

SITE SENSITIVITY VERIFICATION (“SSV”) REPORT: PROPOSED PROSPECTING FOR ALLUVIAL DIAMONDS WITH BULK SAMPLING ON A TOTAL AREA OF APPROXIMATELY 121HA ON A PORTION OF PORTION 4 RIETFONTEIN EXTENSION 151 AND A PORTION OF PORTION 4 GRAAUW DUINEN 152, VANRHYNSDORP (WC 50/1/1/2/10454/PR)

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INTRODUCTION:

This SSV Report was undertaken in terms of the *Protocols for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes* (hereinafter referred to as “the Protocols”) as per Government Notice No. 320 (published in Government Gazette No. 43110 on 20 March 2020)¹. These Protocols, with effect from 09 May 2020 must be complied with for every new application submitted on the effective date and thereafter. According to the Protocols, the Environmental Assessment Practitioner (“EAP”) must verify the current use of the proposed

site for development as well as the environmental sensitivity of the proposed site in terms of the Screening Tool to determine the need for specialist inputs in relation to the Themes (and proposed specialist assessments) included in the Protocols.

METHODOLOGY:

The SSV Report was compiled using desktop studies [that include using the web-based Screening Tool and GoogleEarth) to investigate, identify, and evaluate the potential environmental impacts of the proposed alluvial diamonds prospecting and bulk sampling of an approximate total of 121ha between the low-water and high-water mark of the sea on Portion 4 of the Farm Rietfontein Extension No 151 and Portion 4 of the Farm Graauw Duinen No. 152, Vanrhynsdorpronment. The SSV Report was compiled by the EAP (Mr. Bernard de Witt).

AIM OF THE SSV REPORT:

The aim of the SSV Report is to;

- Verify land use and Theme sensitivities as identified by the DEA Screening Tool;
- Confirm whether or not the need exists for the specialist assessment(s) indicated in the Screening Tool Report; and
- Should the need for a specialist assessment be disputed, provide motivation as to why the proposed specialist assessment is unwarranted for the proposed development.

This will assist in providing a good understanding of the situation prevailing on the proposed site.

SITE DESCRIPTION:

The proposed site is an undeveloped strip of land that is located between the low-water and the high-water mark of the sea on Portion 4 of the Farm Rietfontein Extension No. 151 and Portion 4 of the Farm Graauw Duinen No. 152, Vanrhynsdorp. The said properties are zoned Agriculture, but no agricultural activity takes place thereon. The proposed site is mainly informally by for camping during the crayfish season and for kelp collection. A two-lane farm track on the proposed site exists that connects to the N7 National Road and the R363 Regional Road..



Figure 1: Aerial view of the proposed site as a red polygon and the surrounding area

Table 1. Themes and associated sensitivity

No	Theme	Sensitivity as per the Screening Tool	Confirm/ dispute sensitivity rating of Screening Tool	Verification of site sensitivity
1	Agriculture	Medium	Dispute	<p>The proposed prospecting and bulk sampling will be restricted to the area located between the low-water and high-water mark of the sea and to the areas of the proposed site that are devoid of vegetation as a result of having been used as informal campsites. A two-lane farm track exists for access to the proposed site and this is the only access to the proposed site that will be used for the proposed development.</p> <p>The EAP is therefore of the view that the agricultural value of the proposed site will not be affected by the</p>

				proposed development in any kind of significant way and so the sensitivity rating of Medium that has been given by the Screening Tool regarding the Agriculture Theme should rather be a rating of Not Applicable .
2	Animal Species	High	Confirm	A terrestrial biodiversity specialist will be appointed to conduct an on-site terrestrial biodiversity investigation that includes <i>inter alia</i> , the Animal Species Theme and Plant Species Theme.
3	Aquatic Biodiversity	Very high	Dispute	The proposed site is close to some wetlands of the Sout River that may be affected by the proposed prospecting and bulk sampling. An aquatic biodiversity specialist will therefore be appointed to conduct an aquatic biodiversity specialist investigation.
4	Archaeological and Cultural Heritage	Low	Confirm	The proposed development will change the character of an approximately 121ha area and in accordance with the National Heritage Resources Act, this requires that a heritage impact specialist has been appointed to conduct an on-site archaeological and palaeontological impact study. The heritage impact specialist will therefore be appointed.
5	Civil Aviation	Low	Dispute	The EAP is of the opinion that the Screening Tool has given an inaccurate sensitivity rating of High for the Civil Aviation Theme, as the proposed site is undeveloped coastal land with no features of any kind of civil aviation significance. A specialist study relating to the sensitivity of the proposed site regarding the Civil Aviation Theme is therefore unwarranted. Comment on the application will be requested from the Civil Aviation Authority instead of putting the applicant through the expenses of appointing an expert to conduct a specialist study concerning the Civil Aviation Theme.
6	Defence	Low	Dispute	The EAP is of the opinion that the Screening Tool has given an inaccurate sensitivity rating of Very high for the Defence Theme, as the proposed site is approximately 70% occupied by an informal settlement that significantly limits the sensitivity of the proposed site from a Defence Theme point of view. A specialist study relating to the sensitivity of the proposed site regarding the Defence Theme is therefore unwarranted. Comment on the application will be requested from the National Department of Defence instead of putting the applicant through the expenses of appointing an expert to

				conduct a specialist study concerning the Defence Theme.
7	Palaeontology	Very high	Dispute	The proposed development will change the character of the more than 5000m ² proposed site and in accordance with the National Heritage Resources Act, a heritage impact specialist will be appointed to conduct an on-site archaeological and palaeontological impact study.
8	Plant Species	Medium	Confirm	A terrestrial biodiversity specialist has been appointed to conduct an on-site terrestrial biodiversity specialist investigation that includes <i>inter alia</i> , the Plant Species Theme.
9	Terrestrial Biodiversity	Very high	Confirm	A terrestrial biodiversity specialist will be appointed to conduct an on-site terrestrial biodiversity investigation that includes <i>inter alia</i> , the Animal Species Theme and Plant Species Theme.

Table 2. Specialist assessments specified in the Screening Tool Report

No	Proposed Specialist Assessment	Verification of Site Sensitivity and Motivation on the Need for a specialist Investigation
	Landscape/Visual Impact Assessment	Bulk sampling will be conducted in a single trench at a time and the trench will be rehabilitated by backfilling before the next trench is excavated for bulk sampling. The visual disturbance will be kept at a minimum in this way and a landscape/ Visual Impact Assessment is therefore not warranted and a specialist will not be appointed to compile the assessment.

1	Agriculture	<p>The proposed prospecting and bulk sampling will be restricted to the area located between the low-water and high-water mark of the sea and to the areas of the proposed site that are devoid of vegetation as a result of having been used as informal campsites. A two-lane farm track exists for access to the proposed site and this is the only access to the proposed site that will be used for the proposed development.</p> <p>The EAP is therefore of the view that the agricultural value of the proposed site will not be affected by the proposed development in any kind of significant way and so the sensitivity rating of Medium that has been given by the Screening Tool regarding the Agriculture Theme should rather be a rating of Not Applicable.</p>
2	Archaeological and Cultural Heritage	<p>The proposed development will change the character of the approximately 44ha proposed site and in accordance with the National Heritage Resources Act, this requires that a heritage impact specialist has been appointed to conduct an on-site archaeological and cultural heritage assessment. The heritage impact specialist has therefore been appointed.</p>
3	Palaeontological Impact Assessment	<p>The proposed development will change the character of the approximately 44ha proposed site and in accordance with the National Heritage Resources Act, this requires that a heritage impact specialist has been appointed to conduct an on-site palaeontological impact assessment. The heritage impact specialist has therefore been appointed.</p>
4	Terrestrial Biodiversity Assessment	<p>A specialist will be appointed to conduct the Terrestrial Biodiversity Assessment</p>
5	Aquatic Biodiversity Impact Assessment	<p>A specialist will be appointed to conduct the Aquatic Biodiversity Assessment</p>
6	Marine Impact Assessment	<p>A specialist will be appointed if the State Departments and Organs of State that administer laws relating to the seashore deem it that a Marine Impact Assessment is required for the proposed development.</p>
7	Hydrology Impact Assessment	<p>An aquatic biodiversity specialist will be appointed to conduct a specialist investigation that includes inter alia, the potential hydrological impacts of the proposed prospecting with bulk sampling. A separate Hydrological Impact Assessment will not be conducted.</p>
8	Plant Species Assessment	<p>A specialist will be appointed to conduct a Terrestrial Biodiversity Assessment and the assessment will include the Plant Species Theme. A separate assessment of the Plant Species Theme is unwarranted and is not going to be conducted.</p>
9	Animal Species Theme	<p>A specialist will be appointed to conduct a Terrestrial Biodiversity Assessment and the assessment will include the Animal Species Theme. A separate assessment of the Animal Species Theme is unwarranted and is not going to be conducted.</p>

10	Socio-economic Impact Assessment	The proposed prospecting with bulk sampling is small and short-lived and can therefore not cause any significant positive nor negative socio-economic impacts. It is only if the results of the proposed prospecting with bulk sampling warrant the establishment of a mine on the proposed site and a mining application is lodged that a Scio-economic Assessment would be warranted. A specialist will not be appointed for the proposed prospecting with bulk sampling.
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All the Specialist Assessments and Compliance Statements compiled by specialists and the written opinions of other suitably qualified professionals will be appended to the Environmental Impact Report and submitted to the competent authority for review.

Please do not hesitate to contact EnviroAfrica for any further information or clarity regarding the above.

Yours faithfully,

Bernard de Witt



Environmental Assessment Practitioner

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DECLARATION OF THE EAP

I, Bernard de Witt, EAPASA Registration Number: 2021/3903 as the appointed EAP hereby declare/affirm that:

- the information provided or to be provided as part of this SSV Report, is true and correct:
- in terms of the general requirement to be independent:
 - other than fair remuneration for work performed/to be performed in terms of this non-application, have no business, financial, personal or other interest in the activity or application and that there are no circumstances that may compromise my objectivity;
- in terms of the remainder of the general requirements for an EAP, am fully aware of and meet all of the requirements and that failure to comply with any the requirements may result in disqualification;

- I have disclosed/ will disclose, to the proponent, the specialist (if any), the Competent Authority and registered interested and affected parties, all material information that have or may have the potential to influence the decision of the Competent Authority or the objectivity of any report, plan or document prepared or to be prepared as part of this NOI;
- I have ensured/will ensure that information containing all relevant facts in the SSV Report was/will be distributed or was/will be made available to registered interested and affected parties and that participation will be facilitated in such a manner that all interested and affected parties were/will be provided with a reasonable opportunity to participate and to provide comments;
- I have ensured/will ensure that the comments of all interested and affected parties were/will be considered, recorded and submitted to the Competent Authority;
- I have ensured/will ensure the inclusion of inputs and recommendations from any specialists, where relevant;
- I have kept/will keep a register of all interested and affected parties that participate in the public participation process;
- I am aware that a false declaration is an offence in terms of Regulation 48 of the EIA Regulations; and
- All specialist investigations must comment on how the potential impacts relate to climate change concerns.

Signature of the EAP:

Date:

EnviroAfrica CC

Name of company (if applicable):
