

Ref No: NC 30/5/1/1/2/12321 PR

Van Zyl Mining (Pty) Ltd P.O. Box 688 Keimoes 8860

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BACKGROUND INFORMATION DOCUMENT

To whom it may concern \tag{17 April 2019}

RE: NOTICE OF AN APPLICATION IN TERMS OF SECTION 16 OF THE MINERALS AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (ACT NO 28 OF 2002) AND THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO 107 OF 1998 NEMA) AS WELL AS THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS OF 2014 (AS AMENDED BY GNR 326 EFFECTIVE 7 APRIL 2017).

Van Zyl Mining (Pty) Ltd intends to apply for a prospecting right and related infrastructural activities on the farm Wortel 42, Portion 1 and the Remainder Extent, Khai Ma Local Municipality, Namakwa District Municipality, Namaqualand Magisterial District, Northern Cape Province

SITE DESCRIPTION

The farm Wortel 42 is situated approximately 74,7km west of Pofadder and 148km east of Springbok, Northern Cape Province. The commodity of interest is Sillimanite (SI).

The GPS coordinates of the proposed prospecting areas are as follow:

Table 1: Proposed location of the prospecting right area.

the goal isn't to live forever, it is to protect a planet that will



		/	
AREA UNDER APPLICATION			
AREA: 11 383.8206 Ha			
Projection: WGS 84			
CONSTANT	East	South	
1	18.77720	28.99354	
2	18.80994	28.99157	
3	18.87876	28.98742	
4	18.87099	29.03699	
5	18.86122	29.05473	
6	18.84241	29.08883	
7	18.82321	29.12360	
8	18.81909	29.13107	
9	18.76680	29.07918	
10	18.77189	29.03733	

The GPS coordinates of the proposed prospecting boreholes are indicated on the map below, and Table below.

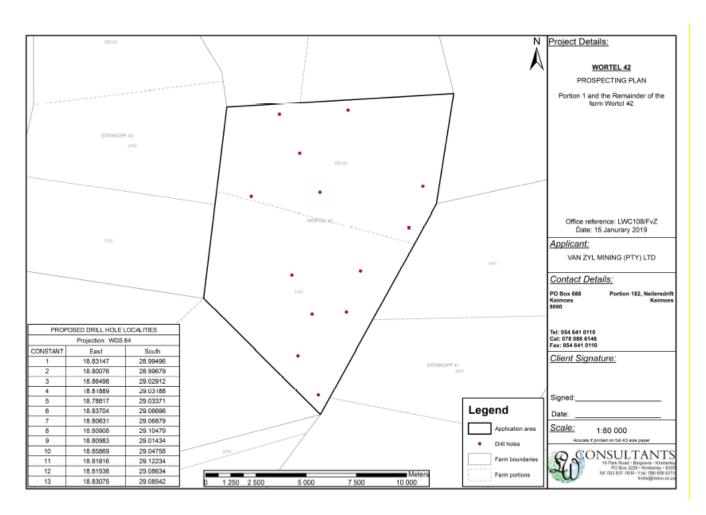


Figure 1: Locality map of the proposed prospecting borehole locations.



Table 2: Proposed prospecting borehole locations.

PROPOSED DRILL HOLE LOCALITIES		
Projection: WGS 84		
CONSTANT	East	South
1	18.83147	28.99496
2	18.80076	28.99679
3	18.86498	29.02912
4	18.81889	29.03188
5	18.78817	29.03371
6	18.83704	29.06696
7	18.80631	29.06879
8	18.80908	29.10479
9	18.80983	29.01434
10	18.85869	29.04758
11	18.81816	29.12234
12	18.81538	29.08634
13	18.83075	29.08542

LEGAL COMPLAINCE

An application for a prospecting right in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) [MPRDA] will be submitted to the Department of Mineral Resources (DMR).

The proposed project triggers the following listed activities in terms of the National Environmental Management Act,1998 (Act No.107 of 1998) [NEMA] and the Environmental Impact Assessment (EIA) Regulations (as amended by GNR 326 effective 7 April 2017), and therefore requires a basic assessment process to obtain environmental authorisation:

■ GNR 327 Environmental Impact Assessment Regulations Listing Notice 1 of 2017 Activity 20:

Any activity including the operation of that activity which requires a prospecting right in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including —

- (a) associated infrastructure, structures and earthworks, directly related to the prospecting of a mineral resource [,]; or [including activities for which an exemption has been issued in terms of section 106 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)]
- (b) the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing;

but excluding the secondary processing of a mineral resource, including the smelting, beneficiation, reduction, refining, calcining or gasification of the mineral resource in which case activity 6 in Listing Notice 2 applies.



Other legislation triggered by the proposed project includes:

An application for a Prospecting Right in terms of Section 16 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) has been submitted to the Department of Mineral Resource.

PROJECT DESCRIPTION

The proposed prospecting area is a natural area. The planned activities for the proposed site's is detailed below. All activities will be contained within the boundaries of the site.

DESCRIPTION OF PLANNED NON-INVASIVE ACTIVITIES:

(These activities do not disturb the land where prospecting will take place, e.g. aerial photography, desktop studies, aeromagnetic surveys, etc)

Phase 1 (month 0 to 4)

Desktop Studies

Desktop studies form a very important preparatory step in a new coal exploration project, and as the name suggests, this task is executed mainly from an office environment. Desktop studies will be conducted by the project geologist as part of preliminary investigations into the prospecting area by looking at all relevant published literature, geological maps, mining maps and any available evidence or records of coal findings. The outcome of the desktop studies will be a geological report of the prospecting area with a particular emphasis on the prospectively of the area. This report will also inform other subsequent prospecting steps.

Spatial Database Compilation

Spatial information will be compiled into a GIS database for access, correlation and evaluation. The GIS system will be used and maintained for the period of the prospecting right exploration program and regularly updated as new information is generated by the exploration program.

Land Survey

All spatial information accessed and collected in the field will be standardized using the WGS84 datum.

Remote Sensing

As part of the initial review, public domain aerial photos will be acquired and a detailed geological and structural interpretation will be done on these to aid in identifying target areas that are not readily evident on the ground and to provide an independent interpretation of the geology of the area. Satellite imagery will also be acquired to provide a more regional viewpoint of the area of interest. As before a detailed



geological and structural interpretation will be done on these images to provide a more regional viewpoint on the target areas. Satellite imagery is used to complement the aerial photos interpretations as the combination of multi-spectral bands can be used to highlight certain lithology's, vegetation types, soil types, alteration minerals, etc.

Geophysical survey to be undertaken

Both airborne and ground geophysical surveys may be undertaken for the prospecting right area, depending on the results of the desktop study. A small airborne magnetic/radiometric survey may be carried out over the prospect and surrounding areas to map the structural geology of the area. Follow up ground geophysical surveys will be carried out on coincident targets from the compilation of geological and geophysical data. These surveys may include ground gravity, ground electromagnetics, IP and controlled source audio magnetotellurics (CSAMT).

Field geological studies will follow after the desktop studies, and they typically include walking over the prospecting area making general observations of the geology and topography. Geological mapping activities, if terrain is suitable, may include detailed outcrop mapping, identification of iron ore hosting strata, iron ore seam outcrop mapping and sampling of exposed iron ore seams where available.

The 3D geological modelling and resource estimation step will follow after favourable exploration drilling results. This geological modelling step mainly entails geological interpretation of collected log sheet data and the subsequent geological domain. The geological model, which shows the physical continuity of the iron ore seams and the distribution of the iron ore qualities, is a critical input in iron ore resource estimation. The iron ore resource statement, which is an outcome of the resource estimation process, gives an indication of the amount of available iron ore resources in tonnage and associated qualities.

DESCRIPTION OF PLANNED INVASIVE ACTIVITIES:

(These activities result in land disturbances e.g. sampling, drilling, bulk sampling, etc.)

Phase 2 (month 5 to 16) and Phase 3 (month 17 to 24).

Drilling:

The exact location where drilling will be carried out will be determined by the results of geophysical and geological work carried out in Phase 1 of the prospecting programme. It will be assumed that a drill hole will be located in intervals of 350 meters (measured resource as per SAMREC code) with no more than 2 holes being actively drilled at any given time. The initial holes will be drilled on the Prospecting area that forms part of this application. All drill holes will be approved by the team's environmental manager prior to approval thereof. The environmental management plan related to this project will consider environmental sensitivities and advise on the location of drilling holes. By the quarter of exploration, there will be clearly defined targets that will warrant



testing by diamond, reverse circulation or percussions drilling. It is envisaged that a combination of HQ (63.5 mm) and NQ (47.63 mm) drilling will be used to drill targets. The core will be logged, cut and sampled at a core yard to be located near the prospecting site. The samples will be crushed and milled and then analysed at an accredited laboratory in for iron ore quality. The resultant drill holes will be cased and capped to make it safe for people and animals, and also allow for future access by the exploration team.

Phase 3 – Infill drilling

All drill holes will be logged every meter containing information such as hole location, hole depth, commodity depth and other geological structure encountered within the hole. The drill samples obtained from the drilling programme will be kept within suitable trays for future referencing.

Portions of the sample material representing the commodity body will be taken and placed in bags for sample analysis. Each sample will be marked with the whole number and the sample number. The sample number will also appear on the holes 'log sheet for accuracy purposes of the programme and results to be obtained.

All samples obtained from the drilling programme will be sent to an independent accredited laboratory for analysis and commodity grade. The certificated obtained will be safe kept together with the log sheets for future referencing.

All data obtained during the proposes activities will be digitally captures and already existing maps updated to form more detailed and accurate models of the study area.

All findings and results of all prospecting activities will be drafted and explained within a geological report. The geological models created will be used for the purposes and also be included within the report. The report will be further included proven resources, reserve estimation, mineral economy as well as recommendations for future work to be done.

MAIN PROSPECTING ACTIVITIES:

Drill site establishment:

A drill site of approximately 400 m² will be established that will require:

- Clearing of vegetation for sumps and the drill entrance point;
- Earth sumps for water recycling;
- Laydown area for drill rods, fuel and chemical storage;
- Chemical toilets.
- Drilling and removal of geological cores:



Drilling a hole of approximately 110 mm in diameter and removing of rock core. Number of boreholes will be finalised once non-invasive prospecting is completed.

- Casing of boreholes:
 1m² per borehole.
- Rehabilitation of drill sites.

DESCRIPTION OF PRE-/FEASIBILITY STUDIES:

(Activities in this section include but are not limited to: initial geological modelling, resource determination, possible future funding models, etc.)

The pre-/feasibility studies team will comprise of a diverse team of technical expertise in the field of mineral projects, including, geologists, mining engineers, metallurgical engineers, civil engineers, mechanical engineers, environmental scientists, marketing professionals and mineral project finance professionals. The list of activities under pre-/feasibility studies includes the following:

- Geological modelling and coal resource estimation;
- Iron Ore reserve estimation;
- Mine design and scheduling;
- Metallurgical processing;
- Market development;
- Infrastructure design;
- Engineering development;
- Human resourcing; and
- Project development and operational costing.

The mining site will contain the following:

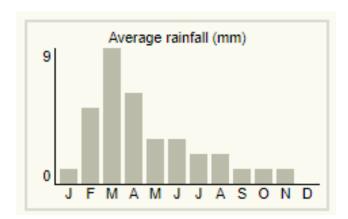
- Surveying Equipment;
- Drilling equipment;
- Geophysical logging equipment;
- Field Vehicles;
- Sample Analysis equipment; and
- Other relevant field equipment.



BIOPHYSICAL DESCRIPTION

CLIMATE:

Aggeneys normally receives about 34 mm of rain per year, with most of the rainfall occurring mainly during autumn. Figure 1 shows the average rainfall values for Aggeneys per month. It receives the lowest rainfall (0 mm) in December and the highest (9 mm) in March. The monthly distribution of average daily maximum temperatures in Figure 2 shows the average midday temperatures for Aggeneys range from 17.7 °C in July to 31.6 °C in January. The region is coldest during July when temperatures drops to 3 °C on an average during the night. Refer to Figure 3 below for an indication of the monthly variation of average minimum daily temperatures.



Average midday temperature (°C)

32

J F M A M J J A S O N D

Figure 2: Average rainfall for Aggeneys

Figure 3:Average midday temperature

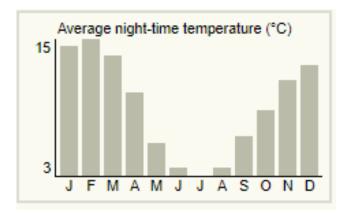


Figure 4: Average night-time temperature

GEOLOGY & SOILS:



Supracrustal rocks occur in several discontinuous east-west-trending belts within the Bushmanland Terrane, increasing in abundance toward the south in the vicinity of Garies. The heterogeneity of rocks types and the disruption cause by thrust-related deformation and the voluminous sheet-like intrusions make correlation difficult. Moore (1989) suggested a broad two-fold subdivision into a southern succession (Bitterfontein-Kammieskroon area), compromising basal quartzofeldspathic gneisses, and overlying feldspathic quartzites and garnet-cordierite gneisses, and a northern succession (Springbok-Steinkopf-Pofadder area) known as the Bushmanland Group, which comprises basal leucocratic gneisses and overlying quartzites and mica-sillimanite schists.

In the region west of Pofadder, Colliston *et al.* (1989) subdivided the supracrustal rocks of their Aggeneys Terrane into six formations (Wortel, Witputs, Skelmpoort, T'hammaberg, Hotson and Koeris. These were later grouped together as the Aggeneys Subgroup of the Bushmanland Group by Praekelt and Schoch (1997), who provided detailed descriptions of all the formations.

The basal Wortel Formations (650 to 920 m thick) consists of interlayers of biotite-sillimanite schist and subordinate quartzite, which is magnetite-bearing in places. Lenses of amphibolite occur sporadically, while sillimanite was mined for many years from sillimanite lenses in this formation.1

There is limited soils in the area with mostly rock outcrops or mountains. On the lower laying areas, soils have minimal development and are usually shallow on hard or weathered rock, with or without intermitted diverse soils. Lime is generally present in part or most of the landscape.

Management:

- Activity should be limited to area of disturbance. Where required the compacted soils should be disked to an adequate depth and re-vegetated with indigenous plants.
- All vehicles will be regularly serviced to ensure they are in proper working condition and to reduce risk of leaks. All leaks will be cleaned up immediately using an absorbent material.
- Ensure activities occur only within the designated areas and stockpile and revegetated soil as soon as possible.

SURFACE AND GROUND WATER:



The environmental impact assessment will identify water resources within the proposed footprint area, and prescribe no-go buffer areas to be managed throughout the invasive phase of the proposed prospecting activity. Moshaweng River runs north of the proposed prospecting area boundaries. Moshaweng Catchment Management Agency, within the Lower Orange Water Management Area (WMA), specifically in the Orange Sub Water Management Area.

Management:

- Truck, machinery and equipment will be regularly serviced to reduce risk of leaks. Any leakages should be reported and treated immediately in a reputable manner. For large spills Hazmat will called in.
- All vehicles will be regularly serviced to ensure they are in proper working condition and to reduce risk of leaks. All leaks will be cleaned up immediately using an absorbent material.
- Ensure water management facilities are operating adequately. Clean out silt build up over dry season.
- Monitor area for erosion and pooling and rehabilitate if necessary. Continue with Surface water monitoring.
- Portable toilets will be managed by reputable contractors and inspected daily for potential leaks
- Waste generated on site should be recycled as far as possible and sold/ given to interested contractors. Recycled waste should not be stored on site for excessive periods to reduced risk of environmental contamination. Refuse bins will be placed around site to collect all non-recycle waste for disposal at the municipality.
- Rigs will be regularly serviced to reduce risk of leaks. Pans will be placed under potential leak sites. Any leakages should be reported and treated as per the emergency response plan. For large spills a hazardous materials company will called in.

SENSITIVE LANDSCAPES:

There are no protected areas (game parks/ nature reserves or monument) in close proximity to the proposed site. There are various dry stream beds leading from the Orange river in the north. This area will be classified as a sensitive area.

Management:

Pans and artificial watering points must be cordoned off with at least 100m horizontal distance buffer zones and no activity is too take place within these areas. Consideration should be given to create alternative watering point if existing artificial water point will be disturbed.

AIR QUALITY:

Management:

- Speed on the access road will be limited to 30 km/h to prevent the generation of excess dust.
- Roads will be sprayed with water or an environmentally friendly dust-allaying agent that contains no PCB's (e.g. DAS products) if dust is generated above acceptable limits.



All vehicles will be regularly serviced to ensure they are in proper working condition and to reduce the risk of excessive emissions.

NOISE:

Management:

- Vehicles will be regularly serviced to ensure acceptable noise levels are not exceeded.
- All mining vehicles will be equipped with silencers and maintained in a road worthy condition in terms of the Road Transport Act.
- It will be ensured that employees and staff conduct themselves in an acceptable manner while on site.
- Screens will be considered if I&AP complaints are received.

FLORA:

The mining area is situated within the Desert Biome. The vegetation consists of Eastern Gariep Plains and Eastern Gariep Rocky vegetation types (Dg 9 and Dg10 according to Mucina and Rutherford, 2006). The area is not conserved in statutory conservation areas. Few intact examples of this vegetation still exist. The target conservation of this area is at 34%.

The dominant species outside the disturbed area is covered by sparse open grassland, with prominent *Stipagrostis* grass species, along with scattered drought resistant dwarf shrubs. No protected plant species could be identified at the time of the site inspection.

Management:

- ▶ Ensure permits are obtained to remove protected species. Relocate all protected species with aid of specialists. Only remove species in areas designated for activity and do not disturb surrounding areas.
- Rehabilitate disturbed areas with natural indigenous flora. Monitor for cover abundance.
- Eradicate and control all alien invasive species on site. Rehabilitate and revegetated all areas where alien invasive species were removed.

FAUNA:

Various small mammals and reptiles occur on the property. Larger herbivore species are very scares or absent due to the conflicting land use. Animals that may occur in the area will be very similar to those found around Phela / Aggeneys and surrounding towns. Small mammals, reptiles and insects will occur in the area. The fauna at the site will not be impacted by the proposed mining activity as they will be able to move away or through the site, without being harmed. Workers should be educated and managed to ensure that no fauna at the site is harmed. Upon commencement of the proposed mining activities, a fence surrounding the mining area should be erected to prevent sheep entering the site.



Management:

Relocate larger animals with the aid of specialists. Ensure relevant permits are in place.

SITES OF ARCHAEOLOGICAL AND CULTURAL INTEREST:

No graves or site of cultural interest where observed during the site investigation. A heritage specialist will conduct a Heritage Impact Assessment of the proposed footprint area to determine the presence of site of archaeological or cultural importance to be conserved throughout the operational phase of the activity.

Management:

- Should artefacts archaeological items be observed, then all activity should cease immediately, the area marked off and a specialists consulted prior to any further activity.
- Should graves be observed on site during activity progress then all activity should have ceased and the area demarcated as a no-go zone. A specialist will need to be consulted and responsible action considered, whether grave relocation or ceasing activity completely within the area and 50m buffer zone

ACCESS ROUTE:

The site can be accessed via the unnamed road from Klein Pella (Goodhouse) to Poffadder. These roads are gravel roads accessing the farms in the area. The existing farm roads/tracks will be used as far as practically possibly. The farms roads needs to be upgraded and constructed where needed, with landowner consent.

Management:

- Informal roads already exist on site and no new roads will be constructed. Vehicular movement will be restricted to existing access routes to prevent crisscrossing of tracks through undisturbed areas.
- Should any other access roads to the mining area be required it will be established in consultation with the landowner however existing roads will be used as far as practicable.
- All intersections with main tarred roads will be clearly signposted. drivers will be enforced to keep to set speed limits. Trucks will be road-worthy condition with reflective strips.
- A fund will be set aside to maintain the serviceability of the road verge where the trucks approach or depart from the main road.

EXISTING INFRASTRUCTURE:

- The existing infrastructure, such as housing, power lines, roads etc. within the footprint of the proposed prospecting area will be accommodated and no drill sites will require the demolition/removal of existing infrastructure.
- Further to the above, the applicant will contain all activities to the 400 m² boundaries of each drill site.

VISUAL EXPOSURE:



The mining area was identified to constitute the lowest possible visual impact on the surrounding environment. Please note that prospecting will be done, so the sites of interest will be small and will be viewable from different areas.

The proposed prospecting footprint falls within a rural area partially altered through subsistence farming and the presence of community areas. As mentioned earlier, a maximum of 2 holes (400 m²/holes) will be actively drilled at any given time, with drill sites reinstated as the activity progress. In light of this the invasive activities associated with the proposed prospecting project will impact the aesthetics of the study area at the location of each drill site.

Management:

- The applicant should however ensure that housekeeping is managed to standard, as this will mitigate the visual impacts during the operational phase of the mine.
- Upon closure the site will be rehabilitated and sloped to insure that the visual impact on the aesthetic value of the area is kept to a minimum.
- The site will have a neat appearance and be kept in good condition at all times.

ABLUTION, WASTE WATER & WASTE DISPOSAL:

- Ablution facilities will consist of chemical toilets hired from a contractor and serviced regularly.
- Any effluents containing oil, grease or other industrial substances will be collected in a suitable receptacle and removed from the site, either for resale or for appropriate disposal at a recognised facility.
- Spills would be cleaned up immediately to the satisfaction of the Regional Manager by removing the spillage together with the polluted soil and by disposing of them at a recognised facility.
- No mining waste will be generated. General waste will be disposed at the authorised Aggeneys Disposal facility.
- Non-biodegradable refuse such as glass bottles, plastic bags, metal scrap, etc., will be stored in a container at a collecting point and collected on a regular basis and disposed of at a recognised landfill site.
- Biodegradable refuse generated will be handled as indicated above.
- No waste will be burned or buried on site.

FINAL REHABILITATION:

- Progressive rehabilitation will entail the ongoing reinstatement of drilled sites during the invasive phase of the project.
- Upon final rehabilitation, all infrastructures, equipment, and other items used during the prospecting period will be removed from the prospecting footprint (Section 44 of the MPRDA).
- Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the prospecting area and disposed of at a recognized landfill facility. It will not be permitted to be buried or burned on the site.



- The environmental management programme to be approved for the project will prescribe the rehabilitation objectives to be implemented both during progressive rehabilitation as well as the final closure of the prospecting area. Final rehabilitation shall be completed within a period specified by the Regional Manager.
- Rehabilitation of the surface area shall entail landscaping, levelling, top dressing, land preparation, seeding (if required), and weed / alien clearing.
- Weed / Alien clearing will be done in a sporadic manner during the life of the mining activities. Species categorised as weeds according to the National Environmental Management: Biodiversity Act (Act No. 10 of 2004) [NEMBA] Alien and Invasive Species Regulation GNR 598 and 599 of 2014 Species regarded as need to be eradicated from the site on final closure.
- Final rehabilitation shall be completed within a period specified by the Regional Manager.

Van Zyl Mining (Pty) Ltd will make use of temporary infrastructure during the mining operations. Workers will be transported to and from the site daily.

PUBLIC INVOLVEMENT

This document is to inform you about the proposed activity and to determine whether there are any concerns or objections from Interested and Affected Parties (I&AP's) that need to be considered.

As an Interested and Affected Party you are kindly requested to complete the comments form and give any comment, concern or input with regard to the current land use of the area, the environment as well as socio-economic conditions that you feel might be affected by the proposed activity. When submitting response please provide suggestions to mitigate the anticipated impact of each identified activity.

Please contact Yolandie Coetzee at the contact details as presented in the letterhead or at yolandie.c@greenmined.co.za 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) on or before **24 May 2019.** If we do not receive any comments from you within 30 days of receipt of this notice, it will be accepted that you do not have any objections / comments with regard to the project.

A register of interested and affected parties (I&AP's) will be opened and maintained containing the names, contact details and address of all persons who have submitted written comments, attended meetings or have in writing requested to be registered and all organs of state which have jurisdiction in respect of the activity.

Please note that only registered I&AP's and stakeholders will be entitled to comment on reports and plans to be submitted to the Department provided that the party provide its name, contact details and address and discloses



any direct business, financial, personal or other interest which he / she may have in the approval or refusal of the applications.

The DBAR will be submitted to the Department of Mineral Resources (DMR), Northern Cape, for review purposes. This report will also be made available to the public for a 30 days' review period. An electronic copy of the report will be published on the Greenmined Environmental website (www.greenmined.com)

The DBAR will then be updated to reflect the comments received during the public commenting period. Upon which, the Final Basic Assessment Report (FBAR) will be submitted to the DMR for its consideration as part of the authorization process in terms of the NEMA regulation. A copy of the final report will be made available on the Greenmined Environmental website (www.greenmined.com). All registered I&AP's and stakeholders will be notified in writing within 14 days of the date of the decision of the outcome of the application, including the reasons for the decision and the right of appeal.



CONTACT DETAILS:

Signature:

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<u>C(</u>	OMMENTS/ OPMERKINGS	<u>:</u>
	No Objection:	
F	Request additional	
	•	
	information:	
	Concerns:	
L		



Are there any other organisations or individuals that you feel should be invited to comment? If so, please provide their contact details:

Contact name:
Organisation (if applicable):
Address:
Tel:
Fax
E-mail
Contact name:
Organisation (if applicable):
Address:
Tel:
Fax
E-mail

Your feedback is valued and will be addressed appropriately.

Kind Regards

Yolandie Coetzee

Greenmined Environmental