APPENDIX A: PLAN OF STUDY FOR EIR: APPROACH TO THE ENVIRONMENTAL IMPACT ASSESSMENT

The Environmental Impact Assessment is a comprehensive evaluation and study phase that addresses all the issues raised in the Scoping Phase. It is a substantial phase that has seven key objectives:-

- 1. Describe the biophysical and socio-economic environment that is likely to be affected by the proposed development.
- 2. Undertake specialist studies to address the key biophysical and socio-economic issues.
- 3. Assess the significance of impacts that may occur from the proposed development.
- 4. Assess the alternatives proposed during the Scoping Phase.
- 5. Provide details of mitigation measures and management recommendations to reduce the significance of impacts.
- 6. Provide a framework for the development of Environmental Management Plans.
- 7. Continue with the public participation process.

SCOPE AND INTENT OF THE EIA PHASE

This phase includes the following steps:

- 1. **Specialist Studies** which include the specialist assessments identified in the Scoping Report and any additional studies required by the authorities. This requires the appointment of specialists to gather baseline information in their fields of expertise, to assess the impacts and make recommendations to mitigate negative impacts and optimise benefits. The resulting information is synthesised into the Environmental Impact Assessment Report (EIAR).
- 2. Environmental Impact Assessment Report. The main purpose of this report is to gather and evaluate environmental information, so as to provide sufficient supporting arguments to evaluate overall impacts, consider mitigation measures and alternative options, and make a valued judgement in choosing the best development alternative. The EIAR is made available for public and authority review. The availability of the report is advertised in the local newspaper and is situated at easily accessible locations.
- 3. **Issue Response Trail** which compiles comments, issues and concerns raised by I&APs and the authorities and the relevant responses to these comments.
- 4. **Environmental Management Programme** informs the client and the technical team of the guidelines which will need to be followed during the various phases of the project to ensure that there are no lasting or cumulative negative impacts of the construction process on the environment.
 - The standards and guidelines that must be achieved in terms of environmental legislation and IFC requirements.
 - Mitigation measures and environmental and social specifications which must be implemented for all phases of the project in order to minimise the extent of environmental and social impacts, to manage environmental and social impacts and where possible to improve the condition of both the biophysical and social environment.
 - Provide guidance through method statements that are required to be implemented to achieve the environmental and social specifications.
 - Define corrective action that must be taken in the event of non-compliance with the specifications of the EMPr.
 - Prevent long-term or permanent environmental degradation.

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- 5. **Public Participation Process.** As for the Scoping Phase, opportunities are provided for interested and affected parties to voice concerns and issues regarding the project. At this stage the project details may have changed in response to the preliminary findings of the Scoping Report. I&APs and key stakeholders are also given the opportunity to review the Environmental Impact Assessment Report and the Specialists Reports before they are submitted to the authorities. These comments are then included in the Final EIAR, and modifications and changes to this report and the specialist reports are made in response to these comments, if required.
- 6. **Environmental Authorization and Appeals Process**. Upon thorough examination of the various reports, the authority will either issue an environmental authorization, which either authorises the project or rejects it, or they may require further details to clarify certain issues. Should authorisation be granted, it usually carries Conditions of Approval. The proponent is obliged to adhere to these conditions. Once the authorization has been issued, it is publicised and the public are given 20 calendar days from the issuing of the authorization to lodge an appeal with the authorities. An appeal must be submitted within 30 days after the lapsing of the 20 day notice of intention to appeal

THE PUBLIC PARTICIPATION PROCESS

Upon review of the comments received from EANC, the Public Participation Programme (PPP) will likely include the following:

- Notice of the EIAR and Specialists Reports availability will be placed in the *Die Burger* newspaper.
- Registered I&APs will be informed in writing either by email or post.
- I&APs will be given 40 calendar days to review and comment.

After the public review period, all relevant comments and questions received from the public will be considered and responded to in an Issues and Response Trail, which will be included in the Final EIAR. These final documents, which may require editing, will then be formally submitted to the authorities for final review and decision-making.

The competent authority's decision will be advertised in the newspaper mentioned above and registered I&APs will be informed within seven days of receipt of the Decision. Once the public have been notified of the Environmental Authorisation they will also be notified of the appeal provisions and process related thereto.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR)

The following is the proposed Table of Contents for the Environmental Impact Assessment Report (EIAR):

CHAPTER 1: INTRODUCTION

This Chapter will provide background information on the proposed project and the overall objectives of the EIAR.

CHAPTER 2: CONTEXT AND JUSTIFICATION FOR THE PROJECT

This Chapter will include details and experience of the proponent, the proponent's environmental and sustainable development policies, the details and expertise of the Environmental Assessment Practitioner (EAP) who compiled this report, an overview of the project and its location and a detailed motivation and justification (need and desirability) for the project.

CHAPTER 3: LEGISLATED REQUIREMENTS

This Chapter will outline the requirements of prevailing South African legislation as well as relevant international principles, performance standards and guidelines, and describes the process that will be followed during the Environmental and Social Impact Assessment.

CHAPTER 4: PROJECT DESCRIPTION

This Chapter will describe the proposed mining project, including the mining process, the mineral separation and processing plants, the transportation of materials between the mine site and, the port, the loading of vessels, and infrastructural requirements for water and power. The production of heavy minerals at the project site is contextualised in terms of the global market for these commodities.

CHAPTER 5: DESCRIPTION OF THE BIOPHYSICAL ENVIRONMENT

This Chapter will describe the biophysical environment of the proposed development site.

CHAPTER 6: DESCRIPTION OF THE SOCIAL ENVIRONMENT

This Chapter will describe the socio-economic environment of the proposed development site.

CHAPTER 7: PUBLIC PARTICIPATION PROCESS

This Chapter will provide details of the public participation process conducted in terms of regulation (31) sub-regulation (1) including:

- Steps undertaken in accordance with the Plan of Study (PoS);
- ✤ A list of all persons, organisations and organs of state that were identified and registered as I&APs in relation to the application.
- A summary of the comments received from, and a summary of the issues raised by registered I&APs (as part of the Issues and Response Trail), the date of receipt of these comments and the response of the EAP to those comments; and
- Copies of any representations, objections and comments received from registered I&APs.

CHAPTER 8: KEY FINDINGS OF THE SPECIALIST STUDIES

This Chapter will provide a summary of the findings of the specialist studies undertaken for the project.

CHAPTER 9: METHODOLOGY FOR ASSESSING IMPACTS

This Chapter will provide an indication of the methodology used in determining the significance of potential environmental and social impacts.

CHAPTER 10: ASSESSMENT OF BIOPHYSICAL IMPACTS

This Chapter will provide a description of all environmental issues relating to all phases of the proposed development that were identified during the EIA process, an assessment of the significance of each issue and an indication of the extent to which the issue could be addressed by the adoption of mitigation measures.

CHAPTER 11: ASSESSMENT OF SOCIO-ECONOMIC IMPACTS

This Chapter will provide a description of all socio-economic issues relating to all phases of the proposed development that were identified during the EIA process, an assessment of the significance of each issue and an indication of the extent to which the issue could be addressed by the adoption of mitigation measures.

CHAPTER 12: ASSESSMENT OF WASTE AND PROCESS RELATED ISSUES

This Chapter will provide a description of all waste related issues relating to all phases of the proposed development that were identified during the EIA process, an assessment of the significance of each issue and an indication of the extent to which the issue could be addressed by the adoption of mitigation measures.

CHAPTER 13: THE EFFECTS OF THE KAMIESBERG PROJECT ON GLOBAL CLIMATE CHANGE

This Chapter will provide an overview of the potential effects of the Kamiesberg Project on global climate change.

CHAPTER 14: ALTERNATIVES

This Chapter will provide a description of the alternatives to the proposed development or parts of the proposed development. It also includes a comparative assessment of viable alternatives.

CHAPTER 15: ENVIRONMENTAL MANAGEMENT PROGRAMME

This Chapter will provide a draft Environmental Management Programme for the proposed Kamiesberg Project.

CHAPTER 16: MONITORING PROGRAMME

This Chapter will provide a Monitoring Programme for the proposed Kamiesberg Project.

CHAPTER 17: DECOMMISSIONING AND CLOSURE PLAN

This Chapter will provide a Decommissioning and Closure Plan for the proposed Kamiesberg Project.

CHAPTER 18: CONCLUSIONS AND RECOMMENDATIONS

This Chapter will present a synthesis of the project after all mitigation and compensation measures have been applied, detailing the residual impacts.

SPECIALIST STUDIES

The following specialist studies are proposed for the EIA phase of the proposed development:

- Vegetation Assessment
- Biodiversity and Faunal Assessment
- Soils and Agricultural Assessment
- Ground and Surface Water Assessment
- Heritage, Archaeological and Paleontological Impact Assessment
- Rehabilitation Assessment
- Socio-economic Impact Assessment
- Scoping Level Health Impact Assessment
- Visual Impact Assessment
- Air Quality Assessment
- Baseline Radiation Assessment
- Waste Management Study

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• Materials Handling, Transport and related Infrastructure Assessment

Please note: A Marine Study will be undertaken if the single point mooring option becomes the preferred option for the proposed development. Should this option be excluded during the EIA phase of the proposed project no such study will be undertaken.

SPECIALIST STUDIES: DRAFT TERMS OF REFERENCE

Vegetation Assessment

Mining will result in the clearing of vegetation not only during the operational stage but also for the construction of associated infrastructure. Vegetation is an important aspect of the landscape and the ecological functioning of the area and provides important habitats for many faunal species particularly birds, insects and reptiles. Clearing the vegetation will, therefore, affect the ecological functioning of the area, as well as the faunal diversity. Removal of the vegetation will also create a habitat for the invasion of alien species. Consequently baseline data on the vegetation of the area is needed to assess impacts related to this loss of vegetation, and to facilitate rehabilitation. The specific terms of reference are as follows:

- To record the plant species that occur within the study area, based on field surveys.
- To identify, and locate where possible, any plant Species of Conservation (special) Concern, namely Threatened, Near Threatened, Rare (species with conservation status and which are endemic to the area).
- To comment on the conservation status of specific plant species (all SSC will be discussed in detail).
- To compile a broad-scale vegetation or habitat map of the area. This vegetation map should indicate the extent that mining activities would affect each vegetation or habitat type, such as the impacts on wetlands located in the concession area.
- To identify alien invasive species and the levels of infestation, with particular focus on rehabilitation that would reduce the significance of this impact.
- To work in consultation with other specialists to ensure that the linkages between the various systems are understood.
- To address all issues and concerns raised by I&APs during the scoping phase.
- To provide a sensitivity map of the study (concession and coastal) areas in order for the proponent to better place the layout of the project's infrastructure.
- Once a sensitivity map has been created, the specialist must suggest ecological corridors around or adjacent to the project area.
- Identify ecosystem services provided by the vegetation types in the project area.
- Identify and assess the environmental significance of the identified botanical impacts using the methodology prescribed by CES, as this methodology is compliant with international best practice in EIA.
- To provide practical and realistic recommendations to mitigate the identified botanical impacts

Biodiversity and Faunal Assessment

Mining requires the removal of extensive vegetation and habitat. It is important to assess the level of impact on biodiversity, and especially the faunal groups that make use of the habitats that will be lost as a result of mining. It is necessary to determine the baseline condition of the area to assess the impacts on faunal species arising through the further loss of habitat and food sources. Specific terms of reference include:

- Assess the conservation value of the various plant communities and ecological habitats in the area, in order to assess the significance of habitat loss on faunal groups as a result of the development.
- Define and map faunal habitats that are sensitive and require conservation. These may need to be defined as No-Go or Restricted Development areas.
- Review the mine path and compare it to the vegetation sensitivity maps. Any conflicts or areas that may be impacted will need to be noted and assessed
- Ensure that the study deals with the issues raised during scoping.
- Carry out a rapid survey to assess the diversity of amphibian, reptile, bird and mammal species in the area.
- Identify any rare or endangered faunal species that require consideration in the conservation programme.
- Describe the impacts of current land use, so that the potential impacts from the development on the natural environment can be understood in this context.
- Determine the impacts of the construction and operation of the proposed development on the faunal biodiversity in the area.
- The significance of the potential impacts and benefits must be assessed using the CES methodology (described in Appendix 1). Any predictions will need to include the confidence in the impacts occurring, and the significance of these impacts occurring on the local fauna.
- Provide recommendations and mitigation measures that will reduce negative impacts on the local ecology and optimise conservation benefits.

Soils and Agricultural Assessment

The overall objective of this study is to understand the existing soils and agricultural use and the impacts the proposed mining project would have on soils and agricultural use within the mining area. Specific terms of reference include:

- Provide, at a reconnaissance level, a soils map of the proposed mining area.
- Identify and comment on the different land use patterns within the concession.
- Evaluate the land capability/suitability of the area at a reconnaissance level and comment on the productive potential of the area for agriculture.
- Map existing land use, and align land use categories with the vegetation map.
- Identify the major impacts resulting from present agricultural practices.
- Identify and assess the significance of impacts on the soil and agricultural environments that could result from the project.
- Ensure that the study deals with any other issues related to land use raised during scoping.
- Assess the environmental significance of these impacts using the methodology prescribed by CES.

Ground and Surface Water Assessment

Although no dredge mining will take place, the wet separation process will involve the use of sea water. Tailings disposed into the mined-out pits will be saturated with sea water. In terms of water resources, use of groundwater during processing is not anticipated, however may be required for the washing of HMC prior to separation. The following issues need to be addressed:

• Ascertain the ecological state and functioning of the drainage network.

- Provide a basic characterisation of the water resources, including seasonal variations, based on existing information.
- Identify any environmental impacts on water resources that may result from the mining process.
- Determine the risks of polluting groundwater resources at the mine site.
- Address the impact that process water use may have on water supplies.
- Identify any other significant impacts that may result, either directly or indirectly through the mining process on water resources.
- Assess the significance of the impacts, and provide practical and realistic recommendations (from a cost perspective) to mitigate impacts
- Address all issues and concerns raised by interested and affected parties during the scoping stage, and reported on in the Scoping Report.

Heritage Impact Assessment

In terms of the Heritage Resources Management Act (No 25 of 1999) Section 38(1)) an assessment is required in case of:

- The construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
- The construction of a bridge or similar structure exceeding 50 m in length;
- Any development or other activity which will change the character of a site
 - Exceeding 5 000 m² in extent; or
 - Involving three or more existing erven or subdivisions thereof; or
 - Involving three or more erven or subdivisions thereof which have been consolidated within the past five years.
- The costs of which will exceed a sum set in terms of regulations by SAHRA or a
 provincial heritage resources authority;
- The re-zoning of a site exceeding 10 000m² in extent; or
- Any other category of development provided for in regulations by SAHRA or a provincial heritage resources authority.

Consequently, an in-depth Phase 1 Heritage Impact Assessment of the mining area and servitude is required, which must address the following:

- Provides an overview of relevant legislation;
- Describes the results of all site investigations;
- Determines the significance of heritage resources in terms of criteria defined in the methodology.
- Assesses the significance of these resources;
- Assesses impacts (including cumulative impacts) associated with all the stages of the project.

Rehabilitation Assessment

Rehabilitation is a key mitigation action to reduce many of the impacts on the natural environment. A study is therefore required to draw on baseline information that will be collected during baseline soil, vegetation and fauna studies to develop a practical rehabilitation strategy.

Initial studies are required to address the rehabilitation of the mining area using natural vegetation, as well as non-indigenous species that might be more useful in initial stages of sand stabilisation. This study will need, in the first instance, to develop a conceptual

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rehabilitation strategy for the mined-out area, paying particular attention to the technical feasibility and cost effectiveness of any strategy. Secondly, the study must report on the success of the rehabilitation that has been undertaken to date, and thirdly a detailed rehabilitation programme, including cost estimates and practical guidelines and specifications must be developed. This will need to be based on local experience, and especially the rehabilitation programme at the Namakwa Sands operation. The specific terms of reference for this study will be as follows:

- Define the objectives of a rehabilitation programme, including options for post-mining land use.
- Present conceptual rehabilitation strategies for the re-vegetation of the mined area, paying close attention to the technical feasibility and cost effectiveness of any rehabilitation strategy.
- Define topsoil depth, and provide recommendations on the storage of topsoil, spreading rates and other recommendations which could influence the mining operation, especially in terms of bulk earth works and material handling.
- Investigate the nature of the local plant communities to identify important plant species that could be used in the rehabilitation programme, and to understand successional pathways.
- Discuss the rehabilitation of soils in the mined out areas, and the limitations imposed by a loss of fine material and use of sea water in the process.
- Provide an overview of alternative rehabilitation strategies, with particular focus on the re-establishment of the natural ecosystem.
- Develop any rehabilitation strategies in consultation with relevant government departments and key stakeholders.
- Identify experimental studies needed to ensure the technical feasibility of the suggested rehabilitation programme.
- Investigate ways of initially stabilising the sand surface through the use of a layer of clay, possibly bio-crusts or conventional techniques such as brush wood packing and wind row establishment, to determine the best option(s).

Socio-economic Impact Assessment

The project will result in national, regional and local economic benefits. It could also provide support for infrastructural development and, at a local level, will provide job opportunities and benefits arising from the multiplier effects associated with these. The primary objectives of this study will be:

- To provide a detailed description of the socio-economic environment in and around the project area.
- Analyse the potential impacts of the proposed project.
- Provide guidelines for limiting or mitigating negative impacts and optimising benefits, taking into account the experience at the original project to date.

The specific terms of reference are as follows:

- Describe the local socio-economic environment, and undertake the required surveys to quantify the number of households (and people) that will be directly affected as a result of the project.
- Ensure that the study deals with the issues raised during scoping.
- Assess the significance of potential economic and social impacts and benefits on the local populace and the Local and District Municipality.
- Assess the local social infrastructure (health, education, markets, community);

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- Describe the formal and informal governing structures;
- Identify the division of gender tasks and other relevant gender issues;
- Identify income and expenditure trends;
- Describe landownership and property rights;
- Quantify the direct and indirect economic benefits of the project at local, regional and national levels. As an option, consider using economic models that could quantify direct and indirect economic benefits, as well as backward and forward linkages, multiplier effects and real benefits that might arise from employment opportunities.
- Identify project-related impacts and provide recommendations for mitigating negative impacts and optimising positive impacts.

Scoping Level Health Impact Assessment

Community and public health is increasingly regarded as an important consideration when evaluating project developments. Health and well-being is regarded as a basic need and is recognised as a fundamental human right. Health effects can influence projects from many directions and need to be considered in all phases of the project life cycle.

Project developments are increasingly evaluated based on environmental and social safeguards. The IFC Performance Standards are generally used as best practice guidelines. Performance Standard 4 addresses community health and safety, and the IFC has supported the methodology of Health Impact Assessment (HIA) to support this element. A Good Practice Note supports this methodology, and should be applied as a consistent and best practice approach. The specific terms of reference are as follows:

- Develop a profile of potentially affected communities and impact areas of concern. This will be completed in conjunction with the social assessments.
- Analyze environmental health areas that include health determinants and health outcome, and incorporate both health impacts and health needs. This is the preferred International Finance Corporation (IFC) methodology, which has been adopted to ensure a systematic method is used.
- Identify relevant data gaps that may exist in the baseline data. This phase will allow the clear terms of reference to be determined for the comprehensive health impact assessment and future development of the community health management plan, if required.
- Identify key stakeholders and develop a key stakeholder forum to support the development of the management plan in the next phase.
- Highlight key potential health impacts and opportunities that need to be addressed in the next phase, divided into community, project and institutional risk factors.
- Determine what additional project specific data needs to be collected. An integrated approach must be adopted, in which health data collection will be incorporated as part of the social impact assessments.
- At this stage the health assessment need not include specific quantitative baseline data collection, as this will be informed by the results of scoping study.
- Use qualitative data to undertake an impact assessment.
- Provide the project with pre-execution advice on how project activities, design, or plans may be changed, modified, or adapted in order to avoid or mitigate negative impacts and enhance anticipated benefits.

Visual Impact Assessment

The overall aim of a Visual Impact Assessment (VIA) is to determine the current landscape quality (scenic views, visual sensitivity) and the visual impact of the proposed development. The terms of reference of the VIA will include the following tasks:

- Undertake a desktop survey using 1:50 000 survey maps, 1:10 000 orthophotos, any digital colour aerial photography and any other high resolution images.
- Conduct a site reconnaissance visit and photographic survey of the proposed project site. The focus of this survey should be on natural and cultural features, protected areas, coastal views and landscape, view sites, and scenic routes.
- Conduct a desk top mapping exercise and develop a Digital Elevation Model to establish visual sensitivity:-
 - Describe and rate the scenic character and sense of place of the area and site.
 - Establish extent of visibility by mapping the view-sheds and zones of visual influence.
 - Establish visual exposure to viewpoints.
 - Establish the inherent visual sensitivity and visual absorption capacity of the site by mapping slope grades, landforms, vegetation, special features and land use and overlaying all relevant map layers to assimilate a visual sensitivity map.
- Review relevant legislation, policies, guidelines and standards.
- Preparation of a Visual Baseline/Sensitivity report which shall include, inter alia:
 - Assessing visual sensitivity criteria such as extent of visibility, the sites inherent sensitivity, visual sensitivity of the receptor's, visual absorption capacity of the area and visual intrusion on the character of the area.
 - Prepare photomontages of the proposed development.
 - Assess the proposed project against the visual impact criteria (visibility, visual exposure, sensitivity of site and receptor, visual absorption capacity and visual intrusion) for the site.
 - Assess impacts based on a synthesis of criteria for each site (criteria = nature of impact, extent, duration, intensity, probability and significance).
 - Establish mitigation measures/recommendations with regards to minimizing visual impacts.

Air Quality Assessment

The MSP has the potential to result air pollution within the vicinity of the plant, in terms of the release of CO_2 and the possible release of NO_x from the MSP. Dust generation is a potential impact on community and worker health due to elevated concentrations of respirable dust (PM 10's) which may exceed US-EPA standards, especially along both roads and the cleared mining area. Dust generated from Monazite handling and stockpiles presents an occupational health and safety risk to workers. In light of this, and the sensitivities around GHG emissions, the specific terms of reference are as follows:

- Assess the current levels of air pollution (including dust) and characterise current air quality.
- Identify other risk sources of air pollution from the project, especially dust from mining activities and vehicle entrainment.
- Quantify all particulate emissions using local meteorological data, and the proposed throughput for the operational phase of the MSP.
- Predict, using suitable dispersion modelling or other appropriate methodologies, the air concentrations and emissions fallout due to each of the identified sources.
- Quantify all emissions arising from the plant and transport of materials and products.
- Assess what the impact of the project will be on ambient air quality. This will mean determining increased levels of pollution in the area and ranking them in terms of severity, frequency, locality and impact on the receiving environment.

- Assess impacts of emissions from the MSP.
- Ensure that the study deals with the issues raised during scoping.
- Assess the environmental significance of these impacts.
- Review IFC General EHS Guidelines section 1.1 (April 2007) and provide recommendations to ensure emissions comply with those presented in Tables 1.1.1 and 1.1.2.
- Suggest ways to avoid, mitigate, or ameliorate the impacts by discussing modifications or improvements to the process design with production engineers.
- Develop a monitoring programme to ensure effective implementation of the recommended mitigation measures.

Baseline Radiation Assessment

The purpose of the study is to examine the radiological aspects of the project, since all heavy mineral ore bodies contain minerals enhanced in uranium and thorium, which become concentrated and extracted during mining and processing. In addition, a variety of waste streams with minerals containing uranium and thorium will be produced. The presence of uranium and thorium in the products and wastes streams from the project could result in the exposure of workers to ionising radiation, and a study is required to investigate levels of U and Th in the deposit, and to provide industry standard recommendations to manage these levels. The specific terms of reference are as follows:

- Provide an overview of background radiation sources and exposure.
- Provide an overview of naturally occurring radioactive materials in the mining and processing of heavy minerals.
- Provide an overview of the international system of dose limitation recommended by the ICRP and IAEA.
- Provide a brief review of the safety standards and guideline documents on the mining of NORM and TENORM materials produced by the IAEA and other industry specific agencies.
- Make recommendations regarding the components and methodology of a field based baseline radiation and dust survey at the project site.
- Provide a summary of the currently available information on the radiological characteristics of the ore body.
- Summarise the currently available information on the background gamma radiation levels at the ore body and compare these to world norms. Provide comment on any aspects that require further investigation and data.
- Identify the potential radiological exposure pathways to both workers and the public which may result from the proposed mining and processing activities.
- Investigate exposure to non-ionizing radiation and provide recommendations to ensure compliance with IFC General EHS Standards.
- Provide an overview of the components of the radiological protection programs that will be required during the mining and minerals processing operations.
- Provide recommendations regarding the engineered controls that can be used in the plant design to keep doses as low as reasonably achievable, by review design controls to ensure they are correct.
- Provide recommendations regarding the administrative controls that can be used during operations to keep doses as low as reasonably achievable.
- As the MSP will require a Certificate of Registration (COR) from the national Nuclear Regulator (NNR), undertake a hazard assessment for various stages of the project.
- Identify and describe the anticipated negative and positive radiological impacts during the construction, operation, decommissioning and mine closure phases.

- Describe how the negative issues and impacts should be managed and incorporated into engineering and administrative specifications for the mine, by for example recommending that NORM material is buried in the pit.
- Provide recommendations to manage occupational health and safety aspects associated with the operation.

Waste Management Study

This study will focus on the environmental impacts that may arise from the handling, storage and disposal of solid and liquid wastes from the mining and mineral processing activities and ancillary facilities. It will need to identify the various waste streams, and make recommendations on how to handle the additional waste streams. The specific terms of reference are as follows:

- Compile an inventory (identify, describe and, where possible, quantify) the various waste streams to be generated by sources. This will not require the analysis of solid waste samples.
- Briefly describe the processes giving rise to the waste streams and the volumes and tonnages of waste streams.
- Identify and describe the possible impacts of any solid and liquid wastes on the quality of surface and groundwater.
- Assess the environmental significance of these impacts using the methodology prescribed by CES.
- Assess the risks to the health and safety of workers at the various operations and related works and residents within the project's area of influence.
- Provide recommendations on the most feasible options for the disposal of solid and liquid wastes.
- Describe the levels of hazardous waste on-site, paying particular attention to any material that might be regarded as radioactive, and make recommendations for the disposal and/or recycling of these materials.
- Relate levels of any potentially toxic waste to recognised international standards, and ensure that any waste management strategy is in line with these standards.
- Provide recommendations on ways in which Green House Gas emissions can be avoided or reduced, to be compliant with IFC requirements.
- Ensure that the study deals with the issues raised during scoping.

Materials Handling, Transport and related Infrastructure Assessment

The purpose of this study is to assess the potential impacts on existing local road and related infrastructure, and on public safety, of traffic generated by the mining operation, both during the construction and operational phases. Special attention will be paid to issues arising from the expected increase in regular traffic between the operation and Bitterfontein, as well as issues related to the establishment of a servitude to Khnyp Punt.

OPTIONAL SPECIALIST STUDY: DRAFT TERMS OF REFERENCE

The proposed single point mooring and the marine pipeline option both have the potential to negatively impact on the marine environment. The specific terms of reference for this study are as follows:

• Determine, through the use of underwater visual surveys, what biota exists under the single point mooring and pipeline pathway.

- Describe and rank the importance of the biota that exists under the single point mooring and pipeline pathway.
- Develop a map that describes areas of high, medium and low sensitivity (if appropriate) to be used as a guide for the final placement of the single point mooring and pipeline.
- Ascertain whether any infrastructure, transhipment or increased marine traffic impacts are likely to be of concern on the marine environment.

ASSESSMENT METHODOLOGY

Evaluating the significance of impacts

To ensure a direct comparison between various specialist studies, a standard rating scale has been defined and will be used to assess and quantify the identified impacts. This is necessary since impacts have a number of parameters that need to be assessed. Five factors need to be considered when assessing the significance of impacts, namely:

Relationship of the impact to temporal scales - the temporal scale defines the significance of the impact at various time scales, as an indication of the duration of the impact.

Relationship of the impact to spatial scales - the spatial scale defines the physical extent of the impact.

The severity of the impact - the severity/beneficial scale is used in order to scientifically evaluate how severe negative impacts would be, or how beneficial positive impacts would be on a particular affected system (for ecological impacts) or a particular affected party. The severity of impacts can be evaluated with and without mitigation in order to demonstrate how serious the impact is when nothing is done about it. The word 'mitigation' means not just 'compensation', but also the ideas of containment and remedy. For beneficial impacts, optimization means anything that can enhance the benefits. However, mitigation or optimization must be practical, technically feasible and economically viable.

The likelihood of the impact occurring - the likelihood of impacts taking place as a result of project actions differs between potential impacts. There is no doubt that some impacts would occur (e.g. loss of vegetation), but other impacts are not as likely to occur (e.g. vehicle accident), and may or may not result from the proposed development. Although some impacts may have a severe effect, the likelihood of them occurring may affect their overall significance.

Each criterion is ranked with scores assigned as presented in Table A1 to determine the overall **significance** of an activity. The criterion is then considered in two categories, viz. effect of the activity and the likelihood of the impact. The total scores recorded for the effect and likelihood are then read off the matrix presented in Table A2, to determine the overall significance of the impact (Table A3). The overall significance is either negative or positive. The **environmental significance** scale is an attempt to evaluate the importance of a particular impact. This evaluation needs to be undertaken in the relevant context, as an impact can either be ecological or social, or both. The evaluation of the significance of an impact relies heavily on the values of the person making the judgment. For this reason, impacts of especially a social nature need to reflect the values of the affected society.

Negative impacts that are ranked as being of "VERY HIGH" and "HIGH" significance will be investigated further to determine how the impact can be minimised or what alternative activities or mitigation measures can be implemented. These impacts may also assist decision makers i.e. lots of HIGH negative impacts may bring about a negative decision.

For impacts identified as having a negative impact of "**MODERATE**" significance, it is standard practice to investigate alternate activities and/or mitigation measures. The most effective and practical mitigations measures will then be proposed.

For impacts ranked as "**LOW**" significance, no investigations or alternatives will be considered. Possible management measures will be investigated to ensure that the impacts remain of low significance.

The significance scale is an attempt to evaluate the importance of a particular impact. This evaluation needs to be undertaken in the relevant context, as an impact can either be ecological or social, or both. The evaluation of the significance of an impact relies heavily on the values of the person making the judgment. For this reason, impacts of a social nature need to reflect the values of the affected society.

Cumulative Impacts

Cumulative Impacts affect the significance ranking of an impact because it considers the impact in terms of both on-site and off-site sources. For example, pollution making its way into a river from a development may be within acceptable national standards. Activities in the surrounding area may also create pollution which does not exceed these standards. However, if both on-site and off-site activities take place simultaneously, the total pollution level at may exceed the standards. For this reason it is important to consider impacts in terms of their cumulative nature.

Seasonality

Although seasonality is not considered in the ranking of the significance, if may influence the evaluation during various times of year. As seasonality will only influence certain impacts, it will only be considered for these, with management measures being imposed accordingly (i.e. dust suppression measures being implemented during the dry season).

Table A1:	Ranking	of Evaluation	Criteria
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	Temporal scale			Score				
	Short term	Less than 5 years						
	Medium term	Between 5 and 20 years						
	Long torm	Between 20 and 40 years	(a generation) and from a					
	Long term	human perspective almost p	permanent.					
	Permanent	Over 40 years and resulting	in a permanent and lasting					
	Fermanent	change that will always be the	here					
	Spatial Scale							
	Localised	At localised scale and a few	hectares in extent					
	Study area	The proposed site and its im	mediate environs					
	Regional	District and Provincial level						
Шн	National	Country						
ШÖ	International Internationally							
	Severity		Benefit					
	Slight / Slightly	Slight impacts on the	Slightly beneficial to the					
	Beneficial	affected system(s) or	affected system(s) or					
		party(ies)	party(ies)					
	Moderate /	Moderate impacts on the	An impact of real benefit					
	Moderately	affected system(s) or	to the affected system(s)					
	Beneficial	party(ies)	or party(ies)					
	Severe / Beneficial	Severe impacts on the	A substantial benefit to the					
		affected system(s) or	affected system(s) or					
		party(ies)	party(ies)					
	Very Severe / Very	Very severe change to the	A very substantial benefit					
	Beneficial	affected system(s) or	to the affected system(s)					
		party(ies)	or party(ies)					
	Likelihood	1						
0	Unlikely	The likelihood of these impa	icts occurring is slight					
HO	May Occur	The likelihood of these impa	cts occurring is possible					
LIKELIH	Probable	The likelihood of these impa	cts occurring is probable					
	Definite	The likelihood is that this im	The likelihood is that this impact will definitely occur					

Table A2: Th	e matrix	that	will	be	used	for	the	impacts	and	their	likelihood o	of
occurrence												

				Effect												
tain	2		3	4	5	6	7	8	9	10	11	12	13	14	15	16
it n	• •	1	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Ce		2	5	6	7	8	9	10	11	12	13	14	15	16	17	18
ul *		3	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	`	4	7	8	9	10	11	12	13	14	15	16	17	18	19	20

Table A3: Ranking	a matrix to	provide an	Environmental S	Significance
				Signinounoc

	Environmental Significance	Positive	Negative
LOW	An acceptable impact for which mitigation is desirable but not essential. The impact by itself is insufficient even in combination with other low impacts to prevent development. These impacts will result in either positive or negative medium to short term effects on the social and/or natural environment		4-7
MODERATE	An important impact which requires mitigation. The impact is insufficient by itself to prevent the implementation of the project but which, in conjunction with other impacts may prevent its implementation. These impacts will usually result in either positive or negative medium to long term effect on the social and/or natural environment.	8-11	8-11
HIGH	A serious impact which, if not mitigated, may prevent the implementation of the project. These impacts would be considered by society as constituting a major and usually long term change to the natural and/or social environment and result in severe negative or beneficial effects.	12-15	12-15
VERY HIGH	A very serious impact which may be sufficient by itself to prevent the implementation of the project. The impact may result in permanent change. Very often these impacts are unmitigable and usually result in very severe effects or very beneficial effects.	16-20	16-20

Example of an environmental significance statement

Impact 1: Impact of noise on human health

Cause and Comment

The noise associated with Heavy Goods Vehicles (HGVs) has the potential to impact on human health. A recommendation for the movement of large vehicles at night may impact on the sleep patterns of local communities.

Mitigation and Management

There are standard mitigation measures to ensure that vehicle noise is kept within acceptable limits. Vehicles should be kept in good repair; they should use standard exhaust and silencing equipment. Drivers should stick to designated speed limits. Roads should be kept in good condition.

Significance Statement

9		Tempora Scale	al	Spatial Sc	ale	Severity of Impact	of	Risk o Likeliho		Total
RATING	Without Mitigation	Short term	1	Localised	1	Moderate	2	Definite	4	8
-	With Mitigation	Short term	1	Localised	1	Slight	1	Unlikely	1	4
Ove	Overall Significance without mitigation									MODERATE
										-
Ove	rall Signific	ance with mi	tigati	on						LOW -

Mitigation Measures and Recommendations

Critical to any EIA is the recommendation of practical and reasonable mitigation measures and recommendations. These recommendations relate to the actions that are needed in order to avoid, minimise or offset any negative impacts from the development

Environmental Authorisation and Appeals Process

On thorough examination of the EIR, the competent authority will issue an Environmental Authorisation or reject the application. Should authorisation be granted, it will carry Conditions of Approval. The proponent is obliged to adhere to these conditions.

I&APs are notified of the decision and have 10 days in which to lodge a notice of intention to appeal the decision, and a further 30 days in which to submit the appeal.

APPENDIX B: CURRICULUM VITAE OF EAP

DR ANTHONY MARK (TED) AVIS

Date of Birth: 26 September 1960

QUALIFICATIONS

BSc (Hons), PhD (Rhodes)

DISSERTATION

Coastal Dune Ecology and Management in the Eastern Cape

ASSOCIATIONS

- Royal Society of South Africa
- Visiting Fellow; Department of Environmental Science; Rhodes University
- Certified Environmental Assessment Practitioner
- Botanical Society of South Africa
- South African Association of Botanists (SAAB)
- South African Council for Natural Scientific Professionals
- South African Institute of Ecologists and Environmental Scientists
- International Association of Impact Assessment

PROFESSIONAL EXPERIENCE

1998 – present: Full-time Managing Director of Coastal & Environmental Services, with 35 staff.

1989 – 1997: Lecturer and Senior Lecturer in Plant Ecology at Rhodes University.

Private environmental consultant as partner of Coastal & Environmental Services (CES, established January 1990), with expertise in EIAs and IEM procedure.

1987 – 1988: Ecological Consultant with Loxton Venn and Associates, responsible for vegetation, soils and land surveys; veld conditions assessments and EIAs.

1983 – 1987: Full time research in ecology, including coastal management studies and Environmental Impacts Assessments (EIAs).

NOTED ACHIEVEMENTS

- Publication of three manuscripts in refereed journals from research undertaken whilst an undergraduate student.
- Involvement as a principal consultant and coordinator of all specialist studies undertaken as part of the St Lucia EIA, being the youngest member of a team of 30 scientists involved in this project.
- Awarded the South African Association of Botanists Junior Medal. This honour and distinction is awarded to the candidate with the best PhD thesis in Botany for the particular year under review (1993).

Consulting experience

I have consulted in Botswana, Egypt, Kenya, Lesotho, Madagascar, Malawi, Mozambique, Namibia and South Africa. Environmental consulting experience, in no particular order, includes:

Environmental Impact Assessment

- 1. Principal consultant for the specialist studies for the Environmental Impact Assessments of proposed dune mining on the Eastern Shores of Lake St Lucia.
- Overall responsibility as EIA project manager for all environmental aspects of Billiton's TiGen mineral sand mining operations in Mozambique, to produce an EIA that meets international standards.
- 3. EIA project manager for the Corridor Sands mineral sand mining project in southern

Mozambique, to produce four EIAs to World Bank standards for the project's bankable feasibility study. EIAs produced for the mine site and smelter, the 400Kv power line, the 87km rail route and a bulk cargo facility at Matola Port. All these EIAs included the preparation of Environmental Management Plans.

- 4. EIA project manager for Tiomin Resources Inc (Toronto, Canada) for their Kwale mineral sands project in southern Kenya. Responsible for producing all six volumes of the EIA, regarded as the most comprehensive in Kenya to date.
- 5. EIA project manager for the EIA to support the rezoning of land to special purposes for the establishment of the Coega Industrial Development Zone (IDZ).
- 6. EIA project manager for the EIA to support the rezoning of land to special purposes for the establishment of the East London IDZ.
- 7. Numerous small-scale Scoping Reports as part of the Environmental Impact Assessment Process and in accordance with the requirements of the Environmental Conservation Act.
- 8. Pre-feasibility Environmental Impact Assessments, including one for BHP's mineral sand mining project in northern Mozambique, and similar projects in south-west Madagascar and Mozambique.
- 9. Study leader for a comprehensive EIA for a World Bank funded 400Kv power line in Malawi.
- 10.EIA for a dedicated haul road, material handling facility and jetty near Praia de Xai Xai, Mozambique for WMC Resources, Australia.
- 11.EIA Project Manager for the Nuclear Materials Authority of Egypt, to prepare the EIA as part of the Downer EDI Feasibility Study Team. (2007). EIA for a large scale resort development, including two golf courses and three hotels in the Eastern Cape, South Africa. (Ongoing).
- 12.EIA for the Madiba Bay resort development, incorporating the development of various portions of land within a 5000 hectare site for a range of resort type facilities. (2005 2008).
- 13. Study Leader for an EIA for a large heavy mineral mining project in South West Madagascar for Exxaro. (2006 2008).
- 14. Study Leader for an EIA for a proposed heavy mineral mine on the shores of Lake Malawi near Chipoka. (2005 2006).

Policy and strategic assessments

- 1. The development of the Eastern Cape Coastal Management Plan, to be adopted as policy by the Eastern Cape Government
- Study leader for the preparation of a State of Environment Report, and Environmental Implementation Plan for the Amatole District Municipality, covering an area of approximately 25 000 km².
- 3. Reports on ecological assessments of the damage caused to the environment by alleged illegal developments along the former Transkei coastline.
- 4. An initial Strategic Assessment of the Wild Coast spatial development initiative.
- 5. Study leader and project manager for the preparation of a World Bank/Global Environmental Facility funded geographic Strategic Environmental Assessment of the proposed greater Addo Elephant National Park, Eastern Cape, South Africa.
- 6. Strategic Environmental Overview of proposed mineral sand mine on the shores of Lake Malawi, Malawi.
- 7. A Strategic Environmental Assessment of four land use options in the Centane district of the Wild Coast.
- SEA covering an area half the size of the Eastern Cape (former Transkei) identify where a forestation projects could be implemented on a sustainable basis for poverty alleviation. Prepared for the Department of Water Affairs and Forestry. (2006 – 2007).
- 9. Integrated Coastal Zone Management Plan for the Buffalo City Municipality, Eastern Cape South Africa, including numerous Management Plans for estuaries, beaches etc. (2006 2007).
- 10. A Sustainability Analysis of various land use alternatives to determine optimum land use for the future rehabilitation of lease areas at Richards Bay Minerals. (2006).
- 11. State of Environmental Report and Environmental Management System for the Ukhulambe District Municipality. (2005).

Ecological

- 1. Ecological impact assessment for a proposed Zinc and Phosphoric Acid plant in the Eastern Cape.
- 2. Ecological specialist reports for the Coega Industrial Development Zone Strategic Environmental Assessment

- 3. Ecological impact assessment of proposed 800km Wild Coast N2 Toll Road, Eastern Cape.
- 4. Study leader for the ecological impact assessment of the Wild Coast Toll Road EIA, Eastern Cape and Kwazulu/Natal, South Africa.
- 5. Study Leader for Baseline Ecological Surveys of coastal lease areas in southern Mozambique for Rio Tinto exploration.
- 6. Pre-feasibility Ecological Survey of the Skeleton Coast to identify critical impacts linked to Diamond and Mineral Mining exploration.

Environmental Management

- 1. Project manager for a five-year rehabilitation programme of Samancor's Chemfos mine on the West Coast.
- Development of an Open Space Management Plan for the Coega Industrial Development Zone (IDZ), including the demarcation of open spaces, formulation of uses within the open space, integration with MOSS principles and developing guidelines and a business plan for the management of the open space system.
- 3. Preparation of numerous Environmental Management Programme Reports, in terms of the Minerals Act, for quarry operations in the Eastern Cape, including EMPRs for both the Eastern and Western Coega Kops.
- 4. Study Leader for the development of two detailed and definitive Environmental Management Plans for the construction of two large bridges across rivers in the Wild Coast, as part of the Wild Coast N2 Toll Road Project, for South African National Roads Agency Limited. (2006).
- Joint Study Leader for the development of numerous Construction and Operational Phase Environmental and Social Management Plans for Tiomin's proposed Kwale mineral mine in Kenya.

Other

- 1. A position paper on the current ecological knowledge of the Eastern Cape Provincial Coastline: implications for planning and research.
- 2. Environmental training and teaching for a number of professional short courses, and at undergraduate and postgraduate level at Rhodes University.
- **3.** Presented 29 conference papers and published 19 scientific articles in peer reviewed scientific journals.

APPENDIX C: LETTER FROM DEA CONFIRMING COMPETENT AUTHORITY

▲ .



environmental affairs

Department: Environmental Affairs REPUBLIC OF SOUTH AFRICA

Private Bag X 447· PRETORIA · 0001· Fedsure Building · 315 Pretorius Streat · PRETORIA Tel (+ 27 12) 310 3911 · Fax (+ 2712) 322 2682 DEA Reference: 14/12/16/3/1/2 Enquíries: Nonhlahla MkhWänazi Tel: 012 395 1745 Fax: 012 320 7539 Email: Nmkhwanazi@environment.gov.za

Dr Chantel Bezuidenhout Coastal & Environmental Services PO Box 934 GRAHAMSTOWN 6140

Fax: 046 622 6564 Tel: 046 622 2364

. 2013 -10- 1 4

PER FACSIMILE / MAIL

Dear Dr Bezuidenhout

IDENTIFYING OF COMPETENT AUTHORITY IN TERMS OF SECTION 24C OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO 107 OF 1998) ("NEMA"): PROPOSED HEAVY MINERAL (TITANIUM) MINING OPERATION AND ASSOCIATED INFRASTRUCTURE IN THE NORTHERN CAPE PROVINCE

Your e-mail, dated 3 October 2013, requesting confirmation that the competent environmental authority for the proposed heavy mineral (titanium) mining operation and associated infrastructure will be the Northern Cape Province Department of Environmental Affairs and Nature Conservation, has reference.

Based on information provided in your e-mail, the listed activities triggered by the application are located within the Northern Cape Province only, even though the Western Cape Province may be affected by increased traffic on the N7/ Provincial roads, and increased shipping traffic at the port.

Based on the information provided by you, the Department is of the opinion that the Minister is not the identified as the competent authority in terms of subsection 2(c) of 24C of NEMA, as the proposed development does not have a development footprint that falls within the boundaries of more than one province.

However, if your proposed development falls within any of the remaining categories of Section 24 C (2) of NEMA, then the Minister is the competent authority and as such, an application for authorisation must be submitted to this Department and authorisation obtained before such activities may commence

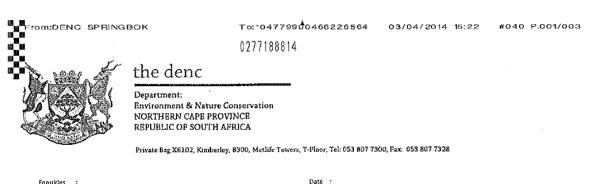
This Department reserves the right to revise or withdraw comments or request further information from you based on availability of new information.

Medowa ŝ

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Mr Ishaam Abader Deputy Director-General: Legal, Authorisations, Compliance and Enforcement Department of Environmental Affairs Letter signed by: Milicent Solomons Designation: Director: Integrated Environmental Authorisations Date: 110203

APPENDIX D: LETTER FROM DENC APPROVING SCOPING REPORT



Dipatilsilo Navrae Imibuzo	:	O, Ndzumo	Letha: Datum: Umhla:	03 April 2014
Reference	;	NCP/EIA/0000249/2013		

Tshupelo : Verwysing : Isalathiso : NC/EIA/17/0000249/2013

Att: Ted Avis

Coastal and Environmental Services 67 African Street Grahamstown 6140

Fax no: 046 622 6564

Email: t.avis@cesnet.co.za

Dear Sir

APPLICATION FOR ENVIRONMENTAL AUTHORISATION: GNR 544: ACTIVITIES: 2, 9, 11, 14, 15, 16, 18, 22, 23, 24, 26, 47 & GNR 545: ACTIVITIES: 3, 14, 15, 20, 24 & GN. R546: ACTIVITIES: 4, 8, 12, 13, 14 AND 16: KAMIESBERG HEAVY MINERAL MINING PROJECT, ROODE HEUWEL (6100 HA), LEEUVLEI (3900 HA) AND SABIES (8600 HA), GARIES, KAMIESBERG LOCAL MUNICIPALITY, NAMAKWA DISTRICT MUNICIPALITY, NORTHERN CAPE PROVINCE.

The scoping report for environmental impact assessment which was submitted by you in respect of the abovementioned application and received by the Department on 03rd February 2014 has been accepted by the Department. You may accordingly proceed with undertaking the environmental impact assessment in accordance with the tasks that are outlined in the plan of study for environmental impact assessment.

Please also take note of the following comments that must be addressed in the EIA report:

- A correction must be made on Provincial Nature Conservation Ordinance 16 Of 1974, to Provincial Nature Conservation Ordinance 19 Of 1974,
- The Provincial Nature Conservation Ordinance 19 Of 1974 was repealed by the Northern Cape Nature Conservation Act 9 of 2009, this act musts form part of the Environmental Legislations, PSSC and must also form part of the conservation body list, you must also obtain the status of species found in the project area from NCNC Act 9 of 2009.

From:DENC SPRINGBOK

To: 04779900466226564 03/04/2014 15:23 #040 P.002/003

- Department of Environment and Nature Conservation should be corrected to DENC not DNEC in Page 86 in the list of stakeholders.
- The Aquatic Critical Biodiversity Map in the Namakwa Biodiversity Sector Plan must be consulted as it shows Groenrivier mouth as a CBA1 area (highest importance) and the river section on the activity(s) southern boarder as CBA2 (high importance). The Groenrivier mouth is part of coordinated water bird count of UCT's Avian Demography Unit, with species such as Damara Tern(Critically Endangered) ,Greater Flamingo (Near Threatened) and Lesser Flamingo (Near Threatened) having been observed in the mouth lagoon (cwa.adu.org.za). Although the Groenrivier mouth is not situated within the proposed mine boundaries but it is threatened by nearby, upstream and mining impacts.
- The EIA must address how impacts on the river and the mouth will be avoided or mitigated. And must also
 address the strict mitigation measures on the protection of the Kamiesberg wetlands.
- A comprehensive survey of terrestrial bird species must be conducted in the terrestrial habitat of the
 proposed activity as well as aquatic habitats of wetland and adjacent river systems. And a similar survey
 must be conducted for amphibians and reptiles.
- The possible impacts of the proposed activity on SANParks protected area expansion plans must be discussed with SANParks.
- The list of conservation and planning tools that will be considered must also include the Northern Cape Spatial Development Framework, the ADUs coordinated Water bird Counts and SABAP datasets and the Leslie Hill Succulent Karoo Trust/World Wildlife Fund for Nature Priority Focus area for the conservation of the Succulent Karoo (Figure 5).
- The proposed mine has within its activity boundaries five national vegetation, the Namaqualand Riviere and Namaqualand Sand Fynbos will be most impacted by the proposed mine when contemplating farm boundaries. Approximately 2.4% (2 261 ha) of the Namaqualand Sand Fynbos is currently protected by Namaqua National Park in the north and south of the park (Figure 2). Suitable mitigation and management actions must be implemented to protect this vegetation unit.
- The Namaqua National Park authorities must be consulted in developing mitigation measures that will be
 effective in minimising the impacts in the Park.
- A comprehensive survey of the flora of the development site must be undertaken in the appropriate (autumn to spring) rainfall period.

From:DENC SPRINGBOK

To: 04779900466226564 03/04/2014 15:23 #040 P.003/003 0277188814

Please do not hesitate to call me on 027 718 8800 if you need any further information.

Yours Sincerely

Ms O. Ndzumo Environmental Officer Email:onyndzumo@gmail.com

cc: Henri Bonsa

Zirco Roode Heuwel (Pty) Ltd

P.O Box 6038

Uniedale

7612

APPENDIX E: INFORMATION REQUESTED BY DENC

A correction must be made on Provincial Nature Conservation Ordinance 16 of 1974, to Provincial Nature Conservation Ordinance 19 of 1974.

Noted and corrected.

The Provincial Nature Conservation Ordinance 19 of 1974 was repealed by the Northern Cape Nature Conservation Act of 2009, this Act must form part of the Environmental Legislation, PSSC and must also form part of the conservation body list, you must also obtain the status of species found in the project area from NCNC Act 9 of 2009.

The Northern Cape Nature Conservation Act, 2009 (Act No. 9 of 2009) is enacted by the Northern Cape Provincial Legislature and proclaimed in the Provincial Gazette to provide for the sustainable utilisation of wild animals, aquatic biota and plants in the Northern Cape; to provide for the implementation of the Convention of International Trade in Endangered Species of Wild Fauna and Flora (CITES) of which South Africa is a signatory; to provide for offences and penalties for contravention of the Act; to provide for the appointment of nature conservators to implement the provision of the Act; to provide for the issuing of permits and other authorisations; and to provide for all matters pertaining to the Act.

Updated specie lists can be found in Appendix H of this report.

Department of Environment and Nature Conservation should be corrected to DENC not DNEC in Page 86 in the list of stakeholders.

Noted and corrected.

The Aquatic Critical Biodiversity Map in the Namakwa Biodiversity Sector Plan must be consulted as it shows the Groen River mouth as a CBA1 area (highest importance) and the river section on the activity(s) southern border as CBA2 (high importance). The Groen River Mouth is part of coordinated water bird count of UCT's Avian Demography Unit, with species such as Damara Tern (Critically Endangered), Greater Flamingo (Near Threatened) and Lesser Flamingo (Near Threatened) having been observed in the mouth lagoon (cwa.adu.org.za). The Groen River mouth is not situated within the proposed mine boundaries but is threatened by nearby, upstream and mining impacts.

This aspect has been addressed and included in the Vegetation Assessment in Chapter 5, section 5.4.

The EIA must address how impacts on the river and the mouth will be avoided or mitigated and must also address the strict mitigation measures on the protection of the Kamiesberg wetlands.

This has been addressed in Chapter 9 of this report for the construction phase, operational phase (refer to section 9.1.2, 9.1.3 (iii), 9.1.4 (iii), 9.1.5). Cumulative impacts have also been addressed in the Surface and groundwater section and is described in chapter 9, section 9.5.1 as well as in Chapter 4, section 4.2.6.

A comprehensive survey of terrestrial bird species must be conducted in the terrestrial habitat of the proposed activity as well as aquatic habitats of wetland and adjacent river systems and a similar survey must be conducted for amphibians and reptiles.

Please refer to Chapter 2 Section 2.2 of the faunal report, which has been incorporated below for your convenience.

The known diversity of the terrestrial fauna in the project area was determined by a literature review. Species known from the region, or from adjacent regions whose preferred habitat(s) were known to occur within the study area, were also included. Literature sources included:

- Amphibians Channing (2011), Du Preez & Carruthers (2009), Frost (2012).
- Reptiles Branch (1998, 2008), Bates et al. (2013).
- Birds Hockey et al. (2005), Cohen et al. (2006), Sinclair et al. (2011), IUCN (2012).
- Mammals Apps (2000), Stuart & Stuart (2001), IUCN (2012).

Over and above the literature review, the field methods for compiling the species lists involved the following:

Amphibians and reptiles: Visual Encounter Survey method was used for amphibians and reptiles. Visual Encounter Surveys included active searching at day and night, D-netting for tadpoles, and acoustic surveys at night. In addition, an experienced herpetologist identified suitable habitats and searched for certain herpetofauna associated with those habitats.

Avifauna: The Visual Encounter Survey strategy was utilised for compiling the avifauna species list. Visual Encounter Surveys include the observations of scat, regurgitated pellets, nests, feathers, bird calls and birds in flight. Bird Point Counting was also utilised. A bird point count is done by an experienced observer who records all the birds seen and heard from a "point count station" over a selected period of time, in this case 20 minutes.

Medium to large sized mammals: "Scats, tracks and traces" observations for terrestrial vertebrates using observations along paths and when walking through the site. The recording of opportunistic sightings was also utilised. In addition, locals were interviewed about the presence or absence of mammals in the project area.

A comprehensive faunal species list is available in Appendix 1-4 of the faunal baseline assessment.

The possible impacts of the proposed acitivity on SANParks protected area expansion plans must be discussed with SANParks.

CES met with SANParks in the initial round of public participation in July 2013. SANParks was asked to provide information on the Park's expansion strategy and to indicate if the proposed mining area falls within such. SANParks indicated that they intended to expand in a southerly direction and did not raise any concerns at that time regarding this application. SANBI's BGIS site was also perused to determine the location of the site in relation to protected areas and expansion areas. Information on this portal indicates that the proposed site is not within any of these areas.

During the Scoping Phase, it was brought to our attention by the specialist botanist that the site falls within the park's buffer area. CES contacted Bernard van Lente of SANParks to confirm this information and received maps on the 2nd of April 2013. It should be noted that this information was provided the same day the Final Scoping Report had been approved by DENC.

SANParks' Planning Department (Mr Willem Louw) provided comment on the Final Scoping Report on the 3rd of September 2014. Dr Chantel Bezuidenhout discussed these comments with Mr Louw telephonically. Mr Louw indicated that SANParks would like to review all the documents including the specialist assessments, prior to providing any further input. A link to the Draft documents (available on the CES website) have been sent to SANParks, all suggestions and recommendations from key stakeholders will be incorporated into the Final EIR.

A meeting was held on the 24th of November at the SANParks offices in Port Elizabeth in order to brief SANParks officials on the findings of the EIR. There seemed to be some concerns in regards to the saltwater plume resulting from the backfill of the pit reaching the eastuary 10 km downstream of the project. The EAP suggested a meeting between SANParks and the hydrologists in order to better explain any water related issues (refer to email included below). SANParks however declined this offer and provided comments in writing (refer to second e-mail included below). These additional comments were received on the 4th and 9th of December. Responses to the written comments are included in Table 6.9 in Chapter 6 of this report. Based on these comments it was decided that the hydrologists will do some additional work on the connectivity of the estuary and the groundwater system on site. This work was undertaken in February 2015. The EAP once again offered to arrange a meeting between SANParks and the hydrologists in order to discuss the findings of the additional work undertaken (refer to 3rd e-mail included below). This offer was once again declined (refer to 4th e-mail included below).

E-mail 1

From: Chantel Bezuidenhout [mailto:c.bezuidenhout@cesnet.co.za]
Sent: 27 November 2014 02:44 PM
To: Knight, M (Dr) (Summerstrand Campus South)
Cc: Ted Avis; Willem Louw
Subject: Kamiesberg Project Namaqualand

Dear Mike

As per our telephonic conversation, we would like for the groundwater specialists to meet with SANParks next week in Port Elizabeth to provide more clarity on this issue. Would you kindly let me know what your staff's availability is for next week.

Also please note that in order to have this meeting we have extended the comment period to the 17th of December.

Thanks and Kind Regards Chantel

E-mail 2

From: Knight, M (Dr) (Summerstrand Campus South) [mailto:M.Knight@nmmu.ac.za]
Sent: 27 November 2014 16:27
To: Chantel Bezuidenhout
Cc: Willem Louw
Subject: RE: Kamiesberg Project Namagualand

Dear Chantel

I have communicated with Willem Louw, my point person on this matter, and it wont be necessary to have the ground water specialist come to PE, as we will provide our comments

by mid next week. Yours

Dr MH Knight Head: Park Planning & Development Conservation Services SANParks PO Box 76693 NMMU 6031 Port Elizabeth South Africa <u>Tel:+27-41-5085411</u> Fax:+27-41-5085415 Cell: 0836404918 Email: <u>mknight@nmmu.ca.za</u>

E-mail 3

From: Chantel Bezuidenhout [mailto:c.bezuidenhout@cesnet.co.za]
Sent: 25 February 2015 12:21 PM
To: Willem Louw; Mike Knight
Cc: Ted Avis
Subject: RE: Zirco Roode Heuwel Kamiesberg Mine EIA Economics Specialist Study

Dear Willem

If possible we would like to have a meeting with the same team we met with the last time at the SANParks Offices in Port Elizabeth. This way we will be able to discuss the following issues:

Responses to SANParks comments Briefing by the hydrologists on the findings of work done on site Any additional assessments undertaken.

If at all possible can we schedule this for the week of the 9th of March.

Kind Regards Chantel

E-mail 4

From: Willem Louw [mailto:Willem.Louw@sanparks.org]
Sent: 04 March 2015 11:12
To: Chantel Bezuidenhout
Cc: Mike Knight
Subject: RE: Zirco Roode Heuwel Kamiesberg Mine EIA Economics Specialist Study

Dear Chantel,

My apologies – I should have given you feedback. Unfortunately we are unable to convene a meeting with our PE team at this point in time. However, you are most welcome to discuss the matters listed below with me, if you so wish.

Kind regards

EOH Coastal & Environmental Services

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Willem

The list of conservation and planning tools that will be considered must also include the Northern Cape Spatial Development Framework, the ADUs coordinated water bird counts and SABAP datasets and the Leslie Hill Succulent Karoo Trust/World Wildlife Fund for Nature Priority Focus area for the conservation of the Succulent Karoo.

ADU Coordinated water bird counts:

The Animal Demography Unit (ADU) launched the Coordinated Waterbird Counts (CWAC) project in 1992 as part South Africa's commitment to International waterbird conservation. This is being done by means of a programme of regular mid-summer and mid-winter censuses at a large number of South African wetlands. Regular six-monthly counts are regarded as a minimum standard. It is one of the largest and most successful citizen science programmes in Africa, providing much needed data for waterbird conservation around the world. Currently the project regularly monitors over 400 wetlands around the country, and furthermore curates waterbird data for over 600 sites.

The ADUs coordinated water bird counts and SABAP datasets were accessed. Partial counts for the Groen River mouth wetland are given on the website, but regular monitoring appears to have covered 2005-2008, with no recent counts given. The ADU monitoring is voluntary and opportunistic, but the site could be mentioned.

Although the text doesn't cite this document (Northern Cape Provincial Spatial Development Framework, Vol. 2 Profile and Key Aspects. Dec 2011, Dennis Moss Partnership, 458p) it meets the relevant Environmental Key aspects (listed below)

Northern Cape Spatial Development Framework (NCDF)

The NCDP highlighted Key environmental aspects to be considered for sustainable development in the region, including (original numbering retained):

- Create appropriate ecological linkages between conservation areas.
- Designate coastal zone as a core conservation area.
- Enhance sustainable use of formal conservation areas and their resources.
- Enhance viability and sustainability of the Richtersveld Botanical and Landscape World Heritage Site which is the core of the Succulent Karoo Biodiversity Hotspot.
- Provide for biodiversity conservation in terms of SANBI's 'critical biodiversity area' (CBA) indicators.
- Provide strategy to off set loss of conservation worthy habitat through mining through ex-situ conservation projects.

With respect to the "Leslie Hill Succulent Karoo Trust/World Wildlife Fund for Nature Priority Focus area for the conservation of the Succulent Karoo": this is not a document but funding access that has been instrumental in protecting Succulent Karoo. Funding from the Leslie Hill Succulent Trust was responsible for 49,000 hectares of land acquisition in Namaqua NP from De Beers.

Leslie Hill Succulent Karoo Trust Priority Areas:

The Succulent Karoo Ecosystem Plan (SKEP) has been included in the Vegetation Assessment (Part of the specialist Volume), Chapter 5 section 5.5. The subcategories covered include SKEP Priority Areas and Leslie Hill Succulent Karoo Trust Priority Areas. This has also been addressed in the Faunal Assessment (Part of the specialist Volume) in Cahper 6, section 6.4.

The proposed mine has within its activity boundaries five national vegetation types, the Namaqualand Riviere and Namaqua Sand Fynbos will be most impacted by the proposed mine when contemplating farm boundaries. Approximately 2.4% (2.261 ha) of the Namaqualand Sand Fynbos is currently protected by Namaqua National Park in the north and south of the park. Suitable mitigation and management actions must be implemented to protect this vegetation unit.

Namaqua Sand Fynbos has been discussed in comprehensive detail in the Vegetation Assessment (Part of the specialist volume) as well as in Chapter 4 section 4.3; Chapter 8, section 8.3 and Chapter 9, section 9.1.

The Namaqua National Park authorities must be consulted in developing mitigation measures that will be effective in minimising the impacts in the Park.

Noted and agreed. Based on telephonic discussions with SANParks it was indicated by Mr Willem Louw that SANParks would like the opportunity to review all documents, including the specialist assessment prior to providing any further comment. All comments and recommendations provided by SANParks will be incorporated into the Final EIR.

A comprehensive survey of the flora of the development site must be undertaken in the appropriate (autumn to spring) rainfall period.

The ecological sensitivity of the area was assessed in three separate site visits. Site surveys occurred in July 2013 (autumn), Mid-August 2013 (spring) and again in August 2014 (spring). All finding have been recorded in the Vegetation Assessment (part of the Specialist Volume) and discussed in various sections of the EIAR.

APPENDIX F: PUBLIC PARTICIPATION PROCESS (INITIATION AND SCOPING PHASE)

APPENDIX F-1: BACKGROUND INFORMATION DOCUMENT

Background Information Document (English)



ZIRCO HEAVY MINERALS MINE: GARIES, NORTHERN CAPI

Project Location

Zirco Roode Heuwel (Pty) Ltd (hereafter referred to as Zirco) currently holds the prospecting right to the Roode Heuvel (6134 ha) and Leeuvlei (5986 ha) deposits, located approximately 500 km north of Cape Town and approximately 35 km to the southwest of the town of Garies in Northern Cape Province of South Africa. They are also in the process of acquiring prospecting rights for a further deposit immediately east and adjacent to Roode Heuvel, referred to as "Sables" (8674 ha). Zirco proposes to start dry mining this area for Heavy Minerals.

Project Description

Initial mining will target the higher grade resource, which will sustain the operation for 3 years of mining at a rate of approximately 1000 tonnes per hour (tph). After year 3 the operation will move to the lower grade areas and the mining rate will increase to approximately 1500 tph to maintain an average output of about 520 000 tons per annum (tpa). Over a 20 year mine life a total of 210 million tons would be mined.

The Mining Process

Mining will involve:

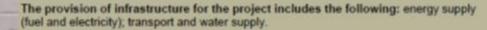
- Clearing vegetation and stockpiling topsoil ahead of the mine path
- Excavating the mineralised sand using front end loaders
- Transferring this material to a hopper from where it will be slurried and pumped to the primary concentration plant
- Transferring the material to the Mineral Separation Plant (MSP) which will process feed to produce ilmenite, monazite and rutile/zircon concentrate
- The area would then be back-filled after mining, covered with top soil and rehabilitated.

Legislative Requirements

The proposed project will require the completion of a Scoping and Environmental Impact Assessment (EIA) which will be undertaken in accordance with Regulations 21 to 25 of the EIA Regulations 2010. Authorization from the Department of Environmental Affairs as well as a Mining License from the Department of Minerals Resources and water use licenses from the Department of Water Affairs is required.

Potential Environmental Impacts

- Groundwater contamination: due to the use of salt water in the mining process, and impacts on the soil structure due to both the removal of fine material and the use of sea water
- Soil quality: mining will reduce the water holding and nutrient retention properties of the soil, as the fine material is removed from the soil profile during mining.
- Wind erosion: erosion could lead to the loss of valuable top soil.
- The disruption of drainage patterns.
- Effects on potable water due to atmospheric pollution (dust).
- Pollution of the environment.



Fuel supply

Diesel and paraffin will be required for the MSP as well as project related use thus

necessitating the need for constructing a fuel depot.

Power supply

Power will be required and sourced from the national power grid. This line would need to be constructed from the Frontier Rare Earths project at Langkops drift. It is intended to construct a high voltage transmission line to service this project. The powerline from Frontier to Roode Heuvel would be subject to a separate EIA undertaken directly on behalf of Eskom.

Product transport

Two options exist for the transport of products from the mining operation to the markets:

 Road haulage all the way to the Port of Saldanha
 A pipeline to the shoreline connected to a single point mooring (SPM) offshore, with slurry pumped from the mine onto vessels via the pipeline and SPM.

A reverse osmosis desalination plant is planned to be constructed on site close to the Mineral Processing Plant (MSP) so that sea water can be desalinated and used in the mineral processing that takes place in the MSP.

HOW CAN YOU BE INVOLVED?

The aim of this Background Information Document (BID) is to provide people affected by and interested in the proposed project with information about this project, the process being followed and to provide them with an opportunity to be involved in the EIA process.

If you register as an interested and affected party (I&AP), you will be notified of all major developments throughout the process.

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Potential Ecological Impacts

- Loss of biodiversity, as rehabilitation will be difficult due to changes to the soil environment
- Loss of vegetation, habitat and related impacts on fauna are all impacts that will need to be carefully assessed
- Habitat fragmentation and the potential for the invasion of alien species are also important potential impacts

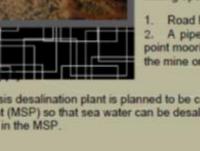
Potential Social Impacts

- Noise,
- Air quality.
- Visual impacts,
- Safety impacts,
- Traffic impacts, and
- Impacts related to the loss of land and livelihoods.

Positive social impacts relate to the stimulation of the local economy, the provision of employment, and social development opportunities through the operation of the mine and minerelated activities.

To register as an I&AP, Contact Lara Crous

- P: 046 622 2364
- F: 046 622 6564
- E: Lcrous@cesnet.co.za
- A: 67 African Street, Grahamstown, 6139



Background Information Document (Afrikaans)



ZIRCO, MINERALE MYN, GARIES, NOORD-KAAP

Projek Ligging

Zirco Roode Heuwel (Pty) Ltd (hierna verwys as Zirco) hou tans die prospekteerreg na die Roode Heuwel (6134 ha) en Leeuvlei (5986 ha) depositos, geleë ongeveer 500 km noord van Kaapstad en ongeveer 35 km na die suidweste van die dorp van Garies in die Noord-Kaap Provinsie van Suid-Afrika. Hulle is ook in die proses van verkryging van prospekteerregte vir 'n verdere deposito onmiddellik oos en aangrensend aan Roode Heuwel, verwys as "Sabies" (8674 ha). Zirco stel voor om droog te begin myn in hierdie gebied vir swaar minerale.

Projek Beskrywing

Aanvanklike ontginning is gerig op die hoër graad hulpbron, wat die mynbou vir 3 jaar sal handhaaf teen 'n tempo van ongeveer 1000 ton per uur (TPU). Na jaar 3 sal die operasie skuif na die laer graad gebiede en die mynbou tempo sal verhoog tot ongeveer 1500 TPU wat 'n gemiddelde opbrengs van sowat 520 000 ton per jaar (tpa) in stand sal hou. Oor 'n tydperk van 20 jaar sal 'n totale 210 miljoen ton ontgin word.

Die Mynbou Proses

Mynbou behels:

- verwydering van plantegroei en bewaring van bo-grond voor die myn pad
- uitgrawing van die minerale sand deur gebruik te maak van laaigrawe,
- oordrag van die materiaal na 'n hopper van waar dit gepomp sal word na die primêre konsentrasie plant,
- oordrag van die materiaal na die Mineraal Skeidingsaanleg (MSA) wat die voer sal prosesseer om ilmeniet, monasiet en rutiel / sirkoon konsentraat te produseer,
- die gebied sal dan opgevul word na die mynbou, bedek word met bo- grond en gerehabiliteer word.

Wetlike vereistes

Die voorgestelde projek vereiste is die voltooiing van 'n Bestekopname-en Omgewingsimpakevaluering (OIE) in ooreenstemming met die regulasies 21 tot 25 van die OIE Regulasies 2010. Magtiging van die Departement van Omgewingsake sowel as 'n mynlisensie van die Departement van Minerale Hulpbronne en watergebruik lisensie van die Departement van Waterwese is 'n vereiste.

Potensiele omgewingsimpakte

- Grondwaterbesoedeling: as gevolg van die gebruik van sout water in die mynbou-proses en die impak op die grond struktuur as gevolg van beide die verwydering van fyn materiaal en die gebruik van seewater
- Grondkwaliteit: mynbou sal die watehouvermoë en voedingstowwe behoud van die grond verminder, as die fyn materiaal tydens mynbou verwyder word
- Winderosie: erosie kan lei tot die verlies van waardevolle bo-grond
- Die ontwrigting van dreinerings patrone.
- Uitwerking op drinkbare water as gevolg van lug besoedeling (stof)
- Besoedeling van die omgewing

Die voorsiening van infrastruktuur vir die projek sluit die volgende in: Energievoorsiening (brandstof en elektrisiteit), vervoer en watervoorsiening.

Brandstoftoevoer

Diesel en paraffien sal vereis word vir die MVE sowel as projek verwante gebruik dus noodsaak dit die behoefte vir die bou van 'n brandstof depot.

Kragtoevoer

Word vereis en afkomstig van die nasionale kragnetwerk. Hierdie kraglyn sal moet opgebou word uit die Frontier Rare Earths projek by Langkopsdrif. Die kraglyn van Frontier na Roode Heuwel sal onderhewig wees aan 'n aparte OIE vir Eskom.

Produkvervoer

Twee opsies bestaan vir die vervoer van produkte van die myn na die mark:

 Padvervoer na die hawe van Saldanha.
 'n Pyplyn na die kus wat verbind aan 'n buitelandse enkel punt anker afval pomp van die myn na die skepe via die pyplyn.

Watervoorsiening

EOH Coastar a Environmentar Services

'n Omgekeerde Osmoseaanleg word beplan om gebou te word op die terrein naby die Mineraal Verwerkingseenheid (MVE) sodat seewater kan ontsout word en gebruik word in die verwerking van minerale wat plaasvind in die MVE.

Hoe om betrokke te raak

Die doel van hierdie Agtergrondinligtingsdokument (AID) is om mense wat geraak word deur en belangstel in die projek met inligting oor hierdie projek te verskaf, die proses wat gevolg word en om hulle te voorsien met 'n geleentheid om betrokke te raak in die Omgewingsimpakevaluering (OIE) proses.

As jy registreer as 'n belangstellende en geaffekteerde party (B & GP), sal jy in kennis gestel word van al die groot ontwikkelings tydens die hele proses.

Potensiële Ekologiese Impakte

- Verlies aan biodiversiteit, rehabilitasie sal moeilik wees as gevolg van veranderinge in die grond omgewing
- Verlies aan plantegroei, habitat en verwante impak op die fauna is almal impakte wat versigtig sal beoordeel moet word
- Habitat en die potensiaal vir die oorgroei van uitheemse spesies is ook belangrike potensiële impakte

Potensiële Sosiale Impakte

- Geraas
- Kwaliteit van die lug
- Visuele impakte
- Veiligheids impakte
- Verkeers impakte,
- Impakte wat verband hou met die verlies van grond- en lewensbestaan

Positiewe sosiale impak het betrekking tot die stimulering van die plaaslike ekonomie, die bepaling van indiensneming en geleenthede vir sosiale ontwikkeling deur die werking van die myn en myn-verwante aktiwiteite.

Om te registreer as belanghebbende

persoon, kontak Lara Crous

- P: 046 622 2364
- F: 046 622 6564
- E: I.crous@cesnet.co.za
- A: 67 African Straat, Grahamstad, 6139

APPENDIX F-2: COPIES OF LETTERS SENT TO I&APs AND PROOF OF RECEIPT

1. Landowners and occupiers directly affected by mining activities:

1.1 Contact Details

Farm Name	Portion Number	Landowner	Contact Number	Postal Address
Klipdam No 633	633	Jacob van Zyl	027 531 1014	P.O. Box 334, Garies, 8220
Roode Heuwel 502	1/502	Marius van Zyl	027 531 1010	P.O. Box 8, Garies, 8220
Roode Heuwel 502	5/502	Izak Engelbreght	027 531 1027	P.O.Box 190, Garies, 8220
Roode Heuwel 502	6/502	Izak Engelbreght	027 531 1027	P.O.Box 190, Garies, 8220
Roode Heuwel 502	9/502	Alwyn van Zyl	083 353 4598	P.O.Box 905, Vredendal, 8160
Leeuvlei 642	642	Jan C. Engelbrecht	027 531 1030	P.O. Box 10, Vanrhynsdorp, 8170
Soutkraal 437	1/437	Johan Engelbrecht	027 581 1095	P.O. Box 338, Garies, 8220
Klipheuwel 435	9/435	Jan C. Engelbrecht	027 531 1030	P.O. Box 10, Vanrhynsdorp, 8170
Klipheuwel 435	10/435	Jan C. Engelbrecht	027 531 1030	P.O. Box 10, Vanrhynsdorp, 8170
Klipheuwel 435	11/435	lan Coetzee	082 726 9297	P.O.Box 133, Lutzville, 8165
Sabies 505	2/505	Jan C. Engelbrecht	027 531 1030	P.O. Box 10, Vanrhynsdorp, 8170
Hawerland 503	1/503	Deon Engelbreght	021 851 2420	P.O. Box 1163, Somerset West, 7129
Hawerland 503	2/503	Izak Engelbreght	027 531 1027	P.O. Box 190, Garies, 8220
Hawerland 503	3/503	Miemie Englebrecht	027 531 1029	P.O. Box 190, Garies, 8220
Hawerland 503	RE/503	Miemie Englebrecht	027 531 1029	P.O. Box 190, Garies, 8220

1. Details of landowners and occupiers adjacent to proposed mining activities

Farm Name	Portion Number	Contact Person	Contact Number	Postal Address
Roode Heuwel 502	4/502	Tronox Mineral Sands (Pty) Ltd	022 701 3911	115 West Street, Sandton, 2196
Roode Heuwel 502	RE/502	Dirk van Zyl	027 531 1016	P.O. Box 8, Garies, 8220
Klipheuwel 435	3/435	Johan Engelbrecht	027 581 1095	P.O. Box 338, Garies, 8220
KWASS 501	RE/501	Namaqua National Park Petrus Schreuder	0276721948	P.O. Box 117, Kamieskroon,8241
Rooiheuwel 634	634	Dirk van Zyl	027 531 1016	P.O. Box 8, Garies, 8220
Klipheuwel 435	RE/435	Gert and Hestelle Engelbrecht	027 581 1021	P.O. Box 79, Garies, 8220
Klipheuwel 435	7/435	Gert and Hestelle Engelbrecht	027 581 1021	P.O. Box 79, Garies, 8220
Klipheuwel 435	3/435	Johan Engelbrecht	027 581 1095	P.O. Box 338, Garies, 8220
Soutfontein 436	2/436	J.C.C de Villiers	021 581 1020	P.O. Box 113, Garies, 8220
Soutfontein 436	3/436	J.C.C de Villiers	021 581 1020	P.O. Box 113, Garies, 8220
Soutfontein 436	6/436	Gert and Hestelle Engelbrecht	027 581 1021	P.O. Box 79, Garies, 8220
Soutkraal 437	3/437	J.C.C de Villiers	021 581 1020	P.O. Box 113, Garies, 8220
Soutkraal 437	4/437	J.C.C de Villiers	021 581 1020	P.O. Box 113, Garies, 8220
Groenrivier's Vallei 504	2/504	W.D.Engelbrecht	027 531 1032	P.O. Box 48, Garies,8220
Groenrivier's Vallei 504	3/504	G.G Kotze	027 531 1026	P.O. Box 1, Garies, 8220
Groenrivier's Vallei 504	5/504	G.G Kotze	027 531 1026	P.O. Box 1, Garies, 8220
Groenrivier's Vallei 504	6/504	W.D.Engelbrecht	027 531 1032	P.O. Box 48, Garies, 8220
Groenrivier's Vallei 504	7/504	W.D.Engelbrecht	027 531 1032	P.O. Box 48, Garies, 8220
Sabies 505	RE/505	W.D.Engelbrecht	027 531 1032	P.O. Box 48, Garies, 8220
Sabies 505	1/505	Jan C. Engelbrecht	027 531 1030	P.O. Box 10, Vanrhynsdorp, 8170
Sabies 505	6/505	W.D.Engelbrecht	027 531 1032	P.O. Box 48, Garies, 8220
Klipheuwel 435	3/435	Johan Engelbrecht	027 581 1095	P.O. Box 338, Garies, 8220

1.2 Proof of Notification Letters

List of REGISTERED LETTERS Lys van GEREGISTREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie) Post Office Full tracking and tracing/Volledige volg en spoor Name and address of sender: Enquiries/Navrae can Naam en adres van afsender **Toll-free number** 6139 Shect **Tolvry nommer** 0800 111 502 Insured Insurance Affix Track and Trace Postage Service fee Name and address of addressee amount fee customer copy No Plak Volg-en-Spoor-Naam en adres van geadresseerde Versekerde Verseke-Posgeld Diensaeld ringsgeld kliëntafskrif bedrag REGISTERED LETTER (with s domestic insurance option) ShareCall 0860 111 502 www.sapo.co.zu PO.BOX 334 laceb von Zul 1 RD 912 238 242 ZA arie. 87 REGISTERED LETTER with a domestic insurance option) areGall 0860 111 502 www.sapo.co.za .O. BOX 8 SVON RD 912 238 256 ZA 2 CUSTOMER COPY 301028R 8 REGISTERED LETTER (with a domestic insurance option) SharaCall 0860 111 502 www.sapo.co.za Cocelbrecht RD 912 238 260 ZA 3 ories 8220 190 CUSTOMER COPY 301028R REGISTERED LETTER (with a domestic insurance option) ShareCall 0800 111 502 www.sapo.co.z RD 912 238 273 ZA (11) Vicn 4 8160 qn5 redenda CUSTOMER COPY 3040990 REGISTERED LETTER (with a domestic insurance option) Sharacall 0869 111 502 www.sapo.co. RD 912 238 287 ZA 5 80 SO CUSTOMER COPY 301028R REGISTERED LETTER (with a domestic insurance option) ShareGall 0860 111 502 www.sapo.co.za 301028R RD 912 238 295 ZA 6 rieo 8550 ONER COPY 301028R REGISTERED LETTER with a domestic insurance option areCall 0860 111 502 www.sapo.co (11 7 RD 912 238 300 ZA Itzuille 8165 CI REGISTERED LETTER RD 912 238 313 ZA 8 CUSTOMER COPY 301028R =+1160+7129 REGISTERED LETTER RD 912 238 327 ZA 9 51001 8241 BOX 117 CUSTOMER COPY 301028R REGISTERED LETTER U.D. Engelba (with a domestic insurance option) Share Call 0650 111 502 work sopp co.za RD 912 238 335 ZA 10 IONE P.0.50X 8220 100 CUSTOMER COPY 301028R Total R R R R Number of letters posted Totaal Getal briewe gepos Signature of client Handtekening van kliënt Date stamp Signature of accepting officer Handtekening van aanneembeampte The value of the contents of these letters is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100,00. No compensation is payable without documentary proof. Optional insurance of up to R200,00 is available and applies to domestic registered letters only. Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100,00. Geen vergoeding is sonder dokumentere bewys betaalbaar nie. Opsionele versekering van tot R2 000,00 is beskikbaar en is slegs op binnelandse geregistreerde briewe van toepassing. Datumstempel 701248 MASIQHAME PRINTERS

Kamiesberg Project Final Environmental	Impact Assessment Report	- Appendices

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1.3 Proof of Delivery

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					2	In transit	2013/10/04	19:17	CAPEMAIL (HUB)	
					-				PORT	
					3	In transit	2013/10/03	16:40	ELIZABETH (HUB)	
					4	Item accepted by branch	2013/10/03	11:16	GRAHAMSTOWN	
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						ТҮРЕ	DATE	TIME		COMMENTS
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					2	At Office	2013/10/05	07:37	CONFRONT	First Notification to recipient
					3	In transit	2013/10/04	19:14	CAPEMAIL	recipient
							<u> </u>		PORT	
					4	In transit	2013/10/03		(HUB)	
					5	Item accepted by branch	2013/10/03	11:17	GRAHAMSTOWN	
					43			Online 1	toolsPlease se	elect
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				» Welcome to the South	African Postal	Services tem Tracking:		romer Su		
	5.4			* Welcome to the South Track and Trace	African Postal	Services tem Tracking: umber: 1932	A CENTRE CUS1	TOMER SU	Submit	
9	Petrus	RD	912 238 327	* Welcome to the South Track and Trace	African Postal Domestic I Domestic N PARCEL TR	Services tem Tracking: umber: rd912 ACKING RESULTS	1238327za		Submit	
9	Petrus Schreuder	RD ZA	912 238 327	* Welcome to the South Track and Trace	African Postal Domestic I Domestic N PARCEL TR. Item Num Location I	Services tem Tracking: umber: (1911 ACKING RESULTS ber: RD9122383277 ast scanned: KAM1	ZA was last : IESKROON		Submit	
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9			912 238 327	* Welcome to the South Track and Trace	African Postal Domestic I Domestic N PARCEL TR. Item Num Location I Currently IRACKING LINE	Services tem Tracking: umber: 0912 ACKING RESULTS ber: RD9122383277 ast scanned: KAMI has status of: Oth TYPE	ZA was last : EESKROON er DATE	scanne <u>11ME</u> 14:25	Submit d on: 2013/10/09 BRANCH KAMIESKROON UPINGTON (HUB)	at 14:25
9			912 238 327	* Welcome to the South Track and Trace	African Postal Domestic I Domestic N PARCEL TR. Item Num Location I Currently IRACKING LINE i	Services tem Tracking: umber: rd912 ACKING RESULTS ber: RD9122383272 ast scanned: KAMI has status of: Oth <u>IYPE</u> Other	ZA was last s IESKROON er DATE 2013/10/09	<u>TIME</u> 14:25 11:49	Submit d on: 2013/10/09 BRANCH KAMIESKROON UPINGTON (HUB) PORT	at 14:25 <u>COMMENTS</u> FIRST NOTICE AT

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11	A.C. de Villiers	RD ZA	912 238 344	Joinead, nationing	PARCEL TR Item Nun Location	ACKING RESULTS	A was last s	cannee		at 15:49
11	A.C. de Villiers		912 238 344	Joinead, navong	PARCEL TR Item Nun Location	ACKING RESULTS aber: RD912238344Z last scanned: GARI	A was last s		d on: 2013/10/09	at 15:49 COMMENTS
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2. Details of landowners and occupiers which may be affected by the <u>construction of the</u> <u>pipeline</u>

2.1 Contact Details

2.1 Contact Deta Farm Name	Portion Number	Landowner	Contact Person	Contact Number	Postal Address
Klipkuil 547	2/547	Willem Petrus Auret	Willem Petrus Auret	083 275 9791	P.O. Box 85 Lamberts Bay 8130
Klipkuil 547	8/547	Groenriviersmond Trust	A.A. Niewoudt	027 531 1046	P.O. Box 37 Garies 8220
Klipkuil 547	10/547	Groenriviersmond Trust	A.A. Niewoudt	027 531 1046	P.O. Box 37 Garies 8220
Rooiheuwel 634	634	Dirk van Zyl	Dirk van Zyl	027 531 1016	P.O. Box 8, Garies, 8220
Roode Heuvel 502	RE/502	Dirk van Zyl	Dirk van Zyl	027 531 1016	P.O. Box 8, Garies, 8220
Eiland Punt Noord 549	1/549	Willem Petrus Auret	Willem Petrus Auret	083 275 9791	P.O. Box 85 Lamberts Bay 8130
Eiland Punt Noord 549	2/549	De Beers Consolidated Mines (Pty) Ltd		053 839 4111 053 839 4210	P.O. Box 616 Kimberley, 8300
Eiland Punt Noord 549	3/549	Groenriviersmond Trust	A.A. Niewoudt	027 531 1046	P.O. Box 37 Garies 8220
Eiland Punt Noord 549	4/549	Groenriviersmond Trust	A.A. Niewoudt	027 531 1046	P.O. Box 37 Garies 8220
Eiland Punt Noord 549	RE/549	De Beers Consolidated Mines (Pty) Ltd		053 839 4111 053 839 4210	P.O. Box 616 Kimberley, 8300
Strandfontein 559	RE/559	Sedex Desalination	Stuart Smith	021 446 6040	P.O. Box 8399, Cape town, 8012
Eiland Punt Zuid 550	1/550	Kambrolandskap Koop Ltd	onia@ telkomsa.net	082 773 2524	P.O. Box 95 Orania, 8752
Eiland Punt Zuid 550	2/550	Willem Petrus Auret	Willem Petrus Auret	083 275 9791	P.O. Box 85 Lamberts Bay 8130
Eiland Punt Zuid 550	3/550	Groenriviersmond Trust	A.A. Niewoudt	027 531 1046	P.O. Box 37 Garies 8220
Eiland Punt Zuid 550	RE/550	De Beers Consolidated Mines (Pty) Ltd		053 839 4111 053 839 4210	P.O. Box 616 Kimberley, 8300

2.2 Proof of Notification Letter

List of REGISTERED LETTERS Lys van GEREGISTREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie) ice Full tracking and tracing/Volledige volg en spoor Name and address of sender: Enquiries/Navrae 0 Naam en adres van afsender:.. Toll-free number 2 mag Tolvry nommer 0800 111 502 Insured Insurance Affix Track and Trace Postage Service fee Name and address of addressee amount fee customer copy No Naam en adres van geadresseerde Versekerde Verseke Plak Volg-en-Spoor-Posgeld Diensaeld bedrag ringsgeld kliëntafskrif REGISTERED LETTER (with a demestic insurance optio SharaCall 0860 111 502 www.sapo.cc 1 RD 912 238 551 ZA Rox 8399 Capetain sol2 USTOMER COPY share Call 0860 111 502 WHY. Sapo.co RD 912 238 565 ZA CUSTOMER COPY 301028R dicord POKCX 616 2 CUSTOMER COPY REGISTER COPY 301028R 300 S (with a domestic insurance option, ShareCall 0860 111 502 www.sapc.o.za RD 912 238 579 ZA 3 CUSTOMER COPY 301028R 0553 REGISTERED LETTER (with a domestic insurance option) ShareGall 0860 111 802 www.sapp.co.za RD 912 238 582 ZA 1000rivicomond 4 RIG 2522 CUSTOMER COPY 301028R REGISTERED LETTER with a domestic insurance option) areCall 0800 111 502 www.sapo.co.za RD 912 238 596 ZA (w) Sha 5 SISC CN CUSTOMER COPY 301028R REGISTERED LETTER (with a domestic Insurance option) ShareCall 0860 111 502 www.sapo.co.za nombroland 6 RD 912 238 534 ZA 95 8 152 KOX Imnia USTOMER COPY 301028R 7 8 9 10 Total R R R R Number of letters posted Totaal Getal briewe gepos Signature of client Handtekening van kliënt Signature of accepting officer 1 Date stamp Handtekening van aanneembeampte The value of the contents of these letters is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100,00. No compensation is payable without documentary proof. Optional insurance of up to R200,00 is available and applies to domestic registered letters only. Die waarde van die inhoud van hierdie briewe is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100,00. Geen vergoeding is sonder dokumentere bewys betaalbaar nie. Opsionele versekering van tot R2 000,00 is beskikbaar en is slegs op binnelandse geregistreerde briewe van toepassing. Datumstempel MASIQHAME PRINTERS 701248

2.3 Proof of Delivery

No.	Name	Trace Number			S	Status			
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3. Stakeholders of the Project

3.1 Contact Details

Stakeholder	Contact Person	Contact	Postal Address
		Number	
	National		
DEA: Oceans and Coasts	ChiefDirectorateIntegratedCoastalManagement:Dr Razeena Omar	021 819 2432	Private Bag X447, Pretoria, 0001
South African National Roads Agency (SANRAL)	SANRAL Corporate Office	012 426 6000	PO Box 415, Pretoria, 0001
Department of Agriculture, Forestry and Fisheries	Office of the Minister : Mr Andrew Bartlett	012 319 7150 (PTA) 021 467 4502 (CPT)	Private Bag x9087, Cape Town, 8000
Department Of Agriculture	Minister For Agriculture And Land Affairs: Ms Tina Joemat-Petterson	053 831 4049	Private Bag X5018, Kimberley 8300
Department Of Agriculture	Head Of The Department: Mr Viljoen Mothibi	053 838 9100.	,
Eskom Transmission: Grid connectivity and capacity	Itumeleng Moeng	011 800 4114	Megawatt Park – D1 Y39, PO Box 1091, Johannesburg, 2000
Transnet National Ports Authority (TNPA)	Transnet National Port Authority Head Office	011 351 9001	P O Box 32696, Braamfontein, 2017
Department Of Water Affairs (DWA)	Media Liaison Officer: Mr Mandla Mathebula	012 336 8733 / 90 083 235 8675	Private Bag X313, Pretoria,0001
South African Heritage Resources Agency (SAHRA)	Head Office	021 462 4502	PO Box 4637, Cape Town, 8000
Department of Mineral Resources (DMR)	Director General's Office: Mr Khayalethu Matrose	012 444 3308	Private Bag X59, Arcadia, 0007
	Provincial – Wester	n Cape	
SANRAL (Western Region)		021 957 4600	Private Bag X19, Bellville, 7535
Department: Roads and Public Works (Western Cape)	Head of Department: Johan Fourie	021 483 2826	Private Bag X9185, Cape Town, 8001
Transnet National Ports Authority (TNPA)	Port of Saldanha	022 701 4302/4	Private Bag X1, Saldanha, 7395
Department of Agriculture – Western Cape	Media Liaison Officer : Agriculture Mr Wouter Krie	021 483 4930 079 694 3085	Private Bag X9179, Cape Town, 8000
Department Of Water Affairs (DWA)	Chief Director: Western Cape Mr R Khan	021 941 6000 082 809 2218	Private Bag X16, Sanlamhof, 7532
Heritage Western Cape	Andrew Hall	021 483 5959	3rd Floor, Protea Assurance Bldg, Greenmarket Square, Cape Town, 8000
Department of Mineral Resources (DMR)	Regional Manager: Sivuyele Mpakane	021 427 1000	Private Bag X 9, ROGGEBAAI, 8012

3.2 Proof of Notification Letter

List of REGISTERED LETTERS Lys van GEREGISTREERDE BRIEWE (with an insurance option/met 'n versekeringsopsie)



Full tracking and tracing/Volledige volg en spoor

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3.3 Proof of Delivery

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2	SANRAL Corporate Office	RD 912 238 619 ZA	Online tools Please select We deliver, whatever it takes. Name[links]Contact us[Legal PERSONAL BUSINESS ABOUT US MEDIA CENTRE CUSTOMER SUPPORT STAMPS AND SHOP * Direct marketing tools* Change of address* Poducts and services* National Bulk Mail Service Guide Track and Trace * Domestic Tracking Submit PARCEL TRACKING RESULTS Item Number: RUD1223861922 A was last scanned on: 2013/11/04 at 12:38 Location last scanned: PRETORIA GPO Currently has status of: At Office The Status of: At Office The At Office 2 In transit 2013/11/04 30 9:57 TSHVANNE
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3	Ms Tina Joemat- Petterson	RD 912 238 622 ZA	Post Offic We deliver, whatever it PERSONAL * Sending within SA* Send Track and Trace * Domestic Tracking	takes. WSINESS ing overseas Domestic M PARCEL TH Item Nun Location	Bill payment & fins Item Tracking: iumber:	A CENTRE CUST notal services 20313530227 ZA was last s 3ERLEY Office 2013/11/02 2013/10/30 2013/10/30	 Postb Fostb 	PPORT STAMPS AN ank» Products an Submit Ed on: 2013/11/02 BRANCH KIMBERLEY KIMBERLEY KIMBERLEY (HUB) PORT ELIZABETH (HUB) GRAHAMSTOWN	home links Contac) SHOP d services
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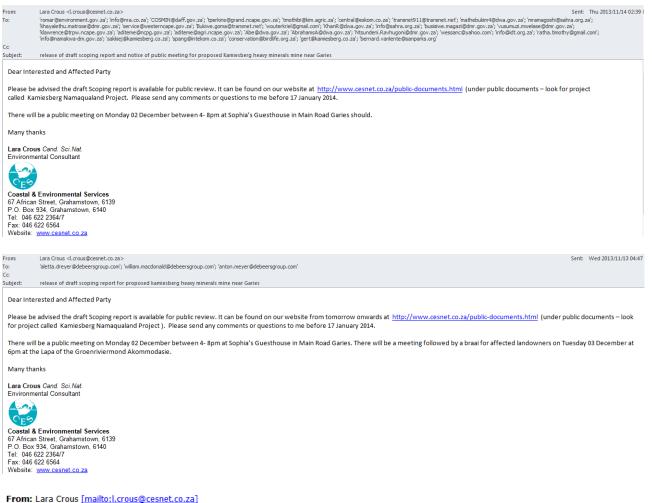
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APPENDIX F-3: EMAILS SENT TO I&APS NOTIFYING THE AVAILABILITY OF DRAFT SCOPING REPORT



Sent: 13 November 2013 04:47 PM

Cc: 'bernard.vanlente@sanparks.org'; 'petrus.schreuder@sanparks.org'; 'deidre.williams@dmr.gov.za'; 'karstenl.denc@gmail.com'; 'Cornelia Klak'; 'duplessisdavid@yahoo.com'; 'Derick de Wit'; se@museumsnc.co.za ; juddkirkel@yahoo.com; berylwa@museumsnc.co.za

Subject: release of draft scoping report for proposed kamiesberg heavy minerals mine near Garies

Dear Interested and Affected Party

Please be advised the draft Scoping report is available for public review. It can be found on our website from tomorrow onwards at <u>http://www.cesnet.co.za/public-documents.html</u> (under public documents – look for project called Kamiesberg Namaqualand Project). Please send any comments or questions to me before 17 January 2014.

There will be a public meeting on Monday 02 December between 4- 8pm at Sophia's Guesthouse in Main Road Garies.

Many thanks

Lara Crous Cand. Sci.Nat. Environmental Consultant

APPENDIX F-4: ATTENDENCE REGISTER FROM DRAFT SCOPING REPORT DISCLOSURE

Kamiesberg Heavy Mineral Mine - Draft Scoping Report. Monday & Ocember 2013 Sochos Guet

Name	Farmer/Organisation	Phone Number	Email	Signature
IS Struss	Froutur Rove Earths	o72 624 7352	jistransq@frontiarrave earths.co.29	
T.S. Nieuwoudl	BUERDERY	027 652110		Minwoudt
F. DE BEUM	Gastehuis	032 653 1069	teltonsa Egiticguesthausee	J
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Kamiesberg Heavy Mineral Mine – Draft Scoping Report. Tuesday CB. Dec. 2013.

Name	Farmer/Organisation	Phone Number	Email	Signature
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H Niemward.	Rondausel	0275311046	Dettoursa.	nel Al. 12
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APPENDIX F-5: REGISTERED LETTER SENT TO ALL I&APS NOTIFYING THEM OF THE AVAILABILITY OF DRAFT EIR AS WELL AS PROOF OF SENDING THESE NOTIFICATIONS



Geagte Belanghebbende en Geaffekteerde party

31 Oktober 2014

KENNISGEWING AANGAANDE DIE VOORGESTELDE SWAAR MINERAAL-DROëMYNBOU AKTIWITEIT EN DIE KONSTRUKSIE VAN GEPAARDGAANDE INFRASTRUKTUUR, NAMAKWALAND, NOORD-KAAP PROVINSIE, SUID-AFRIKA.

Verwysingsnommers: NC/EIA/13/NAM/KAM/RLS1/2013, NCP/EIA/0000249/2013

Die Kamiesberg -projek, waarvan die doel is om swaar minerale te ontgin, is geleë 35 km suidwes van die dorp Garies in die Noord-Kaap Provinsie van Suid-Afrika. Zirco Roode Heuwel (Pty) Ltd ("Zirco") hou tans die prospekteerregte vir die Roode Heuvel (6 314 ha) en Leeuvlei (6 005 ha) depositos, en is ook in die proses om addissionele prospekteerregte te verkry vir 'n verdere deposito onmiddellik oos van en aangrensend aan Roode Heuwel, hierna verwys as " Sabies " (8 600 ha). Hierdie verslag handel oor al drie gebiede wat gekombineer die Zirco Kamiesberg Projek vorm. Bykomend tot die mynbou en die gepaardgaande infrastruktuur (byvoorbeeld 'n minerale skeidingsaanleg, primêre konsentraataanleg, slikdamme, kantore, werkswinkels en stoorkamers), sal die projek ook die konstruksie van verskeie bykomende infrastruktuur benodig soos, maar nie beperk tot, die volgende:

- Seewater inname, ontsoutingsaanleg, pomp stasie en pyplyn
- Rioolsuiweringsaanleg
- Produk oordrag stasies
- Landingstrook
- Opgradering van die N7 pad
- Brandstof depot
- Konstruksie en bedryfs akkommodasie

EOH Coastal & Environmental Services (CES) wil graag hiermee belangstellende en geaffekteerde partye in kennis stel van die vrystelling van die Konsep Omgewings-, Gesondheids- en Maatskaplike impak evalueringverslag (ESHIAR) en geassosieerde Spesialis Volume, vir openbare oorsig en kommentaar. Die oorsigtydperk sal vanaf 31 Oktober tot 9 Desember 2014 strek. Maak asseblief seker dat U kommentaar ons bereik voor of op 9 Desember 2014.

Afskrifte van hierdie verslag is beskikbaar by:

- Groenriviersmond Akkommodasie
- Sophia's gastehuis op Garies
- CES se webtuiste by www.cesnet.co.za (Kliek op openbare dokumente)

Alle belanghebbende en geaffekteerde partye (B&GP) en lede van die publiek word genooi om die opedae by die volgende plekke by te woon -

Woensdag, 19 November 2014, 4-8nm by Sophia's Gastehuis in Garies

Consulting | Technology | Outsourcing

Directors: AM Avis (MD), A Bohbot and JW King

Coastal and Environmental Services (Pty) Ltd tel: +27 41 585 1715 13 Stanley Street, Richmond Hill Port Elizabeth 600, South Africa www.eoh.co.za | www.cesnet.co.za reg no: 2012/151672/07



• Donderdag, 20 November 2014, 4-8nm by Groenriviersmond Akkommodasie.

CES sal dit waardeer as U die ontvangs van hierdie kennisgewing kan erken. Vir meer inligting of enige navrae en bekommernisse, voel asseblief vry om Dr Chantel Bezuidenhout of Mev Kim Brent te kontak by:

E-pos: <u>c.bezuidenhout@cesnet.co.za</u> or <u>k.brent@cesnet.co.za</u> Faks: 086 604 8781 Tel: 041 585 1715 Posadres: 13 Stanley Straat, Richmond Hill, Port Elizabeth, 6001

Vriendelike Groete,

Kim Brent Omgewings Konsultant



Dear Key Interested and Affected Party

31 October 2014

NOTIFICATION REGARDING THE KAMIESBERG HEAVY MINERALS MINING PROJECT, NAMAQUALAND, NORTHERN CAPE PROVINCE, SOUTH AFRICA.

Reference numbers: NC/EIA/13/NAM/KAM/RLS1/2013, NCP/EIA/0000249/2013

The Kamiesberg Project, the purpose of which is to exploit proven heavy mineral sand deposits, is situated 35 km to the southwest of the town of Garies in the Northern Cape Province of South Africa. Zirco Roode Heuwel (Pty) Ltd holds the prospecting rights to the Roode Heuvel (6 314 ha) and Leeuvlei (6 005 ha) deposits, and are also in the process of acquiring prospecting rights for a further deposit immediately east of and adjacent to Roode Heuvel, referred to as "Sabies" (8 600 ha). This report deals with all three areas which combined form Zirco's Kamiesberg Project. In addition to the mining and associated infrastructure (mineral separation plant, primary concentrator plant, tailings dam, offices, workshops and stores, for example.), the project will also require the construction of various ancillary infrastructure such as, but not limited to, the following:

- Seawater intake, desalination plant, pumping station and pipeline
- Waste water treatment works
- Product transfer stations
- Airstrip
- Upgrade of the provincial road to and junction with the N7 road
- Fuel Depot
- Construction and operation accommodation

EOH Coastal & Environmental Services (CES) would hereby like to notify interested parties of the release of the Draft Environmental, Health and Social Impact Assessment Report (ESHIAR) and Specialist Volume for public review and comment. The review period is from 31 October until 9 December 2014. Please ensure that your comments reach us on or before 9 December 2014.

Copies of the ESHIAR will be available for review at the following locations:

- Groenriviermond Akkomodasie
- Sophia's Guesthouse at Garies
- The CES website (<u>www.cesnet.co.za</u>) click on public documents

All Interested and Affected Parties (I&APs) and members of the public are also invited to attend the open days held at the following locations –

- Wednesday, 19 November 2014 from 4-8pm at Sophia's Guesthouse in Main Road, Garies
- Thursday, 20 November 2014 from 4-8pm at the Groenriviersmond Akkomodasie.

Consulting | Technology | Outsourcing

Directors: AM Avis (MD), A Bohbot and JW King

Coastal and Environmental Services (Pty) Ltd tel: +27 41 585 1715 13 Stanley Street, Richmond Hill Port Elizabeth 600, South Africa www.eoh.co.za | www.cesnet.co.za reg no: 2012/151672/07



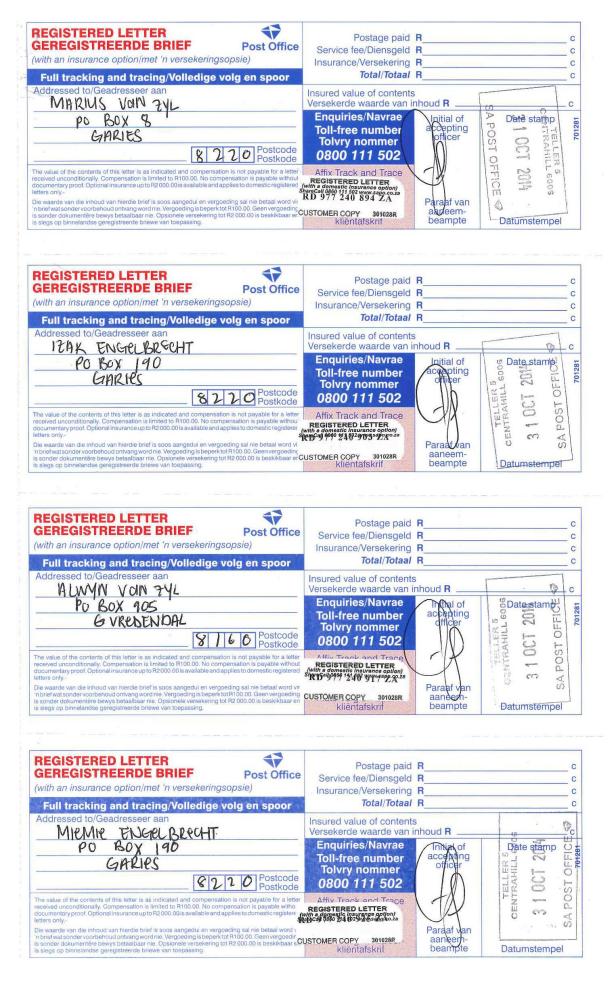
CES will be pleased if you could please acknowledge receipt of this letter of notification. For more information or any queries and concerns, please feel free to contact Dr Chantel Bezuidenhout or Mrs Kim Brent at:

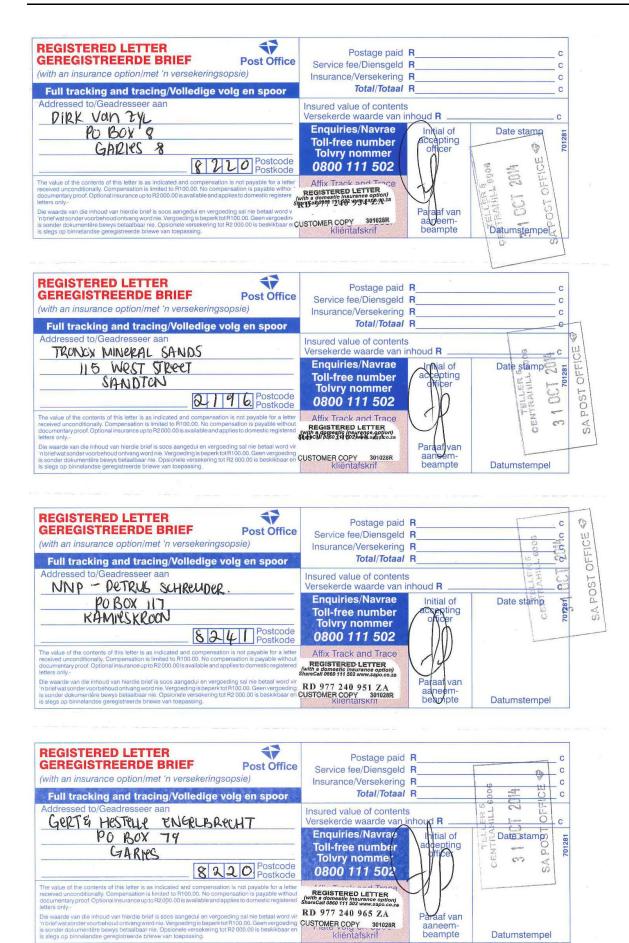
E-mail: <u>c.bezuidenhout@cesnet.co.za</u> or <u>k.brent@cesnet.co.za</u> Fax: 086 604 8781 Tel: 041 585 1715 Postal address: 13 Stanley Street, Richmond Hill, Port Elizabeth, 6001

Sincerely,

Kim Brent Environmental Consultant

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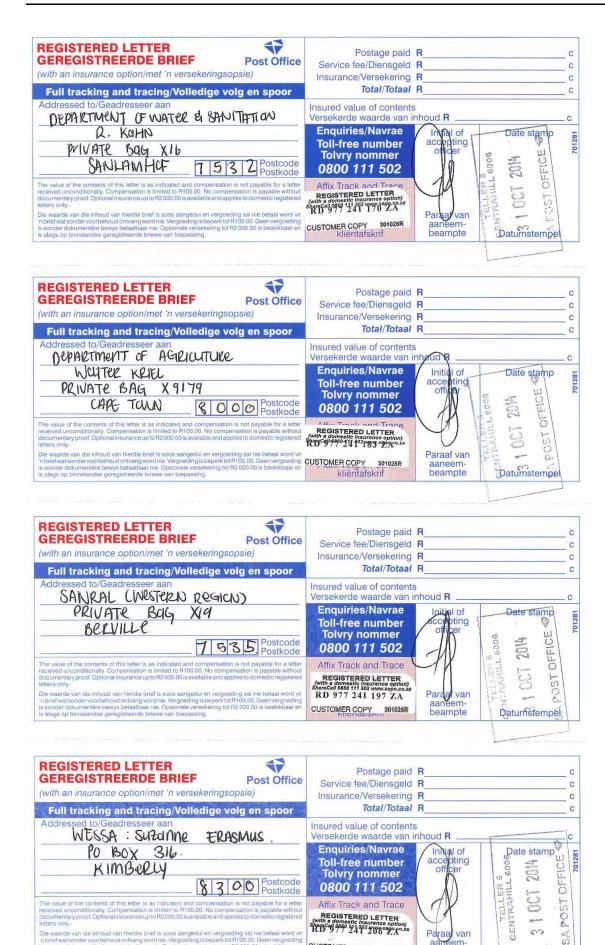
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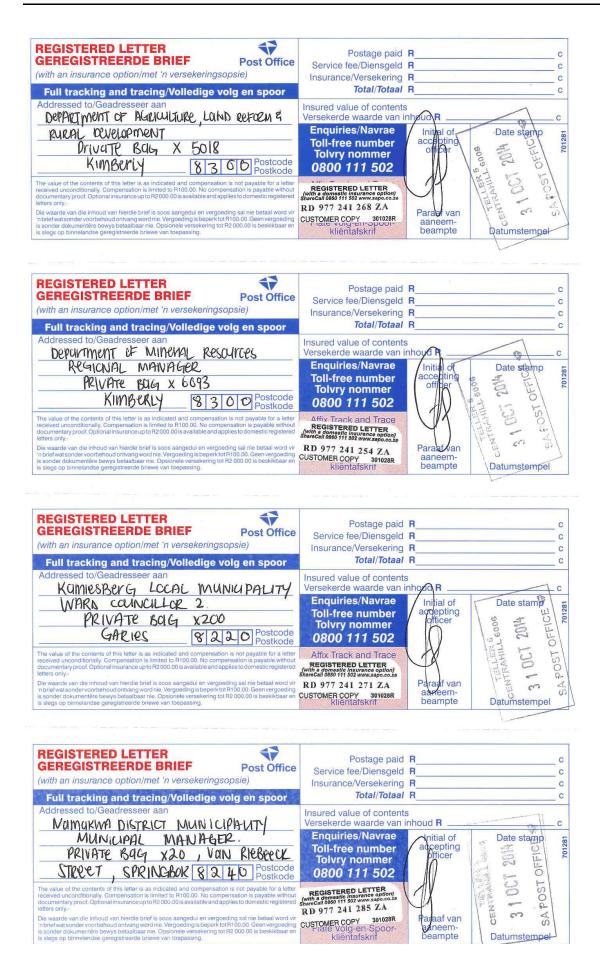
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APPENDIX G: LETTER FROM SANPARKS

Please note that the letter included below was received on the 3rd of September 2014, not on the 22nd of July as indicated. Please see e-mail correspondence below for confirmation.

From: Willem Louw [mailto:Willem.Louw@sanparks.org]
Sent: 03 September 2014 13:02
To: c.bezuidenhout@cesnet.co.za
Subject: Zirco mining right appliction

Dear Dr Bezuidenhout,

Further to our telephone discussion earlier today, Attached herewith please find preliminary comments from SANParks regarding the Kamieskroon Zirco Mining right application.

Kind regards

Willem

Willem J Louw

Manager: Park Planning and Development Conservation Services Division South African National Parks (SANParks) WJ Louw Building, 2nd Floor 7 Old Paarl Road BELLVILLE PO Box 440, SANLAMHOF, 7532 Tel 021 949-6414 Cell 083 640 5298 e-mail: willem.louw@sanparks.org To develop and manage a system of national parks that represents the biodiversity, landscapes, and associated heritage assets of South Africa for the sustainable use and benefit of all.



Tel: 021 949-6414

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			7532		bontebak
			22 July 2014		golden gate highlands
	Attention: D	r Chantel Bezuidenhout	t		karoo
	Coastal & Er	nvironmental Services			kgalagadi transfrontier
	67 African S	treet			knysna lake area
	Grahams to	vn 6039			kruger
	P.O. Box. 93	34			
	South Africa				mapungubwe
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	Re: Final So		sberg Project, Zirco Rood	e Heuvel	mountain zebra
		IAM/KAM/RLS1/2013			
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	-	t west of the town Kami	eskroon, which is 495 km no	orth of Cape	west coast
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643 Leyd	s Street	P.O. Box 787	Tel: 012 426-5000	central reservatio	ns: 012 428 9111

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reservations@sanparks.org www.sanparks.org

Page 2 of 6

The park is still in the process of development, with the coastal contractual area between the Groen and Spoeg rivers incorporated recently to expand the park to include more succulent habitats and a coastal section

WWF-SA, the National Parks Trust and De Beers Consolidated Mines are contractual partners in the park. In total, contractual land contribute 83,799.6 ha to the park. Although not yet declared, the park also manages the Admiralty Zone between the Groen and Spoeg Rivers.

The current area of the park totals 145,892.35 ha of which 110,964.2390 ha has been declared, with the rest in the process to be declared.

Please note the following:

- a) SANParks' legal mandate is to protect, control and manage National Parks and other defined protected areas and their biological diversity, (NEM:PAA 57 of 2003);
- b) SANParks manages Namaqua National Park in accordance of a management plan, approved by the National Minister of Environment and Water Affairs on 05-09-2013 in terms of sections 39 and 41 of NEM:PAA (Act 57 of 2003, including buffer zone of NNP.
- c) The proposed mining development falls within NNP core expansion and buffer Zone areas;

Biodiversity Policy and Strategy for South Africa: A Strategy on Buffer Zones for National Parks, (Government Gazette, 08 Feb 2012, No. 35020, (Notice no. 106 of 2012) :

As mentioned earlier in this letter, the proposed mining area falls within the expansion footprint and buffer zone of the Namaqua National Park. The purpose of a National Park buffer Zone is to:

 Protect the purpose and values of a national park, which is explicitly defined in the management plan, submitted in terms of sec 39(2) of the NEM:PAA;

Page 3 of 6

- The proposed mining development triggers the following provisions of the Buffer Zone Guidelines for National Parks:
 - Goal 3, which reads as follow: "Discourage development in areas in which biodiversity and ecological function would be adversely affected". <u>Mining</u> is listed as an activity, which has to be discouraged. However, it is not prohibited to mine in the buffer areas, but any development / mining activities in the buffer zone of a national park needs to be controlled by all three spheres of government. It seems that this development occurs within a natural priority and catchment protected area of the buffer zone of NNP.

"All developments in the buffer zone of a national park requiring an environmental authorisation ito NEMA, will be subject to an environmental impact assessment process on a national level", according to the Buffer Zone Policy. SANParks would like to suggest that the EAP informs DEA: Sensitive Environment section, about the proposed mining application in the buffer zone of NNP, in order for DEA to decide on the extent of their involvement in this matter. Please note that national park buffer zones, defined in the park management plans, will be considered special areas in terms of section 24(2)(b) of the National Environmental Management Act, 1998, (Act No.107 if 1998.

Mining and Biodiversity Guideline, 2013

The Mining and Biodiversity guidelines rate the proposed mining area as Category B, – highest risk for mining; extreme caution should therefore be exercised in all proposed mining activities - due to the very sensitive nature of the area, which:

- falls in a critical biodiversity areas(CBA);
- Is adjacent to a national park, (in buffer the buffer zone of NNP);
- · The presence of very sensitive aquifers in the proposed mining area

The guidelines further states that environmental authorisation may or may not be granted and that biodiversity offsets should be considered; however, strict limitation should be set and must be written into authorisations. SANParks fully supports the provisions and guidelines of the 2013 Mining and Biodiversity guidelines.

SANParks would like to urge the EAP and Competent Authority to take cognisance of this categorisation and the biodiversity significance of the mining site - if authorisation is granted, to set limits on the allowed activities and impacts. Furthermore, SANParks fully supports that the standard focus on the ecological aspects, values, principles and socio-economic and cultural values be adhered too; that the ecological mitigation hierarchy: avoidance, minimisation, rehabilitation and ecological offsets be followed.

Biodiversity offsets are measures taken to compensate for any residual significant, adverse impacts that cannot be avoided, minimised and or rehabilitated or restored, in order not to achieve no net loss or a net gain of biodiversity. We strongly recommend that this process be followed during the EIA phase. The Mining and Biodiversity Guidelines, Western Cape Offset Guidelines and SANBI Offset Guidelines provided clear guidance on this process. If it became clear that biodiversity offsets should be considered, then SANParks would like to be consulted in the appointment of an experience Biodiversity Offset Facilitator.

Biodiversity and Ecology

- (c) The area contains very special rare and endangered vegetation types the site is also listed by SKEP and Namaqualand District Municipality' SDF as priority and Critical Biodiversity Area or (CBA);
- (d) The Site is therefore of very high biodiversity value, and includes very important aquifers. SANParks is therefore rightly very concerned about possible groundwater contamination.
- (e) The impact of dust, noise generation, spread of alien species, loss of threatened species and habitats, possible decrease in natural beauty and aesthetics of the area should also be investigated.
- (f) Baseline water quality studies in affected areas;

Page 5 of 6

- (g) Ecological baseline studies in the Groen- and Spoeg Rivers;
- (h) A full scale vegetation survey considering plant species of special concern.
- SANParks encourage the applicant to do a full scale hydrological impact assessment including assessment of possible impacts of polluted water on the Namaqua National Park, local communities, farmers and tourism;
- (j) An socio-economic cost benefit assessment;
- (k) The impact of the desalination plant and its possible impact on natural surrounding areas.

As the responsible person dealing with development applications in buffer zones of national parks, I would like to request to be registered as I&AP on behalf of SANParks. Due to the fact that SANParks Planning & Development Division became so late aware of this mining right application, I would kindly request additional time in order to enable SANParks Scientific team to thoroughly comment on this application and in particular on the specialists reports.

I would like to request that all correspondence and reports regarding this mining application, including EIA specialist reports, which requires official SANParks commenting, should (in addition to the Park Manager, Mr Bernard van Lente), be addressed to: Willem Louw PO Box 440 SANLAMHOF

7532

SANParks reserves the right to revise initial comments based on additional information that may be received, additionally, to oppose the mining right application if these comments are ignored.

Yours faithfully

Page 6 of 6

Willem Louw

Manager: Conservation Planning and Development Conservation Services Division – (SANParks Buffer Zones) South African National Parks (SANParks)

CC:

Mr Bernard van Lente, Park Manager, NNP Mr Lucius Moolman, General Manager: Arid Region - SANParks Dr Mike Knight: Head Park Planning and Development Mr Danie Smit – Deputy Director Integrated Environmental Authorisations (Sensitive Environments), Department Environmental Affairs Mr Ishaan Abader: Deputy Director-General: Legal Authorisations, Compliance and Enforcements

The following letter was received from SANParks on the 9th of December 2014 in response to the Draft EIR. A comments and response trail based on this letter is available in Chapter 6, Table 6.9.

	system of national parks th and associated heritage ass d benefit of all.		2	
			South African National Parks	
		Tel: 021 949- Fax: 021 949- <u>willem.louw@</u> PO Box 440 SANLAMHOF 7532	6416 <u>sanparks.org</u>	addo elephant agulhas
		05 December	r 2014	augrobies falls
Attention:	Dr Chantel Bezuidenhou	t		bontebok
	nvironmental Services			golden gate highlands
67 African S Grahams to	wn 6039			karoo
P.O. Box. 9 South Africa				kgalagadi transfrontier
Re: Draft Projec	Environmental and ct, Namaqualand, Sout	Impact Assessment, ((E h, Reference Numbers:	IA) Kamiesberg	knysna lake area
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643 Leyds Street MUCKLENEUK 0002	P.O. Box 787 PRETORIA 0001	Tel: 012 426-5000	central reservations reservations@sanpa www.sanparks.org	

Page 2 of 13

(v) That negative impacts on the environment and on people's environmental rights are anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.

These provisions place an onus on development applicants and the responsible Environmental Assessment Practitioner to ensure that all impacts, including cumulative impacts, in an area do not exceed established thresholds, and that residual impacts are remedied.

Additionally, EIA regulations also place an obligation on the EAP and or person compiling specialist report to ensure that all aspects of impacts be taken into account, (see Section 17 of the EIA Regulation No. R .543, Government Gazette No.33306, dated 18 June 2010, for requirements and criteria for EAP's / specialists undertaking a specialised EIA process).

2. South African National Parks relevance to the request for comments.

The Namaqua National Park (NNP) was declared in 2001 (Government Notice 578 in Government Gazette 22414 dated 29 June 2001). The NNP is situated in the Namaqualand region of the Northern Cape Province of South Africa, and stretches from the Groen and Spoeg Rivers on the Atlantic Ocean to just west of the town Kamieskroon, which is 495 km north of Cape Town. The park is still in the process of development, with the coastal contractual area between the Groen and Spoeg rivers, incorporated recently to expand the park to include more succulent habitats and a coastal section.

The current area of the park totals 145,892.35 ha of which 110,964.2390 ha has been declared, with the rest in the process to be declared.

Please note the following:

- 2.1 SANParks' legal mandate is to protect, control and manage National Parks and other defined protected areas and their biological diversity, (NEM:PAA 57 of 2003);
- 2.2 SANParks manages Namaqua National Park in accordance of a management plan, approved by the National Minister of Environment and Water Affairs on 05-09-2013 in terms of sections 39 and 41 of NEM:PAA (Act 57 of 2003, including buffer zone of NNP.
- 2.3 Furthermore please note that protected areas are becoming our last remaining biophysical support systems, protecting key ecological infrastructure that serve as environmental 'lungs' and 'kidneys' and provide functions core to the future of life on the planet.
- 2.4 Protected areas are increasingly expected to fulfil multiple objectives, e.g. protecting our biophysical and cultural heritage, safeguarding ecosystem services through protection of key ecological infrastructure, buffering

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societies against the impacts of climate change, and contributing to regional stability and resilience. However, the protected area estate can only live up to these expected ideals if such areas are indeed protected.

- 3. SANParks strongly opposes the mine in its proposed form and considers the project to be fatally flawed for the following reasons:
- 3.1 Project alternatives no fundamental project alternatives were considered which constitutes a fatal flaw for this project. It is standard practice to consider the following project alternatives, (close proximity of Namaqua National Park, the fact that the minerals to be exploited are not classified as strategic minerals and the sensitivity of the area, make this requirement even more urgent):
 - I) land use alternatives;
 - II) The No-Go option
- 3.2 The proposed mining development falls within NNP core expansion and buffer Zone areas, and also within the default 10km buffer area as provided for in Listing Notice 3 of the 2010 NEMA EIA Regulations.
- 3.3 The Biodiversity Policy and Strategy for South Africa: A Strategy on Buffer Zones for National Parks, (Government Gazette, 08 Feb 2012, No. 35020, (Notice no. 106 of 2012), provides that mining applications in buffer areas of national parks should be discourage because of its adverse effect on biodiversity and ecological functioning of these areas.
- 3.4 Additionally, the Mining and Biodiversity Guideline, 2013 guidelines rate the proposed mining area as *Category B highest risk for mining and biodiversity importance*, due to the very sensitive nature of the area proposed as mining site, which:
 - 3.4.1 Falls within a critical biodiversity area (CBA). The area contains very special rare and endangered vegetation types. The site is listed by SKEP and Namaqualand District Municipality' SDF as a priority and Critical Biodiversity Area;
 - 3.4.2 Includes the presence of very sensitive aquifers in the proposed mining area – which mining activities could severely impact on the purpose and values of NNP.
- 3.5 Sabies area is mentioned / included in this draft EIA, while this specific area is still subject to provisions of the M&PRDA, (Mineral and Petroleum Resources Development Act, 28 of 2002), for purposes of prospecting licence application.
- 3.6 The EIA does not discuss the value of the heavy minerals, in terms of its national importance for the country, or whether it is classified as Strategic Minerals and in national interest. In fact, the minerals proposed to be exploited, *is not classified as Strategic Minerals*, which further make this mining right application, even more problematic.

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- 3.7 Cumulative impacts has not been taken into account or properly mitigated. Cumulative impacts are those impacts from the project combined with the impacts from past, existing and reasonably foreseeable future projects that would affect the same biodiversity or natural resources collectively. In this instance, cumulative impacts would include infrastructures to be constructed in addition to the mining and associated infrastructure (mineral separation plant, primary concentrator plant, tailings dam, offices, workshops and stores etc. Furthermore, it would also include the construction of various ancillary infrastructure such as:
 - 3.7.1 Seawater intake, desalination plant, pumping station and pipeline
 - 3.7.2 Waste water treatment works
 - 3.7.3 Product transfer stations
 - 3.7.4 Airstrip
 - 3.7.5 Upgrade of the provincial road to and junction with the N7 road
 - 3.7.6 Fuel Depot
 - 3.7.7 Construction and operation accommodation

4 Specific comment on the Specialists assessments.

4.1 Surface and groundwater assessment

The surface water assessment conducted by the Coastal & Environmental Services (October, 2014) provides a useful collation of the relatively sparse information on the rivers and estuaries of the study area. Their respective assessments of potential impacts on surface water related to (a) the tailings storage facility, (b) groundwater abstraction, and (c) river crossing infrastructure are particularly informative. As is common for arid areas, surface water quantity and quality in the study area are largely moderated through a groundwater contribution. The uncertainty related to, and risk associated with groundwater contamination, as a result of the Kamiesberg project is *significant*. The overall risk is further increased due to the long time-frame at which groundwater contamination plays out.

The saline plume from the Tailings and storage facility will result in an increase in salinity at the top of the Groen estuary. The Groen estuary is a B rated estuary and is considered an endangered environment (National Biodiversity Assessment 2011, SANBI). This naturally saline system is fed by groundwater of lower salinity which ensures the functionality of the estuary; once this source increases in salinity the estuary will lose ecological viability. This impact is unacceptable for an endangered environment within a National Park. A full estuarine impact study is required to determine these impacts.

4.2 Groundwater assessment

Approximately 33 000 cumecs per day of sea water will be piped to the site. As far as we can tell only a trivial amount of this is desalinated, and the vast bulk is used directly in the mining process, and is essentially disposed of with the backfill or in the unlined tailings/slimes dam.

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Assuming that the normal 35g/litre salt concentration, SANParks calculated 1155 tons of salt a day, being moved on site.

The density effects of saline water, which will cause the sea water to move downwards at a faster rate, was not modelled in the groundwater study. Furthermore, the groundwater study does not have sufficient climate/ rainfall data, making it impossible to model the hydrology of the area.

The groundwater study does not take in evaporative losses, which must surely increase the salt concentrations in the soil and groundwater. A concern for SANParks is that, why in such an arid area, the modelled salinity of the groundwater would be less saline than the sea water being introduced to the site in large quantities.

The groundwater study indicates that water with raised salinity reaches a number of boreholes on the Groenrivier, and it seems reasonable to assume that any extra saline water entering the estuary will increase estuary salinity overall, even if it does enter via the Groenrivier. The logic of the study cannot be followed, saying that the saline groundwater impacts the top end of the Groenrivier, but not the Groenrivier outside the mine site. This appears to be hydrologically not sensible. Furthermore, the groundwater modelling scenarios are insufficient as the most important variables are omitted from the model. Omitting these variables from the groundwater model essentially renders the analysis as useless. The simulated salts concentrations from seawater and processed mine water seepage from backfill voids into the groundwater will pollute the system with hyper saline water for the next > 100yrs.

In the absence of comprehensive integrated monitoring or long –term rehabilitation plan for essentially the next > 100yrs, apart from the environmental impacts. SANParks is concerned that that the local population's socio-economic and cultural (livestock farming) aspects will be complete destroyed as a result of the groundwater contamination and abstraction.

Furthermore, the estuary seems to receive "fresher" groundwater, which should prevent the system from becoming totally hypersaline. It appears that this source of fresher water is at risk. It appears unreasonable for the groundwater study to write–off impacts of the saline water on the estuary, as the timelines for the impacts are such that the concentrations at the certain sites are still rising 100 years after mining.

A concern for SANParks is the plan to properly rehabilitate the area, given the extremely high concentration of salt added to it. It seems that we are starting to look at a long term toxic desert, with risk to broader areas through salt being blown off exposed landscapes. Certainly, the tailings dam is going to be highly saline.

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Recommendations for groundwater impacts

Lining the back fill voids with impervious material and considering modern treatment processes, to mitigate the groundwater impacts.

A full estuarine study on the impacts of loss of dilution and increased salt inputs into the system needs to be conducted – this is a very rare estuarine type and risks cannot be taken when considering its protection.

4.3 Air Quality Assessment:

The specialist study found that all air quality matters were within legal requirements in the short-term. We question what the long-term impact of the sulphur dioxide and nitrogen dioxide deposition will be, as this is what SANParks and the surrounding communities are going to have to deal with.

4.4 Faunal assessment:

The faunal assessment states that there are no threatened or endemic amphibians in this area. This is incorrect as, *Stongylopus springbokensis* and *Breviceps macrops*, are both listed as Vulnerable along the coast, the latter occurring in the coastal dunes on the Namaqualand coast. Researchers are currently conducting a survey to locate populations of both these species in Namaqua National Park - preliminary results indicate that the habitats are suitable and these species should be present.

Commercial exploitation of all reptile species does occur in this area and the establishment of the mine, with the influx of people may result in more illegal poaching of reptiles for trade. To state that NNP protects these species so no measures need to be put in place at the mine is ludicrous (Point 9.2 number 5, pg. 80)! According to SKEP, a number of amphibian, reptile, bird and mammals species of conservation concern, occur within the mining area and will all be negatively affected by the operations of the mine.

There are no recommendations that mining staff be prohibited from killing or trapping animals for meat. This should be included in the report.

The suggested 2km buffer/ecological corridor is insufficient given the edge effects of the mine will in all likelihood be 50% of this area already (1km), the mining and biodiversity guidelines recommend 5km. Under pollution and contamination, the report does not note the effects of salt on the water systems, and the impact this will have on the amphibian and bird species living in the riverine and wetland areas.

Due to the occurrence of a threatened bat species at the mining site, night operations and excessive lights should be added to the list of recommendations.

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The protected area expansion strategy is mentioned as not relevant to this project in the faunal survey as the mine is 5km from the expansion footprint. This is incorrect, as the mine borders on the park within the future expansion area of NNP.

4.5 Vegetation assessment:

The mining site cuts directly through a large north-south portion of Namaqua Sand Fynbos. This vegetation type is highly dependent on acid pH levels and will be severely impacted by the mine operations, as well as the resultant increase in salinity from the use of sea water. Rehabilitation of this vegetation type back to Sand Fynbos will not be possible as suggested by the report. This vegetation type will be lost as the more saline tolerant Strandveld vegetation will take the place of the Sand Fynbos. Sand Fynbos is the richest of the vegetation types found in the mining area, and particularly on the ecotone between the Strandveld and Sand Fynbos. The impact to these will be severe and no amount of translocation or restoration will ensure their survival.

Although all the vegetation types within the mining area are listed as 'Least Concern' none of them have met the national conservation target of between 26-28% conserved. To reply merely on NNP to conserve these vegetation types is unrealistic, as ecosystems function on a landscape scale, and this mine will severely impact the conservation of large intact portions of vegetation types (point 4.1, pg 19). This is the second largest intact portion of Sand Fynbos remaining in Namaqua National Park, (pg 25).

The heuweljieveld in this area is also particularly rich in species and 2 new species were found in this assessment. The potential loss of known and unknown species, should the mine go ahead, is a serious concern (pg 21).

The coastal dune areas are poorly botanised, however historic records indicate that these are fragile systems and that rare and threatened species occur in small clumped populations. The building of the desalination plant here could potentially result in the loss of these populations.

SANParks experience in the translocation of plants to other areas in the arid environment has found that they do not transplant well and up to 100% died in the first year. This recommendation should be re-written and the plants should be kept ex situ in a nursery (preferably a Botanic Garden), and used as 'mother stock' to propagate new plants to be used in the rehabilitation of post-mined areas (given that they soils are not overly saline).

SANParks strongly recommends the following:

The recommended 300m ecological corridor through the mine site should be made larger (500m) should the mine proceed. (pg76). Identified habitat corridors and other sensitive areas need to be secured for conservation in perpetuity through an appropriate

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stewardship mechanism. An environmental management plan needs to be prepared for these areas, and appropriate resources allocated to ensure that they are well managed. This should include sufficient fencing (or other control of these areas) to ensure they are appropriately demarcated and managed.3

4.6 Rehabilitation assessment

The report states that the high salinity of the soils from the mining plant is leached after 25 months and able to be rehabilitated. I question what the salt content of this soil was and the rainfall in the area that was tested, and then how this compares to the Khamiesberg mine project site (pg 13). The rehab of the mined areas will lag 2 years behind the mining operations (pg 19); however seeds in topsoil do not last longer than 12 months. Thus, the plan needs to consider collecting seed and sowing this onto the first sites to be rehabilitated post-mining. Thereafter, topsoil should not be stored longer than 12 months, it should preferably be moved directly onto an old mine site from a newly opened cut.

4.7 Heritage assessment

The recommended buffer around quartz outcrops of 5m should be increased as these areas are also rich in flora and 5m will not protect the outcrop.

4.8 Waste assessment:

The location for the proposed landfill site has yet to be determined, this must be informed by the ground water and vegetation assessments and provided to stakeholders for comment.

The report states that liquid waste produces of the desalination process will be discharged into the ocean. We have not seen an impact assessment of what this discharge may do.

4.9 The visual impact

The visual impact of the 27m high tailings dump in this flat landscape will be an eyesore. The visual assessment is implying it's not important to SANParks because it will not be seen from the coastal camps. It will however, be seen from almost anywhere else in the park once you move away from the coast. The apparent assumption that these areas are not used by people/ visitors is also incorrect - we could very well have horse trails, 4x4 trails etc. there in future.

4.10 Social and labour plan (SLP)

The Social and Labour Plan seems to be meeting all the legal requirements and is within the format required by the DMR. However, one cannot really get a sense of the anticipated turnover and /or projected profitability of the Mine, except in the SLP and

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ESP an indication that 270 Million tons of sand will be mined from 3,500ha over the 20 year life-span of the Mine. The Mine has committed

R 15 M to the SLP over the first 5-years of the life-span of the Mine. Unfortunately one cannot assess how reasonable an offer this is given the lack of information.

In terms of the current LED projects identified:

4.10.1 The projects are only infrastructure focused – DMR also encourages skills development and income generation projects.

The municipality is a small rural municipality and probably rightfully places emphasis on basic service delivery and bulk infrastructure and water is a priority concern. However, whilst the Mine will cover the capital costs the municipality will have to cover the operations and maintenance costs and this must be factored into the socio-economic impact and "off-set" calculations;

4.10.2 Whether these LED projects are sufficient to mitigate the socio-economic and environmental impact on the Mine is, however, questionable. *The anticipated socio-economic impact of the Mine is significant*, e.g.

4.10.3 Newcomers, especially job-seekers, will be attracted into the area.

4.10.4 The municipality will need to deliver services and housing to these newcomers.

4.10.5 A significant number of jobs to be created will be short-term and construction related in the first few years of the Mine's operations. These workers will be sourced through construction companies that will probably source unskilled and semi-skilled workers locally. There future is uncertain and may contribute to growing unemployment and associated social problems within the community.

4.10.6 The long-term production jobs in the Mine will last 20 years. Economic activity within the community is limited so chances of employment within other sectors are scarce unless alternative forms of economic activity are stimulated during the life of the Mine.

4.10.7 The local municipality has no budget (Namakwa IDP 2012 – 2016) to finance LED projects (its focus is necessarily basic service provision) so requires private sector partners to come on board in that regard.

4.10.8 Conservation has not been specifically identified either by the municipality in its IDP or the Mine's SLP as a specific economic sector or an area of sustainable job creation. The sectors identified for growth are Tourism, Renewable Energy and Mariculture. However, they could be regarded as

relatively compatible with conservation and could be linked to biodiversity and heritage protection. It is interesting to note that:

- 4.1.8.1. Both the Namakwa and Kamiesberg Municipalities note the biodiversity significance of their vegetation and their coastlines and the degradation thereof. Alien invasive vegetation and mining activities are causal factors identified for this degradation;
- 4.1.8.2 The Mine's proposed LED contribution does not correlate with the potential negative socio-economic impact of the Mine;
- 4.1.8.3 The SLP does not address broader environmental and biodiversity concerns within the community as its plans are focused on the Mine's operations and rehabilitation objectives.
- 4.1.8.4 We propose that the first 5-year projects are focused on basic service delivery, but we strongly argue that the Mine also has a social and corporate responsibility to promote alternative economic activity, and opportunities within their area of operation, in order to address the future opportunities of their workforce. In the case of the Kamiesberg Project, this is urgent, given the fact that the construction jobs to be created will be relatively shortterm. The Mine also has a responsibility to contribute to biodiversity conservation within its broader environment.
- 4.1.8.5 We propose that to meet these imperatives, an additional project in the SLP could be on "Green Job Creation". These projects would be aligned to the Namakwa District's IDP where a number of these projects are already listed as indicated.
- 4.1.8.6 We propose the supporting of a "<u>National Green Trust</u>" that would operate within National Park Buffer Zones and Protected Areas that focus on:
 - 4.10.8.6.1. Building capabilities required for monitoring of mining activities through research and bursary opportunities;
 - 4.10.8.6.2. Promoting conservation as a key sector for rural economic development and job creation through building capabilities to:
 - Undertake socio-economic analyses of Buffer Zones, their broader regional economies, and conservation-linked economic opportunity;
 - Facilitate stakeholder engagement processes within Buffer Zone

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- Facilitate the extension of protected areas through private and public led initiatives and partnerships;
- Input into Mining
- Input into Municipality Spatial development Frameworks, Integrated Development Plans and LED Strategies; and promote Green Job Creation.

5 SANParks REQUIRES THE FOLLOWING STUDIES TO BE DONE

5.1 A Full Economic evaluation study

Given the very high biodiversity importance of the proposed mining area, SANParks request that a full economic evaluation study be done.

A full economic valuation of the proposed Kamiesberg mining operation compared with other reasonable/feasible alternative land uses, undertaken as a necessary component of the EIA, would determine whether mining would be the optimum sustainable land use in the proposed mining area. The economic valuation should ideally addresses the values of biodiversity and ecosystem services that conventional economic analysis excludes, since their value is not traded or priced in the marketplace.

A full economic valuation may show that the value of the intact ecosystem to local communities and society exceeds the value of mining as the new proposed land use. Furthermore, this will reflect both the economic loss that results when biodiversity is degraded or lost, as well as the value gained from conserving the resource. The economic evaluation needs to clearly show whether it would in the national interest to exploit these minerals. Furthermore, the study would also assess whether other alternative deposits or reserves exist, which could be exploited in areas, which are not biodiversity priority areas or less environmentally sensitive areas.

5.2 A full estuarine study

A full estuarine study on the impacts of loss of dilution and increased salt inputs into the system needs to be conducted – this is a very rare estuarine type and risks cannot be taken when considering its protection.

5.3 A full tourism impact study

Given the importance of tourism for NNP, SANParks request that a full tourism impact study, in terms of the potential impacts on tourism opportunities in the park, be undertaken. The park is heavily dependent on its sense of place, and it appears that the tailings facility will be visible across much of the park. Furthermore, the increased traffic and other mining activities on the road to the Groen River mouth, could significantly impact on tourism in this area.

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5.3 A full peer review

Given the very high biodiversity importance of the proposed 3,500ha mining footprint, rated as *Category* **B** (highest risk for mining and biodiversity importance), within the buffer zone of NNP. SANParks are of the opinion that a full review of the Environmental Impact Assessment (EIA) is justified and that this review be performed by suitably qualified professional.

6 DEA involvement

SANParks strongly request the involvent of the DEA on a national level in this project. Goal 3 of the Biodiversity Policy and strategy for South Africa: Strategy on Buffer Zones for National Parks, p.15, stated as follow: "All developments in the buffer zone of a national park requiring an environmental authorisation ito NEMA, will be subject to an environmental impact assessment process on a national level". SANParks would like to suggest that the EAP informs DEA: Sensitive Environment section, about the proposed mining application in the buffer zone of NNP, in order for DEA to decide on the extent of their involvement in this matter.

7 Biodiversity offsets

With regards to the EAP's recommendation that discussions with SANParks will be held in respect of biodiversity offsets, the following:

Biodiversity offsets are measures taken to compensate for any residual significant, adverse impacts that cannot be avoided, minimised or rehabilitated or restored, in order not to achieve no net loss or a net gain of biodiversity. The Mining and Biodiversity Guidelines, Western Cape Offset Guidelines and SANBI Draft Biodiversity Offset Guidelines provide clear guidance on the process to be followed concerning a Biodiversity offset process.

If it became clear that a biodiversity offsets should be considered and should an environmental authorisation be granted *then SANParks Strongly recommends that an experience Biodiversity Offset Facilitator in consultation with SANParks, be appointed, to scientifically calculate and design the biodiversity offset in terms of the Western Cape and SANBI Offset guidelines.*

Furthermore, the Biodiversity Offset Report should form part of the Environmental Impact Assessment Report (EIAR) and its recommendations should be included as conditions of the Environmental Authorisation.

SANParks reserves the right to revise these comments based on additional information that may be received, additionally, to oppose the mining right application if these comments are ignored.

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Yours faithfully

Willem Louw Manager: Conservation Planning and Development South African National Parks (SANParks)

CC:

Mr Bernard van Lente, Park Manager, NNP Mr Lucius Moolman, General Manager: Arid Region - SANParks Dr Mike Knight: Head Park Planning and Development Mr Danie Smit – Deputy Director Integrated Environmental Authorisations (Sensitive Environments), Department Environmental Affairs; Mr Ishaan Abader: Deputy Director-General: Legal Authorisations, Compliance and Enforcements Ms O. Ndzumo – the DENC

The following letter was received from SANParks on the 4th of December 2014 in response to the Draft EMPr. A comments and response trail based on this letter is available in Chapter 6, Table 6.9.

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2. Legal Context

NEMA Section 2 (4) (a) requires inter alia that "Sustainable development requires the consideration of all relevant factors including the following:

 (i) That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied;

(ii) That the disturbance of landscapes and sites that constitute the nation's cultural heritage is avoided, or where it cannot be altogether avoided, is minimized and remedied;

(iii) That the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level beyond which their integrity is jeopardised;

(iv) That a risk-averse and cautious approach is applied, which takes into account the limits of current knowledge about the consequences of decisions and actions; and

(v) That negative impacts on the environment and on people's environmental rights are anticipated and prevented, and where they cannot be altogether prevented, are minimised and remedied.

These provisions place an onus on development applicants and the responsible Environmental Assessment Practitioner to ensure that all impacts, including cumulative impacts, in an area do not exceed established thresholds, and that residual impacts are remedied.

Additionally, EIA regulations also place an obligation on the EAP and or person compiling specialist report to ensure that all aspects of impacts be taken into account, (see Section 17 of the EIA Regulation No. R .543, Government Gazette No.33306, dated 18 June 2010, for requirements and criteria for EAP's / specialists undertaking a specialised EIA process).

3. South African National Parks relevance to this request for comments.

The Namaqua National Park (NNP) was declared in 2001 (Government Notice 578 in Government Gazette 22414 dated 29 June 2001). The NNP is situated in the Namaqualand region of the Northern Cape Province of South Africa, and stretches from the Groen and Spoeg Rivers on the Atlantic Ocean to just west of the town Kamieskroon, which is 495 km north of Cape Town. The park is still in the process of development, with the coastal contractual area between the Groen and Spoeg rivers, incorporated recently to expand the park to include more succulent habitats and a coastal section.

The current area of the park totals 145,892.35 ha of which 110,964.2390 ha has been declared, with the rest in the process to be declared.

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Please note the following:

- a) SANParks' legal mandate is to protect, control and manage National Parks and other defined protected areas and their biological diversity, (NEM:PAA 57 of 2003);
- b) SANParks manages Namaqua National Park in accordance of a management plan, approved by the National Minister of Environment and Water Affairs on 05-09-2013 in terms of sections 39 and 41 of NEM:PAA (Act 57 of 2003, including buffer zone of NNP.
- c) Furthermore please note that protected areas are becoming our last remaining biophysical support systems, protecting key ecological infrastructure that serve as environmental 'lungs' and 'kidneys' and provide functions core to the future of life on the planet.
- d) Protected areas are increasingly expected to fulfil multiple objectives, e.g. protecting our biophysical and cultural heritage, safeguarding ecosystem services through protection of key ecological infrastructure, buffering societies against the impacts of climate change, and contributing to regional stability and resilience. However, the protected area estate can only live up to these expected ideals if such areas are indeed protected.

4. SANParks strongly opposes the mine in its proposed form and considers the project to be fatally flawed for the following reasons:

- a. Project alternatives no project alternatives were considered which constitutes a fatal flaw. It is standard practice to consider (some) of the following project alternatives, the close proximity of Namaqua National Park, make this requirement even more urgent:
 - I) land use alternatives;
 - II) Mining method alternatives
 - III) Product handling and transport alternatives
 - IV) Access alternatives
 - V) Mine power alternatives
 - VI) Location of RDP's
 - VII) The No-Go option
- b. The ESMPr does not provide an indication or proof of financial provision for remediation of environmental damage. To state that, "the proponent will be responsible for ensuring that sufficient financial resources are made available for the effective implementation of the requirements of this ESMP.", is inadequate and constitutes non-compliance of Section 41(1) of MPRDA. I&AP are supposed to comment on the financial provision for this mining application.
- c. The proposed mining development falls within NNP core expansion and buffer Zone areas, and also within the default 10km buffer area as provided for in Listing Notice 3 of the 2010 NEMA EIA Regulations.

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- d. The Biodiversity Policy and Strategy for South Africa: A Strategy on Buffer Zones for National Parks, (Government Gazette, 08 Feb 2012, No. 35020, (Notice no. 106 of 2012), provides that mining applications in buffer areas of national parks should be discourage because of its adverse effect on biodiversity and ecological functioning of these areas.
- e. Additionally, the Mining and Biodiversity Guideline, 2013 guidelines rate the proposed mining area as *Category B – highest risk for mining and biodiversity importance*, due to the very sensitive nature of the area proposed as mining site, which:
 - Falls within a critical biodiversity area (CBA). The area contains very special rare and endangered vegetation types. The site is listed by SKEP and Namaqualand District Municipality' SDF as a priority and Critical Biodiversity Area.
 - Includes the presence of very sensitive aquifers in the proposed mining area – which mining activities could severely impact on the purpose and values of NNP. This constitutes a fatal flaw for this mining right application.
- f. Sabies area is mentioned / included in this ESMPr, while this specific area is still subject to provisions of the M&PRDA, (Mineral and Petroleum Resources Development Act, 28 of 2002), for purposes of prospecting licence application.
- g. The ESMPr did not discuss the value of minerals, in terms of its national importance for the country, or whether it is classified as Strategic minerals and in national interest. In fact, the minerals proposed to be exploited, is not classified as Strategic Minerals, which further make this mining right application, even more problematic.
- h. Cumulative impacts has not been taken into account or properly mitigated. Cumulative impacts are those impacts from the project combined with the impacts from past, existing and reasonably foreseeable future projects that would affect the same biodiversity or natural resources collectively. In this instance, cumulative impacts would include infrastructures to be constructed in addition to the mining and associated infrastructure (mineral separation plant, primary concentrator plant, tailings dam, offices, workshops and stores etc. Furthermore, it would also include the construction of various ancillary infrastructure such as:
 - I) Seawater intake, desalination plant, pumping station and pipeline
 - II) Waste water treatment works
 - III) Product transfer stations
 - IV) Airstrip
 - V) Upgrade of the provincial road to and junction with the N7 road
 - VI) Fuel Depot
 - VII) Construction and operation accommodation

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5. Specific comment on the Specialists assessments.

a. Surface and groundwater assessment

The surface water assessment conducted by the Coastal & Environmental Services (October, 2014) provides a useful collation of the relatively sparse information on the rivers and estuaries of the study area. Their respective assessments of potential impacts on surface water related to (a) the tailings storage facility, (b) groundwater abstraction, and (c) river crossing infrastructure are particularly informative. As is common for arid areas, surface water quantity and quality in the study area are largely moderated through a groundwater contribution. The uncertainty related to, and risk associated with groundwater contamination, as a result of the Kamiesberg project is *significant*. The overall risk is further increased due to the long time-frame at which groundwater contamination plays out.

The saline plume from the Tailings and storage facility will result in an increase in salinity at the top of the Groen estuary. The Groen estuary is a B rated estuary and is considered an endangered environment (National Biodiversity Assessment 2011, SANBI). This naturally saline system is fed by groundwater of lower salinity which ensures the functionality of the estuary; once this source increases in salinity the estuary will lose ecological viability. This is impact is unacceptable for an endangered environment within an National Park. A full estuarine impact study is required to determine these impacts.

b. Groundwater assessment

Approximately 33 000 cumecs per day of sea water will be piped to the site. As far as we can tell only a trivial amount of this is desalinated, and the vast bulk is used directly in the mining process, and is essentially disposed of with the backfill or in the unlined tailings/slimes dam.

Assuming that the normal 35g/litre salt concentration, SANParks calculated 1155 tons of salt a day being moved on site.

The density effects of saline water, which will cause the sea water to move downwards at a faster rate, was not modelled in the groundwater study. Furthermore, the groundwater study does not have sufficient climate/ rainfall data, making it impossible to model the hydrology of the area.

The groundwater study does not take in evaporative losses, which must surely increase the salt concentrations in the soil and groundwater. A concern for SANParks is that, why in such an arid area, the modelled salinity of the groundwater would be less saline than the sea water being introduced to the site in large quantities.

The groundwater study indicates that water with raised salinity reaches a number of boreholes on the Groenrivier, and it seems reasonable to assume that any extra saline water entering the estuary will increase estuary salinity overall, even if it does enter via the Groenrivier. The logic of the study cannot be followed, saying that the saline

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groundwater impacts the top end of the Groenrivier, but not the Groenrivier outside the mine site. This appears to be hydrologically not sensible. Furthermore, the groundwater modelling scenarios are insufficient as the most important variables are omitted from the model. Omitting these variables from the groundwater model essentially renders the analysis as useless. The simulated salts concentrations from seawater and processed mine water seepage from backfill voids into the groundwater will pollute the system with hyper saline water for the next > 100yrs.

In the absence of comprehensive integrated monitoring or long –term rehabilitation plan for essentially the next > 100yrs, apart from the environmental impacts - SANParks is concerned that that the local population's socio-economic and cultural (livestock farming) aspects will be complete destroyed as a result of the groundwater contamination and abstraction.

Furthermore, the estuary seems to receive "fresher" groundwater, which should prevent the system from becoming totally hypersaline. It appears that this source of fresher water is at risk. It appears unreasonable for the groundwater study to write–off impacts of the saline water on the estuary, as the timelines for the impacts are such that the concentrations at the certain sites are still rising 100 years after mining.

A concern for SANParks is the plan to properly rehabilitate the area given the extremely high concentration of salt added to it. It seems that we are starting to look at a long term toxic desert, with risk to broader areas through salt being blown off exposed landscapes. Certainly, the tailings dam is going to be highly saline.

Recommendations for groundwater impacts

Lining the back fill voids with impervious material and considering modern treatment processes, to mitigate the groundwater impacts.

A full estuarine study on the impacts of loss of dilution and increased salt inputs into the system needs to be conducted – this is a very rare estuarine type and risks cannot be taken when considering its protection.

c. *Air Quality Assessment:* The specialist study found that all air quality matters were within legal requirements in the short-term. We question what the long-term impact of the sulphur dioxide and nitrogen dioxide deposition will be, as this is what SANParks and the surrounding communities are going to have to deal with.

d. *Faunal assessment*: The faunal assessment states that there are no threatened or endemic amphibians in this area. This is incorrect as, *Stongylopus springbokensis* and *Breviceps macrops*, are both listed as Vulnerable along the coast, the latter occurring in the coastal dunes on the Namaqualand coast. Researchers are currently conducting a survey to locate populations of both these species in Namaqua National Park - preliminary results indicate that the habitats are suitable and these species should be present.

Commercial exploration of all reptile species does occur in this area and the establishment of the mine, with the influx of people may result in more illegal poaching

of reptiles for trade. To state that NNP protects these species so no measures need to be put in place at the mine is ludicrous (Point 9.2 number 5, pg 80)! According to SKEP, a number of amphibian, reptile, bird and mammals species of conservation concern, occur within the mining area and will all be negatively affected by the operations of the mine.

There are no recommendations that mining staff be prohibited from killing or trapping animals for meat. This should be included in the report.

The suggested 2km buffer/ecological corridor is insufficient given the edge effects of the mine will in all likelihood be 50% of this area already (1km), the mining and biodiversity guidelines recommend 5km. Under pollution and contamination, the report does not note the effects of salt on the water systems, and the impact this will have on the amphibian and bird species living in the riverine and wetland areas.

Due to the occurrence of a threatened bat species at the mining site, night operations and excessive lights should be added to the list of recommendations.

The protected area expansion strategy is mentioned as not relevant to this project in the faunal survey as the mine is 5km from the expansion footprint. This is incorrect, as the mine borders on the park within the future expansion area of NNP.

3.5 Vegetation assessment: The mining site cuts directly through a large north-south portion of Namaqua Sand Fynbos. This vegetation type is highly dependent on acid pH levels and will be severely impacted by the mine operations, as well as the resultant increase in salinity from the use of sea water. Rehabilitation of this vegetation type back to Sand Fynbos will not be possible as suggested by the report. This vegetation type will be lost as the more saline tolerant Strandveld vegetation will take the place of the Sand Fynbos. Sand Fynbos is the richest of the vegetation types found in the mining area, and particularly on the ecotone between the Strandveld and Sand Fynbos. The impact to these will be severe and no amount of translocation or restoration will ensure their survival.

Although all the vegetation types within the mining area are listed as 'Least Concern' none of them have met the national conservation target of between 26-28% conserved. To reply merely on NNP to conserve these vegetation types is unrealistic, as ecosystems function on a landscape scale, and this mine will severely impact the conservation of large intact portions of vegetation types (point 4.1, pg 19). This is the second largest intact portion of Sand Fynbos remaining in Namaqua National Park, (pg 25).

The heuweljieveld in this area is also particularly rich in species and 2 new species were found in this assessment. The potential loss of known and unknown species, should the mine go ahead, is a serious concern (pg 21).

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The coastal dune areas are poorly botanised, however historic records indicate that these are fragile systems and that rare and threatened species occur in small clumped populations. The building of the desalination plant here could potentially result in the loss of these populations.

SANParks experience in the translocation of plants to other areas in the arid environment has found that they do not transplant well and up to 100% died in the first year. This recommendation should be re-written and the plants should be kept ex situ in a nursery (preferably a Botanic Garden), and used as 'mother stock' to propagate new plants to be used in the rehabilitation of post-mined areas (given that they soils are not overly saline).

The recommended 300m ecological corridor through the mine site should be made larger (500m) should the mine proceed. (pg76).

e. *Rehabilitation assessment* - The report states that the high salinity of the soils from the mining plant is leached after 25 months and able to be rehabilitated. I question what the salt content of this soil was and the rainfall in the area that was tested, and then how this compares to the Khamiesberg mine project site (pg 13). The rehab of the mined areas will lag 2 years behind the mining operations (pg 19); however seeds in topsoil do not last longer than 12 months. Thus, the plan needs to consider collecting seed and sowing this onto the first sites to be rehabilitated post-mining. Thereafter, topsoil should not be stored longer than 12 months, it should preferably be moved directly onto an old mine site from a newly opened cut.

f. *Heritage assessment:* the recommended buffer around quartz outcrops of 5m should be increased as these areas are also rich in flora and 5m will not protect the outcrop.

g. *Waste assessment:* The location for the proposed landfill site has yet to be determined, this must be informed by the ground water and vegetation assessments and provided to stakeholders for comment.

The report states that liquid waste produces of the desalination process will be discharged into the ocean. We have not seen an impact assessment of what this discharge may do.

The visual impact of the 27m high tailings dump in this flat landscape will be an eyesore. The visual assessment is implying it's not important to SANParks because it will not be seen from the coastal camps. It will however, be seen from almost anywhere else in the park once you move away from the coast. The apparent assumption that these areas are not used by people/ visitors is also incorrect - we could very well have horse trails, 4x4 trails etc. there in future.

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h. Social and labour plan (SLP) The Social and Labour Plan seems to be meeting all the legal requirements and is within the format required by the DMR. However, one cannot really get a sense of the anticipated turnover and /or projected profitability of the Mine, except in the SLP and ESP an indication that 270 Million tons of sand will be mined from 3,500ha over the 20 year life-span of the Mine. The Mine has committed

i. R 15 M to the SLP over the first 5-years of the life-span of the Mine. Unfortunately one cannot assess how reasonable an offer this is given the lack of information.

In terms of the current LED projects identified:

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2.8.1 The projects are only infrastructure focused – DMR also encourages skills development and income generation projects.

The municipality is a small rural municipality and probably rightfully places emphasis on basic service delivery and bulk infrastructure and water is a priority concern. However, whilst the Mine will cover the capital costs the municipality will have to cover the operations and maintenance costs and this must be factored into the socio-economic impact and "off-set" calculations;

2.8.2 Whether these LED projects are sufficient to mitigate the socio-economic and environmental impact on the Mine is, however, questionable. *The anticipated socio-economic impact of the Mine is significant*, e.g.

- 2.8.2.1 New comers, especially job-seekers, will be attracted into the area.
- 2.8.2.2 The municipality will need to deliver services and housing to these newcomers.
- 2.8.2.3 A significant number of jobs to be created will be short-term and construction related in the first few years of the Mine's operations. These workers will be sourced through construction companies that will probably source unskilled and semi-skilled workers locally. There future is uncertain and may contribute to growing unemployment and associated social problems within the community.
- 2.8.2.4 The long-term production jobs in the Mine will last 20 years. Economic activity within the community is limited so chances of employment within other sectors are scarce unless alternative forms of economic activity are stimulated during the life of the Mine.
- 2.8.2.5 The local municipality has no budget (Namakwa IDP 2012 2016) to finance LED projects (its focus is necessarily basic service provision) so requires private sector partners to come on board in that regard.

- 2.8.2.6 Conservation has not been specifically identified either by the municipality in its IDP or the Mine's SLP as a specific economic sector or an area of sustainable job creation. The sectors identified for growth are Tourism, Renewable Energy and Mariculture. However, they could be regarded as relatively compatible with conservation and could be linked to biodiversity and heritage protection. It is interesting to note that:
- 2.8.2.7 Both the Namakwa and Kamiesberg Municipalities note the biodiversity significance of their vegetation and their coastlines and the degradation thereof. Alien invasive vegetation and mining activities are causal factors identified for this degradation;
- 2.8.2.8 The Mine's proposed LED contribution does not correlate with the potential negative socio-economic impact of the Mine;
- 2.8.2.9 The SLP does not address broader environmental and biodiversity concerns within the community as its plans are focused on the Mine's operations and rehabilitation objectives;
- 2.8.2.10 We propose that the first 5-year projects are focused on basic service delivery, but we strongly argue that the Mine also has a social and corporate responsibility to promote alternative economic activity, and opportunities within their area of operation, in order to address the future opportunities of their workforce. In the case of the Kamiesberg Project, this is urgent, given the fact that the construction jobs to be created will be relatively short-term. The Mine also has a responsibility to contribute to biodiversity conservation within its broader environment.
- 2.8.2.11 We propose that to meet these imperatives, an additional project in the SLP could be on "Green Job Creation". These projects would be aligned to the Namakwa District's IDP where a number of these projects are already listed as indicated.
- 2.8.2.12 We propose the supporting of a "National Green Trust" that would operate within National Park Buffer Zones and Protected Areas that focus on:
 - Building capabilities required for monitoring of mining activities through research and bursary opportunities;
 - Promoting conservation as a key sector for rural economic development and job creation through building capabilities to:
 - Undertake socio-economic analyses of Buffer Zones, their broader regional economies, and conservation-linked economic opportunity;
 - Facilitate stakeholder engagement processes within Buffer Zone

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- Facilitate the extension of protected areas through private and public led initiatives and partnerships;
- Input into Mining
- Input into Municipality Spatial development Frameworks, Integrated Development Plans and LED Strategies; and
- Promote Green Job Creation.

6. SANParks REQUIRES THE FOLLOWING STUDIES.

6.1 A Full Economic evaluation study

Given the very high biodiversity importance of the proposed mining area, SANParks request that a full economic evaluation study be done.

A full economic valuation of mining compared with other reasonable/feasible alternative land uses, undertaken as a necessary component of the EIA, would determine whether mining would be the optimum sustainable land use in the proposed mining area. The economic valuation should ideally addresses the values of biodiversity and ecosystem services that conventional economic analysis excludes, since their value is not traded or priced in the marketplace.

A full economic valuation may show that the value of the intact ecosystem to local communities and society exceeds the value of mining as the new proposed land use. The economic evaluation needs to clearly show whether it would in the national interest to exploit these minerals. Furthermore, the study would also assess whether other alternative deposits or reserves exist, which could be exploited in areas, which are not biodiversity priority areas or less environmentally sensitive areas.

6.2 A full estuarine study

A full estuarine study on the impacts of loss of dilution and increased salt inputs into the system needs to be conducted – this is a very rare estuarine type and risks cannot be taken when considering its protection.

6.3 A full tourism impact study

A full tourism impact study, in terms of the potential impacts on tourism opportunities in the park. The park is heavily dependent on its sense of place, and it appears that the tailings facility will be visible across much of the park. Furthermore, the increased traffic and other mining activities on the road to the Groen River mouth could impact on tourism in this area.

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6.4 A full peer review

Given the very high biodiversity importance of the proposed mining site, SANParks are of the opinion that a qualified professional should perform a full review of the Draft Environmental and Social Management Plan and Monitoring Programme, (ESMPr), as there are sufficient omissions and discrepancies to raise significant concern.

SANParks reserves the right to revise these comments based on additional information that may be received, additionally, to oppose the mining right application if these comments are ignored.

Yours faithfully

Willem Louw Manager: Conservation Planning and Development Conservation Services Division – (SANParks Buffer Zones) South African National Parks (SANParks)

CC:

Mr Bernard van Lente, Park Manager, NNP Mr Lucius Moolman, General Manager: Arid Region - SANParks Dr Mike Knight: Head Park Planning and Development Mr Danie Smit – Deputy Director Integrated Environmental Authorisations (Sensitive Environments), Department Environmental Affairs; Mr Ishaan Abader: Deputy Director-General: Legal Authorisations, Compliance and Enforcements

APPENDIX H: UPDATED FAUNAL AND FLORAL SPECIES LISTS

Plant species

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Red List Status	NCNCA protected species
Acanthopsis carduifolia							
Adenogramma mollugo							
Agathosma elata						EN	
Albuca grandis							
Albuca secunda							
Aloe krapohliana						DDD	
Amphibolia laevis							
Amphiglossa tomentosa							
Antimima sp							
Arctotis decurrens							
Arctotis sp nov 1.(perennial, orange)						STBA	
Arctotis sp nov 2 (rubrosabulosa MS)							
Argyrolobium velutinum						EN	
Aspalathus albens						VU	
Aspalathus cuspidata							
Aspalathus quinquefolius							
Aspalathus spinescens ssp lepida							
Asparagus aethiopicus							
Asparagus alopecurus							
Asparagus capensis							
Asparagus exuvialis							
Asparagus rubicundus							
Babiana brachystachys							

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Red List Status	NCNCA protected species
Babiana confusa							
Babiana grandiflora							
Babiana hirsuta							
Babiana sinuata							
Berkheya fruticosa							
Boophone haemanthoides							
Brassica tournefortii							
Brownanthus sp							
Brunsvigia bosmaniae							
Calobota angustifolia							
Caesia sabulosa						VU	
Calobota lotononoides						NT	
Calobota sericea							
Cephallophyllum aff framesii							
Cheiridopsis sp nov						STBA	
Chlorophytum viscosum							
Chrysocoma longifolia							
Chrysocoma ciliata							
Chrysocoma sp							
Cissampelos capensis							
Cladoraphis cyperoides							
Cleretum bellidiformis							
Cleretum rourkei							
Cliffortia juniperina							
Cliffortia teretifolia							
Clutia daphnoides							

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining	Red List Status	NCNCA protected species
					area		
Clutia aff polifolia							
Conicosia elongata							
Conicosia pugioniformis							
Conophytum pageae							
Corycium crispum							
Cotula thunbergii							
Cotyledon orbiculata							
Crassula deceptor							Protected
Crassula expansa							Protected
Crassula muscosa							Protected
Crassula nudicaulis							Protected
Cyanella orchidiformis							Protected
Cytinus sanguineus							
Dicrocaulon ramulosum							
Dicrocaulon sp 1							
Dicrocaulon sp 2							
Didelta carnosa							
Dimorpotheca pinnata							
Dimorpotheca pluvialis							
Dimorpotheca tragus							
Diosma ramosissima							
Diospyros austro-africana							
Dischisma spicata							
Drosanthemum sp							
Drosanthemum salicola							
Ehrharta barbinodis							

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Red List Status	NCNCA protected species
Ehrharta calycina							
Elegia sp nov						STBA	
Elytropappus rhinocerotis							
Eriocephalus africanus var paniculatus							
Eriocephalus racemosus							
Eriospermum arenosum						VU	
Eriospermum paradoxum							
Eriospermum sp							
Euclea tomentosa							
Euphorbia burmanii							Protected
Euphorbia caputmedusae							Protected
Euphorbia tenax							Protected
Euphorbia tuberosa							Protected
Euryops tenuissimus							
Felicia australis							
Felicia dregei							
Felicia filifolia							
Felicia hyssopifolia							
Ferraria flava							
Ficinia argyropa							
Ficinia deusta							
Ficinia indica							
Frankenia pulverulenta							
Galenia africana							
Galenia fruticosa							
Galenia sarcophylla							

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Re
Galium capense						T
Gazania tenuifolia						
Gethyllis britteniana						-
Gethyllis ciliaris						+
Gladiolus carinatus						-
Gloveria integrifolia						
Gnidia clavata						
Grielum grandiflorum						
Grielum humifusum						
Gymnosporia buxifolia						
Hebebstreitia cordata						
Hebensreitia sp						
Helichrysum dunense						VL
Helichrysum tricostatum						NT
Helichrysum sp						
Heliophila cornuta						
Heliophila crithmifolia						
Heliophila juncea						
Heliophila sp						
Hermannia cuneifolia						
Hermannia heterophylla						
Hermannia scordifolia						
Hermannia sp nov						ST
Hermannia trifurca						1
Hessea pilosula						1
Hirpicium alienatum						\uparrow

NCNCA protected species
Protected

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in	Red List Status	NCNCA protected species
					proposed mining		
					area		
Hoplophyllum spinosum							
Hyobanche glabrata							
Hypertelis angrae pequenae							
Indigofera meyeriana							
Isolepis sp							
Jacobsenia sp nov						STBA	
Jordaaniella cuprea							
Jordaaniella spongiosa							
Justicia cuneata							
Kedrostis psammophila							
Lachenalia anguinea							Protected
Lachenalia mutabilis							Protected
Lachenalia punctata							Protected
Lachenalia splendida							Protected
Lachenalia sp nov						STBA	Protected
Lachenalia undulata							Protected
Lampranthus procumbens						VU	
Lampranthus stipulaceus							
Lapeirousia arenicola							
Lebeckia ambigua							
Leucadendron brunioides ssp bruniodes							
Leucoptera nodosa						VU	
Leucospermum rodolentum						VU	
Limeum africanum							
Limeum fenestratum							
Limonium sp nov (dagmarae MS)							

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Re
Lobostemon cinereus						1
Lotononis sp						
Lycium strandveldense						-
Lyperia tristis						-
Manulea altissima						-
Melianthus elongatus						
Mesembryanthemum crystallinum						-
Mesembryanthemum rapaceum						-
Metalasia adunca						NT
Metalasia densa						
Microloma sagittatum						-
Mollugo cerviana						
Mollugo pusilla						
Monechma spartioides						
Monilaria chrysoleuca						-
Monsonia spinosa						
Muraltia obovata						VL
Muraltia spinosa						
Nemesia anisocarpa						
Nemesia ligulata						
Nenax arenicola						
Nestlera biennis						-
Odyssea paucinervis						
Oncosiphon schlechteri						EN
Oncosiphon suffruticosus						
Ornithogalum multifolium						1

Red List Status	NCNCA protected species
	Protected
ΙT	
/U	
	Protected
	Protected
EN	
	Protected

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	R
Ornithoglossum viride						T
Osteospermum grandiflorum						
Osteospermum incanum						
Othonna aff. Hederifolia						
Othonna arbuscula						-
Othonna coronopifolia						+
Othonna cuneata						+
Othonna cylindrica						1
Othonna lepidocaulis						Ra
Othonna leptodactyla						
Othonna retrofracta						
Othonna sedifolia						
Othonna undulosa						
Oxalis flava						
Oxalis gracilis						
Oxalis hirta						
Oxalis purpurea						
Pelargonium caroli-henrici						Ra
Pelargonium fulgidum						
Pelargonium gibbosum						
Pelargonium senecioides						
Pelargonium triste						
Pharnaceum lanatum						
Pharnaceum microphyllum						
Phylica sp						1
Phyllobolus sp						\uparrow

ted List Status	NCNCA protected species
	Protected
Rare	
	Protected
	Protected
	Protected
	Protected
lare	
	Protected

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Re
Phyllobolus tenuiflorus						VU
Phyllopodium pumilum						
Psammotropha quadrangularis						
Psilocaulon sp						
Pteronia divaricata						
Pteronia onobromoides						
Pteronia ovalifolia						
Pteronia pallens						
Restio macer						
Rhynchopsidium pumilum						
Romulea tabularis						
Ruschia fugitans						
Ruschia goodiae						
Ruschia small fls						
Ruschia subpaniculata						
Ruschiella lunulata						
Salvia africana lutea						
Salvia lanceolata						
Searsia leavigata						1
Searsia longispina						
Selago						
Senecio alooides						
Senecio arenarius						+
Senecio bulbinifolia						
Senecio littoreus						
Senecio sarcoides						+

Red List Status	NCNCA protected species
/U	
	Protected
	5
	Protected

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	R
Spergularia media						-
Sporobolus virginicus						+
Stipagrostis ciliata						+
Stipagrostis obtusa						-
Stipagrostis zeyheri						+
Stoebe nervigera						+
Stoeberia frutescens						+
Stoeberia utilis						-
Tetragonia echinata						+
Tetragonia fruticosa						
Thamnochortus bachmanii						
Thesium elatior						
Thesium polycephalum						+
Thesium spinosum						+
Thesium strictum						
Trachyandra arenicola						
Trachyandra divaricata						
Trachyandra falcata						
Tribolium hispidum						
Trichogyne repens						
Tripteris clandestina						
Tripteris nordenstamii						1
Tripteris oppositifolia						1
Tripteris sp						1
Tylecodon ventricosus						+
Ursinia speciosa						1

Red List Status	NCNCA protected species

Species	Namaqualand Sand Fynbos	Namaqualand Strandveld	Hardeveld	Coastal fringe	Only seen in proposed mining area	Red List Status	NCNCA protected species
Wachendorfia multiflora							
Wahlenbergia asparagoides						VU	
Watsonia meriana							
Wiborgia aff monoptera							
Wiborgia obcordata							
Wiborgia fusca							
Willdenowia arescens							
Willdenowia incurvata							
Zaluzianskya affinis							
Zygophyllum cuneifolium							
Zygophyllum morgsana							
Zygophyllum cordifolium							
Zygophyllum spinosa							

Amphibian species

				NCNCA			Aquatic			Terrestri	al	
Full Name	Scientific Name	IUCN	Endemic	species of concern	Previously Recorded*	Recorded During Site Visit	Permanent Freshwater	River Bush	Succulent Karoo	Open / Grassland	Sand Fynbos	Rocky / Mountainous
Namaqua Rain Frog	Breviceps namaquensis				1	1			1	1	1	
Karoo Toad	Vandjikophrynus gariepensis				1			1	1	1	1	1
Paradise Toad	Vandjikophrynus robinsoni				1							1
Common Platanna	Xenopus laevis					1	1					
Cape River Frog	Amietia fuscigula					1		1				
Namaqua Caca	Cacosternum namaquense				1			1	1	1	1	
Cape Sand Frog	Tomopterna delandii				1			1	1	1	1	

			NCNCA Endomic species of			Aquatic			Terrestri	al	
Full Name	Scientific Name	IUCN	Endemic species of concern	Previously Recorded*	Recorded During Site Visit	Permanent Freshwater	River Bush	Succulent Karoo	Open / Grassland	Sand Fynbos	Rocky / Mountainous
Total	7	0	0	5	3						

Reptile species

				NCNCA species of					Aquati c			Те	rrestrial		
Full Name	Scientific Name	IUCN/SARC A	CITE S	concern	Endemi c	Possibl e	Previously Recorded *	Recorde d During Site Visit	Marine	Rive r Bush	Succulen t Karoo	Open / Grasslan d	Sand Fynbo S	Rocky / Mountainou s	Coastal Dunevel d
Tortoises & Turtles															
Angulate Tortoise	Chersina angulata		1				1	1		1	1		1		
Leatherback Turtle	Dermochelys coriacea	CR(G)/EN(R)	1	Protecte d			1		1						
Speckled Padloper	Homopus signatus signatus		1	Protecte d				1						1	
Karoo Tent Tortoise	Psammobates tentorius tentorius							1			1				
Trimen's Tent Tortoise	Psammobates tentorius trimeni		1				1	1			1			1	
Lizards															
Bibron's Thick-toed Gecko	Chondrodactylus bibroni						1	1		1				1	
Giant Ground Gecko	Chondrodactylus angulifer					1							1	1	
Striped Dwarf Leaf-Toed Gecko	Goggia lineata						1				1	1	1		
Austen's Thick-toed Gecko	Pachydactylus austeni						1						1		1
Barnad's Thick-toed Gecko	Pachydactylus barnardi				1		1	1			1				1
Western Cape Thick-toed Gecko	Pachydactylus labialis						1				1				
Marico Thick-toed Gecko	Pachydactylus mariquensis						1						1		

				NCNCA species of					Aquati c			Те	rrestrial		
Full Name	Scientific Name	IUCN/SARC A	CITE S	concern	Endemi c	Possibl e	Previously Recorded *	Recorde d During Site Visit	Marine	Rive r Bush	Succulen t Karoo	Open / Grasslan d	Sand Fynbo s	Rocky / Mountainou S	Coastal Dunevel d
Namaqua Thick-toed Gecko	Pachydactylus namaquensis						1				1			1	
Weber's Thick-toed Gecko	Pachydactylus weberi						1	1			1			1	
Namaqua Day Gecko	Phelsuma ocellata	NT/LC					1				1			1	
Common Barking Gecko	Ptenopus garrulous maculatus						1	1			1	1	1		
Coastal Legless Skink	Acontias litoralis						1						1		1
Striped Legless Skink	Acontias tristis						1						1		1
Cape Burrowing Skink	Scelotes caffer						1				1		1		1
Striped Dwarf Burrowing Skink	Scelotes sexlineatus						1				1		1		
Cuvier's blind Legless Skink	Typhlosaurus caecus					1							1		1
Cape Skink	Trachylepis capensis						1			1	1	1	1	1	
Western Rock Skink	Trachylepis sulcata sulcata						1	1						1	
Variegated Skink	Trachylepis variegate						1	1		1	1	1	1	1	
Smith's Desert Lizard	Meroles ctenodactylus						1	1					1		1
Knox's Desert Lizard	Meroles knoxii						1	1			1		1		
Western Sandveld Lizard	Nucras tesellata						1				1			1	
Spotted Sand Lizard	Pedioplanis lineoocellata pulchella						1							1	
Karoo Girdled Lizard	Karusasaurus polyzonus		1				1	1			1			1	
Peer's Girdled Lizard	Namazonurus peersi		1		1		1			1	1			1	
Armadillo Girdled Lizard	Ouroborus cataphractus	VU/LC	1				1			1	1			1	
Dwarf Plated Lizard	Cordylosaurus subtesselatus						1	1			1			1	
Namaqua Plated Lizard	Gerrhosaurus typicus	VU/LC					1			1	1			1	

				NCNCA species of					Aquati c			Те	restrial		
Full Name	Scientific Name	IUCN/SARC A	CITE S	concern	Endemi c	Possibl e	Previously Recorded *	Recorde d During Site Visit	Marine	Rive r Bush	Succulen t Karoo	Open / Grasslan d	Sand Fynbo s	Rocky / Mountainou s	Coastal Dunevel d
Southern Rock Agama	Agama atra						1	1			1			1	
Southern Spiny Agama	Agama hispida						1	1		1	1	1	1		
Namaqua Dwarf Chameleon	Bradypodion occidentale		1				1				1		1		
Desert Ground Chameleon	Chameleo namaquensis		1			1					1	1	1		
SNAKES															
Delalande's Beaked Blind Snake	Rhinotyphlops lalandei						1				1	1	1		
Common Egg Eater	Dasypeltis scabra						1			1	1	1	1	1	
Coral Snake	Aspidelaps lubricus						1			1	1	1	1	1	
Black-necked Spitting Cobra	Naja nigricincta woodi						1					1		1	
Cape Cobra	Naja nivea					1		R		1	1	1	1	1	1
Brown House Snake	Boaedon capensis						1			1	1	1	1	1	
Dwarf Beaked Snake	Dipsina multimaculata						1				1		1	1	
Spotted House Snake	Lamprophis guttatus						1			1				1	
Mole Snake	Pseudaspis cana					1				1	1	1	1	1	
Sundevall'a Shovel-snout Snake	Prosymna sundevalli						1			1			1	1	
Cross-marked Grass Snake	Psammophis crucifer						1						1		
Namib Sand Snake	Psammophis namibensis						1			1	1	1	1	1	
Karoo Sand Snake	Psammophis notostictus						1			1	1	1	1	1	
Spotted Skaapsteker	Psammophylax rhombeatus					1				1	1	1	1	1	
Puff Adder	Bitis arietans					1		R		1	1	1	1	1	1
Many-horned Adder	Bitis cornuta						1							1	

				NCNCA species of					Aquati c			Те	rrestrial		
Full Name	Scientific Name	IUCN/SARC A	CITE S	concern	Endemi c	Possibl e	Previously Recorded *	Recorde d During Site Visit	Marine	Rive r Bush	Succulen t Karoo	Open / Grasslan d	Sand Fynbo s	Rocky / Mountainou s	Coastal Dunevel d
Namaqua Dwarf Adder	Bitis schneideri	VU/(LC)					1						1		1
Total	54	5/1	9		2	7	45	18	1						

*Recorded during Reptile Atlas Project from 3017DC, 3017DA, 3017CB, 3017DB quarter degree grid square Bird species

						NCNCA species of					Aquatic				Terrestri	al	
Full Name	Scientific Name	IUCN	RD	S	E	concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
African Penguin	Spheniscus demersus	EN	VU			Protected	1			1							
Black-necked Grebe	Podiceps nigricollis					Protected	1		1			1					
Little Grebe	Tachybaptus ruficollis					Protected	1					1					
Wandering Albatross	Diomedea exulans	VU	VU	R/V		Protected	1				1						
Black-browed Albatross	Thalassarche melanophrys	EN	NT			Protected	1				1						
Shy Albatross	Thalassarche cauta	NT	VU	NBM		Protected	1				1						
Atlantic Yellow-nosed Albatross	Thalassarche chlororhynchos	EN	NT			Protected	1				1						
Grey-headed Albatross	Thalassarche chrysostoma	VU	VU	V			1				1						
Southern Giant Petrel	Macronectes giganteus		NT	NBM		Protected	1				1						
Northern Giant Petrel	Macronectes halli		NT	NBM		Protected	1				1						
Spectacled Petrel	Procellaria conspicillata	VU	E	NBM		Protected	1				1						
White-chinned Petrel	Procellaria aequinoctialis	VU	NT	NBM			1				1						
Great-winged Petrel	Pterodroma macroptera			NBM			1				1						

						NCNCA					Aquatic				Terrestri	al	
Full Name	Scientific Name	IUCN	RD	S	E	species of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
				V		Protected	1	,									
Kerguelen Petrel	Lugensa brevirostris						1				1						
Sooty Shearwater	Puffinus griseus	NT		NBM		Protected	1				1						
Cory's Shearwater	Calonectris diomedea			NBM		Protected	1				1						
Great Shearwater	Puffinus gravis			NBM		Protected	1				1						
Manx Shearwater	Puffinus puffinus			NBM		Protected	1				1						
Little Shearwater	Puffinus assimilis			NBM		Protected	1				1						
Southern Fulmar	Fulmarus glacialoides			R		Protected	1				1						
Pintado Petrel	Daption capense			NBM		Protected	1				1						
Soft-plumaged Petrel	Pterodroma mollis			NBM		Protected	1				1						
Blue Petrel	Halobaena caerulea			V		Protected	1				1						
Antarctic Prion	Pachyptila desolata					Protected	1				1						
European Storm Petrel	Hydrobates pelagicus			NBM		Protected	1				1						
Leach's Storm Petrel	Oceanodroma leucorhoa			NBM		Protected	1				1						
Wilson's Storm Petrel	Oceanites oceanicus			NBM		Protected	1				1						
Black-bellied Storm Petrel	Fregetta tropica			R/V		Protected	1				1						
Cape Gannet	Morus capensis	VU	VU			Protected	1			1							
White-breasted Cormorant	Phalacrocorax lucidus					Protected		1	1	1		1					
Cape Cormorant	Phalacrocorax capensis	NT	NT				1		1	1							
Crowned Cormorant	Phalacrocorax coronatus	NT	NT				1			1							
Bank Cormorant	Phalacrocorax neglectus	EN	VU				1			1							
Reed Cormorant	Phalacrocorax africanus					Protected	1					1					
Great White Pelican	Pelecanus onocrotalus		NT			Protected	1			1		1					
Grey Heron	Ardea cinerea					Protected		1	1			1					
Black-headed Heron	Ardea melanocephala					Protected	1		1			1			1		

						NCNCA					Aquatic	:			Terrestri	al	
Full Name	Scientific Name	IUCN	RD	S	E	species of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Little Egret	Egretta garzetta					Protected	1			1		1					
Black Stork	Ciconia nigra		NT				1			1		1					
White Stork	Ciconia ciconia			NBM		Protected	1								1		
Greater Flamingo	Phoenicopterus roseus		NT					1	1	1		1					
Lesser Flamingo	Phoeniconaias minor	NT	NT			Protected	1		1	1		1					
Hamerkop	Scopus umbretta					Protected	1					1					
Hadeda Ibis	Bostrychia hagedash					Protected		1	1						1		
African Sacred Ibis	Threskiornis aethiopicus					Protected	1		1	1					1		
Egyptian Goose	Alopochen aegyptiaca					Protected		1	1	1		1					
South African Shelduck	Tadorna cana							1	1			1					
Spur-winged Goose	Plectropterus gambensis					Protected	1		1			1					
Maccoa Duck	Oxyura maccoa	NT				Protected		1				1					-
Yellow-billed Duck	Anas undulata					Protected	1					1					
African Black Duck	Anas sparsa					Protected	1					1					
Cape Shoveler	Anas smithii					Protected	1					1					-
Cape Teal	Anas capensis					Protected	1		1			1					
Red-billed Teal	Anas erythrorhyncha					Protected	1					1					-
African Fish Eagle	Haliaeetus vocifer					Protected	1			1		1					
Black-chested Snake Eagle	Circaetus pectoralis					Protected		1	1					1	1	1	
Martial Eagle	Polemaetus bellicosus	NT	VU			Protected		1						1	1	1	1
Verreaux's Eagle	Aquila verreauxii					Protected		1						1		1	1
Booted Eagle	Hieraaetus pennatus			NBM		Protected		1						1		1	
Jackal Buzzard	Buteo rufofuscus				(*)	Protected		1	1					1	1	1	1
Common (Steppe) Buzzard	Buteo buteo			NBM			1							1	1	1	

						NCNCA				ŀ	quatic				Terrestria	al	
						species of											
Full Name	Scientific Namo	IUCN	RD	c	E	concern	Dessible	Recorded:	Recorded:	Cat/Eat	0.	Wat		Chri	Create	From	D.O.b.m
run Name	Scientific Name	IUCIN		S	E		Possible	Dry	Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Black Harrier	Circus maurus	VU	NT		(*)	Protected	1		1					1	1	1	
Pale Chanting Goshawk	Melierax canorus					Protected		1	1					1	1	1	
Yellow-billed Kite	Milvus aegyptius			BM			1							1	1	1	
Black-shouldered Kite	Elanus caeruleus					Protected	1							1	1	1	
Lanner Falcon	Falco biarmicus		NT			Protected		1	1					1	1	1	1
Peregrine Falcon	Falco peregrinus		NT			Protected	1							1	1	1	1
Rock Kestrel	Falco rupicolus					Protected		1	1					1	1	1	1
Greater Kestrel	Falco rupicoloides					Protected		1	1					1	1	1	1
Cape Spurfowl	Pternistis capensis				(*)	Protected	1								1	1	
Grey-winged Francolin	Scleroptila africana				(*)	Protected	1								1	1	
Helmeted Guineafowl	Numida meleagris					Protected	1						1		1	1	
Common Ostrich	Struthio camelus							1	1					1	1	1	
Common Quail	Coturnix coturnix			NBM		Protected	1		1						1	1	
Common Moorhen	Gallinula chloropus					Protected	1					1					
Red-knobbed coot	Fulica cristata					Protected	1					1					
African Rail	Rallus caerulescens						1					1					
Red-chested Flufftail	Sarothrura rufa						1					1					
Secretarybird	Sagittarius serpentarius	VU	NT			Protected		1	1					1	1	1	
Kori Bustard	Ardeotis kori		VU					1						1	1		
Ludwig's Bustard	Neotis ludwigii	EN	VU			Protected	1		1					1	1		
Karoo Korhaan	Eupodotis vigorsii					Protected	1							1	1		
Southern Black Korhaan	Afrotis afra				*	Protected		1	1					1		1	
African Black Oystercatcher	Haematopus moquini	NT	NT	BM		Protected		1	1	1							
Pied Avocet	Recurvirostra avosetta					Protected	1		1			1					

					NCNCA					Aquatio	:			Terrestri	al	
Full Name	Scientific Name	IUCN	RD	S	species of concern E	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Black-winged Stilt	Himantopus himantopus				Protected	1		1			1					
Common Ringed Plover	Charadrius hiaticula			NBM	Protected	1			1		1					
Kittlitz's Plover	Charadrius pecuarius				Protected	1			1		1					
Three-banded Plover	Charadrius tricollaris				Protected	1		1	1		1					
White-fronted Plover	Charadrius marginatus				Protected		1	1	1							
Chestnut-banded Plover	Charadrius pallidus	NT	NT			1			1							
Crowned Lapwing	Vanellus coronatus				Protected		1	1						1		
Blacksmith Lapwing	Vanellus armatus				Protected	1					1					
Grey Plover	Pluvialis squatarola			NBM	Protected		1		1							
Ruff	Philomachus pugnax			NBM	Protected	1			1		1					
Red Knot	Calidris canutus			NBM	Protected	1			1							
Curlew Sandpiper	Calidris ferruginea			NBM	Protected	1			1		1					
Sanderling	Calidris alba			NBM	Protected	1			1							
Little Stint	Calidris minuta			NB	Protected	1			1		1					
Common Sandpiper	Actitis hypoleucos			NBM	Protected	1			1		1					
Wood Sandpiper	Tringa glareola			NBM	Protected	1					1					
Marsh Sandpiper	Tringa stagnatilis			NBM	Protected	1			1		1					
Common Greenshank	Tringa nebularia			NBM	Protected	1			1		1					
Bar-tailed Godwit	Limosa lapponica			NBM	Protected	1			1							
Eurasian Curlew	Numenius arquata			NBM	Protected	1			1							
Common Whimbrel	Numenius phaeopus			NBM	Protected	1			1							
Ruddy Turnstone	Arenaria interpres			NBM	Protected	1			1							
Red Phalarope	Phalaropus fulicarius			NBM	Protected	1				1						
Spotted Thick-knee	Burhinus capensis				Protected		1	1					1	1	1	

						NCNCA					Aquatic	;			Terrestri	al	
Full Name	Scientific Name	IUCN R	RD	s	E	species of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Water Thick-knee	Burhinus vermiculatus					Protected	1					1	1				
Burchell's Courser	Cursorius rufus					Protected	1								1		
Double-banded Courser	Rhinoptilus africanus					Protected	1							1	1		
Parasitic Jaeger	Stercorarius parasiticus		N	BM		Protected	1				1						
Long-tailed Jaeger	Stercorarius longicaudus		N	BM		Protected	1				1						
Pomarine Skua	Stercorarius pomarinus		N	BM		Protected	1				1						
Subantarctic Skua	Stercorarius antarctica		N	BM			1				1						
Cape Gull	Larus vetula							1	1	1							
Caspian Tern	Sterna caspia	٩	NT			Protected	1			1		1					
Damara Tern	Sterna balaenaru,	(CR			Protected	1										
Hartlaub's Gull	Chroicocephalus hartlaubii							1	1	1							
Grey-headed Gull	Chroicocephalus cirrocephalus						1			1		1					
Sabine's Gull	Xema sabini		N	BM		Protected	1			1							
Swift Tern	Thalasseus bergii					Protected	1		1	1							
Sandwich Tern	Thalasseus sandvicensis		N	BM		Protected	1			1							
Common Tern	Sterna hirundo		N	BM		Protected	1		1	1							
Arctic Tern	Sterna paradisaea		N	BM		Protected	1			1	1						
Antarctic Tern	Sterna vittata		N	BM		Protected	1			1	1						
Little Tern	Sterna albifrons		N	BM		Protected	1			1							
Black Tern	Chlidonias niger			V		Protected	1			1	1						
Whiskered Tern	Chlidonias hybrida					Protected	1					1					
White-winged Tern	Chlidonias leucopterus		N	BM		Protected	1					1					
Namaqua Sandgrouse	Pterocles namaqua					Protected		1						1	1		
	· · · · · · · · · · · · · · · · · · ·								1				1			1	
Speckled Pigeon	Columba guinea					Protected		1	1				1	1	1	1	L

						NCNCA				ŀ	Aquatic				Terrestria	al	
						species of		Recorded:	Recorded:								
Full Name	Scientific Name	IUCN	RD	S	E	concern	Possible	Dry	Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Red-eyed Dove	Streptopelia semitorquata					Protected		1					1	1	1	1	
Cape Turtle Dove	Streptopelia capicola					Protected		1	1				1	1	1	1	
Laughing Dove	Streptopelia senegalensis					Protected		1	1				1	1	1	1	
Namaqua Dove	Oena capensis					Protected		1	1				1	1	1		
Spotted Eagle-Owl	Bubo africanus					Protected		1	1				1	1	1	1	
Western Barn Owl	Tyto alba					Protected	1						1	1	1	1	
Cape Eagle-Owl	Bubo capensis					Protected	1										1
Fiery-necked Nightjar	Caprimulgus pectoralis					Protected		1					1	1			
Freckled Nightjar	Caprimulgus tristigma					Protected	1										1
Common Swift	Apus apus			NBM		Protected		1						1	1	1	1
Alpine Swift	Tachymarptis melba			BM		Protected	1		1					1	1	1	1
Little Swift	Apus affinis					Protected		1	1					1	1	1	1
White-rumped Swift	Apus caffer			BM		Protected	1							1	1	1	1
Horus Swift	Apus horus					Protected	1							1	1	1	1
White-backed Mousebird	Colius colius							1	1				1	1	1	1	
Red-faced Mousebird	Urocolius indicus						1						1	1		1	
Pied Kingfisher	Ceryle rudis					Protected	1			1		1					
European Bee-eater	Merops apiaster			B/NBM		Protected	1						1		1	1	
African Hoopoe	Upupa africana							1	1				1				
Acacia Pied Barbet	Tricholaema leucomelas						1						1				
Ground Woodpecker	Geocolaptes olivaceus				(*)		1										1
Cardinal Woodpecker	Dendropicos fuscescens						1						1				
Cape Clapper Lark	Mirafra apiata				(*)			1	1					1		1	
Karoo Lark	Calendulauda albescens				(*)			1	1					1		1	

				NCNCA				ļ	Aquatic				Terrestri	al	
Full Name	Scientific Name IUCN	RD S	-	pecies of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Large-billed Lark	Galerida magnirostris		(*)			1	1					1	1	1	
Red-capped Lark	Calandrella cinerea				1		1						1		
Cape Long-billed Lark	Certhilauda curvirostris		*			1	1						1	1	
Karoo Long-billed Lark	Certhilauda subcoronata				1							1	1		
Spike-heeled Lark	Chersomanes albofasciata					1	1					1	1		
Grey-backed Sparrow-lark	Eremopterix verticalis					1						1	1		
Black-eared Sparrow-lark	Eremopterix australis		(*)		1							1	1		
Greater Striped Swallow	Cecropis cucullata	BN	1		1					1			1		
Barn Swallow	Hirundo rustica	NBN	Λ			1					1	1	1	1	1
Pearl-breasted Swallow	Hirundo dimidiata					1				1	1				
White-throated Swallow	Hirundo albigularis	BN	1		1					1					
Rock Martin	Hirundo fuligula					1	1								1
Sand Martin	Riparia riparia	NBN	Л		1					1					
Brown-throated Martin	Riparia paludicola				1					1					
Banded Martin	Riparia cincta				1								1		
Cape Crow	Corvus capensis					1						1	1	1	1
Pied crow	Corvus albus					1	1					1	1	1	1
White-necked Raven	Corvus albicollis				1							1	1	1	1
Grey Tit	Parus afer		(*)			1	1					1		1	
Cape Bulbul	Pycnonotus capensis		*			1	1				1	1		1	
African Red-eyed Bulbul	Pycnonotus nigricans				1						1				
Olive Thrush	Turdus olivaceus				1						1				
Karoo Thrush	Turdus smithi		(*)		1		1				1				
Mountain Wheatear	Oenanthe monticola					1	1								1

						NCNCA					Aquatic				Terrestri	al	
Full Name	Scientific Name	IUCN	RD	S	E	species of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Familiar Chat	Cercomela familiaris							1	1								1
Tractrac Chat	Cercomela tractrac						1							1	1	1	
Sickle-winged Chat	Cercomela sinuata				(*)		1							1	1		1
Karoo Chat	Cercomela schlegelii						1		1					1			
Capped Wheatear	Oenanthe pileata							1	1						1		1
African StoneChat	Saxicola torquatus							1	1			1			1		
Ant-eating Chat	Myrmecocichla formicivora							1	1					1	1		1
Cape Robin-Chat	Cossypha caffra							1	1				1				
Karoo Scrub Robin	Erythropygia coryphoeus							1	1					1		1	
Willow Warbler	Phylloscopus trochilus			NBM				1					1				
Cape Penduline-Tit	Anthoscopus minutus							1						1		1	
Yellow-bellied Eremomela	Eremomela icteropygialis						1						1				
Little Rush Warbler	Bradypterus baboecala						1					1	1				
African Reed Warbler	Acrocephalus baeticatus			BM				1				1	1				
Lesser Swamp Warbler	Acrocephalus gracilirostris						1					1	1				
Cinnamon-breasted Warbler	Euryptila subcinnamomea				(*)		1										1
Cape Grassbird	Sphenoeacus afer				(*)		1								1	1	
Chestnut-vented Tit-Babbler	Sylvia subcaerulea							1	1				1	1		1	
Fairy Flycatcher	Stenostira scita				(*)			1					1				
Layard's Tit-Babbler	Sylvia layardi				(*)		1		1				1	1		1	
Long-billed crombec	Sylvietta rufescens						1						1	1		1	
Bar-throated Apalis	Apalis thoracica						1						1				
Zitting Cisticola	Cisticola juncidis						1					1			1		
Cloud Cisticola	Cisticola textrix				(*)		1								1		

						NCNCA				ŀ	Aquatic				Terrestri	al	
Full Name	Scientific Name	IUCN	RD	S	E	species of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Grey-backed Cisticola	Cisticola subruficapilla							1	1					1		1	
Levaillant's Cisticola	Cisticola tinniens							1	1			1					
Karoo Prinia	Prinia maculosa				(*)			1	1					1		1	1
Namaqua Warbler	Phragmacia substriata				(*)			1	1				1				
Rufous-eared Warbler	Malcorus pectoralis							1	1					1			
Fiscal Flycatcher	Sigelus silens				(*)			1					1				
Spotted flycatcher	Muscicapa striata			NBM			1						1				
Chat Flycatcher	Bradornis infuscatus						1		1					1	1	1	
Cape White-eye	Zosterops capensis				(*)		1						1				
Orange River White-eye	Zosterops pallidus						1						1				
Pririt Batis	Batis pririt						1		1				1				
Cape Wagtail	Motacilla capensis							1	1			1					
Long-billed Pipit	Anthus similis						1										1
African Pipit	Anthus cinnamomeus						1								1		
Cape Longclaw	Macronyx capensis						1								1		
Common Fiscal	Lanius collaris							1	1				1	1	1	1	1
Bokmakierie	Telophorus zeylonus							1	1					1	1	1	
Cape Glossy Starling	Lamprotornis nitens						1						1				
Pale-winged Starling	Onychognathus nabouroup						1							1			1
Pied Starling	Lamprotornis bicolor				(*)			1	1					1	1		
Common Starling	Sturnus vulgaris			1			1		1				1	1	1	1	1
Wattled Starling	Creatophora cinerea						1		1				1		1		
Malachite Sunbird	Nectarinia famosa						1		1					1		1	1
Dusky Sunbird	Cinnyris fuscus						1		1				1	1			

						NCNCA				1	Aquatic				Terrestria	al	
Full Name	Scientific Name	IUCN	RD	S	E	species of concern	Possible	Recorded: Dry	Recorded: Wet	Cst/Est	Oc.	Wet.	R.B.	Str.	Grass.	Fyn.	Mtn.
Southern Double-collared Sunbird	Cinnyris chalybeus				(*)			1	1				1			1	
House Sparrow	Passer domesticus			I				1	1				1	1	1	1	1
Cape Sparrow	Passer melanurus							1	1				1	1	1		
Southern Grey-headed Sparrow	Passer diffusus						1						1				
Southern Masked Weaver	Ploceus velatus							1	1				1		1		
Cape Weaver	Ploceus capensis				(*)			1	1				1		1		
Southern Red Bishop	Euplectes orix						1		1			1			1		
Yellow Bishop	Euplectes capensis						1					1			1	1	
Pin-tailed Whydah	Vidua macroura						1						1		1		
Common Waxbill	Estrilda astrild							1				1	1		1		
Yellow Canary	Crithagra flaviventris							1	1					1	1	1	1
Cape Canary	Serinus canicollis						1								1	1	1
Black-headed Canary	Serinus alario				(*)		1		1				1	1			1
Damara Canary	Serinus leucolaema						1										1
Streaky-headed Seedeater	Crithagra gularis						1						1	1			
White-throated Canary	Crithagra albogularis							1	1					1		1	1
Cape Bunting	Emberiza capensis							1	1							1	1
Lark-like Bunting	Emberiza impetuani						1		1				1	1			1
Total	246						164	83	92	46	33	60	55	78	83	67	40
							66%	34%	37%	19%	13%	24%	22%	32%	34%	27%	16%

IUCN = International Union for Conservation of Nature (red list); RDB = Red Data Book; S = Status: R: Rare; V: Vagrant; BM: Breeding Migrant; NBM: Non-Breeding Migrant; E = Endemic; * = Full Endemic; (*) = Near Endemic Cst/Est = Coastal / Estuary; Oc. = Oceanic; Wet. = Wetland; R.B. = Riverine Bush; Str. = Strandveld; Grass. = Grassland/open areas; Fyn. = Sand Fynbos; Mtn. =Mountainous/Rocky areas.

English Name	Scientific Name	IUCN	RDB	NCNCA species of concern	Historical Possibl	Recorded:	Recorded: Wet	Oceanic	Aerial	River Bush	Succulent Karoo / Strandveld	Open / Grassland	Sand Fynbos	Rocky / Mountainous	Duneveld
			NDB				vvet	Oceanic	Acriai	bush	Strandverd	Grassianu	Fyiibus	Wountamous	Dullevelu
Golden Moles: AFROSO	RICIDA														
Cape Golden Mole	Chrysochloris asiatica		DD	Protected	1						1				1
Van Zyl's Golden Mole	Cryptochloris zyli	EN	CR	Protected	1						1		1		1
Grant's Golden Mole	Eremitalpa granti		VU	Protected	1		1								
Elephant-shrews: MACF	ROSCELIDEA														
Cape Rock Elephant-shrew	Elephantulus edwardii			Protected	1									1	
Smith's Rock Elephant-shrew	Elephantulus rupestris			Protected	1						1			1	
Round-eared Elephant-shrew	Macroscelides proboscideus			Protected	1						1	1			
Shrews: EULIPOTYPHLA															
Reddish-grey Musk Shrew	Crocidura cyanea			Protected	1							1		1	
Forest Shrew	Myosorex varius			Protected	1					1	1	1	1	1	1
Greater Red Musk Shrew	Crocidura flavescens			Protected	1							1			
Lesser Dwarf Shrew	Suncus varilla			Protected	1						1	1			
Bats: CHIROPTERA															
Straw-coloured Fruit Bat	Eidolon helvum	NT		Protected	1				1						
Egyptian Slit-faced Bat	Nycteris thebaica			Protected	1				1						
Cape Horseshoe Bat	Rhinolophus capensis		NT	Protected	1				1						
Geoffroy's Horseshoe Bat	Rhinolophus clivosus		NT	Protected	1				1						
Schreiber's Long-fingered Bat	Miniopterus schreibersii	NT	NT	Protected	1				1						
Cape Serotine Bat	Pipistrellus capensis				1		1		1						
Long-tailed House Bat	Eptesicus hottentotus			Protected	1				1						
Egyptian Free-tailed Bat	Tadarida aegyptiaca			Protected	1				1						

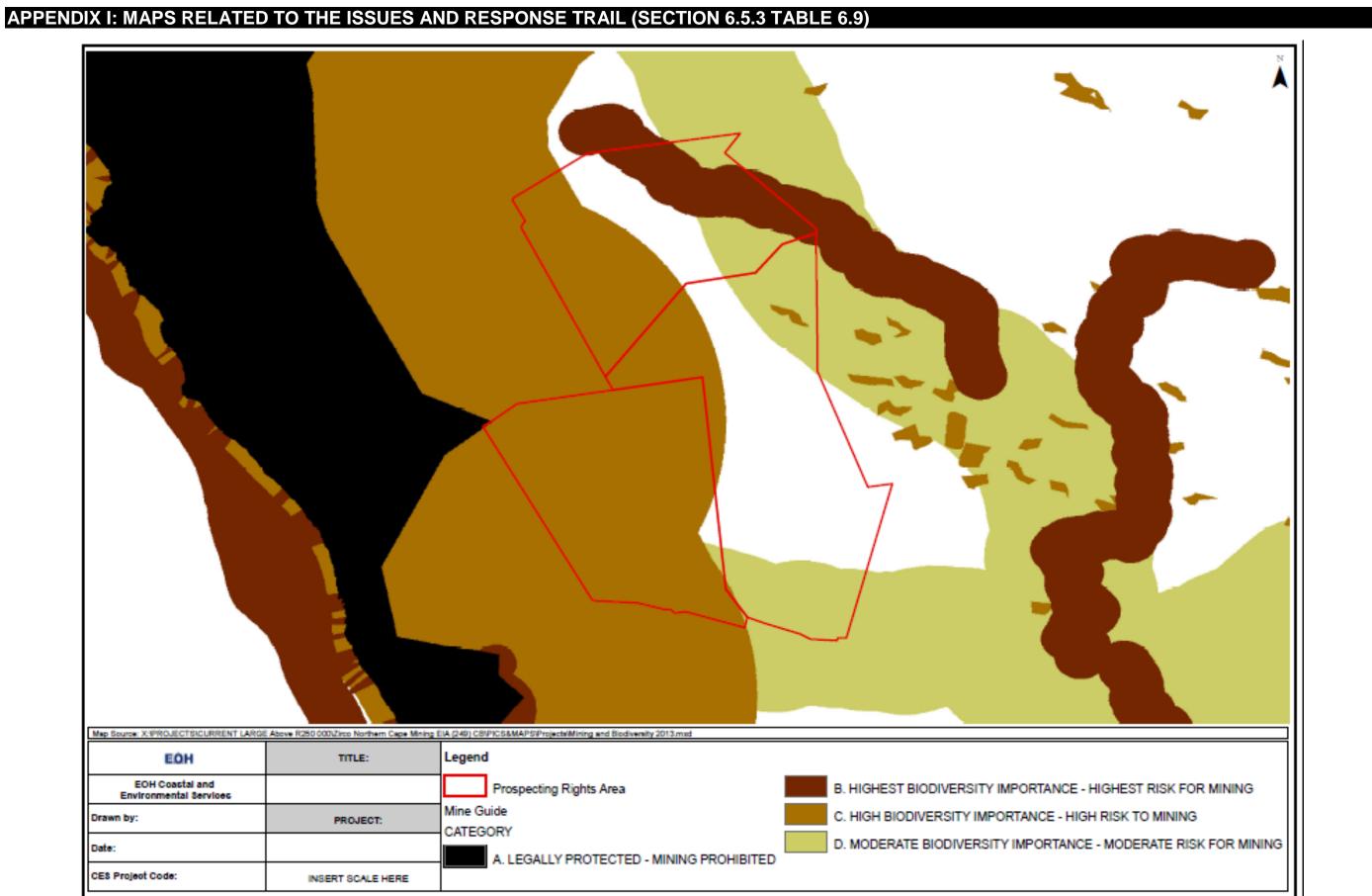
English Name	Scientific Name	IUCN RDB	NCNCA species of concern	Historical	Possible	Recorded: Dry	Recorded: Wet	Oceanic	Aerial	River Bush	Succulent Karoo / Strandveld	Open / Grassland	Sand Fynbos	Rocky / Mountainous	Duneveld
Baboons: PRIMATES															
Chacma Baboon	Papio ursinus					1								1	
Hares: LAGOMORPHA															
Cape Hare	Lepus capensis		Protected			1					1	1			
Scrub Hare	Lepus saxatilis		Protected		1		1			1	1				
Rodents: RODENTIA															
Gray African Climbing Mouse	Dendromus melanotis		Protected		1					1		1			
Large-eared Mouse	Malacothrix typica		Protected		1						1	1			
Short-tailed Gerbil			Protected											1	
	Desmodillus auricularis				1						1	1		1	
Hairy-footed Gerbil	Gerbillurus paeba		Protected		1								1		1
Namaqua Rock Mouse	Aethomys namaquensis		Protected		1					1	1	1	1	1	1
Pygmy Mouse	Mus minutoides		Protected		1					1	1	1	1	1	1
House Mouse	Mus musculus				1							1			1
Four-striped Grass Mouse	Rhabdomys pumilio		Protected			1				1	1	1	1	1	1
Brants's Whistling Rat	Parotomys brantsii		Protected		1						1	1			
Littledale's Whistling Rat	Parotomys littledalei		Protected		1						1	1			
Karoo Bush Rat	Otomys unisulcatus		Protected		1		1				1		1		
Vlei Rat	Otomys irroratus		Protected			1				1		1			
Spectacled Dormouse	Graphiurus ocularis		Protected		1									1	
Porcupine	Hystrix africaeaustralis		Protected			1	1			1	1		1		1
Dassie Rat	Petromus typicus	NT	Protected		1									1	
														<u> </u>	
Namaqua Dune Molerat	Bathyergus janetta	NT	Protected			1	1						1		1
African Mole Rat	Cryptomys hottentotus		Protected								1		1		1

English Name	Scientific Name	IUCN	RDB	NCNCA species of concern	Historical	Possible	Recorded: Dry	Recorded: Wet	Oceanic	Aerial	River Bush	Succulent Karoo / Strandveld	Open / Grassland	Sand Fynbos	Rocky / Mountainous	Duneveld
Carnovores: CARNI	VORA	J		I	I	I	I									
Cape Fox	Vulpes chama			Protected		1					1	1		1		
Bat-eared Fox	Otocyon megalotis			Protected			1	1			1	1		1		
Black-backed Jackal	Canis mesomelas					1					1	1		1	1	
Wild Dog	Lycaon pictus	EN	EN	Protected	1						1	1	1	1	1	1
Honey Badger	Mellivora capensis		NT	Protected							1	1	1		1	
Striped Polecat	Ictonyx striatus			Protected		1					1	1	1	1	1	1
Yellow Mongoose	Cynictis penicillata			Protected			1	1				1				1
Small Grey Mongoose	Galerella pulverulenta			Protected			1	1			1	1	1			1
Suricate	Suricata suricatta			Protected			1	1				1	1			
Small-spotted Genet	Genetta genetta			Protected			1				1	1		1		
Spotted Hyaena	Crocuta crocuta		NT	Protected	1						1	1	1	1	1	
Brown Hyaena	Hyaena brunnea	NT	NT	Protected		1					1	1				1
Aardwolf	Proteles cristatus			Protected		1						1				
Caracal	Felis caracal					1					1	1		1	1	
African Wild Cat	Felis silvestris			Protected		1					1	1		1		
Small Spotted Cat	Felis nigripes	VU		Protected		1					1	1		1		
Cheetah	Acinonyx jubatus	VU	VU	Protected	1							1	1	1		
Lion	Panthera leo	VU	VU	Protected	1						1	1	1	1	1	
Leopard	Panthera pardus	NT		Protected	1						1	1		1	1	
Aardvark: TUBULID	PENTATA															
Aardvark	Orycteropus afer			Protected			1	1			1	1	1	1		
Elephant: PROBOSO	CIDEA															

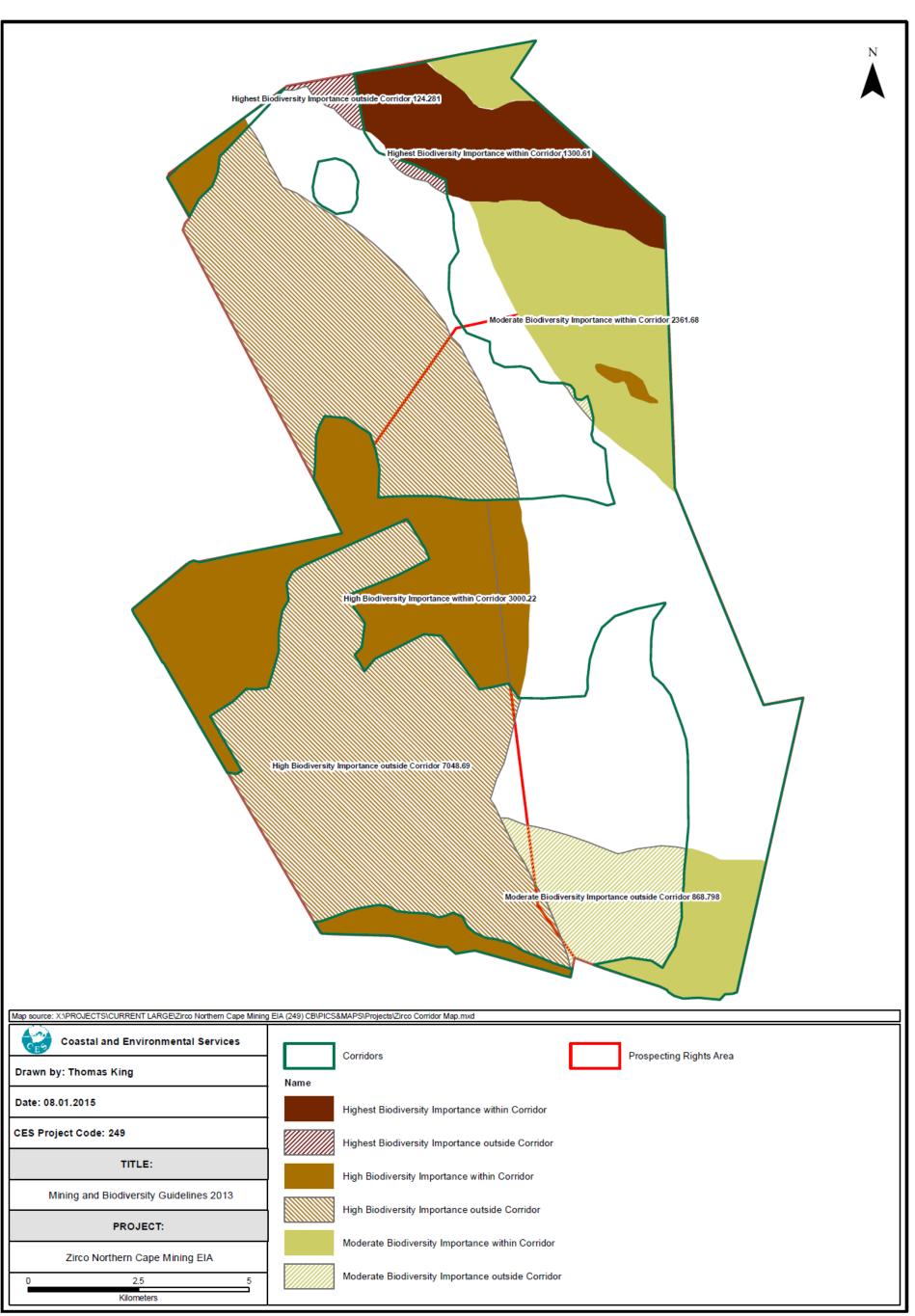
English Name	Scientific Name	IUCN	RDB	NCNCA species of concern	Historical	Possible	Recorded: Dry	Recorded: Wet	Oceanic	Aerial	River Bush	Succulent Karoo / Strandveld	Open / Grassland	Sand Fynbos	Rocky / Mountainous	Duneveld
African Elephant	Loxodonta africana	VU		Protected	1						1	1				
Hyrax: HYR	COIDEA		<u> </u>	<u> </u>	<u> </u>	<u> </u>										
Rock Dassie	Procavia capensis						1	1							1	
Rhinoceros	s: PERISSODACTYLA	_	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>									
Hook-lipped Rhinoceros	Diceros bicornis bicornis	VU	CR	Protected	1						1	1				
Antelope: R	JMINANTIA		I													
Common Eland	Tragelaphus oryx			Protected	1						1	1	1	1	1	1
Gemsbok	Oryx gazella			Protected	1						1	1	1			
Grey Rhebok	Pelea capreolus			Protected		1						1			1	
Red Hartebeest	Alcelaphus buselaphus			Protected	1							1	1			
Springbok	Antidorcas marsupialis			Protected			1	1				1	1			
Klipspringer	Oreotragus oreotragus			Protected		1									1	
Steenbuck	Raphicerus campestris			Protected			1	1				1	1	1		
Cape Grysbok	Raphicerus melanotis			Protected		1					1	1		1		
Common (Grey) Duiker	Sylvicapra grimmia			Protected			1	1			1	1				
Terrestrial Sub-Total	68	;			10	42	16	15								
MARINE MA	MMALS															
Fur Seals: C	ARNIVORA															
Cape Fur Seal	Arctocephalus pusillus			Protected		1		1	1							
Whales and	Dolphins: WHIPPOMORPHA – CETACEA			<u> </u>												
Dwarf Minke Whale	Balaenoptera acutorostrata	,		Protected		1			1							
Bryde's Whale	Balaenoptera edeni	DD	VU	Protected		1			1							
Sei Whale	Balaenoptera borealis	EN		Protected		1			1							

				NCNCA												
				species								Succulent				
				of			Recorded:	Recorded:			River	Karoo /	Open /	Sand	Rocky /	
English Name	Scientific Name	IUCN	RDB	concern	Historical	Possible	Dry	Wet	Oceanic	Aerial	Bush	Strandveld	Grassland	Fynbos	Mountainous	Duneveld
Fin Whale	Balaenoptera physalus	EN		Protected		1			1							
Blue Whale	Balaenoptera musculus	EN	EN	Protected		1			1							
Humpback Whale	Megaptera novaeangliae		NT	Protected		1			1							
Southern Right Whale	Eubalaena australis			Protected		1			1							
Pygmy Right Whale	Caperea marginata			Protected		1			1							
Southern Bottlenose Whale	Hyperoodon planifrons			Protected		1			1							
Cuvier's Beaked Whale	Ziphius cavirostris			Protected		1			1							
Gray's Beaked Whale	Mesoplodon grayi	DD		Protected		1			1							
Strap-toothed Beaked Whale	Mesoplodon layardii	DD		Protected		1			1							
Pygmy Sperm Whale	Kogia breviceps	DD		Protected		1			1							
Sperm Whale	Physeter catodon	VU	VU	Protected		1			1							
Southern Right Whale Dolphin	Lissodelphis peronii	DD		Protected		1			1							
Killer Whale	Orcinus orca	DD		Protected		1			1							
False Killer Whale	Pseudorca crassidens	DD		Protected		1			1							
Pygmy Killer Whale	Feresa attenuata	DD		Protected		1			1							
Long-finned Pilot Whale	Globicephala melas	DD		Protected		1			1							
Risso's Dolphin	Grampus griseus			Protected		1			1							
Heaviside's Dolphin	Cephalorhynchus heavisidii	DD				1			1							
Short-beaked Common Dolphin	Delphinus delphis			Protected		1			1							
Dusky Dolphin	Lagenorhynchus obscurus	DD		Protected		1			1							
Atlantic Ocean Bottlenosed Dolphin	Tursiops truncatus			Protected		1			1							
Marine Sub-Total	25				0	25	0	1								
Overall Total	93				10	67	16	16	25	8	30	49	30	28	23	17

				NCNCA												
				species								Succulent				
				of			Recorded:	Recorded:			River	Karoo /	Open /	Sand	Rocky /	
English Name	Scientific Name	IUCN	RDB	concern	Historical	Possible	Dry	Wet	Oceanic	Aerial	Bush	Strandveld	Grassland	Fynbos	Mountainous	Duneveld
									27%	9%	32%	53%	32%	30%	25%	18%

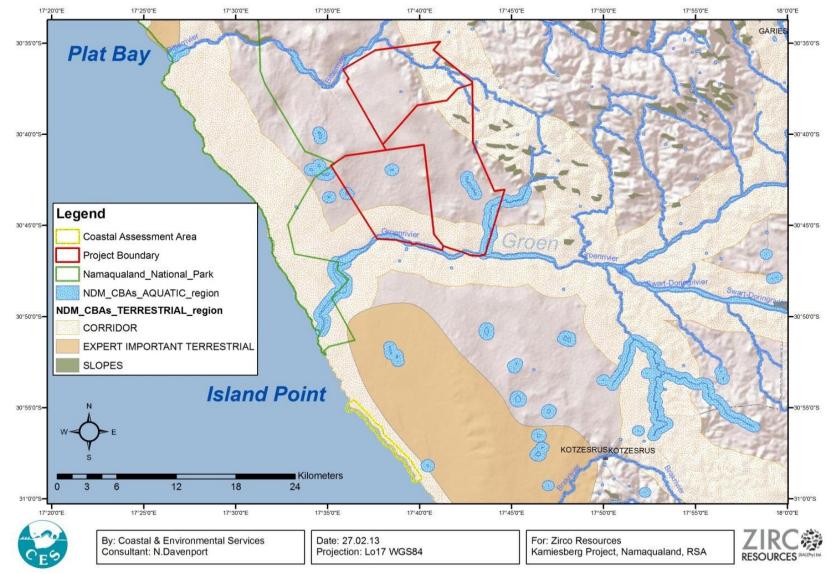


Map 1: Categories proposed in the Mining and Biodiversity Guidelines of 2013

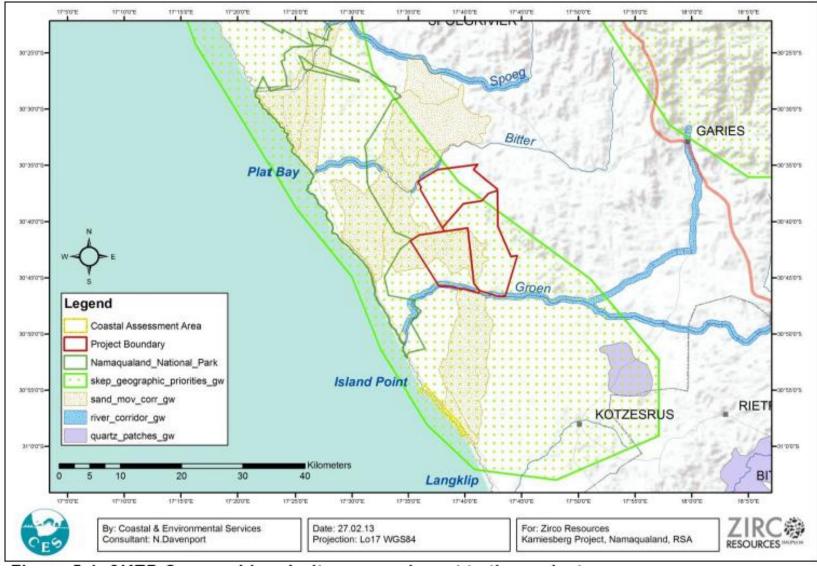


Map 2: Areas covered by each of the Categories proposed in the Mining and Biodiversity Guidelines of 2013

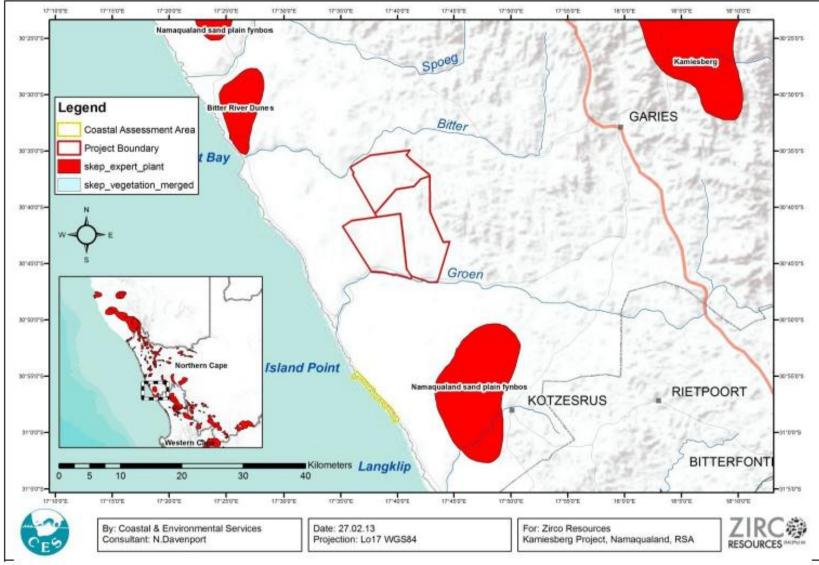
154



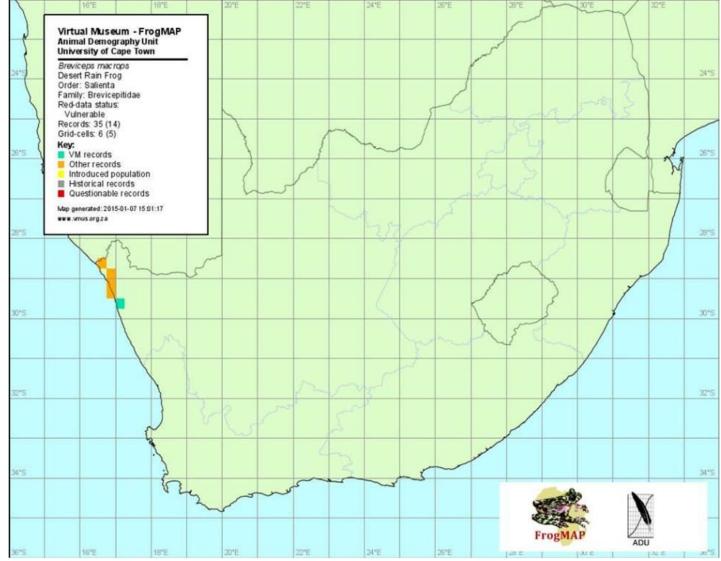
Map 3: CBAs according to the Namaqua District Municipality SDF



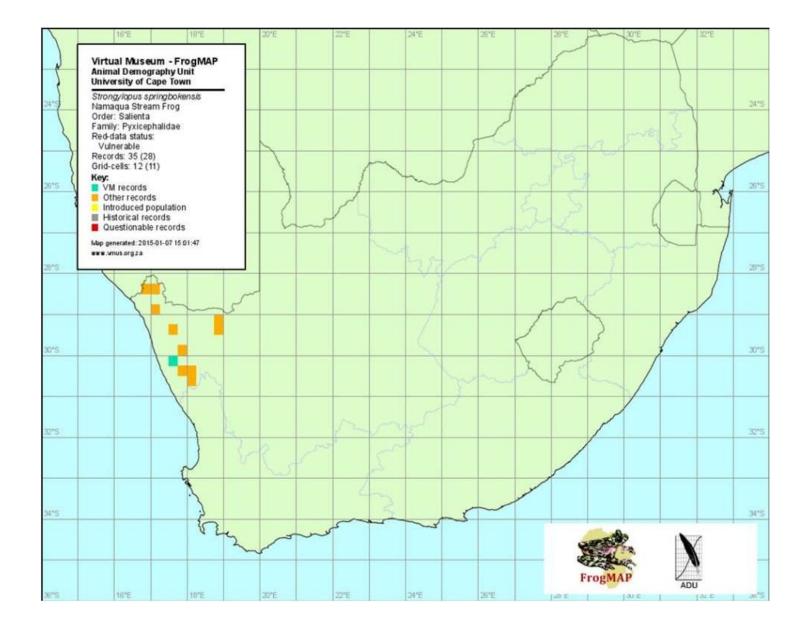
Map 4: SKEP Geographical Priority Areas



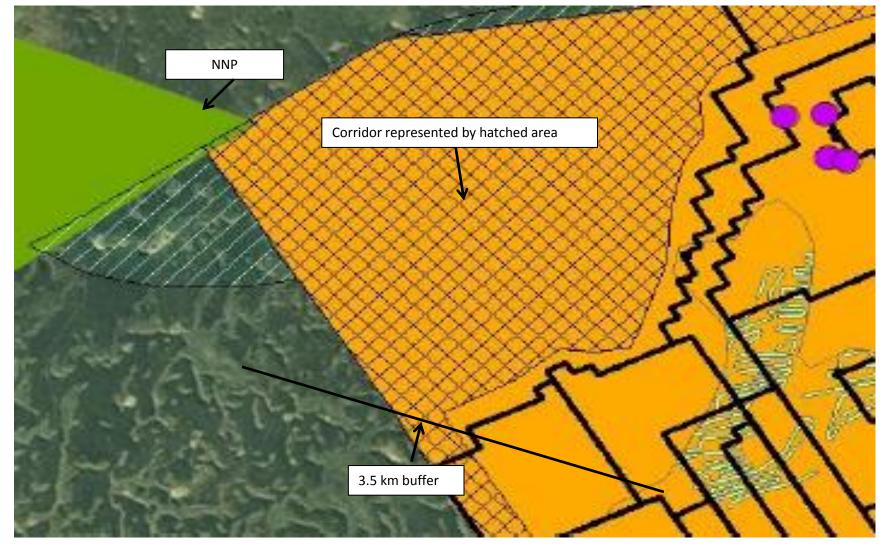
Map 5: SKEP Botanical Priority Areas



Map 6: Distribution of Breviceps macrops



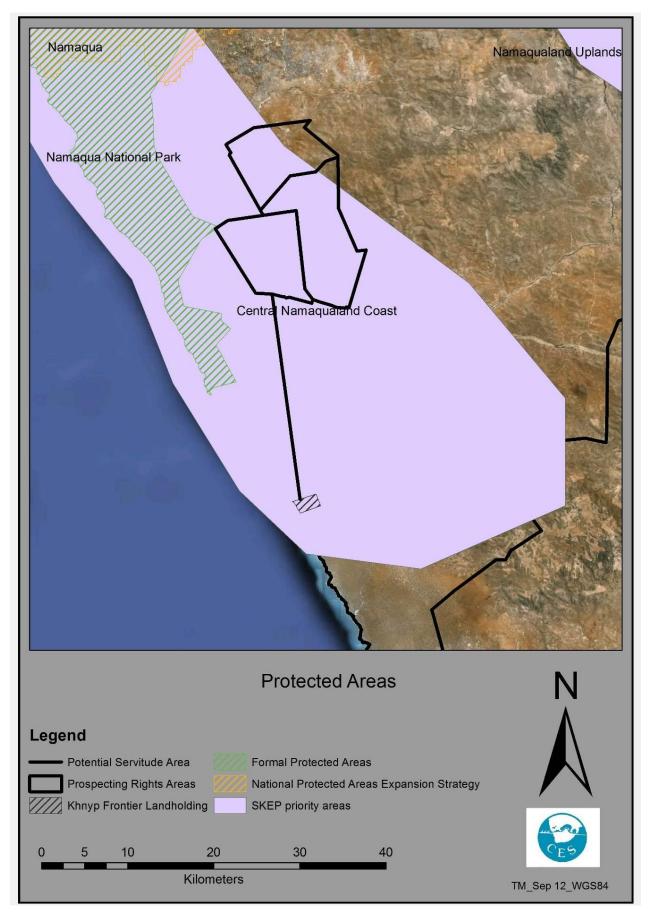
Map 7: Distribution of Strongylopus springbokensis



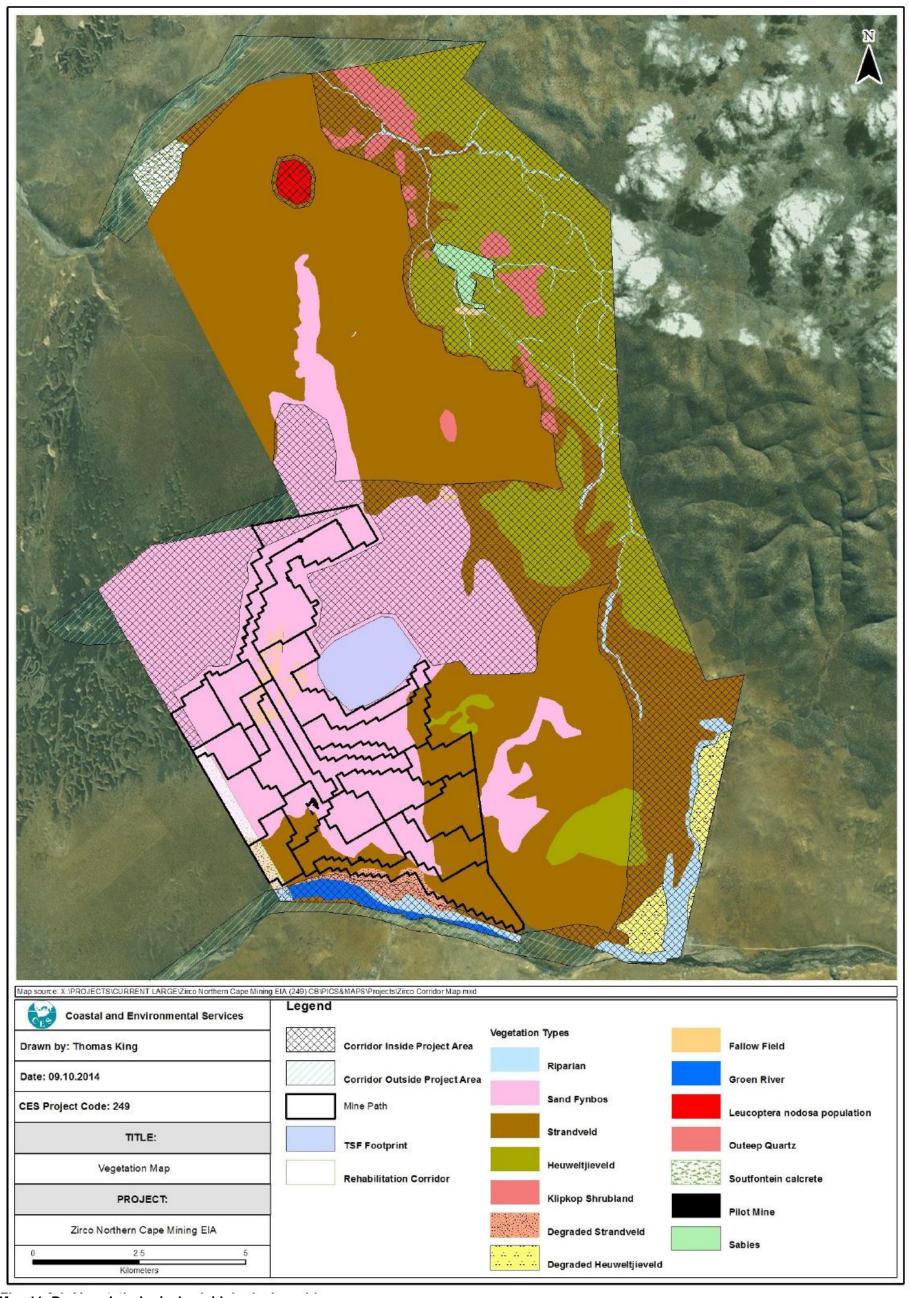
Map 8: Corridor in the area of the project site that borders the NNP



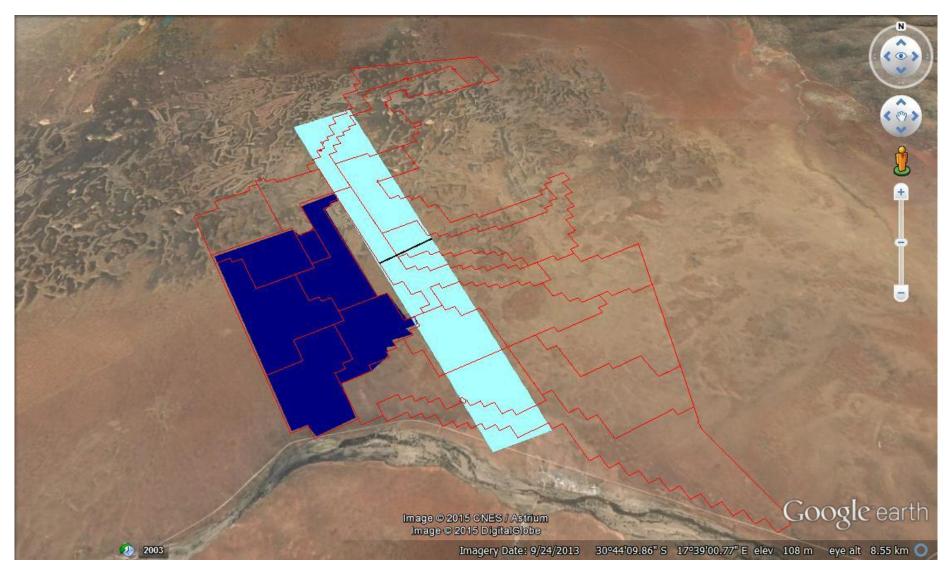
Map 9: Location of permanent pools in the Groen River in proximity to the study site



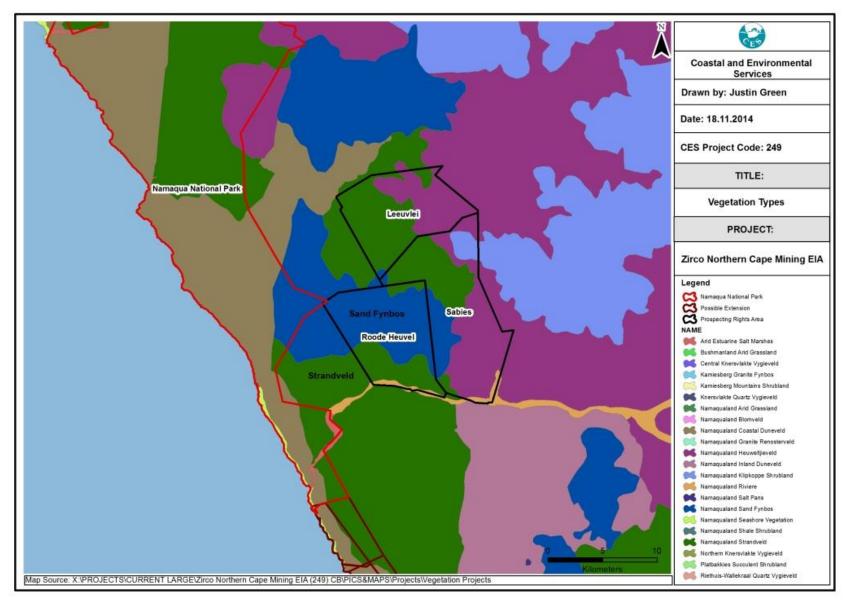
Map 10: BGIS protected and expansion areas



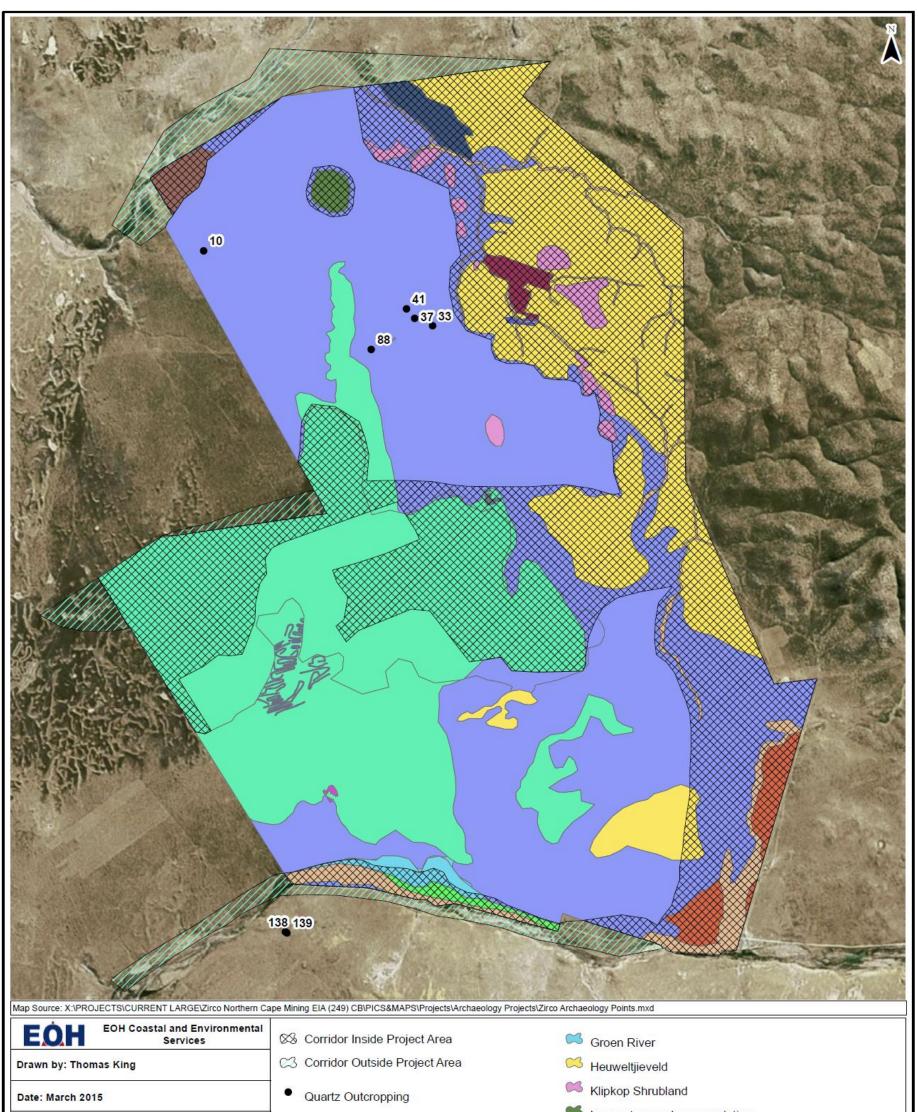
Map 11: Proposed ecological corridors



Map 12: Corridors during the first 5 years of mining

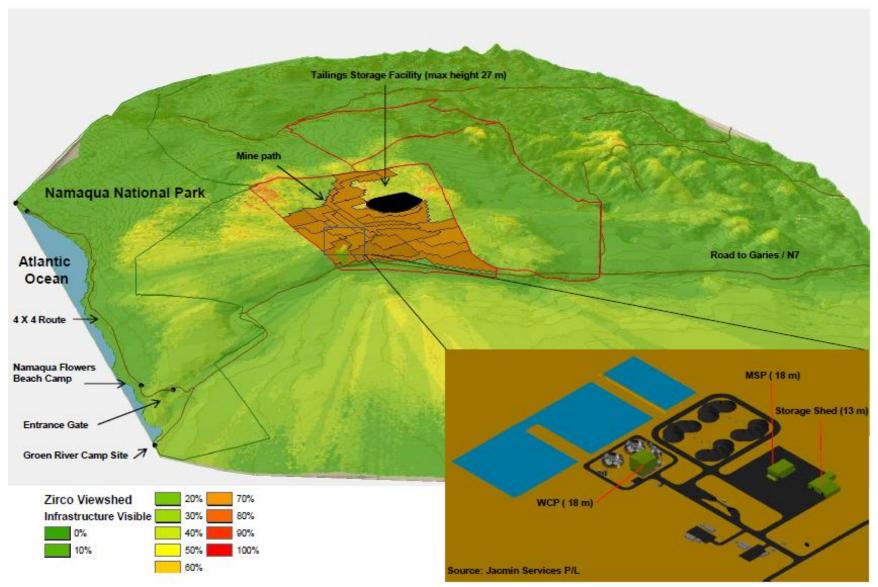


Map 13: Vegetation map showing the vegetation type occurring on adjacent properties



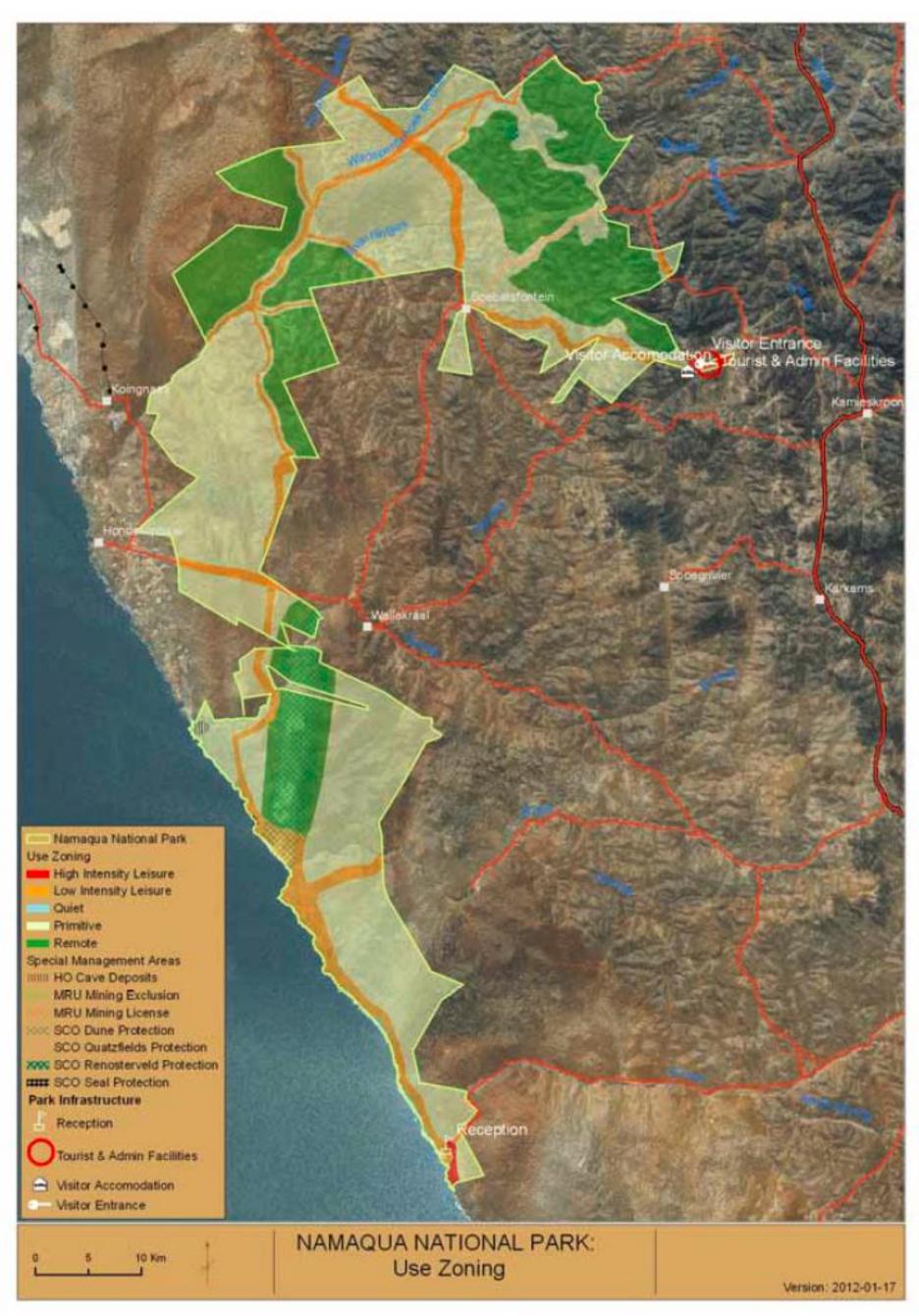
CES Project Code: 249	Zirco Quartz Outcroppings All Areas 5m Buffer	Leucoptera nodosa population
TITLE:	Zirco Quartz Outcroppings All Areas 10m Buffer	Outeep QuartzPilot Mine
Quartz Outcrops	Ziros Magatation and Constituity	Riparian
PROJECT:		Sabies Sand Fynbos
Zirco Northern Cape Mining EIA		Soutfontein calcrete
0 2.5 5 Kilometers	Sallow Field	Strandveld

Map 14: Quartz outcrops of heritage value



Map 15: Viewshed Analysis

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Map 16: Namaqua National Park Zoning

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