



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

Directorate: Land Use and Soil Management

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Enquiries: Lutendo Netshilema **Date:** 02/03/2020

Afrimat (PTY) Ltd

P.O.BOX 768

Bellville

6850

File reference number: WC 30/5/1/2/3/2/1(401) EM

**RE: COMMENTS ON THE DRAFT SCOPING REPORT ENVIRONMENTAL AUTHORISATION
FOR AN EXTENSION OF DOLOMITIC LIMESTONE MINE AND CONSTRUCTION OF LIME
KILNS ON FARM WELVERDIEND NEAR VANRHYNSDORP, WESTERN CAPE PROVINCE.**

Department of Agriculture, Fisheries & Forestry Directorate: Land Use and Soil Management administer and implement the Conservation of Agricultural Resources Act, (CARA) 43 of 1983). The Act is regarded as one of the principal Acts governing the protection of agricultural and other natural resources. The main aim of the Act is to control the utilization of natural agricultural resources to ensure the conservation of soil, water and vegetation, as well as the combating of alien and invasive plants. According to Section 1 of the Act, conservation of natural agricultural resources includes the protection, restoration as well as the reclamation thereof.

The objectives of CARA are to provide for the conservation of the natural agricultural resources through maintaining the production potential of the land, combating and prevention of erosion, preventing the weakening or destruction of the water resources, protecting the vegetation and combating weeds and invader plants.

In order to achieve the objectives, certain control measures may be prescribed which shall be complied with by the land users and which may relate to:

- All slopes and degraded areas should be rehabilitated prior to the onset of the rainy season to prevent surface water run-off and top soil should be utilize as much possible in these areas. According to Regulation 3, sub-regulation 3 (1) "Except on authority of a written permission by the executive officer, no land user shall cultivate any land if it"
 - (a) has a slope of more than 20 per cent; or
 - (b) has a slope of more than 12 per cent, is situated in an area specified in column 1 of Table 1, consist mainly of soil of a soil form and soil series respectively specified in columns 2 and 3 of the said Table opposite the area concerned and, if applicable, has such physical properties as may be specified in column 4 of the said Table opposite the soil series concerned."
- Topsoil comprises the soil-cover including all the vegetation, organic matter and etc. Soil that will be removed must be kept separate for later re-use. It should be done in a manner to retain any suitable vegetation on the land concerned in order to expedite the restoration and reclamation thereof and prevent wind and water erosion throughout the period. To improve the soil health of the area, the bare areas should be re-seeded with annual grass and pioneer plant species which have been found to establish in these soils and in the area.
- The land owner/user must protect the cultivated land before/during/after the cultivation of the proposed sites effectively against excessive soil loss as a result of erosion through the action of water and wind.
- Monitoring and evaluation procedures should be put in place to determine if there is any improvement and to ascertain if more rehabilitation initiatives are needed or if the area should be left to spontaneously rehabilitate. However the continuous rehabilitation program will attempt the area to an acceptable standard to accommodate agricultural activities.
- Applicant or land owner must protect all areas susceptible to erosion by preventing storm water. Develop producers to minimize surface water run-off and soil erosion.
- According to Regulation 4, sub-regulation 1 (a) "Every land user shall by means of as many of the following measures as are necessary in his situation, protect the cultivated land on his farm unit effectively against excessive soil loss as a result of erosion through the action of water":

- (a) A suitable soil conservation work shall be constructed and thereafter be maintained in order to divert run-off water from other land or to restrict the run-off speed of run-off water."
- According to Regulation 5, sub-regulation 1 (a) (j) "Every land user shall by means of as many of the following measures as are necessary in his situation, protect the cultivated land on his farm unit effectively against excessive soil loss as a result of erosion through the action of wind":
 - (a) The land concerned shall be cultivated in accordance with such method or be laid out in such manner that the surface movement of soil particles through the action of wind is restricted.
 - (j) A suitable soil conservation work shall be constructed and thereafter be maintained in order to restrict the surface movement of soil particles through the action of wind."
- According to regulation 7 sub-regulation (1) "Subject to the provisions of the water Act 1956 (Act 54 of 1956), and sub-regulation (2) of this regulation, no land user shall utilize the vegetation in vlei, marsh or water sponge or within the flood area of a water course or within 10 metres horizontally outside flood area in a manner that causes or may cause the deterioration of or damage to the natural agricultural resources". It is recommended that a **32m buffer** zone is kept in a natural condition.
- The restoration or reclamation of eroded land; Regulation 13, sub-regulation 1 & 2. (1) "Every land user shall by means of as many of the measures set out in regulations 4,5 and 9 as area necessary in his situation, effectively restore and reclaim the land on his farm unit on which excessive soil loss due to erosion occurs or has occurred".
 - (2) If the executive officer is satisfied that the measures applied by a land user in a particular case in terms of sub-regulation (1) are not sufficient to restore or reclaim land on which excessive soil loss due to erosion occurs or has occurred, he may direct such land user in writing to apply such additional measures as the executive officer may determine."
- Regulation 14 "If a land user disturbs or denudes any land on his farm unit for purposes other than prospecting or mining activities"; (c) such land user shall by means of as many of the following measures as are necessary in his situation, effectively restore and reclaim that disturbed or denuded land. (i) Topsoil shall be removed and kept separate with a view to replacing it later on the disturbed or denuded land. (ii)Topsoil shall be used to stabilise the sides of a hollow that has been caused by the exploitation or removal of material and, where possible, to reclaim part of the disturbed or denuded

land. (iv) The flow pattern of run-off water, the topography and the slope shall, depending on the volume of material exploited or removed, be restored as closely as possible to the original condition. (v) Suitable vegetation shall be established on the land concerned in order to expedite the restoration and reclamation thereof. (vi) The land concerned shall be fenced off and withdrawn from grazing until such time as vegetation has been sufficiently restored or established. (vii) A suitable soil conservation work shall be constructed and thereafter be maintained in order to protect the land concerned against excessive soil loss through the action of water or wind or in order to collect sediment from run-off water.

- It is stated in the report that aliens species recorded include *Limonium sinuatum*, *Prosopis glandulosa* and *Nerium oleander* are declared as alien invader, such plants need to be controlled and removed annually (on going clearing programs) as they can cause damage to the surrounding natural vegetation. According to Conservation of Agricultural Resources Act, (Act 43 of 1983) , Regulation 15E methods of controlling alien plants are as follow:
 - Uprooting; felling; cutting or burning
 - Treatment with a weed killer that is registered for use in connection with such plants in accordance with the directions for the use of such
 - Biological control carried out in accordance with the stipulations of the Agricultural Pests Act,(Act no 36 of 1983)

Combination of one or more methods mentioned above, and any action taken to control alien plants shall be executed with caution and in a manner that will cause least possible damage to the environment.

The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours sincerely

A handwritten signature in dark ink, appearing to be "M. L. Baker", is written above a horizontal line.

pp. EXECUTIVE OFFICER: Act No 43 OF 1983

Director: Land Use and Soil Management

DEPARTMENTAL REFERENCES:

16/3/3/6/4/2/2/F3/16/3019/20 (Development Management)
19/3/2/4/F3/16/DDF005/20 (Pollution and Chemicals Management)
19/2/5/3/F3/16/WL0009/20 (Waste Management)
19/4/4/BM1 – Lime kilns on Farm Welverdiend (Air Quality Management)

DATE: 10 March 2020

The Board of Directors
Afrimat (Pty) Ltd
P.O. Box 768
BELLVILLE
6850

For attention: Ms Ntsanko Ndlovu

Cell: 082 728 8975

E-mail: ntsanko.ndlovu@afrimat.co.za

PER E-MAIL

Dear Madam

COMMENT ON THE DRAFT SCOPING REPORT AND PLAN OF STUDY FOR ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED EXTENSION OF A LIMESTONE MINE, DEVELOPMENT OF A CRUSHING PLANT AND THE CONSTRUCTION OF FOUR LIME KILNS AND ASSOCIATED INFRASTRUCTURE ON THE FARM WELVERDIEND NO. 511, VANRHYNSDORP (DMRE REFERENCE: WC30/5/1/2/3/2/1(401)EM)

The e-mail correspondence of 10 February 2020 notifying potential interested and affected parties ("I&APs") of the availability of a Background Information Document ("BID"), and the Draft Scoping Report ("DSR") dated February 2020 that was received by the Department on 10 February 2020, refer.

The Department notes that the application is a resubmission of a Scoping & Environmental Impact Reporting ("S&EIR") application that was withdrawn by the applicant. Comments are hereby offered by various Directorates within the Department based on the information provided in the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated February 2020, and information provided during the previous S&EIR application.

1. Directorate: Development Management (Region 1) – Mr Rainer Chambeau (Rainer.Chambeau@westerncape.gov.za; Tel: (021) 483 2729):
 - 1.1 Clarity is requested on the property description of the farm earmarked for the proposed development. The DSR indicates that the applicant wishes to undertake the proposed development on Portion 4 of the Remainder of the Farm Welverdiend No. 511. It is further noted that the applicant is in possession of a mining right issued on 19 June 2012 for mining of 321ha of limestone and dolomite on the Remainder of the Farm Welverdiend No. 511. This Directorate further granted an environmental authorisation ("EA") on 5 June 2015 for mining operations and associated infrastructure with a development footprint of approximately 8ha on the Remainder of Farm Welverdiend No. 511. Table 1, page 4 of the DSR indicates the Surveyor-General ("SG") Code for the proposed development site as C0780000000005110000. It thus appears that development is proposed on the Remainder of the Farm Welverdiend No. 511. Please confirm whether the proposed development will be undertaken on the Remainder of the Farm Welverdiend No. 511; or on Portion 4 of the Remainder of the Farm Welverdiend No. 511. If the latter, please provide the correct SG Code for Portion 4 of the Remainder of the Farm Welverdiend No. 511.
 - 1.2 The BID and DSR indicate that Activity 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) is applied for as the proposed development will entail the clearance of vegetation within portions of a Critical Biodiversity Area. The Draft Biodiversity Assessment dated February 2017 compiled by Mark Berry Consultants did not identify any endangered or critically endangered ecosystems on the proposed site listed in terms of the *National List of Ecosystems that are Threatened and in Need of Protection* published in Government Notice ("GN") No. 1002 of 9 December 2011 in terms of section 52(1)(a) of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004). Activity 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) is therefore not applicable to the proposed development.
 - 1.3 CapeNature must be consulted whether the Draft Biodiversity Assessment dated February 2017 and follow-up survey undertaken by the botanical specialist on 6 August 2018 is adequate for decision-making, or whether further assessments are required.
 - 1.4 Please be advised that Activity 17 of Listing Notice 2 of the EIA Regulations, 2014 (as amended) must be applied for and included in section 3.2 of the DSR.
 - 1.5 Your attention is drawn to GN No. 960 of 5 July 2019: Notice of the Requirement to Submit a Report generated by the National Web Based Environmental Screening Tool in terms of section 24(5)(h) of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") and regulation 16(1)(b)(v) of the EIA Regulations, 2014 (as amended). Please note that the submission of a report generated from the National Web Based Environmental Screening Tool ("screening tool") became a compulsory requirement from 4 October 2019 when applying for EA in terms of regulations 19 and 21 of the EIA Regulations, 2014 (as amended).
 - 1.5.1 A screening report is attached hereto as Appendix A for your consideration, which identified several specialist studies to be undertaken. Please note that according to the attached screening report, the proposed site is located within a medium sensitivity area from an agricultural perspective, a high sensitivity area from an animal species theme perspective, a low sensitivity area from an aquatic

biodiversity perspective and a defence theme perspective, a medium sensitivity area from a civil aviation theme perspective and a relative plant species theme perspective, and a very high sensitivity area from a terrestrial biodiversity perspective. It is the responsibility of the environmental assessment practitioner ("EAP") to confirm whether these specialist studies will be undertaken, or to provide a motivation why the specialist studies will not be conducted or deemed necessary for the undertaking of the EIA process. The Plan of Study for EIA must accordingly be amended to indicate which additional specialist studies will be undertaken.

- 1.6 The Draft EIA Report must provide a schematic indication of the proposed strip mining process across the proposed 34ha mining area. Photographs of the applicant's existing limestone and dolomite mining operations on the Farm Vaderlandsche Rietkuil, which is situated 7km east of the proposed site, may be included in the Draft EIA Report to provide a visual representation of what the proposed mining operations on the proposed site would entail.
- 1.7 If available, the co-ordinates of the following components of the proposed development must be provided in the Draft EIA Report. Alternatively, the components of the proposed development must be depicted on a map at an appropriate scale that indicate the following components of the proposed development:
 - 1.7.1 Internal roads;
 - 1.7.2 Primary and secondary crushing plants;
 - 1.7.3 Lime kilns/ fluid bed calciners;
 - 1.7.4 Waste salvage yard;
 - 1.7.5 Any offices or buildings;
 - 1.7.6 Coal loading area;
 - 1.7.7 Diesel tanks, and
 - 1.7.8 Any "no-go" areas identified by various specialists and the EAP.
- 1.8 This Directorate notes that a water use application for the abstraction of groundwater for dust suppression purposes will be submitted to the Department of Water and Sanitation ("DWS"). (In this regard, also refer to paragraph 2.2 below.) The Draft EIA Report must clearly indicate the type of water use application applied for, i.e. whether a General Authorisation or water use licence is required. Comments from the relevant water use authority must be obtained and included in the Draft EIA Report. As indicated during the previous S&EIR application, if the "One Environmental System" is applicable to this application, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the National Water Act, 1998 (Act No. 36 of 1998), the applicant would be required to apply the requirements of the One Environmental System to this application.
- 1.9 Please note that the Final Scoping Report ("FSR") to be submitted to the competent authority must include proof of notifying I&APs of the BID and the DSR. The proof must include, *inter alia*, the following:
 - 1.9.1 If registered or regular mail was sent, a list of the recipients of the registered or regular mail, as obtained from the post office;
 - 1.9.2 If a facsimile was sent, a copy of the facsimile report and transmission receipt;
 - 1.9.3 If an electronic mail was sent, a copy of the electronic mail sent and delivery reports; and
 - 1.9.4 If a "mail drop" was done, a signed register of "mail drops" must be provided.

- 1.10 A description of the policy and legislative context within which the development is proposed, including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks, and instruments that are applicable to the proposed development, must be included in the FSR and Draft EIA Report.
- 1.11 It is noted on page 46 of the DSR that the proposed project entails an increase in the mining activities in the region, which may lead to an increase in traffic. Traffic impacts must be investigated as part of the proposed development and reported on in the Draft EIA Report. In this regard, comments from the District Roads Engineers must be obtained and included in the Draft EIA Report.
- 1.12 A copy of the EAP's Curriculum Vitae and expertise must be included in the FSR. Furthermore, the findings of the externally appointed review EAP on all documents reviewed, must be included with the submission any reports to the competent authority.
- 1.13 Please include a table of contents in the FSR.
2. Directorate: Pollution and Chemicals Management – Mr Hassan Parker (Hassan.Parker@westerncape.gov.za; Tel: (021) 483 6877):
- 2.1 The DSR identifies the potential for contamination of runoff emanating from the proposed site, and the need for the implementation of a storm water management plan. A storm water management plan for inclusion in the Draft EIA Report is supported.
- 2.2 This Directorate notes that a water use application will be submitted for the use of groundwater for dust suppression purposes. The use of potable water for dust suppression is generally not supported and it is advised that other dust mitigation measures be investigated and reported on.
- 2.3 Please confirm whether the proposed mining area overlie an important aquifer. The static water level(s) of any such underlying aquifer(s) must be indicated in the Draft EIA Report.
- 2.4 Figure 38, page 41 includes reference to bunded 30m³ diesel tanks. Please be advised that the applicability of Activity 10 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) must be investigated and reported on in the FSR and Draft EIA Report. The impacts associated with the potential listed activity must be reported on in the Draft EIA Report and Environmental Management Programme ("EMPr").
- 2.5 Page 15 refers to waste oil and a waste storage oil area. The Draft EIA Report and EMPr must provide additional information on the source and handling of the waste oil and the proposed location of the storage area.
3. Directorate: Waste Management – Mr Gary Arendse (Gary.Arendse@westerncape.gov.za; Tel: (021) 483 6307):
- 3.1 Impacts related to the storage and disposal of coal ash must be assessed and reported on during the EIR phase of the application.

4. Directorate: Air Quality Management – Mr Peter Harmse (Peter.Harmse@westerncape.gov.za; Tel: (021) 483 4383):
- 4.1 It is noted that an application for an atmospheric emission licence ("AEL") will be submitted to the national department responsible for environmental affairs. As per paragraph 1.8 above, the requirements of the One Environmental System would also apply to the AEL application, specifically in terms of the synchronisation of the consideration of the application in terms of the NEMA and the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEM:AQA").
- 4.2 Please note the requirements of section 38(3)(b) of the NEM:AQA, stipulating the publication of a notice in at least two newspapers circulating in the area in which the AEL listed activity is applied for.
5. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.
6. The Department reserves the right to revise or withdraw comments or request further information based on any information received.

Yours faithfully



pp **HEAD OF DEPARTMENT**

DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING

FILE MESSAGE

Ignore Delete Reply Reply All Forward More Meeting Move to: ? To Manager Team Email Done Reply & Delete Create New Rules OneNote Actions Move Mark Unread Categorize Follow Up Translate Find Related Select Zoom

Mon 10/02/2020 15:29
Ntsanko Ndlovu <ntsanko.ndlovu@afrimat.co.za>
Invitation to Comment: RE: Environmental Authorisation for an Extension of Dolomitic Limestone Mine and Construction of Lime Kilns on Farm Welverdiend near Vanrhynsdorp, Western Cape Province

To
Bcc 'Nick Helme'; 'Elize Olivier'; 'Malcolm Lamour'; botaneelc@iafrica.com; malcolm.lamour@westerncape.gov.za; gamanuel@wcdm.co.za; 'Derrick Makhubele'; dva@rylan.co.za; Adri.LaMeyer@westerncape.gov.za; 'Gerhard Gerber'; daantjie@malan.co.za; hfprins@wcdm.co.za; ndejongh@wcdm.co.za; dkotze@wcdm.co.za; cjmalherbe@wcdm.co.za; aduffell-canham@capenature.co.za; frans.hanekom@westerncape.gov.za; bsmit@matzikamamun.co.za; henri.fortuin@westerncape.gov.za; munman@matzikamamun.co.za; kalliel@matzikamamun.co.za; Nomjilal@dws.gov.za; wiedermanne@dws.gov.za; anso@pokrhaal.co.za; 'Bernette Kriek'; collab@matzikamamun.co.za; 'Bruce Maarmann'; 'Annali Van der Westhuizen'; d'mitri.mathews@westerncape.gov.za; RahabM@daff.gov.za; dikeledik@elsenburg.com; mariusdr@elsenburg.com; 'Gerswain A. Manuel'

This message was sent with High importance.

Message Welverdiend Mine Extension -BID.pdf (640 KB)

Dear interested and affected party

Cape Lime (Pty) Ltd, a subsidiary of Afrimat (Pty) Ltd, has applied for an Environmental Authorisation to extend the current mining area of dolomitic limestone mine and construction of limekilns on Portion 4 of Remainder Farm Welverdiend No 511.

Please find attached a Background Information Document (BID) which will provide you with further information regarding the proposed project. **The BID has a registration sheet** – please be so kind to complete the registration sheet and return it to us by **Tuesday 10th March 2020**.

Should you have any questions or need additional information, please do not hesitate to contact us.

Your participation is crucial and will be highly appreciated.

Kind Regards

See more about Ntsanko Ndlovu.



REGISTERED LETTER GEREGISTREERDE BRIEF (with an insurance option/met 'n versekering)		REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC 161 013 456 ZA CUSTOMER COPY 301028R		Postage paid R <u>38.30</u> Service fee/Diensgeld R _____ Insurance/Versekering R _____ Total/Totaal R _____	
Full tracking and tracing/Volledige volg en spoor Addressed to/Geadresseer aan <u>The Orkney Trust</u> <u>Carriem Stot 4</u> <u>7708</u> <div style="border: 1px solid black; display: inline-block; padding: 2px;">7708</div> Postcode Postkode		Insured value of contents Versekerde waarde van inhoud R _____		Enquiries/Navrae Toll-free number Tolvry nommer 0800 111 502 Affix Track and Trace customer copy Plate Volg-en-Spoor-klëntafskrif	
The value of the contents of this letter is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100.00. No compensation is payable without documentary proof. Optional insurance up to R2 000.00 is available and applies to domestic registered letters only. Die waarde van die inhoud van hierdie brief is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100.00. Geen vergoeding is sonder dokumentêre bewys betaalbaar nie. Opsionele versekering tot R2 000.00 is beskikbaar en is slegs op binnelandse geregistreerde briewe van toepassing.		Initial of accepting officer _____ Date stamp SOUTHGATE 07 FEB 2020 Datumstempel 5 2082		701281	

REGISTERED LETTER GEREGISTREERDE BRIEF (with an insurance option/met 'n versekering)		REGISTERED LETTER (with a domestic insurance option) ShareCall 0860 111 502 www.sapo.co.za RC 161 013 439 ZA CUSTOMER COPY 301028R		Postage paid R <u>38.30</u> Service fee/Diensgeld R _____ Insurance/Versekering R _____ Total/Totaal R _____	
Full tracking and tracing/Volledige volg en spoor Addressed to/Geadresseer aan <u>N.A. Helm</u> <u>Box 22652</u> <div style="border: 1px solid black; display: inline-block; padding: 2px;">7975</div> Postcode Postkode		Insured value of contents Versekerde waarde van inhoud R _____		Enquiries/Navrae Toll-free number Tolvry nommer 0800 111 502 Affix Track and Trace customer copy Plate Volg-en-Spoor-klëntafskrif	
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Full tracking and tracing/Volledige volg en spoor Addressed to/Geadresseer aan <u>Wan van Niekerk</u> <u>Box 7</u> <div style="border: 1px solid black; display: inline-block; padding: 2px;">8170</div> Postcode Postkode		Insured value of contents Versekerde waarde van inhoud R _____		Enquiries/Navrae Toll-free number Tolvry nommer 0800 111 502 Affix Track and Trace customer copy Plate Volg-en-Spoor-klëntafskrif	
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Full tracking and tracing/Volledige volg en spoor Addressed to/Geadresseer aan <u>JT TUBES</u> <u>Box 164</u> <div style="border: 1px solid black; display: inline-block; padding: 2px;">8170</div> Postcode Postkode		Insured value of contents Versekerde waarde van inhoud R _____		Enquiries/Navrae Toll-free number Tolvry nommer 0800 111 502 Affix Track and Trace customer copy Plate Volg-en-Spoor-klëntafskrif	
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REGISTERED LETTER GEREGISTREERDE BRIEF (with an insurance option/met 'n versekeringsopsie)		Post Office	
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Addressed to/Geadresseer aan Nuweden BOERDERY Box 128		Insured value of contents Versekerde waarde van inhoud R	
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8170 Postcode Postkode		Initial of accepting officer 07 FEB 2020 stamp 5 2082	

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Addressed to/Geadresseer aan J.J. Prins Box 123		Insured value of contents Versekerde waarde van inhoud R	
The value of the contents of this letter is as indicated and compensation is not payable for a letter received unconditionally. Compensation is limited to R100.00. No compensation is payable without documentary proof. Optional insurance up to R2 000.00 is available and applies to domestic registered letters only. Die waarde van die inhoud van hierdie brief is soos aangedui en vergoeding sal nie betaal word vir 'n brief wat sonder voorbehoud ontvang word nie. Vergoeding is beperk tot R100.00. Geen vergoeding is sonder dokumentêre bewys betaalbaar nie. Opsionele versekering tot R2 000.00 is beskikbaar en is slegs op binnelandse geregistreerde briewe van toepassing.		Enquiries/Navrae Toll-free number Tolvry nommer 0800 111 502	
8170 Postcode Postkode		Initial of accepting officer Date stamp 07 FEB 2020 5 Datumstempel 2082	

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Addressed to/Geadresseer aan Nuweden BOERDERY CC Box 128		Insured value of contents Versekerde waarde van inhoud R	
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8170 Postcode Postkode		Initial of accepting officer Date stamp 07 FEB 2020 5 Datumstempel 2082	

Ntsanko Ndlovu

From: Devlin Fortuin <Devlin.Fortuin@westerncape.gov.za>
Sent: 13 March 2020 13:52
To: ntsanko.ndlovu@afrimat.co.za
Subject: (Job 23256) Lime Kilns of Farm Welperdiend

This message is from an external address

Good Day

Your letter to interested and affected parties referenced 30/5/1/2/3/2/1(401) dated 6 February 2020 refers.

It appears as if this proposal will take access from the N7. However please keep this Branch informed as an interested and affected party

Kind Regards

Devlin Fortuin *PrEng*
Production Engineer
Directorate: Road Planning
Transport and Public Works
WESTERN CAPE GOVERNMENT

Address: 9 Dorp Street, Cape Town 8001; Private Bag X9185, Cape Town 8000
Tel: +27 21 483 2012
Fax: +27 21 483 2205
E-mail: devlin.fortuin@westerncape.gov.za

Website: www.westerncape.gov.za



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**WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY**

Rig alle korrespondensie aan:
Address all correspondence
to:

**MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER**

Navrae/Enquiries : Doretha Kotze
Verw.Nr./Ref. No.: 13/2/12/2/3



Posbus / P O Box 242
MOORREESBURG, 7310

Telefoon/Phone (022) 433 8400
Faks/Fax Nr. 086 6926 113

E-Mail Adres/Address :
westcoastdm@wcdm.co.za

10 March 2020

ATTENTION: NTSANKO NDLOVU
Email: mining@afrimat.co.za

Afrimat
PO Box 768
BELLVILLE
7535

Sir

**DRAFT SCOPING REPORT: PROPOSED EXTENSION OF DOLOMITIC
LIMESTONE MINE AND CONSTRUCTION OF LIME KILNS ON FARM
WELVERDIEND NO 511, VANRHYNSDORP**

1. I refer to your letter dated 6 February 2020 and the Draft Scoping Report for the proposal.
2. The West Coast District Municipality's comments on the proposal are largely the same as the comments provided during the previous Environmental Assessment Phase which was withdrawn on 31 May 2019 and are summarised below:
 - 2.1 An application for an Atmospheric Emissions License must be submitted to the relevant competent authority in terms of Section 36(5)(e) of the National Environmental Management: Air Quality Act, Act 39 of 2004.
 - 2.2 The National Dust Control Regulations, no R827 dated 1 November 2013 must be complied with during the construction and operational phases of the development. A dust monitoring programme must be established to determine the potential increase of dust pollution.
 - 2.3 The West Coast District Municipality's Air Quality Officer may call for additional requirements on receipt of specialist reports and the EMP.

2/...

- 2.4 The mining area must be properly demarcated prior to commencement of mining activities.
- 2.5 A portion of the proposed mining area is demarcated as a Critical Biodiversity Area (CBA). Mining poses the greatest threat to this area, since it is species rich and potentially more sensitive and difficult to rehabilitate. The CBA must be excluded from the mining area, properly demarcated as a no-go area and offset for conservation purposes.
- 2.6 Alternatives in terms of project and site must be investigated. In terms of the environmental sensitivities, it is recommended that alternative layouts and designs be considered for the extension area. All CBA areas should be considered no-go areas and demarcated as buffer areas where no mining should be allowed.
- 2.7 The impact on biological linkage is significant, due to the proposed mining site's southern boundary intruding into a designated CBA associated with the Wiedou River. Loss of designated CBA's must be avoided and the proposed mining area should be moved northwards, out of the CBA. A buffer of 250 to 300 meters between the Wiedou River and mining activities should be maintained at all times to secure drainage lines and prevent erosion.
- 2.8 A detailed rehabilitation plan with rehabilitation measures and methods must be provided. Information regarding the proposed future use of the land after mine closure must be submitted. During rehabilitation only species indigenous to the West Coast must be used, together with species collected during the search and rescue. The Rehabilitation Plan must provide detailed cost estimates.
- 2.9 In terms of NEM: BA an alien eradication and monitoring plan needs to be compiled to address alien vegetation management and to control invasive species (*Prosopis* spp, etc) on the property.
- 2.10 All adjacent landowners and interested and affected parties must be notified of the application as part of the public participation process and should be given the opportunity to comment.
- 2.11 Only existing roads on the property may be used and no new roads are to be created through natural veld.
- 2.12 The impact of groundwater extraction on other users in the surrounding area, especially agricultural users, should be investigated. Groundwater in the area is limited and compromising this resource will have severe negative impacts on the agricultural sector.

- 2.13 The comments of the Provincial Department of Transport and Public Roads must be obtained regarding the impact of heavy vehicle traffic on surrounding public roads.
- 2.14 The requirements of all relevant legislation must be observed. Prior to any mining or construction activities taking place, the approval of Matzikama Municipality must be obtained in terms of the Municipal Bylaw on Land Use Planning.

Yours faithfully



MR D JOUBERT
MUNICIPAL MANAGER
/dk

01 Goldengroove
Cnr Oosthuizen and Leiphodt
Germiston
1401
27 November 2020

Attention: Ntsanko Ndlovu
Afrimat Shared Services (Pty) Ltd
PO Box 5278
Tyger Valley,
7536

ENVIRONMENTAL AUTHORISATION FOR AN EXTENSION OF DOLOMITIC LIMESTONE MINE AND CONSTRUCTION OF LIME KILNS ON FARM WELVERDIEND NEAR VANRHYNSDORP, WESTERN CAPE PROVINCE.

DMR Reference Number: WC 30/5/1/2/3/2/1(401) EM

Biogeotech Environmental Services was appointed by **AFRIMAT** to undertake an independent review on the Environmental Impact Assessment Draft Report of the above subject or site in terms of section 13 of EIA regulations 2014, as amended in 2017.

After reviewing the Draft Environmental Impact Assessment Report, Environmental Management Programme and its attachments, the following comments are submitted:

- The Agricultural study is outlined on the Baseline of the EIA but the impacts are not assessed on Appendix E. This will need to be addressed for consistency.
- The Financial provision is outdated; please ensure you insert the recent one, both in the EIA report and Rehabilitation Plan.
- The maps on Rehabilitation plan need to be updated as the used one is no longer feasible given the changes on the ground, the plan still make reference to the old maps.
- The newspaper advert still describes the NEMA EIA listed activities and NWA Water uses, please ensure to include NEM: AQA listed activities for the AEL. The same changes should be reflected on the site notices for consistency.
- In addition to the above, please ensure that at least the advert is published in two newspapers as required for AEL applications.
- Ensure that the figure numbers correlates with content of the report, e.g, certain sections in the report mentions figure below while it's actually figure 10.
- Also be consistent with the font sizes on paragraphs for the neatness of the document.

In conclusion, the above comments should be addressed in finalising the documents and a copy of the revised should be shared with us. If all are addressed, the report should be ready for submission to the competent authority.

If any inconsistency arises and clarifications required, please do not hesitate to contact us on the subject matter matte.

Yours sincerely

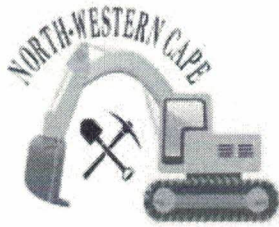
Victor Manavhela

Principal Specialist-Environmental Management

Email: info@biogeotech.co.za



Date: 27 November 2020



MINING FORUM

NORTH-WESTERN CAPE MINING FORUM

BEEHIVE 23

A.A.S. LE FLEUR STREET

VREDENDAL

8160

CELL: 063 806 1277/ 079 9562 704/ 072 5033 409

E- mail: nwcminingforum@gmail.com

Reg.no: 229 – 888 NPO

17 February 2020

Mr/Ms Ntsanko Ndlovu
Afrimat Aggregates (Pty) Ltd
P.O. Box 768
Belville
6850

E-mail: ntsanko.ndlovu@afrimat.co.za

Dear Sir/ Madam

**COMMENTS ON APPLICATION FOR ENVIRONMENTAL AUTHORISATION - DMR REF: WC
30/5/1/2/3/2/1(401) EM**

Your notice in Ons Kontrei, 7 January 2020 refers.

Please find our comments on the prospecting right application with above – mentioned reference number.

No serious substantial and meaningfull effort before and after 1994 has been made by the private and public sector to promote ownership and management of locally Historically Disadvantaged South Africans in the mining industry in the Matzikama and West Coast areas.

Environmental Authorisations, Mining Permits and Rights in the Matzikama municipal area and the West Coast has for years been granted to a few mining companies which dominate the mining industry for decades, without any substantial transformation and/or proof of ownership and management by locally based Historically Disadvantaged South Africans.

The continuous granting of new and/or additional Integrated Environmental Authorisations and Prospecting and Mining permits and Rights in the above – mentioned area, in the Matzikama municipal area and along the West Coast of South Africa is detrimental to the participation and equitable access to mineral resources of locally based Historically Disadvantaged South Africans in future mining operations and to benefit from exploitation of the mineral resources of the area.

We ask for a full and thorough research and investigation by the Department of Mineral Resources and Energy regarding the status of current mining rights and its holders, as well as the remaining mineral deposits in the area. Our association has nothing against any new economic developments that will create jobs, but the duration of the validity periods for authorisations, permits and rights are too long to ensure that our concerns will be effectively addressed after commencement of any new environmental and/or mining development activities and/or operations. Therefore, we want a written commitment with implementation timeframes and guidelines by all stakeholders, before we will agree on new approvals.

We, thus, ask that the application of Cape Lime (Pty) Ltd not been granted and that no activities/ operations under it commence until all issues as set out above have been properly attended to.

A moratorium must be put on the granting of all new environmental and mining authorisations, permits and rights and related authorisations by the relevant authorities, until all stakeholders in the mining industry in the area urgently engage in a structured and constructive manner and agreed in writing on the conditions under which mining operations will be conducted in future in the areas. This can be done through arrangement of a Mining Summit/Indaba by the DMRE.

Such written agreement must promote the principles of the Constitution and relevant legislation with due regard to access of new entrants and emerging/ small - scale miners from the Historically Disadvantaged communities in the area to the mining industry and the promotion of ownership and management of mining companies by local Historically Disadvantaged South Africans.

Alternatively and/or additionally we will agree to the granting of this application and any other existing and future applications (with the necessary change of details) under the following substantial conditions:

1. That this applicant, Cape Lime (Pty) Ltd must enter into a partnership agreement for its existing operations and proposed expansions with local historically disadvantaged small – scale/ emerging miners through the North Western Cape Mining Forum and/or its member companies within one (1) month after the granting of the authorization. The agreement must include *inter alia*:

- i) Ownership and management arrangements/
- ii) Procurement and Sub - contracting
- iii) Skills development and Mentorship
- iv) Financial and technical arrangements/ Investment
- v) The existing Environmental Management Plan and Social and Labour Plan
- vi) Environmental/ Water Use/ Heritage considerations
- vii) Tailings/ Stockpiling and Secondary Minerals

- As a show of good faith Cape Lime (Pty) Ltd must immediately engaged with North Western Cape Mining Forum to formulate and agree on the Partnership Agreement through a Memorandum of Understanding prior to the authorization approval.
- It must be noted that local historically disadvantaged small – scale/ emerging miners do not have the financial and technical capacity of big established companies to contribute. Relevant financial and other institutions (for example DTI and Mintek) must be approached for assistance.

2. That the DMRE, Matzikama Municipality and other relevant stakeholders, must play a facilitatory, monitoring and supportive role in the finalization of the above – mentioned agreement.

3. That Cape Lime (Pty) Ltd must explicitly and comprehensively mention/refer to the meaningful inclusion and participation of local small – scale/ emerging miners in the supply/ production value chain in their Basic Assessment Report, Environmental Management Plan and Social and Labour Plan.


4. That all future granting of environmental and mining authorisations and permits/ licences/ rights in our area must make provision for the meaningful inclusion and participation of locally based historically disadvantaged small – scale/ emerging miners in the mining industry.

5. We strongly believe that our proposed partnership and collaboration can serve as an example of best practice and/or a pilot project in taking the mining industry and our local communities forward in future. This can harmonize and stabilize the local mining industry, increase economic growth and promote employment and skills development opportunities.

We will continue to play a constructive role in promoting the full inclusion and due regard of small - scale/ emerging miners in the relevant policy and legislative framework as an equal and important industry stakeholder.

Our association will work together to promote sustainable economic development and also believe that established mines and small – scale/emerging miners can co – exist. However, the challenge of transformation and inclusion/participation of local historically disadvantaged South Africans with regard to ownership and management in the mining industry in the area, remains our main concern.

Kind regards



Cupido Filton
Secretary