

APPENDIX B4: COMMENTS AND RESPONSES REPORT

ENVIRONMENTAL IMPACT ASSESSMENT FOR A PROSPECTING RIGHT APPLICATION FOR OFFSHORE SEA CONCESSIONS 14B, 15B & 17B: SCOPING REPORT

COMMENTS AND RESPONSES REPORT

The following Interested and Affected Parties (I&APs) submitted written comments on the draft Scoping Report for the proposed project, which was made available for public review and comment from 14 October to 13 November 2019.



Submitted by		Date	Method
1.	Cape West Coast Biosphere Reserve – Mona Nathan	15 October 2019	Email
2.	South African Heritage Resources Agency – Briege Williams	18 October 2019	Email
3.	Department of Environment, Forestry and Fisheries – Funani Ditinti	22 October 2019	Email
4.	South African Tuna Association – Clyde Bodenham	23 October 2019	Email
5.	Cederberg Municipality – Danné Joubert	29 October 2019	Email
6.	West Coast District Municipality – Estelle Bester	6 November 2019	Email
7.	West Coast District Municipality – Doretha Kotze	8 November 2019	Email
8.	Cederberg Municipality – Alyssa Summers	8 November 2019	Email
9.	West Coast Rock Lobster Association – Peter Foley	11 November 2019	Email
10.	CapeNature – Alana Duffell-Canham	13 November 2019	Email
11.	Department of Environmental Affairs & Development Planning – Adri La Meyer	13 November 2019	Email
12.	South African Pelagic Fishing Industry Association – Johann Augustyn	14 November 2019	Email


Copies of the written submissions are included in Attachment A.



The comments received are presented, and responded to, in Table 1 below. No importance should be given to the order in which the comments are presented. As far as possible, comments are presented verbatim from written submissions.


Table 1: Summary table of comments received, with responses from SLR and the project technical team, as appropriate


Note:  = Letter/Fax  = Telephone  = E-mail





NO.	ISSUE	NAME	METHOD	COMMENT	RESPONSE
1	CAPE WEST COAST BIOSPHERE RESERVE (CWCBR) – MONA NATHAN				
1.1	I&AP registration	Cape West Coast Biosphere Reserve – Mona Nathan	 15 October 2019	The Cape West Coast Biosphere Reserve (CWCBR), of the UNESCO: Man and Biosphere Program, aims to implement sustainable development principles along the West Coast, in addition to integrating rapid growth with biodiversity and heritage conservation. The CWCBR extends from the Diep River in the south to the Berg River in the north and inland to Malmesbury and therefore the proposed development is located within the CWCBR. In this regard, the CWCBR would like to register as an I&AP and receive further correspondence and documentation regarding this development.	This comment is noted. It is pointed out that the southern boundary Sea Concession 17B is located approximately 50 km north of the upper-most extent of the CWCBR (mouth of the Berg River). Thus, the proposed project falls well outside of the CWCBR.
2	SOUTH AFRICAN HERITAGE RESOURCES AGENCY (SAHRA) – MS. BRIEGE WILLIAMS				
2.1	Legislative Requirements	South African heritage Resources Agency – Brieg Williams	 18 October 2019	<p>The South African heritage Resources Agency (SAHRA) would like to thank you for submitting the draft Scoping Report for EIA for a prospecting right application of offshore seas concessions 14B, 15B and 17B, West Coast, South Africa.</p> <p>In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or objects may not be disturbed without a permit from the relevant heritage resources authority.</p>	This comment is noted.




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2.2	Requirements for specialist study	SAHRA – Briege Williams	 18 October 2019	<p>The prospecting activities described in the report are geophysical survey, drill sampling and bulk sampling. The geophysical survey is non-invasive and it is proposed that both a multibeam echosounder and sub-bottom profiler will be used. The drill sampling is invasive but has a relatively small footprint and it is proposed that a total area of 1.44 hectares will be sampled using this method. The bulk sampling activity will cause the most disturbance to the seabed, it is proposed that 10 trenches will be dug in each area meaning a total of approximately 10.8 hectares of the seabed will be excavated.</p> <p>The Draft Scoping Report has identified the need for a specialist study addressing the impact on underwater cultural heritage. The Underwater Heritage Impact Assessment will address the following issues:</p> <ul style="list-style-type: none"> • Undertake a desktop study of all known and suspected wrecks in the area; • Identify potential Maritime and Underwater Cultural Heritage sites in the area; • Recommend management measures for sites before and during development. <p>SAHRA looks forward to receiving the Maritime and Underwater Cultural Heritage Impact Assessment once it has been uploaded onto SAHRIS as part of the Draft EIA.</p>	<p>This comment is noted. As requested, the draft Environment Impact Report (EIR), including Maritime and Underwater Cultural Heritage Impact Assessment, will be uploaded onto the SAHRIS system once the draft EIR has been made available for public and authority review and comment.</p>
2.3	Process to be followed in the event of a discovery			<p>While there are no known shipwreck sites within the proposed prospecting areas there is always the potential for unknown wrecks or shipwreck material to be uncovered during the works. Should anything of archaeological or paleontological significance be exposed during the proposed project, work must cease immediately and SAHRA must be informed of its discovery without delay. In this event, work may not commence until feedback has been received</p>	


NO.	ISSUE	NAME	METHOD	COMMENT	RESPONSE
				from SAHRA. Should you have any further queries, please contact the designated official using the case number quoted above in the case header.	Programme (EMPr) to be included in the Draft EIR.
3	DEPARTMENT OF ENVIRONMENT, FORESTRY AND FISHERIES: OCEANS & COASTS – FUNANI DITINI				
3.1	Potential impact on the coastal zone	Department of Environment Forestry and Fisheries Branch Oceans & Coasts – Funani Ditini	  22 October 2019	This letter serves to acknowledge receipt of the Scoping Report for the Prospecting Right Application for proposed Offshore Prospecting Activities in Sea Concessions 14B, 15B and 17B, located off the West Coast of South Africa. The Department of Environment Forestry and Fisheries Branch Oceans & Coasts (DEFF: O&C) has reviewed the report in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) (“the ICM Act”) and notes that the activities associated with the proposed development will have an impact on the coastal zone.	This comment is noted.
3.2	I&AP registration			The DEFF: O&C appreciates the opportunity given to comment on this proposed project and will be providing comments during the next public participation phase of this application. The DEFF: O&C further requests to be registered as an I&AP.	The DEFF: O&C was included on the initial project database compiled during the commencement of the Scoping and EIA process.
3.3	Proof that comment has been forwarded to the competent authority			These comments must be sent to the competent authority for consideration and implementation, and the Environmental Assessment Practitioner (EAP) is advised to forward proof thereof to DEFF: O&C.	All submissions received during the Scoping process have been collated, and responded to, in this Comments and Responses Report and appended to the final Scoping Report submitted to the Department of Mineral Resources and Energy (DMRE) for consideration.
3.4	Future correspondence			Kindly note that the department reserves the right to revise our initial comments and we may request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office for the attention to the	The requested copies of the Draft EIR will be provided to DEFF: O&C once the document has been made available for public and authority review and comment.


NO.	ISSUE	NAME	METHOD	COMMENT	RESPONSE
				<p>Funanani Ditinti Directorate: Coastal Conservation Strategies using the following contact details: Physical Address: DEFF: O&C and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001. For further information, please don't hesitate to contact the following officials of the Branch OC responsible for Environmental Impact Assessments:</p> <p>a) Ms. Funanani Ditinti at fditinti@environment.gov.za b) Mr. Xolani Myanga at XMyanga@environment.gov.za; and c) Ms Nontsasa Tonjeni at ntonjeni@environment.gov.za</p>	
4	SOUTH AFRICAN TUNA ASSOCIATION (SATA) – MR. CLYDE BODENHAM				
4.1	Details of the South African Tuna Association	SATA – Clyde Bodenham	 23 October 2019	<p>I write in my capacity as President of the South African Tuna Association (SATA). Having been formed in 1985, SATA is the longest serving Industry Association formally recognised in terms of the Marine Living Resources Act. Our membership includes the vast majority of active tuna pole right holders in South Africa, all of whom are SMME vessel owners. Whilst small, our members provide much needed employment opportunities for well over 2 000 local fishers, with a combined investment in excess of R276 m. SATA's representation further extends the borders of South Africa, to various RFMO's such as the International Convention for the Conservation of Atlantic Tuna's (ICCAT). We have furthermore cemented our International position through membership with the International Pole and Line Foundation (IPNLF), established to further develop, support and promote socially and environmentally responsible pole-and-line tuna fisheries around the world. On the local front, SATA is represented in various Management Working Groups of the Department of Environment Affairs, Forestry and Fisheries as well as Fish SA.</p>	This comment is noted.



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4.2	Migration patterns of the South Atlantic Albacore	SATA – Clyde Bodenham	 23 October 2019	Our members, being restricted to economic opportunities through harvesting only the highly migratory South Atlantic Albacore species, are entirely dependent on the availability of this species during the months migration occurs through the South African Exclusive Economic Zone (EEZ). For your information South Atlantic Albacore migrate through the South African EEZ from Namibia waters, during the months of November through to May. Being a highly migratory and fast swimming species, large shoals of albacore are furthermore found sporadically within these historical migration months. We therefore have only a very short window of opportunity each year to access this specie, and are therefore naturally very concerned with both the area, and timing of your prospecting proposal.	<p>The concerns raised regarding the proposed location and timing of the proposed prospecting operations in relation to the migration patterns of the South Atlantic Albacore are noted.</p> <p>A fisheries impact assessment will be undertaken by an independent specialist as part of the EIA phase (refer to Section 6.2.3 of the Scoping Report for the Terms of Reference of this study). This assessment will consider all fishing sectors that operate within and adjacent to the Sea Concession areas that could be impacted by the proposed project.</p>
4.3	No baseline information regarding albacore species included in Scoping Report			We note further that the Belton Park Trading 127 (Pty) Ltd Scoping Report, in Part 5.2 fails to make any mention of albacore, in that it reads: <i>“The demersal fish species likely to be encountered in the general project area occupy waters of <100 m depth and include species such as various skate species, St Joseph, Houndshark, Soupfin shark, Tigar catshark and Bramble shark. Small pelagic species occurring beyond the surfzone and generally within the 200 m contour include the sardine/pilchard, anchovy, chub mackerel, horse mackerel and round herring.”</i>	Section 5.2 of the Executive Summary and Section 4.1.3.2.4 of the Scoping Report have been updated to include additional baseline information with respect to albacore species.
4.4	Impact of proposed project on tuna pole fishery and the international South Atlantic Albacore sharing			Whilst Part 6 of the above mentioned Report sets out the key project issues in so far as its potential impact on fishing, we are of the view that little to no consideration has been given towards the associated impacts on the migratory patterns of the South Atlantic Albacore, or its far reaching financial implications such decrease in fishing effort, will result in. South Africa is furthermore a party to an	This comment is noted.


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	arrangement			international South Atlantic Albacore sharing arrangement, as adopted at ICCAT. This sharing arrangement is due to be renegotiated at next year's Commission meeting. Our historical catch performance is therefore of paramount importance, to secure South Africa's portion of this international sharing arrangement. We therefore take a very serious view of any possible activity which may impede our attempts at these international negotiations, and of course adverse economic impacts our members may in turn be subjected to.	
4.5	I&AP Registration	SATA – Clyde Bodenham	 23 October 2019	In light of the above, SATA would like to request it be registered not only as an interested but participating party to the envisaged specialist studies, in so far as the fisheries assessments are concerned.	The project database has been updated to include SATA. In addition, further engagement with SATA will be undertaken, together with the fisheries specialist, during the EIA phase.
5	CEDERBERG MUNICIPALITY – DANNE JOUBERT				
5.1	I&AP registration	Cederberg Municipality – Danné Joubert	 29 October 2019	I would like to register on the project database for the EIA process for the offshore sea concessions project. If you can please add my email address to the database for this project.	The project database has been updated to include Danné Joubert.
6	WEST COAST DISTRICT MUNICIPALITY – ESTELLE BESTER				
6.1	Acknowledgement of receipt and I&AP registration	West Coast District Municipality – Estelle Bester	 6 November 2019	I hereby confirm receipt of your emails. I forwarded it to Ms. Doretha Kotze, City and Regional Planner of the West Coast District Municipality. You are welcome to contact her on 022 433 8523 or email her at dkotze@wcdm.co.za .	The project database has been updated to include Doretha Kotze.
7	WEST COAST DISTRICT MUNICIPALITY – DORETHA KOTZE				
7.1	Legislative requirements	West Coast District Municipality – Doretha Kotze	 8 November 2019	Your email of 11 October 2019 and the information pertaining to the draft Scoping Report for the proposed prospecting for offshore Sea Concessions 14B, 15B & 17B refer. Should any land based activities in support of this proposal be required in the West Coast District Municipal Area, the necessary authorisations should be obtained from the relevant local municipalities before commencement of any	It is pointed out that no intrusive land based prospecting activities would be undertaken as part of this project. Thus, no authorisation(s) from the Local Municipality will be required.


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				activities associated with the proposed prospecting.	
8	CEDERBERG MUNICIPALITY – ALYSSA SUMMERS				
8.1	Acknowledgement of receipt and I&AP registration	Cederberg Municipality – Alyssa Summers	 8 November 2019	Herewith acknowledgment of receipt of your email. The content is being forwarded to our Environmental Officer, Ms Danne Joubert / dannej@cederbergmun.gov.za / 027 482 8600.	This comment is noted. The project database has been updated to include Ms Danné Joubert.
9	WEST COAST ROCK LOBSTER ASSOCIATION (WCRLA) – PETER FOLEY				
9.1	Impact on rock lobster inshore fishing grounds	WCRLA – Peter Foley	 11 November 2019	The West Coast Rock Lobster Association (WCRLA) representing nearshore and offshore rights holders, who have been awarded fishing rights for fifteen years to catch lobster in Sea concessions 14B, 15B and 17B, located off the West Coast at Dorinbaai, Lamberts Bay and Elandsbaai. Our members are very concerned about the impact that the drill and bulk (trench) sampling activities will have on the west coast rock lobster inshore fishing grounds on their livelihoods.	This comment is noted. As noted in Section 4.2 above, a fisheries impact assessment will be undertaken as part of the EIA phase and will consider all fishing sectors that operate within and adjacent to the Sea Concession areas that could be impacted by the proposed project.
9.2	I&AP registration			We request that you keep us informed as an interested party.	The project database has been updated to include the WCRLA.
10	CAPENATURE – ALANA DUFFELL-CANHAM				
10.1	Scope of comments	CapeNature – Alana Duffell-Canham	 13 November 2019	CapeNature would like to thank you for the opportunity to comment on the Scoping Report for this application and wish to make the following comments. Please note that our comments pertain only to biodiversity related impacts and not to the overall desirability of the application.	This comment is noted.
10.2	Overview of proposed project			The application is to undertake offshore prospecting activities in Sea Concessions Area 14B, 15B and 17B, located off the West Coast of South Africa. The application proposes to undertake prospecting operations for various minerals within each of the Sea Concession Areas. The proposed prospecting operations would entail geophysical surveys, drill sampling and bulk (trench) sampling.	This information is correct.



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10.3	Location of Critical Biodiversity Areas	CapeNature – Alana Duffell-Canham	 13 November 2019	The National Biodiversity Assessment of 2018 indicates Concession Area 14B is classified as Namaqua Sandy Inner Shelf with a threat status of Least Concern. Concession Area 15B and 17B are classified as St Helena Bay ecosystem with a threat status of Vulnerable. According to the 2018 Critical Biodiversity Area (CBA) layer, all three concession areas contain irreplaceable CBA’s.	This comment is noted. Confirmation of the proposed prospecting operations in relation to these Critical Biodiversity Areas will be considered in the EIA phase.																																														
10.2	Location of the proposed project in relation to Lambert’s Bay Bird Island			<p>Concession Area 15B is less than 1 km from Lambert's Bay Bird Island. This is a provincial nature reserve which hosts the fourth largest breeding colony (approximately 8 500 breeding pairs) of Cape Gannet, which has a global IUCN threat status of Endangered (IUCN 2018). Other bird species of conservation concern found at Lambert’s Bay Bird Island can be seen in the table below:</p> <table><tr><th>English Name</th><th>Scientific Name</th><th>Global IUCN Category (IUCN 2011)</th><th>Regional IUCN Category</th></tr><tr><td>African Black Oystercatcher</td><td><i>Haematopus moquini</i></td><td>Near Threatened</td><td>Least Concern</td></tr><tr><td>African Penguin</td><td><i>Spheniscus demersus</i></td><td>Endangered</td><td>Endangered</td></tr><tr><td>Bank Cormorant</td><td><i>Phalacrocora neglectus</i></td><td>Endangered</td><td>Endangered</td></tr><tr><td>Cape Cormorant</td><td><i>Phalacrocorax capensis</i></td><td>Endangered</td><td>Endangered</td></tr><tr><td>Cape Gannet</td><td><i>Morus capensis</i></td><td>Vulnerable</td><td>Vulnerable</td></tr><tr><td>Caspian Tern</td><td><i>Sterna caspia</i></td><td>Least Concern</td><td>Vulnerable</td></tr><tr><td>Crowned Cormorant</td><td><i>Phalacrocorax coronatus</i></td><td>Near Threatened</td><td>Near Threatened</td></tr><tr><td>Great White Pelican</td><td><i>Pelecanus onocrotalus</i></td><td>Least Concern</td><td>Near Threatened</td></tr><tr><td>Greater Flamingo</td><td><i>Phoenicopterus ruber</i></td><td>Near Threatened</td><td>Least Concern</td></tr><tr><td>Lesser Flamingo</td><td><i>Phoenicopterus minor</i></td><td>Near Threatened</td><td>Near Threatened</td></tr><tr><td>Southern Giant-Petrel</td><td><i>Macronectes giganteus</i></td><td>Least Concern</td><td>Near Threatened</td></tr></table>	English Name	Scientific Name	Global IUCN Category (IUCN 2011)	Regional IUCN Category	African Black Oystercatcher	<i>Haematopus moquini</i>	Near Threatened	Least Concern	African Penguin	<i>Spheniscus demersus</i>	Endangered	Endangered	Bank Cormorant	<i>Phalacrocora neglectus</i>	Endangered	Endangered	Cape Cormorant	<i>Phalacrocorax capensis</i>	Endangered	Endangered	Cape Gannet	<i>Morus capensis</i>	Vulnerable	Vulnerable	Caspian Tern	<i>Sterna caspia</i>	Least Concern	Vulnerable	Crowned Cormorant	<i>Phalacrocorax coronatus</i>	Near Threatened	Near Threatened	Great White Pelican	<i>Pelecanus onocrotalus</i>	Least Concern	Near Threatened	Greater Flamingo	<i>Phoenicopterus ruber</i>	Near Threatened	Least Concern	Lesser Flamingo	<i>Phoenicopterus minor</i>	Near Threatened	Near Threatened	Southern Giant-Petrel	<i>Macronectes giganteus</i>	Least Concern
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10.3	Potential impact on benthic habitats and coastal birds	CapeNature – Alana Duffell-Canham	 13 November 2019	The potential impacts of drilling and trenching activities on the benthic habitats of Concession Areas 15B and 17B are concerning as the habitat is listed as Vulnerable and Contain irreplaceable CBA areas. These activities will have impacts on the ecosystem which could displace the prey sources of coastal birds on Lambert's Bay Bird Island.	The potential impact of the proposed prospecting operations on the identified benthic habitats, as well as the indirect impact on coastal birds, will be assessed in the EIA phase.
10.4	Location of the proposed prospecting operations in relation to Verloenvlei Estuary			The mouth of the Verloenvlei Estuary opens into the St Helena Bay, less than 1 km inshore of Concession Area 17B. The Verloenvlei Estuary was declared a RAMSAR site in 1991 which classifies it as a wetland of international importance. In 2013, the estuary was declared an Important Bird Area by BirdLifeSA.	This comment is noted.
10.5	Potential impact on eco-tourism			There may be potential negative impacts on eco-tourism activities if birds are displaced from the island owing to food displacement or disturbance from the prospecting vessels.	The potential impact on birds will be assessed as part of the marine faunal assessment to be undertaken (by an independent specialist) as part of the EIA phase (refer to Section 6.2.2 of the Scoping Report for the Terms of Reference of this study).
10.6	Potential impact on Cape Gannet and African Penguin			<p>The specialist faunal study must address possible impacts on Cape Gannet and African Penguin, directly (possible oiling and slick contamination, birds displacing due to disturbance by vessels) but also indirectly; the potential effects on their prey source.</p> <p>The specialist study must also include the potential impacts on the Verloenvlei Estuary not only as an important bird area but also for estuarine dependent fish species that may be negatively impacted by the prospecting activities.</p>	This comment is noted. These impacts will be considered as part of the marine fauna assessment to be undertaken as part of the EIA phase.
10.7	Objection			Based on the current information available and the points above, CapeNature objects to this application. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.	This objection is noted and is recorded here for consideration by DMRE.

NO.	ISSUE	NAME	METHOD	COMMENT	RESPONSE
11	DEPARTMENT OF ENVIRONMENTAL AFFAIRS & DEVELOPMENT PLANNING (DEA&DP) – ADRI LA MEYER				
11.1	Consolidated comment from DEA&DP	DEA&DP – Adri La Meyer	 13 November 2019	<p>The correspondence of 11 October 2019 requesting comments on the Draft Scoping Report (“DSR”) which was received by the Department on 14 October 2019 refers. Please find the Department’s consolidated comment on the DSR and Plan of Study for Environmental Impact Assessment (“EIA”) dated October 2019. The Department reserves the right to revise or withdraw its comments and request further information based on new information received. Please direct any enquiry to the official(s) indicated in this correspondence should you require any clarity on any of the comments provided.</p>	This comment is noted.
11.2					
11.3	Public participation process	DEA&DP: Development Management – Natasha Bieding	 13 November 2019	Regulation 41(6) of the EIA Regulations, 2014 (as amended) requires that participation by potential or registered interested and affected parties (“I&APs”) should be facilitated in such a manner that all potential or registered I&APs are provided with a reasonable opportunity to comment on the application. In view of the nature and potential impacts of the proposed prospecting operations on coastal communities, it is recommended that if so requested by local communities or organisations, interactive consultation sessions be held during the EIA phase, which could include meetings or open days to explain the development proposal and potential impacts and mitigation measures.	This comment is noted. Where requested, interactive consultation sessions will be held with local communities and / or organisations during the EIA phase.
11.4	Environmental sensitivity map			An environmental sensitivity map indicating environmental sensitive areas and features that will be impacted upon, and a final layout map overlain on the environmental sensitivity map, indicating how the sensitive areas and features will be avoided, should be included in the Draft EIA Report.	The requested environmental sensitivity map will be included in the draft EIR.
11.5	Need and desirability			The need and desirability of the proposed prospecting operations in the context of other prospecting and mining activities in the proposed sea shore concessions must be elaborated on in the Draft EIA Report. The Draft EIA Report must further indicate whether the proposed prospecting operations are aligned to any of the six focus areas of Operation Phakisa.	This comment is noted. The need and desirability for the proposed project will be updated in the EIR and will include reference to the focus areas of Operation Phakisa.

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11.6	Mitigation measures to be included in Marine Fauna study	DEA&DP: Development Management – Natasha Bieding	 13 November 2019	The Marine Fauna specialist study must provide avoidance and mitigation measures related to the preferred season for undertaking of prospecting operations to avoid or limit impacts to local marine fauna. These avoidance and mitigation measures must be provided for the undertaking of the various phases of the proposed prospecting, i.e. for geophysical surveys, drill sampling, and bulk (trench) sampling.	The Terms of Reference for the marine fauna assessment is provided in Section 6.2.2 of the Scoping Report. In this regard it is noted that the study must “ <i>identify practicable mitigation measures to avoid/reduce any negative impacts and indicate how these could be implemented in the start-up and management of the proposed project</i> ”.
11.7				Based on the findings of the various specialist studies, the Draft EIA Report must provide an indication of the anticipated months or season that geophysical surveys and drill sampling (four days per year per concession area over a four-year period) and bulk sampling (four days per year per concession area over a two-year period) will occur.	These measures will also include recommendations with respect to the proposed timing of the planned prospecting operations.
11.8	Target minerals			Section 3.1.3, page 21 of the DSR provides a list of minerals targeted for the proposed prospecting operations. However, other sections of the DSR only refer to prospecting for diamonds. Please ensure that the target minerals are consistently referred to in future documents of this application.	The final Scoping Report has been updated, where applicable, to make reference to all the target minerals.
11.9	Indication of locations where proposed prospecting operations will be undertaken			Please further indicate whether different zones in each concession area will be subjected to geophysical surveys, drill sampling and bulk sampling during the duration of the validity of the prospecting right.	Additional detail on the planned target areas for the proposed prospecting activities will be provided in the draft EIR.
11.10	Indication of approximate depth of trenches to be excavated during bulk sampling			The approximate depth of the trench/es to be excavated during bulk sampling should be included in any future reports (assuming to be at depths of up to 200 m below sea level – please confirm?).	This information will be included in the Draft EIR.

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11.11	Applicability of the National Environmental Management: Waste Act, 2008 (No. 59 of 2008)	DEA&DP: Waste Management – Helena Bouwer	 13 November 2019	It is noted that the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) is not applicable to offshore activities. As such, a Waste Management Licence (WML) would not be required for offshore waste management activities, such as the treatment of waste.	Section 2.1.4 of the final Scoping Report states that a WML would not be required for offshore waste management activities.
11.12	Inclusion of International Convention for the Prevention of Pollution from Ships, 197/1978 in the EMPr			If possible, the relevant requirements/annexures of the International Convention for the Prevention of Pollution from Ships, 197/1978 related to discharges to sea, should be included in the Environmental Management Programme (“EMPr”).	This will be considered when compiling the EMPr for the proposed project.
11.13	Treatment and disposal of hazardous waste			Any waste material, including healthcare risk waste generated on shipping vessels and brought onshore within the Western Cape Province, must only be treated and / or disposed of at a registered healthcare risk waste treatment facility and / or licenced waste disposal facility. The temporary storage of waste on land may not exceed a period longer than 90 days.	These comments are noted. Management measures for the handling and disposal of waste will be included in the EMPr.
11.14	Separation of general and hazardous waste			Please note that general and hazardous waste generated must always be separated as the mixing of these two waste types will result in the entire volume of waste being classified as hazardous waste.	
11.15	Rehabilitation, closure and ongoing post-decommissioning activities associated with the project			The Draft EIA Report and EMPr must provide a description of the rehabilitation, closure and ongoing post-decommissioning activities associated with the proposed prospecting operations.	This comment is noted.

NO.	ISSUE	NAME	METHOD	COMMENT	RESPONSE
12	SOUTH AFRICAN PELAGIC FISHING INDUSTRY ASSOCIATION (SAPFIA) – JOHANN AUGUSTYN				
12.1	I&AP registration	South African Pelagic Fishing Industry Association – Johan Augustyn	  14 November 2019	On behalf of SAPFIA (South African Pelagic Fishing Industry Association), we would like to register as an affected party and our concerns addressed in the EIA. If there are therefore any workshops held, we would like to be invited.	Representatives of SAPFIA was included on the initial project database compiled during the commencement of the Scoping and EIA process. Mr Johann Augustyn has also been added to the proposed project database.

ATTACHMENT A
WRITTEN COMMENTS

From: [Hub](#)
To: [Candice Sadan](#)
Cc: "[Lizelle Koen](#)"; halvorsenmartinh@gmail.com; "[Hedwig Slabig](#)"
Subject: OMGEWINGSINPAKSTUDIEPROSES VIR PROSPEKTERINGSREGAANSOEKE VIR AFLANDIGE DIAMANTE IN SEEKONSESSIES 14B, 15B EN 17B, WESKUS, SUID-AFRIKA DMRE Verwysings:WC30/5/1/1/2/10311PR; WC30/5/1/1/2/10312PR; en WC30/5/1/1/2/10313PR
Date: 15 October 2019 10:27:12 AM
Attachments: [image005.png](#)

Good day Ms Candice Sadan

The Cape West Coast Biosphere Reserve (CWCBR), of the UNESCO: Man and Biosphere Program, aims to implement sustainable development principles along the West Coast, in addition to integrating rapid growth with biodiversity and heritage conservation. The CWCBR extends from the Diep River in the south to the Berg River in the north and inland to Malmesbury and therefore the proposed development is located within the CWCBR. In this regard, the CWCBR would like to register as an I& AP and receive further correspondence and documentation regarding this development.

Kindly acknowledge receipt of this email.

Kind Regards

Mona Nathan



OFFICE ADMINISTRATOR

info@capebiosphere.co.za

083 708 4007

cnr. R27 & R315, Yzerfontein, P.O Box 283, Darling, 7345

Tel: 022 125 0049 / 083 708 4007 | Fax: 086 662 6818

www.capebiosphere.co.za



Virus-free. www.avast.com

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Briege Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za
CaseID: 14450

Date: Friday October 18, 2019
Page No: 1

Interim Comment

In terms of Section 38 of the National Heritage Resources Act (Act 25 of 1999)

Attention: SLR Consulting (South Africa) (Pty) Ltd

EIA FOR A PROSPECTING RIGHT APPLICATION FOR OFFSHORE SEA CONCESSIONS 14B, 15B & 17B, WEST COAST

The South African Heritage Resources Agency (SAHRA) would like to thank you for submitting the Draft Scoping Report for and EIA for a prospecting right application of offshore sea concessions 14B, 15B and 17B, West Coast, South Africa.

In terms of the National Heritage Resources Act, No 25 of 1999 (NHRA), Sections 2 and 35 stipulates that any wreck, being any vessel or aircraft or any part thereof older than 60 years old lying in South Africa's territorial waters or maritime cultural zone is protected and falls under the jurisdiction of SAHRA's Maritime and Underwater Cultural Heritage Unit. These heritage sites or objects may not be disturbed without a permit from the relevant heritage resources authority.

The prospecting activities described in the report are geophysical survey, drill sampling and bulk sampling. The geophysical survey is non-invasive and it is proposed that both a multibeam echosounder and sub-bottom profiler will be used. The drill sampling is invasive but has a relatively small footprint and it is proposed that a total area of 1.44 hectares will be sampled using this method. The bulk sampling activity will cause the most disturbance to the seabed, it is proposed that 10 trenches will be dug in each area meaning a total of approximately 10.8 hectares of the seabed will be excavated.

The Draft Scoping Report has identified the need for a specialist study addressing the impact on underwater cultural heritage. The Underwater Heritage Impact Assessment will address the following issues.

- Undertake a desktop study of all known and suspected wrecks in the area;
- Identify potential Maritime and Underwater Cultural Heritage sites in the area;
- Recommend management measures for sites before and during development.

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
www.sahra.org.za

Enquiries: Briege Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za
CaseID: 14450

Date: Friday October 18, 2019
Page No: 2

SAHRA looks forward to receiving the Maritime and Underwater Cultural Heritage Impact Assessment once it has been uploaded onto SAHRIS as part of the Draft EIA.

While there are no known shipwreck sites within the proposed prospecting areas there is always the potential for unknown wrecks or shipwreck material to be uncovered during the works. Should anything of archaeological or paleontological significance be exposed during the proposed project, work must cease immediately and SAHRA must be informed of its discovery without delay. In this event, work may not commence until feedback has been received from SAHRA.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Briege Williams
Heritage Officer
South African Heritage Resources Agency

Lesla la Grange
Manager: Maritime and Underwater Cultural Heritage
South African Heritage Resources Agency

ADMIN:

Our Ref:



an agency of the
Department of Arts and Culture

T: +27 21 462 4502 | F: +27 21 462 4509 | E: info@sahra.org.za
South African Heritage Resources Agency | 111 Harrington Street | Cape Town
P.O. Box 4637 | Cape Town | 8001
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Enquiries: Briege Williams
Tel: 021 462 4502
Email: bwilliams@sahra.org.za
CaseID: 14450

Date: Friday October 18, 2019
Page No: 3

Direct URL to case: <http://www.sahra.org.za/node/530220>

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.

From: [Funanani Dintini](#)
To: [Candice Sadan](#)
Cc: [Nicholas Arnott](#); [Xolani Myanga](#); [Thandeka Mbambo](#)
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Date: 22 October 2019 02:00:01 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[Proposed Prospecting Right Application for proposed Offshore Prospecting....pdf](#)

Goo day Candice

Kind find attached response letter in regard to the proposed Prospecting Right Application for proposed Offshore Prospecting Activities In Sea Concessions 14b, 15b And 17b

I hope you find the above in order, and looking forward to your positive response.

Ahhhhhhhh!!!! Ndia Livhuwa :)

Kind Regards
Funanani Dintini

Department of Environment Affairs (DEA)
Branch: Oceans and Coast
Directorate: Coastal Conservation and Strategies

Tel: +27-21 819 2499
Fax: +27-21 819 2445
(Physical address)
East Pier Building
East Pair Road
Victoria and Alfred Waterfront
Cape Town
8000

From: Candice Sadan [mailto:csadan@slrconsulting.com]
Sent: Friday, October 11, 2019 4:37 PM
To: Candice Sadan
Cc: Nicholas Arnott
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Dear Interested and/or Affected Party

The attached correspondence provides information regarding the availability of a draft Scoping Report for review and comment in accordance with the EIA Regulations, 2014 (as amended). Should you and / or your organisation wish to comment on the Scoping Report for the proposed project, such comments should be sent to our Ms Candice Sadan (at the details below) by no later than 13 November 2019. For more information, please refer to the attached letter and copy of the Executive Summary of the draft Scoping Report.

Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned.

SLR Consulting (South Africa) (Pty) Ltd
Attention: Ms Candice Sadan
PO Box 10145, CALEDON SQUARE, 7905
Tel: (021) 461 1118/9
E-mail: csadan@slrconsulting.com

Yours sincerely



Candice Sadan
Office Administrator

+27 21 461 1118
csadan@slrconsulting.com

SLR Consulting
SLR Consulting (Cape Town office)
Unit 39, Roeland Square
Cnr Roeland Street and Drury Lane, Cape Town, Western Cape, 8001



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'Please consider the environment before you print this email'
'Please consider the environment before you print this email'

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environmental affairs

Department:
Environmental Affairs
REPUBLIC OF SOUTH AFRICA

Enquiries: Funanani Ditinti

Tel: (+27 21) 819 2499/ **Fax:** (+27 21) 819 2445 **E-mail:** fditinti@environment.gov.za

SLR Consulting (South Africa) (Pty) Ltd

Ms Candice Sadan

P O Box 10145

CALEDON QUARE

7905

Tel: 021 461 1118/9 / **Email:** csdan@slrconsulting.com

Dear Ms Candice Sadan

SUBJECT: COMMENTS ON THE SCOPING REPORT FOR THE PROPOSED PROSPECTING RIGHT APPLICATION FOR PROPOSED OFFSHORE PROSPECTING ACTIVITIES IN SEA CONCESSIONS 14B, 15B AND 17B, LOCATED OFF THE WEST COAST OF SOUTH AFRICA.

This letter serves to acknowledge receipt of the Scoping Report for the proposed Prospecting Right Application for proposed Offshore Prospecting Activities In Sea Concessions 14b, 15b And 17b, Located Off The West Coast Of South Africa. The Department of Environment Forestry and Fisheries Branch Oceans & Coasts (DEFF: O&C) has reviewed the report in terms of the National Environmental Management: Integrated Coastal Management Act, 2008 (Act No. 24 of 2008) ("the ICM Act") and notes that the activities associated with the proposed development will have an impact on the coastal zone.

The DEA: O&C appreciates the opportunity given to comment on this proposed project and will be providing comments during the next public participation phase of this application. The DEA: O&C further requests to be registered as an I&AP.

These comments must be sent to the competent authority for consideration and implementation, and the EAP is advised to forward the Branch OC the proof.

Kindly note that the department reserves the right to revise our initial comments and we may request further information based on any additional information that might be received. All future correspondence and documentation (hard copy and an electronic copy) must be submitted to our office for the attention to the Funanani Ditinti Directorate: Coastal Conservation Strategies using the following contact details: **Physical Address: Department of Environment Forestry and Fisheries (DEFF), Branch: Oceans and Coast, 2 East Pier Building, East Pier Road, Victoria and Alfred Waterfront, Cape Town, 8001.** For further information, please don't hesitate to contact the following officials of the Branch OC responsible for Environmental Impact Assessments:

- a) Ms. Funanani Ditinti at fditinti@environment.gov.za
- b) Mr. Xolani Myanga at XMyanga@environment.gov.za; and
- c) Ms Nontsasa Tonjeni at ntonjeni@environment.gov.za

From: [Clyde Bodenham](#)
To: [Candice Sadan](#)
Cc: [Nicholas Arnott](#); [The South African Tuna Association](#)
Subject: Re: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Date: 23 October 2019 02:55:55 PM

Dear Ms Sadan

I write in my capacity as President of the South African Tuna Association (SATA).

Having been formed in 1985, SATA is the longest serving Industry Association formally Recognised in terms of the Marine Living Resources Act. Our membership includes the vast majority of active tuna pole Right Holders in South Africa, all of whom are SMME vessel owners. Whilst small, our members provide much needed employment opportunities for well over 2000 local fishers, with a combined investment in excess of R276m. SATA's representation further extends the borders of South Africa, to various RFMO's such as the International Convention for the Conservation of Atlantic Tuna's (ICCAT). We have furthermore cemented our International position through membership with the International Pole and Line Foundation (IPNLF), established to further develop, support and promote socially and environmentally responsible pole-and-line tuna fisheries around the world. On the local front, SATA is represented in various Management Working Groups of the Department of Environment Affairs, Forestry and Fisheries as well as Fish SA.

Our members, being restricted to economic opportunities through harvesting only the highly migratory South Atlantic Albacore specie, are entirely dependant on the availability of this species during the months migration occurs through the South African EEZ. For your information South Atlantic Albacore migrate through the South African EEZ from Namibia waters, during the months of November through to May. Being a highly migratory and fast swimming specie, large shoals of albacore are furthermore found sporadically within these historical migration months. We therefore have only a very short window of opportunity each year to access this specie, and are therefore naturally very concerned with both the area, and timing of your prospecting proposal.

We note further that the Belton Park Trading 127 (Pty) Ltd Scoping Report, in Part 5.2 fails to make any mention of albacore, in that it reads;

The demersal fish species likely to be encountered in the general project area occupy waters of <100 m depth and include species such as various skate species, St Joseph, Houndshark, Soupfin shark, Tiger catshark and Bramble shark. Small pelagic species occurring beyond the surfzone and generally within the 200 m contour include the sardine/pilchard, anchovy, chub mackerel, horse mackerel and round herring.

Whilst Part 6 of the above mentioned Report sets out the key project issues in so far as its potential impact on fishing, we are of the view that little to no consideration has been given towards the associated impacts on the migratory patterns of the South Atlantic Albacore, or its far reaching financial implications such decrease in fishing effort, will result in. South Africa is furthermore a party to an international South Atlantic Albacore sharing arrangement, as adopted at ICCAT. This sharing arrangement is due to be renegotiated at next years Commission meeting. Our historical catch performance is therefore of paramount importance, to secure South Africa's portion of this international sharing

arrangement. We therefore take a very serious view of any possible activity which may impede our attempts at these international negotiations, and of course adverse economic impacts our members may in turn be subjected to.

In light of the above, SATA would like to request it be registered **not only** as an interested but **participating party** to the envisaged Specialists Studies, in so far as the fisheries assessments are concerned.

Warm Regards

Clyde Bodenham
President
South African Tuna Association
Unit 25, Foregate Square, Heerengracht Street, Foreshore, 8000
Ph: +27 21 4182696
Fax: +27 21 4182689
Mobile: 082 4455357
[Email: clyde@molimoman.co.za](mailto:clyde@molimoman.co.za)
Direct Fax: 0865793370

* Sent from my MacBook Pro

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On 11 Oct 2019, at 16:36, Candice Sadan
<csadan@slrconsulting.com> wrote:

Dear Interested and/or Affected Party

The attached correspondence provides information regarding the availability of a draft Scoping Report for review and comment in accordance with the EIA Regulations, 2014 (as amended). Should you and / or your organisation wish to comment on the Scoping Report for the proposed project, such comments should be sent to our Ms Candice Sadan (at the details below) by no later than 13 November 2019. For more information, please refer to the attached letter and copy of the Executive Summary of the draft Scoping Report.

Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned.

<image001.png>

Yours sincerely

<image0eeffa.JPG>

Candice Sadan
Office Administrator

<image44e1da.PNG> +27 21 461 1118

<image52d80f.PNG> csadan@slrconsulting.com

SLR Consulting
SLR Consulting (Cape Town office)
Unit 39, Roeland Square
Cnr Roeland Street and Drury Lane, Cape Town, Western Cape, 8001

<image413707.PNG>

[<image5430f7.PNG>](#) [<image7646f4.PNG>](#) [<image958d12.PNG>](#)

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<2019-10-11_IMD05_DSR Notification.pdf> <2019-10-10_IMD05_Executive Summary_Rev0.pdf>

From: [Danne Joubert](#)
To: [Candice Sadan](#)
Subject: Register on Project database
Date: 29 October 2019 11:13:54 AM
Attachments: [image001.png](#)
[20191021081752852.pdf](#)

Good day Candice Sadan

I would like to register on the project database for the EIA process for the Offshore Sea concessions project. If you can please add my email address to the database for this project.

Thank you

Kind regards

Danné Joubert
Environmental Officer
Integrated Development Services
Email: dannej@cederbergmun.gov.za
Tel: (+27) 27 482 8600
Cell : (+27) 72 443 6623
Fax: (+27) 27 482 1369
Private Bag x2, Clanwilliam, 8135





11 October 2019

CEDERBERG LOCAL MUNICIPALITY

Municipal Manager
2A Voortrekker Road
CLANWILLIAM
8135

ATTENTION: MR LOUIS VOLSCHENK

Dear Mr Louis Volschenk

MUNISIPALITEIT CEDERBERG					
LEER NR	12/2/3/13	ONTVANGS ERKEN			
VERWYS NA	KEN	KOM	AFH	BESK	BERG
L. Volschenk	X				
A. Breyer	X	X	X		
J. Gouber	X	X	X		

RECORDS



BELTON PARK TRADING 127 (PTY) LTD – ENVIRONMENTAL IMPACT ASSESSMENT FOR A PROSPECTING RIGHT APPLICATION FOR OFFSHORE SEA CONCESSIONS 14B, 15B & 17B, WEST COAST (DMRE REFERENCE: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): NOTIFICATION OF PUBLIC PARTICIPATION PROCESS IN TERMS OF NEMA EIA REGULATIONS, 2014 (AS AMENDED) AND AVAILABILITY OF SCOPING REPORT FOR COMMENT

This letter provides information regarding a Scoping and Environmental Impact Assessment (EIA) process and notification of the availability for comment of the Scoping Report prepared for the above-mentioned project.

On 4 October 2019, Belton Park Trading 127 (Pty) Ltd (BPT127) submitted an application for a Prospecting Right with the Department of Mineral Resources and Energy (DMRE) to undertake offshore prospecting activities in Sea Concessions 14B, 15B and 17B, located off the West Coast of South Africa. The application was lodged in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002) (MPRDA) (as amended). The proposed prospecting operations for various minerals (specifically diamond, gemstones, heavy minerals, industrial mineral, precious metals, ferrous and base metals) would entail: (i) geophysical surveys; (ii) drill sampling; and (iii) bulk (trench) sampling.

Sea Concessions 14B, 15B and 17B are situated approximately 180 km north of Cape Town, with the inshore boundaries located 1 km seaward of the coast between Elands Bay to the south and Strandfontein approximately 6 km to the north.

BPT127 has appointed SLR Consulting (Pty) Ltd (SLR) as the independent environmental assessment practitioner to undertake a Scoping and EIA process in terms of the EIA Regulations, 2014 (as amended) for the above-mentioned proposed project.

2/...



SLR Consulting (South Africa) (Proprietary) Limited

Registered Address: Unit 7, Fourways Manor Office Park,
1 Macbeth Avenue, Fourways, 2191
Postal Address: PO Box 1596, Cramerville, 2060, South Africa

Reg. No: 2007/005517/07
Vat No: 4630242198

Directors: R Hounscome, F Fredericks, D Jinak

Fourways Office: Physical Address: Unit 7 & 9, Fourways Manor Office Park, 1 Macbeth Avenue, Fourways
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Cape Town Office: Physical Address: Unit 39, Roeland Square, 30 Drury Lane, Cape Town
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Somerset West Office: Unit D3, Building 5, Fairways Office Park, Niblick Way, Somerset West
☎+27 21 851 3348

slrconsulting.com

In accordance with the EIA Regulations, 2014 (as amended), you and / or your organisation are hereby invited to register as an Interested and Affected Party (I&AP) for the proposed project and / or comment on the Scoping Report for the proposed project. The Scoping Report has been made available for a 30-day public and authority review and comment period from **14 October to 13 November 2019**.

An electronic copy of the Scoping Report (on USB) is enclosed for your reference. If you and / or your organisation would like to register on the project database, comment on the proposed project and / or if you know of any other stakeholders interested in, or affected by, the proposed project please submit such comments and / or information to our Ms. Candice Sadan (at the details below) **by no later than 13 November 2019**.

SLR Consulting (South Africa) (Pty) Ltd

Attention: Ms Candice Sadan

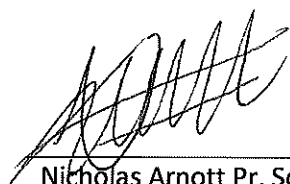
PO Box 10145, CALEDON SQUARE, 7905

Tel: (021) 461 1118/9

E-mail: csadan@slrconsulting.com

Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned (narnott@slrconsulting.com).

Yours sincerely



Nicholas Arnott Pr. Sci. Nat.

Senior Environmental Consultant

SLR Consulting (South Africa) (Pty) Ltd

Encl.



ACKNOWLEDGEMENT OF RECEIPT

BELTON PARK TRADING 127 (PTY) LTD – ENVIRONMENTAL IMPACT ASSESSMENT FOR A PROSPECTING RIGHT APPLICATION FOR OFFSHORE SEA CONCESSIONS 14B, 15B & 17B, WEST COAST (DMRE REFERENCE: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): NOTIFICATION OF PUBLIC PARTICIPATION PROCESS IN TERMS OF NEMA EIA REGULATIONS, 2014 (AS AMENDED) AND AVAILABILITY OF SCOPING REPORT FOR COMMENT

Name of recipient:

MR LOUIS VOLSCHENK

Address of recipient:

2A VOORTREKKER ROAD, CLANWILLIAM

Contents:

1 X COVER LETTER AND 1 X ELECTRONIC COPY OF SCOPING REPORT (USB)

**Received by (print name): _____ for
CEDERBERG LOCAL MUNICIPALITY**

Signature: _____

Date: _____

Company Stamp

Project number: IMD05 – 720.09017.00005



SLR Consulting (South Africa) (Proprietary) Limited

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Postal Address: PO Box 1596, Cramerview, 2060, South Africa

Reg. No: 2007/005517/07
Vat No: 4630242198

Directors: R Hounscome, F Fredericks, D Junak

Fourways Office: Physical Address: Unit 7 & 9, Fourways Manor Office Park, 1 Macbeth Avenue, Fourways
Postal Address: PO Box 1596, Cramerview, 2060 ☎+27 11 467 0945 ☎+27 11 467 0978

Cape Town Office: Physical Address: Unit 39, Roeland Square, 30 Drury Lane, Cape Town
Postal Address: PO Box 10145, Caledon Square, 7905 ☎+27 21 461 1118 ☎+27 21 461 1120

Somerset West Office: Unit D3, Building 5, Fairways Office Park, Niblick Way, Somerset West
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☎ slrconsulting.com

EXECUTIVE SUMMARY

1. INTRODUCTION

On 4 October 2019 Belton Park Trading 127 (Pty) Ltd (BPT127) lodged an application for a Prospecting Right with the Department of Mineral Resources and Energy (DMRE) to undertake offshore prospecting activities in Sea Concessions 14B, 15B and 17B, located off the West Coast of South Africa. The application was lodged in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (No. 28 of 2002) (MPRDA), as amended.

Sea Concessions 14B, 15B and 17B are situated approximately 180 km north of Cape Town, with the inshore boundaries located 1 km seaward of the coast between Elands Bay to the south and Strandfontein to the north (see Figure 1).

BPT127 proposes to undertake prospecting operations for various minerals (specifically diamond, gemstones, heavy minerals, industrial minerals, precious metals, ferrous and base metals) within each of the Sea Concession areas. The proposed prospecting operations would entail geophysical surveys, drill sampling and bulk (trench) sampling.

For the geophysical surveys, the total line kilometres to be surveyed per concession would be between 600 and 1 200 km. The total footprint of disturbance associated with the drill sampling and bulk (trench) sampling would be approximately 12.24 ha in total. The duration of each exploration activity would be four days per annum in each concession area.

The proposed prospecting activities require Environmental Authorisation (EA) in terms of the National Environmental Management Act, 1998 (No. 107 of 1998) (NEMA), as amended and a Prospecting Right has to be obtained in terms of the MPRDA. A requirement for obtaining a Prospecting Right is that an applicant must comply with Chapter 5 of NEMA with regards to consultation and reporting. In this regard, an application for EA is also required. In order for DMRE to consider an application for EA for the proposed prospecting operations, a Scoping and Environmental Impact Assessment (EIA) process must be undertaken.

SLR Consulting (South Africa) (Pty) Ltd (SLR) has been appointed by BPT127 as the independent environmental assessment practitioner to undertake the EIA process. SLR is required to ensure that the EIA meets the relevant requirements of the NEMA and the EIA Regulations 2014, as amended.

2. OPPORTUNITY TO COMMENT

This Scoping Report has been distributed for a 30-day comment period from **14 October to 13 November 2019** in order to provide interested and affected parties (I&APs) with an opportunity to comment on any aspect of the proposed project and the findings of the EIA project to date. Copies of the full report have been made available on the SLR website (at <https://slrconsulting.com/za/slr-documents/>) and at the offices of SLR.

Any comments should be forwarded to SLR at the address, telephone or e-mail addresses shown below. For comments to be included in the updated Scoping Report, comments should reach SLR by no later than **13 November 2019**.

Ms. Candice Sadan
SLR Consulting (South Africa) (Pty) Ltd
PO Box 10145, Caledon Square, 7905
Tel: (021) 461 1118 / 9
E-mail: csadan@slrconsulting.com

3. SCOPING AND EIA PROCESS

The key steps in the Scoping and EIA process are described below.

3.1. SCOPING PHASE

3.1.1. Application for Environmental Authorisation

An "Application Form for Environmental Authorisation" form was submitted to DMRE at the same time as the Prospect Right application was submitted (on 4 October 2019).

3.1.2. Compilation and review of the Scoping Report

This draft version of the Scoping Report has been prepared in compliance with Appendix 2 of the EIA Regulations 2014 (as amended). This report provides an opportunity for I&APs to comment on the proposed project and the scope of work for the next phase of the EIA.

3.1.3. Completion of the Scoping Phase

After closure of the comment period, the Scoping Report will be updated to incorporate comments received. The updated Scoping Report will be submitted to DMRE for acceptance. If the Scoping Report is accepted, the project will proceed onto the EIA Phase.

3.2. EIA PHASE

3.2.1. Specialist Studies

Three specialist studies will be undertaken to address the key issues and detailed assessment of the planned prospecting activities. These studies are: (1) an Underwater Heritage Impact Assessment, (2) a Marine Faunal Assessment, and (3) a Fisheries Impact Assessment. The specialist studies will involve the gathering of data relevant to identifying and assessing environmental impacts that may occur as a result of the proposed geophysical surveying, drill sampling and bulk (trench) sampling activities. These impacts will be assessed according to pre-defined rating scales. The studies will also recommended appropriate mitigation or optimisation measures to minimise potential impacts or enhance potential benefits, respectively.

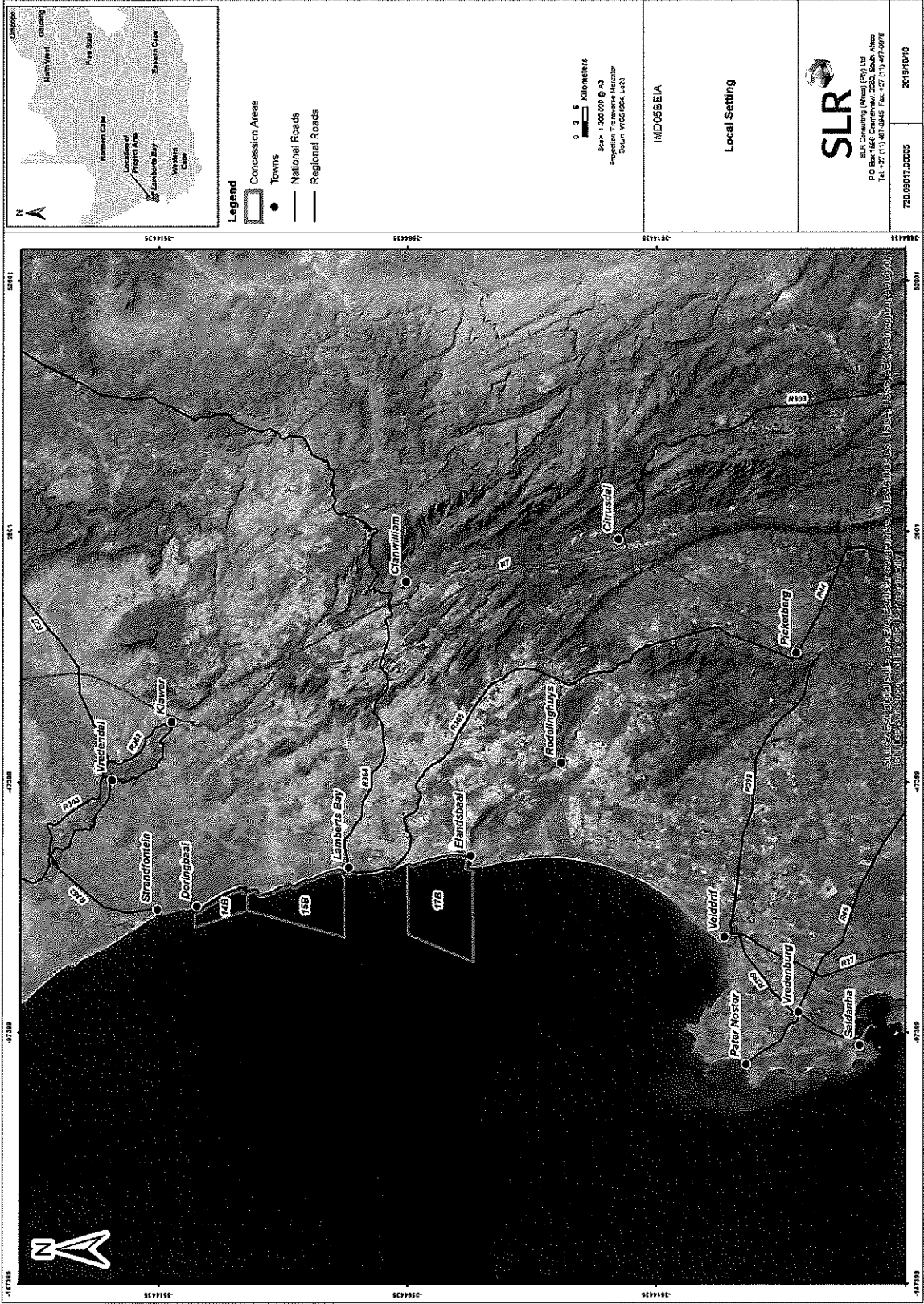


FIGURE 1-1: LOCATION OF THE 14B, 15B AND 17B SEA CONCESSION AREAS, OFF THE WEST COAST OF SOUTH AFRICA.

3.2. EIA PHASE

3.2.1. Specialist Studies

Three specialist studies will be undertaken to address the key issues and detailed assessment of the planned prospecting activities. These studies are: (1) an Underwater Heritage Impact Assessment, (2) a Marine Faunal Assessment, and (3) a Fisheries Impact Assessment. The specialist studies will involve the gathering of data relevant to identifying and assessing environmental impacts that may occur as a result of the proposed geophysical surveying, drill sampling and bulk (trench) sampling activities. These impacts will be assessed according to pre-defined rating scales. The studies will also recommended appropriate mitigation or optimisation measures to minimise potential impacts or enhance potential benefits, respectively.

3.2.2. Integration and Assessment

Information from the specialists, desktop analysis, and the generic EMP prepared for marine diamond mining off the West Coast, will be integrated into an Environmental Impact Report (EIR), which will include an Environmental Management Programme (EMPr). The EIR will be released for a 30-day comment period and all I&APs on the project database will be notified of when the EIR will be available for comment.

After closure of the comment period, all comments received on the draft report will be incorporated and responded to in a Comments and Responses Report. The draft report will then be updated to a final report, to which the Comments and Responses Report will be appended, and will be submitted to DMRE for consideration and decision-making.

The decision taken by DMRE will be advertised and distributed to all I&APs on the project database as part of the statutory appeal period.

4. PROJECT DESCRIPTION

4.1 GENERAL INFORMATION

The proposed prospecting activities would be undertaken within Sea Concessions 14B, 15B and 17B off the West Coast of South Africa. The minerals targeted by the proposed operations would be diamonds, gemstones, heavy minerals, industrial minerals, precious metals, ferrous and base metals.

4.2 NEED AND DESIRABILITY

In the recently published DMRE Strategic Plan 2014-2019, the foreword by the Minister of Mineral Resources notes that the Department “*will continue to promote mineral value addition to strengthen the interface between extractive industries and national socio-economic developmental objectives*”.

This project aims to undertake prospecting operations within Sea Concessions 14B, 15B and 17B in order to identify economically viable diamond deposits on the continental shelf off the coast of the Western Cape. The intention is to derive value from the identified offshore mineral resources in the future and to contribute to the existing diamond mining sector in the Western Cape.

4.3 PROJECT OVERVIEW

The proposed prospecting programme would entail geophysical surveying, drill sampling and bulk (trench) sampling activities. The principal objective of the proposed prospecting activities is to identify and estimate the potential mineral resources within each Sea Concession area for possible future mining. The proposed activities may be divided into stages subject to data reviews and follow-up sampling. Each of the proposed prospecting activities are described below.

4.3.1 Geophysical Surveys

The geophysical surveying will be undertaken using the group-owned dedicated survey vessel, the *DP Star* which has a length of 45 m. The vessel is equipped with:

- a multibeam echosounder designed to produce high resolution digital terrain models of the seafloor in a wide swath below the vessel; and
- a sub-bottom profiler which can generate profiles up to 60 m beneath the seafloor, thereby giving a cross section view of the sediment layers.

Sound levels from the acoustic equipment would range between 190 to 220 dB re 1 μ Pa at 1 m. The proposed surveys would be undertaken in specific priority areas in each of the concessions, at water depths between approximately 30 to 70 m. The surveys would have a line spacing of between 100 to 1 000 m apart. The total line kilometres surveyed per concession will be between 600 and 1 200 km. The planned duration for the proposed geophysical surveys would be a total of four days per concession area (12 days in total) per year over a four year period (i.e. the duration of the validity of the prospecting right).

In general terms, sound sources that have high sound pressure and low frequency will travel the greatest distances in the marine environment. Conversely, sources that have high frequency will tend to have greater attenuation over distance due to interference and scattering effects (Anon 2007). It is for this reason that the acoustic footprint of the above-mentioned sonar survey tools is considered to be much lower than that of deeper penetration low frequency seismic surveys and in addition have lower sound pressure levels. It should be noted that a decibel is a logarithmic scale of pressure where each unit of increase represents a tenfold increase in the quantity being measured.

4.2.2 Drill Sampling

The proposed drill sampling activities would be undertaken using the group-owned dedicated sampling vessel, the *MV The Explorer* which has an overall length of 114.4 m. The vessel is equipped with a subsea sampling tool, which can be operated in water depths up to 200 m. The sampling tool comprises a 2.5 m diameter drill bit operated from a drill frame structure, which is launched through the moon pool of the support vessel and positioned on the seabed.

The drill bit can penetrate sediments up to 12 m depth above bedrock. The sediments are fluidised with strong water jets and airlifted to the support vessel where they are treated in the onboard mineral recovery plant. All oversized and undersized tailings are discharged back to the sea on site.

A sample spacing of as little as 20 m can be achieved by the dynamically positioned vessel. Depending on sea and the seabed geotechnical conditions, up to 60 samples can be successfully taken per day. The samples would be undertaken at intervals of 50 to 500 m. With a planned duration for the proposed drill sampling of four days per year for each concession area, the total number of drill samples that would be obtained during the prospecting right period would be up to a maximum of 2 880. As the drill has a footprint of 5 m², a total area of 1.44 ha would be sampled.

4.3.3 Bulk Sampling

Following analysis of the drill samples and establishment of a potential resource, bulk trench sampling may be conducted to confirm the economic viability of the resource for mining. Trenching would be undertaken by a seabed crawler, deployed off the group-owned dedicated mining vessel, the *MV Ya Toivo* which has a length of 150 m. The vessel is equipped with a track-mounted subsea crawler capable of working to depths up to 200 m below sea level. The crawler, which is fitted with highly accurate acoustic seabed navigation and imaging systems, and equipped with an anterior suction system, is lowered to the seabed and is controlled remotely from the surface support vessel through power and signal umbilical cables. Water jets in the crawler's suction loosen seabed sediments, and sorting bars filter out oversize boulders. The sampled sediments are pumped to the surface for shipboard processing. The area of the seabed to be sampled by crawler can only be determined following analysis of drill samples and development of a resource model.

It is proposed that up to ten trenches, each 180 m long and 20 m wide would be excavated within each concession area. Thus, the area to be disturbed in each concession would be 3.6 ha and for all three concessions 10.8 ha. The planned duration of the proposed bulk sampling would be a total of four days per a concession area over a two year period. It is noted that the trenches will not be contiguous, but located in the prospective areas derived from the drill sampling results. The aim of the trench sampling is to determine the geotechnical characteristics of the footwall and overburden which is essential in establishing the optimal approach to mining in these areas.

4.4 NO-GO ALTERNATIVE

The No-Go alternative is the non-occurrence of the proposed project. The negative implications of not going ahead with the proposed project are as follows:

- Loss of opportunity to establish whether further viable offshore diamond resources exist;
- Prevention of any socio-economic benefits associated with the continuation of prospecting activities; and
- Lost economic opportunities.

The positive implications of the no-go option are that there would be no effects on the biophysical environment in the area proposed for the bulk sampling activities.

5. AFFECTED ENVIRONMENT

5.1 PHYSICAL ENVIRONMENT

The sea concession areas lie within the southern zone of the Benguela Current region and is characterised by the cool Benguela upwelling system. The dominant southerly and south-easterly winds in summer drive the massive

offshore movement of surface water, resulting in strong upwelling of nutrient-rich bottom waters. Nutrient-rich upwelled water enhances primary production, and the West Coast region consequently supports substantial pelagic fisheries.

5.2 BIOLOGICAL OCEANOGRAPHY

The sea concession areas fall into one of the nine bioregions, namely the cold temperate Namaqua Bioregion. Communities within marine habitats are largely ubiquitous throughout the southern African West Coast region, being particular only to substrate type or depth zone. These biological communities consist of many hundreds of species, often displaying considerable temporal and spatial variability (even at small scales).

The demersal fish species likely to be encountered in the general project area occupy waters of <100 m depth and include species such as various skate species, St Joseph, Houndshark, Soupfin shark, Tigar catshark and Bramble shark. Small pelagic species occurring beyond the surfzone and generally within the 200 m contour include the sardine/pilchard, anchovy, chub mackerel, horse mackerel and round herring.

Most seabirds in the region reach highest densities offshore of the shelf break (200 to 500 m depth) and are likely to be encountered. Marine mammals likely to be encountered include sperm whales, migrating humpback and southern right whales and various baleen and toothed whales known to frequent offshore waters.

5.3 HUMAN UTILISATION

The commercial fisheries sectors that could be affected by the proposed prospecting operations are the small pelagic purse-seine, tuna pole, traditional line-fish, West Coast Rock Lobster and gillnet fisheries. The majority of shipping traffic is located on the outer edge of the continental shelf with traffic inshore of the continental shelf along the South-West Coast largely comprising fishing vessels. The majority of the shipping traffic would be limited to the southern extent of Sea Concession 17B.

Exploration for oil and gas is currently undertaken in a number of licence blocks off the West Coast. There is no current development or production from the South African West Coast offshore. A number of proposed prospecting areas for phosphate are located off the West Coast, however, these are located well offshore of the Sea Concession areas. A number of marine diamond mining right and prospecting concession areas are also located in proximity to the Sea Concession areas under this application.

6. KEY PROJECT ISSUES

Key issues to be addressed in the EIA Phase are summarised below.

Potential impact on marine fauna:

- Normal discharges to the marine environment from a variety of sources, including deck drainage, machinery space drainage, sewage and galley wastes from survey and support vessels;
- Potential impacts of multi-beam bathymetry and or sub-bottom profiler noise / pulses on marine fauna. Potential impacts could include physiological injury, behavioural avoidance of the survey area, masking of environmental sounds and communication, and indirect impacts due to effects on prey.
- Localised disturbance of marine fauna due to noise and lighting from the prospecting vessel(s), seabed crawler and support vessels;

- Physical damage to the seabed, alteration of sediment structure, alteration in benthic faunal community composition and potential reduction in benthic biodiversity due to drill and bulk sampling activities;
- Impacts on benthic fauna due to the discharge of processed sediments, including direct mortality, smothering of relatively immobile or sedentary species; and
- Accidental oil spills during normal operations (e.g. bunkering at sea). Oil spilled in the marine environment would have an immediate detrimental effect on water quality.

Potential impact on fishing:

- Decreased fishing effort and / or loss of catch due to:
 - Disruption to fishing operations;
 - Loss of access to fishing grounds in the vicinity of the prospecting vessel areas over the duration of the prospecting operations; and
 - Fish avoidance (flight response) of the prospecting area and changes in feeding behaviour.
- Possible loss of income due to the decreased fishing effort and / or loss of catch.

Potential impact on other marine prospecting/mining and exploration operations:

- Disruption of activities as a result of the imposition of a statutory safety zone around the prospecting vessels.

Potential impact on marine transport routes:

- Interference with shipping routes as a result of the imposition of a statutory safety zone around the prospecting vessels.

Potential socio-economic impacts:

- Creation of limited employment opportunities; and
- Generation of limited direct revenues associated with operational activities such as refuelling, vessel repair, etc.

Potential impacts on underwater cultural heritage material:

- Disturbance and damage to underwater cultural heritage material located on the seabed, particularly historical shipwrecks and other palaeontological or rare geological objects.

Specialist studies will be undertaken to address those issues that require further investigation and detailed assessment.

The remainder of the issues will be assessed based on experience gained from the environmental assessment of similar operations elsewhere in the region and information from the generic EMP prepared for marine diamond mining off the West Coast of South Africa (Lane and Carter 1999) and desktop analysis.

7. SPECIALIST STUDIES

Three specialist studies have been identified for the EIA phase, namely: (1) the impact on marine fauna, (2) the impact on fisheries and (3) the impact on underwater cultural heritage material. The specific terms of reference for these studies are presented below.

7.1 MARINE FAUNA

The specific terms of reference for the marine faunal assessment are as follows:

- Provide a general description of the local marine fauna (including cetaceans, seals, turtles, seabirds, fish, invertebrates and plankton species) within the Sea Concession areas and greater West Coast. The description to be based on, *inter alia*, a review of existing information and data from the international scientific literature, the Generic EMP prepared for marine diamond mining off the West Coast of South Africa and information sourced from the internet;
- Identify, describe and assess the significance of potential impacts of the proposed operations on the local marine fauna, including but not limited to:
 - physiological injury;
 - physical damage to the seabed, alteration of sediment structure, alteration in benthic fauna community composition and potential reduction in benthic biodiversity due to prospecting activities;
 - impacts on benthic fauna due to the discharge of processed sediments, including direct mortality, smothering of relatively immobile or sedentary species and biochemical effects (e.g. direct toxicity and bioaccumulation);
 - behavioural avoidance of the prospecting area;
 - masking of environmental sounds and communication; and
 - indirect impacts due to effects on prey.
- Identify practicable mitigation measures to avoid/reduce any negative impacts and indicate how these could be implemented in the start-up and management of the proposed project.

7.2 FISHERIES

The specific terms of reference for the fisheries assessment are as follows:

- Provide a general description of the fishing activities expected in the Sea Concession areas and along the greater West Coast;
- Undertake a spatial and temporal assessment of expected fishing effort and catch in the Sea Concession areas for each sector identified;
- Assess the impact of the operations on the different fishing sectors;
- Assess the impact of the proposed exclusion zones around the prospecting vessels and potential disturbance of fish on the fishing activities based on the estimated percentage loss of catch and effort; and
- Make recommendations for mitigation measures that could be implemented to minimise or eliminate negative impacts on and enhance any benefits to the fishing industry.

7.3 UNDERWATER CULTURAL HERITAGE MATERIAL

The specific terms of reference for the Underwater Heritage Impact Assessment are as follows:

- Undertake a desktop study of the database of known and suspected wrecks in the area ascertained through the study of available written and oral resources;
- Identify potential Maritime and Underwater Cultural Heritage (MUCH) sites within the designated area; and
- Recommend management measures for sites before and during development.

From: [Estelle Bester](#)
To: [Candice Sadan](#)
Cc: [Rizqah Baker](#)
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Date: 06 November 2019 01:38:07 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Good afternoon Candice

I hereby confirm receipt of your emails.

I forwarded it to Ms. Doretha Kotze, City and Regional Planner of the West Coast District Municipality.

You are welcome to contact her on 022-4338523 or email her at dkotze@wcdm.co.za

Kind Regards

Estelle

From: Candice Sadan [mailto:csadan@slrconsulting.com]
Sent: Wednesday, 06 November 2019 12:30 PM
To: Estelle Bester <hhfbester@wcdm.co.za>
Cc: Rizqah Baker <rbaker@slrconsulting.com>
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Good afternoon ma'am

Please could you kindly confirm receipt of the emails below?

Many thanks

Kind regards

From: Candice Sadan
Sent: 24 October 2019 12:43 PM
To: hhfbester@wcdm.co.za
Cc: Rizqah Baker
Subject: FW: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Good day ma'am

Please find notification below for your perusal. Kindly note that Rizqah Baker from our office has been trying to reach Mr. David Joubert for the last two weeks to discuss the application.

This was just a courtesy call to answer any questions that he may have on the matter.

Mr. Joubert is welcome to contact us should he wish to discuss the attached.

Many thanks

Kind regards

From: Candice Sadan
Sent: 11 October 2019 04:37 PM
To: Candice Sadan
Cc: Nicholas Arnott
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Dear Interested and/or Affected Party

The attached correspondence provides information regarding the availability of a draft Scoping Report for review and comment in accordance with the EIA Regulations, 2014 (as amended). Should you and / or your organisation wish to comment on the Scoping Report for the proposed project, such comments should be sent to our Ms Candice Sadan (at the details below) by no later than 13 November 2019. For more information, please refer to the attached letter and copy of the Executive Summary of the draft Scoping Report.

Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned.

SLR Consulting (South Africa) (Pty) Ltd
Attention: Ms Candice Sadan
PO Box 10145, CALEDON SQUARE, 7905
Tel: (021) 461 1118/9
E-mail: csadan@slrconsulting.com

Yours sincerely



Candice Sadan

Office Administrator

+27 21 461 1118

csadan@slrconsulting.com

SLR Consulting
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From: [Doretha Kotze](#)
To: [Candice Sadan](#)
Cc: [Collaborate Mailbox](#)
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Date: 08 November 2019 08:42:24 AM
Attachments: [image005.png](#)
[image007.png](#)
[image008.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

Ref: 13/2/12/2/3 & 13/2/12/4/3

Madam

Your email of 11 October 2019 and the information pertaining to the Draft Scoping Report for the Proposed Prospecting for Offshore Sea Concessions 14B, 15B & 17B refer.

Should any land based activities in support of this proposal be required in the West Coast District Municipal Area, the necessary authorisations should be obtained from the relevant local municipalities before commencement of any activities associated with the proposed prospecting.

Regards

D o r e t h a K o t z e
Stads- en Streekbeplanner/Town and Regional Planner
Weskus Distriksmunisipaliteit
Langstraat 58 Long Street
Posbus 242 PO Box
MOORREESBURG 7310
Tel: 022 433 8523
West Coast District Municipality



From: Candice Sadan [<mailto:csadan@slrconsulting.com>]
Sent: Friday, October 11, 2019 4:37 PM
To: Candice Sadan <csadan@slrconsulting.com>
Cc: Nicholas Arnott <narnott@slrconsulting.com>
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

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Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned.

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Attention: Ms Candice Sadan
PO Box 10145, CALEDON SQUARE, 7905
Tel: (021) 461 1118/9
E-mail: csadan@slrconsulting.com

Yours sincerely



Candice Sadan

Office Administrator

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From: [Alyssa Goncalves](#)
To: [Candice Sadan](#)
Cc: [Danne Joubert](#)
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Date: 08 November 2019 07:48:37 AM
Attachments: [image010.png](#)
[image012.png](#)
[image013.png](#)
[image015.png](#)
[image016.png](#)
[image017.png](#)

Good day

Herewith acknowledgement of receipt of your email. The content is being forwarded to our Environmental officer, Ms Danne Joubert/ dannej@cederbergmun.gov.za / 027 482 8600.

Regards

ALYSSA SUMMERS
EXECUTIVE SECRETARY OF THE MUNICIPAL MANAGER
CEDERBERG MUNICIPALITY
TEL: 027 482 8000
FAX: 027 482 1933
EMAIL: alyssag@cederbergraad.co.za
WEBSITE: www.cederbergmun.gov.za



From: Candice Sadan [<mailto:csadan@slrconsulting.com>]
Sent: Wednesday, 06 November 2019 12:06 PM
To: alyssag@cederbergraad.co.za
Cc: Rizqah Baker
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Good afternoon ma'am

Please could you kindly confirm receipt of the email below?

Many thanks

Kind regards

From: Candice Sadan
Sent: 17 October 2019 04:09 PM
To: alyssag@cederbergraad.co.za
Cc: Rizqah Baker
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

From: Candice Sadan
Sent: 11 October 2019 04:37 PM
To: Candice Sadan
Cc: Nicholas Arnott
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR):

Notification

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Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned.

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Yours sincerely



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From: [Peter Foley](#)
To: [Candice Sadan](#)
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Date: 11 November 2019 12:37:56 PM
Attachments: [Belton Park Trading 127 \(Pty\) EIA.pdf](#)

Good Afternoon Candice Sadan

Attached comment from the WCRLA on Belton Park Trading (Pty) EIA.

Regards

Peter Foley

WEST COAST ROCK LOBSTER ASSOCIATION

1st Floor, Harbour Place, 7 Martin Hammerschlag Way, Foreshore, P O Box 2066, Cape Town 8000
Tel: (021) 4252727-Fax: (021) 4254734: email peter@inshore.co.za

8 November 2019

SLR Consulting (South Africa) (Pty) Ltd
P O Box 10145
Caledon Square
7950

Attention: Ms Candice Saden

Belton Park Trading 127 (Pty) Ltd EIA for a Prospecting Right Application for Offshore Sea Concessions: 14B, 15B and 17B

The West Coast Rock Lobster Association (WCRLA) representing Nearshore and Offshore rights holders, who have been awarded fishing rights for fifteen years to catch lobster in the Sea Concessions 14B, 15B and 17B, located off the West Coast at Dorinbaai, Lamberts Bay and Elandsbaai.

Our members are very concerned about the impact that the drill and bulk (trench) sampling activities will have on the west coast rock lobster inshore fishing grounds on their livelihoods, and we request that you keep us informed as an interested party.

Yours faithfully



CHAIRPERSON
SHAMERA DANIELS



From: [Alana Duffell-Canham](#)
To: [Candice Sadan](#)
Cc: [Alexis Olds](#); [Marius Wheeler](#)
Subject: RE: Scoping Report for an EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B, West Coast.
Date: 13 November 2019 07:18:18 AM
Attachments: [Pros_Offshore_14B-15B-17B_20191113.pdf](#)

Dear Candice

Please find comment from CapeNature attached.

Kind regards,
Alana

Alana Duffell-Canham
Conservation Intelligence Manager – Landscape Central



CapeNature

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reference SSD14/2/6/1/8/6/Pros_Offshore_14B-15B-17B

date 13 November 2019

Ms. Candice Sadan
SLR Consulting (South Africa) (Pty) Ltd
PO Box 10145, Caledon Square
Cape Town
7905

By email: csadan@slrconsulting.com

Dear Ms Sadan,

RE: Scoping Report for an EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B, West Coast.

CapeNature would like to thank you for the opportunity to comment on the Scoping Report for this application and wish to make the following comments. Please note that our comments pertain only to biodiversity related impacts and not to the overall desirability of the application.

1. The application is to undertake offshore prospecting activities in Sea Concessions Area 14B, 15B and 17B, located off the West Coast of South Africa. The application proposes to undertake prospecting operations for various minerals within each of the Sea Concession Areas. The proposed prospecting operations would entail geophysical surveys, drill sampling and bulk (trench) sampling.
2. The National Biodiversity Assessment of 2018 indicates Concession Area 14B is classified as Namaqua Sandy Inner Shelf with a threat status of Least Concern. Concession Area 15B and 17B are classified as St Helena Bay ecosystem with a threat status of Vulnerable. According to the 2018 CBA layer, all three concession areas contain irreplaceable CBA's.
3. Concession Area 15B is less than 1 km from Lambert's Bay Bird Island. This is a provincial nature reserve which hosts the fourth largest breeding colony (approximately 8500 breeding pairs) of Cape Gannet, which has a global IUCN threat status of Endangered (IUCN 2018). Other bird species of conservation concern found at Lambert's Bay Bird Island can be seen in the table below:

English Name	Scientific Name	Global IUCN Category (IUCN 2011)	Regional IUCN Category
African Black Oystercatcher	<i>Haematopus moquini</i>	Near Threatened	Least Concern
African Penguin	<i>Spheniscus demersus</i>	Endangered	Endangered
Bank Cormorant	<i>Phalacrocorax neglectus</i>	Endangered	Endangered
Cape Cormorant	<i>Phalacrocorax capensis</i>	Endangered	Endangered
Cape Gannet	<i>Morus capensis</i>	Vulnerable	Vulnerable
Caspian Tern	<i>Sterna caspia</i>	Least Concern	Vulnerable
Crowned Cormorant	<i>Phalacrocorax coronatus</i>	Near Threatened	Near Threatened
Great White Pelican	<i>Pelecanus onocrotalus</i>	Least Concern	Near Threatened
Greater Flamingo	<i>Phoenicopterus ruber</i>	Near Threatened	Least Concern
Lesser Flamingo	<i>Phoenicopterus minor</i>	Near Threatened	Near Threatened
Southern Giant-Petrel	<i>Macronectes giganteus</i>	Least Concern	Near Threatened

4. The potential impacts of drilling and trenching activities on the benthic habitats of Concession Areas 15B and 17B are concerning as the habitat is listed as Vulnerable and Contain irreplaceable CBA areas. These activities will have impacts on the ecosystem which could displace the prey sources of coastal birds on Lambert's Bay Bird Island.
5. The mouth of the Verlorenvlei Estuary opens into the St Helena Bay, less than 1 km inshore of Concession Area 17B. The Verlorenvlei Estuary was declared a RAMSAR site in 1991 which classifies it as a wetland of international importance. In 2013, the estuary was declared an Important Bird Area by BirdLifeSA.
6. There may be potential negative impacts on eco-tourism activities if birds are displaced from the island owing to food displacement or disturbance from the prospecting vessels.
7. The specialist faunal study must address possible impacts on Cape Gannet and African Penguin, directly (possible oiling and slick contamination, birds displacing due to disturbance by vessels) but also indirectly; the potential effects on their prey source. The specialist study must also include the potential impacts on the Verlorenvlei Estuary not only as an important bird area but also for estuarine dependent fish species that may be negatively impacted by the prospecting activities.

Based on the current information available and the points above, CapeNature objects to this application.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



Alexis Olds
For: Manager (Landscape Conservation Intelligence)

DEPARTMENTAL REFERENCES:

16/3/3/6/4/2/2/F2/5/2161/19 (Development Management)

19/2/5/3/F3/15/WL0164/19 (Waste Management)

DATE: 13 November 2019

The Board of Directors
SLR Consulting (South Africa) (Pty) Ltd
P.O. Box 10145
CALEDON SQUARE
7905

For attention: Ms Candice Sadan

Tel: (021) 461 1118

E-mail: csadan@slrconsulting.com

PER E-MAIL

Dear Madam

COMMENT ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR LISTED ACTIVITIES ASSOCIATED WITH THE PROSPECTING RIGHT IN OFFSHORE SEA CONCESSIONS 14B, 15B AND 17B, OFF THE WEST COAST OF SOUTH AFRICA (DMRE REFERENCES: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR AND WC30/5/1/1/2/10313PR)

The correspondence of 11 October 2019 requesting comments on the Draft Scoping Report ("DSR") which was received by the Department on 14 October 2019, refers. Please find the Department's consolidated comment on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated October 2019.

1. Directorate: Development Management (Region 1) – Ms Natasha Bieding
(Natasha.Bieding@westerncape.gov.za; Tel: (021) 483 5833):

1.1 Regulation 41(6) of the EIA Regulations, 2014 (as amended) requires that participation by potential or registered interested and affected parties ("I&APs") should be facilitated in such a manner that all potential or registered I&APs are provided with a reasonable opportunity to comment on the application. In view of the nature and potential impacts of the proposed prospecting operations on

coastal communities, it is recommended that if so requested by local communities or organisations, interactive consultation sessions be held during the EIA phase, which could include meetings or open days to explain the development proposal and potential impacts and mitigation measures.

- 1.2 An environmental sensitivity map indicating environmental sensitive areas and features that will be impacted upon, and a final layout map overlain on the environmental sensitivity map, indicating how the sensitive areas and features will be avoided, should be included in the Draft EIA Report.
- 1.3 The need and desirability of the proposed prospecting operations in the context of other prospecting and mining activities in the proposed sea shore concessions, must be elaborated on in the Draft EIA Report. The Draft EIA Report must further indicate whether the proposed prospecting operations are aligned to any of the six focus areas of Operation Phakisa.
- 1.4 The Marine Fauna specialist study must provide avoidance and mitigation measures related to the preferred season for undertaking of prospecting operations to avoid or limit impacts to local marine fauna. These avoidance and mitigation measures must be provided for the undertaking of the various phases of the proposed prospecting, i.e. for geophysical surveys, drill sampling, and bulk (trench) sampling.
- 1.5 Based on the findings of the various specialist studies, the Draft EIA Report must provide an indication of the anticipated months or season that geophysical surveys and drill sampling (four days per year per concession area over a four-year period) and bulk sampling (four days per year per concession area over a two-year period) will occur. Please further indicate whether different zones in each concession area will be subjected to geophysical surveys, drill sampling and bulk sampling during the duration of the validity of the prospecting right.
- 1.6 Section 3.1.3, page 21 of the DSR provides a list of minerals targeted for the proposed prospecting operations. However, other sections of the DSR only refer to prospecting for diamonds. Please ensure that the target minerals are consistently referred to in future documents of this application. The approximate depth of the trench/es to be excavated during bulk sampling should be included in any future reports (assuming to be at depths of up to 200m below sea level – please confirm?).
2. Directorate: Waste Management – Ms Helena Bouwer (Helena.Bouwer@westerncape.gov.za; Tel: (021) 483 4626):
 - 2.1 It is noted that the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) is not applicable to offshore activities. As such, a waste management licence would not be required for offshore waste management activities, such as the treatment of waste. If possible, the relevant requirements/annexures of the International Convention for the Prevention of Pollution from Ships, 197/1978 related to discharges to sea, should be included in the Environmental Management Programme ("EMPr").

- 2.2 Any waste material, including healthcare risk waste generated on shipping vessels and brought onshore within the Western Cape Province, must only be treated and/or disposed of at a registered healthcare risk waste treatment facility and/or licenced waste disposal facility. The temporary storage of waste on land may not exceed a period longer than 90 days.
- 2.3 Please note that general and hazardous waste generated must always be separated as the mixing of these two waste types will result in the entire volume of waste being classified as hazardous waste.
- 2.4 The Draft EIA Report and EMPr must provide a description of the rehabilitation, closure and ongoing post-decommissioning activities associated with the proposed prospecting operations.
3. Please direct any enquiry to the official(s) indicated in this correspondence should you require any clarity on any of the comments provided.
4. The Department reserves the right to revise or withdraw its comments and request further information based on new information received.

Yours faithfully



pp **HEAD OF DEPARTMENT**

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

Rizqah Baker

From: Candice Sadan
Sent: 14 November 2019 12:40 PM
To: Nicholas Arnott; Rizqah Baker
Subject: FW: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification
Attachments: image002.jpg; image003.png; image004.jpg; image005.png; image006.png; image007.jpg; image008.png; image009.png; image010.png
Follow Up Flag: Follow up
Flag Status: Flagged

From: Johann Augustyn [johann@sadstia.co.za]
Sent: Thursday, November 14, 2019 12:04 PM
To: Candice Sadan
Subject: RE: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Dear Candice

On behalf of SAPFIA (South African Pelagic Fishing Industry Association), we would like to register as an affected party and our concerns address in the EIA. If there are therefore any workshops held, we would like to be invited.
Thanks
Johann

[E-mail Logo 50]

From: Candice Sadan <csadan@slrconsulting.com>
Sent: Friday, 11 October 2019 16:37
To: Candice Sadan <csadan@slrconsulting.com>
Cc: Nicholas Arnott <narnott@slrconsulting.com>
Subject: Belton Park Trading 127 (Pty) Ltd – EIA for a Prospecting Right Application for Offshore Sea Concessions 14B, 15B & 17B (DMRE Ref.: WC30/5/1/1/2/10311PR, WC30/5/1/1/2/10312PR & WC30/5/1/1/2/10313PR): Notification

Dear Interested and/or Affected Party

The attached correspondence provides information regarding the availability of a draft Scoping Report for review and comment in accordance with the EIA Regulations, 2014 (as amended). Should you and / or your organisation wish to comment on the Scoping Report for the proposed project, such comments should be sent to our Ms Candice Sadan (at the details below) by no later than 13 November 2019. For more information, please refer to the attached letter and copy of the Executive Summary of the draft Scoping Report.

Should you have any queries on the above, or require any further information, please do not hesitate to contact the undersigned.

[SLR Consulting (South Africa) (Pty) Ltd Attention: Ms Candice Sadan PO Box 10145, CALEDON SQUARE, 7905 Tel: (021) 461 1118/9 E-mail: csadan@slrconsulting.com]

Yours sincerely

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Candice Sadan

Office Administrator

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