



**De Beers Consolidated Mines (Pty) Ltd
Venetia Limpopo Nature Reserve Lodge
Comment and Response Report**

March 2021

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Project Ref – 141/002

Prepared by: Suzanne van Rooy



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VERSION CONTROL

Alta van Dyk Environmental cc

Version: Draft

Approved by: Alta van Dyk

Signed:

A handwritten signature in black ink, appearing to read "Alta van Dyk", is written over a dotted line.

Position: Environmental Specialist

Date: March 2021

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1 INTRODUCTION AND BACKGROUND

De Beers Consolidated Mines (Pty) Ltd (De Beers) is the owner of the Venetia Limpopo Nature Reserve (VLNR) in the Limpopo Province and proposes to develop a lodge facility in the reserve for senior management employees. The proposed Lodge will comprise of 12 rooms and a communal facility.

The VLNR is located in the northern most parts of the Limpopo Province, in the Musina Local and Vhembe District municipalities. The reserve is directly south of Mapungubwe National Park and is bordered by the R572 to the North and the R521 to the West. De Beers' Venetia Mine Mining Rights Area borders the Reserve to the south. The proposed VLNR Lodge is located directly north and adjacent to the Lizzulea Dam, which is situated in the eastern part of the Reserve.

The proposed VLNR Lodge will include the following facilities:

- Gravel access road (existing road to be used)
- 12 rooms (24 people maximum) with parking bays
- Central building (kitchen and dining area)
- Swimming pool and lapa
- Storeroom
- Electrical boundary fence
- Reception and administrative office
- General storage waste storage facility
- Staff quarters and locker room

The stakeholder engagement process associated with the environmental authorisation process focused on obtaining comments and concerns regarding the proposed project from stakeholders. These include authorities, landowners, adjacent landowners as well as interested and affected parties. This document contains all comments received from stakeholder, as well as the relevant responses.

2 COMMENTS AND RESPONSES

Throughout the environmental authorisation process, stakeholders were invited to raise comments and concerns for evaluation. Opportunities were provided for stakeholders to comment during pre-application meetings, and by completing and returning comment sheets, emails or verbally by phone.

Table 1 captures comments received and noted from stakeholders during the pre-application phase and the comment period for the Draft Basic Assessment Report (BAR).

Table 1: Comment and Response table for the proposed VLNR Lodge project

Nr	Comment/Question	Commentor	Organisation/ Community	Date	Source	Response
1.	Basic Assessment Reports to be sent to the municipality for commenting.	Musina Municipality Council	Musina Local Municipality	6 October 2020	Minutes	The Draft BAR was submitted to the municipality for comment on 4 February 2021.
2.	Confirmation that the VLNR will be on De Beers owned land.	Musina Municipality Council	Musina Local Municipality	6 October 2020	Minutes	The proposed VLNR Lodge is located on the farm Lizzulea 62 MS Portion 0 that is owned by De Beers Consolidated Mines.
3.	Please include a geotechnical study as part of the application.	Rhulani Mthombeni	Limpopo Department of Economic Development, Environment and Tourism	2 November 2020	Minutes	The geotechnical study is available in Appendix G1 of the Final BAR.
4.	Will the lodge be open to the public?	Byron Elston	Abend Ruhe Gotha	5 November 2020	Minutes	The proposed Lodge will be a non-commercial facility and will only be available for use by De Beers management personnel.
		Morné Brummer	Corea Game Lodge	5 November 2020	Minutes	
		Letsie Coetzee	SANParks – Mapungupwe	5 November 2020	Minutes	
5.	When does De Beers intend to start construction of the VLNR Lodge?	Graham Jacobs	Abend Ruhe Gotha	5 November 2020	Minutes	De Beers would like to start construction in Q1 of 2021.
7.	The VLNR falls within the buffer zone of the Mapungubwe UNESCO World Heritage Site and therefore a heritage study will be very important. The development of a lodge facility within the buffer zone is an acceptable activity.	Letsie Coetzee	SANParks – Mapungupwe	5 November 2020	Minutes	A Heritage Assessment was undertaken by Heritage Contracts and Archaeological Consulting. The report is available in Appendix D5 of the Final BAR.

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8	<p>Kindly confirm the access road to the Lodge?</p> <p>Will De Beers upgrade the access road from the Mine to Luna Gate (D1559)?</p>	Henri van Vuuren	Koedoe Rest Camp	18 February 2021	Phone call	<p>The existing gravel road from Luna Gate to the proposed Lodge will serve as the access road. General maintenance on this access road will be required and will form part of the development. This includes general grading and stormwater management.</p> <p>The gravel road (D1559) that connects Luna Gate with the D2692 road (tar road to Venetia Mine) is a district road and does not belong to De Beers. There are no current plans to upgrade this road.</p>
9.	<p>The Department advice the involvement of a geotechnical specialist to compile a report that inter alia assess the proposed development against the geotechnical characteristics on site, soil forms, soil profile, presence of problem soils, shallow water table and geotechnical constraints. Kindly submit the said report as per the commitment made during the consultation phase with the Department</p>	SW Mothapo/ RV Mthombeni	Limpopo Department of Economic Development, Environment and Tourism (LEDET)	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	<p>The geotechnical study is available in Appendix G1 of the Final BAR.</p>
10.	<p>The Musina Local Municipality must be engaged regarding application for rezoning in terms of Musina Land Management Scheme 2010.</p>	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	<p>A pre-application meeting was held with the Musina Local Municipality on 6 October 2020. Refer to Appendix E3 of the Final BAR for the minutes of the meeting.</p> <p>A special consent application was submitted to the municipality on 19 March 2021. Refer to Appendix G2 of the Final BAR for a copy of the application letter.</p>

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11.	The Department request for an engineering service report that details out how the developer will address the required bulk services for the proposed development i.e. sewage, solid waste, water and electricity. The report should reflect the require demand for the proposed development and envisaged means of supply for such services.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	Please refer to Appendix G3 for the Engineering Service Report.
12.	A PPP must be done in accordance to Chapter 6 of the EIA Regulation 2014.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	Refer to Table 9 in the Final BAR.
13.	A register for all Interested and Affected Parties must be established and appended to the report. I&APs should not be limited to the following, South African Heritage Resources Agency, Department of Water and Sanitation, SANParks, Musina Local Municipality, Vhembe District.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	Refer to Appendix E9 of the BAR for a complete list of stakeholders consulted during the pre-application phase and Draft BAR public comment period.
14.	Proof of placement of site notice must be provided, by means of a clear and legible image.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	Refer to Appendix E7 of the Final BAR for a copy of the site notice, photographs and a map of where the site notices were placed.
15.	The Department request for submission of the specialist declaration forms from each of the	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email	Email/letter	Refer to Appendix D1 of the Final BAR for the specialist declaration forms.

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	specialist involved in the compilation of the BAR.			on 12 March 2021.		
16.	Kindly determine whether the preferred site falls within a 1:50 year flood zone. It has been note that according the specialist, the site falls outside the 1:100 year flood zone.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	Refer to Appendix D7 of the Final BAR for the updated Surface Water Report, including the 1:50 year floodline. The proposed VLNR Lodge falls outside the 1:50 year floodline.
17.	Please note you have until the 8 th of March 2021 to submit BAR for decision. Please provide one (1) hard copies and one (1) soft copy of the BAR upon submission.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	<p>The comments on the Draft BAR were received via email from LEDET on 12 March 2021, which is four days past the mentioned deadline for submission of the Final BAR. A request was emailed back to LEDET to query this date, however, no feedback was received.</p> <p>The Final BAR and supporting documentation will be submitted to LEDET before 1 April 2021, as per the acknowledgement of an application letter sent by LEDET on 28 January 2021.</p> <p>Refer to Appendix E10 of the Final BAR for letters received from LEDET.</p>
18.	The Department request for the amendment of the Environmental Management Programme to align each activity to be undertaken during various phases (Construction, Operation and Decommission) of the proposed development with the respective biophysical and socio-economic aspects of the environment (i.e. land, water, air, social, economic) that will be impacted upon.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	Refer to Table 6 and Table 7 of the EMPr (Appendix F of the Final BAR). The tables present the environmental (biophysical and social) aspects that will be impacted by the proposed Lodge development, the management outcomes, potential impact, the significance rating, the proposed mitigation measures to management the potential impacts, as well as the responsible person to implement these management measures. Table 6 presents the construction

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	Furthermore, the impact rating, mitigation measure and responsible person to implement mitigation measure must be incorporated.					<p>phase and Table 7 present the operational phase. As the proposed Lodge will be a permanent facility, a decommissioning phase was not included.</p> <p>Should the proposed Lodge ever be decommissioned, the required environmental authorisations will be obtained.</p>
19.	In addition to the above, please address waste generation (general & hazardous), ablution facilities, handling of hazardous substances, alien and invasive plant species, construction camp management, excavation and awareness on construction personnel.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	<p>Please refer to the following sections in the EMPr (Appendix F of the Final BAR):</p> <ul style="list-style-type: none"> • Hazardous waste generation: Refer to Section 6.4. Hazardous waste will be managed according to De Beers' Ecology Division Waste Management Procedure. Refer to Annexure B of the EMPr (Appendix F of the Final BAR). • General waste generation: Refer to Section 6.4. General waste will be managed according to De Beers' Ecology Division Waste Management Procedure. Refer to Annexure B of the EMPr (Appendix F of the Final BAR). • Handling of hazardous substances: Chemicals, hydrocarbons and other hazardous substances will be safely stored, as per the management measures in Table 6 and 7 in the EMPr (Appendix F of the Final BAR). • Alien and invasive plant species: Refer to Section 6.6. The alien and invasive plant species will be managed according to De Beers' Ecology Division Overarching Reserve Management Plan. Refer to

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						<p>Annexure D of the EMPr (Appendix F of the Final BAR).</p> <ul style="list-style-type: none"> Construction camp management: Refer to Section 6.3 of the EMPr (Appendix F of the Final BAR). Awareness on construction personnel: Refer to Chapter 8 of the EMPr (Appendix F of the Final BAR). <p>Excavations are limited to building foundations only.</p>
20.	During the amendment of the EMPr, more effort must be made to construction phase. Kindly ensure that all the requirements provided in Appendix 4 of the EIA Regulation 2014 are addressed.	SW Mothapo/ RV Mthombeni	LEDET	Letter dated 03/03/2021, but received via email on 12 March 2021.	Email/letter	<p>Refer to Table 1 in the EMPr (Appendix F of the Final BAR). This table lists all the requirements of Appendix 4 of the EIA Regulations (as updated in 2017) and references where it addressed in the EMP.</p> <p>Construction related impacts are documented in Section 5.1 and Table 6 provides for the proposed management measures.</p>