

**PROPOSED PROSPECTING RIGHT WITH BULK SAMPLING  
OVER VARIOUS FARMS IN THE HAY AND KURUMAN  
ADMINISTRATIVE DISTRICTS, NORTHERN CAPE**

**COMMENTS AND RESPONSES REPORT**

**DEPARTMENT REFERENCE NUMBER:**

*NC 30/5/1/1/2/13826 PR*

**NOVEMBER 2024**



**NOTIFICATION OF PROSPECTING RIGHT APPLICATION AND DRAFT SCOPING REPORT TO STAKEHOLDERS AND I&APS DURING PUBLIC PARTICIPATION**

*COMMENTING PERIOD: 22 FEBRUARY – 25 MARCH 2024*

The relevant landowners, stakeholders and I&AP's were informed of the prospecting right application by means of an advertisement in the Noordkaap Bulletin, and on-site notices that were placed at conspicuous places. A notification letter inviting comments on the DSR over a 30-days commenting period (ending 25 March 2024) was sent to the landowners, lawful occupier, neighbouring landowners, stakeholders, and any other I&AP that may be interested in the project. Further to this an advertisement was placed in the Noordkaap Bulletin inviting the surrounding landowners whose contact details could thus far not be obtained to register on the project. All the notices and advertisements were available in both Afrikaans and English. Also refer to Appendix I for the proof of public participation conducted thus far. The following table provides a list of the I&AP's and stakeholders that were informed of the project:

<b>INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING</b>			
<b>STAKEHOLDERS</b>			
<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Klaas Teise	John Taolo Gaetsewe District Municipality	22 February 2024	No Comments received
Mrs Boipelo D Motlhaping	Joe Morolong Local Municipality	22 February 2024	No Comments received

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING****STAKEHOLDERS**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Cllr Tumelo I Gaobuse	Joe Morolong Local Municipality – Ward 4	22 February 2024	No Comments received
Mr Alfred Tieties	ZF Mgcawu District Municipality	22 February 2024	No Comments received
Mr Gaonyadiwe H Mathobela	Tsantsabane Local Municipality	22 February 2024	No Comments received
Cllr. Lindiwe Misah Teise	Tsantsabane Local Municipality – Ward 7	22 February 2024	No Comments received
Mr Isak Visser	Pixley ka Seme District Municipality	22 February 2024	No Comments received
Mr Xolile Geco	Siyancuma Local Municipality	22 February 2024	No Comments received
Mr. Johannes George	Siyancuma Local Municipality Ward 1	22 February 2024	No Comments received
Mr Harry Teko Kolberg	Siyancuma Local Municipality Ward 7		

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING****STAKEHOLDERS**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr W D Mothibi	Department of Agriculture, Land Reform and Rural Development	22 February 2024	No Comments received
Mr B Fisher	Department of Agriculture, Environment Affairs, Rural Development and Land Reform	22 February 2024	No Comments received
Mrs H Samson	Department of Economic Development and Tourism	22 February 2024	No Comments received
Mr Kholekile Nogwili	Department of Roads and Public Works	22 February 2024	No Comments received
Ms Kelebogile Moalosi	Department of Water and Sanitation	22 February 2024	06 May 2024

Me Mudau confirmed on 06 May 2024 that a copy of the scoping report was received by DWS. It was further noted by Me Mudau that a water use authorisation for the prospecting activity is required for the product stockpiles, overburden stockpiles, water evaporation sump.

Greenmined confirmed receipt of the comments on 09 May 2024 and responded that the comments will be shared with the Applicant for his consideration and action once the non-invasive prospecting activities indicated the areas to be sampled (invasive prospecting).

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING****STAKEHOLDERS**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Albanie	Department of Labour	22 February 2024	No Comments received
Khahliso Makale	Eskom	22 February 2024	No Comments received
SAHRIS	South African Heritage Resource Agency	22 February 2024	No Comments received
Pabalelo Mokale	Department of Land Affairs	10 January 2024	15 January 2024

The Commission on Restitution of Land Rights confirmed on 15 January 2024 that no land claims appears on their database in respect of the properties this application extends across.

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
United Manganese of Kalahari (Pty) Ltd	<ul style="list-style-type: none"> <li>• Botha No 313</li> <li>• Portion 1 of Botha No 313</li> <li>• Smartt No 314</li> </ul>	22 February 2024	15 February 2024 & 19 February 2024
<p>Mr Phayane registered as the representative of UMK, following which Mr Mudau requested to be registered as an I&amp;AP on behalf of UMK on 19 February 2024.</p>			
<p>Greenmined acknowledged both registrations and supplied Mr Mudau with a copy of the Regulation 2.2 Project Map. Both parties were invited to comment on the DSR. To date no additional comments were received from UMK.</p>			
<p>On 01 July 2024 Greenmined informed UMK that following a remote surveying exercise it was decided that the farm Botha No 313 will be excluded from any prospecting and/or bulk sampling as this farm did not show any economic viability or quality of the mineral under application (kieselguhr/diatomite). It was noted that this decision will be incorporated and discussed in the draft environmental impact assessment report (DEIAR) that will be available for perusal.</p>			
Kudumane Manganese Resources (Pty) Ltd & Malan Scholes Incorporated	<ul style="list-style-type: none"> <li>• Devon No 277</li> <li>• Portion 2 of York A No 279,</li> <li>• Portion 11 of York A No 279,</li> <li>• Portion 1 of Telele No 312</li> </ul>	22 February 2024	13 February 2024 & 27 February 2024 & 25 March 2024 & 26 March 2024
<p>KMR registered (13 February 2024) as I&amp;AP's on the project and noted that as surface right holder, they appeal the application.</p>			

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<p>Greenmined acknowledged the registration and appeal of KMR. KMR was invited to comment on the DSR.</p>			
<p>On 27 February 2024 Me Ramsay of Malan Scholes Incorporated informed that as KMR is a holder of a mining right (NC 30/5/1/2/2/10053 MR) on the farm Devon No 277 the company is an I&amp;AP and would therefore like to be register on the project. Me Ramsay also enquired/requested the following:</p> <ol style="list-style-type: none"><li>1. confirmation as to whether the Prospecting Right application lodged by K2022641005 (South Africa) Proprietary Limited, has been accepted;</li><li>2. if the Prospecting Right Application has been accepted, please provide a copy of the letter recording the acceptance by the Regional Manager of the Prospecting Right Application; and</li><li>3. a copy of the Scoping Report (and any other relevant documents) prepared by Greenmined Environmental (Pty) Ltd.</li></ol>			
<p>On 28 February 2024, Greenmined acknowledged that KMR is registered as I&amp;AP on the project. Greenmined also responded as follows to the query/request of Me Ramsay:</p> <ol style="list-style-type: none"><li>1. "The application was accepted by the DMRE on 13 December 2023;</li><li>2. Attached (to the response email) please receive a copy of the said acceptance letter;</li></ol> <p>A copy of the draft Scoping Report is available on our website at <a href="http://www.greenmined.com/prospecting-rights/">www.greenmined.com/prospecting-rights/</a> under the heading <i>K2022641005(South Africa) (Pty) Ltd, NC 30/5/1/1/2/13826 PR</i>. However, should you not be able to download the report from the website please let me know and I will gladly supply you with a WeTransfer link to the document. Please note the commenting period on the DSR expires on 25 March 2024 as we have to prepare the Final Scoping Report for timeous submission to the DMRE."</p>			
<p>Additional comments received from Malan Scholes Incorporated on behalf of KMR:</p> <p>"1.1 We act for Kudumane Manganese Resources Proprietary Limited ("KMR").</p>			

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<p>1.2 We refer to your notice dated 22 February 2024 (“22 February Notice”), which enclosed a link containing, inter alia, the draft scoping report (“Draft Scoping Report”) prepared by Greenmined Environmental Proprietary Limited (“Greenmined”), the environmental assessment practitioner (“EAP”) appointed by K2022641005 (South Africa) Proprietary Limited (the “Applicant”), for purposes of the Applicant’s application for an environmental authorisation (“EA Application”) in terms of part 3 of Chapter 4 of the Environmental Impact Assessment Regulations, 2014 (GNR 982 of 4 December 2014), as amended (“EIA Regulations”), published in terms of the provisions of the National Environmental Management Act, 107 of 1998, as amended (“NEMA”). A copy of the 22 February Notice is attached hereto as Annexure “A”.</p> <p>1.3 The EA Application has been submitted by the Applicant in pursuance of a prospecting right (“Prospecting Right Application”) with Department of Mineral Resources and Energy (“DMRE”) reference number: NC 30/5/1/1/2/13826 PR in accordance with section 16 of the Mineral and Petroleum Resources Development Act, 28 of 2002, as amended (“MPRD Act”), inclusive of bulk sampling, for the minerals diatomite, diatomaceous earth and kieselguhr in respect of the following farms –</p> <p>1.3.1 in the Kuruman District –</p> <p>1.3.1.1 Portion 1 and the Remaining Extent of the farm Botha No 313; and</p> <p>1.3.1.2 Portion 1 and the Remaining Extent of farm Devon No 277 (the “Farm Devon”);</p> <p>1.3.2 in the Hay District –</p> <p>1.3.2.1 Portions 4 and 5 of the farm Bermolli No 583;</p> <p>1.3.2.2 Portion 1 and the Remaining Extent of farm Engelsdraai No 221;</p> <p>1.3.2.3 Portion 1 and the Remaining Extent of the farm Witdraai No 204; and</p> <p>1.3.2.4 Portions 1, 2 and the Remaining Extent of the farm Vaalwater No 84;</p> <p>all situated within the Northern Cape Province (“Prospecting Right Area”).</p> <p>1.4 The purpose of this letter is to provide comments, in terms of regulation 43 of the EIA Regulations, by KMR (being a registered interested and affected party (“I&amp;AP”)), in the form of an objection and to bring specific issues to the attention of, inter alia, Greenmined and the DMRE. The comments and objections submitted by KMR are set out in paragraph 2 below.</p>			



**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

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<p>1.5 On 12 February 2024, Tshifhiwa Nemakhavhani (“Nemakhavhani”), a SHERQ Manager employed by KMR, came across the Prospecting Right Application notification (“Prospecting Right Application Notification”) advertised alongside the main entrance gate of the Farm Devon. The Prospecting Right Application Notification advised I&amp;APs of the Applicant’s Prospecting Right Application for the minerals diatomite, diatomaceous earth and kieselguhr, in respect of the Prospecting Right Area. A photograph of the Prospecting Right Application Notification taken by Nemakhavhani on 12 February 2024 is attached hereto as Annexure “B”.</p>			
<p>1.6 Subsequent to KMR becoming aware of the Applicant’s Prospecting Right Application and on 13 February 2024, Baratang Mothobi (“Mothobi”) of KMR, registered KMR as an I&amp;AP. A copy of the email trail in which Mothobi registered KMR as an I&amp;AP as well as confirmation of registration from the EAP, is attached hereto as Annexure “C”.</p>			
<p>1.7 In terms of the Prospecting Right Application Notification, Greenmined advised that the “[D]raft Scoping Report (DSR) will be available for public comment from 22 February 2024”. On 22 February 2024, KMR received an email (“22 February Email”) from the EAP in which to notify KMR that the Draft Scoping Report was now available for comment. A copy of the 22 February Email is attached hereto as Annexure “D”.</p>			
<p>1.8 In light of the fact that KMR was notified in the 22 February Email that the Draft Scoping Report was available for comment from 22 February 2024, KMR’s comments are submitted on 25 March 2024, being within the prescribed 30-day period.</p>			
<p>1.9 KMR is the Holder, as defined in section 1 of the MPRD Act, of a Mining Right (“KMR Mining Right”) for “Manganese Ore” in respect of, inter alia, the Farm Devon 227, situated in the Magisterial District of Kuruman, Northern Cape (“KMR Mining Right Area”). The KMR Mining Right commenced on 20 January 2017 and will continue to be in force for a period of 20 years, ending on 19 January 2037. A copy of the KMR Mining Right is attached hereto as Annexure “E”.</p>			
<p>1.10 KMR subsequently applied for and was granted consent in terms of section 102 of the MPRD Act (“Section 102 Amendment”) to include the minerals “[B]anded Iron Formation, Calcrete and Wesselite” in the KMR Mining Right. A copy of the Section 102 Amendment is attached hereto as Annexure “F”.</p>			
<p>1.11 In addition to being the Holder of the KMR Mining Right, KMR owns the following properties – 1.11.1 Portion 1 and the Remaining Extent of the Farm Devon (which fall within the Applicant’s Prospecting Right Area);</p>			

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<p>1.11.2 Portions 2 and 11 of the Farm York A 279; and 1.11.3 Portion 1 of the farm Telele 312.</p> <p>1.12 In accordance with the KMR Mining Right, KMR - 1.12.1 is currently conducting opencast Mining Operations on the farm Hotazel 280; 1.12.2 is engaged in an exploration campaign which seeks to optimise opencast resources and thereby increase the overall life of mine on the farm Kipling 271 1.12.3 intends to establish a Waste Dump on the Western side of the farm Devon (“Waste Dump”). The Waste Dump is an authorised facility; 1.12.4 intends to conduct concurrent rehabilitation activities at the Devon pit located on the farm Devon; 1.12.5 intends to expand mining operations to the orebody on the farm Devon (including underground mining); and 1.12.6 intends to develop a blasting contractor site on the Eastern side of the farm Devon.</p> <p>1.13 In addition to being the Holder of the KMR Mining Right in respect of the KMR Mining Area, KMR is the Holder of a Mining Right for “Manganese Ore” (“York Mining Right”) in respect of the “Remainder and Portion 1 of the farm Telele No 312, Remainder and Portion 2 of the farm York” situated in the Magisterial District of Kuruman, Northern Cape Province (“York Mining Right Area”). A copy of the York Mining Right is attached hereto as Annexure “G”.</p> <p>1.14 It is evident from the plan attached to the KMR Mining Right, that the KMR Mining Area and the York Mining Area are situated directly opposite one another. In accordance with both the KMR Mining Right and the York Mining Right, KMR intends to – 1.14.1 commence with underground Mining Operations which is intended to stretch from the farm Devon to the farm York; and 1.14.2 migrate the waste collected at the farm York to the farm Devon, once the Waste Dump has been established by KMR. 1.15 Importantly, the underground mining activities on the farm Devon are authorised in KMR’s existing approvals.</p> <p>2 Comments and Objections in respect of the Draft Scoping Report</p> <p>2.1 Premature submission of the EA Application</p>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>2.1.1 According to page 134 of the Applicant’s Draft Scoping Report – “[T]he environmental authorization- and prospecting right application in terms of the NEMA: EIA Regulations, 2014 (as amended) and the MPRDA, 2002 respectively <u>were submitted to the DMRE on 12 October 2023</u> and accepted on 13 December 2023 [our emphasis].”</p> <p>2.1.2 It therefore appears that the Applicant submitted the Prospecting Right Application and the EA Application simultaneously on 12 October 2023.</p> <p>2.1.3 Regulation 16 (2)(a) of the EIA Regulations prescribes that –</p> <p><u>“[A]n application for an environmental authorisation may – (a) where applicable, only be submitted after the acceptance of an application for any right, permission, permit or consent in terms of the Mineral and Petroleum Resources Development Act, 2002 [our emphasis]”.</u></p> <p>2.1.4 The EIA Regulations clearly provide that the Applicant could only submit its EA Application <u>after</u> the acceptance of the Prospecting Right Application by the Regional Manager. Yet, it is clear from the Prospecting Right Application acceptance letter (“Acceptance Letter”), that the Regional Manager only accepted the Applicant’s Prospecting Right Application on 13 December 2023, being some 2 months after the EA Application was submitted by the Applicant. A copy of the Acceptance Letter dated 13 December 2023, is attached hereto as Annexure “H”.</p> <p>2.1.5 In light of the above, it is clear that the Applicant failed to comply with the provisions of regulation 16 of the EIA Regulations. Accordingly, KMR is of the view that the EA Application by the Applicant must be withdrawn and resubmitted by following the appropriate procedure provided for in the EIA Regulations.</p> <p>2.2 Socio-economic Impacts and Benefits</p> <p>2.2.1 In motivating for the need and desirability of the proposed Prospecting Operations by the Applicant, Greenmined on page 35 of the Draft Scoping Report states that the “proposed labour component of the proposed project will be ±15 to 20 labourers that will be hired from the local communities.” Greenmined goes further on page 39 of the Draft Scoping Report to state that “[T]his is of crucial importance in municipal areas with very high unemployment rates.”</p>			

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**TITLE, NAME AND SURNAME**

**AFFILIATION/KEY STAKEHOLDER STATUS**

**CONTACTED DATE**

**RESPONSE RECEIVED**

2.2.2 Appendix 2 to the EIA Regulations outlines the objective of the scoping process contemplated in regulation 21 of the EIA Regulations. Appendix 2 provides that a Scoping Report must “motivate the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location”.

2.2.3 Yet, the Draft Scoping Report provides no detail regarding how the Applicant intends on creating employment opportunities and how the employment of the “±15 to 20 labourers” will in fact benefit the local community.

2.2.4 In respect of the “[O]ption of not implementing the activity (No-go Alternative)”, on page 46 of the Draft Scoping Report, Greenmined states that –

“If the no-go alternative is implemented the land in question cannot be prospected for kieselguhr, which may result in a loss of an economically viable natural resource that can be used in a variety of industries. The no-go option will further entail a loss of employment opportunities, as well as socio-economic benefits and growth development opportunities. Given the high level of unemployment and poverty in the Hay and Kuruman Magisterial Districts the loss of such opportunities is considered significant [our emphasis].”

2.2.5 Without disclosing the anticipated economic, social and growth development opportunities of the project, it impossible to ascertain whether or not proceeding with the proposed Prospecting Operations is preferred over alternative uses of the properties.

2.2.6 In the absence of the aforementioned details, the Applicant has simply failed to motivate the need and desirability of the proposed Prospecting Operations, as required in Appendix 2.

2.2.7 Considering that the proposed Prospecting Operations and possible future Mining Operations are invasive in nature and will result in significant environmental impacts, the Draft Scoping Report must specify, in detail, that the actual anticipated socio-economic benefits, despite the potential environmental impacts, outweigh other possible land uses. This is particularly so considering KMR’s existing rights in respect of the Farm Devon. This is addressed in further detail below.

2.3 Impact of the Applicant’s Prospecting Operations on KMR

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<p>2.3.1 As indicated in paragraph 11.12 above, in accordance with the KMR Mining Right, KMR –</p> <p>2.3.1.1 intends to establish the Waste Dump on the Western side of the farm Devon;</p> <p>2.3.1.2 intends to conduct concurrent rehabilitation activities at the Devon pit located on the farm Devon;</p> <p>2.3.1.3 intends to expand mining operations to the orebody on the farm Devon;</p> <p>2.3.1.4 intends proceeding with underground mining on the farm Devon; and</p> <p>2.3.1.5 intends to develop infrastructure in respect of the proposed underground mining activities on the Eastern side of the farm Devon.</p> <p>2.3.2 On page 3 of the Draft Scoping Report, Greenmined states that – “[T]he proposed activity entails prospecting with bulk sampling. <u>Prospecting will be conducted using a combination of non-invasive and invasive activities. The invasive prospecting will include drilling and trenching.</u> The only other alternative would be to prospect the area without bulk sampling [our emphasis].”</p> <p>2.3.3 Greenmined goes further on page 4 of the Draft Scoping Report to state that – “[T]he Applicant proposes to use <u>air drills for RAB (rotary air blast) drilling and reverse circulation drilling and diamond drill rigs will be used for core drilling.</u> Geophysical equipment will be needed for ground electro-magnetic, magnetic and gravity surveys.</p> <p>The <u>bulk sampling trenches/pits will be dug by excavator,</u> upon which the loosened material will be moved by FEL to the crushing/milling plant. The material will be crushed, screened, and sized to stockpiles from where it will be transported off-site by trucks [our emphasis].”</p> <p>2.3.4 It is therefore clear that the proposed Prospecting Operations by the Applicant will directly impact on KMR’s existing and future operations on the Farm Devon.</p> <p>2.3.5 On page 40 of the Draft Scoping Report, Greenmined states that – “[D]ue to the nature of invasive prospecting activities, the location of drill holes and sampling sites can to a certain extent be moved to avoid structures and/or sensitive areas where possible.”</p> <p>2.3.6 Yet, Greenmined fails to provide I&amp;APs with any drill site coordinates in respect of the Prospecting Right Area. Considering that the Applicant’s EA Application Area relates to, inter alia, Portion 1 and the Remaining Extent of the Farm Devon, it is inevitable that the proposed drillholes will be located within the KMR Mining Right Area.</p>			

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<p>2.3.7 In fact, on page 131 of the Draft Scoping Report, Greenmined states that the “preferred drilling, trenching and pitting locations will be determined following the outcome of phases 1 &amp; 2 and the mapping of geological survey data.” It is submitted that the DMRE cannot make an informed decision on the Applicant’s EA Application or the Prospecting Right Application if the proposed drill site coordinates are not provided to both the DMRE and I&amp;APs. The drill site coordinates cannot be determined subsequent to the granting of the EA Application to the Applicant.</p>			
<p>2.3.8 KMR, as an I&amp;AP, is entitled to all the information relating to the proposed Prospecting Operations by the Applicant, which includes KMR being provided with the exact co-ordinates at which the Applicant intends on conducting Prospecting Operations.</p>			
<p>2.3.9 It is self-evident that drilling activities cannot be permitted above the areas where KMR will be conducting (authorised) underground mining and / or in close proximity to the Waste Dump and KMR’s surface infrastructure. The health, safety and environmental impacts of any simultaneous operations must be considered by the Applicant in its EA Application. It appears that the Applicant has no intention of assessing these impacts.</p>			
<p>2.3.10 The failure by Greenmined and the Applicant to provide KMR with the necessary information relating to the intended prospecting activities by the Applicant, means that KMR cannot assess the potential impacts of the proposed Prospecting Operations and bulk sampling on KMR, both as the Holder of the KMR Mining Right and the owner of Portion 1 and the Remaining Extent of the Farm Devon.</p>			
<p>2.3.11 It is submitted by KMR that it would be impossible for KMR to conduct its intended future operations on the Farm Devon and the farm York in circumstances where the Applicant is conducting drilling and bulk sampling.</p>			
<p>2.4 Failure to apply for a Waste Management Licence in terms of the National Environmental Management: Waste Act, 29 of 2008, as amended (“NEM:WA”)</p>			
<p>2.4.1 On the cover page (page 13) of the Draft Scoping Report, Greenmined states that the EA Application is submitted by the Applicant in terms of NEMA and in terms of the provisions of NEM:WA. It is clear that Greenmined intends to submit the EA Application on behalf of the Applicant as an integrated environmental authorisation application.</p>			

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<p>2.4.2 In terms of section 24L (1) of NEMA – “[A] competent authority empowered under Chapter 5 to issue an environmental authorisation and any other authority empowered under a specific environmental management Act may agree to issue an <u>integrated environmental authorisation</u> [our emphasis].”</p> <p>2.4.3 Yet, despite referring to an integrated environmental authorisation on the cover page of the Draft Scoping Report, no further references are made to an integrated environmental authorisation application by Greenmined.</p> <p>2.4.4 In fact, on page 20 to 21 of the Draft Scoping Report in highlighting the “[L]isted and specified activities triggered by the proposed activities”, Greenmined fails to refer to which activities listed in the List of waste management activities that have, or are likely to have, a detrimental effect on the environment (GN 921 of 29 November 2013) (“List of Waste Management Activities”), will be triggered as a result of the proposed Prospecting Operations and bulk sampling by the Applicant.</p> <p>2.4.5 On page 26 of the Draft Scoping Report, Greenmined states that - “any available topsoil in the earmarked areas will be <u>stripped and stockpiled for the duration of the activities</u>. Topsoil removal will be restricted to the exact footprint of each prospecting site during the invasive phases of the activity. <u>The topsoil will be stockpiled at a designated signposted area to be replaced during the rehabilitation of the area</u> [our emphasis].”</p> <p>2.4.6 Further on page 45 of the Draft Scoping Report, Greenmined states that – “[T]he bulk sampling trenches/pits will be dug by excavator, upon which the loosened material will be moved by FEL to the crushing/milling plant. The material will be <u>crushed, screened, and sized to stockpiles from where it will be transported off-site by trucks</u> [our emphasis].</p> <p>2.4.7 In the context of NEM:WA, a residue stockpile is defined as “any debris, discard, tailings, slimes, screening, slurry, waste rock, foundry sand, beneficiation plant waste, ash or any other product derived from or incidental to a mining operation and which is stockpiled, stored or accumulated for potential re-use, or which is disposed of, by the holder of a mining right, mining permit, production right or an old order right [our emphasis]”.</p> <p>2.4.8 Considering the broad definition of residue stockpile, it is clear that the stockpiles referred to in the Draft Scoping Report will trigger the listed activity relating to the establishment of a residue stockpile referenced in NEM:WA and its relevant listing notice. KMR therefore submits that Greenmined and the Applicant are required to apply for a waste management licence and are required to do so simultaneously with the EA Application.</p>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>2.5 Failure to apply for a water use licence (“WUL”) in terms of the National Water Act, 36 of 1998, as amended (“NWA”)</p> <p>2.5.1 On page 106 of the Draft Scoping Report, Greenmined states as follows – “[A] hydrologist will be contracted to undertake a desktop Freshwater Assessment (wetland and aquatic) of the study area during the EIA process. The scope of work includes a desktop based investigation of the watercourses and wetlands within the study area supported by a site verification visit...The report will be compiled in accordance with the requirements in the latest NEMA Minimum Requirements and Protocol for Specialist Aquatic Biodiversity Impact Assessment as contained in the “Procedures to be followed for the assessment and minimum criteria for reporting of identified environmental themes of Section 45 (a) and (h) of the National Environmental Management Act, 1998, when applying for Environmental Authorization”, contained in Government Gazette No. 43855 (30 October 2020) and the requirements of the <u>Department of Water &amp; Sanitation for Water Use Licensing, as outlined in the ‘Regulations Regarding the Procedural Requirements for Water Use License Applications and Appeals’ contained in the Government Gazette No. 40713 of 24 March 2017 [our emphasis].”</u></p> <p>2.5.2 It is further stated on page 124 of the Draft Scoping Report that – “[S]hould a water use authorisation be applicable to the project, the PR Holder must always adhere to the conditions thereof.”</p> <p>2.5.3 Significantly, in paragraph 2(b) of the Acceptance Letter (attached hereto as Annexure “H”), the Regional Manager directs the Applicant to “[L]odge an application in terms of the National Water Act No.36 of 1998 with the Department of Water Affairs with immediate effect”. Despite being directed to apply for a WUL in terms of the NWA “with immediate effect”, KMR has not been notified of any such WUL application.</p> <p>2.5.4 On page 30 of the Draft Scoping Report states that – “[T]he drilling operation requires ±1 000 l of water day while the bulk sampling activities will necessitate ±10 000 l/day. Water will also be used for dust suppression at the prospecting sites and access roads. <u>Potable water will daily be transported to site by the employees, while the process water will be bought from a local sources (to be identified) in the vicinity of the prospecting activities and transported to site in a water truck(s) [our emphasis].”</u></p> <p>2.5.5 The Draft Scoping Report fails to specify –</p> <p>2.5.5.1 which local “source” the Applicant intends to make use of; and</p> <p>2.5.5.2 if the local source is able to meet the water quality and quantity required by the Applicant.</p>			



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<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
3 Conclusion  3.1 It is evident from the comments in paragraph Error! Reference source not found. That the Applicant's EA Application and the Draft Scoping Report are flawed due to a failure to comply with the EIA Regulations and to disclose critical information to I&APs. It is submitted by KMR that the Draft Scoping Report should be rejected by the DMRE.  3.2 As provided in regulation 44 of the EIA Regulations, these comments must be recorded in the reports and plans to be submitted to the competent authority pursuant to the EA Application.  3.3 If the Draft Scoping Report is accepted by the DMRE (which decision would, in KMR's view, be unlawful), KMR reserves the right to challenge such decision and to comment on any environmental impact assessment report and environmental management programme relating to the EA Application."			
Greenmined responded (26 March 2024) to the comments received from Malan Scholes Incorporated as follows:  "Greenmined herewith acknowledge receipt of your correspondence dated 25 March 2024 on behalf of KMR regarding the prospecting right application submitted by K2022641005 (South Africa) (Pty) Ltd over various properties in the Hay and Kuruman Districts. We thank you for taking part in the public participation process and the comments submitted on the draft scoping report (DSR).  We take note of your concerns, and incorporated the comments into the Final Scoping Report that will be submitted to the Department of Mineral Resources and Energy (DMRE) for consideration. All comments/objections will be discussed with the Applicant, and specialists of the project team for their perusal and input. The comments/objections will further be assessed and responded to in the Draft Environmental Impact Assessment Report. All comments, concerns and/or objections received as part of the public participation process will be listed in the EIA documents to be submitted to the DMRE for consideration."			

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Additional response to the above-mentioned comments of Malan Scholes Incorporated that appeared in the FSR:

*Paragraph 2.1.1 – 2.1.5 Premature submission of the EA Application:*

Since the One Environmental System came into effect on 08 December 2014, the Ministers of the Mineral Resources and Energy, Environmental Affairs, and Water agreed to streamline the environmental approvals, monitoring, and enforcement for mining related applications. A key feature of the OES is that the Minister of Mineral Resources is the competent authority under NEMA for the issuing of EAs to authorise listed activities that is directly related to a) prospecting or exploration of a mineral; or b) extraction and primary processing of a mineral. Subsequently, the DMRE requires all applicants to submit the EA Application simultaneously with the Prospecting/Mining Right Application on the departmental online platform known as SAMRAD. Prospecting/Mining Right applications that are not accompanied by an EA Application are deemed incomplete. Therefore, in terms of the DMRE requirements, there is no grounds for the claim that the EA Application was submitted prematurely, and or wrongfully accepted by the DMRE.

*Paragraph 2.2.1 – 2.2.7 Socio-economic Impacts and Benefits; and Paragraph 2.3.1 – 2.3.11 Impact on the Applicant's Prospecting Operations on KMR:*

To give meaningful response the results of the specialist studies are needed and therefore all inputs received during the public participation process will be assessed and/or responded to in the DEIAR. The aim of the scoping report is to identify the aspects to be evaluated in the assessment phase. The aim of the EIAR, in contrast, is to determine the nature, significance, consequence, extent, duration, and probability of the impacts occurring to inform identified preferred alternatives, and the degree to which these impacts can be reversed, avoided, managed, or mitigated.

As mentioned earlier, should this application be successful, and the invasive prospecting commence, the Applicant will engage the landowners of the PR footprint regarding technical arrangements for the co-existence of the applicable entities on the same land. These negotiations will in particular consider the mining operations on the farms Devon No 277, Botha No 313, and Bermolli No 583 owned by mining companies.

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**RESPONSE RECEIVED**

*Paragraph 2.4.1 – 2.4.8 Failure to apply for a Waste Management Licence in terms of the NEM:WA:*

Page 14 of the Scoping Report (DSR & FSR) notes that: *“In terms of section 16(3)(b) of the EIA Regulations, 2014, any report submitted as part of an application must be prepared in a format that may be determined by the Competent Authority and in terms of section 17 (1) (c) the competent Authority must check whether the application has taken into account any minimum requirements applicable, or instructions or guidance provided by the competent authority to the submission of applications. It is therefore an instruction that the prescribed reports required in respect of applications for an environmental authorisation for listed activities triggered by an application for a right or permit are submitted in the exact format of and provide all the information required in terms of this template. Furthermore, please be advised that failure to submit the information required in the format provided in this template will be regarded as a failure to meet requirements of the Regulation and will lead to the Environmental Authorisation being refused.”*

Considering this, the Scoping Report format is prescribed by the DMRE and may not be altered by the EAP. The cover page (page 13) referred to by Malan Scholes Incorporated is part of the prescribed DMRE scoping report format for applications in terms of the NEMA, and/or NEM:WA in respect of listed activities that have been triggered in terms of the MPRDA. The proposed prospecting right application does not trigger listed activities in terms of the NEM:WA nor is there a need for an integrated environmental authorisation and therefore the EA Application did not consider such listed activities.

*Paragraph 2.5.1 – 2.5.5.2 Failure to apply for a water use licence in terms of the NWA:*

Presently it is not expected that the proposed prospecting activities will trigger listed activities in terms of the NWA should the mitigation measures, buffer zones and recommendations of the specialists (to be incorporated into the DEIAR) be implemented. The mitigation measures of the DEIAR will elaborate on the water use of the proposed activities to ensure compliance of the project with the relevant legislation.

On 26 March 2024 Malan Scholes Incorporated notified Greenmined that KMR intends to lodge an appeal to the Director-General of the DMRE as well as the Regional Manager of the DMRE-NC in accordance with the provisions of section 96 of the MPRDA as read with regulation 94 of the regulations promulgated under the MPRDA (as amended) against the acceptance of the Applicant's prospecting right application. Said appeal was submitted to the relevant parties on the same day.

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<p>On 01 July 2024 Greenmined informed Malan Scoles Incorporated and KMR that following a remote surveying exercise it was decided that the Remaining Extent of the farm Devon No 277 will be excluded from any prospecting and/or bulk sampling as this farm did not show any economically viability or quality of the mineral under application (kieselguhr/diatomite). It was noted that this decision will be incorporated and discussed in the draft environmental impact assessment report (DEIAR) that will be available for perusal.</p> <p>Additional response to the above comments received from Malan Scholes Incorporated (on the DSR) upon compilation of the DEIAR;</p> <p><u>Paragraph 2.2 &amp; 2.3:</u></p> <p>As stipulated in <i>Part A(1)(g)(i) Details of the development footprint alternatives considered - c) Design and Layout of the Activity</i>, although potential target areas were identified on the farms Devon No 277 and Botha No 313, both farms (including all relevant portions and remainders) were subsequently excluded from the invasive prospecting and/or bulk sampling programme, thereby removing the potential impact that the proposed activities may have on the KMR operations.</p> <p>Also refer to:</p> <ul style="list-style-type: none"><li>• <i>Part A(1)(f) Need and desirability of the proposed activities.</i></li><li>• <i>Part A(1)(g)(iv)(1)(a) Type of environment affected by the proposed activity – 11 Socio-Economic Environment.</i></li><li>• <i>Part A(1)(u)(i)(1) Impact on socio-economic conditions of any directly affected person.</i></li></ul> <p><u>Paragraph 2.5:</u></p> <p>Refer to the following sections (amongst others) where the possibility for a water use authorisation are discussed:</p> <ul style="list-style-type: none"><li>• <i>Part A(1)(e) Policy and Legislative Context.</i></li><li>• <i>Part A(1)(g)(iv)(c) Description of specific environmental features and infrastructure on the site - Site Specific Hydrology.</i></li><li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk.</i></li><li>• <i>Part A(1)(j) Summary of specialist reports.</i></li></ul>			

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<ul style="list-style-type: none"> <li>• <i>Part A(1)(k)(i) Summary of the key findings of the environmental impact assessment.</i></li> <li>• <i>Part B(1)(d)(viii) Has a water use license been applied for?</i></li> </ul>			
<p>On 10 September 2024, DMRE Legal Services (National) informed the Applicant that the application in terms of Section 96(2) of the MPRDA by KMR was granted and therefore subsequently suspends the decision of the DMRE-NC to accept the prospecting right application. Following discussions with the national and regional DMRE offices, the Applicant lodged its own Section 96 appeal against the decision of the DMRE (National) to suspend the acceptance letter on the basis that the farm Devon No 277 will be omitted from the prospecting right application. This application is pending with the DMRE.</p> <p>The proposal (to omit the said farm) was accordingly incorporated into this document, specifically in <i>Part A(1)(g)(i) Details of the development footprint alternatives considered</i>. Following discussions with the DMRE-NC (competent authority) it was confirmed that the public participation process can continue while the Applicant's Section 96 application is being considered by the DMRE (National).</p>			
Transnet Ltd	<ul style="list-style-type: none"> <li>• Portion 1 of Devon No 277</li> <li>• Portion 1 of Perth No 276</li> <li>• Portion 3 of York A No 279</li> </ul>	22 February 2024	07 March 2024
<p>Comments received from Transnet on 07 March 2024:</p> <p>“The proposed prospecting area shown in Figure 1 below crosses over Transnet’s cadastral boundary and therefore will affect Transnet. The red polygon indicates the Prospecting right application area numbered from A to N. The green lines denotes Transnet cadastral boundary. This is directly south of the Hotazel Station precinct and crosses the railway line over Land Asset No. KHX0327 being PTN 1 of the farm Devon No 277, Admin District Kuruman in the Joe Morolong Municipal area. The dark blue line denotes a pipeline servitude 4 km in length that requires confirmation by TFR, whether still in use or not.</p> <p>We hereby wish to draw the attention of the applicant to Section 48(1) of the Minerals and Petroleum Resources Development Act, 2002 which stipulates as follows:</p>			

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<p><i>“48(1) Subject to section 20 of the National Parks Act, 1976 (Act No 57 of 1976), and subsection (2), no reconnaissance permission, prospecting right, mining right or mining permit may be issued in respect of-</i></p> <ul style="list-style-type: none"><li><i>(a) land comprising a residential area;</i></li><li><i>(b) any public road, railway, or cemetery;</i></li><li><i>(c) any land being used for public or government purposes or reserved in terms of any other law; or</i></li><li><i>(d) areas identified by the Minister by notice in the Gazette in terms of section 49.”</i></li></ul> <p>Please note that under no circumstances will or do Transnet SOC permit, grant permission or consent to any prospecting or mining activities on its properties. As far as the adjacent properties to the railway line is concerned, your attention is drawn to Regulation 17(6)(a) of the Mine Health and Safety Act, 1996 which determines that no mining operations may be carried out under or within a horizontal distance of 100 m from buildings, roads, railways, reserves etcetera.</p> <p>Figure 1:</p>			

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The four red polygons below in Figure 2 denotes a further 4 proposed protecting areas. These 4 proposed prospecting areas are  $\pm 25.5$  km's south of Postmasburg station and  $\pm 28$  km's east of the Sishen to Saldanha ORE line and will thus not affect Transnet.

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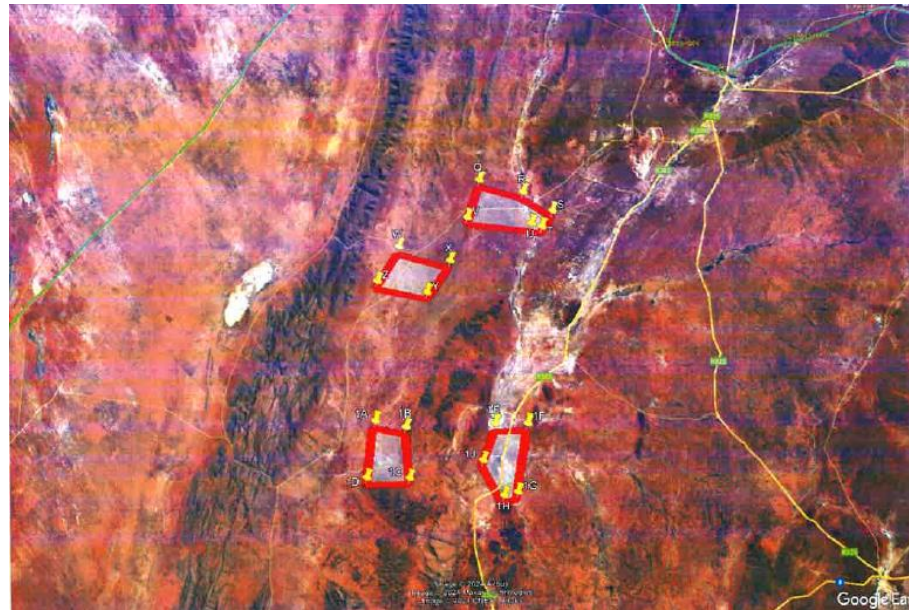
**TITLE, NAME AND SURNAME**

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**RESPONSE RECEIVED**

Figure 2:



Greenmined responded as follows on 13 March 2024 to the comments received from Transnet:

“Thank you for your correspondence on the prospecting right (PR) application submitted by K2022641005 (South Africa) (Pty) Ltd over (amongst others) the farm Devon No 277. We do take note that no prospecting will be allowed within a horizontal distance of 100 m from the railway line, and has also shared this with the Applicant.



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<p>The Applicant confirmed that should the PR application be successful, they will declare/demarcate a no-go buffer zone of a 110 m around the railway line (crossing through Devon No 277) and that no prospecting will be done/allowed within this buffer area. This commitment will also be added to the Final Scoping Report to be submitted to the DMRE for approval, and should the FSR be approved, the commitment will also be incorporated into the Environmental Impact Assessment Report and Environmental Management Programme also to be approved by the DMRE.</p>			
<p>In short, should this prospecting right application be approved, we do confirm that no prospecting will occur within 110 m of the railway line crossing through Devon No 277.”</p>			
<p>On 01 July 2024 Greenmined informed Transnet that following a remote surveying exercise it was decided that Portion 1 of the farm Devon No 277 will be excluded from any prospecting and/or bulk sampling as this farm did not show any economically viability or quality of the mineral under application (kieselguhr/diatomite). It was noted that this decision will be incorporated and discussed in the draft environmental impact assessment report (DEIAR) that will be available for perusal.</p>			
<p>Considering the above the potential impact that prospecting may have had on the railway infrastructure has been removed.</p>			
<p>Mr PJ van der Byl Lambrechts &amp; Me C Lambrechts</p>	<p>Portion 4 of Bermolli No 583</p>	<p>Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) &amp; emailed 05 March 2024</p>	<p>05 March 2024</p>
<p>Me Lambrechts registered as I&amp;AP on the project.</p>			
<p>Greenmined acknowledged receipt of the registration on 06 March 2024.</p>			
<p>Sishen Iron Ore Company (Pty) Ltd &amp; CDH</p>	<ul style="list-style-type: none"> <li>• Portion 5 of Bermolli No 583</li> <li>• RE of Farm No 542,</li> <li>• Portion 2 of Farm No 542</li> </ul>	<p>22 February 2024</p>	<p>26 February 2024 &amp; 25 March 2024</p>

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	<ul style="list-style-type: none"> <li>• Portion 3 of Farm No 542</li> </ul>		

Comments received from SIOC on 26 February 2024:

“Please note that Sishen Iron Ore Company (SIOC) is an interested and affected party (“I&AP”) K2022641005 in respect of the prospecting right/bulk sampling application submitted by (South Africa) (PTY) LTD with reference number NC 30/5/1/1/2/13826 PR.

SIOC hereby requests that it be registered as an I&AP as part of this application, with the following information:

<b>Name</b>	Izak Gous
<b>Organisation</b>	SIOC, Kolomela Mine
<b>Telephone</b>	0605016625
<b>Fax</b>	NA
<b>Cell</b>	0605016625
<b>Postal address</b>	Private Bag X3003
<b>Physical address</b>	21 Main Street Postmasburg
<b>Email</b>	Izak.gous@angloamerican.com
<b>Preferred method of communication</b>	Email

Please provide information on the following aspects:

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<p>1. Ground water quantity and quality</p> <ul style="list-style-type: none"><li>a. What water sources will be used to conduct the planned activities. What measures will be undertaken to monitor possible impacts (ground and surface water) and what mitigation measures will be implemented in impacted areas.</li><li>b. What volume of water will be abstracted per locality.</li><li>c. What measures will be implemented to ensure effective monitoring of water quality on site as well as on neighboring properties.</li></ul> <p>2. Air quality management</p> <ul style="list-style-type: none"><li>a. What measures will be implemented to ensure dust are adequately monitored and effectively controlled?</li></ul> <p>3. Access road</p> <ul style="list-style-type: none"><li>a. The additional traffic might detrimentally impact the condition of the R383 and subsequently impact road safety for other users.</li></ul> <p>4. Security and access control</p> <ul style="list-style-type: none"><li>a. How will access to the site be managed?</li><li>b. What measures will be put in place to ensure the safety and security of neighboring landowners will not be compromised?</li></ul> <p>5. Veld fire management</p> <ul style="list-style-type: none"><li>a. What measures will be put in place to prevent fires, and if a fire does occur, will a competent team be available to respond to the fire.</li></ul> <p>6. Waste management</p> <ul style="list-style-type: none"><li>a. What measures will be implemented to ensure sound waste management practices.</li></ul> <p>7. Hygiene</p> <ul style="list-style-type: none"><li>a. Will sanitation facilities be made available to the workforce. How will this process be managed.</li></ul>			

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<p>8. Physical environment</p> <ul style="list-style-type: none"><li>a. What will be done to minimize the physical footprint of the planned project. This refers to access roads, drilling sites and laydown areas among others.</li><li>b. What measures will be implemented to ensure all nationally and provincially protected fauna and flora species are correctly identified and protected during the project.</li><li>c. Indicate where maintenance on equipment will be done during this project.</li><li>d. How will an environmental emergency such as hydrocarbon contamination be address.</li><li>e. Describe the planned refuelling process.</li></ul> <p>In addition to the above, please provide us with any other applicable information to the project. Please also confirm that SIOC has now been registered as an I&amp;AP in accordance with the information set out in the table above.”</p>			
<p>Greenmined further responded (04 March 2024) to SIOC’s comments as listed below:</p> <p>“Thank you for taking part in the public participation process of this prospecting right application submitted by K2022641005 (South Africa) (Pty) Ltd with reference number NC 30/5/1/1/2/13826 PR.</p> <p>We do acknowledge receipt of your comments that will also be incorporated into the Final Scoping Report, that will be submitted for approval to the Department of Mineral Resources and Energy (DMRE). Due to the technical nature of the comments it will be assessed and responded to in the Draft Environmental Impact Assessment Report (DEIAR), which report will follow should the DMRE approve the final Scoping Report. The DEIAR will furthermore incorporate the applicable specialist studies that will also consider the comments received from SIOC. As registered, I&amp;AP, SIOC will be invited to comment on the DEIAR once available.”</p>			
<p>Additional comments received from CDH on behalf of SIOC on 25 March 2024:</p> <p>“1 We act on behalf and on the instructions of Sishen Iron Ore Company ("SIOC/Client"), a private company with limited liability, registered as such in accordance with the laws of the Republic of South Africa, with registration number 2000/011085/07.</p>			

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<p>2 SIOC operates the Kolomela Mine in terms of a mining right, with DMRE reference number NC 30/5/1/2/2/069 MR ("Kolomela Mining Right"), consisting of the sole and exclusive right to mine iron ore on and under a number of properties. SIOC is also the surface rights holder of the following properties –</p> <p>2.1 Portion 5 of Farm Bermolli 583; 2.2 Remaining Extent of Farm No 542, 2.3 Portion 2 of Farm No 542; and 2.4 Portion 3 of Farm No 543</p> <p>3 The Applicant applied for a prospecting right with bulk sampling for kieselguhr over various properties ("PR Application"). In terms of section 16(1) of the Mineral and Petroleum Resources Development Act 28 of 2002 ("MPRDA"), the Applicant would need to obtain the necessary environmental authorisations, approvals, licences and/or consents as prescribed under the National Environmental Management Act 107 of 1998 ("NEMA") and the Environmental Impact Assessment Regulations, 2014, as amended ("EIA Regulations"), prior to commencement of any prospecting related activities. Given this, the Applicant attended to the submission of the environmental authorisation application ("EA Application").</p> <p>4 SIOC has obtained various biodiversity permits and licences in terms of the Northern Cape Nature Conservation Act 9 of 2009 and National Forest Act 84 of 1998 since the commencement of operations at the Kolomela Mine in 2011.</p> <p>5 The Northern Cape Department of Agriculture, Environmental Affairs, Rural Development and Land Reform ("DAERL") informed SIOC in 2014 that the cumulative impacts of the various biodiversity permits will be taken into account and may require a biodiversity off-set in relation to the mining activities associated with the Kolomela Mining Right. In 2019 DAERL confirmed that a biodiversity off-set will need to be established by SIOC and as part of this obligation, SIOC has engaged extensively with DAERL and Northern Cape Protected Area Expansion Review Committee ("NCPAERC"), which engagement has included the acceptance of several properties as being suitable for biodiversity offset purposes given its current ecological sensitivity ("Kolomela Biodiversity Off-Set Areas"). The acceptance of the Kolomela Biodiversity Off-Set Areas is attached hereto as Annexure "A".</p> <p>6 The Kolomela Biodiversity Off-Set Areas include Portion 4 and 5 of Farm Bermolli 583. Based on correspondence received from the relevant authorities, once the required administrative processes have been completed the proposed Kolomela Biodiversity Off-Set Areas are set to be formally declared as a nature reserve under the National Environmental Management Protected Areas Act 57 of 2003.</p>			

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7 We also thought it pertinent to highlight that the Department of Forest, Fisheries and Environment ("DFFE") as well as the DAERL are both in agreement that, considering the pending declaration of the Kolomela Biodiversity Off-Set Areas as a nature reserve, no mining or prospecting related activities are allowed to be conducted over these properties.

8 The DFFE and DAERL recently objected against the grant of an environmental authorisation for a mining right application in relation to Portion 5 of the Farm Bermolli and another property set to be included within the proposed Kolomela Biodiversity Off-Set Areas. Although the objections were made in relation to a mining right application, the same stance will be applicable to this prospecting right application as prospecting is a precursor to mining. The objections by the DFFE and DAERL are attached hereto as Annexure "B" and Annexure "C" respectively.

9 We attended to the review of the Draft Scoping Report and have the following comments, questions and queries in relation to the report. We would be grateful to receive Greenminded's responses to each of the queries as indicated in the table below –

Item	Query	Greenmined Response
1.	<p>Given the identified Kolomela Biodiversity Off-Set Areas and the current position of the DFFE and DAERL against any mining or prospecting in relation to the Kolomela Biodiversity Off-Set Areas, we kindly request that Portion 4 of the Farm Bermolli and Portion 5 of the Farm Bermolli be excluded from this EA Application as well as the PR Application.</p>	
2.	<p>We note that the No-Go Alternative as discussed on pages 5 and 46 of the Draft Scoping Report fails to make any mention of the proposed Kolomela Biodiversity Off-Set Areas planned over Portion 4 and Portion 5 of the Farm Bermolli.</p> <p>We recommend that the No-Go Alternative should include that a nature reserve is set to be established on Portion 4 and Portion 5 of the Farm Bermolli. The current No-Go Alternative is misleading and fails to provide all the required information to the competent authority.</p>	
3.	<p>We note that pages 5 and 46 of the Draft Scoping Report provide that an advertisement is set to be published in the Noorkaap Bulletin. We further note that Appendix 5 provides an example of the advertisement.</p> <p>The Draft Scoping Report as well as the annexures thereto fail to provide any proof of publication of the advertisement. We kindly request to be provided with proof of publication of said advertisement.</p>	

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
4.	<p>We note that page 31 of the Draft Scoping Report provides that 4 x 30 ton flatbed trucks will be required to transport prospecting and bulk sampling material.</p> <p>Given the size of the trucks, will the expansion of the existing roads be required and has this been considered as a potential listed activity under the EIA Regulations?</p>		
Item	Query	Greenmined Response	
5.	<p>We note that the Draft Scoping Report includes various references as well as figures captured from the DFFE Screening Report.</p> <p>The Draft Scoping Report as well as the annexures thereto made available during the public participation process fail to include the DFFE Screening Report. We kindly request to be provided with a copy of the DFFE Screening Report.</p>		

10 Thank you for the opportunity to comment on the Draft Scoping Report and we look forward to your responses to our queries.

11 Should you have any further queries, please do not hesitate to contact us.”



**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

**TITLE, NAME AND SURNAME**

**AFFILIATION/KEY STAKEHOLDER STATUS**

**CONTACTED DATE**

**RESPONSE RECEIVED**

Greenmined responded, on 26 March 2024, as listed below to the comments received from CDH on 25 March 2024:

“Greenmined herewith acknowledge receipt of your correspondence dated 25 March 2024 on behalf of SIOC regarding the prospecting right application submitted by K2022641005 (South Africa) (Pty) Ltd over various properties in the Hay and Kuruman Districts. We thank you for the valuable information provided that has also been shared with the Applicant.

Your correspondence was incorporated into the final Scoping Report that must be submitted to the DMRE for consideration by 29 March 2024. As a result of the strict tight timeframes on the scoping phase of an environmental impact assessment (EIA), your correspondence cannot be answered in detail in this phase of the EIA, however the following sections of the final Scoping Report were amended to allow for the assessment of your comments should the DMRE approve the scoping report and allow the EIA process to continue:

- Section 2(f) Need and desirability of the proposed activities;
- Section 2(h)(i)(c) Design and layout of the activity;
- Section 2(h)(iv)(1)(b) Description of the current land uses;
- Section 2(h)(iv)(1)(c) Description of specific environmental features and infrastructure on the site – Site Specific Groundcover and Biodiversity Conservation Areas;
- Section 2(i) Impacts Identified;
- Section 3(i) Measures to avoid, reverse, mitigate, or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored;
- Section 3(k) Other matters required in terms of section 24(4)(a) and (b) of the Act.

Please take note that all your comments and enquires will be assessed and responded to in the Draft Environmental Impact Assessment Report (DEIAR) that will also incorporate specialist studies and recommendations.

As you are aware SIOC is a registered I&AP on this project to which the contact details of CDH were added. Hence forth we will keep both SIOC and CDH informed on the progress of the EIA as well as afford you an opportunity to comment on the DEIAR should the DMRE approve the final Scoping Report.

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>For ease of reference please find attached proof of the advertisements that appeared in the Noordkaap Bulletin.</p> <p>As Portion 4 and 5 of Bermolli No 583 has not yet been declared a nature reserve as part of the Kolomela Biodiversity Offset Area we advise that you take note of the consultation requirements stipulated in Sections 32 and 33 of the Protected Areas Act, 2003 (Act No 57 of 2003) attached hereto for ease of reference.”</p>			
<p>Further response to the comments received from CDH on behalf of SIOC:</p> <ol style="list-style-type: none"> <li> <p><i>Given the identified Kolomela Biodiversity Off-Set Areas and the current position of the DFFE and DAERL against any mining or prospecting in relation to the Kolomela Biodiversity Off-Set Areas, we kindly request that Portion 4 of the Farm Bermolli and Portion 5 of the Farm Bermolli be excluded from this EA Application as well as the PR Application.</i></p> <p>It was noted that both the DFFE and DAERL letters attached to the correspondence received from CDH only mention Portion 5 of Bermolli No 583 amongst the other properties listed in the letters. Portion 4 of Bermolli No 583 is not mentioned in the said letters. It is also clear from the correspondence received from CDH that Portion 5 (and Portion 4) of Bermolli No 583 is still “candidate” offset receiving areas and that these areas has not yet been declared as biodiversity offset area/nature reserve. However, the matter will be considered during the EIA process and design/layout alternatives will be contemplated. The outcome will be discussed in the DEIAR.</p> </li> <li> <p><i>We note that the No-Go Alternative as discussed on pages 5 and 46 of the Draft Scoping Report fails to make any mention of the proposed Kolomela Biodiversity Off-Set Areas planned over Portion 4 and Portion 5 of the Farm Bermolli. We recommend that the No-Go Alternative should include that a nature reserve is set to be established on Portion 4 and Portion 5 of the Farm Bermolli. The current No-Go Alternative is misleading and fails to provide all the required information to the competent authority.</i></p> <p>The proposed declaration of Portion 4 and 5 of Bermolli No 583 as part of the Kolomela Biodiversity Offset Area was added to the final scoping report under the following sections:</p> <ul style="list-style-type: none"> <li><i>Section 2(f) Need and desirability of the proposed activities;</i></li> </ul> </li> </ol>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<ul style="list-style-type: none"> <li>• Section 2(h)(i)(c) Design and layout of the activity;</li> <li>• Section 2(h)(iv)(1)(b) Description of the current land uses;</li> <li>• Section 2(h)(iv)(1)(c) Description of specific environmental features and infrastructure on the site – Site Specific Terrestrial Biodiversity, Conservation Areas, Groundcover and Fauna;</li> <li>• Section 2(i) Impacts Identified;</li> <li>• Section 3(i) Measures to avoid, reverse, mitigate, or manage identified impacts and to determine the extent of the residual risks that need to be managed and monitored;</li> <li>• Section 3(k) Other matters required in terms of section 24(4)(a) and (b) of the Act.</li> </ul> <p>, and as mentioned earlier design/layout alternatives to possibly accommodate an offset area will be contemplated and discussed in the DEIAR.</p> <p>3. We note that pages 5 and 46 of the Draft Scoping Report provide that an advertisement is set to be published in the Noorkaap Bulletin. We further note that Appendix 5 provides an example of the advertisement. The Draft Scoping Report as well as the annexures thereto fail to provide any proof of publication of the advertisement. We kindly request to be provided with proof of publication of said advertisement.</p> <p>Please refer to Appendix 5.2 for proof of the publication of the advertisements in the Noordkaap Bulletin.</p> <p>4. We note that page 31 of the Draft Scoping Report provides that 4 x 30 ton flatbed trucks will be required to transport prospecting and bulk sampling material. Given the size of the trucks, will the expansion of the existing roads be required and has this been considered as a potential listed activity under the EIA Regulations?</p> <p>As mentioned under Section 2(d)(ii) Description of the activities to be undertaken – Access Roads, the farm roads will be upgraded where necessary to allow the comfortable movement of the prospecting machinery/vehicles. Where needed jeep-tracks will be opened from the main farm road to the specific prospecting sites in agreement with the landowners. These tracks will be temporary and will be rehabilitated once prospecting ceases and if the landowner do not wish the track to remain. The jeep-track route will as far as possible avoid sensitive vegetated areas (to be identified by an ecologist), watercourses, and cultivated area and must be approved by the ECO prior to use. Presently the maximum width of a track is expected to be ±5 m. Further to this, the upgrade of the roads/tracks is provided for in Listing Notice 2 Activity 19 (as amended).</p>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>5. <i>We note that the Draft Scoping Report includes various references as well as figures captured from the DFFE Screening Report. The Draft Scoping Report as well as the annexures thereto made available during the public participation process fail to include the DFFE Screening Report. We kindly request to be provided with a copy of the DFFE Screening Report.</i></p> <p>As confirmed by CDH the findings of the DFFE Screening Report were available in the DSR, as it also forms part of the FSR. The DFFE Screening Report was also submitted to the DMRE in support of the Environmental Authorisation Application. The report does not form part of the DSR/FSR as it is not considered a public document. However, CDH would be able to obtain an independent report from the DFFE screening tool (public) website should the application footprint, specified in this report and the attached maps, be mapped.</p>			
<p>Additional response to the comments received from Mr Izak Gous on behalf of SIOC Kolomela Mine upon compilation of the DEIAR;</p> <p><u>Paragraph 1:</u></p> <p>The drilling operation requires ±1 000 l of water/day while the bulk sampling activities will necessitate ±10 000 l/day. Water will be used for dust suppression at the prospecting sites and access roads. Potable water will daily be transported to site by the employees, while the process water will be bought from registered local sources (to be identified) in the vicinity of the prospecting activities and transported to site in a water truck(s).</p> <p>Once the final target areas were identified the PR Holder will identify the available water sources within the proximity. As water will be obtained from registered sources the PR Holder will have to comply with the standards/requirements of the source's authorisation. Water tally sheets will be maintained to monitor water use quantity and baseline water quality results will be obtained prior to use.</p> <p>Also refer to the following sections where the possible impact on water sources are discussed and mitigation measures proposed:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(g)(iv)(c) Description of specific environmental features and infrastructure on the site - Site Specific Hydrology.</i></li> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk.</i></li> <li>• <i>Part A(1)(j) Summary of specialist reports.</i></li> </ul>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<ul style="list-style-type: none"> <li>• <i>Part A(1)(k)(i) Summary of the key findings of the environmental impact assessment.</i></li> <li>• <i>Part B(1)(d)(viii) Has a water use license been applied for?</i></li> </ul> <p><u>Paragraph 2:</u></p> <p>Refer to:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Air Quality and Noise Ambiance.</i></li> </ul> <p><u>Paragraph 3:</u></p> <p>Refer to:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(d)(ii) Description of the activities to be undertaken – Access Roads.</i></li> <li>• <i>Part A(1)(d)(ii) Description of the activities to be undertaken – Traffic Requirements.</i></li> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Access Road Mitigation.</i></li> </ul> <p><u>Paragraph 4:</u></p> <p>Refer to:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Management of safety and security risk posed by prospecting activities to residents</i></li> <li>• <i>Part A(1)(u)(i(1) Impact on the socio-economic conditions of any directly affected person.</i></li> </ul> <p><u>Paragraph 5:</u></p> <p>Refer to:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Fire Risk Management.</i></li> </ul>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p><u>Paragraph 6 &amp; 7:</u></p> <p>Refer to:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(d)(ii) Description of the activities to be undertaken – Waste Handling.</i></li> <li>• <i>Part A(1)(d)(ii) Description of the activities to be undertaken – Servicing and Maintenance.</i></li> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Waste Management.</i></li> </ul> <p><u>Paragraph 8:</u></p> <p>Refer to:</p> <ul style="list-style-type: none"> <li>• <i>Part A(1)(g)(i) Details of the development footprint alternatives considered.</i></li> <li>• <i>Part A(1)(g)(iv)(c) Description of specific environmental features and infrastructure on the site - Site Terrestrial Biodiversity, Conservation Areas, Groundcover and Fauna.</i></li> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Terrestrial Biodiversity, Conservation Areas, Groundcover and Fauna.</i></li> <li>• <i>Part A(1)(m) Final proposed alternatives.</i></li> <li>• <i>Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Waste Management.</i></li> </ul>			
<p>Additional response to the comments received from CDH on behalf of SIOC Kolomela Mine upon compilation of the DEIAR;</p> <p><u>Item 1 &amp; 2:</u></p> <p>As noted in <i>Part A (1)(g)(i) Details of the development footprint alternatives considered - c) Design and layout of the activity</i>, although Minrom identified a potential target area on Portion 5 of Bermolli No 583 (Figure 8), the Applicant decided that the farm (including both Portion 4 and 5) will be excluded from the invasive prospecting and/or bulk sampling programme, and therefore no invasive prospecting will take place on either of these properties.</p>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>The no-go option was accordingly updated to include both Portion 4 and 5 of Bermolli No 583 regarding invasive prospecting as mentioned in <i>Part A(1)(g)(i) Details of the development footprint alternatives considered - f) Option of not implementing the activity (No-go Alternative)</i>.</p> <p><u>Item 3:</u></p> <p>Please refer to Appendix I2 for proof of the publication process thus far conducted.</p> <p><u>Item 4:</u></p> <p>As mentioned in <i>Part A(1)(d)(ii) Description of the activities to be undertaken – Access Roads</i>, the farm roads will be upgraded where necessary to allow the comfortable movement of the prospecting machinery/vehicles. Where needed jeep-tracks will be opened from the main farm road to the specific prospecting sites in agreement with the landowners. These tracks will be temporary and will be rehabilitated once prospecting ceases and if the landowner do not wish the track to remain. The jeep-track route will as far as possible avoid sensitive vegetated areas, watercourses, and cultivated area and must be approved by the ECO prior to use. Presently the maximum width of a track is expected to be ±5 m. Further to this, the upgrade of the roads/tracks is provided for in GNR 983 of 2014 (as amended) Activity 20.</p>			
Van der Byl Boerdery (Pty) Ltd & Me Valerie Sieberhagen	<ul style="list-style-type: none"> <li>• Engelsdraai No 221</li> <li>• Portion 1 of Engelsdraai No 221</li> <li>• Remaining Extent of Farm No 218</li> <li>• Portion 2 of Farm No 218</li> </ul>	22 February 2024	Various telephonic discussions.
<p>Apart from telephonic discussions with this landowner, Greenmined did not yet receive any written correspondence regarding the project. However, as landowner, Me Sieberhagen is considered a registered I&amp;AP for both the Remaining Extent and Portion 1 of Engelsdraai No 221 that will be kept informed throughout the EIA process.</p>			

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
KG Mining (Pty) Ltd & Mr and Mrs Maritz	<ul style="list-style-type: none"> <li>• Witdraai 204</li> <li>• Portion 1 of Witdraai 204</li> <li>• Portion 1 of Farm No 203</li> <li>• Portion 2 of Farm No 203</li> </ul>	22 February 2024	No comments received
Abraham Willem Adriaan van Wyk Testamentêre Trust & Me TJ van Wyk & Me M and Mr PJ van Biljon	<ul style="list-style-type: none"> <li>• Vaalwater No 84</li> <li>• Portion 1 of Vaalwater No 84</li> <li>• Portion 2 of Vaalwater No 84</li> <li>• Farm No 570</li> </ul>	22 February 2024	No comments received
T&B van Wyk Familie Trust (Tok van Wyk)	Moidraai No 310	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
ERG Management (South Africa) (Pty) Ltd	Portion 1 of Kongoni No 311	22 February 2024	No comments received
Assmang Ltd (Blackrock Mine Operations)	Telele No 312	22 February 2024	01 March 2024

Me C Vries registered Blackrock Mine Operations as an IAP on this project.

Greenmined acknowledged receipt of the registration on 04 March 2024.



**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Ampie Coetsee	Roldraai No 333	22 February 2024	No comments received
Eben Anthonissen	Perth No 276	22 February 2024	No comments received
Saltrim Ranches (Pty) Ltd	Middelplaats No 332	22 February 2024	No comments received
Dawid Fourie	Annex Langdon No 278	22 February 2024	No comments received
Jacobus Petrus Jansen	York A No 279	23 February 2024	No comments received
TJ Jansen	York 279 Portion 12	23 February 2024	No comments received
DP World previously known as Imperial Logistics South Africa Group (Pty) Ltd	Portion 13 of York A No 279	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	25 March 2024 & 26 March 2024

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>Mr W Pretorius asked confirmation whether his property (Portion 13 of York No 279) borders the proposed PR application area.</p> <p>Upon confirmation that the said property borders the proposed application area, Mr Pretorius requested a full version of the DSR, and confirmed that DP World acquired Imperial Logistics South Africa Group (Pty) Ltd.</p>			
<p>Greenmined responded on 26 March 2024 that the property does border the application area, and that Mr Pretorius was registered as I&amp;AP on the project and will be kept informed throughout the EIA process.</p> <p>Greenmined, supplied Mr Pretorius with a copy of the DSR as well as the link to the website where the full report and appendices can be accessed. Any additional comments received from Mr Pretorius will be incorporated into the DEIAR that will follow should the FSR be approved.</p>			
Eksteen Kotze	Farm No 231	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 28 February 2024	No comments received
Kriel Boerdery Trust	<ul style="list-style-type: none"> <li>• RE of Farm No 228</li> <li>• Portion 1 of Farm No 228</li> </ul>	Telephonic discussions with Mr Kriel as he does not have an email.	Mr Kriel confirmed that he has no comments or objections.
Mr HT Snijman & Hennie Tjaart Snijman Testamentêre Trust	<ul style="list-style-type: none"> <li>• Remaining Extent of Watervlak No 585,</li> <li>• Portion 2 of Watervlak No 60</li> <li>• Remaining Extent of Gras Vlake No 61,</li> <li>• Remaining Extent of Farm No 223</li> </ul>	22 February 2024	No comments received

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Floradale Boerdery CC	Farm No 230	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Pieter Bredenkamp Trust	Farm No 222	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Coeta-M Trust	Farm No 224	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
QCK Lezmin 4677 (Pty) Ltd	Portion 3 of Farm No 210	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Johannes Hendrik Coetzee	<ul style="list-style-type: none"> <li>• Paauwvontein No 209</li> <li>• Portion 1 of Gekonsolideerde Plaas No 210</li> </ul>	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Maarten Coetzee Lambrechts	<ul style="list-style-type: none"> <li>• Farm No 200</li> <li>• Portion 1 of Farm No 200</li> <li>• Farm No 201</li> <li>• Portion 1 of Farm No 201</li> <li>• Portion 1 of Farm No 202</li> </ul>	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
	<ul style="list-style-type: none"> <li>• Farm No 203</li> <li>• Oudemeideskloof No 205</li> </ul>		
Adam Johannes Christiaan Van Wyk	Cone No 82	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Abrie Nel & Me DGS Murray	Zaai Plaats No 83	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Paul van Zyl	Kopje No 85	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Frederick Petrus Van der Schyff	<ul style="list-style-type: none"> <li>• RE of Dell No 92</li> <li>• RE of Range No 93</li> </ul>	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Jacobus Wessel Van Niekerk	<ul style="list-style-type: none"> <li>• Matsap No 81</li> <li>• Farm No 79</li> </ul>	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Oberholster Anna Gertruida B/E & Oberholster Anna Gertruida Trust	<ul style="list-style-type: none"> <li>• Bergenaars Pad No 225</li> <li>• Farm No 220</li> </ul>	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received

**INITIAL PUBLIC PARTICIPATION PERIOD AND DRAFT SCOPING REPORT COMMENTING**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Roelof Jacobus Coetzee	Paardekloof No 219	Invited to register on the project through the Noordkaap Bulletin advertisement (22 February 2024) & emailed 05 March 2024	No comments received
Mr A Williams	Postmasburg Boervereniging (Agri Postmasburg)	22 February 2024	Mr A Williams was registered as I&AP on the project as he represents Agri Postmasburg.

**NOTIFICATION OF DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME TO STAKEHOLDERS, LANDOWNERS AND I&APS DURING PUBLIC PARTICIPATION**

*COMMENTING PERIOD: 03 OCTOBER – 04 NOVEMBER 2024*

Following the approval of the final Scoping Report, the DEIAR & EMPR was compiled that were distributed for public comment over a 30-day period that ended on 04 November 2024. The comments received on the draft EIA & EMPR were incorporated into the final EIA & EMPR to be submitted to the DMRE for decision making. Also refer to Appendix I2 for the proof of public participation conducted during the project. The following table provides a list of the I&AP's and stakeholders that were invited to comment on the DEIAR & EMPR:

<b>DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD</b>			
<b>STAKEHOLDERS</b>			
<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Klaas Teise	John Taolo Gaetsewe District Municipality	03 October 2024	No Comments received
Mrs Boipelo D Motlhaping	Joe Morolong Local Municipality	03 October 2024	No Comments received
Cllr Tumelo I Gaobuse	Joe Morolong Local Municipality – Ward 4	03 October 2024	No Comments received
Mr Alfred Tieties	ZF Mgcau District Municipality	03 October 2024	No Comments received

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD****STAKEHOLDERS**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Gaonyadiwe H Mathobela	Tsantsabane Local Municipality	03 October 2024	No Comments received
Cllr. Lindiwe Misah Teise	Tsantsabane Local Municipality – Ward 7	03 October 2024	No Comments received
Mr Isak Visser	Pixley ka Seme District Municipality	03 October 2024	No Comments received
Mr Xolile Geco	Siyancuma Local Municipality	03 October 2024	No Comments received
Mr. Johannes George	Siyancuma Local Municipality Ward 1	03 October 2024	No Comments received
Mr Harry Teko Kolberg	Siyancuma Local Municipality Ward 7		
Mr W D Mothibi	Department of Agriculture, Land Reform and Rural Development	03 October 2024	No Comments received
Mr B Fisher	Department of Agriculture, Environment Affairs, Rural Development and Land Reform	03 October 2024	No Comments received

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<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mrs H Samson	Department of Economic Development and Tourism	03 October 2024	No Comments received
Mr Kholekile Nogwili	Department of Roads and Public Works	03 October 2024	No Comments received
Me Lerato Mokhoantle	Department of Water and Sanitation	03 October 2024	30 October 2024
Me Lerato Mokhoantle acknowledged receipt of the DEIAR notification and commented as follows: "Of importance is to take note of Section 21 water uses in NWA, Act 36 of 1998 and if there is no water use authorisation in place please apply for it on the e-wulaas system, this should be for all water uses identified and relevant for this activity."			
Greenmined acknowledged receipt of Me Mokhoantle's email and noted that the comments will be shared with the Applicant for his consideration and action once the non-invasive prospecting activities indicated the areas to be sampled (invasive prospecting).			
Mr Albanie	Department of Labour	03 October 2024	No Comments received
Khahliso Makale	Eskom	03 October 2024	No Comments received



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TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
SAHRA	South African Heritage Resource Agency	03 October 2024	11 November 2024

Comments received from SAHRA on the project (11 November 2024):

“.....**Final Comment**

The following comments are made as a requirement in terms of section 38(8) of the NHRA in the format provided in section 38(4) of the NHRA and must be included in the Final BAR and EMPr:

- ◆ 38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development;
- ◆ 38(4)b – The recommendations of the heritage specialists are supported and must be adhered to. In addition, a 50m buffer must be applied to the identified heritage sites;
- ◆ 38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU ([bmotsodisa@sahra.org.za](mailto:bmotsodisa@sahra.org.za)) must be alerted as per section 35(3) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- ◆ 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU ([bmotsodsa@sahra.org.za](mailto:bmotsodsa@sahra.org.za)) must be alerted immediately as per section 36(6) of the NHRA. Non-compliance with section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;
- ◆ 38(4)d – See section 51(1) of the NHRA regarding offences;
- ◆ 38(4)e – The following conditions apply with regards to the appointment of specialists:
  - ◆ i) If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;

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The Final BAR and EMPr must be submitted to the SAHRIS application for record purposes.”			

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United Manganese of Kalahari (Pty) Ltd	<ul style="list-style-type: none"> <li>• Botha No 313</li> <li>• Portion 1 of Botha No 313</li> <li>• Smartt No 314</li> </ul>	03 October 2024	No Comments received
Kudumane Manganese Resources (Pty) Ltd & Malan Scholes Incorporated	<ul style="list-style-type: none"> <li>• Devon No 277</li> <li>• Portion 2 of York A No 279,</li> <li>• Portion 11 of York A No 279,</li> <li>• Portion 1 of Telele No 312</li> </ul>	03 October 2024	25 October 2024 28 October 2024 04 November 2024

*Kudumane Manganese Resources (Pty) Ltd (KMR) was initially a landowner of one of the properties (Remaining Extent of Devon No 277) that formed part of the proposed prospecting footprint. The farm Devon No 277 has subsequently been removed from the application footprint and KMR is therefore no longer a landowner applicable to*

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<p><i>this application. KMR has since become a <u>surrounding landowner</u> of this application following the decision by the Minister (DMRE) to remove Devon No 277 from the application footprint.</i></p>			

On 25 October 2024, the Minister of Mineral Resources and Energy responded as follows to the application in terms of section 96(2) of the MPRDA submitted on behalf of the Applicant against the decision of the Director-General in respect of KMR’s appeal to wholly suspend the decision of the Regional Manager to accept the Applicant’s (appellant) prospecting right application:

“After careful consideration of the facts presented before me, I Mr. S.G. Mantashe, Minister of Mineral Resources and Energy, hereby grant an application in terms of section 96(2) of the MPRDA to suspend the decision of the Director-General to wholly suspend the decision of the Regional Manager to accept the appellant’s application for a prospecting right in respect of the properties referred to above instead of suspending the decision only on the affected area for the following reasons:

- ◆ It is evident from paragraph 3.2.1 of Kudumane Manganese Resources Proprietary Limited’s appeal that it is the holder of the mining right in respect of manganese ore over a portion of farm Hotazel No 280 and farm Devon No 277.
- ◆ The appellant’s application was accepted of mineral Diatomite, Kieselguhr and Diatomaceous Earth over the remaining extent and portion 1 of the farm Botha 312, the remaining extent and portion 1 of farm Devon 277, portions 4 and 5 of the farm Bermolli 583, the remaining extent and portion 1 of the farm Engelsdraai 221, the remaining extent and portion 1 of the farm Witdraai 204 and the remaining extent and portions 1 and 2 of the farm Vaalwater 84.
- ◆ It is clear from the above facts that overlap is only over the farm Devon 277 (not with mineral). Therefore, the Director-General should have only suspended the overlapping area.
- ◆ Based on the facts presented and for the avoidance of prejudice the decision of the Director-Director [*General*] to wholly suspend the appellant’s application must be amended to only suspend the decision over the overlapping property.

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<p>◆ The balance of convenience favours the appellant as the decision to suspend its accepted application should have only been over the overlapping property.</p> <p>Therefore, the decision of the Director-General dated 6<sup>th</sup> September 2024 to wholly suspend the Regional Manager’s decision to accept the appellant’s application for a prospecting right is amended to only apply to an overlapping property (farm Devon No 277).”</p>			
<p>Saunders Osborne van der Watt Attorneys (representing the Applicant), shared the decision of the Minister with KMR and Malan Scholes Incorporated (representing KMR) on 28 October 2024.</p>			
<p>On 04 November 2024, Malan Scholes Incorporated submitted the following comments (on behalf of KMR) on the DEIAR &amp; EMPR:</p> <p><b>“1. Introduction</b></p> <p>1.1 We act for Kudumane Manganese Resources Proprietary Limited (“KMR”).</p> <p>1.2 We refer to your notice dated 3 October 2024 (“3 October Notice”), which enclosed a link contain, inter alia, the draft environmental impact assessment report &amp; environmental management programme report (“Draft EIAR”) prepared by Greenmined Environmental Proprietary Limited (“Greenmined”), the environmental assessment practitioner (“EAP”) appointed by K2022641005 (South Africa) Proprietary Limited (the “Applicant”), for purposes of the Applicant’s application for an environmental authorisation (“EA Application”) in terms of Part 3 of Chapter 4 of the Environmental Impact Assessment Regulations, 2014 (GNR 982 of 4 December 2014), as amended (“EIA Regulations”), published in terms of the provisions of the National Environmental Management Act, 107 of 1998, as amended (“NEMA”). A copy of the 3 October Notice is attached hereto as Annexure “A”.</p> <p>1.3 The EA Application has been submitted by the Applicant in pursuance of a Prospecting Right (“Prospecting Right Application”) with Department of Mineral Resources and Energy (“DMRE”) reference number NC 30/5/1/1/2/13826 PR in accordance with Section 16 of the Mineral and Petroleum Resources Development Act, 28 of 2002 as amended (“MPRDA Act“), inclusive of bulk sampling, for the minerals diatomite, diatomaceous earth and kieselguhr in respect of the following properties –</p>			

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<p>1.3.1 in the Kuruman District –</p> <p>1.3.1.1 Portion 1 and the Remaining Extent of the farm Botha No 313; and</p> <p>1.3.1.2 Portion 1 and the Remaining Extent of farm Devon No 277 (the “Farm Devon”);</p> <p>1.3.2 in the Hay District –</p> <p>1.3.2.1 Portions 4 and 5 of the farm Bermolli No 583;</p> <p>1.3.2.2 Portions 1 and the Remaining Extent of farm Engelsdraai No 221;</p> <p>1.3.2.3 Portion 1 and the Remaining Extent of the farm Witdraai No 204, and</p> <p>1.3.2.4 Portions 1, 2 and the Remaining Extent of the farm Vaalwater No 84;</p> <p>all situated within the Northern Cape Province (“Prospecting Right Area”).</p> <p>1.4 The purpose of this letter is to provide comments, in terms of Regulation 43 of the EIA Regulations, by KMR (being a registered interested and affected party (“I&amp;AP”)), in the form of an objection and to bring specific issues to the attention of, inter alia, Greenmined, the Applicant and the DMRE. The comments and objections submitted by KMR are set out in paragraph 2 below.</p> <p>1.5 In light of the fact that KMR became aware of the availability of the Draft EIAR for comment on 3 October 2024, KMR’s comments are submitted on 4 November 2024, being within the prescribed 30-day period.</p> <p><b>2 Comments and Objections in respect of the Draft EIAR</b></p> <p>1.1 Relevant background and KMR’s existing rights</p> <p>1.1.1 On 12 February 2024, KMR first became aware of the Prospecting Right Application submitted by the Applicant when Tshifhiwa Nemakhavhani (“Nemakhavhani”), a SHEQ Manager employed by KMR, came across the Prospecting Right Application notification advertised alongside the main entrance gate of the Farm Devon. The Prospecting Right Application Notification advised I&amp;As of the Applicant’s Prospecting Right Application for the minerals</p>			

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			<p>diatomite, diatomaceous earth and kieselguhr, in respect of the Prospecting Right Area. A photography of the Prospecting Right Application Notification taken by Nemakhavhani on 12 February 2024 is attached hereto as Annexure “B”.</p>
1.1.2			<p>On 22 February 2024 and subsequent to becoming aware of the Prospecting Right Application, KMR received a copy of the draft scoping report (“Draft Scoping Report”) in respect of the Prospecting Right Application. On 25 March 2024, KMR submitted comments in respect of the Draft Scoping Report (“March 2024 Comments”). A copy of the March 2024 Comments without the annexures thereto, is attached as Annexure “C”.</p>
1.1.3			<p>At the time KMR submitted the March 2024 Comments, the Draft Scoping Report and the Prospecting Right Application related to the entire Prospecting Right Application Area, as listed in paragraph 1.3 above, which included Portion 1 and the Remaining Extent of Farm Devon.</p>
1.1.4			<p>As indicated in paragraph 1.9 of the March 2024 Comments, KMR is the Holder as defined in Section 1 of the MPRD Act, of a Mining Right (“KMR Mining Right”) for “Manganese Ore” in respect of, inter alia, the Farm Devon, situated in the Magisterial District of Kuruman, Northern Cape (“KMR Mining Right Area”). The KMR Mining Right commenced on 20 January 2017 and will continue to be in force for a period of 20 years, ending on 19 January 2037. A copy of the KMR Mining Right is attached hereto as Annexure “D”.</p>
1.1.5			<p>KMR subsequently applied for and was granted consent in terms of Section 102 of the MPRD Act (“Section 102 Amendment”) to include the minerals “[B]anded Iron Formation, Calcree and Wesselite” in the KMR Mining Right. A copy of the Section 102 Amendment is attached hereto as Annexure E.</p>
1.1.6			<p>As indicated in the March 2024 Comments, in addition to being the Holder of the KMR Mining Right, KMR owns the following properties –</p> <ul style="list-style-type: none"> <li>1.1.6.1 Portion 1 and the Remaining Extent of the Farm Devon (which portions fall within Prospecting Right Application Area);</li> <li>1.1.6.2 Portions 2 and 11 of the Farm York A 279; and</li> <li>1.1.6.3 Portion 1 of the farm Telele 312.</li> </ul>
1.1.7			<p>On 1 July 2024 (“1 July Email”), Greenmined via email advised KMR that –</p>

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			<p><i>“following a remote surveying exercise it was decided that <u>the Remaining Extent of the farm Devon No 277 will be excluded from any prospecting and/or bulk sampling</u> as this farm did not show any economically viability or quality of the mineral under application (kieselguhr/diatomite) [our emphasis].”</i></p>
			<p>1.1.8 Greenmined further advised KMR that –  <i>“[S]hould the prospecting right be successful the Applicant will also request the DMRE to <u>remove the farm prior to the granting and execution of the said right</u> [our emphasis].”</i></p>
			<p>1.1.9 On page 2 of the Draft EIAR, Greenmined states that <i>“<u>the farm Devon No 277 will not be prospected as it will be omitted from the application footprint</u>”</i>.</p>
			<p>1.1.10 Furthermore, it should be noted that on page 2 of the Draft EIAR, Greenmined states that –  <i>“An amended EA Application Form will be submitted with the FEIAR &amp; EMPR to the DMRE to incorporated (sic) Farm No 570 (Zaai Plaats) in the application footprint (16 162.1945 ha with Farm No 570 (Zaai Plaats)).”</i></p>
			<p>1.1.11 It therefore appears that in addition to <u>excluding</u> the Farm Devon from the Prospecting Right Application Area, the Applicant intends to submit an amended environmental authorisation application to <u>incorporate</u> the Farm Zaai Plaats.</p>
			<p>1.1.12 It is not up to Greenmined to decide when and how it intends to amend the EA Application submitted by the Applicant, and KMR therefore submits that should the Applicant wish to formally exclude the Farm Devon and incorporate the Farm Zaai Plaats into the Prospecting Right Application, both the Prospecting Right Application and EA Application must be withdrawn and a new Prospecting Right application and environmental authorisation application be submitted by the Applicant, which reflect the correct properties applied for by the Applicant.</p>
			<p>1.1.13 The Prospecting Right application acceptance letter does not include reference to the Farm Zaai Plaats and therefore the Applicant is not permitted to include reference to this Farm in its EA Application.</p>
			<p>1.1.14 Until such time as KMR has sight of a revised acceptance letter from the Regional Manager, KMR must assume that the Prospecting Right Application and EA Application still include the Farm Devon. All the comments and objections raised by KMR in the March 2024 Comments therefore remain relevant.</p>

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1.2 Suspension Decision in respect of the Prospecting Right Application			
<p>1.2.1 On 26 March 2024, and in addition to the submission of the March 2024 Comments, KMR lodged an appeal in terms of Section 96 of the MPRD Act (“Section 96 Appeal”), against the administrative decision of the Regional Manager: Northern Cape Region of the DMRE, to accept the Prospecting Right Application submitted by the Applicant (“Acceptance Decision”). The Section 96 Appeal by KMR was submitted on, inter alia, the basis that the Prospecting Right Application Area directly overlaps with a portion of the KMR Mining Right Area, namely the Farm Devon. A copy of the Section 96 Appeal, without the annexures thereto, is attached as Annexure “F”.</p> <p>1.2.2 In paragraph 8 of the Section 96 Appeal and in accordance with Section 96(2)(a) of the MPRD Act, KMR requested the Director-General of the DMRE (“DG”) to suspend the Acceptance Decision pending the final adjudication of the Section 96 Appeal (“Suspension Request”). KMR submitted the Suspension Request to prevent the DMRE from inadvertently granting a Prospecting Right to the Applicant, without consideration of the contents of, inter alia, the Section 96 Appeal.</p> <p>1.2.3 On 6 September 2024, the DG granted KMR’s Suspension Request due to, inter alia, the potential prejudice to be suffered by KMR demonstrated in the Section 96 Appeal (“Suspension Request Grant Decision”). A copy of the Suspension Request Grant Decision is attached hereto as Annexure “G”.</p> <p>1.2.4 As a result of the Suspension Request Grant Decision, the Acceptance Decision in respect of the Prospecting Right Application submitted by the Applicant, is suspended pending the outcome of the Section 96 Appeal.</p> <p>1.2.5 KMR therefore submits that in light of the Suspension Request Grant Decision, the Prospecting Right Application cannot be processed any further until the finalisation of the Section 96 Appeal by KMR.</p>			
1.3 KMR’s existing operations			
<p>1.3.1 In accordance with the KMR Mining Right, KMR –</p> <p>1.3.1.1 is currently conducting opencast Mining Operations on the farm Hotazel 280;</p>			



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	<p>1.3.1.2 is engaged in an exploration campaign which seeks to optimise opencast resources and thereby increase the overall life of mine on the farm Kipling 271;</p> <p>1.3.1.3 intends to establish a Waste Dump on the Western side of the farm Devon (“Waste Dump”). The Waste Dump is an authorised facility;</p> <p>1.3.1.4 intends to conduct concurrent rehabilitation activities at the Devon pit located on the farm Devon;</p> <p>1.3.1.5 intends to expand mining operations to the orebody on the farm Devon (including underground mining); and</p> <p>1.3.1.6 intends to develop a blasting contractor site on the Eastern side of the farm Devon.</p> <p>1.3.2 In addition to being the Holder of the KMR Mining Right in respect of the KMR Mining Area, KMR is the Holder of a Mining Right for “Manganese Ore” (“York Mining Right”) in respect of the “<i>Remainder of Portion 1 of the farm Telele No 312, Remainder and Portion 2 of the farm York</i>” situated in the Magisterial District of Kuruman, Northern Cape Province (“York Mining Right Area”). A copy of the York Mining Right is attached hereto as Annexure “H”.</p> <p>1.3.3 It is evident from the plan attached to the KMR Mining Right, that the KMR Mining Area and the York Mining Area are situated directly opposite one another. In accordance with both the KMR Mining Right and the York Mining Right, KMR intends to –</p> <p>1.3.3.1 Commence with underground Mining Operations which is intended to stretch from the farm Devon to the farm York; and</p> <p>1.3.3.2 Migrate the waste collected at the farm York to the farm Devon, once the Waste Dump has been established by KMR.</p> <p>1.3.4 Importantly, the underground mining activities on the farm Devon are authorised in KMR’s existing approvals.</p> <p>1.3.5 As indicated in paragraph 2.1.14 above, the Farm Devon has not been formally excluded from the Prospecting Right Application Area, therefore the March 2024 Comments by KMR remains relevant for the purposes of these Comments.</p>		
<p>1.4 Socio-economic Impacts and Benefits</p>	<p>1.4.1 In motivating for the need and desirability of the proposed Prospecting Operations by the Applicant, Greenmined on page 43 of the Draft EIAR states that the “<i>proposed labour component of the proposed project will be ±15 to 20 labourers that will be hired from the local communities</i>”. Greenmined goes further on page 48 of the Draft EIAR to state that “[T]his is of crucial importance in municipal areas with high unemployment rates”.</p>		

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1.4.2	Appendix 3 to the EIA Regulations outlines the objective of the environmental impact assessment process contemplated in Regulation 23 of the EIA Regulations. Appendix 3 provides that an EIAR must include “ <i>the need and desirability of the activity in the context of the development footprint on the approved site as contemplated in the accepted scoping report</i> ”.		
1.4.3	As indicated in paragraph 2.2.6 of the March 2024 Comments, the Applicant failed to motivate the need and desirability of the proposed Prospecting Operations in the Draft Scoping Report and has similarly failed to provide such motivation in the Draft EIAR, in that the Draft EIAR provides no detail regarding how the Applicant intends creating employment opportunities and how the employment of the “±15 to 20 labourers” will in fact benefit the local community.		
1.4.4	In respect of the “[O]ption of not implemented the activity (No-go Alternative)”, on page 65 of the Draft EIAR, Greenmined states that –  <i>“The no-go option will further entail a loss of employment opportunities, as well as socio-economic benefits and growth development opportunities for the employees. Given the high level of unemployment and poverty in the earmarked magisterial districts the loss of such opportunities is considered significant [our emphasis].”</i>		
1.4.5	Without disclosing the anticipated economic, social and growth development opportunities of the project, it is impossible to ascertain whether or not proceeding the with the proposed Prospecting Operations is preferred over alternative uses of the properties. The Applicant has therefore simply failed to motivate the need and desirability of the proposed Prospecting Operations, as required in Appendix 3.		
1.4.6	Considering that the proposed Prospecting Operations and possible future Mining Operations are invasive in nature and will result in environmental impacts, the Draft EIAR must specify, in detail, that the actual anticipated socio-economic benefits, despite the potential environmental impacts, outweigh other possible land uses. This is particularly so considering KMR’s existing rights in respect of the Farm Devon in relation to the Prospecting Right Application Area. This is addressed in further detail below.		
1.5	Impact of the Applicant’s Prospecting Operations on KMR		
1.5.1	As indicated in paragraph 2.3.1 2,1.8above, in accordance with the KMR Mining Right, KMR –		

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			<p>1.5.1.1 intends to establish the Waste Dump on the Western side of the farm Devon;</p> <p>1.5.1.2 intends to conduct concurrent rehabilitation activities at the Devon pit located on the farm Devon;</p> <p>1.5.1.3 intends to expand mining operations to the orebody on the farm Devon; and</p> <p>1.5.1.4 intends proceeding with underground mining on the farm Devon; and</p> <p>1.5.1.5 intends to develop infrastructure in respect of the proposed underground mining activities on the Eastern side of the farm Devon.</p> <p>1.5.2 On page 55 of the Draft EIAR, Greenmined states that –  <i>“prospecting will be conducted using a combination of <u>non-invasive and invasive activities</u>. <u>The invasive prospecting will include drilling and trenching that will entail the collection of large samples (±50 000 m<sup>3</sup> per phase) that constitutes bulk sampling</u> [our emphasis].”</i></p> <p>1.5.3 Greenmined goes further on page 3 of the Draft EIAR to state that –  <i>“Geophysical equipment will be needed for ground electro-magnetic, magnetic and gravity surveys. <u>The bulk sampling trenches/pits will be dug by excavator, upon which the loosened material will be moved by FEL to the crushing/milling plant. The material will be crushed, screened, and sized to product stockpiles from where it will be transported off-site by trucks</u> [our emphasis].”</i></p> <p>1.5.4 It is therefore clear that the proposed Prospecting Operations by the Applicant are invasive in nature and will directly impact on KMR’s existing and future operations on the Farm Devon and those operations surrounding the Prospecting Right Application Area.</p> <p>1.5.5 On page 48 of the Draft EIAR, Greenmined states that –  <i>“[D]ue to the nature of invasive prospecting activities, the location of drill holes and sampling sites can to a certain extend be moved to avoid structures and/or sensitive areas where possible.”</i></p> <p>1.5.6 Yet Greenmined fails to provide I&amp;As with any drill site coordinates in respect of the Prospecting Right Application Area. According to Greenmined on page 209 of the Draft EIAR, <i>“[A]t this stage of the project, it is impossible to define the exact locations of drill sites and bulk sampling trenches/pits or number of drill holes to be dug.”</i></p>

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1.5.7	Considering that the Applicant's EA Application Area currently still relates to, inter alia, Portion 1 and the Remaining Extent of the Farm Devon, it is inevitable that the proposed drillholes will be located within the KMR Mining Area.		
1.5.8	KMR, as an I&AP, is entitled to all the information relating to the proposed Prospecting Operations by the Applicant, which includes KMR being provide with the exact co-ordinates at which the Applicant intends on conducting Prospecting Operations.		
1.5.9	It is submitted that the DMRE cannot make an informed decision on the Applicant's EA Application or the Prospecting Right Application if the proposed drill site coordinates are not provided to both the DMRE and I&AP's. The drill site coordinates cannot be determined subsequent to the granting of the EA Application to the Applicant.		
1.5.10	It is self-evident that drilling activities cannot be permitted above the areas where KMR will be conducting (authorised) underground mining and/or in close proximity to the Waste Dump and KMR's surface infrastructure. The health, safety and environmental impacts of any simultaneous operations must be considered by the Applicant in its EA Application.		
1.5.11	The failure by Greenmined and the Applicant to provide KMR with the necessary information relating to the intended Prospecting Operations by the Applicant, means that KMR cannot assess the potential impacts of the proposed Prospecting Operations and bulk sampling on KMR, both as Holder of the KMR Mining Right and the owner of Portion 1 and the Remaining Extent of the Farm Devon.		
1.5.12	It is submitted by KMR that it would be impossible for KMR to conduct its intended and authorised future operations on the Farm Devon and the Farm York in circumstances where the Applicant is conducting drilling and bulk sampling.		
1.6	Inadequate specialist studies		
1.6.1	Regulation 23 of the EIA regulations provides that –		

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<p><i>“(1) The applicant must within 106 days of the acceptance of the scoping report, or, where regulation 21(2) applies, within 106 days of the date of receipt of the application by the competent authority, submit to the competent authority-</i></p>			
<p><i>(a) an environmental impact assessment report <u>inclusive of any specialist reports</u>, an EMP, a closure plan in the case of a closure activity and where the application is a mining application, the plans, report and calculations contemplated in the Financial Provisioning Regulations, <u>which must have been subjected to a public participation process of at least 30 days</u> and which reflects the incorporation of comments received, including any comments of the competent authority [our emphasis]”.</i></p>			
1.6.2	Regulation 16(b) of the EIA Regulations provides that an EA application must, inter alia, be accompanied by “ <i>the report generated by the national web based <u>environmental screening tool</u> [our emphasis]” (“Screening Tool”).</i>	In addition to failing to provide our Clients with the Screening Tool, Greenmined and the Applicant have further failed to conduct sufficient specialist studies in support of the EA Application.	
1.6.3	On page 24 of the Draft EIAR, Greenmined provides a summary of the following specialist studies undertaken for purposes of the EA Application –		
1.6.3.1	a Heritage Impact Assessment;		
1.6.3.2	a Palaeontological Impact Assessment; and		
1.6.3.3	a Wetland/Aquatic and Terrestrial Desktop Sensitivity Assessment.		
1.6.4	On page 228 of the Draft EIAR, Greenmined lists various mitigation measures to address/minimise the potential impacts associated with the Applicant’s proposed Prospecting Operation, which includes the following –		
1.6.4.1	“ <i>The liberation of dust into the surrounding environment must be effectively controlled using, inter alia, straw, water spraying and/or environmentally friendly dust-allying agents that contains no PCB’s (e.g. DAS products)</i> ”;		
1.6.4.2	“ <i>Topsoil stockpiles must be protected against losses by water- and wind erosion. Stockpiles must be positioned so as not to be vulnerable to erosion by wind and water. The establishment of plants (grass or indigenous cover crop) on the stockpiles will help to prevent erosion</i> ”;		
1.6.4.3	“ <i>No activities may take place, without the necessary authorisation from the DWS, within a horizontal distance of 100 m from any watercourse or estuary or within a 500 m radius from a delineated boundary of any wetland or pan</i> ”.		

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<p>1.6.5</p> <p>1.6.6</p> <p>1.6.6.1</p> <p>1.6.6.2</p> <p>1.6.6.3</p> <p>1.6.6.4</p> <p>1.6.6.5</p> <p>1.6.6.6</p> <p>1.6.6.7</p> <p>1.6.6.8</p> <p>1.6.6.9</p> <p>1.7</p> <p>1.7.1</p>	<p>However, it is unclear on which basis Greenmined can confidently include these mitigation measures in the Draft EIAR, where specialist studies which should inform these measures have not been undertaken. i.e. the listing of dust control measures without conducting an Air Quality Impact Assessment.</p> <p>In the absence of the Screening Tool, it is unclear as to which specialist studies are required to be undertaken by the Applicant, however, considering the invasive nature of the proposed Prospecting Operations, KMR submits that at the very least the following specialist studies should have been undertaken by Greenmined –</p> <p>a visual impact assessment;</p> <p>a noise impact assessment;</p> <p>a traffic impact assessment;</p> <p>a social impact assessment;</p> <p>an air quality impact assessment;</p> <p>a blasting and vibration assessment;</p> <p>a hydrological assessment;</p> <p>a climate change impact assessment; and</p> <p>a biodiversity impact assessment.</p>		<p><i>“The application proposes that sampling will remain &gt;100 m from all active water sources. This will be groundtruthed and confirmed by a hydrologist prior to commencement. However, once the invasive prospecting plan was finalised and should an application in terms of Section 39 of the NWA, 1998 for water uses as defined in section 21 of the Act be needed, the Applicant will enter discussions with the DWS to determine the relevant requirements [our emphasis]”.</i></p>

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1.7.2	As previously indicated in the March 2024 Comments, in paragraph 2(b) of the Acceptance Letter (attached hereto as Annexure "I"), the Regional Manager directs the Applicant to "[L]odge an application in terms of the National Water Act No 36 of 1998 with the Department of Water Affairs with immediate effect". Despite being directed to apply for a WUL in terms of the NWA "with immediate effect", it is clear that no WUL application has been submitted by the Applicant.		
1.7.3	On page 37 of the Draft EIAR, Greenmined states that – <i>"[T]he drilling operation does not require water while the bulk sampling activities will necessitate ±10 000 l/day. Water will be used for dust suppression at the prospecting sites and access roads. <u>Potable water will daily be transported to site by the employees, while the process water will be bought from registered local sources (to be identified) in the vicinity of the prospecting activities and transported to site in a water truck(s) [our emphasis]."</u></i>		
1.7.4	The Draft EIAR fails to specify –  1.7.4.1 which local "source" the Applicant intends to make use of; and 1.7.4.2 if the local source is able to meet the water quality and quantity required by the Applicant.		
1.7.5	Furthermore, on page 41 of the Draft EIAR, in providing the context in which the NWA is applicable to the EA Application, Greenmined state that – <i>".....the proposed activities are not currently expected to need authorisation in terms of the NWA as sampling sites will remain &gt;100 m from active watercourses."</i>		
1.7.6	It therefore appears, that Greenmined is of the opinion that because the "sampling sites will remain >100 m from active watercourses that a WUL is not required. Notwithstanding the fact that the "sampling sites will remain >100 m from active watercourses", section 21 of the NWA prescribes the various water use activities for which a WUL is required, which includes, inter alia, "taking water from a water resource."		

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<p>1.7.7 In this regard, on page 231 of the Draft EIAR, Greenmined states that “[W]ater abstraction may only occur at a registered water source in accordance with the requirements of the authorisation”. It is submitted by KMR that if the “water source” referred to by Greenmined includes a “watercourse, surface water, estuary, or aquifer”, then a Section 21 water use is triggered and a WUL must be applied for by the Applicant.</p> <p><b>3 Conclusion</b></p> <p>1.1 It is evident from the comments in paragraph 2 that the Applicant’s EA Application and the Draft EIAR are flawed due to a failure to comply with the EIA Regulations and to disclose critical information to I&amp;APs. It is submitted by KMR that the EA Application must be refused by the DMRE.</p> <p>1.2 As provided in Regulation 44 of the EIA Regulations, these comments must be recorded in the reports and plans to be submitted to the competent authority pursuant to the EA Application.</p> <p>All of KMR’s rights are reserved.”</p>			
<p>Greenmined responded as follows to the DEIAR comments received from Malan Scholes Incorporated (on behalf of KMR) on 12 November 2024:</p> <p>“1. Your correspondence dated 4 November 2024 refers, the content of which is noted to be similar to the comments contained in your correspondence dated 25 March 2024.</p> <p>2. The above-mentioned comments will be addressed herein, as far as they relate to new issues, which have not already been addressed in the approved Scoping Report and draft Environmental Impact Assessment Report (DEIAR). For purposes hereof kindly refer to Table 13: Summary of issues raised by I&amp;APs, pages 86 to 89 of the DEIAR.</p> <p>3. Considering the aforementioned, the Applicant responds as follows to your client’s latest comments and objections.</p> ”			



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<p>4. Paragraphs 1 to 2.1.11</p> <p>4.1. The content of the abovementioned paragraphs is noted.</p> <p>5. Paragraph 2.1.12 and 2.1.13</p> <p>5.1. Greenmined is the appointed Environmental Assessment Practitioner for this project and acts on behalf of the Applicant in terms of this Environmental Authorisation (EA) application.</p> <p>5.2. The DMRE SAMRAD online portal does not make provision for the addition or removal of properties to an existing application. However, the EA Application form itself is a manual document that can be amended and submitted for consideration to the DMRE, as the competent authority.</p> <p>5.3. As you rightfully said, the decision to amend an EA is not up to Greenmined, but indeed that of the competent authority.</p> <p>6. Paragraph 2.1.14</p> <p>6.1. As you are aware your client submitted a Section 96 appeal to suspend the decision made by the Regional Manager to accept the prospecting right as a whole, which application was successful.</p> <p>6.2. Subsequently, the Applicant submitted an appeal to the decision made by the Director General to suspend the whole acceptance of the Regional Manager, which application was also successful. The Minister overturned the decision made by the Director General, which was replaced by the decision to amend the acceptance to exclude the overlapping area, being the farm Devon 277. Attached hereto the Minister's decision dated 25 October 2024, which is marked Annexure "A". Said outcome was sent on 28 October 2024 by Saunders Osborne Van der Watt Attorneys, by email, to you and your client.</p> <p>6.3. Considering the Minister's decision that the farm Devon 277 is excluded from the application, your client will suffer no prejudice by the continuation of this application.</p> <p>7. Paragraphs 2.2 and 2.3</p>			

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<p>7.1. Paragraphs 2.2 and 2.3 of your correspondence are no longer relevant, as it motivates prejudice to be suffered by your client, should the application proceed on the basis that the farm Devon 277 is included. The Minister already removed farm Devon 277 from the application's acceptance, therefore your client's grounds for the objections raised herein is unfounded.</p> <p>8. Paragraph 2.4</p> <p>8.1. Kindly refer to pages 279 to 282 of the DEIAR, which contains the motivation for the Impact on the Socio-Economic Conditions of directly affected persons.</p> <p>8.2. Although your client avers that the Applicant failed to motivate the need and desirability of the proposed prospecting operation, the competent authority deemed the motivation sufficient for purposes of this application, by approving the Scoping Report.</p> <p>8.3. In terms of the land uses kindly refer to page 280 of the DEIAR which stipulates that: <i>"This project entails the prospecting of specific target areas on the earmarked farms. Considering this, the project does not oppose the current land uses of the properties, but rather supplement it by diversifying the land use that directly impacts the revenue yield as the landowners will be compensated for the use of the land."</i></p> <p>8.4. Prospecting activities will be conducted simultaneous and concurrent to other existing land uses, not instead thereof, as alleged by your client.</p> <p>9. Paragraph 2.5</p> <p>9.1. The comments contained in paragraph 2.5 as far as it relates to your client's existing rights in terms of its mining right are no longer relevant as the farm Devon has been excluded from the application. There will be no impacts on your client's existing and/or future operations.</p> <p>9.2. In terms of the drill sites and drilling activities referred to in your paragraphs 2.5.5 to 2.5.12, we refer you to the Remote Sensing Study conducted by Minrom and attached to the DEIAR as Appendix H. Said study is also discussed on pages 181 to 191 of the DEIAR. Although the exact coordinates have not been identified at this stage, the information at the competent authority's disposal will provide them with a very good understanding of where the prospecting activities will be located.</p> <p>9.3. We reiterate that the farm Devon 277 has been excluded from this application, therefore, your client's allegation that it will be impossible to conduct its intended future operations on the farms Devon and York is misconstrued and unfounded.</p>			

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10. Paragraph 2.6

10.1. In terms of your client's allegation that inadequate specialist studies were conducted, and that information was withheld from your client, kindly note that the information contained in the Screening Tool already forms part of the DEIAR, which both you and your client has access to and was already able to comment on.

10.2. Your client alleges that a hydrological assessment and a biodiversity impact assessment was not undertaken, although same was already undertaken during the scoping phase, as part of the freshwater and terrestrial assessments.

10.3. No blasting will be conducted during prospecting activities; therefore, a blasting and vibration assessment will be superfluous.

10.4. Furthermore, the specialist studies conducted for purposes of this application was deemed sufficient by the competent authority, by its approval of the Scoping Report.

11. Paragraph 2.7

11.1. The Applicant provided all relevant project related information, including the DEIAR, to the Department of Water and Sanitation (DWS) for their comment and further guidance. In the event that a listed activity in terms of Section 21 of the National Water Act, 36 of 1998, is triggered, at any stage of the project, application will be made to the DWS for the relevant activity.

11.2. In addition to the above please refer to page 105 of the DEIAR, which is excerpted below for your ease of reference:

*"Once the final target areas were identified the PR Holder will identify the available water sources within the proximity. As water will be obtained from registered sources the PR Holder will have to comply with the standards/requirements of the source's authorisation. Water tally sheets will be maintained to monitor water use quantity and baseline water quality results will be obtained prior to use."*

It is important to note that reference to "available water sources within the proximity" refers to already registered and authorised sources of water.

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<p>11.3. As your client will not be party to the agreement between the Applicant and the authorised water supplier, the Applicant fails to comprehend your client's persistence to direct the Applicant which local source to utilise.</p> <p>12. Paragraph 3:</p> <p>12.1. Your client's submission that the DEIAR is flawed and that the EA Application must be refused, is with all due respect unfounded and based on the assumption that the Farm Devon 277 still forms part of the application. You are once again referred to the Minister's decision dated 25 October 2024 to remove the Farm Devon 277 from the acceptance of the application.</p> <p>12.2. All comments received, with responses thereto, will form part of the final EIAR to be submitted to the competent authority, for consideration.</p> <p>12.3. The Applicant's rights remain reserved."</p>			
Transnet Ltd	<ul style="list-style-type: none"> <li>• Portion 1 of Devon No 277</li> <li>• Portion 1 of Perth No 276</li> <li>• Portion 3 of York A No 279</li> </ul>	03 October 2024	No Comments received
<p><i>Transnet was initially a landowner of one of the properties (Portion 1 of the farm Devon No 277) that formed part of the proposed prospecting footprint. The farm Devon No 277 (including Portion 1) has subsequently been <u>removed</u> from the application footprint and Transnet is therefore <u>no longer a landowner</u> applicable to this application. Transnet has since become a <u>surrounding landowner</u> of this application following the decision by the Minister (DMRE) to remove Devon No 277 from the application footprint.</i></p>			
Mr PJ van der Byl Lambrechts & Me C Lambrechts	Portion 4 of Bermolli No 583	03 October 2024	No Comments received

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Sishen Iron Ore Company (Pty) Ltd & CDH	<ul style="list-style-type: none"> <li>• Portion 5 of Bermolli No 583</li> <li>• RE of Farm No 542,</li> <li>• Portion 2 of Farm No 542</li> <li>• Portion 3 of Farm No 542</li> </ul>	03 October 2024	03 October 2024

Mr Gous submitted the following DEIAR comments on 03 October 2024:

“Please provide information on the following aspects:

**1. Air quality management**

- a. What measures will be implemented to ensure dust are adequately monitored and effectively controlled.
- b. If water will be abstracted to manage dust or for any other reason, what will the source be and how will it be monitored.

**2. Access road**

- a. The additional traffic might detrimentally impact the condition of the R383 and subsequently impact road safety for other users.

**3. Security and access control**

- a. How will access to the site be managed.
- b. What measures will be put in place to ensure the safety and security of neighboring landowners will not be compromised.

**4. Sensitive areas**

- a. What measures will be implemented to avoid all possible impacts to sensitive areas (fauna/flora/regulated zones).

**5. Veld fire management**

- a. What measures will be put in place to prevent fires, and if a fire does occur, will a competent team be available to respond to the fire.

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**6. On-site rehabilitation**

a. What is the rehabilitation timeframe for each disturbed area. This includes roads, drill pads, park-up areas etc. What methodology will be used.

**7. Borehole management procedure**

a. How will boreholes be rehabilitated? Provide an illustration. What will the timeline be to sign-off fully rehabilitated boreholes.

**8. Waste management**

a. Will adequate waste management practices be implemented and monitored.

**9. Sanitary services**

a. How will sanitation be managed throughout the project.

In addition to the above, please provide us with any other applicable information to the project. Please also confirm that SIOC has now been registered as an I&AP in accordance with the information set out in the table above.”

Greenmined acknowledged (on 10 October 2024) that SIOC (Pty) Ltd is a registered I&AP on this project. It was also confirmed that the initial comments (and registration as I&AP) received on 26 February 2024 were incorporated into the final Scoping Report (FSR) as well as the draft Environmental Impact Assessment Report (DEIAR). Greenmined further responded to Mr Gous’ comments as listed below:

**“1. Air Quality**

Dust generation will be controlled through the following mitigation measures as proposed in the DEIAR and incorporated into the EMPR:

- ◆ The liberation of dust into the surrounding environment must be effectively controlled using, inter alia, straw, water spraying and/or environmentally friendly dust-allaying agents that contains no PCB’s (e.g. DAS products).
- ◆ The site manager must ensure continuous assessment of the dust suppression equipment to confirm its effectiveness in addressing dust suppression.

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<ul style="list-style-type: none"><li>◆ The crusher plant must be equipped with water sprayers to alleviate dust and fines buildup must at least weekly be removed from and around the conveyors.</li><li>◆ Speed on the access road must be limited to 40 km/h to prevent the generation of excess dust.</li><li>◆ Areas devoid of vegetation, which could act as a dust source, must be minimized and vegetation removal may only be done immediately prior to prospecting.</li><li>◆ Weather conditions must be taken into consideration upon commencement of daily operations. Limiting operations during very windy periods would reduce airborne dust and resulting impacts.</li><li>◆ All dust generating activities shall comply with the National Dust Control Regulations, GN No R827 promulgated in terms of NEM:AQA (Act 39 of 2004) and ASTM D1739 (SANS 1137:2012).</li><li>◆ Best practice measures shall be implemented during the stripping of topsoil to minimize potential dust impacts.</li></ul> <p>Water will be used for dust suppression at the prospecting sites and access roads. Potable water will daily be transported to site by the employees, while the process water will be bought from registered local sources (to be identified) in the vicinity of the prospecting activities and transported to site in a water truck(s). Once the final target areas were identified the PR Holder will identify the available water sources within the proximity. As water will be obtained from registered sources the PR Holder will have to comply with the standards/requirements of the source's authorisation. Water tally sheets will be maintained to monitor water use quantity and baseline water quality results will be obtained prior to use.</p> <p>Applicable sections in the DEIAR:</p> <ul style="list-style-type: none"><li>◆ Part A(1)(d)(ii) Description of the activities to be undertaken – Water Use.</li><li>◆ Part A(1)(g)(iv)(c) Description of specific environmental features and infrastructure on the site - Site Specific Air Quality and Noise Ambiance.</li><li>◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Air Quality and Noise Ambiance.</li><li>◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Hydrology.</li></ul>			

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**2. Access Road**

The prospecting operations will daily be visited by approximately ten (10) vehicles. The bulk sampling activities will require approximately four 30-ton flatbed trucks to transport the material from the farm to the port, Johannesburg, or various other production facilities. The access roads will be managed through the following mitigation measures as proposed in the DEIAR and incorporated into the EMPR:

- ◆ Stormwater must be diverted around the access road to prevent erosion.
- ◆ Vehicular movement must be restricted to the existing access roads (where possible) and crisscrossing of tracks through undisturbed areas must be prohibited.
- ◆ Rutting and erosion of the access road caused as a direct result of the prospecting activities must be repaired by the Applicant.
- ◆ Overloading of the trucks must be prevented, and proof of load weights must be filed for auditing purposes.
- ◆ Prior to commencement, all contractors must sign an agreement confirming their responsibility towards the movement of their employees.
- ◆ Damages to fences (by prospecting employees) must be repaired/reinstated by the responsible contractor. Losses, due to gates left open by prospecting employees, must be compensated by the responsible entity.
- ◆ A speed limit of not more than 40 km/h on internal roads and 60 km/h on public roads must be implemented for the duration of the project.

Applicable sections in the DEIAR:

- ◆ Part A(1)(d)(ii) Description of the activities to be undertaken – Access Roads.
- ◆ Part A(1)(d)(ii) Description of the activities to be undertaken – Traffic Requirements.
- ◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Access Road Mitigation.
- ◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Management of safety and security risk posed by prospecting activities to residents.



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<p><b>3. Security and Access Control</b></p> <p>The prospecting campaign will be headed by a drill contractor. Site management will always be responsible for the movement of their employees. No prospecting personnel will be allowed to wander outside the approved footprint. The contractor will sign an agreement to this effect upon appointment and will be held responsible for damages to fences or gates left ajar by prospecting personnel. The following mitigation measures were proposed in the DEIAR and incorporated into the EMPR to address the potential of safety and security risks posed by the prospecting activities:</p> <ul style="list-style-type: none"> <li>◆ Employees to be appointed must be vetted prior to inception of contract.</li> <li>◆ No employees may be allowed to reside within the prospecting area.</li> <li>◆ Prospecting employees must be educated to report suspicious looking person/s and/or matters to site management.</li> <li>◆ Direct communication between the prospector and the landowners must be maintained for the duration of the site establishment-, operational, and decommissioning phases.</li> <li>◆ The prospecting contractor may not enter negotiations with farm employees.</li> <li>◆ Prospecting may only take place during normal business hours and unless otherwise authorised by the landowner.</li> <li>◆ No alcohol or prohibited drugs may be allowed on site.</li> <li>◆ Attendance registers must be maintained, and all prospecting vehicles/machinery must be pre-registered with the landowner/security.</li> <li>◆ No firearms will be allowed on site.</li> </ul> <p>Applicable sections in the DEIAR:</p> <ul style="list-style-type: none"> <li>◆ Part A(1)(u)(i)(1) Impact on the socio-economic conditions of any directly affected person.</li> <li>◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Management of safety and security risk posed by prospecting activities to residents.</li> </ul>			

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<p><b>4. Sensitive Areas</b></p> <p>The invasive prospecting plan (showing drilling, and pit sampling locations) will be determined based on the outcome of phases 1, 2, 4, and 6 (Table 4 in the DEIAR). Thus far the remote sensing data and initial freshwater- and terrestrial sensitivity results (refer to Part A(1)(g)(iv)(1)(c) Description of the specific environmental features and infrastructure on the site – Site Specific Geology, Site Specific Hydrology and Site Specific Terrestrial Biodiversity, Conservation Areas, Groundcover and Fauna of the DEIAR) are the main factors steering the design/layout proposal regarding invasive prospecting. Following receipt of the specialist findings and recommendations, the Applicant proposes the following regarding Bermolli No 583/5:</p> <ul style="list-style-type: none"> <li>◆ Should the PR application be successful and phases 1 and 2 identify Portion 5 of Bermolli No 583 for sampling, the hydrologist and ecologist will revisit the target area and identify the least sensitive part of the proposed ±430 ha area where invasive prospecting will have the lowest impact. Sampling will remain &gt;100 m from all confirmed active watercourses.</li> <li>◆ The site camp will be established on a previously disturbed/altered area.</li> <li>◆ Bulk sampling will be restricted to a maximum disturbance of 1 ha on Bermolli No 583/5 sited at the area/s identified by the specialists.</li> <li>◆ The Applicant will enter discussions with the landowner prior to prospecting and should Bermolli No 583/5 be a declared Nature Reserve prior to the granting of the prospecting right the Applicant will omit the farm from the prospecting programme.</li> <li>◆ A chance find protocol will be implemented to safeguard against impacts of archaeological and/or palaeontological concern.</li> <li>◆ The area will be backfilled once sampling concluded and rehabilitated to a state to be determined and approved by the hydrologist.</li> </ul> <p>Applicable sections in the DEIAR:</p> <ul style="list-style-type: none"> <li>◆ Part A(1)(g)(iv)(1)(c) Description of specific environmental features and infrastructure on the site – Site Specific Hydrology.</li> <li>◆ Part A(1)(g)(iv)(1)(c) Description of specific environmental features and infrastructure on the site – Site Specific Terrestrial, Biodiversity, Conservation Areas, Groundcover and Fauna.</li> <li>◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Hydrology.</li> <li>◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Terrestrial, Biodiversity, Conservation Areas, Groundcover and Fauna.</li> </ul>			

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

**TITLE, NAME AND SURNAME**

**AFFILIATION/KEY STAKEHOLDER STATUS**

**CONTACTED DATE**

**RESPONSE RECEIVED**

**5. Veld fire management**

The risk of fires will be managed through the implementation of the following mitigation measures as proposed in the DEIAR and incorporated into the EMPR:

- ◆ No open fires are permitted on any of the sampling sites. Contained fires for heating and cooking (i.e. in a fire drum) but be restricted to designated areas at the site camp,
- ◆ Employees must be prevented from setting fires randomly outside designated areas.
- ◆ No fuel or chemicals may be stored under trees.
- ◆ Gas may not be stored in the same storage area as liquid fuel.
- ◆ Smoking may only occur at designated areas (>3 m from fuel or chemical storage areas) equipped with sand buckets for the disposal of cigarette buds.
- ◆ Ensure Work Site and the contractor's camp is equipped with adequate firefighting equipment. This includes at least rubber beaters when working in veld areas, and at least one fire extinguisher of the appropriate type irrespective of the site.
- ◆ Specific fire safety precautions must be implemented during welding activities associated with construction work. Ensure a working fire extinguisher is immediately at hand if any "HOT WORK" is undertaken e.g. welding, grinding, gas cutting etc,
- ◆ Any fires noted on site must be reported to the responsible SHE rep and/or fire officer.
- ◆ The site must implement fire emergency procedures for the duration of the site establishment-, operational-, and decommissioning phases.
- ◆ In the event of large fires all personnel must assemble at a safe assembly point to be transported from site. The fire department or local fire watch must be informed of the fire to ensure that the fire is brought under control as soon as possible.

Applicable sections in the DEIAR:

- ◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Fire Management.
- ◆ Part B(1)(m)(ii) Manner in which risks will be dealt with in order to avoid pollution or the degradation of the environment.

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p><b>6. On-site rehabilitation</b></p> <p>Rehabilitation will include activities that can be divided into medium- and long term categories. In the medium term, rehabilitation will entail the continuous reinstatement of prospected areas, and the management of invasive plant species and/or erosion. In the long term, rehabilitation will involve the reinstatement of the remaining disturbed areas (not yet reinstated), prior to the submission of a closure application to the Department of Mineral Resources and Energy (DMRE). The PR holder will further be responsible for the seeding of all rehabilitated areas should vegetation not establish through succession within the first six months. The jeep tracks (internal roads) will be temporary and will be rehabilitated once prospecting ceases and if the landowner do not wish the track to remain. The following rehabilitation actions are proposed:</p> <ul style="list-style-type: none"> <li>◆ Rehabilitation of all the disturbed surface areas shall entail landscaping, levelling, sloping, top dressing, land preparation, seeding (if required), and invasive plant clearing.</li> <li>◆ All unwanted infrastructures, equipment, and other items used during the prospecting period will be removed from the site in accordance with section 44 of the MPRDA, 2002.</li> <li>◆ Waste material of any description, including receptacles, scrap, rubble, and tyres, will be removed entirely from the prospecting area, and disposed of at a recognized landfill facility. It will not be permitted to be buried or burned on the site.</li> <li>◆ The rehabilitation area will be cleared of invader plant species. Priority will be given to species regarded as Category 1a and 1b invasive species in terms of NEM:BA (National Environmental Management: Biodiversity Act 10 of 2004 and regulations applicable thereto).</li> </ul> <p>The decommissioning activities will consist of the following:</p> <ul style="list-style-type: none"> <li>◆ Removal of all prospecting equipment from the sampling sites;</li> <li>◆ Sealing and capping of the boreholes;</li> <li>◆ Backfilling of all trenches and pits;</li> <li>◆ Removal of all prospecting related infrastructure/containers from the site camp; and</li> <li>◆ Landscaping of any/all compacted areas.</li> </ul> <p>The Applicant will also comply with the minimum closure objectives as prescribed DMRE and detailed in the EMPR in Part B(1)(d)(i) Determination of Closure Objectives.</p>			

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**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

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Each target area will be rehabilitated within 60 days of conclusion of the prospecting activities, upon which it can be signed back to the landowner if he/she so wishes.

Once the entire prospecting area was rehabilitated the Applicant is required to submit a closure application to the Department of Mineral Resources and Energy in accordance with section 43(4) of the MPRDA, 2002 that states: “*An application for a closure certificate must be made to the Regional Manager in whose region the land in question is situated within 180 days of the occurrence of the lapsing, abandonment, cancellation, cessation, relinquishment or completion contemplated in subsection (3) and must be accompanied by the prescribed environmental risk report*”.

Applicable sections in the DEIAR:

- ◆ Part A(1)(d)(ii) Description of the activities to be undertaken – 3. Decommissioning Phase.
- ◆ Part A(1)(u)(i)(1) Impact on the socio-economic conditions of any directly affected person.
- ◆ Part B(1)(d)(i) Determination of closure objectives.

**7. Borehole management procedure**

As mentioned earlier, each target area will be rehabilitated within 60 days of conclusion of the prospecting activities, upon which it can be signed back to the landowner if he/she so wishes. The following procedure is proposed regarding the rehabilitation of the boreholes and trenches and will be added to the FEIAR and EMPR in addition to the decommission information that already form part of the DEIAR & EMPR.

**BOREHOLE REHABILITATION PROCEDURE**

**Borehole Inspection**

- ◆ Visual Inspection: Check the borehole for signs of contamination, instability, or other issues.
- ◆ Log Data: Document the condition and depth of the borehole.

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

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**Decommissioning the Borehole**

- ◆ Seal the Borehole: Depending on regulations, use a suitable sealing method. This may include:
  - Cement Grouting: Filling the borehole with cement or a similar material.
  - Clay Sealing: Using clay to prevent water migration.
  - Remove Equipment: Safely remove any casing, tubing, or other equipment from the borehole area.

**Site Restoration**

- ◆ Backfill and Grading: Fill the area around the borehole and grade it to blend with the surrounding landscape.
- ◆ Revegetation: If necessary, plant indigenous vegetation to restore the ecosystem.

**Monitoring**

- ◆ Post-Rehabilitation Monitoring: Conduct follow-up assessments to ensure that the rehabilitation measures are effective.

**Documentation**

- ◆ Record Keeping: Maintain detailed records of the rehabilitation process, including methods used, materials, and any follow-up monitoring results.

**Reporting**

- ◆ Submit Reports: Provide necessary documentation and reports to relevant authorities as required by regulations.

**EXPLORATION TRENCHING REHABILITATION PROCEDURE**

**Safety Measures**

- ◆ Hazard Identification: Identify any potential hazards (e.g., unstable ground, equipment).

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- ◆ Personal Protective Equipment (PPE): Ensure that all personnel wear appropriate PPE.
- ◆ Secure: Trenching Area will be demarcated and secured by protective barricades to ensure no unauthorized personnel or animals can enter the excavation area.

**Trench Inspection**

- ◆ Visual Assessment: Inspect trenches for erosion, contamination, or instability.
- ◆ Document Conditions: Record findings, including depth, width, and any observed issues.

**Filling the Trenches**

- ◆ Backfill Material: Use suitable backfill material, such as topsoil and native soil, to refill the trenches.
- ◆ Compaction: Compact the backfill to minimize settling and prevent future erosion.

**Surface Restoration**

- ◆ Grading: Grade the area to ensure proper drainage and to blend with the surrounding landscape.
- ◆ Erosion Control: Implement erosion control measures (e.g., silt fences, sediment traps) if needed.

**Revegetation**

- ◆ Seed Selection: Use indigenous vegetation or appropriate seed mixes to promote natural regeneration.
- ◆ Planting: Consider planting seedlings or vegetation in areas where erosion risk is higher.

**Monitoring and Maintenance**

- ◆ Post-Rehabilitation Monitoring: Regularly check the site for signs of erosion or vegetation failure.
- ◆ Maintenance: Conduct necessary maintenance, such as reseeding or reinforcing erosion controls.

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**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

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**AFFILIATION/KEY STAKEHOLDER STATUS**

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**Documentation and Reporting**

- ◆ Record Keeping: Document all rehabilitation activities, including methods, materials used, and monitoring results.
- ◆ Final Report: Prepare a report summarizing the rehabilitation process for submission to regulatory bodies if required.

Please refer to the following images as representation of rehabilitated capped boreholes of similar prospecting activities.



**8. Waste management**

**9. Sanitary services**

The following waste management practices are proposed in the DEIAR and were incorporated into the EMPR:



**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD**

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<p>Due to the nature of the project, the small scale of each prospecting site, and the fact that maintenance work will be done off-site, very little general waste will be generated as a direct result of the prospecting activities. All the general waste generated at the prospecting sites will be transported to the site camp where it will be contained in refuse bins. Once full the refuse bins will be emptied, and the waste will be disposed of at a registered landfill site in the vicinity of the project. Proof of safe disposal will be filed for auditing purposes.</p> <p>Hazardous waste will mainly be the result of accidental spillages or breakdowns. Such contaminated areas will be cleaned up immediately (within two hours of the occurrence) and the contaminated soil will be contained in designated hazardous waste containers to be removed daily to the hazardous waste storage area at the site camp. A registered contractor will be appointed to collect and dispose of the hazardous waste at a registered hazardous waste handling facility and the site will file the proof of safe disposal for auditing purposes.</p> <p>The chemical toilets will weekly be serviced by an appropriately qualified sewerage handling contractor who will furnish the site with proof of safe disposal.</p> <p>Also refer to Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Waste Management of the DEIAR.</p> <p>Applicable sections in the DEIAR:</p> <ul style="list-style-type: none"> <li>◆ Part A(1)(d)(ii) Description of the activities to be undertaken – Waste Handling.</li> <li>◆ Part A(1)(g)(viii) The possible mitigation measures that could be applied and the level of risk – Waste Management.</li> </ul>			
Van der Byl Boerdery (Pty) Ltd & Me Valerie Sieberhagen	<ul style="list-style-type: none"> <li>• Engelsdraai No 221</li> <li>• Portion 1 of Engelsdraai No 221</li> <li>• Remaining Extent of Farm No 218</li> <li>• Portion 2 of Farm No 218</li> </ul>	03 October 2024	No Comments received

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD****LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
KG Mining (Pty) Ltd & Mr and Mrs Maritz	<ul style="list-style-type: none"><li>• Witdraai 204</li><li>• Portion 1 of Witdraai 204</li><li>• Portion 1 of Farm No 203</li><li>• Portion 2 of Farm No 203</li></ul>	03 October 2024	No comments received
Abraham Willem Adriaan van Wyk Testamentêre Trust & Me TJ van Wyk & Me M and Mr PJ van Biljon	<ul style="list-style-type: none"><li>• Vaalwater No 84</li><li>• Portion 1 of Vaalwater No 84</li><li>• Portion 2 of Vaalwater No 84</li><li>• Farm No 570</li></ul>	03 October 2024	No comments received
J&B van Wyk Familie Trust (Tok van Wyk)	Moidraai No 310	03 October 2024	No comments received
ERG Management (South Africa) (Pty) Ltd	Portion 1 of Kongoni No 311	03 October 2024	No comments received
Assmang Ltd (Blackrock Mine Operations)	Telele No 312	03 October 2024	No Comments received
Mr GA Coetsee	Roldraai No 333	03 October 2024	No comments received

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD****LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Eben Anthonissen Agri Northern Cape	Perth No 276	03 October 2024	17 October 2024
Mr Eben Anthonissen requested a copy of the DEIAR and asked whether the affected landowners were contacted yet.			
Greenmined supplied Mr Anthonissen with a link to the DEIAR on 17/10/2024 and confirmed that the affected landowners have all been contacted.			
Saltrim Ranches (Pty) Ltd	Middelplaats No 332	03 October 2024	No comments received
Mr DH Fourie	Annex Langdon No 278	03 October 2024	No comments received
Mr JP Jansen	York A No 279	03 October 2024	No comments received
Mr TJ Jansen	York 279 Portion 12	03 October 2024	No comments received

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD****LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
DP World previously known as Imperial Logistics South Africa Group (Pty) Ltd	Portion 13 of York A No 279	03 October 2024	No comments received
Mr CH Kotze	Farm No 231	03 October 2024	No comments received
Kriel Boerdery Trust	<ul style="list-style-type: none"><li>• RE of Farm No 228</li><li>• Portion 1 of Farm No 228</li></ul>	03 October 2024	No comments received
Mr HT Snijman & Hennie Tjaart Snijman Testamentêre Trust	<ul style="list-style-type: none"><li>• Remaining Extent of Watervlak No 585,</li><li>• Portion 2 of Watervlak No 60</li><li>• Remaining Extent of Gras Vlake No 61,</li><li>• Remaining Extent of Farm No 223</li></ul>	03 October 2024	No comments received
Floradale Boerdery CC	Farm No 230	03 October 2024	No comments received
Pieter Bredenkamp Trust	Farm No 222	03 October 2024	No comments received
Coeta-M Trust	Farm No 224	03 October 2024	No comments received

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<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
QCK Lezmin 4677 (Pty) Ltd	Portion 3 of Farm No 210	03 October 2024	No comments received
Mr JH Coetzee	<ul style="list-style-type: none"><li>• Paauwvontein No 209</li><li>• Portion 1 of Gekonsolideerde Plaas No 210</li></ul>	03 October 2024	No comments received
Mr MC Lambrechts	<ul style="list-style-type: none"><li>• Farm No 200</li><li>• Portion 1 of Farm No 200</li><li>• Farm No 201</li><li>• Portion 1 of Farm No 201</li><li>• Portion 1 of Farm No 202</li><li>• Farm No 203</li><li>• Oudemeideskloof No 205</li></ul>	03 October 2024	No comments received
Mr AJC Van Wyk	Cone No 82	03 October 2024	No comments received
Abrie Nel & Me DGS Murray	Zaai Plaats No 83	03 October 2024	No comments received
Mr PK van Zyl	Kopje No 85	03 October 2024	No comments received

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD****LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr FP Van der Schyff	<ul style="list-style-type: none"><li>• RE of Dell No 92</li><li>• RE of Range No 93</li></ul>	03 October 2024	No comments received
Mr JW Van Niekerk	<ul style="list-style-type: none"><li>• Matsap No 81</li><li>• Farm No 79</li></ul>	03 October 2024	No comments received
Oberholster Anna Gertruida B/E & Oberholster Anna Gertruida Trust	<ul style="list-style-type: none"><li>• Bergenaars Pad No 225</li><li>• Farm No 220</li></ul>	03 October 2024	No comments received
Mr RJ Coetzee	Paardekloof No 219	03 October 2024	No comments received
Mr A Williams	Postmasburg Boervereniging (Agri Postmasburg)	03 October 2024	No comments received
Mr S Tlhomelang	I&AP	03 October 2024	07 November 2024

Mr Tlhomelang requested a copy of the DEIAR and enquired in which area the application is situated.

**DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME COMMENTING PERIOD**

**LANDOWNERS AND INTERESTED & AFFECTED PARTIES**

**TITLE, NAME AND SURNAME**

**AFFILIATION/KEY STAKEHOLDER STATUS**

**CONTACTED DATE**

**RESPONSE RECEIVED**

Greenmined supplied Mr Tlhomelang with a copy of the DEIAR and project map on 07 November 2024.

Following a telephonic discussion with Mr Tlhomelang on 07 November 2024, that was also confirmed by an email received on the 8<sup>th</sup> of November 2024, Mr Tlhomelang indicated that he is particularly interested in input and/or advice that Greenmined can provide regarding training and development of especially new environmental graduates in the Joe Morolong Local Municipality.

Greenmined will continue discussions with Mr Tlhomelang even though the commenting period on this project ended. It must be noted that the comments submitted by Mr Tlhomelang relates to community matters in general and is not specific to this particular project, and that the DEIAR commenting period merely initiated the correspondence from Mr Tlhomelang.

## SUMMARY OF PUBLIC PARTICIPATION PROCESS

The I&AP's and stakeholders were informed of the proposed project, DSR and DEIAR through:

- telephonic discussions;
- direct notification with notification documents;
- placement of on-site notices;
- the placement of advertisements in the Noordkaap Bulletin.

Comments/objections/registrations were received from the following entities:

- Agri Northern Cape;
- Blackrock Mine Operations;
- DWS;
- Kudumane Manganese Resources (Pty) Ltd & Malan Scholes Incorporated (MSI);
- Mr A Williams (Agri Postmasburg);
- Me C Lambrechts (Portion 4 of Bermolli No 583);
- Mr J Bredenkamp (Portion 3 of Gekonsolideerde Plaas No 210);
- Mr W Pretorius (DP World formerly known as Imperial Logistics South Africa Group (Pty) Ltd / Portion 13 of York No 279);
- Mr S Tlhomelang;
- SAHRA;
- Sishen Iron Ore Company (SIOC) & Cliffe Dekker Hofmeyr (CDH);
- Transnet SOC Ltd; and
- United Manganese of Kalahari (Pty) Ltd.

Also refer to Appendix I for the proof of public participation conducted thus far.

**-END OF COMMENTS AND RESPONSE REPORT-**