EXECUTIVE SUMMARY

1 INTRODUCTION

On 22 November 2022, the Department of Mineral Resources and Energy (DMRE) accepted an application lodged by De Beers Consolidated Mines (Pty) Ltd (DBCM) for a prospecting right to undertake offshore diamond prospecting activities in South African Sea Areas 4C and 5C, off the West Coast of South Africa (see Figure 1). The application was lodged in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002; MPRDA) (as amended).

In terms of the Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), promulgated in terms of the National Environmental Management Act (No. 107 of 1998; NEMA), an application for a prospecting right requires Environmental Authorisation (EA) from the competent authority, the Minister of Mineral Resources and Energy (or delegated authority), to carry out the proposed prospecting activities. An application for EA, in terms of NEMA, was submitted to the DMRE at the same time as the prospecting right application. In order for DMRE to consider an application for EA, a Basic Assessment (BA) process must be undertaken.

SLR Consulting (South Africa) (Pty) Ltd (SLR) has been appointed by De Beers Marine (Pty) Ltd (DBM) on behalf of DBCM, as the independent Environmental Assessment Practitioner (EAP) to meet the relevant requirements of NEMA and the EIA Regulations, 2014 (as amended) and undertake an application for EA.

The draft BAR and Environmental Management Programme (EMP) was made available for a 30-day public review and comment period from 4 June to 5 July 2021. Subsequently the application for EA was suspended pending an internal appeal process regarding the application for a prospecting right itself under the MPRDA. As noted above, the Prospecting Right Application has since been accepted by the DMRE and the original Application for EA was acknowledged on 29 November 2022.

As the project proposal remains unchanged, the previous distribution of the draft BAR for public review and comment is regarded as a pre-application process for the Application for EA. The written submissions received during the previous draft BAR review and comment period have been collated, and responded to, in a Comments and Responses Report, which is appended to this report (refer to Appendix C4). It should be noted that all significant changes to the draft BAR are underlined and in a different font (Times New Roman) to the rest of the text.

This report presents the process followed and the findings of the BA process to date.

2 OPPORTUNITY FOR COMMENT

This updated draft Basic Assessment Report (BAR) has been distributed for a 30-day comment period from **4 February to 6 March 2023** in order to provide Interested and Affected Parties (I&APs) with an opportunity to comment on any aspect of the BA process and the proposed project. Copies of the report were made available on the SLR website (https://www.slrconsulting.com/en/public-documents/debeers-4c5c) and on a zero-data rated website (https://slrpublicdocs.datafree.co/en/public-documents/debeers-4c5c).

Any comments should be forwarded to SLR at the address, telephone or email address shown below.[1] For comments to be included in the updated BAR, comments should reach SLR **by no later than 6 March 2023.**

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After the conclusion of the comment period, all comments received will be collated into a Comments and Responses Report. The comments will be duly taken into account in compiling the updated BAR, which will be submitted to the DMRE for consideration and decision-making.

After DMRE has reached a decision, all registered I&APs will be notified of the outcome of the application and the reasons for the decision. A statutory appeal period in terms of the National Appeal Regulations, 2014 will follow the issuing of the decision.

3 BASIC ASSESSMENT PROCESS

3.1 Application for EA and Prospecting Right

DBCM lodged an application for a prospecting right, in terms of the MPRDA, with the DMRE on 9 February 2021. An application for EA, in terms of NEMA, was submitted to the DMRE at the same time. Following an internal appeal process, the Prospecting Right Application was accepted by the DMRE on 22 November 2022. The Application for EA was then accepted on 29 November 2022.

3.2 Specialist Studies

Two specialist studies were commissioned to address potential key issues and impacts that may arise as a result of the proposed project. These specialist studies were: 1) Marine Fauna and 2) Fisheries. An Underwater Heritage specialist was previously commissioned by DBM to investigate the Sea Areas and this information has been included in this report. The specialist studies involved the gathering of data relevant to identifying and assessing environmental impacts. The impacts were assessed according to pre-defined scaled and appropriate mitigation and / or enhancement measures to minimise potential impacts or enhance potential benefits, respectively, were provided.

[1] It is assumed that in providing your Personal Information to be registered as an I&AP for this Project you authorise SLR to retain and use your Personal Information as part of a contact database for this and/or other Social and Environmental Impact Assessment Project(s) and that you confirm your acceptance for SLR to contact you regarding this and/or other Social and Environmental Impact Assessment processes. SLR warrants that we will not process your Personal Information, other than as permitted or required by Social and Environmental Impact Assessment processes or as required by Law or public policy. SLR will use reasonable, appropriate security safeguards in order to protect Personal Information, and to reasonably prevent any damage to, loss of, or unauthorised access or disclosure of Personal Information, other than as required for Social and Environmental Impact Assessment processes or as required by any Law or public policy. You may request for your Personal Information to be deleted from the I&AP database at any time by contacting SLR by e-mail or in writing at the address provided above.

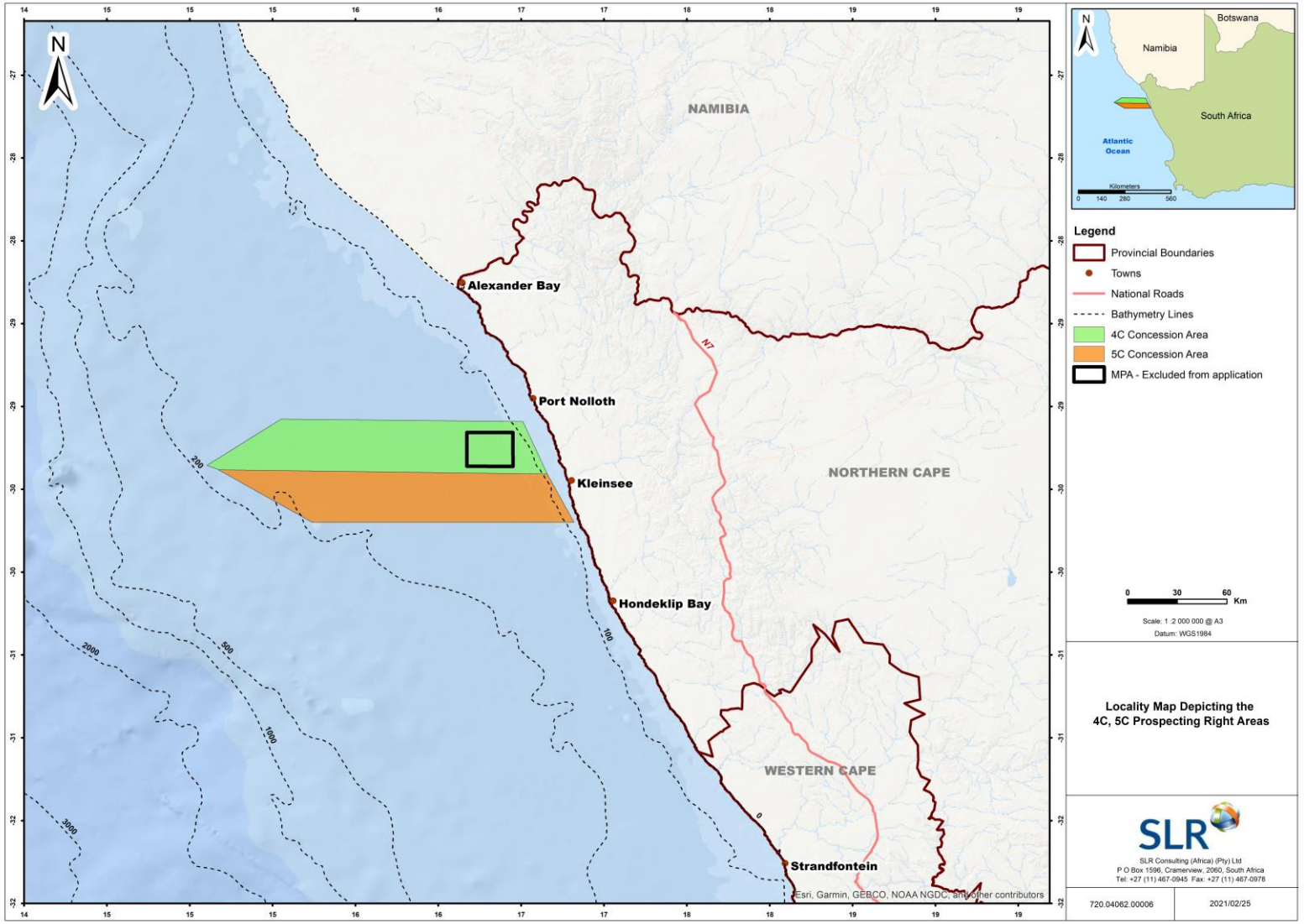

Figure 1: Location of the 4C and 5C Prospecting Right Area, off the West Coast of South Africa, showing exclusion of the Namaqua Fossil Forest Marine Protected Area.

3.3 Compilation of draft BAR for Review

This draft BAR is compiled in compliance with Appendix 1 of the EIA Regulations, 2014 (as amended). The specialist findings and other relevant information were integrated into this draft BAR, which includes an Environmental Management Programme (EMPr).

This report aims to present all information in a clear and understandable format suitable for easy interpretation by I&APs and authorities and provides an opportunity for I&APs to comments on all aspects of the proposed project, as well as findings of the impact assessment.

3.4 Public Participation

The tasks undertaken as part of the previous public participation process entailed the following steps:

- A preliminary I&AP database was compiled consisting of authorities (including state departments with jurisdiction in the area, municipal offices and ward councillors), Non-Governmental Organisations, Community-Based Organisations and other key stakeholders with a potential interest in the proposed project.
- Copies of the full BAR and Executive Summary were placed on the SLR website (www.slrconsulting.com/debeers-4c5c), as well as on a zero-data rated website that I&APs could use to access the draft BAR (via internet-capable devices) at no charge (https://www.slrpublicdocs.datafree.co/public-documents/debeers-4c5c).
- Advertisements were placed in local newspapers in English and Afrikaans.
- Posters have been placed at public locations within Port Nolloth.
- A notification letter was sent to all registered I&APs on the project database via email and post (where email addresses were not provided) to inform them of the public participation process (PPP). The letter also announced the availability of the draft BAR for 30-day comment period and invited I&APs to submit comments on any aspect of the BA process and the proposed project. The notification letter provided a link to the SLR websites that I&APs could use to access and download the Executive Summary and draft BAR.

The additional public participation tasks undertaken will be presented in the final Basic Assessment Report.

4 PROJECT DESCRIPTION

4.1 General Information

Information for the project description was provided by De Beers. The proposed prospecting activities would be undertaken within Sea Areas 4C and 5C, located off the West Coast of South Africa. The Sea Areas are situated approximately 470 km north of Cape Town; with the inshore boundary located between 2.5 and 5 km seaward of the coast. Operations will however typically be focussed in areas where the water depth ranges from 70 m – 160 m. Port Nolloth is located 10 km north of Sea Area 4C and Hondeklip Bay is located 50 km south of Sea Area 5C. The offshore boundary is located between approximately 140 to 180 km offshore (refer to Figure 1). **Given the location of the Sea Areas and nature of the proposed activities, no effect on coastal activities are anticipated as a result of the prospecting operations.**

The Prospecting Right area is 926 468.017 ha in extent and excludes the Namaqua Fossil Forest Marine Protected Area in Sea Areas 4C.

4.2 Need and Desirability

In the recently published DMRE Strategic Plan 2014-2019, the foreword by the Minister of Mineral Resources notes that the Department "*will continue to promote mineral value addition to strengthen the interface between extractive industries and national socio-economic developmental objectives*".

This project aims to identify economically viable diamond deposits on the continental shelf off the coast of the Northern Cape with the intention of deriving value from the identified offshore mineral resources and contributing to the existing diamond mining sector in the Northern Cape.

4.3 Project Overview

The prospecting activities would be conducted in a phased approach, with each phase dependant on results of the previous phase. Two phases planned are as follows and it is proposed that they would run over a five-year period.

Phase 1 entails exploration sampling (e.g. coring and / or wide spaced sampling) in target features of interest, enabling refinement of the definition of the target features. Geophysical survey may also be undertaken. Should the result of the survey(s) / exploration sampling indicate potential exists, then further follow-up sampling and infill survey may be undertaken to establish the distribution of the diamondiferous material.

Should geological features of interest be identified, then a decision will be made regarding the feasibility of proceeding to Phase II of the prospecting activities. Phase II consists of a techno-economic assessment study that will be undertaken, utilising available sampling and geophysical data to assess the economic viability of mining the deposits in Sea Areas 4C and 5C. Phase II is a desktop study and therefore not discussed any further in this report.

4.3.1 Geophysical Surveys

The geophysical survey equipment will be deployed from a fit-for-purpose vessel that is suited to the water depth and selected survey method. The 2D geophysical systems could be deployed from various platforms (see Figure 3-1), such as towed systems, vessel mounted, pole mounted, Autonomous Underwater Vehicles (AUV) or Autonomous Surface Vehicle (ASV). The AUV (see Figure 3-2) is used for survey in areas where survey line spacing is generally <100 m apart. The towed 2D surveys will involve a single towed streamer (hydrophone array). 3D surveys for DBM are acquired using the AUV, with all the sensors on the platform. This contrasts with 3D survey used for petroleum exploration, which uses multiple towed streamers.

The following tools are available for proposed regional geophysical surveys:

- Multibeam Swath bathymetry (including backscatter);
- Sub-bottom profiler systems;
- Side scan sonar systems;
- Electrical, Magnetic and Electro-Magnetic systems.

4.3.2 Sampling

Exploration sampling would be undertaken using a fit-for-purpose tool and vessel of opportunity in water depths ranging from 70 m to 160 m. The planned sampling methodology will take advantage of the latest technologies available to DBM.

Depending on the outcomes of previous stage work, samples may be collected in a fixed pattern over an identified target area. Samples may be taken along lines spaced 10 m to 500 m apart, with samples spacing based on the geological nature of the target area. Possible sampling tool technologies that could be employed include coring, the use of a subsea sampling tool and a vertically mounted sampling tool.

For the purposes of this assessment it is assumed that up to 22 500 samples would be obtained within the potential deposit area(s) during the 5 years of prospecting. The sample spacing for the initial wide spaced exploration sampling / coring, will be dependent on the geological feature size. The follow-up sample spacing is expected to typically vary between 50 and 200 m apart. The maximum potential cumulative area of disturbance would be approximately 0.225 km^2 (which is an insignificant percentage (0.002%) of the overall prospecting right area) but would not be contiguous.

4.4 Consideration of Alternatives

4.4.1 Location Alternatives

The intention of the proposed prospecting operations is to determine the presence of economically viable diamond deposits that occur within Sea Areas 4C and 5C. It follows that no location alternatives are considered in the BA process.

4.4.2 The No-Go alternatives

The No-Go alternative is the non-occurrence of the proposed project. The negative implications of not going ahead with the proposed project are as follows:

- Loss of opportunity to establish whether further viable offshore diamond resources exist;
- Prevention of any socio-economic benefits associated with the continuation of prospecting activities; and
- Lost economic opportunities.

The positive implications of the no-go option are that there would be no effects on the biophysical environment in the area proposed for the prospecting activities.

5 AFFECTED ENVIRONMENT

5.1 Physical Environment

Sea Areas 4C and 5C lie within the southern zone of the Benguela Current region and is characterised by the cool Benguela upwelling system. The dominant southerly and south-easterly winds in summer drive the massive offshore movement of surface water, resulting in strong upwelling of nutrient-rich bottom waters. Nutrient-rich upwelled water enhances primary production, and the West Coast region consequently supports substantial pelagic fisheries.

5.2 Biological Oceanography

Sea Areas 4C and 5C fall into one of the nine bioregions, namely the cold temperate Namaqua Bioregion. Communities within marine habitats are largely ubiquitous throughout the southern African West Coast region, being particular only to substrate type or depth zone. These biological communities consist of many hundreds of species, often displaying considerable temporal and spatial variability (even at small scales).

The fish species likely to be present in this area comprise primarily the large pelagic species (e.g. tunas, snoek, billfish and pelagic sharks), which migrate throughout the southern oceans, between surface and deep waters (>300 m).

Most seabirds in the region reach highest densities offshore of the shelf break (200 to 500 m depth), however some species may be encountered in the Sea Areas. Marine mammals likely to be present include seals, Heaviside's dolphins, dusky dolphins, migrating humpback whales and southern right whales.

5.3 Human Utilisation

The Sea Areas have limited overlap, or are situated adjacent to, fishing grounds associated with the demersal long-line, traditional line-fish and pole-and-line commercial fisheries. Demersal fisheries overlap only in the extreme offshore portions of Sea Areas 4C and 5C beyond the depth of current interest for prospecting activities. Traditional line-fishing effort has not been reported within the Sea Areas. Pole-and-line commercial fisheries take place inshore of the 100 m with low fishing effort reported within Sea Areas 4C and 5C. Small-scale fishery rights are located in the nearshore. Grounds fished by the nearshore rock lobster sector are situated inshore of the Sea Areas. Small-scale line-fish activities may potentially extend into the shallow water areas of Sea areas 4C and 5C, however are unlikely to extend beyond 3 nm. Sea Areas 4C and 5C do not overlap with any of the other fishing sectors.

The majority of shipping traffic is located on the outer edge of the continental shelf with traffic inshore of the continental shelf along the South-West Coast largely comprising fishing vessels, especially between Kleinsee and Oranjemund. The majority of the shipping traffic would be limited to the western portions of the Sea Areas. Exploration for oil and gas is currently undertaken in a number of licence blocks off the West Coast. There is no current development or production from the South African West Coast offshore. A number of proposed prospecting areas for glauconite and phosphorite / phosphate are located off the South-West Coast, all of which are located south of Sea Areas 4C and 5C. A number of marine diamond prospecting and mining sea areas are also located in proximity to Sea Areas 4C and 5C.

Sea Areas 4C and 5C overlap with the Namaqua Fossil Forest MPA, however, the MPA has been excluded from the prospecting right application and no geophysical surveying and sampling activities will occur there. The Namaqua Fossil Forest EBSA (a portion of which comprises the Namaqua Fossil Forest MPA) lies within Sea Areas 4C and 5C.

5. ENVIRONMENTAL IMPACT ASSESSMENT

Table 1 provides a summary of the significance ratings assigned to each potential impact of the proposed prospecting activities.

Table 1: Summary of the significance of the potential impacts associated with the proposed prospecting activities and No-Go Alternative.

Potential impact		Significance	
		Without mitigation	With mitigation
Impact of the Vessel Discharges / Disposal to Sea			
Deck Drainage		VL	**VL**
Machinery Space Drainage		VL	**VL**
Sewage		VL	**VL**
Galley Waste		VL	**VL**
Solid Waste		INSIG	**INSIG**
Impact on Marine Fauna:			
Acoustic Impacts:			
Geophysical Surveys		VL	**VL**
Sampling Operations		VL	**N/A**
Electromagnetic Impacts of Geophysical Surveys		INSIG	**INSIG**
Disturbance and Loss of Benthic Fauna		VL to L	**VL**
Crushing of Benthic Fauna During Sampling Operations		VL	**VL**
Generation of Sediment Plumes		VL	**N/A**
Smothering of Benthos in Redepositing Sediments:			
Redeposition of discarded sediments on soft-sediment macrofauna		VL	**N/A**
Redeposition of discarded sediments on rocky outcrop communities		L	**VL**
Vessel lighting on pelagic fauna		VL	**VL**
Collisions with Project Vessels and Equipment		VL	**VL**
Potential loss of Equipment		VL	**VL**
Noise from Helicopters		VL	**VL**
Impact on Other Users of the Sea:			
Fishing industry	Exclusion of the traditional line-fish, pole-and-line, small-scale fishers	INSIG	**INSIG**
	Exclusion of the fisheries research	VL	**NO IMPACT**
	Potential Impact of Survey Noise on Catch Rates	VL	**N/A**
	Sediment plume impact on fish stock recruitment	VL - INSIG	**N/A**
Marine mining and prospecting		INSIG	**INSIG**
Petroleum exploration		VL-L	**VL**
Marine transport routes		INSIG	**INSIG**

Potential impact	Significance	
	Without mitigation	With mitigation
Socio-Economic Impact		
Impact on Cultural Heritage Material	M	**INSIG**
Impact related to job creation and business opportunities	*VL+*	***VL+***
No-Go Alternative:		
Lost opportunity to establish whether or not a viable offshore diamond resources exists off the West Coast and the lost economic opportunities.	L	**N/A**
Cumulative Impact:		
Benthic environment	**INSIG**	
Acoustic Impacts	**L**	
Fishing activity	**VL**	
Impact related to job creation and business opportunities	***VL+ - L+***	

VH=Very High H=High M=Medium L=Low VL=Very low Insig = insignificant N/A= Not applicable

6. CONCLUSIONS

The majority of the impacts associated with the vessel operations would be of short-term duration and limited to the immediate sampling areas. As a result, the majority of the impacts associated with the survey or sampling vessels are considered to be of **INSIGNIFICANT** to **VERY LOW** significance after mitigation.

Potential impacts on marine fauna as a result of the proposed prospecting activities would be of medium- to short-term duration and limited to the immediate survey/sampling areas. As a result, the impacts on marine fauna associated with the prospecting activities are generally considered to be of **INSIGNIFICANT** to **VERY LOW** significance after mitigation.

The proposed prospecting operations would potentially impact upon the demersal longline, pole-and-line, traditional linefish and small-scale fishery sectors, as well as fishery research surveys through the implementation of the required safety exclusion zones around the survey/sampling vessel. The probability of this impact is however improbable and would be of short-term duration and limited to the small portions of the overall 4C and 5C Sea Areas. As a result, the activities are expected to be **INSIGNIFICANT**. By liaising with the DFFE to ensure that the proposed prospecting activities avoid the planned research surveys there would be **NO IMPACT**. There is no impact expected on the remaining commercial fisheries sectors.

The likelihood of disturbing a shipwreck is expected to be very low considering the vast size of the South African offshore area. In the event that any cultural heritage material is disturbed during sampling operations, the impact would be at the national level, and of high intensity. Without mitigation this is of **Medium** significance. However, with the implementation of mitigation, cultural heritage sites can largely be avoided and if sampling is temporarily terminated in the unlikely event of encountering a shipwreck, archaeological investigations can be held and the impact regarded as **INSIGNIFICANT**.

The implications of not going ahead with the proposed prospecting operations relate to the lost opportunity to establish whether or not a viable offshore diamond resource exists off the West Coast and the lost economic opportunities. This potential impact of the No-Go Alternative is considered to be of **LOW** significance. The positive implications on the no-go option are that there would be no effects on the biophysical environment in the area proposed for the prospecting activities.

7. RECOMMENDATIONS

7.1 Compliance with Environmental Management Programme and MARPOL 73/78 standards

- All phases of the proposed project must comply with the Environmental Management Programme attached as Appendix E; and
- The sampling and support vessels must ensure compliance with MARPOL 73/78 standards.

7.2 Notification and communication with key stakeholders

- Prior to the commencement of the proposed activities, DBCM or the appointed operator should consult with the managers of the Department of Forestry, Fisheries and the Environment (DFFE) research survey programmes to discuss their respective programmes and the possibility of altering the prospecting programme in order to minimise or avoid disruptions to both parties, where required;
- Prior to the commencement of activities, notify overlapping and neighbouring petroleum rights holders, as well as any neighbouring mineral prospecting or mining rights holders, to ensure that there is no overlapping of activities in the same area over the same time period;
- Notify relevant government departments and other key stakeholders of the commencement of sampling operations (including navigational co-ordinates, timing and duration of proposed activities) and the restrictions related to the operation. Stakeholders include:
  - Fishing industry / associations:
    - South African Tuna Association;
    - South African Tuna Longline Association;
    - South African Deepsea Trawling Industry Association (SADSTIA);
    - South African Linefish Associations;
    - SA Marine Linefish Management Association (SAMLMA);
    - Hake Longline Association;
    - National Small, Medium and Micro-Enterprise (SMME) Fishing Forum; and
    - West Coast Rock Lobster Sea Management Association (if any activities are activated in shallower water depths than the 100 m contour line).
  - Representatives of small-scale local fishing co-operatives;
  - South African Maritime Safety Authority (SAMSA);
  - DFFE, including the fisheries research managers and the Vessel Monitoring, Control and Surveillance (VMS) Unit;
  - Transnet National Ports Authority (ports of Cape Town or Saldanha Bay, as may be applicable); and

- Prior to commencement of activities notify the SAN Hydrographic Office, requesting a Notice to Mariners be issued with the co-ordinates of the geophysical or sampling areas with the required safety zones around the survey or sampling vessel for the duration of the operations.
- Notify the SAN Hydrographic office when the programme is complete so that the Navigational Warning can be cancelled.

7.3 Discharges

- Ensure that hydrocarbons are stored in such a way as to prevent release of pollutants overboard;
- Ensure all crew are trained in spill management;
- Low-toxicity biodegradable detergents and suitable absorbents (where possible reusable absorbent cloths), should be used in cleaning of all deck spillage; and
- Minimise the discharge of galley waste material should obvious attraction of marine fauna be observed.

7.4 Vessel seaworthiness and safety

- Vessels used during prospecting must be certified for seaworthiness through an appropriate internationally recognised marine certification programme (e.g. Lloyds Register, Det Norske Veritas).
- Collision prevention equipment should include radar, multi-frequency radio, foghorns, etc. Safety equipment and training of personnel to ensure the safety and survival of the crew in the event of an accident is a further legal requirement.

7.5 Vessel Transit

- Vessel operators should keep a watch for marine mammals and turtles in the path of the vessel.
- Ensure vessel transit speed of 10 knots (18 km/hr) when sensitive marine fauna are present in the vicinity.

7.6 Geophysical Surveys

- A MMO should be appointed to ensure compliance with mitigation measures during geophysical surveying.
- Onboard MMOs should conduct visual scans for the presence of cetaceans around the survey vessel prior to the initiation of any acoustic impulses.
- Pre-survey scans should be limited to 15 minutes prior to the start of survey equipment.
- “Soft starts” should be carried out for any equipment of source levels greater than 210 dB re 1 µPa at 1 m over a period of 20 minutes to give adequate time for marine mammals to leave the vicinity. Equipment of source levels greater than 210 dB re 1 µPa at 1 m not capable of “soft starts” would be run concurrently with equipment that can be soft started and only switched on once the soft-start has been completed.
- Terminate the survey if any marine mammals show affected behaviour within 500 m of the survey vessel or equipment until the mammal has vacated the area.
- Where possible, avoid planning geophysical surveys during the movement of migratory cetaceans (particularly baleen whales) from their southern feeding grounds into low latitude waters (beginning of June to end of November), and ensure that migration paths are not blocked by sonar operations. As no seasonal patterns of abundance are known for odontocetes occupying the proposed exploration area, a precautionary approach to avoiding impacts throughout the year is recommended.

- Ensure that passive acoustic monitoring (PAM) is incorporated into any surveying taking place between June and November.
- Use standard operational procedure to warm up the electromagnetic source transmitter (i.e. equivalent to ramp-up of current in electric source). It is recommended that the electromagnetic source should be ramped up over a minimum period of 20 minutes.
- Turn off electromagnetic source when not collecting data.
- Use lowest field strengths required to successfully complete the electrical, magnetic and/or electro-magnetic survey.
- A non-dedicated marine mammal observer (MMO) must keep watch for marine mammals behind the vessel when tension is lost on the towed equipment. Either retrieve or regain tension on towed gear as rapidly as possible.
- Should a cetacean become entangled in towed gear, contact the South African Whale Disentanglement Network (SAWDN) formed under the auspices of DFFE to provide specialist assistance in releasing entangled animals.

7.7 Sampling Activities

- Remote sensing data should be used to conduct a pre-sampling analysis of the seabed to identify high-profile, rocky-outcrop areas without a sediment veneer. Exploration sampling targets gravel bodies in unconsolidated sediments and does not target these high-profile rocky-outcrops without a sediment veneer.

7.8 Cultural Heritage Material

- Areas where shipwreck sites are identified during the geophysical surveys must be excluded prior to undertaking sampling activities;
- The onboard DBCM/DBM representative must undergo a short induction on archaeological site and artefact recognition, as well as the procedure to follow should archaeological material be encountered during sampling;
- The vessel operator must be notified that archaeological sites could be exposed during sampling activities, as well as the procedure to follow should archaeological material be encountered during sampling; and
- If shipwreck material is encountered during the course of sampling in the prospecting area, the following mitigation measure should be applied:
  - > Cease work in the directly affected area to avoid damage to the wreck until SAHRA has been notified and DBM has complied with any additional mitigation as specified by SAHRA; and
- Where possible, take photographs of artefacts found, noting the date, time, location and types. Under no circumstances may any artefacts be removed, destroyed or interfered with on the site, unless under permit from SAHRA.

8. ENVIRONMENTAL MANAGEMENT PROGRAMME

The EMPr has been compiled for the proposed prospecting activities, which consolidates management activities required to address the issues and mitigation measures identified in this BAR. The EMPr is attached as Appendix F to the main report.