



## Kudumane Mineral Resources (Pty) Ltd (KMR)

### Minutes for the Meeting: DMRE Pre-Application Meeting

Held: Via Microsoft Teams, 17 February 2021 at 10h00

**Attendees:** Vincent Muila (DMRE)  
Tshifhiwa Nemakhavhani (KMR)  
Natasha Anamuthoo (SRK)  
Megan Kim Govender (SRK)

#### Action

#### 1 Welcome

Megan Kim Govender (MKG) welcomed everyone to the meeting and introduced attendees.

The presentation for the meeting is attached in Appendix A.

#### 2 Confirmation of agenda

The agenda was confirmed with no additional topics added.

#### 3 Welcome and opening

MKG introduced the project. The purpose of the meeting is to introduce the proposed project to the Department of Mineral Resources and Energy.

Kudumane Mineral Resources (Pty) Ltd (KMR) is an existing opencast manganese mine that wants to apply for a new Environmental Authorisation (EA). KMR currently has two approved Environmental Management Programmes (EMPrs) that require amendment and consolidation. The project will therefore entail applying for new activities and the amendment and consolidation of the existing EMPrs.

The consultant on the project is SRK Consulting.

#### 4 Current authorisations

KMR has two mining rights; one for York and Telele (Mining right NC/30/5/1/2/2/0268 MR) and one for Deon, Hotazel and Kipling (Mining Right NC/ 30/5/1/2/2/10053 MR). There are two approved EAs both issued from the Northern Cape Province Department of Environment and Nature Conservation. The first EA was approved in June 2013 for the EMPr associated with opencast activities on York and future underground mining operations on Telele. The second EA was approved in October 2015 for the Devon, Hotazel and Kipling mining right and additional activities on York and Telele.

KMR also has a Water Use Licence (WUL) that was issued in 2016 and amended under the same name in 2018.

**Action****5 Overview of proposed project**

In order to ensure the continuation of mining KMR proposes to:

- extend the existing York Pit;
- combine the existing Hotazel Pit with the neighbouring Kalagadi Mine;
- add two new pits (Kipling Pit 1 and 2); and
- mine underground on the farm Telele.

Telele already has authorisation for underground mining however new activities will be added.

The extension of the existing York and Hotazel Pits is restricted by the Ga-Mogara River on the western side. The recommended option is to construct attenuation ponds along the Ga-Mogara River upstream of the York and Hotazel Pits to capture and store a certain portion of the flood water. An investigation was done by SRK in 2020 to determine what would be the best option in terms of extending the pit and diverting the river. The recommended option that came out of the study was to construction attenuation ponds to hold back the water. This option was sent to the Department of Water and Sanitation (DWS) for comment. DWS have confirmed that SRK can commence with the Water Use Licence Application (WULA) (Confirmation received 18 November 2020).

There are several proposed key project activities that will require environmental, water and waste authorisations. These include:

- Extension of the York Pit and Hotazel Pit
- Construction of two new pits on Kipling
- Construction of two in-stream attenuation ponds which is related to the river diversion
- The stockpiling of overburden material; manganese ore; and low-grade ore
- Crushing and screening of high-grade manganese ore
- Conveyor systems
- Storage and handling of spares and dangerous goods (fuel, lubricants, explosives, etc)
- Temporary storage of domestic, industrial and hazardous waste
- Workshop, lay-down, wash bay and diesel bay areas
- Staff commuting and parking
- Change houses and ablution facilities
- First aid clinic
- Sewage treatment facilities
- Settlement ponds
- Pollution control dams
- Road and rail weigh bridges, powerlines and roads

MKG presented a layout of the proposed project indicating the approved mining rights areas and the proposed project activities. The York pit will be extended in a westerly direction and an attenuation pond will be constructed to hold back the water from the Ga-Mogara River. The pit will be mined out and rehabilitated. The same will happen for the Hotazel pit but a portion of the Hotazel pit will be mined out on Kalagadi's property. KMR is currently in negotiations with Kalagadi's management. An agreement will be in place for mining on Kalagadi's property prior to any mining activities being undertaken. The Telele property is earmarked for future underground mining.

**6 Environmental authorisation requirements**

The environmental authorisation requirements include an EA in terms of the National Environmental Management Act (Act No. 107 of 1998) for any project related listed activities. A waste management licence will also be required in terms of the National Environmental Management: Waste Act (Act No. 59 of 2008). The EMPs will have to

**Action**

be amended in terms of Section 102 of the Mineral and Petroleum Resources Development Act (Act No. 28 of 2002). A WUL will be required in terms of the National Water Act (Act No. 36 of 1998) for water uses associated with the project.

**6.1 Potential listed activities**

The project activities trigger several activities from Listing Notice 2 therefore a Scoping and Environmental Impact Assessment (EIA) will be applied for.

**6.2 Specialists studies**

The following specialist studies were identified to support the application:

- Geology
- Topography
- Soils, land use and land capability
- Biodiversity
- Surface water
- Air Quality
- Noise
- Visual
- Wetlands
- Aquatic ecology
- Groundwater
- Cultural and heritage resources
- Socio-economics
- Closure

No other specialist studies were asked to be included.

**7 Stakeholder engagement**

The stakeholder engagement process will be undertaken in terms of NEMA 2014 Regs. It will be a consolidation process and will include the consultation with the following:

- Land owners;
- Interested and affected parties; and
- Government departments

The key stakeholder engagement process for the per-application phase will involve pre-application authority meetings which has been done with DWS and now the meeting we're having with DMRE; identification of stakeholders; introductory meeting with key stakeholders; and project announcement and I&AP registration. The Scoping and EIA phase will involve the distribution of the draft scoping report for public comment and public meetings if required; and the distribution of the Draft EIA report for public comment and public meetings if required.

**8 Integrated authorisation process**

An integrated environmental authorisation process will be followed. SRK will apply for a Scoping and EIA for new activities and for the amendment and consolidation of KMR's current EMPs. A WUL will be applied for and will run concurrently with the Scoping and EIA process. The public participation process will be an integrated process to include both the Scoping and EIA and WULA.

The WULA and Scoping and EIA process will follow an aligned 300 day process to ensure that we try and get both authorisations at the same time.

**9 Discussion**

Vincent Muila (VM): What is the arrangement between Kalagadi Mine and KMR for the mining of the Hotazel Pit. Tshifhiwa Nemakhavhani: An agreement is currently being discussed with Kalagadi and KMR. The agreement will be signed by both parties.

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VM: When are you planning on submitting this application? MKG: The application will be submitted in approximately two months around June or July. VM: The application will be lodged in terms of Section 102? MKG: Yes.

VM: There are no issues, you can submit the application and if there is any information outstanding DMRE will request this. MKG: Thank you. Do we have DMRE's permission to continue? VM: Yes. But also note that because of Covid-19 there might be delays. When does KMR expect the environmental authorisation? MKG: We want to try and get the approved authorisations as soon as possible, taking Covid-19 into consideration and DMRE's commitments. VM: Will that be this year? MKG: It won't be possible this year in terms of legislated timelines, therefore the EA is expected early next year. VM: Yes, we are already in February so early next year is fine.

VM: DMRE will wait for the application and take it from there. If a pre-inspection meeting is required DMRE will be in contact.

VM: Will there be two applications for the two mining rights? MKG: It will be a consolidation, amendment and the addition of new activities.

MKG: Meeting minutes will be distributed to ensure everything discussed was interpreted correctly.

Minutes taken by: Megan Kim Govender, SRK Consulting

## **Appendix A: Presentation**

## Integrated Environmental Authorisation Process for Kudumane Mineral Resources Pit Expansion and River Diversion



DMRE Pre-Application Meeting

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## Agenda

01	Welcome and Opening
02	Project Location
03	Overview of Proposed Project
04	Environmental Authorisation Requirements
05	Summary of Potential Listed Activities
06	Identified Specialist Studies
07	Stakeholder Engagement
08	Integrated Environmental Authorisation Process
09	Discussion and Questions

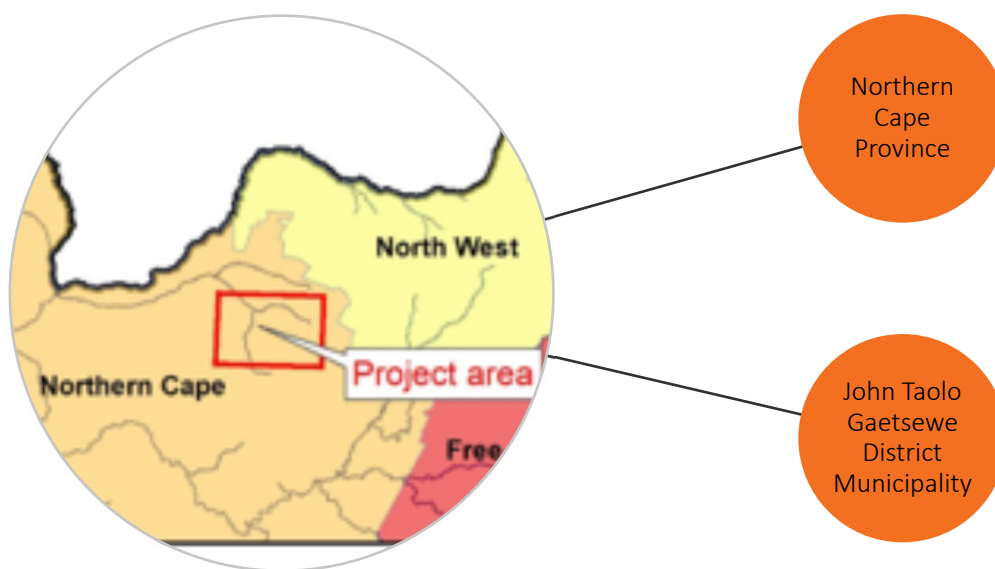
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## Welcome and Opening

- Purpose: Introduce the proposed project
- Applicant: Kudumane Manganese Resources (Pty) Ltd (KMR)
- KMR is an existing opencast manganese mine that wants to apply for a new Environmental Authorisation
- KMR has two approved Environmental Management Programmes (EMPrs) that requires amendment and consolidation
- Consultant: SRK Consulting (Pty) Ltd (SRK)

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## Project Location



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## Current Authorisations

### Two mining rights

- NC/30/5/1/2/2/0268 MR for York and Telele; and
- NC/ 30/5/1/2/2/10053 MR for Devon, Hotazel and Kipling.

### Two approved Environmental Authorisations (EA)

- EA from the Northern Cape Province Department of Environment and Nature Conservation (DENC) (Reference Number: NC/KGA/JTG/HOT-KUR/16/2009 approved on 13 June 2011) for approved EMPr (DMR Reference: NC/30/5/1/2/2/0268 MR) for opencast (York) and future underground mining operations (Telele), associated residue handling and disposal facilities, crushing and screening plant, water management facilities, rail and road transport infrastructure and various support infrastructure and services.
- EA from DENC (Reference Number: NC/EIA/05/JTG/HOT/KUD/2013 approved on 21 October 2015) for approved EMPr (DMR Reference: NC/ 30/5/1/2/2/10053 MR) added MR for Devon, Hotazel and Kipling with additional infrastructure to the York /Telele operation and additional activities to the new MR areas.

## Current Authorisations

### Water Use Licence (WUL) and Amended WUL

- WUL No. 07/D41K/ABCFGIJ/4533 issued on 29th May 2016; and
- Amended WUL (Issued under the same WUL No.) issued on 23 July 2018.



## Overview of Proposed Project

- To ensure the continuation of mining KMR proposes to:
  - Extend the existing York Pit
  - Combine the existing Hotazel Pit with the neighbouring Kalagadi Mine
  - Add two new pits (Kipling Pit 1 and 2)
  - Mine underground on the farm Telele.
- The extension of the existing York and Hotazel Pits is restricted by the Ga-Mogara River on the western side
- The recommended option is to construct attenuation ponds along the Ga-Mogara River upstream of the York and Hotazel Pits to capture and store a certain portion of the flood water.

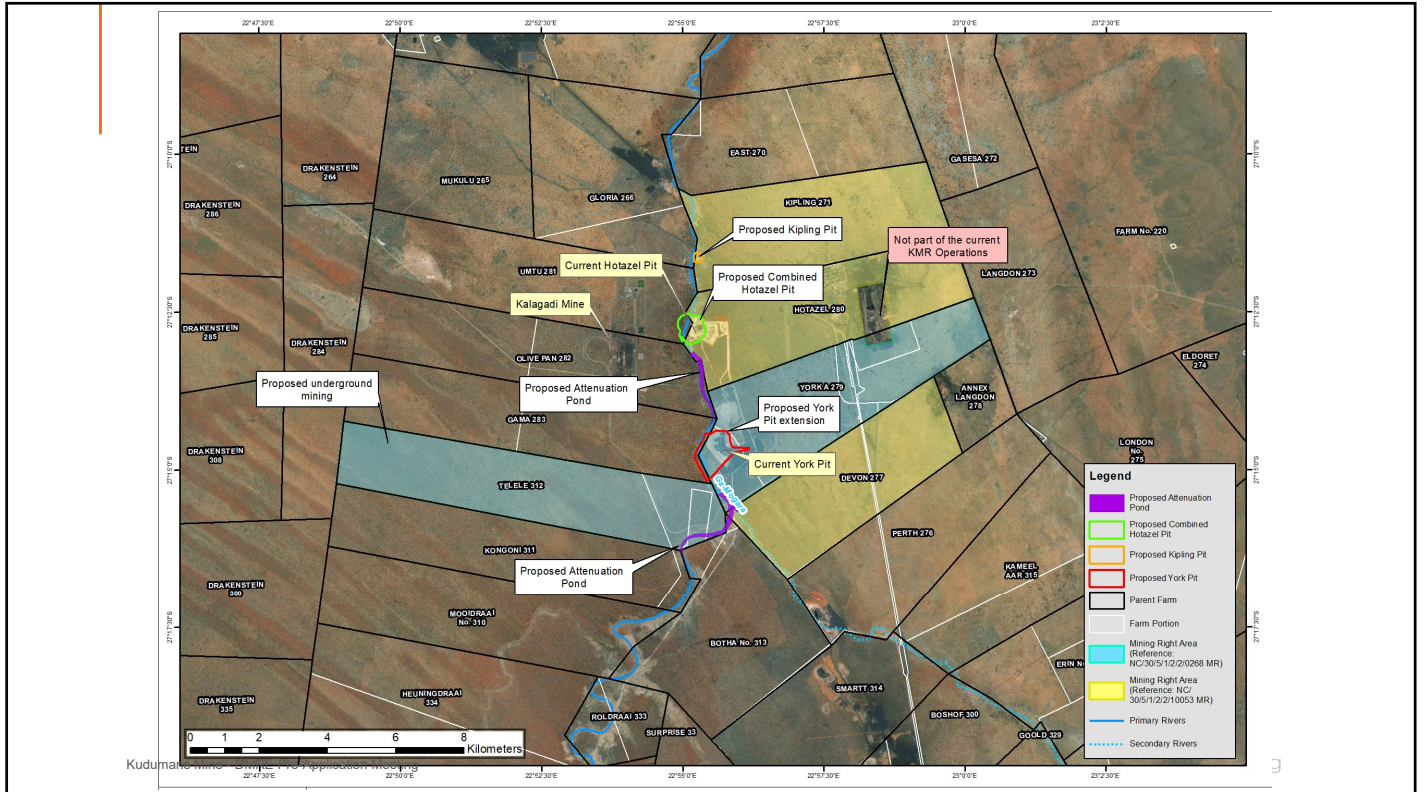
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## Overview of Proposed Project

- The proposed key project activities that will require environmental, water and waste authorisations include:
 

<ul style="list-style-type: none"> <li>○ Extension of the York Pit and Hotazel Pit</li> <li>○ Construction of new Kipling Pits 1 and 2</li> <li>○ Construction of two in-stream attenuation ponds (related to the river diversion)</li> <li>○ Blasting, loading, hauling and stockpiling of overburden material</li> <li>○ Blasting, loading, hauling and stockpiling of manganese ore</li> <li>○ Stockpiling of low-grade ore</li> <li>○ Crushing and screening of high-grade manganese ore</li> <li>○ Conveyor systems</li> <li>○ Storage and handling of spares and dangerous goods (fuel, lubricants, explosives, etc)</li> </ul>	<ul style="list-style-type: none"> <li>○ Temporary storage and handling of domestic, industrial and hazardous waste</li> <li>○ Workshop, lay-down, wash bay and diesel bay areas</li> <li>○ Staff commuting and parking</li> <li>○ Change houses and ablution facilities</li> <li>○ First aid clinic</li> <li>○ Sewage treatment facilities</li> <li>○ Settlement ponds</li> <li>○ Pollution control dams</li> <li>○ Road and rail weigh bridges, powerlines and roads</li> </ul>
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## Environmental Authorisation Requirements

Applicable legislation	Authorisation required	Competent Authority
National Environmental Management Act (Act No. 107 of 1998) (NEMA)	EA for any project related listed activities stipulated in the NEMA Environmental Impact Assessment (EIA) Regulations of 2014, as amended in 2017	DMRE Kimberley
National Environmental Management: Waste Act (Act No. 59 of 2008) (NEM:WA)	WML for any project related waste activities stipulated in NEM:WA GNR 291 of November 2013	DMRE Kimberley
Mineral and Petroleum Resources Development Act (Act No. 28 of 2002) (MPRDA)	Amended EMPr for any amendments the proposed project will have on the Mining Work Programme and the EMPr in accordance with Section 102 of the MPRDA	DMRE Kimberley
National Water Act (Act No. 36 of 1998) (NWA)	WUL for any project related water uses stipulated under Section 21 of NWA	DWS Kimberley

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## Summary of Potential Listed Activities

NEMA	
Listing Notice 1 (GNR983) Requiring a Basic Assessment	Listing Notice 2 (GNR 984) Requiring a Scoping and Environmental Impact Assessment
Activity 9: The development of infrastructure exceeding 1000 meters in length for the bulk transportation of water or storm water	Activity 6: The development of facilities or infrastructure for any process or activity which requires a permit or license or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent
Activity 12: The development of dams or weirs, where the dam or weir, including infrastructure and water surface area, exceeds 100 square metres; or infrastructure or structures with a physical footprint of 100 square metres or more; where such development occurs within a watercourse;	Activity 15: The clearance of an area of 20ha or more of indigenous vegetation
Activity 19: The infilling or depositing of any material of more than 10m <sup>3</sup> into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 10m <sup>3</sup> from a watercourse	Activity 16: The development of a dam, where the highest part of the dam wall, as measured from the outside toe of the wall to the highest part of the wall, is 5 meters or higher or where the high-water mark of the dam covers an area of 10 hectares or more
Activity 27: The clearance of an area of 1 ha or more, but less than 20ha of indigenous vegetation	Activity 19: The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including

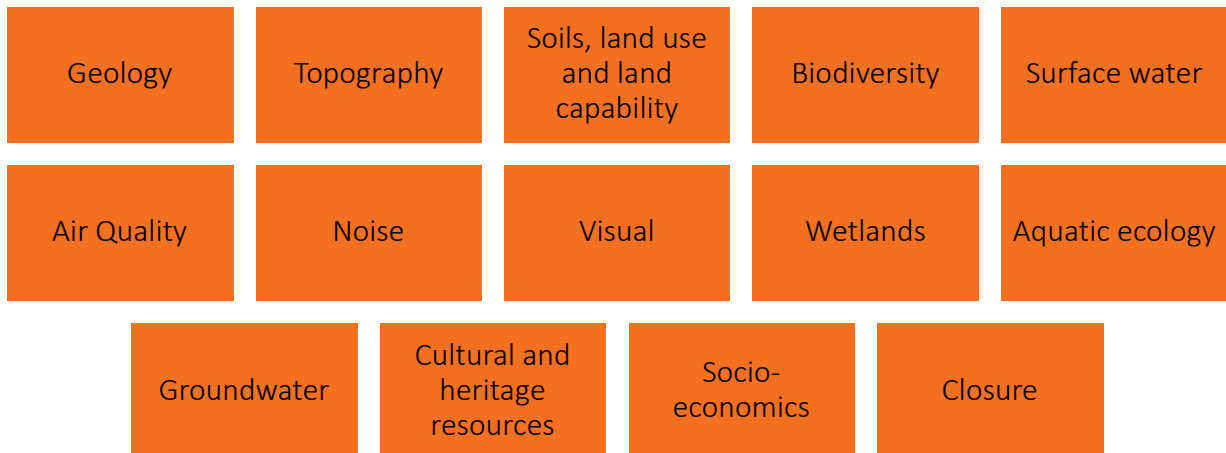
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## Summary of Potential Listed Activities

NEM:WA
Environmental Impact Assessment (NEM:WA) GNR 921 of 29 November 2013 - Category B - Activities requiring an environmental authorisation subject to a EIA
Activity 11: The establishment or reclamation of a residue stockpile or residue deposit resulting from activities which require a mining right, exploration right or production right in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).

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## Identified Specialist Studies



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## Stakeholder Engagement

Stakeholder engagement will be undertaken in terms of the NEMA EIA 2014 Regulations and will include consultation with the following:

- Land owners;
- Interested and affected parties; and
- Government departments:
  - Department of Agriculture;
  - Department of Rural Development and Land Reform;
  - Cooperative Governance, Human Settlements /and Traditional Affairs;
  - Northern Cape Department of Economic Development, Environment and Tourism;
  - Department of Water and Sanitation;
  - John Taolo Gaetsewe District Municipality; and
  - South African Heritage Resources Agency

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## Stakeholder Engagement

### Key Stakeholder Engagement Processes

- Pre application phase
  - Pre-application authority meetings;
  - Identification of stakeholders;
  - Introductory meeting with key stakeholders; and
  - Project announcement and I&AP registration.
- Scoping & EIA/EMPr Phase
  - Draft Scoping Report public comment and public meeting; and
  - Draft EIA/EMPr public comment and public meeting.

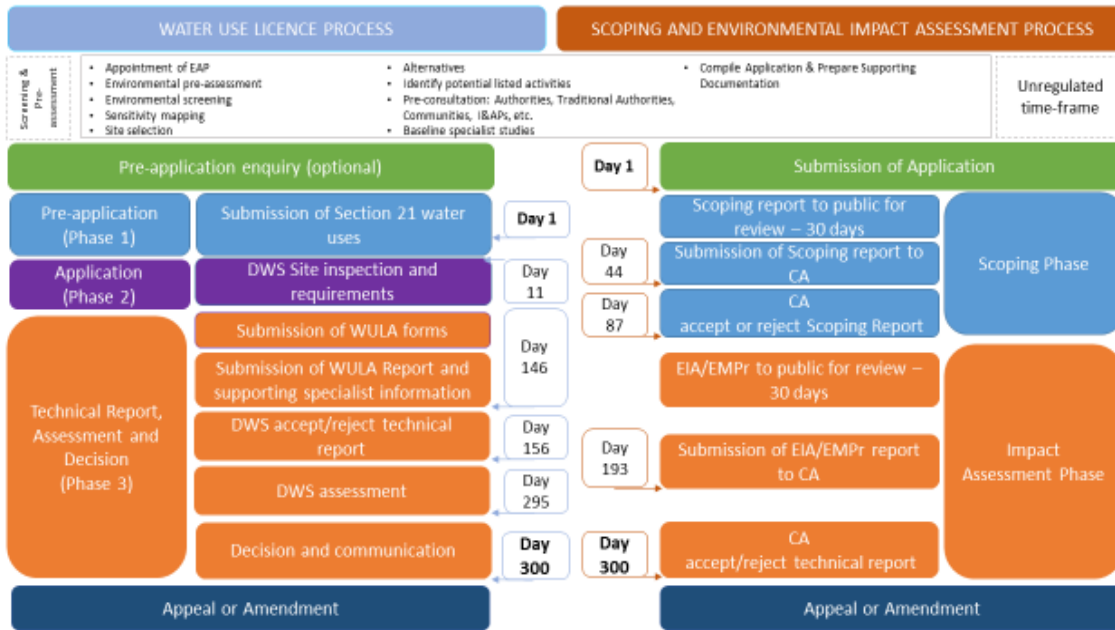
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## Integrated Environmental Authorisation Process

- SRK will apply for a Scoping and Environmental Impact Assessment for new activities and for the amendment and consolidation of KMR's current EMPs
- A WUL will be applied for and will run concurrently with the Scoping and Environmental Impact Assessment process
- An integrated public participation process will be undertaken

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## Integrated Environmental Authorisation Process



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## Discussion and Questions



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