

INZALO CRUSHING AND AGGREGATES (PTY) LTD

**PROPOSED STOCKPILE AREA ON PORTION OF
PORTION 7 OF THE FARM ROODEKRANS 457,
ADMINISTRATIVE DISTRICT IS, MPUMALANGA
PROVINCE**

DEPARTMENTAL REFERENCE NUMBER:

1/3/1/16/1G-356

COMMENTS AND RESPONSE REPORT

MAY 2025



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

COMMENTING PERIOD: 29 APRIL 2025 – 30 MAY 2025

During the public participation process the stakeholders, landowner, surrounding landowners and I&AP's were informed of the project by means of telephonic discussions, electronic correspondence, as well as an advert placed in the Standerton Advertiser. Notices were also placed at the entrance to the site, as well as at the Morgenzon/Lekwa Local Municipality. A 30-days commenting period was allowed. The following table provides a list of the I&AP's and stakeholders that were informed of the project:

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Ms S Mbuyane HOD Mr CM Chunda	Department of Agriculture, Rural Development, Land & Environmental Affairs	29 April 2025	No Comments Received
HOD Mr CM Chunda MEC Ms MC Masilela	Department of Economic Development, Environment and Tourism	29 April 2025	No Comments Received
Mr S Hlatshwayo	Department of Economic Development, Environment and Tourism – Environmental Impact Management	29 April 2025	No Comments Received
Mr Morake Charles Morolo	Department of Public Works, Roads and Transport	29 April 2025	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Ms Dudu Sifunda	Department of Water & Sanitation	29 April 2025	No Comments Received
Ms Zithini Dlamini	Department of Agriculture, Rural Development, Land and Environmental Affairs	29 April 2025	No Comments Received
Mr Richard Mokoena	Department of Labour	29 April 2025	No Comments Received
Josiah Zungu Sebenzile Mhlongo Mendy Nemanashi	Eskom	29 April 2025	No Comments Received
M. Manager Mr M Kunene	Gert Sibande District Office	29 April 2025	No Comments Received
Mr CA Habile	Gert Sibande District Municipality	29 April 2025	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Phiwokuhle Brian Nkosi	Gert Sibande District Municipality - Planning	29 April 2025	No Comments Received
Mr MJ Lamola	Lekwa Local Municipality	29 April 2025	No Comments Received
Mr Thabang Motaung	Lekwa Local Municipality Ward Councillor 12	29 April 2025	No Comments Received
Mr John Pakwe	South African Heritage Resource Agency (SAHRIS)	29 April 2025	19 November 2024 09 April 2025
<p><u>Interim Comment received on 19 November 2024:</u></p> <p>The SAHRA Development Applications Unit (DAU) is making the following comments in terms of section 38(8) of the National Heritage Resources Act as contemplated by the EIA process in terms of section 24(4)b(ii) of NEMA:</p> <p>The SAHRA DAU is requesting a field-based Heritage Impact Assessment study for the proposed developments in terms of section 38(8) of the NHRA.</p> <p>The report must comply with the SAHRA 2007 Minimum Standards: Archaeological and Palaeontological Components of Impact Assessment Reports</p>			

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			<p>The proposed development is located within an area of largely negligible and a small portion of high Palaeontological Sensitivity as per the SAHRIS PalaeoSensitivity map. As such, a desktop Palaeontological Impact Assessment (PIA) must be undertaken by a qualified palaeontologist.</p> <p>(See https://www.palaeosa.org/heritage-practitioners.html for a list of qualified palaeontologists). The report must comply with the 2012 Minimum Standards: Palaeontological Components of Heritage Impact Assessments. The Minimum Standards refer to a Letter of Recommendation for Exemption for further studies should the specialist deem it appropriate. SAHRA reserves the right to insist on a fieldbased assessment should the Letter of Recommendation not provide ample information to make an informed comment.</p> <p>Furthermore, appendices to the DBAR for the proposed development are required. Further comments will be issued upon submission of further requirements.</p> <p><u>Greenmined Environmental's response:</u></p> <p>Beyond Heritage (Pty) Ltd was appointed to undertake a specialist Heritage Impact Assessment for input in the EIA process in terms of section 24(4)b(ii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). Kraljevi?, L., 2025. Heritage Impact Assessment for the Proposed Roodekrans Mining Permit and Stockpile Near Morgenzon, Mpumalanga Province, which was then uploaded on the SAHRIS system on 12 March 2025 for review and approval of the buffer zones, as requested by the heritage specialist. Final approval was granted on 10 April 2025.</p> <p><u>Final Comment received by SAHRIS Case Officer Mr Pakwe on 09 April 2025:</u></p> <p>Beyond Heritage (Pty) Ltd was appointed to undertake a specialist Heritage Impact Assessment for input in the EIA process in terms of section 24(4)b(ii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA). Kraljevi?, L., 2025. Heritage Impact Assessment for the Proposed Roodekrans Mining Permit and Stockpile Near Morgenzon, Mpumalanga Province.</p> <p>On Stockpile 1, the assessment identified a burial ground containing approximately 35 graves (RD001) considered to be of high heritage significance. Furthermore, sites RD002, RD003 and RD004 were identified, however, they have not had their age, purpose or significance confirmed due to the overgrown vegetation and there is uncertainty of whether an archaeological deposit exists. No heritage resources were identified on Stockpile 2. All these sites will be affected by the proposed development on the preferred Stockpile 1.</p>

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<p>No studies required for Palaeontology as the proposed development footprint lies on the negligible PalaeoSensitivity in terms of the SAHRIS PalaeoSensitivity Map.</p> <p>Recommendations made by the specialist report:</p> <p>A buffer zone of a 100 m around site RD001 containing identified graves. Buffer zones of 30 m must be observed around RD002, RD003 and RD004 with the layout plan adjusted to incorporate such no-go areas.</p> <p>A letter of request for the relaxation of the recommended buffer zone around site RD001 has been submitted. Greenmined Environmental is requesting for a reduction of the recommended 100m buffer zone to 40m around the graves identified on the proposed mining permit and stockpile application areas. The request was supported by a Blasting Report prepared by BME Blasting Solutions.</p> <p>The normal tolerable vibration for graves is stipulated as 150mm/s. However, in this case, the maximum limit will be reduced to 50mm/s due to the condition of the graves. The maximum generated vibrations at 40m distance from RD001 are calculated as 91.5mm/s, which is higher than the 50mm/s tolerable limit. This then introduces a concept of decking, which is the separation of explosive charge within a blast that will fire at different delays. The current blast designs may be applicable to a distance of 60m from the graves, or decking may be introduced between 60m to 40m, and a crushed aggregate must be used as a suitable stemming material.</p> <p>Scaled Depth of Burial (SDOB) is used to estimate the Flyrock range which confirmed that it may impact on RD001 and it is estimated to travel beyond a 100m radius.</p> <p>38(4)a – The SAHRA Development Applications Unit (DAU) has no objections to the proposed development.</p> <p>38(4)b – The recommendations of the specialists are supported and must be adhered to. Further additional specific conditions are provided for the development as follows:</p> <p>Based on the Blasting Report, the SAHRA DAU is approving the reduction of the 100m buffer zone around site RD001 to 40m with decking due to the number of graves and unknown SDOB of all graves, and to mitigate the impacts of Flyrock. If the implementation of this condition is not possible, a permit in terms of section 36 of the NHRA for the Grave Relocation Process must be obtained and process completed prior to construction activities.</p> <p>38(4)c(i) – If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell</p>			

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<p>fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA DAU (John Pakwe 0638941979 / jpakwe@sahra.org.za) must be alerted as per section 35(3) of the NHRA. Non-compliance with this section of the NHRA is an offense in terms of section 51(1)e of the NHRA and item 5 of the Schedule;</p> <p>38(4)d – See section 51 of the NHRA regarding offences;</p> <p>38(4)e – The following conditions apply with regards to the appointment of specialists: If heritage resources are uncovered during the course of the development, a professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the heritage resource. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required subject to permits issued by SAHRA;</p> <p>The decision regarding the EA Application must be communicated to SAHRA and uploaded to the SAHRIS Case application.</p> <p>SAHRIS Case was closed on 10 April 2025 with no further comments received.</p>			

LANDOWNER, SURROUNDING NEIGHBOURS, INTERESTED AND AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION /PROPERTY DESCRIPTION	CONTACTED DATE	RESPONSE RECEIVED
JP Swart	Application Landowner as well as surrounding landowner Roodekrans 457 Portion 7 Roodekrans 457 Portion 6 Roodekrans 457 Portion 21 Roodekrans 457 Portion 22 Roodekrans 457 Portion 23	25 September 2024	No Comments Received
H.P & S.M. Bekker	Surrounding Landowner Roodekrans 457 Portion 8 (remaining extent) Roodekrans 457 Portion 24 Roodekrans 457 Portion 14	25 September 2024	No Comments Received

SUMMARY OF PARTICIPATION PROCESS

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

- telephonic discussions;
- direct communication with notification emails inviting comments;
- placement of on-site notices; and
- placement of an advertisement in Standerton Advertiser on 27 September 2024.

A 30-day commenting period was allowed for perusal of the documentation and submission of comments. No comments were received from any parties involved.

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

-END OF COMMENTS AND RESPONSE-