

MAKHANDA MINING (PTY) LTD

**APPLICATION FOR A SECTION 102 AMENDMENT APPLICATION
IN TERMS OF THE MPRDA, 2002 FOR A MINING RIGHT HELD
OVER THE REMAINING EXTENT OF THE FARM
BRAKKEFONTEIN NO 243 IN THE ALBANY DISTRICT, EASTERN
CAPE**

COMMENTS AND RESPONSE REPORT

DEPARTMENTAL REFERENCE NUMBER:

EC 30/5/1/2/2/0056 MR

JUNE 2022



NOTIFICATION OF STAKEHOLDERS AND I&APS CONCERNING THE SECTION 102 APPLICATION

COMMENTING PERIOD: 06 MAY – 06 JUNE 2022

During the public participation process the relevant stakeholders and I&AP's were informed of the project by means of an advertisement in the Daily Dispatch and The Herald, and on-site notices that were placed at the property boundary as well as the Makana Library in town. A notification letter inviting comments on the DBAR over a 30-days commenting period (ending 06 June 2022) was also sent to the landowner, neighbouring landowners, stakeholders, and any other I&AP that may be interested in the project. The comments received on the DBAR were incorporated into the final Basic Assessment Report (FBAR) to be submitted to the DMRE for consideration. The following I&AP's and stakeholders were informed of the project:

STAKEHOLDERS AND I&AP'S			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Me Nelisa Nama	Sarah Baartman District Municipality	6 May 2022	6 June 2022
<p>Comments received from SBDM on the DBAR:</p> <p>“...<u>Tank Maintenance</u></p> <p>Figure 7 as it appears on page 20 of the DBAR indicates that the proposed tanks will be installed and managed in the same manner as the exiting tanks at the site are managed. But, from the picture on the left it is so evident that the tanks need attention as there is an indication of oil spillages. A maintenance and or caution and management when using them is recommended. The Applicant is requested to conduct ongoing improvements on oil storage operation for all the tanks. The Applicant is requested to instal a secondary containment around the storage tanks and a constant maintenance thereof is advised.</p>			

STAKEHOLDERS AND I&AP'S

TITLE, NAME AND SURNAME

AFFILIATION/KEY STAKEHOLDER STATUS

CONTACTED DATE

RESPONSE RECEIVED

Risk Analysis

The Applicant is advised to thorough analyse all risks associated with the tank installations more-so the bund to adhere to the bund specifications as outline on page 28 of the DBAR to contain spillages and incidents that can emerge.

Environmental Authorisation

The Applicant is advised to consider including the following listed activity:

GNR 327 Listing Notice 1 Activity 51:

The expansion and related operation of facilities for the storage, or storage and handling, of a dangerous good, where the capacity of such storage facility will be expanded by more than 80 cubic metres.

The Applicant is further advised to note and adhere to the conditions as outlined in the Environmental Authorisation as issued in 2008 by the Department of Economic Development and Environmental Affairs with a reference number: EC06/386/7/07-104.

Waste Management

The applicant is advised to carefully take due diligence in handling hazardous waste on-site and dispose thereof. The waste generated onsite needs to be disposed of at a registered municipal landfill site not at the dumping site as indicated in the DBAR. The applicant needs to dispose all general waste at a registered general landfill site and the hazardous waste to be disposed of at municipality registered hazardous waste landfill site.

The applicant is advised to adhere to the conditions of the waste license to be issued as per the outcome of this application."

STAKEHOLDERS AND I&AP'S

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>Greenmined's response to the comments received on the DBAR:</p> <p><u>Tank Maintenance:</u></p> <p>The use of a maintenance programme for the dangerous goods storage tanks was added to the mitigation measures proposed in this report. It must be noted that the spot perceived to be an oil spill, was in fact dirt/debris that was broomed from the surrounding paved area. However, the comment is noted, and all the dangerous goods tanks will be installed in areas with secondary containment.</p> <p><u>Risk Analysis:</u></p> <p>A thorough risk analysis will be conducted before the installation of the proposed tanks on site, and the outcome of this analysis will be filed on site for auditing purposes.</p> <p><u>Environmental Authorisation:</u></p> <p>GNR 327 Listing Notice 1 Activity 51 was added to the application as suggested, and the adherence of the Applicant to the current EA issued by the DEDEAT was also added to the mitigation measures in this report.</p> <p><u>Waste Management:</u></p> <p>The DBAR was amended to stipulate the disposal of waste at a registered general/hazardous waste municipal landfill site.</p>			
Mr Moppo Mene	Makana Local Municipality	6 May 2022	No Response Received
Cllr Peter Phumelele	Makana Local Municipality – Ward 1	6 May 2022	No Response Received

STAKEHOLDERS AND I&AP'S

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Govender	Department of Economic Development, Environmental Affairs and Tourism - Sarah Beardman Office	6 May 2022	6 May 2022
<p>Mr Govender registered DEDEAT as a commenting authority on the project, requested a dropbox link to the documents, and asked whether the Provincial Air Quality Official was contacted.</p>			
<p>Greenmined registered the DEDEAT as commenting authority on the project. Provided Mr Govender with a dropbox link on 10 May 2022, and Mr Lyndon Mardon (Provincial Air Quality Official) was copied into the project related correspondence for his records.</p> <p>To date no additional comments were received that could be incorporated into the FBAR.</p>			
M Zikhona Mzalisi	Department of Economic Development, Environmental Affairs and Tourism - Queenstown office	6 May 2022	No Response Received
Mr Briant Noncembu	Department of Economic Development, Environmental Affairs and Tourism - East London Office	6 May 2022	No Response Received
Mr Yawa	Department of Labour	6 May 2022	No Response Received
Mr TL. Manda	Department of Public Works and Infrastructure National Government of RSA	6 May 2022	No Response Received

STAKEHOLDERS AND I&AP'S

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mrs ZB Makina	Department of Rural Development and Agrarian Reform Eastern Cape Provincial Government	6 May 2022	No Response Received
Mr Babini Mbewu	Department of Rural Development and Land Reform Provincial Housing Development Board – Eastern Cape	6 May 2022	No Response Received
Mr J Mhlomi	Department of Transport	6 May 2022	No Response Received
Me Molepo Khuthadzo	Department of Water and Sanitation	6 May 2022	14 September 2020
Mr Aphelele Tomsana	Eskom	6 May 2022	No Response Received
SAHRIS on-line system	SAHRA	6 May 2022	No Response Received

SUMMARY OF PUBLIC PARTICIPATION PROCESS

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

- ◆ telephonic discussions;
- ◆ direct communication with notification letters regarding the availability of the DBAR (email);
- ◆ placement of on-site notices; and
- ◆ the placement of an advertisement in The Daily Dispatch and The Herald on 6 May 2022.

The only comments were received from the Sarah Baartman District Municipality, that was accordingly added to the Final Basic Assessment Report.

See attached as Appendix K2 proof of the correspondence with the I&AP's and stakeholders during the public participation process.

-END OF COMMENTS AND RESPONSE REPORT-