

**PUBLIC PARTICIPATION PROCESS IN SUPPORT OF
SCOPING AND EIA PROCESS (VERSION 2)**

ENVIRONMENTAL AUTHORISATION APPLICATION IN SUPPORT OF A PROSPECTING RIGHT APPLICATION WITH BULK SAMPLING BY SAMIN GROUP PTY LTD ON UNSURVEYED STATED LAND 440MT & 442MT, AREA OF GUMBU/MASISI, MAGISTERIAL DISTRICT OF MUSINA, LIMPOPO PROVINCE

(DMR Ref – LP30/5/1/1/2/13050EM)

COMMENTS, ISSUES AND RESPONSE REPORT

(12 January – 29 May 2018)

VERSION 2 – EIA PHASE

DATE OF COMPILATION: 29 MAY 2018

PREPARED BY:

Naledzi Environmental Consultants CC (NEC)
Postnet Suite # 320, Private Bag X 9307, Polokwane, 0700
145 Thabo Mbeki Street, Fauna Park, Polokwane, 0699
Tel: 015 296 3988
Fax: 015 296 4021

1. Introduction

Naledzi Environmental Consultants CC (NEC) has been appointed by SAMIN Group Pty Ltd, to undertake and manage an Environmental Impact Assessment (EIA) Study and obtain environmental authorisation for a prospecting right application on unsurveyed state land 440MT and 442MT in the area of Gumbu/Masisi in the Magisterial District of Musina in the Vhembe District Municipality of Limpopo Province.

SAMIN intends to identify if there are economically exploitable concentrations of Brytes, Chrome ore, Coal, Cobalt, Copper ore, Diamond, Gold ore, Graphite, Iron Ore and Nickel ore minerals within the application area. The company will focus its prospecting on a former recognised mineral deposit of graphite, the old Gumbu Graphite Mine. A further eighteen (18) target areas have been identified for prospecting, to search for graphite, metamorphic diamonds, and alluvial diamonds and gold. Prospecting activities will include drilling, trenching, bulk sampling and exploration pits.

The project is subject to a Scoping and EIA Process under the NEMA EIA Regulations of 2014 as amended under GNR 326 of 7 April 2017. The process comprises a Scoping Phase and EIA Phase with a round of public engagement for each phase. The process is subject to the following in terms of the EIA Regulations:

Scoping Phase

- A Public Participation Process (PPP) in terms of Regulations 40 – 44;
- Scoping Report in terms of Appendix 2;

EIA Phase

- Environmental Impact Report in terms of Appendix 3;
- Environmental Management Programme in terms of Appendix 4.
- Closure Plan

The public participation process forms the corner stone of the Scoping & EIA Process. The process identifies potential interested and affected parties on the project, solicits inputs and comments pertaining to the activity proposed from such parties. The process is conducted in accordance to Regulation 41 to 44 of the NEMA Regulations. The public is provided access to information which is conveyed through the following methods during the Scoping and EIA process:

Scoping Phase

- Distribution of background information documents (BID) available for public review and comment
- Public Meeting / Focus Group Meetings/Information Session
- Draft Scoping Report (DSR) which is made available for public review and comment;

EIA Phase

- Draft Environmental Impact Report & Environmental Management Programme (EIR & EMP) available for public review
- Public Meeting/Information Session/Focus Group Meeting

Public access refers to public review periods on documents prepared for the Scoping & EIA Study. The public registration period on the BID is 30 days and the public review period on the Scoping Report, Environmental Impact Report & EMP is 30 calendar days, respectively.

All the comments and inputs received from I&APs, stakeholders and organs of state during the Scoping&EIA Process are recorded in the Issues and Response Report (IRR). The IRR provides a summary of the issues received and offers a response to the issues raised. As indicated, the public is consulted in two stages of the process and thus the IRR consists of versions. These versions include:

- Version 1 – IRR appended to the updated Scoping Report submitted to DMR
- **Version 2 – IRR appended to the draft EIR for public review**
- Version 3 – IRR appended to the final EIR which is submitted to DMR for approval.

Version 2 of the IRR is appended to the draft EIR & EMPR Report and made available to I&APs for a 30 calendar day public review and commenting period. I&APs are notified of the availability of the reports and are able to access the documentation on the Naledzi Environmental Consultants CC website: www.naledzi.co.za/publicdocuments.

The IRR contains all the comments and inputs received from I&APs, stakeholders and organs of state whether it was raised at meetings, written or verbal, up to the preparation of the draft EIR.

2. Issues and Response Report

Please refer to page 4 for the summary of issues raised by I&AP's during the Scoping& EIA Phase on the project and responses provided thereto.

Issues and responses solicited during the EIA Process include the following:

- written comments submitted by I&APs during the Scoping & EIA Process,
- issues raised during the project public meeting on 7 February 2018 at Gumbu; and
- a Focus Group Meeting on 12 February 2018 with the South African National Defence Force (SANDF);
- A Focus Group Meeting/Key Stakeholders Meeting on 26 April 2018 with the Limpopo Department of Economic Development, Environment & Tourism (LEDET).

Refer to page 26 *Annexure A* for *copies of the written comments as well as completed Comments & Response forms received during the Public Participation Process* to date.

The following comments and issues have been raised during the public registration period on the BID including the public review period on the draft Scoping Report from 12 January to 12 February 2018.

NO	Comment	Interested and Affected Party	Date	Response
2.1 Written Comments received during from 12 January to 12 February 2018				
2.1.1	The Madimbo Corridor where the mining/prospecting activity/activities are planned is still managed by the South African National Defence Force (SANDF). Therefore the SANDF is a directly affected party. It must be noted that the project area is required for military training and therefore is not considered safe for civilian activities.	Hennie Davel Regional Environmental Manager SANDF	5 February 2018 Comment Sheet, Draft Scoping Report	Noted. A Focus Group Meeting took place between NEC and SANDF on 12 February 2018 to discuss the issue. NEC recorded the issues and brought it to the attention of the applicant. It has been recorded in the updated Scoping Report.
2.1.2	Is it necessary for the Limpopo Tourism Agency to attend the public meeting of 7 February 2018? The meeting will deal with environmental aspects and our focus is tourism.	Motlatjo Maselesele Limpopo Tourism Agency Executive Secretary	6 February 2018 Written enquiry via email	The meeting is informative and allows I&APs the opportunity to ask questions and obtain clarity on the project. The meeting is not compulsory. NEC has included the Limpopo Tourism Agency on the project database as the prospecting right area is proposed on land adjacent to the R525 Punda Maria Road leading to the Kruger National Park which is a highly frequented tourist destination.

NO	Comment	Interested and Affected Party	Date	Response
2.1.3	<p>1. Our comments refer to the background information document that was circulated. The draft Scoping Report was not originally circulated, nor is it available on the Naledzi Environmental Consultants website as indicated at the public meeting.</p> <p>2. We sourced the scoping report elsewhere. Please circulate reports via email to I&AP as not all I&AP are able to get to the relevant public libraries to view the report. Ensure that all reports are available on NEC website as indicated.</p> <p>3. The Vhembe Biosphere Reserve aims to bring people and nature together – conserving biodiversity but at the same time recognizing the need for sustainable socio-economic development. We do have some concerns with this particular SAMIN prospecting project – specifically with regards to its location within Critical Biodiversity Areas (irreplaceable) as well as being located just upstream of a World RAMSAR site – the Makuleke Wetlands, which has not been mentioned in your document. As such, we have concerns that SAMIN’s prospecting activities could have detrimental impacts on biodiversity and the aquatic environment upstream of this important area.</p> <p>4.</p>	Cath Vise Coordinator Vhembe Biosphere	12 February 2018 Written comments via email	<p>1. We apologise for this inconvenience. The draft Scoping Report was circulated on 12 and 15 January 2018 to pre-identified interested and affected parties. It was also sent to I&APs who registered after the 12th January 2018 on request. It was also placed at public venues in the project area. We were made aware of the website error by Vhembe Biosphere comments. It was a technical error on the website which resulted in the report not uploading. We have since corrected this. The report is available on the website: www.naledzi.co.za. We will also place the updated Scoping Report with associated appendices as submitted to the DMR for approval on the website.</p> <p>2. Noted. During the EIA Phase the EIR&EMPr will be circulated via email to I&APs, placed at public venues and will be available on the Naledzi website.</p> <p>3. Comment noted. We have recorded</p>

NO	Comment	Interested and Affected Party	Date	Response
	<p>Please see below a list of comments from our stakeholder group:</p> <p>MAPS:</p> <ul style="list-style-type: none"> ▪ The locality map only shows the coordinates of the boundaries of the area under investigation. The map is stated to be compiled at a scale 1 to 50000, this is not true. The map was compiled using the topographic 1 to 50000 scale maps but was not projected to the 1:50000 scale. ▪ Figure 1 was compiled using Google Earth at such a low resolution and high scale that it's almost impossible to determine exactly where their trench lines start and end, and in what sensitive environments these trenches take place in. ▪ The maps also do not show trenches in regard to any sensitive areas, with particular reference to Limpopo Conservation Plan and Vhembe Bioregional Plan; ▪ Figure 1 clearly shows seven demarked areas earmarked for core drilling exploration. Nonetheless under heading 4 you mentioned that the seven sites earmarked for core drilling will only be determined once the trenching phase has been completed. As a result, an additional environmental impact assessment phase should be included into the proposal which will commence after the trenching phase has taken place and the seven 			<p>the concerns in the Scoping Report and updated the Biophysical environment description. A Biodiversity, Ecological and Aquatic Survey will be undertaken as part of the EIA Process to determine the potential impacts on the features.</p> <p>4. MAPS</p> <p>A Site Plan has been included under Appendix 2 in the updated Scoping Report with the location of the 21 areas targeted for prospecting activities. Each site will be 1 hectare in extent. The target area at the old Gumbu Mine will be 1.5 hectares.</p> <p>The updated Scoping Report includes sensitivity maps which indicate the location of target areas in relation to sensitive environments of the Limpopo Conservation Plan and the Vhembe Bioregional Plan.</p> <p>Since the draft Scoping Report, the applicant has identified all the target areas for prospecting. 21 Target areas have been identified and are included on the Site Plan appended under Appendix 2 of the updated</p>

NO	Comment	Interested and Affected Party	Date	Response
	<p>borehole sites have been identified.</p> <p>5.</p> <p>AQUATIC ENVIRONMENT:</p> <p>From the background information under Heading 7 you make no mention of studying the impact of the proposed prospecting on the aquatic environment. First and foremost, all the proposed trench lines run north-south starting at the Limpopo River. The main question of concern is at what distance from the Limpopo River Riparian Zone do they intend to start their invasive trenching?</p> <p>How do they intend avoiding numerous ephemeral streamlets which cross their trench lines?</p> <p>The above-mentioned concerns are of critical importance as they could have a detrimental effect on the Makuleke Wetlands declared a Ramsar Site downstream from the proposed prospecting area.</p> <p>6.</p> <p>REHABILITATION CONCERNS:</p> <p>Concerns were raised regarding mining and or prospecting activity where rehabilitation took place reverting the site back to pre-prospecting state (it is impossible). As this prospecting application also targets diamonds, the above, is of extreme concern as alluvial diamonds are known to occur in the</p>			<p>Scoping Report. No additional EIA Process would be/is required. All prospecting activities are addressed within this EIA Process.</p> <p>5. AQUATIC ENVIRONMENT</p> <p>Noted. The impact on natural water bodies / the aquatic environment was an identified impact listed in the draft Scoping Report under identified impacts.</p> <p>Prospecting target areas, based on SAMINS's provided locations, would be located between 400 metres to 1km south of the Limpopo River riparian Zone. There is only 1 target area, no 21 which is located on the north western extreme of the site on the southern banks of the Limpopo River. This target site is however too close and would need to remain 100m away from the river or above the 1: 100 floodline whichever is greater.</p> <p>Target areas in general would need to remain 100m from any drainage line/water course. Yet, there are</p>

NO	Comment	Interested and Affected Party	Date	Response
	<p>sedimentary deposits of the Limpopo River.</p> <p>7. CONSULTING REQUIRED PLANS: The Background Information Document does not take into account required sensitive areas – in particular reference to Limpopo Conservation Plan and the Vhembe District Bioregional Plan which has recently been released. Also the Scoping Report does not make reference to the UNESCO Vhembe Biosphere Reserve or Vhembe Bioregional Plan. Of critical importance is the Critical Biodiversity Areas that this project falls within.</p> <p>The exact location of trenches and boreholes with respect to these plans has not been indicated, and this should be done to facilitate further informed response.</p> <p>This is an incredibly sensitive area and they must be made to take account of all regulations, plans and knowledge, especially considering the riparian forest and pans.</p> <p>SOCIAL IMPACTS: We did not see reference to the potential negative social impacts associated with development. This would include migration of people into the area, especially contract workers</p>			<p>currently 4 target areas requiring exploration pits (2mx2mx2m deep/pit) in search of alluvial diamond to be located in old river channels. This will be confirmed in the draft EIA Report.</p> <p>A Biodiversity, Ecological and Aquatic Survey will be undertaken as part of the EIA Process to determine the potential impact of prospecting activities on aquatic environments/ drainage lines and the adjacent Maluleke Wetland. The findings of the survey will be included in the Environmental Impact Report.</p> <p>6. REHABILITATION CONCERN</p> <p>Based on the 21 areas targeted for prospecting, none of the target areas are located within the Limpopo River. Target areas prone for exploration will take place in old river/drainage channels on site. Target area no 21 is the only target area located within the Limpopo River Riparian zone. This would</p>

NO	Comment	Interested and Affected Party	Date	Response
	<p>from elsewhere or people coming to the area in search of work. Possible social impacts include an increase in crime, with particular reference to violent crimes against women.</p> <p>In addition, there is also potential impact on roads due to increased traffic to the area – with risk of both wildlife and livestock (free roaming in this environment) being hit by vehicles with associated impact on livelihoods.</p> <p>Also refer to air quality impacts, and associated potential health implications from increased dust etc. in the air.</p> <p>I hope these comments will assist you with your Scoping Report going forward, to ensure that all concerns are taken into account when decision making takes place regarding this application.</p>			<p>need to be reconsidered / alternative considered due to the target area sensitivity. In general target areas need to remain 100m away from the river or above the 1:100 year flood line, whichever is greater.</p> <p>7. CONSULTATING REQUIRED PLANS</p> <p>Noted. The Scoping Report has been updated to include the UNESCO Vhembe Biosphere Reserve and Vhembe Bioregional Plan under the description of the Biophysical environment and under Policy and Legislative requirements.</p> <p>Sensitivity maps have been included in the updated Scoping Report which indicates the position of target areas in relation to priority biodiversity areas identified in the Limpopo Conservation Plan and Vhembe Bioregional Plan.</p> <p>8. SOCIAL IMPACTS</p> <p>Please note this is an application for a prospecting right, not a mining license. The social impacts referred</p>

NO	Comment	Interested and Affected Party	Date	Response
				<p>to are related mostly to development and operation of a mine. For now the applicant is only seeking to conduct a prospecting programme to identify if there is a viable mineral deposit and at which quality and quantity it would be available within the application area.</p> <p>The potential impacts of increased traffic, dust increase will be negative social impacts are noted and will be considered in the EIA Report.</p>
2.1.4	After reviewing the Background Information Document for the prospecting right application by SAMIN around Gumbu, we identified the need to conduct a site inspection before commenting. Please confirm if a site can take place on 26 February 2018. Kindly inform us if the site inspection can be scheduled.	M.P. Taka Department of Water & Sanitation Scientist: Water Use Authorisation, Limpopo North West Proto CMA	14 February 2018 Emailed request to NEC	A site inspection will be scheduled with the Department of Water & Sanitation to the project site, once the EIR is available for comment.
2.1.5	We have been made aware that there is currently an EIA process underway for the prospecting right in the Gumbu owned Madimbo area. What is the current status of the EIA process?	Piet Theron Great Limpopo Transfrontier Conservation Area (GLTFCA) International	15 February 2018 Written comments via email	The EIA Process is currently in the Scoping Phase in which issues are scoped to focus the EIA Study on. A public registration and comment period on the Background Information Document and draft Scoping Report was provided from 12 January to 12 February 2018. A public meeting took place at the

NO	Comment	Interested and Affected Party	Date	Response
		Coordinator		<p>Gumbu Primary School on 7 February 2018 to facilitate further comments on the project from I&APs.</p> <p>We are currently updating the Scoping Report for submission to the DMR in on order to get approval to continue to the EIA Phase of the process. A second round of public consultation will follow in which the EIA Report and Environmental Management Programme would be made available for public review.</p> <p>NEC sent the GLTFCA the Naledzi website link to access all the public documents (BID, draft Scoping Report) for the prospecting right application by SAMIN.</p>
2.1.6	One of the local community members told me that SAMIN has already started with the exploration drilling in the area - is this true?	Piet Theron Great Limpopo Transfrontier Conservation Area (GLTFCA) International	15 February 2018 Written comments via email	SAMIN has not started with any exploration drilling. The contracted Geologist has gone to site to determine the target areas for prospecting, based on their surface geological mapping and literature review of the area. This was conducted in January 2018.

NO	Comment	Interested and Affected Party	Date	Response
		Coordinator		
2.2 Comments and Responses recorded at the Public Meeting of 7 February 2018				
2.2.1	<p>Why was the Gumbu Mine closed down?</p> <p>The study area is very dry, where will the mine obtain water from?</p> <p>Will the mine abstract water from the Limpopo River? If so how many litres?</p> <p>What is the total area to be used for mining /prospecting?</p>	Sandra Visagie Kruger National Park Section Ranger - Pafuri	7 February 2018 Scoping Phase Public Meeting Gumbu	<p>Zimbabwe fights were the reason behind mine closure. Employees were no longer safe from terrorist attacks.</p> <p>The application submitted to the DMR is for a prospecting right not a mining license. The prospecting activities will not require much water, mainly for domestic purposes. Any water requirements would be brought to site by the contractors.</p> <p>SAMIN will prospect on an area of 4000 hectares.</p>
2.2.2	We as a community have a problem with the Kruger National Park, since it does not employ local people. We would like to request the SAMIN Group to employ local youth during its operations at the project site.	Samuel Sigebe	7 February 2018 Scoping Phase Public Meeting Gumbu	<p>The current application by Samin Group is for a prospecting right. There are limited prospects for job opportunities during the prospecting programme.</p> <p>Job opportunities would only be created if a mine is established and</p>

NO	Comment	Interested and Affected Party	Date	Response
				operational.
2.2.3	The application area was claimed back for development and we want the proposed mining project to be approved in order for it to create job opportunities for the local people. The SANDF does not employ local people.	Munzhelele Vhulahani	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.4	The Lord must open the way for this proposed development.	Luvhimba David Mphodo	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.5	We welcome the project because it will benefit the community.	Nndwamato Thetshelesani	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.6	All community members must stand up and applaud to show that we welcome the proposed project.	Mr Mudau	7 February 2018 Scoping Phase Public Meeting Gumbu	The motion was supported and community members applauded.
2.2.7	The project will assist to combat crime caused by unemployment in the area, since the project will employ people.	Tshikovhi Humbulani	7 February 2018 Scoping Phase Public Meeting Gumbu	The current application by Samin Group is for a prospecting right. There are limited prospects for job opportunities during the prospecting programme. Job opportunities would only be

NO	Comment	Interested and Affected Party	Date	Response
				created if a mine is established and operational.
2.2.8	SAMIN should continue with the project. The EIA Process is timeous and the community must be patient. The title deed issues need to be addressed so that the community can take over from the SANDF.	Mahwasane Mudzweda	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.9	What will be the planned mining period and how many people will be employed?	Tshimangadzo Brestons	7 February 2018 Scoping Phase Public Meeting Gumbu	The current application is for a Prospecting Right not a mining licence. The question relates to actual mining. The mining period and number of people to be employed if the mine is developed is unknown at this stage since the quantities of minerals will only be known after the prospecting phase.
2.2.10	I would like SAMIN Group to proceed with the proposed development.	Mphondo Agnes	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.11	I would like this project to proceed. Four groups of mining companies have tried to prospect in the area before, however did not succeed. I worked with and lived with Elmer's father.	William Gumbu	7 February 2018 Scoping Phase Public Meeting	Comment noted.

NO	Comment	Interested and Affected Party	Date	Response
			Gumbu	
2.2.12	I never thought that there were still white people who did not want development. The Kruger National Park does not employ the youth. The community believes that SAMIN mine will bring employment.	Phaswana Itani	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment Noted. The current application by Samin Group is for a prospecting right. There are no prospects for job opportunities during the prospecting programme. Job opportunities would only be created if a mine is established and operational.
2.2.13	Many people will still try to intimidate SAMIN Group and discourage them from prospecting. The unexploded bombs the SANDF state still to be scattered onsite have been swept away. I was part of the workforce who swept the area for UXO's.	Sidzhie Daniel	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.2.14	Sammin Group should consult the environmental and water departments since they can frustrate mining companies. I experienced this whilst working for Vele Mine.	Moyana Nnduvheni Philemon	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted. The Department of Water & Sanitation and Limpopo Department of Economic Development, Environment and Tourism are being consulted as part of the EIA Process.
2.2.15	Can a community member without a university qualification be employed in a higher position during the mine operation stage?	Magovha Pfarelo	7 February 2018 Scoping Phase Public Meeting Gumbu	RR from SAMIN responded, once a mine is established, people would be employed as per their qualifications and expertise. There will be an entity

NO	Comment	Interested and Affected Party	Date	Response
				which would deal with employment issues. The lower income/poor people will be employed in numbers.
2.2.16	<p>We were excited to hear about the proposed development. The community members should not fight amongst each other and take account of groups which will oppose the proposed development. If any of the community members do not understand the project detail provided, they should ask questions for clarity as soon as possible to avoid frustrations with the proposed development.</p> <p>Sandra Visagie from the Kruger National Park protects animals. The community must let her continue with her job, but she must not frustrate the community by being against the proposed development. The SANDF will also try to frustrate the community with the issue of unexploded bombs still present on the project site. Drilling companies only drill up to 10m or 15m for boreholes which shows that there is more water around Gumbu area, but water will be monitored as per Mrs. Visagie's input.</p>	M.J. Mariba DA Councillor	7 February 2018 Scoping Phase Public Meeting Gumbu	Comment noted.
2.3 Issues raised by SANDF during a Focus Group Meeting on 12 February 2018				
2.3.1	<p>The SANDF oppose the proposed prospecting right application due to the following reasons:</p> <ul style="list-style-type: none"> ▪ The land has been used for military training since 	Lt Cl. Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	All comments have been noted. DM from NEC responded the aim of the public participation is to record all issues from interested and affected

NO	Comment	Interested and Affected Party	Date	Response
	<p>1960's and is currently registered under the Department of Public Works.</p> <ul style="list-style-type: none"> ▪ SANDF spent R 100 billion to sweep/clean the area from land mines so land could be used for agricultural purposes. ▪ There are still landmines present in the area, to depths of 4m below ground. A civilian was killed whilst handling a land mine for the purpose of collecting it for scrap metal. The area is not safe yet. ▪ The Madimbo Corridor is the only base available to the SANDF for training. There is continuous training in the corridor. ▪ The project site is a declared Nature Reserve ▪ The project area still needs to be cleaned / swepted for further concealed unexploded bombs (UXO's). ▪ Rumours indicate ammunition was dumped into the old Gumbu Mine. ▪ Only the western side from Beacon 5 towards Musina would have been given back to the community, as it has been cleaned from all UXO's ▪ Vigorous training is still undertaken on the eastern side of Beacon 5. ▪ A land claim has been lodged against the project site, and is yet to be finalised. 			<p>parties and to address such through the EIA Process to assist the DMR in decision making.</p> <p>NEC is aware that the prospect site is registered under the National Department of Public Works (DPW). The DPW is a registered I&AP on the project database. NEC informed the DPW, Property Manager of Facilities, Mr. Yuza Siwela of the application. The project Background Information Document, Notification letter including the availability of the draft Scoping Report was emailed to the DPW on 16/01/2018.</p> <p>NEC takes note of the project site being a nature reserve; it falls within the Vhembe Biosphere Reserve which is a UNESCO biosphere reserve. The impact on biodiversity will be considered in the EIA Process.</p> <p>The unsafe nature of the eastern portion of the project site will be</p>

NO	Comment	Interested and Affected Party	Date	Response
				<p>recorded in the Scoping Report and made known to the applicant and decision making authority.</p> <p>NEC has obtained Land Claim results on 10/01/2018 from the Commissioner on Restitution on Land Rights. The results stipulate the claimants of the land are Gumbu, Masisi, Tshenzelani, Sigonde Community, Mutale Community. Yet it states the claim has been settled. NEC will reconfirm the status with the Commissioner.</p>
2.3.2	The National Department of Public Works, Mr Siweya needs to be notified of the application since the DPW is the current landowner of the area under claim.	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	Please refer to point 2.3.1 for response.
2.3.3	What volumes of sampling will be taken at the site?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	<p>The legal maximum allowed volume for bulk sampling is 500 000 tons/annum. The old Gumbu Mine is the only current target area selected for bulk sampling at 500 000 tons/annum.</p> <p>The other target areas for</p>

NO	Comment	Interested and Affected Party	Date	Response
				prospecting would include trenching, with an extent of 1m x 1m x 20m long/ trench. Most target areas will comprise 5 trenches. The volumes of material excavated from each target site would vary from 30m ³ up to 280m ³ . The average volume of excavation would be 100m ³ .
2.3.4	Would a mining permit be applied for after the prospecting phase?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	The applicant would apply for a mining permit from the DMR should the prospecting programme yield positive results.
2.3.5	What will be implemented to close the trenches opened during bulk sampling?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	A Rehabilitation Plan will be prepared with measures to be implemented at the end of the prospecting phase.
2.3.6	Will sampling of soil be done on site?	Lt Cl Hennie Davel SANDF Regional EM	Verbal comment FGM 12/02/2018	SAMIN Group intends sampling the soils at labs.
2.4 Issues raised during the commencement of the EIA Phase				
2.4.1	Your attention is drawn to the fact that the Madimbo Corridor is a proclaimed nature reserve and prospecting and mining activities are prohibited in protected areas. The application	Lt Cl Hennie Davel SANDF Regional EM	Emailed comment 11/03/2018	Noted. The protection status of the land has been brought to the attention of the applicant. The

NO	Comment	Interested and Affected Party	Date	Response
	area was declared as the Matshakatini Nature Reserve under the Transvaal Nature Conservation Ordinance of 1983.			National Environment Management Protected Areas Act of 57 of 2003 (NEMPAA) prohibits the activity in a protected area. NEC and Samin engaged with the Limpopo Department of Economic Development, Environment & Tourism in this regard on 26 April 2018. The applicant wishes to continue with the application and motivate de-proclamation of the land with the consent of the Vhembe CPA.
2.4.2	Official comments from the SANDF Ammunition Division are still pending for submission to NEC. But we bring it to the attention of NEC that the Madimbo Corridor is not safe for civilian activity or prospecting activities, aside from the land's protection status. SANDF undertakes training within military corridor. Also there is a major safety risk due to the existence of UXO's within the military corridor. The SANDF has only conducted limited sweeping and clearing of UXO's in some of the area in the corridor, up to a depth of 1 metre. If the land is to be used for prospecting clearing/sweeping for UXO's is required up to a depth of 4 metres. This sweeping exercise will come with a significant cost. Hence prospecting	Captain (SAN) Adri Liebenberg SANDF	Verbal Comment Via telephonic conversation 20 April 2018	Comment noted. NEC has brought this to the attention of the applicant. The applicant has requested the SANDF to provide a list of requirements that need to be undertaken to make the area safe for prospecting.

NO	Comment	Interested and Affected Party	Date	Response
	in this area is not possible. It is not safe to conduct prospecting activities as it may result in machinery unearthing and detonating UXO's and this is a major safety risk for the Defence Force.			
2.5 Focus Group Meeting with LEDET on 26 April 2018 regarding the Protection Status of the application area (LEDET, Samin, NEC and Vhembe CPA)				
2.5.1	<p>Lt Col Hennie Davel (SANDF) informed LEDET of the application lodged against the proclaimed nature reserve. NEMPAA prohibits prospecting and mining within protected areas. LEDET communicated the proclamation to NEC.</p> <p>The only avenue available to the applicant to prospect/mine on the land is to de-proclaim the nature reserve. The MEC for LEDET is mandated to de-proclaim protected areas. The applicant would need to convince the MEC to de-proclaim the land to allow proposed prospecting activities.</p>	Christiaan Visagie LEDET: Protected Areas Division	Verbal Comments FGM 26 April 2018	<p>The project BID and Scoping Report was submitted to LEDET: Environmental Impact Management as notification. The documents were available for public review from 12 January until 12 February 2018.</p> <p>Noted. The proclamation was received and NEC advised the applicant accordingly.</p> <p>Noted.</p>
2.5.2	When was the application area proclaimed as a nature reserve? Is the entire area affected by the proclamation? In 2004 the land was restored to the Vhembe CPA. LEDET must	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	The land was declared in 1983 and proclaimed in 1992. The entire Madimbo Corridor is affected. A

NO	Comment	Interested and Affected Party	Date	Response
	provide the CPA with a copy of this proclamation.			copy of the proclamation was emailed to attendees along with the minutes of the FGM of 26 April 2018.
2.5.3	How is the SANDF still able to conduct military training within the nature reserve?	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	NEC response: The SANDF is managing the land as a conservation area and military corridor. SANDF is managing the corridor through a 99 year lease agreement with the National Department of Public Works.
2.5.4	What are the implications of this proclamation if the Vhembe CPA is given their land back? The claim was already finalised in 2004.	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	NEC note: According to the DRDLR the communities will be entitled to the land yet not able to live and cultivate it. The land will remain protected as a conservation area and military corridor. The intent is to compensate the claimants and continue with the use of the land as a military training ground. Christiaan Visagie from LEDET responded that issues raised by SAMIN and Vhembe CPA should be used as motivation to convince the

NO	Comment	Interested and Affected Party	Date	Response
				MEC to de-proclaim the land.
2.5.5	How was it possible in 2008 and 2011 for prospecting rights to be issued to mining companies within the proclaimed area? Why did LEDET not raise this issue then?	Caroline Mulaudzi Director – Samin Group	Verbal Comments FGM 26 April 2018	Christiaan Visagie responded LEDET was not aware of the application in 2008 and 2011. The DMR is the competent authority who issued the prospecting right to the mining companies. Samin is to direct these issues in writing to LEDET so the relevant divisions can provide responses.
2.5.6	There are 400 proclaimed nature reserves from 1960 onwards that have issues with the current land use and agriculture is an example. LEDET has legal challenges to solve the issues around the status of these areas.	Christiaan Visagie LEDET: Protected Areas Division	Verbal Comments FGM 26 April 2018	Noted.
2.5.7	What did LEDET do regarding these land use issues in protected areas?	R.T. Rambiyana Member of the Vhembe CPA	Verbal Comments FGM 26 April 2018	Christiaan Visagie from LEDET responded that nothing has been done about the verification of areas, as legal opinion is awaited from DEA. Fact is NEMPAA recognises these areas as protected and development is prohibited in protected areas.

NO	Comment	Interested and Affected Party	Date	Response
2.5.8	There are no economic activity or job opportunities in the project area. Communities are suffering as a result. The leadership needs to come to the party.	Elmer Uys Director – Samin Group	Verbal Comments FGM 26 April 2018	Christiaan Visagie from LEDET responded Samin should send these motivations directly to the MEC. The MEC will request the different units within LEDET to respond. Samin has a valid argument. De-proclamation of the area will be beneficial to the local communities. LEDET is not against development. It understands people require job opportunities and economic development, yet has to abide by the law to protect the environment. LEDET supports sustainable economic development.

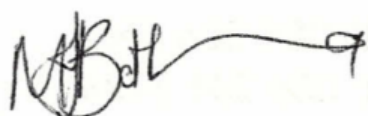
3. Conclusion

This Issues and Response Report has been prepared by Naledzi Environmental Consultants CC for the the prospecting right application by Samin Group Pty Ltd in respect of unsurveyed state land 440MT and 442MT located in the Madimbo Corridor at Gumbu, Magisterial District of Musina in the Vhembe District Municipality of Limpopo Province.

The Issues and Response Report has been updated on 8 and 29 May 2018 and it records all written issues and responses received from interested and affected parties during the Scoping&EIA Process. It is the second issue or Version 2 attached to the draft EIR & EMPR available for 30 days public review and comment. Upon lapse of the comment period all issues and responses will be incorporated into the final EIR & EMPR for submission to the Department of Mineral Resources for decision making.

The content of this IRR has also been made available to I&APs at public venues stated in the EIR Report on the Naledzi Environmental Consultants CC website: www.naledzi.co.za/publicdocuments

The report has been prepared by:



.....
Marissa Botha (Pr.Sci.Nat)
Environmental Assessment Practitioner
For Naledzi Environmental Consultants CC
Registered Professional Natural Scientist with SACNASP (registration number 117526)

**WRITTEN COMMENTS RECEIVED FROM I&APS DURING
SCOPING & EIA PROCESS**