

RIVIERA TUNGSTEN MINING PROJECT, BERGRIVIER MUNICIPAL AREA, WESTERN CAPE PROVINCE

COMMENTS AND RESPONSE REPORT

DEPARTMENT REFERENCE NUMBER: WC 30/5/1/2/2/10110 MR

JANUARY 2019



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

COMMENTING PERIOD: 10 DECEMBER 2018 – 5 FEBRUARY 2019

During the initial public participation process the stakeholders and I&AP's were informed of the project by means of background information documents that were sent directly to the contact persons. Due to the compulsory exclusion period over the holidays, the 30-days commenting period was extended with commenting/registration welcome from 10 December 2018 to 5 February 2019. The following table provides a list of the I&AP's and stakeholders that were informed of the project:

STAKEHOLDERS			
<ul style="list-style-type: none"> ⌘ CapeNature ⌘ Department of Agriculture ⌘ Department of Economic Development and Tourism ⌘ Department of Environmental Affairs and Development Planning ⌘ Department of Labor ⌘ Department of Rural Development and Land Reform ⌘ Department of Transport and Public Works ⌘ Department of Water and Sanitation ⌘ Endangered Wildlife Trust (EWT) ⌘ Heritage Western Cape ⌘ SANParks ⌘ South African Heritage Resources Agency 	<ul style="list-style-type: none"> ⌘ Bergrivier Local Municipality ⌘ Bergrivier Local Municipality Ward 5 Councilor (letter to Mayor as Ward 5 councilor post currently vacant) ⌘ Cape West Coast Biosphere Reserve ⌘ Cederberg Bewarea ⌘ Eskom ⌘ Federation for Sustainable Environment ⌘ Krom Antonies Bewarea ⌘ Renosterveld Management Project ⌘ South African Institute for Aquatic Biodiversity ⌘ West Coast District Municipality ⌘ Western Cape Wetland Forum ⌘ Wildlife and Environment Society of South Africa (WESSA) 	<ul style="list-style-type: none"> ⌘ Birdlife South Africa ⌘ Eendekuil Boervereniging ⌘ Elands Bay Environment and Development Action Group (EBEDAG) ⌘ Moutonshoek Employees Association ⌘ Piket-Bo-Berg Residents Association ⌘ Somerset West Bird Club ⌘ Verlorenvlei Coalition ⌘ Verlorenvlei Heritage Settlement and Nature Reserve Homeowners Association ⌘ Verlorenvlei Settlement Elands Bay ⌘ Verlorenvlei WGV ⌘ West Coast Bird Club 	<ul style="list-style-type: none"> ⌘ African Amphibian Conservation Research Group ⌘ Agri Weskaap ⌘ Banghoek Private Nature Reserve ⌘ Cape Bird Club Conservation Committee ⌘ Het Kruis Landbou Vereniging ⌘ Krom Antonies Water Users Association ⌘ Piketberg Forum ⌘ Schapenberg Sir Lowry's Conservancy ⌘ Stawelklip Estate Wememers Trust ⌘ Verlorenvlei Fragrant Product CC

LANDOWNERS / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES

- ⌘ Landowner of Portion 1 of Farm 297
- ⌘ Landowner of Portion 6 (Remaining Extent) of Namaquasfontein 76
- ⌘ Landowner of Portion 21 of Namaquasfontein 76
- ⌘ Mr JJ Smit (surrounding landowner)
- ⌘ Namquasfontein Boerdery Trust (surrounding landowner)
- ⌘ Zebraskop Boerdery (surrounding landowner)
- ⌘ Karsten Boerdery (Pty) Ltd (surrounding landowner)
- ⌘ Windheuwel Trust (surrounding landowner)

- ⌘ Achtervlei
- ⌘ Banghoek Private Nature Reserve
- ⌘ Bella Vista, Piket-Bo-Berg
- ⌘ Bo Matroosfontein, Redelinghuys
- ⌘ Die Tuin Landgoed
- ⌘ Eagles Pride Farm Workers Group
- ⌘ Excelsior Farm
- ⌘ Jansdrift Farm
- ⌘ Kersfontein Farm
- ⌘ Keurbos
- ⌘ Keurbos Kapteinskloof
- ⌘ Klein Vogel Vallei
- ⌘ Krom Kosie van Niekerk Boerdery
- ⌘ Kruistementvlei Piket-Bo-Berg
- ⌘ Matroozefontein
- ⌘ Mountain Accommodation & Horseback Trails
- ⌘ Moutons Valley (Pty) Ltd
- ⌘ Namaquasfontein Kosie van Niekerk Boerdery
- ⌘ Old Kapteinskloof Guesthouse
- ⌘ Pomona Farm
- ⌘ Protea Producers of SA
- ⌘ Skuinskraal Farm
- ⌘ Solotrade 67 CC t/a Pronkies Holiday Farm
- ⌘ Spaarkloof Farm Tierhoek Organic
- ⌘ Te Voetpad Landowner
- ⌘ Tierhoek Cottages
- ⌘ Uitsig Farm
- ⌘ Unifruitti Matroozefontein
- ⌘ Wilgerbosdrift (Pty) Ltd
- ⌘ Wilgerbosdrift Stud
- ⌘ Wittedrift Farm

- ⌘ Afrikaner, J
- ⌘ Alexander, S
- ⌘ Anderson, B
- ⌘ Arends, C
- ⌘ Arthur, B
- ⌘ Ashwell, A
- ⌘ Beech, C
- ⌘ Black, A & A
- ⌘ Blankenberg, K & F
- ⌘ Blankenberg, M
- ⌘ Bond-Smith, M
- ⌘ Boois J & A
- ⌘ Boois, E
- ⌘ Boois, S & R
- ⌘ Booysen M & J
- ⌘ Bosman, L
- ⌘ Botha, A & G
- ⌘ Botha, G
- ⌘ Brand, G
- ⌘ Brink, P
- ⌘ Brinkworth, B
- ⌘ Brown, N
- ⌘ Brown, TW
- ⌘ Bruwer, P
- ⌘ Bubb, G
- ⌘ Burger, M
- ⌘ Burke, D
- ⌘ Burton-Moore, D
- ⌘ Burton-Moore, P & V
- ⌘ Campbell, B
- ⌘ Castens, P & J & T
- ⌘ Chris, S
- ⌘ Claasen, B
- ⌘ Clayton, J

- ⌘ ADVS Environmental Consultants
- ⌘ Birdlife Overberg
- ⌘ Cape Argus
- ⌘ CAPTRUST
- ⌘ Centre for Environmental Rights
- ⌘ Coastec
- ⌘ Coastel & Environmental Consultants
- ⌘ DA Piketberg
- ⌘ De Vlei Properties
- ⌘ Die Burger
- ⌘ Durbanville Community Forum
- ⌘ Friends of Simon Town Coastline
- ⌘ Hotel Eland
- ⌘ Inter Coast Civils
- ⌘ Jeffares & Green Consulting Engineers
- ⌘ Karookop School
- ⌘ Landbou Weekblad
- ⌘ MultiPurpose Business Solutions
- ⌘ Piketberg Bridal Shop
- ⌘ Plett Bird Club
- ⌘ Residents Association of Hout Bay
- ⌘ SAPD, Eendekuil
- ⌘ SAPS, Piketberg
- ⌘ Sunday Times
- ⌘ Thenosterhoek Eendekuil Department of Development Studies UNISA
- ⌘ University of Cape Town (Environmental & Geographical Science Department)
- ⌘ University of Pretoria
- ⌘ Winelands Action Group
- ⌘ Yellowfish Working Group

	✂ Zandvlei Trust	✂ Cloete, E ✂ Cloete, RC ✂ Coetzee, AM ✂ Coetzee, G ✂ Coetzee, GM & DH ✂ Coetzee, K ✂ Coetzee, M ✂ Cohen, M ✂ Cowley, C ✂ Cox, R ✂ Crowth, P ✂ Da Camara, C ✂ Daniels, J ✂ De Villiers, E ✂ De Villiers, G ✂ De Villiers, J ✂ De Vries, A ✂ De Wet, C ✂ Delmotte, A ✂ Du Plessis, BA ✂ Du Plessis, S ✂ Engelbrecht, J ✂ Engelbrecht, J ✂ Engelbrecht, L ✂ Engelbrecht, M ✂ Engelbrecht, S ✂ Enodada, L ✂ Everett, J ✂ Fazel-Ellahi, S ✂ Ferrar, R ✂ Forbes, L ✂ Fortuin, A ✂ Frans, A ✂ Freemantle, J ✂ Freemantle, R ✂ Fyfe, B & L	
--	------------------	--	--

		<ul style="list-style-type: none">✂ Gallimore, J & M✂ Geldenhuys, M✂ Geldenhuys, M✂ Gelderblom, C✂ George, C✂ Gilbert, A✂ Gildenhuys, D✂ Goedeman, B✂ Goldring, M✂ Gradidge, C✂ Greyling, D & J & M✂ Greyling, I✂ Grutter, H✂ Haarburger, R✂ Haarburger, R✂ Hamer, E & J✂ Hanekom, A & E & S✂ Heath, P✂ Heering, L✂ Hotchkiss, T✂ Hugo, C & P✂ Hurworth, M✂ Hurworth, S✂ Jacobs, C✂ Jacobs, J✂ Jacobus, C✂ Jafta, E✂ Jafta, J & H & M & F✂ Jafta, M✂ Jafta, W✂ Jansen, L✂ Jantjies, J✂ Januarie, A✂ Jeffery, A✂ Jeffry, S✂ Johnson, MT	
--	--	---	--

		✂ Josephs, Mr & Mrs ✂ Joubert, A ✂ Joubert, M ✂ Julius, J ✂ Kankowski, N & T & E & C ✂ Karolis, S ✂ Karolus, M & D & G & L ✂ Keams, A ✂ Kellerman, P ✂ Kelly, P ✂ Kerchhoff, G ✂ Keyster, B ✂ Kilbey, s ✂ Klaasen, A & J ✂ Klaasen, C ✂ Klase, G ✂ Krause, E ✂ Kriel, JG ✂ Krogscheepers, J ✂ Kruger, L ✂ L'Ons, L ✂ Lamont, A ✂ Lamont, J ✂ Langenhoven, L ✂ Le Roux, B ✂ Lewarne, M ✂ Lodge, M & J ✂ Loewenthal, M & C ✂ Loff, S & B ✂ Longden-Thurgood, M ✂ Louw, H ✂ Louw, J ✂ Louw, P ✂ Lucke, C ✂ Marais, K ✂ Marlow, Mrs	
--	--	--	--

		✂ Maseleni, R ✂ Members of P.O. Box 171, Piketberg ✂ Members of P.O. Box 67, Piketberg ✂ Mhlalophe ✂ Miggel, G ✂ Moretti, R ✂ Morgan, J ✂ Mostert, M ✂ Nienaber, MJ ✂ Oktober, B ✂ Oliver, AM ✂ Otzen, F ✂ Paine, T & H ✂ Petersen, E ✂ Pienaar, M ✂ Pienaar, N ✂ Pieters, G ✂ Pieters, L ✂ Pretorius, CM ✂ Priestley, R ✂ Priestly, T ✂ Prinsloo, S ✂ Prophet, C & C ✂ Richer, H ✂ Roberts, H ✂ Roberts, T ✂ Rohloff, W ✂ Roniger, D ✂ Rossouw, A ✂ Rudd, BJ ✂ Saayman, M ✂ Savvides, B ✂ Schmidlin, H ✂ Schnetler, AR & CRR ✂ Schoeman, M ✂ Sheard, B	
--	--	---	--

		<ul style="list-style-type: none">✘ Sheard, J✘ Simons, D✘ Smit, C & P N✘ Smit, HE✘ Smit, HP✘ Smit, NM✘ Smith, C✘ Smith, F & C✘ Smith, G✘ Smith, JW✘ Snewe, C✘ Snyders, G & J✘ Stobart, T✘ Stone, T✘ Strange, F✘ Strauss, PJE✘ Swanepoel, E & J & D✘ Swanepoel, M✘ Swanepoel, M✘ Swanepoel, P & M✘ Swanepoel, T & J✘ Swart, J✘ Swarts, C✘ Swarts, K & A✘ Swarts, R✘ Swats, R✘ Sweetman, H✘ Taylor, J✘ Taylor, J✘ Taylor, K✘ Taylor, L✘ Taylor, P✘ Taylor, P✘ Templeton, R✘ Thomas, GS✘ Thomson, J	
--	--	---	--

		✂ Thomson, M ✂ Titus, J ✂ Titus, L ✂ Todd, A ✂ Todd, J ✂ Todkill, W ✂ Tredoux, H ✂ Tredoux, J ✂ Tripp, M ✂ Truter, E & A ✂ Truter, J & J ✂ Twine, C ✂ Van der Leek, M ✂ Van der Merwe, G ✂ Van der Merwe, I ✂ Van der Merwe, J ✂ Van der Merwe, S ✂ Van der Merwe, W ✂ Van der Westhuizen, E & P ✂ Van Hase, A ✂ Van Lill, M ✂ Van Niekerk, PJC ✂ Van Rensburg ✂ Van Riet, W ✂ Van Rooy, I ✂ Van Rooy, R ✂ Van Staden, D ✂ Van Wyk, B & A ✂ Van Wyk, C ✂ Van Wyk, J ✂ Van Wyk, K ✂ Van Zeuner, J ✂ Vermeulen, H ✂ Visser, F & H ✂ Visser, G & H & J ✂ Visser, M	
--	--	--	--

		<ul style="list-style-type: none">⚡ Vosse, S⚡ Ward, V⚡ Watson, E⚡ Weimers, W⚡ Wesseman, G⚡ Wickins, C⚡ Wiese, A & K⚡ Wiese, K⚡ Willems, B⚡ Williams, C⚡ Williams, F⚡ Williams, G⚡ Willows, B⚡ Willows, D	
--	--	---	--

LIST OF REGISTERED STAKEHOLDERS AND I&APS

COMMENTING PERIOD: 10 DECEMBER 2018 – 5 FEBRUARY 2019

To date (09 January 2019) the following list of stakeholders and I&AP's have registered on the project, submitting the comments as listed below. As mentioned earlier the registration period still extends until 5 February 2019, and all comments/registrations received up to the end date will be included into the Final Scoping Report to be submitted to the Department of Mineral Resources for consideration and approval.

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
Jannie Strydom Louis Wessels Ilana de Klerk	Agri Western Cape	jannie@awk.co.za louis@awk.co.za ilana@awk.co.za	5 December 2018	6 December 2018
Ilana de Klerk registered Messrs. Strydom and Wessels on behalf of Agri Western Cape as I&AP's on the project.				
Greenmined acknowledged receipt of the registration on 7 December 2018, and registered Agri Western Cape accordingly.				
Hannes Vermeulen Angila Joubert	Bergrivier Local Municipality	vermeulenh@bergmun.org.za jouberta@bergmun.org.za	5 December 2018	7 December 2018
<p>Comments received from Bergrivier Local Municipality:</p> <p>“Your notice in abovementioned regard, dated 3 December 2018, refers.</p> <p>It is acknowledged that a scoping report on the proposed development is not available at present, and therefore our comment is limited to the information contained in the background information document provided.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p><u>Environmental comment:</u></p> <p><i>“A hydrogeological assessment will be performed...”</i></p> <p>Comment: Immediate and long term effects of the ground water abstraction should be taken into account as this will affect the water table and also affect natural surface water systems within this area. The hydrogeological assessment should take into account the effects on the environmental integrity of the Verlorenvlei, designated RAMSAR site (Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat). The prospecting site is situated in the area of Verlorenvlei catchment, as rivers and water courses affect and influence each other from kilometers away. The assessment should also consider the affects to the sustainable, ecological functioning of the catchment areas for the Kruis, Bergvallei, the Krom Antonies and the Hol river systems. The potential tungsten contamination of groundwater and aquifers should also be taken into account.</p> <p><i>“An Ecologists was appointed to conduct a full ecological study of the proposed footprint area.”</i></p> <p>Comment: This area falls within the Greater Cederberg Biodiversity Corridor and the impact on Critical Biodiversity Areas must be considered in any specialist studies. The Verlorenvlei system supports several rare bird species and indigenous fish species and the conservation thereof is imperative and any effects of the proposed development should take this into consideration as irreversible impacts on the environment will result in habitat loss and species loss in this area.</p> <p><i>“An agricultural impact assessment will assess the potential impacts of the proposed mining operation on soils, agricultural potential and production.”</i></p> <p>Comment: Blasting and the dispersion of dust particles could disturb or terminate ecosystem functioning and consequently the agricultural potential of the affected area. Abstraction and pollution of water resources could also lower the potential for sustainable agricultural practices, in an already drought prone area. Potential impacts on food security and agricultural yield could also affect human wellbeing.</p> <p><i>“...a traffic impact study will assess the impact that the proposed project will have on the road infrastructure and traffic of the study area.”</i></p> <p>Comment:</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>The traffic impact study should also take into account all routes to be used for the transport of the mined material to other destinations, and traffic through urban settlements. Alternative modes of transport, such as railway transport, should be considered. The traffic impact study should consider the effect of heavy vehicle traffic on the longevity of road and urban infrastructure. Heavy vehicle traffic through urban areas and the effect thereof on road and pedestrian safety, noise and air pollution should also be considered.</p> <p>Planning comment:</p> <p>The background information document states that a land development application has to be submitted to the Department of Environmental Affairs and Development Planning in terms of the Land Use Planning Act, 2014 (Act No 13 of 2014). It must be noted that in terms of Section 53(5) of the Land Use Planning Act, 2014 (LUPA) an approval by the Head of Department (the head of the provincial department responsible for land use planning) of a land development application does not release an applicant from the obligation to obtain the required approval from the municipality for the land development.</p> <p>The subject farms are located within the jurisdictional area of Bergrivier Municipality and are currently zoned as Agriculture Zone 1 in terms of the Bergrivier Municipality: Integrated Zoning Scheme By-Law. The current zoning of the subject farms does not allow for mining or prospecting and therefore land use planning applications must be submitted to Bergrivier Municipality for both instances. In terms of Section 86(1)(b) of the Bergrivier Municipality: By-Law Relating to Municipal Land Use Planning it is an offence to utilize land in a manner other than prescribed by a zoning scheme without the approval of the Municipality.”</p>				
<p>Response to the Bergrivier Local Municipality:</p> <p>“Greenmined herewith acknowledge receipt of your correspondence, received 7 December 2018, with regard to the proposed mining right application to be submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined takes note of the comments tendered by the Bergrivier Municipality, and will communicate it to the relevant specialists, in particular the hydrogeologist, ecologist, rangeland specialist, traffic engineer, and town and regional planner.</p> <p>We have added both yourself as well as Mr Vermeulen as Bergrivier Municipal representatives to the registered stakeholder list and will continue to update you on the project. I can also confirm that the follow persons, as identified by yourself were already contacted and informed of the proposed project:</p> <ul style="list-style-type: none"> ☞ Me Ganten-Bein, ☞ Mr Malherbe, ☞ Mr Burger, 				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p> ☞ Me Strange, ☞ Mr Taylor, ☞ Me Huntly, and ☞ Me February </p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Alana Canham-Duffel	CapeNature	Aduffel-canham@capenature.co.za	5 December 2018	13 December 2018
<p>Comments received from CapeNature:</p> <p>“CapeNature would like to thank you for the opportunity to comment on the Background Information Document for this mining application and would like to make the following comments:</p> <ol style="list-style-type: none"> 1. The Moutonshoek Valley area is of extremely high conservation value, not only for protection of terrestrial ecosystems which support many Species of Conservation Concern but also for provision of water and other ecosystem services. The area has been declared as a Protected Environment and the reasons for this will be discussed in more detail below. However, we first wish to clarify the process that was followed to declare the area as a Protected Environment (PE): <p>The public participation process for the Moutonshoek Protected Environment was started on the 15th of January 2016 and advertised in the Provincial Gazette. In addition, the provincial notice was published in two national newspapers as is required by Section 33 of the National Environmental Management: Protected Areas Act 57 of 2003.</p> <p>As required by Section 32 of the National Environmental Management: Protected Areas Act 57 of 2003, the necessary state departments were consulted. These included the national Minister of Environmental Affairs, The Department of Mineral Resources, the Department of Water Affairs and Forestry, the Department of Environmental Affairs and Development Planning, South African Heritage Resources Agency, the Department of Agriculture, Berg River Municipality, the Regional Land Claims Commission and the South African National Biodiversity Institute.</p> <p>For the purpose of this application, we have attached a copy of the letter sent to the Department of Mineral Resources dated 11 February 2016. Letters and notifications to the other departments were also sent on the 11th of February 2016. The notices to the surrounding landowners were issued on the 22nd of February 2016 and sent out accordingly. Given that the consultative notices were sent out over a period of 1 month, all comments received up until the 10th of April 2016 were taken into account.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>There were no objections received during the public participation process and subsequently after getting all landowners of the Landowner Association to sign their notarial agreements and Memorandum of Agreements the Protected Environment was declared on 20 April 2018 with an erratum notice published on 25 May 2018 given that page 2 of the property list was omitted in the original declaration notice. These documents have also been attached for your information and records.</p>				
<p>As required as part of the consultation process the Moutonshoek Protected Environment was presented to the Joint Planning Task Team (JPTT) on the 29th of September 2017.</p>				
<p>The public participation process for the approval of the Management Plan was completed mid-March 2018 with notices having been published in the Sunday Times, City Press and Rapport on 11 February 2018. No objections to the Management Plan were received through these processes.</p>				
<ol style="list-style-type: none"> <li data-bbox="91 662 2145 949">2. The site is located within the highly sensitive and already water stressed Verlorenvlei catchment. One of the major tributaries which feeds into the Verlorenvlei is the Krom Antonies River which is in the mining application study area. The impacts of the mining activities will extend beyond the area which will be directly transformed. The proposed area is located at the source of the Verlorenvlei, which is internationally recognized as a Ramsar site (one of 19 wetlands in South Africa which have been designated to be of international importance) and is one of the largest natural wetlands along the West Coast of South Africa. Based on the ecological importance of the Verlorenvlei system and recognizing the duty South Africans have at a national level to protect and conserve the wetlands associated with the Ramsar site, all new activities in the Krom Atnoines River valley should result in active upgrading and rehabilitation of the riverine ecosystems. Groundwater is also an important source of water for the Verlorenvlei and any additional activities which will reduce the amount of ground- or surface water available or pose a serious risk of contamination should not be permitted. Agriculture is already highly dependent on groundwater due to limited surface flow and it is unlikely that additional uses can be accommodated. <li data-bbox="91 981 2145 1157">3. Although a portion of the area that would be impacted directly by the proposed mining activities has largely been transformed by agricultural activities, there are still important areas supporting indigenous vegetation, including Leipoldtville Sand Fynbos, which is Endangered, Swartland Shale Renosterveld, which is Critically Endangered, Piketberg Quartz Succulent Shrubland which qualifies as Critically Endangered according to the latest analysis conducted by CapeNature (only 11.7% of its original very small extent is remaining), Piketberg Sandstone Fynbos which is listed as Vulnerable, Cape Lowland Alluvial Vegetation, which is listed as Critically Endangered, and Cape Lowland Freshwater Wetlands. CapeNature does not support any further loss of any Endangered or Critically Endangered vegetation types. <li data-bbox="91 1189 2145 1284">4. The Western Cape Biodiversity Spatial Plan has determined terrestrial and aquatic Critical Biodiversity Areas (CBAs) as well as Ecological Support Areas (ESAs) within and adjacent to the application area. The management objectives of these CBAs and ESAs are vital to consider in order to prevent ecosystem collapse and loss of ecosystem services. <li data-bbox="91 1324 2145 1388">5. Verlorenvlei supports at least 177 bird species including several Red Data Book species including, <i>inter alia</i>, Ludwig's Bustard, Black Stork, Black Harrier and the Secretary Bird. The Verlorenvlei system (which includes the Krom Antonies) also supports four indigenous freshwater fish species, of which three species have not been found 				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>anywhere else. These are the Endangered Verlorenvlei redbfin (now part of the Pseudobarbus group), the Cape kurper (the Verlorenvlei population is genetically very distinct) and Cape Galaxias (two species, one genetically very distinct and restricted to the Verlorenvlei). The Krom Antonies River has a considerable number of critically endangered Verlorenvlei redbfin in its upper reaches where the proposed mining footprint is located. Any mining activities that impact the river could cause extinction of this species which is completely endemic to this site. Although this area is degraded in certain areas, with environmentally sensitive farming practices and proper rehabilitation, this river could return to a good condition with a highly conservation worthy fish assemblage. The Verlorenvlei system is already under high levels of water stress, with fish and other water dependent biota confined to small pools in summer. The Indigenous fish in these pools are very susceptible to changes in water quality and water temperature during these periods.</p> <p>6. The Moutonshoek Valley supports a large number of threatened plant species and animal species from many phyla and it is impractical to list all of them in this letter. However, it must be noted that extensive work has already been undertaken in this area which has highlighted the ecological importance of the Moutonshoek Valley. Lists of species confirmed to be present can be found in the Management Plan for the Moutonshoek Protected Environment.</p> <p>7. CapeNature would also like to draw your attention to the significant investment already made in projects and initiatives in this area. For example, the Working of Wetlands project which has already had millions of rand invested for clearing alien vegetation from the Verlorenvlei system. There are also a range of eco-tourism initiatives being developed and implemented within the Verlorenvlei system, which are dependent on the long-term functioning of the wetland system. Should mining activities go ahead, this would almost certainly negate these positive efforts. Even before the area was declared as a Protected Environment, it formed part of the Greater Cederberg Biodiversity Corridor, which aims to conserve and restore the unique biodiversity of this region and encourage sustainable land use practices.</p> <p>8. CapeNature was not aware that a prospecting right had been awarded for this area. No notifications were received regarding any application for prospecting since 2010. The last letter we submitted with regard to a prospecting application in Moutonshoek valley was to DMR on 17th of June 2010. As a commenting authority we should have been notified and given the opportunity to provide information on the biodiversity importance of the site and raise concerns prior to the prospecting right being issued.</p> <p><u>Conclusion:</u></p> <p>9. The proposed mining activities pose direct and indirect threats to biodiversity and ecological infrastructure found in the Moutonshoek Valley and the Verlorenvlei catchment. CapeNature is of the opinion that the proposed mining activities and associated impacts such as an increase in population (which will bring with it the need for additional roads, water supply, sewage and waste disposal) poses a high level of risk to the terrestrial and aquatic ecosystems in the area and their functioning and high negative irreversible impacts will occur if mining is authorized.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>10. Furthermore, the mining site is located in the center of the declared Moutonshoek Protected Environment. The Protected Environment status of the Moutonshoek area is underpinned by the extremely high conservation importance and ecological sensitivity of the area. The proposed mining activities are in direct conflict with the management objectives of the Moutonshoek Protected Environment.</p> <p>11. CapeNature therefore strongly objects to this application for mining within the Moutonshoek Protected Environment and urges that it not be given any further consideration. CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.”</p>				
<p>Response to CapeNature:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith thank you for your interest, and acknowledge receipt of your correspondence on 13 December 2018 with regard to the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined, on behalf of the applicant, registered CapeNature as a commenting authority on the project, and will keep you posted on the progress of the Environmental Impact Assessment process, as well as provide you with an opportunity to comment on the EIA documentation. Your comments are noted and will be included in the scoping report, and assessed in the environmental impact assessment report.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Karin Otto	Cape West Coast Biosphere Reserve	conservationoffice@capebiosphere.co.za	5 December 2018	14 December 2018
<p>“The Cape West Coast Biosphere Reserve (CWCBR), of the UNESCO: Man and Biosphere Program, aims to implement sustainable development principles along the West Coast, in addition to integrating rapid growth with biodiversity and heritage conservation. The CWCBR extends from the Diep River in the south to the Berg River in the north and inland to Malmesbury and therefore the proposed development is located within the CWCBR. In this regard, the CWCBR would like to register as an I&AP and receive further correspondence and documentation regarding this development.”</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
Greenmined acknowledged receipt of the registration on 7 January 2019, and registered the CWCBR accordingly.				
Adri La Meyer	Department of Environmental Affairs and Development Planning	adri.lameyer@westerncape.gov.za	5 December 2018	14 December 2018
<p>Comments received from the Department of Environmental Affairs and Development Planning:</p> <p>“Thank you for your e-mail of 5 December 2018. Kindly register the Department of Environmental Affairs and Development Planning as a commenting authority for the application. Please provide this Department with 1 x hard copy and 4 x CDs of any reports, marked for my attention please.</p> <p>Could you please provide this Department with a copy of the prospecting right (WC30/5/1/1/2/10197PR) that was issued to the proponent? Also please indicate which waste management listed activities are triggered by the proposal. Please further note that the Waste Act, 2008 requires publication in two newspapers.</p> <p>Please further be advised to also consult with CapeNature, DWS, Department of Agriculture, HWC, West Coast Biosphere Reserve, BirdLife South Africa and West Coast District Municipality.</p> <p>We note the proposed specialist studies – please be advised that a Socio-Economic Specialist Study is highly recommended.</p> <p>The Department will provide more preliminary comment upon receipt of the PR decision.”</p>				
<p>Response to the Department of Environmental Affairs and Development Planning:</p> <p>“Thank you for your response to our email.</p> <p>Greenmined Environmental (hereinafter “Greenmined”) herewith acknowledge receipt of your correspondence received 6 December 2018 with regard to the proposed mining right application to be submitted on behalf of Bongani Minerals (Pty) Ltd. Greenmined, on behalf of the applicant, registered the Department of Environmental Affairs and Development Planning as a competent authority for the application, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process. We also take note of the document requirements.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Attached hereto please find a copy of the prospecting right held by Bogani Minerals (Pty) Ltd.</p> <p>The proposed project will trigger Category A(1) <i>The storage of general waste in lagoons</i> in terms of the National Environmental Management: Waste Act, 2008 read together with the List of Waste Management Activities that have, or are likely to have a detrimental effect on the environment, 2013.</p> <p>Greenmined confirms that we have already notified CapeNature, DWS, DoA, HWC, WCBR, BLSA and WCDM of the proposed project, and will stay in constant communications with them, thank you.</p> <p>We note your remark with regard to a socio-economic specialist study, and can confirm that the specialist has already been appointed and that their report will form part of the EIA documents to be circulated for perusal.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
<p>Further comments received from the Department of Environmental Affairs and Development Planning on 6 December 2018:</p> <p>“Thank you very much for the speedy response and the EAs, it is much appreciated. I assume you are aware of the attached Gazetted proclamation that affects the MR application?”</p> <p>Greenmined confirmed that the client and project team were aware that the proposed mining right application extends over the Moutonshoek Protected Environment.</p>				
<p>On 24 December 2018, a fax was received from DEA&DP acknowledging receipt of the BID:</p> <p>“The Background Information Document (“BID”) dated 3 December 2018, as received by this Department on 11 December 2018, refers.</p> <p>This letter serves as an acknowledgement of receipt of the aforesaid BID by this Directorate.</p> <p>The Directorate: Development Management (Region 1), together with other relevant Organs of State, will act as the commenting authority regarding the application for Environmental Impact Assessment.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Please be advised that it is prohibited in terms of Section 24F of the National Environmental Management Act, 1998 (Act No 107 of 1998) for a person to commence with a listed activity unless the competent authority has granted an environmental authorization for the undertaking of the activity. A person convicted in terms of this prohibition is liable to a fine not exceeding R10 million or imprisonment for a period not exceeding ten years, or to both such fine and imprisonment.</p> <p>Kindly quote the abovementioned reference number in any future correspondence submitted to this Directorate in connection with the application.</p> <p>This Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.”</p>				
Phumeza Qwashu	Eskom	fortuiro@eskom.co.za	5 December 2018	14 December 2018
<p>Comments received from Eskom Distribution:</p> <p>“Eskom has no objection to the proposed work as indicated in your application provided that the following conditions are adhered to:</p> <ol style="list-style-type: none"> I. No building may be erected within 9 (NINE) metres from either side of the centre line from any Eskom 11 / 22kV power line crossing the property involved or within 6 (SIX) metres from any structure supporting mechanism. II. No building may be erected within 3 (THREE) metres from any Eskom underground cable. III. The location of the cable from the Eskom transformer to the distribution box must be pointed out to the contractor by the owner and is the owner’s responsibility. IV. A copy of this letter / documentation must be handed to the contractor who must have it available on site. V. That existing Eskom power lines and infrastructure are acknowledged as established infrastructure on the properties and any rerouting or relocation would be for the cost of the applicant/developer. <p>That Eskom rights or servitudes, including agreements with any of the landowners, obtained for the operation and maintenance of these existing power lines and infrastructure be acknowledged and honoured throughout its lifecycle which include, but are not limited to:</p> <ol style="list-style-type: none"> i. Having 24 hour access to its infrastructure according to the rights mentioned in (a) above. 				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>ii. To perform maintenance (structural as well as servitude – vegetation management) on its infrastructure according to its maintenance programmes and schedules.</p> <p>iii. To upgrade or refurbish its existing power lines and infrastructure as determined by Eskom.</p> <p>iv. To perform any other activity not listed above to ensure the safe operation and maintenance of the Eskom power lines or infrastructure.</p> <p>v. Eskom shall not be liable for the death or injury of any person, or for loss of or damage to any property, whether as a result of the encroachment or use of the area where Eskom has its services, by the applicant, his/her agent, contractors, employees, successors in title and assignee.</p> <p>vi. The applicant indemnifies Eskom against loss, claims or damages, including claims pertaining to interference with Eskom services, apparatus or otherwise.</p> <p>vii. Eskom shall at all times have unobstructed access to and egress from its services.</p> <p>viii. Any development which necessitates the relocation of Eskom’s services will be to the account of the developer.</p> <p>PLEASE CONTACT AND MAKE APPOINTMENT: PIKETBERG CNC- BUKS BURGER 022 913 6311, 082 771 7646 BEFORE WORKING IN CLOSE PROXIMITY TO ANY ESKOM OVERHEAD POWER LINES.</p> <p>The above is a requirement under the Occupational Health and Safety Act (Act No. 85 of 1993) to ensure safety.</p> <p>Please apply to your local Eskom office (Sales and Customers) for a new electricity connection or an increase in your supply.</p> <p>Should it be necessary to move any of the Eskom services a written request must be given to the local Eskom office. It must be noted that it will take 3 month or longer to move any power line and that the cost of moving a power line will be for the applicant’s account.”</p>				
<p>Response to Eskom Distribution:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith thank you for your interest, and acknowledge receipt of your correspondence on 14 December 2018 with regard to the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Greenmined, on behalf of the applicant, registered Eskom Distribution as a stakeholder on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process, as well as provide you with an opportunity to comment on the EIA documentation. Should you not wish to receive these documents please indicate so. Further to the above, your comments/requirements will be forwarded to the client for his attention.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Jacqui van der Merwe	Krom Antoniesrivier Bewarea	namaquas@intekom.co.za	5 December 2018	14 December 2018
<p>Comments received from Mrs Van der Merwe (translated to English for ease of reference):</p> <p>I was and remain an affected person, just as everyone to whom you sent this document. We expect you to automatically replace everyone on your list. Can you please send this document as soon as possible in Afrikaans and Xhosa? The affected area is mostly Afrikaans and Xhosa speaking with very little English. As you probably know it is the Boland. We also find it repugnant that these notifications are sent out just before the holiday season. I assume you are not concerned about your reputation either. Just ask Withers Environmental. I hope you indeed want to “protect the planet”.</p> <p>“Ek was en bly 'n geaffekteerde persoon, en net so almal aan wie jul hierdie dokument stuur. Ons verwag dat julle almal outomaties weer op jul lys sal sit.</p> <p>Kan jul asb hierdie dokument so gou as moontlik in Afrikaans en Xhosa stuur? Die geaffekteerde gebied is meestal Afrikaans en Xhosa en bittermin Engels. Soos jy seker weet is dit die Boland.</p> <p>Ons vind dit ook afstootlik dat hierdie kennisgewings uitgestuur word net voor die vakansie seisoen.</p> <p>Ek aanvaar dat jul ook nie bekommerd is oor jul reputasie nie. Vra maar vir Withers Environmental. Ek hoop jul wil wel die "planeet beskerm."</p>				
<p>Response sent to Mrs Van der Merwe (translated to English for ease of reference):</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Greenmined Environmental (hereinafter "Greenmined") hereby acknowledges receipt of your letter, received on 14 December 2018, in respect of the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd. Greenmined, on behalf of the applicant, has registered you as an interested and affected party (I&AP) on the project and will henceforth keep you informed of the progress of the Environmental Impact Assessment (EIA) process, you will also be given the opportunity to comment on the EIA documentation. Please note that we have already contacted the I&AP's registered on the previous mining application (as handled by Withers Environmental). Since the application took place some time ago (2009), we receive a lot of feedback that people no longer reside in the area, or no longer want to be involved. The document can be made available in Afrikaans and Xhosa. Could you please provide us with the contact details of the Xhosa and Afrikaans speaking I&AP's to enable us to contact them accordingly? Please note that the commenting / registration period extends to 5 February 2019. We trust that you will find the above in order. Please contact me if there are any uncertainties.</p> <p>“Greenmined Environmental (hierna “Greenmined”) erken hiermee ontvangs van u skrywe, soos ontvang op 14 Desember 2018, ten opsigte van die mynreg aansoek wat namens Bongani Minerals (Edms) Bpk ingedien is.</p> <p>Greenmined, namens die aansoeker, het u as ‘n belanghebbende en geaffekteerde party (B&GP) op die projek geregistreer en sal u voortaan op hoogte hou van die vordering van die omgewingsinvoedbepalingsproses (OIB), u sal ook die geleentheid gebied word om kommentaar te lewer op die OIB-dokumentasie. Neem asb kennis dat ons reeds die B&GP'e gekontak het wat op die vorige mynregaansoek (soos hanteer deur Withers Environmental) geregistreer was. Aangesien die aansoek 'n tyd gelede plaasgevind het (2009), kry ons heelwat terugvoer van persone wat nie meer in die omgewing woon, of betrokke wil wees nie.</p> <p>Die dokument kan in Afrikaans en Xhosa beskikbaar gestel word. Kan u ons asb voorsien van die kontakbesonderhede van die Xhosa en Afrikaanssprekende B&GP'e om ons in staat te stel om hulle dienooreenkomstig te kontak?</p> <p>Let asseblief daarop dat die kommentaar-/registrasieperiode tot 5 Februarie 2019 strek.</p> <p>Ons vertrou dat u die bogenoemde in orde vind. Kontak my gerus indien daar enige onsekerhede is.”</p>				
Cindy Ganten-Bein Doretha Kotze Charles Malherbe Municipal Manager WCDM Records	West Coast District Municipality	cgbein@wcdm.co.za dkotze@wcdm.co.za cjmalherbe@wcdm.co.za mm@wcdm.co.za westcoastdm@wcdm.co.za	5 December 2018	5 December 2018

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>☞ Charles Malherbe registered on behalf of the West Coast District Municipality.</p> <p>☞ Angila Joubert (BLM) requested that Cindy Ganten-Bein (WCDM) be added to the contact list. Me. Ganten-Bein objected to the proposed project on 18 December 2018, requested the specialist report for commenting, the environmental authorization (granted), and a fugitive EMP. She raised commented that dust monitoring must be done in accordance with the National Dust Control Regulations, and requested that the Bergrivier Local Air Quality Officer be informed.</p> <p>☞ Doretha Kotze also registered on behalf of the WCDM on 10 December 2018.</p>				
<p>☞ Greenmined acknowledged receipt of the registration on 6 December 2018, and registered the West Coast District Municipality accordingly.</p> <p>☞ Me Ganten-Bein was supplied with a copy of the BID on 5 December 2018. The objection submitted by Me Ganten-Bein was acknowledged on 7 January 2019 and included in the DSR.</p> <p>☞ Me Kotze's request was acknowledged (13 December 2018) and her contact details were added to the WCDM contact list.</p>				
Jan Smit Cor van der Walt	Western Cape Department of Agriculture	jans@elsenburg.com corvdw@elsenburg.com	5 December 2018	14 December 2018
Jan Smit registered the Western Cape Department of Agriculture on the project, objecting to the project due to the impact on agricultural and natural resources.				
Greenmined acknowledged receipt of the registration on 7 January 2019, and registered the Western Cape Department of Agriculture accordingly.				
Simon Baty	Unifrutti / Matroozefonstein Farm	simon@unifrutti.co.za	4 December 2018	20 December 2018

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Comments received from Unifrutti:</p> <p>1. “Unifrutti is objecting to the application of a Mining Right by Bongani Minerals in terms of Section 22 of the Mineral and Petroleum Resources Development Act, 2002 in the Moutons Hoek Valley.</p> <p>The objection is based on the long term impact of the mine on the quality and availability of the underground water resources in the area and the negative impact it will have on farming activities in the Sandveld.</p> <p>2. The following comments are made:</p> <p>There is considerable historical evidence of the negative impact open cast mining has on the quality and availability of underground water in the vicinity of mining operations. Matroozefontein is situated 28.5 km’s from the proposed mine site as the crow flies. The Moutons Hoek valley is an important catchment are for the Veloren Vlei and for replenishing underground water in the Sandveld. This is the best quality water source for the Veloren Vlei and for replenishing underground water in the area. The other catchment areas provide water that is high in salts. Matroozefontein obtains its water from 15 boreholes on the farm. Matroozefontein has a permit to withdraw more than 2 million cubic meters of water/annum. Unifrutti has spent a considerable sum of money investigating the long term sustainable yield and quality of the water from the boreholes on the farm before it purchased the farm in 2004. The tests were done by De Villiers Visser Besproeiing and analyzed by SRK consulting (Compiled by A.C. Woodford). The tests were done for the planning of future citrus and table grape plantings on the farm. Any negative impact to the water resources on the farm will jeopardize the current and future developments on Matroozefontein. This will have negative implications on the long term profitability of the farm and negatively impact employment in the area. Matroozefontein employs a large number of seasonal and permanent people (in excess of 300 people). Currently Matroozefontein is monitoring its boreholes (levels and water quality) on a monthly basis. All the drinking water for Redelinghuys is supplied from the fountain on Matroozefontein. This amounts to 31 liters/second (977,616 cubic m’s/annum). Any changes to the quality and availability of the water from the fountain will have serious health, welfare and development implications for the town. It needs to be pointed out that this residential water qualifies as a priority one supply.”</p>				
<p>Response to Unifrutti:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith thank you for your interest, and acknowledge receipt of your objection on 20 December 2018 with regard to the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined, on behalf of the applicant, registered Unifrutti as an interested and affected party (I&AP) on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process, as well as provide you with an opportunity to comment on the EIA documentation. Your comments are noted and will be</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>included in the scoping report and assessed in the environmental impact assessment report. Your comments will also be forwarded to the geohydrological specialist to be incorporated and assessed in his study.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Eldine Boois	-	P.O. Box 23 Redelinghuys 8105	5 December 2018	08 January 2019
<p>Comments received from Me. Boois (translated to English for ease of reference):</p> <p>Me. Boois strongly objected against the project and stated the following: "Your submission is vague and unclear and not to our advantage. You just want to use up our water and destroy the wetland."</p> <p>"Ek maak ten sterkste objeksie! Julle voorlegging is vaag en onduidelik en nie tot ons voordeel nie. Julle wil net ons water opgebruik en die vleiland vernietig!"</p>				
<p>Response to Me. Boois (translated to English for ease of reference):</p> <p>Greenmined Environmental (Pty) Ltd (hereinafter referred to as "Greenmined") hereby acknowledges receipt of your letter, received on 8 January 2019, in respect of the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd. Greenmined, on behalf of the applicant, has registered you as an interested and affected party (I&AP) on the project and will henceforth keep you informed of the progress of the Environmental Impact Assessment (EIA) process, you will also be given the opportunity to comment on the EIA documentation.</p> <p>The impact of the proposed mining on the socio-economic condition as well as the water in the receiving environment will be examined, assessed and discussed in the Environmental Impact Assessment Report. As an I&AP, the report will also be made available to you for commenting. We trust that you will find the above in order. Please contact me if there are any uncertainties.</p> <p>"Greenmined Environmental (Pty) Ltd (hierna genoem "Greenmined") erken hiermee ontvangs van u skrywe, soos ontvang op 8 Januarie 2019, ten opsigte van die mynreg aansoek wat namens Bongani Minerals (Edms) Bpk ingedien is.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Greenmined, namens die aansoeker, het u as 'n belanghebbende en geaffekteerde party (B&GP) op die projek geregistreer en sal u voortaan op hoogte hou van die vordering van die omgewingsinvoedbepalingsproses (OIB), u sal ook die geleentheid gebied word om kommentaar te lewer op die OIB-dokumentasie.</p> <p>Die impak wat die voorgestelde myn op die sosio-ekonomiese toestand, sowel as die water in die omgewing mag het sal in die omgewingsimpakbeoordelingsverslag ondersoek, beoordeel en bespreek word. As B&GP sal die verslag ook aan u beskikbaar gestel word vir kommentaar.</p> <p>Ons vertrou dat u die bogenoemde in orde vind. Kontak my gerus indien daar enige onsekerhede is.”</p>				
Pierre Brink	-	pierrebrink@hotmail.com	4 December 2018	5 December 2018
<p>Pierre Brink requested an electronic copy of the BID.</p>				
<p>Greenmined emailed the BID to Mr. Brink on 6 December 2018. To date no additional comments were received.</p>				
Adv Martin Coetzee	Marcec Legal Consulting	marcec@mweb.co.za	4 December 2018	14 December 2018
<p>Comments received from Adv. Coetzee:</p> <p>“Thank you for sending me a notification of this.</p> <p>I have been and still will be forwarding this to my clients as they were during 2012, and will await their instructions. It is unfortunate that this notification was issued at this time of year when many persons are on leave.</p> <p>I am fairly certain that this application will be met, as it was in 2012 with the Applicant's prospecting right application, with vigorous opposition.</p> <p>Unfortunately, the BID is not very helpful, because of its generalist nature. It offers no substantive information or reasoning.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>As an example, it is completely silent about the fact that this application is brought in respect of a promulgated protected environment namely, the Moutonshoek Protected Environment. It is not clear how the applicant intends to circumvent the restrictions imposed on mining in this MPE by the National Environment: Protected Areas Act, 2003.</p> <p>Furthermore, it is a fact that the application will be brought in respect of agricultural land. An application will have to be made to the local authority for consent use to allow mining.</p> <p>It will therefore be appreciated if the Applicant would indicate if it has applied for such consent use, and, if so, to provide me with copies of the application in respect of each of the portions of land affected.</p> <p>Looking forward towards receiving the Applicant's soonest response."</p> <p>Additional comments submitted by Adv Coetzee (21 December 2018):</p> <p>"Further to my unanswered email below, the following:</p> <ol style="list-style-type: none"> 1. According to your BID it is stated that notice is given of an application of a mining right. In this regard <ul style="list-style-type: none"> ☞ Was an application submitted to and accepted by the DMR, and, if so, kindly provide the DMR reference number for this application? 2. It is further stated that "<i>Owing to the outcome of the prospecting operation, the applicant wishes to apply for a mining right for the winning of tungsten and molybdenum</i>" In this regard <ul style="list-style-type: none"> ☞ On which portions of land were these "prospecting operations" conducted? ☞ Can documentation reflecting and confirming the "outcome of the prospecting operation" be made available? <p>Looking forward towards receiving your soonest responses."</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Response to Adv. Coetzee:</p> <p>“Greenmined Environmental (Pty) Ltd (hereinafter referred to as “Greenmined”) would like to thank you for your interest and herewith acknowledge receipt of your correspondence dated 14 and 21 December 2018 with regards to the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined, on behalf of the applicant, registered you as an interested and affected party (I&AP) on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment (EIA) process, as well as provide you with an opportunity to comment on the EIA documentation.</p> <p><u>Land Use Application:</u></p> <p>Greenmined herewith confirms that the applicant is aware of the rezoning application to be lodged with the competent authorities, however the said application is still in progress and has not yet been submitted.</p> <p><u>Mining Right Acceptance:</u></p> <p>Attached hereto please find a copy of the acceptance letter issued by the DMR on 14 December 2018 with regard to the mining right application. The project specific reference number is: WC 30/5/1/2/2/10110 MR.</p> <p><u>Prospecting Operation:</u></p> <p>The prospecting operation referred to in the BID included geological re-logging of the available historic diamond drill core, resampling of a select number of these holes and a short-lived diamond drilling programme on the Remainder of Portion 6 (portion of portion 2) Namaquasfontein Farm No 76. Your request for “documentation reflecting and confirming the outcome of the prospecting operation” has been forwarded to the applicant and we will respond accordingly upon receipt of the relevant documentation.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
RV Duncan	Pomona Farm	pomona@lantic.net	4 December 2018	10 December 2018

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Rob Duncan objected to the proposed project and requested additional information on hydrology, employment, and fauna and flora. He enquired how underground water will be affected, stated that the mine may decrease jobs in the area and not increase them, and was concerned that natural areas will be cleared. He further enquired about the risk to the Verlorenvlei. Mr. Duncan requested that Gus Pickard be added to the contact list.</p>				
<p>Greenmined acknowledged receipt of the objection on 11 December 2018, and registered Mr. Duncan accordingly. Mr. Duncan's comments were include in the scoping report, and will be assessed in the environmental impact assessment report, both of which documents will be made available for public review and commenting. To adequately address the comments it will be forwarded to the hydrologist, socio-economic specialist as well the ecologist for inclusion in their studies. Mr Pickard was informed of the project on 11 December 2018. To date no comments were received from Mr Pickard.</p>				
Roderick Freemantle	-	roderickjohnfreemantle@gmail.com	4 December 2018	12 December 2018
<p>Comments received from Mr. Freemantle</p> <p>“Please explain how you expect to receive the background information for registration as an Interested and Affected Party when the form you provide cannot be sent electronically. Do you expect it to be sent by post? How do you expect the people of this rural community to register, the people most affected, the majority of whom have no access to computers or post offices?</p> <p>You may as well get used to my name.</p> <p>Anyone involved actively or passively in the application for the right to mine in the Moutonshoek watershed will get to know me very well.</p> <p>We have been down this road before. Whatever it takes, we will go through the whole boring, wasteful process of putting a stop to this mining bid once and for all.”</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Response to Mr. Freemantle:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith acknowledge receipt of your correspondence received 12 December 2018 with regard to the proposed mining right application to be submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined registered you as an interested and affected party on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process.</p> <p>With reference to the sending of the background information document, please note that the form can be saved to your computer from where it can be filled in electronically and attached to an email. However, registration and/or commenting on the project does not necessitate the actual BID form and comments can be send to us by any means (email, post, fax) available to you. Please also note that the initial public notification process further (apart from the notification emails sent by the mailchimp system) included an advertisement in both Die Burger as well as Die Weslander, the placement of 5 on-site notices throughout the study area, as well as providing people without email addresses with letters sent to their postal boxes. Should any person need assistance with the submission of comments he/she is welcome to contact us telephonically and we will assist as best we can.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p> <p>Mr Freemantle acknowledge receipt of the requested information on 13 December 2018.</p>				
Franci Gresse	-	Franci.gresse@gmail.com	-	09 January 2019
<p>Franci Gresse registered as I&AP on the project and requested that Ms. H Nieuwoudt from the DEA: Working for Wetlands Programme also be invited to comment.</p>				
<p>Greenmined acknowledged receipt of the correspondence on 9 January 2019 and registered Me. Gresse accordingly. As requested Ms Nieuwoudt was supplied with a BID and invited to comment on the project.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
Belia Karsten	Karsten Boerdery	beliak@karsten.co.za	5 December 2018	27 December 2018
<p>Comments received from Karsten Boerdery (Pty) Ltd:</p> <p>“Your Background Information Document (“Document”) dated 3 December 2018 relating to certain applications to be made by Bongani Minerals Propriety Limited (“Bongani”) in terms of the relevant statutes referred to above has reference. Kartsten Boerdery Proprietary Limited (“Company”) wishes to register as an interested and/or affected party in relation to the entirety of the activities and/or applications envisaged in terms of the Document.</p> <p>By way of background, this Company is the registered owner of the Remainder of Portion 2 (Kromvlei) of the Farm Namaquasfontein, Portion 5 (a portion of portion 1) of the Farm Wilgenhoutdrift and Portion 13 of the farm Namaquasfontein No 76 (“Properties”) all of which are in proximity to the properties in relation to which the several applications by Bongani relate and on which the Company conducts agricultural activities, <i>inter alia</i>, entailing the production of fruit destined for export markets and also livestock. This Company and the activities conducted by it on the Properties, stand to be affected by the mining ancillary activities which Bongani intends to undertake. We shall accordingly appreciate receiving your confirmation that the Company has been registered in your records as an interested and affected party (“IAP”).</p> <p>As an IAP, we would like to receive a copy of the Draft Scoping Report (“DSR”) to enable us to comment thereon. Without limiting the generality of the foregoing, we also demand to receive copies of all other documents in respect to the processes that are to be followed and as detailed in the Document in order to enable us to assess the contents thereof, including the impact of any proposed activities and to comment and/or object thereto. Our address details appear from this letterhead and you can also communicate with us by e-mail (beliak@karsten.co.za) provided that all documents underlying the different applications to be filed by Bongani in terms of the appropriate statutes, must also be mailed to our physical address.</p> <p>On the last page of the document you mention that, in the absence of receiving any comment on or before 5 February 2019, it will be accepted that we do not have any objections/comments with regard to the project and do not require any further documentation. We hereby want to state emphatically that you cannot make any such acceptance under any circumstances irrespective of whether or not you have received any objections/comments from our end, timeously or at all.”</p>				
<p>Response to Kartsen Boerdery (Pty) Ltd:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith thank you for your interest, and acknowledge receipt of your correspondence on 27 December 2018 with regard to the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Greenmined, on behalf of the applicant, registered Karsten Boerdery (Pty) Ltd as an interested and affected party (I&AP) on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process, as well as provide you with an opportunity to comment on the EIA documentation.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Henk Brand	Karoo kop Primary School	karookopps@gmail.com	5 December 2018	07 January 2019
<p>Comments received from Mr. Brand (translated to English for ease of reference):</p> <p>Mr. Brand objected on behalf of the Karoo kop Primary School to the development of the proposed mine. Mr. Brand requested all information to be supplied in Afrikaans and Xhosa since the majority of people are either Afrikaans- or Xhosa. Mr. Brand is concerned about the safety of learners that daily uses the road on their way to school, as the same road will be used by trucks. Mr. Brand stated that noise levels (as a result of the mine) will make teaching very difficult since the mine will border the school. Another concern is that the health of learners may be affected as a result of dust and other gasses generated as a result of the mine. Mr. Brand stated that many parents will lose their jobs and the existence of the school will be threatened.</p>				
<p>Response to Karoo kop Primary School (translated to English for ease of reference):</p> <p>Greenmined Environmental (Pty) Ltd (hereinafter "Greenmined") hereby acknowledges receipt of your letter, received on 8 January 2019, regarding the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd. Greenmined, on behalf of the applicant, has registered the Karoo kop Primary School as an interested and affected party (I&AP) on the project and will henceforth keep you informed of the progress of the Environmental Impact Assessment (EIA) process, you will also be given the opportunity to comment on the EIA documentation. We take note of your request for project information to be made available in Afrikaans and Xhosa. The concerns listed by you will form part of the draft Scoping Report and will be examined in the Environmental Impact Assessment Report. Your comments will also be send to the traffic engineer (responsible for the traffic impact assessment), as well as the specialists responsible for the noise impact study, atmospheric impact assessment, and socio-economic impact assessment in order to assess the potential impacts on the study area. We trust that you will find the above in order. Please contact me if there are any uncertainties.</p> <p>“Greenmined Environmental (Pty) Ltd (hierna “Greenmined”) erken hiermee ontvangs van u skrywe, soos ontvang op 8 Januarie 2019, ten opsigte van die mynreg aansoek wat namens Bongani Minerals (Edms) Bpk ingedien is.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Greenmined, namens die aansoeker, het die Karookop Primêre Skool as 'n belanghebbende en geaffekteerde party (B&GP) op die projek geregistreer en sal u voortaan op hoogte hou van die vordering van die omgewingsinvoedbepalingsproses (OIB), u sal ook die geleentheid gebied word om kommentaar te lewer op die OIB-dokumentasie.</p> <p>Ons neem kennis van u versoek dat projek inligting in Afrikaans en Xhosa beskikbaar gestel moet word.</p> <p>Die bekommernisse soos deur u gelys sal deel vorm van die konsepbestekopnameverslag en ondersoek word in die omgewingsimpakevalueringsverslag. U kommentaar sal ook aan die verkeersingenieur (verantwoordelik vir die verkeer impakassessering), asook die spesialis verantwoordelik vir die geraasimpakstudie, atmosferiese impakbepaling, en sosio-ekonomiese impakstudie gestuur word sodat hulle die potensiele impak daarvan op die studie area kan evalueer.</p> <p>Ons vertrou dat u die bogenoemde in orde vind. Kontak my gerus indien daar enige onsekerhede is.”</p>				
Lynette Munro	Conservation Partnership Facilitator Cape Town Environmental Education Trust (CTEET)	lynettem@cteet.co.za	-	07 January 2019
<p>Lynette Munro registered as an I&AP on the project and requested a copy of the DSR.</p>				
<p>Greenmined acknowledged receipt of the request on 8 January 2019 and registered Me Munro accordingly. A copy of the DSR will be supplied in due course.</p>				
Mark Munro	Munstone	mmunro@munstone.co.za	-	07 January 2019
<p>Comments received from Mr. Munro:</p> <p>Mr. Munro reserved his opinion until receipt of the various impact assessments and studies have been made available through the EIA process. He requested copies of the geohydrological report, engineering services report, freshwater ecological assessment and ecological study. Mr. Munro tendered concern about the potential effect on the groundwater table and conditions of water, and requested that the engineering services report define effluent and waste water run-off. Further to this, he offered concern about dust control (generated as a result of mining and hauling), as well as the receiving environment.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Mr. Munro stated that in principle he supports the activity contributing to the socio-economic improvement of the region subject to the committed and monitored preservation of the receiving environment.</p>				
<p>Response to Mr. Munro:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith thank you for your interest, and acknowledge receipt of your correspondence received 14 December 2018 with regard to the mining right application submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined, on behalf of the applicant, registered you as an interested and affected party (I&AP) on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process, as well as provide you with an opportunity to comment on the EIA documentation. Your concerns are noted, will be included in the scoping report, and assessed in the environmental impact assessment report of which the geohydrological-, engineering services report, freshwater ecological assessment, and ecological study will form part.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Ben Sheard	-	sheardben@gmail.com	4 December 2018	08 December 2018
<p>Comments received from Mr. Sheard:</p> <p>Mr. Sheard objected to the project and requested additional environmental reports and information. Mr. Sheard stated that: “Bongani Minerals applied for this same permit a few years ago, and it was quickly shut down. They are now applying again. They are planning on mining in the same valley as the Verlorenvlei, which is a RAMSAR-protected site. The mining operation will undoubtable have a negative effect on the surrounding environment, and it cannot be allowed to proceed.”</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
<p>Response to Mr Sheard:</p> <p>“Greenmined Environmental (hereinafter “Greenmined”) herewith thank you for your interest, and acknowledge receipt of your objection received 8 December 2018 with regard to the proposed mining right application to be submitted on behalf of Bongani Minerals (Pty) Ltd.</p> <p>Greenmined, on behalf of the applicant, registered you as an interested and affected party (I&AP) on the project, and will henceforth keep you posted on the progress of the Environmental Impact Assessment process, as well as provide you with an opportunity to comment on the EIA documentation. Your comments are noted and will be included in the scoping report and assessed in the environmental impact assessment report.</p> <p>We trust you will find this in order. Please do not hesitate to contact me in the event of any uncertainties.”</p>				
Fritz van Zyl	-	Fritz.vanzyl@capetown.gov.za	-	05 December 2018
<p>Fritz van Zyl requested a copy of the BID and enquired whether it was available in Afrikaans.</p>				
<p>Greenmined supplied Mr Van Zyl with an electronic copy of the BID on 6 December 2018, and responded (in Afrikaans) that the BID is currently only available in English but should Mr Van Zyl require an Afrikaans document, it could be translated. Mr Van Zyl has to date not requested an Afrikaans copy of the BID.</p>				
Minette Visser	-	minetv@gmail.com	4 December 2018	05 December 2018
<p>Minette Visser registered as an I&AP on the project and requested a copy of the BID form.</p>				
<p>Greenmined supplied Me Visser with a copy of the BID on 6 December 2018 and registered her as an I&AP. To date no additional comments were received from Me. Visser.</p>				

CONTACT PERSON	ASSOCIATION	CONTACT DETAILS	CONTACTED DATE	RESPONSE RECEIVED
Johan Yeld	Journalist	jayeld@gmail.com	4 December 2018	11 December 2018
John Yeld registered as an I&AP on the proposed project.				
Greenmined registered Mr. Yeld as an I&AP on 11 December 2018.				

SUMMARY OF INITIAL PHASE PARTICIPATION PROCESS

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

- ☞ telephonic discussions,
- ☞ direct communication with background information documents (email, registered mail),
- ☞ placement of on-site notices (five notices), and
- ☞ placement of an advertisement in Die Burger.

To date (9 January 2019) the following I&AP's and stakeholders commented on the project:

- ☞ Agri Western Cape
- ☞ Bergrivier Local Municipality
- ☞ CapeNature
- ☞ Cape West Coast Biosphere
- ☞ Department of Environmental Affairs and Development Planning
- ☞ Eskom
- ☞ Krom Antonies Bewarea
- ☞ West Coast District Municipality
- ☞ Western Cape Department of Agriculture
- ☞ Baty, S (Matroozefontein Farm & Unifrutti)
- ☞ Bois, E
- ☞ Brink, P
- ☞ Coetzee, M (Marcec Legal Consulting)
- ☞ Duncan, R. V (Pomona Farm)
- ☞ Freemantle, R. J
- ☞ Gresse, F
- ☞ Karsten, B (Karsten Boerdery (Pty) Ltd)
- ☞ Karookop Primary School
- ☞ Munro, L
- ☞ Munro, M (Munstone)
- ☞ Sheard, B

SUMMARY OF INITIAL PHASE PARTICIPATION PROCESS

- ∞ Van Zyl, F
- ∞ Visser, M
- ∞ Yeld, J

The Department of Land Affairs confirmed that no land claim appears on their database in respect of Portion 1 of Farm 297 RD, Portion 6 (Remaining Extent) of Namaquasfontein 76 RD, and Portion 21 of Namaquasfontein 76 RD.

The Draft Scoping Report was subsequently compiled and all the I&AP's and stakeholders listed above will be afforded an opportunity to comment on the report. A 30-days commenting period (ending 12 February 2019) will be allowed for perusal of the documentation by the I&AP's and stakeholders. Comments received on this document will be added to the Final Scoping Report to be submitted to DMR for review. See attached Appendix A as proof of the correspondence with the I&AP's and stakeholders during the public participation process.

-END OF COMMENTS AND RESPONSE REPORT-