

**PARAMON (PTY) LTD**

**PROSPECTING RIGHT FOR MARBLE (DIMENSION STONE),  
LIMESTONE, DIMENSION STONE (GENERAL) ON A  
PORTION OF PORTION 3 AND THE REMAINING EXTENT OF  
THE FARM WELVERDIEND NO 511 MAGISTERIAL DISTRICT  
OF VANRHYNSDORP WESTERN CAPE PROVINCE**

**COMMENTS AND RESPONSE REPORT**

**REF NO: WC 30/5/1/2/2/10375 PR**

**AUGUST 2021**



## NOTIFICATION OF STAKEHOLDERS AND I&AP'S OF A MINING PERMIT APPLICATION

COMMENTING PERIOD: 13 AUGUST – 13 SEPTEMBER 2021

Paramon (Pty) Ltd (hereafter referred to as the applicant) applied for a prospecting right for Marble (Dimension Stone), Limestone, Dimension Stone (General) on a portion of Portion 3 and the Remaining Extent of the Farm Welverdiend No 511 Magisterial District of Vanrhynsdorp Western Cape Province.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Ismat Adams	CapeNature	13 August 2021	23 August 2021
<p>Please register me as I&amp;AP for future reference, please use the attached contact details for notifications. See also attached our application document requirements. Please send on the DBAR and all relevant documents, it is not available on the website as per the notification, unless I have missed it.</p>			
<p>Response from GM</p> <p>Good day Mr Adams, I trust this email finds you well, The DBAR will be available from the 13th of September, we are currently in initial PPP, please see below as per the BID. Please contact Sonette Smit at the contact details as presented in the letterhead or at <a href="mailto:sonette.s@greenmined.co.za">sonette.s@greenmined.co.za</a> through any means should you need more information, have concerns or comments that need to be considered or if you want to be registered as an interested and / or affected party and would like to receive a copy of the Draft Basic Assessment Report (DBAR). If we do not receive any comments from you within 30 days of receipt of this notice (on or before 13 September 2021), it will be accepted that you do not have any objections / comments with regard to the project. You are registered on this project and will receive notice of the availability of the DBAR as soon as it is available for comments. We trust that you find the above in order, please do not hesitate to contact me should require any further clarity.</p>			

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>Cape Nature would like to thank you for the opportunity to comment on this application. Herewith our revised comments. These comments replace those made in our letter dated 08 September 2021.</p> <p>1. Based on the information in the BID it is understood that this prospecting application is for non-invasive prospecting. It is understood that the entire prospecting activity on site will comprise traversing the farm on foot and collecting rock samples for analysis. It is understood that this method will have negligible impact on biodiversity. We object to the prospecting application considering that prospecting applications ultimately lead to mining applications, and considering that the proposed prospecting area targets an area that has bearing on the Greater Cederberg Biodiversity Corridor and has been identified as an area for protected area expansion via proactive stewardship.</p> <p>2. Note that should invasive prospecting after this activity be required, that we will object to such an application as per point 1, and considering that the prospecting area is highly sensitive from a biodiversity perspective as the majority of the area is ESA, contains watercourses as well as CBA areas. Furthermore, part of the area contains critically endangered Klawer Sandy Shrubland.</p> <p>3. Although we understand that the impacts of prospecting are usually less than that of mining, prospecting often leads to mining and we do not support mining activities in the prospecting application area, as the environmental damage to ecological pattern and process is often irreparable, as the receiving environment is unlikely to be rehabilitated to its ecological state prior to mining.</p> <p>Cape Nature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>			
<p>Response from GM</p> <p>We thank you for your valuable participation and submitting comments,</p> <p>Please note that we will only include the revised comments in our report in order to avoid confusion. You will be notified of the availability of the DBAR as soon as the BID comment period closed.</p> <p>We trust you find this in order and we look forward to your future participation in this project.</p>			
Mr Ryno Pienaar	Cape West Coast Biosphere Reserve	13 August 2021	No Comments Received
Me N Lutendo	Department of Agriculture Land Reform, Rural Development	13 August 2021	13 August 2021

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Me Adri LaMeyer	Department of Environmental Affairs and Development Planning	13 August 2021	13 August 2021
<p>Dear Marlene and Sonette,</p> <p>I hope you are well. Thank you for the notification and BID. Please register the Department of Environmental Affairs and Development Planning as a commenting authority for the BA application. You may add me as the Department's contact person for the application.</p> <p>Would you please notify me when the Draft BAR is released for public consultation please?</p> <p>Just for clarity – I note that only loose samples will be collected. Please confirm that no drilling or trenching will be required</p>			
<p>Response from GM</p> <p>Hi Adri,</p> <p>We are very well thank you for asking,</p> <p>We will let you know as soon as die DBAR is available for comments.</p> <p>Correct, only non-invasive prospecting is planned at this stage.</p>			
Mr Solly Fourie	Department of Economic Development and Tourism	13 August 2021	No Comments Received
Mr Jan Smit	Department of Agriculture - Head Office	13 August 2021	No Comments Received
Me Candice van Reenen	Department of Labour	13 August 2021	No Comments Received

<b>STAKEHOLDERS</b>			
<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Lubabalo Mbekeni	Department of Rural Development and Land Reform	13 August 2021	No Comments Received
Mr R Khan	Department of Water and Sanitation	13 August 2021	No Comments Received
Mr Toni Parkes	Eskom	13 August 2021	No Comments Received
Me Waseefa Dhansay	Heritage Western Cape	13 August 2021	No Comments Received
Mr Mark Owies	Matzikama Local Municipality	13 August 2021	No Comments Received
Me Jacqui Gooch	Department of Roads and Public Works	13 August 2021	No Comments Received
Ms Nicole Abrahams	Sanral	13 August 2021	No Comments Received
Cllr Andreas Sindiyamba	Matzikama Local Municipality Ward 7	13 August 2021	No Comments Received

<b>STAKEHOLDERS</b>			
<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Me Doretha Kotze	West Coast District Municipality	13 August 2021	23 August 2021
Me Doretha Kotze requested DBAR			
Greenmined Environmental: We will let you know as soon as the DBAR is available for comments.			
SAHRIS on-line system	SAHRA	13 August 2021	No Comments Received

<b>LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES</b>			
<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Van der Westhuizen	WELVERDIEND - Land Owner	13 August 2021	16 August 2021

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>U e-pos aan Mnr Cobus van der Westhuizen is aan my oorhandig vir aandag.</p> <p>Mnr Van der Westhuizen is die eienaar van die plaas waar aansoek gedoen word vir die beoogde prospekter permit.</p> <p>Mnr Van der Westhuizen het alreeds tydens die besoek van die verteenwoordiger van Paramon aan hom te kenne gegee dat hy gekant is teen enige verdere myn/prospekterregte op sy eiendom. My instruksies is dus om enige sodanige aansoek te opponeer.</p> <p>Ek sal dit waardeer indien u my van die kontak besonderhede van die persoon by Paramon wie hierdie aangeleentheid hanteer, sal voorsien ten einde direk met hom kontak te maak.</p> <p>Translated for review purposes:  Your e-mail to Mr Cobus van der Westhuizen has been referred to me for attention.  Mr Van der Westhuizen is the owner of the farm where the proposed prospecting permit is being applied for.</p> <p>Mr Van der Westhuizen had already indicated to him during the visit of the representative of Paramon that he was opposed to any further mining / prospecting rights on his property. My instructions are therefore to oppose any such application.</p> <p>I would appreciate it if you would provide me with the contact details of the person at Paramon who is handling this matter in order to contact him directly.</p>			
<p>Response from GM</p> <p>Your email dated 16 August 2021 has reference.</p> <p>We have consulted with the applicant regarding your objection has and they have decided to remove from the application area.</p> <p>We will notify you as soon as the updated documents are available for comments should you have any further comments in this regard</p>			
Cape Lime	Surrounding Land Owner	13 August 2021	No Comments Received

**LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Nawelskloof Boerdery	Surrounding Land Owner	13 August 2021	No Comments Received
Mr Nicolaas Helme	Surrounding Land Owner	13 August 2021	No Comments Received
Mr Nicolaas Albertus Heyns	Surrounding Land Owner	13 August 2021	No Comments Received
Nuwedam Boerdery	Surrounding Land Owner	13 August 2021	No Comments Received
Oracle Trust	Surrounding Land Owner	13 August 2021	No Comments Received
Mr Sybrand van der Westhuizen	Surrounding Land Owner	13 August 2021	No Comments Received
Mr Teubes	Surrounding Land Owner	13 August 2021	No Comments Received



**LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Vleikraal Beleggings Trust	Surrounding Land Owner	13 August 2021	No Comments Received
Mr Willa van Niekerk	Surrounding Land Owner	13 August 2021	No Comments Received

**SUMMARY OF INITIAL PUBLIC PARTICIPATION PROCESS**

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

- telephonic discussions;
- direct communication with background information documents (email);
- placement of on-site notices at the entrance to the farm, one at the local Spar in town, one at the public library and one at Vanrhynsdorp Magistrates Court;
- advertisement in Ons Kontrei newspaper on 30 July 2021

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

## NOTIFICATION OF STAKEHOLDERS AND I&AP'S OF A MINING PERMIT APPLICATION

*COMMENTING PERIOD: 14 SEPTEMBER – 15 OCTOBER 2021*

Paramon (Pty) Ltd (hereafter referred to as the applicant) applied for a prospecting right for Marble (Dimension Stone), Limestone, Dimension Stone (General) on a portion of Portion 3 and the Remaining Extent of the Farm Welverdiend No 511 Magisterial District of Vanrhynsdorp Western Cape Province.

The proposed prospecting footprint applied for was approximately 35 km<sup>2</sup> over portion 3 and the remaining extent of the farm Welverdiend no 511 magisterial district of Vanrhynsdorp Western Cape province. However, after consultation with the land owners the remaining extent of the farm Welverdiend no 511 magisterial district of Vanrhynsdorp Western Cape province was removed from this application and will only continue on portion 3 of the farm Welverdiend no 511 magisterial district of Vanrhynsdorp Western Cape province in which case the land owner is the applicant.

The proposed prospecting footprint will now be reduced to approximately 70.077 ha over the above mentioned property and will be performed over a period of one (1) week over the entire prospecting period. 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.

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Ismat Adams	CapeNature	14 September 2021	12 October 2021
Response received from CapeNature:  Cape Nature would like to thank you for the opportunity to comment on this application. Herewith our revised comments. These comments replace those made in our letter dated 08 September 2021.  1.It is understood that this prospecting application is for non-invasive prospecting. It is understood that the entire prospecting activity on site will comprise traversing the farm on foot and collecting rock samples for analysis, and that vehicles will not be used to drive through vegetation. It is understood that this method will have negligible impact on biodiversity.			

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>2.We object to the prospecting application considering that prospecting applications ultimately lead to mining applications and considering that the proposed prospecting area targets an area that has bearing on the Greater Cederberg Biodiversity Corridor and has been identified as an area for protected area expansion via proactive stewardship.</p> <p>3.Note that should invasive prospecting after this activity be required, that we will object to such an application as per point 1, and considering that the prospecting area is highly sensitive from a biodiversity perspective as the majority of the area is ESA, contains watercourses as well as CBA areas. Furthermore, part of the area contains critically endangered Klaver Sandy Shrubland.</p> <p>4.Although we understand that the impacts of prospecting are usually less than that of mining, prospecting often leads to mining and we do not support mining activities in the prospecting application area, as the environmental damage to ecological pattern and process is often irreparable, as the receiving environment is unlikely to be rehabilitated to its ecological state prior to mining.</p> <p>Cape Nature reserves the right to revise initial comments and request further information based on any additional information that may be received.</p>			
<p>Response from Greenmined Environmental:</p> <p>We thank you for your valuable participation and submitting comments,</p> <p>We take note of your objection sent 12 October 2021, it will be included in our FBAR and submitted to DMRE for their decision making. It will be recommended based on the comments received by you that any future invasive activities and or mining should be limited to existing mining and already disturbed areas in order to prevent the loss of natural vegetation or disturbance to water courses.</p> <p>I trust you find this in order,</p>			
Head of Department	Cape West Coast Biosphere Reserve	14 September 2021	No Comments Received
Me N Lutendo	Department of Agriculture Land Reform, Rural Development	14 September 2021	No Comments Received
Me Adri LaMeyer	Department of Environmental Affairs and Development Planning	14 September 2021	15 October 2021

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
1.	Directorate: Development Management (Region 1)		
1.1.	Based on the information contained in the Draft BAR, it appears that a screening tool report was generated for the proposed prospecting area. Please note that if the screening tool report was not provided with the application for environmental authorisation, it must be included with the Final BAR to be submitted to the competent authority.		
1.2.	In addition, in accordance with the “Procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act, 1998, when applying for environmental authorisation (“the Protocols”) published in Government Notice (“GN”) No. 320 of 20 March 2020 and GN No. 1150 of 30 October 2020, a site sensitivity verification report is required. The site sensitivity verification report was not included in the Draft BAR and must therefore be appended to the Final BAR.		
1.3.	It is noted that “Heritage Western Cape will be contacted for their perusal and commenting.” Please note that comments from Heritage Western Cape (“HWC”) must be included in the Final BAR. Note that should HWC request any specialist assessments, a Revised Draft BAR with the required specialist assessment(s) will need to be circulated to registered interested and affected parties (“I&APs”) for commenting purposes.		
1.4.	Proof of the public participation process conducted must be included in the Final BAR.		
1.5.	The following comments regarding the EMPr (Part B of the Draft BAR) are offered:		
1.5.1.	It is advised that the EMPr be dated and contain a cover page, which includes the property description and the competent authority’s reference number, since the EMPr must be kept on the proposed prospecting area.		
1.5.2.	All areas outside of the prospecting area must be regarded as “no-go” areas.		

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			<p>1.5.3. Appropriate penalties for transgressions should be stipulated in the EMPr.</p> <p>2. Directorate: Pollution and Chemicals Management</p> <p>2.1. It is noted that prospecting activities involve non-invasive surface exploration only. The potential pollution related impacts are therefore anticipated to be limited, on the assumption that activities are restricted as indicated, and do not include drilling or equipment being brought onto site.</p> <p>2.2. Notwithstanding the above, it is nonetheless imperative that where vehicles are used to traverse the prospecting area, that refuelling is undertaken off-site, or within the yard of the existing mine on-site, in an area that makes use of unplasticized polyvinyl chloride lining and drip trays.</p> <p>2.3. The presence of a non-perennial watercourse on-site is noted. Page 58 of the Draft BAR states the following: “The proposed site falls within the Olifants/Doorn Water Management Area, in the E33G quaternary catchment area. According to the National Freshwater Ecosystem Priority Areas (NFEPAs) map as presented by SANBI, a NFEPAs river intersects with the proposed prospecting footprint falls but <i>is partially modified in which a large loss of natural habitat, biota and basic ecosystem function have occurred. The conservation status of the area will be further assessed and discussed during the Basic Assessment process of this application.</i>” Page 107 further states that “<i>The conservation status of the area will be further assessed and discussed during the EIA process of this application.</i>”</p> <p>2.4. Please clarify if a suitably qualified and experienced freshwater specialist provided input to the assessment or to confirm the EAP’s characterisation of the identified river.</p> <p>2.5. The above paragraph indicates that the conservation status of the area will be further assessed during the basic assessment or environmental impact assessment (“EIA”) process of this application, although it is not apparent that this potential impact has been assessed in any detail within the application.</p>

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2.6.			The EMPr omits any reference to impact management measures or outcomes relating to protection of water resources, despite the prospecting area including a defined and mapped watercourse.
2.7.			It is recommended that the watercourse and a suitable buffer area on either side is excluded from prospecting activities. The potential identification of future mining activities across the river corridor is not supported.
2.8.			Pages 121 and 126 of the EMPr refer to section 30 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) ("NEMA") in terms of waste management. Please amend the EMPr to reference section 30 of the NEMA, 1998 in terms of the control of incidents and any accidental release of a hazardous substance. In the event of a significant spill or leak of hazardous substances (e.g. petrol, diesel, etc.) used during the proposed activities, such an incident(s) must be reported to the relevant authorities, including the Directorate: Pollution and Chemicals Management, in accordance with section 30 of the NEMA, 1998.
3.			Directorate: Waste Management
3.1.			As clearly indicated in the Draft BAR, the proposed prospecting activities are unlikely to pose any significant environmental risks, as only non-invasive surface exploration will be undertaken, the duration of prospecting is proposed to be very short, and the original area to be surveyed has been reduced from 35km <sup>2</sup> to 70.1ha. No excavation or core drilling is proposed.
3.2.			No waste management activity listed in terms of GN No. 921 of 29 November 2013 (as amended), promulgated in terms of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) will be triggered. This Directorate has no further comments on the Draft BAR.
4.			Directorate: Development Facilitation
4.1.			Per paragraph 2.3. above, this Directorate requires clarity on the statement in the Draft BAR pertaining to specialist assessments that will be

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TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
			<p>undertaken to assess the hydrology and surface water resources of the prospecting area. It is stated on pages 6, 58, 77, 93 and 107 of the Draft BAR that the conservation status of the area will be further assessed and discussed during the basic process/ EIA process of the application. Please note that specialist assessments must be undertaken <u>prior</u> to the release of a Draft BAR for public participation. Should any surface water assessment be undertaken for the prospecting right application, then said assessment must be made available to registered I&amp;APs via the release of a Revised Draft BAR. This Directorate further requires clarity whether the EAP is referring to specialist assessments that will be undertaken as part of a (separate) EIA process that will be lodged for a mining right or permit application should the results of prospecting activities be deemed favourable.</p> <p>4.2. The EAP is advised that final comment from HWC must be obtained prior to the submission of the Final BAR to the competent authority.</p> <p>5. Directorate: Air Quality Management</p> <p>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.</p> <p>5.2. It is noted that noise generated by the proposed activities will have a negligible impact. It is expected that any potential noise generated on-site by vehicles must comply with the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013.</p> <p>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</p>

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<p>emissions, must be strictly managed as per the recommendations stipulated in the EMPr.</p> <p>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 [REDACTED] and can be contacted on telephone [REDACTED] or on e-mail: <a href="mailto:thesme@matzikama.gov.za">thesme@matzikama.gov.za</a>.</p> <p>5.5. The applicant is reminded of its “<i>general duty of care towards the environment</i>” as prescribed in section 28 of the NEMA, 1998 which states that “<i>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.</i>”</p> <p>Please direct all enquiries to the officials indicated in this correspondence should you require any clarity on any of the comments provided.</p> <p>The Department reserves the right to revise or withdraw its comments and request further information based on any new information received.</p>			
<p>The above matter as well as letter received from you dated 15 October 2021 refers. Please see responses to your comments listed below:</p> <ul style="list-style-type: none"> <li>■ Comment noted, this report has been attached to the FBAR as Appendix M</li> <li>■ Comment noted, this report has been attached to the FBAR as Appendix N</li> <li>■ Comment was requested form HWC but not yet received by the printing of this document, as soon as comments are received it will be forwarded to DMRE</li> </ul>			



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			<ul style="list-style-type: none"> <li>■ Comment noted, this report has been attached to the FBAR as Appendix G1&amp;2</li> <li>■ Comment noted this will be implemented and adhered to</li> <li>■ Comment noted this will be implemented and adhered to, please also refer to page 21 and 39 of the Draft BAR where it is clearly stated that “All activities will be contained within the boundaries of the site”</li> <li>■ Comment noted this will be implemented and adhered to</li> <li>■ Comment noted this will be implemented and adhered to</li> <li>■ Invasive prospecting was planned during the initial phases of the project but excluded during the EIA basic process/ EIA process of the application, therefore no further specialist assessments were required to be undertaken.</li> <li>■ With reference to point 2.3 -2.8) As per the Freshwater Statement compiled by Enviroworks dated October 2021 (attached as appendix O2 to FBAR) – Considering the specific project description above (as provided to the specialist by the Consultant) and the non-invasive prospecting method proposed, it is not anticipated that the prospecting activities will generate a noteworthy impact on the non-perennial watercourses (please refer to Appendix O2 Figure 2) during the one week of prospecting work. The prospecting will involve driving vehicles on existing unpaved access roads and traversing the area on foot, while also collecting loose surface rock samples. Even though this statement does not constitute a full specialist assessment and characterization of the non-perennial watercourses, it is the opinion of the specialist, that this detailed freshwater study will not be necessary at this stage, considering the current prospecting description. Even though this statement does not constitute a full specialist assessment and characterization of the non-perennial watercourses, it is the opinion of the specialist, that this detailed freshwater study will not be necessary at this stage, considering the current prospecting description. A portion of the non-perennial watercourse has been transformed by</li> </ul>

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			<p>an old marble mine, just downstream of the artificial dam. There is also evidence of past mining and disturbance in the watercourse downstream from the old mine. This was confirmed by a site visit on 07 October 2021. It should be noted that the purpose of this site visit did not include assessing the watercourses over the entire prospecting right, nor did it include assessing potential impacts of the proposed prospecting.</p> <p>Watercourses are nevertheless important ecological features in the landscape, therefore:</p> <ul style="list-style-type: none"> <li>○ Should this prospecting description change, the need for a more detailed freshwater study should be re-evaluated.</li> <li>○ Should the prospecting right be followed by a mining permit/mining application, it is recommended that a more detailed freshwater study be commissioned.</li> </ul> <p>It is recommended that disturbance and damage to vegetation and the soil surface or channel morphology be avoided in the mapped (see appendix MO - Figure 2) non-perennial watercourses (this includes their bed and banks).</p> <p>Even though it is not anticipated that the current planned prospecting activities will have a noteworthy impact on watercourses, it is noted that the Department will not support the potential identification of future mining activities across the river corridor.</p> <p>The applicant should be aware that prospecting within the watercourse corridor does not mean that the Department will support potential identification of future mining activities across the river corridor.</p> <p>Should this prospecting description change, the need for a more detailed freshwater study should be re-evaluated.</p> <p>Should the prospecting right be followed by a mining permit/mining application, it is recommended that a more detailed freshwater study be commissioned. This study should, amongst the other requirements of a freshwater specialist study, recommend a suitable buffer for watercourses.</p>

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<p>It is recommended that the Consultant and the Applicant take note of the following comments from DEA&amp;DP:</p> <p>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”.</p> <ul style="list-style-type: none"> <li>■ Comment noted, this has been amended in to the EMPr</li> <li>■ Comment noted and I thank you for taking part in the commenting process.</li> <li>■ Invasive prospecting was planned during the initial phases of the project but excluded during the EIA basic process/ EIA process of the application, therefore no further specialist assessments were required to be undertaken.</li> <li>■ Comment was requested form HWC but not yet received by the printing of this document, as soon as comments are received it will be forwarded to DMRE</li> <li>■ Comment noted this will be implemented and adhered to</li> <li>■ As per the Air Quality Statement compiled by Enviroworks dated October 2021 (attached as appendix O1 to FBAR) - 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 roads. Further to this, fugitive dust emissions due to vehicles driving</li> </ul>			

STAKEHOLDERS			
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<p>on unpaved roads are often limited close to the source, and temporary in nature (being restricted to the one week of prospecting).</p> <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ Reduce driving speed of vehicles during prospecting, as increased vehicle speeds result in increased quantities of fugitive dust.</li> </ul> <ul style="list-style-type: none"> <li>■ Comment noted this will be implemented and adhered to</li> <li>■ Comment noted this will be implemented and adhered to</li> <li>■ Comment was requested from Matzikama Municipality - Air Quality Officer but not yet received by the printing of this document, as soon as comments are received it will be forwarded to DMRE</li> <li>■ Comment noted this will be implemented and adhered to</li> </ul> <p>All comments received for you as well as our response will be incorporated in the Final Basic Assessment Report to be submitted to DMRE for their consideration.</p> <p>We trust you will find this in order. Please do not hesitate to contact us in the event of any uncertainties</p>			
Mr Solly Fourie	Department of Economic Development and Tourism	14 September 2021	No Comments Received
Mr Jan Smit	Department of Agriculture - Head Office	14 September 2021	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Me Candice van Reenen	Department of Labour	14 September 2021	No Comments Received
Mr Lubabalo Mbekeni	Department of Rural Development and Land Reform	14 September 2021	No Comments Received
Mr R Khan	Department of Water and Sanitation	14 September 2021	16 September 2021
<p>Response received from Department of Water and Sanitation:</p> <p>Good Day</p> <p>We have received a request for comment on the attached application for a prospective mining in Vanrhynsdorp area, as this Department we would like to do a site visit to where this prospective mining will occur or take place, we would like to come out on site on the 22 September 2021 @12h00 in the afternoon, kindly confirm if this is all in order for you.</p>			
<p>Response from Greenmined Environmental:</p> <p>Good day Sipiwo,</p> <p>Mr Tristan Stuck will accompany you to site, please see his contact details below.</p>			
<p>Response received from Department of Water and Sanitation:</p> <p>Reference is made to the above-mentioned document dated 14 September 2021 with a Reference No: WC 30/5/1/1/2/10375 PR. The Department has no objections at this stage to the prospecting right application submitted to DMR by Paramon (Pty) Ltd subject to compliance to the following conditions:</p>			

<b>STAKEHOLDERS</b>			
<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
			<p>1.Any development within 1:100-year floodline or within the riparian habitat constitutes a water use licence in terms of section 21 (c) and (i) of the National Water Act, 1998 (Act 36 of 1998) and will require authorisation before any development may commence.</p> <p>2.If any portable toilets would be used on-site during construction and/or operational phase of the development; such toilet facilities must be located outside of the 1:100-year floodline and must be regularly emptied at a municipal wastewater treatment works.</p> <p>3.Solid and chemical waste generated from construction and operational phases of the development must be kept away from drainage line.</p> <p>4.No abstraction of surface water or ground water may take place without the prior authorization from this Department unless it is a Schedule 1 use or an Existing Lawful Use.</p> <p>5. Where solid waste disposal is to take place on site, ensure that only non-toxic materials which have no risk of polluting the groundwater, are buried in designated approved areas at acceptable depths below ground level.</p> <p>6. No surface, ground or storm water may be polluted as a result of any activities on the site.</p> <p>7. The person who owns, controls, occupies, or uses the land in question is responsible for taking measures to prevent any occurrence of pollution to water resources.</p> <p>8. Rehabilitation plan must be formulated and submitted to this Department for comments. If the rehabilitation of the site will include the storage of water, authorization will be required before any water is stored.</p> <p>9.The rehabilitation of the site must ensure that the final condition of the site is environmentally acceptable and that there will be no adverse long-term effects on the surrounding environment especially the water resources post mining activities.</p> <p>All requirements in the Regulations on use of water for mining and related activities aimed at the protection of water resources as contained in Government Notice No 704 dated 4 June 2004 must be adhered to.</p> <p>11. Please note that all requirements as stipulated in the National Water Act (NWA) 1998(Act No. 36 of 1998) must be adhered to.</p> <p>12.This Department reserves the right to amend and / or add to the comments made above in the light of subsequent information received.</p>
			<p>Response from Greenmined Environmental:</p> <p>The above matter as well as comments received from you dated 18 October 2021 refers.</p> <p>These comments are noted and will be implemented and adhered to,</p> <p>All comments received for you as well as our response will be incorporated in the Final Basic Assessment Report to be submitted to DMRE for their consideration.</p> <p>We trust you will find this in order. Please do not hesitate to contact us in the event of any uncertainties</p>

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Toni Parkes	Eskom	14 September 2021	No Comments Received
Me Waseefa Dhansay	Heritage Western Cape	14 September 2021	No Comments Received
Comment was requested form HWC but not yet received by the printing of this document, as soon as comments are received it will be forwarded to DMRE			
<p>Hi Stephanie</p> <p>Please follow up regarding the below submission if a NID is required – the applicant has indicated HWC’s comment is outstanding</p> <p><a href="https://www.greenmined.com/prospecting-rights/">https://www.greenmined.com/prospecting-rights/</a></p> <p>Kind regards</p> <p>Waseefa</p>			
<p>Dear Stephanie</p> <p>Marlene has followed up on the below – please confirm if the mining rights response for the NID would be acceptable to proceed with the prospecting rights from an archaeological perspective</p> <p>Please note the following link regarding HWC 2021 December Operations</p> <p>Waseefa Dhansay</p>			

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Mark Owies	Matzikama Local Municipality	14 September 2021	21 October 2021
<p>Beste Marlene</p> <p>My vergadering vanoggend met ons Stadsbeplanning afdeling verwys:</p> <p>Na ontvangs van die volgende dokumente sal getailleerde kommentaar gelewer kan word.</p> <ol style="list-style-type: none"> <li>1. Sluitingsertifikaat van vorige mynaktiwiteite op die grond waarvoor aansoek gedoen word vir prospektering.</li> <li>2. Volmag van Paramon PTY limited aan Mnr van der Westhuizen om namens Paramon op te tree / dit sluit in die Direkteur Sertifikaat van Paramoon PTY ltd.</li> </ol> <p>Geliewe kennis te neem dat hierdie kantoor die reg voorbehou om teenstellende en/of gewysigde kommentaar te lewer asook bykomende inligting en dokumentasie aan te vra, gebaseer op enige addisionele of nuwe inligting wat ontvang word.</p> <p><b>Translation:</b> Dear Marlene My meeting this morning with our Town Planning section refers to: After receiving the following documents, detailed comments will be available.</p> <ol style="list-style-type: none"> <li>1. Certificate of closure of previous mining activities on the land applied for for prospecting.</li> <li>2. Power of attorney from Paramon PTY limited to Mr van der Westhuizen to act on behalf of Paramon / this includes the Director Certificate of Paramoon PTY ltd.</li> </ol> <p>Please note that this office reserves the right to make dissenting and / or amended comments as well as request additional information and documentation, based on any additional or new information received.</p>			



STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p>Response from Greenmined Environmental:            Good day Thea,</p> <p>Please see attached response to your comments as received.            All comments received for you as well as our response will be incorporated in the Final Basic Assessment Report to be submitted to DMRE for their consideration.            We trust you will find this in order. Please do not hesitate to contact us in the event of any uncertainties.</p>			
Me Jacqui Gooch	Department of Roads and Public Works	14 September 2021	No Comments Received
Ms Nicole Abrahams	Sanral	14 September 2021	No Comments Received
Cllr Andreas Sindyamba	Matzikama Local Municipality Ward 7	14 September 2021	No Comments Received
Me Doretha Kotze	West Coast District Municipality	14 September 2021	No Comments Received
SAHRIS on-line system	SAHRA	14 September 2021	No Comments Received

**LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES**

<b>TITLE, NAME AND SURNAME</b>	<b>AFFILIATION/KEY STAKEHOLDER STATUS</b>	<b>CONTACTED DATE</b>	<b>RESPONSE RECEIVED</b>
Mr Van der Westhuizen	WELVERDIEND - Land Owner	14 September 2021	No Comments Received

**SUMMARY OF INITIAL PUBLIC PARTICIPATION PROCESS**

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

- telephonic discussions;
- direct communication with notification letters inviting comments on the DBAR Document (email);

Comments received were incorporated into the FBAR to be submitted to the DMRE for decision making.

**-END OF COMMENTS AND RESPONSE REPORT-**