

November 2022

## BACKGROUND INFORMATION DOCUMENT (BID)

### Purpose of the BID

- Provides you as interested and/or affected party (I&AP) with an overview of the project and EIA process
- Invites you, as I&AP to participate in the required Public Participation Process
- Provides you the opportunity to contribute and participate in the formulation of the Scoping and EIA reports
- Gives you, as an I&AP the opportunity to provide the EIA team with your comments, concerns and objections to the proposed project.

### You can achieve this by:

- Reviewing the BID and registering as an I&AP by completing the attached registration form (page 10)
- Writing a letter, contacting us/ by sending an email/ chatting to us telephonically
- Giving comments, raising issues/concerns about the project **on or before 5 DECEMBER 2022.**
- Attending the schedule **public meetings** on 16 and 17 November 2022 (refer to page 8)

**Registrations and comments must be submitted on or before 5 DECEMBER 2022.**

### CONTACT DETAILS OF THE EAP:

Naledzi Environmental Consultants  
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### NABAS DIAMONDS (PTY) LTD 'Proposed Grasdrift Mine'

#### NOTICE OF AN ENVIRONMENTAL IMPACT ASSESSMENT

##### (EIA) PROCESS FOR:

**Application for Environmental Authorisation and Waste Management License for a Mining Right Application and associated Water Use License Application for 'Grasdrift Mine' located on the left bank of the Orange River on the Remainder of the Farm Richtersveld No. 11 (Grasdrift), Richtersveld, Namakwa District, Northern Cape Province (South Africa)**

### 1. Project Background and Locality

Nabas Diamonds (Pty) Ltd (applicant) currently holds a registered prospecting right (NC 30/5/1/1/2/501 PR) for **alluvial diamonds** on the Remainder of the Farm Richtersveld No. 11 (Grasdrift) located on the left bank of the Orange River within the Ai Ais Richtersveld National Park and has now applied to the Department of Mineral Resources and Energy: Springbok (DMRE) for a mining right (**DMRE Ref. NCS 30/5/1/2/2/10211 MR**) over the same area. The Richtersveld Nama community is a direct shareholder in Nabas Diamonds, through the Nabas Trust established in 2006.

The proposed mining right area (MRA) is approximately 2692 ha in extent and located 140km east of Alexander Bay and 250km north of Springbok in the Richtersveld Local Municipality within the Namakwa District Municipality in the Northern Cape Province of South Africa. Access to the proposed mine right area is via an 80km secondary gravel road through the Richtersveld National Park and site across from Namibian town Aussenkehr. (Refer to **Figures 1 on page 2**).

Drilling and bulk sampling conducted in 2019 under the prospecting right at Grasdrift indicates there is more than 250, 000 carats of high-value diamonds present which can be mined over a 30 year period using conventional open cast mining methods i.e. loading, hauling and mineral processing by means of Standard Rotary Pan Plants. The mining operation will be known as 'Grasdrift Mine'.

Part of the process of obtaining mineral rights for 'Grasdrift Mine', the applicant is required to obtain numerous environmental permits and licenses under the provision of several sets of legislation detailed further in the sections below.

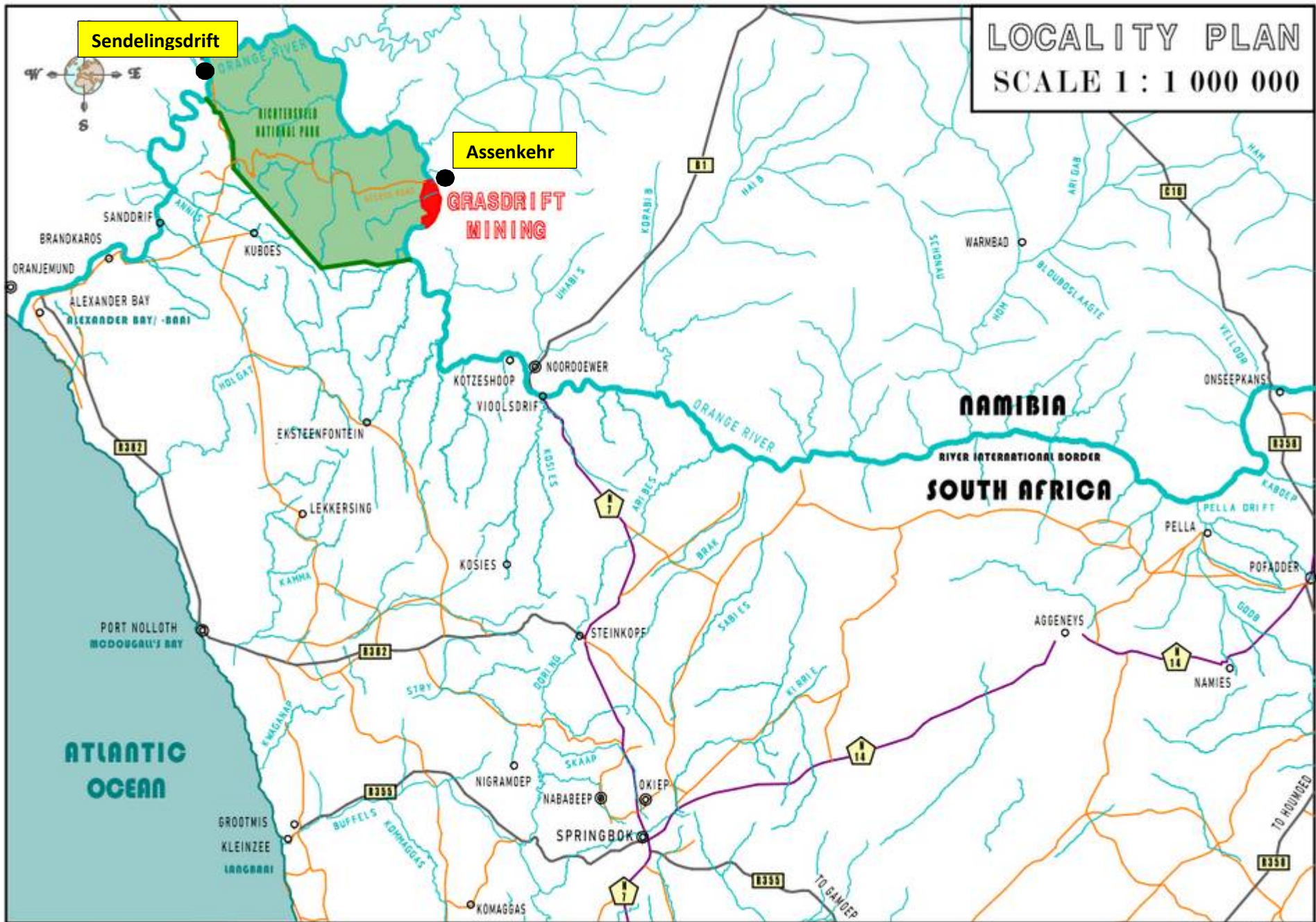


Figure 1: Locality Plan showing the location of 'Grasdrift Mining' site on the left bank of the Orange River in Richtersveld National Park (Courtesy of 'To the T Drafts' produced for NDI Geological Consulting Services)

### 3. Project Description

The Grasdrift Mine will use open cast mining methods to extract the diamonds i.e. loading, hauling and mineral processing by means of Standard Rotary Pan Plants including final extraction through a Final Recovery Plant. The mining process will involve mechanised removal of overburden i.e. removal of vegetation (>20ha), excavation of sand and boulders to expose the diamond-bearing gravel along the Orange River. The mined-out material will be loaded into excavators and Front End Loaders will load the minerals onto a dump truck and ADT's. The RoM will be hauled to the processing plants for the diamond recovery and waste to overburden and waste stockpiles for later use in the rehabilitation of all disturbed areas.

The estimated processing capacity of the mine (Run of Mine) will be 300 000 tons/month. The mine property will be divided into 3 sections with a single mineral processing plant established in each of the 3 sections (Refer to **Figure 2, page 4** and **Annexure A for a Key Mine Site Plan**). Some of the infrastructure required for the mine operation has already been established during the prospecting period and an additional 9.4 ha of mine infrastructure will be established in the mine site

The infrastructure and services required for the mine either existing or to be constructed include:

- Existing access and haul roads will be used (established during prospecting operations).
- Existing brick buildings and steel structures owned by the mine (from prospecting operations) will be refurbished and reused as an office.
- < 1ha Parking areas will be required.
- **A Mineral Processing Plant** established in each of the 3 sections on the mine property comprising each:
  - A Rotary Pan covering > 0.5ha (i.e. 3 plants @ 0.5ha = 1.5ha)
  - A Final Recovery Plant covering 0.5ha (i.e. 3 plants @ 0.5ha = 1.5ha)
  - A **Slimes / Tailings Dam** ranging in size at each plant i.e. 1ha, 1ha and 2.97ha. The minimum holding capacity requirement of each slimes dam is 110 000m<sup>3</sup>/month.
  - Processing Plant processing capacity will be 71 000 tons/month;
  - Sand will be screened out before passing through the processing plant and a close circuit system will be used to decrease slime and water usage through the processing plant.
- **6 ha Pollution Control Dam**
- **3 Topsoil stockpile areas (each <0.5ha)** for the temporary storage of topsoil which will be used for rehabilitation of disturbed areas.
- **23.5 m<sup>3</sup> Diesel storage** (23m<sup>3</sup> storage tank and 0.5m<sup>3</sup> trailer)
- **< 0.5ha Contractor's laydown area**
- Dust suppression
- Stormwater management infrastructure

**Services required for the mine include:**

- **Water Requirements:**
  - 270 000m<sup>3</sup> of water will be abstracted from the Orange River for mine process and potable water;
    - Potable water will be stored in JoJo Tanks
    - Process water will be stored in three dams (3x 0.5 ha = 1.5ha)
  - A water transmission pipeline will be used to transfer water from the river to the processing plants;
  - An average of 80 000 - 100 000m<sup>3</sup>/month of water will be required per month
- **Electricity Supply** - Power generators will be used to supply electricity to the plants, accommodation areas and the water pump.
- **Sewage** - Ablution facilities and a Sewage Treatment Package Plant will be constructed.

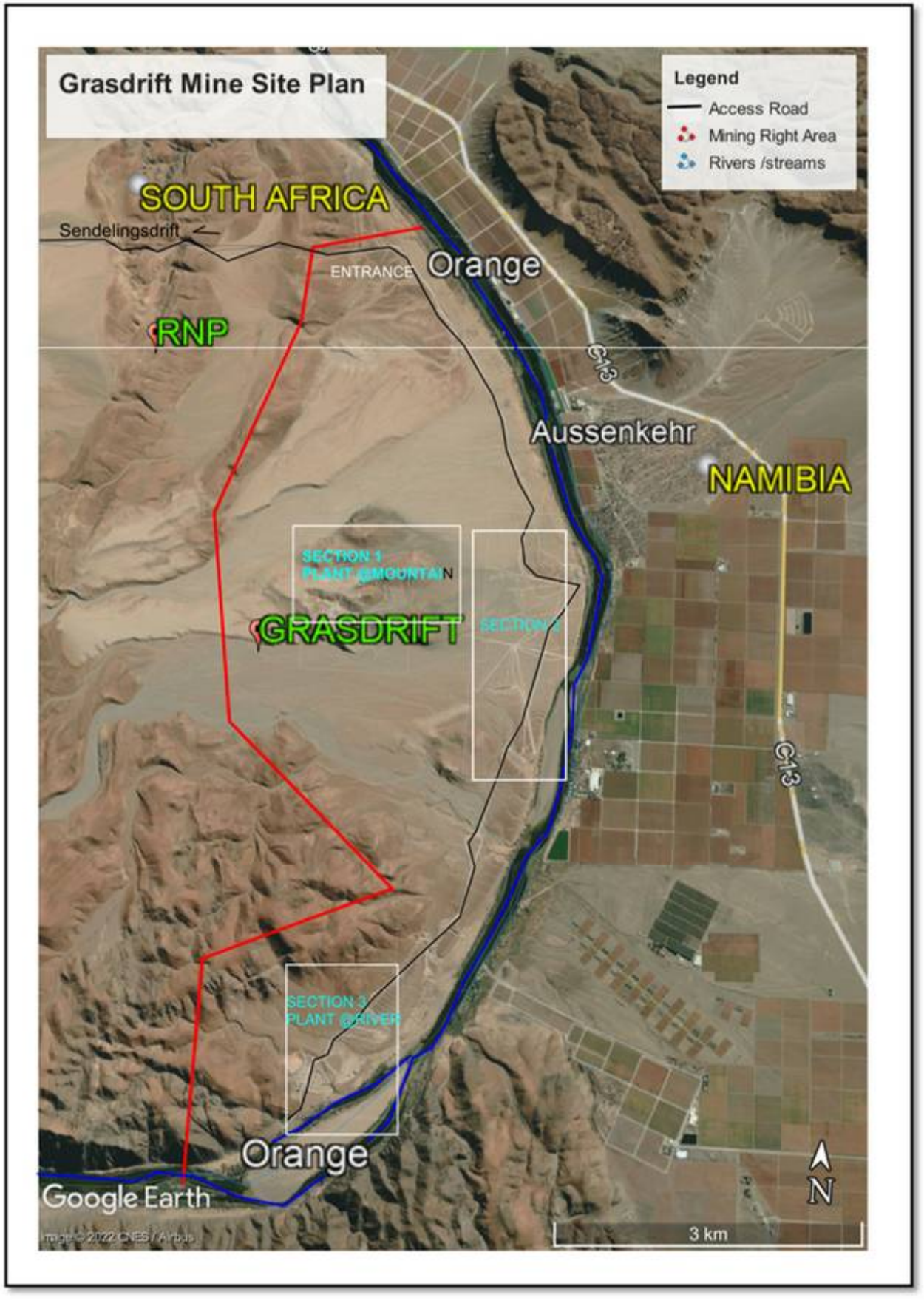


Figure 2: Mining Right Area (red polygon) and mining sections located on the left bank of the Orange River, superimposed on Google Earth Satellite imagery (See Annexure A for more detailed Key Site Plan)

## 5. Relevant Legislation

The proposed project triggers a number of listed activities in Government Notice (GN) No. R. 324, R. 325 and R. 327 of 7 April 2017 (as amended), which require environmental authorisation in terms of the 2014 EIA Regulations (GNR 326) published under the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA). A number of waste management activities listed under GN R. 633 and R. 921 published under the National Environmental Management: Waste Act (Act 28 of 2008) (NEM: WA) are also triggered which require a waste management license. Both applications are subject to a full Scoping and EIA Process.

The following listed activities require approval:

**Table 1: Possible List of Triggered Activities (These activities will be confirmed/refined during the EIA process)**

<b>NEMA Listing Notice</b>	<b>Possible Activities Triggered</b>
<b>▪ Environmental Authorisation</b>	
<b>1 (GN R. 327)</b>	Activity 12, 19, 25 (potentially), 27
<b>2 (GN R. 325)</b>	Activity 17
<b>3 (GN R. 324)</b>	Activity 10 (potentially), 12, 14
<b>NEM: WA List of Activities</b>	
<b>▪ Waste Management License</b>	
<b>GN R. 633</b>	Activity 11
<b>GN R. 921 (Category A)</b>	Activity 10, 12
<b>GN R. 921 (Category B)</b>	Activity 1 and 10

Nabas will also submit a Water Use License Application (WULA) in terms of section 40 of the National Water Act (Act 36 of 1998) (NWA) to the Department and Sanitation (DWS): Orange Proto in Upington for water uses specified under Section 21 (a), (b) (c), (g), (i) and possibly 21 (j). The applicable water uses include:

- S 21a - Abstracting water from the Orange River (270 000m<sup>3</sup>/annum)
- S 21b – Storing of process water in three (3) dams
- S21c and i – Mining activities within the regulated area of the Orange River / streams
- S21g – Construction and operation of onsite waste disposal facilities (i.e. Sewage Package Plant, x3 Tailings Dams, Pollution Control Dam) and dust suppression.

## 6. Environmental Assessment Practitioner

Naledzi Environmental Consultants (Pty) Ltd has been appointed as the independent environmental assessment practitioner (EAP) to undertake the EIA process and WULA and will conduct the integrated public participation process which fulfils both the requirements of NEMA and the NWA.

Our BID notice provides members of the public with information regarding the project and will allow the reader to:

- Determine whether they are an I&AP;
- Understand the project in order to provide informed comments;
- Understand the EIA process in order to participate meaningfully;

## 7. Scoping and EIA Process

The EIA process identifies the potential environmental impacts of a proposed activity and recommends mitigation measures to minimise/avoid such impacts. The main purpose of the EIA process is to inform the DMRE and the public of the environmental consequences of the project, should it be authorised. The EIA process is conducted in line with regulation 21 – 24 of the 2014 EIA Regulations (GN R. 326) and comprises three phases and generates four sets of information i.e.

- **Scoping Phase**
  - Background Information Document (BID – this document) to announce the project
  - Draft Scoping Report (DSR)
- **Impact Phase**
  - Draft Environmental Impact Report (EIR) and Environmental Management Programme (EMPr) inclusive of Specialist Studies
  - Mine Closure and Rehabilitation Plan
- **Decision-Making Phase** - DMRE decision is issued.

As part of the Scoping Phase, a BID document will be distributed to serve as notification of the commencement of the EIA process and call for registration and initial public comments. During this phase, the potential negative and positive impacts relevant to the proposed mining operation will be identified to determine the aspects to be focused on during the Impact Phase. The potential impacts will be identified through initial desktop analysis, environmental screening and site verification, initial specialist inputs including comments received from the public and key commenting authorities and past experience from similar projects. The information will be consolidated and presented in a Scoping Report and will be subject to 30 days of public review and comment before being submitted to the DMRE for approval.

Once the DMRE accepts the Scoping Report the impact phase will commence by conducting specialist studies and preparing the draft Environmental Impact Report (EIR) which evaluates all impacts and issues identified during the Scoping Phase. The EIR will provide an overview of the potential impacts, rank and quantify the impacts and prescribe mitigation measures to minimise negative impacts to acceptable levels.

An auditable Environmental Management Programme (EMPR) will also be prepared that recommends environmental management specifications for the construction, operation, closure and rehabilitation of the mine that need to be observed by Nabas Diamonds. The reports will be released for 30-days public review, followed by the second round of public engagement. The reports will be updated with public inputs and submitted to DMRE for decision-making. DMRE will reach a decision on the application within 107 days. I&APs will be notified of the outcome and afforded a 20-day appeal period on the decision.

The EIA process comprises the following basic steps:

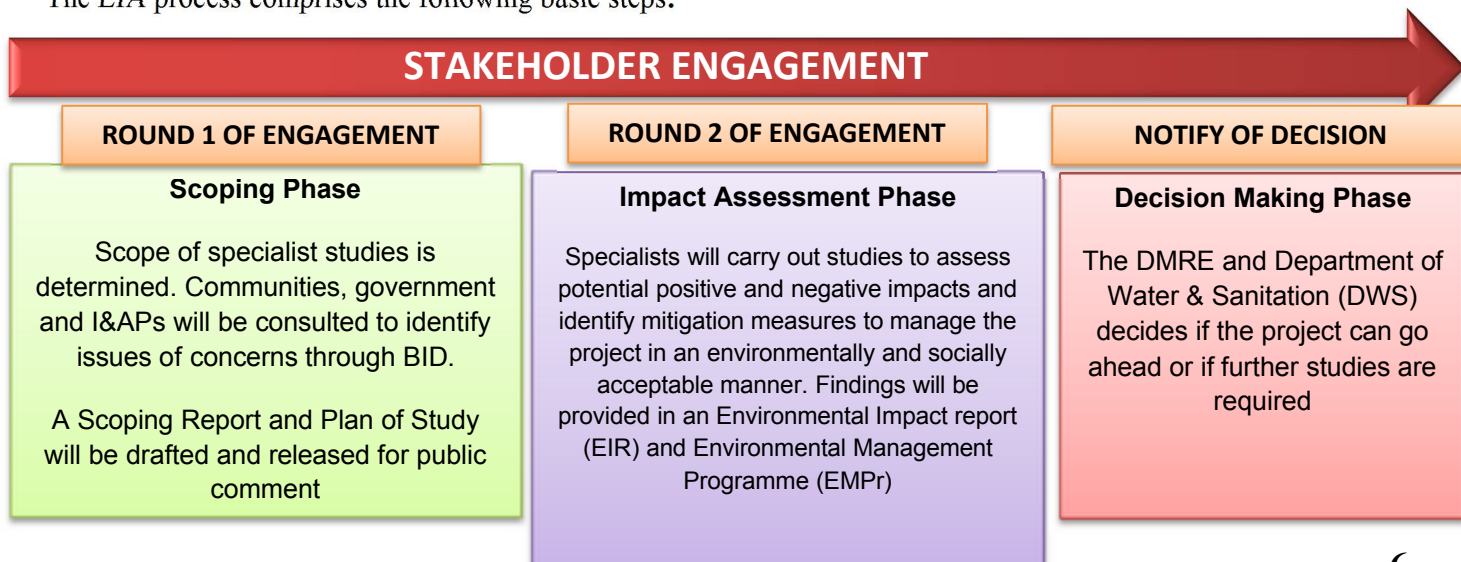


Figure 3: Basic Illustration of the EIA process phases

## 8. Potential Impacts and Specialist Inputs Required

Specialist Studies are a crucial component of the EIA process and form the basis of the integrated EIR and EMPr for the proposed project. Based on the nature of the project and the DFFE GIS-based National web-based Environmental Screening Tool several specialist studies are required and will be commissioned as part of the EIA process to evaluate the site aspects and potential environmental and social impacts relevant to the project:

- Heritage Impact Assessment and desktop Palaeontological Assessment
- Surface Water Impact Assessment incl.
  - Mine Water Balance
  - Flood Line Assessment
  - Conceptual Stormwater Management Plan
- Groundwater Impact Assessment
- Aquatic Biodiversity and Wetland Impact Assessment (incl. Fish assessment)
- Terrestrial Biodiversity Assessment (Fauna, Flora, Avifauna)
- Soil, Agricultural Potential, Land Use Capability;
- Hydrogeology Assessment
- Noise, Air Quality, Visual Impact Assessments / Statements
- Socio-Economic Impact Assessment
- Community Health Study

## 9. Public Participation Plan

Public participation is a key requirement of the EIA process and needs to be conducted in line with the NEMA EIA Regulations (Regulation 39-44). The PPP aims to engage I&APs and provide an opportunity for the expression of public views on the environmental impacts of the application. All public issues and views on impacts are documented, addressed and responded to in the EIA process and incorporated into environmental reports for consideration by the DMRE. It is therefore important that relevant I&APs are identified and involved in the PPP from the beginning of the process to help focus the EIA process plan.

Naledzi's public participation plan for the project includes three rounds of consultation to satisfy both the NEMA and NWA requirements.

Three rounds of public consultation are planned as part of the EIA process to satisfy both the NEMA and NWA requirements. (See EIA process Schedule provided under Section 7)

### Plan

#### 1st Round - I&AP Registration, Circulation of BID for 30-days review and comment

**November 2022** - The project will be announced to the public through the following means:

- 4 – 11 November 2022:
  - A newspaper advertisement in the Plattelander and Gemsbok newspaper
  - Placement of onsite notices in the project area;
- 4 November to 5 December 2022:
  - Availability of a BID (this document) at public venues in the project area and on the Naledzi website ([www.naledzi.co.za/publicdocuments](http://www.naledzi.co.za/publicdocuments)) under the heading 'Proposed Grasdrift Mine'.
  - Distribution of the BID and Notification Letter to I&APs for comment and review (30 days)

- 16 – 17 November 2022:
  - Conduct public meetings in the project area from 16 – 17 November 2022 (See below details)

## **2nd Round – Released of Draft Scoping Report for 30-day review and comment**

### **January to February 2023**

The second round of consultation will be conducted and entail the following:

- A newspaper advertisement in the same local and regional newspaper (issued on Friday and Wednesday)
- Emailing of notification letters to registered I&APs of the availability of the draft SR
- Availability of Draft Scoping Report for public review and comment during January 2023 at the same public venues as the BID and Naledzi website;
- Once the public review period lapses, the report will be updated to incorporate public inputs and submitted to the DMRE at the beginning of February 2023 for approval.
- I&APs will be notified once the SR is approved and the Impact Phase may commence which is expected in April 2023.

## **3rd Round - Released of Draft EIR & EMPR for 30-days review and comment**

### **June – July 2023**

The third round of consultation will entail the following:

- Another round of newspaper advertisements
- Emailing of notification letters to registered I&APs of the availability of the draft EIR & EMPR
- Availability of Draft EIR & EMPR for public review and comment at the same public venues as the BID and Scoping Report and on the Naledzi website.
- The second round of public meetings will be held, wherein the findings of the EIR & EMPR will be presented.

## **9.1 Scheduled Public Meetings**

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I&APs are invited to attend the below scheduled public meetings for the project where the EAP will give an overview of the project and EIA process being followed. Registration and Comment Sheets will also be available and can be completed at the meeting venues.

**Table 2: Scheduled Public Meetings**

<b>Date</b>	<b>Venue</b>	<b>Time</b>
16 November 2022	LEKKERSING HALL	10H00
16 November 2022	EKSTEENFONTEIN HALL	14H00
17 November 2022	KUBOES V GK CHURCH HALL	10H00
17 November 2022	SANDDRIFT HALL	14H00

Registration and Comments forms will also be available at the meeting venue and can be completed and submitted to Naledzi after the meeting. Targeted meetings will also be held with key commenting authorities and stakeholders as required during the course of the EIA process.



## 10. How can you become involved?

You are invited to register as an Interested and Affected Party (I&AP) for **30 days, from 4 November to 5 December 2022**. The BID is presently available for review and submission of comments regarding the proposed application.

You can attend the scheduled public meetings on 16 and 17 November 2022 to ask questions of clarity and to obtain more project information.

I&APs are requested to please provide their comments together with their name, contact details and an indication of any direct business, financial, personal or other interest that they have in the application, to the **contact person provided below**, within the specified period.



Naledzi Environmental Consultants (Pty) Ltd

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Contact Person: Marissa Botha / Desmond Musetsho

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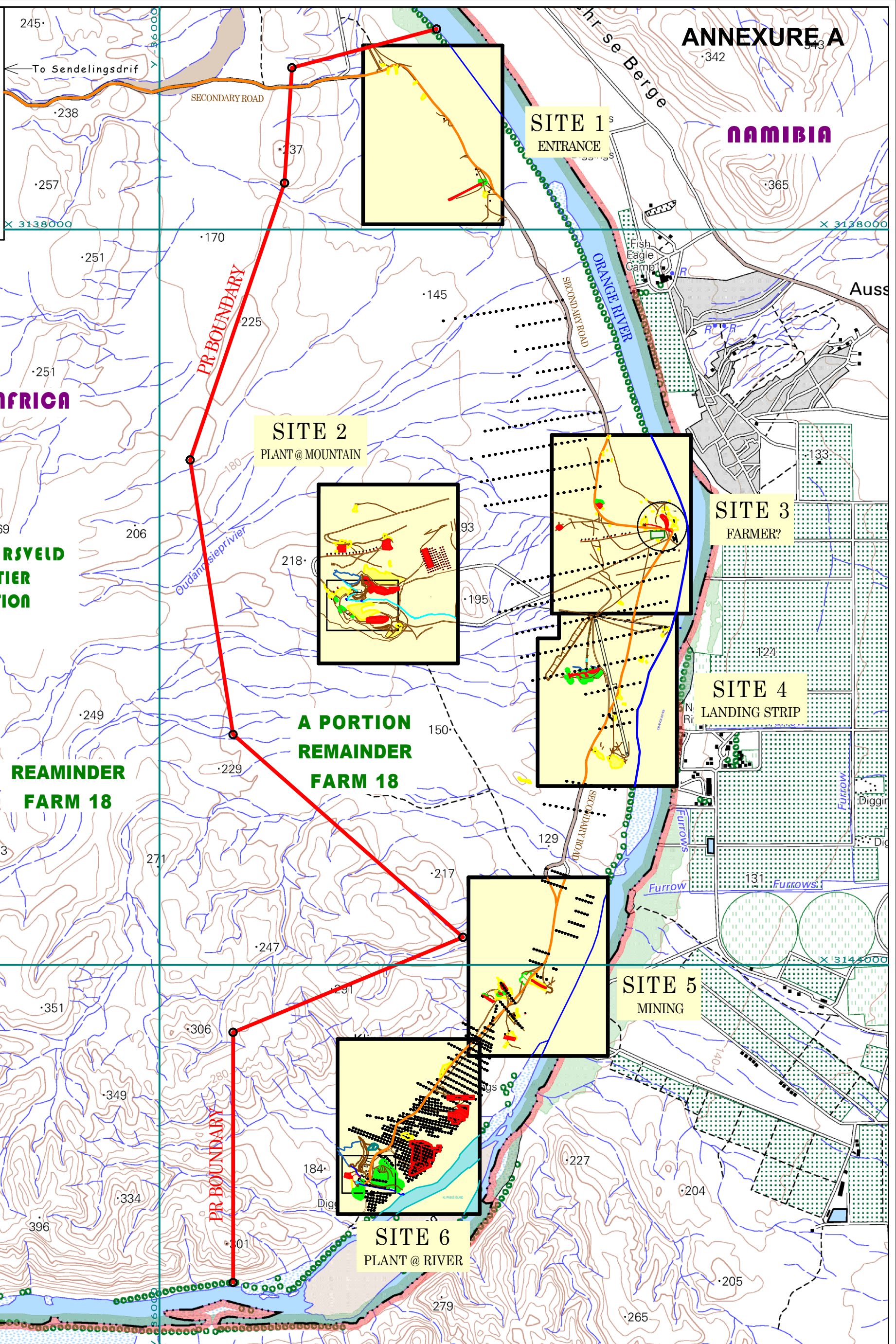
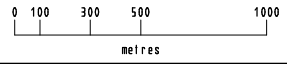


# KEY PLAN

# ANNEXURE A



500m = 20mm



## GRASDRIFT MINING

### KEY PLAN

WGS84 DATUM SURVEY SYSTEM LO17

SCALE 1 : 30 000

#### LEGEND:

PROSPECTING BORE HOLES	• • •	MINE ROAD	=====
PROSPECTING PIT & DUMP	● ● ●	SECONDARY ROAD	=====
MINED	■ ■ ■	WATER	=====
DISTURBED	■ ■ ■		
RAMP			
DUMPS	■ ■ ■		