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De Beers Group of Companies
Namaqualand Mines
Private Bag X01
Kleinzee, 8282

c/o Werner Nel Environmental Consulting Services

ATTENTION: WERNER NEL

**DE BEERS: PROPOSED ESTABLISHMENT OF AN ASBESTOS WASTE DISPOSAL SITE,
KLEINZEE – SPECIALIST ECOLOGY IMPACT STATEMENT**

De Beers Namaqualand Mines' Buffels Marine Mining Complex between Kleinzee and Port Nolloth in the Northern Cape is currently in the process of being decommissioned. As part of the decommissioning, various old buildings and infrastructure are to be demolished. A number of these buildings were constructed with asbestos sheeting which would now need to be responsibly disposed of. In this regard, De Beers is proposing to establish an asbestos waste disposal site in one of three mined out areas identified within the Buffels Marine Complex.

In line with the requirements of the competent authority for issuing of a Waste Licence for the proposed site, SLR Consulting (South Africa) (Pty) Ltd (SLR) has been appointed by De Beers Namaqualand Mines to provide a specialist ecological comment on the suitability of the selected sites. For this submission, SLR partnered with Dr Dave MacDonald (Pr.Sci.Nat.) to provide specialist botanical input, while SLR would provide the specialist comment relating to terrestrial fauna.

In compiling this specialist comment, the three sites were not inspected, but the comment rather based on recent photographs of the sites provided by De Beers and experience of similar mined areas in the Alexander Bay diamond fields (see enclosed photographs).

The sites are pits that are similar, having much the same appearance and condition. They have been mined down to bedrock and have relatively steep sides. Wind-blown sand has accumulated on the floor of the mined trenches and sparse vegetation has established. This vegetation is, however, so sparse that it apparently does not prevent or even limit the movement of sand.



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The high level of disturbance caused by the historical mining has resulted in a completely transformed condition. The original vegetation (likely Richtersveld Coastal Duneveld) that would have occurred on the soil surface prior to mining has been completely removed and the sparse vegetation that has returned obviously has extremely low sensitivity. There is also no doubt that ecological processes are severely compromised to the point of being virtually non-existent.

With regards to terrestrial fauna, no substantial natural rock outcrops that could provide shelter for rock-dwelling small mammals or reptiles occur in the mined out areas. Due to the completely transformed condition of the sites, no unique faunal habitats are available and the sites are thus unlikely to offer suitable or essential habitat conditions for any faunal species of conservation concern. It is thus also not expected that any species of conservation concern would be encountered within the preferred waste disposal site footprint (Site 1) or two alternative sites. The speckled padloper (*Homopus signatus*, rated as *Vulnerable*) has, however, been recorded in the general area along the coast between Kleinzee and Port Nolloth. It is thus recommended that should any tortoises be encountered during site preparation for the proposed site, they be removed to a suitable rocky area outside of the development footprint.

Having considered the unlikely possibility of species of conservation concern being encountered within any of the three identified sites, the complete transformed nature of the sites and related severely compromised ecological processes, it is concluded that, from an ecological perspective, the preferred Site 1 and the two alternative sites are all deemed suitable for development as an asbestos waste site. It is not believed that this activity would have any negative repercussions on the general receiving environment and no plant communities, important faunal habitat features or essential ecological processes would be lost due to the proposed project.

We trust the above specialist comment would suffice. Please feel free to contact the undersigned should you have any queries in this regard.

Kind Regards



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Site 1 (preferred)



Site 2



Site 3