mining activities are already having on the Orange River, it is essential that the EIA carefully assesses cumulative impacts. **The draft scoping reports are currently silent on how cumulative impacts will be assessed. Please could this be elaborated upon in the final reports.**
9. We understand that the applicants are still in the process of refining their prospecting methods and design. From the stakeholder engagement that has occurred thus far, our understanding is that these details will be finalized in time to inform the full EIA, the drafting of the Environmental Management Programme, and the compilation of the water use licence application. **We request that the draft EIA report include a comprehensive description of the proposed methods (including, for instance, specifics**

regarding the amount of water that will be abstracted and details of the water diversions) to enable interested and affected parties (I&APs) to properly review the report's impact assessment and proposed mitigation measures.

10. Finally, we are concerned by the proposal that prospecting activities occur within the 1:50 and 1:100 year flood line of the Orange River. Our understanding from the stakeholder meeting on 14 October 2020 is that the application for an exemption from the requirements in regulation 4 of the Regulations on Use of Water for Mining and Related Activities Aimed at the Protection of Water Resources (1999) will be submitted with the water use licence application and that I&APs will be afforded an opportunity to comment thereon. We look forward to reviewing the draft application and supporting documentation in due course.

Yours sincerely,



Dr Melissa Lewis
Policy and Advocacy Programme Manager
BirdLife South Africa

Our Ref:



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CaseID: 15799

Date: Friday December 11, 2020
Page No: 1

Interim Comment

In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Samara Mining Pty Ltd

Prospecting right application with bulk sampling on the left bank of the Orange River boundary to Portion of the Remainder of the Farm No. 18, Richtersveld, Namaqualand, Northern Cape Province, South Africa. The prospecting right application area (PRAA) is 690 Ha in extent.

Naledzi Environmental Consultants (Pty) Ltd has been appointed to conduct an Environmental Authorisation (EA) Application for proposed prospecting activities on the left bank of the Orange River boundary to Portion of the Remainder of the Farm No. 18, Richtersveld, Namaqualand, Northern Cape Province, South Africa for Samara Mining (Pty) Ltd (NC30/5/1/1/2/12663 PR).

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 EIA Regulations for activities that trigger the Mineral and Petroleum Resources Development Act, 2002 (MPRDA)(As amended). The proposed prospecting will include 10 trenches from three separate areas along the river, and associated processing infrastructure

Dr Durand and Millenium Heritage Group (Pty) Ltd have been appointed to provide heritage specialist input into the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) and 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

Durand, J. F. 2020. Palaeontological Desktop Study: Prospecting rights application on the bank of the Orange River at Namaqualand in the Northern Cape.

The proposed prospecting area is underlain by the Gariep Supergroup that may contain stromatolites and microfossils, the Namaqua-Natal rocks that do not contain fossils and the Quaternary sediments that may contain root casts, burrows, termitaria, ostrich eggshells, mollusc shells and isolated bones. A Chance Finds Procedure is recommended to be followed and is provided in the report.

Millenium Heritage Group. 2020. Desktop Study of the Cultural Heritage Resources of northwestern Richtersveld, for Two Proposed Prospecting Rights Applications for Alluvial Diamond Mining along the Orange River in Namaqualand, Northern Cape, South Africa.

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CaseID: 15799

Date: Friday December 11, 2020
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The desktop study has noted that several heritage resources may be present within the proposed prospecting area, including Stone Age lithics, middens, rock engravings, graves, historical buildings and places of conflict. It is noted that a field assessment HIA will be conducted as part of the EIA phase of the EA application.

Interim Comment

SAHRA notes that a field based HIA will be conducted as part of the EIA phase. The pending HIA must comply with section 38(3) of the NHRA. The assessment of archaeological resources must be completed by a qualified archaeologist comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports. Please ensure that the specialists names are provided in the report (no name has been provided on the Heritage Desktop report). Additionally, please ensure that the HIA is application specific i.e. please do not combine two prospecting rights applications in one report.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.

Further comments will be issued upon receipt of the above requested report and the draft EIA and appendices. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

PRAA 2_PR 12663 Alluvial Diamond Prospecting Right with Bulk Sampling on left bank of Orange River

Our Ref:



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CaseID: 15799

Date: Friday December 11, 2020
Page No: 3

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/546006>
(DMR - NC, Ref: NCS 30/5/1/1/1/2/1 (12663) PR)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

COMMENT SHEET FOR DRAFT SCOPING REPORTS

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA)
APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS
WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE
RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT
OF THE NORTHERN CAPE PROVINCE

Prospecting Right Application Area (PRAA)	DMR Reference Number	Property
PRAA 1	NCS 30/5/1/1/2/1 (12664) PR	Left bank of the Orange River boundary to Portion of Remainder of Farm Richtersveld No. 11
PRAA 2	NCS 30/5/1/1/2/1 (12663) PR	Left bank of the Orange River boundary to Portion of the Remainder of Farm No. 18

<p>EAP CONTACT INFORMATION: Naledzi Environmental Consultants Pty Ltd Suite #320, Postnet Library Gardens, Library Gardens, P/Bag X 9307, Polokwane, 0700 160 Marshall Street, Polokwane Tel: 015 296 3988 Fax: 015 296 4021 Cell: 084 226 5584 (Marissa) or 083 410 1477 (Desmond) Email: botham@naledzi.co.za or dmusetsho@naledzi.co.za</p>
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TITLE (Prof/Mr/Mrs)	PROF	FIRST NAME	DAVID
SURNAME	MORRIS		
CAPACITY (eg. Director/Secretary)	HEAD OF ARCHAEOLOGY / EXTRAORDINARY PROFESSOR		
ORGINASATION	MCGREGOR MUSEUM / SOL PLAATJE UNIVERSITY KIMBERLEY		
POSTAL ADDRESS	PO BOX 316 KIMBERLEY	POSTAL CODE	8300
TEL NO:	053-8392700	CELL NO:	082 2224777
FAX NO:		EMAIL ADDRESS:	dmorriskby@gmail.com
APPLICATION AREA TO WHICH YOUR COMMENT RELATES: (Please tick box)	PR 12664 – PRAA 1	PR 12663 – PRAA 2	ALL :

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

- The dates here (from the Heritage Scoping Report) are wrongly quoted: “Excavations at Spoegrivier confirmed that the lower layers, with dates of 3520750 BP (Pta-6754) and 3580760 BP (Pta-6987), predated sheep and/or pottery (Webley, 2001).”
- The McGregor Museum as provincial museum for the Northern Cape should have been consulted for records/insights concerning the area.
- The Department of Sport Arts and Culture Northern Cape and its Heritage Unit and/or Northern Cape Heritage Resources Authority must be consulted as authorities mandated to assist in management of the universal values recognised in the area’s listing as World Heritage. The Department was lead agent in the World Heritage listing.
- The McGregor Museum was contacted in connection with the public consultation period on 9 December 2020. This was *very late* in the process, hence delay in responding by 14/15 December 2020.
- I enquired at the Northern Cape Heritage Resources Authority and they apparently had heard nothing about this proposed project up until 14 December 2020 (when I provided minimal information on it – and they were not in a position to make reasonable comment). This is a major oversight by the applicant and their various consultants, especially the Heritage consultant. In light of this, receiving a written response from their office, *by whatever date*, must be regarded as a *sine qua non*.
- The McGregor Museum Archaeology Department has been involved in observing rock art occurrences and other archaeological traces along the west bank of the Orange River in this area and notes that previous mining has adversely impacted rock art sites and other materials there, and that the existence of graves adds to the exceptional sensitivity of the west bank of the Orange River in this area. These previous impacts should be documented as part of any impact assessment.
- We note that the period Jan-Feb 2021 is proposed for the carrying out of a heritage impact assessment along the proposed areas of impact: this assumes detailed on-the-ground evaluation of sites along the two stretches of river bank.
- Critical to understanding the heritage significance of the sites including the graves and other heritage traces along the bank of the river would be in-depth consultation with the community members who may have historical connections with the sites and who do have on-going management responsibility as the owners of the land. Evidence of this degree of consultation at the level of both scoping and on-site survey should be provided. It is not clear that any such consultation happened in the scoping phase.

NAME & SURNAME: **DAVID MORRIS**

DATE: **15 DEC 2020**

SIGNATURE: _____



Interested party.

Itumeleng Mashune <Itumeleng.Mashune@drdlr.gov.za>

Tue 11/17/2020 9:07 AM

To: Marissa Botha <botham@naledzi.co.za>

Good day sir

Please register myself as an interested party regarding the land in richtersveld no. 11

Kind regards

Itumeleng Mashune
Department Agriculture, Land Reform, Rural Development
0798760481/ 053 830 4000.

Sent from my Samsung Galaxy smartphone.



Richtersveld National Park
Address: PO Box 406
Alexander Bay
8290
Tel: 027 – 831 1506

E-mail: brent.whittington@sanparks.org

Date: 3 December 2020

Naledzi Environmental Consultants CC
160 Marshall Street
Polokwane
0700
South Africa

RE: DRAF SCOPING REPORT: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCESS AND WATER USE LICENSE (WULA) APPLICATION FOR THE TWO ALLUVIAL DIAMOND PROSPECTING RIGHT APPLICATIONS WITH BULK SAMPLING BY SAMARA MINING PTY LTD ON THE LEFT BANK OF THE ORANGE RIVER NEAR SENDELINGSDRIF, RICHTERSVELD, NAMAQUA DISTRICT OF THE NORTHERN CAPE

As an interested and affected party South African National Parks (SANParks) have been made aware of the proposed mining developments by Samar Mining within the greater Richtersveld.

Thank you for the opportunity to comment on the Scoping Report.

The Richtersveld National Park (RNP) was declared as a National Park in 1991 in terms of the National Parks Act No. 57 of 1976, (Government Gazette 13457, dated 16 Aug. 1991). The RNP is managed in accordance of a Management Plan approved by Minister Edna Molewa in terms of Sections 39 and 41 of NEM:PAA (Act no.57. of 2003).

- (i) SANParks legal mandate is to protect, control and manage National Parks and other defined protected areas and their biological diversity, (S17, NEMPAA, Act .57 of 2003).

addo elephant
agulhas
augrabies falls
bontebok
golden gate highlands
karoo
kgalagadi transfrontier
knysna lake area
kruger
mapungubwe
marakele
mountain zebra
namaqua
table mountain
tankwa-karoo
tsitsikamma
|ai-|ais/richtersveld
vaalbos
west coast
wilderness

(ii) Mining is prohibited in National Parks and its buffer zones due to its significant negative effects on the environment including the soil, water resources, geological stability, biodiversity and air quality and therefore SANParks remain opposed to mining in National Parks and its buffer Zones.

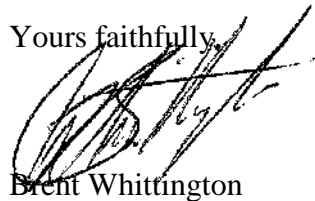
The RNP management Plan describe mining as a “threat” and the old Trans Hex Group (THG) mining areas are zoned as “mining rehabilitation areas”.

Due to the nature of the activities within the SANParks mandate, and the reason for the RNP’s proclamation, the current mining activities within the Park needs to be monitored closely in order to prevent any irreparable damage to cultural, conservation or tourism related matters, (in terms of guidelines, regulations and in liaison with the Minister of Environment, Forestry and Fisheries, (DEFF), Ms Barbara Creecy).

In light of the above information the following is to be noted:

SANParks do not support this application and reserves the right to revise initial comments based on additional information that may be received.

Yours faithfully,



Brent Whittington

PARK MANAGER RICHTERSVELD NATIONAL PARK: SANParks



LOWER ORANGE RIVER
DIAMONDS

Tuesday 15 December 2020

Naledzi Environmental Consultants (Pty) Ltd
160 Marshall Street
POLOKWANE

per e-mail: botham@naledzi.co.za
attention : Marissa Botha
dmusetsho@naledzi.co.za

cc:

The Regional Manager (Northern Cape)
Department Mineral Resources & Energy
KIMBERLEY
Department Mineral Resources & Energy
SPRINGBOK

ndlelenhle.zindela@dmr.gov.za

shishiwa.mukwevho@dmr.gov.za

Dear Sirs

DMR REF. NCS 30/5/1/1/2/1 (12664) PR

COMMENT AND OBJECTION TO PRAA 1 PROSPECTING AND BULK SAMPLING APPLICATION

With reference to the above, the area which is the subject matter of the application by Samara Mining (Pty) Ltd as referenced above, is part of the Mining Right Area of the existing Lower Orange River Diamonds (Pty) Ltd ("LOR") Mining Right, Cession of the earlier Trans Hex Group Mining Right with reference NCS 30/5/1/3/3/1 (531) MR, as evidenced by the hereto attached Regulation 2(2) sketch plan.

LOR reserves the right to submit and lodge further additional and comprehensive grounds of objection in the event that this objection as to overlapping is not upheld and the above application indeed proceeds.

Yours faithfully

Peter van Rooyen
Manager: Legal
(082-923 1815)
petervr@lor.co.za

Head Office: 1st Floor, Block B, De Wagenweg Office Park, Stellantia Street, Stellenbosch, 7600
Operational Address: Baken Mine, Lower Orange River Complex, Alexander Bay, Northern Cape, 8290
Postal Address: PO Box 31, Stellenbosch, 7600
Tel: 027 831 1495 Email: info@lor.co.za

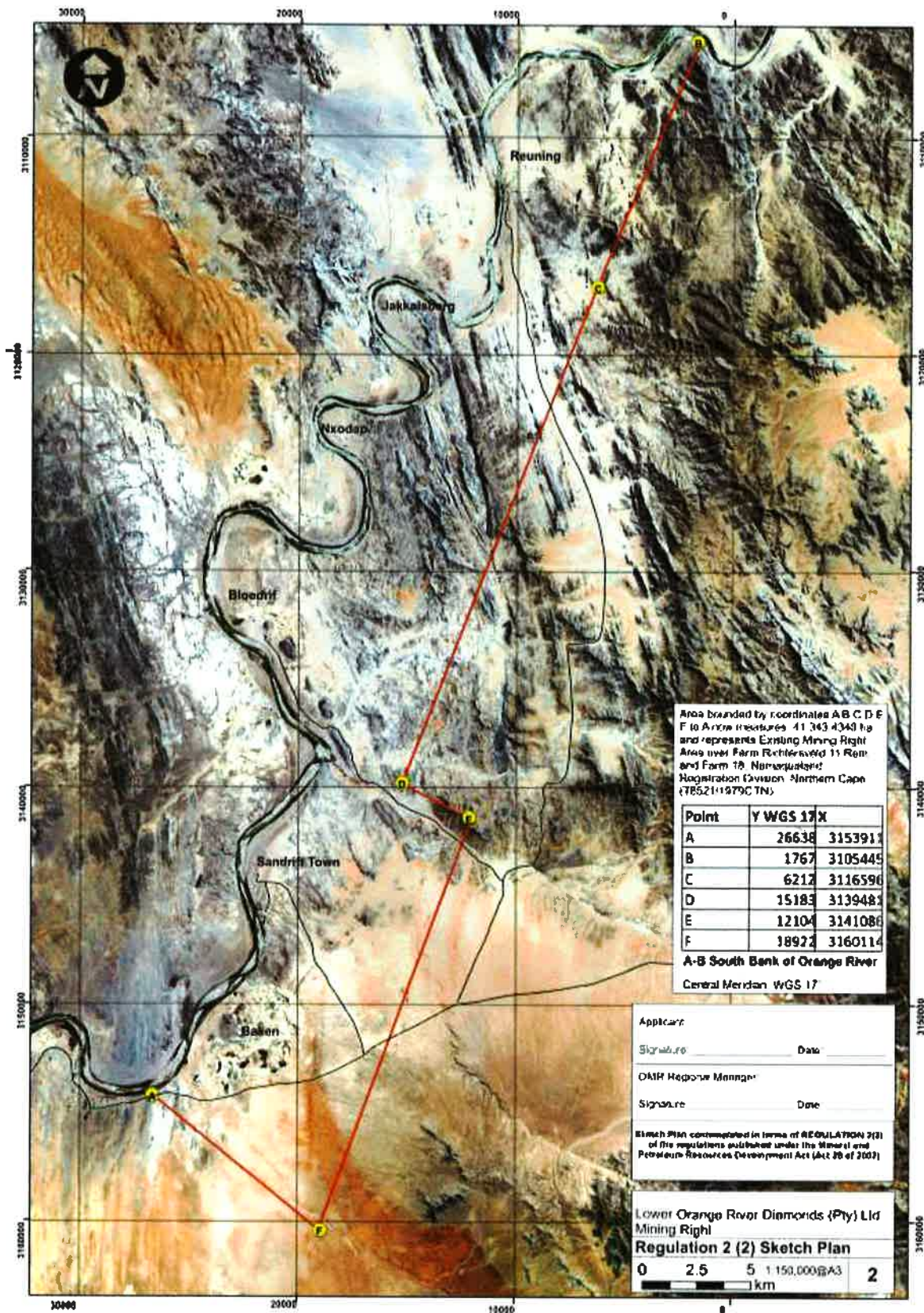


Figure 2: Regulation 2 (2) Sketch Plan