

Comments and Responses Report (CRR)

Application for Environmental Authorisation and a Mining Permit for the
Mining of Sand on Portion 8 of Farm Kruisfontein 193, Humansdorp,
Eastern Cape

GCS Ref. No: 21-0703

DMRE Ref. No: EC30/5/1/3/2/10704MP

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1. OVERVIEW OF THE PUBLIC PARTICIPATION PROCESS

This Comments and Responses Report (CRR) provides a summary of the comments, questions and issues raised by stakeholders since the announcement of the application in February 2022, and availability of the Draft Basic Assessment Report for comment in June 2022, the application for an Environmental Authorisation in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), and a Mining Permit in terms of the Mineral and Petroleum Resources Development Act, 2002 (MPRDA) for the mining of sand on Portion 8 of Farm Kruisfontein No 193, Humansdorp, Eastern Cape. The applicant is Kouga Sand (Pty) Ltd.

2. PURPOSE OF PUBLIC PARTICIPATION

The primary objectives of the PPP are to:

- Identify key stakeholders (i.e. Non-Governmental Organisations [NGOs], municipalities, government departments, traditional authorities) and I&APs (i.e. surrounding businesses, residents, landowners, interested members of the public);
- Inform I&APs about the proposed Application for EA;
- Establish lines of communication between I&APs and the project team to deal with potentially contentious issues;
- Provide ample opportunity to all parties to exchange information and express their views and raise issues and concerns; and
- Obtain contributions of I&APs and ensure that all issues, concerns and questions raised are fully documented and assessed as part of the BA process.

3. PUBLIC PARTICIPATION PROCESS

This section provides a short summary of the various public participation activities undertaken in support of the abovementioned application.

3.1 Identification of stakeholders

A stakeholder database or list of I&APs was compiled and was updated as the process unfolded and as more I&APs registered. The database was compiled: a) using lists of contact details of previous application processes in the area; b) using information provided by stakeholders in response to advertisements published, site notices placed and/or emails sent; and c) from information provided by I&APs in response to an invitation to provide contact details of other stakeholders which may have been interested or affected. A list of the stakeholder database is appended (Appendix A).

3.2 Announcement of the regulatory processes

The public participation process included the following activities:

- An electronic I&AP database was developed, which was maintained and updated throughout the project (Appendix A);
- An English advertisement for the registration and participation of I&APs was placed in the Kouga Express newspaper on 17 February 2022 (Appendix B);
- Two English notice boards detailing information about the project and the BA Process, as well as invitation to register as I&APs, were placed at three strategic points around the development site on 15 February 2022. All notice boards were designed to the specification of Section 54 (3) of the NEMA EIA Regulations (Appendix D)

3.3 Comments and Responses Report

All comments received during the application process have been captured in a Comments and Responses Report (CRR). This CRR was updated on a continuous basis and is to be presented to the authorities and other I&APs together with the consultation and final reports as a full record of issues raised, including responses on how the issues were considered during the application process. Refer to Appendix H for this report.

3.4 Review of the Draft Basic Assessment Report

The Draft Basic Assessment Report (DBAR) was made available for public comment for 30 days, from **31 May 2022 to 1 July 2022** (30 days).

The availability of the Report for review and comment was announced to stakeholders through the following means:

- Email notifications were circulated to all registered I&APs on the database (as applicable) inviting comments until 1 July 2022 (Appendix C).
- The report was available electronically via the GCS Website (www.gcs-sa.biz) or on a CD upon request.

3.5 Review of the Final Basic Assessment Report

The Final Basic Assessment Report was prepared after the comment period of the Draft Report has expired. The availability of the Final Report and where copies of the Final Report can be obtained for review and comment has been communicated in a notification letter to registered I&APs via email.

The Final Basic Assessment Report and its accompanying reports were published on the project website.

4. COMMENTS RECEIVED FROM I&APS

The following table records all comments received from I&APs to date, and the responses.

Comments	Contributor	GCS response
1. Invitation to register placed in Kouga Express Newspaper and Site Notices erected.		
<p>I act on behalf of the owner of The Remainder of Portion 10 of the Farm 193 Kruisfontein being the Hein Nel Familie Trust.</p> <p>Your undated above notice has today been brought to my attention by an adjacent interested party.</p> <p>No other form of notification was received.</p> <p>Kindly furnish me with a contact address at the DMRE in order that I can ensure that my objection to the application is noted.</p> <p>Kindly also furnish me with the full application as the notice which you sent out is deficient and misleading as will be set out below.</p> <p>Kindly acknowledge receipt and confirm that my objection has been noted against the application.</p>	<p>Heinrich Nel Email 17 February 2022</p>	<p>Your email below is acknowledged and recorded. You will be registered as an interested and affected party in this application process.</p> <p>For clarity, please find the site plan for the application area attached.</p> <p>All further information regarding the application will be forwarded to you.</p>
<p>Statement of interest and objection.</p> <ol style="list-style-type: none"> 1. The notice referred to above does not identify the relevant property with any measure of clarity. 2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions. The Google Maps Photo gives no coordinates. 3. I know the area and can see that it is close to my client's farm but cannot identify the property. I suspect that it is adjacent. 4. If that is the case, I wish to record that the adjacent owner has made use of unregistered alien labourers which has perpetrated a housebreaking incident on my client's property in the past. Any escalation in occupancy may exacerbate this threat. 5. The description of the access road is incorrect as the area is served by a provincial dirt road and not a "farm road" as indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such. 		<ol style="list-style-type: none"> 1-3. The purpose of the site notice was to inform stakeholders of the proposed project in the area. More explicit detail was made available in the DBAR. 4. It can be confirmed that the Applicant for the Mining Permit has no intention of making use of any unregistered foreign labour. 5. Noted, this has been corrected in the DBAR. 6-7. Noted. The applicant has undertaken to assist where feasibly possible to repair and maintain the road. 8. Noted.

<p>6. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective handle additional traffic in the form of heavy trucks.</p> <p>7. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road.</p> <p>8. I reserve my client's rights to amplify its objections to the application upon receipt of the full application.</p> <p>Kindly acknowledge receipt hereof.</p>		<p>Your comments have been received and will be included in the application process.</p>
<p>I represent Mooville Pty Ltd as Director. As affected party I would like to object to this matter aswell.</p> <p>I agree to all reasons mentioned by Mr.Nel as well as this area has been a farming community for many many years and industrialising this area does not sit well with current property owners.</p> <p>Could you please register us as an affected and interested party.</p>	<p>Willem van Vuuren Email 21 February 2022</p>	<p>You will be added to the Interested and Affected Party database and will be provided with all information that is generated by the application.</p>
<p>To whom it may concern</p> <p>As the developers of Honeyville Eco village and Nature Reserve We would like to formally and officially object to the proposed application / development on the above mentioned property.</p> <p>We currently own the Honeyville Nature reserve and eco village development, and this will bring serious unwanted traffic and noise to the area, which directly affects and contradicts our conservation and rehabilitation values and partnerships with Eastern cape parks board, and other affiliates.</p> <p>We have very rare and precious wildlife and doing a lot of work to conserve and keep this intact which will be disturbed through these activities.</p> <p>We currently have homeowners who bought into the peace and quiet that the nature reserve and eco village offers.</p> <p>Additionally, the road is currently in a terrible state and cannot handle any additional movement and heavy trucks, as well human activity in the area.</p>	<p>Zak Venter Email 21 February 2022</p>	<p>We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.</p> <p>Your email below will also be captured on the Comments and Responses Report that will be submitted with the Application.</p> <p>We note that the Honeyville Eco Village and Nature Reserve is located some 10.35km to the southeast of the proposed site. Due to the scale of the proposed mine, it is not anticipated that the activities will impact on the Nature Reserve. A maximum of 4 truckloads of sand will be transported per day.</p>

<p>Kindly acknowledge receipt and confirm that my objection has been noted against the application.</p>		
<p>I am the owner of Portion 2 of the farm Kruisfontein number 193 in the Kouga Municipality, District Humansdorp, Eastern Cape Province.</p> <p>I herewith wish to object to the application for mining rights as per the reference above.</p> <p>Kindly acknowledge receipt and confirm that my objection has been noted against the application.</p>	<p>Hester van Rooyen Letter dated 22 February 2022 sent by email on 23 February 2022</p>	<p>We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.</p> <p>Your email below will also be captured on the Comments and Responses Report that will be submitted with the Application.</p>
<p>Statement of interest and objection:</p> <ol style="list-style-type: none"> 1. The notice referred to above does not identify the relevant property with any measure of clarity. 2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions. 3. The Google Maps Photo gives no coordinates. 4. I know the area and can see that it is close to my farm but cannot identify the property. I suspect that it is adjacent. 5. If that is the case, I wish to record that the adjacent owner has made use of unregistered alien labourers which has perpetrated a housebreaking incident on a neighbouring property in the past. Any escalation in occupancy may exacerbate this threat. 6. The description of the access road is incorrect as the area is served by a provincial dirt road and not a “farm road” as indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such. 7. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman’s perspective, handle additional traffic in the form of heavy trucks. 8. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road. 9. The area is a traditional rural farming community and the industrialisation thereof by mining activities will affect its character permanently. 		<ol style="list-style-type: none"> 1-4. Please find attached a map indicating the location of the Application Area. 5. It can be confirmed that the Applicant for the Mining Permit has no intention of making use of any unregistered foreign labour. Furthermore, a maximum of 3 workers will be required and will not stay on site. 6. This has been corrected in the Draft Basic Assessment Report and Final Basic Assessment Report. 7-8. The road is designed according to the specifications of a provincial road. The applicant will assist where feasibly possible to repair and maintain the road. 9. The Mining Permit is valid for a period of 2 years with an option to extend for a year and another year, making it potentially valid for a maximum period of 4 years. In accordance with the requirements of the Mining Permit Application as well as the Application for Environmental Authorisation, the area will need to be rehabilitated upon completion of all sand mining activities. The impact of the operations will therefore not be permanent. Furthermore, the Mining Permit area is limited to a 5ha area which is relatively small area in the larger landscape.

<p>10. The area has indigenous fynbos and mining activities will damage the fragile ecosystem.</p> <p>I reserve my rights to amplify my objections to the application upon receipt of the full application.</p>		<p>10. It is acknowledged that the larger area surrounding the application site contains some fynbos elements, however, there are none of these elements present on the site. In addition, the area does not fall in an endangered or critically endangered ecosystems as defined in the National Environmental Management: Biodiversit Act (Act No. 10 of 2004). Furthermore, the vegetation on the study area is classified as Kouga Grassy Sandstone Fynbos (FFs28) by National Vegetation Map (2012) managed by the South African National Biodiversity Institute (SANBI). The SANBI reference places the vegetation type in the Eastern Fynbos-Renosterveld Bioregion within the Fynbos Biome and classifies the vegetation type as having a “least threatened” conservation status. It was however noted by the specialist who conducted the specialist assessment that this vegetation type was not present on the site, due to the highly degraded nature of the vegetation as a result of alien invasive plant infestation.</p> <p>Your comment is noted.</p>
<p>I am the owner of Portion 8 of the Farm Quarrie Kraal Nr 149 in the Kouga Munisipaliteit, District Humansdorp, Eastern Province.</p> <p>I herewith wish to object to the application for mining rights next to my farm as per the reference above.</p> <p>Kindly acknowledge receipt and confirm that my objection has been noted against the application.</p>	<p>Jan van Rooyen Letter dated 23 February 2022 sent by email on 23 February 2022</p>	<p>We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.</p> <p>Your email below will also be captured on the Comments and Responses Report that will be submitted with the Application.</p>
<p>Statement of interest and objection.</p> <ol style="list-style-type: none"> 1. The notice referred to above does not identify the relevant property with any measure of clarity. 2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions. The Google Maps Photo gives no coordinates. 3. I know the area and can see that it is close to my client’s farm but cannot identify the property. I suspect that it is adjacent. 4. The description of the access road is incorrect as the area is served by a provincial dirt road and not a “farm road” as 		<p>1-3. Please find attached a map indicating the location of the Application Area.</p> <p>4. This has been corrected in the Draft Basic Assessment Report and Final Basic Assessment Report.</p>

<p>indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such.</p> <ol style="list-style-type: none"> 5. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective handle additional traffic in the form of heavy trucks. 6. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road. 7. I reserve my client's rights to amplify its objections to the application upon receipt of the full application. 8. The area is a traditional rural farming community and the industrialisation thereof by mining activities will effect its character permanently. 		<p>5-6. The road is designed according to the specifications of a provincial road. The applicant will assist where feasibly possible to repair and maintain the road.</p> <p>7. Comment is noted.</p> <p>8. The Mining Permit is valid for a period of 2 years with an option to extend for a year and another year, making it potentially valid for a maximum period of 4 years. In accordance with the requirements of the Mining Permit Application as well as the Application for Environmental Authorisation, the area will need to be rehabilitated upon completion of all sand mining activities. The impact of the operations will therefore not be permanent. Furthermore, the Mining Permit area is limited to a 5ha area which is relatively small area in the larger landscape</p>
<p>I am the owner Portion of the Property known as Farm Oukraal Kraal Nr 148 in the Kouga Munisipaliteit, District Humansdorp, Eastern Province.</p> <p>I herewith wish to object to the application for mining rights next to my farm as per the reference above.</p> <p>Kindly acknowledge receipt and confirm that my objection has been noted against the application.</p>	<p>Ansa de Jager Email 28 February 2022</p>	<p>We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.</p> <p>Your email below will also be captured in the Comments and Responses Report that will be submitted with the Application.</p>
<p>Statement of interest and objection.</p> <ol style="list-style-type: none"> 1. The notice referred to above does not identify the relevant property with any measure of clarity. 2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions. The Google Maps Photo gives no coordinates. 3. I know the area and can see that it is close to my client's farm but cannot identify the property. I suspect that it is adjacent. 4. The description of the access road is incorrect as the area is served by a provincial dirt road and not a "farm road" as indicated .The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such. 		<p>1-3. Please find attached a map indicating the location of the Application Area.</p> <p>4. This has been corrected in the Draft Basic Assessment Report and Final Basic Assessment Report.</p> <p>5-6. The road is designed according to the specifications of a provincial road. The applicant will assist where feasibly possible to repair and maintain the road.</p>

<p>5. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective handle additional traffic in the form of heavy trucks.</p> <p>6. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road.</p> <p>7. I reserve my client's rights to amplify its objections to the application upon receipt of the full application.</p> <p>The area is a traditional rural farming community and the industrialisation thereof by mining activities will effect its character permanently.</p>		<p>7. Comment is noted.</p> <p>The Mining Permit is valid for a period of 2 years with an option to extend for a year and another year, making it potentially valid for a maximum period of 4 years. In accordance with the requirements of the Mining Permit Application as well as the Application for Environmental Authorisation, the area will need to be rehabilitated upon completion of all sand mining activities. The impact of the operations will therefore not be permanent. Furthermore, the Mining Permit area is limited to a 5ha area which is relatively small area in the larger landscape.</p>
<p>I here with wish to object to the application to mining rights on farm Kruisfontein number 193 as per the reference above.</p> <p>Kindly acknowledge receipt and confirm that my objection has been noted against the application.</p>	<p>Maryna Erasmus Letter sent by email 21 March 2022</p>	<p>We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.</p> <p>Your email below will also be captured in the Comments and Responses Report that will be submitted with the Application.</p> <p>Please find attached a map indicating the location of the Application Area.</p>
<p>Statement of interest and objection:</p> <p>1. There is not sufficient water on the applicant's farm nor to any adjacent properties to do any dust control to the mining area and the access road. The said area does have significant high wind speeds and the removal of any vegetation and increase of traffic will increase dust pollution to the area.</p> <p>2. The access road will not be sufficient to handle heavy traffic. The existing access road is not wide enough to handle double lane traffic and this will increase the possibility for accidents on the road. The current road is also not maintained by the local municipality and the local residents can barely use the road in its current state. As per the notice I don't see any maintenance plan to upgrade the access road.</p> <p>3. As per the Google maps photo it does not show the exact area where the mining will take place. As per my understanding this will be adjacent to portion 8, farm Quarrie Kraal, Number 149, Kouga municipality. This area will not be sufficient as there is constant</p>		<p>1. As mentioned in Section 8 of the DBAR and in the EMPr, vegetation clearance will be kept to a minimum, and will be rehabilitated as soon as practicable. The area is already sparse in vegetation due to its disturbed state.</p> <p>2. The road is designed according to the specifications of a provincial road. The applicant will assist where feasibly possible to repair and maintain the road. On site, the existing farm access road off the provincial road.</p> <p>3. The proposed site is located on Portion 8 of Farm Kruisfontein, No 198. The purpose of the site notice</p>

<p>livestock next to this area. The existing boundary fence will not be sufficient as an increase in people can lead to theft in the community.</p> <p>No specific coordinates have been given on the notice.</p> <p>4. As it stands the area is very quiet and with the increase of heavy construction vehicles to this area, this will be a huge impact on noise pollution.</p> <p>5. The local residents and myself preserve the nature and wildlife of this area, therefore I feel that the increase of people, construction vehicles, dust and noise will have a negative effect on the nature and wildlife wellbeing.</p> <p>As per my reasons above, I object to any mining as per notice.</p>		<p>4 -5. All impacts have been assessed in Section 8 of the Draft BAR and appropriate management and mitigation measures have been indicated in the Draft BAR and the EMPr.</p>
2. Confirmation of Contact for the local Khoisan Community		
<p>You can use the details below to register us on your database and you can use my e-mail address to forward any notifications as well as Gavin's reports to enable us to submit comments with regard to these applications.</p> <p>I have cc'd our chairperson: Ms. Cynthia August (who is also a ward councillor in Hankey) in this email.</p>	<p>Kobus Reichert Email response to GCS' enquiry 24 March 2022</p>	<p>Thank you for the details.</p> <p>We have added you both to our database, and will forward you the reports for comment when available.</p>
3. Comments on the DBAR		
<p>Attached please find my objections together with those of Jan and Hester Van Rooyen.</p> <p>Kindly acknowledge receipt and confirm that it will be lodged.</p>	<p>Heinrich Nel Letter sent by email 27 June 2022</p>	<p>Your letters are acknowledged and will be included in the application.</p> <p>You will be kept informed of any updates regarding the application.</p>
<p><u>General Objections to the proposed development:</u></p> <p>1. Kindly refer to the objections of Jan and Hester Van Rooyen attached hereto. In addition I wish to raise the following general objections.</p> <p>2. I wish to emphasise that I am a direct neighbour to the relevant property. I know the area intimately and have been living on the adjacent property since 2007.</p> <p>3. At that time the only activity which took place on the proposed mining property was livestock farming by the previous owner.</p> <p>4. The present owner subsequently purchased the farm some 10 years ago and started off with milk goat farming and cheese</p>		<p>1 - 6. Comments are noted.</p>

<p>production. When this ended some years ago, he started to make a living from charcoal production by removing and processing the alien wattle vegetation which had been allowed to spread over a large area due to bad soil control.</p> <p>5. There is no local labour, and in the process, labour had to be imported. This has caused two break ins into my house. There is no access to shops and no existing proper housing for any labourers.</p> <p>6. The geographical area is of a quiet rural farming nature and its greatest attribute is the peace and ambient quiet. The road access is served by a sub-divisional dirt road of some 20 km which is not maintained and in a shocking state of repair. I drive an Amarok double cab and have last week at 68,000 km on the clock replaced my tyres for the third time. This gives an indication of the condition of the road.</p>		
<p><u>Need and Desirability</u></p> <p>7. The whole Kouga area is replete with sand and suitable for sand mining. Sand can literally be obtained on industrial scale everywhere. On my farm for instance, large sand deposits are present. Not everybody however chooses to establish sand mines in a traditional rural livestock grazing area as is the case with this applicant. There are numerous better and more suitable areas where to establish sand mining activities where there is proper access with proper roads as is not the case with the proposed mining area.</p> <p>8. It is very noteworthy that the applicant in the EMP does not accentuate the deficient access road and does not attempt to address the fact that even with its present use the area is served with a very badly maintained road which is suitable only for traditional farming activity usage and not industrial mining activities.</p> <p>9. The impact on the road by heavy duty trucks and added road activities is nowhere addressed. The added activities under present conditions will likely make the road unusable to other properties and totally inaccessible to other landowners.</p> <p>10. At present about 20 owners make use of the road and as it is the road is a hazard. No provision is made for ongoing repair and maintenance of the road by the miners. To argue that most of the road is a Provincial Road, which it is not as it is a sub-divisional road, is to shirk the obvious obligation to attend to the maintenance</p>		<p>7. Your comment is noted. The applicant does not have access to any of the “numerous better and more suitable areas” for the sourcing of that has been mentioned.</p> <p>8 - 10. It is assumed that the road that is referred to is the Provincial District Gravel Road that provides access to the larger farming community. This road will be used by the general community in the area as well as a several large-scale farming activities, least of all the large citrus farm in the area. The upkeep of this road is the responsibility of the Regional District Roads Department in Humansdorp. The applicant has agreed that he will assist in the rehabilitation of the road where it can be proved that damage has been caused by the vehicles transporting sand from the Mining Permit area. As with all members of the community that the road services, the applicant will contribute income tax to the State coffers which should be used for the upkeep of the road. In addition, the relevance of the classification of the road is not as important as the entity that is responsible for the upkeep of the “sub-divisional road”, who is the Provincial Department of Roads and Transport with its district office in Humansdorp. If the quality of the road dangerous it is suggested that this is reported to the relevant district office. Finally, it is envisaged that 4 truckloads of sand will be hauled along the road on a daily basis which is not considered a major increase of road use.</p>

<p>and upkeep of the road if you know full well that you will use heavy trucks and that you will damage the road for other road users. To fail to deal with maintenance and upkeep of the road in the report is to ignore the factual situation that the road is not maintained by the authorities.</p>		
<p><u>Construction Phase</u></p> <p>11. Very few people live in the geographical area and there are no human settlements close by. The area is of a rural nature, fit only for traditional farming activities. To refer to “Job Creation” as being a reason for establishing an industrial mining activity in the area is a ruse and pandering to sentiment which is out of place.</p> <p>12. Any job creation would involve relocation of external labour to the area with the associated social problems accompanying such activity. In the past the owner has made use of unregistered foreign labour which speaks for itself.</p> <p>13. There are no local people for whom employment is to be created and the applicant is challenged to provide a list of any local inhabitants who would be employed.</p>		<p>11. The operation will provide employment for approximately 3 workers, who will not be housed on site.</p> <p>12 - 13. The applicant will bring the required labour to the sand mining area on a daily basis and will not make use of any ineligible labour.</p>
<p><u>Operational Phase</u></p> <p>14. What has been stated above is also relevant hereto. The statement that the development would be to the “Benefit of the local Municipality by reducing the cost of sand” however deserves some comment. The cost of sand from the proposed area would have to factor in the cost of transporting the sand over a 20 km unsuitable and badly maintained dirt road which is not fit for such purpose.</p> <p>15. The economic impact of the further deterioration of the dirt road is never even referred to, but will definitely, on any logical economic basis not lead to the reduction of the cost of sand, but to the increase of such costs. Interestingly, no mention is made of how many existing sand mines already exist in the area nor of their location.</p> <p>16. Very disconcertingly the Applicant does not refer to the relevant dirt road, puts no plan in place for the ongoing upgrading and maintenance thereof and the obvious impact thereon that the industrialised movement of trucks which are not of a rural agricultural type will have on the road is not dealt with at all. The</p>		<p>14 - 16. It is assumed that the road that is referred to is the Provincial District Gravel Road that provides access to the larger farming community. This road will be used by the general community in the area as well as a several large-scale farming activities, least of all the large citrus farm in the area. The upkeep of this road is the responsibility of the Regional District Roads Department in Humansdorp. The applicant has agreed that he will assist in the rehabilitation of the road where it can be proved that damage has been caused by the vehicles transporting sand from the Mining Permit area. As with all members of the community that the road services, the applicant will contribute income tax to the State coffers which should be used for the upkeep of the road. In addition, the relevance of the classification of the road is not as important as the entity that is responsible for the upkeep of the “sub-divisional road”, who is the Provincial Department of Roads and Transport with its district office in Humansdorp. If the quality of the road dangerous it is suggested that this is reported to the relevant district office. Finally, it is envisaged that 4 truckloads of</p>

<p>inescapable conclusion is that the other road users will have to bear the consequences of the Applicant's activities.</p>		<p>sand will be hauled along the road on a daily basis which is not considered a major increase of road use.</p>
<p><u>Random Comments</u></p> <p>17. Ad 4 - See the comments above</p> <p>18. Ad 6.4- No mention is made of the fact that the site is situated right on top of the Greater Baviaans Aquifer and the possible impact thereon.</p> <p>19. Ad 8.2.8 To describe the road as having been designed according to provincial road standards is to ignore the realities and the present state thereof. To state that the applicant will assist "where feasibly possible" to maintain and repair is equal to saying absolutely nothing will be done to attend to the inevitable deterioration which will be caused by the Applicant's trucking activities.</p> <p>20. Ad 8.2.10 As already stated there is no "local community" to benefit.</p> <p>21. Ad 8.2 11 The ambient noise level in the area is zero. You can literally hear a normal car driving kilometres away. The rattle and clang of industrial machinery and trucks will destroy the ambient noise level and peace and quiet in the area forever.</p> <p>22. The area is situated next to a nature reserve. No mention is made of this in the application. Environmental impact incidents will under the circumstance occur every day that the rattle and clang of the activities disturb the natural peace and quiet. The activities are not suitable for the area.</p> <p>23. The remaining report and annexures are not dealt with specifically as all the issues already dealt with are only repeated therein under different headings.</p>		<p>17. Comments addressed above.</p> <p>18. Based on the impacts assessed in Section 8 of the BAR, the impact on the groundwater is negligible.</p> <p>19. The condition of the road is the responsibility of the Provincial Department of Roads and Transport to maintain, however the applicant will assist where feasible and where proof can be provided that the damage to the road was caused by the trucks servicing the sand mine.</p> <p>20. It is envisaged that 3 employment opportunities will be generated for the mining operation, which would indeed benefit those employees and their families.</p> <p>21. Section 8 of the Draft BAR, as well as the EMPr (appendix E to the Draft BAR) details the noise mitigation measures to be implemented. Due to the scale of mining that is proposed, it is not anticipated to have a significant impact.</p> <p>22. According to the Register of Protected Areas available from the Department of Forestry, Fisheries and Environment (https://dffportal.environment.gov.za/portal/apps/webappviewer/index.html?id=7e27f116dd194c1f9d446dacc76fe483), the nearest Reserves are African Whisper Game Reserve (approximately 9.5km to the east of the proposed site), Honeyville Ecovillage and Nature Reserve (approximately 10.35km to the south east), Thaba Manzi Game Farm (approximately 13.5km to the southwest) and Jumanji Game Farm (16.8km to the southwest).</p>

		23. Comment is noted.
<p><u>1 Identification</u></p> <p>This document contains comments on the Draft Basic Assessment Report (DBAR): Mining of Sand on Portion 8 of Farm Kruisfontein No 193, Humansdorp, Eastern Cape dd May 2022, GCS Project Number: 21-0703, DMRE Ref No: EC30/5/1/3/2/10704MP, and Appendices thereto.</p>	<p>Hester van Rooyen Letter dated 14 June 2022, attached to email from H Nel on 27 June 2022.</p>	No response required.
<p><u>2 Introduction</u></p> <p>I, Martha Hester van Rooyen, ID 570211 0015 084, am the owner of portion 2 of the farm Kruisfontein No 193, Humansdorp, Eastern Cape, which borders directly on portion 8. I grew up on another neighbouring farm, now owned and actively farmed by my brother Jan van Rooyen. I know the area well, including its climate, fauna, flora and general rural character.</p>		No response required.
<p><u>3 Flaws and Omissions in the DBAR</u></p> <p><u>3.1 Hydrology and Aquatic Features</u></p> <p>I refer to section 6.4 and various other sections in the document. The study failed to recognize that the mining area is, in normal rainfall years, actually a vlei and becomes impassable for vehicles and machinery. The two agricultural dams mentioned are indeed fed from the vlei and are essential water sources for livestock and wild animals. Mr David Phillips is well aware of this fact - my brother had to tow his vehicles from the mud as recently as 2015.</p> <p>It is general knowledge that the area has experienced a severe 7 year drought, but we all trust that these conditions will not prevail much longer and normal rainfall will return.</p> <p><u>3.2 Climate</u></p> <p>Section 6.2 states rainfall mostly in spring and autumn; Table 5.2 in the draft EMP refers to the area as summer rainfall and dry season in winter; Table 5.22 refers to November - January as the wet season. These are simply wrong - the area is predominantly a winter rainfall region, with summers getting dryer.</p> <p>According to the Department of Agricultural Technical Services, the average annual rainfall for the region is 585 mm, somewhat lower than the stated figures.</p>		<p>3.1. An aquatic study was undertaken (Appendix B). According to the NFEPA database, there are no wetland features within the boundaries of the permit area, or within 100m of the site boundary. A site visit undertaken by the specialist verified this finding.</p> <p>3.2 This will be addressed and rectified in the FBAR where necessary.</p> <p>3.3 The reports relate to the 5ha Mining Permit application area and the direct impacts on this area as well as the cumulative impacts on the larger environment. As the activities associated with the Mining Permit that may affect the fauna and flora is limited to the 5ha footprint, it is not necessary to consider the larger area in this regard.</p> <p>3.4 The maps that are provided in the documentation was done in accordance with the requirements of the National Environmental Management Act (Act No. 107 of 1998): Environmental Impact Assessment Regulations (2014), as amended. The 5ha area is located within the farm boundaries of an existing farm with the coordinates provided on the maps as well as in the text in the</p>

<p>The average midday temperature in February is much higher than the 25 °C stated, lately in the high thirties and even forties.</p> <p>The report also fails to mention that very strong winds blow from time to time, known to uplift soil even from cultivated fields.</p> <p><u>3.3 Too narrow spatial scale</u></p> <p>The report was written on the mining area in isolation, not taking the adverse effect on the surrounding area into account. The mining area is currently in a bad state due to years of black wattle invasion, neglect and bad farming practices. Of course there are hardly any indigenous fauna and flora in the demarcated area, but the same is not at all true for the surrounding areas, which are actively farmed.</p> <p>The report completely fails to convey the impact of the proposed mining activities on the neighbouring farms and even on the region - the agriculture, fauna, flora, biodiversity and living conditions on all neighbouring farms will be negatively impacted by the dust, air pollution, soil and groundwater pollution, noise and increased human presence caused by the proposed mining activities. In terms of dust, road deterioration and noise, all neighbouring farm owners and all farm owners adjacent to the complete section of dirt road used by the trucks, will be seriously disadvantaged.</p> <p><u>3.4 Failure to show farm boundaries</u></p> <p>No farm boundaries are shown on the maps and images provided, failing to convey to the public how close the proposed mining area is to neighbouring farms, and how many other farm owners will be adversely affected.</p> <p><u>3.5 Missing operational figures</u></p> <p>The extent of the proposed mining operation is not mentioned, for example:</p> <ul style="list-style-type: none"> • how many truck loads of sand per day? • how many workers on an average day? • will the workers stay on site? <p><u>3.6 Wrong assumptions about road conditions</u></p> <p>The report states that 'The road is designed according to the specifications of a provincial road'. While this may be true for the</p>		<p>documents provided for PPP. As such, the location and extent of the Mining Permit area could easily have been determined by any member of public that wished to find the site.</p> <p>3.5 This has been addressed in the FBAR, please refer to section 2.</p> <p>3.6 The road is designed according to the specifications of a provincial road. The applicant will assist where feasibly possible to repair and maintain the road. On site, the existing farm access road off the provincial road.</p> <p>3.7 The enforcement of the management and mitigation measures are the responsibility of the Compliance and Enforcement Section of the Department of Mineral Resources and Energy.</p> <p>3.8 It can be confirmed that the Applicant for the Mining Permit has no intention of making use of any unregistered foreign labour. Furthermore, a maximum of 3 workers will be required and will not stay on site.</p> <p>3.9 The requirement for a Financial Guarantee for Rehabilitation is issued as a condition of the Mining Permit. As such, the trust fund will need to be in place before the Mining Permit will be issued by the relevant authority. The compliance with the requirement of the decommissioning and rehabilitation is the responsibility of the relevant authority.</p>
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<p>design, it certainly is not true for the maintenance. The dirt provincial road, from the point where it turns off the tarred road to Hankey, is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective, handle additional traffic in the form of heavy trucks.</p> <p><u>3.7 Impractical Mitigation measures</u></p> <p>The various mitigation measures may be a good paper exercise, but is totally impractical in the area concerned. Besides, these are suggestions rather than enforceable measures. To mention a few: there is not sufficient water to control dust, neither at the excavation site, nor along the dirt road - this will simply not be done; portable toilets will not be cleaned regularly, if they will be erected at all, resulting in pollution of soil and underground water; noise reduction, a private security company, perimeter fencing, site supervision, covering of top soil, etc will simply be too cumbersome and costly and will not be adhered to, as is the case with other operational quarry sites in the region.</p> <p>A complaints register is useless, as complaints will not be taken seriously. This will leave the onus on neighbouring farmers to take legal action against the developers and operators, which they do not have the time and money for.</p> <p><u>3.8 Labour</u></p> <p>There is no guarantee that local labour will be used. It is known that Mr David Phillips has made use of unregistered alien labourers which has perpetrated a housebreaking incident on a neighbouring property in the past.</p> <p><u>3.9 Decommissioning</u></p> <p>Appendix F states that decommissioning of the mine and specifically removal of alien vegetation will have a positive outcome on the environment - you certainly do not need to excavate an open cast mine to rehabilitate the area!</p> <p>While Table 7-1 of the EMP indicates a preliminary closure cost, it is nowhere stated that funds for this purpose will be held in a trust account from the beginning of operations - there is thus no guarantee that any decommissioning actions will be performed.</p>		
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<p><u>4 Objection to the Proposed Mining Activities</u></p> <p>The basis of my objection to the proposed mining activities, in no particular order, is listed below.</p> <p><u>4.1 Natural vleiland</u></p> <p>The natural vleiland in the proposed mining area will be permanently damaged, causing erosion and affecting the natural hydrology and ecosystem in the region.</p> <p><u>4.2 Dust and sand</u></p> <p>The dust from excavation, stored stockpiles and transportation will be deposited on cultivated fields and veld of neighbouring farms, damaging or even destroying crops and natural vegetation and thus adversely affecting grazing livestock and wild animals. The same holds for sand and soil uplifted by strong winds. The proposed site is less than 100m away from cultivated fields on the farm of Jan van Rooyen. The dust may also affect the health of residents close to the access road.</p> <p><u>4.3 Air and soil pollution</u></p> <p>The trucks and machinery used in the operations will pollute the clear farm air with carbon dioxide and other substances, to be inhaled and smelled by humans and animals alike.</p> <p>Spillages from trucks and machinery and failure to use toilet facilities will pollute soil and ground water.</p> <p><u>4.4 Noise</u></p> <p>The noise from trucks, machinery and the operations in general as well as increased human activity will be a disturbance in the houses of farmers and farm workers, some of which are close to the mining site, and be detrimental to livestock and wild animals in the surrounding area.</p> <p>There are still a few Cape Grysbok (<i>Raphicerus melanotis</i>) in the area (almost extinct in the Eastern Cape), as well as grey duiker - both species breed throughout the year, and will probably relocate to quieter, but not necessarily safe, areas.</p> <p><u>4.5 Property values</u></p>		<p>4.1 An aquatic study was undertaken (Appendix B). According to the NFEPA database, there are no wetland features within the boundaries of the permit area, or within 100m of the site boundary. A site visit undertaken by the specialist verified this finding.</p> <p>4.2 Section 8 of the FBAR, as well as the EMPr (Appendix E to the FBAR), indicate appropriate mitigation measures to be followed, to minimize the impact of dust on surrounding areas.</p> <p>4.3 It is expected that 4 truck loads of sand will be removed from site each day.</p> <p>Appropriate mitigation measures have been included in Section 8 of the BAR and the EMPr to address these potential impacts.</p> <p>4.4 Management and mitigation measures to limit the impact of noise on the environment is provided in the EMPR. The presence of Cape Grysbok (<i>Raphicerus melantis</i>) is noted and it is likely that they will initially move away from the area, but will most certainly return again.</p> <p>4.5 In the absence of any substantiation of this statement, the comment is noted as no response in this regard can be generated without proof that the property values will be affected.</p> <p>4.6 In the absence of any substantiation of this statement, the comment is noted as no response in this regard can be generated without proof that the property values will be affected.</p> <p>4.7 Comment is noted. The EMPR places the responsibility on the vehicles servicing the mining activities to obey all traffic regulations such as speed limits and adherence to road signs.</p> <p>4.8 The mining operations are limited to a 5ha area in a very large landscape. The compliance with the management and mitigation</p>
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<p>Property values of neighbouring farms will drop as a result of the industrialization and disturbance to the rural environment. The living quality of neighbours will be adversely affected.</p> <p><u>4.6 Poaching and crime</u></p> <p>It is expected that poaching and crime will increase in the area due to increased presence of non-local people.</p> <p><u>4.7 The access road</u></p> <p>The increased traffic will render the already bad provincial road impassable. Slow moving wide vehicles will cause traffic disruption and unsafe road conditions.</p> <p><u>4.8 Overall Effect on the Environment</u></p> <p>The adverse effect on the environment and local farm owners and residents is expected to be much worse than that stated in the report, mainly for two reasons: the spatial scale used in the analysis should have a higher weight, 2 or even 3 in most cases; and there is no guarantee that the recommended mitigation measures will be implemented.</p>		<p>measures included in the EMPR is the responsibility of the relevant authority. If any such non-compliances are observed, it can be reported to the Compliance and Monitoring Section of the Department of Mineral Resources and Energy.</p>
<p><u>5 Conclusion</u></p> <p>As a party to be directly affected by the proposed mining activities, I strongly object to the proposed sand mine. I reserve my rights to amplify my objection if and when additional information becomes available.</p>		<p>Your stance has been noted.</p>
<p>Hiermee wil ek my besware teen die beplande Sandmyn langs my eiendom se grens deur Kouga Sand indien.</p> <ol style="list-style-type: none"> 1. Die betrokke area is direk langs my eiendom se grens geleë alhoewel daar geen duidelike grens heinings op die betrokke kaart gesien kan word nie. Ek boer intensief op aangeplante weiding met hoë gehalte wol aangrensend tot die gebied. Die stof en geraas wat uit so 'n myn bedrywigheid voortspruit kan tot groot verliese aan inkomste vir my lei. Dit is geleë in 'n gebied met baie wind wat stofbesoedeling etlike honderde meters meebring. 2. Aangesien die beoogde myn direk land my eiendom se grensheining is sal die 'n uiterse negatiewe impak op die waarde van my eiendom hê. 	<p>Jan van Rooyen Letter sent by email, attached to email from H Nel on 27 June 2022.</p>	<ol style="list-style-type: none"> 1. Section 8 of the FBAR, as well as the EMPr (Appendix E to the FBAR), indicate appropriate mitigation measures to be followed, to minimize the impact of dust and noise on surrounding areas. 2. No proof is provided as to how the location of the 5ha Mining Permit area will adversely impact the property value of the much larger neighbouring farm. In the absence of any substantiating proof it is very difficult to provide a response in this regard. However, it stands to reason that if sand deposits are also present on the neighbouring farm, the value of the land could likely be increased.

<ol style="list-style-type: none"> 3. Die geraas wat die myn bedrywighede meebring sal 'n negatiewe uitwerking op my skape hê wat aangrensend wei. 4. Die myn is in 'n vleiland gebied geleë. Die gebied is nou droog weens die afgelope dewe jaar se lae reënval. In normale jare is dit 'n vlei wat dien as 'n kosbare bron van water vir die veë suipings laer af. Die water beland uiteindelik in die Gamtoosriver wat onder hoë druk is. Die gemiddelde reen val in die gebied is 580mm en nie soos aangedui in die aansoek nie. 5. Die openbare toegangroete tot die gebied is nie geskik vir swaar voertuie nie en op plekke slegs 3.9 wyd. Die pad word swak onderhou en is die enigste roete tot my eiendom. 'n Gedeelte van die roete is sleg as 'n onder geskikte pad wat ek self moet onderhou. 6. Die stof wat die swaar voertuie teweeg bring het 'n baie negatiewe uitwerking op die fynbos veld vir etlike 100 meter langs die pad. 7. Die kwessie van werkskapping in die gebied is debateerbaar aangesien Mnr Phillips slegs van Zimbabiese burgers gebruik maak. 		<ol style="list-style-type: none"> 3. Many mining activities are present on the verges of agricultural land where livestock is farmed. In the absence of any supporting information as to how the mining activities are considered to impact on the livestock, it is difficult to provide a response in this regard. 4. An aquatic study was undertaken (Appendix B). According to the NFEPA database, there are no wetland features within the boundaries of the permit area, or within 100m of the site boundary. A site visit undertaken by the specialist verified this finding. 5. The comment is noted, but as mentioned before, the road is a Provincial Road with the upkeep and maintenance responsibility of the road being with the Provincial Department of Roads and Transport. 6. The area on each side of the road is disturbed. 7. It can be confirmed that the Applicant for the Mining Permit has no intention of making use of any unregistered foreign labour. Furthermore, a maximum of 3 workers will be required and will not stay on site.
<p>Below find my findings with regards to the draft report.</p> <p><u>Access Roads:</u></p> <p>The current state of the roads can barely handle the current daily traffic. The access roads haven't been graded by the Local Municipality for the last 2 years. The contractor will have to make means in his budget to maintain the current access road leading from the R330 to the site. With heavy loads on a constant basis the road will not be suitable for any traffic. The current farm road leading from the R330 is not suitable for double lane traffic and this will increase the risk of accidents, the current signage as per the regulation is not up to standard and will have to be dealt with accordingly by the contractor.</p> <p>Dust pollution will have a negative impact on the local farming community, animals, and vegetation while heavy load will be</p>	<p>Maryna Erasmus Letter sent by email on 1 July 2022.</p>	<p>The road is designed according to the specifications of a provincial road. Although roads are the responsibility of the Kouga Local Municipality to maintain, the applicant will assist where feasibly possible to repair and maintain the road.</p> <p>Section 8 of the FBAR, as well as the EMPr (Appendix E to the FBAR), indicate appropriate mitigation measures to be followed, to minimize the impact of dust and noise on surrounding areas.</p>

<p>transported. Being in a water scares area and not being allowed to take water from any natural water course, dust control will not be an option.</p>		
<p><u>Construction Activities:</u></p> <p>Below activities is duly noted in draft report as per reference number above:</p> <ul style="list-style-type: none"> • Materials to be sorted by screening or washing • No water to be used during mining process • Open cast mine • Stockpile of topsoil • Increase in heavy vehicles • Employment opportunities <p>When washing material water will be required, with increase in traffic dust control will have to be implemented on a daily basis to ensure all construction workers, local community and animals stay safe. Being it an open cast mine and topsoil being stockpiled, necessary precautions will have to be made to ensure no wind erosion or dust pollution take place. The increase in traffic close to the community is a huge problem this will increase the possibility of stock theft and or even worse murders. With no water to be used during the construction process I cannot see this being solved in any other way, the site will be located in a water scares area and also not allowed to take water from natural water course, this project cannot continue.</p> <p>New employment opportunities will be minimum due to most of the works will be subcontracted out. The local community will not benefit from any of this.</p> <p>The increase of noise will have a huge impact on the local community and animals, especially adjacent neighbours, this is a very quiet and peaceful area. In this area all residents strive to conserve the area.</p> <p>The draft is for the mining site area, however the mining will affect the surrounding area as well. With an increase in people and vehicles, the area will be littered. Animals will move out of the area due to the increase of movement. Littering will be a huge risk to wild animals as animals might ingest plastic, causing the animal so</p>		<p>Section 8 of the FBAR, as well as the EMPr (Appendix E to the FBAR), indicate appropriate mitigation measures to be followed, to minimize all impacts on surrounding areas. Refer to these sections for more detail on the measures to be implemented.</p> <p>The mining operations are limited to a 5ha area in a very large landscape. The compliance with the management and mitigation measures included in the EMPr is the responsibility of the relevant authority. If any such non-compliances are observed, it can be reported to the Compliance and Monitoring Section of the Department of Mineral Resources and Energy.</p> <p>It can be confirmed that the Applicant for the Mining Permit has no intention of making use of any unregistered foreign labour. Furthermore, a maximum of 3 workers will be required and will not stay on site.</p>

<p>suffocate. Tin can cut the legs and hooves of roaming animals. These cuts will be badly infected if not treated and there is no easy way to treat a wild animal. Glass laying around can start wildfires especially when the veld is dry. The vegetation in this area burns easily when dry.</p> <p>Wildfires is 'n high risk for animals and residents.</p> <p>With topsoil being blowen away by wind how will rehabilitation take place after construction? It is extremely important to have plants covering the topsoil, as the plant material prevent the wind to cause erosion. Erosion is already a huge problem in South Africa, and we need to prevent it in any way possible.</p> <p>This project will have a huge impact on the environment. The impact will not only be on the designated construction areas but will be all along the access roads.</p> <p>Method statements will not be adhered to and followed due to the lack of resources.</p>		
<p><u>Site Location:</u></p> <p>With the access roads already not being in a good state, this project will not be cost effective and profitable to continue with. The damage to the road will cause damage to the trucks. To maintain the trucks will be at a huge cost. The location of the mining area next to portion 8, farm Quarrie Kraal, number 149, Kouga Municipality will not be feasible as there is a lot of livestock, the dust and noise will have a huge impact in the productivity of these animals.</p> <p>The additional sand mine added will not be of a good choice, in fact, this will increase the local price of sand.</p> <p>There is so many negative impacts for both the environment, residents and Kouga Sand, that I feel it is not worth it to go ahead with the mining. I hereby object to the proposed open cast mine - Kouga Sand</p>		<p>The access road to the Mining Permit area is a Provincial Road, the maintenance of which is the responsibility of the Provincial Department of Roads and Transport. The applicant is well aware of the state of the road and is of the belief that material can be hauled from the site in a cost effective manner.</p> <p>Your stance is noted</p>

APPENDIX A: DATABASE

Sector	Name	Surname	Company	Tel	Mobile	E-mail
Provincial Authority	Hlomiphile	Dlamini	DMRE	+27414036631		Hloniphile.dlamini@dmre.gov.za
Provincial Authority	Zukile	Pityi	Land Claims Commissioner			ZPityi@ruraldevelopment.gov.za
Provincial Authority			Roads and Public works			info@ecdpw.gov.za
Provincial Authority	Thandolwethu	Manda	Roads and Public works			thandolwethu.manda@ecdpw.gov.za
Provincial Authority	Them bani	Nyokana	Rural Development and Land Reform			them bani.nyokana@drdar.gov.za Nomfundo.mxenge@drdar.gov.za
Provincial Authority	Dayalan	Govender	EDEAT			dayalan.govender@dedea.gov.za
Provincial Authority	Mandilake	Zenzile	DWS			ZenzileM@dwa.gov.za
Provincial Authority	Bolekwa	Kama	DWS			kamab@dws.gov.za
Provincial Authority	Lwazikazi	Dimbaza	DWS			DimbazaL@dwa.gov.za
Provincial Authority			ECPRA			info@ecphra.org.za
Municipality	Jacques	Alexander	Ward 4 councillor		+27622862604	jalexander@kouga.gov.za
Adjacent Landowner	Heinrich	Nel	Remainder of Portion 10 of the Farm 193 Kruisfontein			heinrichnel1954@gmail.com
Adjacent Landowner	Hester	van Rooyen	Portion 2 of the Farm 193 Kruisfontein			hester@geo.co.za
Adjacent Landowner	Jan	van Rooyen	Portion 8 of the Farm Quarrie Kraal Nr 149			jannemanwillem@gmail.com
Adjacent Landowner	Maryna	Erasmus			+27824549175	marynae6@gmail.com
Interested and Affected Parties	Ansa	de Jager	Farm Oukraal No 148		+27828527356	ansadejager69@gmail.com
Interested and Affected Parties	Willem	van Vuuren				krantzplaas@jgen.co.za
Interested and Affected Parties	Zak	Venter	Honeyville Eco Reserve		+27829240853	zak@basicsupply.co.za
Interested and Affected Parties	Kobus	Reichert	Gamakwa Khoisan Council	+27422960399	+27728006322	kobusreichert@yahoo.com
Interested and Affected Parties	Cynthia	August	Gamakwa Khoisan Council Chairperson/ Ward Councillor (Hankey)			cynaug@hotmail.com

APPENDIX B: ADVERTISEMENT

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NOTIFICATION OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION PROCESS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (2014), AS AMENDED FOR THE PROPOSED KOUGA SAND OPERATIONS ON A PORTION OF THE FARM KRUISFONTEIN NO. 193, NEAR HUMANSDORP

GCS Ref No: 21-0703 DMRE Ref No: EC30/5/1/3/2/10704MP

Background and Project Description

Kouga Sand proposes to open a building sand mine on a portion of the Farm Kruijsfontein No. 193, approximately 19km northwest of Humansdorp. The Mining Permit will be used for the mining of building sand from the application area. The mining will be conducted as an opencast operation with the sand removed at surface and put through a screen to remove all root material from the sand. The excavation will be conducted with an excavator with the saleable product being removed off site with tipper trucks. An access road to the application area already exists in the form of a farm road.

Activities for which Environmental Authorisation is being sought:

The Project triggers the following potential Listed Activities in terms of the NEMA EIA Regulations (2014, as amended):

- GN R327, 07 April 2017, Listing Notice 1 – Activities 21, 22(i) and 27.

As such, the Application for Environmental Authorisation will take the form of a Basic Assessment Process as specified in the NEMA: EIA Regulations.

Project Progress and Participation:

GCS Water and Environmental Consultants (Pty) Ltd (GCS), has been appointed to undertake the necessary environmental processes for the above-mentioned Project and this notification forms part of the public consultation process as required by the NEMA EIA Regulations (2014, as amended). An Application for Environmental Authorisation has been lodged with the Competent Authority and a Draft Basic Assessment Report has been compiled.

Opportunity to Participate:

GCS Water and Environmental Consultants (Pty) Ltd (GCS), has been appointed to undertake the Application for Environmental Authorisation for the project and this notification forms part of the public consultation process as required by the NEMA EIA Regulations (2014, as amended). Interested and affected parties are hereby invited to register as a stakeholder for this project.

How do I participate?:

As per the NEMA: EIA Regulations (2014), as amended, interested and affected parties can register for the process by sending their name, contact details (phone number, email address, fax, etc.) and a clear statement of interest in the application to the contact details below. Interested and affected parties are requested to use the project reference number 21-0703 in their request for registration.

Please submit all comments directly to GCS, by using the contact details below:

Janice Callaghan
Tel: 031 764 7130
E-mail: janicec@gcs-sa.biz
Mail: PO Box 819, Gillitts, 3603


X1X4A2W-KG17022

NETWERK 24

EXpress **FP** MEDIA
FOR ANY PERSONAL ASSISTANCE WITH YOUR KOUGA EXPRESS ADVERTISING.

General, Property, Notices, Vacancy and Classified Adverts

Please Contact
TAMMARINE SCHARNECK
T: 042 293 2973 F: 042 293 3957
Email: tammarine.scharneck@media24.com



KOUGA MUNICIPALITY (EC108)
NOTICE NUMBER: 31/2022
DRAFT ANNUAL REPORT

Notice is herewith given in terms of Section 127 of the Municipal Finance Management Act, 56 of 2003 that the Council of Kouga Local Municipality at its meeting held on 31 January 2022, adopted the 2020/21 Draft Annual Report.

The report will be available for public scrutiny and comments on the following platforms: • Kouga Municipal Offices and Libraries (Jeffreys Bay, Humansdorp, St Francis Bay, Hankey and Patensie) during normal office hours from Thursday 17 February 2022.

- **Municipal Website at www.kouga.gov.za**
- **Email at pms@kouga.gov.za**

Members of the public and interested parties are invited to submit written comments on the 2020/21 Draft Annual Report, comments to reach the Office of the Municipal Manager by no later than 12:00 pm on Friday 4 March 2022.

Written comments may also be submitted per e-mail to pms@kouga.gov.za on or before 12:00 pm on Friday 4 March 2022.

In terms of the provisions of Section 21 of the Municipal Systems Act, 32 of 2000, community members who are not able to read or write and have inputs and comments may request assistance at their respective Ward Councillor's office which will enable them to make such submissions.
All comments submitted must be clearly marked:

COMMENTS ON THE 2020/2021 DRAFT ANNUAL REPORT

C. DU PLESSIS
MUNICIPAL MANAGER
P. O. Box 21 | JEFFREYS BAY | 6330



KOUKAMMA MUNICIPALITY

NOTICE CALLING FOR INSPECTION OF 2021 GENERAL VALUATION ROLL AND LODGING OF OBJECTION

Notice is hereby given in terms of the provision of Section 49(1)(a)(i)(ii) read together with section 78(2) of the Municipal Property Rates Act No 6 of 2004 as amended that the General Valuation Roll of the Koukamma Municipality for the period 14th February 2022 To 31st March 2022 is open for public inspection and the forms for the lodging of objection are obtainable at the Municipal Offices in Kareedouw, Joubertina, Libraries and all the satellite offices during office hours or Municipal website at www.koukammamunicipality.gov.za

PLEASE NOTE THAT THE CLOSING DATE FOR THE LODGING OF OBJECTIONS IS THE 31ST MARCH 2022 AT 16H00.

In terms of Section 49(1)(a)(ii) read with Section 78(2) of the Act, an invitation is hereby extended to any owner of property or other persons who so desires to lodge an objection with the Municipal Manager in respect of any matter, including the category, reflected in or omitted from the valuation roll during the above mentioned period.

Attention is pertinently invited to the provision in Section 50(2) which stipulates that an objection must be in relation to a specific individual property and not against the valuation roll as such.

Attention is further invited to the provision Section 50(3) which provides that the Municipal Manager must assist an objector to lodge an objection if that objector is unable to read or write. Persons requiring assistance are invited to make use of this service by contacting the Revenue Accountant (Mr Thandile Fiki) at the Kareedouw Offices of the municipality at telephone number 042 2887 200/042 2887 256 during office hours.

Objections endorsed "Attention General Valuation Objections" can either be e-mailed to koukamma@koukamma.gov.za

Registered Mail to: Private Bag X011, Kareedouw, 6400 or Hand delivered to: Koukamma Municipality, 5 Keet Street, Kareedouw.

Mr M.P Kate
Municipal Manager
11 FEBRUARY 2022



KOUKAMA MUNISIPALITEIT

OPROEP TOT ONDERSOEK VAN DIE 2021 ALGEMENE WAARDASIEROL EN INDIENING VAN BESWARE

Kennis geskied hiermee ingevolge die bepalings van artikel 49(1)(a)(i)(ii) saamgelees met artikel 78(2) van die Wet op Nasionale Eiendomsbelasting, Nr. 6 van 2004, soos gewysig, dat die Koukamma Munisipaliteit se Algemene Waardasierol vir die tydperk 14 Februarie 2022 tot 31 Maart 2022 beskikbaar is vir openbare ondersoek en die vorms vir die indiening van besware is verkrygbaar gedurende kantoorure van die munisipale kantoor in Kareedouw, Joubertina, Biblioteke en al die satelietkantore of op die munisipale webwerf by www.koukammamunicipality.gov.za

NEEM ASB. KENNIS DIE SLUITINGS DATUM VIR DIE INDIENING VAN BESWARE IS 31 MAART 2022 OM 16:00.

Ingevolge artikel 49(1)(a)(ii) saamgelees met artikel 78(2) van die Wet, word 'n uitnodiging gerig aan enige eiendomeienaar of ander persoon wat graag 'n beswaar by die Munisipale Bestuurder wil indien ten opsigte van enige onderwerp, insluitend die kategorie vervat of weggelaat van die waardasierol gedurende die bogemelde tydperk.

Aandag word uitdruklik gerig op die bepaling in artikel 50(2) wat bepaal dat 'n beswaar verwant aan 'n spesifieke individuele eiendom moet wees en nie sodanig teen die waardasierol nie.

Aandag word verder gerig op die bepaling in artikel 50(3) wat bepaal dat die munisipale bestuurder moet bystaan as beswaarmaker om 'n beswaar in te dien as die beswaarmaker nie kan lees of skryf nie. Persone wat bystand nodig word genooi om gebruik te maak van hierdie diens deur die Inkomsterekenmeester (mnr. Thandile Fiki) gedurende kantoorure te kontak by die munisipaliteit se Kareedouw-kantoor by telefoonnommer 042 288 7200/042 288 7256.

Besware gemerk "Aandag Algemene Waardasiebesware" mag per e-pos gestuur word na koukamma@koukamma.gov.za of per geregistreerde pos na: Privaat Saak X011, Kareedouw 6400 of per hand afgelewer by: Koukamma Munisipaliteit, Keetstraat 5, Kareedouw.

Mnr. M. P. Kate
Munisipale Bestuurder
11 FEBRUARIE 2022

X1X4A2W-KG17022

SONDLO & KNOPP ADVERTISING

APPENDIX C: NOTIFICATION EMAIL

Janice Callaghan

From: Janice Callaghan
Sent: 31 May 2022 10:12 PM
Subject: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

Bcc: Hloniphile.dlamini@dmre.gov.za; ZPityi@ruraldevelopment.gov.za; info@ecdpw.gov.za; thembani.nyokana@drdar.gov.za; Nomfundo.mxenge@drdar.gov.za; dayalan.govender@dedea.gov.za; thandolwethu.manda@ecdpw.gov.za; kamab@dws.gov.za; ZenzileM@dwa.gov.za; DimbazaL@dwa.gov.za; info@ecphra.org.za; jalexander@kouga.gov.za; heinrichnel1954@gmail.com; Hester van Rooyen; Jan van Rooyen; Maryna Erasmus; ansadejager69@gmail.com; krantzplaas@igen.co.za; zak@basicsupply.co.za; kobus reichert; cynaug@hotmail.com

Dear Registered Interested and Affected Party

NOTIFICATION OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (2014) AS AMENDED AND A MINING PERMIT IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (ACT 28 OF 2002) FOR THE PROPOSED KOUGA SAND OPERATIONS ON PORTION 8 OF THE FARM KRUISFONTEIN NO. 193, NEAR HUMANSDORP, EASTERN CAPE.

Kouga Sand proposes to open a building sand mine on Portion 8 of the Farm Kruisfontein No. 193, approximately 19km northwest of Humansdorp. The Mining Permit will be used for the mining of building sand from the application area. The mining will be conducted as an opencast operation with the sand removed at surface and put through a screen to remove all root material from the sand. The excavation will be conducted with an excavator with the saleable product being removed off site with tipper trucks. An access road to the application area already exists in the form of a farm road off the provincial road.

The Project triggers the following potential Listed Activities in terms of the NEMA EIA Regulations (2014, as amended):

- GN R327, 07 April 2017, Listing Notice 1 – Activities 21, 22(i) and 27.

We would like to inform you of your opportunity to participate by providing comments and raising issues of concern regarding the proposed application. The report and supporting documents are available for review and comment for 30 days from the date of this email, i.e. **31 May 2022 to 1 July 2022**.

The report can also be downloaded from the GCS website: <https://gcs-sa.biz/wp-content/uploads/2022/05/21-0703-Kouga-Sand-DBAR-Draft-for-Public-Review-Upload.pdf>

A hard copy version of the report is available upon request.

You are invited to submit your comments in writing to GCS by means of the following, with your name and contact details **no later than close of business on 1 July 2022**:

Janice Callaghan
Tel: 031 764 7130
E-mail: janicec@gcs-sa.biz
Mail: PO Box 819, Gillitts, 3603

Please use the reference number 21-0703 in all correspondence.

Kind regards

Janice Callaghan

From: Microsoft Outlook
To: Hloniphile.dlamini@dmre.gov.za; ZPityi@ruraldevelopment.gov.za; info@ecdpcw.gov.za; thembani.nyokana@drdar.gov.za; Nomfundo.mxenge@drdar.gov.za; dayalan.govender@dedea.gov.za; thandolwethu.manda@ecdpcw.gov.za; kamab@dws.gov.za; ZenzileM@dwa.gov.za; DimbazaL@dwa.gov.za; info@ecphra.org.za; jalexander@kouga.gov.za; heinrichnel1954@gmail.com; Hester van Rooyen; Jan van Rooyen; Maryna Erasmus; ansadejager69@gmail.com; krantzplaas@igen.co.za; zak@basicsupply.co.za; kobus reichert; cynaug@hotmail.com
Sent: 31 May 2022 10:12 PM
Subject: Relayed: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Hloniphile.dlamini@dmre.gov.za (Hloniphile.Dlamini@dmre.gov.za)

ZPityi@ruraldevelopment.gov.za (ZPityi@ruraldevelopment.gov.za)

info@ecdpcw.gov.za (info@ecdpcw.gov.za)

thembani.nyokana@drdar.gov.za (thembani.nyokana@drdar.gov.za)

Nomfundo.mxenge@drdar.gov.za (Nomfundo.mxenge@drdar.gov.za)

dayalan.govender@dedea.gov.za (dayalan.govender@dedea.gov.za)

thandolwethu.manda@ecdpcw.gov.za (thandolwethu.manda@ecdpcw.gov.za)

kamab@dws.gov.za (kamab@dws.gov.za)

ZenzileM@dwa.gov.za (ZenzileM@dwa.gov.za)

DimbazaL@dwa.gov.za (DimbazaL@dwa.gov.za)

info@ecphra.org.za (info@ecphra.org.za)

jalexander@kouga.gov.za (jalexander@kouga.gov.za)

heinrichnel1954@gmail.com (heinrichnel1954@gmail.com)

Hester van Rooyen (hester@geo.co.za)

Jan van Rooyen (jannemanwillem@gmail.com)

Maryna Erasmus (marynae6@gmail.com)

ansadejager69@gmail.com (ansadejager69@gmail.com)

krantzplaas@igen.co.za (krantzplaas@igen.co.za)

zak@basicsupply.co.za (zak@basicsupply.co.za)

[kobus reichert \(kobusreichert@yahoo.com\)](mailto:kobusreichert@yahoo.com)

[cynaug@hotmail.com \(cynaug@hotmail.com\)](mailto:cynaug@hotmail.com)

Subject: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

APPENDIX D: SITE NOTICES



NOTIFICATION OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION PROCESS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (2014), AS AMENDED FOR THE PROPOSED KOUGA SAND OPERATIONS ON A PORTION OF THE FARM KRUISFONTEIN NO. 193, NEAR HUMANSDORP

GCS REF NO: 21-0703

DMRE Ref No: EC30/5/1/3/2/10704MP

Background and Project Description:

Kouga Sand proposes to open a building sand mine on a portion of the Farm Kruisfontein No. 193, approximately 19km northwest of Humansdorp. The Mining Permit will be used for the mining of building sand from the application area. The mining will be conducted as an opencast operation with the sand removed at surface and put through a screen to remove all root material from the sand. The excavation will be conducted with an excavator with the saleable product being removed off site with tipper trucks. An access road to the application area already exists in the form of a farm road.

Activities for which Environmental Authorisation is being sought:

The Project triggers the following potential Listed Activities in terms of the NEMA EIA Regulations (2014, as amended):

- GN R327, 07 April 2017, Listing Notice 1 – Activities 21, 22(i) and 27.

As such, the Application for Environmental Authorisation will take the form of a Basic Assessment Process as specified in the NEMA: EIA Regulations.

Opportunity to Participate:

GCS Water and Environmental Consultants (Pty) Ltd (GCS), has been appointed to undertake the Application for Environmental Authorisation for the project and this notification forms part of the public consultation process as required by the NEMA EIA Regulations (2014, as amended). Interested and affected parties are hereby invited to register as a stakeholder for this project.

How do I participate?:

As per the NEMA: EIA Regulations (2014), as amended, interested and affected parties can register for the process by sending their name, contact details (phone number, email address, fax, etc.) and a clear statement of interest in the application to the contact details below. Interested and affected parties are requested to use the project reference number 21-0703 in their request for registration.

Please submit all comments directly to GCS, by using the contact details below:

Janice Callaghan

Tel: 031 764 7130

E-mail: janicec@gcs-sa.biz

Mail: PO Box 819, Gillitts, 3603



Figure 1: Locality map of the proposed Kouga Sand Operations

GCS Site Notice Locations

Project: Kouga Sands Mining Permit Application

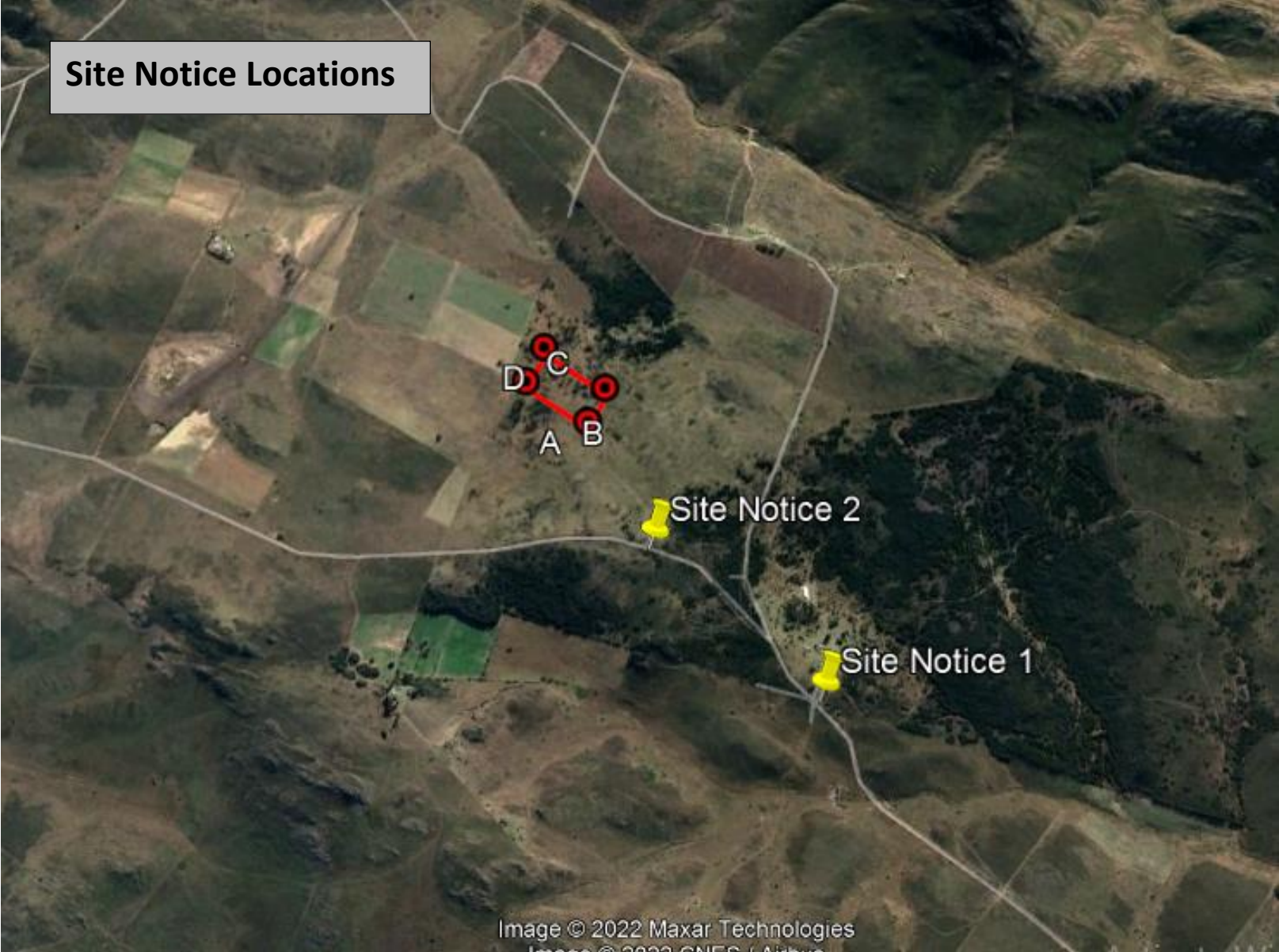
GCS Reference Number: 21-0703

DMRE Reference Number: EC30/5/1/3/2/10704MP

Date placed: 15 February 2022

Image	GPS Coordinates
 A photograph of a white site notice sign attached to a wooden fence post with green string. The sign features the GCS logo at the top left and contains text in Afrikaans and English. Below the text is a map showing a mining area with a blue river and surrounding terrain. The background shows a dry, grassy field under a blue sky with some clouds.	<p>33° 53'7.03"S 24° 41'8.99"E</p>
 A photograph of a white site notice sign attached to a tree trunk with green string. The sign is identical to the one in the first image, featuring the GCS logo, text in Afrikaans and English, and a map of the mining area. The background shows a wooded area with trees and a dry ground surface.	<p>33° 52'48.77"S 24° 40'44.39"E</p>

Site Notice Locations



APPENDIX E: SUBMISSIONS FROM STAKEHOLDERS DURING PROJECT INCEPTION

Janice Callaghan

From: Janice Callaghan
Sent: 01 March 2022 04:08 PM
To: Ansa De Jager
Cc: Magnus Van Rooyen
Subject: RE: Objection of mining rights
Attachments: Kouga Sand Map of the Application Area.pdf

Good afternoon,

Thank you for your email below.

We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.

Your email below will also be captured in the Comments and Responses Report that will be submitted with the Application.

Please find attached a map indicating the location of the Application Area.

Kind regards

From: Ansa De Jager <ansadejager69@gmail.com>
Sent: 28 February 2022 03:28 PM
To: Janice Callaghan <janicec@gcs-sa.biz>
Subject: Fwd: Objection of mining rights

Please find attached

----- Forwarded message -----

From: Jan van Rooyen <jannemanwillem@gmail.com>
Date: Mon, 28 Feb 2022, 14:48
Subject: Petisie nr 3
To: <ansadejager69@gmail.com>

Kleinfontein

HUMANSDORP

6300

23 Februarie 2022

GCS Water and Environment

Attention: Janice and Magnus

OBJECTION TO MINING RIGHTS APPLICATION

GSC Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good day,

I am the owner Portion of the Property known as Farm oukraal Kraal Nr 148 in the Kouga Munisipaliteit, District Humansdorp, Eastern Province.

I herewith wish to object to the application for mining rights next to my farm as per the reference above.

Kindly acknowledge receipt and confirm that my objection has been noted against the application.

Statement of interest and objection.

1. The notice referred to above does not identify the relevant property with any measure of clarity.
2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions.
The Google Maps Photo gives no coordinates.
3. I know the area and can see that it is close to my client's farm but cannot identify the property. I suspect that it is adjacent.
4. The description of the access road is incorrect as the area is served by a provincial dirt road and not a "farm road" as indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such.
5. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective handle additional traffic in the form of heavy trucks.
6. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road.
7. I reserve my client's rights to amplify its objections to the application upon receipt of the full application.

9. The area is a traditional rural farming community and the industrialisation thereof by mining activities will effect its character permanently.

Kind Regards

Janice Callaghan

From: Magnus Van Rooyen
Sent: 21 February 2022 10:04 AM
To: Willem van Vuuren; heinrichnel1954@gmail.com
Cc: Janice Callaghan; bikemarine@xsinet.co.za; nelmentz@gmail.com
Subject: RE: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good morning Mr van Vuuren,

You will be added to the Interested and Affected Party database and will be provided with all information that is generated by the application.

All the best,

From: Willem van Vuuren <krantzplaas@igen.co.za>
Sent: Monday, 21 February 2022 09:58
To: Magnus Van Rooyen <magnusvr@gcs-sa.biz>; heinrichnel1954@gmail.com
Cc: Janice Callaghan <janicec@gcs-sa.biz>; bikemarine@xsinet.co.za; nelmentz@gmail.com
Subject: Re: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good Morning

I represent Mooville Pty Ltd as Director. As affected party i would like to object to this matter aswell. I agree to all reasons mentioned by Mr.Nel as well as this area has been a farming community for many many years and industrialising this area does not sit well with current property owners.

Could you please register us as an affected and interested party.

Regards
Willem van Vuuren

From: [Magnus Van Rooyen](mailto:Magnus.Van.Rooyen@igen.co.za)
Sent: Thursday, February 17, 2022 11:34 AM
To: heinrichnel1954@gmail.com
Cc: [Janice Callaghan](mailto:Janice.Callaghan@igen.co.za) ; bikemarine@xsinet.co.za ; nelmentz@gmail.com ; krantzplaas@igen.co.za
Subject: RE: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good morning Mr Nel,

Your email below is acknowledged and recorded. You will be registered as an interested and affected party in this application process.

For clarity, please find the site plan for the application area attached.

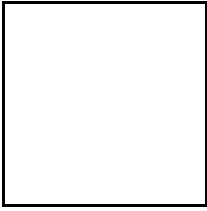
All further information regarding the application will be forwarded to you.

All the best,

Magnus Van Rooyen

Technical Director

Pr. Sci. Nat. (400335/11)



Tel +27 (0) 31 764 7130
Fax +27 (0) 31 764 7140
Cell 0842492365
Web www.gcs-sa.biz
Address 4a Old Main Road, Judges Walk,
Kloof, 3610, KwaZulu-Natal, South Africa

Established in 1987

[Water](#) | [Environmental](#) | [Geotechnical Engineering](#) | [Renewable Energy](#) | [GIS](#)

From: heinrichnel1954@gmail.com <heinrichnel1954@gmail.com>

Sent: 17 February 2022 11:04 AM

To: Janice Callaghan <janicec@gcs-sa.biz>

Cc: bikemarine@xsinet.co.za; Nel Mentz <nelmentz@gmail.com>; krantzplaas@igen.co.za

Subject: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good day,

I act on behalf of the owner of The Remainder of Portion 10 of the Farm 193 Kruisfontein being the Hein Nel Familie Trust.

Your undated above notice has today been brought to my attention by an adjacent interested party.

No other form of notification was received.

Kindly furnish me with a contact address at the DMRE in order that I can ensure that my objection to the application is noted.

Kindly also furnish me with the full application as the notice which you sent out is deficient and misleading as will be set out below.

Kindly acknowledge receipt and confirm that my objection has been noted against the application.

Statement of interest and objection.

1. The notice referred to above does not identify the relevant property with any measure of clarity.
2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions.
The Google Maps Photo gives no coordinates.
3. I know the area and can see that it is close to my client's farm but cannot identify the property. I suspect that it is adjacent.
4. If that is the case I wish to record that the adjacent owner has made use of unregistered alien labourers which has perpetrated a housebreaking incident on my client's property in the past. Any escalation in occupancy may exacerbate this threat.
5. The description of the access road is incorrect as the area is served by a provincial dirt road and not a "farm road" as indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such.
6. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective handle additional traffic in the form of heavy trucks.
7. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road.
8. I reserve my client's rights to amplify its objections to the application upon receipt of the full application.

Kindly acknowledge receipt hereof.

Groete/Regards

Hein Nel

Attorney : NelMentzSteynEllis Inc

Managing Trustee : Groenewald / Hein Nel Familie/ Ollie & Rhona Nel Familie Trusts
Curator and Member : NelMentz Likwidateurs CC
4 Siebert /14 Bureau Street
P O Box 440
Humansdorp 6300
heinrichnel1954@gmail.com
Cell 0828527356

Consider the environment before printing this email.

DISCLAIMER: The provisions of Section 11 of the Electronic Communications and Transactions Act 25 of 2002 apply to this email notice and make it enforceable and binding on the recipient/addressee. This email message (including attachments) contains information which may be confidential and/or legally privileged. Unless you are the intended recipient, you may not use, copy or disclose to anyone the message or any information contained in the message or from any attachments that were sent with this email, and If you have received this email message in error, please advise the sender by email, and delete the message. Unauthorised disclosure and/or use of information contained in this email may result in civil and criminal liability. Everything in this e-mail and attachments relating to the official business of GCS Water & Environment (Pty) Ltd (GCS) or any of its subsidiaries, is proprietary to the company. Caution should be observed in placing any reliance upon any information contained in this e-mail, which is not intended to be a representation or inducement to make any decision in relation to GCS after consultation with appropriate legal, regulatory, tax, technical, business, investment, financial, and accounting advisors. The e-mail address of the sender may not be used, copied, sold, disclosed or incorporated into any database or mailing list for spamming and/or other marketing purposes without the prior consent of GCS. Neither the sender of the e-mail, nor GCS shall be liable to any party for any direct, indirect or consequential damages, including, without limitation, loss of profit, interruption of business or loss of information, data or software or otherwise. No warranties are created or implied that an employee of GCS and/or a contractor of GCS is authorized to create and send this e-mail.

Janice Callaghan

From: Janice Callaghan
Sent: 23 February 2022 12:29 PM
To: 'Hester van Rooyen'; Magnus Van Rooyen
Cc: heinrichnel1954@gmail.com; bikemarine@xsinet.co.za; nelmentz@gmail.com; krantzplaas@igen.co.za; Jannie van Rooyen; ansadejager69@gmail.com
Subject: RE: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good day

Thank you for your comments.

You will be registered as an interested and affected party on this application and all documents that are prepared through the process will be made available to you.

Your submission will also be captured in the Comments and Responses Report that will be submitted with the Application.

Kind regards

-----Original Message-----

From: Hester van Rooyen <hester@geo.co.za>

Sent: 23 February 2022 12:14 PM

To: Janice Callaghan <janicec@gcs-sa.biz>; Magnus Van Rooyen <magnusvr@gcs-sa.biz>

Cc: heinrichnel1954@gmail.com; bikemarine@xsinet.co.za; nelmentz@gmail.com; krantzplaas@igen.co.za; Jannie van Rooyen <jannemanwillem@gmail.com>; ansadejager69@gmail.com

Subject: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good Morning

Kindly refer to attached document and reply as requested.

Kind regards

Hester van Rooyen

11 Nama Tahi
294 Fremontia Street
Lynnwood Ridge
Pretoria
0081
22 February 2022

GCS Water and Environment
E-mail: Janice Callaghan <janicec@gcs-sa.biz>
Attention: Magnus van Rooyen

OBJECTION TO MINING RIGHTS APPLICATION
GSC Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good day,

I am the owner of Portion 2 of the farm Kruisfontein number 193 in the Kouga Municipality, District Humansdorp, Eastern Cape Province.

I herewith wish to object to the application for mining rights as per the reference above.

Kindly acknowledge receipt and confirm that my objection has been noted against the application.

Statement of interest and objection:

- The notice referred to above does not identify the relevant property with any measure of clarity.
- The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions.
- The Google Maps Photo gives no coordinates.
- I know the area and can see that it is close to my farm but cannot identify the property. I suspect that it is adjacent.
- If that is the case I wish to record that the adjacent owner has made use of unregistered alien labourers which has perpetrated a housebreaking incident on a neighbouring property in the past. Any escalation in occupancy may exacerbate this threat.
- The description of the access road is incorrect as the area is served by a provincial dirt road and not a "farm road" as indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such.
- The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective, handle additional traffic in the form of heavy trucks.
- No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road.
- The area is a traditional rural farming community and the industrialisation thereof by mining activities will affect its character permanently.
- The area has indigenous fynbos and mining activities will damage the fragile ecosystem.
- I reserve my rights to amplify my objections to the application upon receipt of the full application.

Kind Regards



Martha Hester van Rooyen

Janice Callaghan

From: Janice Callaghan
Sent: 23 February 2022 01:30 PM
To: Jan van Rooyen; Magnus Van Rooyen
Subject: RE: Correction of objection letter

Dear Jan

Thank you, noted and recorded.

Kind regards

From: Jan van Rooyen <jannemanwillem@gmail.com>
Sent: 23 February 2022 01:24 PM
To: Magnus Van Rooyen <magnusvr@gcs-sa.biz>; Janice Callaghan <janicec@gcs-sa.biz>
Subject: Correction of objection letter

Goodday

This is a correction letter on 22 February 2022. Because I am the owner.
Sorry for the mistake.

Kind regards

Jan

**Mooiplaas
HUMANSDORP
6300
23 Februarie 2022**

**GCS Water and Environment
Attention: Janice and Magnus**

**OBJECTION TO MINING RIGHTS APPLICATION
GSC Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP**

Good day,

I am the owner of Portion 8 of the Farm Quarrie Kraal Nr 149 in the Kouga Munisipaliteit, District Humansdorp, Eastern Province.

I herewith wish to object to the application for mining rights next to my farm as per the reference above.

Kindly acknowledge receipt and confirm that my objection has been noted against the application.

Statement of interest and objection.

1. The notice referred to above does not identify the relevant property with any measure of clarity.
2. The description of the relevant property does not show which portion of the farm it relates to. The Farm 193 Kruisfontein referred to has been divided into many portions.
The Google Maps Photo gives no coordinates.
3. I know the area and can see that it is close to my client's farm but cannot identify the property. I suspect that it is adjacent.
4. The description of the access road is incorrect as the area is served by a provincial dirt road and not a "farm road" as indicated. The provincial dirt road to the area is about 17 kilometres long and is proclaimed as such.
5. The provincial road is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective handle additional traffic in the form of heavy trucks.
6. No indication is given as to the maintenance and repair obligations which will be required if heavy trucks use the road.
7. I reserve my client's rights to amplify its objections to the application upon receipt of the full application.
9. The area is a traditional rural farming community and the industrialisation thereof by mining activities will effect its character permanently.

Kind Regards

Jan Willem van Rooyen

Janice Callaghan

From: Janice Callaghan
Sent: 22 March 2022 10:55 AM
To: Maryna Erasmus
Cc: Magnus Van Rooyen
Subject: RE: OBJECTION TO MINING RIGHTS APPLICATION
Attachments: Kouga Sand Map of the Application Area.pdf

Good day,

Thank you for your email below.

We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.

Your email below will also be captured in the Comments and Responses Report that will be submitted with the Application.

Please find attached a map indicating the location of the Application Area.

Kind regards

From: Maryna Erasmus <marynae6@gmail.com>
Sent: 21 March 2022 09:46 PM
To: Janice Callaghan <janicec@gcs-sa.biz>
Subject: OBJECTION TO MINING RIGHTS APPLICATION

Good day Janice,

Please find attached my objection to mining rights as per notice GCS 21-0703.

Kind regards,
Maryna Erasmus
082 454 9175

GCS Water and Environment

Attention: Janice Callaghan

OBJECTION TO MINING RIGHTS APPLICATION

GCS REF. NO.: 21-0703

DMRE Ref No.: EC30/5/1/3/2/10704MP

Good day,

I here with wish to object to the application to mining rights on farm Kruisfontein number 193 as per the reference above.

Kindly acknowledge receipt and confirm that my objection has been noted against the application.

Statement of interest and objection:

1. There is not sufficient water on the applicant's farm nor to any adjacent properties to do any dust control to the mining area and the access road. The said area does have significant high wind speeds and the removal of any vegetation and increase of traffic will increase dust pollution to the area.
2. The access road will not be sufficient to handle heavy traffic. The existing access road is not wide enough to handle double lane traffic and this will increase the possibility for accidents on the road. The current road is also not maintained by the local municipality and the local residents can barely use the road in its current state.

As per the notice I don't see any maintenance plan to upgrade the access road.

3. As per the Google maps photo it does not show the exact area where the mining will take place. As per my understanding this will be adjacent to portion 8, farm Quarrie Kraal, Number 149, Kouga municipality. This area will not be sufficient as there is constant livestock next to this area. The existing boundary fence will not be sufficient as an increase in people can lead to theft in the community.

No specific coordinates have been given on the notice.

4. As it stands the area is very quiet and with the increase of heavy construction vehicles to this area, this will be a huge impact on noise pollution.

5. The local residents and myself preserve the nature and wildlife of this area, therefore I feel that the increase of people, construction vehicles, dust and noise will have a negative effect on the nature and wildlife wellbeing.

As per my reasons above, I object to any mining as per notice.

Kind regards,

Maryna Erasmus

082 454 9175

Janice Callaghan

From: Magnus Van Rooyen
Sent: 21 February 2022 05:59 PM
To: Zak Venter; Janice Callaghan
Subject: RE: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

Good afternoon Zak,

Thank you for your email below.

We will register you as an interested and affected party and ensure that all information that is generated through the Application is forwarded to you.

Your email below will also be captured on the Comments and Responses Report that will be submitted with the Application.

If you have any questions, please feel free to contact either myself or Janice.

All the best,

From: Zak Venter <zak@basicsupply.co.za>
Sent: Monday, 21 February 2022 17:40
To: Janice Callaghan <janicec@gcs-sa.biz>; Magnus Van Rooyen <magnusvr@gcs-sa.biz>
Subject: FW: GCS Ref No 21-0703 DMRE Ref No EC30/5/1/3/2/10704MP

To whom it may concern

As the developers of Honeyville Eco village and Nature Reserve We would like to formally and officially object to the proposed application / development on the above mentioned property.

We currently own the Honeyville Nature reserve and eco village development, and this will bring serious unwanted traffic and noise to the area, which directly affects and contradicts our conservation and rehabilitation values and partnerships with Eastern cape parks board, and other affiliates.

We have very rare and precious wildlife and doing a lot of work to conserve and keep this in tact which will be disturbed through these activities

We currently have home owners who bought into the peace and quiet that the nature reserve and eco village offers.

Additionally The road is currently in a terrible state and cannot handle any additional movement and heavy trucks, as well human activity in the area

Kindly acknowledge receipt and confirm that my objection has been noted against the application.

Much appreciated

Zak Venter
0829240853

Janice Callaghan

From: Janice Callaghan
Sent: 24 March 2022 06:27 PM
To: kobus reichert
Cc: cynaug@hotmail.com
Subject: RE: Mining Permit Applications - Humansdorp, Eastern Cape

Dear Kobus

Thank you for the details.

We have added you both to our database, and will forward you the reports for comment when available.

Kind regards

From: kobus reichert <kobusreichert@yahoo.com>
Sent: 24 March 2022 01:52 PM
To: Janice Callaghan <janicec@gcs-sa.biz>
Cc: cynaug@hotmail.com
Subject: Re: Mining Permit Applications - Humansdorp, Eastern Cape

Dear Janice,

Thank you for your enquiry.

You can use the details below to register us on your database and you can use my e-mail address to forward any notifications as well as Gavin's reports to enable us to submit comments with regard to these applications.

I have cc'd our chairperson: Ms. Cynthia August (who is also a ward councillor in Hankey) in this e-mail.

Best regards

Kobus Reichert
Gamtkwa Khoisan Council
Reg. no: 066-969 NPO
P.O Box 689
Jeffreys Bay
6330
Cell: 072 800 6322
Tel/Fax: 042 - 2960 399

On Thursday, March 24, 2022, 10:56:06 AM GMT+2, Janice Callaghan <janicec@gcs-sa.biz> wrote:

Dear Kobus

I trust this email finds you well.

We are busy with two projects in the Eastern Cape near Humansdorp, Gavin Anderson suggested I contact you. I would like to enquire if you are still the contact for the local Khoisan community in the area, to include in the I&AP database?

Kind regards

Janice Callaghan
Junior Environmental Consultant



Tel +27 (0) 31 764 7130
Fax +27 (0) 31 764 7140
Cell
Web www.gcs-sa.biz
Address 4a Old Main Road, Judges Walk,
Kloof, 3610, KwaZulu-Natal, South Africa

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Consider the environment before printing this email.

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APPENDIX F: SUBMISSIONS FROM STAKEHOLDERS ON THE DBAR

Re: Kouga Sand

H Nel

GCS Project Nr: 21-0703

Boomkloof

DMRE No EC 30/5/1/3/2/10704MP

27 June 2022

General Objections to the proposed development: H Nel

1. Kindly refer to the objections of Jan and Hester Van Rooyen attached hereto. In addition I wish to raise the following general objections.
2. I wish to emphasise that I am a direct neighbour to the relevant property. I know the area intimately and have been living on the adjacent property since 2007.
3. At that time the only activity which took place on the proposed mining property was livestock farming by the previous owner.
4. The present owner subsequently purchased the farm some 10 years ago and started off with milk goat farming and cheese production. When this ended some years ago, he started to make a living from charcoal production by removing and processing the alien wattle vegetation which had been allowed to spread over a large area due to bad soil control.
5. There is no local labour, and in the process, labour had to be imported. This has caused two break ins into my house. There is no access to shops and no existing proper housing for any labourers.
6. The geographical area is of a quiet rural farming nature and its greatest attribute is the peace and ambient quiet. The road access is served by a sub-divisional dirt road of some 20 km which is not maintained and in a shocking state of repair. I drive an Amarok double cab and have last week at 68,000 km on the clock replaced my tyres for the third time. This gives an indication of the condition of the road.

Need and Desirability

7. The whole Kouga area is replete with sand and suitable for sand mining. Sand can literally be obtained on industrial scale everywhere. On my farm for instance, large sand deposits are present. Not everybody however chooses to establish sand mines in a traditional rural livestock grazing area as is the case with this applicant. There are numerous better and more suitable areas where to establish sand mining activities where there is proper access with proper roads as is not the case with the proposed mining area.
8. It is very noteworthy that the applicant in the EMP does not accentuate the deficient access road and does not attempt to address the fact that even with its present use the area is served with a very badly maintained road which is suitable only for traditional farming activity usage and not industrial mining activities.
9. The impact on the road by heavy duty trucks and added road activities is nowhere addressed. The added activities under present conditions will likely make the road unusable to other properties and totally inaccessible to other landowners.
10. At present about 20 owners make use of the road and as it is the road is a hazard. No provision is made for ongoing repair and maintenance of the road by the miners. To argue that most of the road is a Provincial Road, which it is not as it is a sub-divisional road, is to shirk the obvious obligation to attend to the maintenance and upkeep of the road if you know full well that you will use heavy trucks and that you will damage the road for other road users. To fail to deal with maintenance and upkeep of the road in the report is to ignore the factual situation that the road is not maintained by the authorities.

Construction Phase

11. Very few people live in the geographical area and there are no human settlements close by. The area is of a rural nature, fit only for traditional farming activities. To refer to “Job Creation” as being a reason for establishing an industrial mining activity in the area is a ruse and pandering to sentiment which is out of place.
12. Any job creation would involve relocation of external labour to the area with the associated social problems accompanying such activity. In the past the owner has made use of unregistered foreign labour which speaks for itself.
13. There are no local people for whom employment is to be created and the applicant is challenged to provide a list of any local inhabitants who would be employed.

Operational Phase

14. What has been stated above is also relevant hereto. The statement that the development would be to the “Benefit of the local Municipality by reducing the cost of sand” however deserves some comment. The cost of sand from the proposed area would have to factor in the cost of transporting the sand over a 20 km unsuitable and badly maintained dirt road which is not fit for such purpose.
15. The economic impact of the further deterioration of the dirt road is never even referred to, but will definitely, on any logical economic basis not lead to the reduction of the cost of sand, but to the increase of such costs. Interestingly, no mention is made of how many existing sand mines already exist in the area nor of their location.
16. Very disconcertingly the Applicant does not refer to the relevant dirt road, puts no plan in place for the ongoing upgrading and maintenance thereof and the obvious impact thereon that the industrialised movement of trucks which are not of a rural agricultural type will have on the road is not dealt with at all. The inescapable conclusion is that the other road users will have to bear the consequences of the Applicant’s activities.

Random Comments

17. Ad 4 – See the comments above
18. Ad 6.4- No mention is made of the fact that the site is situated right on top of the Greater Baviaans Aquifer and the possible impact thereon.
19. Ad 8.2.8 To describe the road as having been designed according to provincial road standards is to ignore the realities and the present state thereof. To state that the applicant will assist “where feasibly possible” to maintain and repair is equal to saying absolutely nothing will be done to attend to the inevitable deterioration which will be caused by the Applicant’s trucking activities.
20. Ad 8.2.10 As already stated there is no “local community” to benefit.
21. Ad 8.2.11 The ambient noise level in the area is zero. You can literally hear a normal car driving kilometres away. The rattle and clang of industrial machinery and trucks will destroy the ambient noise level and peace and quiet in the area forever.
22. The area is situated next to a nature reserve. No mention is made of this in the application. Environmental impact incidents will under the circumstance occur every day that the rattle and clang of the activities disturb the natural peace and quiet. The activities are not suitable for the area.
23. The remaining report and annexures are not dealt with specifically as all the issues already dealt with are only repeated therein under different headings.

GCS Water and Environmental Consultants
E-mail: Janice Callaghan <janicec@gcs-sa.biz>
Attention: Magnus van Rooyen

1 Identification

This document contains comments on the Draft Basic Assessment Report (DBAR): Mining of Sand on Portion 8 of Farm Kruisfontein No 193, Humansdorp, Eastern Cape dd May 2022, GCS Project Number: 21-0703, DMRE Ref No: EC30/5/1/3/2/10704MP, and Appendices thereto.

2 Introduction

I, Martha Hester van Rooyen, ID 570211 0015 084, am the owner of portion 2 of the farm Kruisfontein No 193, Humansdorp, Eastern Cape, which borders directly on portion 8.

I grew up on another neighbouring farm, now owned and actively farmed by my brother Jan van Rooyen. I know the area well, including its climate, fauna, flora and general rural character.

3 Flaws and Omissions in the DBAR

3.1 Hydrology and Aquatic Features

I refer to section 6.4 and various other sections in the document. The study failed to recognize that the mining area is, in normal rainfall years, actually a vlei and becomes impassable for vehicles and machinery. The two agricultural dams mentioned are indeed fed from the vlei and are essential water sources for livestock and wild animals. Mr David Phillips is well aware of this fact - my brother had to tow his vehicles from the mud as recently as 2015.

It is general knowledge that the area has experienced a severe 7 year drought, but we all trust that these conditions will not prevail much longer and normal rainfall will return.

3.2 Climate

Section 6.2 states rainfall mostly in spring and autumn; Table 5.2 in the draft EMP refers to the area as summer rainfall and dry season in winter; Table 5.22 refers to November - January as the wet season. These are simply wrong - the area is predominantly a winter rainfall region, with summers getting dryer.

According to the Department of Agricultural Technical Services, the average annual rainfall for the region is 585 mm, somewhat lower than the stated figures.

The average midday temperature in February is much higher than the 25 °C stated, lately in the high thirties and even forties.

The report also fails to mention that very strong winds blow from time to time, known to uplift soil even from cultivated fields.

3.3 Too narrow spatial scale

The report was written on the mining area in isolation, not taking the adverse effect on the surrounding area into account. The mining area is currently in a bad state due to years of black wattle invasion, neglect and bad farming practices. Of course there are hardly any indigenous fauna and flora in the demarcated area, but the same is not at all true for the surrounding areas, which are actively farmed.

The report completely fails to convey the impact of the proposed mining activities on the neighbouring farms and even on the region - the agriculture, fauna, flora, biodiversity and living conditions on all neighbouring farms will be negatively impacted by the dust, air pollution, soil and groundwater pollution, noise and increased human presence caused by the proposed mining activities. In terms of dust, road deterioration and noise, all neighbouring farm owners and all farm owners adjacent to the complete section of dirt road used by the trucks, will be seriously disadvantaged.

3.4 Failure to show farm boundaries

No farm boundaries are shown on the maps and images provided, failing to convey to the public how close the proposed mining area is to neighbouring farms, and how many other farm owners will be adversely affected.

3.5 Missing operational figures

The extent of the proposed mining operation is not mentioned, for example:

- how many truck loads of sand per day?
- how many workers on an average day?
- will the workers stay on site?

3.6 Wrong assumptions about road conditions

The report states that 'The road is designed according to the specifications of a provincial road'. While this may be true for the design, it certainly is not true for the maintenance. The dirt provincial road, from the point where it turns off the tarred road to Hankey, is in a shocking state of disrepair and hardly gives access to the local farming community as it is. The road gives access to about 20 farm properties. It cannot possibly, even from a layman's perspective, handle additional traffic in the form of heavy trucks.

3.7 Impractical Mitigation measures

The various mitigation measures may be a good paper exercise, but is totally impractical in the area concerned.

Besides, these are suggestions rather than enforceable measures. To mention a few: there is not sufficient water to control dust, neither at the excavation site, nor along the dirt road - this will simply not be done; portable toilets will not be cleaned regularly, if they will be erected at all, resulting in pollution of soil and underground water; noise reduction, a private security company, perimeter fencing, site supervision, covering of top soil, etc will simply be too cumbersome and costly and will not be adhered to, as is the case with other operational quarry sites in the region.

A complaints register is useless, as complaints will not be taken seriously. This will leave the onus on neighbouring farmers to take legal action against the developers and operators, which they do not have the time and money for.

3.8 Labour

There is no guarantee that local labour will be used. It is known that Mr David Phillips has made use of unregistered alien labourers which has perpetrated a housebreaking incident on a neighbouring property in the past.

3.9 Decommissioning

Appendix F states that decommissioning of the mine and specifically removal of alien vegetation will have a positive outcome on the environment - you certainly do not need to excavate an open cast mine to rehabilitate the area!

While Table 7-1 of the EMP indicates a preliminary closure cost, it is nowhere stated that funds for this purpose will be held in a trust account from the beginning of operations - there is thus no guarantee that any decommissioning actions will be performed.

4 Objection to the Proposed Mining Activities

The basis of my objection to the proposed mining activities, in no particular order, is listed below.

4.1 Natural vleiland

The natural vleiland in the proposed mining area will be permanently damaged, causing erosion and affecting the natural hydrology and ecosystem in the region.

4.2 Dust and sand

The dust from excavation, stored stockpiles and transportation will be deposited on cultivated fields and veld of neighbouring farms, damaging or even destroying crops and natural vegetation and thus adversely affecting grazing live stock and wild animals. The same holds for sand and soil uplifted by strong winds. The proposed site is less than 100m away from cultivated fields on the farm of Jan van Rooyen. The dust may also affect the health of residents close to the access road.

4.3 Air and soil pollution

The trucks and machinery used in the operations will pollute the clear farm air with carbon dioxide and other

substances, to be inhaled and smelled by humans and animals alike.

Spillages from trucks and machinery and failure to use toilet facilities will pollute soil and ground water.

4.4 Noise

The noise from trucks, machinery and the operations in general as well as increased human activity will be a disturbance in the houses of farmers and farm workers, some of which are close to the mining site, and be detrimental to livestock and wild animals in the surrounding area.

There are still a few Cape Grysbok (*Raphicerus melanotis*) in the area (almost extinct in the Eastern Cape), as well as grey duiker - both species breed throughout the year, and will probably relocate to quieter, but not necessarily safe, areas.

4.5 Property values

Property values of neighbouring farms will drop as a result of the industrialization and disturbance to the rural environment. The living quality of neighbours will be adversely affected.

4.6 Poaching and crime

It is expected that poaching and crime will increase in the area due to increased presence of non-local people.

4.7 The access road

The increased traffic will render the already bad provincial road impassable. Slow moving wide vehicles will cause traffic disruption and unsafe road conditions.

4.8 Overall Effect on the Environment

The adverse effect on the environment and local farm owners and residents is expected to be much worse than that stated in the report, mainly for two reasons: the spatial scale used in the analysis should have a higher weight, 2 or even 3 in most cases; and there is no guarantee that the recommended mitigation measures will be implemented.

5 Conclusion

As a party to be directly affected by the proposed mining activities, I strongly object to the proposed sand mine.

I reserve my rights to amplify my objection if and when additional information becomes available.

Yours sincerely



Martha Hester van Rooyen

Posbus 536
HUMANSDORP
6300

PLAAS: Mooiplaas

14 Junie 2022

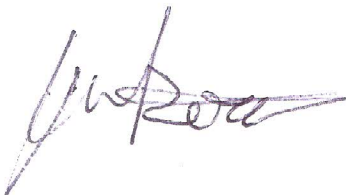
OBJECTION TO MINING RIGHTS - REF 21-0703

Goeie dag

Hiermee wil ek my besware teen die beplande Sandmyn langs my eiendom se grens deur KOUGA SAND indien.

1. Die betrokke area is direk langs my eiendom se grens gelee alhoewel daar geen duidelike grens heinings op die betrokke kaart gesien kan word nie. Ek boer intensief op aangeplante weiding met hoe gehalte wol aangrensend tot die gebied. Die stof en geraas wat uit so 'n myn bedrywigheid voortspruit kan tot groot verliese aan inkomste vir my lei. Dit is gelee in 'n gebied met baie wind wat stofbesoedeling etlike honderde meters meebring.
2. Aangesien die beoogde myn direk langs my eiendom se grensheining is sal dit 'n uiterse negatiewe impak op die waarde van my eiendom he.
3. Die geraas wat die myn bedrywigheede meebring sal 'n negatiewe uitwerking op my skape he wat aangrensend wei.
4. Die myn is in 'n vleiland gebied gelee. Die gebied is nou droog weens die afgelope sewe jaar se lae reeival. In normale jare is dit 'n vlei wat dien as 'n kosbare bron van water vir die vee suipings laer af. Die water beland uiteindelik in die Gamtoosrivier wat onder hoe druk is. Die gemiddelde ree val in die gebied is 580mm en nie soos aangedui in die aansoek nie.
5. Die openbare toegangsroete tot die gebied is nie geskik vir swaar voertuie nie en op plekke slegs 3.9 wyd. Die pad word swak onderhou en is die enigste roete tot my eiendom. 'N Gedeelte van die roete is sleg as 'n onder geskikte pad wat ek self moet onderhou.
6. Die stof wat die swaar voertuie teweeg bring het 'n baie negatiewe uitwerking op die fynbos veld vir etlike 100 meter langs die pad.
7. Die kwessie van werkskepping in die gebied is debateerbaar aangesien Mnr Phillips slegs van Zimbabiese burgers gebruik maak.

Die uwe



JW VAN ROOYEN

Janice Callaghan

From: Janice Callaghan
Sent: 01 July 2022 01:07 PM
To: Maryna Erasmus
Subject: RE: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

Dear Maryna

Thank you for your email.

We have received your comments and they will be included in the submission of the application.

Kind regards

From: Maryna Erasmus <marynae6@gmail.com>
Sent: 01 July 2022 12:34 PM
To: Janice Callaghan <janicec@gcs-sa.biz>
Subject: Re: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

Good day Janice,

I do apologise for my previous email as I have attached the wrong file.

Please find herewith attached my objection to the proposed mining.

Kind regards,
Maryna

On Fri, 1 Jul 2022 at 12:30, Maryna Erasmus <marynae6@gmail.com> wrote:

 [21-0703-Kouga-Sand-DBAR-Draft-for-Public-Review...](#)

Good day Janice,

Hope you are doing well.

Thank you for sending the link for the proposed application.

Please find attached my objection to mining.

Kind regards,
Maryna

On Tue, 31 May 2022 at 22:11, Janice Callaghan <janicec@gcs-sa.biz> wrote:

Dear Registered Interested and Affected Party

NOTIFICATION OF AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (ACT NO. 107 OF 1998): ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS (2014) AS AMENDED AND A MINING PERMIT IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (ACT 28 OF 2002) FOR THE PROPOSED KOUGA SAND OPERATIONS ON PORTION 8 OF THE FARM KRUISFONTEIN NO. 193, NEAR HUMANSDORP, EASTERN CAPE.

Kouga Sand proposes to open a building sand mine on Portion 8 of the Farm Kruisfontein No. 193, approximately 19km northwest of Humansdorp. The Mining Permit will be used for the mining of building sand from the application area. The mining will be conducted as an opencast operation with the sand removed at surface and put through a screen to remove all root material from the sand. The excavation will be conducted with an excavator with the saleable product being removed off site with tipper trucks. An access road to the application area already exists in the form of a farm road off the provincial road.

The Project triggers the following potential Listed Activities in terms of the NEMA EIA Regulations (2014, as amended):

- GN R327, 07 April 2017, Listing Notice 1 – Activities 21, 22(i) and 27.

We would like to inform you of your opportunity to participate by providing comments and raising issues of concern regarding the proposed application. The report and supporting documents are available for review and comment for 30 days from the date of this email, i.e. **31 May 2022 to 1 July 2022**.

The report can also be downloaded from the GCS website: <https://gcs-sa.biz/wp-content/uploads/2022/05/21-0703-Kouga-Sand-DBAR-Draft-for-Public-Review-Upload.pdf>

A hard copy version of the report is available upon request.

You are invited to submit your comments in writing to GCS by means of the following, with your name and contact details **no later than close of business on 1 July 2022**:

Janice Callaghan

Tel: 031 764 7130

E-mail: janicec@gcs-sa.biz

Mail: PO Box 819, Gillitts, 3603

Please use the reference number 21-0703 in all correspondence.

Kind regards

Janice Callaghan
Junior Environmental Consultant



Tel +27 (0) 31 764 7130
Fax +27 (0) 31 764 7140
Cell
Web www.gcs-sa.biz
Address 4a Old Main Road, Judges Walk,
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Janice Callaghan

From: Microsoft Outlook
To: Maryna Erasmus
Sent: 01 July 2022 01:07 PM
Subject: Relayed: RE: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

[Maryna Erasmus \(marynae6@gmail.com\)](mailto:marynae6@gmail.com)

Subject: RE: Notification of Public Review Period - Application for Environmental Authorisation and Mining Permit for Kouga Sand (EC30/5/1/3/2/10704MP)

GCS Water and Environment

Attention: Janice Callagan

OBJECTION TO MINING RIGHTS APPLICATION – BASIC ASSESMENT REPORT

GCS PROJECT NUMBER: 21-0703

DMRE REF: EC30/5/1/3/2/10704MP

Below find my findings with regards to the draft report:

Access Roads:

The current state of the roads can barely handle the current daily traffic. The access roads haven't been graded by the Local Municipality for the last 2 years. The contractor will have to make means in his budget to maintain the current access road leading from the R330 to the site. With heavy loads on a constant basis the road will not be suitable for any traffic. The current farm road leading from the R330 is not suitable for double lane traffic and this will increase the risk of accidents, the current signage as per the regulation is not up to standard and will have to be dealt with accordingly by the contractor.

Dust pollution will have a negative impact on the local farming community, animals, and vegetation while heavy load will be transported. Being in a water scares area and not being allowed to take water from any natural water course, dust control will not be an option.

Construction Activities:

Below activities is duly noted in draft report as per reference number above:

- Materials to be sorted by screening or washing
- No water to be used during mining process
- Open cast mine
- Stockpile of topsoil
- Increase in heavy vehicles
- Employment opportunities

When washing material water will be required, with increase in traffic dust control will have to be implemented on a daily basis to ensure all construction workers, local community and animals stay safe. Being it an open cast mine and topsoil being stockpiled, necessary precautions will have to be made to ensure no wind erosion or dust pollution take place. The increase in traffic close to the community is a huge problem this will increase the possibility of stock theft and or even worse murders. With no water to be used during the construction process I cannot see this being solved in any other way, the site will be located in a water scares area and also not allowed to take water from natural water course, this project cannot continue.

New employment opportunities will be minimum due to most of the works will be subcontracted out. The local community will not benefit from any of this.

The increase of noise will have a huge impact on the local community and animals, especially adjacent neighbours, this is a very quiet and peaceful area. In this area all residents strive to conserve the area.

The draft is for the mining site area, however the mining will affect the surrounding area as well. With an increase in people and vehicles, the area will be littered. Animals will move out of the area due to the increase of movement. Littering will be a huge risk to wild animals as animals might ingest plastic, causing the animal so suffocate. Tin can cut the legs and hooves of roaming animals. These cuts will be badly infected if not treated and there is no easy way to treat a wild animal. Glass laying around can start wildfires especially when the veld is dry. The vegetation in this area burns easily when dry

Wildfires is 'n high risk for animals and residents.

With topsoil being blown away by wind how will rehabilitation take place after construction? It is extremely important to have plants covering the topsoil, as the plant material prevent the wind to cause erosion. Erosion is already a huge problem in South Africa, and we need to prevent it in any way possible.

This project will have a huge impact on the environment. The impact will not only be on the designated construction areas but will be all along the access roads.

Method statements will not be adhered to and followed due to the lack of resources.

Site Location:

With the access roads already not being in a good state, this project will not be cost effective and profitable to continue with. The damage to the road will cause damage to the trucks. To maintain the trucks will be at a huge cost. The location of the mining area next to portion 8, farm Quarrie Kraal, number 149, Kouga Municipality will not be feasible as there is a lot of livestock, the dust and noise will have a huge impact in the productivity of these animals.

The additional sand mine added will not be of a good choice, in fact, this will increase the local price of sand.

There is so many negative impacts for both the environment, residents and Kouga Sand, that I feel it is not worth it to go ahead with the mining.

I hereby object to the proposed open cast mine – Kouga Sand

Maryna Erasmus