



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

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From: Directorate: Mineral Regulation: Northern Cape **Date:** 22 February 2013
Enquiries: Mr. N.V. Muila **E-mail:** vincent.muila@dmr.gov.za
Ref No: NCS 30/5/1/1/3/2/1/10691EM

The Director
South African Heritage Resources Agency
PO Box 4637
CAPE TOWN
8000

Attention: Mrs Nonofho Ndobochani

CONSULTATION IN TERMS OF SECTION 40 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT 2002, (ACT 28 OF 2002) FOR THE APPROVAL OF AN ENVIRONMENTAL MANAGEMENT PLAN ON PORTIONS 1 AND 2 OF THE FARM ABBASAS NO. 26 AND PORTION OF THE FARM KABIS NO. 27, SITUATED IN THE MAGISTERIAL DISTRICT OF NAMAQUALAND: NORTHERN CAPE REGION.

APPLICANT: PSALM 109 TRADING CC

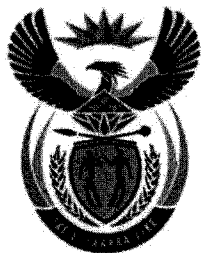
Attached herewith, please find a copy of an EMP received from the above-mentioned applicant, for your comments.

It would be appreciated if you could forward any comments or requirements your Department may have to this office and to the applicant **23 April 2013** as required by the Act.

Consultation in this regard has also been initiated with other relevant State Departments. In an attempt to expedite the consultation process please contact **Vincent Muila** of this office to make arrangements for a site inspection or for any other enquiries with regard to this application.

Your co-operation will be appreciated.

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**ACTING REGIONAL MANAGER: MINERAL REGULATION
NORTHERN CAPE REGION**



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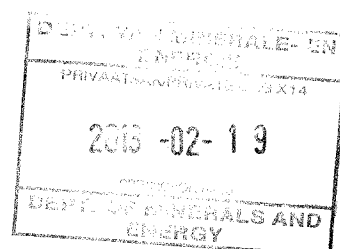
Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

NAME OF APPLICANT: Psalm 109 Trading CC

REFERENCE NUMBER: NC 30/5/1/1/2/10691 PR

ENVIRONMENTAL MANAGEMENT PLAN

**SUBMITTED
IN TERMS OF SECTION 39 AND OF REGULATION
52 OF THE MINERAL AND PETROLEUM
RESOURCES DEVELOPMENT ACT, 2002,
(ACT NO. 28 OF 2002) (the Act)**



1 REGULATION 52 (2): Description of the environment likely to be affected by the proposed prospecting or mining operation

1.1 The environment on site relative to the environment in the surrounding area.

Status of the cultural environment that may be affected

The Namaqualand copper and diamond mines and their associated infrastructure and cultural landscape reflect the beginnings of the mining industry in South Africa in all the myriad ways in which that industry influenced and continues to influence society through the movement and housing of people, the development of transport and other infrastructure and industries and in the development of technological and scientific endeavour.

It also reflects the very close links between the development of the Southern African mining industry and mining technology pioneered in Britain, particularly in the counties of Cornwall and Devon, and the landscapes and social structures that went with them.

In its socio-cultural aspects, the Namaqualand copper mines saw the development of the first company towns of the industrial era in South Africa and the movement of people from various parts of the Cape Colony to Namaqualand to provide labour and to serve the trade that developed here.

Any form of mining or prospecting will therefore be a continuation of the socio-cultural aspects of the area.

Status of any heritage environment that may be affected

No heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves of victims of conflict, and cultural landscapes or viewsapes are present on the prospecting area applied for. The area is already disturbed by historic mining activities and any sites of cultural significance will already be disturbed or destroyed.

Status of any current land uses and the socio-economic environment that may be directly affected

Approximately 90% of the region is used for livestock grazing and production, with the remainder comprising of mining and urban development. Urban development is not a major feature of the landscape, and is not expected to increase much in the coming years.

Prospecting will only be a temporary land use where after land use will revert back to the pre-mining land use grazing. Productivity of the land with regard to land use is very low and prospecting will have no impact on the productivity of the area

Most of the Northern Cape is defined as vacant or unspecified land use (Refer Map 1).

Status of any infrastructure that may be affected

No infrastructure will be affected. Existing roads and tracks will be used and in the case of new tracks be developed it will be addressed at final closure and rehabilitation.

Status of the biophysical environment that may be affected

Topography

Namaqualand is a unique and diverse environment – owing in large part to the presence of four distinct biogeographically regions within its boundaries. The Orange River valley lies to the north and is characterized by very dry desert conditions. In the west the area is composed of coastal plains – which transition into granite hills that straddle the escarpment, before transforming into low lying Bushmanland plains to the East of Springbok.

The site is characterized by a series of mountain ranges which together make up the western escarpment. The topography ranges from gently undulating to steeply rolling, and large granitic boulders often dominate the landscape (Refer map 6).

Soil

The soils in a regional context are diverse with rock covering about 90% of the area. The soils are typically weakly structured with low organic content. These soils drain freely which results in a soil surface susceptible to erosion, especially wind erosion when the vegetation cover is sparse and gully erosion in areas where storm-water is allowed to concentrate. The soils in the area are generally not suitable for dry land crop production therefore the pre-mining land capacity is categorized as Class III grazing land. The productivity of the area is low at 12Ha/SSU. The dominant soil type of the area is the Ag Landtype, reddish soils with a high basesstatus and about 300 mm deep.

Detailed soil information is not available for broad areas of the country. As a surrogate, landtype data was used to provide a general description of soils in the study area (landtypes are areas with largely uniform soils, topography and climate). There is a single main land type in the study area, the Fc land type (Land Type Survey Staff, 1987).

The F-group of land types refer to pedologically young landscapes that are not predominantly rock and nor predominantly alluvial or aeolian and in which the dominant soil-forming processes have been rock weathering, the formation of orthic topsoil horizons and, commonly, clay illuviation, giving rise typically to lithocutanic horizons (MacVicar et al. 1974). The soil forms that epitomise these processes are Glenrosa and Mispah (MacVicar et al. 1974). The Fc unit refers to land types where lime occurs regularly in upland and valley bottom soils (MacVicar et al. 1974). The productivity of the area is very low at 8-10Ha/SSU (Refer Map 3).

Land Capability

The land is classified as wilderness area with subordinate grazing. This classification is more restrictive than pure grazing classification.

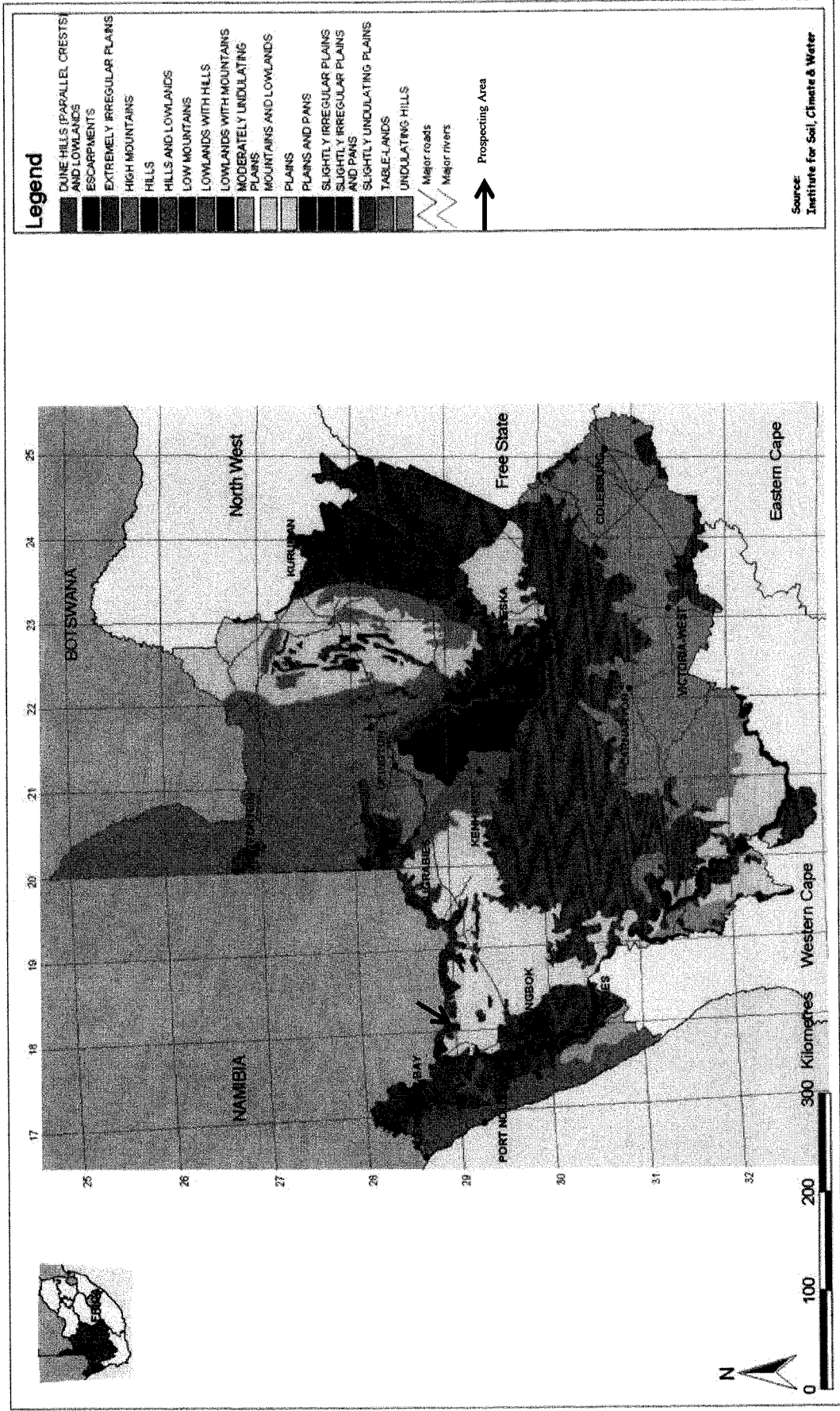
The carrying capacity of the veld is approximately 8-10ha / small stock unit (dependant on the tuning with regard to the rain/drought cycle). The aim of the rehabilitation programme is to restore the veld to its wilderness rating.

Natural vegetation / plant life

The prospecting area form part of the Gariiep Desert Bioregion within the Desert Biome and the only vegetation type is the Eastern Gariiep Rocky Desert vegetation unit.

This vegetation unit is classified from NSBA as least threatened. Although this vegetation unit is not conserved in statutory conservation areas, large parts of the area are mostly inaccessible, hence well preserved.

Map 2: Terrain Morphological units of the Northern Cape



Air Quality

The wind rose for Upington is considered representative of the wind regime in the area. The implications on proposed prospecting activities of this wind regime are as follows:

Prevailing wind direction is from the southwest and is especially strong in summer.

Winter winds have much less speed and generally blow from the north.

Infrequent berg winds blow during the winter months. These winds are hot and dry and carry regionally generated dust.

Existing dust sources in the area is vehicle generated dust on surfaced roads.

During the digging of the prospecting trenches, dust will be generated during topsoil removal, overburden removal, gravel removal, transport of the gravel along the un-surfaced roadway, replacement of overburden and replacement of the topsoil.

These impacts are however so small as to be considered insignificant especially against the background of the small scale and isolation of the proposed prospecting.

Dust must however be minimised in terms of employee health and masks must be available at all times and the applicants must comply with the prescriptions of the Mine Health & Safety Act.

Noise

No surrounding land use or user will be impacted by noise generated from the proposed operation, given both the small scale of the operation and the isolation of the site. The following noise sources will arise as a result of the proposed operations:

Earthmoving equipment generated noise (observed estimate at ± 55 dBA).

Noise must however be minimised in terms of employee health and HPD s must be available to employees at all times and the applicants must comply with the prescriptions of the Mine Health & Safety Act.

Visual Impact

The only existing visual impact as a result of mining / prospecting is the existing excavations at the site. It must be noted that the site is incredibly remote being accessed by way of servitude road. Public roads are few and far from the prospecting area and carry very little traffic while farmsteads are extremely few and far between.

Sensitive Landscapes

Areas containing untransformed natural vegetation of conservation concern, high diversity or habitat complexity, Red List organisms or systems vital to sustaining ecological functions are considered potentially sensitive. In contrast, any transformed area that has no importance for the functioning of ecosystems is considered to have low sensitivity.

Map 4: Locality of prospecting areas

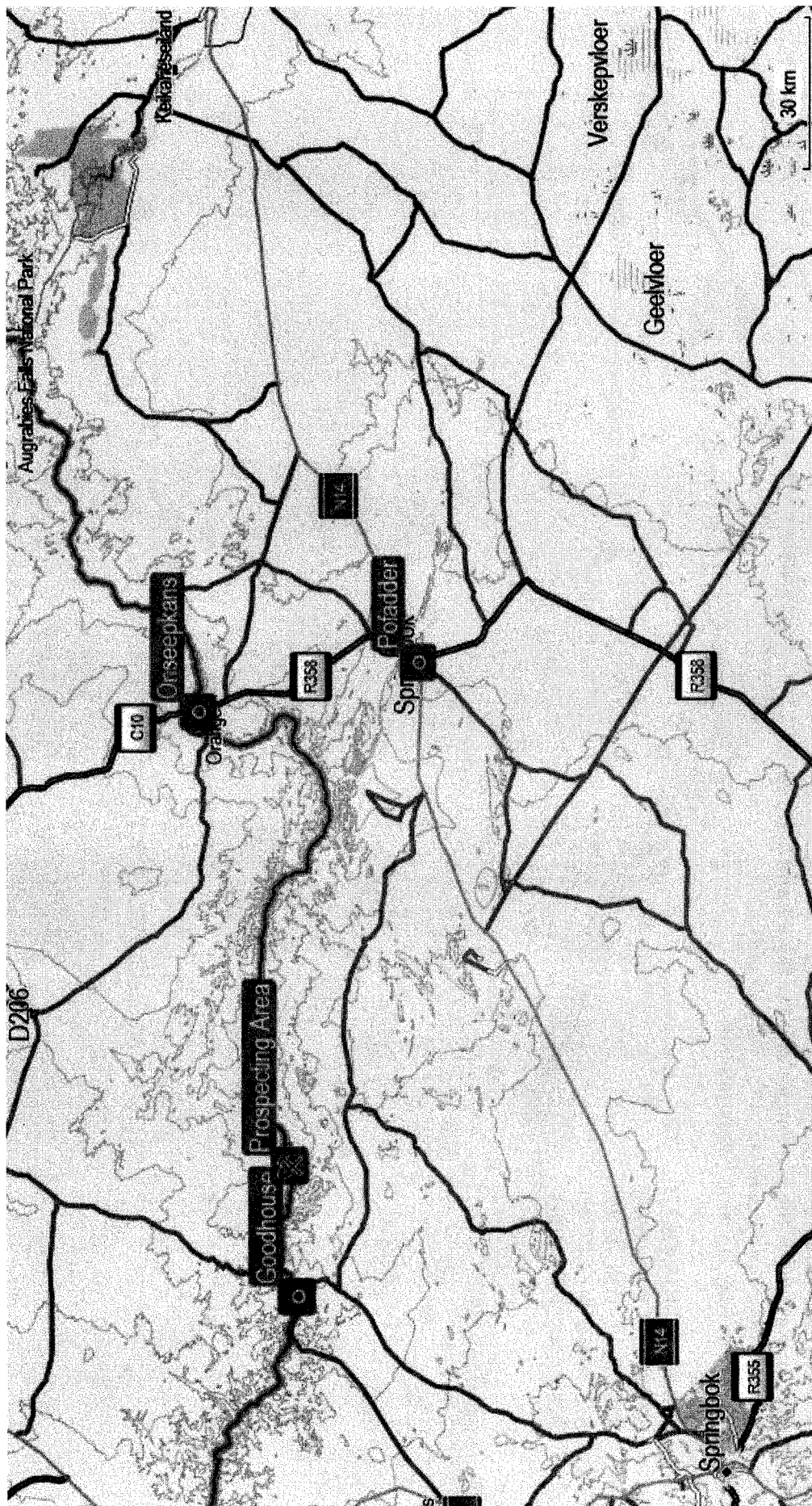
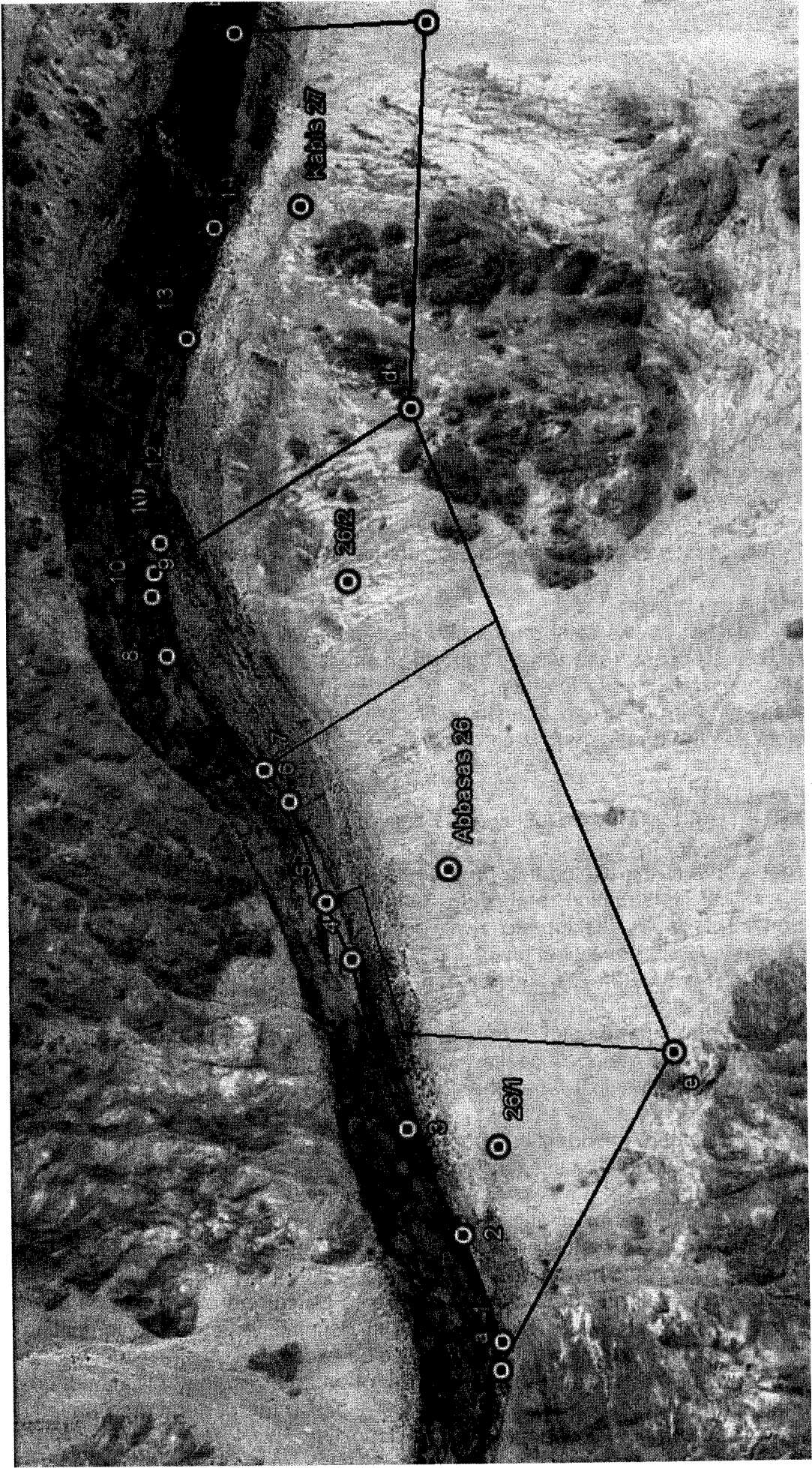


Diagram 2: Landscape of proposed prospecting area



It was further concluded by previous operators that potential exists to discover new paleo channels and traps in the area. The company's exploration programs are aimed at (i) discovering previously unknown paleo channels and traps (ii) evaluating the economic potential of potential gravel deposits.

PHASE 2 Prospecting Pits – Invasive activities

Prospecting pits (usually with a 25m² foot print) will be positioned at targets identified during geological mapping and the geophysical surveys. An estimated 10 prospecting pits are planned during this phase with an average depth of 5m.

During this pitting programme samples are collected every metre and logging will be done by a qualified geologist who will record the lithology. Apart from gravel resources calculations the information will be used to construct gravel thickness, overburden thickness and bedrock elevation contour plans.

The prospecting will be backfilled if results are unfavourable or left open for the purpose of continued bulk sampling by means of box cuts. The holes will be filled with overburden and covered with topsoil

Such pit development will be the same as for prospecting trenches and box cuts but only on a smaller scale due to the shallow nature of the gravel and is to occur as shown in diagram 3 below:

PHASE 3 Bulk sampling

After prospecting pits has delineated alluvial traps and or paleo channels, a decision will be made whether to proceed to Bulk Sampling.

A bulk sample will consist of a box cut and the footprint of the proposed box cuts will be 25 X 25 meters (625m²). There will only ever be one box cut open at any given time and it is anticipated that no more than 3 such cuts will be developed.

Bulk sampling will consist of the following procedures (Diagram 3):

- Remove topsoil to either side of the eventual box cut lateral extension. Note that the upper 40cm will be treated as topsoil as it contains a seed bank. Say 625m² X 4 = 250m³
- Then remove the overburden average 2 meter below the "topsoil" cover to a separate stockpile berm. Say 625m² X 1.6m = 1000m³
- Extract alluvial material to a depth of 5m. With a bench method of excavation the footprint will be reduced to 20X 20 meter = 400m² Say 400m² X 3m = 1200 m³ alluvial gravel
- From 3 pits 3600m³ alluvial gravel will be extracted or 9360 tonnes at an SG of 2.6.
- An average of 3000 tonnes could then be processed from each of the three potential gravel deposits.

The following are pertinent with regard to the box cuts development:

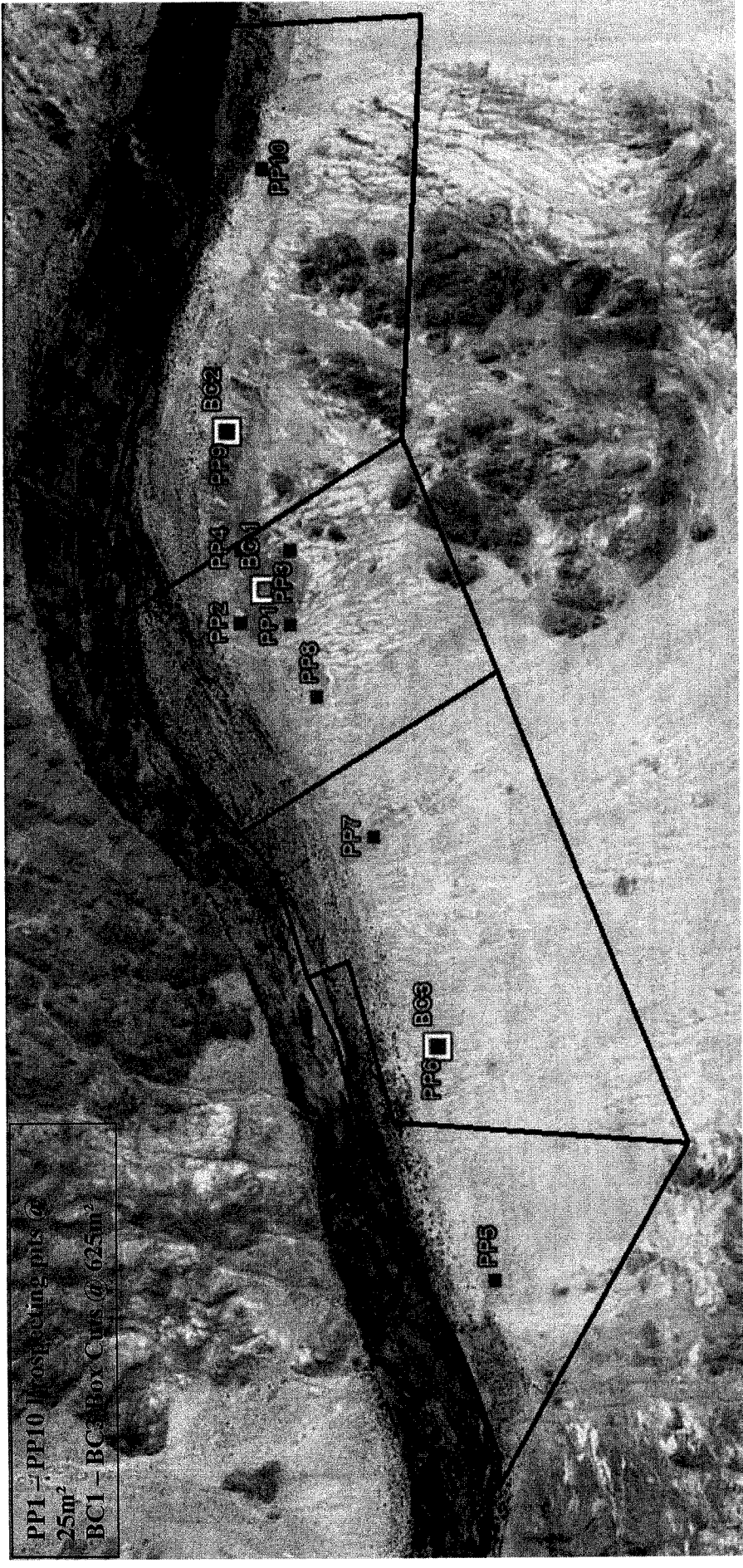
The box cut footprint will be determined by:

- Overburden depth. The deeper the overburden, the bigger the footprint will be at the surface.
- The angle of repose and safety of the sidewalk in terms of slumping. The operator on site must determine these, as they are in situ safety considerations.

The removed gravel will be sent through an in-field screening plant and only the concentrate will be trucked to the processing plant.

The applicant requires 500tonnes of concentrate product to obtain a representative sample for sufficient statistical analysis. 500tonnes of concentrate represents 20% of the ore therefore 80% will be backfilled through infield screening.

Diagram 4: Landscape with positions for prospecting pits with the option of bulk sampling



Decommissioning phase

Regulations 56 to 62 outline the entire process of mine closure, both as a guide to the process to be followed for mine closure, and also to address the legal responsibility with regard to the proper closure of operations. In terms of Section 37 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), the holder of a right is liable for any and all environmental damage or degradation emanating from his operation, until a closure certificate is issued in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002).

"An application for a closure certificate must be accompanied by an environmental risk report which must include-

- (a) the undertaking of a screening level environmental risk assessment where-
- (b) the undertaking of a second level risk assessment on issues classified as
- (c) assessing whether issues classified as posing potential significant risks are acceptable without further mitigation;
- (d) issues classified as uncertain risks be re-evaluated and re-classified as either posing potential significant risks or insignificant risks;
- (e) documenting the status of insignificant risks and agree with interested and affected persons;
- (f) identifying alternative risk prevention or management strategies for potential significant risks which have been identified, quantified and qualified in the second level risk assessment;
- (g) agreeing on management measures to be implemented for the potential significant risks

2.1.3 Listed activities (in terms of the NEMA EIA regulations)

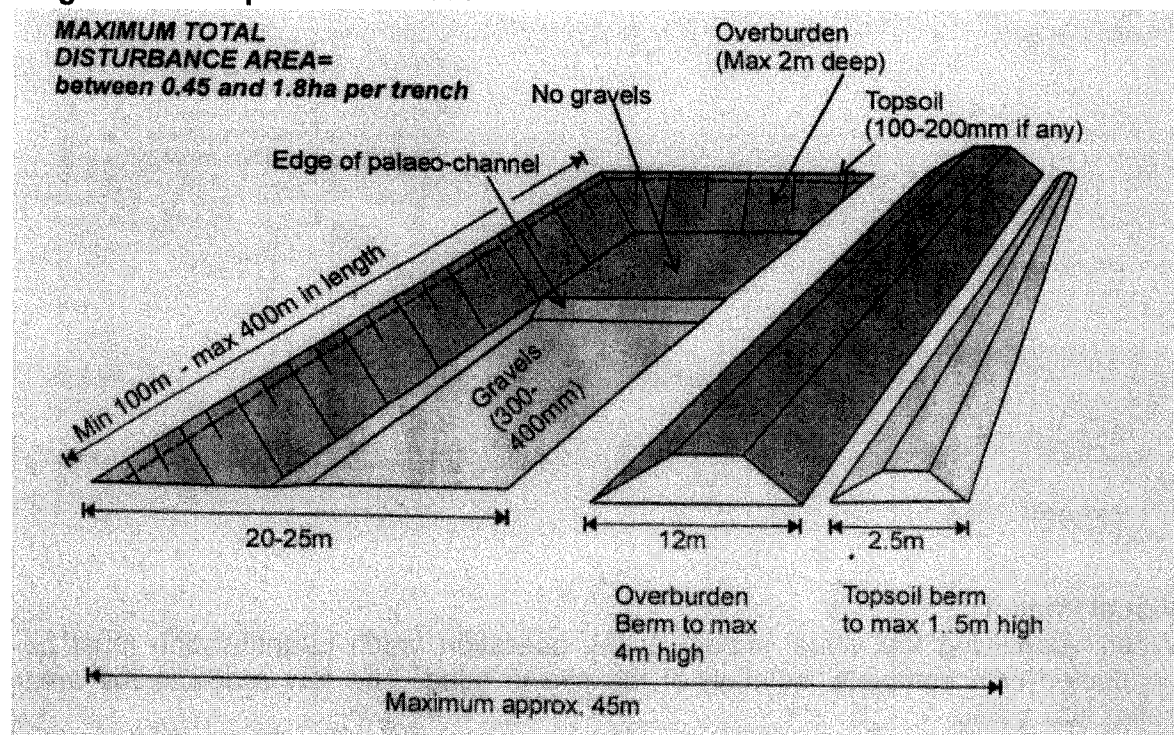
None of the activities listed above is a listed activity in terms of the Environmental Impact Assessment Regulations published in terms of Chapter 5 the National Environmental Management Act (Act No. 107 of 1998) except for the prospecting itself.

2.2 Identification of potential impacts

2.2.1 Potential impacts and listed activities

This impact assessment deals with all impacts and the implementation of the mitigating and management measures prescribed in the EMP will address all the existing impacts and after implementation of the mitigating measures most significant impacts can be classified as insignificant.

Diagram 5: Footprint of box cut



Topography

The impact of prospecting pits will be negligible but if developed into a box cut the impact on topography will be twofold:

- The excavation itself will be excavated to a maximum depth of 1m over a maximum length of 400m (but more probably 100m) to an average width of between 20-25m (22m used in all calculations)
- The overburden will be dumped in a heap to 4m high across a width of 12m as shown in the diagram above.

Duration of impact Life of phase 2 and 3

Probability of impact Definite

Significance of impact Insignificant but increases as cumulative impact of 3 box cuts is considered

It must be noted that the overburden will bulk by 26% when backfilling. As such, a mound will remain after backfilling of the pit. Such mound will eventually settle without interference. The amount of gravel removed to the plant will have a negligible impact on the eventual topography as shown in the diagram 6 below:

Duration of impact	Life of prospect.
Probability of impact	Possible
Significance of impact	Insignificant with implementation of mitigating and management measures as described in the EMP below

Land Capability

The land is classified as wilderness area with subordinate grazing. This classification is more restrictive than pure grazing classification. In any event, the carrying capacity of the veld is between 8-10ha / small stock unit, but the aim of the rehabilitation programme is to restore the veld to its wilderness rating.

If we assume the worst-case scenario, in which all 3 box cuts are developed to 400m in length to search for the palaeo channels, then a total of 5.4 ha (1.8ha/trench x 3 excavations) will be temporarily lost as a wilderness area (and as grazing).

The impact on grazing can be quantified and prospecting will result in the temporary loss of grazing for less than 1 small stock unit.

Duration of impact	Phase 2 and 3
Probability of impact	Definite
Significance of impact	Insignificant and temporary per site but increases when the cumulative impact is considered (until full rehabilitation of all sites has taken place).

Natural Vegetation

If we assume the worst-case scenario, in which all 3 box cuts are developed to 400m in length to search for the palaeo channels, then a total of 5.4 ha (1.8ha/trench x 3 excavations) of natural vegetation will be temporarily disturbed when topsoil (and its vegetation content) is removed to the topsoil berm.

Duration of impact	Phase 2 and 3
Probability of impact	Definite
Significance of impact	Insignificant when considered separately but increases when the cumulative impact is considered - but still insignificant.

Animal Life

The animal life around the affected area will be chased away by the presence of such activities. There is a vast expanse of similar habitat type around every proposed activity area and it is unlikely that any impact on animal life will occur from the proposed activities. Should any impact occur it would be insignificant.

Duration of impact	Life of operation.
Probability of impact	Probably
Significance of impact	Insignificant

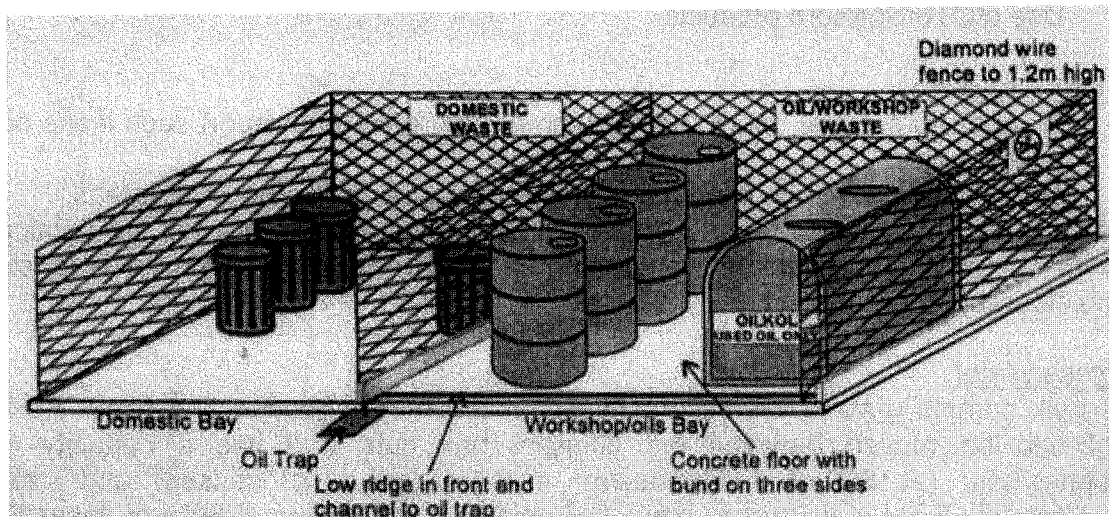
Surface Water

No impact on natural surface water quality or quantity will occur through the proposed prospecting. However the potential exists for fuel/oil spillage onto the surface of the soil. The potential impact of such an occurrence will be limited by the implementation of the management and mitigating measures.

Duration of impact	Life of mine
Probability of impact	Possibly
Significance of impact	Insignificant

Domestic Waste Management Facilities:

Each prospecting site must be provided with a refuse bin. Refuse will be removed daily from that bin for transport to the main facility located at the processing area. Such facility must be developed according to the following guidelines for temporary storage of domestic and industrial waste:



Oil/Fuel Leak Management:

Fuel receipt, storage and dispensing:

In the management of fuel supply, receipt, storage and use, the following procedures will be followed, cautions taken and facilities built to properly manage this operational sector:

- The fuel delivery bowser driver will be cautioned to adhere to safe driving speeds and drive cautiously on the gravel roads.
- During dispensing of fuel to other facilities (plant and other tanks) or field vehicles via tanker, the dispensing vehicle is to be fitted with suitable pumps and funnel extensions to reduce the risk of spillage in the transfer of fuels.

On site repairs

No workshops will be required at the prospect and all scheduled mobile plant servicing will take place at workshop facilities at Witbank or one of the other farm workshops or major towns in the area.

Emergency repairs on site:

In the event of a breakdown repair being required in the field, the staff should be trained in use of drip trays and suitable funnels (not to drain oil into the sand) for filling and draining of lubricants and the staff shall be provided with such equipment to prevent oil contamination.

In addition:

- Used/replaced filters, hoses, belts, cloths, etc. are to be placed in a bin for return to the used oil and lubricant storage area which is to be constructed as shown above. Used filters are not to be buried at the site of repair (nor discarded in the excavation to be backfilled).
- In the event of soil contamination, the soils are to be treated with a suitable decontaminant such as the OT8 product range or Spillsorb or similar product.

- Fine tailings: Approximately 15% of the run of plant will be disposed of also as backfill into the excavation.
- Concentrate: Amounts to less than 1% of material passing through the plant. It will also be dumped as backfill in the excavation.

2.2.2 Potential cumulative impacts

The only identified land use is small stock grazing and due to the temporarily nature of change in land use and small scale of the operation prospecting will not have any impact and the land will revert back to its former use grazing with no impact on production.

2.2.3 Potential impact on heritage resources

The area has very little potential to contain any heritage resources as it has been extensively mined in the past but should any fossils be discovered or unearthed in the process of prospecting, the prospecting right holder will contact a South African Museum or University which employs palaeontologists so that the necessary palaeontological salvage operations can take place. No other heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes are present on the mining area.

2.2.4 Potential impacts on communities, individuals or competing land uses in close proximity

The only identified land use is small stock grazing and due to the temporarily nature of change in land use and small scale of the operation prospecting will not have any impact and the land will revert back to its former use grazing with no impact on production. The area is farmland that is not close to any settlement therefore no land development projects are in progress.

2.2.5 Confirmation that the list of potential impacts has been compiled with the participation of the landowner and interested and affected parties

All proposals received during the consultation process have been addressed in this EMP.

2.2.6 Confirmation of specialist report appended.

No specialist reports are deemed necessary as no sensitive areas are included in the proposed area and due to the non-invasive nature of the proposed project.

All removed topsoil will be placed in heaps not exceeding 1.5m. The purpose of such restriction is an attempt to retain a viable seed bank within the stockpiled topsoil. When the excavation is to be rehabilitated, the procedure entails replacement of the overburden, levelling of the replaced overburden surface, replacing of topsoil and allowing natural re-vegetation. The topsoil must also be replaced over the disturbed overburden stockpiling area.

Land Capability

The impact on the wilderness / grazing land capability of the affected areas will in all cases be rehabilitated and mitigated when the procedures as described above have been implemented.

Natural Vegetation

The vegetation must be removed along with the topsoil removed from the excavations and overburden dump footprint to be placed in the topsoil berm. Such berm may not measure higher than 1.5m in an attempt to preserve a viable seed/bulb bank.

After backfilling of the excavations with overburden, the stockpiled topsoil is replaced over the excavation & dump footprint (with its resident seed bank) and allowed to re-vegetate naturally. No unnecessary access into the surrounding veld is to be permitted.

Tracks

No vegetation will be removed to develop tracks as experience has shown that by not removing existing vegetation from area disturbed by traffic, the impact is that the vegetation is merely flattened and that such vegetation recovers quickly.

Vehicles must use the same tracks and no haphazard turning in virgin veld is to be permitted.

Animal Life

The animal life around the affected area will be chased away by the presence of such activities. There is a vast expanse of similar habitat type around every proposed activity area and it is unlikely that any impact on animal life will occur from the proposed activities.

Surface Water

No impact on natural surface water quality or quantity will occur through the proposed excavations. However the potential exists for fuel/oil spillage onto the surface of the soil. The potential impact of such an occurrence will be limited by the implementation of the measures as proposed above.

Ground Water

It is possible (though improbable) that bulk sampling will reveal some groundwater, in that such prospecting excavations will/may take place in palaeo-channels. The impact will be negligible given the small size of the excavations and that up to 70% of the gravels will be returned to the hole before backfilling with the overburden.

Processing Water

Maximum water requirements will be in the order of 1.5-2.0kl per day. Water will be recycled in the fine tailings dam/dump in the existing excavation.

Rehabilitation of access roads

No access roads or infrastructure will be constructed only existing farm roads will be used and when or if bulk sampling is implemented temporary storage will be provided in the form of mobile containers.

Rehabilitation of the office/camp site

No permanent structure will be build and all operations will be run from one of the many un-used farmsteads on the communal land and by providing for mobile containers.

Rehabilitation of vehicle maintenance yard and secured storage areas

No vehicle maintenance yard or secure storage areas will be constructed as major repairs and services will be done in one of the major towns. Emergency repairs will be done according to the prescripts provided for in the EMP paragraph 3 and no infrastructure will be required.

Rehabilitation of surface disturbance excavations

In determining the quantum, the following assumptions apply:

1. That 1 prospecting excavations require rehabilitation
2. That 3km tracks require rehabilitation.

The following calculation applies:

Prospecting excavations (Assume 1m deep pit 400m long X 20m wide)

Rehabilitation at the prospecting excavations will consist of backfilling of the excavations, top soiling of pit and levelling of the site.

Backfill of overburden	8000 m ³ @ R 6.00 /m ³	R48 000.00
Spread topsoil	4000 m ² @ R 2.00 / m ²	R 8 000.00
SUB-TOTAL		R56 000.00

Roads and tracks

All tracks to be ripped with 2 groped scarifier

Ripped 3km 9000 m ² @ R0.15 /m ²	R 1 350.00
SUB-TOTAL	R 1 350.00

Cost of rehabilitation: R57 350.00

Final rehabilitation

All equipment and other items used during the prospecting period must be removed from the site. Waste material of any description, including receptacles, scrap, rubble and tyres, must be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.

Extent:	1Ha
Duration of rehabilitation:	1 day
Equipment required:	
Manual labor @ R500.00/day for clean-up	R 2 500.00
Cost of rehabilitation:	R 2 500.00

The applicant is willing to escalate the total estimated amount of R 59 850.00 that is needed for rehabilitation to R60 000.00 that is more than is needed for the rehabilitation of damage to be caused by the operation, both at sudden closure during the normal operation of the project or at final, planned closure.

All scrap and other foreign materials will be removed from the area and disposed of as in the case of other refuse, whether these accrue directly from the prospecting operation or are brought on to the site.

Removal of these materials shall be done on a continuous basis and not only at the start of final rehabilitation and closure.

The overburden from the trenches will be back filled into the holes and covered with topsoil. The area will be profiled to blend in with the topography of the surrounding environment.

The mitigating measures described in paragraph 3 are compatible with these closure objectives.

6.2 Closure objectives and their extent of alignment to the pre-mining environment
The environment affected by the prospecting operations shall be rehabilitated, as far as is practicable, to its natural state. Land use will be the same as before prospecting with the same production with regard to grazing by livestock. The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof.

6.3 Confirmation of consultation

A copy of the scoping report that includes environmental objectives in relation to closure was made available to the landowner and all other interested parties for comment. All comments received were addressed in this EMPR.

7 REGULATION 52 (2) (g): Record of the public participation and the results thereof.

7.1 Identification of interested and affected parties.

7.1.1 Name the community or communities identified, or explain why no such community was identified.

The community of Steinkopf and Concordia is the lawful occupier of the Farm Abbasas and Kabis. The property is registered in the name of the Government Republiek van Suid-Afrika

7.1.2 Specifically state whether or not the Community is also the landowner.

The land is registered to the Republic of South Africa and the holder Department is The Department Land Affairs. The nama Khoi local authority on behalf of the Steinkopf and Concordia community can however be regarded as the landowner or lawful occupier.

7.1.3 State whether or not the Department of Land Affairs been identified as an interested and affected party.

No as the Nama khoi local authority is regarded as the management authority of the land on behalf of the local community and there are no land claim registered against the properties

Consultation has taken place by means of registered letters and/or personal communication with the local authority as landowner and representing the broader community of the region. A letter to this regard is attached as Appendix 3.

All comments were supposed to be directed to the regional director DMR with copies to the applicant.

7.2.6 Information regarding objections received.

No objections against the proposed prospecting operation that need to be dealt with by the REMDEC committee were received. All comments received were addressed as part of the EMP.

7.3 The manner in which the issues raised were addressed.

No objections against the proposed prospecting operation received

8 SECTION 39 (3) (c) of the Act: Environmental awareness plan.

8.1 Employee communication process

General environmental awareness will be fostered among the project's workforce to encourage the implementation of environmentally sound practices throughout its duration. This will ensure that environmental accidents are minimized and environmental compliance maximized.

Environmental awareness will be fostered in the following manner:

- a) Induction course for all workers on site, before commencing work on site.
- b) Refresher courses as and when required
- c) Daily toolbox talks at the start of each day with all workers coming on site, where workers can be alerted to particular environmental concerns associated with their tasks for that day or the area/habitat in which they are working.
- d) Taking part in national and international environmental campaigns like National Marine Week, National Labour Day, National Wetlands Day etc.
- e) Displaying of information posters and other environmental awareness material in the general assembly points.

8.2 Description of solutions to risks

Specific environmental awareness performance criteria will form part of the job descriptions of employees, to ensure diligence and full responsibility at all levels of the organisational work force.

General environmental awareness will be fostered among the project's workforce to encourage the implementation of environmentally sound practices throughout its duration. This will ensure that environmental accidents are minimized and environmental compliance maximized.

8.3 Environmental awareness training.

The goal of training is to enable a shared understanding and common vision of the environment, the impact of a mining operation on the environment (and why this is important) and the role of mining personnel in terms of environmental management and compliance.

The induction course will compose of the following steps:

- The first step will include background discussion of the environment concept: of what it comprises and how we interact with it.