



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

Directorate: Mineral Regulation: North West Region,
Private Bag A1, Klerksdorp, 2570 Cnr Margaretha Prinsloo & Voortrekker Streets
Vaal University of Technology Building, Klerksdorp, 2571

Enquiries: Mrs. Linah Tshisevhe **Tel:** (018) 487 4300 **Fax:** (018) 487 4350

E-Mail: tshisikhawe.tshisevhe@dmr.gov.za **Ref:** NW 30/5/1/1/3/2/1/ (12466) EM

REGISTERED MAIL

The Manager
Singo Consulting (Pty) Ltd
(Alkemu Precision (Pty) Ltd)
Private Bag x 7214
Postnet Suite 125
Witbank
1035

Attention: Mr. K Singo

Fax: 0865144103

COMMENTS ON A BASIC ASSESSMENT REPORT (BAR) AND ENVIRONMENTAL MANAGEMENT PROGRAMME (EMPR) SUBMITTED IN TERMS OF REGULATION 19 (1) OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO.107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 AS AMENDED IN SUPPORT OF AN APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION IN RESPECT OF PORTION 1 AND THE REMAINING EXTENT OF THE FARM SOMERVILLE 62 IQ, PORTION 1, 2, 3, 4, 5, 6, 7, 9, 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30 AND THE REMAINING EXTENT OF THE FARM KLERSKRAAL 65 IQ, REMAINING EXTENT OF THE FARM, EILEEN'S HOME 67 IQ, PORTION 10, 11, 13, 19 AND REMAINING EXTENT OF BOVENSTE OOG VAN MOOIRIVIER NO. 68 IQ AND THE FARM BOVENSTE OOG VAN MOOIRIVIER NO. 271 IQ, SITUATED IN THE MAGISTERIAL DISTRICT OF VENTERSDORP, NORTH WEST REGION BY ALKEMU PRECISION (PTY) LTD.

1. The above-mention matter refers.

2. This letter serves to inform you that your BAR was reviewed by this office and was not accepted since it does not contain the information that is necessary for this office to consider and come to a decision on the application. Amongst other things your BAR does not contain and/or address the following:
- 2.1 Your application form for Environmental Authorisation (EA) submitted to this office indicated that the proposed prospecting application is for Drilling of boreholes however, there are several sections in your BAR which is referring to prospecting using bulk sampling. Please note that this is unacceptable and your report has to be amended to reflect activities as per the EA application form.
 - 2.2 It was noted that a total number of 10 boreholes will be drilled during the prospecting period. You are requested to provide the total area of disturbance per borehole site. This information is crucial in order to determine the required financial provision for the rehabilitation of the disturbed environment.
 - 2.3 Item 3 of the BAR submitted requires that you provide information on baseline environment of the proposed site however, item 3.1.6.1 (surface water) of your report is based on literature review. You are therefore requested to provide information in respect of the actual observation on site.
 - 2.4 Item 3.7.1 of your report indicates that no graves have been identified through desktop investigations. This statement was found to be unacceptable by this office as the BAR should not be based on desktop studies therefore, you are required to consult South African Heritage Resource Agency (SAHRA) which should give you guidance if it is considered necessary to conduct Phase I of Heritage Impact Assessment study. You are requested to submit proof of consultation with SAHRA and their response thereof.
 - 2.5 Based on your BAR submitted, the proposed prospecting area is located in areas which falls under the category of Critical Biodiversity Area 1 and 2 (CBA1 and 2). Please note that in terms of the North West Biodiversity Sector Plan which was published by the Department of Rural, Environment and Agricultural Development in 2015, prospecting activities are restricted in such

areas. In terms of the plan it is indicated that site-specific conditions and controls can be applied when it is unavoidable.

- 2.6** In light of the above, you are required to undertake a Biodiversity specialist study and a report must be submitted to this office. This will assist the competent authority to take a decision on the application in question based on the specialist recommendations. Please note that the appointed specialist must meet the requirement as stipulated in terms of Regulation 13 of NEMA: EIA Regulations, 2014 as amended.
- 2.7** Considering that some portions of your application falls within the water resources (a river, dam and wetland) you are required to consult the Department of Water and Sanitation regarding all relevant water uses as per the proposed project. Results of consultation must be submitted to this office.
- 2.8** Some sections of your report are making reference to prospecting of Coal which does not form part of your application. You are also requested to address such issue accordingly.
- 2.9** You are further requested to submit a clear topographical map which clearly shows the environmental features on site which should be on **A3 paper size**, must have legend, North point and must be printed in colour.
- 3.** Your public participation process was also evaluate and found to be unacceptable since the details of such process including the copies of the supporting documents were not provided which include the following:

 - 3.1** Copies of signed attendance register and minutes of the meeting held with interested and affected parties on the 14th November 2018;
 - 3.2** Proof of consultation with the Department of Rural, Environment and Agricultural Development and the results of such consultation;
 - 3.3** How issues of objection raised by the interested affected parties were addressed particularly issues raised by Mr. Henri Fouche and PSN Incorporated on behalf of Kruger Family Trust.

4. Kindly also note that your proposed quantum of financial provision to the amount of **R57 406. 00** was also evaluated and could not be accepted. This is because the outdated master rates were used. You are therefore requested to submit a revised financial provision quantum which reflect all components relevant to the proposed prospecting activities. The requested quantum must be calculated using the current master rates and must be accompanied by the information showing the total area of disturbance per borehole site as requested on item 2.2 above.
5. In order for this Department to efficiently evaluate your BAR, you are hereby requested to revise your BAR of which two copies of the revised report must be manually submitted to this office **on or before the 28th February 2019**. **The revised BAR consolidate all comments specified on paragraph 2, 3 and 4 above.**
6. **It must be noted that if the EAP/applicant is unwilling or unable to comply with the prescribed timeframes and the requirements set out on the Appendix 1 of the EIA Regulations, 2014 as amended or to adequately address the comments specified above, your application for Environmental Authorization will be refused without any further communication to you.**
7. Further note that Department reserves the right to revise initial comments and request further information to you, based on the revised information.
8. Should you have any query regarding the contents of this letter, kindly contact Mrs. Linah Tshisevhe on the number reflected above.

Yours faithfully,


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7 REGIONAL MANAGER: MINERAL REGULATION
NORTH WEST REGION
DATE: 29/01/2019

ALL CORRESPONDENCE SHOULD BE ADDRESSED TO THE REGIONAL MANAGER: MINERAL RESOURCES: NORTH WEST REGION. PLEASE QUOTE THIS OFFICE FILE NUMBER AS REFERENCE.