

CZ SAND MINE (PTY) LTD

**PROPOSED SAND MINE ON A PORTION OF THE
REMAINING PORTION OF THE FARM
RHENOSTERKOP NO 155, REGISTRATION
DIVISION OF BEAUFORT WEST, WESTERN CAPE
PROVINCE**

COMMMENTS AND RESPONSE REPORT

DEPARTMENT REFERENCE NUMBER:

WC30/5/1/3/2/10361MP

JUNE 2025



NOTIFICATION OF STAKEHOLDERS AND I&AP'S OF THE ENVIRONMENTAL AUTHORISATION/MINING PERMIT APPLICATION

COMMENTING PERIOD: 16 MAY 2025 – 17 JUNE 2025

During the public participation process the stakeholders and I&AP's were informed of the availability of the Draft Basic Assessment Report by means of notification letters send via email. A 30-days commenting period was allowed up and until 17 June 2025. The project was advertised in the Oudtshoorn Courant Newspaper on 15 May 2025, and site notices were placed at the entrance to the site as well as the Beaufort West Library. 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
Mr J Penxa	Central Karoo District Municipality	16 May 2025	No Comments Received
Mr D Welgemoed	Beaufort West Local Municipality	16 May 2025	No Comments Received
Cllr Josias De Kock Reynolds	Beaufort West Local Municipality Ward 2	16 May 2025	No Comments Received
Me Waseefa Dhansay	Heritage Western Cape	25 April 2025	07 May 2025

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
<p><u>Comments received on 07 May 2025:</u></p> <p>The matter above has reference.</p> <p>Heritage Western Cape is in receipt of your application for the above matter received. This matter was discussed at the Heritage Officers Meeting (HOMS) held on 06 May 2025.</p> <p>You are hereby notified that, since there is no reason to believe that the proposed mining permit for a sand mine on Farm Rhenosterkop No 155-RE, Beaufort West will have an impact on heritage resources, no further action under Section 38 of the National Heritage Resources Act (Act 25 of 1999) is required.</p> <p>However, should any heritage resources, including evidence of graves and human burials, archaeological material and paleontological material be discovered during the execution of the activities above, all works must be stopped immediately, and Heritage Western Cape must be notified without delay.</p> <p>This letter does not exonerate the applicant from obtaining any necessary approval from any other applicable statutory authority.</p> <p>HWC reserves the right to request additional information as required.</p> <p>Should you have any further queries, please contact the official above and quote the case number.</p>			
Me Alana Duffell-Canham	Cape Nature	16 May 2025	No Comments received
Ms M Simons	Cape Nature - George	16 May 2025	No Comments received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mr Cor van der Walt Me Mashudu Marubini Me Phyllis Pienaar	Department of Agriculture, Land Reform & Rural Development <ul style="list-style-type: none"> █ Cape Town █ Pretoria █ Beaufort Wes 	16 May 2025	No Comments received
Mr Seoka Lekota Me Lutendo Netshilema	Department of Agriculture Forestry and Fisheries Biodiversity and Conservation Department	16 May 2025	10 June 2025
Mr S Ross	Department of Human Settlements Water and Sanitation - Gqeberha	16 May 2025	No Comments Received
Mr Solly Fourie	Department of Economic Development and Tourism	16 May 2025	No Comments Received
Me Adri LaMeyer	Department of Environmental Affairs and Development Planning - Western Cape	16 May 2025	20 June 2025
<p>COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED MINING RIGHT BY CZ SAND MINE (PTY) LTD ON A PORTION OF THE REMAINING PORTION OF THE FARM RHENOSTERKOP NO. 155, BEAUFORT WEST (DMPR REF: WC 30/5/1/3/2/10361MP)</p> <p>1. The email correspondence of 16 May 2025 regarding the availability of the Draft Basic Assessment Report ("BAR") refers.</p>			

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<p>2. The Department apologises for the delay in submitting its comments on the Draft BAR. The Department has reviewed the Draft BAR with associated Environmental Management Programme ("EMPr") dated May 2025 and other documents that were available for download from the website of the environmental assessment practitioner and offers the following comments below.</p> <p>3. According to the Draft BAR, the proposed mining area will be accessed via an existing farm road that will be upgraded and maintained for the duration of mining activities. It is understood that the same access road will also be used for the adjacent dolerite mine located on a portion of the Remaining Portion of the Farm Rhenosterkop No.115. A general authorisation for section 21(c) and (i) water uses in terms of the National Water Act, 1998 (Act No. 36 of 1998) was issued to Otter Mist Trading 1057 (Pty) Ltd. to, inter alia, upgrade the existing access road for the Rhenosterkop dolerite quarry river crossings.</p> <p>3.1. Has an agreement has been reached between the applicant and Otter Mist Trading 1057 (Pty) Ltd to use the upgraded access road?</p> <p>3.2. Will the access road be rehabilitated and if yes, by whom? The Draft BAR states that "the access road will be upgraded and extended and will be rehabilitated as part of the final reinstatement", but then also that "the access road will remain intact to be used by the landowner." The Rehabilitation and Closure Plan dated May 2025 (Appendix L) states that "the road will be upgraded and extended as the open cast mining progress and will be rehabilitated as part of the final reinstatement of the area". Clarification is required on the future of the upgraded access road.</p> <p>4. The Site Sensitivity Verification and Agricultural Compliance Statement compiled by SoilZA dated 29 April 2025 recommended that mining should be undertaken to a maximum depth of 3m. Whilst this recommendation was included in the Draft BAR, it does not appear to be included in the EMPr. Please ensure that this recommendation is included in the EMPr.</p> <p>5. The Freshwater Ecological Impact Assessment prepared by The Biodiversity Company dated 6 May 2025 refers.</p> <p>5.1. Section 3.2.1 of the Assessment refers to the Western Cape Biodiversity Spatial Plan ("WCBSP") that was updated in 2017. Please be advised that the most recent WCBSP is the 2023 WCBSP that was adopted on 13 December 2024.</p> <p>5.2. Figure 11 of the Draft BAR, Appendix D, and various figures in the Freshwater Ecological Impact Assessment (e.g. Figure 3-18) show the proposed mining area in relation to a drainage line that bisects the mining area to the north-east. Potential impacts to a water resource and impacts on water quality associated with the drainage line were however not identified in the Draft BAR and EMPr. Table 3-8 of the Freshwater Ecological Impact Assessment identified a buffer of 15m for drainage lines and 30m for the Platdoring River. Although not indicated in section 5 (mitigation measures) of the specialist</p>			

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<p>assessment, should it not be included in the EMPr that a 15m buffer should be maintained between mining activities and the drainage line?</p> <p>6. In terms of terrestrial biodiversity, a letter of confirmation from EcoFloristix Specialist Botanical Surveys dated 31 March 2025 was included as Appendix M2. Said letter referred to the Terrestrial Biodiversity Impact Assessment compiled by die terrestrial biodiversity specialist dated 22 March 2023, prepared for the dolerite mining permit application on the same property. Since this is a new application undertaken by a new applicant, the 2023 Terrestrial Biodiversity Impact Assessment should have been included as an appendix as it cannot be assumed that all interested and affected parties would have a copy of the assessment.</p> <p>7. It appears that approval is also sought for the mining of gravel, as per page 27 of the Draft BAR: "Should the MP be issued, and the mining of gravel be allowed..." Should this be the case, then the description of the project proposal should be amended to also include the mining of gravel.</p> <p>8. Please note that the site activities map (Appendix C) does not appear to indicate the scrning and stockpiling area.</p> <p>9. General comments:</p> <p>9.1. Correct the reference "Error! Bookmark not defined" in the Rehabilitation and Closure Plan.</p> <p>9.2. Review inconsistencies regarding the height of soil stockpiles: reference is made to the height of stockpiles not exceeding 2m, but also that topsoil heaps may not exceed 1.5m.</p> <p>10. Please note that the comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by the Department should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of the application submitted to the competent authority.</p> <p>11. The holder of the mining permit and environmental authorisation is reminded of its "duty of care" prescribed in section 28 of the National Environmental Management Act, 1998 (Act No. 107 of 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>			

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<p>The Department reserves the right to revise initial comments and request further information based on any or new information received.</p> <p><u>Greenmined's response on 27 June 2025:</u></p> <p>1. Site Environmental Importance and Conservation Guidelines</p> <p>We take note that the proposed mining area falls within a Medium Site Environmental Importance (SEI), with potential species of conservation concern. The following guidelines as advised are incorporated into the Final Basic Assessment Report:</p> <p>Comment Noted. The relevant guidelines, including the SCC (2012), Ecosystem Guidelines (de Villiers et al., 2016), and the Mining and Biodiversity Guidelines (2013), have been fully incorporated into the final report.</p> <p>2. Screening Tool vs Specialist SEI Discrepancy</p> <p>Comment noted. The discrepancy is addressed in the attached Terrestrial Biodiversity Impact Assessment (Keet, 2023), page 8, Table 3, justifying the specialist rating.</p> <p>3.Species of Conservation Concern (SCC)</p> <p>Comment noted. The SCC list and habitat confirmation are included in Table 1 on page 6 of the Biodiversity Impact Assessment (Keet, 2023).</p> <p>High Screening Rating=1. Confirmed habitat for SCC. 2. SCC, listed on the IUCN Red List of Threatened Species or South Africa's National Red List website as Critically Endangered, Endangered or Vulnerable, according to the IUCN Red List 3.1. Categories and Criteria and under the national category of Rare.</p> <p>4. Mitigation Detail Request</p> <p>The faunal mitigation measures must include further details on relocation procedures and the monitoring of SCC during the construction phase. Expand on who will conduct relocations, how SCC will be handled, and what monitoring protocols apply.</p>			

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<p>Comment noted. The Mitigation and monitoring measures have been included: environmental officer/specialist to handle relocations, records of fauna interactions, exclusion fencing, and pre- and post-construction surveys.</p> <p>5. Riparian Habitat Integrity</p> <p>The assessment notes a moderately modified PES (Category C) for the Platdoring River. Please clarify if any long-term impacts to instream sedimentation or erosion are expected as a result of the road crossing.</p> <p>Comment noted.: Refer to Freshwater Ecological Impact Assessment, Table 4-1 and Section 5.1.4 (page 46), which address potential erosion and include mitigation strategies. An optimized layout, as obtained from the specialist report, is hereto attached and will be included in the Final Basic Assessment Report as Appendix A, serving as an addendum to the Regulation Plan.</p> <p>6. Macroinvertebrates / Wet Season Constraints</p> <p>Comment noted.: The one-season data collection is deemed sufficient. Section 6, page 48 of the Biodiversity Impact Assessment recommends monitoring.</p> <p>We thank you for taking part in the public participation process as well as your valuable contribution in providing comments. 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 Danie Swanepoel	Department of Environmental Affairs and Development Planning - George	16 May 2025	No Comments Received
Dr Robert Macdonald	Department of Social Development	16 May 2025	No Comments Received

STAKEHOLDERS			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Mrs W Adams	Department of Social Development - Beaufort West	16 May 2025	No Comments Received
Mr Xander Smuts Mrs Vanessa Stoffels	Department of Transport and Public Works	16 May 2025	26 May 2025
Me Candice van Heerden	Department of Labour	16 May 2025	No Comments Received
Mr L Mbekeni Mr R Janse van Rensburg	Department of Rural Development and Land Reform	16 May 2025	No Comments Received
Ms Nicole Abrahams	SANRAL	16 May 2025	No Comments Received
SAHRIS	South African Heritage Resource Agency	16 May 2025	Refer to Heritage Western Cape Section

LANDOWNER / SURROUNDING LANDOWNERS / INTERESTED AND AFFECTED PARTIES			
TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Adriaan Johan Nigrini – Landowner	Landowner of: Rhenosterkop 155 of the remaining extent portion 0 Rhenosterkop 155 Portion 9 Rhenosterkop 155 Portion 5 (RE) Rhenosterkop 155 Portion 6	16 May 2025	No Comments Received
Sabre Trust	Riet Fontein 122 Portion 1 Riet Fontein 122 Portion 11 Klipkopjes leegte 122 Portion 2 Elandsfontein 150 Portion 2	16 May 2025	No Comments received
Jean de Jager	Riet Fontein 122 Portion 10	16 May 2025	No Comments received
Andre Gerard Lautre Murray	Speelmans Kuil 154 Remaining Extent Portion 0	16 May 2025	No Comments received

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TITLE, NAME AND SURNAME	AFFILIATION/KEY STAKEHOLDER STATUS	CONTACTED DATE	RESPONSE RECEIVED
Gideon Vivier Boerdery	Rhenosterkop 155 Portion 4 (RE) Rhenosterkop 155 Portion 9 (RE)	16 May 2025	No Comments Received
Mr FC Knoetze	African Green Ventures Renewable Energy	16 May 2025	No Comments Received

SUMMARY OF PUBLIC PARTICIPATION PROCESS
<p>The stakeholders and I&AP's were informed of the project through:</p> <ul style="list-style-type: none"> ❖ Email notifications letters sent via email ❖ Advertisement in the Oudtshoorn Courant on 15 May 2025 ❖ On-site notices that were placed at the entrance to the site and the Beaufort West Public Library; <p>The comments received on the DBAR was incorporated into the FBAR and submitted for decision making. See attached as Appendix F.1 & F.2 proof of the correspondence with the I&AP's and stakeholders during the public participation process.</p>