

**SECTION 24G APPLICATION IN TERMS OF THE
NATIONAL ENVIRONMENTAL MANAGEMENT
ACT, 1998 (ACT NO. 107 OF 1998) (“NEMA”) AND
THE ENVIRONMENTAL IMPACT ASSESSMENT
(EIA) REGULATIONS, 2014 (AS AMENDED) -
PORTION 3 OF FARM 1387, EDEN FARM,
UPLAND ROAD, WELLINGTON, DRAKENSTEIN
MUNICIPALITY, WESTERN CAPE**

COMMENTS AND RESPONSE REPORT

DEPARTMENT REFERENCE NUMBER:

REF NO: 14/1/1/E2/3/3/0915/25

NOVEMBER 2025



NOTIFICATION OF SECTION 24G APPLICATION TO STAKEHOLDERS AND I&APS DURING PUBLIC PARTICIPATION

COMMENTING PERIOD PHASE 1: 09 OCTOBER 2025 - 10 NOVEMBER 2025

The relevant stakeholders and I&AP's were informed of the Section 24G application by means of an advertisement in the Paarl Post newspaper, and on-site notices that were placed on the farm fence of the application area; Portion 3 of Farm 1387, Eden farm, and at Drakenstein Local Municipality. A notification mail inviting comments and registration over a 30-days commenting period was also sent to the landowner, neighbouring landowners, stakeholders, and I&AP's that may be interested in the project. Please refer to Appendix F1 + F2 for the proof of public participation conducted thus far. 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
Dr Johan Leibrandt	Drakenstein Local Municipality	09 October 2025	No Comments received
Mr Bazil Jacobs	Drakenstein Local Municipality Ward 29 Councillor	09 October 2025	No Comments received
Mr Henry Prins	Cape Winelands District Municipality	09 October 2025	No Comments received
Me Waseefa Dhansay	Heritage Western Cape	09 October 2025	No Comments received

STAKEHOLDERS

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Ms Sharon February	Cape West Coast Biosphere Reserve	09 October 2025	No Comments received
Mr I Adams	Cape Nature	09 October 2025	No Comments received
Mr Cor Van Der Walt Mr B Layman	Department of Agriculture WC	09 October 2025	10 October 2025

Comment received from Mr B Layman on 10 October 2025:

Hi Anel Olivier

Please note that this office is bound by the government filing system which is currently in physical file format as approved by the Auditor General.

The transition to electronic filing is slow and must be according to government protocols. The provincial department responsible for our electronic storage/filing etc. is in process to develop that. As solution to the cost of printing hard copies and lack of electronic filing system on our side (as discussed above) we decided the best option is to give you as consultants the option for a CD or USB as alternative to hard copy. The main difference between a CD or USB is storage. A hard copy, CD or USB is the "store". Email or we-transfer needs to be printed to be stored physically as we do not have an approved filing system available in the cloud or other network. CD or USB we can still put on a physical file.

Greenmined Environmental's response on 15 October 2025:

Dear Sir,

Thank you for your email.

STAKEHOLDERS

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
The documentation for the 24G application is not yet available for review. It will be shared in the second round of public participation. I've made a note to send out the information on a USB to your offices once the second public participation stage is reached. We trust this meets your favourable approval. <u>Mr B Layman responded on 15 October 2025:</u> Noted. With many thanks and kind regards.			
Mr Mashudu Murovhi	Department of Water and Sanitation	09 October 2025	No Comments received
Mr Solly Fourie	Department of Economic Development and Tourism	09 October 2025	No Comments received
Mrs Adri LaMeyer	Department of Environmental Affairs and Development Planning	09 October 2025	No Comments received
Mr Robert Macdonald	Department of Social Development	09 October 2025	No Comments received
Mr Feroza Albertus	Dept of Forestry, Fisheries and the Environment	09 October 2025	No Comments received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Provincial Manager	Department of Labour, Western Cape Provincial Office	09 October 2025	No Comments received
Mr Lubabalo Mbekeni	Department of Rural Development and Land Reform	09 October 2025	No Comments received
Ms Nicole Abrahams	SANRAL	09 October 2025	No Comments received
Ms Vanessa Stoffels	Department of Public Works and Transport	09 October 2025	No Comments received
Mr J van Staden Ms Prudence Mahlaba	Breede-Gouritz Catchment Management Agency (BGCMA)	Will be contacted during the second PPP phase	No Comments received
Mrs Erika Scholtz	Bergrivier Water Users Association	Will be contacted during the second PPP phase	No Comments received
Dr Edmund Oettle	Spruitriver Water Users Association (SRWUA)		30 October 2025
<u>Comment from Dr Oettle received 30 October 2025:</u>			

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Good day I wish to register as an IAP for the below. Dr Edmund Oettle Upland Organic Estate, Blouville Rd, Wellington On behalf of the Spruitriver Water Users Association (SRWUA) <u>Greenmined Environmental's response on 30 October 2025:</u> Dear Dr. Oettle, Thank you for your email. I herewith confirm receipt and that you have been successfully added as an IAP. You will receive all future updates accordingly. Please let us know if there are any other interested parties you would like us to include. We trust this meets your favourable approval.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr A Esterl	Farm No 1387 Portion 3 (application area)	09 October 2025	No comments received
Mr K Lodge	Farm No 1387 Portion 2	09 October 2025	09 October 2025
<u>Comment received from Mr Lodge on 09 October 2025:</u> Hello, yes we are interested in the matters below. You have my email. Phone is 073-813-2790. Name is Kristoph Lodge <u>Greenmined Environmental's response on 10 October 2025:</u> Dear Mr Lodge, Thank you for your email, I hereby acknowledge receipt and confirmed that as a surrounding landowner you are a registered Interested and Affected Party. The 30-day public participation runs from 9 October 2025 to 10 November 2025. Kindly send any comments or concerns in written format/email before then end of the public participation period. Your feedback is valued and will be addressed accordingly. Many thanks.			
Mrs C Lelard	Farm No 1768 Remaining Extent – La Folie	09 October 2025	03 November 2025

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Comment received from Mrs Lelard on 04 November 2025:</u> Good day, As an owner of a property along the Spruit River, almost opposite Eden Farm, I would like to register as an I&AP. Our property is owned by a company, TERRAFRICA (Pty) LTD, and I am one of the directors. <u>Greenmined Environmental's response on 04 November 2025:</u> Dear Camille, Thank you for your email. I hereby confirm receipt and confirm that you are registered as an Interested and Affected Party (I&AP) in the public participation process for the Section 24G Rectification Application on Portion 3 of Farm 1387, Wellington. Please note that the current stage of the Public Participation Process (PPP) constitutes the registration phase as required under Regulation 8 of the Environmental Impact Assessment Regulations, 2014 (as amended). This phase is intended solely to ensure that all stakeholders are formally recorded prior to the circulation of the Draft Section 24G Application Report and Environmental Management Programme (EMPr). A second round of public participation will follow shortly, during which all registered I&APs will be invited to review and comment on the full Draft Application Report, EMPr, and specialist studies. You will receive written notification once these documents are available for public review, with clear instructions on how to access them both electronically and in hard copy. We appreciate your active participation and your commitment to upholding sound environmental governance. Your comments and observations will be duly noted and included in the application record submitted to the competent authority. If you have any other questions, please do not hesitate to contact us.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Comments received from Mrs Lelard on 09 November 2025:</u> I Camille Lelard, am hereby representing TerraAfrica (Pty) Ltd, the company who owns Farm 1768/0 also known as La Folie. My husband Philip Leilard and my father Christophe Labesse, are also directors. Our farm is situated next to Thankful farm owned by Sharon Rose, on the same side of the river, upstream from Eden farm. We took ownership in March 2025 and were able to join despite the defeat WUA members on the 3rd of April 2025 for the annual river walk. That's when we discovered in shock the extent of the construction and damage on the banks of Eden farm. This serves as a formal objection to the activities in question. We request the demolition of the buildings, gabions and swimming pool and the full restoration of the area to its original state. We would like to raise objection to all the following items: GN R.327 of 2014 (Listing Notice 1) – Activity 12: GN R.327 of 2014 (Listing Notice 1) – Activity 19 GN R.327 of 2014 (Listing Notice 1) – Activity 27 GN R.324 of 2014 (Listing Notice 3 – Western Cape) – Activity 12 GN R.324 of 2014 (Listing Notice 3 – Western Cape) – Activity 14 In the initial document received, it is mentioned apostrophe the construction of an outbuilding apostrophe but there is there seems to be more than one building fromat what we can see when standing in the river. The necessity to demolish is obvious, here are other elements that lead to the same conclusion: The gabions have modified the way the river flows, straightening a river cause causes the water flow to increase in volume and speed leading to higher risks of important damage in case of a flood. The use of impermeable materials like cement creates a barrier that is ecologically detrimental as it prevents the natural absorption and drainage processes essential for the riverbanks. The placement of the pool and the other structures within the sensitive protective riparian buffer zones, raises significant concerns about the handling of grey water and sewage and its potential on the river's water quality. We must consider the immense ecological impact of these constructions. The area is a habitat for valuable indigenous fauna and flora and the severe modification of the riverbanks has irreversibly changed the landscape. This illegal disregard were protected environment is highly detrimental to our valley and cannot be tolerated.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
The peaceful ambience of our beautiful Blouville valley is directly undermined by these constructions. As a magnificent, rural, and a preserved area with heritage status, the valley represents a legacy of hard work by previous generations to protect it is essential that those who disregard these established values and create such an abomination are held accountable. All residents in this wild area must respect the shared understanding that personal development cannot supersede community and preservation standards. These unauthorized constructions are highly problematic because they set a harmful precedent, encouraging others to disregard this necessary building authorizations. I truly hope that this case will be taken very seriously and these violations will be properly dealt with. I thank you for taking our opinions into consideration and allowing us to express our discontent. <u>Greenmined Environmental's response on 13 November 2025:</u> Dear Mrs Lelard, Thank you for your mail, we hereby acknowledge receipt. Warm regards.			
Me S Rose	Farm No 1768 Portion 1 – Thankful Farm	09 October 2025	03 November 2025
Good afternoon, Thank you for the opportunity to participate in this process. I am currently compiling a response. In accordance with Regulation 41 of the EIA Regulations (2014, as amended), and prior to submitting comments, I request access to the complete draft Section 24G Rectification Application Report and all supporting documents for review during the public participation process.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES

TITLE, NAME AND SURNAME

AFFILIATION/KEY STAKEHOLDER STATUS

CONTACTED DATE

RESPONSE RECEIVED

In line with DEADP guidelines and the NEMA Section 24 framework, I anticipate to kindly to have sight of the following:

1. Draft Section 24G Application Report, comprising:
 - o Description of the unlawful activity (e.g., construction without prior environmental authorisation)
 - o Motivation for rectification
 - o Preliminary impact assessment
 - o Alternatives considered
 - o Mitigation measures
 - o Environmental Management Programme (EMPr)
3. Specialist studies, if applicable (e.g., freshwater, heritage, botanical, traffic)
4. Site layout plans or maps detailing the location and extent of the activity
5. Proof of appointment and declaration of independence of the Environmental Assessment Practitioner (EAP)
6. Public participation plan and associated notices, including:
7.
 - o Newspaper advertisements
 - o Site notices
 - o Correspondence to stakeholders

I am keen to know the availability and location of the required documents for review.

Thanks and regards,
Sharon Rose

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's response on 04 November 2025:</u> Dear Sharon, Thank you for your email. I hereby confirm receipt and confirm that you are registered as an Interested and Affected Party (I&AP) in the public participation process for the Section 24G Rectification Application on Portion 3 of Farm 1387, Wellington. Please note that the current stage of the Public Participation Process (PPP) constitutes the registration phase as required under Regulation 8 of the Environmental Impact Assessment Regulations, 2014 (as amended). This phase is intended solely to ensure that all stakeholders are formally recorded prior to the circulation of the Draft Section 24G Application Report and Environmental Management Programme (EMPr). A second round of public participation will follow shortly, during which all registered I&APs will be invited to review and comment on the full Draft Application Report, EMPr, and specialist studies. You will receive written notification once these documents are available for public review, with clear instructions on how to access them both electronically and in hard copy. With regard to your query on site notices, please note that Greenmined Environmental ensured full compliance with Regulation 41(2)(c) of the EIA Regulations. The official Notice of Section 24G Application was properly displayed at the Drakenstein Municipality, Wellington Offices, in a publicly accessible area at the main entrance. Photographic proof of this placement is attached for your records. While every effort is made to maintain visibility of such notices for the prescribed period, we unfortunately cannot be held responsible for notices that may be removed, damaged, or tampered with after being placed. However, we can confirm that all required notices were lawfully displayed in accordance with the regulatory requirements, and their placement has been documented for record purposes. We appreciate your active participation and your commitment to upholding sound environmental governance. Your comments and observations will be duly noted and included in the application record submitted to the competent authority. If you have any other questions, please do not hesitate to contact us.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES

TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr H van der Merwe	Farm No 1778 Portion 4 – Welbedagt Farm	09 October 2025	27 October 2025

Comments received from Mr van der Merwe on 27 October 2025:

Good day,

Thank you for the information provided.

As the representative/owner of the Welbedacht Van Der Merwe Trust, my primary concern relates to the toilets and sewerage system located near our two fountains and river which supplies drinking water to all residents of Welbedacht.

The toilets situated adjacent to Welbedacht's boundary and close to the river should be equipped with conservancy tanks that are regularly pumped out, and not septic tanks.

We kindly request proof or confirmation that this is indeed the case.

Your attention to this matter will be highly appreciated.

Greenmined Environmental's response on 12 November 2025:

Dear Mr van der Merwe,

Thank you for your email dated 27 October 2025 and for registering the Welbedacht Van der Merwe Trust as an Interested and Affected Party (I&AP) in the ongoing Section 24G Rectification process for Portion 3 of Farm 1387, Eden Farm, Wellington.

We appreciate your active participation and take note of your concern regarding the toilets and sewerage system located near your property boundary and the adjacent river, which provides potable water to the residents of Welbedacht.

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Your comment regarding the need for sealed conservancy tanks that are regularly pumped out, as opposed to septic tanks with soak-away systems, has been recorded in the Issues and Response Register forming part of the Environmental Rectification Report. As a registered I&AP, the Welbedacht Van der Merwe Trust will receive direct written notification when the Draft Section 24G Rectification Report becomes available for the formal 30-day Public Participation Process (PPP). This will allow you the opportunity to review the findings, confirm that your concerns have been addressed, and provide any further comments for inclusion in the final submission to DEA&DP. We acknowledge the significance of the Welbedacht fountains and river system as a vital local water source and assure you that your concern will be treated as a priority within this process. Please feel free to contact our office should you wish to discuss this matter further or require any clarification.			
Mr K Harman	Interested and Affected Party		12 October 2025
<u>Comment received from Mr Harman on 12 October 2025:</u> Hello I wish to be registered as an interested party to the Section 24G application Portion 3 of Farm 1387. I have a general interest in environmental matters like these that impact the local area. Where can I find more information pertaining to this?			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's response on 15 October 2025:</u> Dear Sir, Thank you for your email and taking part in the public participation process. I hereby confirm receipt and that you are now registered as and interested and affected party for this project. The documentation for the 24G application is not yet available for review. It will be shared in the second round of public participation. You will be updated accordingly and provided with a link to our website for your perusal when the notices are sent out. We trust this meets your favourable approval. <u>Comment received from Mr Harman on 15 October 2025:</u> Thanks Anel Will there be a comment period after the information is made available, as I currently have nothing to work with? Kind regards, Kurt			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's response on on 15 October 2025:</u> Hi Kurt, Your concern is noted, however another 30 day commenting period will be allowed in the second round of public participation. The commenting period dates will be on the next notice emails sent out. Should you have any other queries or concerns please do not hesitate to contact us.			
Blouvlei Action Group	Me L Armstrong		01 November 2025
<u>Comments received from Me L Armstrong on 01 November 2025:</u> Dear Anel Olivier The Blouvlei Action Group would like to register as an Interested and Affected Party (I&AP) in the above-mentioned application. To facilitate our participation, we kindly request: 1. A copy of the full Environmental Impact Assessment (EIA) or Basic Assessment Report (BAR) prepared for the project, and 2. Information on where and how the public participation notices have been published (e.g., newspaper advertisements, site notices, or online postings). We would appreciate receiving these documents and details by Monday, 3 November 2025, to ensure we can provide timely input during the public participation process. Thank you for your assistance.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's response on on 03 November 2025:</u> Dear Lesley, Thank you for your email I hereby acknowledge receipt and confirm that you have been registered as an Interested and Affected Party (I&AP). Kindly note that the documentation pertaining to the Section 24G application is not yet available for public review. The relevant documents will be circulated during the second round of the public participation process. The first round of public participation was undertaken through an advertisement placed in the Paarl Post newspaper on 09 October 2025, as well as site notices displayed at the Drakenstein Local Municipality offices and at the entrance to the farm site on 08 October 2025 Your feedback is appreciated and will be duly considered and addressed as part of the public participation process. <u>Comments received from Me L Armstrong on 03 November 2025:</u> Dear Anel Thank you for registering the Blouvillei Action Group as an Interested and Affected Party (I&AP) in the Public Participation Process (PPP). We have serious concerns regarding this application and are unable to provide meaningful comments based solely on the newspaper advertisement. We have not seen the site notices that were reportedly displayed at the Drakenstein Municipality offices or at the entrance to the property. The location of the latter notice, in particular, does not appear to be visible to the general public. In order to ensure that our input is informed and not prejudiced by a lack of information, we hereby formally request access to the complete draft Section 24G Rectification Application Report, including all supporting documentation referenced therein. Please confirm when and how these documents will be made available to registered I&APs. We appreciate your prompt attention to this matter and look forward to your response.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's response on 04 November 2025:</u> Dear Lesley, Thank you for your correspondence and for registering the Blouville Action Group as an Interested and Affected Party (I&AP) in the public participation process for the Section 24G Rectification Application on Portion 3 of Farm 1387, Wellington. Please note that the current stage of the Public Participation Process (PPP) constitutes the registration phase as required under Regulation 8 of the Environmental Impact Assessment Regulations, 2014 (as amended). This phase is intended solely to ensure that all stakeholders are formally recorded prior to the circulation of the Draft Section 24G Application Report and Environmental Management Programme (EMPr). A second round of public participation will follow shortly, during which all registered I&APs will be invited to review and comment on the full Draft Application Report, EMPr, and specialist studies. You will receive written notification once these documents are available for public review, with clear instructions on how to access them both electronically and in hard copy. With regards to your query on site notices, please note that Greenmined Environmental ensured full compliance with Regulation 41(2)(c) of the EIA Regulations. The official Notice of Section 24G Application was properly displayed at the Drakenstein Municipality, Wellington Offices, in a publicly accessible area at the main entrance. Photographic proof of this placement is attached for your records. While every effort is made to maintain visibility of such notices for the prescribed period, we unfortunately cannot be held responsible for notices that may be removed, damaged, or tampered with after being placed. However, we can confirm that all required notices were lawfully displayed in accordance with the regulatory requirements, and their placement has been documented for record purposes. We appreciate your active participation and your commitment to upholding sound environmental governance. Your comments and observations will be duly noted and included in the application record submitted to the competent authority. Please don't hesitate to contact us should you require any additional clarification before the release of the Draft Application Report and EMPr for comment.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Comments received from Me L Armstrong on 06 November 2025:</u> Dear Sir Madam The Blouvlei Action Group is a conservation group focussing on the Blouvlei in Wellington, HWC registration number HWC/NHRA S25/2025/05/09 Thank you for registering us as I&APS in the above matter. Our comment is as follows: Matters of Policy: 1. Blouvlei Action Group does not condone retro-active regularization as it encourages a build-now-pay-later mentality within the community. Matters Procedural: 1. Correspondence from Greenmined suggests that the public participation process is two-pronged and that we are but in the preliminary pre-application phase. The notice suggests however that the application has already been submitted to the decision-making authority and is in the 30 day- commenting phase. 2. There are no reports available, preliminary or otherwise. Matters Substantive: 1. Judging from photographic material provided by neighbours in the direct line of vision of the transgression, the negative impacts on the environment are high in every regard including heritage. 2. The Blouvlei is a heritage sensitive area, and the continued existence of this development will contribute to the degradation of a key space, in close proximity to landmark sites. Given all the above, we can only address the legal violation itself. We oppose rectification and request demolition of all non-compliant structures, ensuring the illegal actions are fully prosecuted.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's response on 13 November 2025:</u> Dear Lesley, Thank you for your mail and comments provided, I hereby acknowledge receipt.			
Mr & Mrs Maske Me Lesley Armstrong Mr Nick Roux Mr Rikus Mouton Mr Kevin Antonie Mr Reni Hildenbrand	Spruitriver Water Users Association – Various Water Users		
<u>Comment received from Mrs Maske on behalf of SWUA Water Users on 04 November 2025:</u> Dear Sir Madam We are residents and verified water users in the Spruit River Catchment Area. Regarding the illegal activities undertaken at Eden Farm, Upland Rd, Wellington, we hereby formally register for participation in the public participation process (PPP) concerning the application for rectification in terms of Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998), which has been submitted to the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP).			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES**TITLE, NAME AND SURNAME****AFFILIATION/KEY STAKEHOLDER STATUS****CONTACTED DATE****RESPONSE RECEIVED**

In accordance with Regulation 41 of the EIA Regulations (2014, as amended), and prior to submitting comments, we request access to the complete draft Section 24G Rectification Application Report and all supporting documents for review during the public participation process.

In line with DEADP guidelines and the NEMA Section 24 framework, we expect to have sight of the following:

1. Draft Section 24G Application Report, comprising:
 - Description of the unlawful activity (e.g., construction without prior environmental authorisation)
 - Motivation for rectification
 - Preliminary impact assessment
 - Alternatives considered
 - Mitigation measures
 - Environmental Management Programme (EMPr)
2. Specialist studies, if applicable (e.g., freshwater, heritage, botanical, traffic)
3. Site layout plans or maps detailing the location and extent of the activity
4. Proof of appointment and declaration of independence of the Environmental Assessment Practitioner (EAP)
5. Public participation plan and associated notices, including:
 - Newspaper advertisements
 - Site notices
 - Correspondence to stakeholders

We kindly await confirmation of our registration and request information on the availability and location of the required documents for our review.

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Greenmined Environmental's Response on 04 November 2025:</u> Dear Mrs. Maske, Thank you for your email. I hereby confirm receipt and confirm that you and the water users cc'ed in your mail are registered as an Interested and Affected Party (I&AP) in the public participation process for the Section 24G Rectification Application on Portion 3 of Farm 1387, Wellington. Please note that the current stage of the Public Participation Process (PPP) constitutes the registration phase as required under Regulation 8 of the Environmental Impact Assessment Regulations, 2014 (as amended). This phase is intended solely to ensure that all stakeholders are formally recorded prior to the circulation of the Draft Section 24G Application Report and Environmental Management Programme (EMPr). A second round of public participation will follow shortly, during which all registered I&APs will be invited to review and comment on the full Draft Application Report, EMPr, and specialist studies. You will receive written notification once these documents are available for public review, with clear instructions on how to access them both electronically and in hard copy. We appreciate your active participation and your commitment to upholding sound environmental governance. Your comments and observations will be duly noted and included in the application record submitted to the competent authority. If you have any other questions, please do not hesitate to contact us.			
Mr & Mrs Maske	Kleine Waterval		03 November 2025
<u>Comment received from Mrs Maske on 04 November 2025:</u> Dear Anel			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Please confirm that we, Erich and Janine Maske, of Klein Waterval, Wellington have been registered as I&APs in the process pertaining to the application for rectification on Eden. The request was sent to you yesterday. We await details of where we can peruse the application and supporting documentation, as there are only 6 days left for comment. We note that no reference number for the DEADP application was supplied on the notice. Could you rectify that as well please. <u>Greenmined Environmental's response on 04 November 2025:</u> Dear Mrs Maske, Thank you for your email. I hereby confirm receipt and confirm that you are registered as an Interested and Affected Party (I&AP) in the public participation process for the Section 24G Rectification Application on Portion 3 of Farm 1387, Wellington, as well as the water users cc'ed in previous correspondence as per attached mail. Please note that the current stage of the Public Participation Process (PPP) constitutes the registration phase as required under Regulation 8 of the Environmental Impact Assessment Regulations, 2014 (as amended). This phase is intended solely to ensure that all stakeholders are formally recorded prior to the circulation of the Draft Section 24G Application Report and Environmental Management Programme (EMPr). A second round of public participation will follow shortly, during which all registered I&APs will be invited to review and comment on the full Draft Application Report, EMPr, and specialist studies. You will receive written notification once these documents are available for public review, with clear instructions on how to access them both electronically and in hard copy. As request the reference number for this application is 14/1/1/E2/3/3/3/0915/25. We trust you find this in good order.			

LANDOWNER, SURROUNDING LANDOWNERS AND INTERESTED & AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<u>Comment received from Mrs Maske on 04 November 2025:</u> Dear Anel Thank you for your explanation regarding application 14/1/1/E2/3/3/3/0915/25. The management of this ppp however remains confusing. What you are suggesting in your explanation does not align with what the NOTICE says, or with what I understand to be correct in processes of this nature. The NOTICE suggests a 30 day commenting period. It is not correct that Interested and Affected Parties (I&APs) only see the Section 24G application and supporting documents after the initial 30-day commenting period. I have never heard of a first-phase public participation which involves nothing more than registration for comment in a second phase. The Process for a 24 G is that public participation must include access to relevant documentation during the initial notice period. At best it is not good practice to issue a notice without making relevant documents available and only share them in a second round. More realistically it is not reflective of the relevant laws to do that. The Section 24G Fine Regulations and associated EIA Regulations (2014) require that public participation be conducted in line with Chapter 6 of the EIA Regulations, which I have already shared with you. These regulations require that, access to draft report and supporting documents are required in the 30 day commenting period. Even in the event that Greenmined thought it would be more efficient to depart from best practice, there is nothing in the NOTICE to suggest or explain this. I&AP's have no idea that their first opportunity to comment on the application with the benefit of supporting documents, will be in the second round. Your suggestion to me that the first 30 days is merely for registration is incorrect in terms of the regulations and ambiguous when read with your notice; the pertinent parts of which are highlighted as follows: This notice forms part of the 30-day public participation process, which runs from 9 October 2025 to 10 November 2025. Interested and Affected Parties (I&APs) are invited to register and comment on the application. To register as an I&AP and be kept informed of future opportunities to comment, please provide your name, contact details, and interest in the matter in writing to comments@greenmined.co.za.			

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By taking part in this process, you hereby consent, in terms of the Protection of Personal Information Act 4 of 2013 (“POPIA”), to the lawful processing of your personal information by Greenmined, which personal information may be used as part of documentation pertaining to the Environmental Authorisation application process. By providing your details and by taking part in his process you authorise such information to be shared for the purpose of this application. Should you have any queries or wish to submit comments, please ensure they are received by no later than Monday, 10 November 2025. The suggestion that a second round of participation can retroactively satisfy participation requirements, mirrors the idea that prompted the application in the first place, namely that it is ok to transgress and seek post facto rectification. I must remind you that as the EAP in this matter you are expected to ensure the rights of all interested parties, not just the applicant. In light of all the above I respectfully request confirmation with all registered I&APs in copy, that the application will be readvertised at a time when the application and all the supporting documents are available. <u>Greenmined Environmental’s response on 06 November 2025:</u> Dear Dr Maske, Thank you for your detailed note and for registering as an I&AP for the Section 24G rectification on Portion 3 of Farm 1387, Wellington. We appreciate your attentiveness and want to confirm the public participation pathway and your opportunities to comment on the full documentation. 1. What Regulation 8 requires (pre-application PPP): Regulation 8 of the Section 24G Fine Regulations (GN R.698 of 20 July 2017) requires a pre-application advertisement and the opening of an I&AP register, with at least 20 calendar days for parties to register and/or submit preliminary comments and contact details. This step is to ensure that all stakeholders are formally recorded before the full draft application is circulated for review. For this project we: Placed the preliminary newspaper notice and on-site/municipal notices, and			

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- Kept the register open for 30 days (exceeding the 20-day minimum) to maximize inclusivity. These steps align with Regulation 8 and were scheduled and approved as the first stage of the PPP. The Department-approved Project Schedule shows this two-stage approach: (i) pre-application advert and I&AP register, then (ii) a separate 30-day public review of the Draft 24G Application & Assessment Report and EMPr. 2. What happens next (Chapter 6 PPP on the Draft): In line with Chapter 6 of the EIA Regulations, 2014 (as amended), the second round will provide a minimum 30-day public review period of the Draft Section 24G Application & Assessment Report, EMPr and specialist annexures. As soon as the Draft is ready, all registered I&APs (including you) will receive: - A Notice of Availability; - The electronic link to the full set of documents This “two-stage” PPP (pre-application registration followed by full-draft review) is the exact sequence captured in the Department-approved Project Schedule for this case. 3. Reference number and contact - DEA&DP reference: 14/1/1/E2/3/3/3/0915/25 - You are confirmed on the I&AP register and will receive all future notifications. We trust this clarifies that you will have a full opportunity to review all documents and submit substantive, document-informed comments during the formal draft review phase.			

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<u>Response received from Mrs Maske on 06 November 2025:</u> Dear Anel. Thank you for the full view of the legislation and confirmation that I am a registered I&AP. FYI and future reference: The wording of your notice as placed at various information points (nothing visible near the subject property) suggests we are in the second phase of ppp, and there is no reference to its pre-application (preliminary) status, as described in your email. There is also no statement of intent to submit an application, rather a statement of fait accompli: "an application for rectification in terms of Section 24G of the National Environmental Management Act, 1998 (Act No. 107 of 1998) has been submitted to the Western Cape Department of Environmental Affairs and Development Planning (DEA&DP)." There seems also to be no preliminary report accompanying the what is now understood to be the preliminary notice. I believe that, according to regulation 24 G, a preliminary report is mandatory. Without one it is not possible for I&APs to oblige you with the comment invited in the notice.			
Mr J Naude	GH Security (Pty) Ltd		13 October 2025
<u>Comment received from Mr Naude on 13 October 2025:</u> Good day, With this letter I wish to register as an Interested and Affected Paty (I&AP) for any future opportunities for Security Services.			

SUMMARY OF PUBLIC PARTICIPATION PROCESS

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

- ◆ telephonic discussions;
- ◆ direct notification with notification mails;
- ◆ placement of site notices;
- ◆ the placement of an advertisement in the Paarl Post newspaper.

Also refer to Appendix F1 and Appendix F2 for the proof of public participation conducted up to 10 November 2025.

-END OF COMMENTS AND RESPONSE REPORT-