

## APPENDIX B2

**Comments-Responses Table**

I&AP	Comment received on Draft Scoping Report	Response to from EnviroAfrica
<b>DEA&amp;DP (18/02/2024)</b>	<p>“According to section 9.1.1, page 29 of the DSR, “Most of the tracks providing access to the beach”</p>	<p>Noted</p>
	<p>“The Screening Tool Report generated on 15 January 2024 (Appendix C) identified several specialist assessments to be undertaken during the environmental impact reporting (“EIR”) phase. A Site Sensitivity Verification Report (“SSVR”) dated January 2024 has been provided by the EAP. The Screening Tool Report identified a very high sensitivity for the terrestrial biodiversity and aquatic biodiversity themes, a high sensitivity for the animal species theme, and a medium sensitivity for the plant species theme. According to the SSVR, a Terrestrial Biodiversity Impact Assessment (including an assessment of plants and animals), Aquatic Biodiversity Impact Assessment and Heritage Impact Assessment will be conducted during the EIR phase.</p> <p>4. Although the SSVR indicates that an aquatic biodiversity specialist will be appointed to undertake an Aquatic Biodiversity Assessment, the EAP has disputed the very high sensitivity rating identified by the Screening Tool. It is recommended that the SSVR be amended to confirm the sensitivity rating identified by the Screening Tool, given the prospecting area’s proximity to wetlands associated with the Sout River”.</p>	<p>The proposed development will be kept back at least 600m from the wetlands associated with the Sout River so that the risk to the said wetlands becomes negligible and the Aquatic Biodiversity Assessment will no longer be required.</p>
	<p>“Although the SSVR indicates that a Heritage Impact Assessment (“HIA”) will be undertaken, the very high sensitivity of the palaeontology theme identified by the Screening Tool is disputed. Since a HIA will be undertaken, the SSVR should be amended to confirm the sensitivity rating for the palaeontology theme”.</p>	<p>Done</p>

	<p>“ 6. The Screening Tool identified a low sensitivity for the defence and civil aviation themes. The EAP has disputed these ratings, on the basis that specialist assessments are unwarranted. Please amend the SSVR to confirm the ratings identified in Screening Tool, as the Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation (“the Protocols”) published in Government Gazette<sup>1</sup>, do not require any defence or civil aviation assessment where the rating is of low sensitivity for these environmental themes.</p>	<p>The ratings in the Screening Tool Report are being disputed in that the sensitivity ratings should correctly be negligible.</p>
	<p><i>7. “The Screening Tool identified a medium sensitivity for the agriculture theme. The EAP has disputed the medium sensitivity for this theme, as the proposed prospecting pits 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 that are devoid of vegetation that are used as informal campsites. The EAP is of the view that the agricultural value of the prospecting area will not be affected in any way. This Directorate concurs with the EAP’s opinion in this regard, but potential agricultural impacts associated with the construction and laydown areas must be assessed as part of the Draft EIA Report, if applicable”.</i></p>	<p>Noted</p>
	<p>8. “The SSVR indicates that a Marine Impact Assessment will be undertaken to assess the potential impacts on the marine and coastal environment, should authorities request such an assessment. Given the nature of the proposal and possible direct, indirect and cumulative impacts on the coastline, this Directorate is of the opinion that a Marine Impact Assessment should be undertaken. 1 Government Notice (“GN”) No. 320 of 20 March 2020 in Government Gazette No. 43110, which came into effect on 09 May 2020, and GN No. 1150 of 30 October 2020 in Government Gazette No. 43855, which came into effect on 30 October 2020”.</p>	<p>A specialist has been appointed to conduct a Marine Impact Assessment for the proposed development.</p>
	<p>9. “The cumulative impacts associated with the proposed bulk prospecting will need to be adequately assessed as part of the EIR phase, based on the nature and extent of existing and proposed</p>	<p>This will be thoroughly done in the EIR phase</p>

	<p><i>prospecting and mining activities at the nearby coastline and Matzikama region. Further, considering that most of the proposed prospecting area is located within a Critical Biodiversity Area 1 and Ecological Support Areas, and taken into consideration the potential cumulative impacts associated with prospecting, the precautionary principle must be applied by the competent authority when considering this prospecting application".</i></p>	
	<p>10. "It is noted that only the preferred and no-go alternative will be assessed. However, the DSR does not provide any information on any other alternatives investigated. Therefore, proof must be provided of the investigation undertaken and a motivation indicating that no reasonable or feasible alternatives other than the preferred and the "no-go" alternatives exist".</p>	<p>It has been explained in detail in the Draft Scoping Report, how it came to be concluded that the Preferred Alternative and the 'no-go' alternative are the only feasible alternatives</p>
	<p>12. Section 10 (impacts identified) and section 11 (Plan of Study for EIA) of the DSR refer the reader to various sections and tables in the DSR. Please ensure that the information is provided under each respective heading in the FSR.</p>	<p>Done</p>
	<p>13. The public participation process being followed is in accordance with the requirements specified in regulation 41 of the EIA Regulations, 2014 (as amended). All comments received must be adequately addressed prior to the submission of the FSR to the competent authority. Further, a Comments and Responses Report must be included in the FSR. Directorate: Development Facilitation – Ms Adri La Meyer (Email: Adri.LaMeyer@westerncape.gov.za; Tel.: (021) 483 2887):</p>	<p>Done. However, please note that providing the EAP with comments when the commenting period has lapsed a number of days ago puts undue time-pressure on the EAP and mistakes may easily be made when attempting to address all the comments received and then make a submission to the competent authority within the required timeframe.</p>
	<p>14. The applicability of the waste management activity listed in Category A3(15) of GN No. 921 of 29 November 2013 (as amended) must be confirmed. The Draft EIA Report must indicate the following: 14.1. Classification and characterisation of the residue stockpile. 14.2. Process followed for the investigation and selection of a site for the residue stockpile. 14.3. Location of the residue stockpile. 14.4. Design of the residue stockpile. 14.5. Impact management assessment. 14.6. Monitoring system for the residue stockpile with regards to potentially significant impacts.</p>	<p>Noted</p>

	15. "Please indicate the extent of the two affected properties against the proposed 121ha prospecting Area".	This was done in Figure 4 of the Draft Scoping Report
	16. Please amend Figure 4 to indicate the location of the proposed 20 prospecting pits".	The letter of comment from the DEA&DP was received two days after the commenting period had expired and only a day was left for responding to the comments. Figure 4 could therefore not be amended in time to indicate the location of the prospecting pits. However, when Figure 2 and Figure 4 are considered together, the location of the prospecting pits, farm boundaries as well as the location of the prospecting trenches is clear. The amended Figure 4 indicating the location of the prospecting pits will be included in the Draft EIR.
	17. Please provide the name(s) of the access road/s that will be used to access the coastal environment and indicate the road/s on the site layout plan.	The road to be used is the unnamed public road recently upgraded by Tronox that leads to the Tronox facilities near the proposed site. An existing track connecting to the said road will be used to reach the proposed site. The public road and the track are yet to be named.
	18. "What is the estimated duration that a prospecting trench will remain open to remove bulk samples <i>before the trench is rehabilitated</i>	A prospecting trench will remain open for a maximum of two days
	19. "The Plan of Study for EIA indicates that only Terrestrial Biodiversity, Aquatic Biodiversity and Heritage Impact Assessments will be undertaken. Per the SSVR, this Directorate supports the undertaking of a Marine Impact Assessment by a suitably qualified and experienced marine ecologist. Please amend the Plan of Study for EIA accordingly".	A specialist has been appointed to compile a Marine Impact Assessment and the report will be appended to the Draft EIR
	20. The terms of reference for specialist appointment must include, where applicable, compliance with the relevant Protocols.	Noted
	21. Please include the Branch: Oceans and Coast (email: OCEIA@dffe.gov.za) of the Department of Forestry, Fisheries and the Environment ("DFFE") in the list of authorities that will be consulted. Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email: Gunther.Frantz@westerncape.gov.za; Tel.: (021) 483 2975):	Done
	22. This Directorate has no comments on the DSR and awaits the Draft EIA Report and associated Environmental Management Programme ("EMPr") to provide comment on potential pollution related aspects and mitigation. Directorate: Waste Management – Ms Helena van Aarde (Email:	Noted

	<p>Helena.VanAarde@westerncape.gov.za; Tel.: (021) 483 3003): 23. This Directorate is satisfied with the Plan of Study for EIA.</p>	
	<p>24. "It is noted that one of the potential risks identified, is the loss of indigenous vegetation due to the creation of a laydown area. Please provide an estimate of the size of the area that will be cleared. Any removed vegetation should be sent to a garden waste chipping facility for composting and should be managed in accordance with the Municipality's Organic Waste Diversion Plan. It is not permitted to dispose of vegetation within the prospecting area. Directorate: Biodiversity and Coastal Management – Mr Ryan Apolles (Email: Ryan.Apolles@westerncape.gov.za; Tel.: (021) 483 2817)":</p>	<p>The proposed development will be confined to the area between the low-water and high-water mark of the sea and to on-site patches that are devoid of vegetation landward of the high-water mark of the sea.</p>
	<p>25. "It is noted that the proposed bulk sampling activities are proposed to take place between the lowwater and high-water mark, which has an impact significance in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("NEM: ICMA"). From a NEM: ICMA perspective, the proposed bulk sampling activities would be taking place in coastal public property ("CPP") and access by the heavy machinery to the CPP would be taking place within the coastal protection zone ("CPZ").</p> <p>26. Is therefore noted that Table 5 of the DSR does not include the NEM: ICMA as a primary legislation to consider, but only lists NEM: ICMA under "other legislation", even though the NEM: ICMA has significant application for this proposal. Please update Table 5 to include the applicability of the NEM: ICMA to the application".</p>	<p>Table 5 has been amended to include the NEM:ICMA</p>
	<p>27. "Please also amend Table 5 to refer to the Revised National List of Ecosystems that are Threatened and in Need of Protection ("the Red List of Ecosystems") in GN No. 2747 of 18 November 2022".</p>	<p>Done</p>
	<p>28. "Please refer to section 7 of the NEM: ICMA for a description of the composition of CPP, which includes inter alia, coastal water, land submerged by coastal water, the seashore, etc. The CPP is raised as a significant spatial coastal element to consider, given the stated purpose of the</p>	<p>Done</p>

CPP described in section 7A of NEM: ICMA, which includes, amongst others, to improve public access to the seashore, to protect sensitive coastal ecosystems, and to secure the natural functioning of dynamic coastal processes.

29. Please refer to section 16 of NEM: ICMA for a description of the composition of the CPZ, which includes, inter alia, any part of the littoral active zone that is not CPP, any land unit that is situated wholly or partially within one kilometre of the high-water mark, and any coastal wetland, lake or lagoon.

30. The CPZ is a significant coastal spatial element to consider, given the stated purpose of the CPZ described in section 17 of NEM: ICMA. The CPZ is established for enabling the use of land that is adjacent to CPP or that plays a significant role in a coastal ecosystem to be managed, regulated or restricted to:

30.1. Protect the ecological integrity, natural character, and economic, social and aesthetic value of the CPP.

30.2. Maintain the natural functioning of the littoral active zone.

30.3. Maintain the productive capacity of the coastal zone by protecting the ecological integrity of the coastal environment.

31. In addition to the above, section 63(1) of the NEM: ICMA which relates to environmental authorisation for coastal activities, states the following:

"Where an environmental authorisation in terms of Chapter 5 of the National Environmental

Management Act is required for coastal activities, the competent authority must take into account all relevant factors, including -

...

(c) whether coastal public property, the coastal protection zone or coastal access will be affected,

and if so, the extent to which the proposed development or activity is consistent with the purpose of establishing and protecting those areas;

...

(h) whether the development or activity -

(i) is situated within coastal public property and is inconsistent with the objective of conserving and

	<p><i>enhancing coastal public property for the benefit of current and future generations;</i>  <i>(ii) is situated within the coastal protection zone and is inconsistent with the purpose for which a coastal protection zone is established as set out in section 17;</i>  <i>(iii) ...</i>  <i>(iv) is likely to cause irreversible or long-lasting adverse effects to any aspect of the coastal environment that cannot satisfactorily be mitigated.”</i></p>	
	<p>32. <i>“This Directorate notes that the Plan of Study for EIA proposes that a Terrestrial Biodiversity Impact Assessment (including animal and plant species), Aquatic Biodiversity Impact Assessment (including hydrology), and a Heritage Impact Assessment will be undertaken. This Directorate recommends the appointment of a specialist that has experience in assessing/evaluating impacts of similar or the same activities within the coastal zone, i.e., CPP and CPZ, to adequately address the requirements of section 63 of the NEM: ICMA”.</i></p>	<p>A suitably qualified and experienced specialist has been appointed to compile a specialist report that meets this request. The specialist report will be appended to the Draft EIR.</p>
	<p>33. <i>“Table 20 of the DSR which outlines the potential risks and impacts, should be updated to include the following additional potential impacts:</i>  33.1. <i>Impact on the threat status of the shore where the activity is proposed. The DSR indicates that the surf zone included in this application forms part of the Southern Benguela Ecoregion, and states that the coastline of the study area were categorised into ecosystem types by Sink et al (2019) and assigned a threat status depending on their geographic extent and extent of ecosystem degradation. The DSR further indicates that some of the proposed prospecting area has been categorised as mixed shore with a threat status of “vulnerable” and that due to the exposed nature of the coastline in the study area, most beaches are categorised as intermediate sandy shore with a threat status of “near threatened”, reflecting the condition of the ecosystem types following decades of shore- and vessel-based diamond mining. No provision is not made for a coastal or marine specialist to consider the</i></p>	<p>Done. A Marine Ecological Impact Assessment will be conducted by a specialist.</p>

	<i>implications of the activities within the CPP”.</i>	
	<p>33.2. “<i>This Directorate is concerned that the impacts of twenty exploration pits and four trenches which may reach depths of up to 6,5m and 15m respectively, may result in negative impacts on the frontal dune systems and natural beach profile by creating circumstances that allow the systems to be undermined, causing possible dune collapse and permanently changing the natural topography of the area. This aspect is not considered to be assessed during the project assessment”.</i></p>	<p>The proposed prospecting with bulk sampling will be strictly limited to the area between the low-water mark and the high-water mark of the sea. The associated on-site activities will be located on patches that are devoid of vegetation and that do not encroach onto the frontal dune systems.</p>
	<p>34. “<i>Section 3.1.3 of the DSR which describes the bulk sampling activities, notes that: “The bulk sampling or trial mining however needs to continue till approximately 1 000 carats has been recovered for the feasibility of the mine to be concluded and the determination to continue with a Mining Right application.” Said statement seems to provide a caveat that is open ended, which could create an undetermined amount of further activity until such requirement for 1 000 carats recovered is reached.</i></p> <p>35. <i>This Directorate proposes that consultation should be expanded to include authorities such as the DFFE: Oceans and Coast and CapeNature”.</i></p>	Noted
	<p>36. “<i>While it is acknowledged that it is not the responsibility of the applicant to undertake a Strategic Environmental Assessment (“SEA”), the competent authority must take cognisance of this recommendation to undertake a SEA that will allow EAPs and specialists to accurately assess cumulative impacts based on spatial planning principles, to assess and manage potential cumulative impacts in a holistic manner, and to identify and implement regional level mitigation measures.</i></p> <p><i>Department of Environmental Affairs and Development Planning Directorate: Air Quality Management – Ms Nokulunga Goqo (Email: Nokulunga.Goqo@westerncape.gov.za; Tel.: (021) 483 6510)”:</i></p>	Noted
	<p>37. “<i>Dust generated during all phases of the proposed activity must comply with the National Dust Control Regulations (GN No. R. 827 of 1 November 2013)</i></p>	Noted



	<p><i>promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.</i></p> <p><i>38. Noise generated from the proposed invasive prospecting activities may not result in noise levels above the acceptable limit. The Western Cape Noise Regulations (Provincial Notice 200/2013) must always be strictly complied with.</i></p> <p><i>39. Measures to monitor and prevent disturbing noise and dust emissions must be investigated during the EIR phase and included in the EMPr”.</i></p>	
<p><b>Kliprand Landbouwer eniging (30/01/2024)</b></p>	<p><i>“1) Die mense van hierdie streek is oorwegend Afrikaanssprekend, en alle kommunikasie (dws e-posse, briewe, kennisgewings, verslae ens.) moet beslis in beide Afrikaans en Engels uitgegee word, om te verseker dat die stappe en besonderhede van die aansoek- en openbare deelnameproses korrek verstaan word, asook die gedetailleerde inhoud van dokumente soos die Basiese Assesseringsverslae en spesialisverslae, ens., ook ten volle verstaan word.</i></p> <p><i>Vir u verwysing: op die Matzikama Munisipaliteit se webwerf <a href="https://en.wikipedia.org/wiki/Matzikama_Local_Municipality">https://en.wikipedia.org/wiki/Matzikama_Local_Municipality</a> word aangedui dat -</i></p> <p><i>“According to the 2011 census the municipality has a population of 67,147 people in 18,835 households. Of this population, 74.7% describe themselves as "Coloured", 14.8% as "White", and 8.5% as "Black African". The first language of 91.8% of the population is Afrikaans, while 3.5% speak Xhosa and 1.8% speak English.<sup>[31]</sup> (uitgeligte teks hierbo in rooi is my eie klem)</i></p> <p><i>Volgens die “PUBLIC PARTICIPATION GUIDELINE IN TERMS OF NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS” uitgereik deur die Suid-Afrikaanse Departement van Omgewingsake</i></p>	<p>Please note that Regulation 41 of the EIA Regulations of 2014 (as amended) does not require the Applicant nor appointed EAP to notify everybody of the application for environmental authorisation in the relevant area.</p> <p>The EIA Regulations require that written notification of the development proposal be given to Local and District Municipalities, relevant Councillor of the Ward where the proposed site is located, landowners and occupiers of land immediately neighbouring the proposed site, the landowner if the Applicant is not the landowner, relevant Organs of State and State Departments that administer a law relevant to the development proposal and that a newspaper advertisement be published in a local newspaper for a development proposal that is of local importance. However, it will be considered as the application proceeds, whether to extend the public participation beyond the said legal requirements in the upcoming Environmental Impact Reporting phase of the application.</p>

[https://www.environment.gov.za/sites/default/files/docs/publicparticipationguideline\\_internofnemaEIAregulations.pdf](https://www.environment.gov.za/sites/default/files/docs/publicparticipationguideline_internofnemaEIAregulations.pdf)

en ook beskryf deur die

Departement van Omgewingsake en Ontwikkelingsbeplanning – Provinsiale Regering van die Wes-Kaap dokument getiteld “EIA GUIDELINE AND INFORMATION DOCUMENT SERIES GUIDELINE ON PUBLIC PARTICIPATION” en gedateer Oktober 2011

Section 5.9 headed Facilitation, Broadening Participation, Capacity Building & Special Needs (die onderstaande gedeelte in rooi uitgelig is my eie klem, aangesien daar gevoel word dat dit relevant is en vir hierdie streek se landbou- en plaaslike-gemeenskap in ag geneem moet word)

*“The person responsible for conducting the public participation process must ensure that participation by potential interested and affected parties is facilitated in such a manner that all potential interested and affected parties are provided with a reasonable opportunity to comment on the application. Appropriate participation measures should be put in place to deal with the range of cultural and language requirements of I&APs. The language used by the I&APs must be taken into account when serving a notice, selecting a newspaper, holding a public meeting and writing a report.”*

*Ons is bewus daarvan dat die dokumentasie vir aansoeke soos hierdie by die besluitnemingsowerhede in Engels ingedien word, maar die plig van die OAP om te verseker dat gemeenskappe van al die inligting in die voorkeurtaal van die gebied voorsien word, asook die geleentheid om hul kommentaar in hul voorkeurtaal van kommunikasie tydens die openbare deelnameproses in te dien, is onmiskenbaar en spesifiek deur die regulasies vereis”.*

*“2) Neem asseblief kennis dat baie mense in hierdie gedeelte van die Matzikama Munispale-streek min, swak of geen internet- en/of selfoonsein op die plase of in die kleiner dorpe het nie. Sommige van ons het Wi-Fi-toerusting by die opstalle laat installeer, maar baie ander is geleë in gebiede waar die nodige siglyn vir sulke seine dikwels nie moontlik is nie as gevolg van die*

<p><i>terrein. Buite in die veld is selfoonseine ook dikwels baie swak of glad nie beskikbaar nie.</i></p> <p><i>Daar is mense in hierdie streek wat slegs e-posse (of dokumente wat per e-pos gestuur word) op hul selfone kan ontvang en lees wanneer hulle in 'n gebied is waar daar sein is – ontvangs van korrespondensie is dus sporadies.</i></p> <p><i>Baie mense het nie rekenaars of skootrekenaars nie.</i></p> <p><i>Baie mense het ook nie drukkers of skandeerders beskikbaar as hulle dokumente wil druk of skandeer nie.</i></p> <p><i>Weens die gebrek aan infrastruktuur en tegnologie in die omgewing is baie ook nie toegerus of vertrou met die gebruik van virtuele platforms soos Zoom vir vergaderings nie. Daarbenewens is ons Wi-Fi-seine gewoonlik nie voldoende vir WhatsApp-video-oproepe op ons selfone nie, so 'n gesamentlike Zoom-tipe vergadering met hierdie toestel is ook buite die kwessie vir die groter persentasie van diegene wat op die plase woon.</i></p> <p><i>Let ook daarop dat, as gevolg van die lang afstande tussen plase, die klein dorpie en die groter dorpe, die gepaardgaande koste van vervoer/reis, dat lede van ons plaaslike landelike gemeenskappe nie gereeld na die groter dorpe toe gaan waar internettoegang en selfoonseine meer beskikbaar en betroubaar is nie – die meeste van ons doen een keer elke twee tot drie weke inkopietogte na die groter dorpe Vanrhynsdorp en Vredendal, by voorbeeld. Dit beteken dat onmiddellike ontvangs van, en antwoorde op, enige korrespondensie / dokumente / inligting / kennisgewings, ens., beslis nie gewaarborg word vir 'n aantal van ons plaaslike inwoners as hulle tuis elektroniese kommunikasie beperkings het nie. Laasgenoemde is veral relevant ten opsigte van toegang tot koerante, en ten einde kennisgewings, dokumente ens. in harde-kopie format te lees, want sulke geleenthede is ongereeld.</i></p> <p><i>As gevolg van die verskillende kommunikasie beperkings hierbo genoem, is hierdie gemeenskappe gewoon daaraan om bymekaar te kom vir vergaderings om sake van gemeenskaps- en/of streeksbelang te</i></p>	<p>Noted. All future public participation notices concerning the application will be written in both English and Afrikaans.</p>
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*bespreek – dit omvat enigiets van Kerk- tot landbousake, en alles tussenin. Dit is die tradisionele manier van dinge doen hier – hierdie plaaslike gemeenskappe is klein, maar heg aan mekaar, met 'n sterk gevoel van eenheid van gemeenskap wat heers.*

*Openbare vergaderings op verskillende plekke sal dus beplan moet word om voorsiening te maak vir die vervoer-, afstand- en kommunikasie beperkings wat baie van die inwoners in hierdie omgewing ervaar. Sulke vergaderings sal B&GPe en hierdie plaaslike gemeenskappe in 'n groepforum omvattende inligting kan verskaf, vrae kan gevra word en mense kry ook so die kans om ander se kommentaar en opinies te hoor – dit alles kan net daartoe lei dat gemeenskapslede gemotiveer en beter toegerus word om sinvol aan die proses deel te neem, veral vir diegene wat sukkel om elektroniese kommunikasiemiddele te gebruik. Let asseblief daarop dat dit ook gepas sal wees om nie net openbare vergaderings rakende die aanvanklike kommentaar tydperke te hou nie, maar ook om die gemeenskappe op hoogte te hou van die vordering van die aansoek vorentoe, asook enige verdere geleenthede vir openbare deelname wat in die toekoms mag ontstaan.*

*Volgens die Departement van Omgewingsake en Ontwikkelingsbeplanning – Provinsiale Regering van die Wes-Kaap dokument getiteld "EIA GUIDELINE AND INFORMATION DOCUMENT SERIES GUIDELINE ON PUBLIC PARTICIPATION" en gedateer Oktober 2011, was Afdeling 5.9 onder die hoof 'Facilitation, Broadening Participation, Capacity Building & Special Needs' (weereens, uitgeligte gedeeltes hieronder in rooi is my eie klem, synde van relevansie en vereis dus oorweging vir hierdie streek se plaaslike gemeenskappe en belanghebbendes)*  
*"Where I&APs include historically disadvantaged communities or people with special needs (e.g. a lack of skills to read or write, disability, or any other disadvantage), the following must, inter alia, be considered: the project and public participation process could be announced on an appropriate local radio station in a local language, at an appropriate time;*

	<ul style="list-style-type: none"> <li>· <i>Participatory Rural Appraisal ("PRA") and Participatory Learning and Action ("PLA") approaches and techniques could be used to build the capacity of these stakeholders to engage and participate more effectively (see references below);</i></li> <li>· <i>existing community structures, committees and leaders must specifically be approached;</i></li> <li>· <i>public meetings could be held at times and venues suitable to the community;</i></li> <li>· <i>determine the need for separate meetings with vulnerable and marginalised groups;</i></li> <li>· <i>appropriate access to information must be provided; and</i></li> <li>· <i>reasonable assistance to people with special needs must be provided.</i></li> </ul> <p><i>Ek is van mening dat as openbare vergaderings nie gehou word nie, dit gelykstaande is aan hierdie streek se mense nie die geleentheid te bied om voldoende ingelig te wees nie. In vorige, soortgelyke prosesse is geen belangstelling in Openbare Opedae getoon nie, aangesien mense verkies om gemeenskaps-sake as 'n groep te bespreek".</i></p>	
	<p><i>"3) Wanneer kennisgewings of dokumente uitgereik word vir openbare inligting en/of kommentaar, sal dit raadsaam wees om dit elektronies te doen sowel as deur bykomende kopieë in hardekopieformaat uit te reik vir verspreiding, sodat diegene wat weens die gebrek aan selfoon/internetverbinding nie groot lêers kan aflaai nie, steeds betyds toegang tot die nodige inligting kan hê. Dit is van besondere belang vir gemeenskapslede wat op afgeleë plase woon en wat slegs sporadiese besoeke aan nabygeleë dorpe of die groter dorpe in die omgewing aflê, en dus beperkte tyd en/of geleentheid het om dokumente wat by openbare plekke soos biblioteke beskikbaar is, te lees.</i></p> <p><i>Neem asseblief kennis dat die gebruik van die posdiens in hierdie gebied nutteloos is - dit neem eenvoudig te lank om aan te kom - en dat alles wat aan B&amp;GPe gestuur moet word, eerder gekoerier of afgelewer moet word by 'n ooreengekome sentrale punt, sodat die B&amp;GPe dan daarvandaan dit kan gaan haal".</i></p>	<p>It will be considered in the upcoming public participation process for the Environmental Impact Reporting phase of the application, where to make printed reports for the application available to the public in the area of the proposed site.</p>
	<p><i>"4) 'n Bykomende faktor waarvan u bewus moet wees, is dat baie boere, grondeienaars en inwoners van hierdie streek uiters versigtig is vir prospekter-</i></p>	<p><b>Noted</b></p>

	<p><i>en mynbouaansoeke is as gevolg van historiese ervarings in die streek (sommige spruit uit so ver terug as die 1960's) waar mynmaatskappye mondelinge (en dus onverifieerbare) beloftes gemaak het, grondeienaars mislei het, landbou- en kuseiendomme onherstelbaar versteur het en grondeienaars in situasies gelaat was waar rehabilitasie en restitusie daarna onmoontlik was. Alhoewel baie verander het rakende die amptelike wyse waarop sulke sake deesdae hanteer word, met baie meer wigte en teenwigte wat in plek is, is dit steeds 'n kwessie wat vir 'n groot deel van hierdie gemeenskappe uiters wantroue veroorsaak".</i></p>	
	<p><i>"5) U moet ook daarvan bewus wees dat hierdie gemeenskappe in die onlangse verlede aan verskillende prospekteringsaansoeke onderwerp was (beide kustrangs asook in die binneland), en tans nog steeds is, almal in verskillende stadiums van die amptelike tydlyne vir sulke prosesse. Hierdie ervarings, van baie gefragmenteerde, ingewikkelde en komplekse prosesse, het daartoe gelei dat plaaslike inwoners, B&amp;GPe en leke soos ons uiters oorweldig, verward en selfs meer versigtig vir sulke sake geword het"</i></p>	<p><b>Noted</b></p>
<p><b>Katryn Visser (30/01/2024)</b></p>	<p><i>"1) The DMRE reference number WC50/1/1/2/10454PR quoted in the subject line of your email notification, and which also appears in the Draft Scoping Report for this project, does not match the DMRE reference number used in the Screening Tool Report (WC30/1/1/2/10454PR). This type of discrepancy can result in confusion for I&amp;APs, especially those who do not have easy means or regular exposure to participation in application processes such as this one".</i></p> <p><i>"2) The people of this region are predominantly Afrikaans-speaking, and all communication (emails, letters, notices, reports etc.) should most certainly be done in both Afrikaans and English to ensure that the steps and details of the application- and public participation process are correctly understood, as well as the detailed content of such documents as the Scoping Reports, Basic Assessment Reports and specialist reports etc., are also fully understood.</i></p>	<p>Noted. Please note that the correct DMR reference for the prospecting with bulk sampling application is (WC 50/1/1/2/10454/ PR)</p> <p>The public participation notices for this application will in the future all be provided in both English and Afrikaans.</p>

For your reference, on the Matzikama Municipality website: [https://en.wikipedia.org/wiki/Matzikama Local Municipality](https://en.wikipedia.org/wiki/Matzikama_Local_Municipality) it is indicated that -

*“According to the 2011 census the municipality has a population of 67,147 people in 18,835 households. Of this population, 74.7% describe themselves as “Coloured”, 14.8% as “White”, and 8.5% as “Black African”. The first language of 91.8% of the population is Afrikaans, while 3.5% speak Xhosa and 1.8% speak English.[3]” (note: highlighted text in red is my own emphasis)*

**Per the PUBLIC PARTICIPATION GUIDELINE IN TERMS OF NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS Issued by the South African Department of Environmental Affairs [https://www.environment.gov.za/sites/default/files/docs/publicparticipationguideline\\_in\\_terms\\_of\\_nema\\_eia\\_regulations.pdf](https://www.environment.gov.za/sites/default/files/docs/publicparticipationguideline_in_terms_of_nema_eia_regulations.pdf) and also described by the Department of Environmental Affairs and Development Planning – Provincial Government of the Western Cape document titled “EIA GUIDELINE AND INFORMATION DOCUMENT SERIES GUIDELINE ON PUBLIC PARTICIPATION” and dated October 2011**

*Section 5.9 headed Facilitation, Broadening Participation, Capacity Building & Special Needs (note: the section below highlighted in red is my own emphasis, as it is felt that this is relevant and must be taken into consideration for this region’s varied communities)*

*“The person responsible for conducting the public participation process must ensure that participation by potential interested and affected parties is facilitated in such a manner that all potential interested and affected parties are provided with a reasonable opportunity to comment on the application. Appropriate participation measures should be put in place to deal with the range of cultural and language requirements of I&APs. The language used by the I&APs must be taken into account when serving a notice, selecting a newspaper, holding a public meeting*

	<p><i>and writing a report.”</i></p> <p><i>I am comfortable to correspond in English, however I am in the distinct minority in this regard in this region.....en die taal wat ons by die huis praat is baie beslis Afrikaans.</i></p> <p><i>Whilst it is understood that the documentation for applications like this one are lodged with the decision-making authorities in English, the duty of the EAP to ensure that communities are provided with all the information in the preferred language of the area, as well as the opportunity to submit their comments in their preferred language of communication during the public participation process, is undeniable and specifically required by the regulations”.</i></p>	
	<p><i>“3) Please be aware that many people in this part of the Matzikama Municipal area have little, weak or no internet- and/or cellphone signal on the farms or in the outlying villages. Some of us are able to have Wi-Fi equipment installed at the homesteads, but many are located in areas where the necessary line-of-sight for such signals is not possible due to the terrain. When out on the farms cellphone signal is often non-existent, or spotty and weak, at best.</i></p> <p><i>There are people in this region who can only receive and read emails (or documents sent by email) on their cellphones once they are in an area where there is signal – receipt of correspondence is thus irregular. Many people do not have desktop PC’s or laptops. Many people also do not have printers or scanners available if they want to print or scan documents.</i></p> <p><i>Due to the lack of infrastructure and technology in the area, many are also not equipped or familiar with using virtual platforms like Zoom for meetings. In addition, our Wi-Fi signals are usually not sufficient for WhatsApp video calls on our cellphones, so a collective, remote meeting using this device is also out of the question for the greater percentage of those living out on the farms and in the villages.</i></p> <p><i>Due to the various communication constraints mentioned above, these communities are used to coming together for meetings to discuss matters of community- and/or regional concern – this</i></p>	<p>Please note that Regulation 41 of the EIA Regulations of 2014 (as amended) does not require the Applicant nor appointed EAP to notify everybody of the application for environmental authorisation in the relevant area.</p> <p>The EIA Regulations require that written notification of the development proposal be given to Local and District Municipalities, relevant Councillor of the Ward where the proposed site is located, landowners and occupiers of land immediately neighbouring the proposed site, the landowner if the Applicant is not the landowner, relevant Organs of State and State Departments that administer a law relevant to the development proposal and that a newspaper advertisement be published in a local newspaper for a development proposal that is of local importance. However, it will be considered as the application proceeds, whether to extend the public participation beyond the said legal requirements in the upcoming Environmental Impact Reporting phase of the application.</p>



*encompasses anything from Church- to agricultural matters, and everything else in between. It is the traditional way of doing things here - these communities are small but closely knit, with a strong sense of unity of community prevailing.*

*Per the Department of Environmental Affairs and Development Planning – Provincial Government of the Western Cape document titled “EIA GUIDELINE AND INFORMATION DOCUMENT SERIES GUIDELINE ON PUBLIC PARTICIPATION” and dated October 2011, Section 5.9 headed Facilitation, Broadening Participation, Capacity Building & Special Needs (again, highlighted sections below in red are my own emphasis, being of relevance and requiring consideration for this region's communities)*

*“Where I&APs include historically disadvantaged communities or people with special needs (e.g. a lack of skills to read or write, disability, or any other disadvantage), the following must, inter alia, be considered:*

- the project and public participation process could be announced on an appropriate local radio station in a local language, at an appropriate time;*
- Participatory Rural Appraisal (“PRA”) and Participatory Learning and Action (“PLA”) approaches and techniques could be used to build the capacity of these stakeholders to engage and participate more effectively (see references below);*
- existing community structures, committees and leaders must specifically be approached;*
- public meetings could be held at times and venues suitable to the community;*
- determine the need for separate meetings with vulnerable and marginalised groups;*
- appropriate access to information must be provided; and*
- reasonable assistance to people with special needs must be provided.*

*Please also note that, due to the long distances between farms, the villages and the larger towns, the associated costs of transport/travelling, members of our local rural communities do not regularly go to the larger towns where internet access and cellphone signals are more available and reliable – most of us do shopping trips to the larger towns of Vanrhynsdorp and Vredendal once every two to three*

	<p><i>weeks, or so. This means that immediate receipt of, and responses to, any correspondence / documents / information / notices etc. is most certainly not guaranteed for a number of our local residents, if they have electronic communication constraints where they live. The latter is relevant in particular with regard to access to newspapers in order to read notices, or access to hard-copy documents etc., such opportunities being sporadic in nature.</i></p> <p><i>Public meetings in various locations should be planned, in order to cater for the transport and communication constraints experienced by many of the residents in the area, in order to inform I&amp;APs and the surrounding communities in group forums, so that comprehensive information can be gleaned, questions asked, and people can have a chance to hear others' comments and opinions – all of this can only result in community members being motivated and better equipped to participate meaningfully in the process, particularly for those who struggle to use electronic communication means. Please note that it would also be appropriate to not only have public meetings regarding the initial comment periods, but also to engage with communities in this way, to keep everybody informed about the progress of the application thereafter, and any further public participation opportunities that might arise.</i></p> <p><i>Given the traditional way of doing things here - group meetings where comments, opinions and concerns can be raised - and answered upon - collectively, as well as the local circumstances already mentioned, it is my opinion that to not hold public meetings would be tantamount to not providing this region's people with the opportunity to be sufficiently informed. In previous, similar processes no interest was shown in Public Open Days, as people prefer to address their community matters as a group".</i></p>	
	<p><i>"4) When notices or documents are issued for public information and/or comment, it would be advisable to do this both electronically as well as by issuing additional copies in hard copy format for distribution to various locations, so that those who cannot download large files due to the lack of cellphone/internet</i></p>	<p>Noted</p>

	<p><i>connectivity, can still have access to the necessary information timeously. This is of particular importance to communities who live on outlying farms and villages, and who only make sporadic visits to the bigger towns in the area, and thus have limited time and/or opportunity to peruse documents left at public places such as libraries.</i></p> <p><i>Please be advised that using the postal service in this area is pointless – it simply takes far too long to arrive - and that anything that needs to be sent to I&amp;APs should be couriered or delivered by hand or issued at agreed-upon central points so that the I&amp;APs or representatives of communities/organisations can then collect whatever needs to be distributed from there”.</i></p>	
	<p><i>“5) An additional factor that you need to be aware of is that many farmers, landowners, and residents of these communities, are extremely wary of prospecting and mining applications due to historical experiences in the region (some stemming from as far back as the 1960’s) where mining companies made verbal (and thus unverifiable) promises, misled land owners, disturbed agricultural- and coastal land irreparably and left landowners in situations where rehabilitation and restitution was nigh on impossible afterwards. Whilst much has clearly changed regarding the official manner in which such matters are handled nowadays, with a lot more checks and balances being in place, this is still an issue that rankles and causes extreme distrust for a large portion of this community”.</i></p>	<p>Noted</p>
	<p><i>“6) You also need to be aware that these communities have in the recent past been, and are currently still being, subjected to various prospecting applications both inland and along the coast, all at varying stages on the official timelines for such processes. These experiences, of very fragmented, convoluted and complex processes, has resulted in local residents, I&amp;APs and lay-people such as myself becoming extremely overwhelmed, confused and even more wary of such matters. Clear and varied communication channels are therefore vital in order to keep everyone thoroughly informed about the prospecting application process, the details of the</i></p>	<p>Noted</p>

	<i>proposed project and the impacts of the proposed project on the target properties and surrounding environment”.</i>	
	<p><i>“7) On the title page of the Prospecting Work Programme document it is stated: "Resubmit WC30/5/1/1/2/10434PR under new reference", and on page 3 the Consultants details are listed as those of N J Van Zyl, based in Springbok. Whilst it seems that Fish by the Sea (Pty) Ltd has appointed a new EAP to manage this new application, and that it is probable that the information set out in PWP document may be the same as for the previous application, by not providing the current application reference number or the details of the current EAP / Consultant for this new application in this document makes it inconsistent with the rest of the project information provided. As such, this can only result in confusion for I&amp;APs, especially those who do not have easy means or regular exposure to participation in application processes such as this one”.</i></p>	<p>Noted. The relevant reference number for this diamond prospecting with bulk sampling application is (WC 50/1/1/2/10454/ PR). The reference number that you have mentioned and the EAP, NJ van Zyl that you mentioned, relate to the terminated application WC30/5/1/1/2/10434PR for diamond prospecting without any bulk sampling.</p>
<b>M. Rossouw (18/02/2024)</b>	<p><i>“Geagte Mnr Nthejane Baie dankie vir die ekstra twee dae wat u my gegun het vir indiening. Ek kon ongelukkig nie u kantore besoek, soos voorgestel, om my te help met al die Engelse terme nie. Ek verstaan Afrikaans, Engels en isiXhosa word erken as die Weskaap se amptelike tale. In hierdie deel van die Weskaap word feitlik net Afrikaans gepraat en ons sal dit waardeer indien toekomstige dokumente ook in Afrikaans beskikbaar gestel word. Ons sal ook 'n Afrikaansprekende tolk waardeer by toekomstige publieke vergaderings, indien enige”.</i></p>	<p>Dear M. Rossouw, it is only a pleasure. EnviroAfrica will make future public participation notices for the proposed prospecting with bulk sampling application available in English as well as in Afrikaans.</p>
	<p><i>“My kommentaar en besware rakende bogenoemde aansoek:  <b>1. Fisiese stukkie kuslyn geormerk vir hierdie aansoek</b>  Ek het die stukkie kuslyn wat deur hierdie aansoek geraak word, fisies deurgery. Ek het teen die Soutrivier begin en suid gery tot waar die voorgestelde gebied eindig. Ek het u GPS koördinate gehad wat my in staat kon stel om die strande positief te identifiseer. Die konsep BAV beskryf hoe die aansoeker te werk sal gaan in die soeke na diamante, die mates van die prospekterslote, die keerwalle wat</i></p>	<p>Tronnox has upgraded the road to their sea water intake and are using it on a regular basis even with heavy vehicles. This is the same road to be used by the applicant and for the short distance from this public road to the beach the excavator will use the existing tracks without any upgrading required.</p>

gestoot gaan word om die see tydens hoogwater uit te hou, die pompe, die groot masjinerie.

Die konsep BAV gee weer dat die aansoeker bestaande paaie gaan gebruik om die strande te bereik asook areas, alreeds negatief geaKekteer deur kampeerdere, sal gebruik word vir storting van skeepsvragehouers, grondverskuiwingsmasjinerie, mobiele ablusie geriewe, diesel voorraad asook 'n aanleg om moontlike diamantdraende grond te sif, om 'n paar te noem. Iewers mis ek iets. Ek verstaan nie hoe die aansoeker hierdie stukkie meestal ongerepte kuslyn wil afmaak as 'n kuslyn wat alreeds genoegsame plek bied vir die projek se parkeerareas nie, en daardeur beweer die aansoeker se voetspoor gaan niksseggend klein wees. Hierdie stukkie kuslyn is nie so toeganklik soos wat die EAP en aansoeker beweer nie.

Ek het slegs ses (6) ingangspaaie vanaf die enkele gelyste pad af see toe gekry. Hierdie gelyste pad loop parralel met die kuslyn en is meestal geskik vir slegs een voertuig. Daar is baie min plekke waar twee voertuie bymekaar kan verbykom. Die gelyste pad is in 'n slegte toestand, vol sinkplaat, poeiergate en slaggate. Die pad word baie deur die publiek gebruik, en is nie naastenby geskik om enige grondverskuiwingsmasjinerie te dra nie. Die pad word nie onderhou nie.

Foto 1

Die eenspoor, gelyste pad wat die aansoeker moet gebruik. Jy moet iewers van hierdie pad afdraai om by die stande uit te kom. Hierdie pad sal nie swaar grondverskuiwings masjinerie, plus die alledaagse verkeer, kan dra nie. Ek het slegs twee uittrek plekke gesien en voorsien dat die omgewing redelik beskadig sal word sou 'n masjien vir 'n voertuig moet uitswenk. Dit is 'n klein stukkie kuslyn, meestal ongerep, neKens die massiewe Tronox myn bedrywighele aan die oorkant van die pad. Op my besoek het ek steenbok gesien, suidelike bleeksing valkies, rooi valkies, meeue, swart tobies, volstruise en een verkleurmannetjie.

Die kuslyn word hier en daar ontsier deur 'n paar twee spoor paadjies na die kus, moontlik neergelê deur die publiek op soek na kreef, asook een groot ongerehabiliteerde historiese prospektersloot met sigbare erosie

<p><i>“(Foto 2). Daar kan moontlik nog wees, maar ek kon nie oral ry nie agv die swaar sand.</i></p> <p><i>Foto 2 Foto 3</i></p> <p><i>Ou prospekter sloot skade, hierdie sloot kan moontlik gebruik word om op die strand te kom</i></p> <p><i>Ek kon slegs een van die ses paaie gebruik om feitlik tot by die strand te ry, in vieriel trek en laer strek.</i></p> <p><i>Vier van die paaie loop dood in omdraaiplekke voor die strand bereik word.</i></p> <p><i>Een pad het 'n baie skerp helling af na die strand toe. Die sand is ontsettend swaar. Rotse keer af en toe dat van die strande as 'n eenheid benader kan word.</i></p> <p><i>Ek heg foto's aan van die paaie.</i></p> <p><i>Foto 4 Foto 5 Foto 6</i></p> <p><i>Foto 7 Foto 8</i></p> <p><i>Vyf van die 6 afdraaipaaie kus toe. Al vyf (5) van hierdie paaie loop dood in omdraai plekke. Om by die kus te kom, sal die aansoeker deur natuurlike omgewing moet verder ry.</i></p> <p><i>Pers pyle dui die rigting van die strand aan, geel pyl wys hoe al die omdraai plekke lyk en die rooi pyl op fot 8 wys swaar sand en duin waardeur aansoeker moet ry om by die strand te kom.</i></p> <p><i>Foto 9</i></p> <p><i>Hierdie foto is meestal hoe dit omdraai plekke lyk voor die strand. Strand toe moet verder te voet wees.</i></p> <p><i>Daar is slegs een afdraai pad waar die aansoeker die kus kon bereik het, dit is by die strand waar die prospektersloot is. Op hierdie stukkie strand het meeue en swart tobies gesit. Die aansoeker sal die kus kan bereik, maar nie per pad nie, bloot omdat die strand groter is as die ander.</i></p> <p><i>Sien Foto 10, 11 en 12:</i></p> <p><i>Foto 10 Foto 11 Foto 12</i></p> <p><i>Foto 10: die pad draai af in die prospekter sloot in (die rigting van die prospektersloot is geel gemerk)</i></p> <p><i>Foto 11: die "mond" van die prospektersloot waardeur toegang tot die strand redelik maklik gekry kan word</i></p> <p><i>Foto 12: op hierdie strand was meeue en swart tobies ('n voël wat onlangs van die IUCN rooilys verwyder is)</i></p> <p><i>My beswaar is:</i></p> <p><i>a) daar is 'n wanpersepsie in die konsep BAV dokument oor hoe die aansoeker op die kus gaan kom.</i></p>	<p>It is correct that informal camping takes place on the proposed site and the harvesting of marine organisms such as kelp and lobsters as you have confirmed. It is also correct that the informal campers have left clearings on the proposed site.</p>
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	<p><i>Die aansoeker gaan volgens wat ek waargeneem het, geensins hierdie strande bereik alvorens daar nie redelik van die natuurlike omgewing weggevat gaan word nie.</i></p> <p><i>Daar gaan definitief pad gemaak moet word.</i></p> <p><i>b) die strande is ontoeganklik, die aansoeker gaan 'n baie groter voetspoor los as wat in die konsep BAV weergegee word.</i></p> <p><i>c) Al die paaie, behalwe een, loop dood in omdraai plekke vóór dit by die strand kom.</i></p> <p><i>Die aansoeker gaan deur natuurlike, bedreigde duineveld moet ry om by die strande te kom.</i></p> <p><i>d) Ek kon geensins bewyse kry dat kampeerders hierdie kuslyn gebruik nie. Ek kon nêrens sien waar tente of karavane opgeslaan is vir die pas afgelope Desember vakansie nie. Ek kon op een plek klippe sien wat in die parkeerarea gepak is en waarin vuur gemaak is, maar daar is nie plek vir tent of karavaan nie".</i></p>	
	<p><i>e) "Die konsep BAV is moontlik vol misleidende inligting rakende die werklike toestand van hierdie stukkie kuslyn.</i></p> <p><i>Voorsien asb die GPS koördinate van die areas, alreeds geïdentifiseer in die konsep BAV, waarop die toerusting gestoor gaan word.</i></p> <p><i>Voorsien asseblief die GPS koördinate van die toegangsroetes tot die strande wat geormerk is vir hierdie aansoek, aangesien daar nie paaie is na al die strande nie.</i></p> <p><i>Verduidelik asseblief hoe die aansoeker op die strande gaan kom waar strande opgedeel word deur rotse.</i></p> <p><i>Verduidelik asseblief hoe die aansoeker van plan is om al die magdom toerusting en aanleg op hulle plek te kry met die bestaande paaie wat strand toe lei.</i></p> <p><i>Verduidelik asseblief hoe die aansoeker voorsien om die prospektersloot te graawe volgens mates, die grondverskuiwings masjinerie op die strand te hê, tesame met die pompe en voertuie, plus die keerwal gaan stoot om die see tydens hoogwater uit te hou - alles op hierdie strande wat nie naastenby breed genoeg is nie, sonder om die natuurlike duineveld te verskuif / beskadig? Boonop beloof die aansoeker in die konsep</i></p>	<p>The exact location of the bulk sampling trenches, structures and infrastructure and other facilities for the proposed development will be finalised during the Environmental Impact phase of the application.</p>

	<p><i>BAV dat daar 'n buker tussen bedrywighede en die duine se voet gaan wees?</i></p> <p><i>Ek kan, veral na my besoek, nie sien hoe hierdie aansoek anders gaan as die totale stukkie kuslyn tot niet grawe en stoot nie. Ek kan ook nie sien dat enige spesialis 'n groen lig sal gee om hierdie afgeleë grepies strande, prys te gee vir 'n handvol diamante nie.</i></p> <p><i>Ek teken ten sterkste beswaar aan dat hierdie bedreigde, sensitiewe kusomgewing onder die bus gegooi moet word vir 'n produk waar daar alreeds 'n alternatiewe produk voor bestaan, nl sintetiese diamante.</i></p> <p><i>Ek vra dat die kwesbare strande die erkenning kry wat hulle bewaringstatus aan hulle verleen. Die swart tobie is van die IUCN rooilys afgehaal agv twee redes: eerstens oor die uitheemse mosselspesie wat 'n bykomende voedselbron bied, en tweedens omdat strandry verbore is en neste sodoende beter beskerm word. Hierdie voël raak tot 18 jaar oud en bly as volwasse voël, lewenslank in sy omgewing”.</i></p>	
	<p><b>2. Circus maurus</b></p> <p><i>“Daar is gevestigde neste van die hoogs bedreigde, endemiese witkruis vleivalk (black harrier) in die omgewing van die voorgenome prospekter aansoek. Hierdie voël broei slegs in ongerepte natuur en was die rede waarom 'n windplaas noordoos van hierdie voorgenome prospekter gebied afgekeur is.</i></p> <p><i>Let asseblief daarop dat, volgens protokol, 'n 5km radius rondom 'n bevestigde nes as 'n no-go area hanteer moet word. Hierdie radius geld vir windplase, asook prospektering.</i></p> <p><i>Ek stel voor dat daar spesifiek kontak gemaak word deur die beskermheer van hierdie spesie in Suid-Afrika, om seker te maak daar word aan protokol voldoen. Die beskermheer van hierdie spesie sal bevestig of daar neste binne 'n 5km radius is”.</i></p>	<p>A terrestrial biodiversity specialist has been appointed to investigate such issues and compile the required specialist report. The specialist report will be appended to the Draft Environmental Impact Report and you will be provided with the report as part of the public participation process.</p>
	<p><b>3. Slimesdamme wat moontlik sug</b></p> <p><i>“Daar is 'n moontlikheid dat die groot slimesdamme aan die oostekant van die gelyste pad, moontlik kan sug.</i></p>	<p>Thank you for highlighting the issue of the existing slimes dams near the proposed site. The matter will be taken into consideration during the Environmental Impact Reporting phase of the application.</p>



	<p><i>Hierdie sug is baie duidelik op verskeie plekke teen die kuslyn en die eKek kan in getypoele gesien word.</i></p> <p><i>Foto 14</i></p> <p><i>Die bewys van sug onderdeur die gelyste pad, oppad strand toe. Hierdie gelerige water loop in 'n straatjie onderdeur die pad is ook sigbaar is getypoele.</i></p> <p><i>Hierdie moontlike probleem is onder die Department Omgewingsake se aandag gebring, en is in die voorgenome area van hierdie prospekter aansoek. Ek voel dit is nodig dat die aansoeker van hierdie probleem bewus is.</i></p> <p><i>Baie dankie dat ek ekstra tyd gegun is om 'n bydrae te lewer"</i></p> <p>Vriendelike groete Mari Rossouw</p>	
<b>CapeNature (16/01/2024)</b>	<p>Good day</p> <p>Herewith CapeNature's comment on this application.</p> <p>Our ref: SSD14/2/6/1/8/3/ 4/151- Rietfontein extension, 4/152-Graauw Duinen_10454PR_DSR</p> <ol style="list-style-type: none"> <li>1. It is noted that this application is for prospecting between the low water mark and high water mark and will include 20 prospecting pits and 4 bulk sampling trenches.</li> <li>2. The plan of study regarding terrestrial biodiversity (inclusive of botanical and faunal aspects) and aquatic assessment is accepted and we await these specialist assessments for review.</li> <li>3. Note that a substantial buffer will be required to offset the prospecting operation and potential mining operation from the Sout estuary.</li> </ol> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>	Noted
I&AP	Comments received on Draft Environmental Impact Report	Response from EnviroAfrica
<b>M. Rossouw (24/06/2024)</b>	<p>Good morning Mr Nthejane</p> <p>I acknowledge your email, thank you!</p>	<p>Dear M. Rossouw,</p> <p>The following is contained in your electronic correspondence of 20 June 2024:</p>

<p>I feel that none of the questions I have asked in my previous email dated 20 June, has been answered.</p> <p>Please be so kind and provide answers to them, if possible.</p> <p>Thank you</p>	<p><i>"I provided comments on the dBAR document and submitted on 19 February 2023, and to date have not received any feedback.</i></p> <p><i>I am not sure if the fBAR has been submitted or where in the process this application from Fish by the Sea currently stands. Could you please provide more clarity regarding this?</i></p> <p><i>I would also like to bring to your attention that the community affected by this application faces several factors that can influence public participation.</i></p> <p><i>This stretch of coastline is a popular camping site among all income groups in the community, and the cost of data can be problematic. Searching for documents on your website can cause further issues since not everyone is computer literate. Poor network and cell phone reception add to the challenges. Not everyone has access to computer services to download this document.</i></p> <p><i>I would also like to bring to your attention that Afrikaans is the preferred language in the region, and I urge you to make the relevant documents available in Afrikaans. I further urge you to make hard copies of all documents related to this application available at strategic locations in the community".</i></p> <p>Please note that the statements contained in your correspondence will be in italics and the responses of EnviroAfrica thereto will be in bold normal text.</p> <ol style="list-style-type: none"><li>1. <i>I provided comments on the dBAR document and submitted on 19 February 2023, and to date have not received any feedback. EnviroAfrica never received any comment from you on 19 February 2024. <b>The only correspondence EnviroAfrica received from you was between 09 February 2024 and 18 February 2024 and the comment related to the Draft Scoping Report for the above-mentioned application. The proof of EnviroAfrica responding to all your correspondence received</b></i></li></ol>
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between 09 February 2024 and 18 February 2024 is attached hereto for your convenience.

2. *I am not sure if the fBAR has been submitted or where in the process this application from Fish by the Sea currently stands. Could you please provide more clarity regarding this? The application for Fish by the Sea that EnviroAfrica is processing is a Scoping and Environmental Impact Reporting application and not a basic assessment application.*

3. *I would also like to bring to your attention that the community affected by this application faces several factors that can influence public participation.*

*This stretch of coastline is a popular camping site among all income groups in the community, and the cost of data can be problematic. Searching for documents on your website can cause further issues since not everyone is computer literate. Poor network and cell phone reception add to the challenges. Not everyone has access to computer services to download this document. It is required in Regulation 41 that written notification of the development proposal be given to the relevant Local and District Municipalities, relevant Councillor of the Ward where the proposed site is located, landowners and occupiers of land immediately neighbouring the proposed site, the landowner if the Applicant is not the landowner, relevant Organs of State and State Departments that administer a law relevant to the development proposal and that a newspaper advertisement be published in a local newspaper for a development proposal that is of local importance. The aforesaid legal requirements*

		<p>have been met in that <i>inter alia</i>, written notices were put on different parts of the proposed site, a newspaper advertisement was placed in a local newspaper and written notices were given to all the other Interested and Affected Parties stipulated in Regulation 41.</p> <p>4. <i>I would also like to bring to your attention that Afrikaans is the preferred language in the region, and I urge you to make the relevant documents available in Afrikaans. I further urge you to make hard copies of all documents related to this application available at strategic locations in the community. Please note that English, Afrikaans and IsiXhosa are the official languages in the Western Cape Province and therefore it is adequate for notices in the Western Cape Province to be written in English.</i></p> <p><b>In addition, the forms to be completed and submitted to the competent authority for decision-making are written in English. The completed forms will not be translated to Afrikaans, as any loss of meaning that may arise when translating can be viewed as a case of the Applicant and EnviroAfrica attempting to mislead Interested and Affected Parties and that can cause serious legal issues. The notices and reports for the application have been made available in a manner that meets the legal requirements.</b></p>
<p>M. Rossouw (20/06/2024)</p>	<p>Good afternoon</p> <p>I acknowledge receipt of the email.</p> <p>I provided comments on the DBAR document and submitted on 19 February 2023, and to date have not received any feedback.</p>	<p>Good morning M. Rossouw,</p> <p>Please be reminded that EnviroAfrica did respond to all of the issues that you raised when you commented on the Draft Scoping Report for this application. The issues that you are raising now are contained in your</p>

	<p>I am not sure if the fBAR has been submitted or where in the process this application from Fish by the Sea currently stands. Could you please provide more clarity regarding this?</p> <p>I would also like to bring to your attention that the community affected by this application faces several factors that can influence public participation.</p> <p>This stretch of coastline is a popular camping site among all income groups in the community, and the cost of data can be problematic. Searching for documents on your website can cause further issues since not everyone is computer literate. Poor network and cell phone reception add to the challenges. Not everyone has access to computer services to download this document.</p> <p>I would also like to bring to your attention that Afrikaans is the preferred language in the region, and I urge you to make the relevant documents available in Afrikaans. I further urge you to make hard copies of all documents related to this application available at strategic locations in the community.</p>	<p>previous correspondences that EnviroAfrica responded to in writing.</p>
<p>National Department of Forestry, Fisheries and the Environment (21/06/2024)</p>	<p>Good morning, Ms Christians.</p> <p>This serves to confirm receipt of email correspondence.</p>	<p>Noted</p>
<p>Miles Materson (02/07/2024)</p>	<p>Good day</p> <p>Kindly note that it seems that the Wettransfer link to download documentation for this application has expired.</p> <p>Please kindly advise as Protect the West Coast will be publicising this application on our website shortly.</p> <p>Many thanks</p>	<p>Good day M. Materson,</p> <p>Please find a newly generated We Transfer link <a href="https://we.tl/t-rhWPTjmPhT">https://we.tl/t-rhWPTjmPhT</a> for accessing the Draft Environmental Impact Report and associated appendices. The Draft Environmental Impact Report and associated appendices can also be accessed by clicking on the website of EnviroAfrica, i.e., <a href="http://enviroafrica.co.za/projects/for-public-participation/">enviroafrica.co.za/projects/for-public-participation/</a> and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".</p> <p>The new We Transfer link will expire in approximately one week from today.</p>
<p>Max Elkinton (09/07/2024)</p>	<p>I have spent a lot of time travelling that coastline with my family over the years. It is beautiful and that stretch of coastline</p>	<p>The application is for alluvial diamonds prospecting with bulk sampling on the proposed site and is not for mining. An</p>

	<p>has some of the best waves in the world. Surfers from all over the world travel to surf the area. The area is a tourist attraction as it is some of the last untouched beautiful coastline we have.</p> <p>I have seen what the mines have done further south. The mines have destroyed the beaches and the wildlife. Leaving it as a pile of black dirt. Please leave these beaches alone.</p>	<p>EMPr as well as a Rehabilitation and Closure Plan have been compiled for the proposed prospecting with bulk sampling and the implementation thereof will minimise the potential environmental impacts of the proposed prospecting with bulk sampling.</p>
<p>Konstant van Huyssteen (09/07/2024)</p>	<p><b>I, Konstant van Huyssteen, hereby object to the Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp.</b></p> <p>My contact details are as follows:</p> <p>109 Edward Court, 41 Beach Road, Cape Town, 8005. email: <a href="mailto:konstantvanhuyssteen@gmail.com">konstantvanhuyssteen@gmail.com</a> (preferred method of communication)</p> <p><b>Project Name</b></p> <p>Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp</p> <p><b>DMRE Ref No</b></p> <p>WC 50/1/1/2/10454/ PR</p> <p>I have no business interest in the application.</p> <p>I do have a personal interest in the objection against the application.</p> <p>My comments are that the "Decommissioning Phase" of the majority of coastal mining activities on the West Coast are not properly enforced, nor are the mining companies held liable for the devastation they cause.</p> <p>In the current diamond market, where lab-grown diamonds have infiltrated the organic diamond supply, destroying an irreplaceable piece of nature to dig up</p>	<p>Noted.</p> <p>This application is for alluvial diamonds prospecting with bulk sampling on the proposed site as you have correctly mentioned and is not an application for a mining permit or a mining right. In view</p>

	<p>some stones that could be synthesised in a lab, is backward thinking.</p> <p>Best</p> <p>Kon van Huyssteen</p>	<p>of this, your comment on previous inadequate enforcement of the decommissioning requirements of mining activities is not relevant to this application.</p> <p>In addition, even if this was an application for a mining permit or mining right, the lack of previous enforcement of decommissioning requirements by officials does not erase the legal right of the Applicant to pursue this alluvial diamonds prospecting with bulk sampling application.</p> <p>It is more appropriate and helpful to blow the whistle early via the correct channels when unlawfulness by mining companies has taken place and when dereliction of duty by enforcement officials has taken place, than to burden Fish by the Sea (Pty) Ltd with the suspicion that this application is going to cause further unlawfulness.</p> <p>The Applicant has the right to prefer natural diamonds over artificial diamonds and the Applicant has the legal right to pursue this application for alluvial diamonds prospecting with bulk sampling.</p>
<p>Tayla-Paige van Sittert (09/07/2024)</p>	<p>This email serves as an application to register as an Interested and Affected Party (I&amp;AP) and to submit my concerns for the new bulk diamond prospecting application in the heavily mined West Coast zone.</p> <p>I am Tayla-Paige van Sittert and I prefer to be contacted via email.</p> <p>I reject the proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp</p> <p>DMRE Ref No: WC 50/1/1/2/10454/ PR</p> <p>I do not support the project of gouging out the Earth to determine the potential to mine in full, according to the Environmental Impact Report (IER) and Environmental Management Programme (EMPr).</p> <p>It is obscene to dig holes for diamonds in the centre of an ecologically sensitive</p>	<p>Noted</p> <p>The prospecting pits and bulk sampling trenches will be confined to a land strip</p>

<p>area, which is also popular for recreational activities and local communities, who rely on their catches for sustenance and income.</p> <p>It is not enough that the Fish by the Sea application claims the effect of this prospecting on fauna and flora at the location will be zero – and the EMPr stipulates several measures aimed at preventing any damage during the prospecting process – because the documentation also concedes that the proposed site overlaps a marine Critical Biodiversity Area.</p> <p>The full-scale mining that is likely to follow could very well eradicate this sensitive ecosystem, which is a tragedy of the largest scale.</p> <p>I don't want to live in a country that so willingly pushes environmental and social concerns aside in order to profit. These priorities can have dire circumstances as not only do local creatures communities need the diverse fauna and flora intact for their very survival, but the region relies on tourism and an active interest in visiting such pristine nature. If the environment is damaged, our lives become dismal.</p> <p>I support Protect The Wild Coast's pleas with the authorities for a moratorium on all mining applications, and a Strategic</p>	<p>located between the high-water mark and low-water mark of the sea, where no vegetation exists. In addition, the sea is highly active between the low-water and high-water mark of the sea, with wave action always redistributing sediment between areas of less sediment and areas of more sediment. The areas of less sediment that will result where the prospecting pits and trenches are excavated will therefore return to a condition similar to the pre-prospecting with bulk sampling condition soon after the Rehabilitation and Closure Plan has been implemented.</p> <p>It has not been claimed in the Draft EIR and associated appendices that the potential impact of the proposed development on fauna and flora is non-existent. However, it is explained by the appointed EAP in the Draft EIR and by the specialist professionals in specialist reports that informed the Draft EIR, that the potential impacts of the proposed development will be of medium to low significance upon implementation of the impact mitigation measures contained in <i>inter alia</i>, the EMPr.</p> <p>It is unknown at this point in time, whether or not the Applicant will pursue an application for a mining right if the competent authority decides to authorise the proposed prospecting with bulk sampling. It is therefore premature at this point in time to discuss the impact of a full-scale mining project that that may never become a reality.</p> <p>The whole aim of this EIA process is to help ensure that <i>inter alia</i>, the ecological, social and economic considerations relating to the proposed development are taken into account by the competent authority when making a decision on the application.</p>
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	<p>Environmental Assessment (SEA) for the entire region.</p> <p>Thank you for your consideration. I trust this is all in order.</p>	
<p>Kate Ahrends (10/07/2024)</p>	<p>I am hugely appalled at the prospects of this operation being carried out. There is absolutely no regard for the future of this coastline in the long run and the radical environmental damages it will cause in an area that is so ecologically sensitive. Apart from this being a recreational area for hikers, surfers and local communities, this area is also where local fishermen get their income and sustenance. These communities are continually overlooked by the government, for money grabbing capitalist business opportunities which yield no value for local economy.</p> <p>In a world with climate concerns growing rapidly, this is NOT what should be permitted. We should be protecting these coastlines which belong to a diversity of animal and plant life.</p> <p>I have no financial interest in this decision. I am writing to you because this is WRONG on so many fronts and decisions should be made with greater foresight into the future than the short gains of possibility.</p> <p>Thank you for reading this, I hope it lands with understanding.</p>	<p>The whole aim of this EIA process is to help ensure that <i>inter alia</i>, the ecological, social and economic considerations relating to the proposed development are taken into account by the competent authority when making a decision on the application for diamonds prospecting with bulk sampling.</p> <p>It has been explained in the Draft EIR and associated appendices how the potential negative environmental impacts of the proposed development that include <i>inter alia</i>, the potential environmental impacts that you have mentioned, will be prevented or kept at medium to low significance levels and how the beneficial impacts will be maximised. The concerns that you have raised regarding the potential environmental impacts of the proposed development have therefore not been overlooked.</p> <p>The Draft EIR includes an EMPr and a Rehabilitation and Closure Plan. The implementation of the EMPr will help ensure that after completion of the proposed prospecting with bulk sampling, the proposed site returns to a condition similar to the condition of the proposed site prior to commencement with the proposed prospecting with bulk sampling.</p>
<p>Jason Smith (10/07/2024)</p>	<p>Please note my objection to the following project:</p>	<p>It has been explained in the Draft Environmental Impact Report and associated appendices, how the potential negative environmental impacts of the proposed diamonds prospecting with bulk sampling will be kept at medium to low levels through the implementation of <i>inter alia</i>, the Environmental Management Programme and the Rehabilitation and Closure Plan.</p>
<p>John Yeld (10/07/2024)</p>	<p>Kindly register me as an IAAP for the following project for which I understand EnviroAfrica is the environmental practitioner. Please will you confirm receipt of my email.</p>	<p>It is hereby confirmed that EnviroAfrica has added your name to the list of Interested and Affected Parties.</p>

<p>Marc Rogoff (10/07/2024)</p>	<p>I am writing to object in the strongest terms to the proposed project above. The environmental impact will be immense as it is with all alluvial diamond prospecting. Affecting wildlife from top to bottom of the food chain and ruining the beauty of the area.</p>	<p>It has been explained in the Draft Environmental Impact Report and associated appendices, how the potential negative environmental impacts of the proposed diamonds prospecting with bulk sampling will be prevented or kept at medium to low levels through the implementation of <i>inter alia</i>, the Environmental Management Programme and the Rehabilitation and Closure Plan.</p>
<p>Greville White (10/07/2024)</p>	<p>I wish to register as an IAP for this project.  I have a personal interest in the matter, and if you could please use my email <a href="mailto:greville@mweb.co.za">greville@mweb.co.za</a> for correspondence.</p>	<p>It is hereby confirmed that EnviroAfrica has added your name to the list of Interested and Affected Parties.</p>
<p>Diana Ruizcoogan (10/07/2024)</p>	<p>My comment on the above stated project proposal: I am a concerned SA citizen and would like to let you know that the project stated below should be halted. Mining should be stopped in this zone, due to its ecological sensitivity and importance, as well as its recreational uses enjoyed by many. Our natural environment is finite and should be protected for current and future generations to come.  The mines which do exist have a very large footprint and have destroyed irreplaceable natural landscapes.</p>	<p>The application is for alluvial diamonds prospecting with bulk sampling on the proposed site and is not for a mining permit nor mining right.  An EMPr as well as a Rehabilitation and Closure Plan have been compiled for the proposed diamond prospecting with bulk sampling and the implementation thereof will help to prevent or minimise the potential environmental impacts of the proposed prospecting with bulk sampling.  In addition, the potential socio-economic benefits of the proposed development will be maximised.</p>
<p>Grettchen Barret (11/07/2024)</p>	<p>Environmental disaster for all the flora, fauna and communities in the area. No benefit to any of aforementioned but only company involved.</p>	<p>The Draft Environmental Impact Report includes an Environmental Management Programme Report ("EMPr") and a Rehabilitation and Closure Plan.  The implementation of the EMPr and the Rehabilitation and Closure Plan will help ensure that after completion of the proposed prospecting with bulk sampling, the proposed site returns to a condition similar to the condition of the proposed site prior to the commencement of the proposed prospecting with bulk sampling. The proposed development will therefore result in medium to low environmental impacts and will not result in any kind of environmental disaster.  The proposed prospecting with bulk sampling is a small project that will somewhat alleviate the severe unemployment in the area by providing</p>

		<p>some employment opportunities. However, it is only if the proposed prospecting with bulk sampling indicates that mining is economically feasible on the proposed site that the Applicant may consider lodging an application for a mining right and if such mining right application leads to a mine being established on the proposed site, long-term employment opportunities at the mine and other related socio-economic benefits in the area will result.</p>
<p>Rohan Etsebeth (11/07/2024)</p>	<p>I lived in Garies and surfed on the West Coast in my youth. My family also own a house in St Helena Bay. We also know people who do tours with donkeys or 4x4's or just hiking. This mining will certainly kill the beauty of this area. Even just 4x4's are damaging to the sensitive biodiversity of the West Coast if not managed; mining is completely dismantling the West Coast and the mining applications are always sugar coating how they will tread lightly, only to leave the sites in conditions that will never be able to return to its former state. Not even remotely. I stand opposed to the Environmental Impact Report and Environmental Management Programme Report as I know how bad mining areas look once mining has been concluded. The only way to protect our natural environment is to not allow mining on it.</p> <p>My preferred method of notification will be email.</p>	<p>The proposed development is for alluvial diamonds prospecting with bulk sampling on the proposed site and is not an application for a mining right nor a mining permit.</p> <p>The prospecting pits and bulk sampling trenches will be confined to a land strip located between the high-water mark and low-water mark of the sea, where no vegetation exists. In addition, the sea is highly active between the low-water and high-water mark of the sea, with wave action always redistributing sediment between areas of less sediment and areas of more sediment. The areas of less sediment that will result where the prospecting pits and trenches are excavated will therefore return to a condition similar to the pre-prospecting with bulk sampling condition soon after the Rehabilitation and Closure Plan has been implemented.</p>
<p>KOOS COETZEE PROKUREURS ING (22/07/2024)</p>	<p>We act on behalf of Cawood Salt Works (Pty) Ltd as the owners of Cawood Farm No. 513, and wish to provide commentary on the scoping report submitted, concerning reference number WC 50112/10454 PR</p> <p><b>IMPACT ON SALT MINING ACTIVITIES</b> Our primary concern lies in the potential impact of the dust generated by mining activities on our client's salt works. Cawood Salt Works (Pty) Ltd extracts salt from seawater and any contamination or interference caused by the mining activities could significantly affect the quality and purity of their salt works.</p>	<p>Noted</p> <p>The proposed prospecting with bulk sampling activities will include implementing dust suppression measures such as keeping the excavated material wet, enforcing speed limits on vehicles that come to and vehicles that leave the proposed site etc.</p>

<p>Furthermore, the process of salt extraction involves the evaporation of seawater in specially constructed evaporation ponds. The concentrated brine left behind after evaporation is then further processed to extract salt crystals which are then harvested for commercial use.</p> <p><b>ADVERSE EFFECTS ON ANCIENT DUNES</b></p> <p>The proposed prospecting activities have the potential to negatively impact these salt deposits by disrupting the natural processes that contribute to their formation. By disturbing the surrounding environment and potentially altering the flow of seawater, the mining activities could alter the delicate balance required for salt formation.</p> <p><b>LONG TERM VIABILITY OF SALT MINING OPERATIONS</b></p> <p>Cawood Salt Mining (Pty) Ltd foresees that the salt mining operations can continue for over 50 years, providing stable employment for more than 70 individuals. The closure of the salt mine would have significant socio-economic consequences, affecting not only the employees and their families but also the local community that relies on the mine for their economic activity.</p> <p><b>PROXIMITY OF CAWOOD'S PROPERTY TO PROSPECTING AREA</b></p> <p>It is important to note that Cawood Salt Works (Pty) Ltd's property is adjacent to land on which Fish by the Sea intends to prospect. As an affected entity, Cawood Salt Works Pty Ltd is directly influenced by the proposed prospecting activities, which have the potential to disrupt their operations and the surrounding environment.</p> <p><b>CAWOOD'S POSITION</b></p> <p>Cawood Salt Works Pty Ltd does not object to the proposed prospecting activities and is supportive of initiatives that promote economic development. However, Cawood strongly emphasises that any adverse impacts such as dust generation and changes to the dunes that could jeopardise their continued operation will be vehemently opposed.</p>	<p>The proposed diamonds prospecting with bulk sampling will not alter the flow of seawater nor disrupt any natural processes that contribute to the formation of salt deposits.</p> <p>Noted</p> <p>The EMPr for the proposed prospecting with bulk sampling includes measures for minimising any kind of disturbance to the existing environment, including disturbance to landuses near the proposed site.</p> <p>A Rehabilitation and Closure Plan has also been compiled so that upon</p>
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	<p>In conclusion, while Cawood Salt Works Pty Ltd is open to development that benefits the economy, measures must be taken to mitigate any potential harm to their salt mining operations and the surrounding environment. It is crucial Fish by the sea Pty Ltd considers these concerns and works towards a mutually beneficial solution.</p>	<p>completion of the prospecting with bulk sampling project, the environment can be restored to a condition resembling the condition of the environment prior to commencement of the proposed prospecting with bulk sampling.</p> <p>Please go ahead and review the EMPr and the Rehabilitation and Closure Plan.</p> <p>Noted</p>
	<p>I am contacting you today on behalf of the PTWC in relation to the Proposed Prospecting for Diamonds with Bulk Sampling on an Approximately 121ha Area Between the Low-Water and High-Water Mark of the Sea: Portion 4 of the Farm Rietfontein Extension no. 151 and Portion 4 of the Farm Graauw Duinen no. 152, Vanrhynsdorp, DMR Ref: WC 50/1/1/2/10454/ PR.</p> <p>The PTWC was established in 2020 by a group of concerned citizens who aim to prevent the continued exploitation of the West Coast caused by destructive mining activities. The team consists of a collective of concerned South Africans (including scientists, journalists, legal and media experts) who work for the organisation to ensure that mining on the West Coast is conducted with the correct and proper oversight in accordance with the fundamental principles of the law.</p> <p>The PTWC requests that the organisation be registered as an Interested and Affected Party in connection to the above prospecting application. Further, the PTWC submits the following comments in objection of said prospecting application:</p> <p>"Protect The West Coast objects to the proposed prospecting application (DMR Ref: WC 50/1/1/2/10454/ PR) on the grounds that such application may have a significant adverse impact on nearby communities and the environment.</p>	<p>Noted</p>

	<p>As per the application, this proposed prospecting activity will overlap areas classified as 'Critical Biodiversity Areas' (CBAs) (see pages 6 to 7 of the Environmental Management Programme attached herein for reference). These areas are defined as terrestrial (for example, threatened vegetation type remnants) and/or aquatic features (for example, vleis, rivers and estuaries), and buffer areas along aquatic CBA features, whose safeguarding is critically required in order to meet biodiversity pattern and process thresholds. Such areas are identified through a systematic biodiversity planning approach and represent the most land-efficient option to meeting all thresholds. The proposed prospecting application can disturb the CBAs and risk jeopardising an area that is essential to maintaining the aforesaid thresholds, which may lead to irreversible damage of which may then potentially impact nearby communities that are dependent on such areas. It is on these grounds that the proposed prospecting application cannot proceed and must be denied approval."</p> <p>Kindly acknowledge receipt thereof. We look forward to hearing from you soon.</p>	<p>It is true that the proposed site overlaps Critical Biodiversity Areas as indicated in the Draft Environmental Impact Report and associated appendices. However, this does not mean that development in Critical Biodiversity Areas is banned.</p> <p>The proposed diamonds prospecting with bulk sampling therefore requires that an assessment of its potential environmental impacts be conducted. If the outcome of the assessment is that the potential negative impacts of the proposed development can be kept sufficiently low, the competent authority is likely to authorise the proposed development. If the outcome of the assessment is that the potential negative impacts of the proposed development cannot be kept sufficiently low, the competent authority is likely to issue an environmental authorisation refusal for the proposed development.</p> <p>Please go through the Draft Environmental Impact Report and all its associated appendices and you will notice that EnviroAfrica as well as the specialist scientists that compiled the specialist study reports have all concluded that the proposed prospecting with bulk sampling on the proposed site will result in medium to low environmental impacts upon the implementation of the required impact mitigation measures.</p> <p>The competent authority must ultimately make a decision on the application as explained above.</p>
<p>Emily Winter (22/07/2024)</p>	<p>This project is invasive and destructive and will have a devastating effect on the ecosystems and wildlife in this sacred area.</p> <p>Myself and many others who often visit the west coast and use these beaches and waves will be directly affected by the destruction of them.</p>	<p>Please review the Draft Environmental Impact Report and its associated appendices that include <i>inter alia</i>, the specialist reports compiled by the appointed specialist scientists.</p> <p>The implementation of the Environmental Management Programme Report compiled for the development proposal will help to ensure that the potential environmental impacts of the proposed prospecting and bulk sampling operations are minimised.</p> <p>The implementation of the Rehabilitation and Closure Plan will help to ensure that when the proposed prospecting with bulk sampling operations have ended,</p>

		<p>the proposed site soon recovers to a condition similar to the condition of the proposed site prior to the commencement of the proposed prospecting with bulk sampling operations.</p>
<p>DEA&amp;DP (22/07/2024)</p>	<p>3. The Department has reviewed the Comments and Response Report (“C&amp;RR”) that formed part of the Public Participation Report (Appendix 5), which contains the EAP’s response to our comments on the DSR. It is noted that not all the comments have been adequately captured by the EAP and therefore not adequately addressed in the C&amp;RR. Notwithstanding, please find comments from various directorates within the Department on the Draft EIA Report dated 18 May 2024 and accompanying documents/annexures that were available for download from online platforms.</p> <p>4. This Directorate’s comments on the DSR requested confirmation regarding the suitability and lawfulness of the existing access routes for the use of machinery during invasive prospecting activities. The EAP’s response is indicated as “noted” as this Directorate’s comment was not accurately captured in the C&amp;RR.</p> <p>5. Per our previous comments on the DSR, the Screening Tool Report generated on 15 January 2024 identified a low sensitivity for the defence and civil aviation themes. The EAP has disputed these ratings and indicated that the sensitivity ratings should be negligible. Please be advised that the sensitivity ratings as identified by the screening tool should be confirmed as:</p> <p>5.1. The Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation (“the Protocols”) published in Government Gazette<sup>1</sup>, do not make provision for negligible ratings.</p>	<p>4. The existing public road that Tronox Mining has upgraded for accessing the seawater intake of Tronox will be used to connect to off-road tracks that extend a short distance to the proposed site. These off-road tracks are suitable for usage without requiring any upgrades and are the result of trampling by <i>inter alia</i>, ordinary members of the public making use of their legal right to access the sea, trampling by informal campers and kelp collectors and trampling by off-road motor cyclists.</p> <p>5.1 The sensitivity rating of Negligible indicated by the EAP is a statement of fact.</p>

<p>5.2. The Procedures do not require any specialist assessment where the rating is of low sensitivity for the defence or civil aviation themes.</p> <p>6. The EAP has disputed the very high sensitivity for the aquatic biodiversity theme as the proposed prospecting and bulk sampling will be set back at least 600m back from the wetlands of the Sout River. This Directorate acknowledges that although the Department of Water and Sanitation ("DWS") was consulted during the scoping phase, no comments were received from the DWS on the DSR. To ensure compliance with the Protocol for the specialist assessment and impacts on aquatic biodiversity (GN No. 320 of 20 March 2020), please consult ndobenin2@dws.gov.za from the DWS to confirm that no Aquatic Biodiversity Compliance Statement is required.</p> <p>7. Table 3 of the Draft EIA Report indicates that the waste management activity listed in Category A3(15) of GN No. 921 of 29 November 2013 (as amended) is being applied for. This Directorate's comments on the DSR requested that the specified activity must be confirmed, with the Draft EIA Report to report on certain requirements of the Regulations Regarding the Planning and Management of Residue Stockpiles and Residue Deposits from a Prospecting, Mining, Exploration or Production Operation published in GN No. R. 632 of 24 July 2015. The C&amp;RR indicates the EAP's response as "noted". Please confirm the applicability of the specified activity as:</p> <p>7.1. The Draft EIA Report is silent on the requirements of the Regulations Regarding the Planning and Management of Residue Stockpiles and Residue Deposits from a Prospecting, Mining, Exploration or Production Operation.</p> <p>7.2. Throughout the Draft EIA Report it is indicated that "No Tailings and Fine residue (slimes) dumps will be created."</p> <p>7.3. The C&amp;RR indicates that a prospecting trench "will remain open for a maximum of 2 days". Since only one trench will be operational at a time and 4</p>	<p>5.2 Noted</p> <p>6. The boundary of the prospecting trench that is nearest to the mouth of the Salt River will be kept back at least 1.3km from the river mouth. The National Department of Water and Sanitation will be requested again to provide comment on the application.</p> <p>7. The listed waste management was included in Table 3. in case the licensing authority deems the listed waste management activity relevant to the application.</p> <p>However, EnviroAfrica is of the view that excavating overburden from the proposed site and using the overburden to build temporary dykes does not constitute the establishment of residue stockpiles. This is the view of EnviroAfrica, as no chemical processing of the overburden will take place and the overburden will be used for backfilling and rehabilitating excavations at the same time that the proposed prospecting with bulk sampling is progressing.</p> <p>7.2 Indeed no tailings and fine residue dams will be created.</p> <p>7.3. It is only on a small portion of a trench that adequate prospecting with bulk sampling can be done at any particular time. The period of two days</p>
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<p>trenches are proposed, equating a maximum operation of 8 days, it is questioned if the specified activity and the Regulations are indeed applicable to this application.</p> <p>It is recommended that the EAP consult with the competent authority to confirm whether the proposed 5m high berm around the trench would be regarded as a residue stockpile.</p> <p>8. It is noted that less than 80m<sup>3</sup> of fuel for equipment will be stored in the parking area. Please note that the development and related operation of facilities or infrastructure for the storage and/or handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30m<sup>3</sup> but less than 80m<sup>3</sup> outside urban areas, triggers Activity 10 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).</p> <p>However, since Activity 19 of Listing Notice 2 includes all other listed activities contained in Listing Notices 1 – 3 of the EIA Regulations, 2014 (as amended), authorisation is not required for Activity 10 of Listing Notice 3, provided that the impacts of said activity are identified and addressed.</p> <p>9. Ideally, the description of the affected environment should have been extracted from the various specialist assessments that provided detailed information on the environmental attributes associated with the development footprint focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects. This is required by regulation 3(1)(k) of Appendix 3 of the EIA Regulations, 2014 (as amended), which requires a summary of the findings and recommendations of any specialist report. Instead, the Draft EIA Report refers to information obtained from other sources. This particularly relates to the lack of description of the coastal dune system, beach environment and some rocky headlands as described in Botanical-Biodiversity Assessment prepared by Bergwind Botanical Surveys</p>	<p>refers to the length of time that a berm is expected to keep the sea from flooding a trench, without the berm requiring maintenance work. The proposed prospecting with bulk sampling activities on the entire proposed site of four trenches will last up to sixty months, inclusive of final decommissioning and closure.</p> <p>It is highly unlikely that the competent authority would view the berm as a residue stockpile.</p> <p>8. The potential impacts of storing less than 80m<sup>3</sup> of fuel on the proposed site have been identified among other potential environmental impacts and have also been addressed in the EMPr.</p> <p>9. The description of the environment in the vicinity of the proposed site as provided by the EAP and the description of the same environment as provided by the specialists do not contradict each other. The descriptions complement one another and should be read together.</p>
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<p>&amp; Tours CC dated June 2024.</p> <p>10. Please amend Figure 4 and Appendix 1 (detailed site layout plan) to indicate the location of the proposed 20 prospecting pits. This was also requested by the competent authority in its acceptance of the Final Scoping Report ("FSR") on 04 April 2024. Please further note that regulation 3(1)(l)(ii) of Appendix 3 of the EIA Regulations, 2014 (as amended) require that "An environmental impact Assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include an environmental impact statement which contains a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers" (emphasis added). The various environmental sensitivities as identified in the specialist assessments (e.g., critical biodiversity areas, ecological support areas, etc.) and no-go areas, if any, must be indicated.</p> <p>11. Further to the above, the coordinates of the 20 prospecting pits must be provided in addition to what is provided in Table 2 (coordinates of bulk sampling trenches). This was also requested by the competent authority in its acceptance of the FSR.</p> <p>12. It is recommended that the Draft Environmental Management Programme ("EMPr") included as Part B of the Draft EIA Report and the Draft EMPr dated June 2024 (Appendix 13) be reconciled so that one EMPr is available for review and implementation, should environmental authorisation ("EA") be granted.</p> <p>13. The EMPr included as Part B and the standalone EMPr do not include all the impacts and recommendations of the various specialists, as required by regulation 3(1)(k) of Appendix 3 of the EIA Regulations, 2014 (as amended).</p> <p>The Draft EIA Report did not include the complete impact assessment as indicated by the various specialists, e.g. not all the</p>	<p>10.. The 16 points representing the prospecting pits could not included in Figure 4, as this causes the figure to become cluttered. However, the 16 prospecting pits are contained within the four on-site bulk sampling trench areas depicted in Figure 4</p> <p>The prospecting pits and the bulk sampling trenches are the only infrastructure that will have permanent positions on the proposed site. All other structures and infrastructure will keep being re-positioned as the proposed prospecting with bulk sampling and concurrent rehabilitation take place.</p> <p>The entire area beyond the high-water mark of the sea in the vicinity of the proposed site is deemed a 'no-go' area and so it is only existing access tracks that will be used to access the proposed site and only bare patches will be used for the placement of structures beyond the high-water mark of the sea.</p> <p>11. The coordinates of the 16 prospecting pits are provided in Table 3</p> <p>12. The EMPr provided as Appendix 13 of the Draft EIR complements and does not contradict the EMPr that forms part of the template of the competent authority.</p> <p>13. The recommendations have all been included.</p> <p>The impacts identified in the specialist reports and the recommendations and impact mitigation measures are all</p>
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	<p>impacts identified in section 4.2 of the Marine Ecology Assessment compiled by Pisces Environmental Services (Pty) Ltd dated February 2024 have been included in the EIA Report. Similarly, the EIA Report did not include all the recommendations and mitigation measures of said specialist assessment as identified in section 4.2, as well as the Mitigation and Management Plan identified in section 6.8, which details the specific management commitments that should be implemented to prevent, minimise or manage significant negative impacts.</p> <p>14. The EMPr included as Part B states that: "It is hereby requested that the environmental authorisation be made valid for a period of 10 years, as 10 years is the limit to which an environmental authorisation can remain valid without a detailed Part 2 amendment process having to be followed." Please note that this request cannot be entertained as section 17(6) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) ("MPRDA") states that: "A prospecting right is subject to this Act, any other relevant law and the terms and conditions stipulated in the right and is valid for the period specified in the right which period may not exceed five years." Furthermore, section 18(4) of the MPRDA, 2002 states that "A prospecting right may be renewed once for a period not exceeding three years." It is thus clear that the EA may only be valid for a period not exceeding 8 years.</p> <p>15. General:</p> <p>15.1. The competent authority's reference number as indicated on the cover page of the Draft EIA Report is incorrect.</p> <p>15.2. The Underwater Heritage Impact Assessment compiled by Vanessa Maitland dated 14 July 2023, undertaken as part of a previous prospecting right application by the applicant (WC 30/5/1/1/2/10434PR), must be submitted to the South African Heritage Resources Agency for their comments.</p> <p>15.3. Please indicate where waste from the tough bags processed for the final recovery of diamonds will be backfilled. Will this be within the prospecting trenches or pits?</p>	<p>included in the revised Draft EIR, although the wording and sequencing is not always identical to that contained in the specialist reports.</p> <p>14. The period of 10 years has been amended to eight years.</p> <p>15.1 Corrected</p> <p>15.3 Done</p> <p>15.3 The material from the tough bags that will remain after the recovery of diamonds will be returned to the proposed site.</p>
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<p>will therefore not be able to assess and comment on where the proposed no-go areas are. It is essential that the no-go areas are identified upfront so that the competent authority make an informed decision during the decision-making process.</p> <p>19. This Directorate holds the view that there are sufficient resources available, using aerial photography and the appointed specialists, to already have identified no-go areas, even if preliminary with further refinement at a later stage. This is evident in the Botanical-Biodiversity Assessment which concluded that: "Based on the data collected and analyzed for the Bulk Sampling Project in the designated area, the negative impact is rated as Medium Negative overall, but it would be possible to mitigate it to Low Negative. Taking all the ecological factors into consideration, and as long as good practice is implemented, and the No Go areas observed..." The risk is that no-go areas are to be identified outside the EIA process, which is procedurally flawed as it limits I&amp;APs scrutiny on significant aspects and impacts and creates uncertainty as to where the no-go areas are to be allocated. If no go-go areas are not adequately observed, it would raise the impact risk rating profile.</p> <p>20. Cumulative impacts are a significant aspect that must consider the possibility of other proponents also attaining prospecting or mining rights within and near the same area (30km radius). Given the lack of a strategic environmental assessment for the area, the cumulative impact(s) cannot be adequately addressed and managed.</p> <p>21. This Directorate's comment on the DSR stated that the statement regarding bulk sampling until approximately 1 000 carats has been recovered, appears to provide a caveat that is open ended, which could be interpreted as an open-ended condition that determines the extent of activity, rather than the extent of the drill holes and trenches. The EAP's response is given as "noted" with no clarification provided. This response is inadequate.</p> <p>22. Considering the above comments, this Directorate does not support the proposal.</p>	<p>water mark of the sea that will be used for placing structures relating to he proposed development are existing bare patches and existing access tracks will be kept to.</p> <p>19. The no-go areas are all the areas that are located below the low-water mark of the sea and all the areas located above the high-water mark of the sea in the vicinity of the proposed site. The only areas above the high-water mark of the sea that will be used for placing structures relating to he proposed development are existing bare patches and existing access tracks will be kept to.</p> <p>20. A strategic Environmental Assessment ("SEA") conducted for the proposed site and surrounding area would have been ideal. However, the SEA does not exist, is beyond the scope of the EIA process and is therefore not for the Applicant and EnviroAfrica to conduct.</p> <p>21. The maximum length, breadth and depth of the bulk sampling pits is provided in the description of the proposed development and these dimensions will not be exceeded.</p> <p>22. The latest responses to the issues raised are adequate</p>
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	<p>23. The proposed activity involves the prospecting for alluvial diamonds with bulk sampling between the high-water mark and low-water mark of the sea. This section of the coast is a very sensitive environment and extreme care must be taken when conducting prospecting activities in this environment. For this reason, this Directorate would like to reiterate the following measures to prevent pollution occurring:</p> <p>23.1. The storage of hazardous substances (i.e. diesel, petrol and lubricants etc.) within or near the prospecting trenches should be prohibited and should ideally be located within the construction camp/ parking area, on an impervious surface within a bund (to accommodate 110% of the maximum allowable volume) to contain any fugitive spillages and/or leakages.</p> <p>23.2. The refuelling and/or repair of heavy earthmoving vehicles should not take place within any prospecting trenches or coastal beach environment and should be conducted over a dedicated impervious area within the construction camp/ parking area.</p> <p>23.3. In the event of a significant spill or leak of hazardous substances (petrol and diesel) during the construction or operational phase, such incident(s) must be reported to all relevant authorities, including the Directorate: Pollution and Chemicals Management in accordance with section 30(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") pertaining to the control of incidents. This clause must be written in the EMPr.</p> <p>24. It is indicated in the Draft EMPr that portable/chemical toilets must be in good working condition and cleaned daily. Please note that these ablution facilities must also be inspected regularly for signs of leaks and possible water contamination in the area.</p> <p>25. Fugitive dust emissions may be created during invasive prospecting activities. Dust generated during all phases of the proposed activity must comply with the National Dust Control Regulations (GN No. R. 827 of 1</p>	<p>23.1 This has been included in Section 17.11 of the EMPr</p> <p>23.2 This has been included in Section 17.7 of the EMPr</p> <p>23.3 This has been included in Section 17.11 of the EMPr</p> <p>24. This has been included in Section 17.16 of the EMPr</p> <p>25. This has been included in Section 17.14 of the EMPr</p>
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	<p>November 2013) promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.</p> <p>26. Dust is mentioned in the EMPr but the mitigation measures are not explicitly specified. Clearer measures to monitor and prevent fugitive dust emissions must be included in the EMPr.</p> <p>27. In the Draft EIA Report, one of the proposed mitigation measures requires that excavated material be kept wet with seawater to limit dust, and to backfill prospecting pits and bulk sampling trenches as soon as possible to limit the time that spoil heaps will remain visible. These measures are however not included in the EMPr.</p> <p>28. It is noted that dust may be generated from vehicles transversing on-site. Kindly indicate the speed limit for vehicles traversing the site in the EIA Report and the EMPr.</p> <p>29. Large vehicles transversing on-site, and excavation activities may cause significant noise. Noise generated on-site from all the proposed activities must comply with the Western Cape Noise Regulations (Provincial Notice 200/2013). Kindly include these regulations in Table 6 dealing with the policy and legislative context, for consideration and implementation.</p> <p>30. It is stated in the Draft EMPr that "Effective noise control measures must be in place and acceptable working hours must be kept (deviations must be approval by the (ECO)." Please specify the working hours in both the EIA Report and EMPr.</p> <p>31. The Directorate recommends that measures to monitor and prevent disturbing noise must be included in the EMPr.</p>	<p>26. The material to be excavated on the proposed site will be kept wet and the speed limit to be enforced on access tracks to the proposed site is 30km.</p> <p>27. Please see Section 17.14 of the EMPr</p> <p>28. 30km per hour</p> <p>29. Done.</p> <p>30. The hours are 07h00 to 18h00</p> <p>31. The caterpillars and trucks and other equipment will be maintained and provided with silencers. The remote location of the proposed site means very little likelihood exists that any significant noise will be experienced beyond the noise caused by the salt works as well</p>
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	<p>32. Potential air emissions will be in the form of dust pollution and exhaust fumes from vehicles and machinery. Measures to monitor and prevent significant atmospheric emissions must be included in the EMP.</p>	<p>as Tronox mine nearby and the constant crashing of sea waves.</p> <p>32. The air emissions that have the potential to become significant are only the dust that will generated by the prospecting with bulk sampling activities this will be kept low by keeping excavated material wet and by enforcing a speed limit of 30km/hr on access tracks leading to and from the proposed site. The exhaust fumes from the few caterpillars that will operate on the proposed site are unlikely to</p>
<p>Mari Rossouw (22/07/2024)</p>	<p>Ek het op 31 Augustus 2023 die eerste keer van die Fish by the Sea aansoek bewus geword. Ek het dieselfde dag by die destydse EAP, Mnr Klaas van Zyl, geregistreer as BCGP.</p> <p>Ek het kommentare en besware geopper en ingedien aan Mnr van Zyl op 3 Oktober 2023. Ek het sedertdien geen kommunikasie rakende hierdie aansoek van enigeeen ontvang nie.</p> <p>Op 16 Januarie 2024 het Maboee Nthejane van EnviroAfrica my meegedeel dat Fish by the Sea 'n prospekter aansoek ingedien het -</p>	<p>The previous terminated application that was being managed by Mr. van Zyl was a Basic Assessment application for alluvial diamonds prospecting, whereas the current Scoping and Environmental Impact Reporting application is for alluvial diamonds prospecting with bulk sampling on the same parcels of land. The terminated application and the current applications are independent of each other, even though some similarities between them exist.</p>



	<p>dieselfde aansoeker vir dieselfde grond - met verwysingsnommer WC50/1/1/2/10454PR. Ek is uitgenooi om as BCGP te registreer en 'n skakel van EnviroAfrica se webblad af te laai wat alle relevante dokumente bevat.</p>	
	<p>Op 9 Februarie 2024 het ek Mnr Nthejana per epos meegedeel dat die geormerkte stukkie kuslyn baie gewild is onder die plaaslike gemeenskap wat dit vir ontspannings doeleindes gebruik.</p>	<p>It is only small areas of the proposed site that will be sampled at any given time and the rest of the proposed site will remain accessible to the public. As soon as concurrent rehabilitation has been completed on each small area that was being sampled, the public will be able to again access the area on which sampling has been completed.</p> <p>It is for public safety that the sampling areas must temporarily be made inaccessible to the public.</p>
	<p>Ek het Mnr Nthejana ook meegedeel dat hierdie gemeenskap grotendeels Afrikaans sprekend is en om slegs Engelse dokumente beskikbaar te stel, problematies gaan wees. Ek het ook gevra dat die publieke deelname vergaderings verkieslik in Afrikaans gehou moet word, en dat Mnr Nthejana asseblief moet sorg vir 'n bekwame tolk. Sonder 'n tolk wat korrek kan vertaal, is daar 'n moontlikheid dat ons bekommernisse, besware en sentimente dalk verkeerd geïnterpreteer kan word.</p>	<p>This was addressed in previous correspondence to you concerning the Draft Scoping Scoping Report.</p>
	<p>Ek het verder melding gemaak dat dit nie net die plaaslike boere gemeenskap en omliggende dorpe se inwoners is wat hierdie kuslyn al vir jare lank gebruik nie, maar ook inwoners van voorheen benadeelde gemeenskappe. Vir baie is die wegbreek see toe oor Desember vakansies bekostigbaar en die enigste vakansies wat ons ooit sal hê. Hierdie gemeenskap sal wil weet wat aangaan, maar om genoegsame inligting binne die tydlyn vinnig by die gemeenskap uit te kry, moet alle striemende faktore in ag geneem word.</p>	
	<p>Baie van ons gemeenskapslede is nie rekenaar geletterd nie, en baie het nie toegang tot rekenaars en drukkers nie. Ek het Mnr Nthejana gevra om asseblief aandag hieraan te gee, plus die koste van data, sodat die hele gemeenskap betrek kan word en</p>	<p>This was addressed in responses given to you concerning the Draft scoping Report.</p>

	<p>geleentheid gegun word om konstruktief deel te neem.</p>	
	<p>Geen tot swak toegang tot drukkers en rekenaars is 'n verdere striemende faktor wat 'n rol kan speel dat hierdie gemeenskappe nie betekenisvolle bydraes kan lewer nie, al sou hulle wou. Om die groot aantal dokumente van selfone af te lees is nie 'n gewenste oplossing nie.</p>	<p>This was addressed in responses given to you concerning the Draft scoping Report.</p>
	<p>Mnr Nthejana het geantwoord dat hierdie dokumente slegs in Engels beskikbaar sal wees en dat Mnr Nthejane die vertaling self sal hanteer.</p>	<p>EnviroAfrica committed to translating to English as far as is practicable, the comments that you as an individual submit to EnviroAfrica written in Afrikaans.</p>
	<p>Lede van die gemeenskappe wat geraak word deur hierdie aansoek, soos myself, is deur Mnr Nthejane na EnviroAfrica se kantore in Helderberg, Somerset Wes genooi sodat die dokumente daar aan ons verduidelik kan word. Ek woon baie na aan die voorgestelde area, maar is steeds ongeveer 400km noord van Somerset Wes. As gevolg van finansiële implikasies en ander logistieke probleme, kon ons ongelukkig nie van die aanbod gebruik maak nie.</p>	<p>It is only you as an individual that raised this issue to EnviroAfrica and it is only you that in response was invited to visit the offices of EnviroAfrica so that the content of documentation for the application can be explained in Afrikaans for you.</p>
	<p>Mnr Nthejane het ook voorgestel dat dit ons vry staan om die dienste van 'n vertaler te bekom en self daarvoor te betaal. Van die gemeenskapslede het hierdie voorstel as arrogant ervaar.</p>	<p>The response from EnviroAfrica was that you are welcome to translate the document into Afrikaans or have the document translated at your own cost. The comment received by EnviroAfrica was made by you as an individual and the response from EnviroAfrica was given to you as an individual.</p> <p>It is noteworthy that it is not mentioned in any correspondence received from you that you have been given the mandate to represent any person or persons other than yourself when commenting on this application. It is not appropriate for you to speak on behalf of persons who have never given you the mandate to speak on their behalf.</p>
	<p>Op 16 Februarie 2024 het ek aan Mnr Nthejane genoem dat die gemeenskappe dalk nie oor die nodige fondse beskik om Somerset Wes toe te try nie, en ook nie oor voldoende fondse beskik vir 'n vertaler nie.</p>	<p>It was stated in correspondence to you on the Draft Scoping Report that <i>inter alia</i>, EnviroAfrica will consider issuing notices in both English and Afrikaans as the application progresses.</p>

	<p>Ek het egter onderneem en my onderneming so aan Mnr Nthejane deurgegee, dat sou hy 'n Afrikaanse dokument beskikbaar stel, ek op my eie onkoste kopieë daarvan sal maak en in die gemeenskap sal versprei. Ek is bewus daarvan dat hierdie die werk van die EAP is, maar omdat die gemeenskap so bekommerd is oor die ongekende aantal prospekter aansoeke in ons streek, het ek my dienste aangebied.</p>	<p>All of the landowners and occupiers of land neighbouring the proposed site, relevant State Departments and Organs of State as well as the relevant ward councillor were notified of the application in a manner that meets the requirements specified in Regulation 41 of the EIA Regulations, 2014 (as amended).</p> <p>An advertisement was placed in the newspaper. All the Interested and Affected Parties that commented in Afrikaans such as yourself were responded to in Afrikaans.</p> <p>It is not appropriate for you to speak on behalf of community members, unless you can prove that you have been given the mandate to speak on their behalf.</p>
	<p>Ek het in my epos ook beswaar aangeteken dat, indien geen Afrikaanse dokument uitgereik word nie en ons deur die Engelse dokument moet werk, ons ekstra dae benodig.</p>	<p>You requested additional time to provide additional comment on the Draft Scoping Report and EnviroAfrica agreed to grant you two days beyond the legally compliant timeframe to provide the comment.</p>
	<p>Mnr Nthejane het die kommentaar periode toe verleng tot 18 Februarie 2024. Mnr Nthejane het verduidelik dat EnviroAfrica gedruk is vir tyd om betyds in te dien, maar sal dit definitief oorweeg om toekomstige dokumente in Afrikaans ook uit te gee.</p> <p>Ek heg hierdie epos gesprek aan as Bylaag A.</p>	<p>Noted</p>
	<p>Ek het my kommentare en besware op 18 Februarie ingedien en op 19 Februarie antwoorde op my kommentare en besware ontvang.</p> <p>Ek heg die antwoorde wat Mnr Nthejane op my kommentare en besware gegee het, aan as Bylaag B.</p>	<p>Noted</p>
	<p>Op 20 Junie 2024 het Margaret Christians van EnviroAfrica my per epos genooi om kommentaar te lewer op 'n prospekter aansoek van dieselfde aansoeker vir dieselfde stukkie strand.</p>	<p>Noted</p>
	<p>Ek het weer versoek dat die gemeenskap wil deelneem aan die</p>	<p>All of the landowners and occupiers of land neighbouring the proposed</p>

	<p>aansoek, en of dokumente asseblief in Afrikaans beskikbaar gestel kan word.</p>	<p>site, relevant State Departments and Organs of State as well as the relevant ward councillor were notified of the application in a manner that meets the requirements specified in Regulation 41 of the EIA Regulations, 2014 (as amended).</p> <p>An advertisement was placed in the newspaper. All the Interested and Affected Parties that commented in Afrikaans such as yourself were responded to in Afrikaans.</p> <p>It is not appropriate for you to speak on behalf of community members, unless you can prove that you have been given the mandate to speak on their behalf.</p>
	<p>Faktore wat as striemend gesien kan word is die koste van data, die swak selfoon sein oor 'n groot deel van die area, min tot geen internet toegang in ons streek, ver grondpaaie wat afgelê moet word - alles faktore wat algemene kommunikasie - so vrylik beskikbaar waar Mnr Nthejane woon en werk - 'n geweldige uitdaging in ons streek is.</p>	
	<p>Volgens Mnr Nthejane se antwoord is daar volgens hom op al my vrae volledig genoeg geantwoord. Dit het vir my voorgekom asof Mnr Nthejane die saak as afgehandel beskou het. Ek heg hierdie epos aan as Bylaag C</p>	<p>Noted.</p>
	<p>Ek teken ten sterkste beswaar aan teen die volgende:</p> <p>Geen dokumente in Afrikaans is beskikbaar gestel nie. Mnr Nthejane se bekommernis is dat daar regs implikasies kan wees met 'n swak vertaalde dokument, dus verkies hy om dit alles slegs in Engels beskikbaar te stel.</p>	<p>It is reiterated that the report templates and other forms of the competent authority are written in English and these must therefore be completed in English. However, you are welcome to submit submit comments in Afrikaans. In addition, EnviroAfrica can consider issuing public notices on the application in English and Afrikaans.</p>
	<p>Mnr Nthejane het nie kans gesien om van 'n professionele vertaler gebruik te maak nie, wat hierdie bekommernis vir Mnr Nthejane sou uitskakel.</p>	<p>It is reiterated that it is risky to take reports and forms of the competent authority that are written in English and have also been completed in English and then have these translated to Afrikaans. The professional translator may not be sufficiently qualified regarding environmental matters and may inaccurately translate the reports</p>

		and completed forms, thereby leaving the Applicant and EnviroAfrica open to accusations of misleading Interested and Affected Parties
	Dat Mnr Nthejane van die gemeenskap verwag het om die dienste van vertalers op die gemeenskap se onkoste te bekom.'	<p>EnviroAfrica wrote to you as an individual that you are free to have the application documents translated to Afrikaans at your own cost.</p> <p>It is not appropriate for you to speak on behalf of community members, unless you can prove that you haven been given the mandate to speak on their behalf.</p>
	Mnr Nthejane het geen ag geslaan op my herhaalde versoek vir Afrikaanse dokumente nie.	<p>It is reiterated that the report templates and other forms of the competent authority are written in English and must therefore be completed in English. A professional translator may not be sufficiently qualified regarding environmental matters and may inaccurately translate the reports and completed forms, thereby leaving the Applicant and EnviroAfrica open to accusations of misleading Interested and Affected Parties that read the translated translated reports and forms.</p> <p>However, you are welcome to translate the completed application reports and forms of the competent authority from English to to Afrikaans at your own legal risk and your own cost.</p>
	Dat alle dokumentasie slegs deur 'n skakel van die internet afgelaai kon word en dat geen striemende faktor wat hierdie gemeenskap daaglik in die gesig staar, in ag geneem is nie.	<p>It is not appropriate for you to speak on behalf of community members, unless you can prove that you haven been given the mandate to speak on their behalf.</p> <p>The notices inviting Interested and Affected Parties to comment on the application were issued in a manner that meets the requirements specified in Regulation 41 of the EIA Regulations of 2014 (as amended)</p>
	Dat geen harde kopieë beskikbaar gemaak is vir die gemeenskap nie.	It is not a legal requirement that printed copies of completed reports and forms be made available.

	Mnr Nthejane my herhaalde pleidooie om striemende faktore in ag te neem, elke keer geignoreer is.	EnviroAfrica has adequately responded to all of the issues that you have raised.
	Mnr Nthejane geen konsultasie met die gemeenskap gehad het deur middel van openbare publieke vergaderings nie.	It is not a legal requirement to hold public meetings. The public participation requirements specified in Regulation 41 have been met.
	Dat Mnr Nthejane in 'n epos verduidelik het dat hy al die boksies gemerk het rakende die metodiek van hierdie aansoek, maar geen moeite gedoen het om met die gemeenskap self te konsulteer nie.	EnviroAfrica never made any mention of ticking any boxes. Instead, it was highlighted to you that the public participation requirements specified in Regulation 41 of the EIA Regulations of 2014 (as amended) have been met.
	Dat gegewe slegs 'n Engelse dokument beskikbaar gestel is, en hierdie dokument vol tegniese inligting is, Mnr Nthejane my versoeke vir publieke vergaderings met amptelike tolke nie ernstig opgeneem het nie.	It is not a legal requirement that public meetings with official interpreters be held.
	Dat Mnr Nthejane nie die gemeenskap se belange enigsens belangrik geag het nie, en geweier het om die unieke uitdagings van hierdie streek aan te spreek, om sodoende ons hele gemeenskap 'n geleentheid te gee om saam te gesels.	The public participation process conducted meets the legal requirements specified in Regulation 41 of the EIA Regulations.  It is not appropriate for you to speak on behalf of community members, unless you can prove that you haven been given the mandate to speak on their behalf.
	Dat Mnr Nthejane van die gemeenskap verwag het om op eie onkoste Somerset Wes toe te ry om daar te gaan uitvind wat aangaan	You were invited in your individual capacity to come to the EnviroAfrica and have your questions on the application answered. No mention of the community was made in the response to your comment.  It is not appropriate for you to speak on behalf of community members, unless you can prove that you haven been given the mandate to speak on their behalf.
	Dat Mnr Nthejane ons nietig laat voel het deurdat hy van ons verwag het om met vrae agter hom aan te ry.	
	Dat Mnr Nthejane moontlik 'n misleidende dokument gaan indien by DMR waarin geen bydraes van die gemeenskap vervat sal word nie, en moontlik gaan verklaar dat daar voldoende konsultasie gesprekke plaasgevind het.	The public participation process followed for the application indeed meets the legal requirements specified in Regulation 41 of the EIA Regulations.
	Dat Mnr Nthejane nie genoegsame inligting beskikbaar gestel het vir	The owners/ occupiers of the land parcels bordering the proposed site,

	<p>insae deur die gemeenskap nie, deur harde kopieë op strategiese plekke te plaas nie.</p>	<p>the relevant ward councillor and the relevant State Departments and Organs of State administering laws that affect the application have all been included in the public participation process. An advertisement was also placed in a newspaper that circulates in the area and all this is in line with the requirements specified in Regulation 41 of the EIA Regulations of 2014 (as amended)</p>
	<p>Dat Mnr Nthejane my kommentaar wat ek op 18 Februarie 2024 in Afrikaans ingedien is, self vertaal of probeer vertaal het, en antwoorde in Engels verskaf het, antwoorde wat myns insiens nie voldoende my vrae beantwoord het nie.</p>	<p>The comments that you made in Afrikaans were adequately responded to in the English language. Please bear in mind that English, together with Afrikaans and isiXhosa are official languages in the Western Cape Province.</p>
	<p>Deur onvoldoende antwoorde te verskaf, is 'n bewys dat Mnr Nthejane eerder die dienste van 'n tolk moes bekom het om seker te maak alle BCGPs se kommentare word korrek vertaal, korrek verstaan en korrek beantwoord sodat geen sentiment verlore gaan nie.</p>	<p>The comments that you made in Afrikaans were adequately responded to in the English language. Please bear in mind that English, together with Afrikaans and IsiXhosa are official languages in the Western Cape Province.</p>
	<p>Kommentaar op die Terrestrial Biodiversity Report:</p> <p>Die skrywer van die Terrestrial Biodiversity Report het, na slegs 'n besoek van twee dae gedurende Junie 2024, sy opinie gelug dat die bewaringstatus van hierdie kuslyn te hoog geskat is - dit behoort van "Highly Sensitive" na "Medium" verlaag word. Die skrywer erken dat spesies met bewaringstatus in die gebied mag voorkom, maar die skrywer het nie veel / niks gesien nie.</p> <p>Die skrywer erken dat alle voëls wat op die strand gewaar is, plus dié wat nie gesien is nie, negatief beïnvloed gaan word deur die prospektering. Die skrywer erken dat hierdie spesies se habitate alreeds negatief beïnvloed is deur mynbou, maar stel voor dat die aansoeker die duine moet vermy en sover moontlik uit die natuurlike veld bly, dan behoort daar nie 'n probleem</p>	<p>The author of the terrestrial biodiversity study report is a qualified, experienced and accredited biodiversity specialist and none of the State Departments and Organs of State administering laws that are relevant to the application have expressed dissatisfaction with the terrestrial biodiversity report.</p>

	<p>te wees nie.</p> <p>Ek teken beswaar aan teen hierdie denkwyse. Dit is myns insiens onverantwoordelik om so 'n stelling aan 'n aansoeker te maak, en sodoende die werklike impak wat hierdie prospekteer aansoek op die kuslyn gaan hê, daardeur te ondermyn.</p>	
	<p>Ek teken beswaar aan dat daar nie 'n amfibiese spesialis aangestel word om die woestyn reënpadda (<i>Breviceps spp.</i>) ordentlik te ondersoek nie. Hierdie spesie is deur jare hewig geraak deur spesifiek diamant mynbou aktiwiteite langs die Weskus en kan in die nabye toekoms moontlik uitsterf (Fieldguide to Frogs of Southern Africa, 3rd edition, 201C). Prospektering wat die spesie se habitat verder kan vernietig, is onverantwoordelik. Die skrywer skryf dat verdere habitats verlies nie voorspel word nie. Waarop word die voorspelling gebasseer? Gegewe die aantal mynbou en prospekteer aansoeke in die area, stel asseblief 'n amfibiese spesialis aan.</p>	<p>The author of the terrestrial biodiversity study report is a qualified, experienced and accredited biodiversity specialist and none of the State Departments and Organs of State administering laws that are relevant to the application have expressed dissatisfaction with the terrestrial biodiversity report.</p>
	<p>Dat 'n miskruier spesialis nie aangestel is om die effek van gefragmenteerde habitate as gevolg van mynbou op miskruiers, te ondersoek nie. My motivering is dat die geormerkte prospekteer area omring word deur bestaande myne en ander prospekteer aansoeke, en hierdie area kan dalk een van die laaste gebiede wees wat as ekologiese eenheid dien vir miskruiers in die streek.</p>	<p>The author of the terrestrial biodiversity study report is a qualified, experienced and accredited biodiversity specialist and none of the State Departments and Organs of State administering laws that are relevant to the application have expressed dissatisfaction with the content of the terrestrial biodiversity report.</p>
	<p>Dat 'n skoenlapper spesialis nie betrek is nie, veral met verwysing na die volgende spesies:</p> <p><i>Chrysoritis zonarius</i>, <i>Chrysoritis thysbe</i> en <i>Chrysoritis perseus</i>.</p>	<p>The author of the terrestrial biodiversity report is a qualified, experienced and accredited biodiversity specialist and none of the State Departments and Organs of State administering laws that are relevant to the application have expressed dissatisfaction with the content of the terrestrial biodiversity report.</p>
	<p>Die skrywer maak melding dat die prospektering waarskynlik nie 'n impak op die skoenlappers gaan hê</p>	<p>It is more scientifically sound to describe potential impacts and risks in terms of likelihood levels such as</p>



	<p>nie. Dit sal beter wees as die waarskynlikheid vervang word met geen impak op die beperkte omgewing waarin hierdie endemiese spesies broei.</p>	<p>improbable, unlikely or highly likely etc. Rather than to use absolute terms such as “no impact”.</p>
	<p>Dat die geormerkte prospekter gebied woonplek is van die swart tobie (<i>Haematopus moquini</i>), 'n voël met 'n hoë bewaringstatus, aldus die skrywer. Hierdie voël kan tot 35 jaar oud word en tot 25 jaar lank met een maat paar. Neste gaan hewig geraak word deur hierdie prospekter aansoek, en geen spesialis studie is nodig om dit te bevestig nie. <i>Haematopus moquini</i> is verskeie kere deur myself op hierdie strand gefotografeer, wat dui op 'n gesonde bevolking wat tot niet sal gaan as hierdie prospekter aansoek toegestaan word. <i>Haematopus moquini</i> bly feitlik lewenslank in een area, en hierdie strande is duidelik vir hulle 'n veilige habitat.</p>	<p>The author of the terrestrial biodiversity study report is a qualified, experienced and accredited biodiversity specialist and none of the State Departments and Organs of State administering laws that are relevant to the application have expressed dissatisfaction with the content of the terrestrial biodiversity report.</p>
	<p>Ek het die aanwesigheid van positief geïdentifiseerde <i>Circus maurus</i> neste in die omgewing onder Mnr Nthejane se aandag gebring in 'n vorige skrywe. Die skrywer van hierdie verslag reken dat die omgewing ideaal vir <i>Circus maurus</i> neste kan wees, maar dat die skrywer twyfel of die prospekter die <i>Circus maurus</i> negatief sal beïnvloed. Verduidelik asseblief</p> <p>hoekom die skrywer so seker is dat die <i>Circus maurus</i> nie negatief beïnvloed gaan word nie? Let asseblief daarop dat daar 'n 5km radius rondom 'n <i>Circus maurus</i> nes is. Hierdie protokol geld nie net vir windplase nie, maar ook vir bulk sampling.</p>	<p>The author of the terrestrial biodiversity study report is a qualified, experienced and accredited biodiversity specialist and none of the State Departments and Organs of State administering laws that are relevant to the application have expressed dissatisfaction with the content of the terrestrial biodiversity study report.</p>
	<p>Figuur 9 op bladsy 13 se foto is heel waarskynlik net suid van die Soutrivier mond geneem. Hierdie foto kan dalk die verkeerde indruk skep dat die hele prospekter area se strande so lyk. Neem asseblief kennis dat rotse baie van die geormerkte strande van mekaar skei, en dat die aansoeker, by gebrek van enige toegangspad, deur die natuurlike omgewing moet beweeg om van een strand tot by 'n volgende te kom. Hierdie pad sal</p>	<p>The proposed site will be accessed using existing routes that connect to the public road that Tronox has upgraded for the purpose of accessing the seawater intake of Tronox. The access routes have been made by informal campers and kelp collectors and ordinary members of the public wishing to access the sea.</p>

<p>deeglik vasglê word met al die diamantdraende materiaal wat heen en weer vervoer moet word. Dus is dit bietjie van 'n bespotting om te skryf dat duine as "no-go" areas hanteer moet word om die lang lys spesies met bewaringstatus te beskerm. Meer nuwe paaie gaan neergelê moet word as wat weergegee word en die voetspoor van hierdie aansoek gaan veel groter wees.</p>	<p>The access routes are indicated in Figure 4 of the Draft EIR and these access routes can be used by the Applicant without any upgrades required.</p>
<p>Om deur die natuurlike veld oor duine te beweeg van een strand na 'n ander, sonder enige definitiewe grense wat deur die spesialis neergelê en volledig beskryf is as "no-go" areas, kan die aansoeker geen verantwoordelike besluit neem waar om deur die natuurlike veld te ry en waar nie. Sonder definitiewe riglyne sal die aansoeker nie weet watter voëlne en plantspesies vermy moet word nie. Ek kan nie sien hoe effektief die duine as "no-go" areas deur die aansoeker toegepas moet word nie, want waarop word opleiding aan kontrakteurs gebaseer?</p>	<p>Access to and from the proposed site will only be gained via the access tracks that have been created by <i>inter alia</i>, informal campers and kelp collectors etc. This will be emphasised in the environmental training to be given to the employees, contractors and sub-contractors of the Applicant.</p>
<p>Die skrywer het nagelaat om die bedreigde <i>Phoeniconaias minor</i> (NT) en die <i>Phoenicopterus roseus</i> (NT), waarvan klein getalle van albei spesies slegs 500 meter noord van die prospekter area in die Soutrivier mond broei en woon, in berekening te bring met die moontlike impak wat prospektering, veral die geraasvlakke, op hulle sal hê.</p>	<p>The location of the northernmost prospecting and bulk sampling trench is more than 1km away from the mouth of the Salt River.</p>
<p>In my opinie is hierdie verslag wat ingedien is, nie volledig en voldoende genoeg nie.</p>	
<p>'n Mynaansoek volg gewoonlik op 'n prospekter aansoek. Die skade wat mynbou tot dusver aan die Weskus aangerig het, is hartverskeurend. Daar is geen ander woord om dit te beskryf nie. Min tot geen rehabilitasie grens aan kriminaliteit en swak gereguleerde myne dra by tot die probleem, ten spyte van wetgewing.</p> <p>Die afwesigheid van 'n SEA (Strategic Environmental Assessment) vir hierdie streek beteken die werklike impak wat al oor jare aan die opbou is, kon tot</p>	<p>It is unknown whether or not the competent authority will issue an environmental authorisation for the prospecting with bulk sampling application and it is also unknown whether or not the proposed prospecting with bulk sampling will yield results that indicate that a viable mine can be established on the proposed site.</p> <p>Should the proposed prospecting with bulk sampling be granted environmental authorisation, the</p>

	<p>dusver nie bepaal word nie, en ek is bevrees die skade langs die Weskus gaan onomkeerbaar wees sonder 'n volledige impakstudie.</p> <p>Dus 'n verdere motivering vir my versoek van meer spesialis studies.</p>	<p>Applicant will be required to adhere the conditions of environmental authorisation and these conditions include adequate rehabilitation as indicated in the Rehabilitation and Closure Plan. Should you be of the view that the rehabilitation done is inadequate, you may take this up with the relevant authorities.</p> <p>It is unknown whether or not the Applicant would take interest in pursuing an application to mine diamond on the proposed site and it is unknown whether or not the competent authority would authorise the application. It is relevant at this point in time to discuss only the proposed prospecting with bulk sampling application and not any other application that might or might not be considered and might or might not be authorised in the future.</p> <p>A Strategic Environmental Assessment ("SEA") for the West Coast would indeed be ideal. However, the SEA does not exist at this point in time and it is beyond the Applicant and the appointed EAP to do the SEA.</p>
	<p>Hierdie prospekter aansoek sal volgens die enkele spesialis en EAP min tot geen impak hê, maar kyk na die volgende foto van 'n myn direk suid van die prospekter area, wat jare gelede ook begin het met beloftes van min tot geen impak. Die prospektering kon dalk 'n klein impak gehad het, maar die daaropvolgende myn het die profiel van die kuslyn vir altyd verander.</p>	<p>It is unknown whether or not the competent authority will issue an environmental authorisation for the prospecting with bulk sampling application and it is also unknown whether or not the proposed prospecting with bulk sampling will yield results that indicate that a viable mine can be established on the proposed site.</p> <p>Should the proposed prospecting with bulk sampling be granted environmental authorisation, the Applicant will be required to adhere to the conditions of environmental authorisation and these conditions include adequate rehabilitation as indicated in the Rehabilitation and Closure Plan. Should you be of the view that the rehabilitation done is inadequate, you should take the matter up early with the relevant authorities so that the situation can</p>

		<p>be corrected.</p> <p>The damage caused by the previous mine that you have mentioned is not in any way an indication of what will happen with this application.</p>
	<p>Die duine is weg en is vervang deur kranse. Hierdie myn dra, saam met nog baie ander, by tot die algehele verandering aan die Weskus se profiel. Op die foto lyk dit of een veldtipe heeltemal deur die myn vernietig is.</p>	<p>The damage caused by the previous mine that you have mentioned is not in any way an indication of what will happen with this application.</p>
	<p>Ek vertrou dat my kommentare na behore en duidelik vertaal sal word. Ek behou die reg om nog kommentaar en griewe te lug soos nuwe inligting beskikbaar word.</p>	<p>Your comments are noted and have been translated accurately and responded to adequately.</p>
	<p>Sou ek enige inligting in enige dokument verkeerd verstaan het, moet ek dit ongelukkig toeskryf aan die absolute smart waardeur ek is om deur Engelse dokumente te werk. Ek vra verskoning as die EAP een ding bedoel het en ek iets anders begryp het, dit was nie die bedoeling nie.</p>	<p>English is an official language in the Western Cape Province, together with Afrikaans and IsiXhosa.</p>
<p>Ninja Jochum (16/07/2024)</p>	<p>Hi my name is Ninja Jochum</p> <p>Contacting you in regards to - Environmental Impact Report (EIR) and Environmental Management Programme Report</p> <p>Contact details : <a href="mailto:nina.jochum@gmail.com">nina.jochum@gmail.com</a> <a href="mailto:mark.social.swellendam@gmail.com">mark.social.swellendam@gmail.com</a></p> <p>Comments - Stop this Application! Our Endemic Nature is not for sale!</p> <p>+</p> <p>Appendix -13-EMPr1 Page 6: in EMPr for Construction &amp; Operation – The proposed site overlaps a marine and <u>Critical Endangered</u> Namaqualand Biodiversity Area.</p> <p>Multiple species, Critically endangered.</p> <p>Page 23: in EMPr for Construction &amp; Operation</p>	<p>Noted</p> <p>The Applicant has the right to pursue the application and the proposed site will be rehabilitated in keeping with the Rehabilitation and Closure Plan.</p> <p>The proposed site does overlap some Critical Biodiversity Areas. However, no vegetation will be cleared, as the proposed prospecting with bulk sampling will be largely limited to between the high-water and the low-water mark of the sea. All areas on which structures will be placed above the high-water mark of the sea are will be areas previously cleared of</p>

<p>Section 17.15 :Solid Waste Management No on-site burying or dumping of any waste materials, vegetation, litter or refuse must occur.</p> <p>+</p> <p>Appendix 7 - Impact Scoring Negative Impact - marked a 10 (because an 11 would make it HIGHLY sensitive)</p> <p>Before and during Mitigation: Topographic NEGATIVE impact caused by neglected spoil heaps. HIGH Pollution through littering and from inappropriate disposal of sewage. HIGH Veld fire risk: Potential risk of veld fires. Creation of a few short-term employment opportunities</p> <p>After Mitigation? Still Negative 10 Obstruction of public access to coast. (because it is now destroyed) NEGATIVE Impact on nearshore marine biodiversity ( obviously ) Visual disturbance to onlookers (because it is now a mine!) It's not beautiful a mine, especially when beforehand it was a pristine environment. Shame.</p> <p>+</p> <p>EIR-EMPr-Template Page 5 Operational Phase Activities - Overburden dumps Potential Impact - Terrestrial biodiversity disturbance/loss from on-site prospecting with bulk sampling activities and from vehicles. Disturbance/Death of onsite wildlife and vegetation from removal of existing vegetation and from sampling areas and service roads. Damage to coastal dune system etc... Aspects affected - Terrestrial biodiversity (Endemic/Indigenous) Significance (before mitigation) HIGH Proposed mitigation - Keep development footprint between the low and the high-water mark of the sea and on patches that are devoid of Indigenous vegetation and</p>	<p>indigenous vegetation by <i>inter alia</i>, informal campers and kelp collectors. The existing off-road tracks for gaining access to and from the proposed site will be kept to without upgrades and so very little impact on indigenous vegetation is likely.</p> <p>The potential negative environmental impacts have almost all been assessed as medium to low by the EAP and the appointed specialist scientists after impact mitigation measures are implemented.</p> <p>The meaning of what you have written is unclear.</p>
---	---





**Maboee**

---

**From:** Margaret | Enviro Africa <info@enviroafrica.co.za>  
**Sent:** Friday, 21 June 2024 07:48  
**To:** 'Mari Rossouw'  
**Cc:** 'Maboee'  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good morning. Ms Rossouw

I acknowledge receipt of your email and content noted. Maboee please see email below and revert to Ms Rossouw.

Kind regards

**Margaret Christians**



**EnviroAfrica cc**  
**p:** +27 21 851 1616  
**f:** +27 86 512 0154  
**a:** Unit 7, Pastorie Park, Reitz St, Somerset West, 7130  
**w:** [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

**BE 100% GREEN, READ FROM THE SCREEN**



**From:** Mari Rossouw <admin@rosbe.co.za>  
**Sent:** Thursday, June 20, 2024 6:00 PM  
**To:** Margaret | Enviro Africa <info@enviroafrica.co.za>  
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Mari Rossouw

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**From:** Margaret | Enviro Africa <info@enviroafrica.co.za>  
**Date:** Thursday, 20 June 2024 at 13:26  
**To:** 'Maboeë' <maboeë@enviroafrica.co.za>  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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Kind regards,

Margaret Christians



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## Maboee

---

**From:** Sindiswa Dlomo <SDLOMO@dffe.gov.za>  
**Sent:** Friday, 21 June 2024 09:16  
**To:** Margaret | Enviro Africa; 'Maboee'; Abongile Nggongwa  
**Cc:** callcentre  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good morning, Ms Christians.

This serves to confirm receipt of email correspondence.

Regards,  
Ms. Sindiswa (Sindi) Dlomo  
**EAPASA Registration: 2022/5730**  
Designation: Deputy Director: National Infrastructure Projects  
Chief Directorate: Integrated Environmental Authorisations  
Department of Forestry, Fisheries, and the Environment  
Tel: 012 399 9390  
Cell: 076 940 5716  
Email: [SDLomo@environment.gov.za](mailto:SDLomo@environment.gov.za)

---

**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Sent:** Thursday, June 20, 2024 1:27 PM  
**To:** 'Maboee' <[maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za)>  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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**From:** Sindiswa Dlomo <SDLOMO@dfe.gov.za>  
**Sent:** Friday, 21 June 2024 09:17  
**To:** Margaret | Enviro Africa; 'Maboee'  
**Cc:** callcentre  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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Regards,  
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**EAPASA Registration: 2022/5730**  
Designation: Deputy Director: National Infrastructure Projects  
Chief Directorate: Integrated Environmental Authorisations  
Department of Forestry, Fisheries, and the Environment  
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**Maboee**

**From:** Maboee <maboee@enviroafrica.co.za>  
**Sent:** Friday, 21 June 2024 09:24  
**To:** 'Margaret | Enviro Africa'; 'Mari Rossouw'  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good morning M. Rossouw,

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Kind regards,

**Maboee Nthejane**



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p: +27 21 851 1616 m: 084 037 2477  
f: +27 86 512 0154  
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w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)



**From:** Margaret | Enviro Africa <info@enviroafrica.co.za>  
**Sent:** Friday, June 21, 2024 7:48 AM  
**To:** 'Mari Rossouw' <admin@rosbe.co.za>  
**Cc:** 'Maboee' <maboee@enviroafrica.co.za>  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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**From:** Mari Rossouw <[admin@rosbe.co.za](mailto:admin@rosbe.co.za)>  
**Sent:** Thursday, June 20, 2024 6:00 PM  
**To:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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I would also like to bring to your attention that Afrikaans is the preferred language in the region, and I urge you to make the relevant documents available in Afrikaans. I further urge you to make hard copies of all documents related to this application available at strategic locations in the community.

Kind regards  
Mari Rossouw

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**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Date:** Thursday, 20 June 2024 at 13:26  
**To:** 'Maboeë' <[maboeë@enviroafrica.co.za](mailto:maboeë@enviroafrica.co.za)>  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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Kind regards,

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---

**Maboee**

**From:** Mari Rossouw <admin@rosbe.co.za>  
**Sent:** Monday, 24 June 2024 10:39  
**To:** Maboee  
**Cc:** Margaret | Enviro Africa  
**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good morning Mr Nthejane

I acknowledge your email, thank you!

I feel that none of the questions I have asked in my previous email dated 20 June, has been answered.

Please be so kind and provide answers to them, if possible.

Thank you!

Kind regards  
Mari Rossouw

---

**From:** Maboee <maboee@enviroafrica.co.za>  
**Date:** Friday, 21 June 2024 at 09:23  
**To:** 'Margaret | Enviro Africa' <info@enviroafrica.co.za>, 'Mari Rossouw' <admin@rosbe.co.za>  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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**Sent:** Friday, June 21, 2024 7:48 AM

**To:** 'Mari Rossouw' <[admin@rosbe.co.za](mailto:admin@rosbe.co.za)>

**Cc:** 'Maboee' <[maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za)>

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**From:** Mari Rossouw <[admin@rosbe.co.za](mailto:admin@rosbe.co.za)>

**Sent:** Thursday, June 20, 2024 6:00 PM

**To:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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Mari Rossouw

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**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Date:** Thursday, 20 June 2024 at 13:26

**To:** 'Maboeë' <[maboeë@enviroafrica.co.za](mailto:maboeë@enviroafrica.co.za)>

**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

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Margaret Christians



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---

**Maboee**

**From:** Mari Rossouw <admin@rosbe.co.za>  
**Sent:** Monday, 01 July 2024 13:40  
**To:** Maboee  
**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good afternoon

I am following up on my questions from email send on 20 June 2024.

I feel that none of my questions were answered.

I would appreciate a reply.

Kind regards  
Mari Rossouw

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**From:** Maboee <maboee@enviroafrica.co.za>  
**Date:** Friday, 21 June 2024 at 09:23  
**To:** 'Margaret | Enviro Africa' <info@enviroafrica.co.za>, 'Mari Rossouw' <admin@rosbe.co.za>  
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**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Sent:** Friday, June 21, 2024 7:48 AM

**To:** 'Mari Rossouw' <[admin@rosbe.co.za](mailto:admin@rosbe.co.za)>

**Cc:** 'Maboee' <[maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za)>

**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good morning. Ms Rossouw

I acknowledge receipt of your email and content noted. Maboee please see email below and revert to Ms Rossouw.

Kind regards

Margaret Christians



**EnviroAfrica cc**

p: +27 21 851 1616

f: +27 86 512 0154

a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130

P.O. Box 5367, Helderberg, 7135

w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

**BE 100% GREEN, READ FROM THE SCREEN**

**From:** Mari Rossouw <[admin@rosbe.co.za](mailto:admin@rosbe.co.za)>

**Sent:** Thursday, June 20, 2024 6:00 PM

**To:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good afternoon

I acknowledge receipt of the email.

I provided comments on the dBAR document and submitted on 19 February 2023, and to date have not received any feedback.

I am not sure if the fBAR has been submitted or where in the process this application from Fish by the Sea currently stands. Could you please provide more clarity regarding this?

I would also like to bring to your attention that the community affected by this application faces several factors that can influence public participation.

This stretch of coastline is a popular camping site among all income groups in the community, and the cost of data can be problematic. Searching for documents on your website can cause further issues since not everyone is computer literate. Poor network and cell phone reception add to the challenges. Not everyone has access to computer services to download this document.

I would also like to bring to your attention that Afrikaans is the preferred language in the region, and I urge you to make the relevant documents available in Afrikaans. I further urge you to make hard copies of all documents related to this application available at strategic locations in the community.

Kind regards  
Mari Rossouw

---

**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Date:** Thursday, 20 June 2024 at 13:26

**To:** 'Maboeë' <[maboeë@enviroafrica.co.za](mailto:maboeë@enviroafrica.co.za)>

**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals ("DMR").

The Draft Environmental Impact Report and associated appendices for the application for environmental authorisation are available for public comment from 20 June 2024 to 22 July 2024.

Interested and Affected Parties can access the Draft Scoping Report and associated appendices by clicking on the following internet link <https://we.tl/t-6RiF2MbnSs>, as well as by visiting the website of EnviroAfrica i.e., [enviroafrica.co.za/projects/for-public-participation/](http://enviroafrica.co.za/projects/for-public-participation/) and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".

Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboeë@enviroafrica.co.za](mailto:maboeë@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

Margaret Christians



**EnviroAfrica**

Environmental Management and Impact Assessment  
Omgewingsbestuur en Impakbeoordeling



**EnviroAfrica cc**

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**BE 100% GREEN, READ FROM THE SCREEN**

## **Maboee**

---

**From:** Miles Masterson <miles@protectthewestcoast.org>  
**Sent:** Tuesday, 02 July 2024 11:31  
**To:** Margaret | Enviro Africa; Maboee  
**Cc:** Patrick Forbes; Tashreeq Dollie; Mike Schliebach  
**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good day

Kindly note that it seems that the Wettransfer link to download documentation for this application has expired.

Please kindly advise as Protect the West Coast will be publicising this application on our website shortly.

Many thanks

Miles

On Thu, Jun 20, 2024 at 1:31 PM Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)> wrote:

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals ("DMR").

The Draft Environmental Impact Report and associated appendices for the application for environmental authorisation are available for public comment from 20 June 2024 to 22 July 2024.

Interested and Affected Parties can access the Draft Scoping Report and associated appendices by clicking on the following internet link <https://we.tl/t-6RIF2MbnSs>

, as well as by visiting the website of EnviroAfrica i.e., [enviroafrica.co.za/projects/for-public-participation/](http://enviroafrica.co.za/projects/for-public-participation/) and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".

Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboe@enviroafrica.co.za](mailto:maboe@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

**Margaret Christians**



**EnviroAfrica cc**

p: +27 21 851 1616

f: +27 86 512 0154

a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130  
P.O. Box 5367, Helderberg, 7135



w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

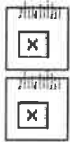
**BE 100% GREEN, READ FROM THE SCREEN**

**Protect The West Coast**

**Miles Masterson  
Communications and Fundraising Manager**

E: [miles@protectthewestcoast.org](mailto:miles@protectthewestcoast.org)

W: <https://www.protectthewestcoast.org/>



## Maboee

---

**From:** Maboee <maboee@enviroafrica.co.za>  
**Sent:** Wednesday, 03 July 2024 14:56  
**To:** 'Miles Masterson'  
**Cc:** 'patrick@protectthewestcoast.org'; 'tashreeq@protectthewestcoast.org'; 'mike@protectthewestcoast.org'; 'Margaret | Enviro Africa'  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good day M. Materson,

Please find a newly generated We Transfer link <https://we.tl/t-rhWPTjmPhT> for accessing the Draft Environmental Impact Report and associated appendices. The Draft Environmental Impact Report and associated appendices can also be accessed by clicking on the website of EnviroAfrica, *i.e.*, [enviroafrica.co.za/projects/for-public-participation/](http://enviroafrica.co.za/projects/for-public-participation/) and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".

The new We Transfer link will expire in approximately one week from today.

Kind regards,

**Maboee Nthejane**



EnviroAfrica cc  
p: +27 21 851 1616 m: 084 037 2477  
f: +27 86 512 0154  
a: Unit 7, Pastorie Park, Reitz St, Somerset West 7130  
P. O. Box 5367, Helderberg 7135  
w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

**From:** Miles Masterson <miles@protectthewestcoast.org>

**Sent:** Tuesday, July 2, 2024 11:31 AM

**To:** Margaret | Enviro Africa <info@enviroafrica.co.za>; Maboeë <maboeë@enviroafrica.co.za>

**Cc:** Patrick Forbes <patrick@protectthewestcoast.org>; Tashreeq Dollie <tashreeq@protectthewestcoast.org>; Mike Schlebach <mike@protectthewestcoast.org>

**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good day

Kindly note that it seems that the Wettransfer link to download documentation for this application has expired.

Please kindly advise as Protect the West Coast will be publicising this application on our website shortly.

Many thanks

Miles

On Thu, Jun 20, 2024 at 1:31 PM Margaret | Enviro Africa <info@enviroafrica.co.za> wrote:

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals ("DMR").

The Draft Environmental Impact Report and associated appendices for the application for environmental authorisation are available for public comment from 20 June 2024 to 22 July 2024.

Interested and Affected Parties can access the Draft Scoping Report and associated appendices by clicking on the following internet link <https://we.tl/t-6RiF2MbnSs>

, as well as by visiting the website of EnviroAfrica i.e., [enviroafrica.co.za/projects/for-public-participation/](http://enviroafrica.co.za/projects/for-public-participation/) and clicking on the heading “Projects” and thereafter clicking on the sub-heading “Public Participation”.

Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

**Margaret Christians**



**EnviroAfrica cc**  
P: +27 21 851 1616  
f: +27 86 512 0154

a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130  
P.O. Box 5367, Helderberg, 7135  
w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

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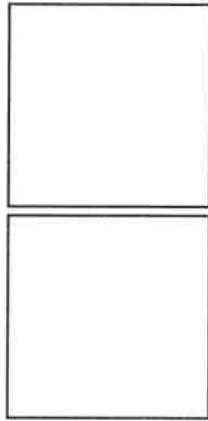
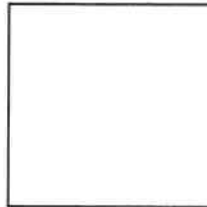
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**Protect The West Coast**

**Miles Masterson  
Communications and Fundraising Manager**

E: [miles@protectthewestcoast.org](mailto:miles@protectthewestcoast.org)

W: <https://www.protectthewestcoast.org/>



## Maboee

---

**From:** Mari Rossouw <admin@rosbe.co.za>  
**Sent:** Tuesday, 16 July 2024 11:03  
**To:** Maboee; Margaret | Enviro Africa  
**Subject:** Re: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good morning Maboee

Thank you for your answer.

I am still unsure about the answers of questions I need answering as per my email of 20 June 2024.

I provided comments on the dBAR document and submitted on 19 February 2023, and to date have not received any feedback.

I am not sure if the fBAR has been submitted or where in the process this application from Fish by the Sea currently stands. Could you please provide more clarity regarding this?

I would also like to bring to your attention that the community affected by this application faces several factors that can influence public participation.

This stretch of coastline is a popular camping site among all income groups in the community, and the cost of data can be problematic. Searching for documents on your website can cause further issues since not everyone is computer literate. Poor network and cell phone reception add to the challenges. Not everyone has access to computer services to download this document.

I would also like to bring to your attention that Afrikaans is the preferred language in the region, and I urge you to make the relevant documents available in Afrikaans. I further urge you to make hard copies of all documents related to this application available at strategic locations in the community.

Please answer at your earliest convenience.

Kind regards

Mari Rossouw

## Maboee

---

**From:** Mari Rossouw <admin@rosbe.co.za>  
**Sent:** Monday, 22 July 2024 19:26  
**To:** Maboee  
**Cc:** Margaret | Enviro Africa  
**Subject:** WC50/1/2/2/10454 PR Fish by the Sea  
**Attachments:** RE: WC50/1/1/2/10454 PR (392 KB); Bylaag B Reply to M Rossouw.docx; RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai app... (846 KB); WC50\_1\_1\_2\_454 FbtS 22 Julie 2024.pdf

Goeie middag Mnr Nthejane & Margaret

Aangeheg my bydrae met betrekking tot die bogenoemde prospekteeer aansoek.

Ek heg ook 'n Bylaag A, Bylaag B en Bylaag C aan ter ondersteuning van my besware.

Sal u asseblief ontvangs erken van my epos.

Vriendelike groete  
Mari Rossouw



**References:**

- 16/3/3/6/4/1/2/F3/10/3005/24 (Development Management)
- 18/2/3/2024-2025 (Development Facilitation)
- 17/1/8 (CMU 015/ 2024) (Biodiversity and Coastal Management)
- 19/3/2/4/F3/11/DDF085/23 (Pollution and Chemicals Management)
- 19/2/5/3/F3/13/WL0013/24 (Waste Management)
- 19/4/4/1/BM1\_Fish by the Sea (Pty) Ltd, Vanrhynsdorp (Air Quality Management)

**Attention:** Mr Bernard de Witt

EnviroAfrica cc

P. O. Box 5367

**HELDERBERG**

7135

[bernard@enviroafrica.co.za](mailto:bernard@enviroafrica.co.za)

Dear Sir

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR A PROSPECTING RIGHT BETWEEN THE HIGH-WATER AND LOW-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, NUWERUS (DMR REF: (WC) 30/5/1/1/3/2/1 (10454) PR)**

1. The Draft Scoping Report ("DSR") dated 15 January 2024, the Department's comments thereto dated 16 February 2024 and received by the environmental assessment practitioner ("EAP") on 18 February 2024, and the email notification of 20 June 2024 regarding the availability of the Draft Environmental Impact Assessment ("EIA") Report, refer.
2. The Department recommends that a Revised EIA Report and Environmental Management Programme ("EMPr") be made available to registered interested and affected parties ("I&APs") per regulation 23(2) of the EIA Regulations, 2014 (as amended).
3. The Department has reviewed the Comments and Response Report ("C&RR") that formed part of the Public Participation Report (Appendix 5), which contains the EAP's response to our comments on the DSR. It is noted that not all the comments have been adequately captured by the EAP and therefore not adequately addressed in the C&RR. Notwithstanding, please find comments from various

[www.westerncape.gov.za](http://www.westerncape.gov.za)

Department of Environmental Affairs and Development Planning  
Cape Town Office: Utilitas Building, 1 Dorp Street Cape Town, 8001  
George Office: York Park Building, 93 York Street, George, 6529





directorates within the Department on the Draft EIA Report dated 18 May 2024 and accompanying documents/annexures that were available for download from online platforms.

Directorate: Development Management (Region 1) – Mr Themba Silinda (Email: [Themba.Silinda@westerncape.gov.za](mailto:Themba.Silinda@westerncape.gov.za); Tel.: (021) 483 8367):

4. This Directorate's comments on the DSR requested confirmation regarding the suitability and lawfulness of the existing access routes for the use of machinery during invasive prospecting activities. The EAP's response is indicated as "noted" as this Directorate's comment was not accurately captured in the C&RR.
5. Per our previous comments on the DSR, the Screening Tool Report generated on 15 January 2024 identified a low sensitivity for the defence and civil aviation themes. The EAP has disputed these ratings and indicated that the sensitivity ratings should be negligible. Please be advised that the sensitivity ratings as identified by the screening tool should be confirmed as:
  - 5.1. The *Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Section 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for Environmental Authorisation* ("the Protocols") published in Government Gazette<sup>1</sup>, do not make provision for negligible ratings.
  - 5.2. The Procedures do not require any specialist assessment where the rating is of low sensitivity for the defence or civil aviation themes.

Directorate: Development Facilitation – Ms Adri La Meyer (Email: [Adri.LaMeyer@westerncape.gov.za](mailto:Adri.LaMeyer@westerncape.gov.za); Tel.: (021) 483 2887):

6. The EAP has disputed the very high sensitivity for the aquatic biodiversity theme as the proposed prospecting and bulk sampling will be set back at least 600m back from the wetlands of the Sout River. This Directorate acknowledges that although the Department of Water and Sanitation ("DWS") was consulted during the scoping phase, no comments were received from the DWS on the DSR. To ensure compliance with the Protocol for the specialist assessment and impacts on aquatic biodiversity (GN No. 320 of 20 March 2020), please consult [ndobenin2@dws.gov.za](mailto:ndobenin2@dws.gov.za) from the DWS to confirm that no Aquatic Biodiversity Compliance Statement is required.
7. Table 3 of the Draft EIA Report indicates that the waste management activity listed in Category A3(15) of GN No. 921 of 29 November 2013 (as amended) is being applied for. This Directorate's comments on the DSR requested that the specified activity must be confirmed, with the Draft EIA Report to report on certain requirements of the Regulations Regarding the Planning and Management of Residue Stockpiles and Residue Deposits from a Prospecting, Mining, Exploration or Production Operation published in GN No. R. 632 of 24 July 2015. The C&RR indicates the EAP's response as "noted". Please confirm the applicability of the specified activity as:
  - 7.1. The Draft EIA Report is silent on the requirements of the Regulations Regarding the Planning and Management of Residue Stockpiles and Residue Deposits from a Prospecting, Mining, Exploration or Production Operation.

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<sup>1</sup> Government Notice ("GN") No. 320 of 20 March 2020 in Government Gazette No. 43110, which came into effect on 09 May 2020, and GN No. 1150 of 30 October 2020 in Government Gazette No. 43855, which came into effect on 30 October 2020.

- 7.2. Throughout the Draft EIA Report it is indicated that "No Tailings and Fine residue (slimes) dumps will be created."
- 7.3. The C&RR indicates that a prospecting trench "will remain open for a maximum of 2 days". Since only one trench will be operational at a time and 4 trenches are proposed, equating a maximum operation of 8 days, it is questioned if the specified activity and the Regulations are indeed applicable to this application. It is recommended that the EAP consult with the competent authority to confirm whether the proposed 5m high berm around the trench would be regarded as a residue stockpile.
8. It is noted that less than 80m<sup>3</sup> of fuel for equipment will be stored in the parking area. Please note that the development and related operation of facilities or infrastructure for the storage and/or handling of a dangerous good, where such storage occurs in containers with a combined capacity of 30m<sup>3</sup> but less than 80m<sup>3</sup> outside urban areas, triggers Activity 10 of Listing Notice 3 of the EIA Regulations, 2014 (as amended). However, since Activity 19 of Listing Notice 2 includes all other listed activities contained in Listing Notices 1 – 3 of the EIA Regulations, 2014 (as amended), authorisation is not required for Activity 10 of Listing Notice 3, provided that the impacts of said activity are identified and addressed.
9. Ideally, the description of the affected environment should have been extracted from the various specialist assessments that provided detailed information on the environmental attributes associated with the development footprint focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects. This is required by regulation 3(1)(k) of Appendix 3 of the EIA Regulations, 2014 (as amended), which requires a summary of the findings and recommendations of any specialist report. Instead, the Draft EIA Report refers to information obtained from other sources. This particularly relates to the lack of description of the coastal dune system, beach environment and some rocky headlands as described in Botanical-Biodiversity Assessment prepared by Bergwind Botanical Surveys & Tours CC dated June 2024.
10. Please amend Figure 4 and Appendix 1 (detailed site layout plan) to indicate the location of the proposed 20 prospecting pits. This was also requested by the competent authority in its acceptance of the Final Scoping Report ("FSR") on 04 April 2024. Please further note that regulation 3(1)(l)(ii) of Appendix 3 of the EIA Regulations, 2014 (as amended) require that "An *environmental impact Assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include an environmental impact statement which contains a map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers*" (emphasis added). The various environmental sensitivities as identified in the specialist assessments (e.g., critical biodiversity areas, ecological support areas, etc.) and no-go areas, if any, must be indicated.
11. Further to the above, the coordinates of the 20 prospecting pits must be provided in addition to what is provided in Table 2 (coordinates of bulk sampling trenches). This was also requested by the competent authority in its acceptance of the FSR.
12. It is recommended that the Draft Environmental Management Programme ("EMPr") included as Part B of the Draft EIA Report and the Draft EMPr dated June 2024 (Appendix 13) be reconciled so that one EMPr is available for review and implementation, should environmental authorisation ("EA") be granted.

13. The EMPr included as Part B and the standalone EMPr do not include all the impacts and recommendations of the various specialists, as required by regulation 3(1)(k) of Appendix 3 of the EIA Regulations, 2014 (as amended). The Draft EIA Report did not include the complete impact assessment as indicated by the various specialists, e.g. not all the impacts identified in section 4.2 of the Marine Ecology Assessment compiled by Pisces Environmental Services (Pty) Ltd dated February 2024 have been included in the EIA Report. Similarly, the EIA Report did not include all the recommendations and mitigation measures of said specialist assessment as identified in section 4.2, as well as the Mitigation and Management Plan identified in section 6.8, which details the specific management commitments that should be implemented to prevent, minimise or manage significant negative impacts.
14. The EMPr included as Part B states that: "*It is hereby requested that the environmental authorisation be made valid for a period of 10 years, as 10 years is the limit to which an environmental authorisation can remain valid without a detailed Part 2 amendment process having to be followed.*" Please note that this request cannot be entertained as section 17(6) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) ("MPRDA") states that: "*A prospecting right is subject to this Act, any other relevant law and the terms and conditions stipulated in the right and is valid for the period specified in the right which period may not exceed five years.*" Furthermore, section 18(4) of the MPRDA, 2002 states that "*A prospecting right may be renewed once for a period not exceeding three years.*" It is thus clear that the EA may only be valid for a period not exceeding 8 years.
15. General:
  - 15.1. The competent authority's reference number as indicated on the cover page of the Draft EIA Report is incorrect.
  - 15.2. The Underwater Heritage Impact Assessment compiled by Vanessa Maitland dated 14 July 2023, undertaken as part of a previous prospecting right application by the applicant (WC 30/5/1/1/2/10434PR), must be submitted to the South African Heritage Resources Agency for their comments.
  - 15.3. Please indicate where waste from the tough bags processed for the final recovery of diamonds will be backfilled. Will this be within the prospecting trenches or pits?
  - 15.4. Reference to the National List of Ecosystems that are Threatened and in Need of Protection, 2011 (GN No. 1002 dated 2 December 2011) must be replaced with the Revised National List of Ecosystems that are Threatened and in Need of Protection in GN No. 2747 of 18 November 2022.
  - 15.5. The Botanical-Biodiversity Assessment focussed on prospecting that "*would take place at 16 trenches between the high-water and low-water marks on the beaches in the study area*". This is incorrect as 4 bulk sampling trenches and a maximum of 20 prospecting pits are proposed.

Directorate: Biodiversity and Coastal Management – Mr Ryan Apolles (Email: [Ryan.Apolles@westerncape.gov.za](mailto:Ryan.Apolles@westerncape.gov.za); Tel.: (021) 483 2817):

16. The proposal involves prospecting activities for diamonds between the high-water mark and the low-water mark of the sea. A significant aspect of the activity may cause potential dune damage or its destruction, should water from prospecting activities undercut steeper dunes, thus resulting in collapse. It is acknowledged that the Draft EIA Report includes a key mitigation measure of the avoidance of any activity near vulnerable coastal dunes. This would therefore require that the activity be adequately set back from vulnerable coastal dunes, or that those areas be completely avoided.

17. The shortcoming of the Draft EIA Report is that no information is provided to delineate the extent of the high-water mark, which clearly depicts the extent of coastal dunes, or indicate the locality of vulnerable dune areas. Presenting this information would be important to consider where the activity is proposed in relation to the footprint (seaward extent) of vulnerable dune systems, to understand where the potential pinch points are, areas that should possibly be avoided, or where buffers should be applied.
18. The Draft EIA Report and EMPr refer to demarcating no-go areas; however, paragraph 17.9 of the standalone EMPr appears to indicate that the no-go areas will still be decided, and therefore, it does not appear that these no-go areas will be confirmed during the EIA process. I&APs will therefore not be able to assess and comment on where the proposed no-go areas are. It is essential that the no-go areas are identified upfront so that the competent authority make an informed decision during the decision-making process.
19. This Directorate holds the view that there are sufficient resources available, using aerial photography and the appointed specialists, to already have identified no-go areas, even if preliminary with further refinement at a later stage. This is evident in the Botanical-Biodiversity Assessment which concluded that: "*Based on the data collected and analyzed for the Bulk Sampling Project in the designated area, the negative impact is rated as Medium Negative overall, but it would be possible to mitigate it to Low Negative. Taking all the ecological factors into consideration, and as long as good practice is implemented, and the No Go areas observed...*" The risk is that no-go areas are to be identified outside the EIA process, which is procedurally flawed as it limits I&APs scrutiny on significant aspects and impacts and creates uncertainty as to where the no-go areas are to be allocated. If no go-go areas are not adequately observed, it would raise the impact risk rating profile.
20. Cumulative impacts are a significant aspect that must consider the possibility of other proponents also attaining prospecting or mining rights within and near the same area (30km radius). Given the lack of a strategic environmental assessment for the area, the cumulative impact(s) cannot be adequately addressed and managed.
21. This Directorate's comment on the DSR stated that the statement regarding bulk sampling until approximately 1 000 carats has been recovered, appears to provide a caveat that is open ended, which could be interpreted as an open-ended condition that determines the extent of activity, rather than the extent of the drill holes and trenches. The EAP's response is given as "noted" with no clarification provided. This response is inadequate.
22. Considering the above comments, this Directorate **does not support** the proposal.  
  
Directorate: Pollution and Chemicals Management – Mr Gunther Frantz (Email: [Gunther.Frantz@westerncape.gov.za](mailto:Gunther.Frantz@westerncape.gov.za); Tel.: (021) 483 2975):
23. The proposed activity involves the prospecting for alluvial diamonds with bulk sampling between the high-water mark and low-water mark of the sea. This section of the coast is a very sensitive environment and extreme care must be taken when conducting prospecting activities in this environment. For this reason, this Directorate would like to reiterate the following measures to prevent pollution occurring:
  - 23.1. The storage of hazardous substances (i.e. diesel, petrol and lubricants etc.) within or near the prospecting trenches should be prohibited and should ideally be located within the construction

camp/ parking area, on an impervious surface within a bund (to accommodate 110% of the maximum allowable volume) to contain any fugitive spillages and/or leakages.

- 23.2. The refuelling and/or repair of heavy earthmoving vehicles should not take place within any prospecting trenches or coastal beach environment and should be conducted over a dedicated impervious area within the construction camp/ parking area.
- 23.3. In the event of a significant spill or leak of hazardous substances (petrol and diesel) during the construction or operational phase, such incident(s) must be reported to all relevant authorities, including the Directorate: Pollution and Chemicals Management in accordance with section 30(5) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") pertaining to the control of incidents. This clause must be written in the EMPr.

Directorate: Waste Management – Ms Helena van Aarde (Email: [Helena.VanAarde@westerncape.gov.za](mailto:Helena.VanAarde@westerncape.gov.za); Tel.: (021) 483 3003):

24. It is indicated in the Draft EMPr that portable/chemical toilets must be in good working condition and cleaned daily. Please note that these ablution facilities must also be inspected regularly for signs of leaks and possible water contamination in the area.

Directorate: Air Quality Management – Ms Nokulunga Goqo (Email: [Nokulunga.Goqo@westerncape.gov.za](mailto:Nokulunga.Goqo@westerncape.gov.za); Tel.: (021) 483 6510):

25. Fugitive dust emissions may be created during invasive prospecting activities. Dust generated during all phases of the proposed activity must comply with the National Dust Control Regulations (GN No. R. 827 of 1 November 2013) promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.
26. Dust is mentioned in the EMPr but the mitigation measures are not explicitly specified. Clearer measures to monitor and prevent fugitive dust emissions must be included in the EMPr.
27. In the Draft EIA Report, one of the proposed mitigation measures requires that excavated material be kept wet with seawater to limit dust, and to backfill prospecting pits and bulk sampling trenches as soon as possible to limit the time that spoil heaps will remain visible. These measures are however not included in the EMPr.
28. It is noted that dust may be generated from vehicles transversing on-site. Kindly indicate the speed limit for vehicles traversing the site in the EIA Report and the EMPr.
29. Large vehicles traversing on-site, and excavation activities may cause significant noise. Noise generated on-site from all the proposed activities must comply with the Western Cape Noise Regulations (Provincial Notice 200/2013). Kindly include these regulations in Table 6 dealing with the policy and legislative context, for consideration and implementation.
30. It is stated in the Draft EMPr that "*Effective noise control measures must be in place and acceptable working hours must be kept (deviations must be approval by the (ECO)).*" Please specify the working hours in both the EIA Report and EMPr.

31. The Directorate recommends that measures to monitor and prevent disturbing noise must be included in the EMPr.
32. Potential air emissions will be in the form of dust pollution and exhaust fumes from vehicles and machinery. Measures to monitor and prevent significant atmospheric emissions must be included in the EMPr.
33. Please note that the comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by officials should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of the application submitted to the competent authority.
34. The applicant is reminded of its "duty of care" prescribed in section 28 of the NEMA, 1998 which states that *"Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment"*, read together with section 58 of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) which refers to one's duty to avoid causing adverse effects on the coastal environment.

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

**Thea Jordan**  
Digitally signed by Thea Jordan  
Date: 2024.07.22 19:45:11 +02'00'

**pp HEAD OF DEPARTMENT  
DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Letter signed by:

**Thea Jordan**

Director: Development Facilitation

**Date: 22 July 2024**

CC: Mr Willy van Breda (DMR)

Email: [Willy.vanbreda@dmre.gov.za](mailto:Willy.vanbreda@dmre.gov.za)

## Maboee

---

**From:** Tashreeq Dollie <tashreeq@protectthewestcoast.org>

**Sent:** Monday, 22 July 2024 19:58

**To:** info@enviroafrica.co.za; bernard@enviroafrica.co.za; maboee@enviroafrica.co.za

**Cc:** Mike Schlebach; Miles Masterson; Patrick Forbes; camila@protectthewestcoast.org; khaya@protectthewestcoast.org; steve@protectthewestcoast.org

**Subject:** PROPOSED PROSPECTING FOR DIAMONDS WITH BULK SAMPLING ON AN APPROXIMATELY 121HA AREA BETWEEN THE LOW-WATER AND HIGH-WATER MARK OF THE SEA: PORTION 4 OF THE FARM RIETFONTEIN EXTENSION NO. 151 AND PORTION 4 OF THE FARM GRAAUW DUINEN NO. 152, VANRHYNSDORP, DM  
**Attachments:** Appendix 13- EMPr.pdf

To Whom It May Concern

We trust this email finds you well. My name is Tashreeq Dollie. I am a Contract Paralegal for the not-for-profit organisation Protect The West Coast (PTWC).

I am contacting you today on behalf of the PTWC in relation to the Proposed Prospecting for Diamonds with Bulk Sampling on an Approximately 121ha Area Between the Low-Water and High-Water Mark of the Sea: Portion 4 of the Farm Rietfontein Extension no. 151 and Portion 4 of the Farm Graauw Duinen no. 152, Vanrhynsdorp, DMR Ref: WC 50/1/1/2/10454/ PR.

The PTWC was established in 2020 by a group of concerned citizens who aim to prevent the continued exploitation of the West Coast caused by destructive mining activities. The team consists of a collective of concerned South Africans (including scientists, journalists, legal and media experts) who work for the organisation to ensure that mining on the West Coast is conducted with the correct and proper oversight in accordance with the fundamental principles of the law.

The PTWC requests that the organisation be registered as an Interested and Affected Party in connection to the above prospecting application. Further, the PTWC submits the following comments in objection of said prospecting application:

"Protect The West Coast objects to the proposed prospecting application (DMR Ref: WC 50/1/1/2/10454/ PR) on the grounds that such application may have a significant adverse impact on nearby communities and the environment. As per the application, this proposed prospecting activity will overlap areas classified as 'Critical Biodiversity Areas' (CBAs) (see pages 6 to 7 of the Environmental Management Programme attached herein for reference). These areas are defined as terrestrial (for example, threatened vegetation type remnants) and/or aquatic features (for example, vleis, rivers and estuaries), and buffer areas along aquatic CBA features, whose safeguarding is critically required in order to meet biodiversity pattern and

process thresholds. Such areas are identified through a systematic biodiversity planning approach and represent the most land-efficient option to meeting all thresholds. The proposed prospecting application can disturb the CBAs and risk jeopardising an area that is essential to maintaining the aforesaid thresholds, which may lead to irreversible damage of which may then potentially impact nearby communities that are dependent on such areas. It is on these grounds that the proposed prospecting application cannot proceed and must be denied approval."

Kindly acknowledge receipt thereof. We look forward to hearing from you soon.

--

Kind Regards

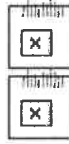
Tashreeq Dollie  
Contract Paralegal



**Protect The West Coast**

E: [tashreeq@protectthewestcoast.org](mailto:tashreeq@protectthewestcoast.org)

W: <https://www.protectthewestcoast.org/>



Watch Ours, Not Mine [here](#)



## Maboee

---

**From:** Maboee <maboee@enviroafrica.co.za>  
**Sent:** Wednesday, 24 July 2024 12:10  
**To:** 'isabelle@kcplaw.co.za'  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Dear I. Jacobs-Lans,

The proposed prospecting with bulk sampling activities will include implementing dust suppression measures such as keeping the excavated material wet, enforcing speed limits on vehicles that come to and vehicles that leave the proposed site *etc.*

The proposed diamonds prospecting with bulk sampling will not alter the flow of seawater nor disrupt any natural processes that contribute to the formation of salt deposits.

The EMPr for the proposed prospecting with bulk sampling includes measures for minimising any kind of disturbance to the existing environment, including measures for minimising disturbance to landuses near the proposed site.

In addition, A Rehabilitation and Closure Plan has also been compiled so that upon completion of the prospecting with bulk sampling project, the environment can be restored to a condition resembling the condition of the environment prior to commencement of the proposed prospecting with bulk sampling.

Please go ahead and review the EMPr and the Rehabilitation and Closure Plan.

Kind regards,

**Maboee Nthejane**



EnviroAfrica cc

p: +27 21 851 1616 m: 084 037 2477

f: +27 86 512 0154  
a: Unit 7, Pastorie Park, Reitz St, Somerset West 7130  
P. O. Box 5367, Helderberg 7135  
w: www.enviroafrica.co.za e: info@enviroafrica.co.za

**From:** isabelle@kcplaw.co.za <isabelle@kcplaw.co.za>  
**Sent:** Monday, July 22, 2024 6:22 PM  
**To:** maboe@enviroafrica.co.za; info@enviroafrica.co.za  
**Cc:** brian@sunsalt.co.za; 'Pieter Swart' <pieter@cawoodsalt.co.za>; Johette - Koos Coetzee Prokureurs <admin@kcplaw.co.za>  
**Subject:** FW: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good day

Please see the attached comment.

*Kind Regards | Vriendelike Groete*

**ISABELLE JACOBS-LANS** BCom LLB  
Attorney | Prokureur  
Conveyancer | Aktebesorger

Email | Epos: [isabelle@kcplaw.co.za](mailto:isabelle@kcplaw.co.za)  
Tel: 027 213 1869  
14 Dorp Street | Dorp Straat 14  
Vredendal, 8160

**KOOS COETZEE**

**PROKUREURS ING.**

**3, PLEASE READ THIS IMPORTANT WARNING AGAINST CYBERCRIME:**

Whilst we take all reasonable measures against cyber threats on our end, some cyber criminals may be able to intercept e-mails and fraudulently change the banking details on invoices, bank letters or other PDF documents sent to you for payment. Please note that our bank account details will remain the same for the foreseeable future and that we have no plans to ever change our bank account details. Any e-mail from "us" advising you that our bank account details have changed may therefore in fact be an email from a scammer. Kindly contact us immediately in the event of you receiving any such email from "us". To prevent financial losses to yourself, always verify the accuracy of banking details before making payment to any new recipient and/or bank account, no matter how authentic the invoice and/or document and/or e-mail may appear. Therefore, please contact us to verify

our banking details telephonically and/or use your bank's account verification service when making an online EFT payment (additional bank charges may apply). We accept no liability for any loss arising from any cybercrime and/or any failure by you to adequately confirm the ostensible banking details of the intended recipient.

**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Sent:** Thursday, June 20, 2024 1:27 PM  
**To:** 'Maboeë' <[maboeë@enviroafrica.co.za](mailto:maboeë@enviroafrica.co.za)>  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals ("DMR").

The Draft Environmental Impact Report and associated appendices for the application for environmental authorisation are available for public comment from 20 June 2024 to 22 July 2024.

Interested and Affected Parties can access the Draft Scoping Report and associated appendices by clicking on the following internet link <https://we.tl/t-6RIF2MbnSs>, as well as by visiting the website of EnviroAfrica i.e., [enviroafrica.co.za/projects/for-public-participation/](http://enviroafrica.co.za/projects/for-public-participation/) and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".

Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboeë@enviroafrica.co.za](mailto:maboeë@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

Margaret Christians



**EnviroAfrica cc**

p: +27 21 851 1616

f: +27 86 512 0154

a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130

P.O. Box 5367, Helderberg, 7135

w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

**BE 100% GREEN, READ FROM THE SCREEN**

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**Maboee**

**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Sent:** Thursday, 20 June 2024 13:27  
**To:** 'Maboee'  
**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals (“DMR”).

The Draft Environmental Impact Report and associated appendices for the application for environmental authorisation are available for public comment from 20 June 2024 to 22 July 2024.

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Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

Margaret Christians



**EnviroAfrica**

Environmental Management and Impact Assessment  
Omgewingsbestuur en Impakbeoordeling



**EnviroAfrica cc**

p: +27 21 851 1616

f: +27 86 512 0154

a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130  
P.O. Box 5367, Helderberg, 7135

w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

**BE 100% GREEN, READ FROM THE SCREEN**

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**Maboee**

**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Sent:** Thursday, 20 June 2024 13:32  
**To:** 'Maboee'  
**Subject:** FW: Automatic reply: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Keep this as records

**Margaret Christians**



**EnviroAfrica cc**  
p: +27 21 851 1616  
f: +27 86 512 0154  
a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130  
P.O. Box 5367, Helderberg, 7135  
w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

**BE 100% GREEN, READ FROM THE SCREEN**

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**From:** Brandon Layman <[Brandon.Layman@westerncape.gov.za](mailto:Brandon.Layman@westerncape.gov.za)>  
**Sent:** Thursday, June 20, 2024 1:31 PM  
**To:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Subject:** Automatic reply: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Please note that I am on leave. I will attend to your email on my return on 24 June 2024. Please call 0218085096 for Ms. Fadwa Mohammed.

"All views or opinions expressed in this electronic message and its attachments are the view of the sender and do not necessarily reflect the views and opinions of the Western Cape Government (the WCG). No employee of the WCG is entitled to conclude a binding contract on behalf of the WCG unless he/she is an accounting officer of the WCG, or his or her authorised representative. The information contained in this message and its attachments may be confidential or privileged and is for the use of the named recipient only, except where the sender specifically states otherwise. If you are not the intended recipient you may not copy or deliver this message to anyone."



## Maboee

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**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Sent:** Thursday, 20 June 2024 14:37  
**To:** 'Maboee'  
**Subject:** FW: Automatic reply: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

**From:** Yashke Walters <[ywalters@capenature.co.za](mailto:ywalters@capenature.co.za)>  
**Sent:** Thursday, June 20, 2024 2:29 PM  
**To:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>  
**Subject:** Automatic reply: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Good day

Kindly note that I am no longer at CapeNature. Please contact [iadams@capenature.co.za](mailto:iadams@capenature.co.za) or [mwheeler@capenature.co.za](mailto:mwheeler@capenature.co.za) for assistance.

Kind regards,

## Maboee

---

**From:** Max Elkington <maxpelkington@gmail.com>  
**Sent:** Tuesday, 09 July 2024 07:58  
**To:** maboee@enviroafrica.co.za  
**Subject:** Registration as I&AP

**Name:** Max Elkington  
**Email:** [maxpelkington@gmail.com](mailto:maxpelkington@gmail.com)

**Project Name:**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DRME reference number:**  
WC 50/1/1/2/10454/ PR

**Comments:**

I have spent a lot of time travelling that coastline with my family over the years. It is beautiful and that stretch of coastline has some of the best waves in the world. Surfers from all over the world travel to surf the area. The area is a tourist attraction as it is some of the last untouched beautiful coastline we have.

I have seen what the mines have done further south. The mines have destroyed the beaches and the wildlife. Leaving it as a pile of black dirt. Please leave these beaches alone.

---

**Maboee**

**From:** Konstant van Huyssteen <konstantvanhuyssteen@gmail.com>  
**Sent:** Tuesday, 09 July 2024 09:45  
**To:** maboee@enviroafrica.co.za; bernard@enviroafrica.co.za  
**Subject:** Objection to Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**I, Konstant van Huyssteen, hereby object to the Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp.**

My contact details are as follows:

109 Edward Court, 41 Beach Road, Cape Town, 8005.  
email: [konstantvanhuyssteen@gmail.com](mailto:konstantvanhuyssteen@gmail.com) (preferred method of communication)

**Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DMRE Ref No**

WC 50/1/1/2/10454/ PR

I have no business interest in the application.

I do have a personal interest in the objection against the application.

My comments are that the "Decommissioning Phase" of the majority of coastal mining activities on the West Coast are not properly enforced, nor are the mining companies held liable for the devastation they cause.

In the current diamond market, where lab-grown diamonds have infiltrated the organic diamond supply, destroying an irreplaceable piece of nature to dig up some stones that could be synthesised in a lab, is backward thinking.

Best

Kon van Huyssteen

---

**Maboee**

**From:** tayla-paige van sittert <taylapaigevs@gmail.com>  
**Sent:** Tuesday, 09 July 2024 12:08  
**To:** maboee@enviroafrica.co.za  
**Subject:** My concerns for the new bulk diamond prospecting application in the heavily mined West Coast zone.

To whom it may concern,

This email serves as an application to register as an Interested and Affected Party (I&AP) and to submit my concerns for the new bulk diamond prospecting application in the heavily mined West Coast zone.

I am Tayla-Paige van Sittert and I prefer to be contacted via email.

I reject the proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

DMRE Ref No: WC 50/1/1/2/10454/ PR

I do not support the project of gouging out the Earth to determine the potential to mine in full, according to the Environmental Impact Report (IER) and Environmental Management Programme (EMPr).

It is obscene to dig holes for diamonds in the centre of an ecologically sensitive area, which is also popular for recreational activities and local communities, who rely on their catches for sustenance and income.

It is not enough that the Fish by the Sea application claims the effect of this prospecting on fauna and flora at the location will be zero – and the EMPr stipulates several measures aimed at preventing any damage during the prospecting process – because the documentation also concedes that the proposed site overlaps a marine Critical Biodiversity Area.

The full-scale mining that is likely to follow could very well eradicate this sensitive ecosystem, which is a tragedy of the largest scale.

I don't want to live in a country that so willingly pushes environmental and social concerns aside in order to profit. These priorities can have dire circumstances as not only do local creatures communities need the diverse fauna and flora intact for their very survival, but the region relies on tourism and an active interest in visiting such pristine nature. If the environment is damaged, our lives become dismal.

I support Protect The Wild Coast's pleas with the authorities for a moratorium on all mining applications, and a Strategic Environmental Assessment (SEA) for the entire region.

Thank you for your consideration. I trust this is all in order.

Regards,  
Tayla-Paige van Sittert

## Maboee

---

**From:** Kate Ahrends <ahrendskate@gmail.com>  
**Sent:** Wednesday, 10 July 2024 15:38  
**To:** maboee@enviroafrica.co.za  
**Subject:** Letter of Objection - DMRE REF: WC 50/1/1/2/10454/ PR

### To whom it may concern,

My name is Kate Ahrends, I am emailing you regarding the following Project:

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

DMRE REF: WC 50/1/1/2/10454/ PR

I am hugely appalled at the prospects of this operation being carried out. There is absolutely no regard for the future of this coastline in the long run and the radical environmental damages it will cause in an area that is so ecologically sensitive. Apart from this being a recreational area for hikers, surfers and local communities, this area is also where local fishermen get their income and sustenance. These communities are continually overlooked by the government, for money grabbing capitalist business opportunities which yield no value for local economy.

In a world with climate concerns growing rapidly, this is NOT what should be permitted. We should be protecting these coastlines which belong to a diversity of animal and plant life.

I have no financial interest in this decision. I am writing to you because this is WRONG on so many fronts and decisions should be made with greater foresight into the future than the short gains of possibility.

Thank you for reading this, I hope it lands with understanding.

**Kate**  
Kate Ahrends

## **Maboee**

---

**From:** Jason Smith <me.jason.smith@gmail.com>  
**Sent:** Wednesday, 10 July 2024 15:40  
**To:** maboee@enviroafrica.co.za  
**Subject:** Mining Objection

Good day

Please note my objection to the following project:

**Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DMRE Ref No**

WC 50/1/1/2/10454/ PR

The environmental impact will be devastating to the region.

Jason Smith  
Big Bay Cape Town  
[me.jason.smith@gmail.com](mailto:me.jason.smith@gmail.com)



## Maboee

---

**From:** John Yeld <jayeld@gmail.com>  
**Sent:** Wednesday, 10 July 2024 16:17  
**To:** maboee@enviroafrica.co.za  
**Subject:** Register as IAAP

Dear Maboee -

Kindly register me as an IAAP for the following project for which I understand EnviroAfrica is the environmental practitioner. Please will you confirm receipt of my email.

**Project Name**

***Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp***  
**DMRE Ref No**  
**WC 50/11/2/10454/ PR**

My contact details are below in my email address.  
With thanks and regards,  
John Yeld

---

**JOHN YELD**  
**Journalist**

[jayeld@gmail.com](mailto:jayeld@gmail.com) 082 853-4078 @johnyeld  
Specialising in environmental & science writing, photojournalism

## Maboee

---

**From:** Marc Rogoff <marc\_shopping@mac.com>  
**Sent:** Wednesday, 10 July 2024 16:20  
**To:** maboee@enviroafrica.co.za  
**Subject:** West coast prospecting

- **Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DMRE Ref No**

WC 50/1/1/2/10454/ PR

I am writing to object in the strongest terms to the proposed project above. The environmental impact will be immense as it is with all alluvial diamond prospecting. Affecting wildlife from top to bottom of the food chain and ruining the beauty of the area.

Marc Rogoff

0609358521

18b Victoria road

Bakoven

Capetown



Marc Rogoff  
Tel: +44(0)7970 027 786  
Email: [marc@macrogoff.com](mailto:marc@macrogoff.com)  
[www.macrogoff.com](http://www.macrogoff.com)

---

**Maboee**

**From:** Grenville White <grenville@mweb.co.za>  
**Sent:** Wednesday, 10 July 2024 17:43  
**To:** maboee@enviroafrica.co.za  
**Subject:** IAP Registration

Hi

I wish to register as an IAP for this project,

**DMRE Ref No**

WC 50/1/1/2/10454/ PR

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

I have a personal interest in the matter, and if you could please use my email [grenville@mweb.co.za](mailto:grenville@mweb.co.za) for correspondence.

Kind regards

**Grenville**

---

G R E N V I L L E W H I T E

P.O.Box 44897, Claremont, 7735  
Mobile +27 (83) 648-6467  
Fax +27 (86) 689-1462

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**Maboee**

---

**From:** Diana <dianaruizcoogan@gmail.com>  
**Sent:** Wednesday, 10 July 2024 19:32  
**To:** maboee@enviroafrica.co.za

Hi, my name is Diana and my contact number is 0685121540.

This email is regarding the following project proposal:

**Project Name:**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DMRE Ref No**

WC 50/1/1/2/10454/ PR

**My comment on the above stated project proposal:**

I am a concerned SA citizen and would like to let you know that the project stated below should be halted. Mining should be stopped in this zone, due to its ecological sensitivity and importance, as well as its recreational uses enjoyed by many. Our natural environment is finite and should be protected for current and future generations to come.

The mines which do exist have a very large footprint and have destroyed irreplaceable natural landscapes.

Regards

## Maboee

---

**From:** baretta@telkomsa.net  
**Sent:** Thursday, 11 July 2024 09:12  
**To:** maboee@enviroafrica.co.za  
**Subject:** Objection to Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

Gretchen Baretta  
4 Avenue de Mist, Rondebosch  
7700

Email: baretta@telkomsa.net

**Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DMIRE Ref No**

WC 50/1/1/2/10454/ PR

Environmental disaster for all the flora, fauna and communities in the area. No benefit to any of aforementioned but only company involved.

Gretchen Baretta

---

## Maboee

**From:** Rohan Etsebeth <rohan@archival.co.za>  
**Sent:** Thursday, 11 July 2024 10:57  
**To:** maboeee@enviroafrica.co.za  
**Subject:** Opposition to WC 50/1/1/2/10454/ PR

My name is Rohan Etsebeth

I am mailing to register as an Interested and Affected Party and to object to:

**Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

**DMRE Ref No**

WC 50/1/1/2/10454/ PR

I lived in Garies and surfed on the West Coast in my youth. My family also own a house in St Helena Bay. We also know people who do tours with donkeys or 4x4's or just hiking. This mining will certainly kill the beauty of this area. Even just 4x4's are damaging to the sensitive biodiversity of the West Coast if not managed; mining is completely dismantling the West Coast and the mining applications are always sugar coating how they will tread lightly, only to leave the sites in conditions that will never be able to return to its former state. Not even remotely. I stand opposed to the Environmental Impact Report and Environmental Management Programme Report as I know how bad mining areas look once mining has been concluded. The only way to protect our natural environment is to not allow mining on it.

My preferred method of notification will be email.

Please consider the future and not the immediate greedy gains to be made by ripping our natural coastline to shreds.  
Thank you

--  
ROHAN ETSEBETH  
[rohan@archival.co.za](mailto:rohan@archival.co.za)

(t) +27 21 300 5140

(c) +27 83 612 9776

<http://www.archival.co.za>

**Aardroos street 24,  
Bellville Rock City.**

*"Give me six hours to chop down a tree and I will spend the first four sharpening the axe." - Abraham Lincoln*

## **Maboee**

---

**From:** Richard Staniforth <stanirich@gmail.com>  
**Sent:** Thursday, 11 July 2024 13:48  
**To:** maboee@enviroafrica.co.za  
**Subject:** DMRE Ref No WC 50/1/1/2/10454/ PR

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

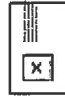
The abovementioned project plan refers:

Will we be satisfied that we've mined enough of South Africa when we are left with a gigantic hole after everything above ground level has been dug up, put onto ships and exported?

Laugh all you like but that is the reality of mining and it's high time we found another way.

Even more concerning, is that you want to mine in the most beautiful and sensitive areas along the coastline – NO, THIS IS NOT OKAY!!!!

**Richard Staniforth.  
14 Andrew Avenue,  
Rexford,  
Knysna.  
6571  
+27 82 800 8222**



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## **Maboee**

---

**From:** Chip Snaddon <chip0156@gmail.com>  
**Sent:** Thursday, 11 July 2024 14:53  
**To:** maboee@enviroafrica.co.za  
**Subject:** IAP request

### Contact details:

AJ Snaddon  
[chip0156@gmail.com](mailto:chip0156@gmail.com)  
0827459358

### **Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

### **DMRE Ref No**

WC 50/1/1/2/10454/ PR

recreational user

I seriously doubt whether the proposed environmental protections for the proposed area will be adhered to, given the evidence of the destruction of the ecosystem at similar sites in the area and the lack of promised rehabilitation.

## Maboee

---

**From:** Chantal Lucille <chantal\_lucille@rocketmail.com>  
**Sent:** Saturday, 13 July 2024 09:26  
**To:** maboee@enviroafrica.co.za  
**Subject:** DMRE Ref No WC 50/1/1/2/10454/ PR

Good day,

**DMRE Ref No WC 50/1/1/2/10454/ PR** bears reference.

My name is Chantal Lucille van der Merwe, chantal\_lucille@rocketmail.com / 074 851 2656 (preferred method of contact: email).

I have an interest in:

**Project Name**

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

I hereby object to the proposed prospecting for diamonds due to the negative environmental impact caused by same.

After having read the EIR and EMPR it is clear that the effects of prospecting and mining will negatively impact the ecologically sensitive area popular for surfing, recreational campers, hikers, fishermen, and local communities, who rely on their catches for sustenance and income.

The prospecting zone is home to several great beach and reef breaks and the reports fail to mention that there are also several operational mines adjacent to this area, as well as several on the nearby coast, including the vast Namakwa Sands heavy sand mineral mine run by Tronox.

I therefore object to avoid yet another part of the West Coast being ripped to pieces.

I trust that my objection will be favourably considered.

Thank you  
Chantal

## Maboee

---

**From:** Suzani Reitz <suzanivandermerwe@gmail.com>  
**Sent:** Sunday, 14 July 2024 09:12  
**To:** maboee@enviroafrica.co.za  
**Cc:** Mark Reitz  
**Subject:** Request to register as I&AP - DMRE Ref No WC 50/1/1/2/10454/ PR

Hi there,

I would like to register as an I&AP for the Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp (DMRE Ref No WC 50/1/1/2/10454/ PR).

My contact details are Suzani Reitz - [suzanireitz@gmail.com](mailto:suzanireitz@gmail.com)

This mining application is incredibly concerning and, should it go ahead, will have irreversible, devastating effects on the environment. It will also have a negative effect on the local economy of tourism and fishing, while lowering the quality of life of residents. I strongly oppose this application.

Best,  
--  
Suzani Reitz

## **Maboee**

---

**From:** Frances Storey <francesstorey159@gmail.com>  
**Sent:** Monday, 15 July 2024 09:30  
**To:** maboee@enviroafrica.co.za  
**Subject:** Register as an I&AP and concerns

Frances Storey  
[francesstorey159@gmail.com](mailto:francesstorey159@gmail.com)

Project name information: Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

DMRE reference number:  
WC 50/1/1/2/10454/ PR

Objection to activity.

The area is which this bulk sampling will take place in the centre of an ecologically sensitive area popular for surfing, recreational campers, hikers, fishermen, and local communities, who rely on their catches for sustenance and income.

## Maboee

---

**From:** Niña Jochum <nina.jochum@gmail.com>  
**Sent:** Tuesday, 16 July 2024 11:47  
**To:** maboee@enviroafrica.co.za  
**Subject:** DMRE Ref No WC 50/1/1/2/10454/ PR

Hi my name is Ninja Jochum

Contacting you in regards to - Environmental Impact Report (EIR) and Environmental Management Programme Report

Contact details :  
nina.jochum@gmail.com  
mark.social.swellendam@gmail.com

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp.

DMRE Ref No  
WC 50/1/1/2/10454/ PR

Comments - Stop this Application! Our Endemic Nature is not for sale!

+

Appendix -13-EMPr1

Page 6: in EMPr for Construction & Operation – The proposed site overlaps a marine and Critical Endangered Namaqualand Biodiversity Area.

Multiple species, Critically endangered.

Page 23: in EMPr for Construction & Operation  
Section 17.15 :Solid Waste Management

No on-site burying or dumping of any waste materials, vegetation, litter or refuse must occur.

+

Appendix 7 - Impact Scoring  
Negative Impact - marked a 10 (because an 11 would make it HIGHLY sensitive)

Before and during Mitigation:

Topographic NEGATIVE impact caused by neglected spoil heaps.  
HIGH Pollution through littering and from inappropriate disposal of sewage.  
HIGH Veld fire risk: Potential risk of veld fires.  
Creation of a few short-term employment opportunities

After Mitigation? Still Negative 10

Obstruction of public access to coast. (because it is now destroyed)  
NEGATIVE Impact on nearshore marine biodiversity ( obviously )  
Visual disturbance to onlookers (because it is now a mine!)  
It's not beautiful a mine, especially when beforehand it was a pristine environment.  
Shame.

+

EIR-EMPr-Template

Page 5

Operational Phase

Activities - Overburden dumps

Potential Impact - Terrestrial biodiversity disturbance/loss from on-site prospecting with bulk sampling activities and from vehicles.  
Disturbance/Death of onsite wildlife and vegetation from removal of existing vegetation and from sampling areas and service roads. Damage to coastal dune system etc...

Aspects affected - Terrestrial biodiversity (Endemic/Indigenous)

Significance (before mitigation) HIGH

Proposed mitigation - Keep development footprint between the low and the high-water mark of the sea and on patches that are devoid of Indigenous vegetation and that are

located seaward of the sand dunes - Backfill prospecting pits and bulk sampling trenches

with spoil as possible to enable invertebrates living in topsoil to return as soon as possible - Appoint biodiversity specialist and implement

recommendations of biodiversity specialist and comply with any requirements specified by CapeNature, DEA&DP”  
Oceans and Coast an DFFE: Oceans and Coasts

Pathetic really, if this is what was proposed.

I could continue, however, I think three comments are enough for now.

Thank you for your time.

Regards

N



## Maboee

---

**From:** Karen Elkington <karenelkington@gmail.com>  
**Sent:** Saturday, 20 July 2024 13:48  
**To:** maboee@enviroafrica.co.za  
**Subject:** Registration as an interested and affected person with regard to prospecting application ref WC 50/1/12/10454/PR

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen  
No. 152, Vanrhynsdorp  
DMRE Ref No  
WC 50/1/12/10454/ PR

To whom it may concern

I would like to register as an interested and affected person with regard to the above proposal.

I am extremely concerned about the proposed prospecting by the company Fish By The Sea in this fragile unspoilt coastal environment. There has been wide spread environmental irreversible destruction as a result of diamond mining on the west coast with no attempt to rehabilitate. I strongly urge the authorities to protect South African coastline from ruthless developers who act purely for private profit and do not consider the unique and outstanding environment of South Africa.

Please notify me of developments by email karenelkington@gmail.com

Yours faithfully Karen Elkington  
Sent from my iPhone

## Maboee

---

**From:** isabelle@kcplaw.co.za  
**Sent:** Monday, 22 July 2024 18:22  
**To:** maboee@enviroafrica.co.za; info@enviroafrica.co.za  
**Cc:** brian@sunsalt.co.za; 'Pieter Swart'; Johette - Koos Coetzee Prokureurs  
**Subject:** FW: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)  
**Attachments:** 20240722192130115.pdf

Good day

Please see the attached comment.

*Kind Regards | Vriendelike Groete*

**ISABELLE JACOBS-LANS** BCom LLB  
Attorney | Prokureur  
Conveyancer | Aktebesorger

Email | Epos: [isabelle@kcplaw.co.za](mailto:isabelle@kcplaw.co.za)  
Tel: 027 213 1869  
14 Dorp Street | Dorp Straat 14  
Vredendal, 8160

**KOOS COETZEE**

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**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Sent:** Thursday, June 20, 2024 1:27 PM

**To:** 'Maboee' <[maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za)>

**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals ("DMR").

The Draft Environmental Impact Report and associated appendices for the application for environmental authorisation are available for public comment from 20 June 2024 to 22 July 2024.

Interested and Affected Parties can access the Draft Scoping Report and associated appendices by clicking on the following internet link <https://we.tl/t-6RiF2MbnSs>, as well as by visiting the website of EnviroAfrica i.e., [enviroafrica.co.za/projects/for-public-participation/](http://enviroafrica.co.za/projects/for-public-participation/) and clicking on the heading "Projects" and thereafter clicking on the sub-heading "Public Participation".

Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboee@enviroafrica.co.za](mailto:maboee@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

Margaret Christians



**EnviroAfrica**

Environmental Management and Impact Assessment  
Omgewingsbestuur en Impakbeoordeling

**EnviroAfrica cc**

p: +27 21 851 1616

f: +27 86 512 0154

a: Unit 7, Pastorie Park, Reitz St, Somerset West, 7130

P.O. Box 5367, Helderberg, 7135

w: [www.enviroafrica.co.za](http://www.enviroafrica.co.za) e: [info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)

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**Maboee**

**From:** Tashreeq Dollie <tashreeq@protectthewestcoast.org>

**Sent:** Monday, 22 July 2024 19:58

**To:** info@enviroafrica.co.za; bernard@enviroafrica.co.za; maboee@enviroafrica.co.za

**Cc:** Mike Schlebach; Miles Masterson; Patrick Forbes; camila@protectthewestcoast.org; khaya@protectthewestcoast.org; steve@protectthewestcoast.org

**Subject:** PROPOSED PROSPECTING FOR DIAMONDS WITH BULK SAMPLING ON AN APPROXIMATELY 121HA AREA BETWEEN THE LOW-WATER AND HIGH-WATER MARK OF THE SEA: PORTION 4 OF THE FARM RIETFontein EXTENSION NO. 151 AND PORTION 4 OF THE FARM GRAAUW DUINEN NO. 152, VANRHYNSDORP, DM  
**Attachments:** Appendix 13- EMPPr.pdf

To Whom It May Concern

We trust this email finds you well. My name is Tashreeq Dollie. I am a Contract Paralegal for the not-for-profit organisation Protect The West Coast (PTWC).

I am contacting you today on behalf of the PTWC in relation to the Proposed Prospecting for Diamonds with Bulk Sampling on an Approximately 121ha Area Between the Low-Water and High-Water Mark of the Sea: Portion 4 of the Farm Rietfontein Extension no. 151 and Portion 4 of the Farm Graauw Duinen no. 152, Vanrhynsdorp, DMR Ref: WC 50/1/1/2/10454/ PR.

The PTWC was established in 2020 by a group of concerned citizens who aim to prevent the continued exploitation of the West Coast caused by destructive mining activities. The team consists of a collective of concerned South Africans (including scientists, journalists, legal and media experts) who work for the organisation to ensure that mining on the West Coast is conducted with the correct and proper oversight in accordance with the fundamental principles of the law.

The PTWC requests that the organisation be registered as an Interested and Affected Party in connection to the above prospecting application. Further, the PTWC submits the following comments in objection of said prospecting application:

"Protect The West Coast objects to the proposed prospecting application (DMR Ref: WC 50/1/1/2/10454/ PR) on the grounds that such application may have a significant adverse impact on nearby communities and the environment. As per the application, this proposed prospecting activity will overlap areas classified as 'Critical Biodiversity Areas' (CBAs) (see pages 6 to 7 of the Environmental Management Programme attached herein for reference). These areas are defined as terrestrial (for example, threatened vegetation type remnants) and/or aquatic features (for example, vleis, rivers and estuaries), and buffer areas along aquatic CBA features, whose safeguarding is critically required in order to meet biodiversity pattern and

process thresholds. Such areas are identified through a systematic biodiversity planning approach and represent the most land-efficient option to meeting all thresholds. The proposed prospecting application can disturb the CBAs and risk jeopardising an area that is essential to maintaining the aforesaid thresholds, which may lead to irreversible damage of which may then potentially impact nearby communities that are dependent on such areas. It is on these grounds that the proposed prospecting application cannot proceed and must be denied approval."

Kindly acknowledge receipt thereof. We look forward to hearing from you soon.

--

Kind Regards

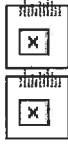
Tashreeq Dollie  
Contract Paralegal



**Protect The West Coast**

E: [tashreeq@protectthewestcoast.org](mailto:tashreeq@protectthewestcoast.org)

W: <https://www.protectthewestcoast.org/>



Watch Ours, Not Mine [here](#)

## Maboee

---

**From:** Emily Winter <emilywinteerr@gmail.com>  
**Sent:** Monday, 22 July 2024 23:26  
**To:** maboeee@enviroafrica.co.za  
**Subject:** I&AP Registration and Objection

To Environ Africa,

I would like to register as an interested and affected party and object to the following project:

Proposed prospecting for diamonds with bulk sampling on approximately 121 ha between low-water and high-water mark on Portion 4 of farm Rietfontein Extension No. 151 and Portion 4 of farm Graauw Duinen No. 152, Vanrhynsdorp

DMRE Ref No

WC 50/1/1/2/10454/ PR

This project is invasive and destructive and will have a devastating effect on the ecosystems and wildlife in this sacred area.

Myself and many others who often visit the west coast and use these beaches and waves will be directly affected by the destruction of them.

Emily Winter  
0834685488  
preferred method of notification - sms

---

**Maboee**

**From:** isabelle@kcplaw.co.za  
**Sent:** Monday, 22 July 2024 18:22  
**To:** maboee@enviroafrica.co.za; info@enviroafrica.co.za  
**Cc:** brian@sunsalt.co.za; Pieter Swart; Johette - Koos Coetzee Prokureurs  
**Subject:** FW: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)  
**Attachments:** 20240722192130115.pdf

Good day

Please see the attached comment.

*Kind Regards | Vriendelike Groete*

**ISABELLE JACOBS-LANS** BCom LLB  
Attorney | Prokureur  
Conveyancer | Aktebesorger

Email | Epos: [isabelle@kcplaw.co.za](mailto:isabelle@kcplaw.co.za)  
Tel: 027 213 1869  
14 Dorp Street | Dorp Straat 14  
Vredendal, 8160

**KOOS COETZEE**

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**From:** Margaret | Enviro Africa <[info@enviroafrica.co.za](mailto:info@enviroafrica.co.za)>

**Sent:** Thursday, June 20, 2024 1:27 PM

**To:** 'Maboe' <[maboe@enviroafrica.co.za](mailto:maboe@enviroafrica.co.za)>

**Subject:** RE: Alluvial diamonds prospecting with bulk sampling at Brand se Baai application (WC 50/1/1/2/10454/ PR)

Dear Interested and Affected Party,

Please be informed that Fish by the Sea (Pty) Ltd has lodged the above-mentioned application for environmental authorisation with the National Department of Minerals ("DMR").

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Should you decide to comment on the Draft Environmental Impact Report, please provide a copy of your letter of comment to EnviroAfrica via the electronic mail address, [maboe@enviroafrica.co.za](mailto:maboe@enviroafrica.co.za) and include the DMR reference number, WC 50/1/1/2/10454/ PR in your correspondence.

Please forward this notification to any other persons that you think may wish to comment on the Draft Environmental Impact Report.

Kind regards,

Margaret Christians



**EnviroAfrica**

Environmental Management and Impact Assessment  
Omgewingsbestuur en Impakbeoordeling

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**BE 100% GREEN, READ FROM THE SCREEN**

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## Maboee

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**From:** M C <clemminshaw@gmail.com>  
**Sent:** Monday, 22 July 2024 18:50  
**To:** maboee@enviroafrica.co.za  
**Subject:** objection to proposed prospecting in area brand se baai

just, I wish to register my objection . I am a camper and visitor to the ara for some 30 years . In that time I see degradation and very limited attempts at rehabilitation. It is time to push back at existing and further development Please register my objection and record me as an interested and affected Party, regards Martin Cleminshaw Cape Town