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info@vahlengweadvisory.co.za

17 April 2026

The Regional Manager

DMPR: KwaZulu Natal Region

333 Anton Lembede Street 3rd Floor

Durban Bay House

Durban

4001

Attention: Karoon Moodley

cc: Hlengiwe Mthembu

Dear Sir

SUBMISSION: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT (EMPr) FOR MINING RIGHT TO MINE FOR COAL ON REMAINING EXTENT OF KLIPBERG 2158 GS, RAMAK 13696 GS, BRAKFONTEIN 1316 GS, GANNA HOEK 1317 GS, THE SHAWS 11317 GS, SCHURFDE POORT 1147 GS, SITUATED IN THE MAGISTERIAL DISTRICT OF ESTCOURT, KWA-ZULU NATAL PROVINCE: DUNROSE INVESTMENTS 174 (PTY) LTD.

DMPR Ref No: KZN30/5/1/2/2/10137 MR

The above-mentioned matter bears reference:

We hereby submit the environmental documents required for the above-mentioned application. We are submitting the following:

1. Environmental Impact Assessment Report and Environmental Management Programme.
2. Supporting documents attached as appendices
3. Specialist studies

I hope you find this in order.

Yours faithfully,

Sunday Mabaso

Vahlengwe Mining Advisory and Consulting

DUNROSE INVESTMENT 174 (PTY) LTD

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

AND

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

KZN30/5/1/2/2/10137 MR

ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT FOR THE PROPOSED MINING RIGHT APPLICATION FOR COAL IN RESPECT OF REMAINING EXTENT OF PORTION 1 AND REMAINING EXTENT OF THE FARM SCHURFDE POORT 1147 GS; THE FARM SHAWS NO.11317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM GANNA HOEK 1317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM KLIP BERG 2158 GT; THE FARM BRAKFONTEIN 1316 GS; PORTIONS 1, 2 AND THE REMAINING EXTENT OF THE FARM RAMAK 13696 GT WITHIN THE ADMINISTRATIVE DISTRICT OF UTHUKELA/ ESTCOURT, KWA-ZULU NATAL PROVINCE.

NAME OF APPLICANT: DUNROSE INVESTMENTS 174 (PTY) LTD

CELL NO: +27 82 324 7345

POSTAL ADDRESS: P.O. Box 1364; Rayton; 1001

PHYSICAL ADDRESS: Plot 32, Rhenosterfontein. Rayton, 1001

April 2026

This document has been prepared by:

Vahlengwe Mining Advisory and Consulting

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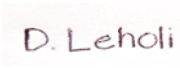
Prepared by:

Name	Responsibility	Signature	Date
Dimakatso Leholi	Report Compiler		April 2026
Mulalo Mafunisa	Stakeholder Engagement		April 2026
Lusizo Nqasha	GIS Mapping		April 2026
Sunday Mabaso	Project Leader/Manager		April 2026

1. IMPORTANT NOTICE

In terms of the Mineral and Petroleum Resources Development Act (Act 28 of 2002 as amended), the Minister must grant a prospecting or mining right if among others the mining "will not result in unacceptable pollution, ecological degradation or damage to the environment".

Unless an Environmental Authorisation can be granted following the evaluation of an Environmental Impact Assessment and an Environmental Management Programme report in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), it cannot be concluded that the said activities will not result in unacceptable pollution, ecological degradation or damage to the environment.

In terms of section 16(3)(b) of the EIA Regulations, 2014, any report submitted as part of an application must be prepared in a format that may be determined by the Competent Authority and in terms of section 17 (1) (c) the competent Authority must check whether the application has taken into account any minimum requirements applicable or instructions or guidance provided by the competent authority to the submission of applications.

It is therefore an instruction that the prescribed reports required in respect of applications for an environmental authorisation for listed activities triggered by an application for a right or permit are submitted in the exact format of, and provide all the information required in terms of, this template. Furthermore, please be advised that failure to submit the information required in the format provided in this template will be regarded as a failure to meet the requirements of the Regulation and will lead to the Environmental Authorisation being refused.

It is furthermore an instruction that the Environmental Assessment Practitioner must process and interpret his/her research and analysis and use the findings thereof to compile the information required herein. (Unprocessed supporting information may be attached as appendices). The EAP must ensure that the information required is placed correctly in the relevant sections of the Report, in the order, and under the provided headings as set out below, and ensure that the report is not cluttered with un-interpreted information and that it unambiguously represents the interpretation of the applicant.

2. OBJECTIVE OF THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

(a) determine the policy and legislative context within which the activity is located and document how the proposed activity complies with and responds to the policy and legislative context;

(b) describe the need and desirability of the proposed activity, including the need and desirability of the activity in the context of the preferred location;

(c) identify the location of the development footprint within the preferred site based on an impact and risk assessment process inclusive of cumulative impacts and a ranking process of all the identified development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects of the environment;

(d) determine the—-

(i) nature, significance, consequence, extent, duration and probability of the impacts occurring to inform identified preferred alternatives; and

(ii) degree to which these impacts—

(aa) can be reversed;

(bb) may cause irreplaceable loss of resources, and

(cc) can be avoided, managed or mitigated;

(e) identify the most ideal location for the activity within the preferred site based on the lowest level of environmental sensitivity identified during the assessment;

(f) identify, assess, and rank the impacts the activity will impose on the preferred location through the life of the activity;

(g) identify suitable measures to manage, avoid or mitigate identified impacts; and

(h) identify residual risks that need to be managed and monitored.

LIST OF ACRONYMS AND ABBREVIATIONS

AIPs	Alien Invasive Plants
BID	Background Information Document
CRR	Comments and Response Report
DFFE	Department of Forestry Fisheries and the Environment
DMRE	Department of Mineral Resources and Energy
DWA	Department of Water Affairs
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
GNR	Government Notice Regulations
Ha	Hectares
HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties
LoM	Life of Mine
WULA	Water Use License Application
MPRDA	Mineral and Petroleum Resources Development Act (Act No 28 of 2002)
MR	Mining Right
NAAQS	National Ambient Air Quality Standards
NCR	Noise Control Regulations Act, 1989 (Act 73 of 1989)
NEMAQA	National Environmental Management Air Quality Act, 2004 (Act No. 39 of 2004)

NEMBA	National Environmental Management Biodiversity Act, 2004 (Act No.10 of 2004)
NEMWA	National Environmental Water Act, 2008 (Act No. 59 of 2008)
NEMA	National Environmental Management Act 1998, (Act No. 107 of 1998)
NHRA	National Heritage Resources Act,1999 (Act No. 25 of 1999)
NWA	National Water Act, 1998 (Act No.36 of 1998)
PIA	Paleontological Impact Assessment
PM 10	Particulate Matter 10
SAHRA	South African Heritage Resources Agency
SANBI	South African National Biodiversity Institute
SANS	South African National Standards
SIA	Social Impact Assessment
WMA	Water Management Area
WML	Waste Management Licence

SUMMARY

Vahlengwe Mining Advisory and Consulting (VMAC) has been appointed by Dunrose Investments 174 (Pty) Ltd as an independent Environmental Assessment Practitioner (EAP) to facilitate and conduct Environmental Authorisation (EA) for the mining right application for the Colenso Coal project. Dunrose is applying for a mining right (MR) in respect of the remaining extent of portion 1 and remaining extent of the farm Schurfde Poort 1147 GS; the farm Shaws No.11317 GS; portion 1 and the remaining extent of the farm Ganna Hoek 1317 GS; portion 1 and the remaining extent of the farm Klip Berg 2158 GT; the farm Brakfontein 1316 GS; portions 1, 2 and the remaining extent of the farm Ramak 13696 GT, situated in the Magisterial District of uThukela/Estcourt KwaZulu Natal Province, covering an extent of 6 333, 2240 ha. The method to be employed is the highwall mining method. Dunrose holds a prospecting right on the above-mentioned farms and portions referenced (KZN30/5/1/1/2/10662 PR) renewed under (KZN30//5/1/1/2/11124 PR) for a period of three years commencing 10 November 2024 ending on 09 November 2025.

APPLICANT:

Contact Details for the applicant:

Name of Applicant:	Dunrose Investment 174 (Pty) Ltd		
Registration number (if any):	2002/031595/07		
Trading name (if any):	Dunrose Investment 174 (Pty) Ltd		
Contact person:	Mrs. Debbie James		
Physical address:	Plot 32 Rhenosterfontein Rayton 1001		
Postal address:	P.O. Box 1364 Rayton 1001		
Postal code:	1001	Cellphone:	+27 82 324 7345
Email:	debbiej@inala-energy.com		

Environmental Assessment Practitioner

Name of the Practitioner:	Sunday Mabaso
Company name:	Vahlengwe Mining Advisory and Consulting
Designation:	Principal Consultant & Registered Environmental Assessment Practitioner (EAP)
Tel No:	+27 11 432 0062
Cell No:	+27 74 569 7312
Email Adress:	info@vahlengweadvisory.co.za sunday@vahlengweadvisory.co.za
Name of Practitioner:	Dimakatso Leholi
Company name:	Vahlengwe Mining Advisory and Consulting
Designation:	Environmental Assessment Practitioner (EAP)
Tel No:	+27 11 432 0062
Email:	dimakatso@vahlengweadvisory.co.za

APPROACH AND METHODOLOGY FOR THE PUBLIC PARTICIPATION PROCESS (PPP):

Public Participation is a process that allows individuals, organizations, Interested and Affected Parties (I&APs), communities potentially affected by a proposed development to voice their concerns and opinions. This process is crucial for ensuring transparency, accountability, and informed decision-making in environmental management. It must be undertaken in terms of Regulations 39 to 44 of the Environmental Impact Assessment (EIA) Regulations, GNR 982. The approach followed by Vahlengwe ensures a public participation process designated to provide sufficient and accessible information to Interested and Affected Parties (I&APS) in an objective manner and is comprehensively covered in the draft EIR & EMPr.

1. Public Participation Process Initiation (Scoping Phase)

Dunrose had a meeting with Chief Mthembu (Stakeholder) along with Vahlengwe Advisory to discuss the mining right application.

Documentation including basic information documents, site notices, newspaper adverts and draft Scoping Report.

Public participation process commenced on 17 January 2025 to 01 February 2025.

Public meeting was held on 17 January 2025 at KwaNqcongo (Headman) Ganna Hoek Village.

Virtual meeting was held on 24 January 2025 using MS Teams with another Interested and Affected Party.

2. Finalization of the Scoping Report and Submission (25 January 2025 – 31 January 2025)

Vahlengwe finalized the Scoping Report addressing comments from I&APs and stakeholders during the public participation process.

Final Scoping Report was issued to the public and submitted to the Department of Mineral and Petroleum Resources (DMPR) on 31 January 2024.

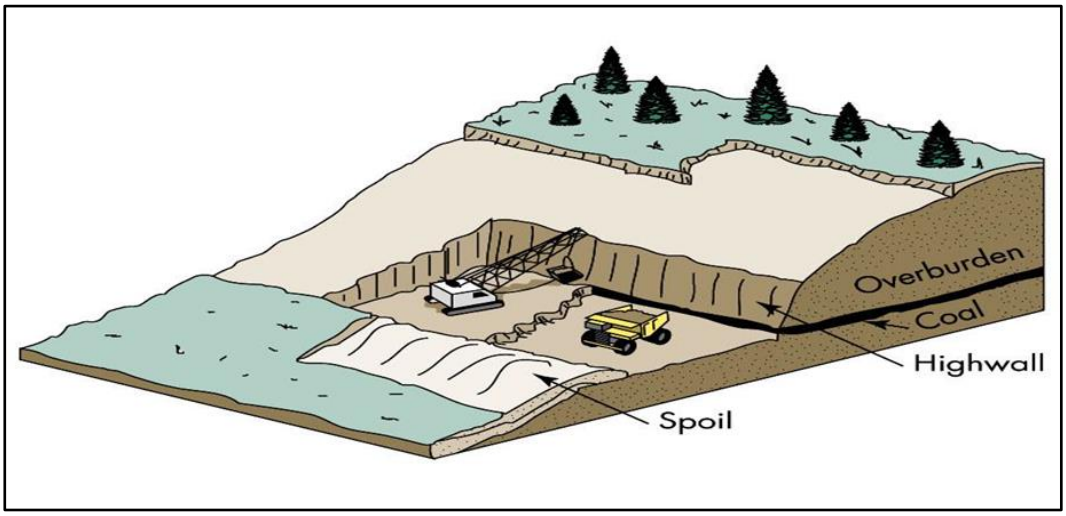
3. Acceptance of the Scoping Report

The DMPR accepted the scoping report on 04 March 2025 with conditions.

Description of Mining Method:

The mining method to be used is the highwall mining method

The mining method to be employed will be the highwall mining method, involving the establishment of a 50m wide, contour bench on hill slopes where the coal outcrops. The highwall mining machines will then cut a slot into the coal for up to 500m with a steerable continuous mining head, with the coal being brought to surface by conveyors built into a series of flexible, interlinked cassettes. Once on surface the coal will be loaded onto a conveyor belt system delivering it to the clean fuel and chemicals plant as illustrated in the technical diagrams.



Highwall and contour bench mining method.

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PART A

SCOPE OF ASSESSMENT AND ENVIRONMENTAL IMPACT ASSESSMENT REPORT

1. Introduction

Dunrose proposes to undertake coal mining activities in respect of the remaining extent of portion 1 and remaining extent of the farm Schurfde Poort 1147 GS; the farm Shaws no.11317 GS; portion 1 and the remaining extent of the farm Ganna Hoek 1317 GS; portion 1 and the remaining extent of the farm Klip Berg 2158 GT; the farm Brakfontein 1316 GS; portions 1, 2 and the remaining extent of the farm Ramak 13696 GT, situated in the Magisterial District of uThukela KwaZulu Natal Province covering an extent of 6 333,22 ha.

Dunrose has appointed Vahlengwe Mining Advisory and Consulting as the independent Environmental Assessment Practitioner (EAP) to conduct the environmental authorisation process.

In view of the above, Dunrose Investments (Pty) Ltd has lodged a mining right application (Ref No: KZN/30/5/1/2/2/10137 MR) with the Department of Mineral and Petroleum Resources (DMPR) in accordance with the relevant guidelines and regulations under the Mineral and Petroleum Resources Development Act (MPRDA) ,2002 (Act 28 of 2002) as amended. The mining right application was accepted on 25 November 2024.

The National Environmental Management Act, 1998 (Act 107 of 1998), (NEMA) and the National Environmental Management Waste Act, 2008 (Act 59 of 2008), (NEMWA) require that any person or entity that intends to undertake activities listed in GNR 983, 984 and 985 and waste management activities listed under GN 921 must obtain an environmental authorisation in terms of Section 24 of the NEMA and a waste management license in terms of part 4 of Chapter 4, Section 20 (b) of the NEMWA before undertaking such activities. Activities that will require an environmental authorisation and a waste management act were identified for the proposed mining activities. According to the amended EIA Regulations, 2014, an application for an environmental authorisation together with an application for a waste management licence for the triggered listed activities and waste management activities, must be submitted to a competent authority in line with the requirements of the above-mentioned regulations. According to the regulations, the DMPR (KwaZulu Natal Regional Office) is the competent authority (CA) for the abovementioned applications.

As per the EIA Regulations 2014, a Scoping Report and EIA process must be undertaken in such a manner that the environmental outcomes, impacts and residual risks of the activities to be undertaken are noted in the S&EIA reports and assessed accordingly by the Environmental Assessment Practitioner (EAP).

1.2. Structure of the EIA

The main purpose of this EIA/EMPr is to provide a description of the current baseline environmental conditions within the proposed project area, and to describe the identified environmental impacts and mitigation measures for the proposed activities. This document has been structured as follows to meet the requirements of Appendix 3 of the 2014 EIA Regulations, as amended in April 2017:

Chapter 1: Introduction and overview – Introduce the project and the project proponent, provides an overview of the project, provides the details of the environmental assessment practitioner (EAP), and explains the EIA process.

Chapter 2: Project Motivation – Motivates the need for and desirability of the project.

Chapter 3: EIA Process – Summarises the process being undertaken with respect to the EIA for the project, inclusive of the methodology utilised for scoping.

Chapter 4: Description of the proposed Project - Provides a summary of the key project components, the project location, scale, nature and design, discard production process, main inputs and outputs, schedule and activities during different phases of the project, inclusive of a description of the project location and the properties on which the project will take place.

Chapter 5: Project alternatives – Summarises alternatives considered by the project proponent.

Chapter 6: Policy, legal and administrative framework – Discusses the environmental policy, legal, and administrative framework applicable to the proposed project. This framework includes a summary of relevant South African regulations, the applicable administrative framework, and the environmental permitting process.

Chapter 7: Description of the environment that may be affected – Describes the current pre-project biophysical, socio-economic, and cultural status of the area, key characteristics (sensitive or vulnerable areas), important heritage resources, current land use and livelihoods.

Chapter 8: Environmental issues and potential impacts of the project - Describes the identified impacts and recommended mitigation measures.

Chapter 9: Public Consultation – This section provides a summary of the public consultation activities undertaken as part of the Scoping process and to be undertaken as part of the EIA/EMPr process.

Chapter 10: Environmental Attributes – Description of the types of environments affected by the proposed project.

Chapter 11: Impacts and Risks Identified

2. Project Applicant

The details of the project applicant are included in the Table 1 below.

Table 1: Details of the applicant

Name of Applicant:	Dunrose Investment 174 (Pty) Ltd		
Registration number (if any):	2002/031595/07		
Trading name (if any):	Dunrose Investment 174 (Pty) Ltd		
Contact person:	Mrs. Debbie James		
Physical address:	Plot 32 Rhenosterfontein Rayton 1001		
Postal address:	P.O. Box 1364 Rayton, 1001		
Postal code:	1001	**Cellphone:**	+27 82 324 7345
Email:	debbiej@inala-energy.com		

2.1. Contact person and correspondence address

2.1.1. Details of the EAP

Table 2: Details of the EAP

Name of the Practitioner:	Sunday Mabaso
Company name:	Vahlengwe Mining Advisory and Consulting
Designation:	Principal Consultant &CEO
Tel No:	+27 11 432 0062
Cell No:	+27 74 569 7312
Email Adress:	info@vahlengweadvisory.co.za sunday@vahlengweadvisory.co.za
Name of Practitioner:	Dimakatso Leholi
Company name:	Vahlengwe Mining Advisory and Consulting
Designation:	Environmental Assessment Practitioner (EAP)
Tel No:	+27 11 432 0062
Email:	dimakatso@vahlengweadvisory.co.za

2.2. Expertise of the EAP

2.2.1. The qualifications of the EAP (with evidence attached as Appendix 1)

Table 3: Qualifications and experience of the EAP.

NAME	**Sunday Mabaso**
QUALIFICATIONS	GDE: Mining Engineering, Postgrad Certificate: Climate Change and Energy Law, Certificates in Energy Efficiency and Sustainability; and Mine Closure and Rehabilitation
RESPONSIBILITY ON PROJECT	Project Leader
PROFESSIONAL REGISTRATION	EAPASA (Reg. No. 2022/4485) SAIMM (709244) IAIAsa (Reg. No. 7442) LaRSSA
EXPERIENCE	Sunday M. Mabaso is the Principal Consultant with thirty (30) in the mining industry including 20 years of service at the Department of Mineral Resources and Energy of which he served seven (7) years as a Regional Manager (3 years in Northern Cape and 4 years in Gauteng). He has acquired various qualifications in mining and an MBA with Milpark Business School and a Post Graduate Certificate in Climate Change and Energy Law with the University of the Witwatersrand, Mine Closure and Rehabilitation with the University of Pretoria. His experience includes monitoring and enforcing compliance with Social and Labour Plan and Mine Economics in terms of the MPRDA and the Mining Charter, Environmental Management and Waste Management in terms of NEMA and NEM: Waste Act. Sunday has recently published few journal papers including "Legacy Gold Mine Sites & Dumps in the Witwatersrand: Challenges and Required Action" in the Journal of Natural Resources, Vol 14, 2023. https://doi.org/10.4236/nr.2023.145005 "Social and Environmental Challenges caused by Legacy Gold Mining in Johannesburg: Government's Action Plan. eBook:

	ISBN: 978-81-19491-53-7. DOI:10.9734/bpi/npgees/v9/10672F
NAME	Dimakatso Leholi
QUALIFICATIONS	Diploma in Environmental Sciences
RESPONSIBILITY ON PROJECT	Report Compiler
PROFESSIONAL REGISTRATION	EAPASA Candidate (Reg. No. 2023/6647) Candidate Natural Scientist (Environmental Scientist) (Reg. No. 173099)
EXPERIENCE	Dimakatso is a highly motivated and environmentally conscious professional with diverse experience in education, health, safety, environment and quality (SHEQ) management, and environmental impact assessment (EIA). As an Environmental Education Facilitator at Johannesburg City Parks and Zoo, she effectively engaged diverse audiences in environmental conservation and sustainability practices. Previously she served as a SHEQ coordinator intern for a steel manufacturing company, ensuring compliance with regulatory requirements and implementing safety protocols. Currently she works as an EIA Consultant at Vahlengwe Mining Advisory and Consulting, conducting environmental assessments and providing advice to inform sustainable mining practices. She is also responsible for environmental compliance audit for mines to maintain environmental protection and safety mining practices to comply with the relevant environmental laws.

3. Description of the property.

Table 4: Description of the proposed mining right area.

Farm Name	Remaining extent of portion 1 and remaining extent of the farm Schurfde Poort 1147 GS; the farm Shaws No.11317 GS; portion 1 and the remaining extent of the farm Ganna Hoek 1317 GS; portion 1 and the remaining extent of the farm Klip Berg 2158 GT; the farm

	Brakfontein 1316 GS; portions 1, 2 and the remaining extent of the farm Ramak 13696 GT.
Application Area (Ha)	6 333,2240 Ha
Magisterial District	uThukela/Estcourt District, KwaZulu Natal Province
Distance and direction from nearest town	The project is located approximately 12km east of Colenso Town, KwaZulu-Natal, South Africa (Figure 1). Ladysmith and Estcourt are the largest towns nearby in the uThukela District in KwaZulu Natal Province. The project is accessible via the N3 toll route located south of the project area or via the regional R74 and 103 routes in South Africa.
21-digit Surveyor General Code for each farm portion	N0GS00000000131700001 N0GS00000001131700000 N0GS00000000131600000 N0GS00000000114700001 N0GT00000000215800001 N0GT00000001369600001 N0GT00000001369600002

4. Locality map

(Show nearest town, scale not smaller than 1: 250000)

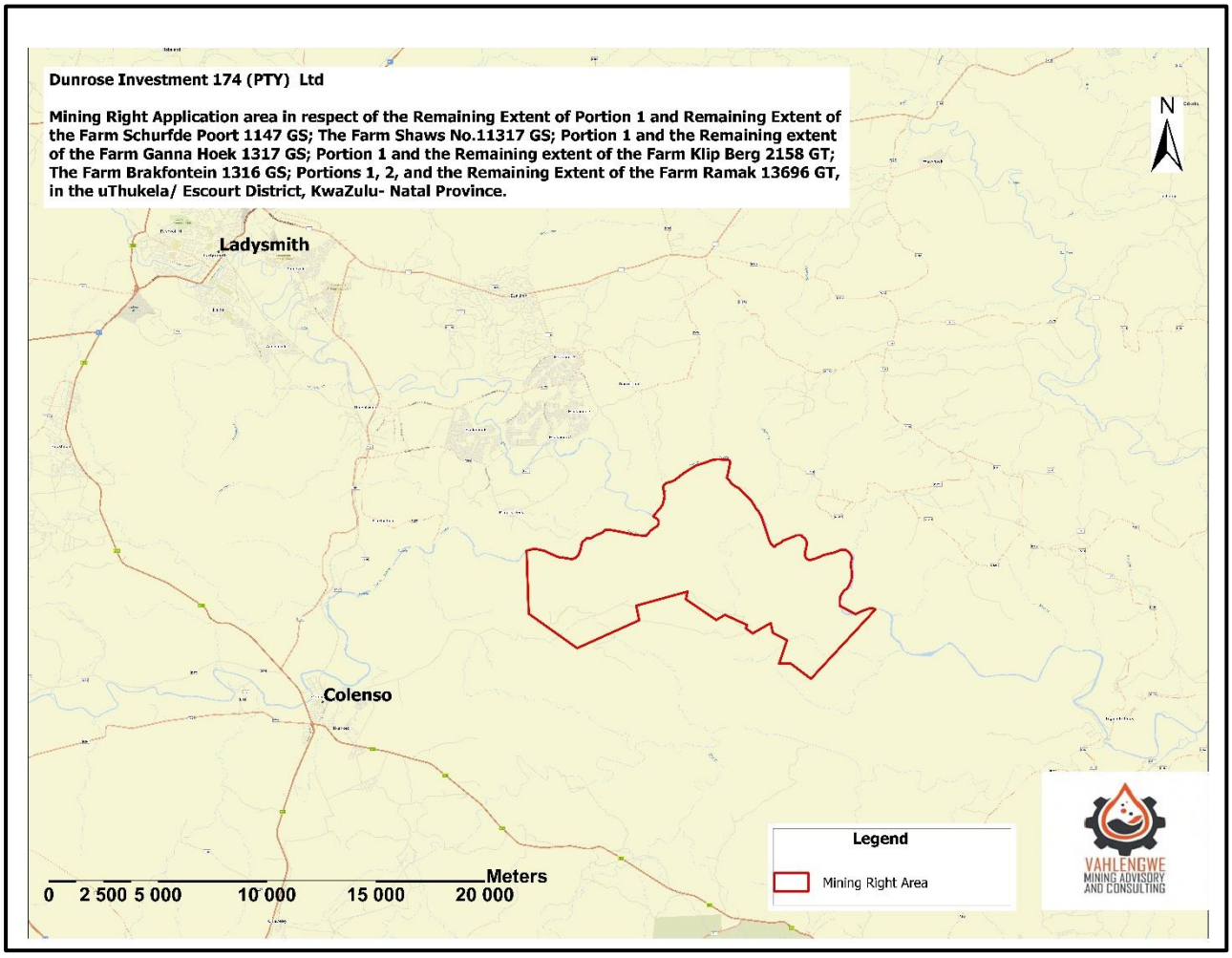


Figure 1: Locality map of the proposed mining right area.

5. Description of the scope of the proposed overall activity.

(Provide a plan drawn to a scale acceptable to the Competent Authority but not less than 1: 10 000 that shows the location, and area (hectares) of all the aforesaid main and listed activities, and infrastructure to be placed on site.)

Figure 2: Site plan map of the proposed mining right area.

5.1. Listed and specifies activities

The listed and specified activities that are linked with the Colenso Coal project are contained in the tables below.

Table 5: Listing Notice 1 activities, GNR 983 of 4 December 2014 (as amended GNR 517, 11 June 2021)

ACTIVITY NUMBER	LISTED ACTIVITY DESCRIPTION	APPLICABILITY
14	The development and related operation of facilities or infrastructure, for the storage, or for the storage and handling, of a dangerous good, where such storage occurs in containers with a combined capacity of 80 cubic metres or more but not exceeding 500 cubic metres.	It is likely that the Colenso Coal would likely need a bulk fuel storage tank with a capacity of atleast 60 cubic meters to 100 cubic meters to accommodate two FELs and one truck, depending on fuel consumption rates and operational needs.
27	The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation, except where such clearance of indigenous vegetation is required for— (i) the undertaking of a linear activity; or (ii) maintenance purposes undertaken in accordance with a maintenance management plan.	Based on the site assessment there is the potential that more than 1 hectare of indigenous vegetation will have to be cleared, and this activity will be applicable. It is however more likely that 20 hectares will be exceeded.
28	Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and were such development:	The site is currently being used for agricultural and game farming activities (such as Emaweni Ranch).

	(i) will occur inside an urban area, where the total land to be developed is bigger than 5 hectares; or (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	

Table 6: Listing Notices 2, GNR 984 of 8 December 2014 (as amended GNR 517, 11 June 2021)

ACTIVITY NUMBER	**LISTED ACTIVITY DESCRIPTION**	**APPLICABILITY**
6	The development of facilities or infrastructure for any process or activity which requires a permit or licence or an amended permit or licence in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent, excluding— (i) activities which are identified and included in Listing Notice 1 of 2014; (ii) activities which are included in the list of waste management activities published in terms of section 19 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008) in which case the National Environmental Management: Waste Act, 2008 applies;	The PCD's will require licensing in terms of section 21(g) of the NWA which governs the generation or release of pollution and as such this activity will trigger.

	(iii) the development of facilities or infrastructure for the treatment of effluent, polluted water, wastewater or sewage where such facilities have a daily throughput capacity of 2 000 cubic metres or less; or (iv) (iv) where the development is directly related to aquaculture facilities or infrastructure where the wastewater discharge capacity will not exceed 50 cubic metres per day.	
17	Any activity including the operation of that activity which requires a mining right as contemplated in section 22 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— (i) associated infrastructure, structures and earthworks, directly related to the extraction of a mineral resource; or (ii) the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing; but excluding the secondary processing of a mineral resource, including the smelting, beneficiation, reduction, refining, calcining or gasification of the mineral resource in which case activity 6 in this Notice applies.	The Colenso Coal mine is applying for a MR for anthracite coal.

19	The removal and disposal of minerals contemplated in terms of section 20 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002), including— associated infrastructure, structures and earthworks, directly related to prospecting of a mineral resource; or (ii) the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing; but excluding the secondary processing of a mineral resource, including the smelting, beneficiation, reduction, refining, calcining or gasification of the mineral resource in which case activity 6 in this Notice applies.	The Colenso Coal mine will result in the removal of a mineral (anthracite coal), so this activity will be applicable.

Table 7: Listing Notice 3 activities, GNR 985 of 8 December 2014 (as amended GNR 517, 11 June 2021).

ACTIVITY NUMBER	**LISTED ACTIVITY DESCRIPTION**	**APPLICABILITY**
14(ii)	The development of— (i) canals exceeding 10 square metres in size; (ii) channels exceeding 10 square metres in size; (iii) bridges exceeding 10 square metres in size; (iv) dams, where the dam, including infrastructure and	Construction of storm water control measures and Pollution Control Dams.

	water surface area exceeds 10 square metres in size; (v) weirs, where the weir, including infrastructure and water surface area exceeds 10 square metres in size; (vi) bulk storm water outlet structures exceeding 10 square metres in size; (vii) marinas exceeding 10 square metres in size; (viii) jetties exceeding 1 square metres in size; (ix) slipways exceeding 10 square metres in size; (x) buildings exceeding 10 square metres in size; (xi) boardwalks exceeding 10 square metres in size; or (xii) infrastructure or structures with a physical footprint of 10 square metres or more;] (i) dams or weirs, where the dam or weir, including infrastructure and water surface area exceeds 10	

	square metres; or (ii) infrastructure or structures with a physical footprint of 10 square metres or more; where such development occurs— (a) within a watercourse; (b) in front of a development setback; or (c) if no development setback has been adopted, within 32 metres of a watercourse, measured from the edge of a watercourse; excluding the development of infrastructure or structures within existing ports or harbours that will not increase the development footprint of the port or harbour.	

Table 8: Waste management activities, Schedule 1 Category A.

ACTIVITY NUMBER	**LISTED ACTIVITY DESCRIPTION**	**APPLICABILITY**
10	The construction of a facility for a waste management activity listed in Category B of this Schedule.	Establishment of overburden and discard stockpile areas.

11	The establishment or reclamation of a residue stockpiles or residue deposit resulting from activities which require a mining right, exploration right or production right in terms of the MPRDA.	The Colenso Coal mine will result in the establishment of overburden and discard stockpiles.

5.2. Description of activities to be undertaken

The Colenso Mine will occur in four phases for the mining activities as described below:

- **Pre-construction phase**: This phase will include the removal of existing infrastructure such as homesteads or farmsteads depending on the site infrastructural layout plan.
- **Construction phase:** The construction phase will take few months to be completed, which will involve activities such as site vegetation clearance, site establishment, conveyor belts, highwall construction.
- **Operational phase**: All the mine related activities/operations, such as coal removal, stockpiling, conveyor system, water or stormwater management forms part of this phase.
- **Decommissioning, rehabilitation and closure phase**: This phase will involve the removal of all infrastructure and rehabilitation of the disturbed area. The closure period as determined during the EIA Phase based on the input from the rehabilitation specialist will commence after mining has ceased.

ACTIVITY	DESCRIPTION
PRE-CONSTRUCTION	
Finalise plans and designs	Existing Mining Works Program to be updated in terms of mining layout.
Removal of existing infrastructure	Dwellings within the MRA to be removed in accordance with local custom and relocation agreements signed prior to the introduction the Relocation Action Plan requirements.
CONSTRUCTION PHASE	
Establishment of MRA	Clearing of vegetation, levelling of areas designated for mining infrastructure (Stockpile areas, pollution control facilities, etc.); establishment of the highwall.
Upgrading of haul road, construction of access roads	Roads in the operational area will be constructed to facilitate on-site vehicle movement. The

	upgrading of existing roads will commence to act as access roads and the establishment of conveyor belts will involve clearing vegetation and/or crops from the route areas. In terms of internal circulation, internal roads will be provided to allow accessibility to loading areas. All internal roads will be provided with sufficient width and turning radius to allow for movements and manoeuvring of equipment.
Highwall	A highwall exposing the coal seam will be established using conventional cut and fill mining methods thereafter underground tunnels will be developed using a highwall miner to extract the coal further deep into the seams.
ROM and product stockpiles	Vegetation will be cleared, and the initial topsoil removed and stockpiled to reuse during rehabilitation. Lining will be implemented as per DWS requirements contained in the WUL conditions,
Overburden stockpiles	As mentioned above
Pollution Control Dams	Pollution control dams will be constructed to contain dirty water runoff from the mining area. The PCD's will be HDPE lined as per WUL requirement.

Storm water management	A system of grass lined clean water channels and lined dirty water channels will be constructed to separate clean and dirty water. The pollution control dams (PCDs), cut off and dirty water drains will be constructed as early as possible during the construction phase to separate clean and dirty water. Storm water culverts will be constructed on the proposed access roads and conveyor belt pathways at the locations determined by the civil engineer.
OPERATIONAL PHASE	
On-going implementation of highwall formation	Highwall opening slots will be developed using a highwall miner to extract the coal further deep into the seams. The highwall miner is equipped with a flexible conveyor system following the cutting drum, and the coal is transported back to the surface run of mine (ROM) stockpile where it is loaded out to the clean chemical plant.
On-going vegetation clearance	Removal of vegetation cover along the coal outcrop in the areas earmarked for highwall mining and rehabilitation thereafter.
ROM Coal and product stockpiling	Run of Mine anthracite will initially be stockpiled at the pit area and will then be moved to the processing plant complex. The product will be stockpiled at the processing plant complex in the designated stockpile areas. The stockpiles will be under cover.
Disposal of dirty water in the PCDs	Potentially contaminated water from the operational areas will be diverted to the PCDs.

Storm water management	The grass lined channels will divert all clean water runoff away from the operational area and release clean water into the surrounding drainage lines via energy dispersion erosion control type structures. All dirty water runoff from the polluted areas such as the ROM stockpiles, overburden dumps, contractor's yard will be directed to the PCDs via dirty water channels. The dirty water channels will release dirty water into the PCDs. The PCDs will be lined with the lining as advised by DWS and civil engineers to prevent seepage. The water accumulating in the PCDs will then be used for dust suppression. The PCDs will be designed to ensure a capacity that can account for 1:50 year storm events and kept at a freeboard of 0.8m. The capacities required for the water management infrastructure will be determined during the hydrology study and civil engineers' designs.
Operation of bulk fuel storage facility	Diesel will be stored in above ground bunded storage tanks to prevent spillages from seeping into any underlying aquifer.
Maintaining of equipment at the workshop	Various mining machinery will be repaired and stored at the workshop. Oil traps and drums will be present to contain oil waste and spills.
Increased human activity through operation of site and security offices	The operational phase will involve the constant movement of contractors and mining employees in and around the area.

Maintaining access and haul roads	The access roads will be treated with wet suppression in combination with chemical surfactants where applicable and maintained by the appointed contractor throughout the life of mine.
General and hazardous waste management	General and hazardous waste as defined under National Environmental Management: Waste Act will be generated at the proposed mine operation. General waste will comprise concrete, rubble, glass, plastics and recyclable metals and hazardous waste will include used oils, oily rags, paint and chemicals containers etc. No disposal of general or hazardous waste will take place at the mine; such waste will be transported off-site for disposal at suitably licenced facilities. The different type of waste bins for the temporary storage of waste will be located at the contractor's yard.
Operational vehicle movement inside mining area	The operational phase will involve the constant movement of vehicles and machinery within the mining area.
Implementation of the Social and Labour Plan (SLP)	Vahlengwe has prepared and submitted a Social and Labour Plan for the proposed Colenso Coal Mine, as required of the Mining Charter and the Mineral and Petroleum Resources Development Act 28, 2002. The objectives outlined in the SLP will be implemented during the operational phase.
Concurrent rehabilitation	Continuous rehabilitation will occur during the operational phase in terms of the requirements as contained in the approved Rehabilitation and

	Closure Plan. From the rehabilitation perspective, the key factors to consider during the operational phase are to minimise the area affected by the development, minimise potential future contact of toxic or polluting materials with the environment, and to maximise the recovery and effective storage of those mining materials that will be most useful during the rehabilitation process.
DECOMMISSIONING/CLOSURE/REHABILITATION	
Rehabilitation of disturbed areas	Sealing of mined out tunnels and demolition of disused infrastructures and closing open voids and topsoiling.
Soil replacement	Product and topsoil stockpile areas will be re-vegetated with indigenous vegetation.
Water pollution control infrastructure	The PCDs along with the storm water management infrastructure will only be demolished should the area prove to be free draining with no pollution potential after rehabilitation. The areas will be cleaned, filled and landscaped during decommissioning.
Waste disposal	Large quantities of waste, including scrap metal and used oil, will be produced during the demolition of infrastructure and the operation of equipment used during decommissioning. Some disposals of general waste will take place on site although most of general and all hazardous waste will not take place on site: such waste will be transported offsite for disposal at suitably licenced facilities.

6. Policy and Legislative Context

APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT **(A description of the policy and legislative context within which the development is proposed including an identification of all legislation, policies, plans, guidelines, spatial tools, municipal development planning frameworks and instruments that are applicable to this activity and are to be considered in the assessment process)**	REFERENCE WHERE APPLIED
The Constitution of the Republic of South Africa, 1996 Under Section 24 of the Constitution of the Republic of South Africa, 1996 (the Constitution) it is clearly stated that: Everyone has the right to a) an environment that is not harmful to their health or well-being; and b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that - (i) Prevent pollution and ecological degradation; (ii) Promote conservation; and	Vahlengwe Mining Advisory and Consulting is undertaking an EIA process to identify and determine the potential impacts associated with the proposed mining activities. Mitigation measures recommended aim to ensure that the potential impacts are managed to acceptable levels to support the rights as enshrined in the Constitution.

(iii) Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.	
National Environmental Management Act, 1998 (Act No. 107 of 1998) and EIA Regulations (as amended in 2017) Section 24 (1)(a) and (b) of NEMA state that: The potential impact on the environment and socio-economic conditions of activities that require authorization or permission by law, and which may significantly affect the environment, must be considered, investigated, and assessed prior to their implementation and reported to the organ of state charged by law with authorizing, permitting, or otherwise allowing the implementation of an activity. The EIA Regulation, 2014 was published under GN R 326 on 07 April 2017 (EIA Regulations) and came into effect on 07 April 2017. Together with the EIA Regulations, the Minister also published GN R 327 (Listing Notice No. 1), GN 325 (Listing Notice No. 2) and GN R 324 (Listing Notice No. 3) in terms of Sections 24(2) and 24D of the NEMA, as amended.	Activities associated with the proposed mining activities are identified as in the Listed Activities in the Listing Notice 2, Activity No. 17 of the NEMA Regulations GN R984 (as amended).
Mineral and Petroleum Resource Development Act, 2002 (Act No. 28 of 2002) The Act makes provision for equitable access to and sustainable development of the nation's mineral and petroleum resources; and provide for matters connected therewith. Mineral and Petroleum Resource Development Act, 2002 (Act No. 28 of 2002): Mineral and Petroleum Resource Development Regulations GNR 527 of 2004; Regulation 11(1). The mining work programme must contain: -	The proposed project is applied for in terms of Section 22 of the MPRDA, 2002 (Act No. 28 of 2002) and the planned activities are according to the scope of the MWP in terms of the Mineral and Petroleum Resource Development Act, 2002 (Act No. 28 of 2002): Mineral and Petroleum Resource Development Regulations GNR 527 of 2004.

(a) the full particulars of the applicant; (b) a plan contemplated in regulation 2(2), showing the land and mining area to which the application relates; (c) a registered description of the land or area to which the application relates; (d) the details of the identified mineral deposit concerned with regard to the type of mineral or minerals to be mined, its locality, extent, depth, geological structure, mineral content and mineral distribution; (e) the details of the market for, the market's requirements and pricing in respect of the mineral concerned; (f) the details with regard to the applicable timeframes and scheduling of the various implementation phases of the proposed mining operation, and a technically justified estimate of the period required for the mining of the mineral deposit concerned; (g) a financing plan that must contain - (i) the details and costing of the mining technique, mining technology and production rates applicable to the proposed mining operation (ii) the details and costing of the technological process applicable to the extraction and preparation of the mineral or minerals to comply with market requirements (v) the details regarding other relevant costing, capital expenditure requirements, and expected revenue applicable to the proposed mining operation;	

(vi) a detailed cash flow forecast and valuation, excluding financing of the proposed mining operation, which forecast must clearly indicate how the applicable regulatory costs will be accommodated therein; (vii) the details regarding the applicant's resources or proposed mechanisms to finance the proposed mining operation, and details regarding the impact of such financing arrangements on the cash flow forecast; and (viii) provisions for the execution of the social and labour plan.	
National Environmental Management: Air Quality Act, 2004 (Act 39 Of 2004) The National Environmental Management: Air Quality Act, 2004 (No. 39 of 2004) (NEM: AQA) governs all aspects of air quality, including pollution prevention, national norms and standards, and the requirement for an Atmospheric Emissions Licence (AEL) for listed activities that emit pollutants into the atmosphere and have or may have a significant negative impact on the environment. Activities requiring an AEL are listed in GN No. 893 (22 November 2013), which was published in accordance with Section 21(1) ((b) of the NEM: AQA. According to Section 22 of NEM: AQA, no one may engage in a listed activity without an AEL.	The mining operation will not be conducting activities that may require the application for an AEL. Regulation 2 of NEMAQA: National Dust Control Regulations GN R827 (01 November 2013) indicates that the purpose of the Act is to prescribe general measures for the control of dust in all areas. Therefore, Dunrose will be required in terms of Regulation 6 and 7 of the Act to implement measures for controlling dust and conducting an Ambient Air Quality Monitoring PM10 respectively.
National Environmental Management: Waste Act, 2008 The National Environmental Management: Waste Act of 2008 (No. 59 of 2008) (NEM: WA) governs all aspects of waste management, with a focus on waste avoidance and minimization. NEM: WA	Dunrose has applied for an integrated Waste Management License for Activity 10 and Activity 11 of GNR 921. There will be activities that trigger a Waste Management Licence.

developed a system for categorizing and licensing waste management activities. Listed waste management activities that exceed certain thresholds are subject to an impact assessment and licensing process. Activities in Category A necessitate a Basic Assessment, whereas activities in Category B necessitate a Scoping and EIA process.	
National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004) (NEM:BA) The NEM:BA governs the management and conservation of South Africa's biodiversity within the framework established by NEMA. This Act also governs the protection of species and ecosystems that require national protection, as well as the management of invasive and alien species. The following regulations have been promulgated in accordance with the NEM:BA and are also relevant: • Alien and Invasive Species Lists, 2014 published (GN R.599 in GG 37886 of 1 August 2014); •National Environmental Management: Biodiversity Act, 2004: Threatened and Protected Species Regulations	Terrestrial Biodiversity Impact Study has been conducted as part of the EIA Phase.
National Noise Control Regulations, R.154 of 1992 (the Noise Regulations) promulgated in terms of Section 25 of the Environmental Conservation Act, 1989 (Act 73 of 1989) The National Noise-Control Regulations (GN R154 in Government Gazette No. 13717 dated 10 January 1992) (NCRs) form part of the Environmental Conservation Act and these Regulations apply to external noise. The NCRs differentiates between Disturbing Noise levels (which is objective and scientifically measurable which are generally compared to existing ambient noise level) and Noise Nuisance (which	An Environmental Noise Impact Assessment was undertaken during the EIA phase. The EMPr include measures to control and manage noise levels during mining activities.

is a subjective measure and is defined as noise that "disturbs or impairs or may disturb or impair the convenience or peace of any person"). Local Authorities use Controlled Areas to identify areas with high noise levels. Restrictions have been set out for development that occurs in these Controlled Areas. These regulations make provision for guidelines pertaining to noise control and measurements. The regulations make reference to the use of the South African National Standards 10103:2008 (SANS) guidelines for the Measurement and Rating of Environmental Noise with Respect to Land Use, Health, and Annoyance and to Speech Communication.	
The National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) The National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA) is the main piece of legislation in South Africa that protects and regulates the management of heritage resources. The Act requires Heritage Resources Agencies, in this case in the South African Heritage Resources Agency (SAHRA) and the Provincial Heritage Resources Authority of Gauteng (PHRA-G), to be notified of any developments that may exceed certain minimum thresholds as soon as possible.	A Heritage Impact Assessment has formed part of the EIA Phase.
National Water Act, 1998 (Act No.36 of 1998) The National Water Act (Act No. 36 of 1998) (NWA) is the primary regulatory legislation, controlling and managing the use of water resources as well as the pollution thereof in South Africa. The NWA recognises that the ultimate aim of water resource management is to achieve sustainable use of water for the benefit of all users and that the protection of the quality of water resources is necessary to ensure sustainability of the nation's water resources in the interests of all water users. The NWA	An integrated water uses licence application and where necessary an application for an exemption to comply with some of the requirements under the GN704 has been submitted to the Department of Water and Sanitation for their consideration.

presents strategies to facilitate sound management of water resources, provides for the protection of water resources, and regulates use of water by means of Catchment Management Agencies, Water User Associations, Advisory Committees and International Water Management. The National Government has overall responsibility for and authority over water resource management, including the equitable allocation and beneficial use of water in the public interest. Further, an industry can only be entitled to use water if the use is permissible under the NWA. The enforcing authority on water users is the Department of Water and Sanitation (DWS).	

7. Need and desirability of the proposed activities.

(Motivate the need and desirability of the proposed development including the need and desirability of the activity in the context of the preferred location.)

Coal mining in South Africa is a complex issue, with both need and desirability factors at play. On one hand, coal remains a significant contributor to South Africa's economy, providing employment opportunities and generating revenue. In 2025, coal mining is still expected to play a crucial role in meeting the country's energy demands, particularly for electricity generation. The potential benefits of the proposed project are:

- Coal is still a primary source of electricity generation in South Africa meeting around 38% of the country's energy demands.
- Contribution to local and national economies.
- Used in various industrial processes such as steel production, cement manufacturing, and chemical synthesis.
- Development of infrastructure.

8. Motivation for the preferred development footprint within the approved site including a full description of the process followed to reach the proposed development footprint within the approved site.

(NB! - This section is about the determination of the specific site layout and the location of infrastructure and activities on site, having taken into consideration the issues raised by interested and affected parties, and the consideration of alternatives to the initially proposed site layout.)

8.1. Details of the development footprint alternatives considered.

(With reference to the site plan provided as Appendix 4 and the location of the individual activities on site, provide details of the alternatives considered with respect to)

8.1.1. The property on which or location where it is proposed to undertake the activity

Mineral resources are by nature very difficult to locate as it requires extensive prospecting and calculated determination of stock. Minerals can only be mined where they exist. The proposed property is in an area dominated by mining activities and extensive prospecting has indicated the presence of coal on these properties. Minerals can only be mined where identified and verified, therefore it was not practical to select any other sites. No location alternative was considered.

8.1.2. The type of activity to be undertaken

The proposed coal mining will be by highwall method. The coal will be transported to the chemical plant via conveyor belts. Conveyor belts can transport large volumes of coal quickly and efficiently increasing productivity and reducing downtime. By automating the transportation process, miners are less exposed to hazardous conditions such as dust, noise and falling rocks. Reduced costs associated with manual labour, fuel and maintenance.

8.1.3. The design or layout of the activity

The design or layout of the mining activity is a multifaceted process that requires meticulous planning and consideration of various technical, safety, environmental and social factors. The mine plan involves creating a detailed geological map of the coal seam and surrounding geology, estimating the amount of coal available for mining through reserve calculation, and designing the mine layout, including the location of tunnels, shafts and other infrastructure and they should all be situated away from the drainage ways. Therefore, no alternative layout was considered.

8.1.4. The technology to be used in the activity

The various mining methods that were chosen for investigation are proven mining methods within the industry and are currently being exploited at various collieries around the country. These methods can be summarised as follow:

- Highwall mining phase 1-3: this is the initial phase that will involve the establishment of geotechnically stable highwalls from which the likes of Addcar Highwall Mining System or similar will remotely extract coal.
- Underground Mining Phase 1-2 (Subsequent 15 years): Following the highwall phase, conventional underground mining methods likely bord and pillar, will be employed to access deeper coal reserves. This will involve the excavation of main and secondary roadways, the development of working panels, and the construction of ventilation shafts and other access points.

8.1.5. The operational aspects of the activity

In terms of operations on the proposed mining area, the following is preferred:

Operational infrastructure to be situated in a concentrated area where the mine shaft will be located. Coal will be mined, crushed underground and transported to the coal ROM stockpiles. From here it will be loaded on conveyor and transported to the plant.

In terms of operations on the proposed new mining area, the following is preferred:

Operational infrastructure to be situated in a concentrated area where the mine shaft will be located. Coal will be mined, crushed underground and transported to the coal ROM stockpiles. From here it will be loaded on conveyor and transported to the chemical plant.

8.1.6. The option of not implementing the activity

The No Go option would leave the valuable resources in the ground. The no-go option would result in no economic benefit, no job creation and no supply of coal. The no go option will however impact positively on the existing way of life, especially for farmers and people living on plots.

9.1. Details of the Public Participation followed

(Describe the process undertaken to consult interested and affected parties including public meetings and one on one consultation. NB! The affected parties must be specifically consulted regardless of whether they attend public meetings. Information to be provided to affected parties must include sufficient detail of the intended operation to enable them to assess what impact the activities will have on them or on the use of their land.)

Stakeholder Identification

Stakeholder engagement is an important part of the environmental decision-making process, and it forms part of the scoping phase as well as the impact assessment phase. The process is primarily intended to provide I&APs with the opportunity to understand the proposed project. Furthermore, the purpose of consultation with the landowner, key stakeholders, and I&APs is to provide them with the necessary information about the proposed project so that they can make informed decisions about whether the project will affect them, as well as to provide the EIA team with local knowledge of the area and raise concerns about the potential biophysical, socioeconomic, and cultural impacts.

Vahlengwe's approach recognizes that I&APs are diverse in character and in their project interest.

The following criteria were used to identify I&APs:

- Zone of influence: the physical location in relation to the project site and the potential impacts. In general, the closer the affected people live to the project site, the greater their interest and the greater the potential impact of the project;
- Stakeholder values: the value that the stakeholders attach to the area that could be affected by the project. This includes aspects such as livelihood, land use, property, cultural heritage and sense of place; and
- Jurisdiction: the mandate/influence of institutions over the regulatory process and public opinion.

Interested and Affected Parties (I&APs) representing the following sectors of society have been identified in terms of Regulation 42 of the EIA Regulations R982 (as amended):

- National Authorities;
- Provincial Authorities;
- Local Authorities;
- Ward Councillors;
- Landowners.

Scoping Phase

Following the legislative requirements and good practice, it is important to develop documentation, which will be easily accessible to all stakeholders who would be affected or interested in the project.

The following documents were developed and distributed to all stakeholders including the interested and affected parties. The various PPP materials which were used as part of the EIA processes are included as appendices to this report.

Background Information Document (BID):

The BID aims to provide important information regarding the following:

- Project description of the proposed mining activities;
- The EIA and the PPP that was undertaken in support of the mining activities and relevant contact details;
- Details about how stakeholders could register as an Interested and Affected Party (I&AP) and be kept informed about the Project developments; and
- The public review and comment period for the draft Scoping Report.
- The BIDs were hand delivered to the affected and surrounding landowners. I&APs Registration

Interested and Affected Parties Form:

A registration form was distributed to the community attached to the BID for the registration of the I&APs.

Site notice:

A3 sized site notices informing I&APs about the project information as per the published newspaper advert, were developed, laminated and erected at the boundary of the proposed site as required in terms of Section 24J of NEMA read with Regulation 41 EIA regulation .Notices were also placed within the vicinity of the proposed project site at strategic locations where it was deemed to be visible to the community.

Newspaper advertisements:

A newspaper advertisement, informing all I&APs residing in surrounding communities near the proposed area within the jurisdiction of uThukela District Municipality was published and included information about Dunrose's intention to apply for a mining right for coal. The newspaper publication was conducted through Classifieds dated 13th December 2024.

I&APs were informed to register any comments or concerns that they might have, regarding the proposed project by contacting EAP, via email through the provided comments request form or request additional information via the telephone. The EAP details were included in the advert, Background Information Document (BID) and site notice.

Public meeting:

A Public Participation meeting was held at KwaNqcongo Ganna Hoek Village on the 17th of January 2025.The meeting was held to facilitate discussions on the Draft Scoping Report as well as to obtain comments, issues, concerns and inputs from the Interested and Affected Parties(I&APs). All comments raised by the stakeholders and I&APs are recorded in the Comments Response Report (CRR). The minutes of these meetings and presentation are included in this report.

Impact Assessment Phase

Background Information Document (BID):

The BID aims to provide important information regarding the following:

- Project description of the proposed mining activities;
- The EIA and the PPP that was undertaken in support of the mining activities and relevant contact details;
- Details about how stakeholders could register as an Interested and Affected Party (I&AP) and be kept informed about the Project developments; and
- The public review and comment period for the draft Environmental Impact Assessment Report.
- The BIDs were hand delivered to the affected and surrounding landowners. I&APs Registration.

Interested and Affected Parties Form:

A registration form was distributed to the community attached to the BID for the registration of the I&APs.

Site notice:

An A3 sized site notices informing I&APs about the project information as per the published newspaper advert, were developed, laminated and erected at the boundary of the proposed site as required in terms

of Section 24J of NEMA read with Regulation 41 EIA regulation notices were placed within the vicinity of the proposed project site at strategic locations where it was deemed to be visible to community.

Newspaper advertisements:

A newspaper advertisement, informing all Interested & Affected Parties (I&APs) residing in surrounding communities near the proposed area within the jurisdiction of uThukela District Municipality was published and included information about Dunrose's intention to apply for a mining right for coal. The newspaper publication was conducted through Classifieds dated 4 July 2025.

I&APs were informed to register any comments or concerns that they might have, regarding the proposed project by contacting EAP, via email through the provided comments request form or request additional information via the telephone. The EAP details were included in the advert, Background Information Document (BID) and site notice.

Notification E-mails and SMS

A notification e-mails and SMS informing the registered I&APs of the public comment period for the draft EIA were sent to the I&APs.

Draft EIA/EMPr Report Commenting Period

The draft EIA/EMPr report was made available via the Vahlengwe Mining Advisory and Consulting website (www.vahlengweadvisory.co.za). Printed copies were made available for viewing at the locations where the draft EIA &EMPr was made available. Which were placed at the uMnambithi Library, Colenso Library and Ganna Hoek farm.

9.2. Summary of issues raised by I&Aps

(Complete the table summarising comments and issues raised, and reaction to those responses)

Interested and Affected Parties (List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.)	Date Comments Received	Issues Raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or responses were incorporated.
AFFECTED PARTIES				
LANDOWNER/S				
LAWFUL OCCUPIER/S OF THE LAND				
LANDONERS OR LAWFUL OCCUPIERS ON ADJACENT PROPERTIES				
MUNICIPAL COUNCIL				
MUNICIPALITY				
GOVT OF STATE (Responsible for infrastructure that may be affected Roads				

The issues and comments will be addressed in the CRR.

Department, Eskom, Telkom, DWA)				
COMMUNITIES				
DEPARTMENT OF LAND AFFAIRS				
TRADITIONAL LEADERS				
DFFE				
OTHER COMPETENT AUTHORITIES AFFECTED				
INTERESTED AND AFFECTED PARTIES				

10. The environmental attributes associated with the development footprint alternatives.

(The environmental attributed described must include socio-economic, social, heritage, cultural, geographical, physical and biological aspects)

10.1. Baseline Environment

10.1.1. Type of environment affected by the proposed activity

(Its current geographical, physical, biological, socio-economic, and cultural character)

REGIONAL SETTING

The proposed project area is located within the Magisterial District of uThukela, KwaZulu Natal Province, as depicted in the figure below.

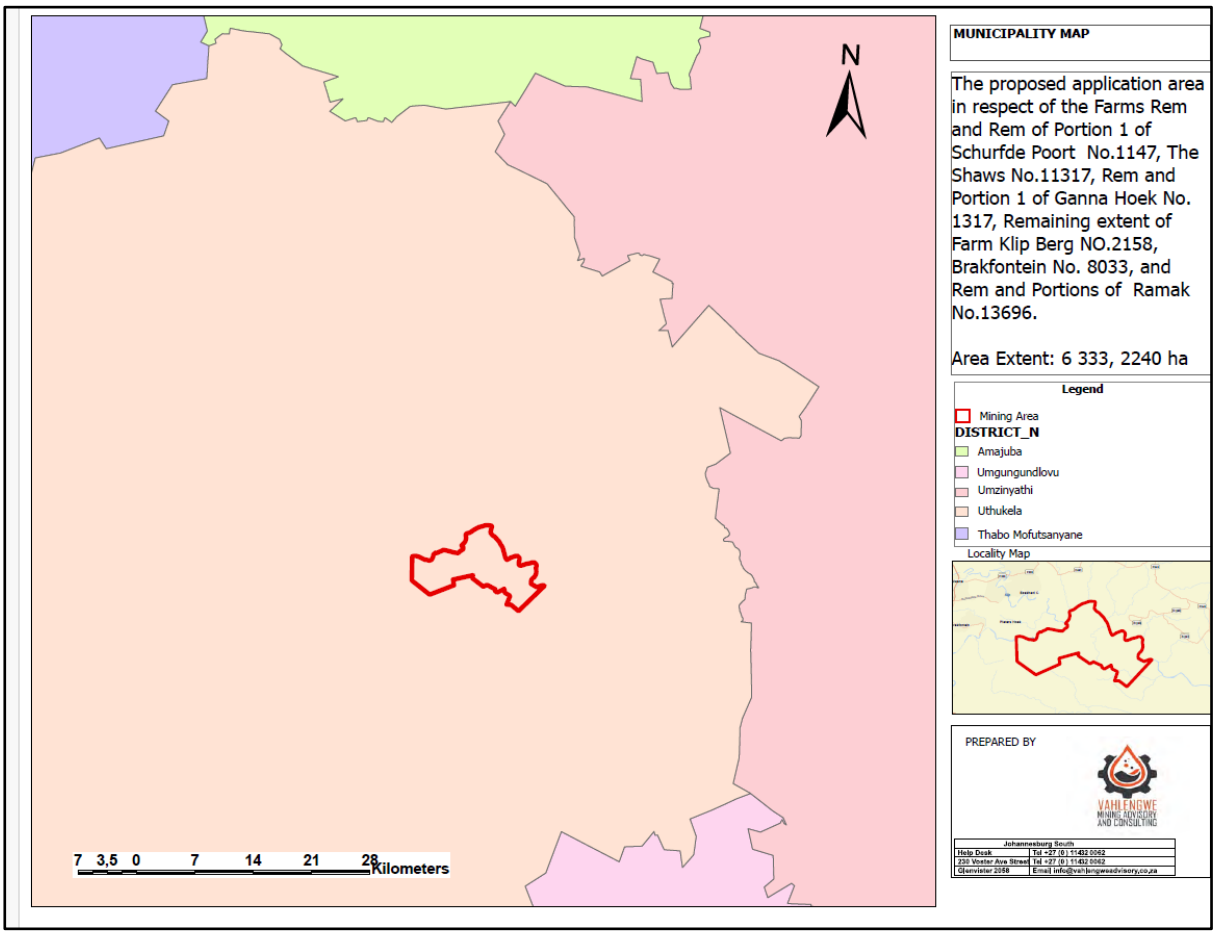


Figure 3: Municipality map

CLIMATE

The KwaZulu-Natal Province generally experiences warm to very hot summers and mild winters. Monthly average temperatures for the Ladysmith station (closest weather station to the proposed application area). Warm to hot temperatures, with average highs ranging from 28°C to 30°C (82°F to

86°F). Average low temperatures range from 15°C to 18°C (59°F to 64°F). Summer is the wettest season, with most of the annual rainfall occurring during this time. Afternoon thunderstorms are common, bringing heavy rainfall and occasional hail. Winter (June to August) mild to cool temperatures, with average highs ranging from 18°C to 20°C (64°F to 68°F). Average low temperatures range from 2°C to 6°C (36°F to 43°F). Winter is the driest season, with minimal rainfall. Frost can occur on colder mornings, especially in the surrounding rural areas.

RAINFALL

Ladysmith receives most of its rainfall during the summer months, with an average annual rainfall of around 800 mm (31.5 in). The rainfall is often characterized by heavy downpours and thunderstorms.

SUNSHINE

Ladysmith receives an average of 7-8 hours of sunshine per day throughout the year.

OTHER CLIMATE RELATED FACTORS

Ladysmith can experience occasional heatwaves during the summer months. The area is also susceptible to cold fronts during the winter months, which can bring cold temperatures and rainfall.

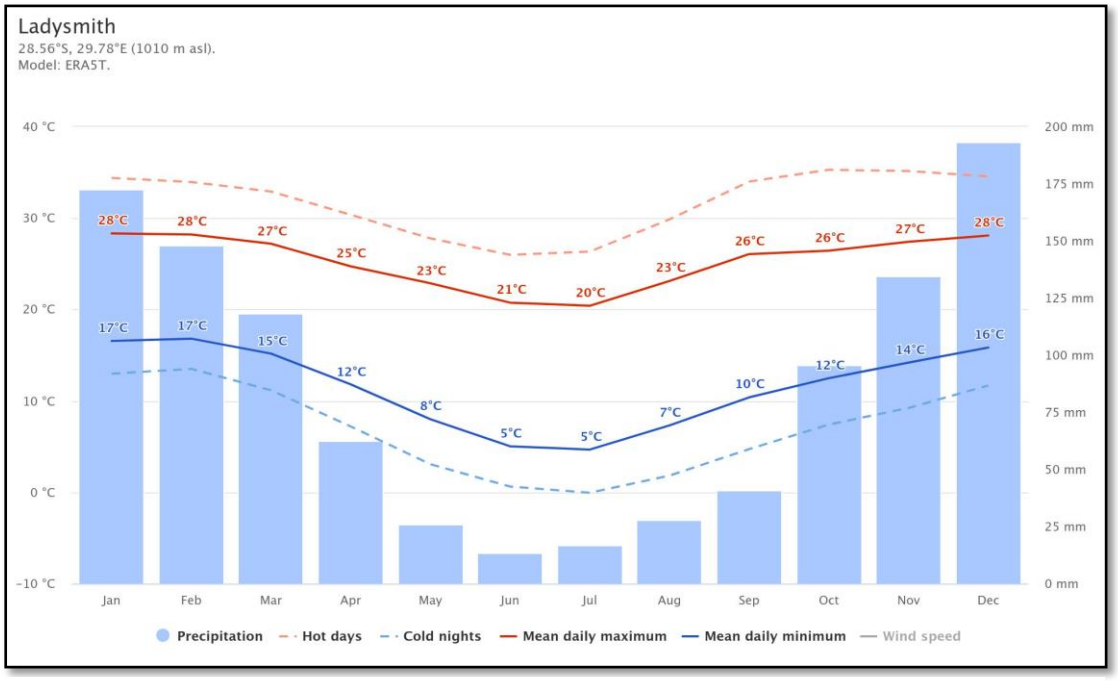


Figure 5 Climatic conditions in Ladysmith.

The Ladysmith weather station is the closest weather station to the proposed application area and is located approximately 20km north-north-west (28.567 °S; 29.750 °E) of the proposed project area. The prevailing wind field recorded at the Ladysmith weather station are represented as wind rose plots indicating the predominant wind direction and the frequency distribution of wind velocities for the proposed project area. Wind fields observed are characterised with winds occurring predominantly from the south-easterly, east south- easterly and easterly sector. Wind speeds are generally slow to moderate and frequently remain within the range 1 - 4 m/s for 68.7% of the time (Figure 4). Calm conditions, which are defined as wind speeds less than 1 m/s, occur for 14.5% of the time.

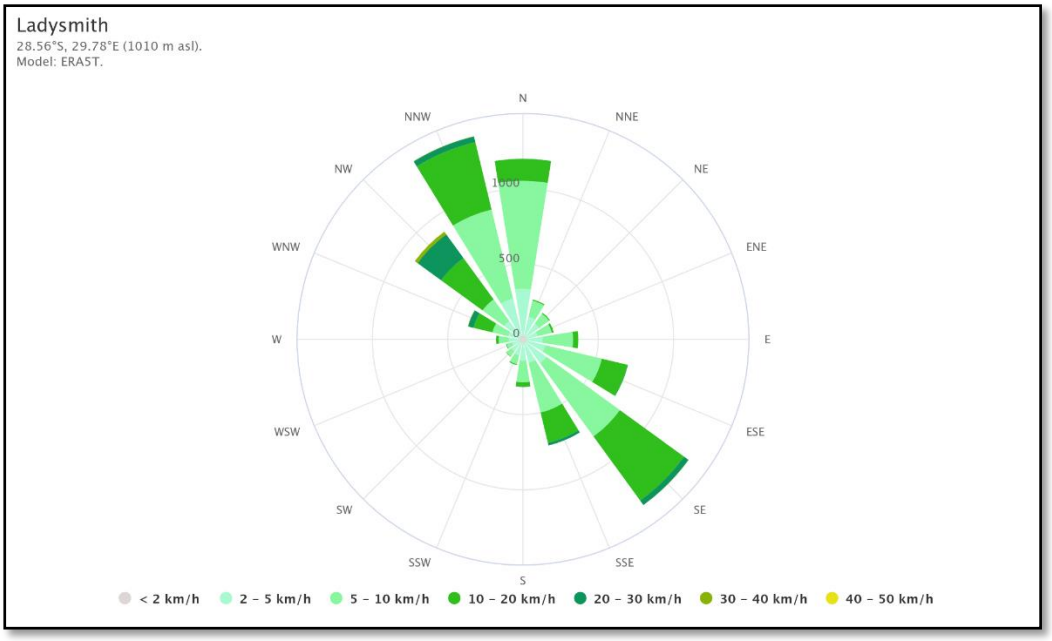


Figure 6 Windrose for Ladysmith

TOPOGRAPHY

The topography in the proposed application area is characterised by a mix of relatively flat plains, hilly terrain and incised valleys. In the south-western parts of the area the terrain is relatively flat to gently undulating with topographical variations in the form of localised hills (such as Colenso Koppie). The north-eastern part of the area is characterised by higher lying terrain that slopes down sharply toward the Tugela (Thukela) River. Overall, the topography slopes down gradually in a southern direction, with the residential community of Ezakheni in the northern parts being located on higher ground. (Gibb, SiVest, 2014)

The Tugela River carves its way across the landscape in a westerly to easterly direction, forming an incised and secluded valley with steep slopes, mountains and tall hills on either side. These mountains,

hills and ridges extend southwards towards the Bloukrans River which marks the lowest point at approximately 690m above sea level.

GEOLOGY AND SOILS

The proposed mining area is situated within the uppermost Permian-age Volkrust and Vryheid Formations belonging to the Ecca Group of the Karoo Supergroup (Johnson, M.R, van Vuuren, C.J, Visser, J.N.J, Cole, D.I, Roberts, D.L, Brandl, G, 2006). The Karoo Supergroup is the most widespread stratigraphic unit in South Africa. With a cumulative thickness of 12 km; this basin hosts all the coal resources of South Africa. The proposed mining area is located within the Klip River Coalfield. The Klip River Coalfield is the largest of the northern KwaZulu/ Natal Coalfields and is historically the most important. It is roughly triangular in shape and the area is bounded on the west by the Drakensberg Mountain Range, the Utrecht Coalfield in the east and stretches N-S from just north of Newcastle to close to Ladysmith in the south. Nine types of dolerite sills have been distinguished. The fairly rapid compositional and textural variation in the sills has complicated the regional correlation. In this coal field, the maximum displacement of strata by dolerite sills is reported to be 137m. The bottom and top seams are separated by between 0.3m and 15m of coarse grained, pebbly sandstone which fines upwards to carbonaceous shale. The bottom seam has a thickness of about 1.3m in the north of the coal seam, decreasing to 1.07m in the central area and to 50 cm in the South. The coal is predominantly bright (Bright coal, is a description of coal or a coal lithotype).

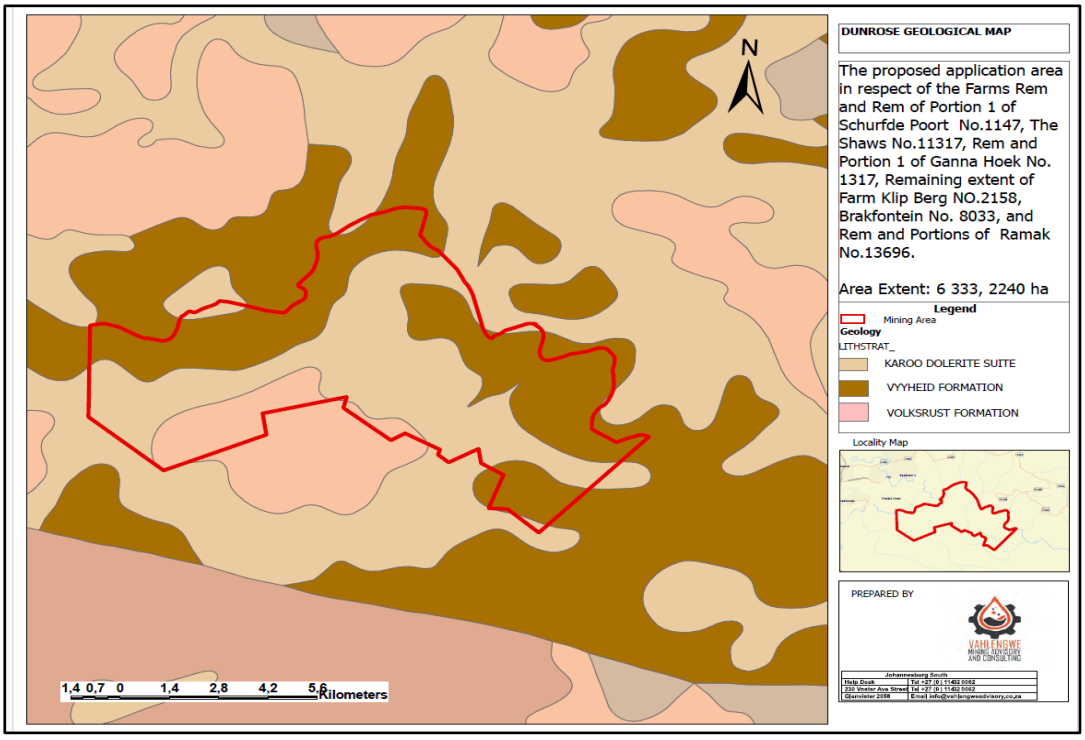


Figure 7: Geological map

SOILS

The Agricultural and Land Use Capability and Soils Impact Assessment was conducted by Nhloso Land Resources, and it is attached to this report as an Appendix.

The majority of the MRA comprised of the relatively shallow Mayo / Milkwood / Arcadia (My / Mw / Ar) soil forms, which constitute approximately 83.29% (5 325.64 ha) of the MRA. A distinction was made within the Mayo / Arcadia soil forms according to profile depth characteristics, where moderately deep Mayo / Arcadia (My / Ar) soil forms were identified contrary to their shallower counterparts. The moderately deep My / Ar soil forms comprised of 891.16 ha which amounted to 13.94% of the MRA, while the remainder 2.77% (177.2 ha) of the MRA comprised of Avalon / Bainsvlei (Av / Bv) soil forms.

CULTURAL AND HERITAGE RESOURCES

The Phase 1 Archaeological and Cultural Heritage Impact Assessment was conducted by A Pelser Archaeological Consulting as an amendment of the 2015 Phase 1 HIA Report for the Colenso Power Station project which is the same study area as the one extensively assessed in 2015. The following information was found by the specialist:

The Great Trek that started in 1838 resulted in the conflict between the Zulu, under Dingane, and the Voortrekkers under their leader Piet Retief. The resultant massacre of Retief and his party by Dingane on 6 February 1838 lead to numerous battles and skirmishes over the next year. These include, Ithaleni, Blood River, Saailager, Rensburg Koppie, Veglaer and Bloukrans. After the massacre of Retief, Dingane dispatched his impi to kill all remaining Boer parties. On the night of 16 February 1838, the laager at Bloukrans was surrounded and attacked on the morning of 17 February 1838, with approximately 282 Voortrekkers and 250 servants killed during the Battle of Bloukrans.

Colenso was established as a wagon stop in 1855 at Commando Drift, a crossing on the Tugela River. This crossing was on the main road between the then Colony of Natal and the Republic of the Orange Free State and the South African Republic. The Bulwer Bridge was constructed in 1879 along with a toll house to cross the Tugela and in 1886 the railway bridge was opened to the east of the Bulwer bridge. Colenso and the crossings of the Thukela River played a major part in the first part of the South African War (1899-1902). Between December 1899 and February 1900, a number of battles and skirmishes took place on the Natal front around Colenso (PGS 2014: 17 – 19).

Historical Heritage Resources:

1. Battle of Colenso (16 December 1899)
2. Battle of Thukela Heights that comprised of the battles and skirmishes at
3. Hlongwane Hill – 19 February 1900
4. Monte Cristo – 18 February 1900

5. Cingolo Hill – 17 February 1900

6. Hoer shoe Hill- 21 February 1900

7. Wynne's Hill – 21 February 1900

8. Hart's Hill – 23 February 1900

9. Pieters Hill – 27 February 1900

The following materials were observed:

Farmstead, homesteads, possible graves, undecorated piece of pottery, broken lower grinding stone, broken upper grinder, stone tools, MSA/LSA flakes.

HYDROLOGY AND GEOHYDROLOGY

The proposed mining area falls within Water Management Area (WMA) 7 – Thukela. The Thukela WMA lies predominantly in the KwaZulu-Natal province. It is a funnel-shaped catchment, with several tributaries draining from the Drakensberg escarpment towards the Indian Ocean. It is characterized by mountain streams in the upper reaches, where several parks and conservation areas are located (Storm Water Solutions, 2015). The Thukela WMA covers a surface area of 29 158 km2 and yields a Mean Annual Runoff (MAR) of 3 799 Mm3/a (million cubic meters per annum). The perennial Thukela River forms the northern and eastern border of the proposed mining area. The Thukela River has a Freshwater Ecosystem Priority Area (FEPA) status and a Class B PES is assigned by the DWS, which means the river is largely natural with few modifications. In terms of the FEPA status, it means that the river is considered intact and able to contribute towards river ecosystem biodiversity.

Please refer to Figure 7 for the FEPA map. For river FEPAs the whole sub quaternary catchment is shown in dark green, although FEPA status applies to the actual rivers reach within such a sub-quaternary catchment. The shading of the whole sub-quaternary catchment indicates that the surrounding land and smaller stream network need to be managed in a way that maintains the good condition (A or B ecological category) of the river reach. Upstream management areas are indicated in lighter green. These are sub-quaternary catchments in which human activities need to be managed to prevent degradation of downstream river FEPAs. Several farm dams are situated in the general area of the proposed application area.

The flood line study was conducted by Isra Consulting stated that the study area is located immediately on the right bank of Tugela River and this river is considered as Permanent River with recorded flow data.

Tugela River	
Catchment area (km)	6 802
Length of longest watercourse (km)	218
Average slope	0.027548

- The large catchment area (6,802 km²) justifies the use of the 1:100-year return period for flood line delineation, as it represents potential accumulation from the entire regional watershed.
- The longest watercourse (218 km) indicates significant flood wave propagation and transport of runoff, sediment, and potential pollutants from upstream tributaries to the study area.
- The gentle average slope (0.0275 m/m) suggests slower flow velocities in the main river, allowing floodplain storage, but floodwaters can still inundate broad areas.
- Upstream dams and tributary inflows influence peak flows but extreme events may still result in high discharge at the mining site.
- These values inform infrastructure siting, stormwater management, and mitigation measures, ensuring that mining facilities are designed and positioned to avoid or minimize impacts from 100-year floods in compliance with EIA and NWA requirements.

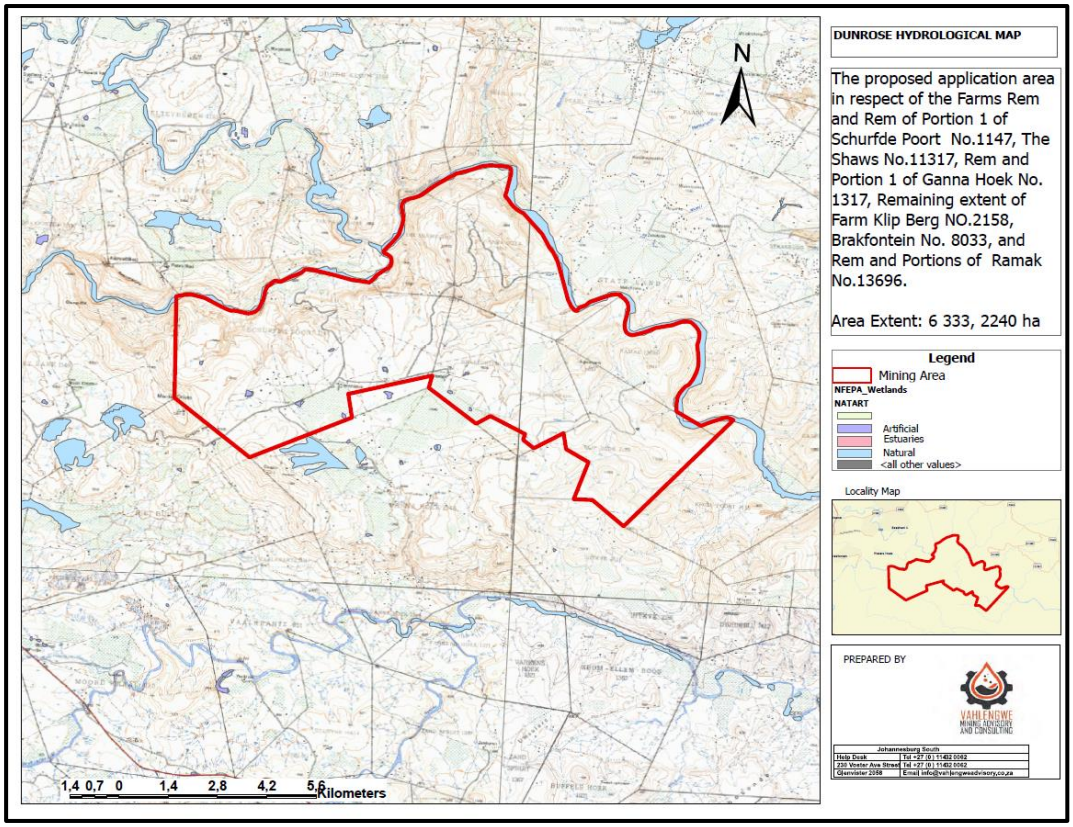


Figure 8 Hydrological map

BIOMES

A Terrestrial Biodiversity Impact Study was conducted by Mora Ecological Services. It is stated in the report that the site falls within the Savanna Biome. The Savanna vegetation of South Africa and Swaziland constitutes the southernmost extension of the most widespread biome in Africa. It represents 32.8% of South Africa (399 600 km2) and 74.2% of Swaziland (12 900 km2). It extends beyond the tropics to meet the Nama-Karoo Biome on the central plateau, the Grassland Biome at higher altitudes towards the east and extends down the eastern seaboard interior and valleys where it grades into Albany Thicket in the Eastern Cape. More specifically, savanna occupies most of the far-northern part of the Northern Cape, the western and north-eastern parts of North-West Province, extreme western parts of the Free State Province, northern Gauteng with more isolated occurrences in the south of this province, almost the entire Limpopo Province, north-western and north-eastern Mpumalanga, most of central and eastern Swaziland, low-altitude parts of the eastern seaboard, inland of the Indian Ocean Coastal Belt in KwaZulu-Natal and the Eastern Cape Provinces, and with the southernmost extension abutting Albany Thicket of the Komga to Albany Districts.

Most of the savannas are associated with old planation surfaces and are believed to represent a legacy of the vegetation which flourished during the Tertiary and even earlier geological periods when under hot, wet climatic conditions laterisation processes were active (Cole 1982, 1986). The macroclimatic patterns of the Savanna Biome region are tightly linked to climatic differences between the Atlantic and Indian Ocean coasts of the southern African subcontinent. Among the major macroclimatic traits characterising the Savanna Biome are: (1) seasonality of precipitation (alternation of wet summer and dry winter periods), and (2) (sub)tropical thermal regime with no or usually low incidence of frost. Brief inspection of maps of southern Africa featuring average temperature regime and temperature differences reveal several major trends (see Schulze & McGee 1978), such as

(a) an expected overall temperature increases towards the equator (hence the regions of Mopane Savanna bioregion showing the highest yearly temperatures),

(b) isotherms being parallel along long stretches of the coast indicating the ameliorating thermal influence of the sea, and along the Indian Ocean coast of the warm Agulhas Current, and

(c) the high summer maxima in the Kalahari region as well as increasing differences between minimum and maximum temperatures towards the interior, reflecting the thermal continentality effect. Savanna in South Africa and Swaziland does not occur at high altitudes and is found mostly below 1 500 m and extending to 1 800 m on parts of the highveld mainly along the southernmost edges of the Central Bushveld. Temperatures are therefore higher than those of the adjacent Grassland at higher altitudes. The mean daily maximum temperature for February rarely drops below 26°C and exceeds 32°C in the Kalahari region and some low altitude parts of savanna in the east (Schulze 1997a). In July this

temperature remains above 20°C for most of the area, with some temperatures at the highest altitudes dropping to 18°C.

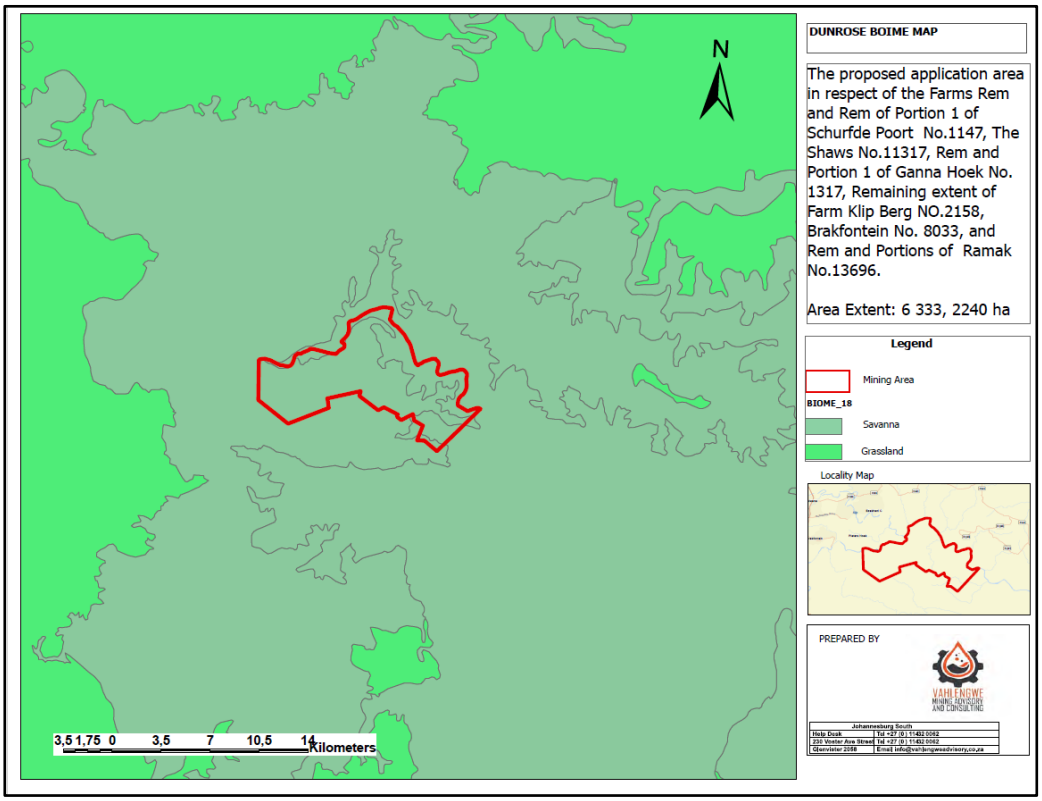


Figure 9 Biome map

VEGETATION TYPE

The proposed mining area is in a transitional zone between the Grassland and Savannah biomes (Mucina and Rutherford, 2006). Within a biome, smaller groupings referred to as bioregions can be found which provide more specific but general details as to the biophysical characteristics of smaller areas. The project areas can be found within the Sub-Escarpment Savanna and Sub- Escarpment Grassland bioregions. Going into even finer detail, vegetation units are classified which contain a set of general but more local biophysical characteristics as opposed to the entire bioregion. The proposed mining area is found within the Thukela Thornveld and the Thukela Valley Bushveld vegetation units (Mucina and Rutherford, 2006).

The largest portion of the of the proposed mining area falls within the Thukela Thornveld vegetation unit. Most of the area on the farms Schurfdepoort 1147 (remaining extent and portion 1), The Shaws 1137 and Brak Fontein 18033 consist of this vegetation type. The landscape of the Thukela Thornveld vegetation unit is characterised landscape features such as valley slopes to undulating hills. Vegetation is Acacia dominated bushveld of variable density (ranging from wooded grassland to dense thickets) with dense grassy undergrowth (Mucina and Rutherford, 2006).

Important taxa for this vegetation unit include (d = dominant species):

(a) Small Trees: Acacia natalitia (d), A. nilotica (d), A. sieberiana var. woodii, A. tortilis subsp. heteracantha, Allophylus melanocarpus, Boscia albitrunca, Clausena anisata, Cussonia spicata, Dais cotinifolia, Ziziphus mucronata.

(b) Tall Shrubs: Coddia rudis (d), Buddleja saligna, Clerodendrum glabrum, Euclea crispa subsp. crispa, Heteromorpha arborescens var. abyssinica, Hibiscus calyphyllus, Lippia javanica, Pachystigma macrocalyx, Rhus pentheri, R. rehmanniana.

(c) Low Shrubs: Barleria obtusa, Justicia flava.

(d) Soft Shrub: Peristrophe cernua.

(e) Woody Succulent Climber: Senecio brachypodus. Graminoids: Eragrostis curvula (d), Hyparrhenia hirta (d), Melinis repens (d), Panicum maximum (d),Themeda triandra (d), Tristachya leucothrix (d), Aristida congesta, Digitaria eriantha subsp. eriantha, Elionurus muticus, Eragrostis chloromelas, E.superba, Heteropogon contortus, Setaria sphacelata, Sporobolus pyramidalis.

(f) Herb: Osteospermum muricatum.

(g) Geophytic Herb: Sansevieria hyacinthoides.

(h) Succulent Herb: Aloe mudenensis.

Biogeographically important taxa / Thukela Basin endemics associated with this vegetation unit are the small tree Vitellariopsis dispar and the succulent herbs Aloe prinslooi and Orbea woodii (Mucina and Rutherford, 2006).

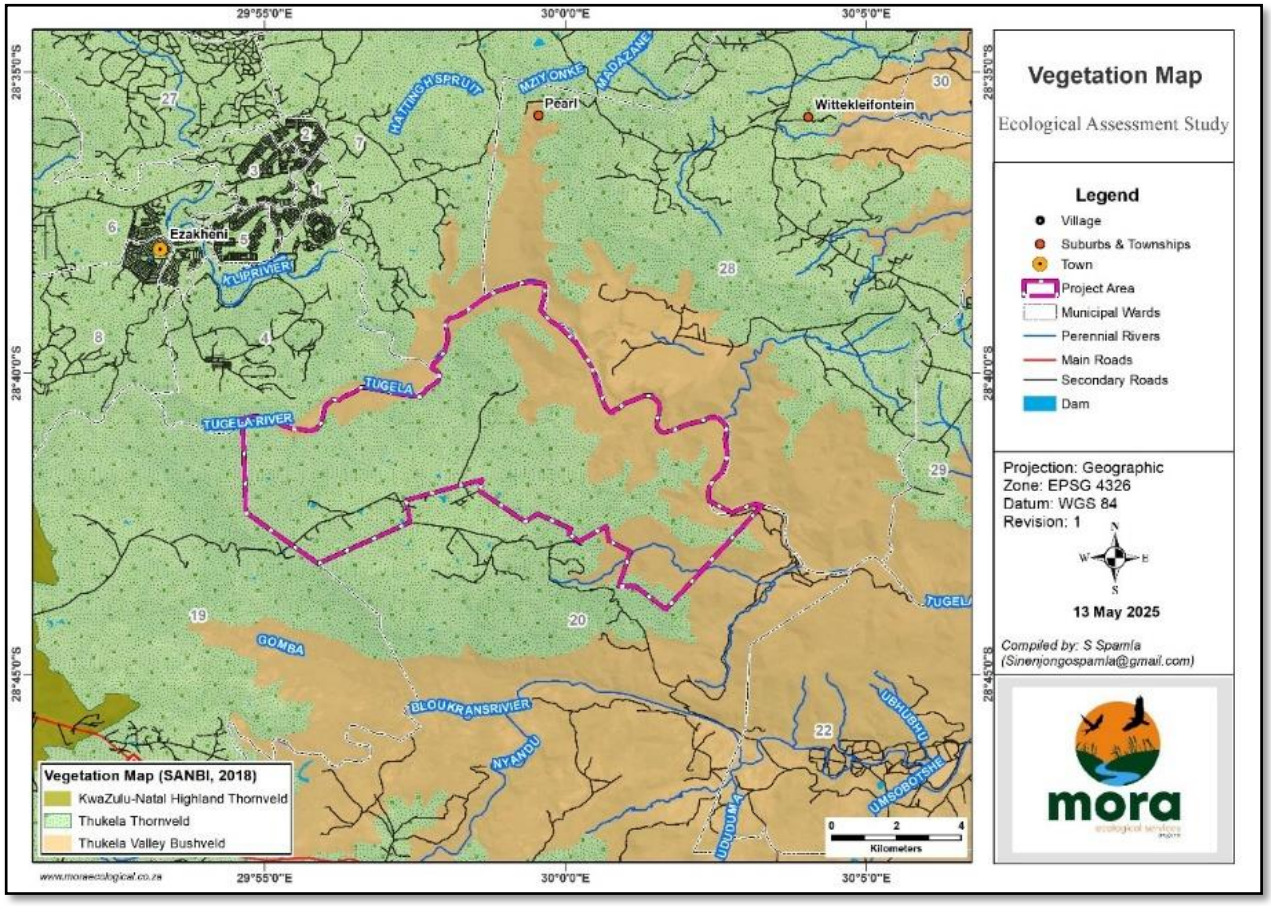


Figure 10 Vegetation map

ANIMAL LIFE

The conservation status of species for all taxa groups is based on categories determined by the International Union for Conservation of Nature (IUCN) (IUCN 2016), namely:

(a) Critically Endangered (CR) – the species is considered to be facing an extremely high risk of extinction in the wild, based on IUCN criteria.

(b) Endangered (EN) – the species is considered to be facing a very high risk of extinction in the wild, based on IUCN criteria.

(c) Vulnerable (VU) – the species is considered to be facing a high risk of extinction in the wild, based on IUCN criteria.

(d) Near Threatened (NT) – when evaluated against IUCN criteria, does not qualify for a Threatened category but is close to qualifying for or is likely to qualify in one of those categories in the near future.

(e) Data Deficient (DD) – there is inadequate information regarding the species' population size, distribution or threats for an assessment to be made. This system is designed to determine the relative

risk of extinction, with the main purpose being to catalogue and highlight those taxa that are facing a high risk of global extinction. Species listed as Critically Endangered (CR), Endangered (EN) and Vulnerable (VU) collectively are considered as Threatened (IUCN 2016).

These threatened species are published in 'Red Data Lists' reports, with the aim of identifying and highlighting those species most in need of conservation attention as well as to provide an index of the state of degeneration of biodiversity.

Family	**Common name**	**Species**	**IUCN Redlist**
Hyaenidae	Brown hyena	Hyaena brunnea	NT
Veverridae	Spotted genet	Genetta genetta	LC
Bovidae	Kudu	Tragelaphus strepsiceros	LC
Hystricidae	Porcupine	Hystrix africaeaustralis	LC
Bovidae	Springbok	Antidorcas marsupialis	LC
Bovidae	Impala	Aepyceros melampus	LC
Giraffidae	Giraffe	Giraffa camelopardalis	LC
Bovidae	Nyala	Tragelaphus angasii	LC
Suidae	Warthog	Phacochoerus africanus	LC

CONSERVATION PLAN

The KZN Biodiversity Plan (KZN BP) provides a spatial representation of land and coastal marine area required to ensure the persistence and conservation of biodiversity within KZN, reflected as Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA). The Plan has been produced as a tool for:

(a) guiding protected area expansion priority areas and identification of stewardship sites and;

(b) informing all other economic sector strategic spatial planning processes with the intention of ensuring more sustainable development in KZN.

(c) It also informs other internal EKZNW strategic processes such as alien clearing programme prioritisation, informs District Conservation Officer priorities, and

(d) informs the decisions and nature of response to development applications by the Integrated Environmental Management Unit (Ezemvelo KZN Wildlife,2016).

The mapping of Critical Biodiversity Areas (CBA) and Ecological Support Areas (ESA) is undertaken firstly at a provincial scale, with the development of the four Systematic Conservation Assessments (SCA) namely, Marine SCA, Estuarine SCA, Freshwater SCA and Terrestrial SCA, which are combined with other supporting information to form a Draft KZN Biodiversity Plan (KZN BP). Mapping then shifts to a district scale wherein the Draft KZN BP information is cut to district scale and refined by input of local knowledge to develop district specific Biodiversity Sector Plan (BSP). The BSP is then used as a framework for the development of the district Bioregional Plan (BRP) and other spatial planning tools. The site verified information is collated and included within the BSP is fed back into the next iteration of KZN Systematic Conservation Assessments (Ezemvelo KZN Wildlife, 2016). The aim of a Biodiversity Sector Plan is to:

(a) Identify and map critical biodiversity assets in KwaZulu-Natal District Municipalities.

(b) Provide associated management guidelines which aim to maintain theintegrity of these biodiversity features.

The objectives of the Biodiversity Sector Plan are to:

(a) Ensure aquatic and terrestrial biodiversity targets are met at the District level.

(b) Conserve representative samples of biodiversity pattern.

(c) Conserve the ecological and evolutionary processes that allow biodiversity to persist over time; and

(d) Serve as a first step towards the development of a Bioregional Plan.

The key purpose of the BSP is to assist and guide land use planners and managers within various district and local municipalities, to account for biodiversity conservation priorities in all land use planning and management decisions, thereby promoting sustainable development and the protection of biodiversity, and in turn the protection of ecological infrastructure and associated ecosystem services (Ezemvelo KZN Wildlife, 2015).

According to the uThukela Biodiversity Sector Plan (2015) there is an area at the west side of the application area on Portion 1 of the farm Ganna Hoek 1317 that is classified as a CBA Irreplaceable. According to the KZN Terrestrial Systematic Conservation Plan Minimum Selection Surface Layer (2010) the top features that occur in the unit, giving the area its irreplaceability value are as follows:

(a) FEATURE_1 - Sensitive Species (Restricted).

(b) FEATURE_2 - Doratogonus falcatus - A millipede with an IUCN conservation status of Least Concern.

(c) FEATURE_3 - Gulella orientalis - A snail species endemic to KZN.

(d) FEATURE_4 - Thukela Valley Bushveld - Vegetation unit not considered threatened.

(e) FEATURE_5 - Thukela Thornveld - Vegetation unit not considered threatened.

(f) FEATURE_6 - Cochlitoma simplex - Thukela Agate Snail- An endemic species with a very localised distribution in the province, abundance is unknown, C. simplex has been recognised by Ezemvelo KZN Wildlife as a species of conservation concern (Granger, 2015).

(g) FEATURE_7 - Gulella orientali-A snail species endemic to KZN.

(h) FEATURE_8 - Zinophora mudenensis - A milipede.

CBA Irreplaceable are areas which are required to meet biodiversity conservation targets and where there are no alternative sites available (Category driven by species and feature presence) and CBA Optimal are areas that are the most optimal solution to meet the required biodiversity conservation targets while avoiding high-cost areas as much as possible (Category driven primarily by process). The land use management objective for both these areas is to maintain the areas in a natural state with limited to no biodiversity loss and these areas are to be buffered by 30 m (Ezemvelo KZN Wildlife, 2015).

The uThukela Biodiversity Sector Plan (2015) also identified local corridors and Ecological Support Areas (ESAs). Several local corridors were identified in the uThukela District based on the requirement to link Protected Areas, stewardship sites and CBAs to landscape corridors while avoiding modified land.

Terrestrial Ecological Support Areas (ESAs) within the uThukela District were mapped and defined according to the following data:

(a) Landscape and local corridors.

(b) Specialist or expert input data.

(c) Species specific habitat requirements.

Terrestrial Ecological Support Areas (ESAs) are areas that are functional but not necessarily entirely natural terrestrial that are largely required to ensure the persistence and maintenance of biodiversity patterns and ecological processes within the Critical Biodiversity Areas. The areas also contribute significantly to the maintenance of ecological infrastructure. The land use management objective for Terrestrial ESAs is to maintain ecosystem functionality and connectivity allowing for some loss of biodiversity (Ezemvelo KZN Wildlife, 2015). Approximately 75% of the proposed mining site falls within areas identified as ESAs. These areas coincide with the local corridors identified for the district.

In order to facilitate the integration of the identified biodiversity criteria/information into the more general town planning processes, a guideline matrix has been included in the uThukela Biodiversity Sector Plan (2015) to enable the cross-walking of the terminology from the different spatial planning sectors. In addition, the matrix also provides guidelines as to the suitability/compatibility of different potential land use categories relative to the various conservation categories. According to the matrix the land use classified as "Extractive Industry /Quarrying and Mining" is not recommended for CBA Irreplaceable, CBA Optimal and ESA areas.

According to Section 24 (2) of NEMA The Minister, or an MEC with the concurrence

of the Minister, may identify:

(b) geographical areas based on environmental attributes, and as specified in spatial development tools adopted in the prescribed manner by the Minister or MEC, with the concurrence of the Minister, in which specified activities may not commence without environmental authorisation from the competent authority;

(c) geographical areas based on environmental attributes, and specified in spatial tools or environmental management instruments, adopted in the prescribed manner by the Minister or

MEC, with the concurrence of the Minister, in which specified activities may be excluded from the requirement to obtain an environmental authorisation from the competent authority.

To this end the Minister of Environmental Affairs, published Listing Notice 3 of 2014 in GN 984 of 4 December 2014 which was amended by GN 324 of 7 Apr 17.The geographical areas specified for the listed activity applicable to this application (Activity 12) for KwaZulu-Natal include CBAs as identified in systematic biodiversity plans adopted by the competent authority or in bioregional plans. Note that Ecological Support Areas are not identified as a specific geographical area and therefore development in these areas is not governed under Listing Notice 3. This application includes application for authorisation for the applicable Listing Notice 3 activity for the clearance of more than 300 square metres or more of indigenous vegetation in the CBA

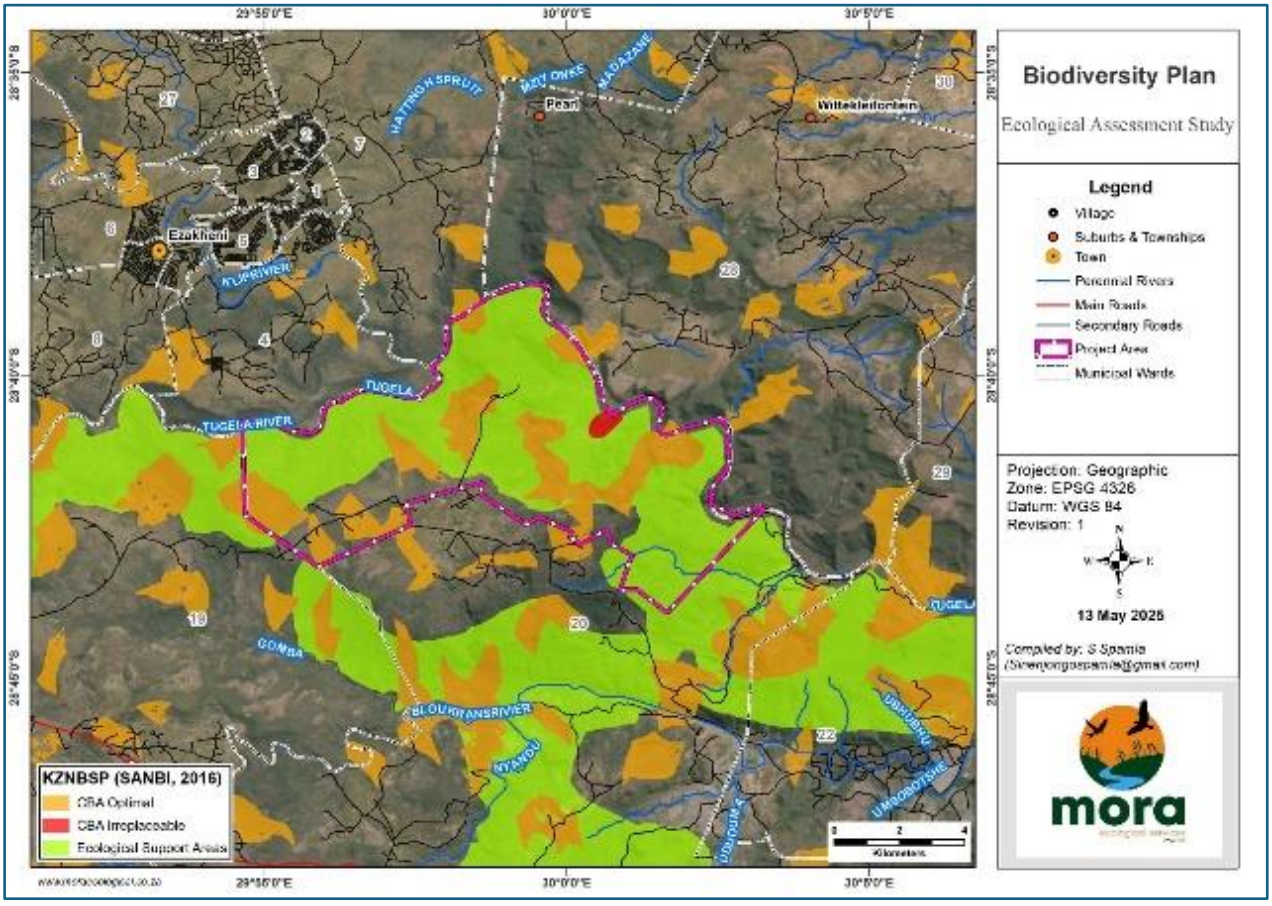


Figure 11 Critical Biodiversity Map

AIR QUALITY

The Air Quality Impact Assessment (AQIA) undertaken by Rayten Engineering Solutions during the EIA phase is attached to this report as Appendix 5. The purpose of the report was to:

- identify existing sources of emissions; and
- identify key sensitive receptors surrounding the project site.

Based on the prevailing wind fields for the period January 2022 to December 2024, emissions from activities at the proposed mine will likely be transported towards the west, west-northwest and east southeast, depending on the season and time of the day. Moderate to fast winds observed during all the time periods may result in effective dispersion and dilution of emissions from the proposed mining operations; however, higher wind speeds can also facilitate fugitive dust emissions from open exposed areas such as temporary coal stockpiles, material handling operations and other mining activities.

The discrete receptors were used for modelling purposes. These points are located at the centre of residentials areas, or near school, hospitals, old age homes, dwellings or buildings to determine the maximum concentrations that could be expected near sensitive receptors. Discrete points are not plotted for each individual sensitive receptor but are used to represent a group of sensitive receptors located near or close to each other (e.g. several schools, dwellings or buildings).

Discrete Receptor ID	**Name** **Edu= educational/school/training facilities HC= healthcare/clinic/hospital facilities Old0 old age home Residential= Dwellings/ farmhouses**	**UTM Coordinates**		**Elevation (m)**
		X (m)	Y (m)	
DR1	Dwellings/Edu (Phoweni Secondary School)	783593.43	6825731.85	1015.47
DR2	Dwellings/Edu (Umndeni Woxolo Primary School)	779482.58	6825347.41	1017.70
DR3	Dwellings/Edu (Ncinjane Secondary School)	778355.45	6825780.23	1015.41

DR4	Res (Ezakheni E)/Edu (Sakhelwe High School & Mnambithi College -E Campus)/HC (Ezakheni E Clinic)	782559.66	6829402.74	967.61
DR5	Res (Ezakheni C)/Edu (Isiqophamithi Primary School)/ HC (Ezakheni C Health Centre)	785387.63	6830383.47	1001.02
DR6	Res (Ezakheni C)/Edu (Endakane High School)	784319.47	6829380.59	979.12
DR7	Edu (Qophindela Secondary School)	785790.97	6829793.12	984.77
DR8	Edu (Ekuphumuleni Primary School)	784853.75	6830372.91	1022.92
DR9	Edu (Falethu Primary School)	785656.50	6830142.39	996.17
DR10	Res (Ezakheni D)/Edu (Ingceboyesizwe Primary School)	786578.07	6829824.71	984.71
DR11	Res (Dwellings)	788620.07	6827806.84	973.94
DR12	Res (Dwellings)	787944.85	6829235.24	977.87
DR13	Edu (Bhekintuthuko Secondary School)	788984.10	6831087.95	955.15
DR14	Res (Ezakheni B)/Edu (Ekukhuleni High School)	785533.62	6831867.83	1010.31
DR15	Res (Ezakheni B)/Edu (Mcitsheni Primary School)	785990.51	6831915.30	1011.28
DR16	Res (Ezakheni A)/Edu (Idamu Primary School & Sir Manyathi Learning Institute)	786437.18	6832280.65	1036.60
DR17	Res (Ezakheni A)/Edu (Ezakheni High School)	786165.40	6832778.21	1044.42
DR18	Edu (Gqama Primary School)	786512.53	6832911.17	1044.64
DR19	Ezakheni IA (Light Industrial Area)	778832.92	6829281.50	1010.30

DR20	Edu (Ezakheni FET College)	786219.77	6833493.20	1067.56
DR21	Edu (Amancakazana Primary School)	784941.56	6833872.08	1033.11
DR22	Res (Dwellings)/Edu (St Chads High School)	782143.80	6834918.39	1016.24
DR23	Res (St Chads)	784769.30	6835138.40	1047.07
DR24	Res (Dwellings)/Edu (Mabhomane H.P. School)	784530.25	6836387.06	1042.12
DR25	Church (Mhkuku Kunene Umthandazi)	781819.70	6819617.37	994.67
DR26	Res (Inkanyezi)/Edu (Colenso Combined School)/HC (Tholusizo Clinic)	777184.28	6817860.49	959.23
DR27	Res (Colenso)/Edu (Colenso Primary School)/Midlands Orphanage & Care Centre	775884.55	6817303.49	976.06
DR28	Res (Dwellings)/Edu (ML Sultan Colenso Primary School)	777090.77	6815781.16	980.19
DR29	Res (Dwellings)/(Edu (Indulwana Primary School)	778006.41	6813570.49	1020.01
DR30	Edu (Morning Star Primary School)	781654.46	6813123.5	949.72
DR31	Umsuluzi Game Park	780070.25	6810755.95	931.00
DR32	Weenen Nature Reserve	792576.37	6806583.65	993.89
DR33	Tugela Private Game Reserve	772711.33	6820884.68	1027.05
DR34	HC (Unjani Clinic Ezakheni)	786435.35	6831319.77	1005.66

Notes:

***DR = discrete receptor**

786435.35 6831319.77 1005.66

***<10 hospitals/healthcare/clinic facilities within 20km of site (located in surrounding areas).**

***>10 school/training/educational facilities within 20km of site (located in surrounding areas).**

***No old age home facilities identified within 20km of the project site.**

***Numerous dwellings/residential areas in surrounding areas**

NOISE

The Environmental Noise Impact Assessment was undertaken by Enviro Acoustic Research as an amendment of the report that was conducted for the Colenso Power Station in May 2014.The baseline assessment was conducted using sound pressure levels, which were measured from 19 to 21 May 2014 at one location within PFA.

Ambient sound levels were mainly dominated by natural noises (birds and some wind induced noises), though noises from a large freezer compressor did influence the measurements during with quitter periods. The ambient sound levels were elevated for an area with a rural developmental character, with various different noises (household, domestic animals and birds) impacting on the daytime sound levels, with noises from a freezer compressor mostly impacting on the night-time sound levels.

Considering the average fast-weighted sound level data collected in the area, average:

- daytime fast-weighted sound levels ranged from 39.6 to more than 70 dBA, with average sound level being 57.3 dBA. This is typical of an urban noise district, setting a potential zone sound level of 55 dBA for the daytime period; and
- night-time fast-weighted sound levels ranged from 34.8 to more than 65 dBA, with average sound levels being 40.8 dBA. This is typical of a suburban noise district, setting a potential zone sound level of 40 dBA. This is typical of a suburban noise district, setting a potential zone sound level of 40 dBA for the night-time period.

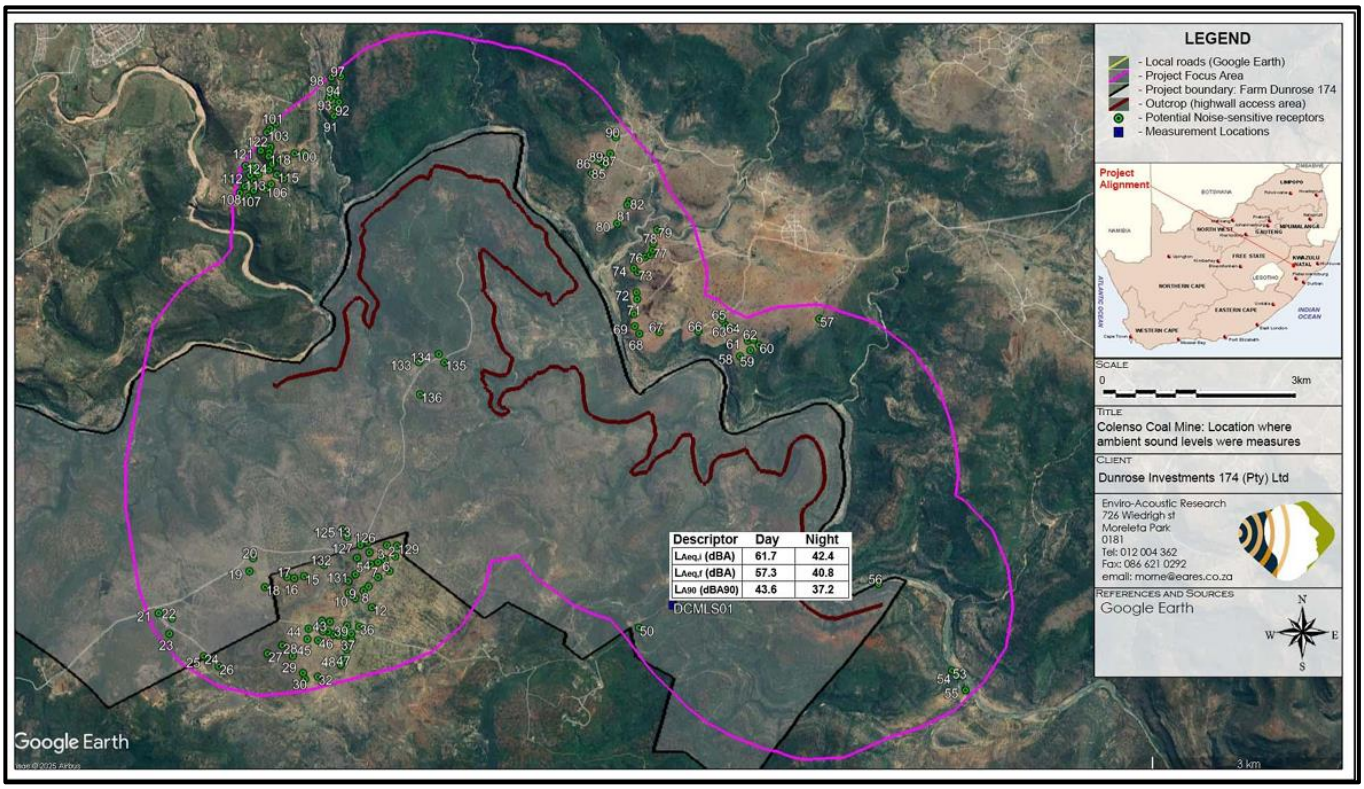


Figure 12 Localities where ambient sound levels were measured.

	La Max	Laeqi	LaeqF	La90f	Laminf
Day arithmetic average	-	61.7	57.3	43.6	-
Night arithmetic average	-	42.4	40.8	37.2	-
Day equivalent	-	63.9	60.6	-	31.6
Night equivalent	-	49.6	41.8	-	-
Day minimum	-	42.1	39.6	-	26.1
Day maximum	101.0	82.3	79.1	-	-
Night minimum	-	35.7	34.8		
Night maximum	92.4	73.5	63.6		

VISUAL

The Visual and Landscape Impact Assessment was conducted by KMG Environmental Solutions, and the visual receptors were identified and classified into the following categories:

Category	**Description**	**Examples in the Project Area**
Residential Areas	Communities and households within the visual influence zone of the project.	Rural settlements, villages, and farmsteads located near the project site.
Scenic Routes	Roads or pathways that offer scenic views and are frequently used for tourism or commuting.	Major roads, scenic drive routes in KZN, and tourism trails.
Cultural and Heritage Sites	Areas of cultural, historical, or heritage significance that may be visually impacted.	Historical landmarks, traditional Zulu heritage sites, and protected cultural landscapes.
Recreational Areas	Parks, reserves, or public spaces used for outdoor recreation and leisure.	Local nature reserves, picnic sites, and public viewpoints.
Tourist Attractions	Popular destinations for visitors and tourists that may be visually affected by the project.	Scenic lookouts, ecotourism sites, and resorts in the region.
Workplace Receptors	Industrial or commercial facilities where employees may have views of the project site.	Local businesses, agricultural farms, and nearby industrial facilities.
Transport Routes	Main roads, highways, and railway lines from which the project may be visible.	National and provincial roads that pass through the project area.

SOCIO-ECONOMIC CHARACTERISTICS

The Socio-economic Impact Assessment was conducted by Rooted Light Consulting. The application area for the mining right is located on Ward 20 of Inkosi Langalibalele Local Municipality (ILLM) which is situated within the uThukela District in the KwaZulu-Natal Province. Inkosi Langalibalele Local Municipality was established in August 2016 by the amalgamation of the Imbabazane and

uMtshezi Local Municipalities. The major towns in the Inkosi Langalibalele municipality are Estcourt, Weenen, Colenso and Ladysmith near the area. Weenen town is one of the main agricultural areas producing vegetables, citrus, groundnuts and lucerne also known as alfalfa. The application area for the mining right is strategically located in a province and district municipality that has plans to expand the mining sector and revive coal fired power stations (KZNPPC, 2016).

Ranking (Municipality) Total population

Name	Population size	Rank
Alfred Duma	415 036	1
Inkosi Langalibalele	**230 924**	**2**
Okhahlamba	143 132	3

Figure 13 Population of uThukela District Municipality.

The municipality has a total population of 230 924, with 218 675 black African people making up the majority of the population. The graph below indicates the distribution by ethnicity (Stats SA 2022) it also demonstrated that females account for 53,4 % of the people whilst males account 46,6%.

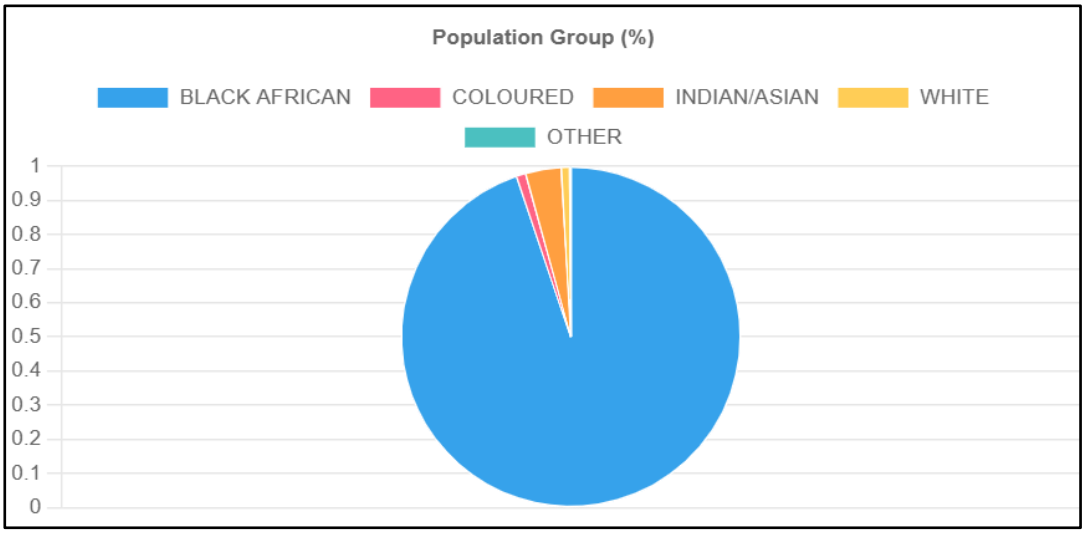


Figure 14 Population group of uThukela District.

Education is one of the key drivers of community development and economic activities. It provides a set of basic skills for development, creativity and innovative abilities of individuals within communities. Stats SA (2022) also estimates that the ILLM has a population of 13 734 (10,8%) individuals without

formal education and only with 6,5% tertiary education. The majority of the population has some high school education but not a matric certificate.

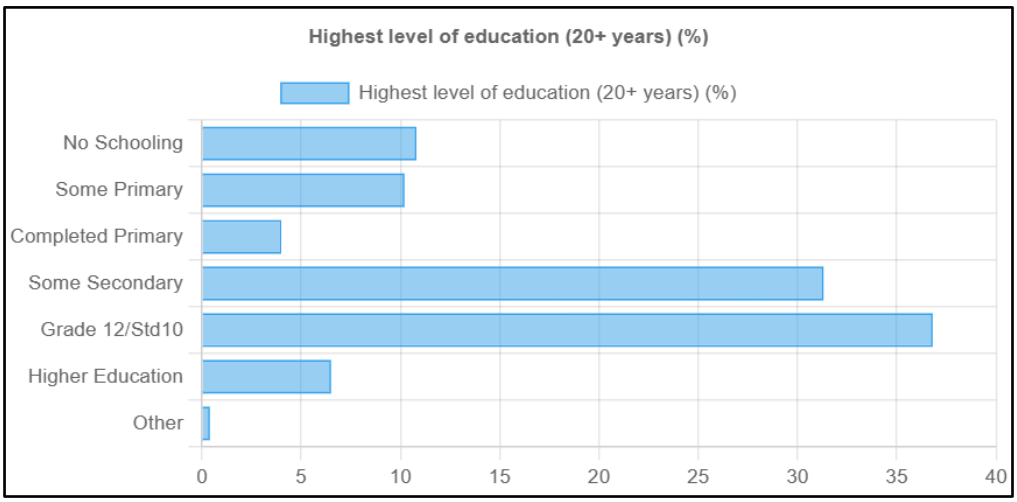


Figure 16 Education level in the ILLM.

Most South African households use a mix of energy sources including electricity, liquid petroleum gas, coal, paraffin, firewood, candles and solar energy (HESASA, 2017) for household uses such as lighting, cooking and heating. The population of Inkosi Langalibalele LM is largely dependent on wood and electricity for energy.

The graph below shows the various energy sources used.

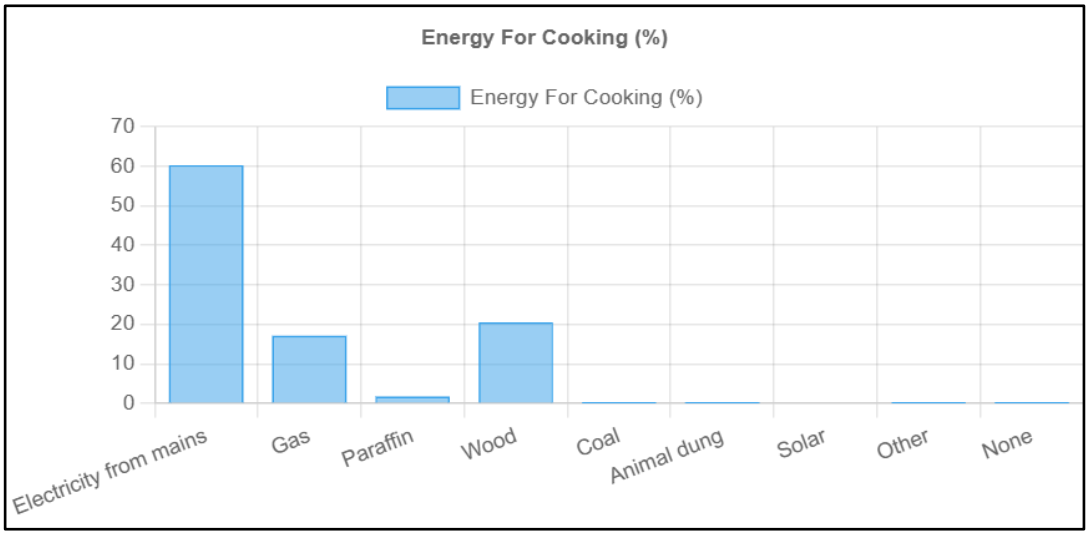


Figure 17 Energy sources used in the ILLM.

10.1.2. Description of the current land uses.

The land use in the area is characterised by natural or undeveloped areas which have been partially transformed and degraded as a result of urban transformation, rural settlement and agricultural activities in the form of livestock grazing, subsistence and commercial farming. Emaweni Game Ranch and Hunting Lodge, operated by Thukela Wildlife CC, is located on the remaining extent of the farm Klip Berg 2158. The remainder of the proposed mining site is used by the communities for subsistence farming, wood gathering and cattle grazing.

10.2. Description of specific environmental features and infrastructure on the site.

The topography in the proposed application area displays a variation of form and is characterised by a mix of relatively flat plains, hilly terrain and incised valleys. The perennial Tugela River forms the northern and eastern border of the proposed mining area. The Tugela River has a Freshwater Ecosystem Priority Area (FEPA) status and a Class B PES is assigned by the DWS. There are also a myriad of ephemeral drainage lines bisecting the area, which only contains water for short periods after rains. Several farm dams are situated in the general area of the proposed application area. A large portion of the proposed mining site consists of natural areas.

10.2.1. Environmental and current land use map.

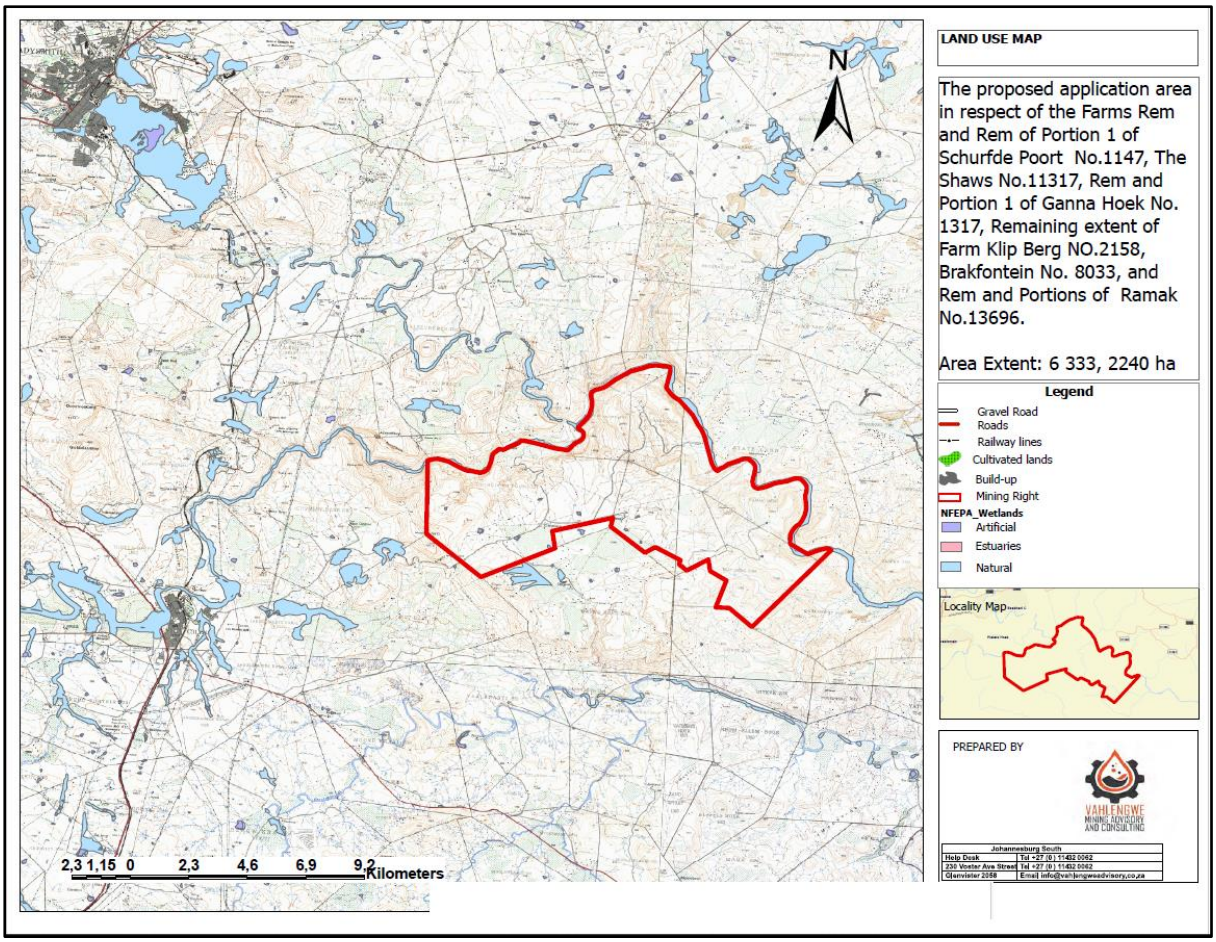


Figure 18 Environmental and land use map.

10.2.1.1. Impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts.

(Provide a list of the potential impacts identifies of the activities described in the initial site layout that will be undertaken, as informed by both the typical known impacts of such activities, and as informed by the consultations with affected parties together with the significance, probability, and duration of the impacts. Please indicate the extent to which they can be reversed, the extent to which they may cause irreplaceable loss of resources, and can be avoided, managed or mitigated.)

PROJECT ACTIVITIES IN FOUR PHASES:

ACTIVITY	DESCRIPTION
PRE-CONSTRUCTION	
Finalise plans and designs	Existing Mining Works Program to be updated in terms of mining layout.
Removal of existing infrastructure	Dwellings within the MRA to be removed in accordance with local custom and relocation

	agreements signed prior to the introduction the Relocation Action Plan requirements.
CONSTRUCTION PHASE	
Establishment of MRA	Clearing of vegetation, levelling of areas designated for mining infrastructure (Stockpile areas, pollution control facilities, etc.); establishment of the highwall.
Upgrading of haul road, construction of access roads	Roads in the operational area will be constructed to facilitate on-site vehicle movement. The upgrading of existing roads will commence to act as access roads and the establishment of conveyor belts will involve clearing vegetation and/or crops from the route areas. In terms of internal circulation, internal roads will be provided to allow accessibility to loading areas. All internal roads will be provided with sufficient width and turning radius to allow for movements and manoeuvring of equipment.
Highwall	A highwall exposing the coal seam will be established using conventional cut and fill mining methods thereafter underground tunnels will be developed using a highwall miner to extract the coal further deep into the seams.
ROM and product stockpiles	Vegetation will be cleared, and the initial topsoil removed and stockpiled to reuse during rehabilitation. Lining will be implemented as per DWS requirements contained in the WUL conditions,

Overburden stockpiles	As mentioned above
Pollution Control Dams	Pollution control dams will be constructed to contain dirty water runoff from the mining area. The PCD's will be HDPE lined as per WUL requirement.
Storm water management	A system of grass lined clean water channels and lined dirty water channels will be constructed to separate clean and dirty water. The pollution control dams (PCDs), cut off and dirty water drains will be constructed as early as possible during the construction phase to separate clean and dirty water. Storm water culverts will be constructed on the proposed access roads and conveyor belt pathways at the locations determined by the civil engineer.
OPERATIONAL PHASE	
On-going implementation of highwall formation	Highwall opening slots will be developed using a highwall miner to extract the coal further deep into the seams. The highwall miner is equipped with a flexible conveyor system following the cutting drum, and the coal is transported back to the surface run of mine (ROM) stockpile where it is loaded out to the clean chemical plant.
On-going vegetation clearance	Removal of vegetation cover along the coal outcrop in the areas earmarked for highwall mining and rehabilitation thereafter.
ROM Coal and product stockpiling	Run of Mine anthracite will initially be stockpiled at the pit area and will then be moved to the processing plant complex.

	The product will be stockpiled at the processing plant complex in the designated stockpile areas. The stockpiles will be under cover.
Disposal of dirty water in the PCDs	Potentially contaminated water from the operational areas will be diverted to the PCDs.
Storm water management	The grass lined channels will divert all clean water runoff away from the operational area and release clean water into the surrounding drainage lines via energy dispersion erosion control type structures. All dirty water runoff from the polluted areas such as the ROM stockpiles, overburden dumps, contractor's yard will be directed to the PCDs via dirty water channels. The dirty water channels will release dirty water into the PCDs. The PCDs will be lined with the lining as advised by DWS and civil engineers to prevent seepage. The water accumulating in the PCDs will then be used for dust suppression. The PCDs will be designed to ensure a capacity that can account for 1:50 year storm events and kept at a freeboard of 0.8m. The capacities required for the water management infrastructure will be determined during the hydrology study and civil engineers' designs.
Operation of bulk fuel storage facility	Diesel will be stored in above ground bunded storage tanks to prevent spillages from seeping into any underlying aquifer.
Maintaining of equipment at the workshop	Various mining machinery will be repaired and stored at the workshop. Oil traps and drums will be present to contain oil waste

	and spills.
Increased human activity through operation of site and security offices	The operational phase will involve the constant movement of contractors and mining employees in and around the area.
Maintaining access and haul roads	The access roads will be treated with wet suppression in combination with chemical surfactants where applicable and maintained by the appointed contractor throughout the life of mine.
General and hazardous waste management	General and hazardous waste as defined under National Environmental Management: Waste Act will be generated at the proposed mine operation. General waste will comprise concrete, rubble, glass, plastics and recyclable metals and hazardous waste will include used oils, oily rags, paint and chemicals containers etc. No disposal of general or hazardous waste will take place at the mine; such waste will be transported off-site for disposal at suitably licenced facilities. The different type of waste bins for the temporary storage of waste will be located at the contractor's yard.
Operational vehicle movement inside mining area	The operational phase will involve the constant movement of vehicles and machinery within the mining area.
Implementation of the Social and Labour Plan (SLP)	Vahlengwe has prepared and submitted a Social and Labour Plan for the proposed Colenso Coal Mine, as required of the Mining Charter and the Mineral and Petroleum Resources Development Act 28, 2002.

	The objectives outlined in the SLP will be implemented during the operational phase.
Concurrent rehabilitation	Continuous rehabilitation will occur during the operational phase in terms of the requirements as contained in the approved Rehabilitation and Closure Plan. From the rehabilitation perspective, the key factors to consider during the operational phase are to minimise the area affected by the development, minimise potential future contact of toxic or polluting materials with the environment, and to maximise the recovery and effective storage of those mining materials that will be most useful during the rehabilitation process.
DECOMMISSIONING/CLOSURE/REHABILITATION	
Rehabilitation of disturbed areas	Sealing of mined out tunnels and demolition of disused infrastructures and closing open voids and topsoiling.
Soil replacement	Product and topsoil stockpile areas will be re-vegetated with indigenous vegetation.
Water pollution control infrastructure	The PCDs along with the storm water management infrastructure will only be demolished should the area prove to be free draining with no pollution potential after rehabilitation. The areas will be cleaned, filled and landscaped during decommissioning.
Waste disposal	Large quantities of waste, including scrap metal and used oil, will be produced during the demolition of infrastructure and the operation of equipment used during decommissioning. Some disposals of general waste will take place on site although most of general and all hazardous

	waste will not take place on site: such waste will be transported offsite for disposal at suitably licenced facilities.

The following tables describe the significance rating of classifies impacts of the proposed project.

Impact	Points	Description
Low	(3-10)	An acceptable impact for which mitigation is desirable but not essential. The impact by itself its insufficient even in combination with other low impacts to prevent the development being approved. These impacts will result in either positive or negative medium to short term effects on the social and/or natural environment.
Medium	(11-20)	An important impact which requires mitigation. The impact is insufficient by itself to prevent the implementation of the project but which in conjunction with other impacts may prevent its implementation. These impacts will usually result in either a positive or negative medium to long term effect on the social and/or natural environment.
High	(21-30)	A serious impact if not mitigated, may prevent the implementation of the project (if it is a negative impact). These impacts would be considered by society as constituting a major and usually a long-term change to the (natural and/or social) environment and result in severe effects or beneficial effects.
Very high	(31-48)	A very serious impact which if, negative may be sufficient by itsef to prevent implementation of the project. The impact may result in permanent change. Very often these impacts are immitigable and usually result in very severe effects, or very beneficial effects.
Status		Denotes the perceived effect of on the affected area.
Positive (+)		Beneficial impact
Negative (-)		Adverse impact

Specialist studies
Archaeological and Cultural Heritage Impact Assessment
Agricultural and Soils Impact Assessment
Geotechnical Assessment
Hydrology Impact Assessment
Noise Impact Assessment
Socio-Economic Impact Assessment
Seismicity Assessment
Traffic Impact Assessment
Terrestrial Biodiversity Impact Assessment
Visual and Landscape Impact Assessment

Aspect	Phase	Impacts	Extent	Duration	Probability	Frequency
Archaeological and Cultural Heritage Impact Assessment	Construction Operational Decommissioning	The identified large number of cultural heritage (archaeological and/or historical) sites, features and material recorded in the MRA, the future operations that will result in Colenso Coal project will more than likely have an impact.	Regional	Long-term	Improbable	Annually
Agricultural and Land Capability Impact Assessment	Construction Operational Decommissioning	Land withdrawal from-ongoing livestock grazing and use.	Local	Long-term	Definite	Annually
		Fragmentation and inaccessibility of potentially arable land	Local	Long-term	Improbable	Annually
		Soil erosion	Local	Long-term	Highly probable	Annually or less.
		Soil compaction	Local	Permanent	Highly probable	6 months
		Soil contamination	Local	Permanent	Highly probable	Annually or less.
Geotechnical Assessment	Construction Operational	Other areas of planned highwall mining exhibit relatively steep slopes, not necessarily vertical, but inclined sufficiently for material to easily roll down to the working benches	Local	Medium-term	Highly probable	Annually or less.

		where the highwall mining machine will be deployed. In such instances, rockfalls and other rolling debris pose a significant hazard to mining equipment and operator safety.				
Aquatic Impact Assessment	Construction Operational	Increased runoff of sediment from the site into watercourses associated with the proposed project area during high rainfall.	Regional	Long-term	Highly probable	6 months
Noise Impact Assessment	Construction Operational Decommissioning	Noise nuisance will be created by mining activities through daytime construction.	Local	Short-term	Probable	Daily
		Nighttime construction.	Regional	Long-term	Improbable	Daily
		Worst case daytime operational activities.	Local	Long-term	Probable	Daily
		Worst case-nighttime operational activities	Regional	Long-term	Probable	Daily
Socio-economic Impact Assessment	Operational	Creation of temporary employment opportunities	Regional	Medium term	Probable	Annually or less
		Opportunities and capabilities within the supply chain	Regional	Short-term	Probable	Every 6-months

	Decommissioning	Impacts Associated with Retrenchment and Loss of Employment	National	Permanent	Definite	Daily
	Operational	Community health, safety, and security	On-site	Long-term	Definite	Daily
Traffic Impact Assessment	Construction	Additional trips to the transportation system.	On-site	Medium term	Highly probable	Daily
Terrestrial Biodiversity Impact Assessment	Construction Operational	Loss of local plant species and introduction of invasive alien species.	On-site	Short-term	Probable	Daily

11. Methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks

(Describe how the significance, probability and duration of the aforesaid identified impacts that were identified through the consultation process was determined in order to decide the extent to which the initial site layout needs revision.)

11.1. Criteria to Consider when Determining Severity of impacts:

The ranking of impacts/determination of significance is estimated using two criteria, namely consequence and probability. These consider the contributing factors / criteria listed in the legislation. The definitions of each are provided below.

The consequence of an impact resulting from an aspect is expressed as a combination of:

- Nature of impact: An indication of the extent of the damage (negative impacts) or benefit (positive impacts) the impact inflicts on natural, cultural, and/or social functions (environment).
- Extent of impact: A spatial indication of the area impacted (i.e., how far from activity the impact is realised).
- Duration of impact: A temporal indication of the how long the effects of the impact will persist, assuming the activity creating the impact ceases. For example, the impact of noise is short lived (impact ceases when activity ceases) whereas the impact of removing topsoil exists for a much longer period of time.
- Frequency of the impact occurring: An indication of how often an aspect, as a result of a particular activity, is likely to occur. Note that this does not assess how often the impact occurs. It applies only to the aspect. For example, driving takes place daily whilst other activities take place monthly while the resultant frequency of the impacts occurring will vary based on a number of factors.
- Magnitude/Severity of an impact determines to what extent will the environment be destroyed or is functions be altered by the activity.
- Significance of the impact is an indication of the importance of the impact in terms of both the physical extent and the time scale. It indicates the level of mitigation required.

Table 9 Consequence and significance rating.

Nature of Impact:		
Low	Impacts affect the environment in such a way that natural, cultural and / or social functions and processes are not affected.	1

Low-Medium	Impacts affect the environment in such a way that natural, cultural and / or social functions and processes are affected insignificantly.	2
Medium	Impacts affect the environment in such a way that natural, cultural and / or social functions and processes are altered.	3
Medium-High	Impacts affect the environment in such a way that natural, cultural and / or social functions and processes are severely altered.	4
High	Impacts affect the environment in such a way that natural, cultural and / or social functions and processes will temporarily or permanently cease.	5
Scale/Extent of Impact:		
Local	The impacted area will only extend as far as the activity being conducted, e.g., the activity footprint	1
Site	Impact occurs within a 20km radius of the site.	2
Regional	Impact occurs within a 100km radius of the site.	3
National	Impact occurs within South Africa.	4
Duration of Impact:		
Short-term	The impact will either disappear with mitigation or will be mitigated through the natural processes in shorter time span.	1
Medium-term	The impact will last up to the end of the project phases, where after it will be negated. The impact will cease within 5 years if the activity is stopped.	3
Long-term	The impact will last for the entire operational phase and after the operational life of the operation but will be mitigated by direct human action or by natural processes thereafter.	4

Permanent	Intervention will not occur in such a way or in such a time span that the impact can be considered transient.	5
Frequency of the Occurrence of the Impact:		
Annually or less	Impact occurs at least once in a year or less frequently.	1
6 months	Impact occurs at least once in 6 months.	2
Monthly	Impact occurs at least once a month.	3
Weekly	Impact occurs at least once a week.	4
Daily	Impact occurs daily.	5
Probability of the Occurrence of the impact:		
Improbable	The possibility of the impact materializing is very low either because of design or historic experience.	1
Probable	The possibility of the impact materializing will occur to the extent that provision must be made thereof	2
Highly Probable	It is most	4
Definite	The impact will occur regardless of any prevention measures.	5
Magnitude of the impacts:		
Low	The impact alters the affected environment in such a way that the natural processes are not affected.	2
Medium	The affected environment is altered; however, the functions and processes continue in a modified way.	6
High	Function or process of the affected environment is disturbed to the extent where it temporarily or permanently ceases.	8
Significance of the impact: Sum (Duration, Extent, Magnitude) x Probability		

Negligible	The impact is non-existent or unsubstantial and is of no or little importance to any stakeholder and can be ignored.	< 20
Low	The impact is limited in extent, with low to medium intensity and whatever the probability of the occurrence may be, the impact will not have a material effect on the decision and is likely to require the management intervention with increased costs.	< 40
Moderate	The impact is of importance to one or more stakeholders, and its intensity will be medium or high; therefore, the impact may materially affect the decision, and management intervention will be required.	< 60
High	The impact could render development options controversial or the project unacceptable if it cannot be reduced to acceptable levels; and/or the cost of management intervention will be a significant factor in mitigation.	> 60

This rating system is weighted in such a way as to set impacts that are very likely to occur, but have very little consequence, as Low significance. Similarly, impacts with serious consequences but that are unlikely to occur are rated lower, than impacts with serious consequences that are likely to occur.

11.2. The positive and negative impacts that the proposed activity (in terms of the initial site layout) and alternatives will have on the environment and the community that may be affected.

(Provide a discussion in terms of advantages and disadvantages of the initial site layout compared to alternative layout options to accommodate concerns raised by affected parties.)

ALTERNATIVE	OPTION	POSITIVE IMPACT	NEGATIVE IMPACT
Mining Method	Highwall	Based on the geology with the excavation as per opencast mining,	Due to complexity of geology, the establishment

		opportunities may arise to use the highwall to create adit for underground mining.	of adits will only be considered feasible once opencast activities have commenced.
	Underground	Visual impact will be less, overall environmental impacts will be reduced.	The depth of the seams as well as the complexity of the geology does not warrant underground mining options.
Transportation of Coal	Conveyor belt system	Increased efficiency and productivity.	Conveyor systems often require a fixed layout, making it difficult to reconfigure the workspace or adapt to changing production needs.
No-Go option	Termination of the Colenso Coal project	Various households will not be disturbed by relocation. Ecologically sensitive areas will not be disturbed.	Macro-economic benefits in terms of employment to locals, levies, taxes and royalties to Government and major economic contributions towards the LED plan will not be realised.

11.3. The possible mitigation measures that could be applied and the level of risk.

(With regard to the issues and concerns raised by affected parties provide a list of the issues raised and an assessment/ discussion of the mitigations or site layout alternatives available to accommodate or address their concerns, together with an assessment of the impacts or risks associated with the mitigation or alternatives considered.)

All possible mitigation measures that could be applied to risks regarding the site layout are discussed and considered as part of the EIA process. The proposed mitigation measures for the assumed risks are discussed in detail under the EIA section.

11.3.1. Motivation where no alternative sites were considered.

The Colenso Coal Project will be obliged in terms of the MPRDA to conduct the envisaged mining activities within the areas as depicted in the issued Mining Right Area as illustrated in (Regulation 2(2) Map). Therefore, no alternative sites were considered.

11.3.2. Statement motivating the alternative development location within the overall site.

(Provide a statement motivating the final site layout that is proposed)

Based on the different studies conducted and the outcome from the public consultation during the public participation process, it has been concluded that all invasive mining activities will not be undertaken in sensitive areas wherein considerate buffer zones (100m) will be created from all identified environmental sensitive and 'no-go' area.

11.4. Full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the preferred site (In respect of the final site layout plan) through the life of the activity.

(Including (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.)
Environmental Impact Assessment (EIA):

The purpose of the EIA Phase was to investigate the potential negative and positive impacts of a proposed project activities on the environment. The potential impacts were quantified to assess the significance that an impact may pose on the receiving environment. The objectives of the EIA process were to:

- Ensure that the project activities to be undertaken do not have a substantial detrimental impact on the environment by presenting management and mitigation measures that will avoid and/or reduce those impacts.
- Ensure that I&APs are informed, including the landowner, about the proposed project and the public participation process is properly followed.

- Ensure that I&APs are given an opportunity to raise concerns, and make input to understand their needs and expectations; and
- Provide a process aimed at enabling authorities to make an informed decision, especially in respect of their obligation to take environmental and social considerations into account when making those decisions.

The EIA process assessed the overall aspects that will be affected by the proposed project in relation to the activities to be conducted. A sensitivity report has been conducted to determine the sensitivity of the proposed area to make sound decision on the consideration and implementation of the mitigation measures of the impacts posed by the proposed activity.

- Extreme

These are unacceptable risks primarily critical in nature in terms of consequences in terms of the extensiveness and long-term environmental harm, permanent sacred site damage, fatality, and massive economic impacts that are effectively considered a possibility to almost certain to occur. Such risks significantly exceed the risk acceptance threshold and require comprehensive control measures, and additional urgent and immediate attention towards the identification and implementation of measures necessary to reduce the level of risk.

- High

Typically relate to significant to critical consequences including a major amount of environmental or heritage damage, and considerable safety, social or economic impacts that are inclined to cut across the possible to almost certain likelihood ratings. These are also likely to exceed the risk acceptance threshold and although proactive control measures have been planned or implemented, a very close monitoring regime and additional actions towards achieving further risk reduction is required.

- Medium

As suggested by the classification, medium level risks span a group of risk combinations varying from relatively low consequence / high likelihood to mid-level consequence / likelihood to relatively high consequence / low likelihood scenarios across environmental, social, and economic areas. These risks are likely to require active monitoring as they are effectively positioned on the risk acceptance threshold effectively positioned on the risk acceptance threshold.

- Low

These risks are below the risk acceptance threshold and although they may require additional monitoring in certain cases are not considered to require active management. In general, such risks represent relatively low likelihood and low to mid-level consequence scenarios.

- Very Low

Impacts risks that are below the risk acceptance threshold and would at the most require additional monitoring and in many cases would not require active management. These risks can include unlikely

to rare events with minor consequences and in essence relate to situations around very low probabilities of relatively minor impacts occurring.

Likelihoods have been categorised around the probability of occurrence, within the context of reasonable timeframes and frequencies given the nature of the anticipated project life.

Levels of likelihood and the severity for the types of consequences that make up the risk rating determination are defined in the Table below:

Rating	**Likelihood**	**Definitions**
5	Almost certain	The event is expected to occur in most circumstances (The event is likely to occur once per year).
4	Likely	The event will probably occur in most circumstances (The event is likely to occur once every 1 – 2 years).
3	Possible	The event might occur at some time (The event is likely to occur once every 2 – 5 years).
2	Unlikely	The event could occur at some time (The event is likely to occur once every 5 – 10 years).
1	Rare	The event may occur only in exceptional circumstances (The event is unlikely to occur in any 10-year period).

Risk Analysis Matrix

The risk controls are linked to the level of risk and opportunity for reduction to meet the project rehabilitation objectives and goals linked to an environmentally and socially responsible operation, and those requirements are part of the regulatory obligations and impact assessment guidelines. The table

below provides a summary of the qualitative risk matrix adopted and the levels of risk for the various consequence and likelihood combinations.

Risk Analysis Matrix

Table 10 Risk analysis matrix

Severity of consequence						
Likelihood		Critical (5)	Major (4)	Significant (3)	Moderate (2)	Minor (1)
	Almost certain (5)	Extreme	Extreme	High	High	Medium
	Likely (4)	Extreme	High	High	Medium	Medium
	Possible (3)	Extreme	High	Medium	Medium	Low
	Unlikely (2)	High	Medium	Medium	Low	Very Low
	Rare (1)	Medium	Medium	Low	Low	Very Low

The impact assessment will focus on the invasive activities of the project since they will have the potential to impact on the biophysical and the social environment of the proposed area. These activities include:

- Finalising plans and design
- Removal of existing infrastructure
- Establishment of the MRA
- Site infrastructure
- Upgrading of haul roads, construction of access roads
- Highwall formation
- ROM and product stockpiles
- Overburden stockpiles
- Pollution Control Dams
- Storm water management
- Dewatering of pits
- Disposal of dirty water in the PCDs
- Operation of bulk fuel storage facility
- Maintaining of equipment at the workshop

12. Assessment of each identified potentially significant impact and risk.

(This section of the report must consider all the known typically impacts of each of the activities (including those that could or should have been identified by knowledgeable persons) and not only those that were raised by registered interested and affected parties.)

Table 11 Aspect and impact risk assessment.

Aspect	Impacts	Mitigation Measures	C	L	R
Soil	Loss of soil resource due to vegetation clearing, compaction and erosion.	Schedule construction works and surface mining activities to coincide with the dry (low rainfall) season when chances of runoff and water erosion are minimal to avoid excessive soil erosion through stormwater runoff, and avoid unprecedented delays, such that the soil exposure duration is reduced to absolute minimum.	Pre-mitigation		
			2	3	M
	Soil contamination through hydrocarbon spillages.	Detailed site-specific contamination prevention measures, spill prevention and emergency spill response plans should be compiled to adequately address preventative and remedial measures to mitigate ingress of contaminants into the soils and potential leaching of contaminants into groundwater in the event of a spill and/or a leak of potentially hazardous substances into the receiving environment.	Post-mitigation		
			1	3	L
Vegetation	Disturbance of sites and species of ecological	It is recommended that the MRA be sequentially subdivided into subsections of ≤ 250 ha (preferably within the delineated soil boundaries where feasible) to avoid clearing the vegetation cover and stripping the soils all at once, and	Pre-mitigation		
			3	3	M
			Post-mitigation		

	importance;	progressively commence mining and/or install the associated infrastructure from and upgradient portion and gradually progress towards a downgradient direction such that the undisturbed downgradient portion can continuously serve as a stormwater attenuation mechanism to alleviate soil erosion.	1	3	L
Animal Life	Animal life will be affected in the immediate vicinity of the operation.	Implement a robust access control and safety measures to prevent livestock and wildlife entry into active mining areas to avoid negative impacts on livestock and wildlife populations.	Pre-mitigation		
			3	3	M
			Post-mitigation		
			1	3	L
Surface water	Soil contamination due to accidental spillages.	Stormwater run-off must be diverted away from the active mining areas to separate the clean and dirty water circuits, and mitigate potentially contaminated stormwater runoff and/or subsurface seepage into the surrounding soils.	Pre-mitigation		
			2	2	L
			Post-mitigation		
			1	2	VL
Groundwater resources	Groundwater contamination due to chemicals and hydrocarbons seepage.	Remediate using commercially available emergency clean up kits.	Pre-mitigation		
			2	2	L
			Post mitigation		
			1	2	VL

Noise	Potential loss of quiet environment	It is recommended that Colenso Coal Mine develop and implement a noise monitoring programme.	Pre-mitigation		
			3	3	M
			Post mitigation		
			2	3	M
Air Quality/Dust	Fugitive Dust – TSP, PM10 & PM2.5	Develop a dust management plan that includes: • An air quality monitoring programme for PM10, PM2.5 and dust fall monitoring. • Dust suppression measures should be focused around highwall mining (i.e. drilling), bulldozing, material transfer and temporary material storage areas. • The plan must be initiated once operations commence. Immediate clean-up of any material (i.e. coal) spillages.	Pre-mitigation		
			2	3	M
			Post-mitigation		
			1	3	L

		Conduct regular site inspections to ensure the dust mitigation measures are being implemented. Regular visual site inspections are recommended to assess whether further mitigations required for any of the dust emission sources.			
Visual	Alteration of Natural Landform and Vegetation Cover. Increased Visual Exposure from Key Viewpoints Night-Time Light Pollution	Lighting design will comply with the principles of dark-sky friendly development to preserve the natural nocturnal character of the area.	Pre-mitigation		
			3	3	M
			Post-mitigation		
			2	2	M
Socio economic	The Project will provide	Prioritise training and capacity development for the least qualified workforce members. The training initiatives should consider the levels of education of the targeted workforce and the areas of interest.	Pre-mitigation		
			1	3	L
			Post-mitigation		

	skills and training to the newly recruited workforce.		2	2	M
Health	The dust generation with potentially particulate matter, which can be inhaled, causing respiratory diseases.	All area that are sources of dust must be subjected to dust suppression. Continuous dust monitoring should be carried out throughout the project undertakings.	Pre-mitigation		
			2	3	M
			Post-mitigation		
			1	3	L
Traffic	Increase in traffic volumes on existing traffic network; and Cumulative impact on the condition of farm roads around the	Local speed limits and traffic laws shall apply at all times to minimise the occurrences of accidents on public roads; Remedy through emergency response procedures sections of existing road surfaces which have been impacted on by vehicular movement; and	Pre-mitigation		
			2	3	M
			Post-mitigation		
			1	3	L

	mining area. surface condition;				

C-Consequences

L- Likelihood

R- Residual Risks

VL- Very Low

L-Low

M-Medium

H-High

The supporting impact assessment conducted by the EAP are attached as an appendix.

13. Summary of specialist reports

(This summary must be completed if any specialist reports informed the impact assessment and final site layout process must be in the following tabular form)

A Screening Report for an Environmental Authorisation was generated from the Department of Environment, Forestry and Fisheries (DFFE) Web-based Environmental Screening Tool in terms of NEMA: EIA Regulations 2014 (as amended). The following is a summary of the environmental sensitivities of the site where the proposed mining activities are to be undertaken. The Screening Tool enables the generating of a Screening Report referred to in Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014 (as amended) whereby a Screening Report is required to accompany any application for Environmental Authorisation and as such the tool has been developed in a manner that is user friendly and no specific software or specialised GIS skills are required to operate this system (DFFE, 2021). Consequently, the mining activities will be undertaken on an area where there are no sensitivities.

Table 12 Environmental sensitivity of the proposed mining right.

Theme	**Very High Sensitivity**	**High Sensitivity**	**Medium Sensitivity**	**Low Sensitivity**
Agriculture Theme		X		
Animal Species Theme		X		
Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		

Defence Theme				X
Paleontology Theme	X			
Plant Species Theme			X	
Terrestrial Biodiversity	X			

Table 13 Specialist studies undertaken for the proposed mining right.

LIST OF STUDIES UNDETAKEN	RECOMMENDATIONS FROM THE SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT (Mark with an X where applicable)
Air Quality	1) Develop a dust management plan that includes: • An air quality monitoring programme for PM10, PM2.5 and dust fall monitoring. • Dust suppression measures should be focused around highwall mining (i.e. drilling), bulldozing, material transfer and temporary material storage areas. • The plan must be initiated once operations commence. 2) Immediate clean-up of any material (i.e. coal spillages.) 3) Conduct regular site inspections to ensure the dust mitigation measures are being implemented. Regular visual site inspections are recommended to assess whether further mitigation is required for any of the dust emission sources. Fugitive Dust – TSP, PM10 & PM2.5 & Gases Mine roads should be treated for dust suppression.	x

	Conduct regular cleaning/sweeping of road surfaces to prevent the accumulation of dust. Immediate clean-up of any spillages. 5) Switch off engines whilst not in use; It is recommended that any dust buckets installed should have wind shields attached, in accordance with the specifications provided; should not be installed within 20m of structures higher than 1m; and The stand for the container should hold the top of the container at a height of 2m above ground.	
Aquatic Ecology	-The construction camp/laydown area should be situated at a distance from the stream. -All materials associated with the construction activities should be properly stored and contained. Waste disposal from the site should be effectively managed. Adequate ablution facilities should be provided for construction workers at the construction sites, which should be located at least 30m away from the river and regularly serviced. These measures need to be addressed, implemented, and monitored according to the Environmental Management Plan (EMP) for the construction phase. -Strip and stockpile herbaceous vegetation, overlying grass and other fine organic matter along with the topsoil; -Do not strip topsoil when it is wet.	X

Agricultural and Land Use Capability	-Schedule construction works and surface mining activities to coincide with the dry (low rainfall) season when chances of runoff and water erosion are minimal to avoid excessive soil erosion through stormwater runoff, and avoid unprecedented delays, such that the soil exposure duration is reduced to absolute minimum. -Strictly limit vegetation clearance and earthworks to the immediate vicinity of the surface mining areas and infrastructure construction area as far as practically possible, such that the soils and the protective vegetation cover remain intact where underground mining technique is used to allow livestock grazing to resume as soon as possible with minimal requirement for rehabilitation works. -It is recommended that the MRA be sequentially subdivided into subsections of ≤ 250 ha (preferably within the delineated soil boundaries where feasible) to avoid clearing the vegetation cover and stripping the soils all at once, and progressively commence mining and/or install the associated infrastructure from and upgradient portion and gradually progress towards a downgradient direction such that the undisturbed downgradient portion can continuously serve as a stormwater attenuation mechanism to alleviate soil erosion. -Detailed site-specific contamination prevention measures, spill prevention and emergency spill response plans should be compiled to adequately address preventative and remedial measures to mitigate ingress of contaminants into the soils and potential leaching of contaminants into groundwater in the event of a spill and/or a leak of potentially hazardous substances into the receiving environment.	X

	-The prescribed waste management protocols and all applicable legislative requirements should be adhered to throughout the design, construction, operational, and closure phases of the proposed mining activities. Efforts should be made to decommission all the associated facilities and infrastructure as soon as they are no longer in use ans subsequently rehabilitated to re-instate pre-mining livestock grazing and wildlife browsing. -Approximately 200 mm of the stripped topsoil from the proposed excavation containments must layered over rehabilitation areas and seeded with a mixture of indigenous grasses improve revegetation success during decommissioning and closure phase, and the progress of the re-vegetation must be monitored and continuously improved to the satisfaction of the regulating authority to ensure successful rehabilitation post closure. Soil compaction (where encountered) can be alleviated by ripping the soils to at least 300 mm below ground surface using appropriate tillage implements to physically loosen the soil, during rehabilitation. -It is recommended that the soil contamination monitoring, as well as surface water and groundwater quality monitoring programme be implemented and reviewed by the regulating authorities throughout the duration of the proposed mining activities and continued on an annual basis to the satisfaction of the regulating authorities post-closure. -The rehabilitation and mine closure design should be evaluated and approved by an	

	experienced geotechnical expert to assess potential risk of subsidence from the underground mining areas and ensure the integrity of the final landscape design post-closure.	
Archaeological and Heritage	Chance Find Protocol A CFP will ensure that should any previously unknown sites, features or significant cultural material deposits are uncovered that these are reported to and investigated by a Heritage Specialist who will then provide recommendations on the way forward in terms of mitigation. Initial Identification and/or Exposure (Chance Find) If during the construction, operations, or closure phases of this project, any person employed by the developer, one of its subsidiaries, contractors and subcontractors, or service provider, find any artefact of cultural significance, this person must cease work at the site of the find. They must report this find to their immediate supervisor, and through their supervisor to the senior on-site manager. •Chance Find Protocol: Heritage Resources In the event that previously unidentified heritage resources are identified and/or exposed during construction or operation of the project, the following steps must be	X

	implemented subsequent to those outlined above: • The project archaeologist must be notified of the discovery; • The project archaeologist will visit the site for a field-based assessment of the finds and appropriate mitigation measures will then be presented to the developer; • Should the specialist conclude that the find is a heritage resource protected in terms of the NHRA (1999) Sections 34, 35, 37 and NHRA (1999) Regulations (Regulation 38, 39, 40), the project archaeologist will notify the South African Heritage Resources Agency (SAHRA) and/or the Provincial Heritage Resources Agency Gauteng (PHRAG) on behalf of the developer; and •Based on the comments received from SAHRA and/or PHRA-G, the project archaeologist will provide the developer with a Terms of References Report and relevant associated costs if necessary. Chance Find Protocol: Burials and Graves In the event that previously unidentified burial grounds and graves are identified and/or exposed during construction or operation of the project, the following steps must be implemented subsequent to those outlined above:	

	•The project archaeologist must immediately be notified of the discovery in order to take the required further steps: •The local South African Police Service (SAPS) will be notified on behalf of the developer; •The project archaeologist will inspect the exposed burial and determine in consultation with the SAPS if any additional graves may exist in the vicinity as well as the temporal context of the remains, i.e.: Forensic Authentic burial/grave (informal or older than 60 years, NHRA (1999) Section 36); or Archaeological (older than 100 years, NHRA (1999) Section 38); • Should the specialist conclude that the find is a heritage resource protected in terms of the NHRA (1999) Section 36 and NHRA (1999) Regulations (Regulation 38, 39, 40), the project archaeologist will notify SAHRA and/or LIHRA on behalf of the developer; •SAHRA's Burial Grounds & Graves Unit (BBG Unit) may require that an identification of interested parties, consultation and /or grave relocation take place; Consultation must take place in terms of NHRA (1999) Regulations 39, 40, 42; and 5. Grave relocation must take place in terms of NHRA (1999) Regulations 34.	

Geotechnical Assessment	Vertical Steep Slopes Mitigation: When mining in the vicinity of such vertical slopes, a wire mesh draping system should be extensively used to secure the highwall. This system, often combined with rock bolts, helps to contain loose rock fragments and prevent large-scale spalling (American Mine Services, "Highwall Safety"). Crucially, a highwall movement monitoring radar (such as the highwall radar from Ground Probe) must be deployed to continuously monitor the highwall for any deformation in real-time, providing early warnings for potential instability. This real-time monitoring is a critical component of a proactive geotechnical risk management strategy. To preserve the strength and durability of the shales and sandstones in the highwall toe planned for mining, it is strongly recommended that highwall toe exposure is not conducted for elongated periods in advance (i.e., not more than 24 months in advance of mining). Limiting exposure time reduces the opportunity for weathering processes to significantly degrade the rock mass, thereby maintaining its integrity for safer and more efficient highwall mining operations. Highwall Support and Rockfall Prevention:	X

	Highwall Wire-Mesh Draping: This involves covering the highwall face with high-tensile steel mesh, which is then secured with rock bolts or cable anchors. Its primary function is to contain loose or spalling rock, preventing small-scale rockfalls from reaching the bench or damaging equipment. It is particularly effective in fractured or highly weathered rock faces where surface unravelling is a concern. The mesh also provides a visual barrier against personnel approaching unstable zones. Rock Bolting: Steel bolts (e.g., mechanical, resin grouted, or fully encapsulated friction bolts) are installed into the rock mass, providing reinforcement and increasing the shear strength across discontinuities. They can be passive (grouted) or active (tensioned) and are designed to tie unstable blocks or layers back into the more stable rock mass behind the highwall face. Bolt length, diameter, and pattern are determined by the depth of potential failure planes and the required reinforcement loads. Rock Bolting: Steel bolts (e.g., mechanical, resin grouted, or fully encapsulated friction bolts) are installed into the rock mass, providing reinforcement and increasing the shear strength	

	across discontinuities. They can be passive (grouted) or active (tensioned) and are designed to tie unstable blocks or layers back into the more stable rock mass behind the highwall face. Bolt length, diameter, and pattern are determined by the depth of potential failure planes and the required reinforcement loads. Shotcreting: A layer of concrete (often fibre-reinforced) sprayed onto the rock face, providing immediate surface support, preventing ravelling and protecting the rock from weathering. It can be used in conjunction with mesh and bolts, especially in areas of poor rock mass quality or localized instability. Scaling: Regular, systematic removal of loose rock fragments from the highwall face using mechanical excavators or specialized scaling tools. This is a proactive measure to address immediate hazards and improve the overall stability of the highwall by removing potential rockfall sources. This should be performed from a safe distance or from a secure platform.	

	Berms and Catch Fences: Physical barriers constructed at the base of the highwall (on the access bench) to catch any falling debris. Berms (earthen structures) or purpose-built catch fences (e.g., wire rope barriers) can significantly reduce the risk of rockfalls reaching operating equipment or personnel. Their size and location are determined by the potential rockfall trajectory and energy. Optimized Slope Design: Geotechnical engineers will design highwall angles, inter ramp angles, and bench configurations based on detailed rock mass characterization, structural analysis (kinematic), and advanced numerical stability modelling (e.g., using finite element or finite difference methods). Designs will target an adequate factor of safety under both static and pseudo-static (seismic) conditions. Ground Support Implementation: Implement appropriate ground support measures as detailed (Wire-mesh draping, rock bolting, shotcreting) in unstable or potentially unstable highwall sections, and proactively in areas identified with adverse geological structures. Support systems will be designed to	

	integrate with Addcar highwall mining operation. Waste Dump Stability: Engineered Design: Design waste rock dumps and discard facilities as stable geo structures, considering shear strength of materials, foundation conditions, and seismic loading. Designs will specify appropriate batter angles, internal drainage systems, and phased construction. o Material Placement: Control material placement to achieve adequate compaction and avoid segregation that could lead to instability. o Internal Drainage: Incorporate internal drainage layers or systems within dumps to prevent waterlogging and reduce pore pressures, which can destabilize slopes. o Progressive Rehabilitation: Implement progressive shaping, topsoiling, and revegetation of completed sections of dumps to ensure long-term stability and erosion control. Progressive Rehabilitation: Implement progressive rehabilitation as mining progresses. This involves shaping, topsoiling, and revegetating disturbed areas (e.g., completed highwall sections, rehabilitated waste dumps, decommissioned roads) as soon as they become available. This	

	minimizes the exposed area at any given time, thereby reducing the window for erosion. Erosion Control Structures: Install appropriate temporary and permanent erosion control structures. These include: Berms and Diversion Drains: To divert clean stormwater away from disturbed areas and channel dirty water to pollution control dams. o Gabion Baskets and Reno Mattresses: For stabilizing steep slopes or drainage channels. o Silt Fences and Sediment Traps: To capture suspended solids in runoff before it enters natural watercourses. o Contouring and Terracing: Shaping disturbed land to reduce slope lengths and gradients, thereby decreasing runoff velocity and erosive power. o Compaction and Revegetation of Dumps: Compact and revegetate spoil dumps and waste rock facilities with appropriate indigenous vegetation and a suitable topsoil layer to stabilize surfaces, promote infiltration, and	

	prevent erosion. Hydroseeding and mulching can assist in rapid establishment of vegetation cover. o Dust Suppression: Implement effective dust suppression measures on haul roads (e.g., water bowsers, chemical dust suppressants), stockpiles (e.g., covers, water sprays), and other disturbed areas to prevent wind erosion of fine soil particles.	
Noise	-When night-time drilling activities will be required within 1,000m from NSR, the mine should use available material to develop a berm between the drilling area and the NSR, -Night-time construction traffic entering and leaving the mine should be minimized between the hours of 22:00 and 04:00; -The mine must implement a quarterly night-time noise monitoring programme at houses used for residential activities. It is recommended that an acoustic specialist be appointed to assist with the design of a noise monitoring programme, considering the mitigation measures implemented. Feedback from NSR should be used to refine, and potentially update mitigation measures (which may include the relocation of certain receptors); -All employees and contractors should receive Health and Safety induction that includes an environmental awareness component (noise). This is to allow employees and	X

	contractors to the potential noise risks that activities (especially nighttime activities) pose to the realise surrounding environment. The applicant must implement a line of communication (i.e., a helpline where complaints could be lodged). All potential sensitive receptors should be made aware of these contact numbers, or alternative means to communicate issues. The mine should maintain a commitment to the local community and respond to concerns in an expedient fashion. Sporadic and legitimate noise complaints could develop and if valid,should be investigated. Feedback must be provided to the affected stakeholder(s) with details of any steps taken to mitigate the impact (if valid complaint) or preventative steps to minimise this from happening again. -The mine must investigate any reasonable and valid noise complaint if registered by a receptor staying within 2,000 m from the plant or active mining area.	
Paleontological	Mitigation involves planning the protection of significant fossil sites, rock units or other palaeontological resources and/or excavation, recording and sampling of fossil heritage that might be lost during development, together with pertinent geological data. -Should further fossil material be discovered during the course of the development (e. g. during bedrock excavations), this must be safeguarded, where feasible in situ, and reported to a palaeontologist or to the Heritage Resources authority.	X
Socio-economic	-Ensure implementation of the Company Employment Policy.	X

	-Ensure that local communities understand the Project's procurement and employment requirements in terms of skills and type of contracts and employment. -Should Contractors be used during establishment, ensure that local employment targets are set regardless of the size of the work program. Local employment targets must include employment of youths and women from historically disadvantaged backgrounds. Upskill local contractors by pairing them with the big contractors for the transfer of skills. -Prioritise employment and training of people living within the primary study area over outsiders, especially for unskilled and semi-skilled positions. -Maximise local employment to minimise the need for housing of temporary workers which could lead to social problems of integration with the local community. -Establish a local recruitment committee to ensure a fair and transparent recruitment process.	

	-Widely advertise all Project employment opportunities in local community newspapers and place them in public places in local languages. -Where possible, the construction workforce must be for the operation of the mine. -Ensure that the mine's Community Liaison Officer is informed of all Project developments to facilitate ongoing and active engagement with stakeholders. Comply with minimum wage requirements for unskilled labour. -All employment opportunities must be advertised in predominantly spoken languages within the primary study area. -Accommodate those who do not have access to Android phones or the internet, and widely advertise employment opportunities using community newspapers notice boards, etc. -Ensure that no employment takes place at the entrance to the site (to avoid people congregating at the work site). Only formal channels for employment must be used -Establish SMME skills development as part of the mine commitments.	

	-Partner with relevant organisations where available and appropriate (e.g., government agencies, civil society, and NGOs) to provide access for local businesses to finance and advisory services to develop their capacity to competitively supply to the Project. -Implement a procedure for dissemination of procurement opportunities as early as possible, with clearly defined requirements for the goods or services to manage expectations. -Implement the grievance procedure. ` -Develop an In-Migration Plan that addresses how the Project will seek to minimise Project-induced in-migration as far as possible. Implement mitigation measures to address the adverse environmental and social consequences and maximise the benefits of in-migration. The management plan should be developed together with other industry role players and the government. -Establish a multi-stakeholder forum which will include the chief, izinduna, municipal leaders, community-based organisations, and Project developers to ensure inclusive decision-making and unified communication channels.	

	Design a community benefit-sharing plan that is not tied to specific leadership factions but instead supports broader social infrastructure (e.g., education, water, health services) to benefit the entire area.	
Visual and Landscape	Architectural Design : -Low-Profile Infrastructure: Design site structures (offices, storage units, control rooms) to have minimal vertical impact. Use single-storey, compact designs where possible to reduce visibility from surrounding viewpoints. -Non-Reflective Finishes: Use matte, nonreflective materials for all buildings and infrastructure to avoid glare and visual distraction. -Natural Colour Palette: Apply colours that match the surrounding natural environment (e.g., earth tones, muted greens and browns) to external finishes, ensuring structures blend into the background. -Screening and Cladding: Use visually permeable screens or wooden cladding around mechanical and utility structures to soften their appearance and reduce industrial visual cues. Landscape Design Measures: Vegetative Screening: Establish buffer zones of indigenous vegetation around the perimeter of the site and along access roads, especially near sensitive visual receptors such	X

	as residential areas and lodges. Fast-growing native trees and shrubs should be prioritised to provide effective screening within the shortest time. -Landform Utilisation: Make use of natural ridgelines and topographical depressions to shield high-impact areas such as highwall faces, stockpiles, and haul roads from public view. -Progressive Rehabilitation: Rehabilitate mined areas in phases rather than waiting until the end of operations. Early revegetation helps to quickly restore visual continuity and reduce the long-term visual footprint. -Contoured Shaping of Stockpiles and Highwall: Avoid steep, angular cuts and mounds. Instead, shape disturbed surfaces into more natural, undulating forms that mimic the surrounding landscape. Landscape Design Measures: Vegetative Screening: Establish buffer zones of indigenous vegetation around the perimeter of the site and along access roads, especially near sensitive visual receptors such as residential areas and lodges. Fast-growing native trees and shrubs should be prioritised to provide effective screening within the shortest time. -Landform Utilisation: Make use of natural ridgelines and topographical depressions to shield high-impact areas such as highwall faces, stockpiles, and haul roads from public view.	

	-Progressive Rehabilitation: Rehabilitate mined areas in phases rather than waiting until the end of operations. Early revegetation helps to quickly restore visual continuity and reduce the long-term visual footprint. -Contoured Shaping of Stockpiles and Highwall: Avoid steep, angular cuts and mounds. Instead, shape disturbed surfaces into more natural, undulating forms that mimic the surrounding landscape. Access Road Design -Road Alignment: Align internal access roads to follow natural contours where possible, avoiding straight lines that may be visually jarring in an otherwise organic landscape. Lighting Control Measures Directional Lighting: All external lighting will be downward-facing and shielded to prevent light spillage into the night sky and surrounding areas. -Low-Intensity LED Fixtures: Energy efficient, low-lumen LED lighting will be used to provide functional lighting while reducing glare and brightness. -Motion-Activated Security Lights: Where appropriate, motion sensors will be installed to ensure lights are only active when needed, reducing continuous illumination. -Avoidance of Over-Lighting: Lighting will be limited to operational zones and safety critical areas only, with no unnecessary decorative or floodlighting.	

	-Night Sky Compliance: Lighting design will comply with the principles of dark-sky friendly development to preserve the natural nocturnal character of the area.	
Terrestrial Biodiversity	-Use designated roads to access the site, as much as possible. Minimise the project footprint and reserve indigenous vegetation wherever possible. -Avoid disturbance of protected trees. Areas disturbed, cleared, and trampled during the mining phase must be rehabilitated immediately after completion. - All species of conservation concern must be avoided. - No animals should be trapped for any reasons whatsoever. - Preventative erosion control measures to be put in place.	X

Copies of Specialist Reports are attached as appendices.

14. Environmental impact statement

14.1. Summary of the key findings of the environmental impact statement

Table 14 Findings of the environmental impact statement.

Impacts	**Activity Phases**	**Significance**	
		Pre-mitigation	**Post-mitigation**
Flora and Fauna	Construction Operational Decommission	High	Moderate
Noise	Construction Operational Decommission	Moderate	Low
Visual	Construction Operational Decommission	High	Moderate
Air Quality/ Dust	Construction Operational Decommission	Moderate	Low
Soils and Land Capability	Construction Operational Decommission	High	Moderate
Surface Water	Construction Operational Decommission	Moderate	Low
Groundwater resources	Construction	High	Moderate

	Operational Decommission		
Health and Safety	Construction Operational Decommission	Moderate	Low
Socio-Economic	Construction Operational Decommission	Moderate	Low
Cultural and Heritage Resources	Construction Operational Decommission	High	Moderate
Traffic	Construction Operational Decommission	Moderate	Low
Waste	Construction Operational Decommission	Moderate	Low

14.2. Final Site Map

(Provide a map at an appropriate scale which superimposes the proposed overall activity and its associated structures and infrastructure on the environmental sensitivities of the preferred site indicating any areas that should be avoided, including buffers. Attach as Appendix)

Figure 19 Site plan map of the proposed mining right area.

14.3. Summary of the positive and negative implications and risks of the proposed activity and identified alternatives

PROPOSED ACTIVITY	ASPECTS
POSITIVE	
Construction Operational Decommission	The project will contract local skilled and unskilled individuals for short term opportunities. Those able to secure employment will also enjoy benefits associated with a steady income during that period.
	The project will require highly technical capital goods and services and procure some through contacts lasting several months to several years from local businesses.
NEGATIVE	
Construction Operational	Soil compaction and soil erosion due to the movement of heavy machinery on site. Soil contamination due to hydrocarbon

Decommission	spillages from the fuel storages and vehicles.
	The project is likely to give rise to an increase in population influx to the area in anticipation of or response to, economic opportunities associated with the development and /or operation of the project. The influx will likely result in increased demand for resources (water, electricity, housing, public transport, health services, etc) creating tension among locals and increase social pathologies.
	The construction will have health and safety risks.
	Potential to impact the eco-tourism sites and conservation zones.
	Potential to cause both physical and economic displacement, as households and individuals residing near the project site may face relocation or loss of access to land and natural resources that support their livelihoods, thereby disrupting social networks and economic stability.
	Noise nuisance due to moving vehicles and operating equipment.
	Dust creation during clearance placement of infrastructure.

14.4. Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr

(Bases on the assessment and where applicable the recommendations from specialist reports, the recording of the proposed impact management objectives, and the impact management outcomes for the development for inclusion in the EMPr as well as the inclusion as conditions of authorisation.)

The objectives of the EMPr will be to:

- Provide sufficient information to strategically plan the mining activities as to avoid unnecessary social and environmental impacts.
- Ensure that mining activities are conducted in a sustainable manner.
- Develop an approach that will ensure compliance with relevant legislations; and
- Provide a management plan that is effective and practical for implementation.
- Through the implementation of the proposed mitigation measures it is anticipated that the
- identified environmental impacts can be managed and mitigated effectively.
- Heritage/cultural resources can be managed by avoidance of known resources and though consultation with landowners/stakeholders.
- Noise generation can be managed through consultation and restriction of operating hours and by maintaining equipment and applying noise reduction equipment if necessary;
- Dust generation can be managed by limiting as far as possible the exposure of surfaces, application of dust suppression methods on exposed surfaces and use of water during mining activities;
- A Terrestrial Biodiversity impact assessment has been conducted to protect biodiversity and to ensure that impacts of protected and vulnerable species are prevented, and where impacts cannot altogether be prevented, they must be minimised and mitigated and/or managed.
- Manage as far as possible the soil, surface water and groundwater contamination due to hydrocarbons by conducting proper vehicle maintenance, refuelling with care to minimise the chance of spillages, placing the fuel storage tanks on bunded areas or impermeable structures and by having a spill kit available on each site where mining activities are in progress;
- Conduct an appropriate public consultation and conflict resolution during stakeholder consultation phases. All mining personnel will be made aware of the local conditions and sensitivities in the mining right area and local residents are always treated with respect and courtesy.

14.5. Final proposed alternatives

(Provide an explanation for the final layout of the infrastructure and activities on the overall site as shown on the final site map together with the reasons why they are the final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment.)

As the environmental studies formed the basis for the layout plan, it was already taken into account in the initial plan that the activities should be carried out in such a way that potential environmental impacts are avoided and minimised. Where impacts cannot be avoided, mitigation and management measures have been provided.

14.6. Aspects for inclusion as conditions of Authorisation.

(Any aspects which have not formed part of the EMPr that must be made of the Environmental Authorisation.)

It is the opinion of the EAP that the following conditions should form part of the authorisation:

I&APs should be engaged on a regular basis to address any complaints brought about the mining activities.

Maintain a minimum of 500m buffer from the Tugela River.

14.7. Description of any assumptions, uncertainties, and gaps in knowledge.

(Which related to the assessment and mitigation measures proposed.)

It is Vahlengwe Mining Advisory and Consulting (Pty) Ltd opinion that knowledge gaps or uncertainties exist regarding the investigations undertaken by the specialist studies as part of the Dunrose Mining Right and associated Environmental Authorisation Application.

14.8. Reasoned opinion as to whether the proposed activity should or should not be authorised.

14.8.1. Reasons why the activity should be authorized or not.

- The applicant is committed to conduct the mining activities in a sustainable manner and to comply with the prescribed environmental legislations in order to protect the environment and manage as far as possible the impacts associated with the project. Therefore, the applicant will ensure that:
- The mining program will be developed in a phased manner commencing with non-invasive activities to bring refinement to understanding of the geological variance;
- The environmental impacts associated with the mining activities are deemed to be minimal provided that the proposed mitigation is implemented;
- In the event that the success exceeds expectations/assumptions, the financial guarantee will be reviewed annually and variation in the planned work programme will be revised in line with Section 102 of the MPRDA;
- With appropriate care and consideration, the impacts resulting from the mining activities can be suitably avoided, minimised, or mitigated;
- With implementing the appropriate rehabilitation activities, the impacts associated with the mining activities can be reversed.

14.8.2. Conditions that must be included in the authorisation

- The following conditions could form part of the authorisation:
- Maintain a buffer of 100m from a water course;
- Maintain a 50m (preferably 100m) buffer from any infrastructure or dwelling;

- Maintain at least 1km buffer from a National Park;
- The applicant must ensure that fluids are stored and handled properly in a concrete or cement lined surface with berm walls to avoid any seepage into the groundwater resources and ensure that the design of the storage area is such that any leakages or spillages can be contained.
- Implement the impact management and monitoring measure as set out in the EMPr together with the monitoring to measure the effectiveness of the EMPr; and
- Landowners and land occupiers should be engaged prior to any site activities being undertaken once the infrastructure site have been determined.

14.9. Period for which the Environmental Authorisation is required.

The authorisation is required for the duration of the mining right which is 30 years.

14.10. Undertaking

(Confirm that the undertaking required to meet the requirements of this section is provided at the end of the EMPr and is applicable to both the BAR and EMPr.)

The undertaking is provided at the end of the EMPr.

14.11. Financial Provision

(State the amount that is required to both manage and rehabilitate the environment in respect of rehabilitation)

A financial provision of approximately R716 004.00 has been budgeted for the mining programme, for rehabilitation activities.

14.11.1. Explain how the aforesaid amount was derived.

i) Confirm that this amount can be provided for from operating expenditure.

(Confirm that the amount, is anticipated to be an operating cost and is provided for as such in the Mining Work Programme, Financial and Technical Competence Report or Prospecting Work Programme as the case may be.)

The financial provision calculations were undertaken in terms of the guidelines provided within the 'DMR Guideline Document for The Evaluation of The Quantum of Closure-Related Financial Provision Provided by a Mine' (DMR, 2005). The closure components for the mining activities are summarised on the table below:

Table 15 Closure components for mining activities.

Components	Extent	Description
1.Dismantling of processing plant and related structures	0 m3	No processing plant will be constructed on

		site.
2(A). Demolition of steel buildings and structures	0 m2	There will be no steel structures.
2(B). Demolition of reinforced concrete buildings and structures	0 m2	Only mobile offices and ablutions will be put on site and removed upon closure of the project.
3. Rehabilitation of access roads	150 m2	There are temporary access roads that will require rehabilitation.
4(A). Demolition and rehabilitation of electrified railway lines	0 m	There are no electrified railway lines on site.
4(B). Demolition and rehabilitation of non electrified railway lines	0 m	There are no non-electrified railway lines.
5. Demolition of housing and/or administration facilities	0 m2	There is no housing that will require demolition.
6. Opencast rehabilitation including final voids and ramps	0 m	There are no voids and ramps.

7. Sealing of shafts, adits, and inclines	0 m2	There are no shafts, adits nor inclines on site.
8(A). Rehabilitation of overburden and spoils	0 ha	The spoils will be used to backfill the open areas where mining took place.
8(B). Rehabilitation of processing waste deposits and evaporation ponds (non polluting potential)	0 ha	There will be no processing waste deposits and evaporation ponds.
8(C). Rehabilitation of processing waste deposits and evaporation ponds	0 ha	There will be a PCD created, but the applicant needs a WUL first from DWS.
9. Rehabilitation of subsided areas	0 ha	The mining activities are not associated with subsidence.
10. General surface rehabilitation	5 000 ha	The area that will require rehabilitation will include infrastructure, highwall mining area, access roads.
11. River diversions	0 ha	The mining right area is not associated with river diversions.

12.Fencing	150 m	The mining area will be fenced to keep cows, goats as well as wild species, off the highwall mining bench.
13. Water management	0 ha	Water will need to be managed.
14. 2 to 3 years of maintenance and aftercare	0 ha	All disturbances will be subjected to rehabilitation.

15. Deviations from the approved Scoping Report and Plan of Study.

15.1. Deviations from the methodology used in determining the significance of potential environmental impacts and risks.

(Provide a list of activities in respect of which the approved scoping report was deviated from, the reference in this report identifying where the deviation was made, and a brief description of the extent of the deviation.)

This submission to the DMPR for Dunrose Investment 174 (Pty) Ltd's Mining Right Application is being undertaken in terms of Section 22 of the MPRDA and NEMA, EIA Regulations GN 982, as amended. On 04 March 2025, DMPR , as the Competent Authority, accepted a Scoping Report compiled in accordance with NEMA for the Listed Activities. However, the study plan and methodology adopted in this EIA report do not deviate from the DMPR -accepted Scoping Report.

15.2. Motivation for the deviation.

No deviations were undertaken from the approved Scoping Report from the DMR.

16. Other information required by the Competent Authority

Compliance with the provisions of the sections 24(4)(a) and (b) read with section 24(3)(a) and (7) of the National Environmental Management Act (Act 107 of 1998).

16.1. Impact on the socio-economic conditions of any directly affected person.

(Provide the results of investigation, assessment, and evaluation of the impact of mining, bulk sampling or alluvial diamond prospecting on any directly affected person including the landowner, lawful occupier, or, where applicable, potential beneficiaries of any land restitution claim, attach the investigation report as Appendix 2.19.1 and confirm that the applicable mitigation is reflected in 2.5.3, 2.11.6 and 2.12. herein)

An extensive consultation process with I&APs was undertaken during the scoping phase of the application The purpose of the consultation is to provide affected persons the opportunity to raise any concerns they may have. The comments, concerns and suggestions received will be recorded in the Comments and Response Report (CRR). The CRR will be included in the final EIR to be submitted to DMPRE for decision making.

16.2. Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act.

(Provide the results of investigation, assessment, and evaluation of the impacts of mining, bulk sampling or alluvial diamond prospecting on any national estate referred to in section 3(2) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) with the exception of the national estate contemplated in section 3(2)(i)(vi) of that Act, attach the investigation report as Appendix and confirm that the applicable mitigation is reflected in 2.5.3)

According to A Pelser the site contains at least 13 metal smelting/ forging furnaces found in 6 different locations spread across the area, while large numbers of anvils, hammer stones and smaller stone tools associated with metal working were also found. At least one hut floor was also recorded, as well as scatters of pottery metal artifacts, glass beads and animal bones. The site seems to have been an extensive metal working complex, with possibility of more sites such as these existing in the area.

The impact of the proposed development on cultural heritage sites in the area is deemed as High based on the Impact Assessment criteria used. However, there is always a possibility of sites, features and material being missed as a result of various factors such as vegetation cover hampering visibility on the ground, as well as the often-subterranean nature of cultural heritage resources (including low stone-packed or unmarked graves). These factors need to be taken into consideration, and it is therefore recommended that a Chance Finds Protocol (CFP) also be drafted and implemented for any future mining-related activities that will result from the granting of the Mining Rights Application to the Applicants.

17. Other matters required in terms of section 24(4)(a) and (b) of the Act

(The EAP managing the application must provide the Competent Authority with detailed, written proof of an investigation as required by section 24(4)(b)(i) of the Act and motivation if no reasonable of feasible alternatives, as contemplated in sub-regulation 22(2)(h) exist. The EAP must attach such motivation as Appendix)

The mentioned sections of the Act deals with an application for the renewal of a Mining Right. The Colenso Coal project is not a renewal of a Mining Right but a new application.

PART B

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

18. Environmental Management Programme Introduction.

18.1. Details of the EAP

(Confirm that the requirement for the provision of the details and expertise of the EAP are already included in PART A, section 1(a) herein as required.)

This has already been coved in Part A of this document.

18.2. Description of the Aspects of the Activity.

(Confirm that the requirement to describe the aspects of the activity that are covered by the draft Environmental Management Programme is already included in PART A, section (1)(h) herein as required.)

This has already been coved in Part A of this document.

18.3. Composite Map

(Provide a map (Attach as an Appendix) at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environment sensitivities of the preferred site, indicating any areas that any areas should be avoided, including buffers.)

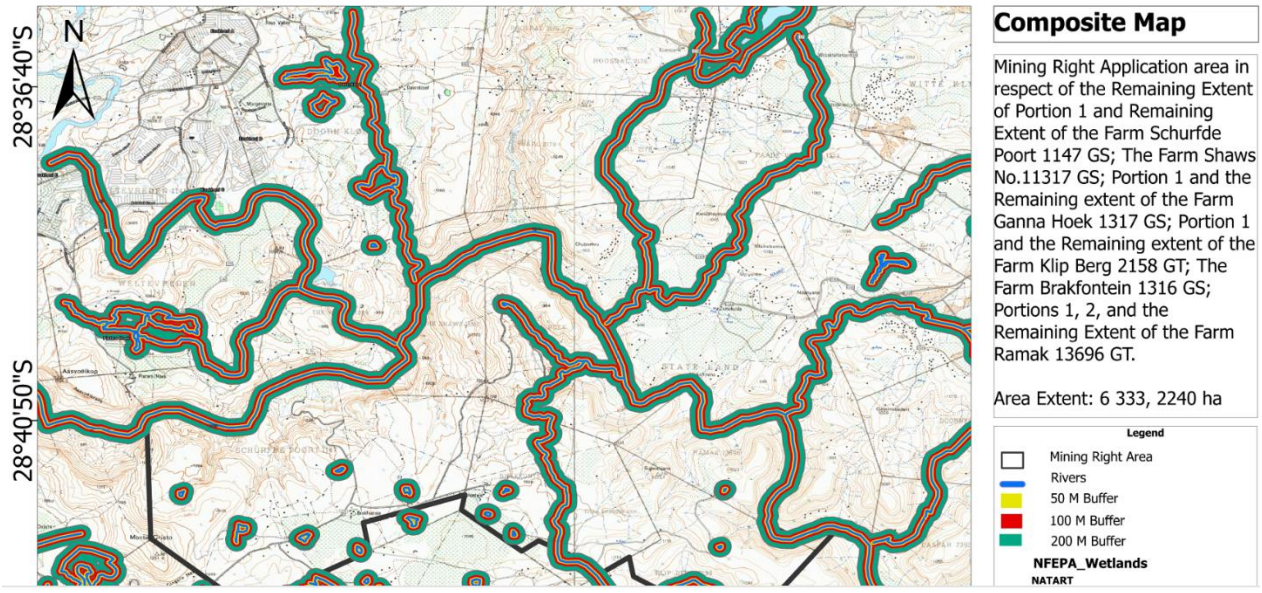


Figure 20 Composite map of the proposed mining right area.

19. Description of impact management objectives including management statements.

19.1. Determination of closure objectives

(Ensure that the closure objectives are informed by the type of environment described in 2.4 herein.)

The vision, and consequent objectives and targets for rehabilitation, decommissioning, and closure, are intended to reflect the local environmental and socio-economic context of the project, as well as to reflect both the corporate requirements, as well as stakeholder expectations.

The receiving environment within which the mining activities will be undertaken include the following key land-uses:

- Agriculture
- Human Settlements
- Livestock grazing
- Tourism
- Emaweni Ranch
- Zingela Safari

In practise, the post-closure land use has been determined by the pre-mining land use applicable to the precise area of the invasive mining activities. Given that the exact locations of the intended mining activities have been identified and assessed, it can be said that the closure plan will sufficiently address the objectives for the preferred alternative.

This EMPr, on the other hand, aims to address the key closure objectives, which are likely to remain consistent over most mining activities.

The Rehabilitation plan shall outline the closure objectives, which are focused at restoring the landform, land use, and vegetation units to their pre-mining state, unless the landowner requests a specified, justifiable replacement land use. As a result, the disturbed mining areas planned end land use and closure objectives will be specified in consultation with the relevant landowner. Evidence of such consultation will be given with an application for a Closure Certificate. The overall goal of the rehabilitation plan is to rehabilitate the area to as close as its pre-mining condition as possible. This will be accomplished through a series of established objectives:

- Ensuring that the area is safe for people and animals. This entails closing the opencasts and shafts and rehabilitating any areas that may pose a safety hazard;
- Recreating a free draining landform which entails earthworks infilling, reshaping, and levelling of all the disturbed landscape;
- Re-vegetation which involves either reseeding or allowing natural succession depending on the type of vegetation in the area, climate, and the landscape class and;
- Verification of rehabilitation success, which involves monitoring of rehabilitation and ensuring that area is eligible for closure.

19.2. The process for managing any environmental damage, pollution, pumping and treatment of extraneous water or ecological degradation as a result of undertaking a listed activity.

An Environmental Response Plan (ERP) is a comprehensive document that outlines the procedures and strategies to be implemented in the event of an environmental incident or emergency situations that may arise at Colenso Coal operation. The primary goal of an ERP is to minimize the impact of such incidents on the environment, human health, and safety.

Environmental Response Plan has the following objectives:

- To categorize emergency situations by identifying hazards and establishing procedures for responding to these situations;
- Assign responsibilities for responding to emergency situations;
- Establishing an effective system for receiving, recording, and forwarding reports of environmental incidents and emergencies; and
- Ensure that all environmental incidents or emergencies are investigated and that the necessary procedures are put in place to implement corrective and preventive actions to prevent recurrence.

Dunrose's emergency preparedness and response code of practice must be compiled in accordance with the following:

- ISO 9001:2000;
- ISO 14001;
- Occupational Health and Safety (OHSAS) 18001;
- The Mine Health and Safety Act, 1996 (Act No. 29 of 1996); and
- The Mineral Act, 1991 (Act No. 50 of 1991).

In the event of an emergency, the ERP and relevant procedures will be reviewed, and the necessary action taken. Copies of the Emergency Response Plan will be placed in accessible and visible locations on the site, such as the site office, to assist in the effective implementation of procedures.

Dunrose must ensure that employees and contractors are adequately trained regarding the implementation of the EMPr, environmental legal requirements and obligations, and the ERP. Environmental awareness applies to all project personnel who must be trained so that they

are aware of their environmental responsibilities before entering the site. An Environmental Control Officer (ECO) will be appointed to conduct training during the operational phase of the project as well during the decommissioning and rehabilitation phase. This will be to ensure that the site has been returned to its original or acceptable form, and that the ERP is being employed adequately in the event of an emergency. As a result, training programmes and periodic emergency simulations are recommended to ensure that all people understand safety and emergency procedures.

Personnel who fail to comply or disregard training and instruction should be penalised based on their offence. Depending on the gravity of the offence, first-time offenders may just receive a written warning. Second-time offenders may face suspension or fines, based on the discretion of the site manager, who may consult with the ECO.

19.3. Potential risk of Acid Mine Drainage.

(Indicate whether the mining can result in Acid Mine Drainage.)

The coal mining may generate Acid Mine Drainage, but the Colenso Coal will not be crushing or processing coal on site, so the impact is low. The proposed mitigation measures will be implemented throughout the Life of a Mine.

19.4. Steps taken to investigate, assess, and evaluate the impact of Acid Mine Drainage.

Engineering or mine design solutions to be implemented to avoid or remedy Acid Mine Drainage.

19.5. Measures that will be put in place to remedy any residual or cumulative impact that may result from Acid Mine Drainage.

To remedy residual or cumulative impacts from AMD the applicant must consider the following measures:

- Treatment systems: implement active or passive treatment systems such as chemical precipitation, bioremediation or constructed wetlands to remove contaminants and neutralize acidity.
- Water management: Implement effective water management strategies including diversion, containment and treatment of AMD.
- Buffer Zones: establish buffer zones or riparian zones to protect aquatic ecosystems and prevent AMD from entering water bodies.
- Rehabilitation and restoration: Rehabilitate and restore affected ecosystems, including revegetation and reintroduction of native species.

19.6. Volumes and rate of water use required for the mining, trenching or bulk sampling operation.

It is projected that approximately a certain amount of litres of water per day will be required for the operation. The water will either be sourced from the municipality and transported to the site or extracted from groundwater.

The feasibility of groundwater extraction will be verified in consultation with the Department of Water and Sanitation. Should groundwater extraction be required a Section 21 (a) water use license will be required.

19.7. Has a water use license has been applied for?

The proposed mining project requires a WULA in terms of Section 21 of the National Water Act (Act 36 of 1998). All water management infrastructure will be designed to withstand a 24-hour rainfall event that occurs once every 1 000 years. A WULA has been compiled and submitted to DWS as the decision-making authority in accordance with Section 21 of the NWA. The process has assessed the potential impacts of mining activities on water resources.

19.8. Impacts to be mitigated in their respective phases

Measures to rehabilitate the environment affected by the undertaking of any listed activity.

Table 16 Mitigation measures to address the impacts caused by mining activities.

ACTIVITIES	**PHASE of operation in which activity will take place.** **State: Planning and design, Pre-Construction, Construction, Operational, Rehabilitation, Closure, Post Closure**	**SIZE AND SCALE** **(Volumes, tonnages and hectares or m2)**	**MITIGATION MEASURES** **(Describe how each of the recommendations in herein will remedy the cause of pollution or degradation and mitigation of pollutants)**	**COMPLIANCE WITH STANDARDS** **(A description of how each of the recommendations herein will comply with any prescribed environmental management standards or practices that have been identified by Competent Authorities.)**	**TIME PERIOD FOR IMPLEMENTATION** **(Describe the time period when the measures in the environmental management programme must be implemented. Measures must be implemented when required. With regard to Rehabilitation specifically this must take place at the earliest opportunity. With regard to Rehabilitation, therefore state either-** **Upon cessation of mining, bulk sampling or alluvial diamond prospecting as the case may be.**
Site clearance	Construction Operational	50 ha, short term and	□ Minimize clearance of	NEMA MPRDA	Throughout mining.

		localized	vegetation as much possible. In instances where it is possible, cut vegetation instead of clearing to minimize soil disturbance. □ Any larger fauna species discovered prior to and during vegetation	NEMBA NEMAQA Dust regulations NWA	

			clearance should be given the opportunity to relocate away from the machinery that will be used for construction and operational activities. Sensitive areas should be demarcated and treated as No-Go areas. Methods for minimizing potential		

			harm to fauna species should be used during vegetation clearance. To maximize the potential for mobile species to move to adjacent areas, clearing must be gradual and slow, beginning from the interior of the site and continuing outwards towards the boundary.		

			Utilize local labour if possible. Implement alien Vegetation management. Implementing mitigation measure to prevent and manage hydrocarbon spills. Conducting water quality and quantity monitoring.		
Site access	Construction Operational	Short term and localized	When on site, the Applicant and/or	NEMA OHS and MHSA	Throughout mining

			contractors must take into consideration not to interfere with current land uses and practices. All site employees and visitors must be taken through a site induction, which includes basic environmental awareness as well as site-specific environmental requirements such as		

			site sensitivities and appropriate protocols/procedures. Wherever possible, the Contractor's Environmental Officer should present or facilitate this induction.		
Establishment of site infrastructure	Operational	2 ha	Vehicles and machinery must use existing access routes as far as possible to prevent unnecessary construction of new		

			routes. Ensure proper and adequate drainage. Dust suppression should be undertaken when required to reduce the usage of water. Dust suppression strategies should be in accordance with applicable standards for PM10		

			and PM 2.5. Ensure that mining is in accordance with occupational health and safety regulations. Contractors working on the project should have spill kits available to ensure that any fuel or oil spills are cleaned up and disposed of properly.		
Storage of hazardous substances	Construction Operational	Long term and localized	To prevent pollution of the environment or harm to humans or	NWA NEMWA NEMA	Throughout mining.

			animals, all hazardous substances such as fuel, grease, oil, brake fluid, hydraulic fluid must be handled, stored, and disposed of in a safe and responsible manner. Appropriate spillage prevention measures must be implemented. If there are any major spills of hazardous materials, they must		

			be reported in accordance with Section 30 of the NEMA. All chemicals and toxicants used in the construction must be stored away from sensitive areas and in a bunded area. The applicant must ensure that fluids are stored and handled properly in a concrete or cement lined surface with		

			berm walls to avoid any seepage into the groundwater resources and ensure that the design of the storage area is such that any leakages or spillages can be contained.		
Waste management	Construction Operational	Medium term and localised	Waste generated on site must be classified and separated using the color Throughout mining. coding method. Waste management	NEMWA	Throughout mining.

			must be prioritized, and all waste must be properly collected and disposed of. Recyclable waste must not be stored on site for extended periods to prevent risk of environmental pollution. To prevent rodents and pests from entering the site, it is		

			recommended that all waste be removed on a weekly basis. A Waste Management System must be put in place, with adequate waste storage in a form of covered containers, waste separation for recycling, and frequent removal of non-recyclable waste for permanent disposal at an appropriately		

			licensed waste disposal facility. On site waste disposal will be prohibited.		
Waste removal	Decommission	Short term and localised	Excess or waste material or chemicals must be removed from the site and, if possible, recycled (for example, oil and other hydrocarbon waste products). Any waste materials or chemicals that cannot be recycled must be disposed of at a waste facility that is	NEMWA	Operational Decommission

			properly licensed.		
Surface Infrastructure removal	Decommission	Short term and localised	All infrastructure, equipment, and other items erected during mining activities shall be removed from the site. Soil compaction should be avoided as much as possible. Heavy machinery used must be prohibited in areas outside of proposed mining site to reduce soil compaction.	MPRDA Rehabilitation Plan	Decommission

Rehabilitation	Rehabilitation	All disturbed areas	Clearing of vegetation should be minimized and avoided where possible. All structure footprints to be rehabilitated and landscaped concurrently as the mining activities progress is complete. Topsoil must also be utilised, and any disturbed area must	NEMA OHS and MHSA MPRDA Rehab Plan	Decommission

			be re-vegetated with plant and grass species which are endemic to this vegetation type. Progressive rehabilitation will enable topsoil to be returned more rapidly, thus ensuring more recruitment from the existing seedbank. Any woody material		

			removed can be shredded and used in conjunction with the topsoil to augment soil moisture and prevent further erosion.		
Consultation	Planning Construction Operation	Medium term, localised	Stakeholder engagement will continue throughout the mining process to ensure that the community and landowners are kept informed and could	NEMA	Throughout Planning, construction and operation

			address their concerns.		

19.9. Impact Management Actions and Outcomes

(A description of impact management outcomes, identifying the standard of impact management required for the aspects contemplated in paragraph)

ACTIVITY **Whether listed or not listed.**	**POTENTIAL IMPACT**	**ASPECTS AFFECTED**	**PHASE in which impact is anticipated.**	**MITIGATION TYPE**	**STANDARD TO BE ACHIEVED**
Site Clearance	Deterioration and damage to existing access roads and tracks Dust generation Clearance of	Topography Soil Air Quality Surface Water Groundwater Transportation Visual receptor Heritage	Construction Operation	Avoid and control through implementation of EMPr mitigation measures such as speed limit enforcement and vehicle maintenance	NEMA NEMBA CARA Threatened or Protected Species (TOPS) regulations NEMAQA Dust regulations NWA

	vegetation Invasion by alien species Soil erosion and compaction Impact on Flora and Fauna Impact on heritage resources	resources			NHRA

Storage of construction vehicles	Soil compaction Contamination of surface and ground water Spillage of oils, fuels, and chemicals Soil contamination or pollution	Surface water Groundwater Soils	Construction Operation	Avoid through implementation of EMPr mitigation measures such as communication with landowners. Control through implementation of ESMS.	NWA DWAF best Practice Guidelines NEMA
Storage of hazardous substances	Spillage of oils, fuels, and chemicals	Surface water Groundwater Soil Pollution	Construction Operation	Avoid through implementation of EMP mitigation measures	NEMA NEMBA NWA
Waste management	Generation and disposal of	Pollution	Construction Operation	Avoid through implementation of EMPr mitigation measures.	NEMA NEMWA

	waste				
Rehabilitation	Erosion Loss of habitat Disturbance to wildlife and communities in close vicinity	Topography Land use Soil disturbance Ecology	Rehabilitation	Control through Implementation of EMPR mitigation measures.	MPRDA in accordance with Rehabilitation plan.
Monitoring of rehabilitated sites	Erosion Disturbance to flora and fauna.	Topography Land use Soil disturbance Ecology	Post-closure	Control through adhering to monitoring requirements	MPRDA and regulations

20. Financial Provision

20.1. Determination of the amount of Financial Provision.

20.1.1. Describe the closure objectives and the extent to which they have been aligned to the baseline environment described under Regulation 22 (2)(d) as described in 2.4 herein.

The general goals of the mining closure include securing beneficial and widely agreed-upon post mining land uses. Removal of all generated wastes constructed infrastructure, and materials, re vegetation of disturbed and cleared areas, rehabilitation of access roads to ensure the growth of existing grasses and plant species, and clean-up of hydrocarbon spillages should all form part of the closure plan. The following are the primary closure objectives:

- All existing structures and facilities are physically stable, capable of withstanding foreseeable environmental conditions and events, pose no threat to health and safety, and perform their intended long-term functions.
- Contaminants must not be released or transported from the site at levels that are hazardous to human health or biota, or that are otherwise unacceptable.
- The biological environment is restored to a natural, balanced, self-sustaining ecosystem that is compatible with the planned post-mining land use. Other closure measures must create physical, chemical, and hydrological conditions that allow for such long-term ecosystems.
- Ensure that the site has been made visually appealing.
- Closure of the mining activities must ensure the quantity and quality of the site's natural resources.
- Maximize the desired post-mining land use.
- Mechanisms for post-closure monitoring are in place for the outstanding liability and risks.

20.1.2. Confirm specifically that the environmental objectives in relation to closure have been consulted with landowner and interested and affected parties.

A draft EIR/EMPr report was subjected to a public consultation process and all documents will be made available to the landowners and the I&APs.

20.1.3. Provide a rehabilitation plan that describes and shows the scale and arial extent of the main mining activities, including the anticipated mining area at the time of closure.

The management programme is created in such a manner that concurrent rehabilitation is attainable. Following the completion of planned invasive activities, Dunrose will ensure that the site is returned to its former state by carrying out the following measures:

- Decommissioning of all infrastructures that were used on site during the mining activities.
- The highwall area will be inspected for any signs of hydrocarbon spillages. Any identified soil which has been polluted as a result of the mining activities will be remedied and waste disposed of in a registered landfill site.
- Ensure that no waste material (plastics, papers, pipes) is left behind on the mining site.

20.1.4. Explain why it can be confirmed that the rehabilitation plan is compatible with the closure objectives.

The rehabilitation Plan is compatible with the closure objectives in that it will ensure that all disturbed sites are rehabilitated to restore the pre-mining environment to prevent risk to public and animal health and safety, contain and manage pollution, and ensure stability (environmental and geophysical); ensuring that the physical and chemical stability of the rehabilitated sites is such that the risk to the environment is not increased by naturally occurring forces to the extent that such increased risk cannot be managed by the measures taken to control these risks, ensuring that the mining operations are not abandoned but closed in accordance with the relevant regulations.

20.1.5. Calculate and state the quantum of financial provision required to manage and rehabilitate the environment in accordance with the applicable guideline.

A financial provision of approximately R 716 004.00 has been budgeted for the mining programme over 30 years, for rehabilitation activities. The financial provision calculations were undertaken in terms of the guidelines provided within the “DMR Guideline Document for The Evaluation of The Quantum of Closure-Related Financial Provision Provided by a Mine” (DMR, 2005).

20.1.6. Confirm that the financial provision will be provided as determined.

Should Mining Right be granted, Dunrose Investments 174 (Pty) Ltd will make provision for the estimated closure cost by means of a Bank Guarantee or any other means available and accepted by the Competent Authority.

21. Mechanisms for monitoring compliance with and performance assessment against the environmental management programme and reporting thereon, including

21.1. Monitoring of Impact Management Actions.

21.2. Monitoring and reporting frequency.

21.3. Responsible persons.

21.4. Time period for implementing impact management actions.

21.5. Mechanism for monitoring compliance.

Table 17 Monitoring compliance

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITY (FOR THE EXECUTION OF THE MONITORING PROGRAMMES)	MONITORING AND REPORTING FREQUENCY AND TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS.
Desktop studies and acquisition of historic data	None	None	None	None
Geological field mapping	None	None	None	None
Remote sensing and Geophysical Surveys	None	None	None	None
Site	Flora and Fauna	Document Control	Contractors Environmental	Once-off control of documents, site

establishment - Vegetation clearance -Alien vegetation removal -Vehicle and equipment movement - Placing of infrastructure	• Impacts on soils and land capability. • Groundwater quality degradation • Noise and dust generation • Visual and topography disturbance	• Site Inspections and checklists • Report review and Development of actions plans	Representative • Environmental specialist, ECO • Senior Environmental Management Officer	visit and reporting • Monthly site visits • Monthly Reports Annual Performance Assessment
Target Highwall Areas	Alien vegetation management • Noise nuisance • Air quality due to dust generation • Surface and groundwater management	Site Inspections and checklists • Report review and development of corrective action plans • Inspection of surface water features	Contractors Environmental Representative • Environmental specialist • ECO •Senior Environmental Management • Geohydrologist (if required)	Once-off control of documents site visit and reporting • Monthly site visits • Monthly Reports Annual Performance • Prior to invasive mining activities and monitoring post-mining.

	Heritage resources	• Survey of groundwater users and use within 5km of the invasive mining sites.		
Access Route (Existing roads to be utilised)	Dust generation	Site Inspections and checklists	Contractors • Environmental Representative	Monthly inspections and checklists

22. Indicate the frequency of the submission of the performance assessment report.

After the authorization is granted, an annual environmental performance audit report will be completed by alternating between internal and independent Environmental Assessment Practitioners (EAP). The holder of the authorization must ensure compliance with all the conditions of the EA and/or the EMPr, and the proposed activities must be audited against these conditions. It is also recommended that an independent EAP conduct an annual environmental performance assessment/audit, which will then be submitted to the competent authority. This audit report must meet the following requirements:

Be prepared by an independent person with the relevant environmental auditing expertise;

❖ Provide verifiable findings, in a structured and systematic manner, on-

(i) the level of performance against and compliance of an organization or project with the provisions of the requisite environmental authorisation or EMPr and, where applicable, the closure plan; and

(ii) the ability of the measures contained in the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity;

Contain the information set out in Appendix 7 of GN R. 326; and

❖ Be conducted and submitted to the competent authority at intervals as indicated in the environmental authorisation.

The purpose of this audit report is defined in the NEMA Regulations and is as follows:

- Determine the ability of the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
- Determine the level of compliance with the provisions of environmental authorisation, EMPr and where applicable the closure plan.

23. Environmental Awareness Plan

General environmental awareness must be promoted among the working personnel on the proposed project to encourage the implementation of environmentally sound practices throughout the duration of the project. This is to ensure that environmental, health and safety incidents are minimized, and environmental compliance is maximized. The purpose of an Environmental Awareness Plan used to inform the employees and outline the measures to be used to address any environmental risks related to their work and the way these risks must be dealt with in order to avoid contamination or the degradation of the environment.

The environmental awareness plan should at least communicate the following:

- Importance of compliance with the environmental policy, procedures, and other regulatory requirements;
- The significant environmental impacts and risks of an individual's work activities and the environmental benefits of improved performance;
- Individual's roles and responsibilities in achieving the aims and objectives of the environmental policy; and
- The potential consequences of not complying with environmental procedures.

Workshops

A workshop will be conducted to inform all management of the risks associated with the project. The risks for all aspects will be explained and the appropriate management options discussed. The workshop will also elaborate on the monitoring programmes that will be implemented to identify and monitor the level of impact on the environment and discuss various remediation actions. The evaluation process is integral in the assurance that the site reduces any possible environmental risks associated with the project. The workshop will be conducted prior to the commencement of each project phase to ensure that all risks are discussed before there is any chance of the impacts occurring. The workshop may be repeated at certain stages during the operation phase, in the case of new employees.

23.1. Manner in which the applicant intends to inform his or her employees of any environmental risk which may result from their work.

This workshop will seek to explain the following;

- How each action of the project phase may impact on the environment;
- Ensure that the working personnel understand the management strategies and keeping the environment risks to a minimum;
- Data collection reporting regarding each aspect will also be explained to ensure that each aspect is monitored; and
- This workshop will take place before the commencement of each phase of the project, thus ensuring a full understanding of the project and its associated environmental risks before any project activity is undertaken.

Communication Plan

Internal Communication

Communication strategies need to be established for the internal communication between the various levels and functions of the organisation, and receiving, documenting, and responding to environmental risks for each phase of the project will take place for the management, administrative and worker sectors of the site, as well as contractors.

- External Communication Strategies

The organisation shall conduct processes for external communication on its significant environmental aspects. Communication from external interested and affected parties may be received by email, fax, telephonically or by mail. Where required, a written response will be sent, on receiving such communication, by the appropriately appointed individual under signature of the Site Manager, to the respective interested and / or affected party. All telephonic or facsimile correspondence received on the site must be forwarded to the relevant department for action. All events or concerns will be captured and actioned on an existing and / or future database. The following communication channels can be used to communicate environmental issues to the external parties:

- E-mail: E-mail communication received must be stored, with replies, in an appropriate folder on a server. E-mail messages, relevant to environmental management, should be kept for a minimum of two years before deletion.
- Mail: Correspondence received by mail must be filed, along with the response
- Impact Assessments will be available on request from an external party by the Site Manager.

- Queries from Interested and Affected Parties: Response to queries about environmental impacts and aspects will be addressed by the relevant department and approved by the Site Manager.

Evaluation of the Environmental Awareness Plan

The evaluation will entail the auditing of the project activities in both the operation and rehabilitation.

This will be to assess the effectivity of the environmental awareness and training plan and if it is sufficient to make all those involved in the project aware of those risks that may occur as well as the necessary mitigation required to minimize these risks.

- Emergency Incident Reporting

Environmental incident reporting is an essential component of communication on the Project.

Employees are obligated to report any environmental problems, incidents, or pollution so that the appropriate litigator action can be taken as soon as possible. If an Environmental Incident occurs, it must be reported in accordance with the Incident Reporting Procedure. A plan for emergency preparedness and response must be developed.

- Induction

All employees and contractors must attend an induction program. Employees are inducted. Any contractor working on the project must complete Environmental Health and Safety induction training.

Environmental concerns and project-related issues will be addressed during the induction sessions.

Employees will be informed about all environmental implications and aspects, as well as mitigation actions. The induction workshops will be tailored to the level of employees attending, ensuring that all staff have a thorough understanding of environmental issues and pollution.

- On the Job Training

On-the-job education is an important aspect of environmental awareness. Employees will be educated about the expected environmental problems and concerns specific to their occupation. Employees will be trained on how to respond in the event of an environmental problem or source of pollution. The training should be an ongoing process.

- Hazardous Substances

Individuals dealing with potentially hazardous situations and risks that could result in hazardous spills, pollution incidents, excessive dust, or other forms of environmental damage should receive job specific training on the risks and potential consequences of their appointment and work situation, as well as how to avoid environmental impacts and respond during an environmental incident or emergency.

- ❖ Dust mitigation

Individuals dealing with potential situations and risks that could result in excessive dust should receive appropriate job-specific training on the risks and potential consequences of their appointment and work situation, as well as how to avoid environmental impacts and respond during an environmental incident or emergency.

- ❖ Fire Incidents

Individuals dealing with potentially hazardous situations and risks that could result in fire incidents or emergencies should receive adequate job-specific training on the risks and potential consequences of their appointment and work situation, as well as how to avoid environmental impacts and respond during an environmental incident or emergency.

- ❖ Pollution Incidents or Forms of Environmental Damage

Any incident or form of environmental degradation must be managed according to the Incident management procedure. Individuals dealing with potential situations and risks that could result in pollution incidents or other forms of environmental damage should receive job-specific training on the risks and potential consequences of their position and work situation, how to avoid environmental impacts, and how to respond during an environmental incident or emergency.

- ❖ Waste Management

Site personnel and contractors responsible for the operation and safe handling of the various waste streams will receive appropriate job-specific training on the risks and potential consequences of their appointment and work situation, how to avoid environmental impacts and how to respond during an environmental incident or emergency. Dunrose must ensure that training and awareness programmes cover the safe transportation, handling, storage, transfer, use and disposal of all waste streams, and the location of waste receptacles for each waste stream. All waste management activities must be done in accordance with the Dunrose procedures and in terms of registers dealing with storage of waste in specific areas. Staff awareness training programme will accommodate training, on which bin to use for organic waste and on sealing the lid on the bin once organic waste has been discarded.

- ❖ Water Management

All individuals responsible for activities which water management will receive job-specific training on the risks and potential repercussions of their appointment and work situation, as well as how to avoid environmental impacts and respond during an environmental incident or emergency.

- Emergency Response Plan

An Environmental Emergency Response Plan defines the process to follow to respond rapidly and effectively to and manage emergency situations that may arise because of the project.

This plan must be initiated when an emergency:

- Cannot be immediately brought under control;
- Has the potential to extend beyond site boundaries;
- Has the potential to significantly impact on the environment and/or community; and
- Requires assistance from External Emergency Services.

This plan outlines response actions for potential incidents of any size. It details response procedures that will minimize potential health and safety hazards, environmental damage, and clean-up efforts.

The plan has been prepared to ensure quick access to all the information required in responding to an emergency event. The plan will ensure that Contractors comply with all procedures described in this document.

- Intent

A Work Method Statement should be prepared prior to the commencement of any activities, detailing how this plan is to be implemented as well as details of relevant responsible parties for the implementation. The method statement must also reflect conditions of the IFC Performance Standard 1 and include the following:

- Areas where accidents and emergency situations may occur;
- Communities and individuals that may be impacted, as read in the specialist studies;
- Response procedure;
- Provisions of equipment and resources;
- Designation of responsibilities; and
- Communication, both internally and externally.
- The purpose of this plan is to define the emergency response structure and process of the project.

The objectives of the plan are:

- To ensure communication of all vital information as soon as possible;
- To provide clear guidance in the management of emergencies that have the potential to impact on life, property, environment, and community;
- Clearly define roles and responsibilities;
- To facilitate the reorganization and reconstruction activities so that normal operations can be resumed;

- For employees to be able to take prompt effective action to reduce the risk of injury, minimize environmental impact and property damage likely to result from emergencies;

23.2. Manner in which risks will be dealt with in order to avoid pollution or the degradation of the environment.

The following are broad measures to control or remedy any causes of pollution or environmental degradation that will be caused by the proposed activities:

- Contain potential pollutants and contaminants (where possible) at the source;
- Handle potential pollutants and contaminants (where possible) in bunded areas and on impermeable substrates;
- Ensure prompt clean-up of any spills;
- Implement a waste management system for all waste streams on site; and
- Investigate any I&AP claims of pollution or contamination caused by mining activities.
- During mining activities, it is critical that broad measures to control or remedy any sources of pollution or environmental degradation are implemented.

24. Specific information required by the Competent Authority.

(Among others, confirm that the financial provision will be reviewed annually.)

In accordance with the provisions of Regulation 23(3) of the EIA 2014 Regulations (as amended) the EIA should include all information required as set out in Appendix 3 and in terms of Regulation 23(4) of the Environmental Management Plan (EMP) should contain all information required as set out in Appendix 4. The EIA report must include the following:

- Details of the EAP who prepared the report and the expertise of the EAP, including a curriculum vitae;
- A plan, which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale;
- A description of the scope of the proposed activity;
- A description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context;
- A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred location;
- A public participation process in the Scoping and EIA;
- Impact Assessment, including methodology, of the necessary environmental aspects, including the nature, significance, extent, duration, and probability of the impacts occurring, positive and negative impacts, including mitigation and monitoring measures;
- An assessment of the proposed alternatives;

- A complete EMPr;
- The financial provision for the environmental liability which will be reviewed annually;
- An impact statement from the EAP, specific information the Competent Authority may require, and conditions for approval; and
- An EAP oath regarding the correctness of information provided in the report.

25. UNDERTAKING

The EAP herewith confirms:

a) The correctness of the information provided in the reports
b) The inclusion of comments and inputs from stakeholders and I&APs:
c) The inclusion of inputs and recommendations from the specialist reports where relevant; and
d) The acceptability of the project in relation to the finding of the assessment and level of mitigation proposed;

Appendix 1:

CVs of the EAPs

SUNDAY MISHACK MABASO

12 Thaxted Ave Mulbarton 2190 · 0745697312/0824614251
Email - sunday@vahlengweadvisory.co.za · LinkedIn Profile - Sunday Mabaso ·Twitter @Sun.dayMabaso

BIOGRAPHY

Mr. Sunday Mabaso is the founder and CEO of Vahlengwe Mining Advisory and Consulting. He's got extensive experience in mineral regulation gained from spending over 20 years (2000 – 2021) with the Department of Mineral Resources and Energy (DMRE) where he served his last seven years as Regional Manager (3 years in Northern Cape and 4 years in Gauteng) before his resignation to advance his career in business. In 2020 was nominated to the Task Team that developed the current "South Africa's Exploration Implementation Plan" where he served to its completion and the plan was officially gazetted by Minister of Mineral Resources and Energy in 2022.

He holds a National Diploma in Mine Surveying and a National Higher Diploma in Mineral Resource Management from Technikon Witwatersrand in 1999 and 2000 respectively, a Graduate Diploma (GDE) in Mining Engineering from University of Witwatersrand in 2009 and a Master of Business Administration (MBA) from Milpark Business School in 2021. Sunday also completed a Post Graduate Certificate in Climate Change and Energy Law from University of the Witwatersrand in 2021, a Certificate in Energy Efficiency and Sustainability from the University of Cape Town (UCT) in 2022 and Certificate in Mine Closure and Land Rehabilitation from University of Pretoria (UP) in 2022.

Sunday is a registered member of the Institute of Directors of South Africa (IoDSA), the Southern Institute of Mining and Metallurgy (SAIMM) and is an Environmental Assessment Practitioner registered with EAPASA, a member of the International Association of Impact Assessment South Africa (IAIAsa), member of the International Society for Development and Sustainability (ISDS). A committee member of the Environmental, Social and Governance (SAMESG) working group of the SAMCODES Standard Committee (SSC) responsible for developing the South African Mineral Reporting Codes. He has authored opinion and journal articles about South African mining legislation with interests focused on social and environmental impacts on mine communities affected by mining operations, past and present. Some of his articles are published in academic journals and books internationally.

PUBLICATIONS

Mabaso, SM. (2023) Legacy Gold Mine Sites & Dumps in the Witwatersrand: Challenges and Required Action. Natural Resources, 14, 65-77. https://doi.org/10.4236/nr.2023.145005

Mabaso, SM. (2023). Social and Environmental Challenges caused by Legacy Gold Mining in Johannesburg: Government's Action Plan. eBook: ISBN: 978-81-19491-53-7. DOI: 10.9734/bpi/npgees/v9/10672F

Ramontja, T. and Mabaso, S. 2022. *Evolution of South Africa's Mining Regulatory Framework as it Relates to the Empowerment and Participation of Mining Communities.* https://doi.org/10.1007/978-3-031-07048-8_6

PROFESSIONAL AFFILIATIONS

- EAPASA: Environmental Assessment Practitioner (EAP) No 2022/4485
- International Association of Impact Assessment South Africa (IAIAsa) No 7442
- Southern Institute of Mining and Metallurgy (SAIMM) No 709244
- Institute of Directors in South Africa (M.Inst.D)
- Land Rehabilitation Society of Southern Africa (LaRSSA)
- International Society for Development and Sustainability (ISDS)

COMMITTEES

- South African Mineral Reporting Codes (SAMCODES) Standards Committee, 2016 to 2021
- SAMCODES-ESG Subcommittee – 2021 to date

EXPERIENCE

01 MAY 2021 – DATE
FOUNDER AND CEO: VAHLENGWE MINING ADVISORY AND CONSULTING
CORE SERVICES

- MPRDA and NEMA
- Mining Charter
- Environmental, Social and Governance - ESG
- Mine Closure and Rehabilitation
- Waste Management
- Carbon Tax Reporting
- Compliance Inspections
- Assistance to junior and small-scale miners

01 AUGUST 2014 – 30 APRIL 2021

REGIONAL MANAGER, DEPARTMENT OF MINERAL RESOURCES AND ENERGY

(NORTHERN CAPE –AUGUST 2014 TO APRIL 2017 AND GAUTENG – MAY 2017 TO APRIL 2021)

- Effective implementation and administration of the MPRDA
- Implementation and administration of Environmental Management policies and regulations in terms of NEMA and NEM: Waste Act
- Implementation and administration of Social and Labour Plans in terms of MPRDA
- Evaluation of Mining and Prospecting Work Programs and monitoring compliance
- Management of Land Use in mining areas to promote development and coexistence.
- Management of community development through implementation of the Mining Charter
- Promoting participation of Historically Disadvantaged South Africans in the mining economy and the value chain
- Management of relations and conflict resolutions between mining communities and mining companies
- Management of Financial and Administrative systems and procedures in the Regional Office
- Provide support and advisory to the Deputy Director General in the department

01 APRIL 2007 – 31 JULY 2014

DEPUTY DIRECTOR: MINE ECONOMICS, DEPARTMENT OF MINERAL RESOURCES

- Adjudication of mineral rights applications and manage sustainability of mining operations in line with the Mining/Prospecting Work programs.
- Monitor compliance through inspections and issuing of compliance directives.
- Assisting junior coal miners to access export markets through the Quattro Task team.
- Assist new entrants and junior miners in the mining industry.
- Conduct asset and mineral valuations for tax purposes and Section 11 applications

01 DECEMBER 2000 – 31 MARCH 2007

INSPECTOR OF MINES, DEPARTMENT OF MINERALS AND ENERGY

- Monitor compliance with the Mine Health and Safety Act in the mines.
- Provide technical advice on conflict between land development and mining operations.

25 JANUARY 2000 – 30 NOVEMBER 2000

MINE SURVEYOR, TAVISTOCK COLLIERIES

05 AUGUST 1994 – 31 DECEMBER 2000

LEARNER OFFICIAL AND BURSAR, TAVISTOCK COLLIERIES

EDUCATION

FEBRUARY 2018 TO JULY 2021

MASTER OF BUSINESS ADMINISTRATION, MILPARK BUSINESS SCHOOL

- Advanced Business Research Methodology
- Business Ethics and Corporate Governance
- Business in Emerging Markets
- Business Report Writing, Quantitative Analysis and Presentation Skills

- Dissertation
- General Management Environment
- Global Trade (Macro-economic – BRICS – Developing Markets)
- Integrated Business Strategy
- Leadership and Change Management
- Management Accounting and Finance (part 1)
- Management Accounting and Finance (part 2)
- Marketing and Sales Management
- Operations and Technology Management
- People Management
- Social Responsibility and Environmental Management

JUNE 2022 TO NOVEMBER 2022
CERTIFICATE: MINE CLOSURE AND LAND REHABILITATION, UNIVERSITY OF RETORIA (UP)

- Closure Design
- Regional Planning considerations and operational mitigation
- Land preparation and soil management
- Land cover/surface stabilization-economic value
- Maintenance and land management systems
- Identifying closure planning challenges and problem areas
- Mine closure planning consideration
- Closure document required Baseline environment and closure risks
- Closure success criteria and rehabilitation monitoring
- Financial provisioning and social planning

OCTOBER 2021 TO DECEMBER 2021
CERTIFICATE: ENERGY EFFICIENCY AND SUSTAINABILITY, UNIVERSITY OF CAPE TOWN (UCT)

- Energy -importance, Strategy and Challenges
- Energy Metrics, Economics and Efficiency
- Energy-efficient and Sustainable Buildings
- Energy-efficiency management and technologies in buildings
- Energy-efficiency management and technologies in industrial sector
- Energy auditing
- Energy measurement verification and management systems

MARCH 2021 TO JULY 2021
POST GRADUATE CERTIFICATE: CLIMATE CHANGE AND ENERGY LAW, UNIVERSITY OF WITWATERSRAND

- Climate Change and Energy
- Energy Law Concepts and Economics
- Theories of Energy and Climate Regulation
- Sources of Energy: Fossil Fuels
- Sources of Energy: Petroleum Sector
- Sources of Energy: Gas Sector
- The South African Electricity Supply Industry
- Climate Change Law and Policy Framework

- Energy, Climate Change & Just Transition
- Nuclear as a Source of Electricity
- Energy Efficiency and Demand Side Management
- Regulation of Energy Procurement

OCTOBER 2014 TO JANUARY 2015
CERTIFICATE IN BASIC TRAINING FOR ENVIRONMENTAL MINERAL RESOURCE INSPECTORS, UNIVERSITY OF PRETORIA

- Constitutional Background
- NEMA and MPRDA framework legislation
- Sustainable Development
- EIA process, Scoping reports, and review of EA applications and Integrated EAs
- WASTE Act
- The Air Quality Act
- The Environmental Conservation Act
- The National Water Act
- The Integrated Coastal Management Act
- The Biodiversity Act
- The Protected Areas Act
- Administrative Law
- Criminal Enforcement
- Special forms of Liability
- Powers of Environmental Mineral Resources Inspectors-EMRI
- Ethics, Health and Safety and relevant issues
- Sampling
- Inspections
- Investigations
- Appeals
- Exemptions and exceptional circumstances

MARCH 2006 TO NOVEMBER 2008
GRADUATE DIPLOMA IN MINING ENGINEERING, UNIVERSITY OF WITWATERSRAND

- Mineral Economics
- Mineral Policy and Investment
- Compliance and Reporting Rules in the Mining Industry
- Economic Geology of South African Coal
- Coal extraction and Exploitation
- Coal and the Environment

JULY 1999 TO JULY 2000
NATIONAL HIGHER DIPLOMA, MINERAL RESOURCE MANAGEMENT, TECHNIKON WITWATERSRAND

JULY 1996 TO MAY 1999
NATIONAL DIPLOMA, MINE SURVEYING, TECHNIKON WITWATERSRAND

SKILLS

- In-depth understanding of the mining industry and its economic value chain
- In-depth understanding of the regulatory and compliance regime in the mining industry
- In-depth understanding of the value of mining in the South African and Global economy
- Good communication skills
- Conflict resolution
- Good decision making
- Ability to work under pressure.
- Time management
- Good Leadership and management

PERSONAL INFORMATION

I'm a male South African Tsonga speaking citizen, born on 29 November 1976 in Bushbuckridge, Mpumalanga Province where I started my primary schooling at Mpikaniso Primary school in 1983 and matriculated at Orhovelani High School in 1993.

I'm currently married with four children and residing in Mulbarton, Johannesburg South since June 2017 after my transfer from the Kimberly as the Regional Manager of the Northern Cape to the Johannesburg office where I also served as Regional Manager for the Gauteng Region until 30 April 2021 upon resignation.

COMMUNITY INVOLVEMENT AND PERSONAL HOBBIES

I'm currently involved in community development projects in Bushbuckridge through career guidance, cultural activities, and sport to guide the youth to focus on their vision and education goals as part of giving back to my community and assist the future generation. I have sponsored soccer kits, traditional dancing activities and motivational seminars in my village since 2009.

My personal hobbies include playing golf, watching, and following soccer, rugby, and other national sporting codes. Mentoring my kids through schoolwork and sport. I spend more time outside work with my family to groom my kids to become better citizens and leaders of the future generation.

REFERENCES

Mr Mosa Mabuza
Chief Executive Officer
Council for Geoscience
012 841 1911
082449 8650
88 9122
mmabuza@geoscience.org.za

Dr Thibedi Ramontja
Former Director General: DMRE
Currently Director: School of Mining
University of Witwatersrand
083 3

thibedi.ramontja@wits.ac.za /
Ramontja2@gmail.com

Dr Tania Marshall
Director: School of Mining
University of Witwatersrand
082 611 3388
marshall.tania@gmail.com

Environmental Assessment Practitioners Association of South Africa

Registration No. 2022/4485

Herewith certifies that

SUNDAY MISHACK MABASO

is registered as an

Environmental Assessment Practitioner

Registered in accordance with the prescribed criteria of Regulation 15. (1) of the Section 24H Registration Authority Regulations (Regulation No. 849, Gazette No. 40154 of 22 July 2016, of the National Environmental Management Act (NEMA), Act No. 107 of 1998, as amended).

Effective: 01 April 2026

Expires: 31 March 2027

Chairperson

Registrar

SAQA
SOUTH AFRICAN QUALIFICATIONS AUTHORITY

DIMAKATSO ELIZABETH LEHOLI

Name: Dimakatso Elizabeth Leholi

Date Of Birth: 15 May 2002

Profession/ Specialization: Environmental Assessment Practioner

Years Of Experience: 3 Years

Languages: English, Sesotho and IsiZulu

PROFILE

Dedicated and results driven Environmental Assessment Practioner with 3 years of experience in environmental consulting, specializing in Environmental Impact Assessments, project management and stakeholder engagement. Holding a National Diploma in Environmental Sciences from Tshwane University of Technology, I possess in-depth knowledge of environmental legislation, including NEMA, NEMWA, NEMAQA, NWA and MPRDA. Proven track record of delivering high-quality reports and managing projects efficiently. A team player with excellent communication skills, adaptability and strong commitment to environmental sustainability. My goal is to contribute to protecting the environment and promoting sustainable development through Environmental, Social and Governance for sustainable development in the mining industry. To give the best and reliable advisory solutions to clients.

EXPERIENCE

Position: Environmental Consultant

Company: Vahlengwe Mining Advisory and Consulting

Duration: March 2022- Present

DUTIES

- Conducting environmental impact assessments (EIAs) for prospecting, mining rights and mining permits to identify potential environmental impacts and develop mitigation measures.

- Preparing and reviewing EIA reports, including scoping reports, basic assessment reports, environmental management plans/programmes and environmental authorization applications.
- Conducting environmental audits and risk assessments to identify areas for improvement.
- Providing guidance to mining clients on environmental management best practices.
- Ensuring compliance with environmental regulations, laws, and standards relevant to the mining industry, including the National Environmental Management Act (NEMA) and the Mineral and Petroleum Resources Act (MPRDA).
- Liaising with regulatory authorities such as the Department of Mineral Resources and Energy and the Department of Forestry and Fisheries and Environment (DFFE).
- Preparing and submitting environmental authorization applications and reports.
- Conducting stakeholder engagement and public participation processes for mining or prospecting projects, including community meetings and other form of engagement.
- Liaising with local communities and other stakeholders.
- Coordinating with multidisciplinary teams, including engineers, scientists, and other stakeholders' environmental consultants.
- Ensuring projects are delivered on time, within budget, and to the required quality standards.
- Maintaining professional registration with EAPASA.
- Participating in continuing professional development (CDP) activities.
- Staying current with industry developments and trends.
- Serving as a Management System Coordinator for ISO 9001,14001 and 45001, driving integrated management systems in a mining advisory and consulting company.

Position: Safety Officer Intern

Company: Supergrid Manufacturing (Pty) Ltd

Duration: February 2021- February 2022

DUTIES

SAFETY

- Conducting risk assessments and hazard identification in the workplace.
- Assisting in developing and implementing safety policies and procedures.

- Participating in in safety audits and inspections to ensure compliance with regulations.
- Investigating incidents and near-misses to identify root causes and implement corrective actions.

HEALTH

- Assisting in monitoring and maintaining occupational health standards.
- Participating in in health risk assessments and developing strategies to mitigate health hazards.
- Collaborating with the health team to promote employee wellbeing and provide health related support.

EDUCATION

Institution: Tshwane University of Technology

Qualification: Diploma in Environmental Sciences

Status: Completed in 2023

PROFESSIONAL AFFILIATIONS

Candidate EAP- Environmental Assessment Practitioners of South Africa

Candidate Scientist. Environmental Sciences- South African Council for Natural Scientific Professions- (Application still under review)

SKILLS

- Strong communication
- Analytical and logical thinking
- Gathering and analysing information
- Conflict resolution and negotiation
- Presentation and public speaking
- Multidisciplinary problem solving
- Technical writing skills.
- GIS tools mapping
- Project management

REFERENCES

Available upon request.

Environmental Assessment Practitioners Association of South Africa

Registration No. 2023/6647

Herewith certifies that

DIMAKATSO ELIZABETH LEHOLI

is registered as an

Candidate Environmental Assessment Practitioner

Registered in accordance with the prescribed criteria of Regulation 15. (1) of the Section 24H Registration Authority Regulations (Regulation No. 849, Gazette No. 40154 of 22 July 2016, of the National Environmental Management Act (NEMA), Act No. 107 of 1998, as amended).

Effective: 01 April 2026

Expires: 31 March 2027

Chairperson

Registrar

SAQA
SOUTH AFRICAN QUALIFICATIONS AUTHORITY

Appendix 2A:

Locality map and Regulation 2(2)

Dunrose Investment 174 (PTY) Ltd

Mining Right Application area in respect of the Remaining Extent of Portion 1 and Remaining Extent of the Farm Schurfde Poort 1147 GS; The Farm Shaws No.11317 GS; Portion 1 and the Remaining extent of the Farm Ganna Hoek 1317 GS; Portion 1 and the Remaining extent of the Farm Klip Berg 2158 GT; The Farm Brakfontein 1316 GS; Portions 1, 2, and the Remaining Extent of the Farm Ramak 13696 GT, in the uThukela/ Escourt District, KwaZulu- Natal Province.

N

Somshoek
Imbangi
Ezakheni
Hillside
Ladysmith Airfield
Acaciavale
Ezakheni A
Doornkloof
Umbulwana
Ezakheni D
Ezakheni E
Ezakheni C
Pieters Hoek
Brakfontein
Colenso
Nkankezi
Tugela Estates
Impembeni
Chieveley
Cornfields
Weenen Game Reserve

0 2 500 5 000 10 000 15 000 20 000 Meters

Legend

Mining Right Area

VAHLENGWE MINING ADVISORY AND CONSULTING

Diagram A - S represents the application area in respect of the Remaining Extent of Portion 1 and the d Remaining Extent of the Farm Schurfde Poort 1147 GS; The Farm Shaws No.11317 GS; Portion 1 and the Remaining extent of the Farm Ganna Hoek 1317 GS; Portion 1 and the Remaining extent of the Farm Klip Berg 2158 GT; The Farm Brakfontein 1316 GS; Portions 1, 2, and the Remaining Extent of the Farm Ramak 13696 GT.

From point A to B is along the Tugela River.

Name	POINT_X	POINT_Y
A	29,91049	-28,67920
B	30,05425	-28,70335
C	30,02780	-28,73183
D	30,01941	-28,72565
E	30,01462	-28,72567
F	30,01788	-28,71603
G	30,01191	-28,71288
H	30,01107	-28,70908
I	30,00376	-28,71319
J	30,00090	-28,71115
K	30,00132	-28,70967
L	29,99223	-28,70555
M	29,98871	-28,70765
N	29,97620	-28,69915
O	29,97679	-28,69602
P	29,95565	-28,70178
Q	29,95693	-28,70768
R	29,93141	-28,71936
S	29,91131	-28,70514

Kilometers

0 0,88,75 3,5 5,25 7

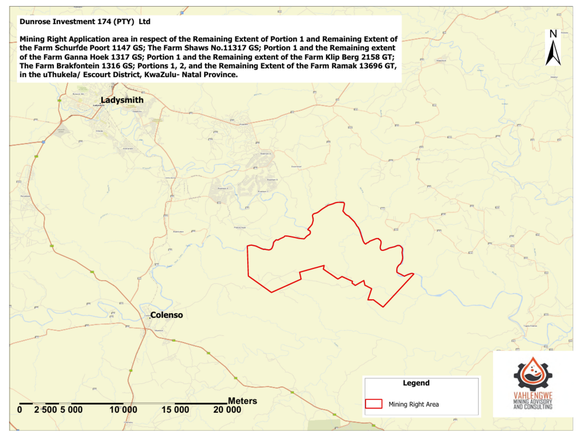
Dunrose Investment 174 (PTY) Ltd

REGULATION 2 (2)
THE APPLICATION OF THE MINING RIGHT OF THE SECTION 22 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (MPRDA) (ACT 28 OF 2002)

Application Extent: 6 333, 2240 ha

Legend
- Points location
- Mining Right Area
- NFEPA_Wetlands

Plan Approval
Applicant
Signature:.....
Date:.....
Surveyor
Signature:.....
Date:.....
Regional Manager
Signature:.....
Date:.....



PREPARED BY

VAHLENGWE MINING ADVISORY AND CONSULTING

Johannesburg South	
Help Desk	Tel +27 (0) 11432 0062
230 Voster Ave Street	Tel +27 (0) 11432 0062
Glenvister 2058	Email info@vahlengweadvisory.co.za

Coordinate System: WGS 84

Appendix 2B:

Site Plan Map


Dunrose Investments 174 (Pty) Ltd
Colenso Mine Plan
Legend:
Area Boundary
Reil-veyor
Water Pipeline
Power Lines
Phase 1
Phase 2
High-Wall Mining Area
Underground Mining
Rail-Veyor Control 1
Mining Admin Office 2
Mining Equipment Workshops 3
Lay Down Area 4
Change House & Ablutions 5
Mine Store 6
Highwall Mining PCD1 7
Highwall Mining PCD2 8
Explosives Magazine 9
BRAKFONTEIN
Olubomvu
Mziyonke Primary Sc
Mziyanke
Makahyana
Mzinyonke
Qinisa Public Primary School
7 PCD1
8 PCD2
Mine Store
Lay-Down Area
6
5
4
Change House-Ablutions
Mining Equipment Workshops
3
9 Magazine
Mining Admin Offices
2
1
Potential Rail-veyor or coal conveyor paths
Tugela River
Emaweni Tugela Canyon Lodge
Zingela Safari &
Image © 2025 Airbus

Appendix 2C:

Land use map

LAND USE MAP

The proposed application area in respect of the Farms Remaining Extent of Portion 1 and Remaining Extent of the Farm Schurfde Poort 1147 GS; The Farm Shaws No.11317 GS; Portion 1 and the Remaining extent of the Farm Ganna Hoek 1317 GS; Portion 1 and the Remaining extent of the Farm Klip Berg 2158 GT; The Farm Brakfontein 1316 GS; Portions 1, 2, and the Remaining Extent of the Farm Ramak 13696 GT

Area Extent: 6 333, 2240 ha

N

Legend

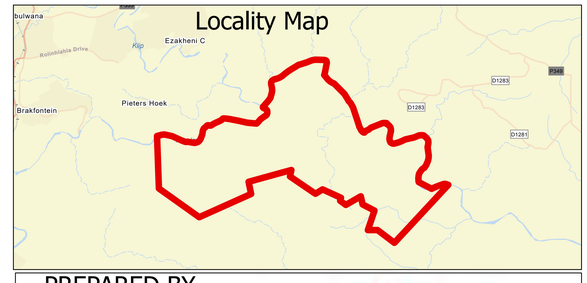
- Gravel Road
- Roads
- Railway lines
- Cultivated lands
- Build-up
- Mining Right Area

NFEPA_Wetlands
NATART

- Artificial
- Estuaries
- Natural

2,3 1,15 0 2,3 4,6 6,9 9,2 Kilometers

Locality Map



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Glenvister 2058	Email info@vahlengweadvisory.co.za

Appendix 2D:

Composite map

Composite Map

Mining Right Application area in respect of the Remaining Extent of Portion 1 and Remaining Extent of the Farm Schurfde Poort 1147 GS; The Farm Shaws No.11317 GS; Portion 1 and the Remaining extent of the Farm Ganna Hoek 1317 GS; Portion 1 and the Remaining extent of the Farm Klip Berg 2158 GT; The Farm Brakfontein 1316 GS; Portions 1, 2, and the Remaining Extent of the Farm Ramak 13696 GT.

Area Extent: 6 333, 2240 ha

28°36'40"S
28°40'50"S
28°45'S
29°55'50"E
30°E
30°4'10"E
N
Kilometers
0 1 2 4 6 8

Legend

- Mining Right Area
- Rivers
- 50 M Buffer
- 100 M Buffer
- 200 M Buffer

NFEPA_Wetlands

NATART

- Artificial
- Estuaries
- Natural
- <all other values>

PREPARED BY

VAHLENGWE MINING ADVISORY AND CONSULTING

Johannesburg South	
Help Desk	Tel +27 (0) 11432 0062
230 Voster Ave Street	Tel +27 (0) 11432 0062
Glenvister 2058	Email info@vahlengweadvisory.co.za

Appendix 3:

Public Participation Process

Appendix 3A:

Background Information Document

BACKGROUND INFORMATION DOCUMENT FOR THE ENVIRONMENTAL AUTHORIZATION: MINING RIGHT APPLICATION

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE MINING RIGHT APPLICATION OF COAL IN RESPECT OF REMAINING EXTENT OF PORTION 1 AND REMAINING EXTENT OF THE FARM SCHURFDE POORT 1147 GS; THE FARM SHAWS NO.11317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM GANNA HOEK 1317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM KLIP BERG 2158 GT; THE FARM BRAKFONTEIN 1316 GS; PORTIONS 1, 2 AND THE REMAINING EXTENT OF THE FARM RAMAK 13696 GT WITHIN THE ADMINISTRATIVE DISTRICT OF UTHUKELA/ ESTCOURT, KWA-ZULU NATAL PROVINCE.

DMPR REFERENCE NUMBER: KZN30/5/1/2/2/10137 MR

PURPOSE OF THIS DOCUMENT

This Background Information Document (BID) has been prepared as part of the notification and consultation process required in terms of the National Environmental Management Act (NEMA) (Act 107 of 1998). It describes the following:

- Background information regarding the proposed project;
- Information about the site and the proposal being considered;
- Public participation process; and
- Suggestions on how the stakeholders, Including the I&Aps can participate in the process.

INTRODUCTION AND PROJECT BACKGROUND

Farms and Portions Affected:

Remaining extent of Portion 1 of the Farm Schurfde Poort 1147 GS;

Remaining extent of the Farms Schurfde Poort 1147 GS;

The Farm Shaws no.11317 GS;

Portion 1 and the Remaining Extent of the Farm Ganna Hoek 1317 GS;

Portion 1 and the

Remaining Extent of the Farm Klip Berg 2158 GT;

Dunrose Investments has an existing Prospecting right in respect of the above-mentioned portions and farms under reference number KZN30/5/1/1/2/10662PR.

Vahlengwe Mining Advisory and Consulting has been appointed by Dunrose to undertake the Environmental Authorisation (EA) and associated Public Participation Process (PPP) required for the proposed project to comply with NEMA and other legislations.

	the Farm Brakfontein 1316 GS; Portions 1, 2 and the Remaining Extent of the Farm Ramak 13696 GT
District:	uThukela District
Local Municipality:	Inkosi Langalibalele Local Municipality
Province:	KwaZulu-Natal
Arial Extent:	6 333,2240 ha

PUBLIC PARTICIPATION PROCESS

Public involvement is an essential component of the process. It addresses the right of Interested and Affected Parties (I&Aps) to be informed of the proposed activities. All I&Aps are invited to submit

Their issues, concerns, and comments regarding the proposed Highwall coal mining activities to Dunrose via email or telephonically. The I&Aps Registration Form is made available below for you to fill in your personal details and comments,

Kindly do so and submit back to us.

PROJECT APPLICANT

Applicant:	Dunrose Investments 174 (Pty) Ltd
Contact Person:	Debbie James
Address:	Plot 32 Rhenosterfontein Rayton 1001

METHODOLOGY OF THE PPP:

HOW TO OBTAIN FURTHER INFORMATION:

Registering as I&Aps will ensure that you are placed on a database to be informed of any

Issuing of notification of notification of this Project to:

- ❖ Owners and occupiers of the properties;
- ❖ As well as those adjacent to the site.
- ❖ Municipal Councillor
- ❖ The municipality which has jurisdiction,
- ❖ And any Organ of State having jurisdiction

- ➢ Placing an advert in a newspaper
- ➢ Placing Site Notice Boards
- ➢ Distribution of the BID
- ➢ Meeting with the landowners and key I&Aps
- ➢ Public review of the Draft Scoping Report and Impact Assessment Reports.

progress regarding the project. You can do so by filing in the form below and return it to the relevant person listed below. We encourage the I&Aps to review the information presented to you in this Background Information Document (BID) and to register as an I&AP for the attached respondent sheet and return it to us.

PUBLIC CONSULTATION CONTACTS:

Name:	**Sunday Mabaso**
Postal address:	238 Voster Ave Glenvista Ext 3 Johannesburg South 2058
Contact:	011 432 0062
Email:	info@vahlengweadvisory.co.za

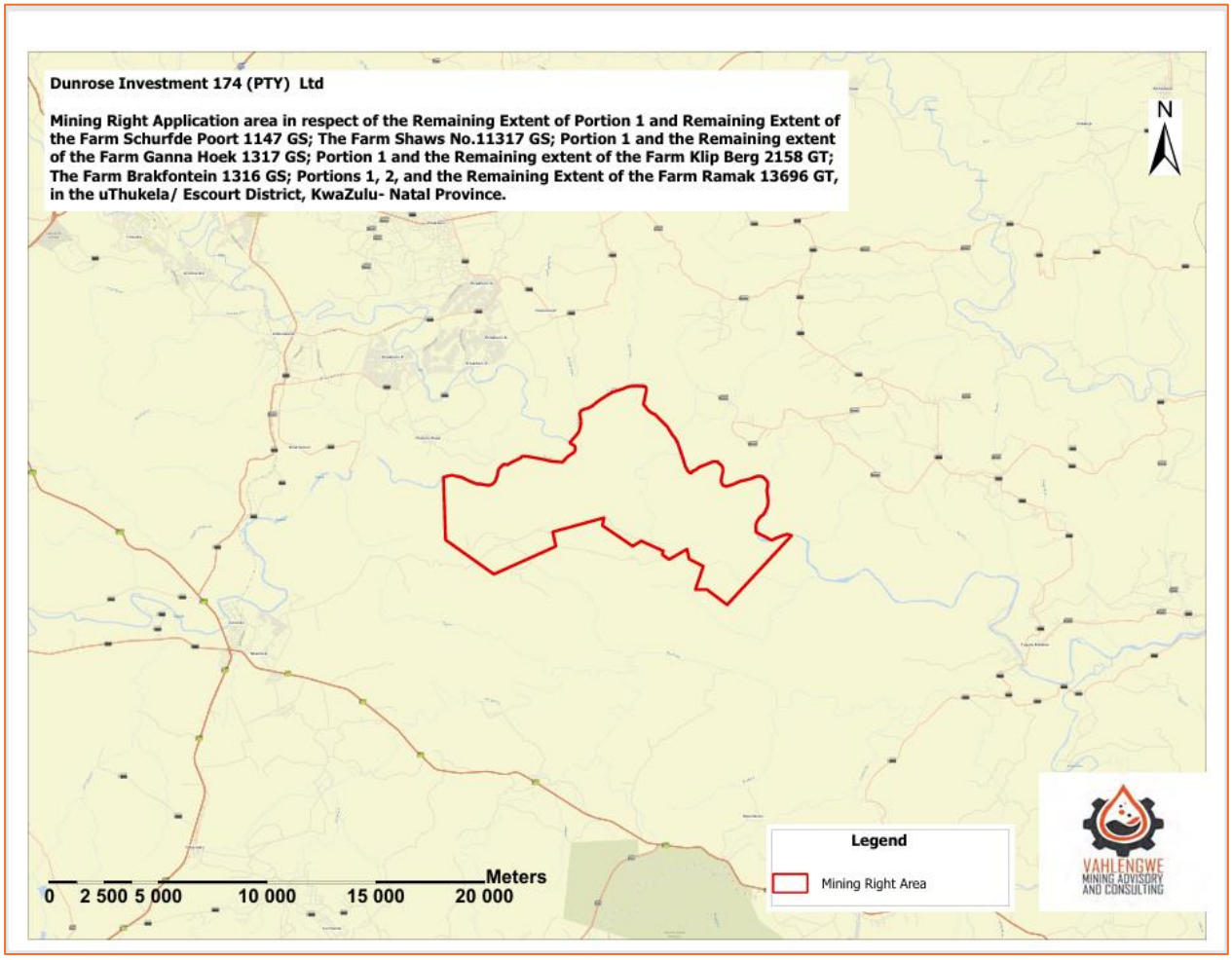


Figure 1: Locality Map of the proposed mining right area.

Appendix 3B:

Interested and Affected Parties Registration Form

Public Participation Process
Environmental Authorization:
Environmental Impact Assessment &
Environmental Management Programme
(EIR &EMPR)
KZN30/5/1/2/2/10137 MR

Interested and Affected Party Registration Form

Please provide your complete contact details:

(Make a X on the appropriate category.)

Landowner		Adjacent owner	
Land occupier		Organisation	
Business		Other (I&AP)	

Title	**Ms**		**Mrs**		**Mr**		**Other**
Name							
Surname							
Physical Address							
Cell Number							
Telephone Number							
Email Address							
Please indicate your preferred method of communication	SMS		Email				
Please indicate any issues, comments, and concerns regarding the proposed project.							
Please indicate in which aspects you would require more information							
Please indicate any I&APs whom you think should be contacted.							

We consent to the processing of our personal information in accordance with the Protection of Personal Information Act (POPIA) and understand that our information will be handled in a manner that is transparent, lawful and secure.

To be registered as an I&AP for this project, email the completed registration form to:

EAP: Sunday Mabaso

Address: 238 Voster Ave, Glenvista Ext 3, Johannesburg South,2058

Phone: 011 432 0062/ 074 569 7312

Email: info@vahlengweadvisory.co.za

Appendix 3C:

Newspaper Advertisement

NOTICES

DUNROSE INVESTMENTS 174(PTY) LTD

NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT PROCESS
INVITATION TO REGISTER AS AN INTERESTED AND AFFECTED PARTY AND COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT.

DMPR REFERENCE NO: KZN30/5/1/2/2/10137 MR

Notice is hereby given in the intent to conduct Environmental Authorization process for an application of a mining right of coal for Dunrose Investment (Pty) Ltd in terms of National Environmental Management Act- NEMA (Act 107 of 1998) as amended, and the Environmental Impact Assessment (EIA) Regulations, 2014. Notification is hereby given to all Interested and Affected Parties (I&APs) in terms of Section 39 to 44 of GNR 982. The EIA process would be undertaken in terms of these guidelines and to be submitted to the Competent Authority Department of Mineral and Petroleum Resources (DMPR).

THE ABOVE ACTIVITIES TRIGGERS:

GNR 984 (Listing Notice 2); Activity 17:
Any activity including the operation of that activity which requires a mining right in terms of section 22 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice, in Listing Notice 1 of 2014 or Listing Notice 3 of 2014, required to exercise the mining right.

PROPOSED SITE LOCATION:

FARMS AND PORTIONS:	Remaining Extent of Portion 1 and Remaining Extent of the Farm Schurfde Poort 1147 GS; The Farm Shaws No. 11317 GS, Portion 1 and the Remaining Extent of the Farm Ganna Hoek 1317 GS, Portion 1 and The Remaining Extent of the Farm Klip Berg 2158 GT; The Farm Brakfontein 1316 GS; Portions 1, 2 and the Remaining Extent of the Farm Ramak 13696 GT;
MUNICIPALITY:	uThukela District
LOCAL MUNICIPALITY:	Inkosi Langalibalele Local Municipality
PROVINCE:	KwaZulu-Natal Province

PUBLIC MEETING:

Public meeting will be held to facilitate discussions on the Draft Environmental Impact Assessment Report and Environmental Management Programme Report to obtain comments and inputs from the Interested and Affected Parties (I&APs), therefore you are requested to register your names as I&APs within 15 days, thus, on/before 19 July 2025. You are further requested to submit your comments within 30 days from the date this notice was published. Take note that your comments must be submitted on or before the 03 August 2025 to the details below:

Consultant : Vahlengwe Mining Advisory and Consulting
Contact person : Sunday Mabaso
Postal address : 238 Voster Ave, Glenvista Extension 3, Johannesburg South, 2058
Contact : 011 432 0062/ 074 569 7312
E-mail : info@vahlengweadvisory.co.za

DUNROSE INVESTMENTS 174(PTY) LTD

ISAZISO NGOCWANINGO LWEZINTO EZITHINTHA IMVELO
ISIMEMO SOKUBHALISA NJENGABANTU ABANENTSHISEKELO NABATHINTEKAYO KANYE NOKUPHAWULA KUMBIKO OSALUNGWAYO WOKUHLOLA UMTHETHO WENDALO NEMVELO KANYE NOHLELO LOKUPHATHWA KWEZOKUGCINA.

INKOMBA YMNYANGO WEZIMBIWA: KZN 30/5/1/2/2/10137 MR

Isaziso siyanikezwa ngenhloso yokuqhuba inqubo yokugunyazwa kwezeMvelo ehambisana nesicelo selungelo lokumba amalahle yinkmpani iDunrose Investment (Pty) Ltd ngokoMthetho Kazwelonke Wokuphathwa Kwemvelo-NEMA (uMthetho 107 ka-1998) njengoba uchitshiyelwe, kanye neMithethonqubo Yokuhlola Impatho Yezemvelo (EIA) ka-2014. Ngakho-ke isaziso sinikezwa bonke Abanentshisekelo Nabathintekayo (I&APs) ngokweSigaba 39 kuya ku-44 se-GNR 982. Inqubo ye-EIA izokwenziwa ngokwale mihlahlandlela futhi izothunyelwa eMnyangweni Onegunya Lokusebenza Wezimbiwa Nezithombo zePetroleum (DMPR).

LE IMISEBENZI EPHEZULU IMBANGELA:

I-GNR 984 (Isaziso Sohlu 2); Umsebenzi 17:
Noma yimuphi umsebenzi ohlanganisa ukusebenza kwalowo msebenzi odinga ilungelo lezimayini ngokwesigaba 22 soMthetho Wokuthuthukiswa Kwezimbiwa kanye Nezithombo Zamafutha, kanye nanoma yimuphi omunye umsebenzi osebenzayo njengoba uqukethwe kulesi Saziso Sohlu, eSaziso Sohlu 1 sika-2014 noma Isaziso Sohlu 3 sika-2014, esidingekayo ukuze usebenzise ilungelo lokumba.

INDAWO YESIZWE EHLOSWE UKUMBA AMALAHLE:

AMAPULAZI NEZINXENYE:	Ingxenye Esele Yengxenye 1 kanye Nengxenye Esele Yepulazi i-Schurfde Poort 1147 GS; I-Pulazi Shaws No. 11317 GS, Ingxenye 1 kanye Nengxenye Esele Yepulazi i-Ganna Hoek 1317 GS, Ingxenye 1 kanye Nengxenye Esele Yepulazi i-Klip Berg 2158 GT; Ipulazi iBrakfontein 1316 GS; Izingxenye 1, 2 kanye Nengxenye Esele Yepulazi iRamak 13696 GT;
UMASIPALA:	Isifunda uThukela
UMASIPALA WENDAWO:	Inkosi Langalibalele Local Municipality
SIFUNDAZWE	KwaZulu-Natal Isifundazwe

UMHLANGANO WOMPHAKATHI:

Umhlangano womphakathi uzobanjwa ukuze kuxoxwe ngoMbiko Osalungiswa Wokuhlolwa Komthelela Emvelweni kanye Nombiko Wohlelo Lokuphathwa Kwemvelo ukuze utholwe imibono kanye nokuzwa Kwabathintekayo nabanentshisekelo (I&APs), ngakho-ke uyacelwa ukuthi ubhalise amagama wakho njengama-I&APs zingakapheli izinsuku eziyi-15, ngakho-ke, ngaphambi/ngaphambi komhla zi-19 uNtulikazi wezi-2025. Uyacelwa futhi ukuthi ulethe imibono yakho zingakapheli izinsuku ezingama-30. Qaphela ukuthi ukuphawula kwakho kufanele kuthunyelwe ngaphambi noma ngomhla zingama-03 uNcwaba 2025 kule mininingwane engezansi:

Umxhumanisi: Vahlengwe Mining Advisory and Consulting
Othintana naye: Sunday Mabaso
Ikheli leposi : 238 Voster Ave, Glenvista Extension 3, Johannesburg South, 2190
Thintana: 011 432 0062/ 074 569 7312
E-mail: info@vahlengweadvisory.co.za

Please be advised that the deadline for submitting advertisements, legal notices, and general notices to the Ladysmith Gazette will be 4:00 PM on Mondays

ALFRED DUMA LOCAL MUNICIPALITY
NOTICE TO THE PUBLIC -
COUNCIL AND MUNICIPAL PUBLIC ACCOUNTS COMMITTEE (MPAC) MEETINGS:
JULY 2025 TO JUNE 2026

Notice is hereby given to the community of the Alfred Duma Local Municipality, in terms of Section 19 of the Municipal Systems Act, No. 32 of 2000, of the day, date, time and venue of the COUNCIL and MUNICIPAL PUBLIC ACCOUNTS COMMITTEE (MPAC) MEETINGS of the Alfred Duma Local Municipality, for the period July 2025 to June 2026 as approved by the Ordinary Council Meeting held on 29 May 2025 as per LC13/05/2025.

Members of the public who wish to be part of any particular Council meeting to request the zoom link prior to the meeting. Such request must be addressed to bmadondo@alfredduma.gov.za and shmassyn@alfredduma.gov.za.

MONTH	DAY	DATE	TIME	MEETING	VENUE
JULY 2025	Monday	14	10:00	MPAC	Council Chamber/ Virtual
	Thursday	24	10:00	COUNCIL	Town Hall/ Virtual
AUGUST 2025	Monday	18	10:00	MPAC	Council Chamber/ Virtual
	Thursday	21	13:00	COUNCIL	Town Hall / Virtual
	Thursday	28	10:00	COUNCIL	Town Hall/ Virtual
SEPTEMBER 2025	Monday	15	10:00	MPAC	Council Chamber/ Virtual
	Thursday	25	10:00	COUNCIL	Town Hall/ Virtual
OCTOBER 2025	Monday	20	10:00	MPAC	Council Chamber/ Virtual
	Thursday	30	10:00	COUNCIL	Town Hall/ Virtual
NOVEMBER 2025	Monday	17	10:00	MPAC	Council Chamber/ Virtual
	Thursday	27	10:00	COUNCIL	Town Hall/ Virtual
DECEMBER 2025	Monday	8	10:00	MPAC	Council Chamber/ Virtual
	Thursday	11	10:00	COUNCIL	Town Hall / Virtual
JANUARY 2026	Monday	19	10:00	MPAC	Council Chamber / Virtual
	Thursday	29	10:00	COUNCIL	Town Hall / Virtual
FEBRUARY 2026	Monday	16	10:00	MPAC	Council Chamber/ Virtual
	Thursday	26	10:00	COUNCIL	Town Hall/ Virtual
MARCH 2026	Monday	16	10:00	MPAC	Council Chamber/ Virtual
	Thursday	26	10:00	COUNCIL	Town Hall / Virtual
APRIL 2026	Monday	20	10:00	MPAC	Council Chamber/ Virtual
	Thursday	30	10:00	COUNCIL	Town Hall / Virtual
MAY 2026	Monday	18	10:00	MPAC	Council Chamber/ Virtual
	Thursday	28	10:00	COUNCIL	Town Hall/ Virtual
JUNE 2026	Monday	15	10:00	MPAC	Council Chamber/ Virtual
	Thursday	25	10:00	COUNCIL	Town Hall/ Virtual

EXTERNAL NOTICE NO. 51/2025 **DATED: 24/06/2025**

S S NGIBA
MUNICIPAL MANAGER

OKHAHLAMBA
LOCAL MUNICIPALITY • UMKHANDLU WENDAWO

PUBLIC NOTICE

APPLICATIONS FOR INDIGENT SUPPORT, DISCOUNT ON ADVANCE PAYMENT, PENSIONER'S AND DISABLED OWNERS REBATE & ARRANGEMENT FOR DEBT SETTLEMENT

2025/2026 FINANCIAL YEAR

Okhahlamba Local Municipality hereby as prescribed within the Municipal Property Rates Act and The Local Government: Municipal Systems Act 32 of 2000 supported by the Rates Policy and the Indigent Support Policy of Okhahlamba Local Municipality.

1. Indigent Support, Pensioner's & Disabled Owners Rebates:
Calls for the public to apply in the prescribed manner on approved rebate application forms as follows:

* **Indigent Support -** Combined Household income not exceeding R6 350 or R76 200 p/m
* **Pensioners Rebate** – Combined Household income should not be less than R 5 230 p/m or R62 760 p/a and not exceeding R 18,000.00 p/m (Closing date 31 August 2025)
* **Disabled Owners Rebate –** Combined Household income should not be less than R 4 630 p/m or R55 560p/a (Closing date 31 August 2025)

Kindly be informed that strict criteria will be applied for these rebates.

2. Discount on Advance payments:
Persons who wish to settle their rates in advance by latest 31 August 2025 have to submit an application letter in writing by no later than 31 August 2025 in order to qualify for 5% discount on early settlements. No formal application form needs to be completed as the letter of application is adequate. Please state your account number, name of registered owner and property description in all correspondence.

3. Arrangement for debt settlement
Persons who wish to settle their long outstanding debt (more than 90 days) have to submit an application letter in writing and a formal application form needs to be completed and submitted to the municipality. Please state your account number, name of registered owner and property description in all correspondence.

4. Public Benefit Organisation Rebate
Okhahlamba Local Municipality calls upon Public Benefit Organisations performing a specific public benefit activity and registered in terms of the Income Tax Act, Item 1, 2 and 4 of part 1 of the Ninth Schedule, for tax deduction because of those activities, must provide to the satisfaction of the Chief Financial Officer or his delegate that they comply with the criteria and requirements of the municipality's Rates policy. Organisations who wish to apply for the rebate must submit a formal application form by no later than 31 August 2025.

Emails for discount applications can be sent to:
nmbhele@okhahlamba.gov.za
celiwe.hadebe@okhahlamba.gov.za

Application forms for special rebates can be obtained from the offices below:
Rates Office
Winterton Library
Website: www.okhahlamba.gov.za

Original Documents should be returned to the Bergville Office no later than 31 August 2025.
Enquiries and comments:
Contact Person: Miss N S Mbhele
Telephone No.: (036) 4488000/8086/8039/8035
Employer: The Municipal Manager
Okhahlamba Local Municipality
P.O. Box 71
BERGVILLE
3350

Appendix 3D:

Site Notice Report

DUNROSE INVESTMENTS 174 (PTY) LTD

FILE REFERENCE NUMBER: KZN30/5/1/2/2/10137 MR

SITE NOTICE REPORT

Environmental Impact Assessment and Environmental Management Programme Report for the proposed mining right application for coal in respect of the remaining extent of portion 1 and remaining extent of the farm Schurfde Poort 1147 GS, the farm Shaws no. 11317 GS, portion 1 and the remaining extent of the farm Gannahoek 1317 GS, portion 1 and the remaining extent of the farm Klip Berg 2158 GT, the farm Brakfontein 1316 GS, portions 1,2 and the remaining extent of the farm Ramak 13696 GT within the administrative district of uThukela / Estcourt, Kwa-Zulu Natal province.

Site notices were distributed at various areas in the administrative district of uThukela on 5 July 2025.

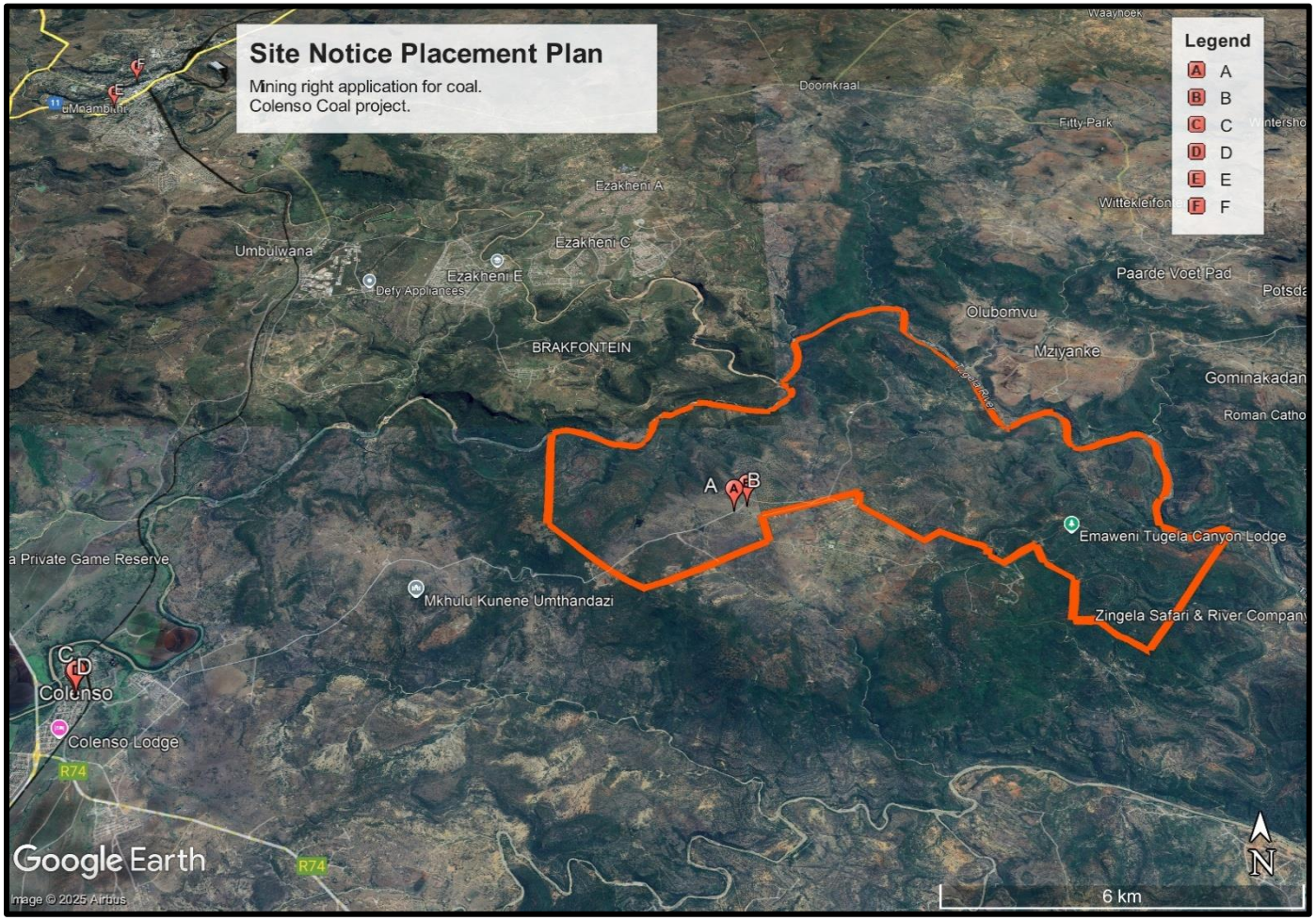


Figure 1: Strategic locations of site notices placement.

Site Notice A	**Kwa Ngcongco's Main Entrance Gate**	

Site Notice B	**Kwa Ngcongco's Place**	

Site Notice C	**Colenso Public Library**	

Site Notice D	**Colenso Public Library**	

Site Notice E	**uMnambithi Library**	

Site Notice F	**uMnambithi Library**	

Appendix 3E:

Proof of consultation with state departments

Conservation Planning: IEM Section

Enquiries: Nerissa Pillay

Ref: KZN30/5/1/2/2/10137 MR
Our Ref.: 14110

Department of Minerals Resources and Energy
Private Bag X 54307
Durban
4000

28 February 2025

ATTENTION: Karoon Moodley

PROPOSED MINING RIGHT APPLICATION FOR COAL ON REMAINING EXTENT OF PORTION 1 AND REMAINING EXTENT OF THE FARM SCHURFDE POORT 1147 GS; THE FARM SHAWS NO.11317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM GANNA HOEK 1317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM KLIP BERG 2158 GT;THE FARM BRAKFONTEIN 1316 GS; PORTIONS 1, 2 AND THE REMAINING EXTENT OF THE FARM RAMAK 13696 GT
District municipality: uThukela
Applicant: Dunrose Investments

Dear Mr Moodley

The Scoping Report (SR) dated January 2025 for the abovementioned application has been reviewed by Ezemvelo KZN Wildlife's IEM Planning Committee (Ezemvelo). Please note that Ezemvelo was not afforded the opportunity to review and comment on the Draft Scoping Report. The current SR was provided to Ezemvelo via an Interested and Affected Party and as such, the report was reviewed within a short time frame.

Notwithstanding the above, based on the information supplied and the interrogation of our biodiversity databases, Ezemvelo acknowledges that the proposed site is modelled to support biodiversity features of conservation significance. The proposed activities will likely result in significant negative impacts on these features, including residual impacts, in the absence of appropriate mitigation measures. It must be noted that given these sensitivities and potential cumulative mining impacts, Ezemvelo is unlikely to support the proposed activities within this site. The applicant is advised to pursue the application as submitted, with risk.

The biodiversity features and their importance are summarised as follows:

a) **Critical Biodiversity Areas (CBAs)**: Categorised as both Irreplaceable and Optimal. Ezemvelo acknowledges that the CBA driving features outlined on pages 54-55 of the SR could be impacted by the proposed mining activities. As such, it is imperative that the CBAs and their driving features be avoided from activities such as those proposed.
b) **Key Biodiversity Areas:** The proposed site supports a Key Biodiversity Area (KBA) known as the Tugela-Bushmans Thornveld. This site qualifies as a KBA of international significance that meets the thresholds for 3 criteria described in the Global Standard for the Identification of KBAs. Based on currently available information, 12 species meet one or more KBAs
c) **Ecological Support Area:** The application area is within an Ecological Support Area (ESA) known as the uThukela local corridor. This feature plays a vital role in connecting Weenen, Spioenkop and Tugela Drift Nature Reserves to the Berg, Chelmsford and Tugela North landscape corridors.
d) **Freshwater Habitats:** The proposed application area is adjacent to and close to National Freshwater Ecosystem Priority Areas (NFEPAs), viz, the Tugela River (Class B: Largely Natural[1]), the Klip River (Class C: Moderately Modified[2]), and NFEPA wetlands.

In light of the above, Ezemvelo recommends the following:

1. The specialist assessments on page 13 of the SR must include the abovementioned features as part of the studies. The assessments must be undertaken by suitably qualified specialists who are registered as Professional Natural Scientists in the appropriate fields of practice that consider key drivers for the biodiversity features, during the appropriate season(s). The studies must be specific to the sensitivity features and comply with the gazetted 2020 assessment protocols[3] for terrestrial biodiversity, aquatic biodiversity, plants, and animals (as appropriate).
2. The specialist studies and sensitivity maps must be informed by Ezemvelo KZN Wildlife's Guideline for Biodiversity Impact Assessments in KwaZulu Natal[4] and Ezemvelo's spatial information. The Ezemvelo data (which includes Systematic Conservation Plans, CBA Maps, Landcover, Vegetation, Protected Areas, and Altitudinal Corridors) can be requested, via data@kznwildlife.com. A shape file of the proposed site must be included in your request.

[1] A small change in natural habitats and biota may have taken place but the ecosystem functions within this river are essentially unchanged.
[2] A loss and change of natural habitat and biota have occurred but the basic ecosystem functions are still predominantly unchanged.
[3] The procedures must be in line with the terms of Sections 24(5)(a) and (h) and 44 of The National Environmental Management Act, 1998.
[4] Ezemvelo KZN Wildlife Guideline: Biodiversity Impact Assessment in KwaZulu Natal. Version 2, February 2013.

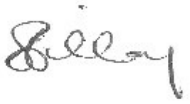
3. The specialist findings for the respective assessments, must be integrated into the Draft Environmental Impact Assessment Report (DEIAR).
4. Should it be determined by the specialists that significant residual impacts are likely to occur, the option of offsets must be investigated.
5. A composite plan of the ecologically sensitive areas (no-go areas) with the localities of the proposed activities, must be included in the DEIAR.

In addition to the above, the application area overlaps with the Emaweni Ranch (ER) and Zingela Safari and River Company (ZSRC) sites. The ER and ZSRC must be included in the public participation process, and the potential mining impacts to these areas must be appropriately assessed.

Please note that this does not constitute Ezemvelo's Final Comment. Final comment will be provided upon receipt and review of the DEIAR which must be provided to Ezemvelo upon availability. Should additional studies be required, we reserve our right to comment.

Should you require any clarity on the points raised above, please do not hesitate to contact our offices.

Yours sincerely



pp.
Manager: Conservation Planning- IEM and PAMP
For CEO: EZEMVELO KZN WILDLIFE
cc: Sunday Mabaso (Vahlengwe Mining Advisory and Consulting)

water & sanitation
Department:
Water and Sanitation
REPUBLIC OF SOUTH AFRICA

Enq: Ms Angela Masefield
File: 16/2/7/V301/D/1
Tel: 083 625 6247
Email: masefielda@dws.gov.za

P.O. Box 1018, Durban, 4000. 88 Field Street, Southern Life Building, Durban, 4001. Tel: (031) 336 2700, Fax (031) 304 9546. www.dws.gov.za

Vahlengwe Mining Advisory and Consulting
238 Voster Ave
Glenvista
Johannesburg South
2190

info@vahlengweadvisory.co.za

Dear Sir

Applicant: DUNROSE INVESTMENTS 174 (PTY) LTD

RE: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT AND ENVIRONMENTAL MANAGEMENT PROGRAMME FOR THE PROPOSED MINING RIGHT APPLICATION FOR COAL IN RESPECT OF REMAINING EXTENT OF THE FARM SCHURFDE POORT 1147 GS; THE FARM SHAWS NO. 11317 GS; PORTION 1 AND THE REMAINING EXTENT OF FARM GANNA HOEK 1317 GS; PORTION 1 AND THE REMAINING EXTENT OF THE FARM KLIP BERG 2158 GT, THE FARM BRAKFONTEIN 1316 GS; PORTIONS 1, 2 AND THE REMAINING EXTENT OF THE FARM RAMAK 13696 GT WITHIN THE ADMINISTRATIVE DISTRICT OF UTHUKELA/ ESTCOURT KWAZULU NATAL PROVINCE. DMRE REF: KZN 30/5/1/2/2/10137 MR

Reference is made to the draft Environmental Impact Report and Environmental Management Programme received by the Department of Water and Sanitation (Department or DWS). The Department **cannot support the submitted application** due to the following issues of concern and/or comments which must be addressed as part of the subsequent environmental process:

1) The Draft Environmental Impact Assessment Report (EIAR) does not appear to acknowledge or assess possible impacts of the mine on the proposed Thukela Water Project, with particular reference to the Jana Dam. The proposed Thukela Water Project has been identified from 1990 onwards as a critical and strategic water resource development project and is considered essential infrastructure for national water security. The absence of any mention of this project, including the Jana Dam, raises concerns regarding the completeness and adequacy of the environmental assessment. Therefore, conclusions drawn in the EIAR regarding environmental sustainability, cumulative impacts, or mitigation measures are incomplete and unreliable.

A more detailed and rigorous assessment is required. This should include a comprehensive evaluation of the potential impacts of the proposed mining activities throughout the life cycle of the mine on the Jana Dam development, as well as the identification and assessment of appropriate mitigation measures.

It is to be noted that potential impacts of the mine extend beyond the proposed dam site and must include the associated transfer infrastructure, such as pipelines, canals, pump stations, and their respective servitudes. These components are integral to the project and must be fully assessed in terms of environmental and regulatory impacts.

The Applicant is referred to the following reports and strategies:

Table 1: Reports and strategies referencing the Thukela Water Project

Date	Description
1993 - 1994	The reconnaissance phase for the Vaal Augmentation Planning Study (VAPS) was initiated to investigate water resource development of the Thukela River Catchment. The findings were that the Tugela-Vaal Transfer Scheme (TVTS) was the most feasible project compared to other options.
1994 - 1996	The Pre-Feasibility Phase of the Vaal Augmentation Planning Study: Tugela-Vaal Transfer Scheme was done. In this phase, the two most attractive schemes were identified. These schemes could provide the water separately or in combination. The Southern Tributary Transfer scheme (STTS) could deliver 12.8 m^3/s and was cheaper than the other option. The findings further indicated uncertainty about the layout of the STTS, and an interim phase was conducted. The interim phase formulated the Thukela Water Project (TWP).
1997 - 2001	The Thukela Water Project Feasibility Study – Feasibility Phase was conducted. The results indicated that TWP was viable from all perspectives (Main Report - V 000/00/9700).
2005	A Decision Support Phase Report PWMA07/V00/001405 was written in support of the Thukela Water Project.
2009	Vaal River System: Large Bulk Water Supply Reconciliation Strategy: Executive Summary - P RSA C000/00/4406/09.The outcome of the Vaal Augmentation Comparison Study led to the decision by the Minister

Date	Description
	of the Department of Water Affairs and Forestry and ratified by Cabinet (in December 2008), to proceed with the negotiations with the Government of Lesotho for the implementation of Phase 2 of the Lesotho Highlands Water Project and place TWP on hold pending further developments.
2010	A Vaal River WRDP: Comparative Study between LHWP Phase 2 and Thukela Water Project (Main Report P RSA C 000/00/12009/1) was conducted.
2013	The National Water Resource Strategy states that "The required additional water (for the Vaal Integrated River system) from the Thukela or Orange Rivers needs to be held in reserve in both these systems."- Annexure A page 2 para (iv) and Annexure A page 11 para (i).
2017	Continuation of the Reconciliation Strategy of the KwaZulu-Natal Coastal Metropolitan Area: Phase 2 – TWP cannot supply Richards Bay. P WMA 4/000/00/3517
2024	According to the Thukela Reconciliation Strategy (DWS, 2024), the whole Thukela Catchment is currently in deficit if the transfer of full allocation for the Integrated Vaal River System (IVRS) is considered. The system is also expected to be in deficit by 378 million m^3/a volume in 2050 after considering all the Ecological Water Requirements (EWR), water transfers to the Integrated Vaal River System (IVRS) and the local water requirements (Report number P RSA 000/00/23121/6/4).

Specific comments related to the impact of the mine on the Thukela Water Project, and the development of the Jana Dam are as follows:

a) Alternatives to current mining application rights and mining methods should be assessed.
b) Geotechnical conditions dictate that slope stability could be an issue and needs to be assessed in detail. Some layers, for example, mudstones, will become unstable once exposed to water and sunlight. Wave actions and or quick drawdowns might induce embankment slippages. This could impact dam stability due to wave action that will cause overtopping of the dam wall when slippage occurs.
c) Compounded impacts due to groundwater and surface water pollution on the proposed Jana Dam, which is caused by mining activities, need to be understood better.

d) It is envisaged that water from the proposed Jana Dam could be transferred to Sterkfontein Dam and/or via the Ingula Pump Storage scheme to the Wilge River. Limnology and ecological consequences assessments must be undertaken to ensure the receiving dam and water course will not be impacted negatively, if pollution in the proposed Jana Dam occurs over a short or long period.

e) If salt loading occurs in the planned Jana Dam as a result of the proposed mining activities, it is essential to thoroughly investigate and understand the potential impacts on the Integrated Vaal River System over time, via the Thukela Water Project Phase 2, as well as any associated costs potentially externalised to the Vaal River water user. This is crucial to prevent unacceptable long-term impacts on the Vaal River water user. It is imperative that the residual costs of the proposed mining venture do not outweigh the short-term benefits.

The Applicant is referred to the following reports:

Table 2: Reports associated with the Integrated Water Quality Management Plan for the Vaal River System

Date	Description
2009	Integrated Water Quality Management Plan for the Vaal River System: • Water Quality Status Assessment - P RSA C000/00/2305/1 • Salinity Balance - P RSA C000/00/2305/2 • Integration of Resource Water Quality Objectives - P RSA C000/00/2305/3 • Water Quality Economic Impact Modelling - P RSA C000/00/2305/4 • Evaluation of Water Quality Management Scenarios - P RSA C000/00/2305/5 • Monitoring Programme - P RSA C000/00/2305/6 • Water Quality Management Strategy - P RSA C000/00/2305/7

f) A Cost-Benefit Analysis and Social Accounting Matrix that compares the value of mining to the proposed Thukela Water Project is expected to be completed.

g) The Department of Forestry, Fisheries and the Environment (DFFE) expects DWS to provide substantial biodiversity offsets when implementing a dam. One method of achieving this is to increase the purchase line of an impoundment and then declare it a nature reserve or establish a stewardship within the same buffer line. Mining activities could sterilise this option

if not provided for in the authorisation.

h) The Thukela Catchment is in a water supply deficit, and new water use licences cannot be issued unless water allocation reform or the proposed dam development takes place. The impact on the groundwater aquifer and other users or potential users must be assessed if the mine intends to use groundwater as a water resource.

2) There are wetlands within the proposed project area. Any activity within a wetland area is undesired because the impact on wetlands is mostly cumulative, with significant consequences. There are indications that the cumulative loss or deterioration of services derived from wetlands is undermining the ability of the affected landscapes to deliver these functions, which in turn has social, economic and ecological implications. Mining requires large land disturbances, directly destroying wetland ecosystems, leading to biodiversity loss and irreversible landscape changes. Other impacts identified include, but are not limited to, the following:

a) During the construction phase, the movement of heavy machinery on site during site clearance and construction, as well as the temporary stockpiling of construction material and possibly soil, could disturb the wetland habitat. Depending on severity, such disturbances could result in the loss or displacement of species and increase the opportunity for invasion by alien vegetation.

b) Vegetation clearing and earthworks during the construction phase of the project will expose the soil on site to erosion, increasing the opportunity for sediment transport into the adjacent wetlands, leading to increased turbidity and altered substrate conditions within these systems with potential deleterious effects on aquatic biota.

c) Spillage of hazardous materials on site during the construction process could lead to water quality deterioration in the adjacent wetland.

d) Mining activities can divert surface water, alter groundwater flow, and change the overall water balance of wetlands, affecting their ecological functions.

e) Therefore, the applicant must note that any development or activity within a 500 meter radius of any wetland/water resource will require a Section 21 (c) and (i) water use licence, i.e. “impeding or diverting the flow of water in a watercourse” and/or “altering the beds, banks, course or characteristics of a watercourse,” respectively, to be applied for under the provision of the National Water Act, Act 36 of 1998 (NWA).

f) If wetlands will be directly or indirectly destroyed or affected, the DWS will also require a wetland offset strategy with secure land tenure for the offset.

g) Furthermore, all wetlands occurring along the proposed project route must be delineated

according to this Department's guideline entitled "A Practical Field Procedure for Identification and Delineation of Wetlands and Riparian Areas (DWAF 2005)." The wetland delineation and assessment study report should detail the following:

i) The number of wetlands delineated.
ii) The type of each wetland delineated.
iii) The Present Ecological Status (PES) and Ecological Importance and Sensitivity (EI/ES) of each delineated wetland.
iv) The impacts identified from the activity to be undertaken.
v) The proposed mitigation measures to reduce/minimise the impacts and the proposed Recommended Ecological Category (REC) post-mitigation.
vi) The percentage of water losses to surface watercourses (rivers and wetlands) and mitigation.

The Bio-Assessment Report is required prior to the initial phase of the project, to provide the Department with a better understanding of the health of the aquatic ecosystem (such as the biota) that will be affected by this proposed activity.

3) The Report does not refer to the Water Resource Classification Study completed for the Thukela catchment or consider how the proposed mine may impact the gazetted Resource Quality Objectives (RQOs), including the Ecological Water Requirements (EWR). Activities such as dewatering may reduce baseflow in rivers and wetlands, affecting aquatic habitats and downstream users as well as the Basic Human Needs component of the Reserve.

4) The Draft EIAR provides insufficient information regarding the referenced power station. It appears that the project was initially described as including a Solar PV plant, yet the current documentation now refers to a coal-fired power station. This significant change in scope must be clearly explained, and its environmental implications comprehensively assessed. The shift from renewable to fossil fuel-based energy is material and may not be acceptable to regulatory authorities.

Furthermore, this change may affect the overall viability of the mine, particularly if authorisations for the power station are not granted. Clarification is also required on whether all necessary Water Use Authorisations (WUAs) for both the mining operations and the power station have been identified and assessed in accordance with the NWA. The absence of this information undermines the completeness of the application.

5) It is unclear whether the number of communities or individuals who rely directly on surface and groundwater resources in the project area has been quantified. A thorough assessment of the potential impacts of the proposed mining activities on these users' water sources is essential and should be explicitly addressed in the Environmental Impact Assessment.

6) Impacts on the geological profile, including disturbed strata, are expected to pose a significant challenge, considering the mining activity will occur at the boundary with the Thukela River, a strategic water resource in the province, and nationally through the water transfer. The potential impact of this in future, considering the effects of climate change, needs to be considered, especially as KwaZulu-Natal is predicted to experience more intense rainfall. Possible flooding and impacts on future dam development need to be considered.

7) Topography plays a considerable role in terms of the mobilisation of contaminants to the water resource. Careful consideration for mine dumps and other mining infrastructure needs to be given.

8) In reference to page 9, it is noted that all surface infrastructures required to undertake the proposed mining operation will be constructed. The Applicant must provide a legible, high-resolution master layout map(s) at an appropriate scale, showing the positioning of all infrastructure (permanent and temporary), including the mining pit, decant points, and acid mine drainage treatment areas. The map must clearly depict all watercourses in and around the site, regulated zones (including scientifically determined buffers and 1:100-year floodlines), and an assessment of the impacts of proposed activities on these watercourses.

9) Page 141 of the report states that *"a WULA has been compiled and submitted to DWS as the decision-making authority in accordance with Section 21 of the NWA. The process has assessed the potential impacts of mining activities on water resources"*. However, no Water Use License Application (WULA) has been received by the Regional DWS Office.

10) In reference to page 10, the Applicant must note that the construction of Pollution Control Dams constitutes a Section 21 (g) water use in terms of the NWA. This must be authorised prior to the commencement of the activity.

11) In reference to page 23, it is noted that water requirements for the operational phase of the mine are still being determined. However, in reference to page 141, it is noted that approximately

70,000 litres of water per day will be required for the operation, and such water will either be sourced from the municipality and transported to the site or extracted from groundwater.

a) Should water be obtained from the municipality, the Applicant will be required to furnish this Department with a written confirmation (i.e. a formal letter with the institution's letterhead) from the municipality confirming the services to be rendered and their sustainability.
b) Should the water be abstracted from a water resource, this use will need to be authorised by this Department in terms of Section 21 (a) of the NWA prior to commencement.
c) The Applicant must specify where such water will be stored.

12) In reference to page 48, it is noted that the floodline study conducted by Isra Consulting stated that the study area is located immediately on the right bank of the Thukela River. Please note that any development within the 1:100-year or even the 1:500-year floodline must be authorised in terms of Section 21(c) and (i) under the provisions of the NWA.

13) The Applicant must note that if one or more of the water uses, as per the NWA, is proposed or currently occurring on a property requires a Water Use Licence, then by default all other water use activities taking place on that property, irrespective if it would be regulated by a General Authorisations (GA) would require that the Applicant applies for a Water Use Licence. An integrated Water Use Licence Application should therefore be submitted to this Office.

14) Furthermore, the Applicant is reminded that the information in this report confirms that this development, parts of it and its infrastructure are located within the regulated area. This project must be authorised by this Department prior to commencement. Therefore, the Applicant is required to apply for a Water Use Authorisation as the activity will not be a permissible water use as stipulated in Section 22 of the NWA.

15) Whilst certain water uses have been identified by the Department within this correspondence, it is the responsibility of the Applicant to identify all water uses applicable to the activity in Section 21 of the NWA and to ensure that all applicable water uses are authorised as such. The Applicant must consult with this Department if clarity is required regarding water uses and water use authorisations.

16) The Applicant is advised to conduct studies, including but not limited to the following:

a) Geohydrological Impact Assessment to evaluate how the mining will affect surface and groundwater flow, recharge, and quality.

b) Subsidence Risk Assessment to predict ground movement that could affect dam foundations since the proposed project will have underground mining activities.
c) Hydropedological Assessment to understand the impacts of mining operations on hillslope hydrology, which could impact the surface and groundwater and vice versa.

17) An Integrated Water and Waste Management Plan must be drawn to detail information such as coal dust suppression, runoff controls and how coal waste will be stored and managed safely near water resources/ bodies.

18) In reference to page 140, there are no specialist studies indicating the acid-producing potential, level of risk and prediction rates of acid mine drainage of the coal that is intended to be mined. This will be an integral aspect of determining the impact of acid mine drainage on surface and groundwater in the proposed mining area. The inclusion of this is to ensure the effects of acid mine drainage on the water resources and aquatic ecosystem are well managed throughout the mine life cycle, as well as during closure and rehabilitation of the mine.

19) Notwithstanding the above, the responsibility rests with the Applicant to identify sources or potential sources of pollution from his undertaking and to take appropriate measures to prevent any pollution of the environment. Failure to comply with the requirements of the NWA could lead to legal action being instituted against the Applicant.

20) The Department acknowledges the following specialist studies:

a) Terrestrial Biodiversity Study.
b) Flood line Study, (further comments will be submitted during the Water Use Licence application process).
c) Aquatic Study, (further comments will be submitted during the Water Use Licence application process).
d) Environmental Noise Impact Assessment.
e) Geotechnical and Seismicity Assessment (Draft), the final report needs to be submitted.
f) Visual Impact Assessment.
g) Traffic Impact Assessment.

21) The current Draft Environmental Management Programme (EMPr) does not provide sufficient detail to allow for a meaningful technical review. The mitigation measures proposed are, in many instances, vague and non-committal. To assess the effectiveness and appropriateness of the

proposed mitigation, the EMPr must clearly articulate how identified impacts will be avoided, minimised, or managed. Aspects to be addressed include, but are not limited to, provision for ablution facilities, storage of hazardous materials, spillages, and soil erosion. Additionally, the development of project-specific plans will be required, e.g. an Environmental Management Plan (EMP), Acid Mine Drainage Treatment Plan, Plant Species Plan, Rehabilitation Plan, and Monitoring and Auditing Plan.

In its current form, the document does not meet the standard required for substantive comment. The Department therefore recommends that a more detailed and comprehensive version of the EMPr be made available in subsequent iterations to enable proper evaluation.

22) This Department reserves the right to request further information from the Applicant, revise or withdraw these comments, and provide additional comments should any other information come to light.

Given the potential impact of the proposed project on strategic water resources, the Applicant is reminded that it is essential that the relevant directorates within the Department are **meaningfully engaged** throughout the environmental authorisation process to provide sufficient opportunity for and secure institutional input. We recommend the provision of physical, hardcopy submissions and conducting in-person meetings and presentations where possible.

Please do not hesitate to call this Office should you have any concerns, comments or queries.

Yours sincerely

MS A MASEFIELD
ACTING HEAD: PROVINCIAL OPERATIONS: KWAZULU-NATAL
DATE:

Cc: Mr Ntsundeni Ravhugoni (ntsundeni.ravhugoni@dmre.gov.za)
Mr Karoon Moodley (karoon.moodley@dmre.gov.za)
Ms Sibongile Mampe (smampe@dffe.gov.za)

KWAZULU-NATAL AMAFA & RESEARCH INSTITUTE

HERITAGE IDENTIFICATION, MANAGEMENT & PROTECTION
Enquiries: Philani Ndabezitha
Email: philani.ndabezitha@amafainstitute.org.za
Tel: 033 394 6543
Date: Friday, 15 August, 2025
Case ID: 25406
Our Ref: SAH25/25406 & 25/028

Proposed Phase 1 Archaeological & Cultural Heritage Impact Assessment for a Mining Right Application on various farms and farm portions situated in the Magisterial District of uThukela/Estcourt,

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Letter

IN TERMS OF SECTION 37 OF THE KWAZULU-NATAL AMAFA AND RESEARCH INSTITUTE ACT (ACT 05 OF 2018)

D.J James c/o Brodsky Trading 266 (Pty) Ltd

P.O BOX 1364

Rayton

1001

Proposed Phase 1 Archaeological & Cultural Heritage Impact Assessment for a Mining Right Application on various farms and farm portions situated in the uThukela District Municipality/ Inkosi Langalibalele Local Municipality, Alfred Duma Local Municipality, kwaZulu-Natal,

The application was considered by the Provincial Heritage Authority, the KwaZulu-Natal Amafa and
Research Institute on 08 June 2025, 16 July 2025.

You are also required to adhere to the below-mentioned conditions with specific mitigation measures applying to specific sites:

- Scatter zones of artefacts, namely Sites 4, 5, 7, 8, 10, 22 are of low value, IIIC, since they are out of context, they were recorded and may be destroyed.

- Site 9, a Late Stone Age site including a livestock pen is of medium to high value, graded as IIIB: this site must be included in the heritage register, it must be fenced off, mapped in detail and a management plan is needed for its long-term protection. This site may not be destroyed.

- Sites number: 11, 13, 14, 15, 16, 17, 18, 19 all include Iron Age Settlement sites of high value IIIA. There are two options for these sites: Firstly, they can be fenced, mapped in detail, and protected by a management plan. Secondly, if mining is going to impact on these sites, a Phase II archaeological permit will be needed for sampling of area by test pits and collecting of artefacts as well as a Phase III archaeological permit will be needed for a full-scale excavation.

- Site 20: This is a more modern or historical settlement including stonewalling and hut floors, after detailed mapping and recording, it can be destroyed. Valued as IIIB.

- Site 21: Recent historical and farming remains, including graves. Graves are valued highly of IIIA significance. There are two options, either these graves must be fenced off and protected with a buffer of 25m or secondly, a permit for excavation and reinterment must be applied for from the KZN Amafa & Research Institute.

- Site 23 is also a very important site, IIIA and it must be mapped in detail, then phase II sampling test pits will need a Phase II permit from Amafa and a full scale excavation, will need a Phase III permit application. There must also be a management plan in place for all sites to be sampled and/or excavated.

CASE CONDITIONS

1.The KwaZulu-Natal Amafa and Research Institute therefore has no objection to the proposed development.

2. You are also required to adhere to the below-mentioned standard conditions:
3. 1. The KwaZulu-Natal Amafa and Research Institute should be contacted if any heritage objects are identified during earth-moving activities and all development should cease until further notice.
4. 2. No structures older than sixty years or parts thereof are allowed to be demolished, altered, or extended without a permit from the KwaZulu-Natal Amafa and Research Institute.
5. 3. Under no circumstances may any heritage material be destroyed, inundated, collected, or removed from site unless under direction of the KwaZulu-Natal and Amafa Research Institute

KWAZULU-NATAL
AMAFA
& RESEARCH INSTITUTE

HERITAGE IDENTIFICATION, MANAGEMENT & PROTECTION
Enquiries: Philani Ndabezitha
Email: philani.ndabezitha@amafainstitute.org.za
Tel: 033 394 6543
Date: Friday, 15 August, 2025
Case ID: 25406
Our Ref: SAH25/25406 & 25/028

and a heritage specialist.

6. 4. Should any remains be found on site that is potentially human remains, the South African Police Service (SAPS) should also be contacted. No SAPS official may disturb or exhume such remains, without the necessary permission from the KwaZulu-Natal Amafa and Research Institute.
7. 5. No activities are allowed within 50m of a site, which contains rock art.
8. 6. Sources of all-natural materials (including topsoil, sands, natural gravels, crushed stone, asphalt, etc.) must be obtained in a sustainable manner and in compliance with the heritage legislation.
9. Failure to comply with the requirements of the National Heritage Resources Act and the KwaZulu-Natal Amafa and Research Institute Act could lead to legal action being instituted against the applicant.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Philani Ndabezitha
Senior Heritage Officer
KwaZulu-Natal Amafa and Research Institute

Amafa Terms & Conditions:
1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to the Institute immediately.

KWAZULU-NATAL
AMAFA
& RESEARCH INSTITUTE

HERITAGE IDENTIFICATION, MANAGEMENT & PROTECTION
Enquiries: Philani Ndabezitha
Email: philani.ndabezitha@amafainstitute.org.za
Tel: 033 394 6543
Date: Friday, 15 August, 2025
Case ID: 25406
Our Ref: SAH25/25406 & 25/028

3. The Institute reserves the right to request additional information as required.

ADMIN:
Direct URL to case: https://sahris.org.za/382437

Appendix 3F:

Interested and Affected Parties Database

NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS
STATE ORGANS				
Reddy J	DWS	Kzn	N/A	reddyj@dws.gov.za
Kobus Bester	DWS	Kzn	0835791680	besterK@dws.gov.za;
Sanet van Jaarsveld	DWS	Kzn	N/A	vanjaarsvelds@dws.gov.za;
Gugu Mazibuko	uThukela District Municipality	Kzn	N/A	Gmazibuko@uthukela.gov.za/ wviljoen@uthukela.gov.za
Mmatlala Rabothatha	DFFE	Kzn	N/A	mrabothata@dffe.gov.za
Lindiwe Dlamini	DFFE	Kzn	N/A	lvdlamini@dffe.gov.za
Nompumelelo	DFFE	Kzn	N/A	nlekalakala@dffe.gov.za
Dominic Wieners	Ezemvelo Wildlife	Kzn	N/A	dominic.wieners@kznwildlife.com

STAKEHOLDERS				
NAME AND SURNAME	**ORGANIZATION/ COMMUNITY**	**ADDRESS**	**CONTACT DETAILS**	**EMAIL ADDRESS**
Inkosi SW Mthembu	Inkosi	Mthembu area	0826629608	mthembu2468@gmail.com
ME Mkhize	Ndlunkulu	Mthembu area	0722957543	buyizcivil@gmail.com
Dudu Mvelase	Qhubeka L. Trust	Ganna Hoek	082 654 0750	N/A
Nompumelelo Mbatha	Qhubeka L. Trust	Ganna Hoek	083 951 8400	mbathan68@gmail.com
Ephrain Ndimande	Qhubeka L. Trust	Ganna Hoek	079 961 3621	N/A
Sekwanele Manzi	Qhubeka L. Trust	Ganna Hoek	072 737 5288	sekwanelejoicemanzi@gmail.com
Thembekile Mvelase	Kwashameni	Kwashameni	073 502 0896	N/A
Zothile Mncube	Kwashameni	Kwashameni	071 660 2807	N/A

INTERESTED AND AFFECTED PARTIES

NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS
Dr. Calverley	Krom poort farm	Krom poort farm	072 215 829	zingelabookings@gmail.com/pongolariverco@gmail.com
Bheki Zwane	Community Member	Ganna Hoek	078 585 3397	zwanebheki070@gmail.com
Fanyana Mokonza	Community Member	Ganna Hoek	076 408 5434	N/A
Mnelisi Mvelase	Community Member	Ganna Hoek	082 9343148	mnelisimvelase70@gmail.com
Dudu Mazibuko	Community Member	Ganna Hoek	N/A	N/A
G I Dludla	Community Member	Ganna Hoek	072 088 7918	N/A
Sizwe Ngcobo	Community Member	Ganna Hoek	072 533 0773	N/A
Bafana Buthelezi	Community Member	Ganna Hoek	073 649 5487	bafanabuthelezi25@gmail.com
Mqpholi Mchunu	Community Member	Ganna Hoek	073 824 8768	N/A
Vumakwakhe Sibisi	Community Member	Ganna Hoek	084 780 7929	N/A
Automan Dubazan	Community Member	Ganna Hoek	082 402 4330	N/A
Bongani Mvelase	Community Member	Ganna Hoek	076 503 0629	N/A
Ntuthuko Ndimande	Community Member	Ganna Hoek	060 386 6125	N/A
Sihle Miya	Community Member	Ganna Hoek	076 339 1439	N/A
Khethani Madondo	Community Member	Ganna Hoek	083 410 5129	N/A
Sithokomelo Khanyile	Community Member	Ganna Hoek	063 780 7121	N/A
Thembi Nkambule	Community Member	Ganna Hoek	082 311 3028	Thembi.N@raumix.co.za
Mzongibandla Mvelase	Community Member	Ganna Hoek	063 040 0129	N/A
M T Dubalane	Community Member	Ganna Hoek	066 420 9684	N/A
SR Xaba	Community Member	Ganna Hoek	078 384 4670	N/A
Mduduzi Dubazane	Community Member	Ganna Hoek	078 074 3198	N/A
Sabelo Zungu	Community Member	Ganna Hoek	072 549 0943	sabelolucky44@gmail.com
N N Khumalo	Community Member	Ganna Hoek	077 476 8692	N/A
Mthobele Dludla	Community Member	Ganna Hoek	072 080 6999	N/A
Mlungisi Mvelase	Community Member	Ganna Hoek	071 211 8943	N/A
Siphamandla Jaba	Community Member	Ganna Hoek	082 238 9916	N/A
Busisiwe Zungu	Community Member	Ganna Hoek	074 652 1265	N/A
Nothile Sibisi	Community Member	Ganna Hoek	082 762 1676	N/A

Zamani Miya	Community Member	Ganna Hoek	079 557 8463	zamanimiya2@gmail.com
Mpilenhle Miya	Community Member	Ganna Hoek	063 630 6191	miyampilenhle@gmail.com
Mvelase Siboniso	Community Member	Ganna Hoek	082 058 9849	N/A
Miya Simiso	Community Member	Ganna Hoek	081 870 4952	N/A
Mvelase Sphamandla	Community Member	Ganna Hoek	072 268 6512	N/A
Miya Qhubekani	Community Member	Ganna Hoek	079 816 2551	qhubekanimiya2017@gmail.com
Mvelase Philani	Community Member	Ganna Hoek	063 1239157	philanimthembu@gmail.com
Mvelase Nathi	Community Member	Ganna Hoek	066 018 4637	mvelasenathi58@gmail.com
Sihle Njoko	Community Member	Ganna Hoek	079 972 3393	
Khulekani Mvelase	Community Member	Ganna Hoek	064 866 4067	khulekanimvelase27@gmail.com
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Mvelo Sithole	Community Member	Ganna Hoek	079 357 4929	N/A
Khethelo Miya	Community Member	Ganna Hoek	072 795 0224	N/A
Sboniso Miya	Community Member	Ganna Hoek	073 852 0241	N/A
Mbuso Miya	Community Member	Ganna Hoek	066 560 2427	miyambusong…hi@gmail.com
ntuthuko Madondo	Community Member	Ganna Hoek	072 884 7852	N/A
SO Miya	Community Member	Ganna Hoek	063 759 7657	N/A
Mcedisi Xaba	Community Member	Ganna Hoek	079 4504 166	N/A
Mhlaliseni Mbatha	Community Member	Ganna Hoek	076 224 9082	N/A
J Ngcongo	Community Member	Ganna Hoek	082 228 1790	N/A
Sabelo Mvelase	Community Member	Ganna Hoek	071 940 5735	N/A
Nkazimulo Dludla	Community Member	Ganna Hoek	082 480 0461	N/A
Nobonelo Mdladla	Community Member	Ganna Hoek	072 7624527	N/A
Philasande Langa	Community Member	Ganna Hoek	079 088 9176	N/A
Nhlonipho Khumalo	Community Member	Ganna Hoek	078 327 8005	N/A
Lindelo Mvelase	Community Member	Ganna Hoek	060 659 3996	N/A
Minnyisi Litshada	Community Member	Ganna Hoek	072 074 2789	N/A
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Funisile Miya	Community Member	Ganna Hoek	079 487 2404	N/A
Zile Madonsela	Community Member	Ganna Hoek	082 061 0061	N/A
Thembelihle Sitlomo	Community Member	Ganna Hoek	060 843 2865	N/A
Nontobeko Mvelase	Community Member	Ganna Hoek	073 827 4293	N/A
Bongiwe Thusi	Community Member	Ganna Hoek	072 474 2035	N/A
Thandazile Madonsela	Community Member	Ganna Hoek	076 046 0863	N/A
Lindelani Sithole	Community Member	Ganna Hoek	076 733 5160	N/A
Thabisile Khumalo	Community Member	Ganna Hoek	066 409 5200	N/A
Tholakale Khumalo	Community Member	Ganna Hoek	079 457 5009	N/A
Nokwanda Mkhize	Community Member	Ganna Hoek	072 999 1551	N/A
Nikwani Mchunu	Community Member	Ganna Hoek	081 810 7061	N/A
Yongesi Madondo	Community Member	Ganna Hoek	060 912 4225	N/A
Deleni Njoko	Community Member	Ganna Hoek	063 714 2140	N/A
Gcinile Mdakane	Community Member	Ganna Hoek	064 784 8524	N/A
Jaheni Sthole	Community Member	Ganna Hoek	079 745 7281	N/A
Hlobisile Mvelase	Community Member	Kwashameni	081 868 1606	N/A
Julisile Miya	Community Member	Kwashameni	076 299 16	N/A
Sholiphi Miya	Community Member	Kwashameni	071 290 2899	N/A
Khohlwayini Miya	Community Member	Kwashameni	065 620 6523	N/A
Precious Kubheka	Community Member	Kwashameni	078 358 8292	preciouskubheka33@gmail.com
Fikile Mvelase	Community Member	Kwashameni	072 069 2557	N/A
Hloniphile Ngcobo	Community Member	Kwashameni	071 371 7894	N/A
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Ncamisile Mtshali	Community Member	Kwashameni	078 715 4598	N/A
Thulisile Dladla	Community Member	Kwashameni	072 088 7918	N/A
Cebisile Sibile	Community Member	Kwashameni	N/A	N/A
Wema Mvelase	Community Member	Kwashameni	N/A	N/A
Mavis Mvelase	Community Member	Kwashameni	N/A	N/A

Lindeni Mina	Community Member	Kwashameni	072 097 9516	N/A
Banisile Mvelase	Community Member	Kwashameni	N/A	N/A
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Sthembiso Miya	Community Member	Ganna Hoek	066 056 1213	N/A
Mncedisi Xaba	Community Member	Ganna Hoek	079 450 4166	N/A
Sthabiso Miya	Community Member	Ganna Hoek	063 759 7657	N/A
Nobuhle Ximba	Community Member	Kwashameni	081 841 2660	N/A
Sanele Gamede	Community Member	Kwashameni	078 389 2468	N/A
Nkululeko Mdlela	Community Member	Kwashameni	073 351 2042	N/A
Mkhuliseni Gamede	Community Member	Kwashameni	079 472 3041	gamedekhula@gmail.com
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Sakhile Gamede	Community Member	Kwashameni	083 593 9579	sakhilesibusisogamede@gmail.com
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Samson Dubazane	Community Member	Kwashameni	079 608 0709	N/A
Shishiva Mdladla	Community Member	Kwashameni	N/A	N/A
Skuta Ngxongo	Community Member	Kwashameni	083 364 1845	N/A
Mnakeni Khumalo	Community Member	Kwashameni	079 793 6602	N/A
Mzameleni Mbatha	Community Member	Kwashameni	079 781 9583	N/A
Senzo Mvelase	Community Member	Kwashameni	083 319 1783	N/A
Reginalol gamede	Community Member	Kwashameni	076 935 7969	reggieskhuthaza81@gmail.com
Mlungisi Duma	Community Member	Kwashameni	066 260 7682	temosocivils@gmail.com
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Nozipho khanyile	Community Member	Gannahoek	073 566 6210	N/A
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Fiyo ZN	Community Member	Gannahoek	072 957 3186	N/A
Sethonywa Miya	Community Member	Gannahoek	071 269 4418	N/A
Dabulamanzi Miya	Community Member	Gannahoek	N/A	N/A
Ntokozo Miya	Community Member	Gannahoek	082 503 9012	N/A
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Thandazile Ngxongo	Community Member	Gannahoek	079 733 3215	N/A
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Lungisile Miya	Community Member	Gannahoek	079 472 2224	N/A
Thembelihle Mvelase	Community Member	Gannahoek	071 564 8841	N/A
Lungile Vilakazi	Community Member	Gannahoek	072 033 5945	N/A
Sebethini Audrey Miya	Community Member	Gannahoek	081 895 2163	N/A
Bekiwe Sithole	Community Member	Gannahoek	076 519 4479	N/A
Mantwa Hadebe	Community Member	Gannahoek	063 176 5607	N/A
Ayanda Miya	Community Member	Gannahoek	079 929 7381	N/A
Luyanda Miya	Community Member	Gannahoek	064 035 7785	N/A
Khanyisile Mvelase	Community Member	Gannahoek	071 295 1407	N/A
Thenjiswa Khumalo	Community Member	Gannahoek	078 000 0148	N/A

Nonzima Buthelezi	Community Member	Gannahoek	064 745 1122	N/A
Nkosingiphile Cebekhulu	Community Member	Gannahoek	071 346 4206	N/A
Fezile Mbele	Community Member	Gannahoek	071 879 2984	N/A
Fikile Mvelase	Community Member	Gannahoek	072 735 5487	N/A
Maria Miya	Community Member	Gannahoek	081 892 1949	N/A
Cebile Mdladla	Community Member	Gannahoek	071 417 1504	N/A
Mtshali Zikhoza	Community Member	Gannahoek	079 661 29	N/A
Bongiwe Mbatha	Community Member	Gannahoek	082 503 7699	N/A
Gcinile Khumalo	Community Member	Gannahoek	071 248 8246	N/A
Sanelisiwe Miya	Community Member	Gannahoek	060 790 8880	N/A
Cashile Ndimande	Community Member	Gannahoek	065 502 0534	N/A
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Similo Dlamini	Community Member	Gannahoek	073 994 4173	N/A
Gani Mvelase	Community Member	Gannahoek	065 599 5570	N/A
Sihle Xaba	Community Member	Gannahoek	066 575 0820	N/A
Kwenza Miya	Community Member	Gannahoek	076 235 6236	N/A
Thandeka Madondo	Community Member	Gannahoek	066 354 9959	N/A
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Thembekile Mvelase	Community Member	Gannahoek	0735020896	N/A
Cash Phi	Community Member	Gannahoek	0788252507	N/A
Sibise Mvelase	Community Member	Gannahoek	0720692557	N/A
Cebisile Miya	Community Member	Gannahoek	N/A	N/A
Gadile Madono	Community Member	Gannahoek	N/A	N/A
Gagayi Ngxongo	Community Member	Gannahoek	N/A	N/A
Njabulo Mabaso	Community Member	Gannahoek	N/A	N/A
Ntuthuko Sithole	Community Member	Ezakheni	0657023065	N/A
Sthenjwa Miya	Community Member	Gannahoek	0712694418	N/A
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Nelisiwe Miya	Community Member	Ezakheni	0721164528	N/A
Bokhojohi Moelase	Community Member	Ezakheni	0792845753	N/A
Khanyile Ndimande	Community Member	Ezakheni	0603866125	N/A
Dabulamzi Miya	Community Member	Gannahoek	0782960945	N/A
Sifiso WW Miya	Community Member	Mnambithi	0734091407	wisymiya@gmail.com
Nduna Miya	Community Member	Ezakheni	0829767598	N/A
Makhosazana Zungu	Community Member	Ezakheni	0838782999	N/A
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Qatom	Community Member	Dubizane	0824024330	N/A
sphamandla Gamede	Community Member	Gannahoek	0797819583	N/A
Khaluza Mbatha	Community Member	Esdakeni	083530509	N/A
Nosipho Khanyile	Community Member	Skhaleni	0735666210	N/A
Thandazile Ngxongo	Community Member	Gannahoek	0797333215	N/A
Vamsile Mbhele	Community Member	Shameni	0722748324	N/A
Sizwe sithole	Community Member	Gannahoek	07229231517	N/A
bheki Kubheka	Community Member	Esdakeni	0762807299	bhekikubheka11@gmail.com
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Sentme Gamede	Community Member	Embizeni	0762262173	N/A
Mncedi Sithole	Community Member	Kwashameni	0665454421	N/A
Nathi Mvelase	Community Member	Kwashameni	0660184637	mvelasenathi58@gmail.com
Tshoko Dubazane	Community Member	Wambisi	0726159048	N/A
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T Dubazane	Community Member	Wembezi	0656802520	N/A
SV Dubazane	Community Member	Wembezi	0617858324	ntselesibusisa@gmail.com
Gqiba Mungwe	Community Member	Gannahoek	N/A	N/A
MS Thole	Community Member	Gannahoek	07228257	N/A
Mpha Moloko	Community Member	Gannahoek	0664976005	N/A
Phumulani Mdladla	Community Member	Gannahoek	0762920239	N/A
Mzungu Bandla	Community Member	Gannahoek	N/A	N/A
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Sarafina Zwane	Community Member	Wembezi	N/A	N/A
Phokisile Mbele	Community Member	Wembezi	N/A	N/A
Sisanda Mdladla	Community Member	Kwashameni	0788238491	N/A
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Amont Mabaso	Community Member	Zakheni	0722948330	N/A
Sphamandla Mvelase	Community Member	Kwashameni	0722686512	N/A
Sphamandla Jaba	Community Member	Kwashameni	07822389916	N/A
Lindelo Zungu	Community Member	Eskhaleni	0723533189	N/A
Mphili Ngxongo	Community Member	usihlalo	0648236676	N/A
BG Miya	Community Member	Gannahoek	0818622677	N/A
ML Dubazanane	Community Member	Wembezi	0827425298	N/A
MA Mvelase	Community Member	Gannahoek	0724570547	N/A
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SI Dludla	Community Member	Ganahoek	0720887918	N/A
ME Dubazane	Community Member	Wembezi	0718252973	N/A
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SV Ngxongo	Community Member	Gannahoek	0824840613	N/A
KA Zwane	Community Member	Gannahoek	0784115625	N/A
SS Zwane	Community Member	Gannahoek	0665750820	N/A
BP Mvelase	Community Member	Gannahoek	0765030629	N/A
Gloria Mbuyisa	Community Member	Embizeni	0676702226	zungusinenhlanhla197@gmail.com
Londelani Sibisi	Community Member	Gannahoek	0636324149	N/A
Ntethelelo Mdakane	Community Member	Gannahoek	0647848524	N/A
Qhubekani Miya	Community Member	Gannahoek	0798162551	qhubekanimiya2017@gmail.com
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Mthunzi Sithole	Community Member	Gannahoek	0726060502	N/A
Moloko Mpha	Community Member	Gannahoek	0669746005	N/A
Smiso Miya	Community Member	Gannahoek	0818704952	N/A
Mhlekhona Mvelase	Community Member	Gannahoek	0797967301	N/A
Xolile Mungwe	Community Member	Gannahoek	0720627890	N/A
Zuzile Nxumalo	Community Member	Eskhaleni	0603104888	zuzilenxumalo98@gmail.com
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Chazile Sthole	Community Member	Kwashameni	0768271018	N/A
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Jingosi Madondo	Community Member	Kwashameni	0609124225	N/A
Fikile Khumalo	Community Member	Kwashameni	0714985758	N/A
Zamile Mvelase	Community Member	Kwashameni	0727612037	N/A
Nokuthula Majozi	Community Member	Kwashameni	0791110291	N/A
Zothile Mvelase	Community Member	Kwashameni	0716602807	N/A
Nakeni Mhlongo	Community Member	Kwashameni	0712163772	N/A
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Xolani Dubazana	Community Member	Kwashameni	0837319546	N/A
David Sthole	Community Member	Kwashameni	0727944503	N/A
Nobuhle Mdldla	Community Member	Kwashameni	0710461944	N/A
Zamisile Ngxongo	Community Member	Kwashameni	0768953220	N/A
Thabani Mvelase	Community Member	Kwashameni	0781360830	N/A

Appendix 3G:

Comments and Response Report

DUNROSE INVESTMENTS 174 (PTY) LTD

COMMENNTS AND RESPONSE REPORT:

DRAFT EIA/EMPr

NAMES	CONSULTATION METHOD	DATE COMMENTS RECEIVED	ISSUES AND/OR COMMENTS RAISED	EAP RESPONSES
Samantha de Villers	Email	27 January 2026	Dear Mr Mabaso I refer to the above application (10137MR). It has been some time since I have received an update on this application. Please kindly advise as to the status of the mining right EA application.	Dear Samantha, Thank you for you for contacting us regarding an update on the Environmental Authorisation application for the proposed mining right. We acknowledge that you were expecting to be notified about the progress of the application. Please be advised that the submission of the Final Environmental Impact Report was delayed as a result of comments received from the Department

			Kind regards	of Water and Sanitation. These comments are currently being addressed. We will ensure that you are notified once the report has submitted and as further updates become available. Thank you for your continued interest in this project. should you have any further questions or require further information, please do not hesitate to contact us. Kind regards,
DFFE	Email	07 September 2025	No response to email.	Dear Mrs M Rabothata and Ms Lindiwe Dlamini, I hope this email finds you well.

				We are conducting second phase of the Environmental Impact Assessment (EIR) for Dunrose Investment 174 (Pty) Ltd, for a mining right of coal in respect of Klipberg 2158 GT, Remak 13696 GT (Roosdal 2176 GT), Brakfontein 1316 GS, Gannahoek 1317 GS, The Shaws 11317 GS, Schufdepoort 1147 GS, in the Magisterial District of Uthukela/Estcourt. Vahlengwe Mining Advisory and Consulting is contracted to facilitate the Environmental Authorisation process. We would like to invite the Department of Forestry, Fisheries and the Environment to review and comment on the EIR in terms of section 24K of the National Environmental Management Act, 1998 (NEMA). We tried to provide the department with the soft copy, but it was too large, therefore, please see the

				link of the of the EIA accessible on https://vahlengweadvisory.co.za/draft-eir-kzn10137mr/ Should you require more information, do not hesitate to contact us. Kind regards,
DWS	Email		No response to email.	Dear Angela Masefield, I hope this email finds you well. We are conducting second phase of the Environmental Impact Assessment (EIR) for Dunrose Investment 174 (Pty) Ltd, for a mining right of coal in respect of Klipberg 2158 GT, Remak 13696 GT (Roosdal 2176 GT),

				Brakfontein 1316 GS, Gannahoek 1317 GS, The Shaws 11317 GS, Schufdepoort 1147 GS, in the Magisterial District of Uthukela/Estcourt. Vahlengwe Mining Advisory and Consulting is contracted to facilitate the Environmental Authorisation process. We would like to invite the Department of Water and Sanitation to review and comment on the EIR in terms of section 24K of the National Environmental Management Act, 1998 (NEMA). We tried to provide the department with the soft copy, but it was too large, therefore, please see the link of the of the EIA accessible on https://vahlengweadvisory.co.za/draft-eir-kzn10137mr/

				Draft EIR KZN10137MR – Vahlengwe Mining Advisory Draft EIR KZN10137MR – Vahlengwe Mining AdvisoryDraft EIAR KZN10137MR DUNROSE 174 PTY LTD Download vahlengweadvisory.co.za Should you require more information, do not hesitate to contact us. Kind regards,
EZEMVELO	Email		Good morning Mulalo, Thank you for your response. I will endeavour to submit the official comments in due course.	Dear Nerissa Pillay, I hope this email finds you well. We are conducting second phase of the Environmental Impact Assessment (EIR) for Dunrose Investment 174 (Pty) Ltd, for a mining

				right of coal in respect of Klipberg 2158 GT, Remak 13696 GT (Roosdal 2176 GT), Brakfontein 1316 GS, Gannahoek 1317 GS, The Shaws 11317 GS, Schufdepoort 1147 GS, in the Magisterial District of Uthukela/Estcourt. We would like to invite Ezemvelo KZN Wildlife to review and comment on the EIR in terms of section 24K of the National Environmental Management Act, 1998 (NEMA). Should you require more information, do not hesitate to contact us. Kind regards,
Ndabezitha Mthembu	Public participation meeting	02 August 2025	We spoke about water scarcity at the previous meeting, and it	I spoke about the Social and Labour Plan, which is one of the mandatory requirements for mining

			was promised that Jojo tanks would be provided as a solution while exploring a long-term sustainable water supply for the communities. The existing boreholes do not supply enough for communities water because the area is very dry.	right application, along with the EMPR, on which we are currently consulting on. SLP promotes development by ensuring that employees have suitable housing and providing training for both employees and the community through bursaries, learnerships, and other forms of training. Artisans will be needed in the mine; therefore, the mine will prioritise artisan training, some of those trained will be hired where possible, whereas others will be able to seek employment elsewhere even start their own work within the communities. Although Local Economic Development benefits everyone, five (5) Jojo tanks will be installed in strategic locations and will be replenished twice a week. Ther's also plans for road extension through the power station SLP since the road will be used by both the mine and the power station.
Mabuyi Mkhize (Ndlunkulu)			I've heard a lot of promisesbefore, when people comeand promise the community great things and	After being approved by the Department of Minerals and Petroleum Resources, the Social and Labour Plan document becomes a public document, allowing the community to hold the

			then disappear, leaving the king to do damage control. Therefore, we request this in writing and the minutes so that we can take it to our lawyer	mine accountable for what they promised. If they do not implement, they can be reported to the department. The SLP should be translated to local language-isizulu in this instance
			Since you indicated that the SLP report is for 5 years and the mine is for 30 years, what will happen after five (5) years?	The mining right application is valid for 30 years, and they can renew it for another 30 years. However, the resources indicates that it can be mined for around 80 years. 15 years is for surface mining. While the SLP is for five years, and thereafter another SLP with a different project should be submitted to the Department, and once approved, it should be made public.
			JoJo tanks are temporary; we seek a permanent solution to the current need.	David Mooney[S1.1] stated that the mine agrees to the request, but it must be approved or implemented together with uThukela District Municipality, which has the mandate to supply water. After issuance of the mining right, an old barrage will be resuscitated to provide clean water, which will also benefit the community since the power plant also requires 80,000 million

				litres per day. The barrage is not afforded by the mining right; it will then be financed by the power plant.
			In the past meeting, we requested for opportunities to be provided by the mine.	Training for skills required will be provided to locals to allow small business to get opportunities from the mine. Some small service providers will be paired with major companies for local training.
			How long will it take for the mine to start operating after acquiring the Environmental Authorisation?	The final EIR/EMPR will be submitted to the DMPR on August 20, 2025, and it will take 106 days to receive the response from the Department. After the EA is granted, it will be advertised for 20 days to appeal, and if everything is in order with the other submitted documents, the department will write a recommendation to the head office in Pretoria for granting of the mining right. The estimate is around April 2026.
Ndonca			I'm covered in a variety of areas. The government has a white paper on the inclusion of individuals with disability.	In terms of the Mining Charter III gazetted in 2018, disability is provided and accounts for 1.5 % of employment equity. Therefore, it is a

			Maybe I didn't hear you mentioning the percentage offered to disabled people. Please check to see if it is included in this project.	requirement to include individuals with disability in the workforce and other opportunities
Bongani Gumede			I work for the mine, and I just knocked off this morning. You, as the community, should be united once the mining company starts operating, and not everyone will be employed; residents should start businesses to benefit meaningfully.	Comment noted and attendees clapped hands for the advice.
Sfiso Miya			The king mentioned our water dilemma. I dislike when individuals make promises without documentation	Comment noted
			When there are projects like this in the community, we	Unity in the community is crucial because division impedes development. For example,

			should be united rather than jealous, because there are those who are already set themselves to benefit alone and they will start engaging the mine for their own benefit.	certain groups may approach the Department of Mineral and Petroleum Resources to express their individual concerns, while those against the mine organize strikes and this compromise full implementation of the SLP and other benefits to community
			Thank you, Ndabezitha, for prioritizing the community with your supporter (Ndlunkulu).	The mine should recruit a community liaison officer (CLO) to ensure that information flows between the community and the mine. The CLO should have a copy of the SLP, which should also be published in the dominant language.
			We should use our minds rather than our emotions	Comment noted
			Those who stand against progress will be sent out	Comment noted
			People are trying to stop people's needs, then we need to explain everything according to our traditions and	Thanks for highlighting this is important because it might impede the mining projects offered to the benefit of the community. Please be united, so the mine can work hand in hand with the community.

			language to them, without fighting. Those who represent the trust, but they said they didn't get anything. Consequently, why do they stop the community progress? Because you were given an opportunity to investigate, now you have nothing on your findings after the investigation, why do you stop the programme? Whom are you working for? While people want progress, you stop it. Voices and needs of the people are very important.	
Sifiso Mvelase			When you said Small, Medium, and Micro Enterprises will have to register in the database, what's going to happen if the mine	Mentorship programme is available under SMME development; if the mine requires specific experience, the company with the most experience will be hired to form a joint venture with a less experienced local company. There is a

			seeks a contractor with particular standards above what we have, and the local company is non-compliant? Will that contract be awarded to an experienced company from outside our area?	Small and Medium Enterprise Development Programme that will prioritise local enterprises; if they cannot find what they are searching for, they will look at the District, Province and country in that order.
Zameleni Mbatha			I commend Mr. Ngqongo's behaviour in guaranteeing the success of this meeting and bringing the chief closer to him.	Comment noted

Appendix 3H:

Public Consultation Documents

PUBLIC MEETING MINUTES

PUBLIC PARTICIPATION PROCESS FOR AN APPLICATION FOR ENVIRONMENTAL AUTHORISATION FOR A MINING RIGHT FOR COAL TO CONSULT DRAFT ENVIRONMENTAL IMPACT REPORT IN TERMS OF REGULATION 41 - 44 OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) READ WITH THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT,1998 (ACT 107 OF 1998) (AS AMENDED) IN RESPECT OF THE REMAINING EXTENT OF KLIP BERG 2158 GT, RAMAK 13696 GT (ROOSDAL 2176 GT), BRAKFONTEIN 1316 GS, HANNA HOEK 1317 GS, THE SHAWS 11317 GS, SCHUFDE POORT 1147 GS: SITUATED IN THE MAGISTERIAL DISTRICT OF UTHUKELA/ESTCOURT, KWAZULU-NATAL PROVINCE.

Date:	02 August 2025
Company:	Dunrose Investments 174 (Pty) Ltd, DMRE Ref No: KZN 30/5/2/2/ 10137 MR
Venue:	Kwa-Ngcongo (Qhubeka Trust)
Time:	11:45 am – 2:10 pm

MEETING AGENDA

1. Opening and Introduction
2. Purpose of the meeting
3. Presentation: Draft EIR/EMPR Report
4. Discussions
5. Closure

1. OPENING AND INTRODUCTION

The meeting was opened by a song and prayer by Miss Dudu Mazibuko as the facilitator of the meeting. King Mthembu observed protocol, greeted, and welcomed all attendees. He emphasized that the meeting would not take long, as it was the second meeting, which would primarily focus on providing feedback on concerns raised during the first meeting. He explained the purpose of the public meeting due to the proposed mining development. He further stated that there is no Induna in the area due to the

internal conflict that intends to prevent the proposed project from being introduced, and the former Induna disrespected the king, but there is a regent.

2. PURPOSE OF THE MEETING

Mr. Sunday Mabaso (EAP) explained in detail the purpose of the public participation meeting was to consult on the draft Environmental Impact Report (EIR) and Environmental Management Programme (EMPr), to also give another chance those who missed the first meeting to register as Interested and Affected Parties (RI&APs), stakeholders, land occupiers with additional findings and recommendations by the specialist studies about the proposed mining project, and to allow them to comment, raise concerns, and to contribute towards the Environmental Impact Assessment process.

3. PRESENTATION

The presentation was delivered in both English and Isi-Zulu by Mr. Sunday Mabaso, with the permission of all attendees.

- Summary: it contained background information of the application area, DMPR reference, Municipality, etc.
- Application area (Regulation 2.2) and locality map: The proposed project site was displayed in maps.
- Mining method: to be employed in this project.
- Land use activities: Current land use on site
- Regulatory Frameworks: Regulatory framework followed to lodge the Environmental Authorisation and the mining right.
- Public Participation Process (PPP): Process followed to undertake PPP, and where and how they can access such information.
- Impact Assessment from specialist studies and mitigation measures: List of specialists undertaken, their findings, and mitigation measures.

4. DISCUSSIONS (Q &A)

The discussion transitioned to an interactive session following the presentation, during which the public was presented with the opportunity to ask questions, make comments, and express their opinions and concerns, send them to the email or SMS to the email address and cell phone number provided by the EAP. These questions will be addressed and included in the Comments Response Report (CRR) to be submitted to the Department of Mineral and Petroleum Resources (DPMR).

Table 1: Discussion

NAME OF THE PARTICIPANT	COMMENTS/ISSUES	RESPONSES
Ndabezitha Mthembu	Thank you for the presentation	Comment noted
	We spoke about water scarcity at the previous meeting, and it was promised that Jojo tanks would be provided as a solution while exploring a long-term sustainable water supply for the communities. The existing boreholes do not supply enough for communities water because the area is very dry.	I spoke about the Social and Labour Plan, which is one of the mandatory requirements for mining right application, along with the EMPR, on which we are currently consulting on. SLP promotes development by ensuring that employees have suitable housing and providing training for both employees and the community through bursaries, learnerships, and other forms of training. Artisans will be needed in the mine; therefore, the mine will prioritise artisan training, some of those trained will be hired where possible, whereas others will be able to seek employment elsewhere even start their own work within the communities. Although Local Economic Development benefits everyone, five (5) Jojo tanks will be installed in strategic locations and will be replenished twice a week. Ther's also plans for road extension through the power station SLP since the road will be used by both the mine and the power station.
Mabuyi Mkhize (Ndlunkulu)	I've heard a lot of promises before, when people come and promise the community great things and then disappear, leaving	After being approved by the Department of Minerals and Petroleum Resources, the Social and Labour Plan

	the king to do damage control. Therefore, we request this in writing and the minutes so that we can take it to our lawyer.	document becomes a public document, allowing the community to hold the mine accountable for what they promised. If they do not implement, they can be reported to the department. The SLP should be translated to local language-isizulu in this instance
	Since you indicated that the SLP report is for 5 years and the mine is for 30 years, what will happen after five (5) years?	The mining right application is valid for 30 years, and they can renew it for another 30 years. However, the resources indicates that it can be mined for around 80 years. 15 years is for surface mining. While the SLP is for five years, and thereafter another SLP with a different project should be submitted to the Department, and once approved, it should be made public.
	JoJo tanks are temporary; we seek a permanent solution to the current need.	David Mooney stated that the mine agrees to the request, but it must be approved or implemented together with uThukela District Municipality, which has the mandate to supply water. After issuance of the mining right, an old barrage will be resuscitated to provide clean water, which will also benefit the community since the power plant also requires 80,000 million litres per day. The barrage is not afforded by

		the mining right; it will then be financed by the power plant.
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	How long will it take for the mine to start operating after acquiring the Environmental Authorisation?	The final EIR/EMPR will be submitted to the DMPR on August 20, 2025, and it will take 106 days to receive the response from the Department. After the EA is granted, it will be advertised for 20 days to appeal, and if everything is in order with the other submitted documents, the department will write a recommendation to the head office in Pretoria for granting of the mining right. The estimate is around April 2026.
Ndonca	I'm covered in a variety of areas. The government has a white paper on the inclusion of individuals with disability. Maybe I didn't hear you mentioning the percentage offered to disabled people. Please check to see if it is included in this project.	In terms of the Mining Charter III gazetted in 2018, disability is provided and accounts for 1.5 % of employment equity. Therefore, it is a requirement to include individuals with disability in the workforce and other opportunities.

Bongani Gumede	I work for the mine, and I just knocked off this morning. You, as the community, should be united once the mining company starts operating, and not everyone will be employed; residents should start businesses to benefit meaningfully.	Comment noted and attendees clapped hands for the advice.
Sfiso Miya	The king mentioned our water dilemma. I dislike when individuals make promises without documentation.	Comment noted
	When there are projects like this in the community, we should be united rather than jealous, because there are those who are already set themselves to benefit alone and they will start engaging the mine for their own benefit.	Unity in the community is crucial because division impedes development. For example, certain groups may approach the Department of Mineral and Petroleum Resources to express their individual concerns, while those against the mine organize strikes and this compromise full implementation of the SLP and other benefits to community.
	Thank you, Ndabezitha, for prioritizing the community with your supporter (Ndlunkulu).	The mine should recruit a community liaison officer (CLO) to ensure that information flows between the community and the mine. The CLO should have a copy of the SLP, which should also be published in the dominant language.
	We should use our minds rather than our emotions	Comment noted
	Those who stand against progress will be sent out	Comment noted

	People are trying to stop people's needs, then we need to explain everything according to our traditions and language to them, without fighting. Those who represent the trust, but they said they didn't get anything. Consequently, why do they stop the community progress? Because you were given an opportunity to investigate, now you have nothing on your findings after the investigation, why do you stop the programme? Whom are you working for? While people want progress, you stop it. Voices and needs of the people are very important.	Thanks for highlighting this is important because it might impede the mining projects offered to the benefit of the community. Please be united, so the mine can work hand in hand with the community.
Sifiso Mvelase	When you said Small, Medium, and Micro Enterprises will have to register in the database, what's going to happen if the mine seeks a contractor with particular standards above what we have, and the local company is non-compliant? Will that contract be awarded to an experienced company from outside our area?	Mentorship programme is available under SMME development; if the mine requires specific experience, the company with the most experience will be hired to form a joint venture with a less experienced local company. There is a Small and Medium Enterprise Development Programme that will prioritise local enterprises; if they cannot find what they are searching for, they will look at the District, Province and country in that order.
Zameleni Mbatha	I commend Mr. Ngqongo's behaviour in guaranteeing the success of this meeting and bringing the chief closer to him.	Comment noted

5. CLOSURE.

King Mthembu thanked everyone for a successful meeting and attendance, noting that the meeting almost did not take place due to a threat of arrest if they proceeded with it. King Mthembu praised Mr Sunday Mabaso on the low level of interaction, implying that the response was adequate. He also stated that he hopes the mining company will prioritize benefitting the community. He went on to say that, as previously stated, mining corporations hire contractors and bring their people from other locations. At 14:10, Ndlunkulu concluded and closed the meeting with a prayer.

VAHLENGWE MINING ADVISORY AND CONSULTING
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***E-mail*: info@vahlengweadvisory.co.za**

ATTENDANCE REGISTER

PUBLIC PARTICIPATION PROCESS OF AN APPLICATION FOR AN ENVIRONMENTAL AUTHORISATION (EA) IN TERMS OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS, 2014 (AS AMENDED) READ WITH NATIONAL ENVIRONMENTAL MANGEMENT ACT,1998 (AS AMENDED) FOR A MINING RIGHT APPLICATION FOR COAL IN RESPECT OF THE REMAINING EXTENT OF KLIP BERG 2158 GT, RAMAK 13696 GT (ROOSDAL 2176 GT), BRAKFONTEIN 1316 GS, GANNAHOEK 1317 GS, THE SHAWS 11317 GS, SCHURFDE POORT 1147 GS, SITUATED IN THE MAGISTERIAL DISTRICT OF UTHUKELA/ ESTCOURT, KWAZULU-NATAL PROVINCE.

Public Participation Meeting:

Company: Dunrose Investments 174 (Pty) Ltd

DMRE Reference: KZN 30/5/2/2/ 10137 MR

Venue: Kwa-Ngqongo (Qhubeka Trust), Gannahoek

Date: 17/01/2025

Time: 11:00 am

DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS

DRAFT EIR/EMPr

DMRE REFERENCE: KZN 30/5/2/2/ 10137 MR

VAHLENGWE MINING ADVISORY AND CONSULTING

Address : 238 Voster Ave,
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FEZILE MBELE	KwaShameni	KWASHAMENI	071 879 2984	Fezile Mbele 12 gmail.com	F.S Mbele
Nothile Zungu	Esikhaleni	Esikhaleni	0827621676	sabeloluckyu4@gmail.com	[signature]
Siněmř Gamede	Embizini	Embizini	0762262173	Embizini	[signature]
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Aug-25				info@vahlengweadvisory.co.za	

DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS

DRAFT EIR/EMPr

DMRE REFERENCE: KZN 30/5/2/2/ 10137 MR

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NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS	SIGNATURE
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Khethelo Miya	Gannahoek	Gannahoek	0727950224	–	km.miya
ms [illegible]	GannHuk		07228257		[illegible]
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Makhosi Khumalo	Wembezi	2251 Mahhashini	0729237573	Macocy83	[illegible]
Sarafina Zwane	Wembezi				SS
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DUNROSE INVESTMENTS 174 (PTY) LTD

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DMRE REFERENCE: KZN 30/5/2/2/ 10137 MR

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Mzwenkanyi Mshengu	Uthukela Development Agency	Colenso	0749381396	ernestmmshengu24@gmail.com	[signature]
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Shabonga Mncwango	Ezakheni	A687 Ezakheni	0645213703	mncwango@gmail.com	[signature]
SiGuGulaGamede	EZAKheni	EZAKheni	0726534798	siGuGula@GMAIL.com	[signature]
Mandi Miya	Colenso	Colenso	0826800252	miyamandi@gmail.com	[signature]
Qiniseka Bivela	Colenso	Colenso	076433191	N/A	[signature]
AMONT MABASO	ZAKHENI	635	0722948330	N/A	[signature]
Siphamandla Muzlase	Kwashameni	Colenso	0722686512	N/A	[signature]
Sphamandla Joba	Kwashameni	Gannahoek	0822389916	N/A	[signature]
Sizwe Ngcobo	Kwashameni	Gannahoek	0725033773	N/A	[signature]
Lindelo Zungu	Esikhaleni	Colenso	0723533189	N/A	L.S.Zungu
Phikile Miya	Gannahoek	Gannahoek	0607069780	miyapinky01@gmail.com	[signature]
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Aug-25				info@vahlengweadvisory.co.za	

DUNROSE INVESTMENTS 174 (PTY) LTD

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DMRE REFERENCE: KZN 30/5/2/2/ 10137 MR

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Mbali Nxumalo		Esikhaleni	0606244739	Mbalieyno2@gmail.com	[signature]
Lungisile Miya		KwaShameni	0794722224	"	L.A Miya
Fundisiwe Dubazana		KwaShameni	0648549387		F.Dubazana
Thokozile G. Mbatha		KwaShameni	0634974469		T.Mbatha
Precious Kubheka Dubazana		KwaShameni	0769443209	preciouskubheka33@gmail.com	[signature]
Ayanda Miya		KwaShameni	0799297381		A.B.Miya
Julisile Miya		KwaShameni	0762991601	"	J.Miya
Cheziwe Sithole		KwaShameni	0768271618		C.Sithole
Dumsile Sithole		KwaShameni	0837607049	Nompumelelodumisilesithole@gmail.com	[signature]
Lindelani Sithole		KwaShameni	0767335160	lindisithole@gmail.com	[signature]
Thandazile Madonsela		KwaShameni	0648613506		T.T Madonsela
Jabeni Sithole		KwaShameni	0797457281		J.N Sithole
Nonzima Buthelezi		Kwashameni	0647451122		N.Buthelezi
Jinyosi Madondo		Kwashameni	0609124225		J.M
Fikile Khumalo		Kwashameni	0749857758		[signature]
Zamile Mvelase		Kwashameni	0727612037		[signature]
C Aug-25				info@vahlengweadvisory.co.za	

DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS

DRAFT EIR/EMPr

DMRE REFERENCE: 30/5/2/2/ 10137 MR

VAHLENGWE MINING ADVISORY AND CONSULTING

Address: 238 Voster Ave,
Glenvista, 2058
Tel: +27 11 432 0062

NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS	SIGNATURE
Casuile Nelmande		Kwashameni	065 5020 534		cnelmande
Nokuthula Majozi		Kwashameni	0781110291		N.M
Zothile Mvelibe		KwaShameni	0716602807		Z.M.
Nakeni Mhlongo		Kwashameni	0712163772		N M
Bongiwe Mbatha		Kwashameni	0925037699		
Nkosingiphile Cebekhulu		kwashameni	0718464206		N.J Cebekhulu
Thulile Gwala		KwaShameni	0787242762	thulile19@gmail.com	
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Ayakhula Mbatha		Kwa Shameni	079 6782286	ayakhulasharelu 7@gmail.com	
Xolani Dubazana		KwaShameni	0837319546		
David Sthole		KwaShameni	0727944503		
Nombulelo Mvelase		Kwashameni	0739307403	mvelasenombu@gmail.com	N. Mvelase
Ncamisile Mtshali		Kwashameni	0787154598		N.J. Mtshali
Nosihle Mdladla		KwaShameni	0710461944		N N Mdladla
Zamisile Ngxongo		KwaShameni	0768953220		Z M Ngxongo
Cebile Mdladla		KwaShameni	0714171504		C Mdladla
THABANI MVELASE Aug-25		KWASHAMEMI	0781360830	info@vahlengweadvisory.co.za	

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NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS	SIGNATURE
Mhlaliseni Mbatha	Community Member	Gannahoek	076 224 9082	N/A	M.B.A
EPHRAIM NDIMANDE	Community Trust	"	0799613621	N/A	[illegible]
Mqaphelo Nkhumu	Community Member	Gannahoek	0738248768	N/A	[illegible]
Jabezinkosi Mabaso	Community Member	Gannahoek	0782037004	N/A	J.N.Mabaso
Nhlokozo Miya	Community Member	Gannahoek	0825039012	N/A	[illegible]
Thulisile Dladla	Community	Gannahoek	0720887618	N/A	T.M.Dladla
Thembekile Mvelase	Community	GANNAHOEK	0735020896	N/A	T.M.Mvelase
Cashephi Jwara	Gannahoek	Gannahoek	0788252507		
Zibile Mvelase	Gannahoek	G Gannao	072 069 2557	N/A	
Hloniphile Ncobo	Gannahoek		071 371 7894	N/A	
Mavis Mvelase	Gannahoek	Gannahoek			Mvelase
Maria Mvelase	Gannahoek	Gannahoek			+
Cebisila Miya	Gannahoek	Gannahoek			+
Gadlile Madono	Gannahoek	Gannahoek		N/A	+
[illegible] Nxongo					[illegible]
Njabulo Mabaso	Gannahoek	Gannahoek	0795318820	N/A	[illegible]
Thulani MABASO	Esdakeni	Esdakeni	076 020 8153	thulaniimabaso@gmail.com	[illegible]
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DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS

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NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS	SIGNATURE
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F. MNTUNGWA	chiefs office		0810274698	FQNZ9MNtungwa@gmail.com	[illegible]
M.J. Mkhonza	Community		0725941982		[illegible]
S. Mntungwa	Chiefs office		0768693639	Mzwandile[illegible]@gmail	[illegible]
N.P. Dubazane	Ganhoek		0766179023	[illegible]	[illegible]
G.E Mbelase	Gannahoek		0655995570	Ganieliasq@gmail.com	
Mabhija Mvelase	Gannahoek		0829789814	egon[illegible]	me
Ntokozo Miya	Wembezi		0782982384	Miya D.N [illegible] gmail	[illegible]
Nelisiwe Miya	Ezakheni		0721164528	Miya N	[illegible]
Bukhosi[illegible] Mbelase	Ezakheni		0792845753	B.C.M.	
Khanyile Ndimande	Ezakheni		0603866125	K.D.	K.D Ndimande
Dabulamanzi Miya	Gannahoek		0782960945	N/A	X
Sifiso W.W. Miya	Mnambithi		0734091407	wisymiya@gmail.com	[illegible]
Nsuna Miya	Ezakheni		0829767598	N/A	N.MIYA
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Wandile Mbele	Ezakheni		0655326858	mbhelewandile00@gmail.com	[illegible]
[illegible]	Dubazane		0824021430	ce	
Senzo Mvel Aug-25				info@vahlengweadvisory.co.za	

DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS
DRAFT EIR/EMPr
DMRE REFERENCE 30/5/2/2/ 10137 MR

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Tel: +27 11 432 0062

NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS	SIGNATURE
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Zamani Miya	GannaHoek	"	0795578465	N/A	
Ntuthuko Madondo	GannaHoek		0728547852	N/A	
Sikuta	IIGXONGO	"	0833541845	"	SS
Mzamekeni Mbatha	GANNA HOEK		0798195883	"	
Sphamandla Gamede	eSdakeni	"	0730067292	N/A	
Sanele Gamede	eSdakeni		0733892468	N/A	
Khaliza Mbatha	esdakeni		033 5430509		
NOZIPHO KHANYILE	SKHALENI		0735666210	N/A	N.L Khanyile
Thandazile NGXONGO	GANNAHOEK	"	0797333215	N/A	T.Ngxongo
Vamsile Mbele	Shameni		0729748324		V.m
sizwe	Sthole		0722923517		
Bheki KUBHEKA	eSDAKENI		0762807299	bhekikubheka11@gmail.com	
Lungani Gamede	Embizeni		0784392720	lungani Gamede4@gmail.com	
Zuthu Gamede	eSdakeni/Embizeni		083 6455429		Zuthu
Egnatia Ngxongo	GannaHoek	GannahHoek	0625213131		
Mintwa HADEBE	Shameni		066 456 4262		M.S.H
Yamkela Miya			078 351 3777		Y. M.
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DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS
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DMRE REFERENCE: KZN 30/5/2/2/ 10137 MR

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K.A Zwane		GANNA Hoek	0784115625	//	
S.S. Zulu	usihlalo	GANNA Hoek	0665730820	//	
B.P. MVELASE		GANNAHOEK	0765030629	//	
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DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS

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Mthunzi Sithole	Community	Gannahoek	072 606 6502		
Moloko Mpha	-	Cappyhoek	0669746005	-	-
Smiso Miya	Gannahoek	Colenso	0818704952		S.Miya
Phumlani Mlelaelle	Gannahoek	Colenso	076 292 0239	-	
David Mooney	Dunrose	Pretoria	0814449932	dgmooney@gmail.com	
Sunday Mabaso	Vahlengwe	238 Vorster.	0745697312	sunday@vahlengweadvisory.co.za	M.Mwelase
Mhlekhona Mvelase	Gannahoek	Gannahoek	0797067301		M.Mwelase
Gloria Mbuyisa	Elcort	BRYNBELLA	0607517665	067 6702226	
Bhekokwakhe Miya	Gannahoek	Gannahoek Area	082 846 2593	miyathokoza36@gmail	B.
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DUNROSE INVESTMENTS 174 (PTY) LTD

PUBLIC PARTICIPATION PROCESS
DRAFT EIR/EMPr
DMRE REFERENCE: kzn 30/5/2/2/ 10137 MR

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NAME AND SURNAME	ORGANIZATION/ COMMUNITY	ADDRESS	CONTACT DETAILS	EMAIL ADDRESS	SIGNATURE
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Aug-25				info@vahlengweadvisory.co.za	

PUBLIC PARTICIPATION MEETING FOR THE ENVIRONMENTAL IMPACT ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PROGRAMME

APPLICANT: DUNROSE INVESTMENTS 174 (PTY) LTD.
DMPR REFERENCE NUMBER:KZN30/5/1/2/2/10137 MR
MINING RIGHT APPLICATION
02 AUGUST 2025

AGENDA

1. Opening and Introduction
2. Purpose of the Meeting
3. Presentation: Draft EIA and EMPr
4. Discussions
5. Closure

TEAM

1. Sunday Mabaso (Registered EAP)
2. Dimakatso Leholi (Candidate EAP)
3. Lusizo Nqasha (GIS)
4. Mulalo Mafunisa (Stakeholder Engagement Consultant)
5. Mitshelo Tshifhango (Candidate Scientist SACNASP)

VAHLENGWE MINING ADVISORY AND CONSULTING

SUMMARY

- Dunrose Investment holds a Prospecting Right in terms of Section 16 of the MPRDA which was issued on and an Environmental Authorisation.

- The aim of the prospecting was to explore for anthecite coal in the KZN area, which then led to a viable mine.

- Dunrose therefore decided to apply for a Mining Right in the InkosiLangalibalele Local Municipality Ward 20, uThukela Magisterial District within several farms and portions.

- The duration of the mining right will be for 20 to 30 years; the extension will be determined by the Life of Mine.

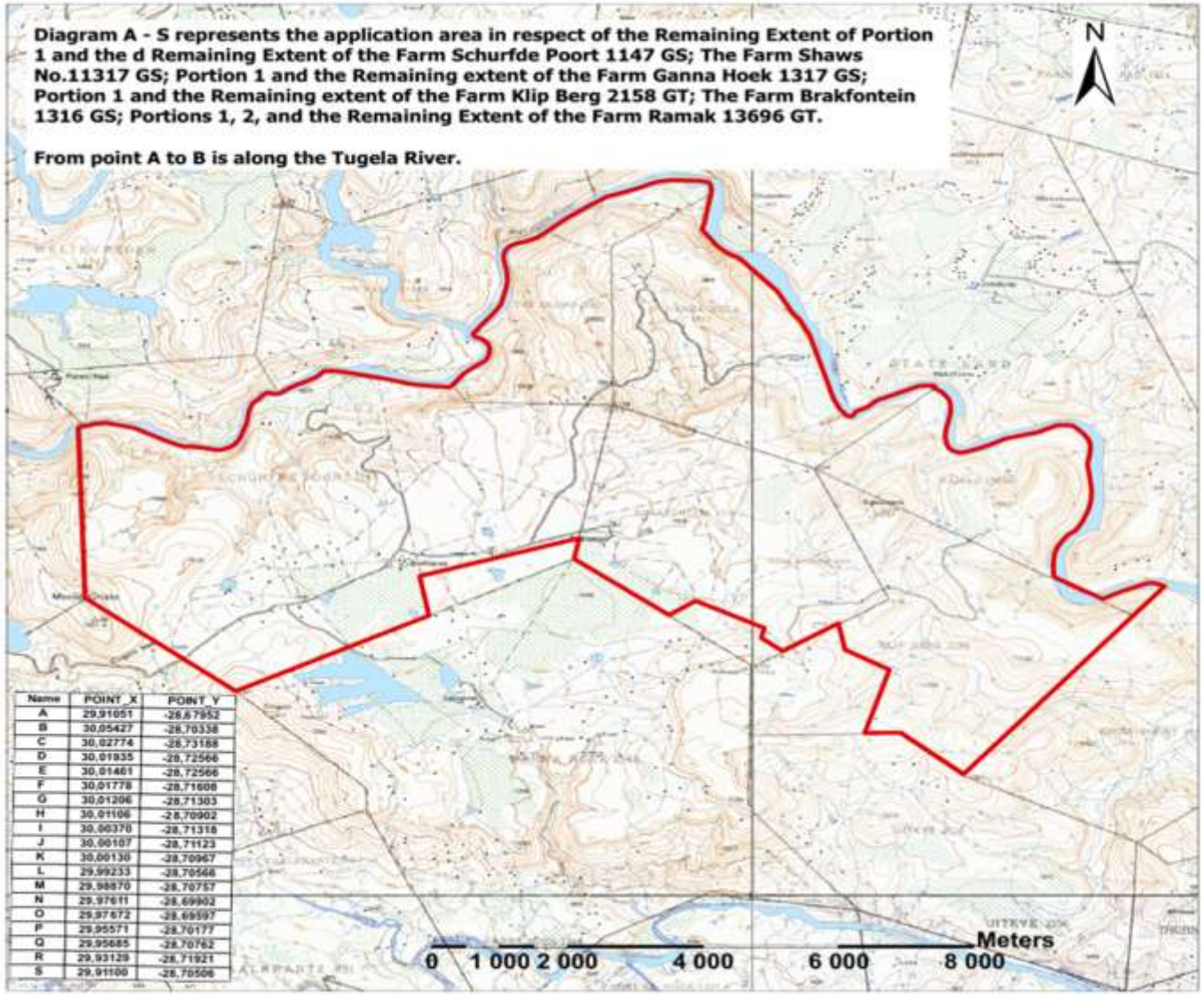
- The mining method to be implemented is the Highwall Mining System for the first 15 years, and the subsequent 15 years will use underground mining.

- The area covers an area extent of 6 333, 2240 ha.

PROJECT DESCRIPTION

Farm Name	Portion Number
Schurfde Poort 1147 GS	Remaining Extent
	Portion 1
Shaws No. 11317 GS	Farm
Ganna Hoek 1317 GS	Portion 1
	Remaining Extent
Farm Klip Berg 2158 GT	Porton 1
	Remaining Extent
Brakfontein 1316 GS	Farm
Farm Ramak 13696 GT	Portion 1
	Portion 2
	Remaining Extent

APPLICATION AREA



Name	POINT_X	POINT_Y
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B	30,05427	-28,70338
C	30,02774	-28,73188
D	30,01935	-28,72566
E	30,01461	-28,72566
F	30,01778	-28,71608
G	30,01206	-28,71303
H	30,01106	-28,70902
I	30,00378	-28,71318
J	30,00107	-28,71123
K	30,00130	-28,70967
L	29,99233	-28,70566
M	29,98870	-28,70757
N	29,97611	-28,69902
O	29,97672	-28,69597
P	29,95571	-28,70177
Q	29,95685	-28,70762
R	29,93129	-28,71921
S	29,91100	-28,70506

Dunrose Investment 174 (PTY) Ltd

REGULATION 2 (2)
THE APPLICATION OF THE MINING RIGHT OF THE SECTION 22 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT (MPRDA) (ACT 28 OF 2002)

Application Extent: 6 333, 2240 ha

Legend

- Points location
- Mining Right Area

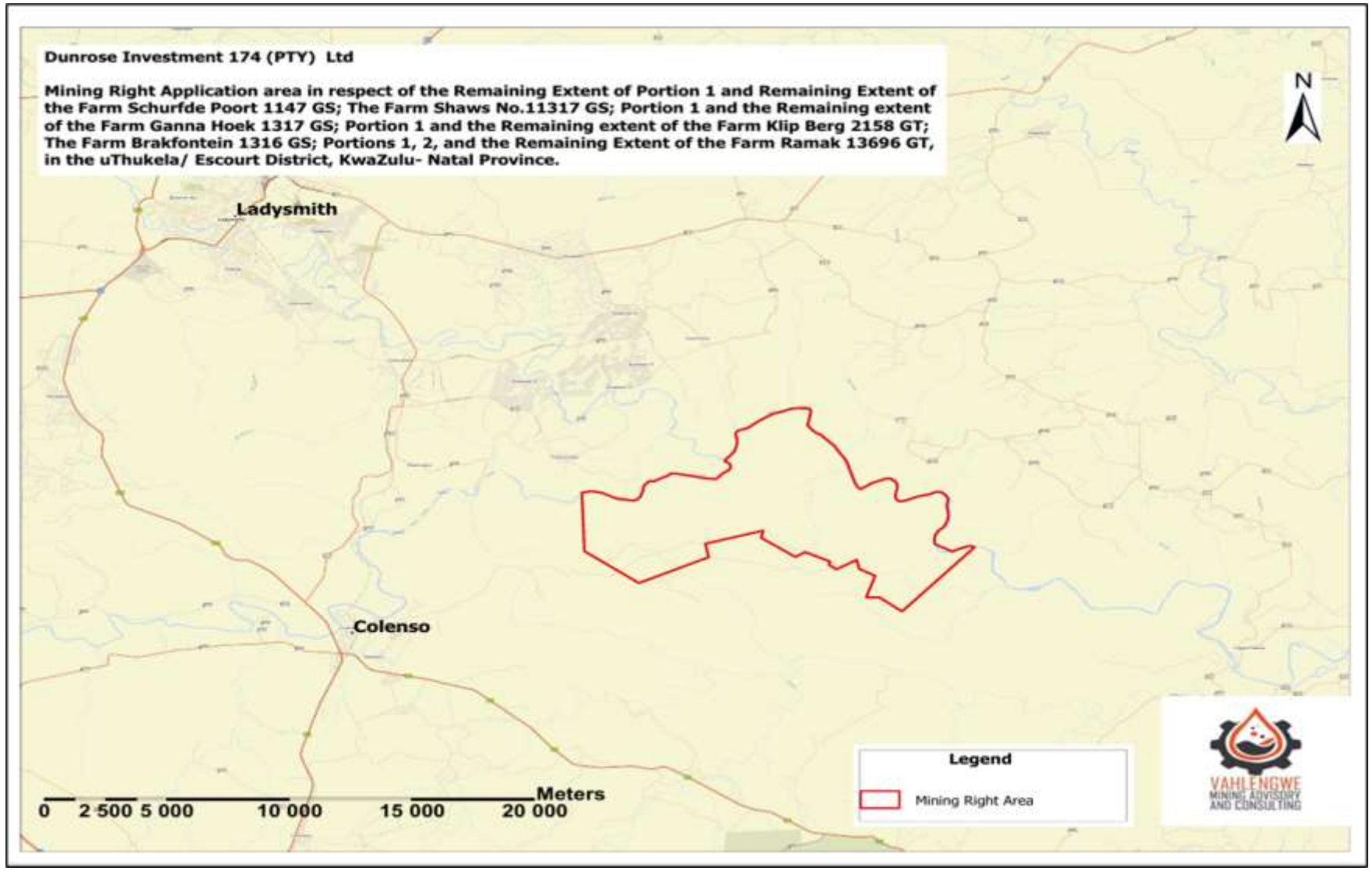
Plan Approval
Applicant
Signature:.....
Date:.....
Surveyor
Signature:.....
Date:.....
Regional Manager
Signature:.....
Date:.....

PREPARED BY

LIABILITY CLAUSE:
This map was compiled from a variety of data sets and Vahlengwe Advisory does nor accept any responsibility for the accuracy of the data.

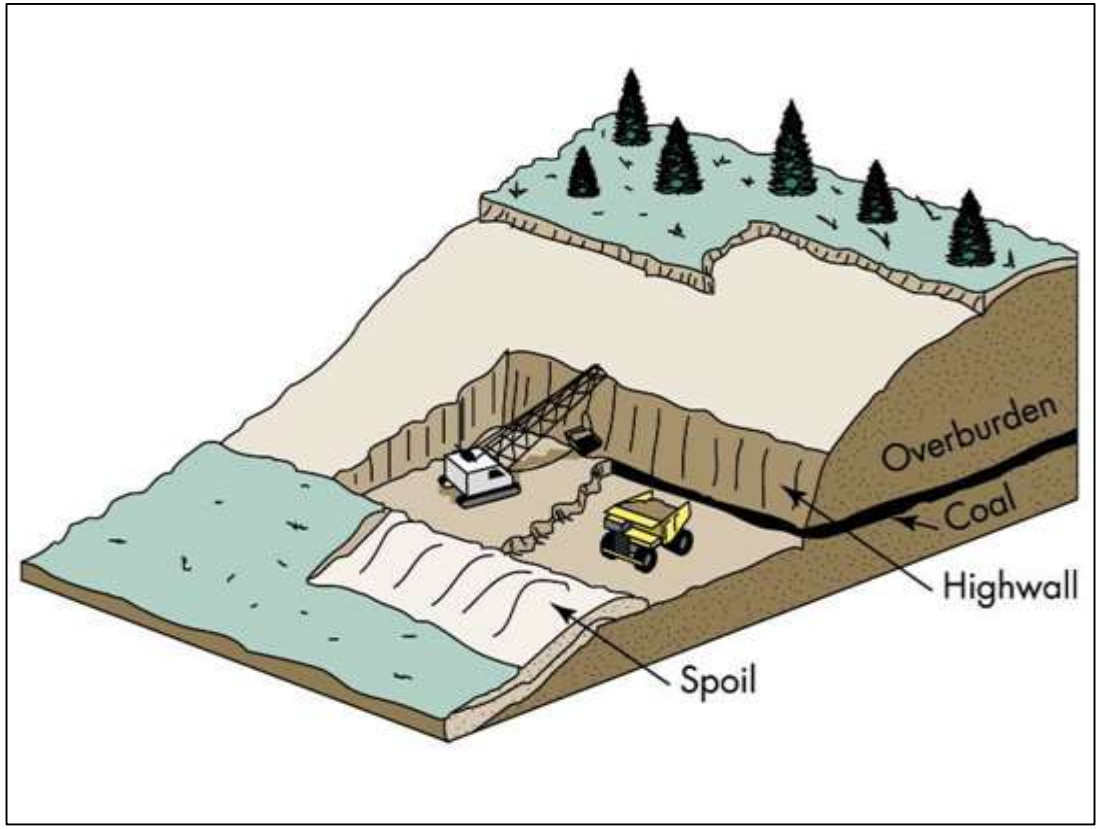
Coordinate System: WGS 84

LOCALITY MAP



MINING METHOD

Highwall mining is a surface-based coal extraction method designed to recover coal seams that are uneconomical to mine by traditional open-pit methods due to increasing overburden thickness, or structurally complex for conventional underground mining in the initial stages of the project.



LAND USE ACTIVITIES

Livestock grazing, wildlife browsing, residential, game farming, agriculture and tourism.

REGULATORY FRAMEWORKS

- Application: Mining right in terms of Section 22 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) (as amended) (MPRDA).

- Environmental Authorization in terms of Sec. 24 of NEMA, 1998 (Act 107 of 1998)(as amended).

- GN R 984 (Listing Notice No. 2); Activity 17: Any activity including the operation of that activity which requires a mining right in terms of section 22 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice, in Listing Notice 1 of 2014 or Listing Notice 3 of 2014, required to exercise the mining right.

- Associated activities: The National Environmental Management Act and Environmental Impact Assessment (as amended in 2017) (Listing Notice No. 2)

PUBLIC PARTICIPATION PROCESS

- The purpose of the public consultation process is to enable landowners or lawful occupiers of the land and stakeholders including the Interested and Affected Parties (I&APS) to raise any issues, concerns, and or comments regarding the mining activities incorporated into the final EIA & EMPr.

- A Background Information Document (BID) including a registration form, handed and distributed to the uMnabithi Library in Ladysmith, Langalibalele Municipality in Estcourt, uThukela District Municipality Office in Ladysmith, and the headman (induna, Mr Nqongo) of the area.

- Draft EIR& EMPr were hand delivered to uMnambithi Library, Colenso Library on 5 July 2025.

- Site notices placed at the project site and strategic locations visible to the public to the public on 5 July 2025.

- Newspaper advertisement on Ladysmith Gazette Newspaper on 5 July 2025.

- A public participation meeting will be held on the 2nd of August 2025 at Ganna Hoek, KwaNgcongco Place.

- An electronic copy of the draft EIR & EMPr was made available on 7 July 2025.

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NOTICES

DUMROSE INVESTMENTS 174(PTY) LTD

ALFRED DUMA LOCAL MUNICIPALITY
NOTICE TO THE PUBLIC -
COUNCIL AND MUNICIPAL PUBLIC ACCOUNTS COMMITTEE (MPAC) MEETINGS
JULY 2025 TO JUNE 2026

EXTERNAL NOTICE NO. 51/2025

OKHAHLAMBA

PUBLIC NOTICE

APPLICATIONS FOR INDIGENT SUPPORT, DISCOUNT ON ADVANCE PAYMENT, PENSIONER'S AND DISABLED OWNERS REBATE & ARRANGEMENT FOR DEBT SETTLEMENT

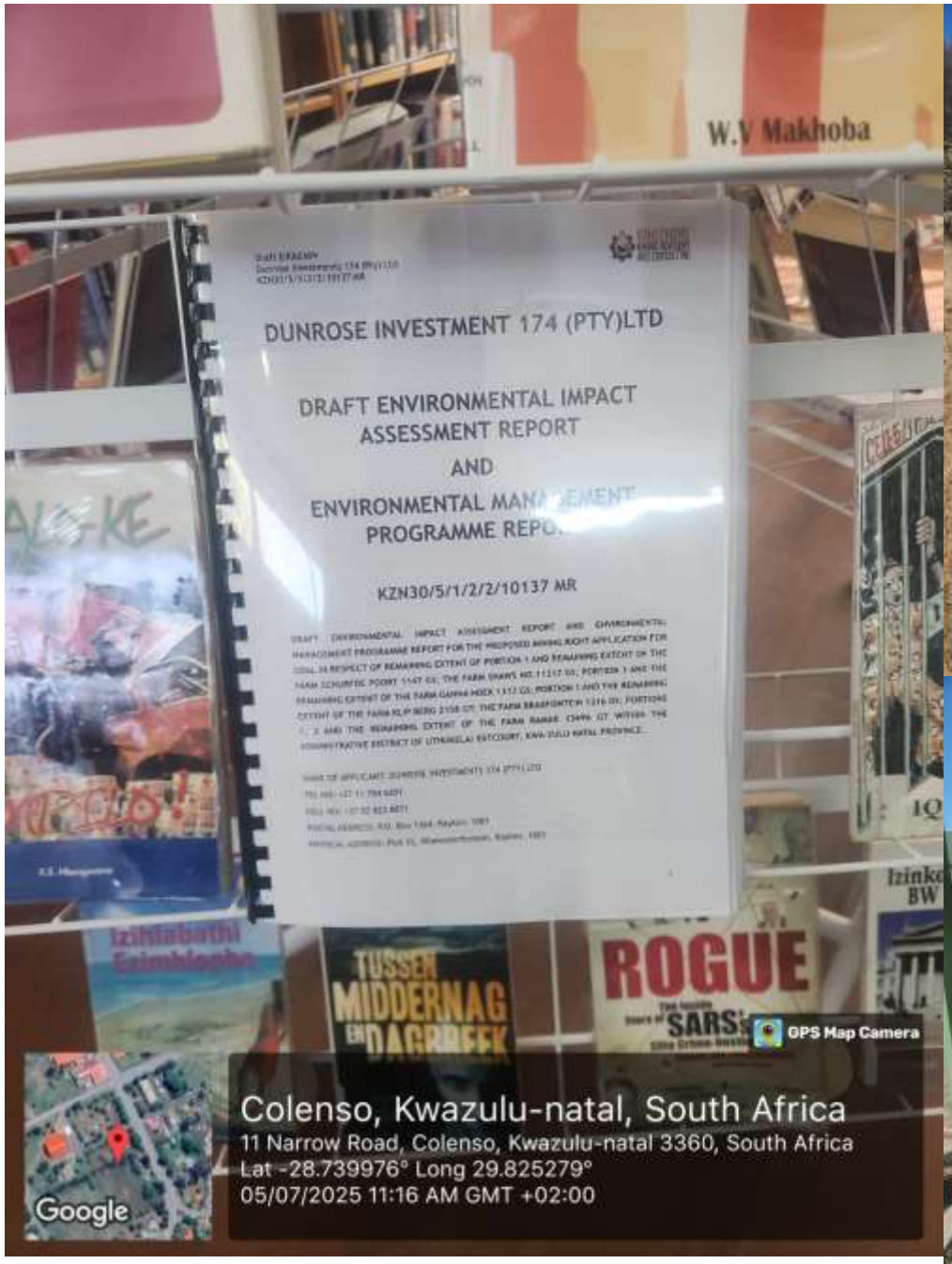
1. Indigent Support, Pensioner's & Disabled Owners Rebates:

2. Discount on Advance payments:

3. Arrangement for debt settlement

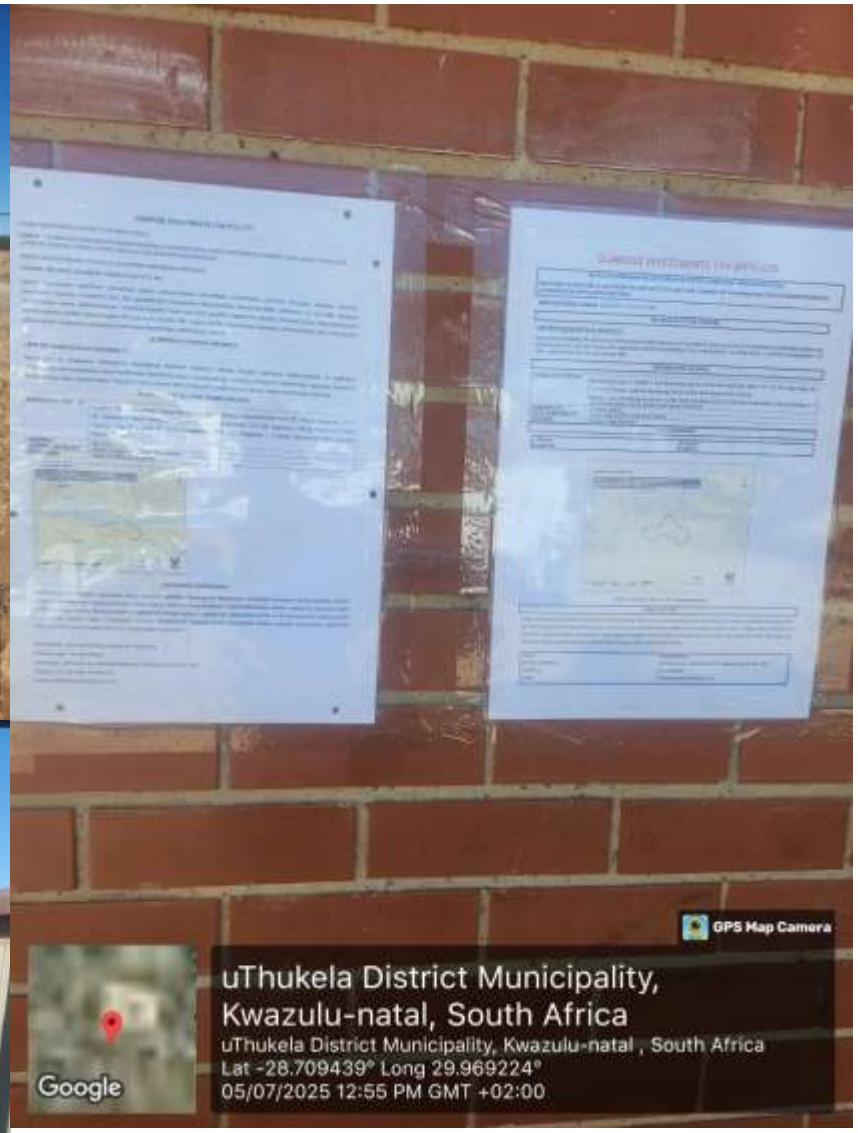
4. Public Benefit Organisation Rebate

Please be advised that the deadline for submitting advertisements, legal notices, and general notices to the Ladysmith Gazette will be
4:00 PM on Mondays


W.V Makhoba
DUNROSE INVESTMENT 174 (PTY)LTD
DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT
AND
ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT
KZN30/5/1/2/2/10137 MR
ROGUE
GPS Map Camera
Colenso, Kwazulu-natal, South Africa
11 Narrow Road, Colenso, Kwazulu-natal 3360, South Africa
Lat -28.739976° Long 29.825279°
05/07/2025 11:16 AM GMT +02:00
Google


GPS Map Camera
uThukela District Municipality,
Kwazulu-natal, South Africa
Google


GPS Map Camera
Umnambithi, Kwazulu-natal, South Africa
Google


GPS Map Camera
uThukela District Municipality,
Kwazulu-natal, South Africa
uThukela District Municipality, Kwazulu-natal , South Africa
Lat -28.709439° Long 29.969224°
05/07/2025 12:55 PM GMT +02:00
Google

SPECIALIST STUDIES UNDERTAKEN

Terrestrial Biodiversity Assessment	Traffic Impact Assessment
Palaeontology Impact Assessment	Socio-economic Impact Assessment
Soil and Land Capability Impact Assessment	Visual and Land Impact Assessment
Floodline Assessment	Noise Impact Assessment
Wetland Impact Assessment	Geotechnical Assessment
Archaeological and Heritage Impact Assessment	Health Impact Assessment
Air Quality Impact Assessment	Seismicity Assessment

IMPACT ASSESSMENT FROM THE SPECIALIST STUDIES AND MITIGATION MEASURES

SPECIALIST STUDY	POTENTIAL IMPACTS	MITIGATION MEASURES
Air Quality Impact Assessment	Dust fall and PM10 and PM 2.5 from operations that are going to take place at the proposed mine from the highwall mining, wind erosion from temporary coal stockpile and FELs.	Dust management plan; Air quality monitoring for PM10 and PM 2.5 and dust fall monitoring. Wet suppression with the use of water sprays.
Soil and Land Use Impact Assessment	Land withdrawal from livestock grazing land use within the Schurfde Poort Farm	Initiate communal grazing land negotiations and obtain relevant agreements to mitigate the residual impact on the land carrying capacity for the duration of the proposed mining activities until the land is adequately rehabilitated.
Archaeological and Heritage Impact Assessment	Mining activities has the potential to damage graves and grave sites.	Leave the site and graves on it intact. This entails demarcating the site with a proper boundary fence and providing an entrance gate for potential visitors. A Graves Management Plan will have to be drafted and implemented as part of the development.
Palaeontology Impact Assessment	Earth moving equipment/ machinery (FELs and bulldozers) are threats to the National Heritage which will be used during the construction phase, disturbance, damage or destruction of the fossils.	A Chance Find Protocol is to immediately cease all mining activities, construct a 30 m no-go barrier and contact AMAFA for further investigation.

Socio-economic Impact Assessment	Creation of temporary employment during the construction phase, and some will go until operational phase.	Ensure that local communities understand the mining project's procurement and employment requirements in terms of skills and types of contracts and employment.
Visual and Land Impact Assessment	Vegetation clearance and the excavation of highwall may disrupt the natural flow and visual continuity of the landscape, especially on ridgelines and slopes.	Establish buffer zones of indigenous vegetation around the perimeter of the site and along access roads, especially near sensitive visual receptors such as residential areas and lodges. Fat-growing native trees and shrubs should be prioritised to provide effective screening within the shortest time.
Noise Impact Assessment	Noise pollution from mining equipment.	The mine must implement a quarterly night-time noise monitoring programme at houses used for residential activities. The applicant must implement a line of communication (a helpline where complaints could be lodged).

Traffic Impact Assessment	The proposed coal mining activities will result in additional trips to the transportation system. However, no coal hauling trucks will be generated as the conveyor belts will be used for coal transportation to the nearby hydrogen plant.	Development of a detailed plan that outlines traffic flow, parking, designated roadways and communication procedures.
Health Impact Assessment	Dust emissions at the mining boundary has the potential to cause airborne pollutants that can affect human health with diseases like cardiopulmonary or lung cancer.	The calculated and predicted health impact risk rating for all sensitive receptors living within 20km downwind for the proposed Colenso Coal is low.
Geotechnical and Seismicity Assessment	**Land instability** : creation of highwall introduces the risk of slope instability, which causes potential failure mechanisms including planar, wedge, toppling, and circular failures which can impact the mining bench, equipment and personnel operating at the toe of the highwall.	**Highwall stability:** Geotechnical engineers will design highwall angles, inter-ramp angles, and bench configurations based on detailed rock mass characterization, structural analyses and advanced numerical stability modelling.

Terrestrial Biodiversity Impact Assessment	Habitat destruction and fragmentation. Further loss of Thukela valley bushveld and Thukela thornveld.	Minimise the construction footprint and reserve indigenous vegetation wherever possible. All disturbed areas no longer used must be rehabilitated to the satisfaction of the competent authorities. This will encourage species recruitment into previously disturbed areas.
Aquatic Study	The clearing of natural vegetation and the stripping of topsoil will result in the increased runoff of sediment from the site into watercourses associated with the proposed project area during high rainfall.	Protect topsoil stockpiles from erosion.
Floodline Study	Surface runoff around the proposed project area causing water contamination to the main river (Tugela).	Implementation of the stormwater management plan and an environmental management plan.

CONCLUSION

- In conclusion, our comprehensive Environmental Impact Assessment and Environmental Management Programme has demonstrated that the proposed coal mining project can be undertaken in an environmentally friendly and responsible manner.

- Through thorough specialist assessments, we have identified potential impacts and developed effective mitigation measures.

- Our specialists have confirmed that the implementation of these mitigation measures, the project can proceed while minimizing harm to the environment and local communities.

- The client is committed to adhering to these measures and ensuring that their operations are conducted in a responsible and sustainable manner.

Appendix 4:

Screening Tool Report

SCREENING REPORT FOR AN ENVIRONMENTAL AUTHORIZATION AS REQUIRED BY THE 2014 EIA REGULATIONS – PROPOSED SITE ENVIRONMENTAL SENSITIVITY

EIA Reference number: KZN30/5/1/2/2/10137 MR

Project name: Scoping

Project title: Mining Right

Date screening report generated: 10/12/2024 13:47:47

Applicant: Dunrose Investments 174 (Pty) Ltd

Compiler: Dimakatso Leholi

Compiler signature: D. Leholi

Application Category: Mining|Mining Right

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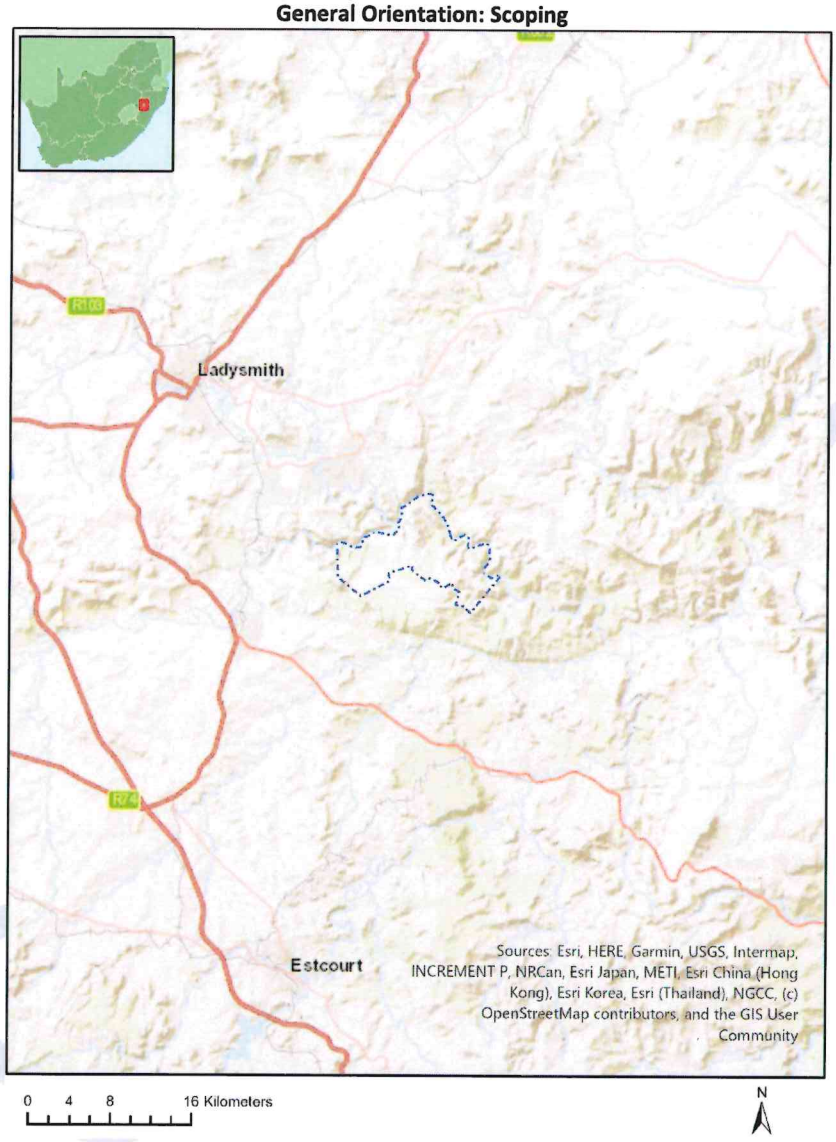
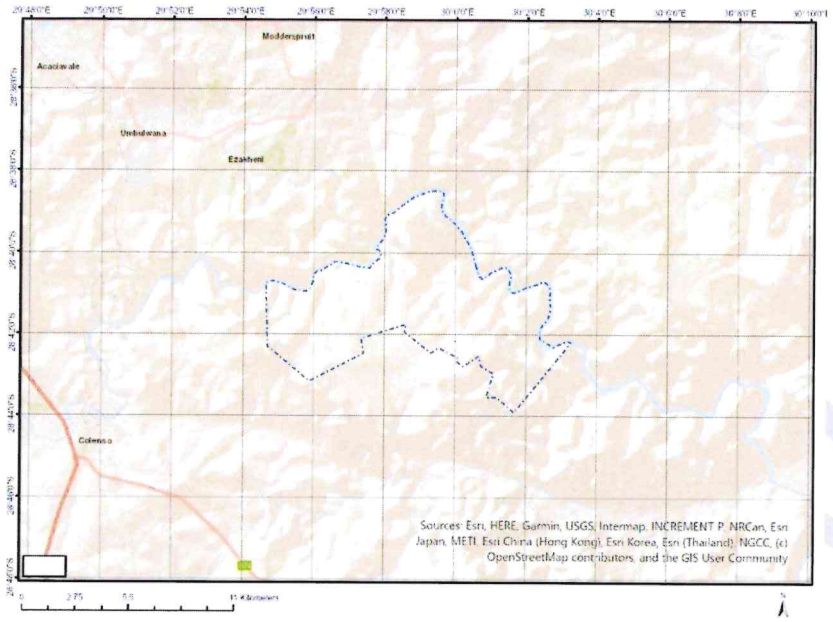
Proposed Project Location

Orientation map 1: General location

General Orientation: Scoping



Map of proposed site and relevant area(s)



Cadastral details of the proposed site

Property details:

No	Farm Name	Farm/ Erf No	Portion	Latitude	Longitude	Property Type
1	SCHURFDE POORT	1147	0	28°41'30.99S	29°56'43.41E	Farm
2	BRAK FONTEIN	1316	0	28°41'44.55S	29°59'45.08E	Farm
3	GANNA HOEK	1317	0	28°39'58.58S	29°59'48.85E	Farm
4	ROOSDAL 2176	13696	0	28°41'15.98S	30°1'41.6E	Farm
5	THE SHAWS	11317	0	28°39'30.57S	29°58'24.08E	Farm
6	KLIP BERG	2158	0	28°42'35.86S	30°1'43.61E	Farm
7	GANNA HOEK	1317	1	28°40'37.61S	30°0'21.32E	Farm Portion
8	GANNA HOEK	1317	0	28°39'47.76S	29°59'33.8E	Farm Portion
9	BRAK FONTEIN	1316	0	28°41'44.97S	29°59'45.02E	Farm Portion
10	SCHURFDE POORT	1147	0	28°41'41.49S	29°56'3.13E	Farm Portion
11	SCHURFDE POORT	1147	1	28°41'12.8S	29°57'53.26E	Farm Portion
12	SCHURFDE POORT	1147	2	28°42'3.02S	29°57'58.83E	Farm Portion
13	ROOSDAL 2176	13696	2	28°42'17.99S	30°3'1.56E	Farm Portion
14	ROOSDAL 2176	13696	0	28°41'10.89S	30°1'31.5E	Farm Portion
15	ROOSDAL 2176	13696	1	28°41'45.93S	30°2'16.44E	Farm Portion
16	THE SHAWS	11317	0	28°39'31.2S	29°58'23.92E	Farm Portion
17	KLIP BERG	2158	1	28°41'37.78S	30°1'2.32E	Farm Portion
18	KLIP BERG	2158	0	28°42'48.81S	30°1'39.26E	Farm Portion

Development footprint[1] vertices:
No development footprint(s) specified.

Wind and Solar developments with an approved Environmental Authorisation or applications under consideration within 30 km of the proposed area

No	EIA Reference No	Classification	Status of application	Distance from proposed area (km)
1	12/12/20/2672	Solar PV	Approved	29
2	12/12/20/2671	Solar PV	Approved	19.5

Environmental Management Frameworks relevant to the application

No intersections with EMF areas found.

Environmental screening results and assessment outcomes

The following sections contain a summary of any development incentives, restrictions, exclusions or prohibitions that apply to the proposed development site as well as the most environmental sensitive features on the site based on the site sensitivity screening results for the application classification that was selected. The application classification selected for this report is: **Mining|Mining Right**.

Relevant development incentives, restrictions, exclusions or prohibitions

The following development incentives, restrictions, exclusions or prohibitions and their implications that apply to this site are indicated below.

No intersection with any development zones found.

Proposed Development Area Environmental Sensitivity

The following summary of the development site environmental sensitivities is identified. Only the highest environmental sensitivity is indicated. The footprint environmental sensitivities for the proposed development footprint as identified, are indicative only and must be verified on site by a suitably qualified person before the specialist assessments identified below can be confirmed.

Theme	Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
Agriculture Theme		X		
Animal Species Theme		X		

[1] "development footprint", means the area within the site on which the development will take place and incudes all ancillary developments for example roads, power lines, boundary walls, paving etc. which require vegetation clearance or which will be disturbed and for which the application has been submitted.

Aquatic Biodiversity Theme	X			
Archaeological and Cultural Heritage Theme	X			
Civil Aviation Theme		X		
Defence Theme				X
Paleontology Theme	X			
Plant Species Theme			X	
Terrestrial Biodiversity Theme	X			

Specialist assessments identified

Based on the selected classification, and the known impacts associated with the proposed development, the following list of specialist assessments have been identified for inclusion in the assessment report. It is the responsibility of the EAP to confirm this list and to motivate in the assessment report, the reason for not including any of the identified specialist study including the provision of photographic evidence of the site situation.

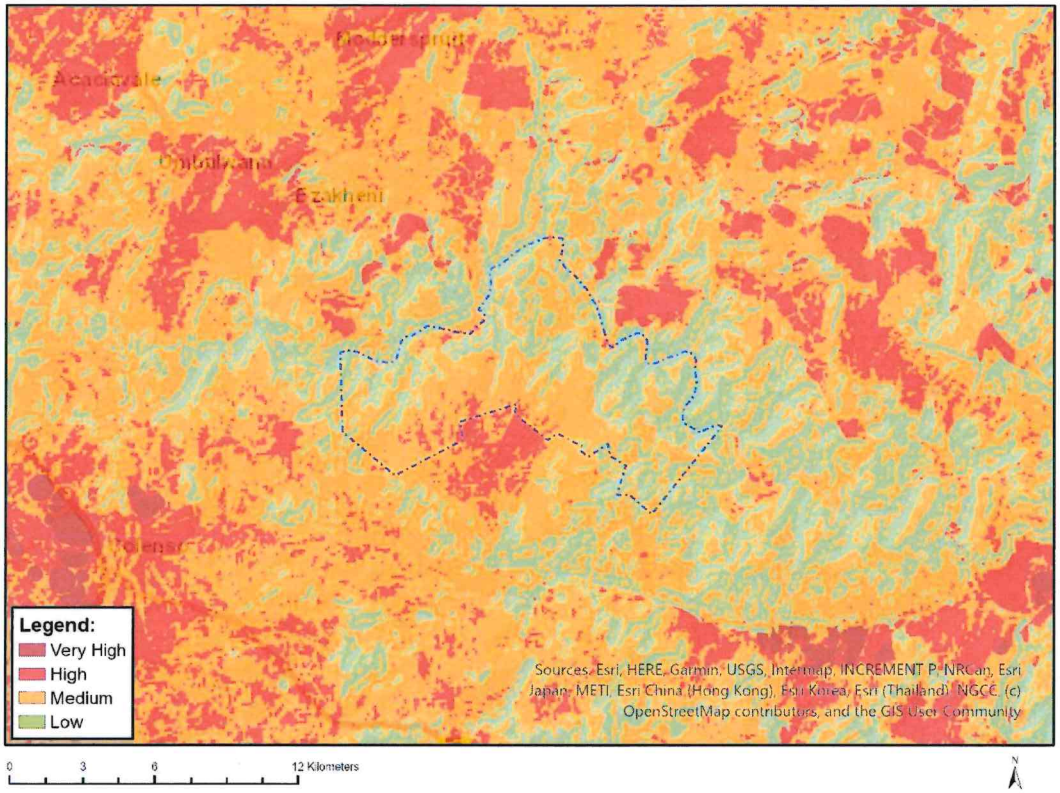
No	Specialist assessment	Assessment Protocol
1	Agricultural Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Agriculture_Assessment_Protocols.pdf
2	Landscape/Visual Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
3	Archaeological and Cultural Heritage Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
4	Palaeontology Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
5	Terrestrial Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Terrestrial_Biodiversity_Assessment_Protocols.pdf
6	Aquatic Biodiversity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Aquatic_Biodiversity_Assessment_Protocols.pdf
7	Hydrology Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
8	Noise Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Noise_Impacts_Assessment_Protocol.pdf
9	Radioactivity Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
10	Traffic Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
11	Geotechnical Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf

12	Climate Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
13	Health Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
14	Socio-Economic Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
15	Ambient Air Quality Impact Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
16	Seismicity Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_General_Requirement_Assessment_Protocols.pdf
17	Plant Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Plant_Species_Assessment_Protocols.pdf
18	Animal Species Assessment	https://screening.environment.gov.za/ScreeningDownloads/AssessmentProtocols/Gazetted_Animal_Species_Assessment_Protocols.pdf

Results of the environmental sensitivity of the proposed area.

The following section represents the results of the screening for environmental sensitivity of the proposed site for relevant environmental themes associated with the project classification. It is the duty of the EAP to ensure that the environmental themes provided by the screening tool are comprehensive and complete for the project. Refer to the disclaimer.

MAP OF RELATIVE AGRICULTURE THEME SENSITIVITY

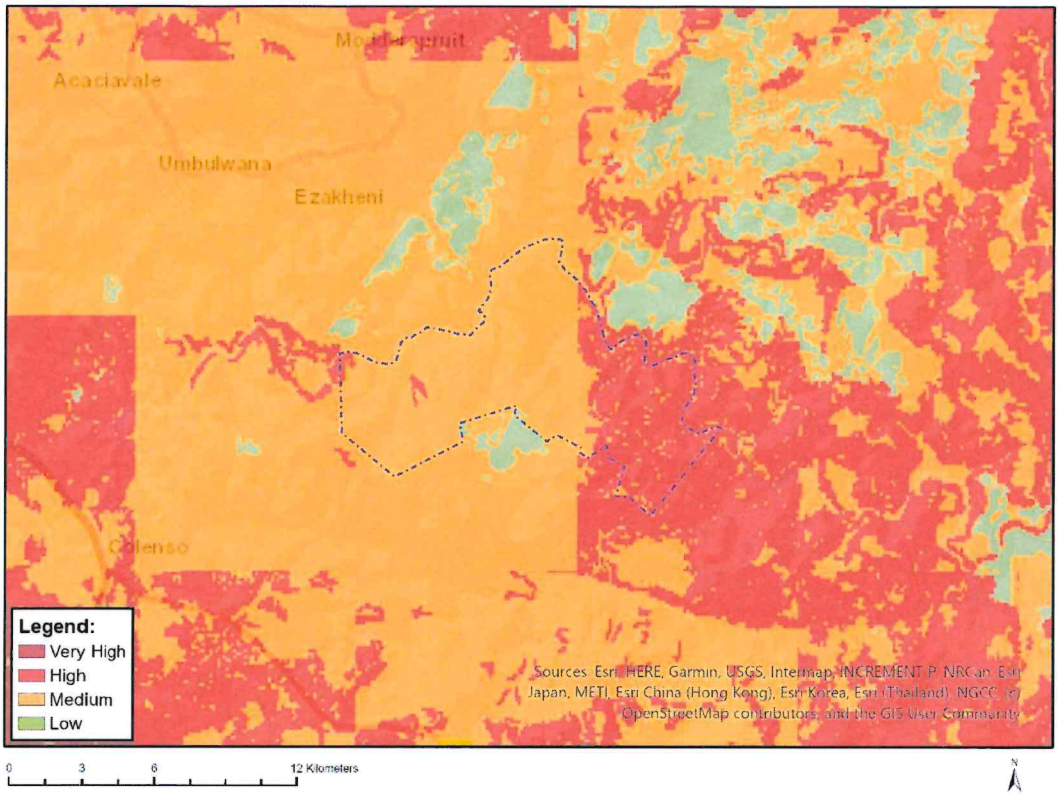


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Land capability;09. Moderate-High/10. Moderate-High
High	Subsistence Farming 1;Land capability;09. Moderate-High/10. Moderate-High
High	Subsistence Farming 1;Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate
Low	Land capability;01. Very low/02. Very low/03. Low-Very low/04. Low-Very low/05. Low
Medium	Land capability;06. Low-Moderate/07. Low-Moderate/08. Moderate

MAP OF RELATIVE ANIMAL SPECIES THEME SENSITIVITY



Where only a sensitive plant unique number or sensitive animal unique number is provided in the screening report and an assessment is required, the environmental assessment practitioner (EAP) or specialist is required to email SANBI at eiadatarequests@sanbi.org.za listing all sensitive species with their unique identifiers for which information is required. The name has been withheld as the species may be prone to illegal harvesting and must be protected. SANBI will release the actual species name after the details of the EAP or specialist have been documented.

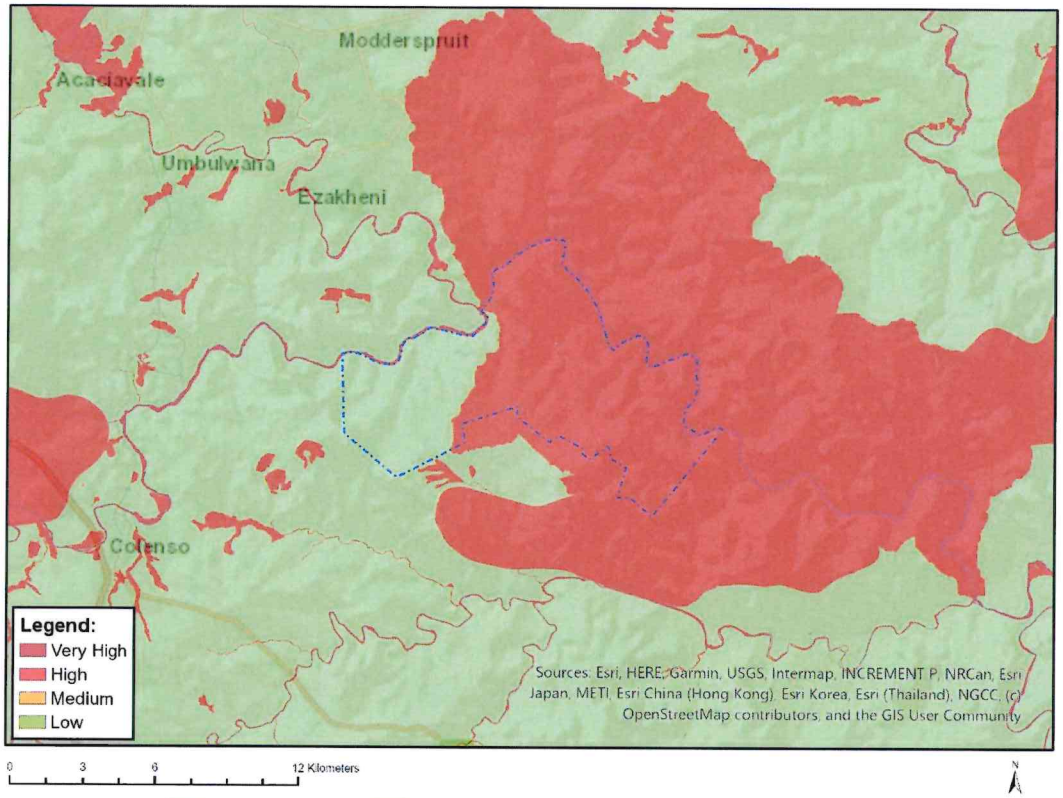
Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Aves-Geronticus calvus
High	Aves-Falco biarmicus
High	Aves-Aquila rapax
High	Mammalia-Loxodonta africana
Low	Subject to confirmation
Medium	Aves-Sagittarius serpentarius
Medium	Aves-Podica senegalensis
Medium	Aves-Hydroprogne caspia
Medium	Aves-Geronticus calvus
Medium	Aves-Aquila rapax
Medium	Aves-Eupodotis senegalensis
Medium	Insecta-Lepidochrysops procera
Medium	Sensitive species 5

Medium	Mammalia-Ourebia ourebi ourebi
Medium	Sensitive species 8
Medium	Reptilia-Kinixys natalensis

MAP OF RELATIVE AQUATIC BIODIVERSITY THEME SENSITIVITY

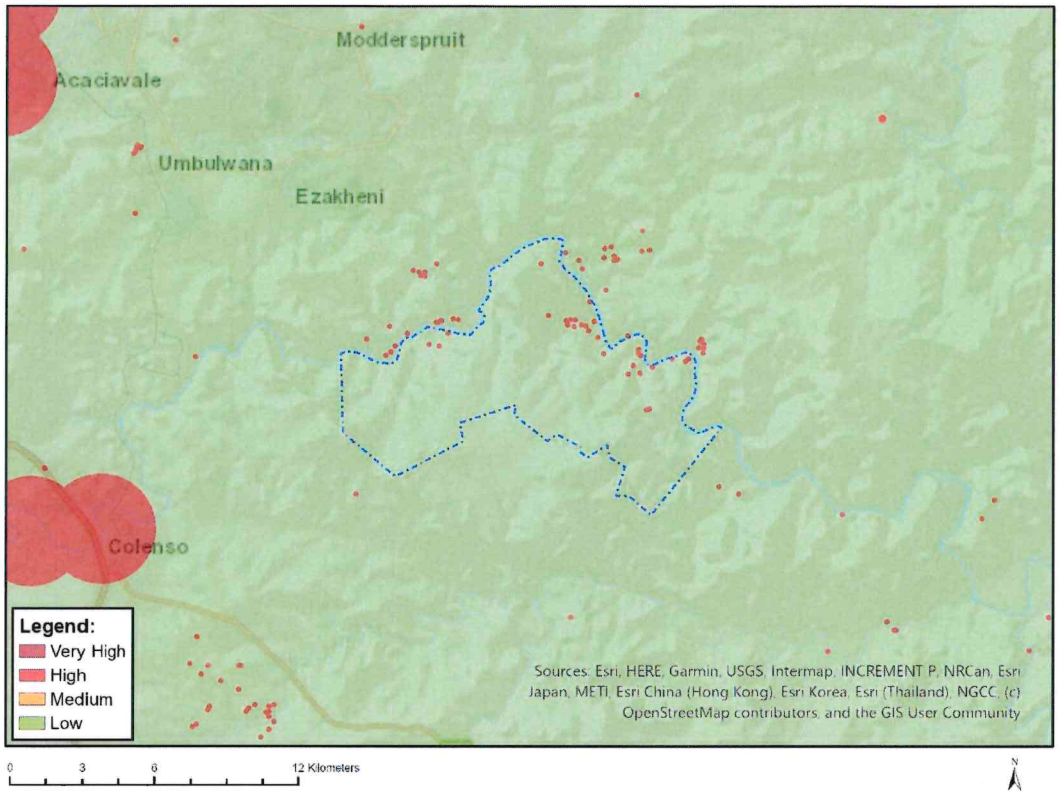


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity
Very High	FEPA Subcatchment
Very High	Rivers_B
Very High	Rivers_C
Very High	SWSA (SW) _Northern Drakensberg
Very High	Wetlands_(River)

MAP OF RELATIVE ARCHAEOLOGICAL AND CULTURAL HERITAGE THEME SENSITIVITY

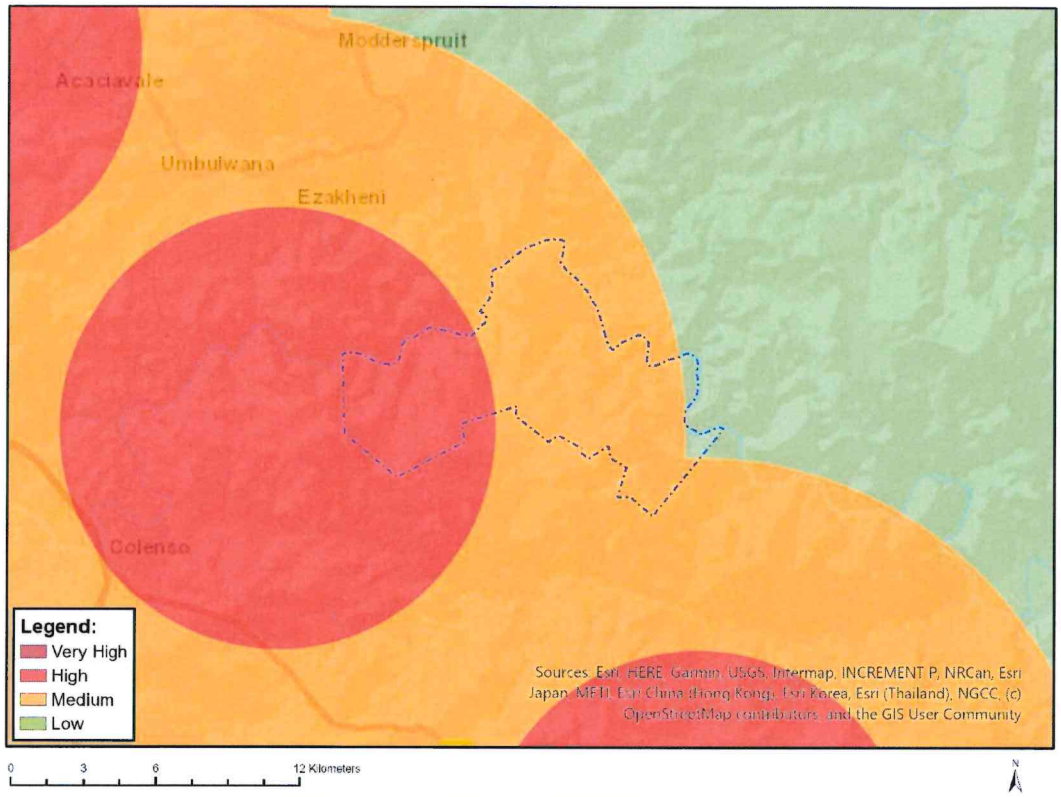


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low sensitivity
Very High	Within 100m of an Ungraded Heritage site

MAP OF RELATIVE CIVIL AVIATION THEME SENSITIVITY

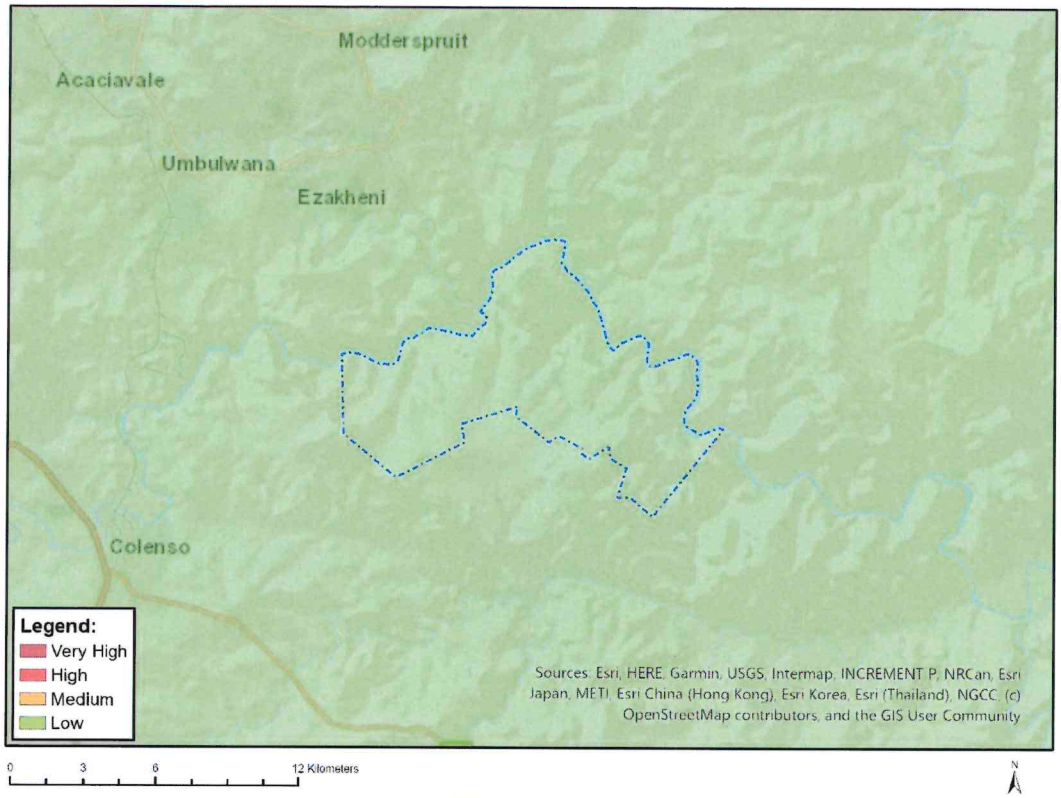


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
	X		

Sensitivity Features:

Sensitivity	Feature(s)
High	Within 8 km of other civil aviation aerodrome
Low	Low sensitivity
Medium	Between 8 and 15 km of other civil aviation aerodrome

MAP OF RELATIVE DEFENCE THEME SENSITIVITY

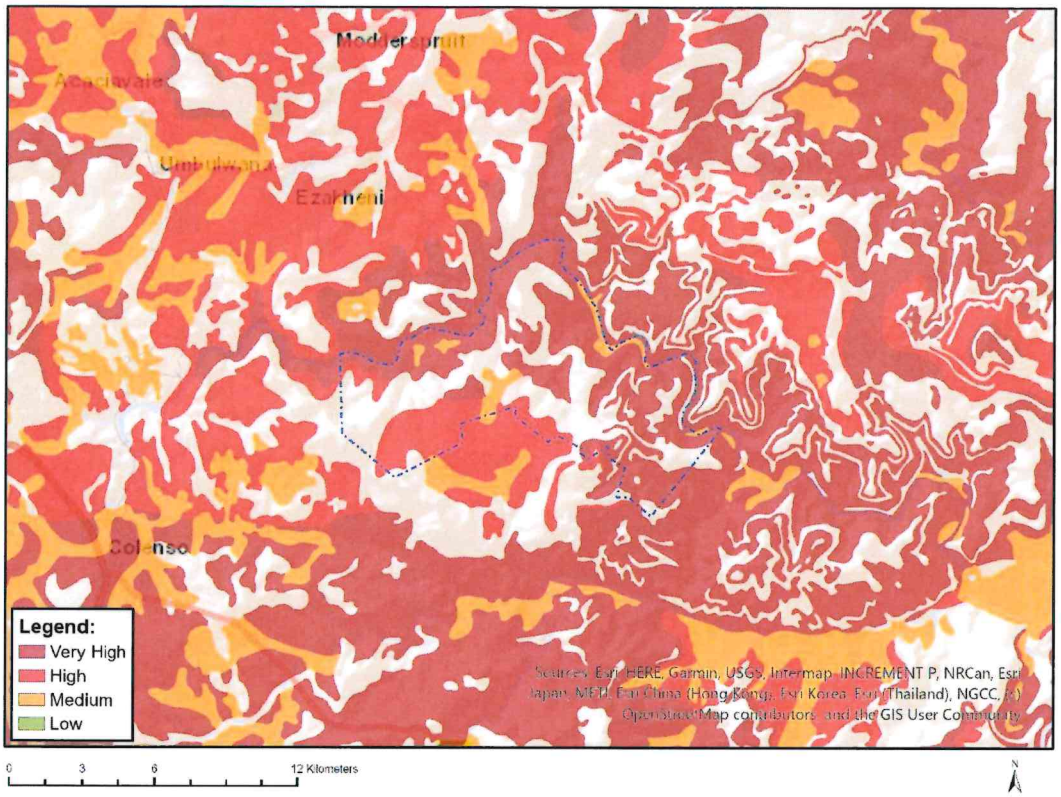


Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
			X

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
High	Features with a High paleontological sensitivity
Medium	Features with a Medium paleontological sensitivity
Very High	Features with a Very High paleontological sensitivity

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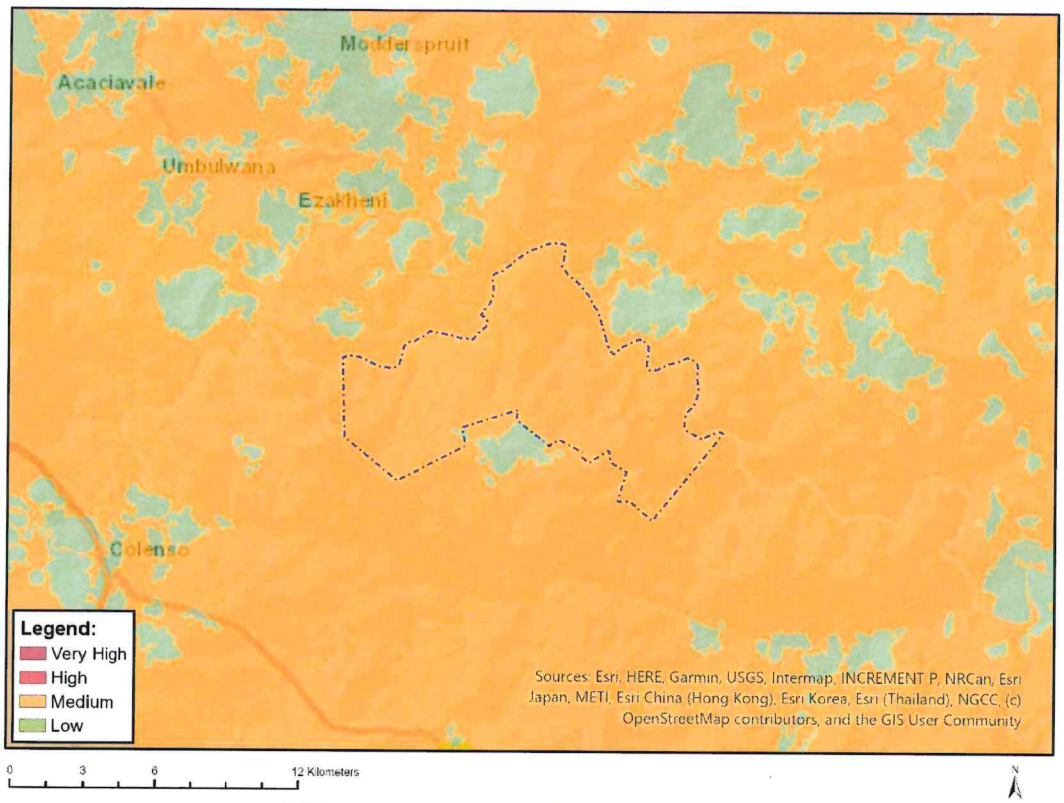
MAP OF RELATIVE PLANT SPECIES THEME SENSITIVITY



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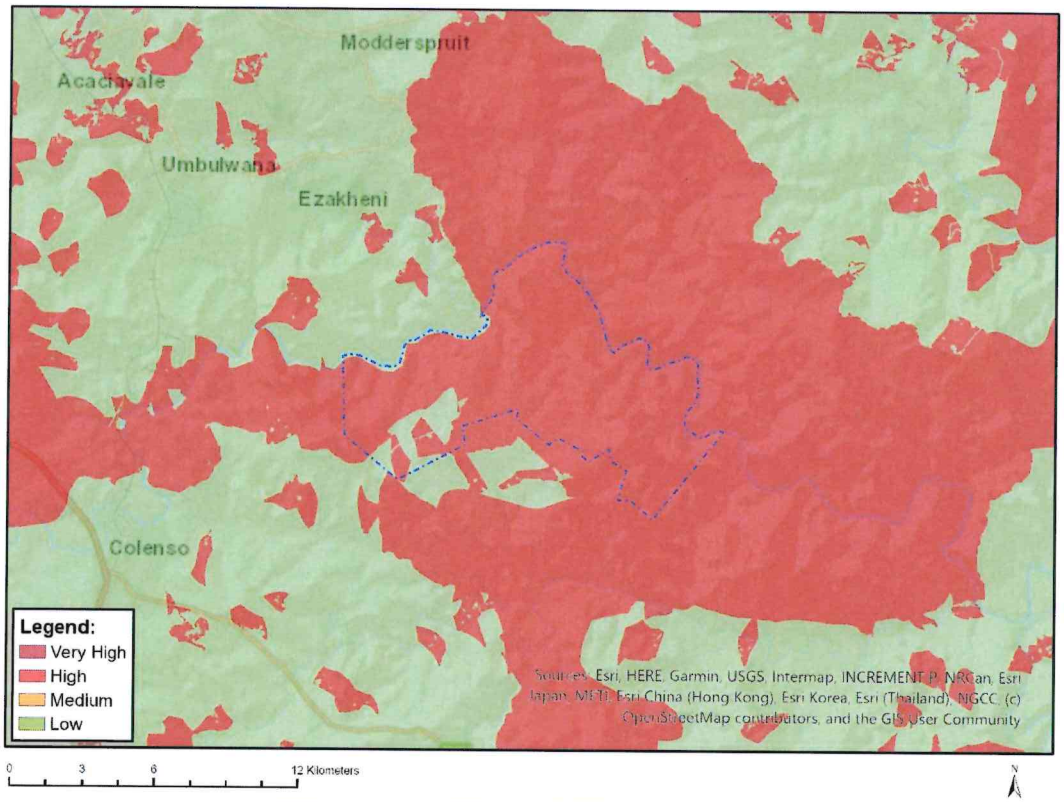
Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
		X	

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity
Medium	Sensitive species 1252
Medium	Sensitive species 596
Medium	Sensitive species 1181
Medium	Vitellariopsis dispar
Medium	Thunbergia venosa

MAP OF RELATIVE TERRESTRIAL BIODIVERSITY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Low	Low Sensitivity
Very High	ESA
Very High	CBA: Optimal
Very High	CBA: Irreplaceable
Very High	FEPA Subcatchment
Very High	SWSA (SW) _Northern Drakensberg
Very High	National Protected Area Expansion Strategy (NPAES)

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