

DMRE REF: WC 30/5/1/1/2/10375 PR

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21 October 2021

Dear Ms Smit

RE: AIR QUALITY STATEMENT IN RESPONSE TO COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR LISTED ACTIVITIES ASSOCIATED WITH A PROSPECTING RIGHT ON PORTION 3 OF THE FARM WELVERDIEND NO. 511, VANRHYNSDORP, WESTERN CAPE PROVINCE, AS RECEIVED FROM THE DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING.

Enviroworks (Pty) Ltd has been appointed by Greenmined Environmental (Pty) Ltd (Consultant) to compile a statement in support of a response to address a specific comment on the draft Basic Assessment Report for listed activities associated with a prospecting right on Portion 3 of the Farm Welverdiend No. 511, Vanrhynsdorp, Western Cape Province, as received from the Department of Environmental Affairs and Development Planning (DEA&DP) (comment dated 15 October 2021).

PROJECT DESCRIPTION:

The proposed prospecting footprint is approximately 70.077 ha over the property: Portion 3 of the Farm Welverdiend No. 511. Prospecting will be performed over a period of one (1) week over the entire prospecting footprint. Prospecting will involve non-invasive surface exploration to limit the environmental footprint experienced within the prospecting area and generally leaves little to no evidence of exploration activity as well.

The non-invasive activities will consist out of the following:

- Traversing the entire farm, and/or identified target areas on foot
- Geological mapping and characterisation of the surface material and mineralization
- Geotechnical and structural orientation mapping
- Collection of rock samples (loose) which is representative of the mineralization
- Verification of all relevant site, geological and mining data

The aim of the exploration activity is to verify the geology, historical data and any and all site data for the project, as well as to produce a most up-to-date current surface geological and geotechnical map of the mineralised zone.

The proposed project will not require any additional electricity connections. No diesel storage will be required for the prospecting phase.

Access to the proposed prospecting area will be via the N7, making use of the existing internal/haul roads to access the prospecting area.

The land surface rights of this application area are owned by the applicant.

Land access and site visit will be communicated prior to commencement of activities.

Access to the proposed prospecting area will be via the N7, making use only of the existing internal/haul roads to access the prospecting area. No 'off-road' driving will be done.

The prospecting activities will be done by a maximum of 2 Light Duty Vehicles.

LOCATION:

The location of the prospecting right area is illustrated in the map below (Figure 1).

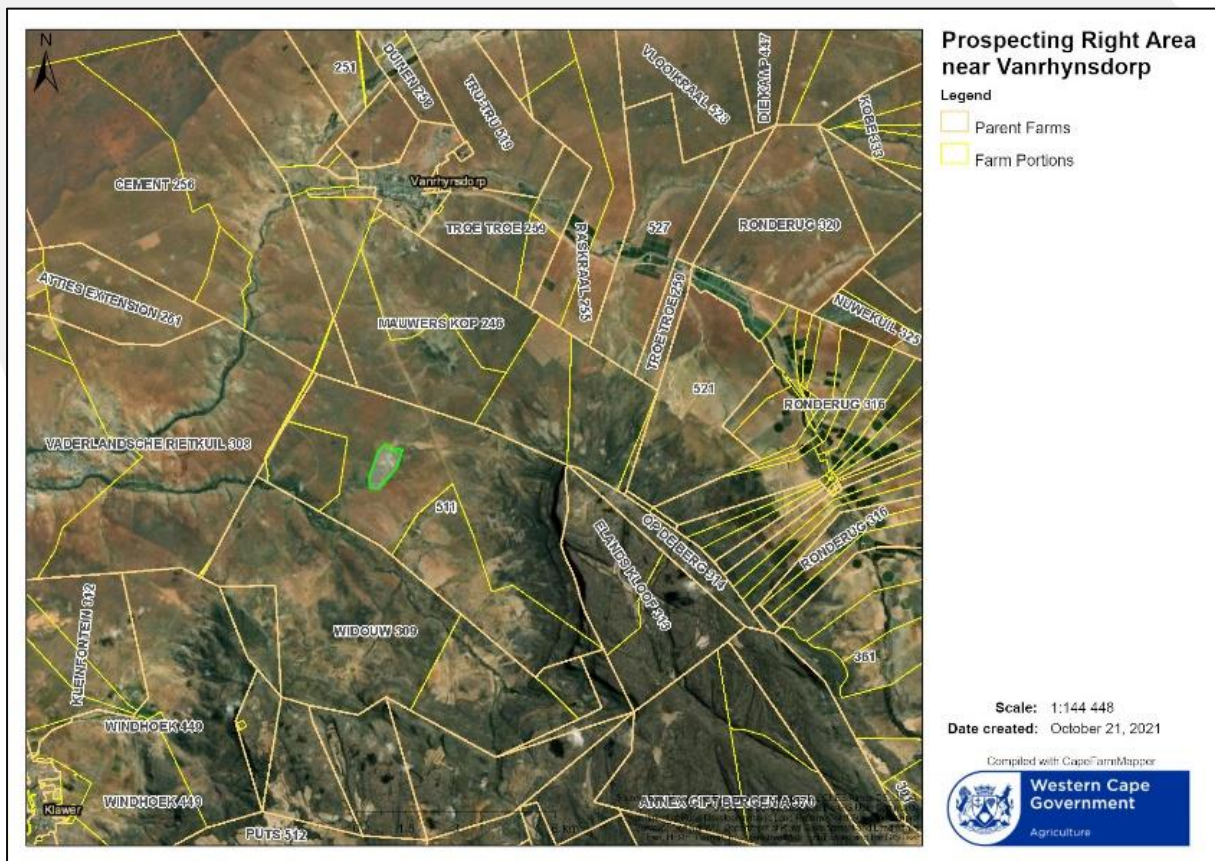


Figure 1 Locality map of the proposed prospecting right on Portion 3 of the Farm Welverdiend No. 511

COMMENT FROM DEA&DP:

Today's Impact | Tomorrow's Legacy

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“5.1. It is noted in the Draft BAR that dust pollution is predicted to have a negligible impact as the proposed prospecting activities are deemed to be non-invasive. Dust may be created from vehicles traversing the prospecting area and this must be monitored to not cause a nuisance. Dust generated from vehicles must comply with the National Dust Control Regulations (GN No. R. 827 of 1 November 2013) promulgated in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health.”

SPECIALIST STATEMENT:

Considering the specific project description above (as provided to the specialist by the Consultant), the rural receiving environment and low population density in the immediate surrounds, it is not anticipated that the prospecting activities will generate a significant dust nuisance from driving the two Light Duty Vehicles during the one week of prospecting work on unpaved existing access roads¹.

Further to this, fugitive dust emissions due to vehicles driving on unpaved roads are often limited close to the source², and temporary in nature (being restricted to the one week of prospecting).


RECOMMENDATIONS:

- It is recommended that the Consultant and the Applicant take note of the following comments from DEA&DP:
 - *“5.3. Air emission impacts have been noted to have a negligible impact. All potential air pollutants on-site must be monitored and if causing significant emissions, must be strictly managed as per the recommendations stipulated in the EMPr.*
 - *5.4. Kindly be advised that the Air Quality Officer for Matzikama Municipality must also be engaged with regarding the application. The designated official is Ms Thesme van Zyl and can be contacted on telephone (027) 201 3351 or on e-mail: thesme@matzikama.gov.za.*
 - *6. The applicant is reminded of its “general duty of care towards the environment” as prescribed in section 28 of the NEMA, 1998 which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment”.*
- A Complaints register should be kept on site during the prospecting activities. If any complaints regarding dust nuisance are received, additional dust control and monitoring measures should be investigated and implemented.
- Reduce driving speed of vehicles during prospecting, as increased vehicle speeds result in increased quantities of fugitive dust³.

¹ This statement is based on the project information provided to the Specialist by the Consultant. Should any of the details regarding the prospecting description change: the potential environmental impacts should be evaluated, appropriate specialist studies should be conducted if necessary, the significance of potential environmental impacts should be determined, mitigation measures should be suggested and appropriate procedures should be followed to authorize the prospecting works.

² Rayten Engineering Solutions. 2018. CABANGA ENVIRONMENTAL - KANAKIES MINE AIR QUALITY IMPACT ASSESSMENT. Report Number: CE-01-106-005-00

³ Barnes, D. and Connor, B., 2014. *Managing dust on unpaved roads and airports*. Alaska University Transportation Center.

	Capacity	Name	Signature	Date
Specialist:	Air Quality Specialist (4.5 years) IAIAsa Reg No: 5614 SACNASP Reg No: <i>Cert Sci Nat</i> 119857 EAPASA: <i>EAP Reg</i> : 2020/1751	Liketso A. Tsetetsi		21/10/2021

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