

**BOETEKA DOLERIET
(PTY) LTD**

**PROPOSED AGGREGATE / GRAVEL MINE ON A PORTION OF
PORTION 4 OF THE FARM WAAI KRAAL 120, REGISTRATION
DIVISION OF BEAUFORT WEST, WESTERN CAPE PROVINCE**

COMMENTS AND RESPONSE REPORT

DEPARTMENT REFERENCE NUMBER:

WC 30/5/1/3/2/10386 MP

MAY 2026



NOTIFICATION OF APPLICATION TO STAKEHOLDERS AND I&APS DURING PUBLIC PARTICIPATION PERIOD

COMMENTING PERIOD: 13 APRIL 2026 – 15 MAY 2026

Boeteka Doleriet (Pty) Ltd, applied for environmental authorisation (EA) and a mining permit to mine aggregate / gravel over an area that has been partially disturbed by adjacent mining activities, on a portion of Portion 4 of the farm Waai Kraal 120, Registration Division of Beaufort West, Western Cape province. During the public participation process the stakeholders and I&AP's were informed of the project by means of Draft Basic Assessment Report Notices that were sent to the contact persons via email. A 30-day commenting period was allowed which ended on 15 May 2026. The following table provides a list of the I&AP's and stakeholders that were informed of the project:

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Penxa	Central Karoo District Municipality	13 April 2026	No Response Received
Mr A.C. Makendlana (Acting Municipal Manager)	Beaufort West Local Municipality	13 April 2026	No Response Received
CLlr J De Kock Reynolds	Beaufort West Local Municipality Ward 2	13 April 2026	No Response Received

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Me Waseefa Dhansay	Heritage Western Cape	13 April 2026	No Response Received
Me Alana Duffell-Canham	CapeNature	13 April 2026	No Response Received
Me Megan Simons	CapeNature - George	13 April 2026	24 April 2026

Comments received from Me Simons on 24 April 2026:

CapeNature would like to thank you for the opportunity to review the above report. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application. CapeNature wishes to make the following comments:

According to the Western Cape Biodiversity Spatial Plan (CapeNature 2024), the property has Ecological Support Areas (ESA 1: Aquatic) and Other Natural Areas. According to the South African Vegetation Map (Beta VegMap, 2024), the vegetation units in the area are Gamka Karoo, Southern Karoo Riviere, and Upper Karoo Hardeveld, which are all listed as Least Concern (SANBI 2022). The property contains several non-perennial drainage lines, which align with the mapped Ecological Support Areas (ESAs), including one located to the west of the proposed mining footprint. CapeNature has reviewed the application and provides the following comments and recommendations:

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<p>The mining footprint is situated within a mapped Natural Aquatic ESA. These areas are essential for maintaining ecological functioning, hydrological processes, and biodiversity targets.</p> <p>Although no watercourses occur directly within the proposed mining footprint, the presence of nearby non-perennial drainage lines is noted. Appropriate buffer zones should be delineated and maintained around all drainage features, including non-perennial systems.</p> <p>The dBAR indicates that a Water Use Licence in terms of the National Water Act (NWA) is not required. However, given the proximity of non-perennial drainage features, CapeNature recommends that written confirmation be obtained from the Breede-Olifants Catchment Management Agency (BOCMA) to verify this position.</p> <p>The statement that faunal species will not be impacted as they can move away from the site is not supported. Mining-related activities, including blasting, noise, dust generation, and increased human presence, are likely to result in disturbance, displacement, and potential mortality of less mobile species such as reptiles and small mammals. This approach does not align with the precautionary principle as outlined in NEMA, which requires a risk-averse and cautious approach where impacts are uncertain. Mitigation measures should therefore be strengthened to address:</p> <ul style="list-style-type: none"> 4.1 Blasting impacts (noise and vibration) 4.2 Dust suppression 4.3 Faunal rescue and relocation protocols 			

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<p>4.4 Ongoing monitoring of faunal activity</p> <p>Karoo ecosystems recover slowly, and once disturbed, restoration to a functional ecological state is uncertain. It should be noted that once arid habitats are disturbed, it could take years to rehabilitate, even from temporary disturbances. CapeNature only considers a habitat to be rehabilitated once a comparable level of ecosystem functionality has been proven.</p> <p>The proposed rehabilitation measures must demonstrate measurable outcomes. CapeNature recommends that the EMPr include clear and measurable rehabilitation success criteria aligned with pre-disturbance conditions; use of locally indigenous species; and consideration of active restoration interventions where necessary.</p> <p>The proposed mining activity represents a change from the likely agricultural zoning of the property. The applicant/EAP must confirm whether the activity is consistent with the applicable municipal zoning scheme and SDF, or whether a land use application is required in terms of the Spatial Planning and Land Use Management Act, supported by input from the relevant local authority.</p> <p>The broader Beaufort West area is subject to increasing development pressure, including mining and renewable energy developments. The potential cumulative impacts on biodiversity, ecological processes, and landscape connectivity have not been sufficiently assessed. Cumulative impacts must be considered holistically, taking into account existing and reasonably foreseeable developments in the area.</p> <p>CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>			

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<p><u>Greenmined Environmental's Response on 05 May 2026:</u></p> <p>Dear Madam</p> <p>RE: COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT WITH RESPECT TO THE MINING PERMIT APPLICATION ON A PORTION OF PORTION 4 OF THE FARM WAAI KRAAL 120, REGISTRATION DIVISION OF BEAUFORT WEST, WESTERN CAPE PROVINCE (DMPR REF: WC 30/5/1/3/2/10386 MP).</p> <p>The above matter as well as letter received from you dated 24 April 2026 refers. Please see responses to your comments listed below:</p> <ol style="list-style-type: none"> The mining footprint is situated within a mapped Natural Aquatic ESA. These areas are essential for maintaining ecological functioning, hydrological processes, and biodiversity targets. <ul style="list-style-type: none"> The Draft Basic Assessment Report acknowledges that the broader study area includes aquatic features; however, the proposed mining footprint itself is located on an already partially disturbed area (approximately 60–70% disturbed), characterised by low ecological sensitivity, low agricultural potential, and situated more than 100 metres from any watercourse. Based on the Cape Farm Mapper, and the Biodiversity Geographic Information System (BGIS: 2017 Western Cape Biodiversity Spatial Plan), the site is classified as an “Other Natural Area” and not over a mapped Ecological Support Area. Furthermore, the Department of Forestry, Fisheries and the Environment (DFFE) Screening Tool indicates that the site has low terrestrial biodiversity sensitivity. Collectively, these classifications reflect moderate biodiversity importance with low regional significance. In this regard, it is noted that CapeNature’s comment states that the mining footprint falls within a mapped Ecological 			

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<p>Support Area (Ecological Support Area 1: Aquatic). However, this is inconsistent with the spatial tools and datasets referenced above. The applicant therefore respectfully requests that CapeNature clarify the specific dataset, version, or spatial delineation used to support the assertion that the proposed mining footprint falls within an Ecological Support Area.</p> <ul style="list-style-type: none"> ■ Notwithstanding the above, the impact on ecological functioning is considered to be low and localised, provided that the mitigation measures outlined in the Environmental Management Programme are implemented. The development footprint has been deliberately selected to avoid higher sensitivity areas and to utilise previously disturbed land, thereby aligning with biodiversity conservation principles. <p>2. Although no watercourses occur directly within the proposed mining footprint, the presence of nearby non-perennial drainage lines is noted. Appropriate buffer zones should be delineated and maintained around all drainage features, including non-perennial systems.</p> <p>3. The dBAR indicates that a Water Use Licence in terms of the National Water Act (NWA) is not required. However, given the proximity of non-perennial drainage features, CapeNature recommends that written confirmation be obtained from the Breede-Olifants Catchment Management Agency (BOCMA) to verify this position.</p> <ul style="list-style-type: none"> ■ The presence of non-perennial drainage lines in the broader area is acknowledged. However, based on site-specific measurements, the nearest non-perennial drainage line is located approximately 341.22 m from the proposed mining footprint (please see figure below). This distance exceeds the 100 m regulatory threshold associated with Section 21(c) 			

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and (i) water uses in terms of the National Water Act, and therefore the proposed activity does not trigger a Water Use Licence Application (WULA). All mining-related activities will be strictly confined within the demarcated footprint, with no encroachment into surrounding drainage features. Standard environmental management measures included in the EMPr will ensure that indirect impacts are avoided and that the integrity of nearby drainage features is maintained. Written confirmation from the Breede-Olifants Catchment Management Agency will be obtained to verify this position.







Figure 1: The distance between the proposed mining area and non-perennial drainage line.

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<p>4. The statement that faunal species will not be impacted as they can move away from the site is not supported. Mining-related activities, including blasting, noise, dust generation, and increased human presence, are likely to result in disturbance, displacement, and potential mortality of less mobile species such as reptiles and small mammals. This approach does not align with the precautionary principle as outlined in NEMA, which requires a risk-averse and cautious approach where impacts are uncertain. Mitigation measures should therefore be strengthened to address:</p> <p>4.1 Blasting impacts (noise and vibration);</p> <p>4.2 Dust suppression;</p> <p>4.3 Faunal rescue and relocation protocols; and</p> <p>4.4 Ongoing monitoring of faunal activity.</p> <ul style="list-style-type: none"> ▾ The DBAR acknowledges the presence of small mammals and reptiles on site, although initial impacts were considered low due to species mobility. In response to the comment, mitigation measures will be strengthened in the EMPr to adopt a precautionary approach. This will include: <ul style="list-style-type: none"> ○ Blasting impacts: Controlled blasting schedules and minimisation of vibration. ○ Dust suppression: Use of water and operational controls (speed limits, covering loads). ○ Faunal rescue: Pre-clearing inspections and relocation of slow-moving species. ○ Monitoring: Ongoing environmental monitoring. 			

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<p> <ul style="list-style-type: none"> ▀ These measures ensure alignment with the precautionary principle as outlined in NEMA. </p> <p>5. Karoo ecosystems recover slowly, and once destructed, restoration to functional ecological state is uncertain. It should be noted that once arid habitats are disturbed, it could take years to rehabilitate, even from temporary disturbances. CapeNature only considers a habitat to be rehabilitated until a comparable level of ecosystem functionality has been proven.</p> <p> <ul style="list-style-type: none"> ▀ The DBAR recognises that rehabilitation in arid Karoo environments is slow and that full ecological recovery is uncertain. Rehabilitation has therefore been designed to be progressive throughout the operational phase and focused on achieving a stable, non-polluting landform that is compatible with the surrounding environment and suitable for continued land use. It is acknowledged that restoration to pre-disturbance conditions may take extended periods, and rehabilitation success will be assessed based on functional ecosystem stability rather than immediate equivalence. </p> <p>6. The proposed rehabilitation measures must demonstrate measurable outcomes. CapeNature recommends that the EMPr include clear and measurable rehabilitation success criteria aligned with pre-disturbance conditions; use of locally indigenous species; and consideration of active restoration interventions where necessary.</p> <p> <ul style="list-style-type: none"> ▀ The DBAR acknowledges that Karoo ecosystems recover slowly and that full restoration to pre-disturbance conditions is uncertain. Rehabilitation will therefore be progressive and aimed at achieving a stable, functional landform compatible with the surrounding environment. The EMPr will be strengthened to include clear, measurable rehabilitation criteria, the use of locally indigenous species, and active restoration where necessary, with success assessed based on long-term </p>			

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<p>ecosystem functionality.</p> <p>7. The proposed mining activity represents a change from the likely agricultural zoning of the property. The applicant/EAP must confirm whether the activity is consistent with the applicable municipal zoning scheme and SDF, or whether a land use application is required in terms of the Spatial Planning and Land Use Management Act, supported by input from the relevant local authority.</p> <ul style="list-style-type: none"> ■ The proposed mining activity is considered to be consistent with the applicable municipal planning framework. The Beaufort West Municipality has previously granted consent use approval for quarrying on the Remainder of Portion 4 (Portion of Portion 1) of Farm 120, Waaikraal, which relates to the existing adjacent mining operation on the same property. ■ As the current application area forms part of the same property and is directly associated with the existing quarry operations, the existing consent use approval is regarded as applicable to the proposed activity. This indicates that quarrying is a permissible land use on the property in terms of the Municipal Land Use Planning By-law. Notwithstanding the above, formal confirmation will be obtained from the Beaufort West Municipality prior to the commencement of mining activities to verify that the proposed expansion is fully compliant with the applicable zoning scheme and land use requirements. <p>8. The broader Beaufort West area is subject to increasing development pressure, including mining and renewable energy developments. The potential cumulative impacts on biodiversity, ecological processes, and landscape connectivity have not</p>			

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<p>been sufficiently assessed. Cumulative impacts must be considered holistically, considering existing and reasonably foreseeable developments in the area.</p> <ul style="list-style-type: none"> ▾ The DBAR considers cumulative impacts in the context of existing adjacent mining activities and concludes that, due to the relatively small footprint of the proposed development, cumulative impacts are expected to be low at a regional scale. Potential cumulative impacts include increased dust, noise, and traffic, as well as incremental loss of natural land. With the implementation of mitigation measures, these impacts are considered to be of low significance. Notwithstanding this, the cumulative impact assessment will be expanded in the Final Basic Assessment Report to more explicitly consider existing and reasonably foreseeable developments in the Beaufort West area and their combined effects on biodiversity, ecological processes, and landscape connectivity. <p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments received for you as well as our response will be incorporated in the Final Basic Assessment Report to be submitted to DMPR for their consideration.</p> <p>We trust you will find this in order. Please do not hesitate to contact us in the event of any uncertainties.</p>			
<p>Mr Cor van der Walt</p> <p>Me Phyllis Pienaar</p>	<p>Department of Agriculture</p> <ul style="list-style-type: none"> ▾ Western Cape ▾ Beaufort West 	<p>13 April 2026</p>	<p>No Response Received</p>

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Mr Feroza Albertus Mr Seoka Lekota	Department of Forestry, Fisheries & the Environment <ul style="list-style-type: none">  Western Cape  Biodiversity & Conservation Department - Pretoria 	13 April 2026	No Response Received
Mr M Murovhi Mr S Ross	Department of Water and Sanitation <ul style="list-style-type: none">  Western Cape  Gqeberha 	13 April 2026	No Response Received
Mr S Fourie	Department of Economic Development and Tourism	13 April 2026	No Response Received
Me Adri La Meyer	Department of Environmental Affairs and Development Planning - Western Cape	13 April 2026	No Response Received
Mr Danie Swanepoel	Department of Environmental Affairs and Development Planning - George	13 April 2026	No Response Received
Dr Robert Macdonald	Department of Social Development	13 April 2026	No Response Received

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Mrs W Adams	Department of Social Development - Beaufort West	13 April 2026	No Response Received
Me V Stoffels	Department of Transport and Public Works	13 April 2026	No Response Received
Me Candice van Heerden	Department of Labour	13 April 2026	No Response Received
Mr L Mbekeni	Department of Rural Development and Land Reform	13 April 2026	No Response Received
Me Nicole Abrahams	SANRAL Western Cape	13 April 2026	No Response Received
Mr Jannie van Staden	Breede-Gouritz Cathement Management Agency	13 April 2026	No Response Received
SAHRIS	South African Heritage Resource Authority	13 April 2026	No Response Received

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Mr Gideon Viviers – Land Owner	Waai Kraal No 120 Portion 4 Surrounding landowner of: Riet Fontein No 122 Portion 2 & 9 Rhenosterkop 155 Portion 4 (RE)	13 April 2026	No Response Received
Me N Abrahams – SANRAL Representative	Waai Kraal 120 Portion 6	13 April 2026	No Response Received
Me Esme Koster	Werner Koster Trust Rhenosterkop No 155 Portion 2 & 3 (RE) Waai Kraal 120 Portion 1 (RE)	13 April 2026	No Response Received
Mr Boel Smuts	Tamarisk Trust Rietfontein No 122 Portion 5 Farm 71 (RE) Farm Welgevonden 69 (RE)	13 April 2026	No Response Received
Mr Micheal Anstey	Courlandskloof	13 April 2026	No Response Received
Mr Rhalf Koster (Tenant)	Courlandskloof	13 April 2026	No Response Received

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Wallie Nigrini	Renosterkop	13 April 2026	15 May 2026

Comments received from Mr Nigrini on 15 May 2026:

We write to you on instructions of Mr A D Nigrini of the farm Rhenosterkop which is situate approximately 4 kilometres from the applicant's proposed site.

The house of our client is built on the same granite ridge which apparently has previously been pointed out by geologists.

During the applicant's previous operations our client's house developed some cracks which was caused directly as result of the blasting that took place.

Our client is also worried that some boreholes may be affected by the blasting.

Our client therefore objects to the granting of the mining permit unless his property is safeguarded against any structural damage which includes the operation of his current boreholes.

Please acknowledge receipt and confirm that the objection raised will be disclosed to the relevant authority.

Greenmined Environmental' s Response on 19 May 2026:

The objection raised on 15 May 2026 via email by Mr A.D. Nigrini is acknowledged and will be included in the documentation submitted to the relevant competent authority for consideration as part of the application process.

It is noted that concerns have been raised regarding alleged structural damage and potential impacts on boreholes associated with previous blasting activities undertaken by former operators or contractors. As this application relates to a new proposed operation,

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<p>the Applicant is not in a position to comment on or verify activities previously undertaken by other contractors.</p> <p>For the proposed operations forming part of this application, it can however be confirmed that any blasting activities will be limited and undertaken strictly in accordance with applicable legal requirements, prescribed blasting specifications, and recognised industry best practices. Appropriate mitigation and control measures will be implemented to minimise potential vibration and associated impacts.</p> <p>The Applicant remains committed to conducting operations responsibly and in compliance with all conditions that may be imposed by the relevant authority.</p>			
Mr Sias Reynolds	Avondale & The Meadows	13 April 2026	No Response Received
Mr & Mrs Birkner	Badshoek Farm Beaufort West Rd 443 Portion 0	13 April 2026	No Response Received
Mr J Marais	Rhenosterkop Quarry	13 April 2026	14 May 2026
<p><u>Comments received from Mr Marais on 14 May 2026</u></p> <p>MINING APPLICATION: BOETEKA DOLERIET (PTY) LTD: REFERENCE NUMBER WC 30/5/1/2/2/10386 MP</p> <p>We refer to your notice dated 09 April 2026 which calls for objections against the proposed mining permit on portion 4 of the farm Waaikraal 120, Beaufort West.</p>			

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<p>This application cannot be viewed in isolation and must be seen against the historical backdrop of the previous mining activities on farm Waaikraal 120, by Lombardskraal Doleriet (PTY) Ltd.</p> <p>Clarity is needed on the new application and the existing permit that is in place, especially regarding old and new permit boundary areas and rehabilitation that must be done on the old quarry.</p> <p>Further to the above, clarity is needed on:</p> <ul style="list-style-type: none"> • Landowner's Consent. • Water Source for Dust Suppression. <p>1. New and Existing Permit Boundaries</p> <p>In the DBAR it is stated that the new permit area is partially disturbed by adjacent mining activities.</p> <p>Lombardskraal Doleriet (PTY) Ltd lies in an L shape facing North and turning towards the gravel road in the East.</p> <p>From your provided Google earth photos and other information, it is quite clear that Lombardskraal Doleriet (PTY) Ltd operated outside its permitted boundaries, with several hectares affected.</p> <p>The new application (Boeteka Doleriet (PTY) Ltd) permit boundaries reach into this already disturbed area. The questions that arise are:</p> <ul style="list-style-type: none"> • How/ when will rehabilitation be done to the old, permitted area, as well as to the affected, non-permitted areas • Have the Department of Minerals and Energy been notified of these permit violations, as the new permit application partially falls within the said area and is an agreement in place to remedy the above? 			

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2.	Landowner consent		<p>In your supporting documents to the DBAR you attached a letter by Crawfords Attorneys referring to Lombardskraal Doleriet (PTY) Ltd that exercised their option to renew the land use agreement with the landowner for a further 5 years.</p> <p>It is noteworthy to place on record that this letter refers to Lombardskraal Doleriet (PTY) Ltd for the renewal of the land use, and not Boeteka Doleriet (PTY) Ltd.</p> <p>The letter by Crawfords attorneys refers to rights that Lombardskraal Doleriet (PTY) Ltd might have or not have, but no reference to Boeteka Doleriet (PTY) Ltd, so no legal grounds was established for permission granted to the new permit application.</p> <p>3. Dust Suppression / Water Use</p> <p>It is noted that applicant will use between 5000 and 10 000 liters of water per day for dust suppression in summer times.</p> <p>We note the following:</p> <ul style="list-style-type: none"> No mention is made about the water source. Is it a registered water source, and is there an agreement in place? <p>Summary</p> <ul style="list-style-type: none"> We as permit holders are kept to stringent Environmental Management rules, and this should apply to all stake holders. Responsible mining, as directed by the Department of Minerals and Energy, should apply to all permit holders. Can new applications be launched in areas where permitted legislation has been violated?

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<ul style="list-style-type: none"> Both the current permit holder (Lombardskraal Doleriet PTY Ltd) and the new applicant (Boeteka Doleriet PTY Ltd) are owned by the same family. <p><u>Greenmined Environmental' s Response on 19 May 2026:</u></p> <p>RE: COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT WITH RESPECT TO THE MINING PERMIT APPLICATION ON A PORTION OF PORTION 4 OF THE FARM WAAI KRAAL 120, REGISTRATION DIVISION OF BEAUFORT WEST, WESTERN CAPE PROVINCE (DMPR REF: WC 30/5/1/3/2/10386 MP).</p> <p>The above matter as well as the letter received from you dated 14 May 2026 refers. Please see responses to your comments listed below:</p> <ol style="list-style-type: none"> New and Existing Permit Boundaries <p>In the DBAR it is stated that the new permit area is partially disturbed by adjacent mining activities.</p> <p>Lombardskraal Doleriet (PTY) Ltd lies in an L shape facing North and turning towards the gravel road in the East.</p> <p>From your provided Google earth photos and other information, it is quite clear that Lombardskraal Doleriet (PTY) Ltd operated outside its permitted boundaries, with several hectares affected.</p> <p>The new application (Boeteka Doleriet (PTY) Ltd) permit boundaries reach into this already disturbed area. The questions that arise are:</p> <ul style="list-style-type: none"> How/ when will rehabilitation be done to the old, permitted area, as well as to the affected, non-permitted areas Have the Department of Minerals and Energy been notified of these permit violations, as the new permit application partially falls within the said area and is an agreement in place to remedy the above? 			

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<p>Any matters relating to possible compliance issues associated with Lombardskraal Doleriet (Pty) Ltd constitute separate regulatory and compliance matters for consideration by the Department of Mineral and Petroleum Resources (DMPR) and are not relevant to the assessment of the current Boeteka Doleriet (Pty) Ltd application. The proposed mining permit application must be assessed independently in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002) (MPRDA) and the National Environmental Management Act, 1998 (Act 107 of 1998) (NEMA) requirements. The DBAR acknowledges that the proposed 4.9 ha footprint is partially disturbed by adjacent historical mining activities and specifically motivates the site as the preferred alternative due to the existing disturbance and low agricultural potential of the area.</p> <p>The disturbed area located outside of the approved mining area does not constitute an expansion of the mining footprint or mining activities. This area is situated on land rented by the landowner specifically for the temporary storage/stockpiling of material that had already been mined and sold pending collection. The area was historically disturbed prior to its use for stockpiling and no additional vegetation clearing, excavation, or mining-related disturbance was undertaken in this location. The stockpiling activity is therefore considered ancillary storage on an already disturbed area and falls outside the active mining footprint and extraction activities.</p> <p>2. Landowner consent</p> <p>In your supporting documents to the DBAR you attached a letter by Crawfords Attorneys referring to Lombardskraal Doleriet (PTY) Ltd that exercised their option to renew the land use agreement with the landowner for a further 5 years.</p> <p>It is noteworthy to place on record that this letter refers to Lombardskraal Doleriet (PTY) Ltd for the renewal of the land use, and not Boeteka Doleriet (PTY) Ltd.</p> <p>The letter by Crawfords attorneys refers to rights that Lombardskraal Doleriet (PTY) Ltd might have or not have, but no reference to Boeteka Doleriet (PTY) Ltd, so no legal grounds was established for permission granted to the new permit application.</p> <p>The MPRDA requires consultation with the landowner and lawful occupiers, which has been undertaken as part of the application and</p>			

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<p>the public participation process. The DBAR confirms that the landowner was consulted regarding the proposed footprint and that a request was submitted to renew the landowner agreement. Any administrative clarification regarding entity references in historical agreements can be provided to the DMPR if required. Therefore, the current application complies with the consultation requirements of the MPRDA and Environmental Impact Assessment Regulations, 2014 promulgated in terms of the NEMA.</p> <p>3. Dust Suppression / Water Use</p> <p>It is noted that applicant will use between 5000 and 10 000 liters of water per day for dust suppression in summer times.</p> <p>We note the following:</p> <ul style="list-style-type: none"> • No mention is made about the water source. • Is it a registered water source, and is there an agreement in place? <p>The DBAR confirms that water will only be used for dust suppression purposes and that approximately 5 000–10 000 litres per day may be required during dry periods. The report specifically states that water will be purchased from a registered lawful source and transported to site when required. No abstraction of groundwater or watercourse impacts are proposed, and no activities will occur within 1 km of a water body. The DBAR therefore concludes that a Water Use Authorisation is not required in terms of the National Water Act. Additional dust mitigation measures, including speed control, covered haul trucks, and minimising exposed surfaces, are included in the Environmental Management Programme report (EMPr) to reduce dust impacts and water consumption.</p> <p>Summary</p> <ul style="list-style-type: none"> • We as permit holders are kept to stringent Environmental Management rules, and this should apply to all stake holders. • Responsible mining, as directed by the Department of Minerals and Energy, should apply to all permit holders. • Can new applications be launched in areas where permitted legislation has been violated? 			

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			<ul style="list-style-type: none"> Both the current permit holder (Lombardskraal Doleriet PTY Ltd) and the new applicant (Boeteka Doleriet PTY Ltd) are owned by the same family. <p>In conclusion, the concerns raised regarding permit boundaries, landowner consent, and dust suppression/water use have been adequately addressed within the DBAR and supporting application documentation for the proposed Boeteka Doleriet (Pty) Ltd mining permit application. The proposed mining area was selected due to its already disturbed condition and low agricultural potential, thereby limiting impacts on undisturbed areas. The application must be assessed independently in terms of the MPRDA and NEMA, and issues raised relating to historical or adjacent mining activities remain separate compliance matters for consideration by the DMPR. The Applicant has complied with the required consultation and public participation processes, and appropriate mitigation measures have been included in the EMPr to manage potential environmental impacts associated with the proposed operation.</p> <p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. All comments received for you as well as our response will be incorporated in the Final Basic Assessment Report to be submitted to DMPR for their consideration.</p>

SUMMARY OF PUBLIC PARTICIPATION PROCESS

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

- telephonic discussions;
- direct communication in the form of emailed Draft Basic Assessment Report Notice
- placement of on-site notices, at the entrance gate of site, and at the Beaufort West local municipality; and advert in the Oudtshoorn Courant on 9 April 2026

Comments received were incorporated into the FBAR to be submitted to the DMPR

See attached as Appendix F1 and F2 proof of the correspondence with the I&AP's and stakeholders during the public participation process.

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-END OF COMMENTS AND RESPONSE REPORT-