

Datum: 20 Januarie 2021

Aandag: Mnr Gert Cloete
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OMVANGSBEPALINGSVERSLAG: OMGEWINGSIMPAK STUDIE EN WATER LISENSIE AANSOEK VIR DIE VOORGESTELDE PROSPEKTEERREG - AANSOEKE VIR DIAMANTE OP DIE LINKER OEWER VAN DIE ORANJE RIVIER, RICHTERSVELD, NAMAKWA DISTRIK, NOORD-KAAP, SUID AFRICA

U kommentaar gedateer 14 Desember 2020 aangaande die bogenoemde projek hou verband;

Ons wil hiermee van die geleentheid gebruik maak om u te bedank vir u insette as deel van die publieke deelname proses. U kommentaar is aangeteken in the finale Omvangsbepalingsverslae wat voorgelê is aan die Departement van Minerale Hulpbronne en Energie (DMHE) te Springbok.

Elektroniese afskrifte van die finale Omvangsbepalingsverslae vir aansoek area 1 en area 2, soos voorgelê aan die DMHE, is beskikbaar vir aflaai en besigtiging op die Naledzi webtuiste op die volgende skakel: <http://www.naledzi.co.za/public-documents-naledzi.php>.

Die kommentaar wat u in die brief geopper het was nie genommer nie, so ons gee terugvoer volgens die paragrawe uiteengesit in die brief.

A. “Ons het nie die Scoping verslae, visuele scoping , Grondwater Scoping verslae of mynplanne en aanhangsels wat saam die aansoek gaan, gekry nie”.

1. Die “Scoping Reports” of te wel Omvangsbepalingsverslae, is vanaf 13 November tot 14 Desember 2020 elektronies beskikbaar gestel op die Naledzi-webwerf. Harde kopieë is by die volgende openbare biblioteke geplaas: Sanddrift, Kuboes, Lekkersing en Eksteenfontein asook by die Sanparke kantoor by Sendelingsdrift.
2. 'n Advertensie is op 13 November 2020 in the Gemsbok- en Plattelander Koerant gepubliseer.
3. Die Richtersveld Munisipaliteit het ook die kennisgewing geplaas op die ‘Richtersveld Nuus’ Facebook - blad en daar ook die verslae beskikbaar gestel vir aflaai.
4. Plakkate / Kennisgewings is ook in die gebied opgesit by Port Nolloth, Alexanderbaai, Lekkersing, Sanddrift, Kuboes, Eksteenfontein, Sendelingsdrift asook so vêr as Springbok.

B. “Die volle aansoek, mynaansoek met name en adresse van aansoekers moet na ons gestuur word. Volgens wet is ons geregtig daarop. Verwys na Saak no. 9628/2015, tussen Duduzile Baleni & Ander vs. Streeksbestuurder: Oos-Kaap, Departement van Minerale Hulpbronne en ander.

1. Let asseblief daarop dat hierdie nie 'n mynaansoek is nie. Dit is 'prospekteerreg-aansoek'. Samara wil op hierdie stadium minerale monsters neem om te toets of dit haalbaar is om in die aansoek area te myn. Indien die resultate positief is, kan Samara wel aansoek doen vir 'n mynpermit. Samara myn nie tans in die Baken area nie. Hulle het gemyn in die Barkley Wes Distrik, in die Noord-Kaap.

Naam en adres van die prospekteerreg-aansoeker is as volg:

- Samara Mining (Pty) Ltd
- Direkteure: Dr SMA Dywili (Director, CEO and Main Shareholder) and AWA Du Preez (Director)
- Posadres: Posbus 11124, Hadison Park, Kimberley, 8306
- Fisiese adres: 13 Hogsback Crescent, Carters Glen, Kimberley, 8301
- Tel: +2753 861 1575

C. “Alle inligting moet in Afrikaans wees en ons eis hierdie inligting sodat ons 'n ingeligte besluit kan maak. Ons is geregtig daarop. Ons kan nie besluite neem sonder goeie inligting nie. Ons versoek dat hierdie inligting voor sluitingsdatum van aansoek aan ons gestuur moet word, teen 14 Desember 2020”.

1. Ons het u kommentare per e-pos eers op 15 Desember 2020 ontvang. Die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998) se Omgewingsimpakstudie-regulasies van 2014, verbied publieke konsultasie gedurende die periode van 15 Desember tot 5 Januarie. Ons was dus nie by magte om aan u versoek te voldoen nie.
2. Die sal binnekort in Afrikaans saamgestel word in die vorm van 'n **Projek Memorandum** wat aan die gemeenskapslede verskaf sal word. Let egter daarop dat die memorandum slegs vir inligtingsdoeleindes daargestel word. Die prospekteerreg-aansoekinligting is vervat in die konsep- en gefinaliseerde Omvangsbepalingsverslae, wat beskikbaar was vir publieke kommentaar by openbare biblioteke en tans beskikbaar is, op die Naledzi-webtuiste.
3. Ons beoog om vergaderings te reël met die gemeenskapslede, sodra die nuutste Covid-19 regulasies dit toelaat. Waarskynlik eers na 15 Februarie 2021. Al die projekinligting sal gedeel word by die vergaderings.

D. “Ek en die volgende gemeenskapslede verwerp die aansoek van Samara”.

- **Ons het geen vooraf inligting ontvang nie en kan nie toestemming verleen nie. Ons die grondeienaars het geen voorafinligting 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, nie konsulteer nie.**
- **Daar was geen konsultasie met Richtersvelders, wat die wettige grondeienaars is nie.**

Die vergadering was uitgestel, die gemeenskap dra geen kennis van die Samara aansoek nie.

- **Ons het geen dokumentasie ontvang nie, ons is nie ingelig nie. Die konsultant het slegs boodskappe gestuur en kennisgewings laat aanbring.**
1. Soos vermeld, is die kennisgewings en advertensie in die projek area geplaas. Die Scoping Reports” of te wel Omvangsbepalingsverslae, is vooraf beskikbaar gestel – verwys afdeling A1-4 hierbo. Datums vir die Publieke vergaderings sal bekend gemaak word sodra dit toegelaat word, soos hierbo uiteengesit. Samara sal teenwoordig wees en onder andere ook die beplande konsultasie in verband met grondeienaarstoestemming bespreek.
 2. Die Publieke Deelname proses is die onderafdeling van die Omgewingsimpakstudie waar alle belanghebbende- en geaffekteerde partye, van projekinligting voorsien word en die geleentheid gebied word om duidelikheid te kry oor alle aspekte daarvan. Die publiek word aangemoedig om deel te neem aan die proses deur insette te lewer oor die moontlike gevolge van die voorgestelde prospekter -aktiwiteite en hul gevoel daaroor bekend te maak.
 3. Die verkryging van grondeienaars se toestemming is 'n afsonderlike proses, wat onafhanklik deur die aansoeker (Samara) gevolg moet word. Daarmee saam sal enige Gemeenskaps Ontwikkelingsplan wat vir die projek beoog word, ook bekend gemaak word.

E. Ons hoor hulle gaan in die rivier myn

Dit is korrek. Samara is van plan om grootmaat mineraalmonsters te neem binne die 1: 100 vloedlyn van die Oranjerivier.

F. Hoe gaan hulle daar kom?? Waar gaan hulle paaie maak?

Die prospekter-fokusareas is in meeste dele bereikbaar vanaf bestaande mynpaaie binne die bestaande LOR-en Oena-mynreg- en minerale huurareas. Samara sal 'n eksklusiewe samewerkingsooreenkoms met LOR aangaan om die ekonomiese haalbaarheid van mynbou binne die vloedlyn en die linker oewer van die Oranjerivier te ondersoek, binne die gebied van die huidige LOR-lisensiegebied. Daarom sal Samara sover moontlik bestaande myntoegangspaaie gebruik.

G. Wat van die bedreigde plante?

1. Naledzi sal n volledige Biodiversiteits- impakstudie uitvoer op die aansoekareas om te bevestig of daar wel bedreigde plantspesies, soos beskryf onder Artikel 2 van die Noord-Kaapse Bewaringswet 2009, binne die fokusareas voorkom.

2. Die tussentydse bevinding is dat plantegroei binne die prospekter-fokusareas waarskynlik verwyder sal moet, word aangesien die grootmaat mineralmonsterneming en prospektering kan lei tot die vernietiging van beskermde plantspesies, Hierdie bevinding sal bevestig moet word deur middel van 'n volledige veldondersoek.
3. Samara beplan om op 'n klein skaal te prospekter met gelyktydige rehabilitasie. Die voorlopige beplanning is dus vir volledige rehabilitasie van die loopgrawe met die oorskot van die opgegraafde mineraalmonsters.
4. As dit haalbaar is, sal 'n reddingspoging ingestel word om die bedreigde spesies te skuif na ander gruiesterrasse, met toestemming van die owerhede. Die plante kan dan weer teruggeskuif word gedurende die rehabilitasie proses.

H. Die rivier is ge -oormerk vir besproeiing, nie vir myne nie

Volgens die Hidrologiese Omvangsbepalings Verslag en Samara se beoogde prospektermetode, sal die netto verlies aan die Oranjerivier nul wees. Die water wat uit die rivier onttrek word naby die loopgrawe sal weer stroom af teruggepomp word in die rivier.

I. Die wet laat geen myne toe in nasionale parke of wêrelderfenis gebiede nie.

Die aansoeker (Samara) is bewus van die regsimplikasies en is oortuig daarvan dat die sosio-ekonomiese voordele van prospektering in die gebied oorweeg moet word. Samara beplan talle sosiale ontwikkelingsplanne vir die Richtersveld Gemeenskap asook werkskepping vir die gemeenskapslede.

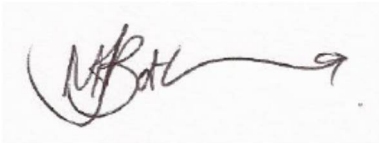
J. Ons voorouers se grafte is ooral langs die rivier. Die beoogde myn huurarea is heilige grond vir the Namagrondeienaar van die Richtersveld.

1. 'n Volledige Erfenis- en Paleontologiese -impakstudie sal uitgevoer word op die aansoekareas tydens die Impakfase, om die area se terreine van kulturele belang wat beskerm moet word, te identifiseer. Die opname sal gedurende Januarie of Februarie 2021 gedoen word, afhangende van die DMRE se terugvoer op die Omvangsbepalingsverslae. Die Argeoloog sal dan ook daartydens gemeenskapslede raadpleeg wat historiese verbintenisse het met die potensiële terreine.
2. Die aanwesigheid van Nama-grafte langs die Oranjerivier en die kulturele waarde van die toepaslike gebied, word in die Erfenis- en Paleontologiese Omvangsverslae, asook die Omvangsbepalings Verslae beklemtoon.

**K. Ons het volle Mineraal en Grondeis teen TransHex Myn huur area in die Grondeise Hof. Die konsultant het geen van bogenoemde redes in aanmerking geneem nie.
Die Nama van die Richtersveld is die wettig eeienaar van die Richtersveld. Alvorens enige mynaansoek slaag moet ons toestemming gee.**

1. Die minerale – en grondeis teen TransHex is opgeteken in die gefinaliseerde Omvangsbepalings Verslae -sien Afdeling 2c (Ligging) en in die Tabel van die samevatting van kommentare vanaf belanghebbende- en geaffekteerde partye
2. Dit sal deur die gefinaliseerde Omvangsbepalingsverslae onder die aandag van die DMHE gebring word.

Vriendelike groete,

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Marissa Botha (*Pr.Sci.Nat*)
Naledzi Environmental Consultants Pty Ltd
160 Marshall Straat, Polokwane, 0700,
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Datum: 20 Januarie 2021

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Berg Straat 57
Eksteenfontein, 8284

Epos: Eksteenfontein@richtersveld.gov.za
Tel: 079 595 4319

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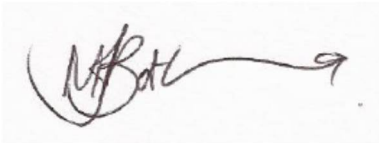
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Vriendelike groete,

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Marissa Botha (*Pr.Sci.Nat*)
Naledzi Environmental Consultants Pty Ltd
160 Marshall Straat, Polokwane, 0700,
Tel: 015 296 3988 Faks: 015 296 4021 Sel: 084 226 5584 (Marissa)
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Aandag: Mev Willamiena Bantam
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Sanddrift

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Die kommentaar wat u in die brief geopper het was nie genommer nie, so ons gee terugvoer volgens die paragrawe uiteengesit in die brief.

A. "Ek verwerp die aansoek van Samara". Ek is 'n grondeienaar en het geen vooraf inligting ontvang nie en kan dus nie toestemming verleen of kommentaar lewer nie".

1. Die "Scoping Reports" of te wel Omvangsbepalingsverslae, is vanaf 13 November tot 14 Desember 2020 elektronies beskikbaar gestel op die Naledzi-webwerf. Harde kopieë is by die volgende openbare biblioteke geplaas: Sanddrift, Kuboes, Lekkersing en Eksteenfontein asook by die Sanparke kantoor by Sendelingsdrift.
2. 'n Advertensie is op 13 November 2020 in the Gemsbok- en Plattelander Koerant gepubliseer.
3. Die Richtersveld Munisipaliteit het ook die kennisgewing geplaas op die 'Richtersveld Nuus' Facebook - blad en daar ook die verslae beskikbaar gestel vir aflaai.
4. Plakkate / Kennisgewings is ook in die gebied opgesit by Port Nolloth, Alexanderbaai, Lekkersing, Sanddrift, Kuboes, Eksteenfontein, Sendelingsdrift asook so vêr as Springbok.
5. Die Publieke Deelname proses is die onderafdeling van die Omgewingsimpakstudie waar alle belanghebbende- en geaffekteerde partye, van projekinligting voorsien word en die geleentheid gebied word om duidelikheid te kry oor alle aspekte daarvan. Die publiek word aangemoedig om deel te neem aan die proses deur insette te lewer oor die moontlike gevolge van die voorgestelde prospekter -aktiwiteite en hul gevoel daarvoor bekend te maak.

6. Die verkryging van grondeienaars se toestemming is 'n afsonderlike proses, wat onafhanklik deur die aansoeker (Samara) gevolg moet word. Daarmee saam sal enige Gemeenskaps Ontwikkelingsplan wat vir die projek beoog word, ook bekend gemaak word.

B. Ons hoor hulle gaan in die rivier myn

Dit is korrek. Samara is van plan om grootmaat mineraalmonsters te neem binne die 1: 100 vloedlyn van die Oranjerivier.

C. Hoe gaan hulle daar kom?? Waar gaan hulle paaie maak?

Die prospekter-fokusareas is in meeste dele bereikbaar vanaf bestaande mynpaaie binne die bestaande LOR-en Oena-mynreg- en minerale huurareas. Samara sal 'n eksklusiewe samewerkingsooreenkoms met LOR aangaan om die ekonomiese haalbaarheid van mynbou binne die vloedlyn en die linker oewer van die Oranjerivier te ondersoek, binne die gebied van die huidige LOR-lisensiegebied. Daarom sal Samara sover moontlik bestaande myntoegangspaaie gebruik.

D. Wat van die bedreigde plante?

1. Naledzi sal 'n volledige Biodiversiteits-impakstudie uitvoer op die aansoekareas om te bevestig of daar wel bedreigde plantspesies, soos beskryf onder Artikel 2 van die Noord-Kaapse Bewaringswet 2009, binne die fokusareas voorkom.
2. Die tussentydse bevinding is dat plantegroei binne die prospekter-fokusareas waarskynlik verwyder sal moet, word aangesien die grootmaat mineralmonsterneming en prospektering kan lei tot die vernietiging van beskermde plantspesies, Hierdie bevindings sal bevestig moet word deur middel van 'n volledige veldondersoek.
3. Samara beplan om op 'n klein skaal te prospekter met gelyktydige rehabilitasie. Die voorlopige beplanning is dus vir volledige rehabilitasie van die loopgrawe met die oorskot van die opgegraafde mineraalmonsters.
4. As dit haalbaar is, sal 'n reddingspoging ingestel word om die bedreigde spesies te skuif na ander gruiesterrasse, met toestemming van die owerhede. Die plante kan dan weer teruggeskuif word gedurende die rehabilitasie proses.

E. Die rivier is ge-oormerk vir besproeiing, nie vir myne nie

Volgens die Hidrologiese Omvangsbepalings Verslag en Samara se beoogde prospektermetode, sal die netto verlies aan die Oranjerivier nul wees. Die water wat uit die rivier onttrek word naby die loopgrawe sal weer stroom af teruggepomp word in die rivier.

F. Die wet laat geen myne toe in nasionale parke of wêrelderfenis gebiede nie.

Die aansoeker (Samara) is bewus van die regsimplikasies en is oortuig daarvan dat die sosio-ekonomiese voordele van prospektering in die gebied oorweeg moet word. Samara beplan talle sosiale ontwikkelingsplanne vir die Richtersveld Gemeenskap asook werkskepping vir die gemeenskapslede.

G. Ons voorouers se grafte is ooral langs die rivier. Die beoogde myn huurarea is heilige grond vir the Namagrondeienaar van die Richtersveld.

1. 'n Volledige Erfenis- en Paleontologiese -impakstudie sal uitgevoer word op die aansoekareas tydens die Impakfase, om die area se terreine van kulturele belang wat beskerm moet word, te identifiseer. Die opname sal gedurende Januarie of Februarie 2021 gedoen word, afhangende van die DMRE se terugvoer op die Omvangsbepalingverslae. Die Argeoloog sal dan ook daartydens gemeenskapslede raadpleeg wat historiese verbintenisse het met die potensiele terreine.
2. Die aanwesigheid van Nama-grafte langs die Oranjerivier en die kulturele waarde van die toepaslike gebied, word in die Erfenis- en Paleontologiese Omvangsverslae, asook die Omvangsbepalings Verslae beklemtoon.

H. Ons het volle Mineraal en Grondeis teen TransHex Myn huur area in die Grondeise Hof. Die konsultant het geen van bogenoemde redes in aanmerking geneem nie.

Ek Willamiena Bantam is 'n Nama van die Richtersveld en is die wettig eienaar van die Richtersveld. Alvorens enige mynaansoek slaag moet ons toestemming gee.

1. Die minerale – en grondeis teen TransHex is opgeteken in die gefinaliseerde Omvangsbepalings Verslae -sien Afdeling 2c (Ligging) en in die Tabel van die samevatting van kommentare vanaf belanghebbende- en geaffekteerde partye
2. Dit sal deur die gefinaliseerde Omvangsbepalingsverslae onder die aandag van die DMHE gebring word.

Vriendelike groete,



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

Datum:20 Januarie 2021

Aandag: Mnr Willem Cloete

OMVANGSBEPALINGSVERSLAG: OMGEWINGSIMPAK STUDIE EN WATER LISENSIE AANSOEK VIR DIE VOORGESTELDE PROSPEKTEERREG - AANSOEKE VIR DIAMANTE OP DIE LINKER OEWER VAN DIE ORANJE RIVIER, RICHTERSVELD, NAMAKWA DISTRIK, NOORD-KAAP, SUID AFRICA

U kommentaar gedateer 14 Desember 2020 aangaande die bogenoemde projek hou verband.

Ons wil hiermee van die geleentheid gebruik maak om u te bedank vir u insette as deel van die publiekedeelname proses. U kommentaar is aangeteken in die finale Omvangsbepalingsverslae wat voorgelê is aan die Departement van Minerale Hulpbronne en Energie (DMHE) te Springbok.

Elektroniese afskrifte van die finale Omvangsbepalingsverslae vir aansoek area 1 en area 2, soos voorgelê aan die DMHE, is beskikbaar vir aflaai en besigtiging op die Naledzi webtuiste op die volgende skakel: <http://www.naledzi.co.za/public-documents-naledzi.php>.

Die kommentaar wat u in die brief geopper het was nie genommer nie, so ons gee terugvoer volgens die paragrawe uiteengesit in die brief.

A. “Ons het nie die Scoping verslae, visuele scoping , Grondwater Scoping verslae of mynplanne en aanhangsels wat saam die aansoek gaan, gekry nie”.

1. Die “Scoping Reports” of te wel Omvangsbepalingsverslae, is vanaf 13 November tot 14 Desember 2020 elektronies beskikbaar gestel op die Naledzi-webwerf. Harde kopieë is by die volgende openbare biblioteke geplaas: Sanddrift, Kuboes, Lekkersing en Eksteenfontein asook by die Sanparke kantoor by Sendelingsdrift.
2. ’n Advertensie is op 13 November 2020 in the Gemsbok- en Plattelander Koerant gepubliseer.
3. Die Richtersveld Munisipaliteit het ook die kennisgewing geplaas op die ‘Richtersveld Nuus’ Facebook - blad en daar ook die verslae beskikbaar gestel vir aflaai.
4. Plakkate / Kennisgewings is ook in die gebied opgesit by Port Nolloth, Alexanderbaai, Lekkersing, Sanddrift, Kuboes, Eksteenfontein, Sendelingsdrift asook so vêr as Springbok.

B. “Die volle aansoek, mynaansoek met name en adresse van aansoekers moet na ons gestuur word. Volgens wet is ons geregtig daarop. Verwys na Saak no. 9628/2015, tussen Duduzile Baleni & Ander vs. Streeksbestuurder: Oos-Kaap, Departement van Minerale Hulpbronne en ander.

1. Let asseblief daarop dat hierdie nie 'n mynaansoek is nie. Dit is 'prospekteerreg-aansoek'. Samara wil op hierdie stadium minerale monsters neem om te toets of dit haalbaar is om in die aansoek area te myn. Indien die resultate positief is, kan Samara wel aansoek doen vir 'n mynpermit. Samara myn nie tans in die Baken area nie. Hulle het gemyn in die Barkley Wes Distrik, in die Noord-Kaap.

Naam en adres van die prospekteerreg-aansoeker is as volg:

- Samara Mining (Pty) Ltd
- Direkteure: Dr SMA Dywili (Director, CEO and Main Shareholder) and AWA Du Preez (Director)
- Posadres: Posbus 11124, Hadison Park, Kimberley, 8306
- Fisiese adres: 13 Hogsback Crescent, Carters Glen, Kimberley, 8301
- Tel: +2753 861 1575

C. “Alle inligting moet in Afrikaans wees en ons eis hierdie inligting sodat ons 'n ingeligte besluit kan maak. Ons is geregtig daarop. Ons kan nie besluite neem sonder goeie inligting nie. Ons versoek dat hierdie inligting voor sluitingsdatum van aansoek aan ons gestuur moet word, teen 14 Desember 2020”.

1. Ons het u kommentare per e-pos eers op 15 Desember 2020 ontvang. Die Wet op Nasionale Omgewingsbestuur, 1998 (Wet 107 van 1998) se Omgewingsimpakstudie-regulasies van 2014, verbied publieke konsultasie gedurende die periode van 15 Desember tot 5 Januarie. Ons was dus nie by magte om aan u versoek te voldoen nie.
2. Die sal binnekort in Afrikaans saamgestel word in die vorm van 'n **Projek Memorandum** wat aan die gemeenskapslede verskaf sal word. Let egter daarop dat die memorandum slegs vir inligtingsdoeleindes daargestel word. Die prospekteerreg-aansoekinligting is vervat in die konsep- en gefinaliseerde Omvangsbepalingsverslae, wat beskikbaar was vir publieke kommentaar by openbare biblioteke en tans beskikbaar is, op die Naledzi-webtuiste.
3. Ons beoog om vergaderings te reël met die gemeenskapslede, sodra die nuutste Covid-19 regulasies dit toelaat. Waarskynlik eers na 15 Februarie 2021. Al die projekinligting sal gedeel word by die vergaderings.

D. “Ek en die volgende gemeenskapslede verwerp die aansoek van Samara”.

- **Ons het geen vooraf inligting ontvang nie en kan nie toestemming verleen nie. Ons die grondeienaars het geen voorafinligting 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, nie konsulteer nie.**
- **Daar was geen konsultasie met Richtersvelders, wat die wettige grondeienaars is nie.**

Die vergadering was uitgestel, die gemeenskap dra geen kennis van die Samara aansoek nie.

- **Ons het geen dokumentasie ontvang nie, ons is nie ingelig nie. Die konsultant het slegs boodskappe gestuur en kennisgewings laat aanbring.**
1. Soos vermeld, is die kennisgewings en advertensie in die projek area geplaas. Die Scoping Reports” of te wel Omvangsbepalingsverslae, is vooraf beskikbaar gestel – verwys afdeling A1-4 hierbo. Datums vir die Publieke vergaderings sal bekend gemaak word sodra dit toegelaat word, soos hierbo uiteengesit. Samara sal teenwoordig wees en onder andere ook die beplande konsultasie in verband met grondeienaarstoestemming bespreek.
 2. Die Publieke Deelname proses is die onderafdeling van die Omgewingsimpakstudie waar alle belanghebbende- en geaffekteerde partye, van projekinligting voorsien word en die geleentheid gebied word om duidelikheid te kry oor alle aspekte daarvan. Die publiek word aangemoedig om deel te neem aan die proses deur insette te lewer oor die moontlike gevolge van die voorgestelde prospekter -aktiwiteite en hul gevoel daaroor bekend te maak.
 3. Die verkryging van grondeienaars se toestemming is 'n afsonderlike proses, wat onafhanklik deur die aansoeker (Samara) gevolg moet word. Daarmee saam sal enige Gemeenskaps Ontwikkelingsplan wat vir die projek beoog word, ook bekend gemaak word.

E. Ons hoor hulle gaan in die rivier myn

Dit is korrek. Samara is van plan om grootmaat mineraalmonsters te neem binne die 1: 100 vloedlyn van die Oranjerivier.

F. Hoe gaan hulle daar kom?? Waar gaan hulle paaie maak?

Die prospekter-fokusareas is in meeste dele bereikbaar vanaf bestaande mynpaaie binne die bestaande LOR-en Oena-mynreg- en minerale huurareas. Samara sal 'n eksklusiewe samewerkingsooreenkoms met LOR aangaan om die ekonomiese haalbaarheid van mynbou binne die vloedlyn en die linker oewer van die Oranjerivier te ondersoek, binne die gebied van die huidige LOR-lisensiegebied. Daarom sal Samara sover moontlik bestaande myntoegangspaaie gebruik.

G. Wat van die bedreigde plante?

1. Naledzi sal n volledige Biodiversiteits- impakstudie uitvoer op die aansoekareas om te bevestig of daar wel bedreigde plantspesies, soos beskryf onder Artikel 2 van die Noord-Kaapse Bewaringswet 2009, binne die fokusareas voorkom.

2. Die tussentydse bevinding is dat plantegroei binne die prospekter-fokusareas waarskynlik verwyder sal moet, word aangesien die grootmaat mineralmonsterneming en prospektering kan lei tot die vernietiging van beskermde plantspesies, Hierdie bevinding sal bevestig moet word deur middel van 'n volledige veldondersoek.
3. Samara beplan om op 'n klein skaal te prospekter met gelyktydige rehabilitasie. Die voorlopige beplanning is dus vir volledige rehabilitasie van die loopgrawe met die oorskot van die opgegraafde mineraalmonsters.
4. As dit haalbaar is, sal 'n reddingspoging ingestel word om die bedreigde spesies te skuif na ander gruiesterrasse, met toestemming van die owerhede. Die plante kan dan weer teruggeskuif word gedurende die rehabilitasie proses.

H. Die rivier is ge -oormerk vir besproeiing, nie vir myne nie

Volgens die Hidrologiese Omvangsbepalings Verslag en Samara se beoogde prospektermetode, sal die netto verlies aan die Oranjerivier nul wees. Die water wat uit die rivier onttrek word naby die loopgrawe sal weer stroom af teruggepomp word in die rivier.

I. Die wet laat geen myne toe in nasionale parke of wêrelderfenis gebiede nie.

Dit is korrek.

J. Ons voorouers se grafte is ooral langs die rivier. Die beoogde myn huurarea is heilige grond vir the Namagrondeienaar van die Richtersveld.

1. 'n Volledige Erfenis- en Paleontologiese -impakstudie sal uitgevoer word op die aansoekareas tydens die Impakfase, om die area se terreine van kulturele belang wat beskerm moet word, te identifiseer. Die opname sal gedurende Januarie of Februarie 2021 gedoen word, afhangende van die DMRE se terugvoer op die Omvangsbepalingverslae. Die Argeoloog sal dan ook daartydens gemeenskapslede raadpleeg wat historiese verbintenisse het met die potensiele terreine.
2. Die aanwesigheid van Nama-grafte langs die Oranjerivier en die kulturele waarde van die toepaslike gebied, word in die Erfenis- en Paleontologiese Omvangsverslae, asook die Omvangsbepalings Verslae beklemtoon.

K. Ons het volle Mineraal en Grondeis teen TransHex Myn huur area in die Grondeise Hof. Die konsultant het geen van bogenoemde redes in aanmerking geneem nie. Die Nama van die Richtersveld is die wettig eeienaar van die Richtersveld. Alvorens enige mynaansoek slaag moet ons toestemming gee.

1. Die minerale – en grondeis teen TransHex is opgeteken in die gefinaliseerde Omvangsbepalings Verslae -sien Afdeling 2c (Ligging) en in die Tabel van die samevatting van kommentare vanaf belanghebbende- en geaffekteerde partye
2. Dit sal deur die gefinaliseerde Omvangsbepalingsverslae onder die aandag van die DMHE gebring word.

Vriendelike groete,

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

Date: 20 January 2021

Attention: Dr. Chris Brown

CEO – Namibian Chamber of Environment
P O Box 40723
Ausspannplatz
Windhoek, Namibia

Email: ceo@m-c-e.org
Tel: +264 61 240 140

RE: COMMENT SHEET SUBMITTED ON DRAFT SCOPING REPORT FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

The concise comments from Namibian Chamber of Environment submitted on 16 November 2020 refers;

We would herewith like to take this opportunity to thank the Namibia Chamber of Environment for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Report and submitted to the Department of Mineral Resources and Energy, Springbok.

Electronic copies of the finalised Scoping Reports for both PRAA 1 and PRAA 2, as submitted to DMRE, are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

The issues raised by Chamber of Environment were numbered and we respond accordingly.

In essence, the issues raised are potential impacts that need to be considered for the project. Naledzi have included these potential impacts in the finalised Scoping Reports as aspects for further investigation in the EIA Phase. Refer to Section 2 (d)iv)(1)(a) subsection 1.5.1.2 (surface water use), 1.6 (Freshwater Ecosystems) 1.7 (Terrestrial Biodiversity), 1.8 (visual aspects), 1.12 (Cultural, Heritage and Palaeontological Importance and 1.13 (Socio-Economic Environment) of the finalised Scoping Reports.

Specialist Scoping Reports (Appendix 6) have been conducted to screen the potential impacts. In-depth specialist investigations as set out under Section (i) Plan of Study for EIA Process, subsection ii and iii, within the finalised Scoping Reports and will be undertaken during the EIA Phase to confirm the significance of the potential impacts and to formulate site specific mitigation and monitoring measures.

1. Water Abstraction

It is understood that the net loss to the Orange River will be zero. Water abstracted from the river will be abstracted, clarified and released back into the river downstream of the workings.

2. Changes in river flow – diverting water

The overall potential impacts from the mining/prospecting operations on the Orange River system would be sedimentation to the river and the changes in the flow dynamics of the Orange River in and around the bulk sampling sites. The water diversion and impedance to limit ingress of water to the excavations would result in reduced river flow volumes. Sedimentation and erosion control will be vital at the proposed prospecting focus area. A Hydrological and Hydrogeological Study has been commissioned for the project. The Hydrologist has presented a Scoping Report which formed part of the DMRE Scoping Reports and will be undertaken a full Hydrological and Hydrogeological Impact Assessment investigation during the EIA Phase.

3. Impact on Aquatic Fauna and Flora

The prospecting pockets are located within the endangered Lower Gariep Alluvial vegetation. The prospecting pockets pose a threat to this vegetation type. The ecosystem is extremely ecologically important and sensitive, and the proposed prospecting and bulk sampling activities pose a very significant risk to the ecology and biodiversity of the area. All aspects of the proposed prospecting and bulk sampling activities will be considered in extensive detail and all aspects will be well planned and executed. It must also be noted from the outset that significant constraints are likely to be placed on the activity to conserve the environment, as a minimum, if the development is authorised to proceed at all. Full Terrestrial Biodiversity - and Aquatic Ecology Impact Assessment Studies will be commissioned during the EIA Phase to further assess the significance of the impact on aquatic fauna and flora to and recommend mitigation measures for inclusion in the Environmental Management Programme.

4. Visual Impact - Sense of Place

The prospecting and bulk sampling activities could have a negative impact on the landscape character, sense of place and visual quality of the area. There are significantly high visual impacts associated with the project which will be assessed in detail in the EIA Phase. A Visual Impact Assessment will be conducted to determine the potential impact of the activities on the sense of place, landscape quality and character of the receiving environment.

5. Impact on the Transboundary Ais Ais Richtersveld Landscape, Impact on Tourism

The prospecting and bulk sampling activities have the potential to impact on the cultural heritage, conservation and or tourism of the park. This potential impact will be investigated further in the EIA Phase and has been included as aspects for further investigation for Prospecting Right Application Area 2 (PRAA 2) and PRAA 1. Please note that PRAA 2 and the northern portion of PRAA 1 falls within the Richtersveld National Park and prospecting and mining herein is prohibited in terms of Section 48 of the South African National Environmental Management: Protected Areas Act, 2003 (Act 57 of 2003). There is therefore a legal implication for prospecting and mining on the entire PRAA 2 and only the northern portion of PRAA 1. According to legislation these areas should be excluded from the application area. However the applicant is strongly convinced that there is room for coexistence of the overlapping applications.

Furthermore, the Richtersveld National Park has a significantly high eco-tourism aspect including but not limited to indigenous culture, rich biodiversity, river rafting, Fish River Canyon hike, sport fishing along the Orange River, birdwatching, and desert living. The proposed prospecting and bulk sampling activities will have the potential to have a significant impact on the ecotourism of the area. Limited portions of the RNP will observe the activities, however, this area includes camping sites and the project may have a potentially very significant negative visual impact on the camping sites and sense of place for tourist. This impact will be investigated further in the EIA Phase by conducting a one-one engagement with the RNP management to determine potential impact on tourism, should the applications proceed to the EIA Phase.

6. Poaching and illegal collection of natural resources

7. Illegal crossing of river (border) by staff

Poaching and illegal collection of natural resources, including illegal crossing of the border by the staff will be prohibited in terms of the Environmental Management Programme (EMPr) to be prepared for the application areas. The prospecting works will be strictly monitored.

8. Impact rural lives and livelihoods

At this point in time no impact on livelihoods is foreseen. We are aware that local farmers bring their livestock to the Orange River to drink and graze on the riparian vegetation. According to Samara farmers will continue to have access for their livestock to the Orange River. As the mining method will not affect the normal day to day flow of the Orange River, neither will it impact on any agricultural or farming activities taking place around the Orange River.

Please ensure to download and review the Final Scoping Reports as specified in the initial sections of the letter. Kindly note that there is no comment period on the reports, it is available for informative purposes. If you do wish to raise further comments on the finalised reports these can be sent to Naledzi to be addressed in the draft Environmental Impact Reports for the applications.

Regards,

A handwritten signature in black ink, appearing to read 'M Botha', with a long horizontal line extending to the right that ends in a small arrowhead.

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

Date: 20 January 2021

Attention: Dr Melissa Lewis
Policy and Advocacy Programme Manager
Terrestrial Bird Conservation
Birdlife South Africa
Isdell House, 17 Hume Road
Dunkeld West, 2196

Email: Melissa.Lewis@birdlife.org.za

RE: COMMENT SHEET SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Your comments dated 15 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank Birdlife South Africa for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Reports and submitted to the Department of Mineral Resources and Energy, Springbok on 11 January 2021.

Electronic copies of the PRAA 1 and PRAA 2 finalised Scoping Reports are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

We herewith wish to respond to your comments in the below section. Your comments were numbered and we respond accordingly.

Responses:

The opening comments are noted and have been recorded as part of the Final Scoping Reports submitted to the DMRE.

1. The DEA Screening Reports for both application areas are included in the finalised Scoping Reports under Appendix 6 and addressed in Section 2 (e) Policy and Legislative Context, item E 34. The environmental themes and assessment protocols are addressed in Section 2(e) item E36 to E 40. The environmental themes are also specified and addressed under Section h (iv) (i) (a). The screening tool results include the following:
 - a) PRAA 1:
 - i. Legal implication (protected area) on the northern portion of PRAA 1;
 - ii. Very high sensitivity theme for terrestrial – and aquatic biodiversity, high sensitivity theme for heritage; medium sensitivity theme for plant and animal species including Palaeontological features; and low sensitivity theme for agriculture;

- iii. Required specialist studies: Visual -, Archaeological and Heritage -, Terrestrial Biodiversity -, Aquatic Biodiversity, Hydrology – and Socio Economic Impact Assessment inclusive of plant and animal species assessments.
 - iv. Applicable protocols include:
 - a. Site Sensitivity Verification Requirements Where a Specialist Assessment is required but no Protocol has been Prescribed (GNR. 320 of 20 March 2020)
 - b. Protocol for the Specialist Assessment and minimum report content requirements for environmental impacts on Aquatic Biodiversity; (GNR. 320 of 20 March 2020)
 - c. Protocol for the specialist assessment and minimum report content requirements for environmental impacts on Terrestrial Biodiversity (GNR. 320 of 20 March 2020)
 - d. GNR 1150 of 30 October 2020: Protocols relevant to Terrestrial Plant – and Animal Species
- b) PRAA 2:
- i. Legal implication on PRAA being located in a protected area;
 - ii. Very high theme for biodiversity, aquatic ecology, archaeology and cultural heritage; medium sensitivity theme for plant species and Palaeontological features; low sensitivity theme for agriculture and animal species.
 - iii. Required specialist studies include Visual -, Archaeological and Heritage -, Terrestrial Biodiversity -, Aquatic Biodiversity, Hydrology – and Socio Economic Impact Assessment inclusive of plant and animal species assessments.
 - iv. Protocols applicable are mentioned above in Section 1(a)(iv).
2. This is stated in the draft and finalised Scoping Reports under Section 2 h (iv)(1)(a), subsection 1.6.1. The Aquatic Ecology-, Biodiversity-, Hydrological and Hydrogeological Impact Assessments will need to determine and confirm the potential risk to the Orange River Mouth. The draft EIR will therefore confirm whether the prospecting has the potential to degrade the Orange River site and make recommendations accordingly.
3. The finalised Scoping Reports address:
- a. the criteria for designation of the Orange River Mouth in Section 2h(iv) 1(a) subsection 1.6.1. and 1.7.3
 - b. AEWA agreement in Section 2(e) under Policy and Legislative Context under item E 20 and Section 2h(iv) 1(a) subsection 1.7.3.; and
 - c. The relevance of CMS in Section 2e, item 19 and Section 2h(iv) 1(a) subsection 1.7.3.

The AEWA Secretariat has been added to the updated I&AP database included as Appendix 5 to the finalised Scoping Report and will be consulted during January 2021.

4. An Avifaunal Specialist will be commissioned to conduct the Avifauna Assessment as part of the Biodiversity Impact Assessment. The Terrestrial Animal Species Protocol is applicable. According to the Specialist Scoping Report method statement, the avifaunal assessment will cover the generic effects of the proposed mining and migratory routes and breeding sites of potential Red Data List species, as well as ecological and migratory connectivity.
5. Noted. The EIA will include all direct and indirect impacts. The EIA will rely on the findings and recommendations from specialists and thus the requirement have been brought to the attention of the appointed Ecologists (Aquatic and Biodiversity).
6. Noted. The appointed EAP and specialist team will assist Samara to formulate the required mitigation, rehabilitation and monitoring measures based the finalised prospecting method. Samara are also engaging with a multidisciplinary team to assist with the formulation of the finalised prospecting method with concurrent rehabilitation, with the lowest possible environmental risk. The EIA Report will consider the hierarchy of rehabilitation measures that can/should be applied. In certain instances where the EAP or specialists are uncertain of the success rate of the rehabilitation measures, restrictions would need to be placed on the activity or source. Nonetheless, these are recommendations the specialists will need to make based on the refined prospecting method and findings of field investigations.
7. Noted. The specialist investigations will confirm the presence of CBA1 area during the EIA Phase. The Scoping Reports also state that it is deemed likely that these areas could be considered no-go areas from a biodiversity perspective due to the high impact and potential loss of irreplaceable habitat.
8. The comment has been recorded and the cumulative impacts are addressed in the finalised Scoping Reports under Section (ii), subsection ii, in the Plan of Study for EIA.
9. The refined method and designs will be used to base the specialists investigations on which will ultimately inform the findings of the EIA and EMPr reports.
10. The application for relaxation of the GNR 704 conditions will be incorporated into the WULA. The Water Use Technical Report will contain these details and be made available for 60 days public review and comment. The formal WULA process will only start once the prospecting sites have been determined. The PPP for the EIA already talks about the WULA to key role-players.

Regards,



Marissa Botha (*Pr.Sci.Nat*)
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Tel: 015 296 3988 Fax: 015 296 4021 Cell: 084 226 5584 (Marissa)
Email: botham@naledzi.co.za

Date: 20 January 2021

Attention: Mr Brent Whittington

Park Manager: Richtersveld National Park: SANParks
P O Box 406
Alexander Bay, 8290

Email: brent.whittington@sanparks.org

Tel: 027-831 1506

RE: COMMENTS SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Your comments dated 3 and 15 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank the Richtersveld National Park for its valuable inputs on the draft Scoping Reports and public participation process for the above mentioned project. The comments have been recorded and addressed in the Finalised Scoping Reports and have been submitted to the Department of Mineral Resources and Energy, Springbok on 11 January 2021.

The electronic copies of the finalised reports for both PRAA 1 and PRAA 2, as submitted to DMRE, are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

We herewith wish to respond to national park's comments in the below sections according to the respective comment submission dates.

Comments dated 3 December 2020:

- (i) The content thereof is noted and that SANParks does not support this application.
- (ii) The prohibition of prospecting and mining within protected areas has been highlighted in several sections of the draft and finalised Scoping Reports for PRAA 1 and PRAA 2. It is highlighted in the reports that PRAA 2 and the northern portion of PRAA 1 falls within the protected area of the Richtersveld National Park.
- (iii) We have included SANPark's comment with regard the application area legal implications in final reports in Section 2 (c) 'Locality' in the paragraph on 'Legal Implication' and section 2(e) 'Policy and Legislative context'.
- (iv) It has further been emphasised in Section 2 (e) item E3 of the finalised reports that "in terms of Section 22 (b) (ii) of the NEMA EIA Regulations of 2014, the competent authority is required to refuse an application if the activity is in conflict with other legislation".

The finalised Scoping Reports therefore acknowledge the legal implication for mining on PRAA 2 and the northern portion of PRAA 1 and advises the exclusion of these areas from the application process.

The applicant is however not in support of exclusion of an application area or sections thereof. Samara strongly believe that prospecting at the application areas will have a multitude of economic advantages for the Richtersveld - and cross border communities and that these socio-economic benefits should considered (see Appendix 3.6 Motivation for Prospecting Rights appended to Scoping Reports). Consequently Samara is requesting to explore the full extent of the application areas.

Ultimately, the Department of Mineral Resources and Energy will need to reach a decision based on the data gathered and recorded in the finalised Scoping Reports, as to whether the EIA Process may proceed on the full extent of the application areas.

The DMRE's decision should be available by 23 February 2021 and the outcome will be communicated to I&APs once received.

Comments dated 15 December 2020:

NEMPAA:

- **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 Section 50 (5) of the act and its regulations, no development /construction may be permitted in a national park, nature reserve or world heritage site without the prior written approval of the management authority.**
- **The RNP management authority is SANPARKS with its head office in Groenkloof, Pretoria.**

The requirement in terms of Section 50 and 50 (5) of the NEMPAA has been included under finalised Scoping Report in Section 2e, subsection E7. If the applications are permitted to proceed, Samara will seek written approval from SANParks (Groenkloof, Pretoria) in terms of Section 50 (5) for inclusion in the draft Environmental Impact Reports (EIRs) and for submission to the DMRE as part of the finalised EIRs. According to legislation environmental authorisation may not be issued without the prior written consent/approval from the protected area management authority.

Bufferzone:

- **The activity falls within the approved expansion footprint and buffer area of the RNP as per the RNP Management Plan (2018-2028). A Biodiversity Policy and Strategy for South Arica: A strategy of Buffer Zones for National Parks was gazetted in 2020 (GN 35020, 8 Feb 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.**

This has been recorded in the finalised Scoping Report in Section 2 (e) 'Policy and Legislative Context' under item E29.

- **The proposed applications also occur in a critical biodiversity area (CBA's) as per the Northern Cape Biodiversity Conservation Plan of 2016. CBA's are terrestrial and aquatic features in the landscape are critical for conserving biodiversity and maintaining ecosystem functioning. The management objectives, as per the Northern Cape Biodiversity Plan, are 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 Orange River is threatened and that is highlighted in the DENC biodiversity plan.**

This has been stated and recorded in Section 2 (e) Item E25 of the Scoping Report including in the section on 'description of the affected environment'.

- **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 these terraces is critical to the protection and conservation of numerous endemic plant species occurring on these terraces in South Africa”. Please also see provided report of Pieter van Wyk et al.**

The presence of ancient gravel terraces within the prospecting focus areas have been highlighted in finalised Scoping Reports in the section on 'the description of the affected environment' and the 'list of new Fauna and Flora in the Richtersveld National Park' has been attached under Appendix 6 of the reports. SANParks comments, DENC recommendations on 'Potjiesram Application' including the new list of fauna and flora for RNP have been brought to the attention of the Aquatic and Terrestrial Ecologist for consideration in their specialist investigations.

- **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 livestock farmers will continue to have access for their livestock to the Orange River. The prospecting method will not affect the normal day to day flow of the Orange River, neither will it impact on any agricultural or farming activities take place around the Orange River.

- **The lack of consultation with the community and not addressing the cultural heritage are of a great concern.**

The cultural heritage of the communities relevant to the application areas have been screened as a potential impact and is an aspect for further investigation in the EIA Phase. A full Heritage and Palaeontological Impact Assessment will be carried out for the application areas. This Archaeologist may also consult with the community members during his investigation.

With regard to the 'lack of consultation' referred to in the RNP comments; kindly note that Naledzi has had no alternative but to cancel/postpone the community meetings due to the risk of Covid-19. In December 2020 there was a prevailing risk in the Richtersveld, consequently the 3-4 December 2020 meetings had to be postponed. Subsequently the Covid-19 regulations of 29 December 2020 and 12 January 2021 respectively placed a prohibition on public gatherings.

We have also considered, with the relevant Ward Councillors, to conduct open days in each community wherein we address a small group of fifty (50) community members per session, yet the councillors have made it clear that the local SAPS do not permit any of these proposed gatherings. We were/are thus compelled to wait until these gatherings are permitted. We feel that public participation is a 'group dynamic' and these engagements need to take place 'face-to-face' with the communities. The proposal is reschedule these meetings after 15 February 2021, if permitted by government.

Naledzi has in the mean time, with the assistance of the Ward 1 and 2 Councillors, created a community member WhatsApp Group named 'Naledzi Publieke Deelname' through which community members have been able to provide their initial comments and ask questions of clarity. We have record these comments in the finalised Scoping Reports.

Regards,

A handwritten signature in black ink, appearing to read 'M Botha', with a long horizontal stroke extending to the right and ending in a small arrowhead.

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

Date: 20 January 2021

Attention: Mr Thivhulawi Nethononda
Directorate: Protected Areas Planning
Department of Environment, Forestry and Fisheries
Environment House, 473 Steve Biko Street
Pretoria, 0001

Email: tnethononda@environment.gov.za
Tel: 012 399 9553

RE: DEFF: PROTECTED AREAS COMMENTS DATED 14 DECEMBER 2020 ON DRAFT SCOPING REPORT FOR THE EIA PROCESS AND WULA FOR TWO PROPOSED PROSPECTING RIGHT APPLICATIONS FOR ALLUVIAL DIAMONDS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

The official comments from DEFF: Protected Areas Planning and Management submitted to NEC on 15 December 2020 refers.

We would herewith like to take this opportunity to thank the department for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Report submitted to the DMRE: Springbok.

Electronic copies of the finalised Scoping Reports for both PRAA 1 and PRAA 2 as submitted to DMRE are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

The comments raised in the letter were according to headings and are bulleted, we will respond accordingly.

PROSPECTING RIGHT APPLICATION AREA (PRAA 2)

- **Section 48 of NEMPAA states that despite other legislation, no person may conduct commercial prospecting, mining exploration, production or related activities in a special nature reserve, national park or nature reserve.**

The legal implication in terms of NEMPAA is applicable to PRAA 2 and the northern portion of PRAA 1 and has been highlighted in the draft and Final Scoping Reports under Section 2(e) 'Policy and Legal Context' under items E5, E8 (PRAA 1) and items E3, E4, E8, E12 and E 28 (PRAA 2) and in several sections through the reports.

- **The report indicated that PRAA 2 is situated on the lower Orange River on the boundary of the Richtersveld National Park on the border between South Africa and Namibia.**
- **The report also indicated that Samara will prospecting for alluvial diamonds within the 100 year flood line of the Orange River inside the national park which is prohibited by NEMPAA section 48.**

- **The report is not correct to indicate that the prospecting will be on the boundary of the national park while the prospecting will be inside the national park. The Richtersveld National Park was declared on 16 August 1991, a copy of the 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.**

We thank the department for furnishing the Richtersveld National Park proclamation. The PRAA 2 location within the national park has been corrected in the PRAA 2 finalised Scoping Report. Please refer to Section 2c (Locality), 2e (Policy and Legislative Context) including Figures 1 and 2 and Appendix 3 which illustrates the location of the application area within the protected area.

Naledzi advises in the finalised Scoping Report that according to the NEMA EIA Regulations of 2014, section 22, the application is not permitted to proceed to EIA Phase if it is in conflict with other legislation. The applicant is however convinced that there is room for coexistence of the overlapping applications.

PROSPECTING RIGHT APPLICATION AREA (PRAA 1)

- **The report indicated that the PRAA 1 is situated on the left bank of the lower Orange River at Sanddrift, on the border between South Africa and Namibia, approximately 30km from Alexander Bay in the Northern Cape;**
- **Samara will prospect for alluvial diamonds within the floodline 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 the national protected area but provincial department of Nature Conservation in Kimberley must be consulted as management authority of the Orange River Mouth Nature Reserve.**

Comments made in the first two bullets are correct. However please note, as for bullet no. 3, the northern portion of PRAA 1 does in fact fall within the RNP protected area, however not the prospecting focus areas. This was also pointed out by Ms. Willeen Olivier, DEFF: TFCA, at the 14 December 2020 Authorities Meeting. This has been corrected in the PRAA 1 finalised Scoping Report under 2 c under 'Legal Implication' and Figures 1 and 2.

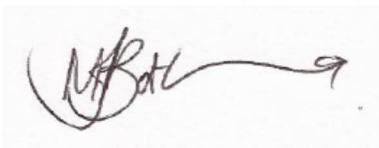
The DENC: Protected Areas directorate will be added to the I&APs Database and consulted as part of the EIA Phase public participation process.

- **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 department of Human Settlement, Water and Sanitation and Mineral Resource and Energy.**

The formal Water Use License Application for water use authorisation will be submitted once the location of the prospecting focus areas and infrastructure are determined. The public participation process for the EIA Process and WULA has started already and is presently talking about the WULA to key-role players. It is anticipated that the application will be submitted during the EIA Phase.

The applications for prospecting right and environmental authorisation was submitted simultaneously in July 2020, which seeks environmental authorisation and prospecting rights with bulk sampling to extract the alluvial diamond samples. Samara will only commence with the proposed activities once also applicable license and rights have been issued by the relevant authorities.

Regards,

A handwritten signature in black ink, appearing to read 'M Botha', with a long horizontal stroke extending to the right and ending in a small arrowhead.

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

Date: 20 January 2021

Attention: Mr A. Nyakaza
Environmental Officer
Department of Environment, Nature Conservation: Northern Cape
Voortrekker & Magasyn Street
Springbok, 8240

Email: aviwenyakaza.denc@gmail.com
Tel: 027 718 8800 / 060 991 4817

RE: COMMENTS SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

The department's comments dated 12 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank the DENC for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Report and submitted to the Department of Mineral Resources and Energy, Springbok.

Electronic copies of the finalised Scoping Reports for both PRAA 1 and PRAA 2, as submitted to DMRE, are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

The DENC comments were not numbered thus we respond according the requirements stipulated in the letter.

1. The DENC requirements for the Biodiversity Impact Assessment and permits for removal of indigenous and protected species is noted and has been recorded in the final Scoping Reports in Section 2e 'Policy and Legislative Context' under item E16 including in the section on 'description of affected environment'. The appointed Ecologist has been furnished with the DENC requirements and will also comply with the Protocols for Specialist Assessments set out in the following government notices:
 - a. GNR. 320 of 20 March 202, Procedures for the Assessment of Minimum Criteria for Reportign on Environmental Themes (relevant to Aquatic – and Terrestrial Biodiversity);
 - b. GNR. 1150 of 30 October 2020 – Protocol for the Specialist Assessments for Environmental Impacts on Terrestrial Animal-and Plant Species
2. Erosion control measures will be included in the EIR and EMPR reports for the applications and will be informed by specialist recommendations from the Hydrological & Hydrogeological Impact Assessment Study including the Aquatic-and Terrestrial Biodiversity studies ;

3. The final site plan and composite map will be included in the draft EIR & EMPr reports and will be cognizant of environmental sensitivities and ultimately be informed by specialist recommendations made based on the outcomes of field investigations.
4. The proposed volume of fuel to be stored onsite will be confirmed in the draft EIR & EMPR reports, since there details are not presently available.

Regards,

A handwritten signature in black ink, appearing to read 'M Botha', with a long horizontal stroke extending to the right that ends in a small arrowhead.

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

Date: 20 January 2021

Attention: Prof. David Morris
Head of Archaeology
McGregor Museum, Sol Plaatjie University
Kimberley, 8300

Email: dmorriskby@gmail.com
Tel: 053-839 2700 / 082 222 4777

RE: COMMENT SHEET SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Your comments dated 15 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank you for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Reports and submitted to the Department of Mineral Resources and Energy, Springbok on 11 January 2021.

Electronic copies of the PRAA 1 and PRAA 2 finalised Scoping Reports are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

We herewith wish to respond to your comments in the below section.

A. 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)."

- a) The incorrectly quoted dates have been brought to the attention of the Archaeologist.
- b) It will be corrected in the Heritage – and Palaeontological Impact Assessment Reports for the application areas to be produced during the EIA Phase.

B. The McGregor Museum as provincial museum for the Northern Cape should have been consulted for records/insights concerning the area.

- a) Kindly note that the Heritage and Palaeontological Scoping Reports are desktop based. Indepth research and a field investigation will be carried out during the EIA Phase. The Archaeologist has confirmed that the McGregor Museum will be engaged during the EIA Phase.
- b) The full specialist investigations would be undertaken after 23 February 2021, once the DMRE has reached a decision on the finalised Scoping Reports for the applications.

C. The Department of Sport Arts and Culture (DSAC) 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.

- a) Kindly note the Namakwa District DSAC office has been contacted and notified of the project now in January 2021. DSAC will still have the opportunity to provide inputs during the EIA Phase of the project. Our contact is Mr. Avron Thomas located in Springbok, contact - 063 692 4118 / 065 620 1169. It was initially a challenge to get hold of DSAC in Springbok during the Scoping Phase. It was thereafter brought to our attention that their offices have burnt down and the officials are working from home.
- b) With regards to the Northern Cape Heritage Resources Authority, we have tried to contact Mr Andrew Timothy numerous times during the Scoping Phase and now during January 2021 on the following contact numbers: 053 831 3319 / 060 622 1349. There is no answer and we are directed to his voicemail. He is also not returning any of our calls. We will send him emailed notifications to the following address; Ratha.Timothy@gmail.com.

D. 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.

- a) We would herewith like to thank the Museum for providing valuable inputs in such a short time period. The comments have been received and incorporated into the finalised Scoping Reports.
- b) The comments have also been brought to the attention of the Archaeologist and we are currently addressing your request as per section C above. Kindly note there is another opportunity to participate and comment on the applications during the second round of public engagements as part of the EIA Phase. More in-depth information will be available during this phase.

E. 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.

Naledzi couriered hard copies of the Draft Scoping Reports to Andrew Timothy of the Northern Cape Heritage Resources Agency (NCHRA). We were advised that they had an office at the McGregor Museum and thereafter the parcel was redirected to the Museum.

As mentioned in Section C, we have tried to contact him on several occasions on his mobile phone, however reached his voicemail. Dr Morris, you also confirmed that the cellphone number we were using was correct and in use.

We would highly appreciate your assistance in providing alternative contact details of the NCHRA or connecting us with Mr. Andrew Timothy.

- F. **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.**

Noted. The information currently contained in the Heritage Scoping and DMRE Scoping Reports is desktop based. The existing impacts will be addressed in the full Heritage Impact Assessment Study during the EIA Phase once field investigations have been completed. This comment has been recorded in the final Scoping Reports in Section 2 (d) (iv) 1(a) subsection 1.12.

- G. **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.**

This is correct. Please refer to the response provided in section B above.

- H. **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.**
- I. **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.**

In response to both items H. and I. above; Consultations with the community members in this regard have not taken place during the Scoping Phase. The specialist scoping reports are desktop based and exclude such consultations. The Archaeologist will engage the communities in this regard during the EIA Phase or either combine such consultations with our EIA community engagement meetings. Evidence will be included in the full Heritage Impact Assessment Study. The requirement has been recorded in the finalised Scoping Reports under Section 2 (d) (iv) (1) (a) subsection 1.12.

We again thank you Prof. Morris for your valuable inputs provided thus far.

Regards,

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

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

Date: 20 January 2021

Attention: Ms Alexia Hlengani
Department of Water & Sanitation
Northern Cape Region
Lower Orange Water Management Area
Upington, 8800

Email: hlengania@dws.gov.za
Tel: 054 338 5800

RE: COMMENTS SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

The comments from the Department of Water and Sanitation dated 20 November 2020 refers;

We would herewith like to take this opportunity to thank the department for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Report and submitted to the Department of Mineral Resources and Energy, Springbok.

Electronic copies of the finalised Scoping Reports for both PRAA 1 and PRAA 2, as submitted to DMRE, are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

The issues raised by the department were numbered and we respond accordingly.

Item 1 and 2: Please refer to Section 2e of the finalised Scoping Reports, under Policy and Legislative Requirements, subsection E5 wherein it is stated that the project triggers several Section 21 water uses that require authorisation and a WULA will be submitted to the DWS: Orange-Proto. These water uses include Section 21a, c, f, g and i including an application for exemption/relaxation of the condition imposed by GN 704 will be submitted as part of the overall WULA to the DWS: Upington Regional Office, since excavation and bulk sampling activities and infrastructure will be located within the 1: 50 and 1: 100-year flood line of the Orange River. According to Samara's prospecting method the prospecting focus areas are located within the riverbed and active channel. The processing plant (constructed on skid frame) will be located on the Orange River embankment, above the active channel, not less than 50m from the river bed. See Section 2(d) (ii) of the Scoping Report for a description of the prospecting method.

Item 3: Samara will comply with the relevant sections of the NWA regarding water use. A WULA will be submitted to the DWS: Orange River Proto and all the relevant legislative requirements relevant to the WULA will be listed for compliance.

Item 4 and 5: Noted

Item 6: Samara will engage the Richtersveld Local Municipality to obtain a service agreement for waste removal. The agreement will be included in the Draft EIR & EMPr reports.

Item 7: The recommendation will be included as a mitigation measure in the EIR and EMPR.as part of the mitigation measures for the prospecting and bulk sampling activities.

Item 8 to 10 : Noted.

Item 11: Soil erosion management will be included in the EIR & EMPRs based on the final site plans.

Item 12: The Closure and Rehabilitation Plan will be prepared during the EIA Phase and will form part of the EIR and EMPR documents.

Item 13: Samara intends to stockpile material close to the river bed and embankment for concurrent rehabilitation. It would therefore be essential to formulate mitigation measures to avoid or limit sedimentation based on the prospecting site plan and placement of stockpiles in proximity to the river.

Item 14: Please note prospecting and bulk sampling activities will require the temporary altering the course of the watercourse, bulk sampling excavation in the flood line (both bed and banks), rehabilitation of the bed and banks after excavations.; and the temporary diversion of the watercourse during bulk sampling. Natural flow may also be impeded depending on the methodology employed.

Item 15: Noted this has been stated under Section 2 e 'Policy and Legislative Context', item E5 in the finalised Scoping Reports as requirements in terms of the NWA.

Regards,

A handwritten signature in black ink, appearing to read 'M Botha', with a long horizontal stroke 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

Date: 20 January 2021

Attention: Ms. Bertchen Kohrs

Chair
Earthlife Namibia
P O Box 24829
Windhoek, 9000

Email: earthl@iway.na
Tel: +264 61 227 913

RE: COMMENT SHEET SUBMITTED ON DRAFT SCOPING REPORT FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Earthlife Namibia's comment received on 14 December 2020 refers;

We would herewith like to take this opportunity to thank Earthlife for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Report and submitted to the Department of Mineral Resources and Energy, Springbok.

The comment raised was "*What will happen to all the ambitious plans on the social sectors as was outlined by Dr Dywili and which will raise high expectations amongst the communities if the diamonds will be found?*"

According to Samara they will roll out the Social Development Plan once the Prospecting Rights are granted by the DMRE to Samara and are able to operate in the project area. Once diamonds are discovered and it is found that the area can be economically mined, Samara will apply for the Mining Permit after which the Social Development Plan can be reviewed based on 'past lessons learned'.

Regards,



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

Date: 20 January 2021

Attention: Prof. Norbert Juergens

Director Herbarium Hamburgense HBG
University of Hamburg, Institute of Plant Science and Microbiology
Ohnhorststr .18
Hamburg, Germany, D22609

Email: norbert.juergens@uni-hamburg.de

RE: COMMENT SHEET SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Your comments dated 14 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank you for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Reports and submitted to the Department of Mineral Resources and Energy, Springbok on 11 January 2021.

Electronic copies of the PRAA 1 and PRAA 2 finalised Scoping Reports are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

We herewith wish to respond to your comments in the below section. The comments were numbered and we respond accordingly.

- A. The EIA should mirror the entire PRAA coverage of the almost complete habitat system along the Orange River from near De Hoop to near Grootderm. The large scale PRAA requires an integrated assessment of the Namibian and SA side.**

Please note that this application is for a Prospecting Right with Bulk Sampling, not a full scale mining permit or right. Activities to be conducted on the Orange River will at a small scale basically a 'test' scale and will be implemented in a phased manner (one trench at a time). The entire system will not be prospected at once. A maximum of ten (10) trenches will be excavated (100m x 25 x4m) per application area over a three year period.

The specialist studies currently aim to assess the focus areas including up - and downstream habitats that might be affected by the prospecting activities. The aim is to assess a radius of 1km zone of influence, inland on either side of the river, 500m upstream and 1.5km downstream from the prospecting focus area. It is highly unlikely that the prospecting activities could cause impact beyond these zones of influence.

The specialists studies will also discuss the current cumulative pressures on the Orange River System, but since the proposal is for prospecting, will only be able to discuss this on a qualitative level.

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

According to the Freshwater Ecology Scoping Report attached to the Scoping Reports as Appendix 6; a full Freshwater Ecology Impact Assessment will be commissioned during the EIA Phase and will include a Fish Ecological Survey and Fishway Design to provide for fish migration as a mitigation measure to retain longitudinal habitat connectivity, reduce habitat fragmentation and enhance migratory freedom of fish despite infrastructure development to protect this fisheries resource. This has also been addressed in the Plan of Study for EIA Phase set out in Freshwater Ecological Assessment Scoping Report.

- C. The ancient (almost tertiary?) gravel terraces along the river carry endemic flora and fauna which has not 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 insufficient covered 'blindspot' between the large landscape units in the hinterland and the gallery forest requires an intergrated study on both banks as the gravel terraces have already been heavily degraded by mining on the Namibian side as well.**

The presence of the tertiary gravel terraces along the Orange River has been added to the finalised Scoping Reports in Section 2h(iv)1(a) under subsection 1.7.1. (Vegetation). Please note that the site vegetation types and species descriptions and likely impacts included in the scoping reports are desktop based. These vegetation unit descriptions and likely impacts will be confirmed and verified during in-depth field investigations that will form part of the EIA Phase. We have made your comments available to our appointed Aquatic and Terrestrial Ecologist, SASS Environmental Services, Mr Stephen van Staden for consideration in his specialist assessments. We have also taken the liberty of providing him with your contact details, in case he would find it necessary to engage with you for research purposes.

Regards,



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

Date: 20 January 2021

Attention: Natasha Higgitt

Heritage Officer
South African Heritage Resources Agency (SAHRA)
111 Harrington Street
Cape Town, 8001

Email: nhiggitt@sahra.org.za
Tel: 021-462-4502

SAHRA Ref: Case ID 15798 (PRAA 1) and ID 15799 (PRAA 2)

RE: INTERIM COMMENTS ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Your comments dated 11 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank SAHRA for providing interim comments as part on the draft Scoping Reports and Heritage Scoping Report. The comments have been recorded and addressed in the Final Scoping Reports and submitted to the Department of Mineral Resources and Energy, Springbok on 11 January 2021.

Electronic copies of the PRAA 1 and PRAA 2 finalised Scoping Reports are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php> and will be uploaded onto SAHRIS.

We herewith wish to respond to your comments in the below section.

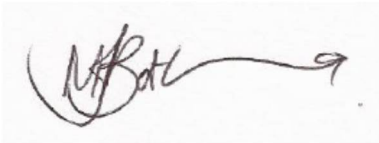
Paragraph 1:

- i. Noted. The requirements have been included as part of the protocols to be followed by specialists. Please refer to Section 2e 'Policy and Legislative Context', subsection E39 of the finalised Scoping Reports.
- ii. The Heritage- and Palaeontological Impact Assessment Reports will comply with protocols:
 - a. SAHRA 2007 Minimum Requirements; and
 - b. ICOMOS Guidance - Prospecting or mining near or in World Heritage Sites requires robust assessment based on ICOMOS Guidance.
- iii. The appointed Archaeologist who prepared the Heritage Scoping Report is Eric Mathoho from Millenium Heritage (Pty) Ltd.
- iv. The HIA reports will separated and produced per application area.

Paragraph 2: The requirement to comply with Section 38 of the National Heritage Act has been included as a requirement in Section 7 'Legal Requirements' of the Heritage Scoping Report.

Paragraph 3: Noted. The draft EIR and appendices will be uploaded onto SAHRIS.

Regards,

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

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Email: botham@naledzi.co.za

Date: 20 January 2021

Attention: Ms Willeen Olivier

Department of Environment, Forestry and Fisheries
The Directorate: Transfrontier Conservation Areas
Environment House
473 Steve Biko Road
Pretoria, 0002

Email: wolivier@environment.gov.za

Tel: 012 399-9581

Your and Our Ref. NC30/5/1/1/2/12663

RE: COMMENTS SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

Your comments dated 15 December 2020 on the above mentioned project refers;

We would herewith like to take this opportunity to thank the DEFF, Directorate: Transfrontier Conservation Areas for providing comments as part of the public participation process. The comments have been recorded and addressed in the Final Scoping Reports and submitted to the Department of Mineral Resources and Energy, Springbok on 11 January 2021.

Electronic copies of the PRAA 1 and PRAA 2 finalised Scoping Reports are available on the Naledzi website at the following link: <http://www.naledzi.co.za/public-documents-naledzi.php>.

We herewith wish to respond to your comments in the below section. The comments were not numbered, we therefore respond as per the headings provided in the department's letter.

A. General Comments on applications

The department's comments on PRAA 2 and PRAA 1 are noted. The legal implication of PRAA 2 has been highlighted in the relevant finalised Scoping Report in Section 2c 'Locality', Section 2e 'Policy and Legislative Context' under items E4, E7 and E8 including Section 2h (iv) 1(a) 'Description of affected environment' subsection 1.7.1 (Vegetation).

The legal implication on the northern portion of PRAA 1 has been addressed in the relevant finalised Scoping Report in Section 2c 'Locality' and Section 2e 'Policy and Legislative Context'. We advise in the scoping report in Section 2h (viii) '*Outcome of final site selection/Final Site Layout Plan*' that the northern portion of PRAA 1 should be excluded from the overall application area (see Figure overleaf) to avoid conflict with the NEMPAA, 2003.

SAMARA MINING (PTY) LTD

KEY PLAN - PROSPECTING RIGHT AREA

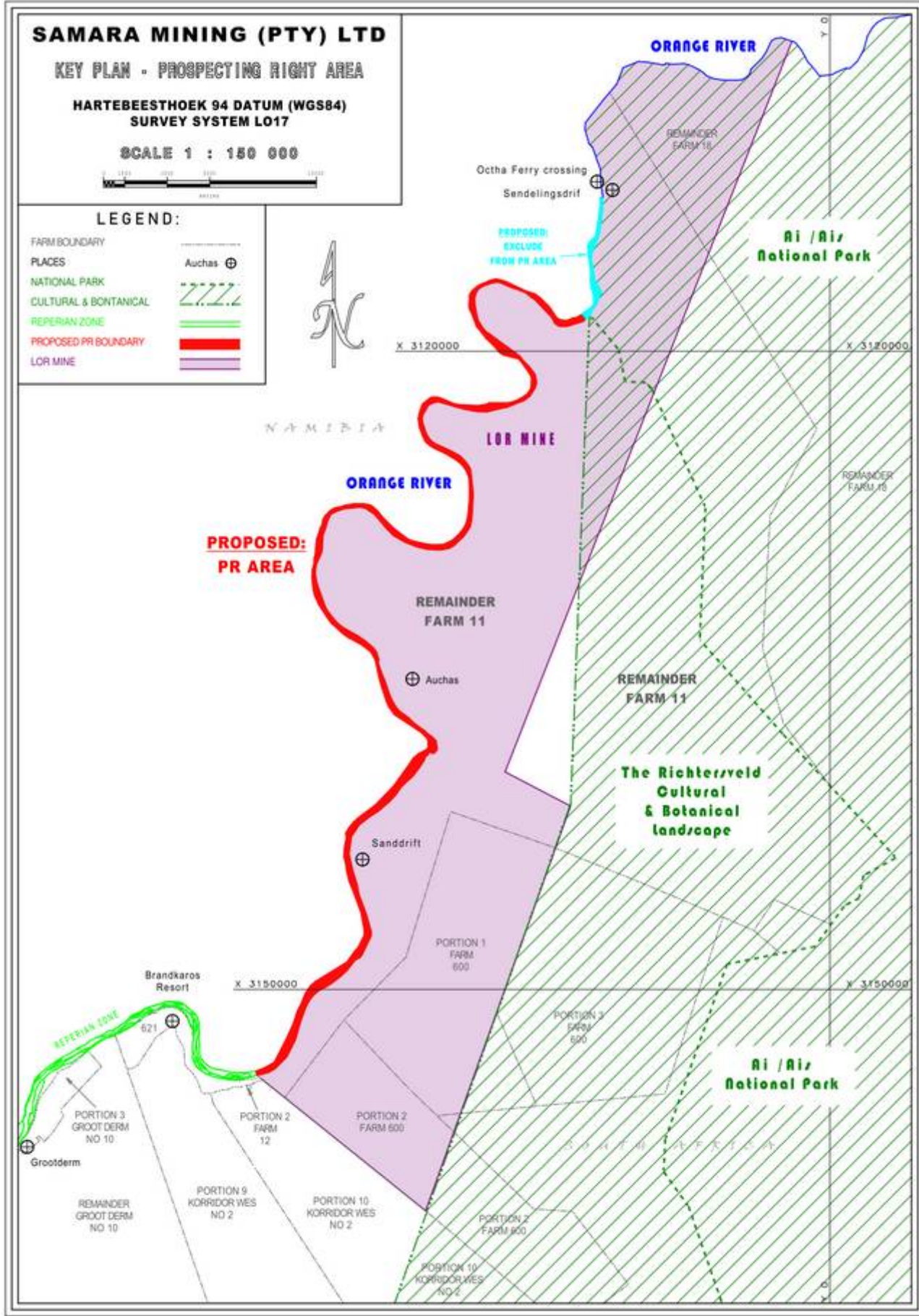
**HARTEBEESTHOEK 94 DATUM (WGS84)
SURVEY SYSTEM LO17**

SCALE 1 : 150 000



LEGEND:

FARM BOUNDARY	---
PLACES	Auchas ⊕
NATIONAL PARK	Diagonal hatching
CULTURAL & BOTANICAL	Dashed line
REPERIAN ZONE	Green wavy line
PROPOSED PR BOUNDARY	Red line
LOR MINE	Purple shaded area



However please note that this is not the preferred Site Plan for Samara. Samara seeks the opportunity to prospect and bulk sample for alluvial diamonds on the entire extent of the application area. Samara is aware of the legal implication, yet are convinced that the land uses can coexist and the economic advantages of prospecting within the entire extent of PRAA 1 should be considered. According to Samara the Richtersveld and surrounding areas are severely affected by poverty and unemployment and there are significant socio-economic advantages for the Richtersveld Community from the proposed prospecting applications. Samara proposes to implement a Social Development Plan as part of the prospecting right activities which will contribute to job creation and skills development.

Even so, the DMRE will need to reach a decision based on the data presented in the final Scoping Reports.

B. International Implications, SADC Treaties and Agreements:

The relevant TFCA structures/representatives will be consulted during February 2021 and as part of the EIA Phase, we are currently gathering the relevant contact details.

Thank you for highlighted the SADC Treaties, it has been noted, specially the SADC Protocol on Shared Watercourses. Naledzi has been in consultation with ORASECOM's Executive Secretary, Mr Lenka Thamae since the start of the EIA Process. Mr Thamae has confirmed receipt of all the reports, notifications and invitations to the virtual meetings. He has confirmed that ORASECOM takes note of the applications and will review and comment on the draft Environmental Impact Reports & Environmental Management Programmes including Water Use License Application reports for the applications since the Scoping Phase only provides preliminary information.

We have engaged with DIRCO on 19 January 2021 and submitted a written request for verification of the exact location of the international border between South Africa and Namibia. We are still waiting for DIRCO's confirmation. Naledzi's take from the consultation would be to obtain written confirmation on the location of the border and a surveyed border line that can be included on the prospecting site plan. The map will be used to engage Namibian authorities to determine any possible implications that need to be addressed and for inclusion in the draft EIR and EMP documents.

C. Stakeholder engagement:

The aim of the EIA Process public engagements are not for the purposes of obtaining landowner consent. The community engagements would aim to provide project information and give the community the opportunity to gain clarity on aspects thereof. It will further allow the community to provide inputs on the possible consequences and disclose their overall point of view.

Obtaining landowner consent, and any potential lease agreement that might emanate from this application (if applicable) will need to be dealt with through a separate process, which must be followed independently by the applicant (Samara). Samara has referred to this process during the virtual meetings as being the broader consultation process that they intend to follow.

Minister of Rural Development and Land Reform is the nominal landowner of the application areas and is represented by the Northern Cape Department Rural Development and Land Reform (DRDLR), Mr. Itumeleng Mashune in this EIA Process. The informal land rights holders, are the community members of Sanddrift, Kuboes, Lekkersing and Eksteenfontein.

Naledzi has not had the opportunity to engage the community 'face-to-face' during the Scoping Phase due to the risk of Covid-19 in the Richersveld area and due to the prohibition placed on public gatherings by the Covid-19 regulations of 29 December 2020 and 12 January 2021 respectively. We therefore aim to engage the communities as soon as the Covid-19 regulations allow it. Probably only after 15 February 2021. All the project information will be shared at the meetings.

Samara will be present at the community engagements to provide project background, provide an overview of the planned Social Development Plan and to discuss the requirements for landowner consent. DRDLR have requested to form part of the EIA Process community meetings as the nominal landowner and to witness the engagements and way forward for negotiation for landowner consent.

With regards to the TFCA structures, Orasecom and DIRCO please refer to response provided in Section B above.

We will engage DWS (responsible for bilaterals with Namibia), DEFF Forestry and the DEFF World Heritage Section during February 2021 and during the EIA Phase.

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

Date: 20 January 2021

Attention: Ms Willeen Olivier

Department of Environment, Forestry and Fisheries
The Directorate: Transfrontier Conservation Areas
Environment House
473 Steve Biko Road
Pretoria, 0002

Email: wolivier@environment.gov.za

Tel: 012 399-9581

Your and Our Ref. NC30/5/1/1/2/12663

RE: COMMENTS SUBMITTED ON DRAFT SCOPING REPORTS FOR THE EIA PROCESS AND WULA FOR SAMARA MINING (PTY) LTD'S TWO PROSPECTING RIGHT APPLICATIONS ON THE LEFT BANK OF THE ORANGE RIVER, RICHTERSVELD, NAMAKWA DISTRICT, NORTHERN CAPE PROVINCE OF SOUTH AFRICA

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SAMARA MINING (PTY) LTD

KEY PLAN - PROSPECTING RIGHT AREA

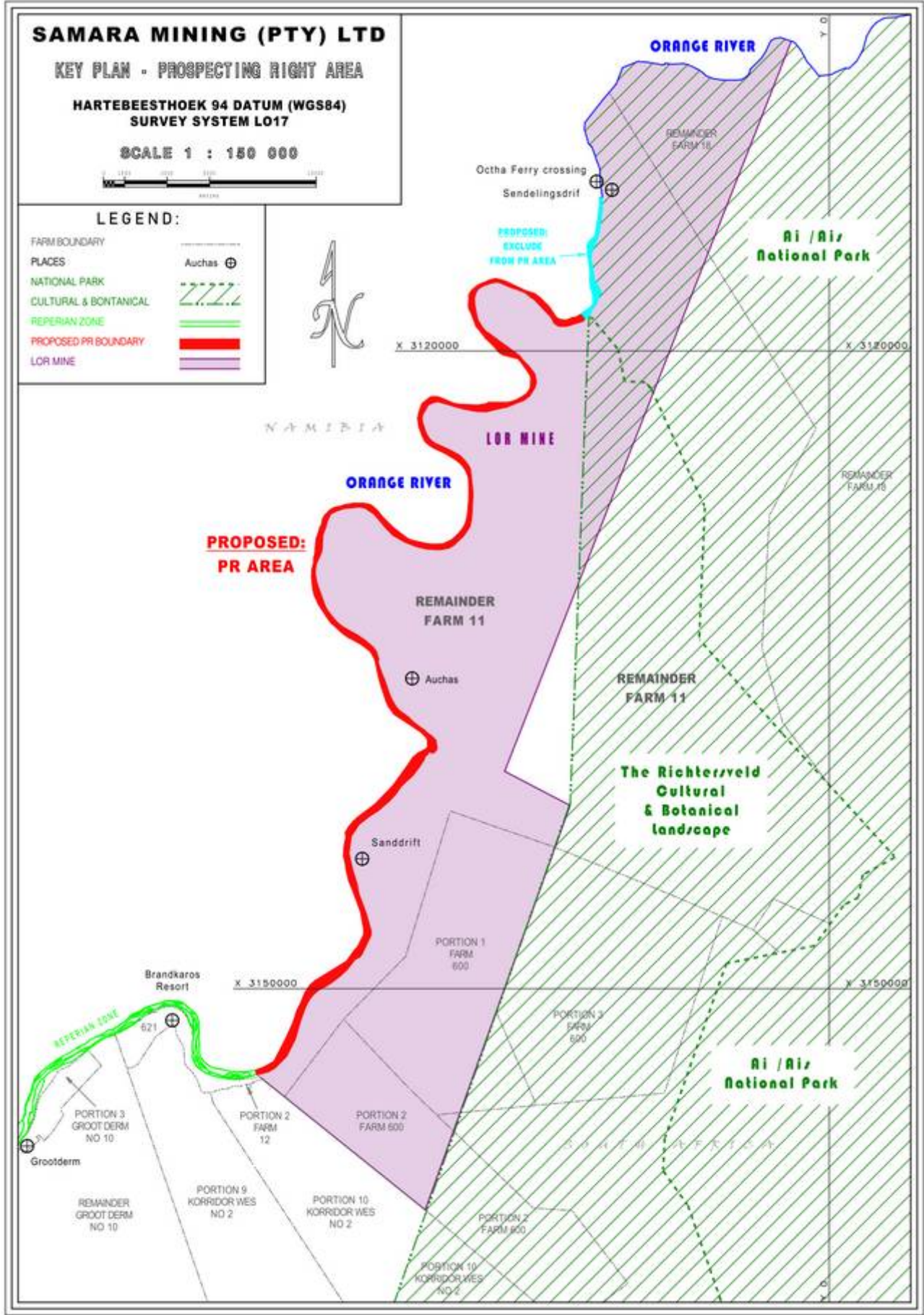
HARTEBEESTHOEK 94 DATUM (WGS84)
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Even so, the DMRE will need to reach a decision based on the data presented in the final Scoping Reports.

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The relevant TFCA structures/representatives will be consulted during February 2021 and as part of the EIA Phase, we are currently gathering the relevant contact details.

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We have engaged with DIRCO on 19 January 2021 and submitted a written request for verification of the exact location of the international border between South Africa and Namibia. We are still waiting for DIRCO's confirmation. Naledzi's take from the consultation would be to obtain written confirmation on the location of the border and a surveyed border line that can be included on the prospecting site plan. The map will be used to engage Namibian authorities to determine any possible implications that need to be addressed and for inclusion in the draft EIR and EMP documents.

C. Stakeholder engagement:

The aim of the EIA Process public engagements are not currently for the purposes of obtaining landowner consent. The community engagements would aim to provide project information and give the community the opportunity to gain clarity on aspects thereof. It will further allow the community to provide inputs on the possible consequences and disclose their overall point of view.

This will be confirmed during the EIA Phase engagements, but according to the EAP's understanding and experience in past mining applications, obtaining landowner consent, and any potential lease agreement that might emanate from this application (if applicable) will need to be dealt with through a separate engagement process, which must be followed independently by the applicant (Samara) facilitated by DRDLR. Samara has referred to this process during the virtual meetings as being the broader consultation process that they intend to follow.

The Minister of Rural Development and Land Reform is the nominal landowner of the application areas and is represented by the Northern Cape Department Rural Development and Land Reform (DRDLR), Mr. Itumeleng Mashune in this EIA Process. The informal land rights holders being the community members of Sanddrift, Kuboes, Lekkersing and Eksteenfontein.

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Samara will be present at the community engagements to provide project background, provide an overview of the planned Social Development Plan and to discuss the requirements for landowner consent. DRDLR have requested to form part of the EIA Process community meetings as the nominal landowner and to witness the engagements and way forward for discussions on landowner consent.

With regards to the TFCA structures, Orasecom and DIRCO please refer to response provided in Section B above.

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Regards,

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