

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Ruan Brand
Tel: 0214628672
Email: RBrand@sahra.org.za
CaseID: 17045

Date: Thursday June 15, 2023
Page No: 1

Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Samara Mining (Pty) Ltd

In order to prospect for diamonds, Samara intends to execute a comprehensive and systematic exploration programme to develop the concession areas. Both invasive and non-invasive methods will be used. This programme will be executed in three phases and will commence with non-invasive methods and thereafter progress to invasive exploration methods. The Prospecting Work Programme (PWP) outlines a programme consisting of three phases which are only executed once results of the previous phase substantiate activation and detail planning of the next phase. Phase 1 (Non-invasive Methods): This phase will use non-invasive methods that will consist of desktop literature studies, geophysical surveys within the Concession Areas, geophysical data processing and interpretation, compilation of a GIS database, geological modelling and delineation of potential diamond trap-sites which will form the knowledge base to plan and design the exploration sample programme. This phase will be executed in eight stages. Phase 2 (Invasive Exploration Sampling): An invasive exploration sample programme will be undertaken. This programme will consist of reconnaissance exploration sample drilling within the Concession Areas. The results of the reconnaissance drilling programme will firstly identify which of the potential trap-sites carry a positive grade and secondly which of the positive trap-sites have an overall grade and footprint size to justify either further infill geophysical survey lines and/or infill detail drilling to increase confidence towards an estimate diamond resource. The planning and design of the in-fill geophysical survey and in-fill drill exploration programmes will lead to Phase three. This phase will be executed in four stages. Phase 3 (Non-invasive Geophysical Surveys, Invasive Infill Drilling and Bulk Sampling): This phase will consist of non-invasive detail infill geophysical surveys and invasive detail infill drilling within priority trap-site features. Results of the first detail infill exploration work will determine the level of confidence reached to either justify resource estimation and preliminary mine plan design or do a second programme of detail infill drilling to then reach a confidence level for resource estimation and preliminary mine plan design. Preliminary mine plan will be followed by a trench bulk sampling programme to simulate mining, finalise the mine plan and gather geotechnical and production data for the feasibility study. This phase will determine the feasibility and decision on proceeding with the mining project in concession 4C and 5C and will be executed in eleven stages.

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The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting an Environmental Impact Assessment (EIA) report under section 38(8) of the National Heritage Resources Act, No 25 of 1999 (NHRA) for a Diamond Prospecting Right in the Offshore Concession (sea concession 4C and 5C) off the West Coast, South Africa.

SAHRA issued a comment on the DSR in September 2021 which requested the submission of a Maritime Heritage Impact Assessment (MHIA). This EIA now contains a MHIA as well as more details about the methods to be used for the proposed diamond prospecting activities. The updated methods now include bulk seabed sampling using a crawler vehicle which will use water jets to trench approximately 20 trenches, 240m (length) X 40m (width) X 1-4m (depth) with the loosened seabed sediment to be pumped onboard a specialised vessel to be sorted. As such, this activity heavily disturbs the seabed.

The MHIA assessed the potential impacts to palaeontological, prehistoric archaeological resources, and maritime archaeological resources. The MHIA adheres to SAHRA's minimum standards for HIAs and concludes with there being a very low-to-no-impact to heritage resources as there are already mitigation measures in place to avoid known sensitive heritage areas, such as the Namaqua Fossil Forest. The MHIA includes several other recommended mitigation measures:

- The Environmental Management Program (EMPr) should include provisions for the collection of representative examples of the fossils that occur;
- "Run of mine" material should be monitored for fossils as part of the normal sampling and mining process;
- Potential fossil material should be collected for later identification and evaluation and the company must apply to SAHRA for a general permit to destroy, damage, excavate, disturb, and collect fossils in line with section 38(4) of the NHRA;
- A few small bulk samples of shells are occasionally collected to sample the typical assemblage at various points in the sampling/mining area;
- The geophysical contractor will flag any anthropogenic seabed anomaly during geophysical data processing and those areas should be excluded from the bulk seabed sampling with at least a 50m buffer around each anomaly. These anomalies should also be reported to SAHRA without delay;
- If an undetected wreck is encountered during seabed sampling, that work in the area must cease immediately and SAHRA must be contacted without delay. SAHRA and a suitably qualified maritime archaeologist will then advise on how to proceed after consultations; and

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Page No: 3

- Seismic Chirp data should be made available for archaeological research purposes.

The SAHRA is satisfied with the recommendations to mitigate impacts to heritage resources and notes that these recommendations are accounted for in both EIA report and the accompanying EMPr. As such, as long as these mitigation measures are adhered to, the SAHRA has no objection to the development proceeding. However, it is noted that the company must be in possession of a valid permit from the SAHRA, as described in the recommended mitigation measures, before the seabed sampling activities can occur. The SAHRA looks forward to receiving this permit application and assessing it, but it must be noted that the SAHRA cannot guarantee that this permit application will be successful and recommends that this permit is applied for as soon as possible.

Please note that all updates and/or changes to the project, supporting documentation, correspondence, reports, or any other work relating to the project must be uploaded to the case on SAHRIS to provide SAHRA with the opportunity to comment. SAHRA does not accept emailed documents or hard-copy documents received via post.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Ruan Brand
Heritage Officer
South African Heritage Resources Agency

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Page No: 4

Briege Williams
Heritage Officer
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/581443>
(DMR - NC, Ref: NCS 30/5/1/1/2/1 (12855) PR)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.