

**INZALO CRUSHING AND AGGREGATES (PTY) LTD
PROPOSED AGGREGATE MINE ON A PORTION OF
PORTION 1 OF FARM RUIGTEVLEY 97 KQ,
THABAZIMBI LOCAL MUNICIPALITY, LIMPOPO
PROVINCE.**

COMMENTS AND RESPONSE REPORT

DEPARTMENTAL REFERENCE NUMBER:

MP LP 30/5/1/3/2/12396 MP



NOTIFICATION OF STAKEHOLDERS AND I&APS DURING THE PUBLIC PARTICIPATION PROCESS

COMMENTING PERIOD: 14 OCTOBER 2024 – 21 NOVEMBER 2024

During the public participation process the stakeholders and I&AP's were informed of the project by means of telephonic discussions, electronic correspondence, as well as an advert placed in the Platinum Bushvelder newspaper. Notices were also placed at the entrance to the site, as well as at the Buzz Café in Thabazimbi. A 40-days commenting period was allowed. The following table provides a list of the I&AP's and stakeholders that were informed of the project:

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr F Loots	Thabazimbi Local Municipality	14 October 2024	No Comments Received
Mr P Solomon	Thabazimbi Local Municipality Ward 1 Councillor	14 October 2024	No Comments Received
Mr P Raputsoa	Waterberg District Municipality	14 October 2024	No Comments Received
Mr M Rathumbu	Department of Economic Development, Environmental Affairs and Tourism	14 October 2024	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr P Tladi	Department of Labour	14 October 2024	No Comments Received
Ms Ramatsimele Maisela	Department of Agriculture & Rural Development	14 October 2024	No Comments Received
Mr S Matjena	Department of Transport	14 October 2024	No Comments Received
Mr M Malaka	Department Of Water and Sanitation	14 October 2024	No Comments Received
Dr N Mphephu	Lepelle Northern Water (LNW)	14 October 2024	No Comments Received
Mr M Phukuntsi	Department of Public Works, Roads & Infrastructure	14 October 2024	No Comments Received
Mr C Reddy	Eskom	14 October 2024	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Ms S Tshivhase	Road Agency Limpopo	14 October 2024	No Comments Received
L Lamprecht	L Lamprecht	14 October 2024	No Comments Received
Mr Machete	Mr Machete	14 October 2024	No Comments Received
Mr T Mashele	Mr T Mashele	14 October 2024	No Comments Received
SAHRIS Information officer	SAHRA	14 October 2024	19 November 2024

Comments received from SAHRIS Development Applications Unit:

SAHRA requests that an assessment of the impacts to heritage resources that complies with section 38(3) of the NHRA as required by section 38(8) of the NHRA and section 24(4)b(iii) of NEMA be conducted as part of the EA process. The assessment must include an assessment of the impact to archaeological resources. The field-based assessment of archaeological resources must be conducted by a qualified archaeologist and the report comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports (see www.asapa.co.za or www.aphp.org.za for a list of qualified archaeologists). The assessment must include the track logs of the area to be surveyed.

Any other heritage resources as defined in section 3 of the NHRA that may be impacted, such as built structures over 60 years old, sites of cultural significance

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes must also be assessed.</p> <p>The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations in order to address this comment. Further comments will be issued upon receipt of the above requested reports.</p> <p><u>Greenmined's Response:</u></p> <p>A Heritage Impact Assessment was done and uploaded on SAHRIS website.</p>			

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
Mr M Benade	Application Landowner as well as surrounding landowner Portion 1 of Farm Ruigtevley 97 KQ Surrounding Landowner Portion 3 of Farm Ruigtevley 97 KQ Portion 4 of Farm Ruigtevley 97 KQ	14 October 2024	No Comments Received
Mr A Aucamp Mr F de Toit	Surrounding Landowner Farm Vaalpenspan 90	14 October 2024	28 November 2024

Boshoff Smuts Inc representing surrounding landowner Mr A Aucamp also registered Reinland CC and Maxgem Mining CC as an interested and affected parties.

Comments received from Boshoff Smuts Inc, representing surrounding landowner Mr Aucamp:

RE: INZALO CRUSHING AND AGGREGATES (PTY) LTD.

PORTION 1 OF FARM RUIGTEVLEY 97 KQ THABAZIMBI, LIMPOPO.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION /PROPERTY DESCRIPTION

CONTACTED DATE

RESPONSE RECEIVED

PROPOSED AGGREGATE MINE (LP 30/5/1/3/2/12396 MP) AND STOCKPILE AREA.

COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME.

Dear Zoe and Anel

1. We refer to the abovementioned matter and confirm that we are acting on behalf of our clients Reinland CC and Maxgem Mining CC (“our clients”) under whose instruction this letter is provided and whose rights remain reserved.
2. Our clients are the owners of portions 0, 1, 2, 3 and 4 of the farm Vaalpenspan 90KQ. The proposed project site is situated on portion 1 of the farm Ruigtevley 97 KQ, which is directly across our client’s property, as such, our client will be directly impacted by this development.
3. Please take notice that these comments and objections are relevant to both the proposed aggregate mine as well as the proposed stockpile area, as such we would like for our comments to be included in the report for both projects.
4. Please take further notice that we did attempt to arrange a stakeholder meeting at the proposed project site, but we were unable to find a date that was suitable for all parties. We will continue to communicate until such a meeting can be arranged.
5. We have been instructed by our clients to convey the following concerns and comments in terms of the Draft Basic Assessment Report (“BAR”) and Environmental Management Program Report (“EMPR”) for the proposed projects.

SUMMARY OF MAIN CONCERNS

6. Our client’s property is currently being utilized as a hunting farm. The activities conducted on their farm include hunting for profit, breeding wildlife for resale, selling animal products, providing luxury accommodation and offering game drives. Our client’s income is thus primarily derived from the tourism and hospitality market, which is significantly influenced by their customer’s willingness to stay in an environment free from noise, pollution, dust and unsightly views. Therefore, maintaining a peaceful, clean and visually appealing setting is essential for our client’s successful business.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
--------------------------------	--	-----------------------	--------------------------

7. Operating a hunting farm has created many local job opportunities. Our client currently employs over 20 people at the hunting farm. These employees' salaries and careers are closely tied to the success of the tourism and hospitality market mentioned above.

8. Our client has also raised concerns over the well-being of his wildlife, as the noise and dust associated with mining, crushing and screening could disturb his animal's natural behaviour. The noise may impact the animal's stress levels causing them to flee to the furthers corners of the farm and potentially jumping the fence, their mating and breeding patterns could also potentially be affected. Additionally, the dust and potential water pollution could lead to the animals ingesting contaminated food and water. This would not only negatively impact the animal's general health, but it would also compromise the quality of the meat they produce, ultimately affecting the profitability and sustainability of the farm.

9. Our client questions the integrity of the road leading to his property. The increased traffic from heavy machinery will likely cause significant erosion over time, which would damage the road and create obstacles for customers. Additionally, the presence of unsightly machinery travelling along the road may detract from the overall experience for visitors. Unforeseen traffic delays could also disrupt customers' arrival times, further impacting their visit and our client's business.

10. This proposed mine will not only impact our client's current use, enjoyment and profitability, but it could also reduce the farm's value.

THE VISUAL IMPACT

11. We have taken note of your statement that the proposed mining activity will be partially obscured by a hill. However, as our client and ourselves have not yet had the opportunity to inspect the proposed mining site, we cannot confirm that the visual effect will be minimal. Our client's property is situated directly across the proposed site, as such we believe that further assessment is necessary.

12. The DBAR for the proposed mining project indicates that the visual intrusions resulting from site establishment, mining activities, excavation, form loading, and vehicle transport of material will be of medium significance. This raises concerns, as even moderate visual intrusions could detract from the natural beauty of the area, which is a key selling point for our client's business.

13. The DBAR for the stockpile area states that there will be a low to medium visual impact caused by the site establishment phase, stockpiling activities, and operation of the processing plant. While the EMPR advise on how these visual impacts will be mitigated.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
-------------------------	-----------------------------------	----------------	-------------------

14. Despite the claim that proper housekeeping and organisation will mitigate the visual impact, there would still be a visual impact visible when travelling to and around our client's property, possibly even from the camping site. As stated above our client's main source of income is related to the tourism and hospitality market which relies on the unobstructed natural beauty of the area.

15. The aesthetic changes resulting from this proposed project will directly affect our client's business. Visitors come to the farm not only for hunting but also to escape the visual and sensory overload of city life. Being confronted by a mining site after expecting to enjoy an undisturbed natural environment, would negatively impact the experience our client offers and, by extension, their business model.

NOISE LEVELS

16. The DBAR for the proposed mining project indicates that the noise nuisance caused by earthmoving machinery is of medium significance, while the noise nuisance resulting from blasting and mining activities is classified as low to medium significance. However, even noise at a lower level can still affect the surrounding environment and our client's business operations.

17. The DBAR for the stockpile area confirms that noise will be generated due to activities such as screening, crushing, and transporting materials. Noise from the crushing and screening processes during the stripping and stockpiling of topsoil and overburden is rated as a medium-level concern. Additionally, noise from the operation of the processing plant and crushing and screening machinery is categorized as low to medium-level concerns.

18. The noise generated from this proposed project will hinder not only our client's use and enjoyment of their property but also the customers who are trying to escape the noise from their busy city lives. The presence of ongoing noise pollution will undoubtedly detract from the peaceful, tranquil environment that our client's business relies on to attract guests.

19. Furthermore, there is concern that the noise and vibration caused by mining, blasting, and crushing activities could impact the natural behaviour of our client's wildlife. As noted earlier, the farm's animals are an essential part of our client's operations, and any disturbance to their behaviour could affect the overall experience for visitors and potentially harm the long-term viability of the farm's activities.

DUST

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
--------------------------------	--	-----------------------	--------------------------

20. Both DBARs confirm that dust will be generated as a result of activities such as blasting, displacement of soil, crushing and screening of hard rock, and the transport of material along gravel roads. Dust nuisance from site establishment, soil disturbance, and operation of the processing plant has been classified as a low to medium risk.

21. While dust suppression methods and housekeeping measures will be implemented to mitigate these issues, it is unclear how effective these methods will be in fully containing dust during periods of high wind.

22. Our clients are particularly concerned that airborne dust could be carried into their water supply and grazing grounds for wildlife, potentially leading to a decline in animal health. This could also negatively impact the quality of the meat produced, posing a threat to both environmental and economic sustainability.

23. Furthermore, maintaining cleanliness in an overnight accommodation business located nearby would be challenging if dust from the project site continues to blow onto the property. The accumulation of dust would compromise the quality of service and create significant operational difficulties in managing the cleanliness and hygiene of the accommodations.

THE ROAD

24. The DBAR for both the mining project and stockpile area indicates that the existing farm road will be used for site access. The EMPR outlines that the applicant will repair any damage caused to the access road as a direct result of the proposed activities and will implement measures to maintain the integrity of the road to the best of the applicant's ability.

25. However, the increased traffic associated with the proposed project will likely accelerate the erosion of the road, leading to more frequent maintenance requirements. This continuous need for road repairs will create obstacles and potential traffic disruptions, ultimately affecting the experience and accessibility for customers visiting the property.

CONCLUSION

26. In light of the concerns outlined above, it is clear that the proposed mining and stockpiling project will have detrimental effects on our client's business operations

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
-------------------------	-----------------------------------	----------------	-------------------

and the environment. The potential impacts on the aesthetic value of the property, noise pollution, dust nuisance, and the condition of the access road could significantly diminish the appeal of our client's hunting farm thus directly affecting our client's profitability and sustainability. Furthermore, the health and welfare of the farm's wildlife, which are integral to the client's business model, could be compromised by the adverse effects of mining activities.

27. Given the numerous risks posed by this proposed project, our client is compelled to formally object to the granting of the mining permit. The potential for long-term damage to the property's natural beauty cannot be overlooked.

28. Section 10(2) of the Mineral and Petroleum Resources Development Act 28 of 2002 ("MPRDA") states that: "If a person objects to the granting of a prospecting right, mining right, or mining permit, the Regional Manager must refer the objection to the Regional Mining Development and Environmental Committee to consider the objections and to advise the minister thereof."

29. The consequences of granting the mining permit are too significant to be disregarded, and we trust that this objection will be carefully evaluated during the decision-making process.

Greenmined's response on 06 December 2024:

RE: RESPONSE TO THE COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME FOR BOTH THE MINING PERMIT APPLICATION AND STOCKPILE APPLICATION ON A PORTION OF PORTION 1 OF FARM RUIGTEVLEY 97 KQ, THABAZIMBI LOCAL MUNICIPALITY, LIMPOPO PROVINCE: INZALO CRUSHING AND AGGREGATES (PTY) LTD.

Dear Sir

We refer to your letter dated 28 November 2024 sent in response to the draft Basic Assessment Report (DBAR) and Environmental Management Programme (EMPr) circulated for public comment in respect of the mining permit application as well as the stockpile application on a portion of Portion 1 of Farm Ruigtevley 97 KQ, Thabazimbi Local Municipality, Limpopo Province. We would like to thank you for participating in this process and for your valued comments.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
-------------------------	-----------------------------------	----------------	-------------------

We note your representation of Reinland CC and Maxgem Mining CC and acknowledge their right to provide comments and objections.

All concerns outlined have been noted and will be addressed with reference to the DBAR's findings and proposed mitigation measures in the FBAR.

We confirm that your response will be included to the final BAR and/or EMPr for decision making, but wish to respond directly as follows:

Greenmined's response:

- The proximity of the project to your client's property is acknowledged, and the DBAR has assessed potential impacts on neighbouring properties, including visual, noise, and dust impacts. Mitigation measures detailed in the DBAR will specifically address these potential impacts
- We acknowledge that your client's property is used as a hunting farm and that maintaining a clean, peaceful, and visually appealing environment is critical for their business.
- This project is for the mining of aggregates to support local infrastructure development, which will benefit the community, including the tourism industry.
- The project is small-scale and temporary, with no long-term effects expected.
- The applicant recognizes the importance of your client's contribution to local employment. Infrastructure upgrades facilitated by the project, such as improved roads, will enhance access and benefit both the local community and the tourism sector.
- We acknowledge that your client's concerns over the well-being of his wildlife,
- Mitigation measures will address potential impacts on wildlife, including:
- Dust suppression (water spraying).

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
--------------------------------	--	-----------------------	--------------------------

- Noise management (regulated operational hours).
- Regular environmental monitoring to ensure water and soil quality is maintained.
- These measures will reduce stress on wildlife and preserve their natural behaviours, ensuring minimal disruption to your client's operations
- We acknowledge concerns about increased traffic and road wear. The applicant is committed to:
- Implement measures to minimize disruption.
- Repairing and maintaining roads affected by project-related activities to ensure continued accessibility for all users.
- The visual impact of machinery will be mitigated through proper scheduling and limiting transport during peak tourist hours.
- This proposed mine will not only impact our client's current use, enjoyment and profitability, but it could also reduce the farm's value.
- The project will be temporary and carried out with full consideration of the current land uses.
- Aggregates are essential for upgrading local infrastructure, including roads, which will benefit the community, tourism, and the overall economy.
- While we note your concern regarding potential devaluation, these upgrades will enhance the area's appeal and accessibility in the long term.

THE VISUAL IMPACT

- The statement in the DBAR regarding the partial obscuring of the proposed mining activity by a hill is based on a detailed visual impact assessment conducted

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
--------------------------------	--	-----------------------	--------------------------

during the environmental study.

- Mitigation measures, have been designed to further reduce visual impacts from surrounding properties, including your client's.
- To address your concern, we acknowledge the importance of stakeholder validation and invite your client to participate in a site inspection to assess the proposed mitigation measures firsthand.
- Additionally, we will ensure that the final Basic Assessment Report includes comprehensive details of the visual impact assessment, reinforcing the effectiveness of the proposed mitigation measures.
- Further consultation is welcome to explore any specific additional assessments your client deems necessary to address this concern.

Mitigation measures to minimize these impacts include:

- Ensuring infrastructure and equipment adhere to low-profile designs with natural colour schemes to blend into the surrounding environment.
- Maintaining proper housekeeping to ensure a neat and organized appearance of the site at all times.
- Rehabilitation will be a priority upon completion of mining activities. This includes:
- Implementing a detailed rehabilitation plan to reintroduce indigenous vegetation and contour the land to blend with the natural landscape.
- Creating a final landform that is visually cohesive with the surrounding environment, ensuring the site maintains a neat and aesthetically pleasing appearance post-closure.
- These efforts aim to mitigate visual impacts during operations and restore the area to a state that supports its natural beauty and overall appeal.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION /PROPERTY DESCRIPTION

CONTACTED DATE

RESPONSE RECEIVED

NOISE LEVELS

- We acknowledge the concerns regarding noise and vibration impacts on the surrounding environment, your client's business operations, and wildlife.
- The DBAR outlines specific mitigation measures to address these impacts, which will be strictly enforced throughout the project lifecycle, including:
- Ensuring all machinery is fitted with silencers and is properly maintained to minimize noise emissions.
- Scheduling noise-intensive activities, such as blasting, during specific times to reduce disruption.
- Monitoring noise levels regularly to ensure compliance with national noise standards.
-

DUST

- We acknowledge that the DBARs confirm dust will be generated from activities such as blasting, soil displacement, crushing, screening, and material transport. The potential for dust nuisance is classified as a low to medium risk.
- It is important to emphasize that this project is temporary in nature, and dust generation will be limited to the operational phases of the mining and stockpiling activities. Post-mining rehabilitation will further reduce any residual dust impacts.
- A Dust Management Plan (DMP) will ensure compliance with air quality standards and address concerns about dust affecting wildlife and client operations.
- Comprehensive dust management measures will be implemented and strictly enforced, including:

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION /PROPERTY DESCRIPTION

CONTACTED DATE

RESPONSE RECEIVED

- Dust suppression methods such as regular water spraying on roads, stockpiles, and operational areas.
- The use of chemical dust suppressants where necessary to enhance control.
- Limiting the height of stockpiled materials to reduce windblown dust.
- Enforcing strict speed limits on gravel roads to minimize dust during material transport.
- Dust fallout will be regularly monitored to ensure levels remain within permissible standards.
- Monitoring stations will be installed to assess dust levels, particularly near sensitive areas such as water sources, grazing grounds, and accommodation facilities.
- Adaptive management strategies will be employed to respond promptly to any dust-related concerns that arise during high wind periods.
- By maintaining dust at minimal levels, the health of wildlife and the quality of meat produced will not be compromised.
- Dust management measures, including regular site inspections and enhanced dust suppression during high wind periods, will reduce the risk of dust affecting nearby accommodations.
- While we note the concerns raised regarding dust, the combination of robust dust suppression measures, regular monitoring, and the temporary nature of the project will ensure that dust impacts are effectively managed and do not result in long-term effects.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION /PROPERTY DESCRIPTION

CONTACTED DATE

RESPONSE RECEIVED

THE ROAD

- As mentioned above we acknowledge concerns about increased traffic and road wear. The applicant is committed to:
- Implement measures to minimize disruption.
- Repairing and maintaining roads affected by project-related activities to ensure continued accessibility for all users.
- The visual impact of machinery will be mitigated through proper scheduling and limiting transport during peak tourist hours.

CONCLUSION

- The proposed project is temporary, small-scale, and designed with strict mitigation measures to minimize environmental and social impacts.
- The aggregates produced will support necessary infrastructure improvements, benefiting the local community, tourism, and economic development.
- We confirm that your response will be included to the final BAR and EMPr for decision making to DMRE for them to refer the objection to the Regional Mining Development and Environmental Committee, as per Section 10(2) of the MPRDA.

We appreciate engagement and welcome any additional feedback or queries. Please do not hesitate to contact us in the event of any uncertainties.

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
Mr H Rickert	Surrounding Landowner Farm Honingvley 99 Portion 7 Farm Honingvley 99 Portion 11	14 October 2024	No Comments Received

SUMMARY OF PARTICIPATION PROCESS

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

- telephonic discussions;
- direct communication with notification emails inviting comments;
- placement of on-site notices; and
- placement of an advertisement in Platinum Bushvelder on 18 October 2024.

Response received from:

Boshoff Smuts Inc. representing surrounding landowner Mr A Aucamp from Farm Vaalpenspan 90

SUMMARY OF PARTICIPATION PROCESS

A 40-day commenting period was allowed for perusal of the documentation and submission of comments.

Please refer to Appendix F1 and F2 proof of the correspondence with the I&AP's and stakeholders during the public participation process.

-END OF COMMENTS AND RESPONSE-