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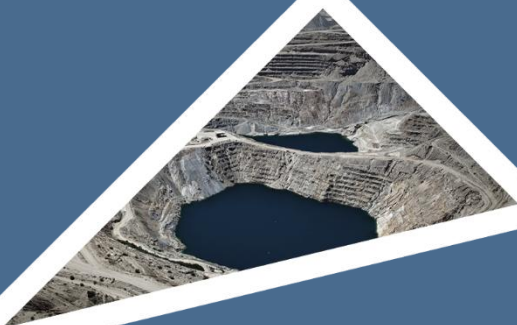
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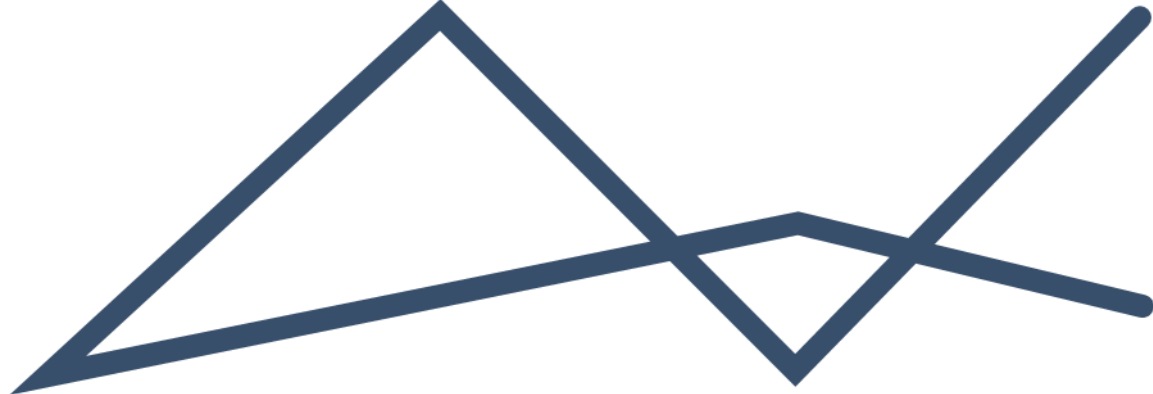
SITE SENSITIVITY AND VERIFICATION REPORT

BLACK MOUNTAIN MINING – SANDGAT PROSPECTING RIGHT PROJECT

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1 SCOPE AND PURPOSE

Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations (GNR 982 promulgated under the National Environmental Management Act (Act 107 of 1998-NEMA)), requires that a Screening Report generated by the national web-based environmental screening tool for the specific site and activity must accompany any application for Environmental Authorization.

The Screening Report identifies preliminary development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmentally sensitive features on the site based on the site sensitivity screening. On the basis of the sensitivities identified in the site sensitivity screening, a list of preliminary specialist studies required to be considered in the Impact Assessment process are provided.

Prior to commencing with a specialist assessment identified in the Screening Report, the current use of the land and the environmental sensitivity of the site, must be confirmed by undertaking a site sensitivity verification. The site sensitivity verification must be undertaken by an environmental assessment practitioner or a specialist. The site sensitivity verification must be undertaken through the use of:

- a) a desk top analysis, using satellite imagery;*
- b) a preliminary on-site inspection; and*
- c) any other available and relevant information.*

This Site Sensitivity and Verification Report (SSVR) is a record of the outcome of the site sensitivity verification in compliance with the requirements of the procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of Sections 24(5)(a) and (h) and 44 of the NEMA. The SSVR aims to:

- a) confirm or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;*
- b) contain motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity; and*
- c) be submitted together with the relevant assessment report prepared in accordance with the requirements of the Environmental Impact Assessment Regulations(EIA Regulations).*



2 PROJECT BACKGROUND

2.1 PROJECT ASPECTS

Black Mountain Mining (Pty) Ltd (BMM) (hereafter referred to as the applicant), aims to prospect for ferrous & base metals (Copper Ore, Iron Ore, Lead Ore, Zinc Ore, Manganese Ore, Nickel and Molybdenum) and associated metals and minerals, precious metals (Gold Ore, Silver Ore), gemstones, and/or nuclear fuels/Ferrous and Base metals (Uranium ore) and all associated metals and minerals. The applicant also aims to ascertain if economically viable mineral deposits exist within the application area. The proposed activities include both Non-Invasive Prospecting Techniques such as desktop assessments, geological field mapping and semi-regional Geophysical Survey as well as Invasive Prospecting Techniques such as exploration boreholes and Resource Definition Drilling.

The area is located approximately 75 to 138 km east of Aggeneys and 31 to 85 km south-east of Pofadder, Namaqualand District, Northern Cape Province. The associated farms of the PR area are located across the Kai !Garib Local Municipality of the ZF Mgqawu District Municipality, as well as the Khâi-ma Local Municipality of the Namakwa District Municipality, in the Northern Cape Province. The area is ~ 46 940.02 hectares). The prospecting area cover twelve (12) farm portions namely:

- Remaining Extent of farm Lovedale 201;
- Remaining Extent of farm Quagga- Maag 200;
- Remaining Extent of farm Haartebeest-vlei 199;
- Remaining Extent of farm Vaal-kop 225;
- Portion 1 of the Farm Vaal-kop 225;
- Remaining Extent of farm Adjoining Geelvloer 197;
- Portion 8 of farm Adjoining Geelvloer 197;
- Portion 1 of farm Adjoining Geelvloer 197;
- Portion 2 of farm Adjoining Geelvloer 197;
- Portion 4 of farm Adjoining Geelvloer 197;
- Portion 3 of farm Adjoining Geelvloer 197; and
- Portion 6 of farm Adjoining Geelvloer 197.

The application will follow a phased approach, and the project is divided into several sequential phases. At the end of each section there will be a period of compiling, evaluating and reporting results. These results will not only determine whether the project proceeds, but also the manner in which it will go forward. Essentially, BMM will only action the next phase once satisfied with the results obtained. The project will include the use of the following Non-Invasive and Invasive prospecting techniques:

Non-Invasive Prospecting Techniques:

- a) Desktop Study/Literature review
- b) Geological Field Mapping
- c) Semi-Regional Geophysical Survey
- d) Compilation, Interpretation and Modelling of Data
- e) Detailed Ground Geophysical Survey on individual positively mineralized targets to define possible extent
- f) Analytical Desktop Pre-Feasibility Study



Invasive Prospecting Techniques:

- a) Exploration Boreholes
- b) Boreholes to confirm continuity of mineralization & potential deposit size
- c) Resource Definition Drilling

Table 1: Project description

		Location (DD MM SS)	
Project Aspect	Details	Latitude	Longitude
1.	A typical project entails the drilling of boreholes across vast areas, and do not require the construction of roads, the removal of large areas of vegetation or taking of bulk samples. Impacts associated with anticipated prospecting activities are generally of low significance, however, the identification and avoidance of environmentally sensitive areas, and facilitation of constructive relationships with affected stakeholders, are critical.	-29.398260	20.199646
		-29.388994	20.224534
		-29.283340	20.133845
		-29.381712	20.043922
		-29.312258	20.039195
		-29.269380	19.991219
		-29.288790	19.875686
		-29.272294	19.697904
		-29.272299	19.685429
		-29.300219	19.696396
		-29.325942	19.710682
		-29.365772	19.760775
		-29.356909	19.840975
		-29.361885	19.866612
		-29.344728	19.927584
		-29.428206	19.995880
		-29.417777	20.010888
		-29.445665	20.045726
		-29.413357	20.092308
		-29.391691	20.155961



2.2 SITE LOCALITY AND LAYOUT

Insert a text description of the project location (similar to what would be used in the call to register letter). Include reference to the locality map and layout plan figures below. Make sure there is distinction between site property and the actual development footprint as far as possible.

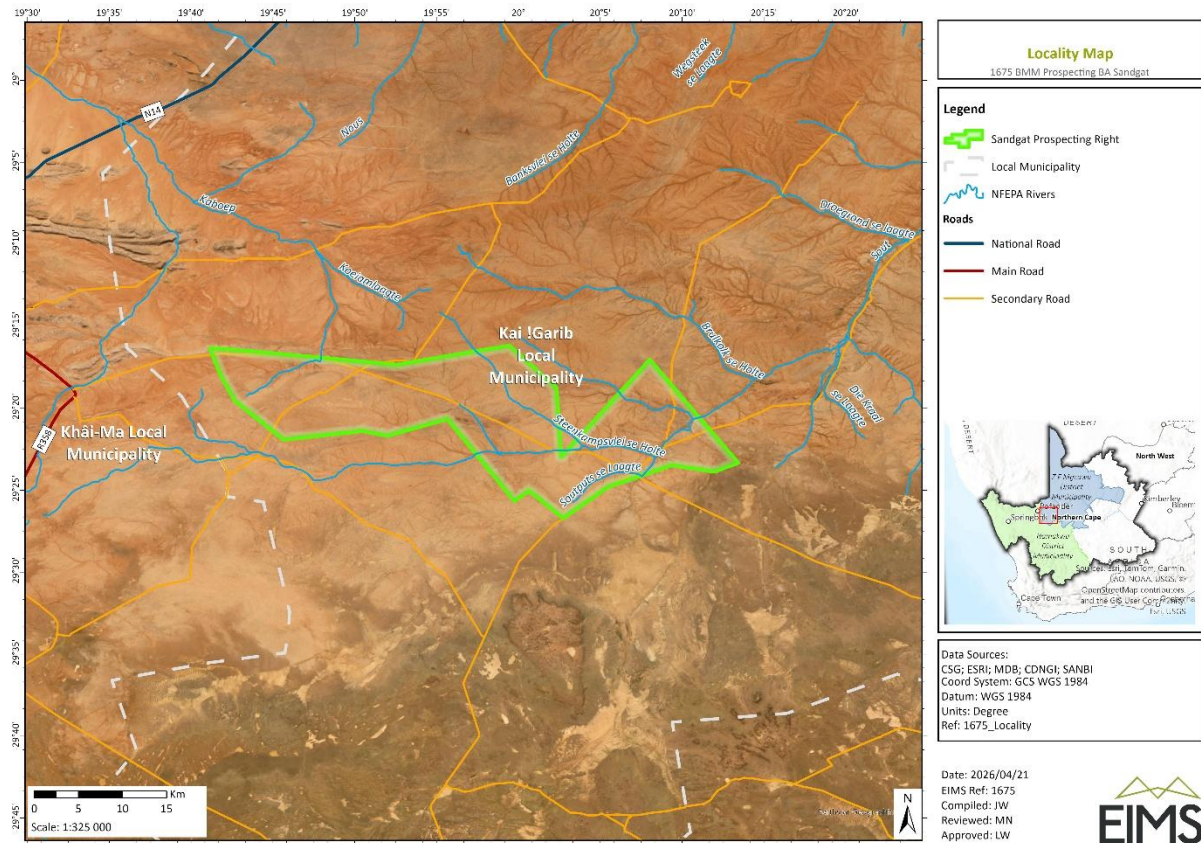
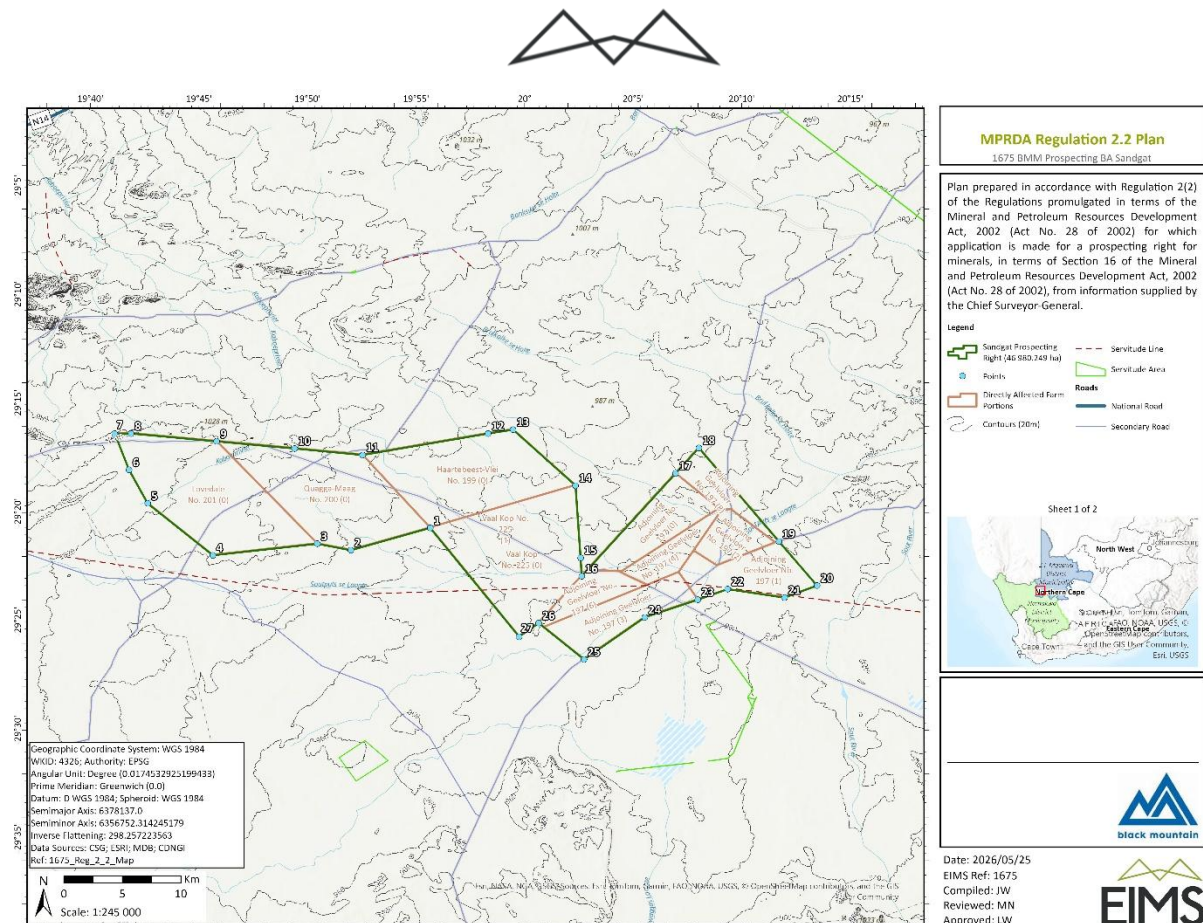


Figure 1: Site locality map.



Point	Latitude	Longitude	Point	Latitude	Longitude
1	-29.34472899	19.92758106	15	-29.36764599	20.04306307
2	-29.36188599	19.86660906	16	-29.38170999	20.04392307
3	-29.356906	19.84097207	17	-29.30293799	20.11595507
4	-29.36576799	19.76077307	18	-29.28334399	20.13384907
5	-29.325942	19.71068207	19	-29.35512199	20.19527407
6	-29.30021599	19.69639706	20	-29.3889936	20.2245316
7	-29.27229899	19.68542407	21	-29.39826199	20.19965106
8	-29.27229799	19.69790507	22	-29.391693	20.1559633
9	-29.27834699	19.76366007	23	-29.39983499	20.13309307
10	-29.28382099	19.82347607	24	-29.41335999	20.09231306
11	-29.28878699	19.87568306	25	-29.44566899	20.04572707
12	-29.27233199	19.97208106	26	-29.41777699	20.01089207
13	-29.26937799	19.99121806	27	-29.42820399	19.99588406
14	-29.31225799	20.03919606			

Nr#	Farm Name	Farm No#	Portion No#	District Municipality
1	Lovedale 201	201	RE	ZF Mgcawu
2	Quagga- Maag 200	200	RE	ZF Mgcawu
3	Haartebeest- Vlei 199	199	RE	ZF Mgcawu
4	Adjoining Geelvloer 197	197	RE	ZF Mgcawu
5	Adjoining Geelvloer 197	197	8	ZF Mgcawu
6	Adjoining Geelvloer 197	197	1	ZF Mgcawu
7	Adjoining Geelvloer 197	197	2	ZF Mgcawu
8	Adjoining Geelvloer 197	197	4	ZF Mgcawu
9	Adjoining Geelvloer 197	197	3	ZF Mgcawu
10	Adjoining Geelvloer 197	197	6	ZF Mgcawu
11	Vaal- Kop 225	225	RE and Portion 1	ZF Mgcawu

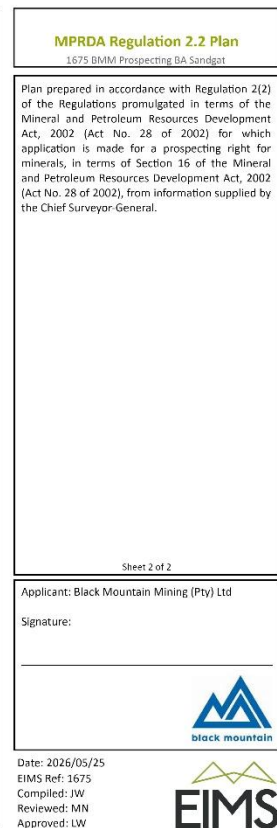


Figure 2: Regulation 2.2 Plan



2.3 DEA SCREENING TOOL ASSESSMENT

Regulation 16(1)(b)(v) of the Environmental Impact Assessment Regulations (GNR 982 promulgated under the National Environmental Management Act (Act 107 of 1998-NEMA)), requires that a Screening Report generated by the national web-based environmental screening tool for the specific site and activity must accompany any application for Environmental Authorization.

The Screening Report identifies preliminary development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmentally sensitive features on the site based on the site sensitivity screening. On the basis of the sensitivities identified in the site sensitivity screening, a list of preliminary specialist studies required to be considered in the Impact Assessment process are provided. Table 2 provides the proposed development area environmental sensitivity as provided by the national web-based environmental screening tool.

Table 2: Screening Tool Report- Proposed development area environmental sensitivity.

Aspect	Very High	High	Medium	Low
Agriculture Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Animal species Theme	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Aquatic Biodiversity Theme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Archaeological and Cultural Heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Civil Aviation Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Defence Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Palaeontology Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Plant Species Theme	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Terrestrial Biodiversity Theme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3 SITE ASSESSMENT

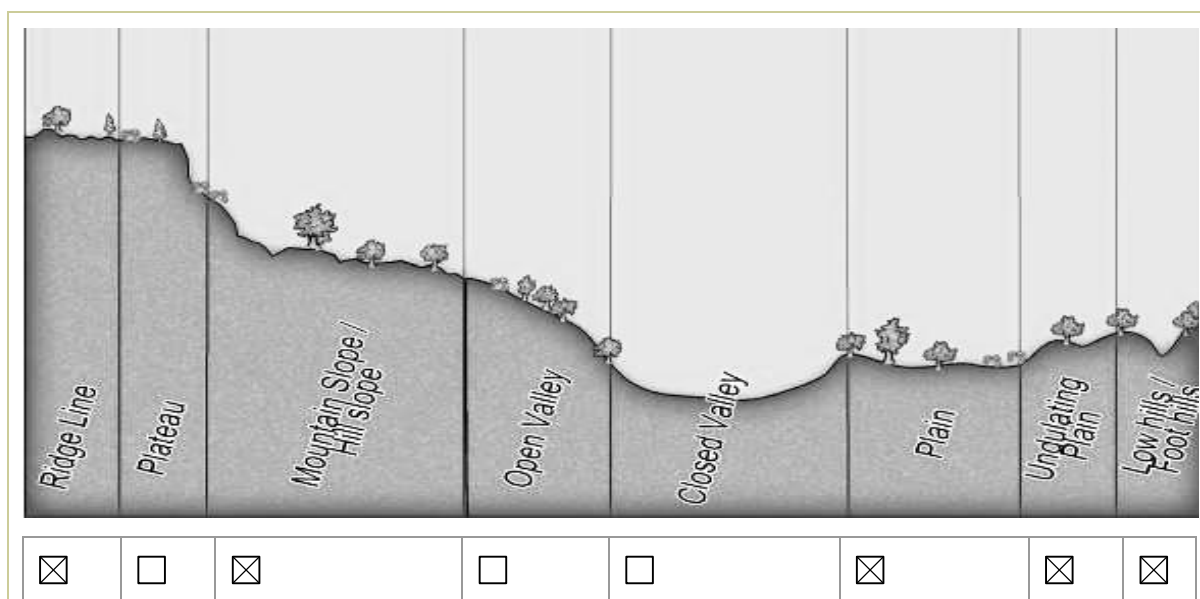
Prior to commencing with a specialist assessment identified in the Screening Report, the current use of the land and the environmental sensitivity of the site, must be confirmed by undertaking a site sensitivity verification. The site sensitivity verification must be undertaken by an environmental assessment practitioner or a specialist. The site sensitivity verification must be undertaken through the use of:

- a desk top analysis, using satellite imagery;
- a preliminary on-site inspection; and
- any other available and relevant information.

The sub-sections below aim to provide context of the existing site conditions to support the site sensitivity and verification.

3.1 GRADIENT

The general gradient characteristics of the site:



3.2 SENSITIVE AREAS

Is the site located in the immediate vicinity of the following:	Yes	No	Comment
Erosion Channels or areas of severe erosion/ destabilized soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Several erosion channels were noted especially along the main gravel road cutting the site into two halves.
Wetlands (within 32m)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There were no visible wetlands with visible water, however, considering that a tributary of a non-perennial river can be considered a wetland, particularly if it functions as a temporary watercourse, ephemeral stream, or part of a riverine system that periodically holds water, wetlands do exist on site.
Unstable slopes or geological features (rocky outcrops)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Steep rocky outcrops (ridges) were observed within the study area.
Bare areas	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Several bare areas around the site were noticed along the gravel access roads and disturbed areas.
Other Sensitive or risk areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There were no visible watercourses with flowing water. However, there was visible evidence of rivers which flow occasionally (non-perennial rivers) noted through a concentration of green vegetation in a linear pattern such as the Soutputs se Laagte and Steenkampvlei se Holte, which flows east to west across the site as well as several other tributaries noted across the site.



Is the site located in the immediate vicinity of the following:	Yes	No	Comment
Are any existing servitudes and structures directly or indirectly affected by the proposed sites and routes (e.g. Eskom, public road servitudes and restrictions-60m from National Road, farmer's water/irrigation supplies, etc.)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There are old low voltage (likely 11/22kV) powerline pylons with no powerline cable. The N14 national road runs in the middle of the project area and other public roads and road reserves. The EAP did not identify any other servitude areas, there are however several homesteads which should be avoided.

3.3 VEGETATION

<i>Which of the listed descriptions best describes the general groundcover on and around the site?</i>				
<input type="checkbox"/> Natural veld - good condition	<input checked="" type="checkbox"/> Natural veld with scattered aliens	<input type="checkbox"/> Natural veld with heavy alien infestation	<input type="checkbox"/> Veld dominated by alien species	<input checked="" type="checkbox"/> Gardens
<input type="checkbox"/> Sport field	<input type="checkbox"/> Cultivated land	<input type="checkbox"/> Paved surface	<input checked="" type="checkbox"/> Building or other structure	<input checked="" type="checkbox"/> Bare soil
Comments on vegetation composition:		The study area has a fairly homogenous vegetation which consists mainly of Bushmanland Arid Grassland, which include mainly grasses and some shrubs. The northeastern section of the study area overlaps with a small portion of Bushmanland inselberg shrubland and Bushmanland Basin Shrubland. Alien vegetation is scattered around the site.		
Comments on weed species/type		Alien vegetation is scattered around the site, more present on the eastern section. The exact type and species will be confirmed by the terrestrial ecologist during the terrestrial biodiversity study.		

3.4 LAND COVER/ USE DESCRIPTION



The SSVR aims to:

- confirm or dispute the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.; and
- contain motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity.

The site consists of a mixture of homesteads with livestock, farming community, low laying grassland, isolated shrubs, bare ground, non-perennial watercourses, rocky outcrops and gravel access roads (refer to Figure 1 for the site locality and the section below for site photos).



Table 3: Site photographs.

	
Main gravel access road (secondary road), divides the site into the northern and southern sections	General conditions of the mid-northern section of the study area consisting largely of sparse low laying grass and short shrubs.



View of the soil type and shrubs, as well as a powerline servitude in the western section of the study area.



View of the general conditions of the eastern section with ridge in background.



Geological features noted including rocky outcrops.



Geological features noted including rocky outcrops.



4 VERIFICATION FINDINGS AND MOTIVATION

The Screening Report identifies preliminary development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmentally sensitive features on the site based on the site sensitivity screening (Section 2.3). On the basis of the sensitivities identified in the site sensitivity screening, a list of preliminary specialist studies required to be considered in the Impact Assessment process are provided. Table 4 below lists the screening tool identified specialist studies and associated screening tool sensitivity. Based on the findings of the site verification process (Section 3) a verified, or suggested revised sensitivity is provided together with an associated motivation.



Table 4: Assessment for specialist studies and motivation.

Screening Specialist Required:	Tool Study	Level of Sensitivity:	Suggested Sensitivity:	Required level of Assessment	Motivation
Agriculture Impact Assessment		Medium	Medium	Compliance Statement	The only agricultural activities noted within the area was small-scale isolated livestock farming. The areas arid, sandy soils and lack of grass cover make it difficult to undertake agricultural activities especially considering that there are no perennial rivers within proximity of the site. Considering the nature of the proposed activity (prospecting activities), there will be minimal impact to none on agricultural activities. Based on the Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Agricultural Resources (GN 320, 2020), site verification by a specialist is required and a Compliance Statement to be compiled.
Archaeological and Cultural Heritage Impact Assessment		Low	Low	Compliance Statement	Based on the DFFE Screening Tool, no heritage features occurs on the study area. Field assessment of the known Heritage Sites found that there are no heritage features within the known areas (based on areas transacted during the sensitivity verification). However, old building ruins likely older than 60 years were noted on site next to one of the homesteads. Although it is assumed that drilling sites can easily avoid the heritage features, the final drilling activities may fall within proximity of the potential heritage feature based on the outcome of the non-invasive prospecting activities. Therefore, a Heritage Compliance Assessment should be undertaken and align with the Minimum Standards for Heritage Specialist Studies in terms of Section 38 of the National Heritage Resources Act (No. 25 of 1999).
Palaeontology Impact Assessment		Medium	Low	Desktop Assessment	According to the SAHRIS palaeo sensitivity map, the site falls with the Medium to Low and Insignificant/Zero palaeo sensitivity. In addition, no fossiliferous outcrops were noted within the site. Considering that for the Insignificant/Zero palaeo sensitivity, no palaeontological studies are required while for Low-Medium palaeo sensitivity, a desktop palaeontological study need to be conducted by a qualified palaeontologist.



Screening Specialist Required:	Tool Study	Level of Sensitivity:	Suggested Sensitivity:	Required level of Assessment	Motivation
Terrestrial Biodiversity Impact Assessment		Very High	Very High	Full Study	The DFFE Screening Tool found that the Relative Terrestrial Biodiversity Sensitivity Theme is Very High-Sensitive. Based on desktop datasets and site sensitivity verification, the site is located within Critical Biodiversity Areas 1 and 2 and Ecological Support Area. Although there have been disturbances on site, the vegetation is indigenous and there are areas which are pristine. Therefore, a Terrestrial Biodiversity Impact Assessment must be undertaken in line with the Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Biodiversity (GN 320, 2020 as amended) to confirm presence of Flora or Fauna, Avifauna, SCC, or protected species within the development site, verify site terrestrial biodiversity sensitivity and provide necessary mitigation measures.
Aquatic Biodiversity Impact Assessment		Very High	Very High	Full Study	Based on the DFFE Screening Tool, the site overlaps very-high sensitive Freshwater Ecosystem Priority Areas (FEPA), rivers and wetlands. Based on the site sensitivity verification, there are several natural and artificial watercourses, wetlands, non-perennial river (Kaboep and Soutputs Se Laagte) and drainage lines occurring within the site. Subsequently, an Aquatic Biodiversity Impact Assessment be undertaken in line with the Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Aquatic Biodiversity (GN 320, 2020 as amended) to amongst others, provide a description of the aquatic biodiversity and ecosystems on the site, the threat status of the ecosystem and species as identified by the screening tool, an indication of the national and provincial priority status of the aquatic ecosystem, a description of the ecological importance and sensitivity of the aquatic ecosystem and a detailed assessment of the potential impacts of the proposed development and buffer requirements.
Noise Impact Assessment		Low	Low	None	The screening tool flagged a noise assessment to be undertaken. Although the drilling of boreholes may cause vibration and noise impacts, this will be limited and temporary. Several noise mitigation measures will be included in the EMP



Screening Specialist Required:	Tool Study	Level of Sensitivity:	Suggested Sensitivity:	Required level of Assessment	Motivation
					and noise impacts on fauna and flora will be assessed by specialists, who will also recommend mitigation measures for inclusion in the EMP.
Radioactivity Impact Assessment		Low	Low	None	The screening tool flagged that a radioactivity assessment will be required. However, radioactivity specialists normally only recommend generic guidelines for certain radiation protection measures to be in place for the prospecting itself, to ensure that the drilling crew do not get doses that are above the public dose limits. Generic guidelines or measures that should be applied to the workers/drilling crew should be developed which will include an outline of the relevant legislation and the safety standards that apply to radiation protection, upon approval of the EA and PR applications. This will be included as a mitigation measure in the EMP to be developed prior to drilling only.
Plant Species Assessment		Medium	High	Full Study	Based on the DFFE Screening Tool, there are sensitive plants species in the area including Sensitive species 1209, 545 and 317 (name withheld to protect the species from illegal harvesting, plant must be protected). Sensitive species, in an ecological context, refers to species that are vulnerable to environmental changes or human impacts and are therefore given special protection or management considerations. Considering that there are areas on indigenous vegetation, intact vegetation (i.e., ridge, there is a likelihood of these species and other sensitive plants being present. Plant species assessment is therefore required as per the Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Plant Species (GN 1150, 2020). This assessment must be covered by the Terrestrial Biodiversity Impact Assessment.



Screening Specialist Required:	Tool Study	Level of Sensitivity:	Suggested Sensitivity:	Required level of Assessment	Motivation
Animal Species Assessment		High	High	Full Study	Based on the DFFE Screening Tool, several high-sensitive animal species are likely to occur on site including the <i>Aves-Falco biarmicus</i> (Lanner Falcon), Vulnerable <i>Aves-Cursorius rufus</i> (Burchell's Courser), Endangered <i>Aves-Neotis ludwigii</i> (Ludwig's bustard) and the as well as medium sensitive for the <i>Aves-Sagittarius serpentarius</i> (Secretarybird) bird species. Although bird species are likely to be minimally impacted due to their adaptation of temporary relocation and returning to an area after activities, other animal species were also noted on site including antelope and rodents which may be more affected by the prospecting activities. Considering the minimal human activities on site and areas of indigenous vegetation, there is a likelihood of these species and other sensitive animal species being present as there is a habitat likely suitable to support these animal species. Animal species assessment is therefore required as per the Protocol for The Specialist Assessment and Minimum Report Content Requirements for Environmental Impacts on Terrestrial Animal Species (GN 1150, 2020). This assessment must be covered by the Terrestrial Biodiversity Impact Assessment.
Civil Theme	Aviation	Low	Low	None	Based on the DFFE Screening Tool, there are no nearby civil aviation facilities to the site. Based on the site sensitivity verification, there were no civil aviation infrastructure or facilities within or near the site. Based on the project description, the project will not transect nor reflect light which may have an impact on civil aviation. The proposed activities will not interfere with surface and/or air transmission and therefore, there are no anticipated impacts on civil aviation emanating from the project. The proposed development does not entail the establishment of high-rise structures, use of aboveground high frequency electromagnetic radiation nor reflecting infrastructure. In addition, the area has low air traffic. Therefore, the proposed activities are assessed to have a low impact on Civil Aviation and no study is required.



Screening Specialist Required:	Tool Study	Level of Sensitivity:	Suggested Sensitivity:	Required level of Assessment	Motivation
Defence Theme		Low	Choose an item.	None	There are no known military bases / facilities present within the vicinity of the project site. The nearest military facilities to the site are located in Upington. There are no anticipated impacts on defence theme emanating from the proposed activities, subsequently, there is no requirement or justification to undertake a Defence Assessment for the project. In addition, the DFFE Screening Tool Report does not indicate Defence Assessment as part of the identified specialists' assessments.