

DEPARTMENTAL REFERENCES:

16/3/3/6/4/1/2/F3/17/3038/20 (Development Management)
19/3/2/4/F3/17/DDF009/20 (Pollution and Chemicals Management)
19/2/5/3/F3/17/WL0020/20 (Waste Management)
19/4/4/1/BM1-Cape Lime (Pty) Ltd Kilns (Air Quality Management)

DATE: 08 July 2020

The Board of Directors
Afrimat (Pty) Ltd
P.O. Box 768
BELLVILLE
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For attention: Ms Ntsanko Ndlovu

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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 DEVELOPMENT OF TWO NEW KILNS AND THE CONSTRUCTION OF A HAUL ROAD ON PORTION 0 AND THE REMAINDER OF PORTION 1 OF THE FARM VADERLANDSCHE RIETKUIL NO. 308, PORTION 4 OF THE FARM WELVERDIEND NO. 511, FARM NUWEDRIF NO. 450, PORTIONS 21 AND 26 OF FARM KYS NO. 301, AND PORTION 162 OF THE FARM KAROO VLAKTE NO. 299, VREDENDAL (DMRE REFERENCE: WC 30/5/1/2/2/294MR)

The e-mail correspondence of 16 March 2020 notifying potential interested and affected parties ("I&APs") of the availability of a Background Information Document, the electronic copy of the Draft Scoping Report ("DSR") that was received by the Department on 17 March 2020, and the e-mail correspondences of the environmental assessment practitioner ("EAP") of 15 April 2020, 10 June 2020 and 7 July 2020 regarding the extension of timeframes to submit comments on the DSR, refer.

The e-mail correspondence of the EAP of 10 June 2020 indicated that the deadline for comment on the DSR has been extended to 29 June 2020. Your attention is drawn to Government Notice ("GN") No. 650 of 5 June 2020: Directions regarding measures to address, prevent and combat the spread of COVID-19 relating to National Environmental Management Permits and Licences set out in the Schedule in terms of regulation 4(10) of the Regulations issued in terms of section 27(2) of the Disaster Management Act, 2002 (Act No. 57 of 2002), read together with GN No. R. 439 of 31 March 2020 ("the repealed Directions"). Regulation 4.3 of GN No. 650 of 5 June 2020 states that "*Timeframes or periods extended in terms of the repealed Directions, for any services and actions referred to in the Annexures which were suspended on 27 March 2020 and are now resumed in terms of these Directions, are extended or deemed to be extended by an additional 21 days or such further date as may be determined by the relevant authority.*" As indicated in the e-mail correspondence of 7 July 2020, the EAP has confirmed that an additional 21 days must be added in the calculation of the timeframe for the public participation process ("PPP").

Please find comments from various Directorates within the Department on the DSR and Plan of Study for Environmental Impact Assessment ("EIA") dated March 2020.

1. Directorate: Development Management (Region 1) – Mr Bernard Kgosana (Bernard.Kgosana@westerncape.gov.za; Tel: (021) 483 0753):

1.1. It is noted that more than 20ha of virgin land will be cleared to expand the current limestone mining activities, phasing in the provision of two new kilns and establishing workshops and an office complex. An explanation is absent of how each of the listed activities for which environmental authorisation ("EA") is sought, will be triggered by the proposed development. This Directorate suggests that going forward in the EIA application, the EAP should explain how/why each of the listed activities is triggered, which would assist I&APs in understanding why EA is sought for the identified listed activities.

1.2. This Directorate has noted that some specialist studies will be undertaken for the proposed development. The EAP is advised to consider the "*Procedures for the Assessment and Minimum Criteria for Reporting on identified Environmental Themes in terms of Sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for environmental authorisation*" ("the protocols"), promulgated in GN No. 320 of 20 March 2020, which came into effect on 9 May 2020. With regards to the specialist studies for which no specific protocol has been prescribed, the level of assessment must be based on the findings of the site verification and must comply with Appendix 6 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") EIA Regulations, 2014 (as amended).

2. Directorate: Development Facilitation – Ms Adri La Meyer / Mr Ryan Apolles (Adri.Lameyer@westerncape.gov.za / Ryan.Apolles@westerncape.gov.za; Tel: (021) 483 2887):

2.1. This Directorate advises that the DSR does not meet the minimum requirements of Appendix 2 of the NEMA EIA Regulations, 2014 (as amended). It is noted that the EAP compiled the DSR using the competent authority's *Guideline for the compilation of a Scoping Report with due regard to Consultation with Communities and Interested and Affected Parties*. The EAP is advised that the correct Scoping Report template must be used, which can be downloaded from the URL

<http://www.dmr.gov.za/samrad-online-system>. The Scoping Report Template requires that all the information requirements must be provided, including the following:

- 2.1.1. Details and expertise of the EAP that compiled the DSR, including a curriculum vitae;
- 2.1.2. Description of the application area;
- 2.1.3. The Surveyor General code of each cadastral land parcel;
- 2.1.4. A description and coordinates (with start, middle and end-point coordinates) of the corridor of the proposal haul route;
- 2.1.5. Need and desirability of the proposed activities; and
- 2.1.6. Policy and legislative context.

Please ensure that the Final Scoping Report ("FSR") to be submitted to the competent authority is compiled using the correct template.

- 2.2. In terms of GN No. 960 of 5 July 2019, the submission of a report generated from the National Web Based Environmental Screening Tool ("Screening Tool") is a compulsory requirement when applying for EA in terms of the NEMA EIA Regulations, 2014 (as amended). If not yet undertaken, the EAP is advised to urgently consult the Screening Tool and generate a screening report. Based on the findings of the screening report, the EAP will be required to either appoint specialists to undertake the identified specialist studies, or to provide a motivation in the FSR and Plan of Study for EIA why the specialist studies will not be undertaken or deemed necessary for the EIA process. Should additional specialist studies identified by the Screening Tool be required, these specialist studies must be undertaken and the Plan of Study for EIA must be amended to indicate which additional specialist studies will be undertaken.
- 2.3. The DSR indicates that the applicant currently mines and processes limestone and dolomite on the Remainder of Portion 1 of Farm Vaderlandsche Rietkuil No. 308, Farm Nuwedrif No. 450, Portions 21 and 26 of Farm KYS No. 301, and Portion 162 of the Farm Karoo Vlakte 299, Vredendal ("the Vredendal mine"). The applicant is also in possession of a mining right on the Remainder of Portion 4 of Farm Welverdiend No. 511, Vanrhynsdorp ("the Welverdiend mine"). Per the DSR, the proposed development entails the construction of two new kilns (calciners) and the construction of a haul road between the Welverdiend mine and the Vredendal mine. The construction of the new haul road will entail connecting a new road with two existing roads.
The Draft EIA Report should provide detailed information on the following:
 - 2.3.1. Please indicate on which property/ies of the Vredendal mine the proposed two kilns will be developed (assuming to be on Portion 1 of the Farm Vaderlandsche Rietkuil No. 308 per the layout on Figure 3).
 - 2.3.2. Page 5 of the DSR refers to the construction of a haul road between the Welverdiend mine and Portion 1 of the Farm Vaderlandsche Rietkuil No. 308. Pages 9 and 10 however indicate that Portion 0 of the privately-owned Farm Vaderlandsche Rietkuil No. 308 is proposed for the haul road. Please confirm the affected property for the development of the new haul road.
 - 2.3.3. Information regarding the construction of the new haul road (e.g. type of road proposed (gravel vs. surfaced), whether the existing two roads would require upgrading to accommodate the haulage of 3000-ton material per month, whether any road bypasses would be required for upgrading of the existing two roads, etc.).
 - 2.3.4. The width, length and road reserve of the proposed haul road and dimensions of the existing two roads, should upgrading thereof be required.

- 2.3.5. Whether any associated infrastructure and structures (e.g. bridges, culverts, etc.) will be required for the proposed haul road, especially where it crosses the river. (In this regard, please refer to paragraph 2.4. below.)
- 2.3.6. Development footprints of all the components of the proposed development, which must be superimposed on a site layout plan.
- 2.4. It is noted that the proposed haul road will cross the non-perennial Wiedou River. Photo 4, page 23 of the DSR depicts *"An existing passage through riverine bush in the vicinity of the proposed river crossing for new access road to the Maskam mine."* Statements on page 24 of the DSR refer to *"The proposed access road (8.7 km) to the Maskam mining site passes through mainly Gannabosveld, with a ± 180 m passage through Namaqualand Riviere"* and *"The western part of the proposed access road ... angling down towards the Wiedou River, which is crossed."* The EAP is advised that the applicability of the following listed activities not currently applied for, should be considered and if applicable, the identified listed activities must be applied for via the submission of a Revised Application Form to the competent authority. Where necessary, specialist input may be required to investigate the (direct and cumulative) impacts associated with the listed activities, which must be reported on in the Draft EIA Report.
- 2.4.1. Activity 12 of Listing Notice 1 of the EIA Regulations, 2014 (as amended);
- 2.4.2. Activity 19 of Listing Notice 1 of the EIA Regulations, 2014 (as amended); and
- 2.4.3. Activity 4 and/ or 18 of Listing Notice 3 of the EIA Regulations, 2014 (as amended).
- 2.5. Please further be advised should more than 30m³ but less than 80m³ of dangerous goods on any of the affected properties be stored or handled for the proposed development, then Activity 10 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) would be applicable and must be applied for. If applicable, the location of the dangerous good storage facility must be indicated on the site layout plan.
- 2.6. Page 43 of the DSR states that more than 20ha of indigenous vegetation will be cleared *"for the purposes of mining limestone deposits, erection of existing offices, processing plants and associated office facilities"* (own emphasis). Please provide clarity whether additional mining activities will be undertaken, which would trigger Activity 17 of Listing Notice 2 of the NEMA EIA Regulations, 2014 (as amended).
- 2.7. Page 27 of the DSR indicates that *"None of the vegetation types appear on the current national list of threatened ecosystems (DEA 2011)"*. Page 32 of the DSR however indicates that Activity 12 of Listing Notice 3 of the EIA Regulations, 2014 (as amended) is applied for. The Draft EIA Report must confirm the applicability of said listed activity, i.e. that it will involve the clearance of more than 300m² of indigenous vegetation listed as an endangered or critically endangered ecosystem in terms of the *National List of Ecosystems that are Threatened and in Need of Protection* published in 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).

- 2.8. It is noted that an application for a water use licence ("WUL") has been submitted to the Department of Water and Sanitation in terms of section 21(j) of the National Water Act, 1998 (Act No. 36 of 1998) ("NWA"). Please be advised that the proposed development of the haul road also potentially trigger water use activities in terms of section 21(c) and (i) of the NWA, 1998. Please further be advised that the "One Environmental System" would be applicable to this application, specifically in terms of the synchronisation of the applications in terms of the NEMA and the NWA, 1998. In this regard, please refer to this Department's Circular EADP 0028/2014: One Environmental Management System.
- 2.9. It is recommended that a freshwater ecologist be appointed to assess the potential impacts of the proposed haul road on the affected watercourse and provide suitable avoidance and mitigation measures. This Directorate advises that a Freshwater Impact Assessment would furthermore be required for the section 21(c) and (i) water use authorisation(s). The Plan of Study for EIA should be updated to include the terms of reference ("ToR") for the appointment of a freshwater ecologist. (In this regard, also refer to paragraph 3.8. below.)
- 2.10. It is noted that an application for an atmospheric emission licence ("AEL") will be lodged with the Department of Environmental Affairs, Forestry and Fisheries ("DEFF") after the completion of the EIA process. As per paragraph 2.8. above, the requirements of the One Environmental System would also apply, specifically in terms of the synchronisation of the applications in terms of the NEMA and the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) ("NEMA: AQA"). A decision on an AEL application must be decided at the same time as the decision on the NEMA EIA application.
- 2.11. Pages 20 and 24 of the DSR refer to Appendix 1. Furthermore, section 7.6, page 43 of the DSR refer to the minutes and attendance register of a consultation meeting held on 21 November 2019, attached as Appendix A. Please note that Appendix 1 and Appendix A were not included in the DSR received via e-mail correspondence.
- 2.12. The DSR fails to provide a description of the alternatives of the proposed activities that have been considered by the applicant. The EAP is reminded of the requirements of regulation 2(1) of Appendix 2 of the NEMA EIA Regulations, 2014 (as amended), which requires that a scoping report must contain the information that is necessary for a proper understanding of the process, informing all preferred alternatives. This includes, *inter alia*, a description of alternatives considered for the proposed access road, technology alternatives considered for the proposed lime kilns, etc.
- 2.13. Page 12 of the DSR states that the Kleinrivier Primary School is situated approximately 550m west of the processing plants. Figure 3 (surrounding land uses map) indicates the location of the "*fluid bed calciner site*" directly adjacent to the primary school. Will the Air Quality Impact Assessment provide an assessment of potential air quality and noise impacts to the sensitive receptors, and have alternative locations for the proposed lime kilns been considered?
- 2.14. The findings of the externally appointed review EAP must be included with the submission of any reports to the competent authority. In this regard, the EAP is referred to regulation 13(2) of the NEMA EIA Regulations, 2014 (as amended), which requires the appointment of an independent EAP prior to undertaking the PPP.

3. Directorate: Pollution and Chemicals Management – Mr Hassan Parker (Hassan.Parker@westerncape.gov.za; Tel: (021) 483 6877):

- 3.1. It is noted that the only operational borehole remaining (of the three drilled), is utilised for on-site dust suppression purposes, and that dust suppression measures “*will also be implemented on the Welverdiend road to prevent excessive dust.*” Does this imply that the operational borehole will also be utilised for dust suppression purposes on the Welverdiend road, or will further alternatives be investigated in this regard? Additional information is required. Please further note that the use of potable water for dust suppression is not supported and should be avoided.
- 3.2. This Directorate notes and supports the proposed Geohydrology Impact Assessment. It is recommended that measurements for the groundwater table be conducted during the rainy season when the highest water table is anticipated.
- 3.3. The DSR indicates that water is abstracted from the limestone mining area only when it rises above a “*certain point*” which makes mining unsafe, and thereafter discharged downgradient into a valley, feeding into the Wiedou River system, and eventually the Olifants River. Kindly provide a description regarding the indicator referred to as a “*certain point*”.
- 3.4. Furthermore, it is recommended that the proposed Monitoring Programme emanating from the Geohydrology Impact Assessment, consider and investigate potential adverse impacts to ground – and surface water due to the abstraction and discharge of water from the limestone mining area. Alternatively, if measures are already in place to mitigate potential impacts associated with discharge, kindly provide a description thereof. In addition, it is requested that more information on this practice and the “*valley*” and “*discharge point*” referred to, are identified on a map and included in the Draft EIA Report.
- 3.5. The DSR indicates that the Wiedou and Troe Troe Rivers which traverse the property, are seasonal; however, potential adverse impacts should still be assessed in terms of river crossings for the proposed new access and haulage road. Furthermore, it is noted that the properties are not relatively “*flat*” as indicated on page 16, but that the overall topography is gently undulating, as depicted in the maps and photographs, with the relatively steep gradients down to the river beds, as correctly noted on page 16. These gradients are particularly relevant when considering potential impacts associated with runoff, pollution, and contamination risks emanating from the haulage road, dewatering of the mining area, and operational mining activities.
- 3.6. Further detail is required on the location of the proposed new kilns (at a finer scale than that provided in the DSR). It is noted that the potential for suspended solids from raw material preparation, storage and handling, can be considered a water pollutant, and management measures should be in place to prevent such impacts. This would also include storm water management for the area housing the kilns and material storage areas. Considering this, it is recommended that the Environmental Management Programme (“EMPr”) compiled for the environmental impact reporting (“EIR”) phase include detail with respect to good housekeeping and storm water management.

- 3.7. Further to the above, page 36 of the DSR states the following: *"Surface water – Removing and discharging of groundwater from the mine pit into a surface body (river) increases the risk of introducing contaminants into the surface water body, should vehicle and equipment break downs and leaks occur close to the dewatering pit. Cleaning of vehicle equipment near the river will result in surface water contamination."* Please note that there should be no cleaning of equipment near any river or tributary, irrespective of whether the watercourse is seasonal. It is essential that contingencies in the case of breakdowns or leaks close to the dewatering pit are incorporated into the EMP, and that mitigation measures are recommended to adequately manage and maintain equipment and materials.
- 3.8. According to the identified specialist studies included in the Plan of Study for EIA, a Biodiversity Impact Assessment is proposed, with emphasis on botanical aspects. However, despite the identification of sensitive receiving environments within the proposed site that will be directly affected by the proposal, the presence of watercourses, tributaries and riparian habitats, in combination with areas mapped as Ecological Support Areas and Critical Biodiversity Areas, it is noted that an assessment of freshwater and riparian environments have not been included within the ToR for the Biodiversity Impact Assessment. Given the potential impacts on these sensitive watercourses, most notably the proposed river crossings of the haulage roads and dewatering of the mine site, it is recommended that the ToR for the Biodiversity Impact Assessment be broadened to incorporate an assessment of the biophysical environment, including the watercourses; or alternatively, that a freshwater specialist provide input to the EIR phase of the application.
4. Directorate: Waste Management – Ms Hadjira Peck (Hadjira.Peck@westerncape.gov.za; Tel: (021) 483 3003):
- 4.1. Please include the applicability of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) and any applicable subordinate legislation when updating/including the policy and legislative context in the FSR.
- 4.2. Please update the section on socio-economic by utilising the most recent figures and statistics as opposed to 2013 statistics that were cited in the DSR. The Draft EIA Report should include reference to the most recent Municipal Economic Review and Outlook Report and the most recently approved Integrated Development Plans and Spatial Development Frameworks of Matzikama Municipality and West Coast District Municipality.
- 4.3. Waste management impacts (both during the construction and operational phases) must be included in the list of potential impacts (section 4.8 of the DSR).

5. Directorate: Air Quality Management – Mr Deon Stoltz / Mr Peter Harmse (Deon/Stoltz@westerncape.gov.za / Peter.Harmse@westerncape.gov.za; Tel: (021) 483 4383):
- 5.1 The DSR indicates that the application for an AEL will be submitted to the DEFF as the proposed lime kilns trigger the specified activity in subcategory 5.6: Lime Production identified in GN No. 893 of 22 November 2013 (as amended): *Listed Activities and Associated Minimum Emission Standards identified in terms of section 21 of the NEM: AQA, 2004*. 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. Proof of the placing of the newspaper advertisements must be included in the Draft EIA Report.
6. Please direct any enquiries to the official/s indicated in this correspondence should you require any clarity on any of the comments provided.
7. 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



water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

WESTERN CAPE PROVINCE

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Attention: Ms Ntsanko Ndlovu

DRAFT SCOPING REPORT FOR THE PROPOSED UPGRADE OF ENVIRONMENTAL MANAGEMENT PROGRAMME WITH RESPECT TO MINING ACTIVITIES OF PORTIONS 0 AND 1 OF THE FARM VADERLANDSCHE RIETKUIL 308, REMAINDER OF FARM NUWEDRIF 450, REMAINDER OF FARM 510 AND PORTION 40 OF FARM 301, SITUATED IN THE MAGISTERIAL DISTRICT OF VREDENDAL, WESTERN CAPE REGION

Your submission dated 10 March 2020 with DMR reference number WC 30/5/1/2/2/294 MR has reference. This office would like to comment on the document based on the evaluation of the impact of the proposed activity on water resources.

1. Afrimat abstract water from the limestone mining area. This activity triggers Section 21 (j) of the National Water Act, 1998 (Act 36 of 1998) which is *removing, discharging or disposing of water found underground if it is necessary for the efficient continuation of an activity or for the safety of people*. It has been noted that a Water Use License Application was submitted to this Department in this regard.
2. A stormwater management plan that will address the impacts of storm water on both surface and groundwater resources must be put in place.
3. No pollution of the Troe-Troe and Wiedou Rivers or any surface water or groundwater resources may occur due to the proposed activity. Should there be any pollution on the water resources, this Department must be notified immediately.
4. All the requirements of the National Water Act, 1998 (Act 36 of 1998) regarding water use and pollution management must be adhered to at all times.
5. These comments do not exempt you from complying with other relevant legislations and requirements of other governmental Departments.
6. Please note that this Department reserves the right to amend and/or add to the comments made above in the light of subsequent information received.



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water & sanitation

Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

For any further queries/ correspondence in this regard, please do not hesitate to contact the above official.

Your co-operation aimed at the protection of water resources will be highly appreciated.

Kind Regards

CHIEF DIRECTOR: WESTERN CAPE

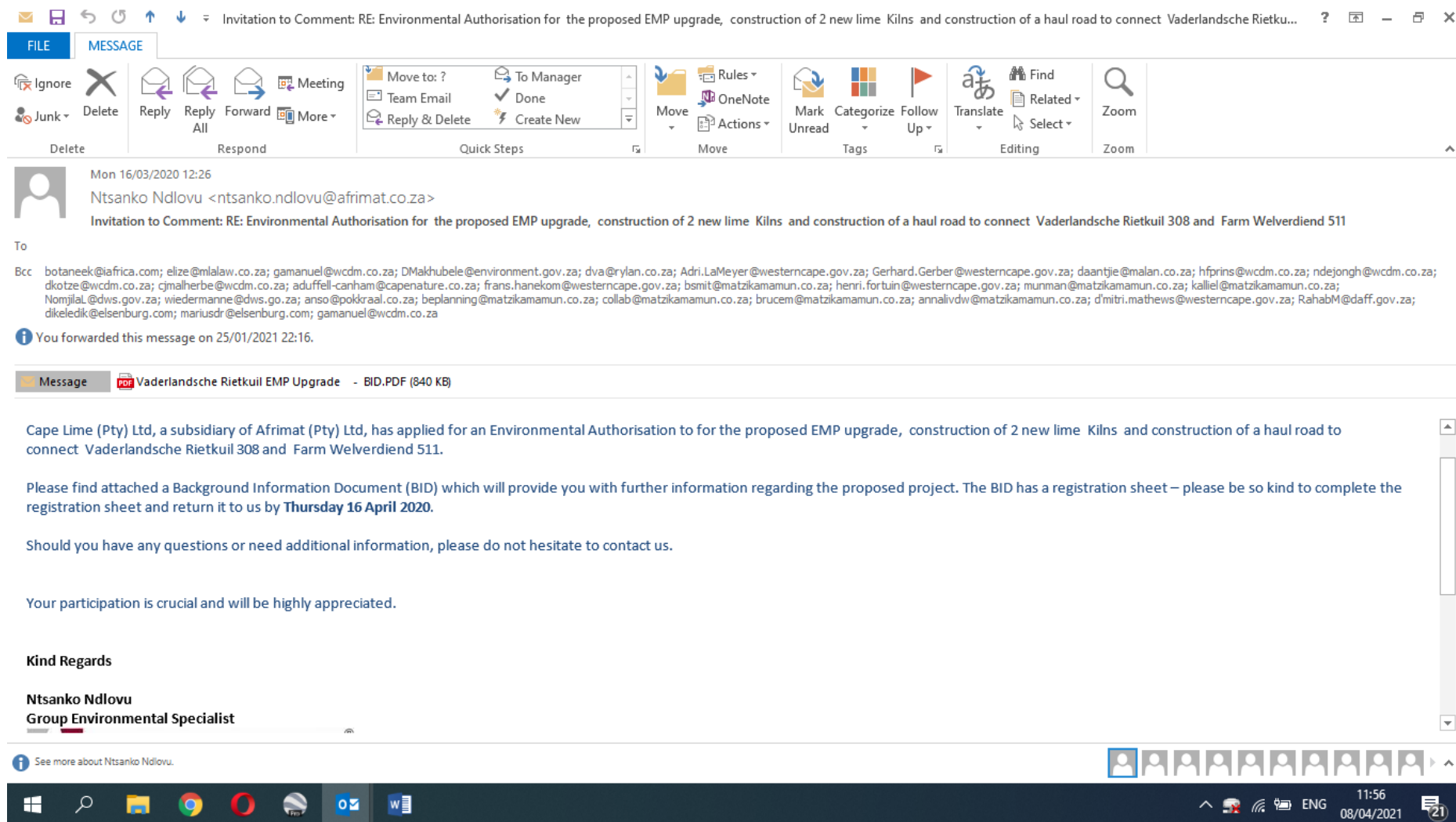
DATE: 15 April 2020

Letter signed by: Ms Thembisa Torch

Designation: Deputy Director (Acting): Berg-Olifants Water Management Area



NATIONAL DEVELOPMENT PLAN
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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.: 13/2/12/2/1
15/2/3/5/2



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26 May 2020

ATTENTION: NTSANKO NDLOVU
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Afrimat
PO Box 768
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7535

Sir/Madam

**DRAFT SCOPING REPORT: CONSTRUCTION OF LIME KILNS, ACCESS
ROAD AND UPGRADE OF EMPr, PORTIONS OF FARMS 301, 308, 450 AND
510, VANRHYNSDORP**

1. Your letter dated 10 March 2020 and the Draft Scoping Report for the proposal refer.
2. The Environmental Integrity Section of the West Coast District Municipality has the following comments on the DSR:
 - 2.1 Knersvlakte Dolomite Vygieveld has a very limited distribution range and are mostly threatened by mining activities and road construction. Any loss of designated CBA's must be avoided. A search and rescue plan and activity must be compiled and executed to remove and recover any plants and animals before road construction commences. This should be done in partnership with CapeNature.
 - 2.2 New and existing roads and maintenance/improvements thereof, including dust suppression measures, need to be done by the mining company [Cape Lime (Pty) Ltd].
 - 2.3 The necessary water use licence must be obtained from the Department of Water and Sanitation for the legal extraction, discharging or disposing of both surface and groundwater.

3. The Air Quality Officer of the West Coast District Municipality provided the following comments on the report:

- 3.1 The construction of two lime kilns in addition to the existing kiln which has been in operation since 2004 necessitates an air quality licence being issued by the WCDM Air Quality Section. Application for the construction of the additional kilns should therefore be lodged with the WCDM's Air Quality Officer.
- 3.2 Various complaints received over the years from surrounding vineyard owners regarding the impact of the Cape Lime operations on the agricultural sector in the immediate vicinity begs the question whether additions to the existing facility will exacerbate this situation. More information should be provided in this regard.
- 3.3 Possible contamination of groundwater from the coal stockpiled for the kilns, as referenced in the DSR, must be investigated based on best practices to prevent such occurrence. An action plan and findings must be submitted to the WCDM Air Quality Officer.
- 3.4 Best practices must be included in the Environmental Management Plan to manage all potential sources of pollution during the construction and processing phases in order to prevent any negative impacts on the surrounding environment. Dust management and monitoring must be done in accordance with the National Dust Control Regulations (No 827 of 1 November 2013 as amended).
- 3.5 Copies of the following must be submitted to the WCDM Air Quality Officer for comment:
 - 3.5.1 Comments and Responses Report as well as the Final Scoping Report.
 - 3.5.2 Air Quality Impact Assessment report conducted by Lethabo Air Quality Specialists (Pty) Ltd.
 - 3.5.3 Granted Environmental Authorisation.
- 3.6 It is recommended that Ambient Air Modelling Specialist Studies be included in the list of studies mentioned under item 8.1 in the DSR. Once completed, the report must be submitted to the Air Quality Officer for comments.

- 3.7 An updated fugitive dust management plan, containing dust preventative measures and control in respect of nearby land owners and agricultural activity during construction, production and abnormal conditions, must be submitted to the Air Quality Officer. The plan must be adapted to accommodate the existing operations as well as all proposed upgrades.
- 3.8 The potential cumulative impact description mentions that vehicular movement on and off site contributes to traffic, dust generation on unpaved roads and product spillage. Detail on how these impacts will be managed must be included in the above mentioned plan.
- 3.9 Dust mitigation measures must be implemented and maintained at all times and in all areas where dust could be generated in order to prevent negative impacts on the surrounding environment.
4. The necessary land use and building plan approval must be obtained from Matzikama Municipality. No construction may commence prior to said approvals being issued.

Yours faithfully



MR D JOUBERT
MUNICIPAL MANAGER
/dk

01 Goldengroove
Cnr Oosthuizen and Leipoldt
Germiston
1401
08 April 2021

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

PROPOSED UPGRADE OF ENVIRONMENTAL MANAGEMENT PROGRAMME WITH RESPECT TO MINING ACTIVITIES OF PORTIONS 0 AND 1 OF THE FARM VADERLANDSCHE RIETKUIL 308, REMAINDER OF FARM NUWEDRIF 450, REMAINDER OF FARM 510, AND PORTION 40 OF FARM 301, SITUATED IN THE MAGISTERIAL DISTRICT OF VREDENDAL, WESTERN CAPE REGION.

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 including specialist studies, the following comments are submitted:

- In terms of public participation, considerations must be given to the directive published by the minister of environmental affairs and Provincial protocols regarding the COVID 19. These include public meetings and measures to reach relevant stakeholders.
- The issue raised by the public regarding the noise pollution with respect to the nearby school needs to be responded to and referenced in the study conducted.
- The report identified and assessed impacts resulting from the new road for hauling. In addition, a clear reference to the two kilns should be structured and given attention equally.
- The 100 meter buffer away from the water course is good as a minimum and the possibility exist to accommodate possible cumulative impacts, that option to extend the buffer should still be explored.

It is noted that this is the Draft Scoping Report and further reviews will be necessary after the competent authority has issued comments and feedback regarding the application.

Reg: 2017/053891/07; Adress: 01 Goldengroove, Cnr Oosthuizen and Leiphodt, Germiston

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

Yours sincerely

Victor Manavhela

Principal Specialist-Environmental Management

Email: info@biogeotech.co.za



Date: 08 April 2021