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BACKGROUND INFORMATION DOCUMENT

The Proposed Expansion of Grindrod Navitrade 11.6ha Portion 95 by additional 25ha of Portion 94 ERF 5333 to Increase Coal Handling and Storage Capacity at Navitrade Facility, Richards Bay, KZN.

10 APRIL 2023

Prepared By:

**Emvelo Quality and Environmental Consultant
(PTY) Ltd**

Prepared For:

Grindrod Terminals (PTY) Ltd



INTRODUCTION/BACKGROUND

Emvelo Quality and Environmental Consultant (PTY) Ltd has been appointed by RBT Grindrod Terminals (Pty) Ltd as the independent Environmental Assessment Practitioner (EAP), to facilitate a Scoping/EIA process as required in terms of the National Environmental Management Act, 1998 (Act. No. 107 of 1998) (NEMA) for this application.

Grindrod (Pty) Ltd. intends to increase the capacity of its Navitrade terminal which links rail and road logistics to the Port of Richards Bay. As a result, a Pre-Feasibility Study (PFS) was conducted which identified an optimised and efficient solution for expanding the Navitrade terminal's capacity to 4Mtpa. Therefore, Richards Bay Grindrod Terminal intends to expand the coal stockpiling facility of its Navitrade terminal by 25ha. This stems from a Memorandum of Agreement (MOA) with Transnet Freight Rail (TFR) and Transnet Port Terminals (TPT), as well as advanced negotiations with local mine for a medium- to long-term take-off agreement.

The proposed expansion will increase the capacity of coal handling and storage and the development of this coal export facility is one of the key strategic business development projects for the Richards Bay Port in the city.

Consequently, an environmental impact assessment (EIA) has commenced, assisting RBT Grindrod Terminals (Pty) Ltd (applicant) in identifying all potential adverse environmental consequences of the project, their extent, significance and to ensure that the environmental management requirements are adequately implemented.

The purpose of this Background Information Document (BID) is to provide you, as an Interested or Affected Party (I&AP), with a brief description of the EIA process to be undertaken and to obtain comments and contributions from I&AP's with regards to the potential impacts to the environment by the proposed project.

In addition, this BID also covers other Environmental Statutory requirements as described below:

The National Water Act (NWA, 36 of 1998) as provided in Section 21 of the Act, governs the process of applying for Water Use. A provision for Water Use is made for two forms of application: General Authorisation & and Water Use License Application, depending on the scope of the activity. Therefore, this application will follow an **Amendment of existing WULA**, as *Section 21(c); and Section 21 (i)* has been triggered.

The National Environmental Management: Air Quality Act 39 of 2004 (AQA) as provided in Section 21 of the Act, governs the process of applying for Atmospheric Emissions licenses (AELs). **Section 21 Category 5.1** is applicable to this proposal. As a result, the expansion of the facility will require a Variation (Amendment) of existing AEL.

PROJECT DESCRIPTION

Existing Grindrod Navitrade site is within Portion 95 ERF 5333 and has an extent area of 11.6ha. The proposed expansion will be 25ha and will fall within portion 94 of Erf 5333.

The purpose of expansion is to increase the terminal's coal export capacity to 4Mtpa, with an option of future diversification into other products such as magnetite, manganese, chrome, or ferrochrome.

The Proposed Expansion of Grindrod Navitrade will entail the following:

- ✚ Construction of coal storage facility with a capacity design on the assumption that up to 4 grades of coal will be stored with 400,000t maximum stockholding. Coal will be dispatched on a first-in-first-out (FIFO) basis. The operational optimal of 300 000t per month has been estimated. For the Inbound (Receipts) of 10 000 Tons per day,

and Outbound (Vessel loading) of 15 000 Tons per day. For coal inbound 4 x Trains per day each 2 500 tons will be involved using existing Navitrade railway.

- ✚ Stockyard stockpiles of 30m high x 450m long with automated stacking and reclamation with front-end loaders (FELs) into hoppers and onto reclaim conveyors.
- ✚ The construction of a pollution control dam (PCD) with a 31,000m³ total storage capacity.
- ✚ Construction of a 2% crossfall (V-Drain stormwater drainage) across the stockyard to allow for settlement and stormwater runoff into the PCD. Dirty runoff from the existing stockyard is directed into an existing PCD on the southern portion of the Navitrade site, with a 1,350m³ storage capacity. This facility will contribute to the total storage requirement of the system. In order to allow this PCD to overflow into the future PCD-South, the perimeter needs to be raised and a concrete spillway constructed to route overflows into the larger downstream PCD.
- ✚ Installing fixed material handling equipment to increase efficiency and reduce yellow plant reliance, thereby

achieving both lower operating cost and safer operations;

- ✦ Installing a fixed dust suppression system which recycles contaminated PCD water. A fixed sprinkler system using a pressurised reticulation system to spray points.
- ✦ Relocation of existing access road alignment within the facility, and construct 6m width access road around stockpile footprint.
- ✦ Removing an existing asbestos pipeline owned by South32 and replacing it with a relocated HDPE pipe. Also relocating/removing a second out-of-service underground pipeline. Both pipes clash with the squared-off future stockyard.
- ✦ The facility will continue using the existing materials handling conveyors from the tippler to the ground stacks at the stockyard.
- ✦ Modification of railway within the facility to cater for handling of 4Mtpa coal throughput, which will result into 4 x 50-wagon trains to be tipped per day.

The Grindrod Navitrade site expansion will meet the following objectives:

- ✦ Modify the rail yard to handle a higher frequency of trains and decrease dependence on Transnet's train schedule.

- ✦ Squaring off' the stockyard and increasing its footprint to store up to 400,000t of coal in a single central stockpile, at the time (based on an assumption of four future grades) calculated as 10% of the intended yearly throughput.
- ✦ Providing adequate water handling and run-off drains linked to an increased PCD.
- ✦ The operation for expansion will be linked to existing terminal systems, loading area and tipper areas. Grindrod intend to modify the rail yard to handle a higher frequency of trains and decrease dependence on Transnet's train schedule.

Existing Infrastructure and Services for Navitrade Portion 95

Existing Grindrod Navitrade site of 11.6ha within Portion 95 ERF 5333 has the following supporting infrastructure and services:

- ✦ The combined total storage capacity of the stockyards ranges from 200,000t to 270,000t depending on number of product grades and customers.
- ✦ A PCD with a storage capacity of 1,350m³.
- ✦ Two tipplers; one is dedicated for coal and one for rock phosphate. However, rock phosphate is not

stored but in transit enroute to Foskor.

- ✚ Bulk loading areas.
- ✚ Shunting operations (terminal shunt locomotive).
- ✚ Water clarification plant & storage tanks (operating areas).
- ✚ The terminal is linked to TFR's railway exchange yard at Bhizolo with a ±1km private siding line.

The implementation of expanded Grindrod Navitrade Facility will also provide capacity to handle the large volume of coal. As a result, the coal from Grindrod Seamunye Facility will be moved to Navitrade Facility.

PROJECT LOCATION

The Navitrade Expansion site is located with portion 94 of Erf 5333, Alton South Richards Bay at approximately (28°46'27.47"S, 32°1'17.59"E).

The project area is within Quaternary Catchment W12F of Pongola-Mtamvuma Catchment Management Area.

The site co-ordinates are as follows:

Table 1: Site Coordinates

Expansion Perimeter Co-ordinates	
Corner 1	28°46'34.57"S, 32°1'1.33"E
Corner 2	28°46'35.57"S, 32°1'1.34"E
Corner 3	28°46'35.48"S, 32°1'18.59"E
Corner 4	28°46'25.71"S, 32°1'29.72"E
Corner 5	28°46'19.75"S, 32°1'33.86"E
Corner 6	28°46'19.85"S, 32°1'14.37" E
Corner 7	28°46'32.06"S, 32°1'4.26"E
Corner 8	28°46'34.40"S, 32°1'4.36"E

WHAT IS AN ENVIRONMENTAL IMPACT ASSESSMENT?

An Environmental Impact Assessment (EIA) is an effective planning and decision-making tool, which allows for the identification of potential adverse environmental consequences of a proposed project, and its management through the planning process.

In terms of the National Environmental Management Act, 1998 (Act No.107 of 1998), as read with the Environmental Impact Assessment (EIA) Regulations of 2014 as amended in 2017, an Environmental Authorization must be obtained from the relevant decision-making authority, the Department of Economic Development, Tourism and Environmental Affairs (EDTEA) prior to the commencement of any of the listed activities that may result in potential negative impacts on the environment. Thus, an environmental impact assessment is required. A Basic assessment that includes

the public participation process will be performed.

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

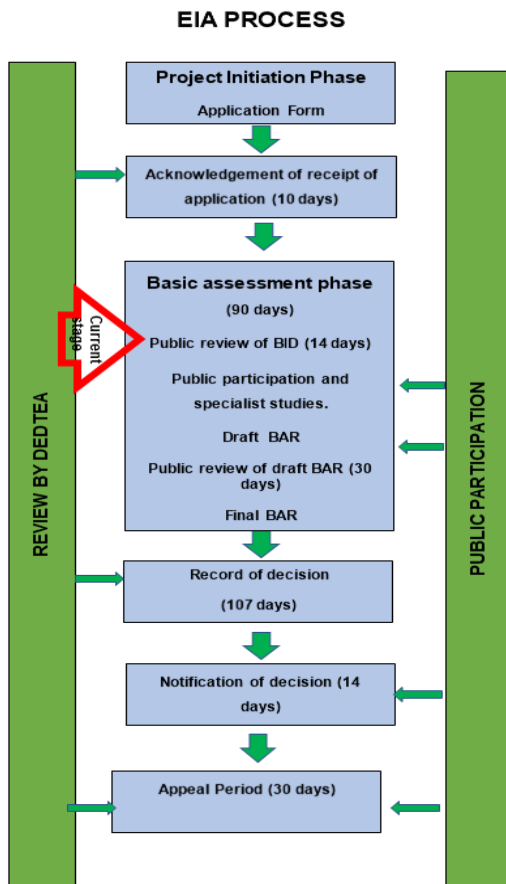


Figure 1: EIA process

In terms of the Environmental Impact Assessment (EIA) regulations, an independent Environmental Assessment Practitioner (EAP) must be appointed to conduct the EIA. Therefore, Emvelo Consultant has been appointed by Grindrod Terminals (Pty) Ltd.

Emvelo Consultant will identify and assess the potential environmental impacts associated with the proposed activity by conducting an objective and independent EIA in which all the relevant information and opinions of Interested and Affected Parties (I&APs) will be collected and passed on to the Department of Economic Development, Tourism and Environmental Affairs (EDTEA). In this way, an informed decision-making process can take place.

LISTED ACTIVITIES TRIGGERED BY THIS PROJECT

The proposed project triggers the following listed activities of the EIA Listing Notices;

Table 2: NEMA 2014 Triggers

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 1 of the EIA Regulations, 2014 as amended	Describe the portion of the proposed project to which the applicable listed activity relates. As well as applicability.
19	<p>The infilling or depositing of any material of more than <u>10 cubic metres</u> into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than <u>10 cubic metres</u> from-</p> <p>(i) A watercourse —but excluding where such infilling, depositing, dredging, excavation, removal or moving—</p> <p>(a) will occur behind a development setback;</p> <p>(b) is for maintenance purposes undertaken in accordance with a maintenance management plan; [or]</p> <p>(c) falls within the ambit of activity 21 in this Notice, in which case that activity applies;</p> <p>(d) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or</p> <p>(e) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.</p>	<p>Portion 94 of Erf 5333, Alton South, Richards Bay.</p> <p>Applicability:</p> <p><i>There is wetland depression classified as NFEPA within the proposed expansion area. Therefore, the construction will result in excavation within the wetland area. Other wetland features were identified during preliminary infield investigation. The wetland delineation will verify the existence of other wetland or geomorphological bodies within the project area. The site clearance and levelling will result in excavation and infilling of more 10m³ soil within the wetland at approximately (28°46'33.37"S, 32° 1'4.73"E);</i></p>
34	<p>The expansion or changes to existing facilities for any process or activity where such expansion or changes will result in the need for a permit or licence or an amended permit or licence in terms of national or provincial</p>	<p>Portion 94 of Erf 5333, Alton South, Richards Bay.</p>

	<p>legislation governing the release of emissions or pollution, excluding-</p> <p>(i) where the facility, infrastructure, process or activity is included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies; [or]</p> <p>(ii) the expansion of [or changes to] existing facilities or infrastructure for the treatment of effluent, wastewater, polluted water or sewage where the capacity will be increased by less than 15 000 cubic metres per day; or</p> <p>(iii) <u>the expansion is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will be increased by 50 cubic meters or less per day</u></p>	<p>Applicability:</p> <p><i>The proposed Navitrade expansion will require an AEL Variation, as per engagement with KCDM Air Quality Directorate.</i></p>
Activity No(s):	Provide the relevant Scoping and EIR Activity(ies) as set out in Listing Notice 2 of the EIA Regulations, 2014 as amended.	Describe the portion of the proposed project to which the applicable listed activity relates. As well as applicability
15	<p>The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for-</p> <p>(i) the undertaking of a linear activity; or</p> <p>(ii) maintenance purposes undertaken in accordance with a maintenance management plan'</p>	<p>Portion 94 of Erf 5333, Alton South, Richards Bay.</p> <p>Applicability:</p> <p><i>Construction will result in the clearance of approximately 25ha of indigenous vegetation for expansion of Navitrade facility.</i></p>

Activity No(s):	Provide the relevant Basic Assessment Activity(ies) as set out in Listing Notice 3 of the EIA Regulations, 2014 as amended.	<i>Describe the portion of the proposed project to which the applicable listed activity relates. As well as applicability.</i>
12	<p>The clearance of an area of 300 square metres or more of indigenous vegetation except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan.</p> <p>d. KwaZulu-Natal</p> <p>v. Critical biodiversity areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>Portion 94 of Erf 5333, Alton South, Richards Bay.</p> <p>Applicability:</p> <p><i>Construction will result in the clearance of approximately 25ha of indigenous vegetation for expansion of Navitrade facility, within a CBA1.</i></p>
14	<p>The development of—</p> <p>[(xii) infrastructure or structures with a physical footprint of 10 square metres or more]</p> <p>(ii) infrastructure or structures with a physical footprint of 10 square metres where such development occurs—</p> <p>(a) within a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.</p> <p>d. KwaZulu-Natal</p> <p>vii. Critical biodiversity areas or ecological support areas as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans;</p>	<p>Portion 94 of Erf 5333, Alton South, Richards Bay.</p> <p>Applicability:</p> <p><i>There is wetland depression classified as NFEPA within the proposed expansion area. Therefore, the proposed expansion will result in construction infrastructure, such as coal handling and storage facility of more than 10m². The wetland delineation will verify the existence of other wetland or geomorphological bodies within the project area. This will overlap the wetland at approximately (28°46'33.37"S, 32° 1'4.73"E); within CBA 1.</i></p>

The NEMA, and the Environmental Impact Assessment (EIA) Regulations (2014) as amended in 2017, govern the process of applying for environmental authorization for certain developments. A provision in the EIA Regulations is made for two forms of assessment: Basic Assessment and Scoping & EIA, depending on the scope of the activity. The EIA regulations specify that: Activities

identified in Listing Notice 1 and 3 (GNR 327 and 324 of 2017) requires a Basic Assessment while activities identified in Listing Notice 2 (GNR 325 of 2017) are subject to a Scoping and EIA. ***The listed activities associated with the proposed development are: Listing Notice 1, Listed Activity 19 & 34; Listing Notice 3, Listed Activity 12 & 14; Listing Notice 2, Listed Activity 15.*** Therefore, this application will follow a Scoping/EIA process, as a Listing Notice 2 has been triggered. Therefore, this application will follow a **Scoping/EIA process**, as a Listing Notice 2 has been triggered.

WHAT IS PUBLIC PARTICIPATION?

Public participation is the process that promotes information sharing, consultation, and active involvement amongst stakeholders, and all interested and affected parties. During the Public Participation Process, input from the proponent, technical experts, government authorities and the general public will be gathered to result in a better understanding of the project for all involved thus ensuring an informed decision-making throughout the process.

REGISTRATION OF INTERESTED AND AFFECTED PARTIES.

Any person, company, authority or other entity that might be directly or indirectly affected by the proposed activity is invited to register as an I&AP, in order to assist the EAP in identifying possible environmental, economic and social impacts of the proposed development and to make suggestions for mitigations. These comments will be included as part of the Basic assessment report which will be submitted to the Department of Economic Development, Tourism and Environmental Affairs.

Interested and affected parties (I&APs) may forward their written comments along with their contact details within 14 days from receiving the document to; **Phumzile Lembede**.

Postal address: P. O. Box 101672, Meerensee,3901;

Tel: 035 789 0632;

Fax: 086 577 5220,

Email: Info@emveloconsultants.co.za

APPENDIX A: (LOCALITY MAPS)

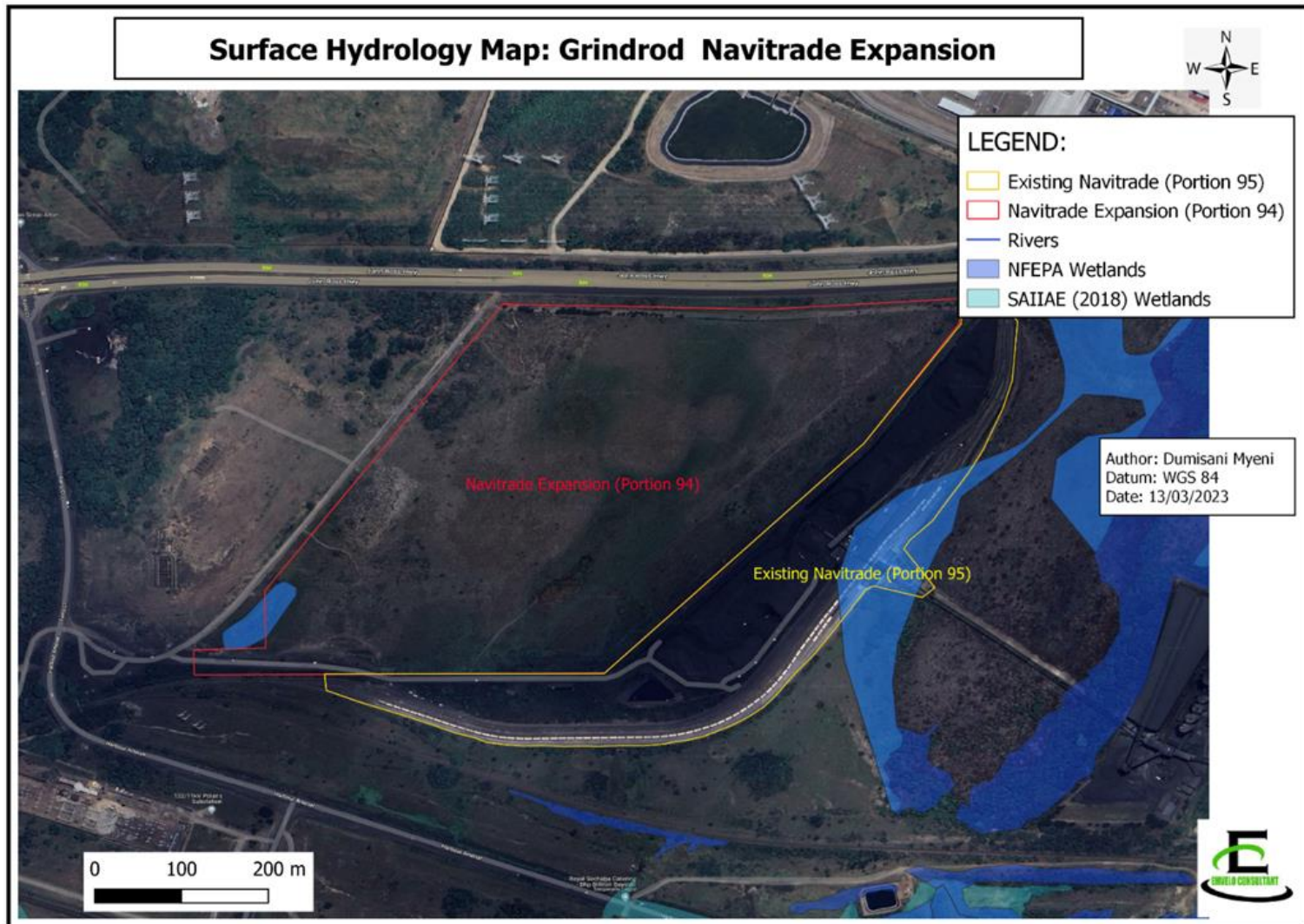


Figure 1: Sensitivity Map Showing Surface Hydrology of the Study Area

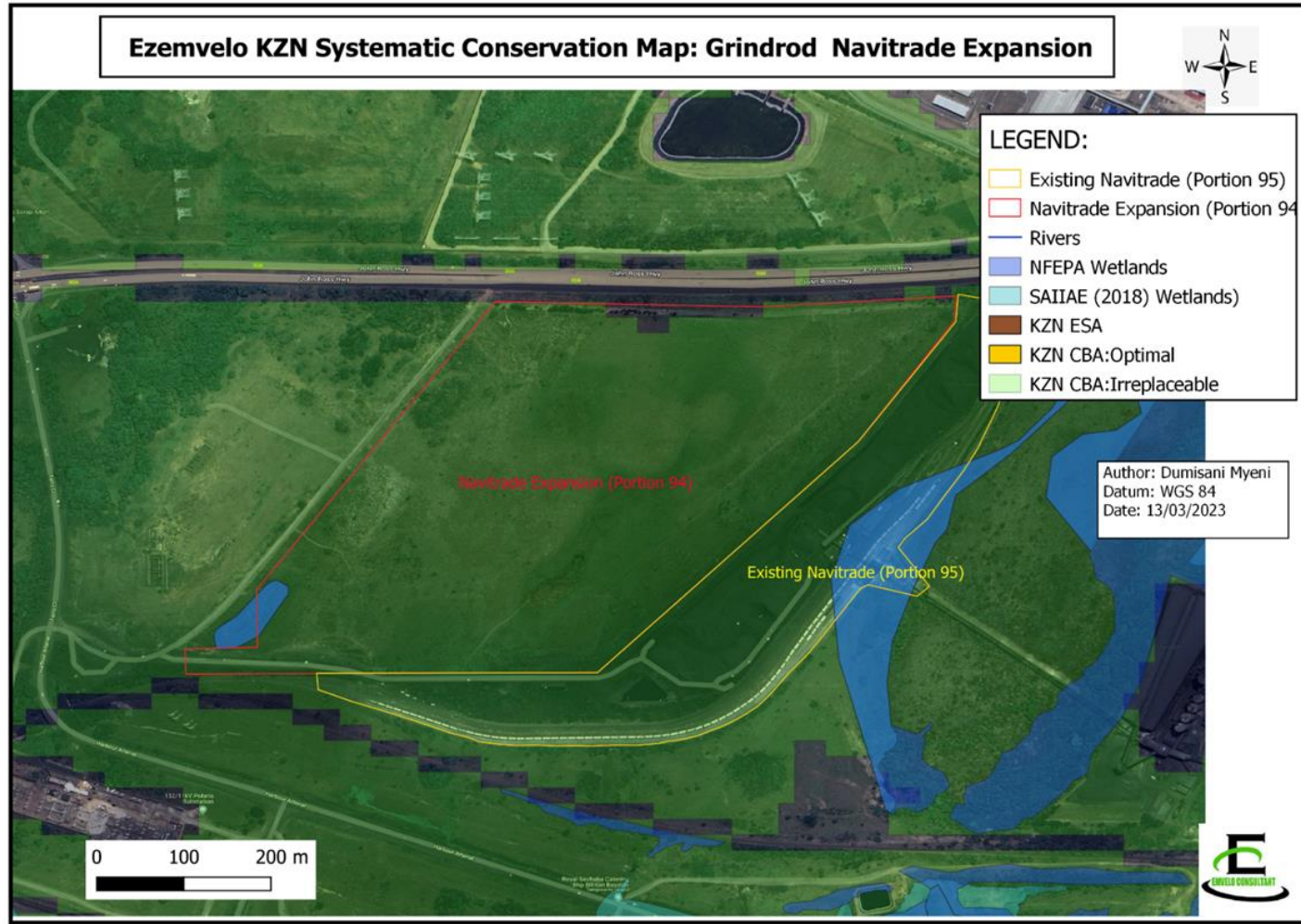


Figure 2: Ezemvelo KZN Wildlife BSP for the study site



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REGISTRATION AND COMMENT FORM

The Proposed Expansion of Grindrod Navitrade 11.6ha Portion 95 by additional 25ha of Portion 94 ERF 5333 to Increase Coal Handling and Storage Capacity at Navitrade Facility, Richards Bay, KZN.

I wish to register as an interested and affected party and / or bring to the attention of Emvelo Consultant the following information.

<u>Personal Information</u>	
Name and Surname	
Company /organization	
Physical Address	
Postal address	
Telephone:	Cell:
Email:	
We would like you to inform us on a preferred and effective means of receiving documents and communication from us.	
<u>Method:</u>	<u>Address:</u>
<u>Comments</u>	

Signature:

Date:.....