

**BASIC ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT FOR
PROSPECTING AND RELATED ACTIVITIES ON VARIOUS PORTIONS OF THE FARM HARTEBESPOORT B 410
JQ, LOCATED
BETWEEN SEGWAEELANE AND SONOP IN MADIBENG LOCAL MUNICIPALITY, NORTH WEST PROVINCE**

COMMENTS AND RESPONSES REPORT – VERSION 2

All written and oral submissions received from Interested and Affected Parties (IAPs) are summarised in this report in table format. IAP issues and concerns are listed in Column A, with the names of the IAPs in Column B and the date the issue or concern was raised as well as the correspondence method used, in Column C. Responses to all concerns are provided in Column D.

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A: COMMENTS, QUESTIONS AND ISSUES	B: COMMENT BY	C: SOURCE, DATE	D: EAP RESPONSE
1 GENERAL / IAP REGISTRATION			
<p>1.1 The chairman of the Ngwanadirane Communal Property Association (NCPA) invited the EAP to their meeting on 27/03/2018, but then cancelled and indicated that due procedure had to be followed by the NCPA and that they needed to discuss the development internally first. He stated that a meeting could be held at a later date.</p>	<p>Jeoff Letebele, Chairman of NCPA Owners of various portions</p>	<p>26 & 27 March 2018 Telephonic conversations with EAP.</p>	<p>Agreed with NCPA that will have an internal meeting first to discuss the proposed drilling of boreholes on three of the NCPA properties.</p> <p>Documentation was sent to the NCPA and the EAP contacted them telephonically to confirm that the information was received. A hard copy of the BAR was received.</p> <p>The NCPA did not request a further meeting.</p>
<p>1.2 Denise Annandale contacted the EAP after spotting a site poster to register as IAP and to obtain more information.</p> <p>1.3 She could not find the BAR at the Madibeng Library.</p>	<p>Denise Annandale Land owner Portion 1134</p>	<p>20 April 2018 Telephonic conversations with EAP.</p>	<p>Landowner contact details were updated.</p> <p>All IAP documentation was emailed and links to website for document downloads were sent via email and WhatsApp.</p> <p>No drilling planned for on this property.</p>
<p>1.4 Lynette Du Plessis contacted the EAP after spotting a site poster to register as IAP and to obtain more information.</p>	<p>Lynette Du Plessis Neighboring Landowner Portion 1150</p>	<p>04 May 2018 Telephonic conversations with EAP.</p>	<p>IAP registered.</p> <p>Documentation was emailed and links to website for document downloads were sent email and WhatsApp.</p>

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2 PREVIOUS MINING / DRILLING AND REHABILITATION			
2.1 Ms Tabane wanted to know who the drilling team would be as the previous drilling company had not cleaned up correctly.	Masentle Tabane Portion 1138	27/03/2018 Telephonic conversation	The drilling team is as yet unknown. Any concerns regarding rehabilitation of the old borehole should be submitted. A comment and reply sheet for this was sent to her. No comments were received. It was later confirmed that the previous prospecting right did not involve drilling on Ms Tabane's property. It is likely that the issues on her property relate to quarry activities and not prospecting for platinum group minerals.
2.2 Wished to know when the borehole would be drilled.			The IAP documentation outlines the prospecting process to be followed and timeframes. She will be consulted regarding access to the borehole in due course.
2.3 Borehole previously drilled on his portion to the south. Did not appear to have concern with its rehabilitation.	Marthinus Bruwer Portion 965	27/03/2018 Met on farm	No issues.
3 MINERAL RIGHTS			
3.1 Mr Bruwer indicated he has Mineral Rights to quarry dimension stone on his portion, and across the road.	Marthinus Bruwer Portion 965	27/03/2018 Met on farm	Noted. There will be no effect on his rights. IAP information sent.
3.2 Ms Tabane indicated that Pandora and Lonmin held the prospecting rights for her property.	Masentle Tabane Portion 1138	27/03/2018 Telephonic conversation	Ms Tabane was told that Team Core Investments 21 Pty Ltd was the applicant and that Pandora and Lonmin are not involved in this prospecting right application.

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4 PUBLIC PARTICIPATION PROCESS			
4.1 Did not know how BAR consultation process works, or that there were minerals in the area.	Timon Nyatsambo Portion 994	27/03/2018 Meeting on farm	Briefly explained that the start of the PPP was to identify interested and affected parties. Provided copy of site notice and sent IAP information that evening.
5 DRILLING			
5.1 Mr H Bruwer indicated that three of the boreholes are on portions he rents from the NPCA. He understands the process and is happy to work together.	Hendrik Bruwer Farms on 3 NPCA farms	29/3/2018 Telephonic conversation	Indicated that minerals were at least 1 km below surface with little impact during prospecting.
5.2 Mr Deale indicated that he understands the prospecting process. 5.3 He wished to know who the proponent is. The portion title deeds are in the names of his children.	John Deale Portion 1137 The portion title deeds are in the names of his children.	29/03/2018 Telephonic conversation	Mr Bruwer was added to the IAP list. Informed that the applicant is Team Core Investments 21 (Pty) Ltd. Sent IAP information to him.
5.4 What we are concerned about is if they use dinamite near our boreholes and it damages it in a way that we don't have any water. Who is going to carry the cost.	Ms Denise Annandale and Mr Charles Eglington	7/05/2018 eMail message	Concern about the use of dynamite: Prospecting are limited to drilling of four boreholes. There will be no blasting of any kind and thus no impact on water boreholes in the area.
6 CROPS			
6.1 The fields are currently under soya beans, harvested April/May. Then wheat is planted.	Hendrik Bruwer Farms on 3 NPCA farms	29/3/2018 Telephonic conversation	Noted. Information added to BAR report.

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7 WATER USES			
<p>7.1 It is noted on Page 13 that water will be sourced from the old abandoned quarries and existing boreholes and prospecting process will take place within 500m radius of the wetland. Therefore a water use authorisation must be lodged for in terms of section 21 (a) (c) and (i) of the National Water Act (Act 36 of 1998). Before any submission could be sent to the Department, it is mandatory for applicant to ensure that water use authorisation protocols are followed such as arranging a pre-consultation meeting with the Department, etc.</p> <p>7.2 It should also be noted that all water uses associated with the proposed activity must be identified, as defined in Section 21 of the National Water Act, 1998 (Act 36 of 1998) and the application for possible authorisation be submitted to this Department. No person may use water otherwise than as permitted under section 40 of the National Water Act, 1998.</p>	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Comment acknowledged. The BAR and EMP outlines what water use authorisations are needed and how the application process will be approached.
8 SEWERAGE DISPOSAL			
8.1 It is noted on Page 13 and 16 that chemical toilets facilities will be used on site during construction and operational phases of the project. Therefore, such facilities must be monitored and their content must be regularly emptied to be disposed of at the nearest licensed Wastewater Treatment Works, and proof of this must be provided on request.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Agreed. Adequately addressed in EMP.

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9 STORM WATER MANAGEMENT			
9.1 Storm water control measures must be implemented to divert clean water away from the site and keep contaminated water contained (where applicable). Therefore, Storm Water Management Plan must be drawn up, implemented and designed according to the Stormwater Management Plan guideline developed by the Department's Best Practice Guideline (GI) dated August 2006	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Due to the flat terrain and small scale of the planned activities, the EMP adequately provides for storm water management. An additional storm water management is unnecessary and will not be developed. No further plans to be submitted to the DWS. However, storm water will be addressed in the water use authorisation process and submissions will be made to DWS as part of this process, but only for activities requiring a water use authorisation.
10 WASTE MANAGEMENT			
10.1 It is noted on Page 13 that waste bins containers facilities will be provided on site. Such waste storage facilities must be regularly emptied and their contents must be disposed off at licensed landfill site and proof of safe disposal certificate must be provided on request	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Agreed. Adequately addressed in EMP.
11 SOIL EROSION			
11.1 It is noted on Page 37 that topsoil will be lost due to site clearance and disturbance at the drill sites. Therefore, adequate drainage and erosion protection in the form of cut-off berms or trenches should be provided where necessary.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Topsoil will not be lost. The area is flat and not prone to erosion. The EMP addresses small berms and trenches to be developed near water courses.

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12 HAZARDOUS WASTE SPILLAGE HANDLING			
12.1 It is noted on Page 13 that fuel and chemical storage facility will be present on site during construction and operational phases of the project Therefore, any fuel or chemical spillage which may occur during construction and operational phase must be immediately reported to the Department and clean up measures must be implemented.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	It is not practical or legally required for ALL spills to be reported to the DWS. However, where spills result in environmental degradation or pollution, these will be reported to DWS and DWS in terms of the requirements of the NEMA and NWA.
12.2 A spill contingency plan must be drafted and implemented and staff must be trained regarding to the implementation of the spill contingency plan	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	The EMP addresses spill management. No further plans are required due to low risk. A spill contingency plan will only be developed should fuel storage take place in the Regulated Area around water courses.
12.3 Any re-fueling of equipment should occur on a hardened surface, within a designated re-fueling area where any spills can be contained.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Agreed. Addressed in the EMP.
12.4 Soil contamination by hazardous substances such as oil, petrol or diesel must be removed from site and disposed-off in an environmentally-acceptable manner at a landfill site authorised to dispose off such waste.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Agreed. Addressed in the EMP.

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13 FLOODLINE			
13.1 Please ensure that the proposed activity comply with the following regulation. Your attention is drawn to Regulation 4(b) of regulation 704, dated 04 June 1999 which states that: No person in control of a mine or activity except in relation to a matter contemplated in regulation 10, carry on any underground or opencast mining, prospecting or any other operation or activity under or within the 1:50 year flood-line or within a horizontal distance of 100 metres from any watercourse or estuary, whichever is the greatest. The applicant is required to specify exactly what the distance is of the proposed activity from the water resource to ensure compliance with the stated regulation.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Agreed. Details of GN 704 incorporated into the BAR.
14 REHABILITATION PLAN			
14.1 It is stated on Page 37 that the disturbed area will be rehabilitated, detailed rehabilitation plan must be forwarded to the Department.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	The EMP addresses rehabilitation. No further plans are required due to low risk. A further rehabilitation plan will only be submitted to the DMS as part of any future water use authorisation processes.
15 STOCKPILED SOILS			
15.1 It is indicated on Page 38 that the site for BHPOI is located between two water courses. In this regard, no stockpiles of soils should be left in the riverbed	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Agreed. There will be no stockpiles in the riverbed. Addressed in EMP.
15.2 It is further indicated on Page 37 that top soil will be removed during construction phase and it will be stockpiled on site. Therefore, such material must be covered to protect wind erosion.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	The study area is not known for extreme winds. It is not necessary or practical to cover all soil stockpiles for wind protection.

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16 PUBLIC PARTICIPATION			
16.1 All the inputs/comments raised during the public participation process must be addressed adequately.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	This has been done where required. Not all comments received are practical and the EAPs applied their professional judgement and expertise to change the EMP where required.
16.2 It is responsibility of the applicant to ensure that all mitigation measures are in place during construction, operational and decommissioning phases to prevent surface and groundwater contamination.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Addressed in the EMP.
16.3 Notwithstanding the above, the responsibility rests with the applicant to identify any sources of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the National Water Act 1998 (Act 36 of 1998) could lead to legal action being instituted against the applicant.	Provincial Head: North West DWS	18/04/2018 Via email from Herbert Kutama	Addressed in the EMP.
17 HERITAGE RESOURCES			
17.1 Thank you for notifying North-West PHRA of the proposed development. Please note that SAHRA does not accept hardcopy, emailed, posted or website links as official submissions. Please ensure that a case is created on the South African Heritage Resources Information System (SAHRIS) and all relevant documents are uploaded to the application file. Please follow the step-by-step tutorial videos on the SAHRIS homepage (http://sahra.org.za/sahris/) and notify Ms Natasha Higgitt being Heritage Officer: Archaeology, Palaeontology and Meteorites Unit when this has been completed so that she may review the case and provide comments. Her contact details outlined as follows :Tel: +27 21 462 4502 Fax: +27 21 462 4509 Email:	Mr Motlhabane Mosiane Coordinator NWPBRA	04/05/2018 Via email from Mr Motlhabane Mosiane	Section 38 of the NHRA states that Heritage Impact Assessments are required for certain kinds of development including: Construction of a road, wall, powerline, pipeline, canal or other similar form of linear development or barrier over 300 m in length; Construction of a bridge or similar structure exceeding 50 m in length; Any development or activity that will change the character of a site a) exceeding 5 000 m ² in extent, b) involving three or more existing erven or subdivisions thereof, or c) involving three or more erven or divisions thereof which have been

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<p>nhiggitt@sahra.org.za 111 Harrington Street Cape Town.</p>			<p>consolidated within the past five years; and Rezoning of a site exceeding 10 000 m².</p> <p>None of the Section 38 activities are triggered. Planned access tracks are 125 m in length and will not be associated with grading and disturbance of the soil layers. The tracks will be created by driving over the veld and vegetation removal but grading and excavations are not envisaged. Total area of prospecting activities is ≤ 4000 m² of which only ~400 m² will be graded.</p> <p>Excavations will be limited to small sumps at each of the four drill sites and a geological borehole for removal of geological core. In the broader area, hundreds of such boreholes have already been drilled and the paleontological characteristics of the area is well known. The area is situated on underlying Precambrian igneous rocks of the Bushveld Igneous Complex. Paleontological resources are not associated with this underlying geology and as such it is unlikely that fossils will be affected by proposed prospecting activities.</p> <p>Three of the four drill sites (BHP02, BHP03 and BHP04) are located in agricultural fields where no surface heritage resources could be located due to the disturbance nature of the top soil layers. At fourth drill site (BHP01), there are no known and obvious signs of graves and other heritage features on surface. These features should be reasonably easy to spot due to the fact that there is no dense bush or grass on the site. However, it is remotely possible that heritage resources will be unearthed during clearing of the site. Measures to manage the discovery and</p>

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			<p>unearthing of graves and heritage artefacts are provided in the EMP.</p> <p>Upon request by SAHRA, the final basic assessment report was uploaded to the SAHRIS system.</p> <p>If required by SAHRA, a heritage assessment will be undertaken but this can only be done when the final positions for the drill sites and access tracks have been determined.</p>
<p>17.2 Ms Higgitt explained that all developments requiring an NEMA environmental authorisation needs to be registered with SAHRA and needs an assessment heritage resources.</p>	<p>Ms Natasha Higgitt SAHRA Heritage Officer: Archaeology, Palaeontology and Meteorites Unit</p>	<p>05/05/2018 Telecommunication with EAP</p>	<p>Upon request by SAHRA, the final basic assessment report was uploaded to the SAHRIS system.</p> <p>If required by SAHRA, a heritage assessment will be undertaken but this can only be done when the final positions for the drill sites and access tracks have been determined.</p>
<p>18 NOISE</p>			
<p>18.1 And if they are going to work 24/7, we are all working – the noise that they are going to make is going to be a problem</p>	<p>Ms Denise Annandale and Mr Charles Eglington</p>	<p>7/05/2018 eMail message</p>	<p>Concern about noise and 24/7 operations: Each prospecting borehole would take 3 to 4 months to drill, for 24 hours a day during those months. Noise impacts on any one household would be limited to 3 to 4 months. However, none of the boreholes are within 400 m of any dwelling. At that distance, one would be able to hear it at night but the noise would not be intrusive and if would not affect one's sleep.</p>

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19 SECURITY			
<p>19.1 If the people work near our farm and they walk through our place who is going to protect us. You know how big the problem is at this stage</p>	<p>Ms Denise Annandale and Mr Charles Eglington</p>	<p>7/05/2018 eMail message</p>	<p>For prospecting, site work by a geologist will be limited to one vehicle with 2 to 3 people. They will inform landowners before entering any private property.</p> <p>In addition to field reconnaissance visits by a geologist, site activities during prospecting will be limited to the drilling of four boreholes.</p> <p>Security is also a concern to the geologist visiting the area and the people working at the drill sites and would therefore be mutually beneficial to plan security arrangements with farmers / landowners. There will be security control at the drill sites. Movements of drilling personnel will be strictly controlled and they will not be allowed to leave the fenced drill site on foot. Vehicular movement will be controlled. The geologist and/or drilling contractor will meet with the landowners / farmers before drilling starts to discuss access to property and security matters. Farmers / landowners will thus know the people accessing their properties and will have input into security arrangements.</p> <p>I trust this will address your concerns, but please don't hesitate to inform us if you have any further questions or concerns.</p>