

## **SUMMARY OF THE PUBLIC PARTICIPATION PROCESS FOLLOWED TO DATE AND STILL TO BE FOLLOWED**

### **Notification to I&APs**

Potential I&AP's are notified about the project in the following manner (this is in compliance with Regulation 41 of GN R982):

- Fixing notice boards at the boundary of the property in compliance with Regulation 41 of GN R982. Notice boards were placed on the site boundary on 22 March 2024.
- Written notifications are sent via registered post to potential I&APs (i.e. landowner, direct neighbours etc.) inviting them to register and give comments on the proposed development within 30 days from the date which appears on the notice. These notifications are in line with the requirements of the Regulations. Written notifications were sent to the landowner and direct neighbours via email or registered post on 18 April 2024.
- Placing an advertisement in a local newspaper of the notice in compliance with the Regulations. A notice was placed in the Suid-Kaap Forum on 22 March 2024.

All potential I&APs were afforded the opportunity (within a 30 day period) to register for the project. All registered I&APs will be informed of further activities regarding the project.

### **Public Meetings, Workshops and Pre-application Meetings**

A pre-application public participation open day meeting was held on 10 September 2024 at the Riversdale Civic Centre from 10:30am – 8:00pm. A notice informing the public of the open day meeting was placed in the Suid-Kaap Forum local newspaper and all registered interested and affected parties notified accordingly.

### **Availability of the Pre-Application Draft and Draft Basic Assessment Reports**

As per the requirements of Regulation 43 of GN R982, the Pre-application Draft and Draft Basic Assessment Reports (BAR) will be made available to all relevant state departments and all registered I&APs for a 30 day commenting period.

The Pre-application Draft BAR and Draft BAR will be included for statutory comment with the written notice to be sent to the commenting organs of state for a 30 day commenting period. Electronic copies (CDs) will also made available to any department or I&AP on request.

The Pre-application Draft and Draft Basic Assessment Reports will be sent to the following Key Departments for consideration/comments:

- Department: Mineral Resources and Energy
- Breede-Gouritz Catchment Management Agency
- CapeNature Scientific Services
- DEA&DP: Development Facilitation
- DEA&DP: Planning/Land Management
- DEA&DP: Pollution & Chemical Management
- DEA&DP: Waste Management
- DEA&DP: Air Quality Management

- Department of Agriculture -Western Cape
- Department of Agriculture, Land Reform and Rural Development - National
- Garden Route District Municipality
- Heritage Western Cape: A Notice of Intent to Develop was also submitted to HWC
- Simon van der Stel Foundation Southern Cape
- Hessequa Municipality
- National Nuclear Regulator
- Gouritz Cluster Biosphere Reserve
- Department of Land Affairs: Land Claims
- Western Cape Department of Health

Proof of delivery to be attached to the final BAR.

Comments received will be responded to as per the requirements of regulations. The comments and response report as well as all comments received will be attached to the final BAR under Appendix C.

### **The Final BAR Phase**

Once all comments have been received, the BAR will be finalised taking into account the comments and submitted to the competent authority for a decision.

### **Decision and Appeal Period**

Once the DMR have reviewed the Final BAR and are satisfied that it contains sufficient information to make an informed decision, the DMR will use the information contained within the BAR to determine the environmental acceptability of the proponent's preferred options. A decision on the applications and associated reports will be made by the DMR based on the findings of the BAR.

Following the issuing of the decision, all key department and registered I&APS will be notified and afforded the opportunity to appeal the decision to the MEC of the DMR in terms of the NEMA.

Proof of the Public Participation Process conducted/to be conducted will be attached to the Final BAR under Appendix C.

**TABLE 1: LIST OF IDENTIFIED KEY DEPARTMENTS AND REGISTERED I&APs**

<b>STAKEHOLDER</b>	<b>CONTACT &amp; REF NR</b>	<b>TELEPHONE</b>	<b>FAX</b>	<b>EMAIL</b>
Department: Mineral Resources Private Bag X 09 Roggebaai 8012	Regional Manager: Mr Pieter Swart (Hard and CD copies of reports provided)	021 427 1013	021 427 1046	<a href="mailto:Pieter.swart@dmr.gov.za">Pieter.swart@dmr.gov.za</a> <a href="mailto:Pumla.mntuyedwa@dmr.gov.za">Pumla.mntuyedwa@dmr.gov.za</a> <a href="mailto:Willry.vanBreda@dmre.gov.za">Willry.vanBreda@dmre.gov.za</a>
CapeNature Conservation Operations: Landscape Conservation Intelligence Management Unit 16 17 <sup>th</sup> Avenue Voëlklip Hermanus 7200	Rhett Smart	087 087 8017/072 835 8741	-	<a href="mailto:rsmart@capenature.co.za">rsmart@capenature.co.za</a>
DEA&DP: Development Management Private Bag X 6509 George 6530	Shireen Pullen	044 805 8600	-	<a href="mailto:Shireen.Pullen@westerncape.gov.za">Shireen.Pullen@westerncape.gov.za</a>
DEA&DP: Planning Private Bag X 6509 George 6530	Elma Vreken	-	-	<a href="mailto:Elma.Vreken@westerncape.gov.za">Elma.Vreken@westerncape.gov.za</a>
DEA&DP: Development Facilitation Private Bag X9086 Cape Town 8000	Adri La Meyer	021 483 2887	021 483 4185	<a href="mailto:deadp.s24o@westerncape.gov.za">deadp.s24o@westerncape.gov.za</a> <a href="mailto:deadpeiaadmin.george@westerncape.gov.za">deadpeiaadmin.george@westerncape.gov.za</a>
DEA&DP: Pollution & Chemicals Management Private Bag X9086 Cape Town 8000	Mrs Arabel McClelland	021 483 2660		<a href="mailto:Arabel.McClelland@westerncape.gov.za">Arabel.McClelland@westerncape.gov.za</a>
DEA&DP: Waste Management Private Bag X9086 Cape Town 8000	Hassan Parker	-	-	<a href="mailto:Hassan.Parker@westerncape.gov.za">Hassan.Parker@westerncape.gov.za</a>
DEA&DP: Air Quality Management Private Bag X9086	Mzolisi Benxa	021 483 4383		<a href="mailto:Mzolisi.Benxa@westerncape.gov.za">Mzolisi.Benxa@westerncape.gov.za</a> <a href="mailto:deadp.aqm@westerncape.gov.za">deadp.aqm@westerncape.gov.za</a>










Cape Town 8000				
Department of Agriculture Private Bag X1 Elsenburg 7606	Cor van der Walt (CD copies of reports provided) Ref: 20/9/2/4/8/527	021 808 5099	021 808 5092	<a href="mailto:Brandon.layman@westerncape.gov.za">Brandon.layman@westerncape.gov.za</a> <a href="mailto:Cor.vanderwalt@westerncape.gov.za">Cor.vanderwalt@westerncape.gov.za</a>
National Department of Agriculture, Land Reform and Rural Development Land Use and Soil Management Private Bag X9189 Cape Town 8000 (Quarantine Station, Polkadraai Road, Stellenbosch, 7599)	Lutendo Netshilema (CD copies of reports provided)	021 994 1413/1424	021 944 1427	<a href="mailto:lutendon@dalrrd.gov.za">lutendon@dalrrd.gov.za</a> <a href="mailto:rhahabm@dalrrd.gov.za">rhahabm@dalrrd.gov.za</a>
Breede Gouritz Catchment Management Agency (also commenting on behalf of Department of Water and Sanitation) PO Box 1205 George 6530	Mr M Mthimkhulu	023 346 8000		<a href="mailto:mmthimkhulu@bgcma.co.za">mmthimkhulu@bgcma.co.za</a> <a href="mailto:info@bgcma.co.za">info@bgcma.co.za</a>
Heritage Western Cape PO Box 1665 Cape Town 8000	Stephanie Barnardt	021 829 3315		<a href="mailto:Stephanie.barnardt@westerncape.gov.za">Stephanie.barnardt@westerncape.gov.za</a> <a href="mailto:ceoheritage@westerncape.gov.za">ceoheritage@westerncape.gov.za</a>
Hessequa Municipality P.O. Box 29 Riversdale 6670	Municipal Manager or Mr. Shagon Carelse Head: Environmental Services	028 713 8000	0287133146	<a href="mailto:shagon@hessequa.gov.za">shagon@hessequa.gov.za</a> <a href="mailto:mm@hessequa.gov.za">mm@hessequa.gov.za</a> <a href="mailto:collab@hessequa.gov.za">collab@hessequa.gov.za</a> <a href="mailto:info@hessequa.gov.za">info@hessequa.gov.za</a> <a href="mailto:bertus@hessequa.gov.za">bertus@hessequa.gov.za</a> <a href="mailto:phillip@hessequa.gov.za">phillip@hessequa.gov.za</a>
Garden Route District Municipality Environmental Management P.O. Box 12 George 6530	Nina Viljoen	044 803 1318	-	<a href="mailto:nina@gardenroute.gov.za">nina@gardenroute.gov.za</a>
Gouritz Cluster Biosphere Reserve	Mrs Marinda van As	028 050	-	<a href="mailto:admin@gouritz.com">admin@gouritz.com</a>

		0576		
National Nuclear Regulator PO Box 7106 Centurion 0046	Mr. Patle Mohajane	012 674 7130	-	<a href="mailto:pemohajane@nnr.co.za">pemohajane@nnr.co.za</a>
Department of Rural Development and Land Reform 15 Mark Street Stellenbosch 7600	The Director	021 887 7448	-	<a href="mailto:queries@drdlr.gov.za">queries@drdlr.gov.za</a>
Western Cape Department of Health PO Box 2060 Cape Town 8000	Mr Stanley Nomdo	021 421 1124	021 418 5685	<a href="mailto:snomdo@pgwc.gov.za">snomdo@pgwc.gov.za</a> <a href="mailto:marika.champion@westerncape.gov.za">marika.champion@westerncape.gov.za</a>
Simon van der Stel Foundation Southern Cape PO Box 4037 George East 6539	Mr Raymond Auerbach	044 889 0008/ 083 752 9340	-	<a href="mailto:raymond.auerbach@mandela.ac.za">raymond.auerbach@mandela.ac.za</a>
Department: Transport and Public Works Western Cape Government PO Box 2603 Cape Town 8000	Vanessa Stoffels	021 483 4669	-	<a href="mailto:Vanessa.stoffels@westerncape.gov.za">Vanessa.stoffels@westerncape.gov.za</a>
<b>LANDOWNER AND REGISTERED INTERESTED AND AFFECTED PARTY</b>				
Landowner GP Van Rensburg Trust PO Box 331 Riversdal 6670				<a href="mailto:gp.rensburg@gmail.com">gp.rensburg@gmail.com</a>
Registered I&AP 1 (Contact details to be provided as part of Final BAR to decision making authority)				
Registered I&AP 2 (Contact details to be provided as part of Final BAR to decision making authority)				

Registered I&AP 3 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 4 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 5 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 6 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 7 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 8 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 9 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 10 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 11 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 12 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 13 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 14 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 15 (Contact details to be provided as part of Final BAR to decision making authority)	

authority)	
Registered I&AP 16 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 17 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 18 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 19 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 20 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 21 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 22 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 23 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 24 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 25 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 26 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 27 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 28	

(Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 29 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 30 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 31 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 32 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 33 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 34 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 35 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 36 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 37 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered I&AP 38 (Contact details to be provided as part of Final BAR to decision making authority)	
Registered Interested and Affected Parties as per Public Meeting Attendance Register 	

        	
---	--

## LANDOWNER AND DIRECT NEIGHBOURS NOTIFIED

### **Landowner**

Landowner  
GP Van Rensburg Trust  
PO Box 331  
Riversdal  
6670  
[gp.rensburg@gmail.com](mailto:gp.rensburg@gmail.com)

### **Neighbours**

PJ and MJ Skinner  
PO Box 40  
Riversdal  
6670  
[SKINNERJAN1@GMAIL.COM](mailto:SKINNERJAN1@GMAIL.COM)

Two Fruit Baskets Pty Ltd  
PO Box 95083  
Waterkloof  
0149  
[DENNIS.VOSSIE@GMAIL.COM](mailto:DENNIS.VOSSIE@GMAIL.COM)

Wegwyzers Fontein (Pty) Ltd  
201 Glein Eagles Drive  
Silverlakes Gold Estate  
Silverwoods Country Estate  
0081  
[NEILSMIT@YMAIL.COM](mailto:NEILSMIT@YMAIL.COM)

PJ and W Zietsman Familie Trust  
PO Box 340  
Riversdal  
6670  
[ZIETSMAN@WISPERNET.CO.ZA](mailto:ZIETSMAN@WISPERNET.CO.ZA)

## NOTICE SENT TO LANDOWNER AND DIRECT NEIGHBOURS WITH PROOF



### **PUBLIC PARTICIPATION PROCESS**

#### **PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

In terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) notice is given that the public participation process is hereby commenced by **Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine to conduct zeolite and bentonite prospecting activities on cultivated agricultural land of Farm Wegwyzers Rivier RE/582 (77.17ha) near Riversdale, Western Cape with landowners' consent.**

**Location:** The property is situated approximately 8km northeast of the town Riversdale & north of the N2 national road towards Mossel Bay and can be accessed via gravel roads leading to the Goedegun Primary School within the area known as Klein Kruisrivier

#### **Listed Activities:**

Activity No(s):	Describe the relevant activities in writing as per <b>Listing Notice 1</b> (as amended by GN 517 of 11 June 2021)	Describe the portion of the development as per the project description that relates to the applicable listed activity
20	<b>Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice or in Listing Notice 3 of 2014, required to exercise the prospecting right.</b>	Bentonite and zeolite prospecting activities as proposed for which a prospecting right is required.

**Procedure:** A basic assessment process will be applied to the application.

**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register their interest in the process or provide written comments to Enviro-EAP [Johmandie Pienaar (EAP)] within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. Further information can be obtained from the contact person indicated in this notice.

**Each landowner must please ensure that all persons residing on his/her property are informed of the notice for prospecting right application, and opportunity to register as an interested and affected party.**

**DATE OF NOTICE: 18 APRIL 2024**





**Map 1:** Location of Farm Wegwyzersrivier RE/582 near Riversdale in the Western Cape on which bentonite and zeolite prospecting activities are proposed.

**Contact Person:** Johmandie Pienaar  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
Cell: 072 240 3092  
Fax: 086 435 4691  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)  
Postal Address: Enviro-EAP, PO Box 205, Agulhas, 7287



Enviro-EAP (Pty) Ltd  
Reg: 2019/435233/07  
Director: Nicolaas Hanekom  
EAP's: Johmandie Pienaar & Lauren Abrahams



Office: +27 (0) 76 963 6450  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)



Postal Address:  
School Str 2  
Agulhas  
South Africa  
7287

**From:** Johmandie Pienaar

**Sent:** Thursday, April 18, 2024 11:42 AM

**Cc:** Admin [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Bcc:** skinnerjan1@gmail.com; Dennis Nel <dennis.vossie@gmail.com>; zietsman@wispnet.co.za; gp.rensburg@gmail.com; gprensburg@gmail.com; Marilize Nel <marilize.dk@gmail.com>; Charl <charlniekerk@absamail.co.za>; Wiehan Van Niekerk [wiehanvn1@gmail.com](mailto:wiehanvn1@gmail.com); [neilsmit@ymail.com](mailto:neilsmit@ymail.com)

**Subject:** Direct Neighbours Notice - PUBLIC PARTICIPATION PROCESS FOR PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

Good day

You receive this notice as an identified landowner of property directly bordering unto the proposed application property which is Farm Wegwyzers Rivier RE/582 near Riversdal, Western Cape.

## **PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

In terms the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) notice is given that the public participation process is hereby commenced by **Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine to conduct zeolite and bentonite prospecting activities on cultivated agricultural land of**

**Farm Wegwyzers Rivier RE/582 (77.17ha) near Riversdale, Western Cape with landowners' consent.**

**Location:** The property is situated approximately 8km northeast of the town Riversdale & north of the N2 national road towards Mossel Bay and can be accessed via gravel roads leading to the Goedgegun Primary School within the area known as Klein Kruisrivier

**Listed Activities:**

Activity No(s):	Describe the relevant activities in writing as per <b>Listing Notice 1</b> (as amended by GN 517 of 11 June 2021)	Describe the portion of the development as per the project description that relates to the applicable listed activity
20	<b>Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice or in Listing Notice 3 of 2014, required to exercise the prospecting right.</b>	Bentonite and zeolite prospecting activities as proposed for which a prospecting right is required.

**Procedure:** A basic assessment process will be applied to the application.

**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register their interest in the process or provide written comments to Enviro-EAP [Johmandie Pienaar (EAP)] within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. Further information can be obtained from the contact person indicated in this notice.

**Each landowner must please ensure that all persons residing on his/her property are informed of the notice for prospecting right application, and opportunity to register as an interested and affected party.**

**DATE OF NOTICE: 18 APRIL 2024**



**Map 1:** Location of Farm Wegwyzersrivier RE/582 near Riversdale in the Western Cape on which bentonite and zoelite prospecting activities are proposed.

**Contact Person:** Johmandie Pienaar

Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP, PO Box 205, Agulhas, 7287

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

## NOTICE PLACED ON BOUNDARY OF SITE WITH PHOTOGRAPHIC PROOF



### **PUBLIC PARTICIPATION PROCESS**

#### **PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

In terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) notice is given that the public participation process is hereby commenced by **Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine to conduct zeolite and bentonite prospecting activities on cultivated agricultural land of Farm Wegwyzers Rivier RE/582 (77.17ha) near Riversdale, Western Cape with landowners' consent.**

**Location:** The property is situated approximately 8km northeast of the town Riversdale & north of the N2 national road towards Mossel Bay and can be accessed via gravel roads leading to the Goedgedun Primary School within the area known as Klein Kruisrivier

#### **Listed Activities:**

Activity No(s):	Describe the relevant activities in writing as per <b>Listing Notice 1</b> (as amended by GN 517 of 11 June 2021)	Describe the portion of the development as per the project description that relates to the applicable listed activity
20	<b>Any activity including the operation of that activity which requires a prospecting right in terms of section 16 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in this Listing Notice or in Listing Notice 3 of 2014, required to exercise the prospecting right.</b>	Bentonite and zeolite prospecting activities as proposed for which a prospecting right is required.

**Procedure:** A basic assessment process will be applied to the application.

**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register their interest in the process or provide written comments to Enviro-EAP [Johmandie Pienaar (EAP)] within 30 days of this notice. The project title, your full name, contact details, plus indication of any direct business, financial, personal, or other interest you may have in this application must please be provided and fully described. Further information can be obtained from the contact person indicated in this notice.

**Each landowner must please ensure that all persons residing on his/her property are informed of the notice for mining right application, and opportunity to register as an interested and affected party.**

**DATE OF NOTICE: 22 MARCH 2024**






**Map 1:** Location of Farm Wegwyzersrivier RE/582 near Riversdale in the Western Cape on which bentonite and zoelite prospecting activities are proposed.

**Contact Person:** Johmandie Pienaar  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
Cell: 072 240 3092  
Fax: 086 435 4691  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)  
Postal Address: Enviro-EAP, PO Box 205, Agulhas, 7287

 Enviro-EAP (Pty) Ltd  
Reg: 2019/435233/07  
Director: Nicolaas Hanekom  
EAP's: Johmandie Pienaar & Lauren Abrahams

 Office: +27 (0) 76 963 6450  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

 Postal Address:  
School Str 2  
Agulhas  
South Africa  
7287

---







## **NOTICE PLACED IN LOCAL NEWSPAPER AND PROOF OF PLACEMENT**

### **PUBLIC PARTICIPATION PROCESS**

#### **PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

In terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) notice is given that the public participation process is hereby commenced by **Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine** to conduct **zeolite and bentonite prospecting activities on cultivated agricultural land of Farm Wegwyzers Rivier RE/582 (77.17ha) near Riversdale, Western Cape with landowners' consent.**

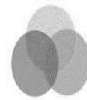
**Location:** The property is situated approximately 8km northeast of the town Riversdale & north of the N2 national road towards Mossel Bay and can be accessed via gravel roads leading to the Goedgegun Primary School within the area known as Klein Kruisrivier.

**Listed Activities:** Listing Notice 1 - Listed Activity 20

**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register interest for the respective application within the process or provide written comments to Enviro-EAP within 30 days of this notice (excluding public holidays). The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

**Contact:** Johmandie Pienaar  
PO Box 205, Agulhas, 7287  
Cell: 072 240 3092  
Fax: 086 435 4691  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)



**Enviro-EAP**  
Environmental Consultants



**PUBLIC PARTICIPATION PROCESS**  
**PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

In terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) notice is given that the public participation process is hereby commenced by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine to conduct zeolite and bentonite prospecting activities on cultivated agricultural land of Farm Wegwyzers Rivier RE/582 (77.17ha) near Riversdale, Western Cape with landowners' consent.

**Location:** The property is situated approximately 8km northeast of the town Riversdale & north of the N2 national road towards Mossel Bay and can be accessed via gravel roads leading to the Goedgegun Primary School within the area known as Klein Kruisrivier.

**Listed Activities:** Listing Notice 1 - Listed Activity 20  
**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register interest for the respective application within the process or provide written comments to Enviro-EAP within 30 days of this notice (excluding public holidays). The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

**Contact:** Johmandie Pienaar  
 PO Box 205, Agulhas, 7287  
 Cell: 072 240 3092  
 Fax: 086 435 4681  
 Email: admin@enviro-eap.co.za





**Polisie-golfers wen toernooi**

Sers. Garnet Damans van Riversdal-polisie was 'n lid van die Suid-Afrikaanse Polisiediens (SAPD) se nasionale span wat die intermagte golftoernooi in Port Shepstone gewen het. Hy het alle weldoeners en skenkers in Riversdal bedank vir hul finansiële bydraes wat hom in staat gestel het om aan die toernooi deel te neem. Foto verskaf

**HESSEQUA**  
 Plaaslike Munisipaliteit

**PROPOSED AMENDMENT OF HESSEQUA MUNICIPALITY MUNICIPAL CODE (BY-LAWS)**

In terms of the Constitution of the Republic of South Africa, the Municipality has executive powers and the right to administer local government matters.

The Municipality may thus draft policies and promulgate by-laws to administer its powers efficiently.

During the Council Meeting held on 27 May 2020 Council confirmed their intention to incorporate and adopt the following by-law as part of the municipal code:

- Integrated Waste Management By-law**

The by-law is open for inspection and for comments on the municipal website, ([www.hessequa.gov.za](http://www.hessequa.gov.za)) and at the Municipal Offices and Libraries in Riversdale, Heidelberg, Albertinia, Slangrivier, Gouitsmond, Witsand and Still Bay.

Comments on the amended By-Law can be submitted from 22 March 2024 to 12 April 2024 to reach the Municipal Manager, P.O. Box 29, Riversdale, 6670, or via e-mail: [deon@hessequa.gov.za](mailto:deon@hessequa.gov.za) or [annalizev@hessequa.gov.za](mailto:annalizev@hessequa.gov.za), not later than 12 April 2024 at 15h30.

In terms of section 21(4) of the Local Government: Municipal Systems Act, No. 32 of 2000, notice is hereby given that people who are unable to read or write are encouraged to visit the Municipal Offices during ordinary office hours, where they will be assisted by Legal Services personnel to formulate their written comments.

Further information can be obtained from Mr D Lewis - Michaels at telephone number 028 713 8027 or by e-mail: [deon@hessequa.gov.za](mailto:deon@hessequa.gov.za) or Ms A Vries at telephone number 028 713 8078 or by e-mail: [annalizev@hessequa.gov.za](mailto:annalizev@hessequa.gov.za)

**MR ASA DE KLERK**  
 MUNICIPAL MANAGER

**HESSEQUA**  
 Local Municipality

**TENDER NOTICE**

Notice is hereby given that the following tender is advertised on Hessequa Municipality's website at [www.hessequa.gov.za](http://www.hessequa.gov.za) and on the municipal notice boards at our offices in Riversdale, Heidelberg, Albertinia and Still Bay:

- HES-PLAN 02/2324: THE APPOINTMENT OF A SUITABLE SERVICE PROVIDER TO HOST AND MAINTAIN THE HESSEQUA TOURISM WEBSITE AND THE HESSEQUA MUNICIPAL WEBSITE FOR A PERIOD OF THREE (3) YEARS**
- HES-PLAN 02/2324: DIE AANSTELLING VAN 'N GESKIKTE DIENSTVERSKAFFER OM DIE HESSEQUA MUNISIPALITEIT SE WEBWERF BY WWW.HESSEQUA.GOV.ZA EN OP DIE MUNISIPALE KANTORSGEWINGBOARDE BY ONSE KANTORE IN RIVERSDAL, HEIDELBERG, ALBERTINIA EN STILBAAI GEADJESKEUR WORD.**

Prospective suppliers may also contact Leanne Windvogel by tel. (028) 713 8087 or e-mail: [leanne@hessequa.gov.za](mailto:leanne@hessequa.gov.za) to obtain the electronic version of the detailed advert.

**A.S.A DE KLERK**  
 MUNICIPAL MANAGER

**HESSEQUA**  
 Plaaslike Munisipaliteit

**TENDERKENNISGEWING**

Kennis geskied hiermee dat die volgende tender op Hessequa Munisipaliteit se webwerf by [www.hessequa.gov.za](http://www.hessequa.gov.za) en op die munisipale kantorsgewingboarde by ons kantore in Riversdal, Heidelberg, Albertinia en Stilbaai geadvertiseer word:

- HES-PLAN 02/2324: DIE AANSTELLING VAN 'N GESKIKTE DIENSTVERSKAFFER OM DIE HESSEQUA TOERISME WEBTUISTE EN HESSEQUA MUNISIPALE WEBTUISTE TE HUISVES EN ONDERHOU VIR 'N PERIODE VAN DRIE (3) JAAR**

Voormennende verskaffers kan ook vir Leanne Windvogel by tel. (028) 713 8087 of e-pos: [leanne@hessequa.gov.za](mailto:leanne@hessequa.gov.za) kontak om 'n elektroniese weergawe van die gedetailleerde advertensie te bekom.

**A.S.A DE KLERK**  
 MUNISIPALE BESTUURDER

**HESSEQUA**  
 Plaaslike Munisipaliteit

**VOORGESTELDE WYSIGING VAN HESSEQUA MUNISIPALITEIT MUNISIPALE KODE (VERORDENINGE)**

Die Munisipaliteit het uitvoerende gesag ten opsigte van die reg op administrasie van plaaslike regeeringsaanleenthede wat in die Grondwet van die Republiek van Suid Afrika aan hom opgedra is.

Die Munisipaliteit kan dus beleide opstel en verordeninge uitvaardig en administreer vir die doeltreffende administrasie van sy bevoegdhede.

Tydens die Raadsvergadering gehou op 27 Mei 2020 het die Raad hul voorneme bevestig om die volgende verordening as deel van die munisipale kode te inkorporeer en aan te neem:

- Verordening insake Geïntegreerde Afvalbestuur**

Die verordening is op die munisipale webwerf, ([www.hessequa.gov.za](http://www.hessequa.gov.za)) en by al die Munisipale Kantore en Biblioteke in Riversdal, Heidelberg, Albertinia, Slangrivier, Gouitsmond, Witsand and Stilbaai ter insae, vir die lewering van enige kommentaar, vanaf 22 Maart 2024 tot 12 April 2024 om die Munisipale Bestuurder, Posbus 29, Riversdal, 6670 of e-pos: [deon@hessequa.gov.za](mailto:deon@hessequa.gov.za) of [annalizev@hessequa.gov.za](mailto:annalizev@hessequa.gov.za), nie later as 12 April 2024 om 15h30 te bereik nie.

Ingevolge artikel 21(4) van die Wet op Plaaslike Regering: Wet op Munisipale Stelsels, No. 32 van 2000, word kennis hiermee gegee dat persone wat nie kan lees of skryf nie aangemoedig word om gedurende gewone kantoorure die Munisipale Kantore te besoek, waar daar ondersteuning gelewer sal word deur 'n Regsdienste personeelid om die kommentaar skriftelik te formuleer.

Verdere inligting is by Mnr D Lewis - Michaels beskikbaar by telefoonnommer 028 713 8027 of e-pos: [deon@hessequa.gov.za](mailto:deon@hessequa.gov.za) en by Me. A Vries by telefoonnommer 028 713 8078 of e-pos: [annalizev@hessequa.gov.za](mailto:annalizev@hessequa.gov.za)

**MR ASA DE KLERK**  
 MUNICIPAL MANAGER

**PUBLIC PARTICIPATION PROCESS**  
**PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEIDELAND RE/641 NEAR HEIDELBERG, WESTERN CAPE**



In terms of the Environmental Impact Assessment (EIA) Regulations (2014, as amended) made under Section 24 (5) and 44 of the National Environmental Management Act (NEMA), Act No. 107 of 1998 (as amended) notice is given that the public participation process is hereby commenced by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine to conduct zeolite and bentonite prospecting activities on cultivated agricultural land of Farm Weideland RE/641 (1152ha) near Heidelberg, Western Cape with landowners' consent.

**Location:** The property is situated approximately 8km northwest of the town Heidelberg and can be accessed via Port Beaufort Street gravel road leading off the N2 towards Cape Town.

**Listed Activities:** Listing Notice 1 - Listed Activity 20  
**Exemption:** No application for any exemption is sought.

**Opportunity to participate:** Interested and Affected Parties are invited to register interest for the respective application within the process or provide written comments to Enviro-EAP within 30 days of this notice (excluding public holidays). The project title, your full name, contact details, plus indication of any direct business, financial, personal or other interest you may have in this application must please be provided and fully described.

**Contact:** Johmandie Pienaar  
 PO Box 205, Agulhas, 7287  
 Cell: 072 240 3092  
 Fax: 086 435 4681  
 Email: admin@enviro-eap.co.za

**CAREER OPPORTUNITIES**

*Garden Route*

Garden Route District Municipality in the Western Cape is fully committed to Employment Equity.

Applications are invited for the following vacancies in the Roads and Transport Planning Services Department.

**SENIOR OPERATIONAL SUPERVISOR: MAINTENANCE (OUDTSHOORN)**  
 Basic Salary: R213 696.00 – R277 404.00 per annum (T8)  
 Notice no. 155/2023

**&**

**GENERAL ATTENDANT/ GRADER ASSISTANT: MAINTENANCE (OUDTSHOORN/ MOSSEL BAY / VAN WYKSDORP X2)**  
 Basic Salary: R121 560.00 – R153 324.00 per annum (T4)  
 Notice no. 16/2024; 17/2024 & 18/2024

**&**

**SUPERINTENDENT: MAINTENANCE (OUDTSHOORN)**  
 Basic Salary: R377 536.00 – R490 104.00 (T12)  
 Notice no. 19/2024

**&**

**RE-ADVERTISEMENT SENIOR SUPERVISOR: MAINTENANCE (VAN WYKSDORP)**  
 Basic Salary: R213 696.00 – R277 404.00 per annum (T8)  
 Notice no. 25/2024

**&**

**RE-ADVERTISEMENT SENIOR ARTISAN: MECHANICAL (RIVERSDALE X1)**  
 Basic Salary: R319 812.00 – R 415 140.00 per annum (T11)  
 Notice no. 27/2024

The detailed advertisement will be available on the Garden Route District Municipality's website at [www.gardenroute.gov.za](http://www.gardenroute.gov.za) or (<http://http://www.gardenroute.gov.za/vacancies>)

Enquiries: Ms Michelle Smit, Tel: 044 803 1324 or 1388/1362/1403/1327  
 Closing date: **Friday, 05 April 2024 before 13:30**

Candidates must be willing to be subjected to a criminal record check.

Candidates with disabilities are encouraged to apply.

**HELP IS AVAILABLE**

Suicide Crisis Helpline  
**0800 567 567**

Speak with a counsellor today



**LANDOWNER'S CONSENT WHICH WAS ORIGINALLY SIGNED BY LAND OWNER MR GERT VAN RENSBURG ON 09/02/20224 AND WITHDRAWN BY LANDOWNER MR GERT VAN RENSBURG ON 14/10/2025 (REFER TO LANDOWNER CONSULTATION MEETING MINUTES ATTCHED BELOW)**

**LANDOWNER CONSENT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING ACTIVITIES ON WEGWYZERS RIVIER  
582  
KLEINKRUIS RIVIER, WESTERN CAPE**

**LANDOWNER CONTACT INFORMATION**

Name of land owner	Gert Janse van Rensburg		
Trading name (if any):	Van Rensburg Trust		
Contact person:	Gert van Rensburg		
Physical address:	Wegwyzersrivier Rivierdal		
Postal address:	Kleinkruis 331		
Postal code:	6670	Cell:	
Telephone:	0825698378	Fax:	-
E-mail:	g.vansensburg@gmail.com		
If there is more than one landowner, please attach a list of their contact details to this application and tick the box			
		NA	Extra page attached

**CONSENT**

1. I/we the undersigned (insert the name/s of the owner/s of the land/and representative authorised to sign on behalf of landowner if applicable)

Gert Petrus Janse van Rensburg

of identity number/registration number (insert the owner/s or representative/s ID number/s or the registration number of the legal entity)

5507255126087

am/ are the registered owner/s of the property (insert description of the property/ies and title deed numbers)

Wegwyzers Rivier RE582 Title Deed Nr ..... *[Signature]*

located at (insert physical address or a brief description of the location of the property)

Kleinkruis rivier (8km northeast of the town Riversdale & north off the N2 national road towards Mossel Bay and can

be accessed via the Goedgegun Primary)

2. I/ we hereby give consent to the applicant (insert the name/s of the applicant/s)

*Imerys Refractory Minerals South Africa (Pty) Ltd - trading as Cape Bentonite Mine*

of identity number/registration number (insert the owner/s ID number/s or the registration number of the legal entity)

1973/012351/07

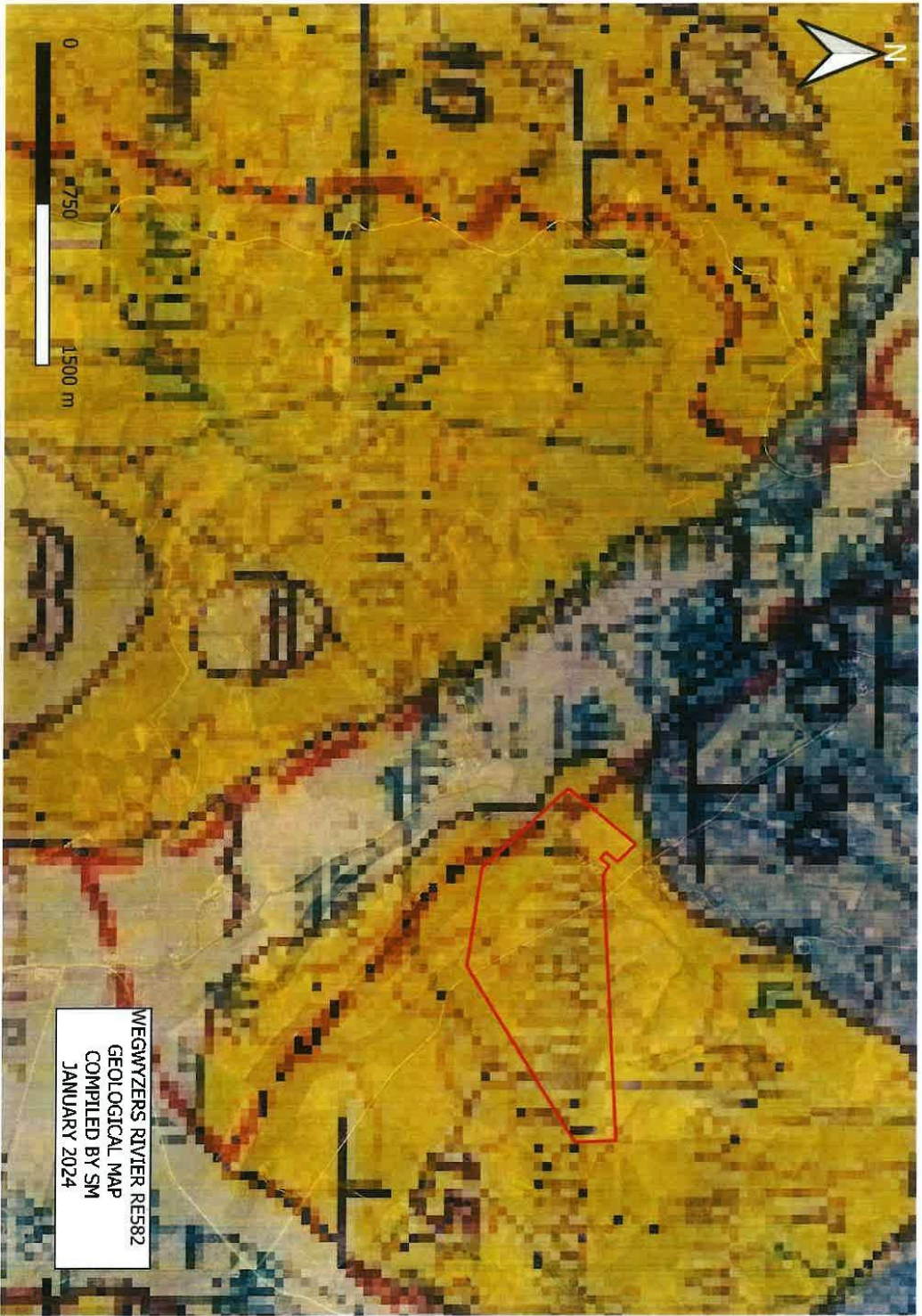
to undertake the following activity/ies on the property (insert a brief description of the project and identified activity/ies that will be applied for):

<b>NAME OF ACTIVITY</b>	<b>Aerial extent of the Activity Ha or m<sup>2</sup></b>	<b>LISTED ACTIVITY</b> Mark with an X where applicable or affected.	<b>APPLICABLE LISTING NOTICE</b> (GNR 983, GNR 984 or GNR 985)
Conduct bentonite and zeolite prospecting activities on cultivated agricultural land as proposed on Farm WEGWYZERS RIVIER RE582	Total property size-77Ha	X	GNR 983, Activity no: 12, 20 and 28

Signature of land owner or authorised representative 

Name of authorised person if the landowner is a legal entity Gert Petrus Jansen van Rensburg

Date 09/02/2024



**IMERY'S REFRACTORY MINERALS SOUTH AFRICA: CAPE BENTONITE MINE PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE  
DMRE Ref: WC30/5/1/1/2/10507PR**

**LANDOWNER CONSULTATION MEETING MINUTES**

**MEETING DATE AND TIME:** 14 October 2025 11:00 – 12:00am

**MEETING PLACE:** Gert van Rensburg (Landowner) homestead, Riversdale

**ATTENDANCE:**

- Johmandie Pienaar Environmental Assessment Practitioner from Enviro- EAP  
[johmandie@enviro-eap.co.za](mailto: johmandie@enviro-eap.co.za)
- Siyanda Mabaso Site Geologist Imerys Refractory Minerals  
[Siyanda.mabaso@imerys.com](mailto: Siyanda.mabaso@imerys.com)
- Gert Petrus Janse van Rensburg Landowner Farm Wegwyzers Rivier RE/582, Riversdale  
[gp.rensburg@gmail.com](mailto: gp.rensburg@gmail.com)

**REASON FOR MEETING AS DISCUSSED WITH LANDOWNER** – Mr. Van Rensburg as the landowner of farm Wegwyzers Rivier RE/582 signed a landowners consent on 09/02/2024 for Bentonite and Zeolite Prospecting Right application as submitted for Farm Wegwyzers Rivier RE/582. During the 30 day public participation held from 2 Sept – 2 Oct 2025 for the Draft Basic Assessment Report as distributed for the Bentonite and Zeolite Prospecting Right application submitted for Farm Wegwyzers Rivier RE/582, Riversdale one of the registered Interested and Affected Parties, Mr Dennis Nel provided comments on 02/10/2025 in which he stated that, *“Mr. Gert Janse van Rensburg, the owner of Wegwyzers Rivier RE/582 where the prospecting is proposed, is opposed to the mining activities on his own farm.”* He also stated that, *“Despite the landowner’s objection to mining on his property, IMERY’S continues to pursue prospecting rights without the property owner’s support.”*

As a reply from the EAP the following reasons are provided proving that the landowner Mr Gert Janse van Rensburg rights were not ignored. Signed landowner’s consent was obtained before any steps in the EA and Prospecting Right Application process commenced and signed landowner’s consent was included in the Pre-application Draft BAR and Draft BAR as obtained for proposed prospecting activities and signed by the landowner on 09/02/2024 (as per the signed landowners consent available in Appendix C of the BAR). The landowner is included as a registered interested and affected party throughout the process and did not provide any form of objection or comments to the EAP nor to the applicant to indicate or discuss that he wishes to withdraw his consent nor did he communicate to the EAP nor the applicant that he is opposed to the proposed prospecting activities.

Upon receiving the comments from Mr Dennis Nel on 02/10/2025 relating to the potential objection of the landowner to the proposed prospecting right a meeting was arranged with the landowner to discuss these matters, hence the reason for the meeting held with the landowner on 14 October 2025.

**MATTERS AS DISCUSSED –**

- Mr Van Rensburg (landowner) stated that he would like to put on record that Mr Dennis Nel did not personally communicate with him on this matter and Mr Van Rensburg also did not give Mr Nel permission to make these statements on his behalf.
- Mr Van Rensburg (landowner) stated that he wants to withdraw the original signed landowners consent dated 09/02/2024 due to the following reasons:
  - Mr Van Rensburg intends to sell the property Farm Wegwyzers Rivier RE/582 once the current rent contract expires during March 2027.
  - A potential buyer for Farm Wegwyzers Rivier RE/582 has indicated to Mr Van Rensburg that if he continues to consent to the proposed prospecting activities and a prospecting right is issued, then the potential buyer will withdraw their initial offer to buy Farm Wegwyzers Rivier RE/582.
- Mr Mabaso (applicant representative) requested whether or not Mr Van Rensburg can provide the contact details of the potential buyers so that the matter can be discussed with them, however Mr Van Rensburg (landowner) indicated that the potential buyer indicated to him that they do want to be contacted by the prospecting applicant and the potential buyer contact details may not be provided to the prospecting applicant.
- Mr Van Rensburg (landowner) stated that he did inform the potential buyer that with or without signed landowner’s consent the prospecting application can continue and he cannot prevent

anyone from applying for a prospecting right on his property because according to the law the state is the custodian of mineral rights.

- It was confirmed by Mrs Pienaar (EAP) that the landowner is aware of the fact that the prospecting application has been submitted with the original signed landowners consent and the prospecting application process is therefore underway, however a copy of the landowner consultation meeting minutes will be included in the basic assessment report as proof of consultation held with the landowner and that it will be indicated in the Basic Assessment Report, to be submitted to the decision making authority (Department of Mineral and Petroleum Resources), that the landowner withdraws his original signed landowners consent due to the reasons as provided within these meeting minutes.
- It was confirmed by Mrs Pienaar (EAP) that should a prospecting right be issued for the Farm Wegwyzers Rivier RE/582, the prospecting right holder would be required to consult with the relevant landowner on the way forward before implementation.
- The meeting minutes as taken by Mrs Pienaar (EAP) was read to all parties present and approved by signatures obtained and included below.

Geteeken: 14 Okt 2025

J. Pienaar

KL  
14/10/25

Siyanda

14.10.2025

---

## **PROOF OF REQUESTS RECEIVED FOR REGISTRATION AS INTERESTED AND AFFECTED PARTIES**

### **Registration request and comments I&AP 1:**

**From:** [REDACTED]

**Sent:** Monday, 15 April 2024 13:35

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PUBLIC PARTICIPATION PROCESS: PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

Dear Ms Pienaar

Please find attached hereto a notice regarding the above-mentioned public participation process.

We await your reply.

Regards

[REDACTED]

202, 2<sup>nd</sup> Floor, Clock Tower, V&A Waterfront, Cape Town, 8001 (Head Office Address)

[REDACTED]

ENVIRO-EAP

Environmental Consultants

Attention: Johmandie Pienaar

0722403092

Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

**PUBLIC PARTICIPATION PROCESS**

**PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Please confirm in writing before the expiry date of 22 April 2024, of the registration of the above-mentioned parties.

Regards



[Redacted]

[REDACTED]

**Registration request and comments I&AP 2:**

[REDACTED]

**Sent:** Monday, 15 April 2024 18:59

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

[REDACTED]

**Subject:** Public Participation - Wegwysers Rivier RE/582

ENVIRO-EAP

Environmental Consultants Attention: Johmandie Pienaar 0722403092

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

**Registration request and comments I&AP 3:**

[REDACTED]

**Sent:** Monday, 15 April 2024 20:40

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Registering as an IAP - PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE

Dear Ms Pienaar

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, and as an environmentally concerned property owner, I would like to know more and be kept informed of any meetings so that I can attend, and participate.

This communication serves as official notice to be registered as an interested and affected party and to be listed accordingly to receive all relevant info - and to be consulted with,

[REDACTED]

And also on behalf of the non profit company as detailed below.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Registration request and comments I&AP 4:**

[REDACTED]

**Sent:** Monday, 15 April 2024 22:02

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PUBLIC PARTICIPATION PROCESS - PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

Dear Ms Pienaar

**PUBLIC PARTICIPATION PROCESS**

**PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

I have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice that I would like to be registered as an

interested and affected party and to be listed accordingly to receive all relevant info and to be consulted with. My details are as follows:

[REDACTED]

Please confirm in writing before the expiry date of 22 April 2024, of my registration as an I&AP.

Regards,

[REDACTED]

**Registration request and comments I&AP 5:**

[REDACTED]

**Sent:** Monday, 15 April 2024 22:37

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PUBLIC PARTICIPATION PROCESS - PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

Dear Ms Pienaar

**PUBLIC PARTICIPATION PROCESS**

**PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

I have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice that I would like to be registered as an interested and affected party and to be listed accordingly to receive all relevant info and to be consulted with. My details are as follows:

[REDACTED]

Please confirm in writing before the expiry date of 22 April 2024, of my registration as an I&AP.

Regards,

[REDACTED]

**Registration request and comments I&AP 6:**

**Sent:** Monday, 15 April 2024 22:58

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PUBLIC PARTICIPATION PROCESS - PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

I have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice that I would like to be registered as an interested and affected party and to be listed accordingly to receive all relevant info and to be consulted with. My details are as follows:

[REDACTED]

Please confirm in writing before the expiry date of 22 April 2024, of my registration as an I&AP.

Regards,

[REDACTED]

**Registration request and comments I&AP 7:**

[REDACTED] [nicky.hein@gmail.com](mailto:nicky.hein@gmail.com)

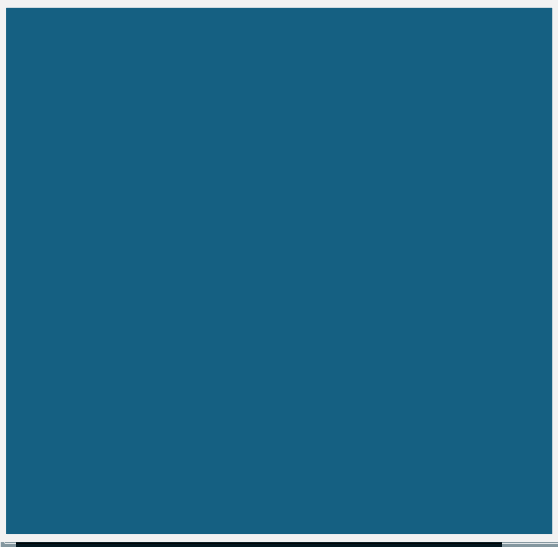
**Sent:** Monday, April 15, 2024 4:10 PM

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** riversdale resident

hello

im not sure what to do, but I live in Riversdale and would like to register as an affected party please



[Redacted]

[Redacted]

[Redacted]

**Registration request and comments I&AP 8:**

[Redacted]

**Sent:** Tuesday, 16 April 2024 11:40

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Subject:** Re: Registrasie van belanghebbende party: mynbedrywighe in Riversdal

ENVIRO-EAP

Environmental Consultants Attention: Johmandie Pienaar 0722403092

Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS

[Redacted]

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

**Registration request and comments I&AP 9:**

[REDACTED]

Sent: Tuesday, 16 April 2024 15:33

To: Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

Subject: Request to register as affected party - Riversdale/Heidelberg

Good afternoon Johmandie

Thank you for all the information you provided on the phone.

We are farm owners between Riversdale and Heidelberg. We have just found out about the proposed prospecting and mining in our area.

I would like to please register as an interested or affected party for the following projects and any other projects that may come up in this area.

WEGWYZERS RIVIER

RE/582

Near Riversdale

ZEEKOEKRUIS

NR 651

Near Riversdale

Remainder of FARM KRAGGA

RE/593

Near Riversdale

FARM WEIDELAND

RE/641

Near Heidelberg

Sincerely,

[REDACTED]

**Registration request and comments I&AP 10:**

[REDACTED]

To:

ENVIRO-EAP

Environmental Consultants

Att: Johmandie Pienaar

cell: 072 240 3092

e-mail: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

## PUBLIC PARTICIPATION PROCESS

### PROJECT TITLE PROPOSED BENTONITE AND ZEOLITE PROSPECTING ON FARM WEGWYZERSRIVIER RE/582 NEAR RIVERSDALE WESTERN CAPE

The prospecting proposed in the aforesaid notice and any subsequent mining activities will greatly impact on the area in which the above trust and myself and the members of the trust have an interest. This communication is the official notice to register as interested and affected parties the following:

1.

[REDACTED]

2.

[REDACTED]

[REDACTED]

A financial interest

Please confirm in writing before the expiry date of 22 April 2024 of the registration of the abovementioned parties as interested parties.

Yours faithfully

[REDACTED]

16 April 2024

#### **Registration request and comments I&AP 11:**

[REDACTED]

**Sent:** Tuesday, 16 April 2024 18:36

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Subject:** Registrasie van belanghebbende party: mynbedrywighe in Riversdal

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS

[REDACTED]

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with.

[REDACTED]

**Registration request and comments I&AP 12:**

[REDACTED]

**Sent:** Tuesday, 16 April 2024 18:58

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:**

ENVIRO-EAP

Environmental Consultants Attention: Johmandie Pienaar 0722403092

Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS

[REDACTED]

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

**Registration request and comments I&AP 13:**

[REDACTED]

**Sent:** Wednesday, 17 April 2024 08:16

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

[REDACTED]

**Subject:** Public Participation - Bentonite/Zeolite prospecting

Hi,

Please see attached the registration as interested party for the proposed Bentonite and Zeolite mining in Riversdale.

Please let me know if there is any additional information required.

Regards

[Redacted signature]

[Redacted signature]

17 April 2024 Enviro-EAP Environmental Consultants 072 2403 092 Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

ATTENTION : JOHMANDIE PIENAAR RE: PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTER CAPE

Dear Ms Pienaar,

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the proposed mining activities in our area.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as an official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant information and to be consulted with, for the following parties:

[Redacted party name]

[Redacted party name]

[Redacted party name]

[Redacted party name]

Please confirm if any addition information is required to register the parties.

**Registration request and comments I&AP 14:**

[Redacted signature]

Sent: Wednesday, April 17, 2024 10:26 AM

To: Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas

Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Navraag van Suid-Kaap FORUM

Vir aandag: Johmandie Pienaar

Beste Johmandie

Dit het via [REDACTED] op Riversdal onder my aandag gekom van moontlike prospektering op drie plase in die Hessequa-omgewing.

1. Wie wil wat ontgin?

*Die aansoeker ivm die projekte soos hierbo gelys is Imerys Refractory Minerals SA (Cape Bentonite Mines). Wat 'n myn maatskapy is wie al vir baie jare bentoniet en zeoliet (in tiepe klei) op verskeie plase rondom die Heidelberg en Riversdal omgewing myn.*

2. Watter plase en gebiede is in die gedrang?

*Verwys asb na die aansoeke soos hierbo gelys wat die eiendomme soos per huidige aktiewe aansoeke aandui. Let wel hierdie aansoeke word tans met toestemming van die betrokke grondeienaars gedoen.*

3. Hoe gaan dit die omgewing en gemeenskappe beïnvloed?

*Potensiele inpakte word geassesser tydens die omgewingsinpakstudies waarmee ons tans besig is. Sodra die omgewingsinpakstudie verslae beskikbaar raak vir kommentaar stuur ek dus vir U die kennisgewing wat U verwys na ons publieke deelname web blad waar U (en alle geregistreerde geaffekteerde partye) die verslae kan aflaai en besigtig vir kommentaar binne die wetlike tydperk. Indien die regte goedgekeur word geskied die prospektering en/of myn van bentoniet en zeoliet onder streng maatreels in terme van omgewingsbestuur en rehabilitasie wat ook deur onafhanklike partye gekontroleer word en geen prospektering of myn regte in hierdie verband word voorgestel op enige natuurlike areas nie slegs reeds bewerkte lande wat gerehabiliteer moet word om weer te kan gebruik word as bewerkte lande sodra alle prospektering en/of mynwerke voltooi is.*

4. Kan inwoners nog iets doen om dit te stuit: en hoe?

*Ek is 'n onafhanklike konsultant en kan nie daarop kommentaar lewer of inwoners iets kan doen om dit te stuit of al dan nie. Enige iemand is welkom om te registreer as belanghebbende party op die aansoeke en sal dieselfe kennisgewings ontvang om kans te kry om kommentaar te lewer tydens die geskrewe tydperk op die aansoeke indien hul geregistreer het terwyl die aansoek nog aan die gang is en tydens die tydperke wat deur die wet bepaal word. Die verslae waarna ek verwys verduidelik ook die publieke deelname prosesse ens.*

Ek sal dit opreg waardeer as jy hierop kan reageer en meer inligting kan verskaf.

Met groot waardering

[REDACTED]

**Registration request and comments I&AP 15:**

[REDACTED]

**Sent:** Wednesday, 17 April 2024 08:51

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

[REDACTED]

**Subject:** Voorgenome aansoek om bentoniet te myn

Hi Johmandie



AND ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

Please confirm in writing before the expiry date of 22 April 2024, of the registration.

Regards

[REDACTED]

17 April 2024

**Registration request and comments I&AP 18:**

[REDACTED]

**Sent:** Wednesday, 17 April 2024 12:30

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PUBLIC PARTICIPATION PROCESS - IMERY BENTONITE

Dear Mrs Pienaar,

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDALE, WESTERN CAPE FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE

AND

ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for

the following:

[Redacted]

Please confirm in writing before the expiry date of 22 April 2024, of the registration.

Regards

[Redacted]

17 April 2024

**Registration request and comments I&AP 19:**

[Redacted]

**Sent:** Wednesday, 17 April 2024 14:07

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Public Participation Process Proposed Bentonite & Zeolite Prospecting/Mining Riversdale Western Cape

Dear Ms Pienaar

Kindly see attached document requesting to be registered as Interested and Affected Parties

Regards

[Redacted]

[Redacted signature block]

Dated: 17 April 2024

ENVIRO -EAP

Environmental Consultants

Att: Johmandie Pienaar

PH: 0722403092

Email: admin#enviro-eap.co.za

Dear Ms Pienaar

Public Participation Process

Project Title: Proposed Bentonite & Zeolite prospecting on Farm Wegwyzers Rivier

RE/582 Near Riversdale, Western Cape

**AND**

Public Participation Process

Project Title: Proposed Bentonite & Zeolite Mining on Farm Zeekoekruis NR 651 Near Riversdale, Western Cape

**AND**

Any other Prospecting or Mining Activities in or near Riversdale, Western Cape

We have taken note of your public notification to invite interested parties to register for public participation process regarding the intended prospecting/mining by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine

As any prospecting and or mining would activities would greatly impact on the area in numerous ways, such as infrastructure and services, traffic, existing land rights and zoning, safety and environmental impact, its is important that the rights of affected parties be taken note of.

This communication serves as official notice to be registered as interested and affected parties.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Registration request and comments I&AP 20:**

[REDACTED]

**Sent:** Wednesday, 17 April 2024 19:48

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Mining threat to the overberg

Dear Ms Pienaar,

We would like to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

We reside at [REDACTED] district  
Riversdale.

We strongly oppose any mining activities in the area, the destruction of the environment is a violation of nature and cannot be allowed.

Kind regards

[REDACTED]

[REDACTED]

**Registration request and comments I&AP 21:**

[REDACTED]

**Sent:** Wednesday, 17 April 2024 21:25

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Public Interest Application in Response to Prospecting in the Riversdale area

Dear Ms Pienaar

Please find attached a letter with reference to the Public Participation process involving Bentonite and Zeolite prospecting in the Riversdale Area, Western Cape.

Regards,

[REDACTED]

[REDACTED]

ENVIRO-EAP Environmental Consultants Attention: Johmandie Pienaar 0722403092 Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

AND PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE MINING ON FARM ZEEKOEKRUIS NR 651 NEAR RIVERSDALE, WESTERN CAPE

AND PUBLIC PARTICIPATION PROCESS PROJECT TITLE: FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDALE, WESTERN CAPE

AND ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

[REDACTED]

Please confirm in writing, before the expiry date of 22 April 2024, the registration of the above-mentioned parties.

[REDACTED] CC 18 April 2024

**Registration request and comments I&AP 22:**

[REDACTED]

**Sent:** Thursday, 18 April 2024 09:20

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS

Dear Sir

Please find attached registration of public process

Kind regards

[REDACTED]

[REDACTED]

ENVIRO-EAP Environmental Consultants Attention: Johmandie Pienaar 0722403092 Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please confirm in writing before the expiry date of 22 April 2024, of the registration of the above mentioned parties.

[REDACTED] 16 April 2024.

**Registration request and comments I&AP 23:**

**From:** [REDACTED]

**Sent:** Thursday, 18 April 2024 20:30

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Bentolite and zeolite prospecting Riversdale

Goeiedag Johmandie

Vind asb aangeheg my aansoek om ingelig te word rakende die Bentoniet en zeoliet myn.

Groete

[REDACTED]

[REDACTED]

ENVIRO-EAP - Environmental Consultants

Attention: Johmandie Pienaar

0722403092

Per email: admin@enviro-eap.co.za

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

AND

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE MINING ON FARM ZEEKOEKRUIS NR 651 NEAR RIVERSDALE, WESTERN CAPE

AND

PROJECT TITLE: FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following

[REDACTED]

Please confirm in writing before the expiry date of 22 April 2024, of the registration.

Regards

[REDACTED]

17 April 2024

**Registration request and comments I&AP 24:**

[REDACTED]

**Sent:** Friday, 19 April 2024 12:46

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Registration: PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

ENVIRO-EAP  
Environmental Consultants  
Attention: Johmandie Pienaar  
0722403092

Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

Please confirm in writing before the expiry date of 22 April 2024, of the registration.

Regards

[REDACTED]

Dated: 19-04-2024

**Registration request and comments I&AP 25:**

F [REDACTED]

**Sent:** Friday, 19 April 2024 14:45

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

[REDACTED]

ENVIRO-EAP  
Environmental Consultants  
Attention: Johmandie Pienaar  
0722403092  
Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

Regarding:  
PUBLIC PARTICIPATION PROCESS  
PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

Please confirm in writing/email before the expiry date of 22 April 2024, of the registration.

Kind Regards,

[REDACTED]



PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

AND

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE MINING ON FARM ZEEKOEKRUIS NR 651 NEAR RIVERSDALE, WESTERN CAPE

AND

PROJECT TITLE: FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDALE, WESTERN CAPE

AND

ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE

I have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as qn interested and affected party and to be listed accordingly to receive all relevant information and to be consulted with, for the following:

[REDACTED]

As above

Please confirm in writing before the expiry date of 22 April 2024, of the registration.

Regards

[REDACTED]

20 April 2024

**Registration request and comments I&AP 28:**

[REDACTED]

**Sent:** Saturday, 20 April 2024 13:04

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE

ENVIRO-EAP  
Environmental Consultants  
Attention: Johmandie Pienaar  
0722403092

Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

Please confirm in writing before the expiry date of 22 April 2024, of the registration.

Regards

[REDACTED]

[REDACTED]

**Registration request and comments I&AP 29:**

[REDACTED]

**Sent:** Saturday, 20 April 2024 15:43

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

[REDACTED]

**Subject:** Johmandie Pienaar: REGISTER AS AFFECTED AND INTERESTED PARTIES FOR PROSPECTING AT FARM WEGWYZERS RIVER, RE/582 RIVERSDALE and other PROJECTS

[REDACTED]

19/04/2024

Dear Ms Pienaar,

This communication serves as official notice to be registered as interested and affected parties on all the projects as named below and to be listed accordingly to receive all relevant info and to be consulted with.

Could you register the following parties;

[REDACTED]

as affected and interested parties on the following project titles:

RE: PUBLIC PARTICIPATION PROCESS PROJECT TITLE:  
PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE,  
WESTERN CAPE

AND

PUBLIC PARTICIPATION PROCESS PROJECT TITLE:  
FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER  
OF FARM KRAGGA RE/592 NEAR RIVERSDALE, WESTERN CAPE

AND

ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE

Kindly confirm in writing receipt of this notice.

Kind regards,

[Redacted signature]

**Registration request and comments I&AP 30:**

[Redacted line]

**Sent:** Saturday, April 20, 2024 9:11 PM

**To:** Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Subject:** SUBJECT Request for registering as an effected party

[Redacted signature]

ENVIRO-EAP  
Environmental Consultants  
Attention: Johmandie Pienaar  
0722403092  
Per email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dear Ms Pienaar

PUBLIC PARTICIPATION PROCESS  
PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS  
RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE

AND

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE MINING ON FARM ZEEKOEKRUIS NR 651 NEAR RIVERSDALE, WESTERN CAPE

AND

PUBLIC PARTICIPATION PROCESS

PROJECT TITLE: FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDALE, WESTERN CAPE

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

[REDACTED]

[REDACTED]

Regards

**Registration request and comments I&AP 31:**

Via Phone call

[REDACTED]

**Registration request and comments I&AP 32:**

Via Phone call

[REDACTED]

[REDACTED]

[REDACTED]

**Registration request and comments I&AP 33:**

[REDACTED]

Sent: Monday, April 22, 2024 2:37 PM

To: Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas

Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Subject:** Registration of IAP

From: [REDACTED]

To: ENVIRO-EAP  
Environmental Consultants  
Attention: Johmandie Pienaar  
0722403092  
Per email: admin@enviro-eap.co.za

Dear Ms Pienaar

**PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE**

**&**

**PUBLIC PARTICIPATION PROCESS PROJECT TITLE: PROPOSED BENTONITE & ZEOLITE MINING ON FARM ZEEKOEKRUIS NR 651 NEAR RIVERSDALE, WESTERN CAPE**

**&**

**PUBLIC PARTICIPATION PROCESS  
PROJECT TITLE: FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDALE, WESTERN CAPE**

**&**

**ANY OTHER PROSPECTING OR MINING ACTIVITIES IN OR NEAR RIVERSDALE, WESTERN CAPE**

We have taken note of your public notification to invite interested and affected parties to register for the public participation process regarding the intended prospecting by Imerys Refractory Minerals South Africa t/a Cape Bentonite Mine.

As the prospecting itself, and any subsequent activities, would impact greatly on the area in numerous ways, such as infrastructure and services, traffic, human settlement, existing land rights and zoning, safety, environmental impact, etc., it is of utmost importance that the rights of affected parties be taken note of and duly be registered as such accordingly.

This communication serves as official notice to be registered as interested and affected parties and to be listed accordingly to receive all relevant info and to be consulted with, for the following:

[REDACTED]

Please confirm in writing receipt on this before the expiry date of 22 April 2024, of the registration.

Regards

[REDACTED]

**Registration request and comments I&AP 34:**

F [REDACTED]

**Sent:** Tuesday, 23 April 2024 14:35

To: Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

[REDACTED]

**Subject:** Bentonite & Zeolite prospecting on Farm Wegwyzersrivier RE/582, Riversdal - Public Participation

**Att: Ms Johmandie Pienaar, Enviro-EAP Environmental Consultants**

Dear Ms Pienaar,

Will you kindly register the [REDACTED] as an interested and affected party for the public participation process regarding the proposed prospecting on Wegwyzersrivier in Riversdale by Imerys Refractory Minerals SA (trading as Cape Bentonite Mine).

As the proposed prospecting and concomitant activities will have a major impact on the regional environment, the Association wishes to exercise its rights to be notified timeously of the mandatory public participation process and to receive all relevant information pertaining to the application.

With thanks,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Registration request and comments I&AP 35:**

[REDACTED]

**Sent:** Monday, 16 September 2024 20:15

**To:** Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

[REDACTED]

**Subject:** Register as I&AP

Dear Johmandie, I trust you are well.

I kindly refer to the attached notice.

Could you kindly register us as I&AP's for both the prospecting and Mining applications.

Can we also kindly request the following:

- Application form's
- Draft Scoping/Draft EIR's
- Regulation 2.2 Map/s
- Mining Work Programme/Prospecting Work Programme

Your assistance in this regard will be highly appreciated

Kind regards

**Registration request and comments I&AP 36:**

**Date:** Tuesday, 17 September 2024 at 23:54

**To:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>, [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za) <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>, [gerhard.gerber@westerncape.gov.za](mailto:gerhard.gerber@westerncape.gov.za) <[gerhard.gerber@westerncape.gov.za](mailto:gerhard.gerber@westerncape.gov.za)>, [pieter.swart@dmr.gov.za](mailto:pieter.swart@dmr.gov.za) <[pieter.swart@dmr.gov.za](mailto:pieter.swart@dmr.gov.za)>, [pumla.mntuyedwa@dmr.gov.za](mailto:pumla.mntuyedwa@dmr.gov.za) <[pumla.mntuyedwa@dmr.gov.za](mailto:pumla.mntuyedwa@dmr.gov.za)>, [willry.vanbreda@dmr.gov.za](mailto:willry.vanbreda@dmr.gov.za) <[willry.vanbreda@dmr.gov.za](mailto:willry.vanbreda@dmr.gov.za)>, [REDACTED]

**Subject:** 1st formal Written Objection Against the PA-DBAR for the Prospecting Application on the Farm Wegwyzers Rivier 582, Riversdale, Western Cape

Dear Johmandie

Kindly find attached 1<sup>st</sup> formal written objection against the PA-DBAR compiled for the proposed prospecting activities on the Farm Wegwyzers River 582, Riversdale, Western Cape.

This objection is lodged on behalf of [REDACTED]

Kindly confirm receipt of this objection and do not hesitate to contact writer if you have any queries regarding this document.

*(Copy of comments received on Pre-application Draft BAR available under PROOF OF COMMENTS RECEIVED ON PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT below)*

## Registration request and comments I&AP 37:

Sent: Tuesday, 10 September 2024 19:17

To: Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

Subject: Navraag: Beoogde prospekter- en mynbou in Hessequa

Goeienaand, Johmandie

Ek hoop dit gaan goed. Ek wil vra of jy asb. hiermee kan help?

Ek verstaan daar was vandag 'n ope dag oor beoogde bentoniet- en seoliet-prospekter- en mynaktiwiteite wat binne die gebied van Heidelberg- en Riversdal in Hessequa val.

Ek wil graag iets skryf om lesers in te lig presies waar sake staan en wat beoog word.

\*Mag ek vra watter gebied geraak word of waar presies watter beoogde bedrywighede sal plaasvind (sal dit graag op 'n kaart wil aandui).

Die kaarte wat elke gebied aandui wavoor aansoek gedoen word waarby Enviro-EAP betrokke is is beskikbaar vir aflaai op ons website soos per die link hierbo voorsien.

\*Wat presies behels die beoogde bedrywighede?

Beskrywings van wat beoog word vir elke aansoek is beskikbaar in die verslae vir aflaai op ons website soos per die link hierbo voorsien

\*Daar is boere wat bekommerd is oor watervoorsiening, asook die invloed op grondwater (daar is blykbaar baie ou ondergrondse fonteine naby van die beoogde gebiede)? Gaan of kan daar 'n invloed wees?

Geen water onttrekking sal gedoen word tydens die aktiwiteite soos voorgestel nie, ek verwys U na die inpakstudie verslae soos beskikbaar op ons website vir aflaai soos per die link hierbo voorsien.

\*In watter stadium is die projek tans en watter goedkeurings moet nog verkry word?

Elke omgewingsinpakstudie proses vir die verskeie aansoeke is huidiglik soos per die lys hierbo voorsien. Ons is slegs die omgewingskonsultante wat aangestel is om aansoek te doen namens die aansoeker vir omgewingsgoedkeuring en myn of prospekteringsregte soos per die lys voorsien.

\*Is 'n inpakstudie gedoen, en indien wel, is 'n geoloog en geo-hidroloog betrokke, spesifiek wat die ondergrondse waterbronne betref?

Omgewingsinpakstudie prosesse is onderweg soos per die lys voorsien, laai asb die verslae af op ons website om te bepaal wat tot op hede gedoen is vir elke aansoek.

\*Indien dit reeds gedoen is, is hul volle studiemateriaal beskikbaar, indien nog nie, sal dit beskikbaar gestel word?

Omgewingsinpakstudie prosesse is onderweg soos per die lys voorsien, laai asb die verslae af op ons website om te bepaal wat tot op hede gedoen is vir elke aansoek.

\*Is die departement van landbou bewus van hierdie beplande aktiwiteit, is daar 'n aansoek vir 'n waterlisensie? Waar gaan die water vandaan kom?

Ja nasionaal en provinsiaal departement van landbou word geken in die omgewingsaansoek prosesse en kry ook geleentheid vir kommentaar lewer tydens die prosesse, Asook waterwese word geken. Enigste water wat gebruik word is water vir dust management en dit is munisipale water wat gebruik word waarvoor die aansoeker/mine company self voor betaal. Hierdie inligting is in verslae beskikbaar vir aflaai op die link soos voorsien.

\*Weet die departement van omgewingsake hiervan, die Goukou-rivier is immers sowat 1,5 km van die beoogde mynsterrein?

Ja deprment van omgewingsake word ook geken en kry geleentheid vir kommentaar op all omgewingsinpakstudie verslae. Kommentare ontvang vanaf alle partye tot op hede vir die aansoeke is ook beskikbaar in die verslae.

\*Wat gaan die uitwerking op die Windsor-pad wees - daar is kommer omdat die pad reeds byna onbegaanbaar is en daar nie geld van plaaslike owerhede is om dit te hergruis nie.

Inpakte wat die myn bedrywighede moontlik mag hê word geassesseer in die verslae soos beskikbaar vir kommentaar en mitigering vir moontlike inpakte word deel van die omgewingsbestuursplan waaraan voldoen moet word.

\*Ek wil ook vra oor die voordele wat die beoogde projek vir die gemeenskap inhou?

Ek verwys U na die sosio-ekonomiese inpakte soos geassesseer in die verslae, daar is ook 'n Social Labour Plan aangeheg aan die verslae wat beter verduidelik wat die soso-ekonomiese voordele is wat die myn maatskappy aan die plaaslike gemeenskap bied.

Baie dankie vir die hulp. Indien moontlik mag ek asb. vra vir terugvoering teen Donderdagoggend om 08:00?

Weereens dankie,  
Groete eers

[Redacted]

[Redacted]



**Registration request and comments I&AP 38:**

[Redacted]

**Sent:** Tuesday, 05 November 2024 16:50

**To:** Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Subject:** Proposed prospecting near Heidelberg

Hi Johmandie

I would like to register as I&AP for the proposed bentonite and zeolite prospecting on the farm De Doorn Rivier 2/300 near Heidelberg. In addition, I saw the notices your company also placed for 2 or 3 other proposed mining applications (in the last month) for the areas surrounding Riversdal, Heidelberg, Swellendam and Stilbaai. I have lost those notices now but would greatly appreciate it if you can add me as I&AP for those proposed projects as well. I live in this area, thus my interest.

Regards

[Redacted]

**PROOF OF NOTICE/S SENT FOR 30 DAY COMMENTING PERIOD COMMENCED ON THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT AND PPP MEETING NOTIFICATIONS**

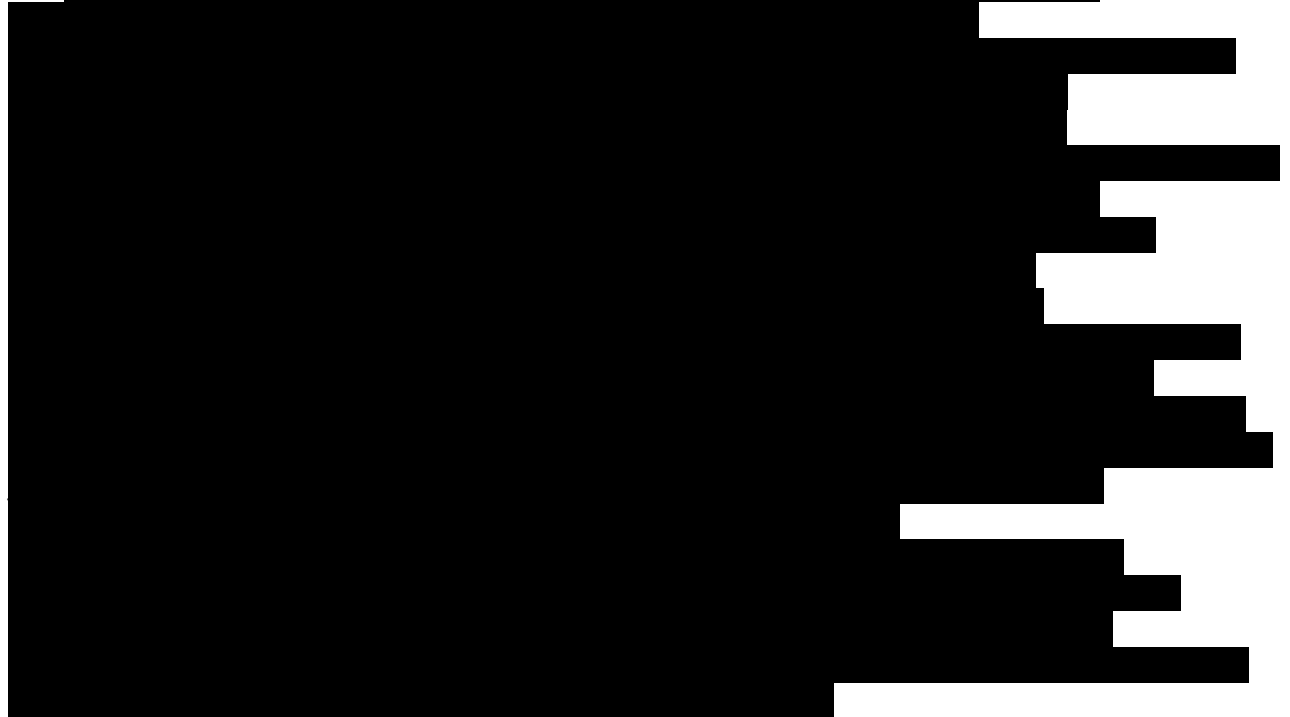
**From:** Johmandie Pienaar

**Sent:** Friday, 16 August 2024 16:05

**To:** Pieter Swart <pieter.swart@dmre.gov.za>; Pumla Mntuyedwa <Pumla.Mntuyedwa@dmre.gov.za>; Willry Van Breda <Willry.VanBreda@dmre.gov.za>; Rhett Smart <rsmart@capenature.co.za>; Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>; Thea Jordan <Thea.Jordan@westerncape.gov.za>; DEADP-EIAAdmin George <DEADPEIAAdmin.George@westerncape.gov.za>; DEADP.AQM@westerncape.gov.za; Brandon Layman <Brandon.Layman@westerncape.gov.za>; Cor Van der Walt <cor.vanderwalt@westerncape.gov.za>; Lutendo Netshilema <LutendoN@Dalrrd.gov.za>; Rahab Maboja <RahabM@Dalrrd.gov.za>; Makhosi Mthimkhulu <mmthimkhulu@bgcma.co.za>; info@bgcma.co.za; Gert van Rensburg <gprensburg@gmail.com>; Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>; 'Ceoheritage' <ceoheritage@westerncape.gov.za>; shagon@hessequa.gov.za; mm@hessequa.gov.za; collab@hessequa.gov.za; nina@gardenroute.gov.za; admin@gouritz.com; pemohajane@nnr.co.za; queries@drdlr.gov.za; snomdo@pgwc.gov.za; marika.champion@westerncape.gov.za; natiedes@telkomsa.net; Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>; gp.rensburg@gmail.com; Gert van Rensburg <gprensburg@gmail.com>

**Cc:** Siyanda Mabaso <siyanda.mabaso@imerys.com>; Ross Lewis <ross.lewis@imerys.com>; Admin [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Bcc:**



**Subject:** NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

**NOTIFICATION OF AVAILABILITY OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS**

**PROJECT TITLE: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

Dear Stakeholder

You have received this email as a registered interested and affected party, organ of state, and/ or key department for the **PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

This email serves as a written notification of the availability of the ***Pre-Application Draft Basic Assessment Report*** for **30-day commenting period (excluding public holidays)**.

**(1) AVAILABILITY OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT:**

The Pre-application Draft Basic Assessment Report and appendices are accessible via: -

(i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (***available for download for the entire commenting period***). Please scroll down the public participation web page until you find the relevant project title as per the project details provided above.

(ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service ***on request*** or where a postal address is the only means of contact provided.

**(2) COMMENTING PERIOD OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Pre-application Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the ***19 August 2024*** and ending on ***17 September 2024***. Your comments on the Pre-application Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than the **17 September 2024**.

**(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (***contact methods: Calls, sms or whatsapp***)

**Fax:** 086 435 4691

**CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Pre-application Draft Basic Assessment Report on this day ***16 August 2024***. As such all RI&APs and Stakeholders are considered to be “in possession” of the Pre-application Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in ***Appendix C of the Final Basic Assessment Report to be submitted to the Department***.

**SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):**

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

**PUBLIC OPEN DAY MEETING NOTICE  
BENTONITE AND ZEOLITE MINING  
AND PROSPECTING ACTIVITIES AS  
PROPOSED WITHIN THE HEIDELBERG  
AND RIVERSDALE AREAS**

**DATE AND TIME:** 10 September 2024 from 10:30am – 8:00pm

**PLACE:** Riversdale Civic Centre, 50 Van Der Berg Street, Riversdale, 6670

**PURPOSE AND OPEN DAY MEETING STRUCTURE:** The purpose of the open day meeting is to provide the opportunity to the public to discuss and ask questions and get firsthand information about current bentonite and zeolite prospecting and mining activities proposed within the Heidelberg and Riversdale areas. The independent

environmental assessment practitioner, Mrs Johmandie Pienaar from Enviro-EAP who has been appointed to conduct the environmental impact assessment processes for the proposed bentonite and zeolite prospecting and mining activities will be available at the venue from 10:30am – 8:00pm to discuss the proposals with the public. Representatives from the applicant company Imerys Refractory Minerals SA (trading as Cape Bentonite Mine) will be present at the venue from 5:00pm – 8:00pm. A presentation on the current applications will be given by Mrs. Pienaar from 6:00pm – 7:00pm and time for additional questions provided from 7:00pm – 8:00pm.

**ENQUIRIES:** Johmandie Pienaar  
PO Box 205, Agulhas, 7287  
Cell: 072 240 3092  
Fax: 086 435 4691  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Kind regards/Vriendelike groete

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)  
Cell: 072 240 3092  
Fax: 086 435 4691  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)  
Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287

**From:** Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>  
**Sent:** Monday, 23 September 2024 09:15  
**To:** [REDACTED] Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>  
**Cc:** [REDACTED] Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>  
**Subject:** RE: Register as I&AP

Good day Mr. [REDACTED]

I hereby confirm your registration as interested and affected party for the applications as listed below.

The applications/reports below are currently available on our website for download, note the cutoff dates for current commenting periods as listed per application below:

- AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDAL - WESTERN CAPE DMR REF: WC30/5/1/2/2/10179MR – **30 DAY COMMENTING CUTOFF PERIOD ENDS 3 OCTOBER 2024**
- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE DMR REF: WC30/5/1/2/2/10180MR – **30 DAY COMMENTING CUTOFF PERIOD ENDS 4 OCTOBER 2024**
- AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582,

RIVERSDALE, WESTERN CAPE – **30 DAY COMMENTING CUTOFF PERIOD ENDED 17 SEPTEMBER 2024\***

- AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE- **30 DAY COMMENTING CUTOFF PERIOD ENDED 16 SEPTEMBER 2024\***
- AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE- **30 DAY COMMENTING CUTOFF PERIOD ENDED 19 SEPTEMBER 2024\***

Electronic downloads of the applications/reports as listed above are available on our website at <https://enviro-eap.co.za/public-participation/> (**available for download for the entire commenting period**). Please scroll down the public participation web page until you find the relevant project title and/or reference number as per the project details provided above.

All comments/questions provided within the commenting periods will be recorded and addressed in the reports as per the legal requirements.

**\*Note that the prospecting right applications as listed above are still in pre-application draft basic assessment phases, hence another 30 day commenting period will be held for these prospecting right applications once the applications are lodged with the DMRE. However, because I was unavailable to reply to your original email as sent on 16 September 2024 to request registration as interested and affected party on the applications above and even though at least one of the 30 days commenting period for the pre-application draft basic assessment report for prospecting right application ended on 16 September 2024 I am providing you with the opportunity to still comment on the three available pre-application draft basic assessment reports for the proposed bentonite and prospecting right applications as listed above until 30 September 2024.**

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**From:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Sent:** Wednesday, 11 September 2024 07:17

**To:** [REDACTED]; Admin <admin@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Subject:** RE: Navraag: Beoogde prospekteer- en mynbou in Hessequa

Good day [REDACTED]

The applications below are currently available on our website for comments, note the cutoff dates for current commenting periods as listed per application below:

- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDAL - WESTERN CAPE DMR REF: WC30/5/1/2/2/10179MR – **COMMENTING CUTOFF PERIOD ENDS 3 OCTOBER 2024**
- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE DMR REF: WC30/5/1/2/2/10180MR - **COMMENTING CUTOFF PERIOD ENDS 4 OCTOBER 2024**
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE - **COMMENTING CUTOFF PERIOD ENDS 17 SEPTEMBER 2024**
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE- **COMMENTING CUTOFF PERIOD ENDS 16 SEPTEMBER 2024**
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE- **COMMENTING CUTOFF PERIOD ENDS 19 SEPTEMBER 2024**

Electronic downloads of the applications as listed above are available on our website at <https://enviro-eap.co.za/public-participation/> (**available for download for the entire commenting period**). Please scroll down the public participation web page until you find the relevant project title and reference number as per the project details provided above.

**All comments/questions provided within the commenting period will be recorded and addressed in the reports as per the legal requirements.**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (*contact methods: Calls, sms or whatsapp*)

**Fax:** 086 435 4691

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**From:** Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>

**Sent:** Tuesday, 05 November 2024 18:08

**To:** [REDACTED]; Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>

**Subject:** RE: Proposed prospecting near Heidelberg

Good day [REDACTED]

I hereby confirm your registration as interested and affected party for the proposed bentonite and zeolite prospecting on Farm De Doorn Rivier 2/300. We (Enviro-EAP) have not distributed any other notices for mining applications in the last month and also none within the Stilbaai and Swellendam areas. I can however register you for the following bentonite and zeolite mining right and prospecting right applications which we are currently conducting and for which interested and affected parties can still register:

- DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE DMR REF: WC30/5/1/2/2/10180MR - **COMMENTING CUTOFF PERIOD ENDS 28 NOVEMBER 2024**
- PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE - **COMMENTING CUTOFF PERIOD ENDED 17 SEPTEMBER 2024 (Another commenting period will be held for the Draft Basic Assessment Report once available)**
- PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE- **COMMENTING CUTOFF PERIOD ENDED 16 SEPTEMBER 2024 (Another commenting period will be held for the Draft Basic Assessment Report once available)**
- PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE- **COMMENTING CUTOFF PERIOD ENDED 19 SEPTEMBER 2024 (Another commenting period will be held for the Draft Basic Assessment Report once available)**

Electronic downloads of the applications as listed above are available on our website at <https://enviro-eap.co.za/public-participation/> (available for download for the entire commenting period). Please scroll down the public participation web page until you find the relevant project title and reference number as per the project details provided above.

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

Responsible EAP: Johmandie Pienaar

Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Direct #: 072 240 3092 (contact methods: Calls, sms or whatsapp)

Fax: 086 435 4691

Please note that in future I will only be able to register you as an interested and affected party if you request to be registered as such for a specific application being advertised at that time.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205  
Agulhas  
7287

Proof



**Enviro-EAP**  
Environmental Consultants



Postal Address	Proof
Department of Agriculture Attention: Mr Cor van der Walt Muldersvlei Road, Elsenburg Building Elsenburg 7606 Tel: 021 808 5099	<b>POSTNET BREDASDORP</b> REG: 1992/006926/23 VAT: 4850195894 SHOP 6A, THE PAVILION CENTRE, 22 SEALY STREET, BREDASDORP, 7280 028 425 1215

DATE: 23 AUGUST 2024

Department of Agriculture  
Private Bag X1  
Elsenburg  
7606  
Att: Cor van der Walt

**NOTIFICATION OF AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE**

**NOTIFICATION OF AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

**NOTIFICATION OF AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250, HEIDELBERG, WESTERN CAPE**

**NAME OF APPLICANT: Imerys Refractory Minerals South Africa: 1/a Cape Bentonite Mine**  
**TEL NO: 028 722 2011**  
**FAX NO: 028 722 2927**  
**POSTAL ADDRESS: Cape Bentonite Mine, Princess Farm, PO Box 242, Heidelberg, Western Province 6665**

Good day,

Enclosed please find a CD copy of the Pre-application Draft Basic Assessment Reports for the above mentioned applications.

You are hereby notified of the 30 day commenting period (starting from the date of this letter and excluding public holidays) within which you must please provide your comments on the abovementioned reports.

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants





P.O.D COPY

QCDJT00002583

Dispatched on:2024-08-23

1 of 1

<b>From:</b> PostNet Bredasdorp <b>Contact:</b> PostNet Bredasdorp Staff <b>Phone:</b> 0284251215			
<b>To:</b> Department of Agriculture Muldersvlai Road Eisenburg Stellenbosch 7600 South Africa  <b>Contact:</b> Mr.Cor van der Wall <b>Phone:</b> 0218085111		<b>Dimensions:</b> 5 cm x 20 cm x 30 cm <b>Mass:</b> 1 kg <b>Service:</b> Express <b>Reference(s):</b> Natalie Hanekom- 0827143276  <b>Special Instructions:</b> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin-left: auto;"><b>EXP</b> Hub:CPT Town:SHC</div>	
<b>Received by Consignee</b> Name: _____ Date: _____ Time: _____	<small>Goods received in full without damage (unless endorsed)</small> <b>Consignee Signature:</b> _____	<b>Shipment ID:</b>  QCDJS00002459	
		<b>Sender Signature:</b> _____	<b>Endorsements:</b> _____

Proof



**Enviro-EAP**  
Environmental Consultants



Courier Address	Proof
Department of Mineral Resources and Energy Attention: Pieter Swart 7 <sup>th</sup> Floor 44 Strand Street Cape Town 8000  Tel: 021 427 1056	<b>POSTNET BREDASDORP</b> REG: 1992/006926/23 VAT: 4850195894 SHOP 6A, THE PAVILION CENTRE, 22 SEALY STREET, BREDASDORP, 7280 028 425 1215

23 August 2024

Department of Mineral Resources and Energy  
Private Bag X09  
Roggebaai  
8001

Att: Pieter Swart

**PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE**

**PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

**PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250, HEIDELBERG, WESTERN CAPE**

**NAME OF APPLICANT:** Imerys Refractory Minerals South Africa: t/a Cape Bentonite Mine  
**TEL NO:** 028 722 2011  
**FAX NO:** 028 722 2927  
**POSTAL ADDRESS:** Cape Bentonite Mine, Princess Farm, PO Box 242, Heidelberg, Western Province 6665

Good day,

Enclosed please find hard copies and electronic CD copies of Pre-application Draft Basic Assessment Reports for the above-mentioned projects.

The commenting period of the Pre-application Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the date of this letter.

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants



R456



**Enviro-EAP**  
Environmental Consultants



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287



**P.O.D COPY**

**QCDJT00002581**

Dispatched on: 2024-08-23

1 of 1

<b>From:</b> PostNet Bredasdorp <b>Contact:</b> PostNet Bredasdorp Staff <b>Phone:</b> 0284251215			
<b>To:</b> Dept. Mineral Resources and Energy 7th Floor 41 Strand Street Cape Town Cape Town 8000 South Africa  <b>Contact:</b> Mr Pieter Swart- The Regional Manager  <b>Phone:</b> 0214271056		<b>Dimensions:</b> 5 cm x 20 cm x 30 cm <b>Mass:</b> 4.25 kg <b>Service:</b> Express <b>Reference(s):</b> Natalie Hanekom- 0827143276  <b>Special Instructions:</b> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin-left: auto;"> <b>EXP</b>          Hub:CPT          Town:CPT       </div>	
<b>Received by Consignee</b> <b>Name:</b> _____ <b>Date:</b> _____ <b>Time:</b> _____		<small>Goods received in full without damage (unless endorsed).</small> <b>Consignee Signature:</b> _____  <b>Shipment ID:</b>  QCDJS00002457	
		<b>Sender Signature:</b> _____ <b>Endorsements:</b> _____	



**Enviro-EAP**  
Environmental Consultants



Proof

Postal Address	Proof
Department of Agriculture, Land Reform and Rural Development Attention: Rahab Ramukhesa Quarantine Station Polkadraai Road Stellenbosch 7599  Tel: 071 777 5592	<b>POSTNET BREDASDORP</b> REG: 1992/006926/23 VAT: 4850195894 SHOP 6A, THE PAVILION CENTRE, 22 SEALY STREET, BREDASDORP 7280 028 425 1215

23 August 2024

Department of Agriculture, Land Reform and Rural Development  
No 17 Strand Street  
Siyaya Building  
Bellville  
7530  
Att: Rahab Ramukhesa

**NOTIFICATION OF AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE**

**NOTIFICATION OF AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/682, RIVERSDALE, WESTERN CAPE**

**NOTIFICATION OF AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250, HEIDELBERG, WESTERN CAPE**

**NAME OF APPLICANT: Imerys Refractory Minerals South Africa: t/a Cape Bentonite Mine  
TEL NO: 028 722 2011  
FAX NO: 028 722 2927  
POSTAL ADDRESS: Cape Bentonite Mine, Princess Farm, PO Box 242, Heidelberg, Western Province 6665**

Good day,

Enclosed please find a CD copy of the Pre-application Draft Basic Assessment Reports for the above-mentioned applications.

You are hereby notified of the 30 day commenting period (starting from the date of this letter and excluding public holidays) within which you must please provide your comments on the abovementioned report.

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



P.O.D COPY

QCDJT00002582

Dispatched on:2024-08-23

1 of 1

**From:** PostNet Bredasdorp  
**Contact:** PostNet Bredasdorp Staff  
**Phone:** 0284251215



**To:** Dept.Of Agriculture, Land Reform and Rural Development  
Quarantine Station  
Polkadraai Road  
Blue Downs  
7580  
South Africa

**Dimensions:** 5 cm x 20 cm x 30 cm  
**Mass:** 1 kg  
**Service:** Express

**Reference(s):**  
Natalie Hanekom-  
0827143276

**Special Instructions:**

**EXP**  
Hub:CPT  
Town:KYT

**Contact:** Rahab Ramukhesa

**Phone:** 0717775592

**Received by Consignee**

**Name:** \_\_\_\_\_

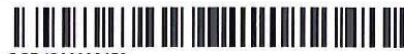
**Date:** \_\_\_\_\_

**Time:** \_\_\_\_\_

Goods received in full without damage (unless endorsed).

**Consignee Signature:**

**Shipment ID:**



QCDJS00002458

**Sender Signature:**

**Endorsements:**

## PROOF OF COMMENTS RECEIVED ON PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT

Registered I&AP 37:

[REDACTED]

**Sent:** Tuesday, 10 September 2024 19:17

**To:** Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Subject:** Navraag: Beoogde prospekteer- en mynbou in Hessequa

Goeienaand, Johmandie

Ek hoop dit gaan goed. Ek wil vra of jy asb. hiermee kan help?

Ek verstaan daar was vandag 'n ope dag oor beoogde bentoniet- en seoliet-prospekteer- en mynaktiwiteite wat binne die gebied van Heidelberg- en Riversdal in Hessequa val.

Ek wil graag iets skryf om lesers in te lig presies waar sake staan en wat beoog word.

\*Mag ek vra watter gebied geraak word of waar presies watter beoogde bedrywighede sal plaasvind (sal dit graag op 'n kaart wil aandui).

Die kaarte wat elke gebied aandui wavoor aansoek gedoen word waarby Enviro-EAP betrokke is is beskikbaar vir aflaai op ons website soos per die link hierbo voorsien.

\*Wat presies behels die beoogde bedrywighede?

Beskrywings van wat beoog word vir elke aansoek is beskikbaar in die verslae vir aflaai op ons website soos per die link hierbo voorsien

\*Daar is boere wat bekommerd is oor watervoorsiening, asook die invloed op grondwater (daar is blykbaar baie ou ondergrondse fonteine naby van die beoogde gebiede)? Gaan of kan daar 'n invloed wees?

Geen water onttrekking sal gedoen word tydens die aktiwiteite soos voorgestel nie, ek verwys U na die inpakstudie verslae soos beskikbaar op ons website vir aflaai soos per die link hierbo voorsien.

\*In watter stadium is die projek tans en watter goedkeurings moet nog verkry word?

Elke omgewingsinpakstudie proses vir die verskeie aansoeke is huidiglik soos per die lys hierbo voorsien. Ons is slegs die omgewingskonsultante wat aangestel is om aansoek te doen namens die aansoeker vir omgewingsgoedkeuring en myn of prospekteringsregte soos per die lys voorsien.

\*Is 'n inpakstudie gedoen, en indien wel, is 'n geoloog en geo-hidroloog betrokke, spesifiek wat die ondergrondse waterbronne betref?

Omgewingsinpakstudie prosesse is onderweg soos per die lys voorsien, laai asb die verslae af op ons website om te bepaal wat tot op hede gedoen is vir elke aansoek.

\*Indien dit reeds gedoen is, is hul volle studiemateriaal beskikbaar, indien nog nie, sal dit beskikbaar gestel word?

Omgewingsinpakstudie prosesse is onderweg soos per die lys voorsien, laai asb die verslae af op ons website om te bepaal wat tot op hede gedoen is vir elke aansoek.

\*Is die departement van landbou bewus van hierdie beplande aktiwiteit, is daar 'n aansoek vir 'n waterlisensie? Waar gaan die water vandaan kom?

Ja nasionaal en provinsiaal departement van landbou word geken in die omgewingsaansoek prosesse en kry ook geleentheid vir kommentaar lewer tydens die prosesse, Asook waterwese word geken. Enigste water wat gebruik word is water vir dust management en dit is munisipale water wat gebruik word waarvoor die aansoeker/mine company self voor betaal. Hierdie inligting is in verslae beskikbaar vir aflaai op die link soos voorsien.

\*Weet die departement van omgewingsake hiervan, die Goukou-rivier is immers sowat 1,5 km van die beoogde mynsterrein?



All comments/questions provided within the commenting period will be recorded and addressed in the reports as per the legal requirements.

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (*contact methods: Calls, sms or whatsapp*)

**Fax:** 086 435 4691

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**Registered I&AP 35:**

[Redacted]

**Sent:** Monday, 16 September 2024 20:15

**To:** Admin <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>; Johmandie Pienaar <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>; Nicolaas Hanekom <[nicolaas@enviro-eap.co.za](mailto:nicolaas@enviro-eap.co.za)>

**Cc:** [Redacted] >

**Subject:** Register as I&AP

Dear Johmandie, I trust you are well.

I kindly refer to the attached notice.

Could you kindly register us as I&AP's for both the prospecting and Mining applications.

Can we also kindly request the following:

- Application form's
- Draft Scoping/Draft EIR's
- Regulation 2.2 Map/s
- Mining Work Programme/Prospecting Work Programme

Your assistance in this regard will be highly appreciated

Kind regards

**Registered I&AP 29:**

[REDACTED]  
**Sent:** Tuesday, 17 September 2024 16:31

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>  
[REDACTED]

**Subject:** RE: COMMENT ON: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

Hi Johmandie,

RE: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

Please find attached comments pertaining to the above matter.

Please could you confirm receipt thereof.

Kind regards,

[REDACTED]

To: Johmandie Pienaar (Enviro-EAP)

**COMMENTS ON: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE**

For the reasons listed below, we OBJECT to the proposed listed activities associated with Bentonite and Zeolite prospecting and mining activities on the farm WEGWYZWERS RIVIER RE/582, Riversdale, Western Cape

**1. PROXIMITY TO A WETLAND AND NEGATIVE IMPACT ON PROTECTED AREAS, VEGETATIONS AND WETLANDS**

- The site's close proximity to a FEPA Wetland with a Very High sensitivity for aquatic biodiversity/CBA1 classification and contamination and disturbance risk posed by the activities due to the proposed site's proximity to the Kruisrivier that feeds directly into the Wetland, raises concern.
- The prospecting/mining activity might occur outside the wetland proper but is within its catchment area and mining would have the potential impact of erosion, alteration of the beds, groundwater pollution, water contamination and increased risks of sediment load in water sources, disruption of ancient aquifers, surface water resources pollution, transformation and degradation.
- It can also decrease the amount of water reaching the wetland or affect water quality.

**2. RISK POSED BY INCREASED TRAFFIC**

- The impact of increased traffic from heavy mining vehicles and mining equipment will extend beyond the mining site and will include the risks and impacts when mining vehicles use the Kruisriver road when mined bentonite is to be trucked from the site to the Processing Plant at the head offices on Erf 1412, Heidelberg or when mining and/or prospecting equipment is moved to and from the site.
- P122 of the Hessequa 2017-2022 IDP reiterates that Section 24 of the Constitution of the Republic of South Africa, 1996, calls on the State *to secure everyone the right to an environment that is not harmful to health or well-being. An important component of ensuring a healthy environment is an understanding of the impact of human activities on the environment and the health and well-being of those who live in and depend on that environment.*
- The heavy equipment and vehicles to be utilised will have a dire deleterious effect on the welfare of people who live on the road and will pose a huge safety risk to pedestrians who use the road on a daily basis as main access road to and from Riversdale as well as on animals and livelihoods.
- Pedestrians and vehicles share the road and the loss of visibility due to dust levels pose a safety risk to pedestrians and vehicles that often stop to pick up or drop off pedestrians along the road.
- Many dwellings are situated right on the road, not set back at a distance, which means the risks posed to safety and increased dust and noise levels are very direct.

- The adverse health outcomes related to the increased exposure to dust is of concern.
- A school sits directly on the route to the proposed operation site and this will pose a great safety and health risk to the children who walk along this road on a daily basis to and from school as well as the children who wait at the various collection points along this road that is used for transportation to schools in Riversdale.
- Visibility is often poor along the road due to rainy or misty weather or already existing dust levels and during the winter months when children use this road when it is often still dark, increasing risk to their safety when a large number of proposed heavy mining vehicles will use the route.
- This road also passes through a wetland, a sensitive aquatic biodiverse area.
- The mining activities pose an increased risk through mining related traffic to animals and agricultural activities on this road i.e., the risk to high incidence of animal traffic on this road multiple times a day to and from 3 dairies along the road and livestock being moved between pastures.
- Many farms straddle both sides of the road so this road is crucial arterial to agricultural activities and impact will pose huge safety risks and disrupt agricultural activities.
- The presence of so many sensitive receptors along this route is cause for concern.
- The impact and volume of increased mining traffic at the existing mining operations that uses the Vetterivier road for access, also in the Riversdale area, has caused huge dissatisfaction among owners of neighbouring farms in that area. +/- 70 trucks per day on this road have disrupted their daily lives to the extent that their quality of life is impacted.

### **3. IMPACT OF INCREASED DUST LEVELS ON AGRICULTURE AND LIVELIHOODS**

- The continual nature of the mining and hauling operation will create significantly more dust.
- The detrimental effect of increased dust on the health of pastures and crops farmed along the road and exposure to increased airborne dust created by mining traffic to animals will be highly detrimental.
- Dust pollution caused by mining vehicles carries potential long term health impacts for people and animals.
- It is well known that dust has a severe negative effect on crops and trees and dust falling onto plants may physically smother leaves or cause leaf injury, reduce fruit setting and cause general reduction in growth. It can also physically block stomata or cause stomatal damage, prevent pollen germination, cell plasmolysis, negatively impact plant respiration and photosynthetic activity and leads to reduced growth and yield. The close proximity to a Macadamia and Citrus farm as one example will have as it's effect huge damages to agricultural and economic activity in the area.
- The livelihood of families along the road depend on agricultural activities and negative impact on this could cause huge damages to livelihoods and the chemical and physical effect of dust on soil can reduce viability of portions of agricultural lands.

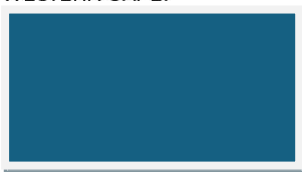
#### 4. RESOURCE AVAILABILITY: WATER SCARCITY

- During a public participation meeting held in Riversdale on Tuesday 10 September 2024, it was represented to the interested parties and public that the Applicant will purchase water from Hessequa municipality at municipal rates for the purpose of the general mining operations as well as to wet the gravel roads to manage dust pollution.
- After extensive inquiries at Hessequa Municipality, there was no evidence of any such application for water use and or consent that water will be supplied to the Applicant.
- The availability of water in a rural area for mining purposes is an integral necessity and as such and if same is not available, the mining operations will be a no starter.
- Hessequa is an area with limited water resources which will become a scarcer commodity as agriculture develops.
- It at this stage seems like this aspect of water availability was misrepresented, and the Applicant is challenged to submit a response to same.

#### 5. IMPACT ON ANIMAL SPECIES:

- The importance of this area is emphasized in the Biodiversity Sector Plan for Hessequa and Mosselbay Municipalities of 2010 and states on Pt 28 of 56 that:
  - *The area between the Langeberg-Outeniqua Mountain Ranges and the coastline is characterized by rows of koppies (hills). The vegetation on these koppies generally consists of fynbos on the southern slopes, Renosterveld on the top and northern slopes, and subtropical thicket along the drainage areas and within those areas secluded from fires... The koppies also provide habitats somewhat different to those of mountainous regions and are therefore important endemic herpetofaunal habitats. Furthermore, they act as stepping stones within the landscape which are frequented by birds such as Victorin's warbler, Protea canary, Orange breasted sunbird, Cape rock jumper and Cape sugarbird, as well as the grysbok (small indigenous antelope species), which requires pristine veld and is sensitive to inappropriate burning and grazing patterns and alien plant infestations.*
- Despite the special biology of these koppies, most of them are under extreme threat and the impact of mining activity will exacerbate this threat as well as pose a great risk to faunal movement.

For the reasons listed above, we OPPOSE the proposed ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE PROSPECTING AND MINING ON FARM WEGWYZERS RIVIER RE/582 RIVERSDAL - WESTERN CAPE.



**Registered I&AP 13:**

**From:** Dennis Nel <dennis.vossie@gmail.com>

**Sent:** Friday, 13 September 2024 11:56

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>  
[REDACTED]

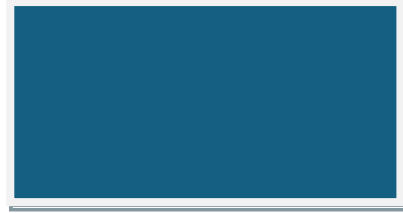
**Subject:** Re: PUBLIC OPEN DAY MEETING HELD FOR BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS

Johmandie,

Please see attached our concerns in the attached file.

Regards  
[REDACTED]

---




To: Johmandie Pienaar (Enviro-EAP)

Comments on Proposed Mining Projects:

**AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING RIGHT ON FARM ZEEKOEKRUIS 651, RIVERSDALE, WESTERN CAPE DMRE REF: WC30/5/1/2/2/10180MR**

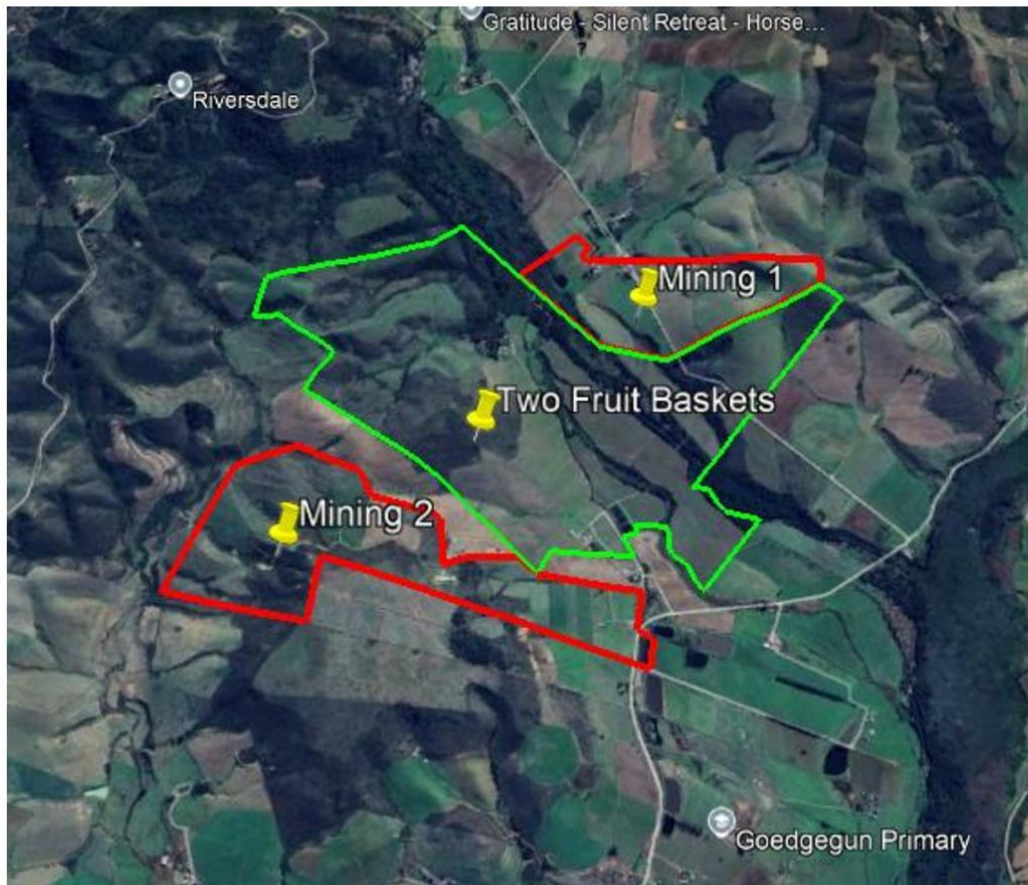
and;

**AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

 acquired the following farms for the purpose of Macadamia and Citrus farming:

1. Portion 7 of the farm Kruisrivier nr.206, in Hessequa Munisipaliteit, Section Riversdale, Province Western-Cape, Size: 94.5601 Ha, conveyanced deed T22063/2017
2. Remainder of Portion 1 of the Farm Wegwyzersrivier nr 114, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 52.1114 Ha. Conveyanced deed T22063/2017
3. Portion 14 of the farm Wegwyzersrivier nr 114, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 41.9433 Ha. Conveyanced deed T22063/2017
4. Remainder of the farm nr. 621, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 157.7460 Ha. Conveyanced deed T22063/2017

The Location of the [redacted] are shown in the following site photo, together with the proposed mining portions (Red):



As can clearly be seen our farm sits directly in-between the proposed mining portions.

As mentioned a total of 106Ha of Macadamia Nuts trees and Citrus trees was planted on the Farms in 2022. The value of the project currently exceeds R60m.

On the public open day meeting held on 10 September 2024, we raised our concerns on the impact on the trees of the proposed mining activities directly adjacent to our farms namely: Dust pollution, noise pollution and increased heavy mining traffic on the already damaged roads ourselves and families use daily.

The most serious and detrimental risk is coupled with the dust pollution that will be created with the mining operations. We will list a few:

1. Plant leaf injury
2. Stomatal damage
3. Premature senescence
4. Plant respiration
5. Decreased photosynthetic activity
6. Disturbance of tree membrane permeability and
7. Reduced growth and yield

The year-round wind conditions in Riversdale furthers our concern as dust particles are more difficult to contain to a specific area.

Without going into excess detail, it is a well-known fact that dust pollution has an considerable negative effect on trees, and thus greatly affects our farming business.

Upon further request multiple case studies can support these concerns.



**Registered I&AP 36:**

[REDACTED]

**Date:** Tuesday, 17 September 2024 at 23:54

**To:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) <[johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)>, [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za) <[admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)>, [gerhard.gerber@westerncape.gov.za](mailto:gerhard.gerber@westerncape.gov.za) <[gerhard.gerber@westerncape.gov.za](mailto:gerhard.gerber@westerncape.gov.za)>, [pieter.swart@dmr.gov.za](mailto:pieter.swart@dmr.gov.za) <[pieter.swart@dmr.gov.za](mailto:pieter.swart@dmr.gov.za)>, [pumla.mntuyedwa@dmr.gov.za](mailto:pumla.mntuyedwa@dmr.gov.za) <[pumla.mntuyedwa@dmr.gov.za](mailto:pumla.mntuyedwa@dmr.gov.za)>, [willry.vanbreda@dmr.gov.za](mailto:willry.vanbreda@dmr.gov.za) <[willry.vanbreda@dmr.gov.za](mailto:willry.vanbreda@dmr.gov.za)>, [REDACTED]

**Subject:** 1st formal Written Objection Against the PA-DBAR for the Prospecting Application on the Farm Wegwyzers Rivier 582, Riversdale, Western Cape

Dear Johmandie

Kindly find attached 1<sup>st</sup> formal written objection against the PA-DBAR compiled for the proposed prospecting activities on the Farm Wegwyzers River 582, Riversdale, Western Cape.

This objection is lodged on behalf of "[REDACTED]" (adjacent land-owner).

Kindly confirm receipt of this objection and do not hesitate to contact writer if you have any queries regarding this document.



**YOUR REF:** Not Available Yet  
**OUR REF:** BD003

**DATE:** 17 SEPTEMBER 2024

**AND TO:** THE EAP:  
ENVIRO-EAP ENVIRONMENTAL CONSULTANTS  
**ATT:** MS. JOHMANDIE PIENAAR  
**EMAIL:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) / [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)  
**CELL:** 072 240 3092

**COPY TO:** HEAD OF DEPARTMENT  
WESTERN CAPE DEPARTMENT OF ENVIRONMENTAL AFFAIRS  
AND DEVELOPMENT PLANNING  
**ATT:** MR. Gerhard Gerber  
**EMAIL:** [gerhard.gerber@westerncape.gov.za](mailto:gerhard.gerber@westerncape.gov.za)

**COPY TO:** DEPARTMENT OF MINERAL RESOURCES  
**ATT:** MR. PIETER SWART/ MR. WILRY VAN BREDA/ MS  
PUMLA MNTUYEDWA  
**EMAIL:** [pieter.swart@dmr.gov.za](mailto:pieter.swart@dmr.gov.za) / [pumla.mntuyedwa@dmr.gov.za](mailto:pumla.mntuyedwa@dmr.gov.za) /  
[willry.vanbreda@dmr.gov.za](mailto:willry.vanbreda@dmr.gov.za)

**OBJECTION AGAINST THE PRE-APPLICATION BASIC ASSESSMENT AND  
PRE-APPLICATION DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME  
REPORT FOR IMERY'S REFRACTORY MINERALS SOUTH AFRICA: CAPE  
BENTONITE MINE PROPOSED BENTONITE AND SEOLITE PROSPECTING  
RIGHT ON THE REMAINDER OF FARM WEGWYZERS RIVIER 582,  
RIVERSDALE, WESTERN CAPE**



## 1. INTRODUCTION

1.1. We refer to the above matter, the email notification by ENVIRO-EAP ENVIRONMENTAL CONSULTANTS to Interested and Affected Parties (“I&APs”) on the 16<sup>th</sup> of August 2024 and confirm that we act herein on behalf of [REDACTED] who is an adjacent land owner to the property known as the **REMAINDER OF WEGWYZERS RIVIER 582, RIVERSDALE, WESTERN CAPE** (“Prospecting Property”). Copies of the aforementioned email correspondence as well as a Map depicting our Client’s Property in relation to the proposed “Prospecting Property” are attached hereto and marked as **Annexures “A”** and **“B1”**. In order to ascertain the cumulative impacts of all current Prospecting Right Applications, we plotted “our Clients” properties in relation to all current Prospecting/ Mining Right Applications as depicted in the Map marked as **Annexure “B2”**.

1.2. Instructions are that [REDACTED] acquired the following farms for the purpose of Macadamia and Citrus farming:

- Portion 7 of the farm Kruisrivier nr. 206, in Hessequa Municipality, Section Riversdale, Province Western-Cape, Size: 94.5601 Ha, conveyanced deed T22063/2017
- Remainder of Portion 1 of the Farm Wegwyzersrivier nr 114, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 52.1114 Ha. Conveyanced deed T22063/2017
- Portion 14 of the farm Wegwyzersrivier nr 114, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 41.9433 Ha. Conveyanced deed T22063/2017
- Remainder of the farm nr. 621, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 157.7460 Ha. Conveyanced deed T22063/2017.

1.3. As noted from page 6 of the Pre-Application Basic Assessment Report (“PA-BAR”), **IMERYS REFRACTORY MINERALS SOUTH AFRICA (PTY) Ltd t/a CAPE BENTONITE MINE** (“the Applicant”) appointed **MS.**

**JOHMANDIE PIENAAR** of **ENVIRO-EAP ENVIRONMENTAL CONSULTANTS** to act as its Environmental Assessment Practitioner (“EAP”) in order to submit an Application for an Environmental Authorisation (“EA”) to the **WESTERN CAPE DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING** (“the Department”) for the prospecting of Bentonite and Zeolite on the “Prospecting Property”. A Windeed Property Search is attached hereto marked as **Annexures “C”**.

- 1.4. We record that we have been instructed by “our Client” to, as we hereby do, object to and/or provide formal comments on the contents of the “Pre-App BAR”, submitted by the Applicant’s EAP.
- 1.5. We furthermore record that we have obtained the following documentation and/or information in respect of the prospecting application from the EAP’s website:
  - 1.5.1. The “Pre-App BAR” dated 15 August 2024;
  - 1.5.2. Appendix A – EAP CV and qualifications;
  - 1.5.3. Appendix B – Maps/ site photos;
  - 1.5.4. Appendix B – Regulation 22 Property Boundary Map;
  - 1.5.5. Appendix C – Proof of Public Participation Process;
  - 1.5.6. Appendix D – Prospecting Work Programme;
  - 1.5.7. Appendix E1 – HWC NID 1;
  - 1.5.8. Appendix E2 – HWC Appendices 1;
  - 1.5.9. Appendix E3 – HWC Record of Decision - 1;
  - 1.5.10. Appendix E4 – Aquatic Impact Compliance Statement - 1;
  - 1.5.11. Appendix E5 – Animal Impact Compliance Statement;
  - 1.5.12. Appendix E6 – Terrestrial Plant Impact Compliance Statement - 1;
  - 1.5.13. Appendix E7 – Terrestrial Biodiversity Impact Compliance Statement - 1;
  - 1.5.14. Appendix F – Prospecting Closure Rehabilitation Plan - 1;
  - 1.5.15. Appendix G1 – Best Practice Guideline Stormwater Management 2006;

1.5.16. Appendix G2 – DEA Screening Report and SSVR;

1.5.17. Appendix G3 – Financial Technical Competence Report.

## 2. DETAIL OF THE OBJECTION

- 2.1. Take note that this objection is regarded as the 1<sup>st</sup> formal written objection against the proposed prospecting activity on the Farm Wegwyzers River Re/582. This objection relates to the Pre-Application Draft Basic Assessment Report (PA-DBAR). The project EAP confirmed during a telephonic discussion that a DBAR will be made available for a 2<sup>nd</sup> round of comment to I&APs when submitting the DBAR to the competent authority and commenting authorities for consideration. Please notify [REDACTED] as well as “our Client” as soon as the application has been submitted and as soon as the DBAR is ready for public comment.
- 2.2. The PA-DBAR contained no comments from the competent or commenting authorities. Please provide [REDACTED] as well as “our Client” with comments received from the various authorities. The comments and Response report to be attached as part of the DBAR must address the comments raised by [REDACTED] the relevant authorities and other stakeholders.
- 2.3. The DBAR to be made available must also include minutes of the public meeting that was held, an attendance register and a copy of presentations made during the public meeting. If not possible to include such information as part of the DBAR, the EAP can contact [REDACTED] and supply the information directly to [REDACTED].
- 2.4. We furthermore place on record that [REDACTED] as well as “our Client” require copies of the actual prospecting application and water-use license application to be submitted to/ submitted to the relevant authorities for the proposed prospecting activities.
- 2.5. We are aware of the fact that we request information relating to parallel processes, but the “one environmental system” (OeS) and mining application timeframes specifically focus on integrated applications and

the “dovetailing”/ streamlining” of parallel processes [REDACTED] as well as “our Client” require a holistic summary of the processes involved and the application status of each process.

- 2.6. According to [REDACTED] analysis of the environmental characteristics of the study area and its surroundings, the proposed prospecting activities will trigger a Section 21 (c) and (i) water-use license or a General Authorisation (GA) Registration in terms of the National Water Act, 1998. In addition, the potential abstraction of ground water for the drilling of more than 500 boreholes could trigger a Section 21 (a) water-use license application (WULA). Kindly confirm the status of the WULA process and kindly register [REDACTED] as well as “our client” as I&AP in the WULA process and supply details regarding the status of the WULA process. Also confirm the amount of water required for the drilling activities.
- 2.7. “Our Client’s” agricultural production farms are located to the immediate south of the “prospecting property”.
- 2.8. Instructions are that a total of 106ha of Macadamia-Nut-Trees and Citrus Trees were planted on “our Client’s” farms in approximately 2022. The value of the project currently exceeds R 60 million.
- 2.9. During the public open day that was held on 10 September 2024, “our Client” raised its serious concerns regarding the potential negative impacts of prospecting and mining activities on its adjacent farming activities and on the farming activities in the surrounding area. **Refer to Annexure D**
- 2.10. “Our Client” is of the opinion that open cast mining activities are not compatible with the agricultural activities in the area and therefore **prospecting**, which is the first step of a longer term devastating mining activity, **should not even be considered** next to agricultural land which contribute significantly to food security. Mining will be “in competition” with the agricultural activities in the area.

- 2.11. Alternative sites for the proposed mining of Bentonite and Zeolite must be considered.
- 2.12. "Our Client" is extremely concerned about the nature of the proposed prospecting activity and the mining activities that are likely to follow, especially if one takes the cumulative impacts associated with another proposed mine to the immediate south of our client's farm into consideration. Imerys Refractory Minerals South Africa is also the applicant for the mine to the south of "our client's" farms (on the Farm Zeekoekruis 651).
- 2.13. The proposed open cast mining facility on the Farm Zeekoekruis will be approximately 45ha in extent and the application is for a mining right. It appears that the prospecting phase is already completed. The mining right application on the Farm Zeekoekruis 651 specifically includes an application for a waste license and "our Client" also intends to object against this application.
- 2.14. The EAP made no mention in the PA-DBAR of the cumulative impacts associated with two potential open cast mines that will eventually **almost surround** "our Client's" agricultural production farms. Enviro-EAP is also the EAP for the Zeekoekruis 651 mining right application to the south of "our Client's" agricultural production farms.
- 2.15. We are of the opinion that the cumulative impacts will have significant detrimental effect on the bio-physical and socio-economic environments. Such detrimental effects will most probably stretch far beyond the boundaries of the two proposed mining sites and "our client's" farms.
- 2.16. According to the provincial and national government environmental data maps the "prospecting property" and its surroundings have high agricultural potential, it incorporates wetland areas, and it incorporates critically endangered ecosystems/ threatened ecosystems.
- 2.17. The EAP states in the PA-DBAR that no prospecting will take place within the 100m and 500m regulated areas. This statement makes no sense at

all, as almost the entire study area is located within the 500m regulated area for wetlands.

- 2.18. The information regarding the geo-hydrology of the site as supplied on Page 74 of the DBAR is regarded as incorrect and insufficient.
- 2.19. Agricultural activities and tourism currently contribute to job creation in the area. Agricultural activities and tourism are longer term activities that create longer term jobs that are mainly available to the local community.
- 2.20. Open cast mining will create shorter term jobs and many of the jobs will be reserved for external employees with special skills. The open cast mines which will surround "our Client's" land will cause permanent damage to soil quality, hydrology, the biodiversity of the area and to the aesthetic environment, including the "sense of Place". As a result, it will lower agricultural and tourism potential.
- 2.21. The need and desirability of the prospecting activities were not sufficiently motivated and the impacts of the prospecting activities on future agricultural and tourism activities in the area were not considered.
- 2.22. The policy and legislative context of the proposed prospecting and mining activity to follow was not sufficiently addressed.
- 2.23. According to the PA-DBAR the prospecting activities will include the drilling of approximately 250 sampler holes and approximately 300 boreholes across the study area. The study area incorporates wetlands and watercourses and the impacts of the large number of holes to be drilled across the property on the sub-surface hydrology and surface hydrology have not been considered. The holes to be drilled will act as "cut off trenches" and could have a significant detrimental impact on the sub-surface water movement, the adjacent wetlands and watercourses and the ecological integrity of the open spaces and ecosystems associated with the watercourses/rivers/ wetlands.
- 2.24. We are of the opinion that the EAP failed to list, assess and address the most significant impacts associated with the proposed prospecting

activities. We are furthermore of the opinion that the EAP failed to include the specialist studies required to assist with a comprehensive impacts assessment.

- 2.25. "Our Client" regarded dust pollution associated with the prospecting activities and potential mining activities to follow as a "fatal flaw" as dust to be generated could have a devastating effect on its agricultural activities. "Our Client" regarded it as necessary to forewarn **Imerys Refractory Minerals South Africa (Pty) Ltd** (the applicant of two potential mines that will almost surround "our Client's" agricultural unit), already at the early prospecting stage, of the potential adverse/ devastating effect of dust on its farming activities i.e. future produce yields and associated facilities and processes.
- 2.26. Such adverse impacts can eventually lead to a significant loss of income and if "our Client's" concerns are ignored **Imerys Refractory Minerals South Africa (Pty) Ltd** could be held liable for "massive loss of income" claims.
- 2.27. The availability of services and storm water management for the prospecting activities were not sufficiently addressed.
- 2.28. At this stage "our client" specifically wishes to highlight and list the following potential areas/aspects where dust pollution could have detrimental impacts on its agricultural products/ crops:
- Plant leaf injury;
  - Stomatal damage;
  - Premature senescence;
  - Plant respiration;
  - Decreased photosynthetic activity;
  - Disturbance of tree membrane permeability; and
  - Reduced growth and yield.
- 1.12 The year-round wind conditions in Riversdale further emphasises "our Client's" concern as dust particles are more difficult to "contain" in a specific area.

- 1.13. Without going into excess detail at this stage, it is a well-known fact that dust pollution has a considerable negative effect on trees, and will thus greatly affect “Our client’s” farming business. Multiple case studies in support of these concerns can be supplied upon further request.

### 3. **CONCLUSION:**

- 3.1. “Our Clients” concerns were not addressed in the PA-DBAR as no specialist studies related to Agricultural Potential nor Air Quality were conducted and included as part of the PA-BAR.
- 3.2. We are of the opinion that potential impacts on the adjacent food producing farms were not considered.
- 3.3. The EAP did not list, assess or address all the potential impacts associated with the bio-physical, socio-economic or institutional environments.
- 3.4. We are, furthermore, of the opinion that the information included in the PA-DBAR is incomplete and did not consider the cumulative impacts of all the surrounding mining/prospecting applications on “our Client’s” farming activities. Two of the proposed mining activities are located immediately adjacent to “our Client’s” farms and almost surrounds “our Client’s” farms.
- 3.5. The lack of sufficient information and assessments also made it impossible to identify all the direct, indirect and cumulative impacts associated with the proposed development. The 2014 NEMA EIA Regulations require that direct, indirect and cumulative impacts be listed, assessed and addressed.
- 3.6. In light of the above, it is suggested that the PA-DBAR be updated to contain reports addressing the concerns raised by “our Client”.

- 3.7. This objection is regarded as the 1<sup>st</sup> formal written objection against the proposed prospecting activity on the Farm Wegwyzers River Re/582. This objection relates to PA-DBAR.
- 3.8. The project EAP confirmed during a telephonic discussion that a DBAR will be made available for a second round of comment for I&APs when submitting the DBAR to the competent authority and commenting authorities for consideration.
- 3.9. Please notify [REDACTED] as well as “our Client” as soon as the application has been submitted and as soon as the DBAR is ready for public comment.
- 3.10. The PA-DBAR contained no comments from the competent or commenting authorities. Please provide Bokamoso as well as “our Client” with comments received from the various authorities. The comments and Response report to be attached as part of the DBAR must address the comments raised by [REDACTED] authorities and other stakeholders.
- 3.11. The DBAR to be made available must also include minutes of the public meeting that was held, an attendance register and a copy of presentations made during the public meeting. If not possible to include such information as part of the DBAR, the EAP can contact [REDACTED] and supply the information directly to [REDACTED].
- 3.12. We are placing on record that [REDACTED] as well as “our Client” require complete copies of the actual prospecting application and water-use license application to be submitted to the relevant authorities for the proposed prospecting activities.

*Please do not hesitate to contact writer if you have any queries regarding this 1<sup>st</sup> formal written objection against the proposed prospecting activities on the Farm Wegwyzers Rivier 582, Riversdale, Western Cape.*



**Sent:** Tuesday, 17 September 2024 12:19  
**To:** Adèle Drake (Bokamoso)

**Attachments:** Fw: PUBLIC OPEN DAY MEETING HELD FOR BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS; Fw: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651, RIVERSDALE, WESTERN CAPE; Fw: NOTIFICATION OF PUBLIC OPEN DAY MEETING TO BE HELD FOR BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS; Fw: NOTIFICATION OF COMMENTING PERIOD EXTENSION: DRAFT SCOPING REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE; Fw: Direct Neighbours Notice - PUBLIC PARTICIPATION PROCESS FOR PROPOSED BENTONITE & ZEOLITE PROSPECTING ON FARM WEGWYZERS RIVIER RE/582 NEAR RIVERSDALE, WESTERN CAPE; Fw: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: DRAFT SCOPING REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE

From: Johmandie Pienaar <johmandie@enviro-eap.co.za>

Sent: Friday, August 16, 2024 4:05 PM

To: Pieter Swart <pieter.swart@dmre.gov.za>; Pumla Mntuyedwa <Pumla.Mntuyedwa@dmre.gov.za>; Willry Van Breda <Willry.VanBreda@dmre.gov.za>; Rhett Smart <rsmart@capenature.co.za>; Adri La Meyer <Adri.LaMeyer@westerncape.gov.za>; Thea Jordan <Thea.Jordan@westerncape.gov.za>; DEADP-EIAAdmin George <DEADPEIAAdmin.George@westerncape.gov.za>; DEADP.AQM@westerncape.gov.za <deadp.aqm@westerncape.gov.za>; Brandon Layman <Brandon.Layman@westerncape.gov.za>; Cor Van der Walt <cor.vanderwalt@westerncape.gov.za>; Lutendo Netshilema <LutendoN@Dalrrd.gov.za>; Rahab Maboab <RahabM@Dalrrd.gov.za>; Makhosi Mthimkhulu <mmthimkhulu@bgcma.co.za>; info@bgcma.co.za <info@bgcma.co.za>; Gert van Rensburg <gprensburg@gmail.com>; Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>; 'Ceoheritage' <ceoheritage@westerncape.gov.za>; shagon@hessequa.gov.za <shagon@hessequa.gov.za>; mm@hessequa.gov.za <mm@hessequa.gov.za>; collab@hessequa.gov.za <collab@hessequa.gov.za>; nina@gardenroute.gov.za <nina@gardenroute.gov.za>; admin@gouritz.com <admin@gouritz.com>; pemohajane@nnr.co.za <pemohajane@nnr.co.za>; queries@drdlr.gov.za <queries@drdlr.gov.za>; snomdo@pgwc.gov.za <snomdo@pgwc.gov.za>; marika.champion@westerncape.gov.za <marika.champion@westerncape.gov.za>; natiedes@telkomsa.net <natiedes@telkomsa.net>; Vanessa Stoffels <Vanessa.Stoffels@westerncape.gov.za>; gp.rensburg@gmail.com <gp.rensburg@gmail.com>; Gert van Rensburg <gprensburg@gmail.com>  
Cc: Siyanda Mabaso <siyanda.mabaso@imerys.com>; Ross Lewis <ross.lewis@imerys.com>; Admin <admin@enviro-eap.co.za>  
Subject: NOTIFICATION OF COMMENTING PERIOD COMMENCEMENT: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

NOTIFICATION OF AVAILABILITY OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS  
PROJECT TITLE: PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

Dear Stakeholder

You have received this email as a registered interested and affected party, organ of state, and/ or key department for the PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

This email serves as a written notification of the availability of the Pre-Application Draft Basic Assessment Report for 30-day commenting period (excluding public holidays).

**(1) AVAILABILITY OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT:**

The Pre-application Draft Basic Assessment Report and appendices are accessible via: -

(i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (available for download for the entire commenting period). Please scroll down the public participation web page until you find the relevant project title as per the project details provided above.

(ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service on request or where a postal address is the only means of contact provided.

**(2) COMMENTING PERIOD OF THE PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Pre-application Draft Basic Assessment Report is 30 days (excluding public holidays), starting from the 19 August 2024 and ending on 17 September 2024. Your comments on the Pre-application Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than the 17 September 2024.

**(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

Responsible EAP: Johmandie Pienaar

Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Direct #: 072 240 3092 (contact methods: Calls, sms or whatsapp)

Fax: 086 435 4691

**CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 24O of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Pre-application Draft Basic Assessment Report on this day 16 August 2024. As such all RI&APs and Stakeholders are considered to be “in possession” of the Pre-application Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in Appendix C of the Final Basic Assessment Report to be submitted to the Department.

**SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No. 14 of 2013):**

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

**PUBLIC OPEN DAY MEETING NOTICE BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS**

DATE AND TIME: 10 September 2024 from 10:30am – 8:00pm

PLACE: Riversdale Civic Centre, 50 Van Der Berg Street, Riversdale, 6670

PURPOSE AND OPEN DAY MEETING STRUCTURE: The purpose of the open day meeting is to provide the opportunity to the public to discuss and ask questions and get firsthand information about current bentonite and zeolite prospecting and mining activities proposed within the Heidelberg and Riversdale areas. The independent environmental assessment practitioner, Mrs Johmandie Pienaar from Enviro-EAP who has been

appointed to conduct the environmental impact assessment processes for the proposed bentonite and zeolite prospecting and mining activities will be available at the venue from 10:30am – 8:00pm to discuss the proposals with the public. Representatives from the applicant company Imerys Refractory Minerals SA (trading as Cape Bentonite Mine) will be present at the venue from 5:00pm – 8:00pm. A presentation on the current applications will be given by Mrs. Pienaar from 6:00pm – 7:00pm and time for additional questions provided from 7:00pm – 8:00pm.

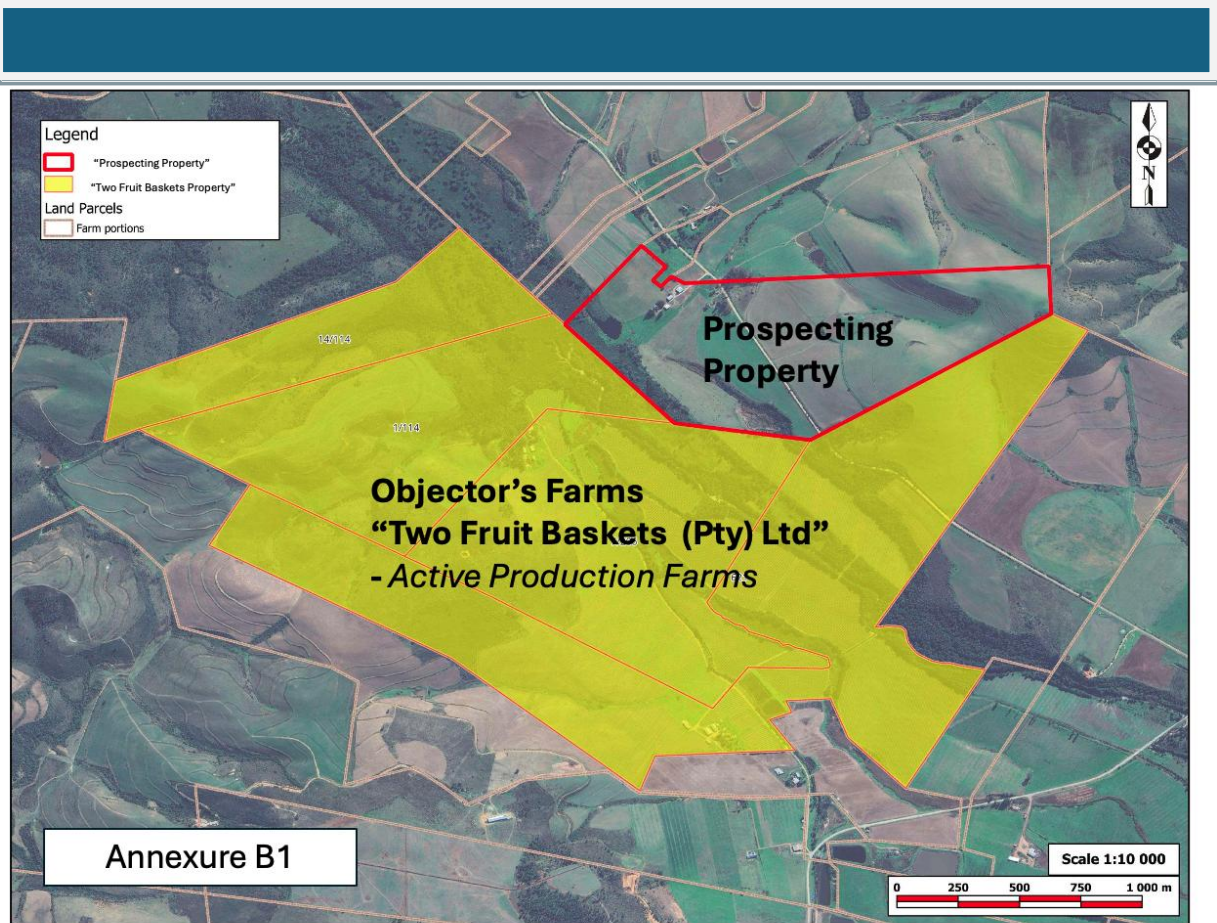
ENQUIRIES: Johmandie Pienaar  
PO Box 205, Agulhas, 7287  
Cell: 072 240 3092  
Fax: 086 435 4691  
Email: admin@enviro-eap.co.za

Kind regards/Vriendelike groete

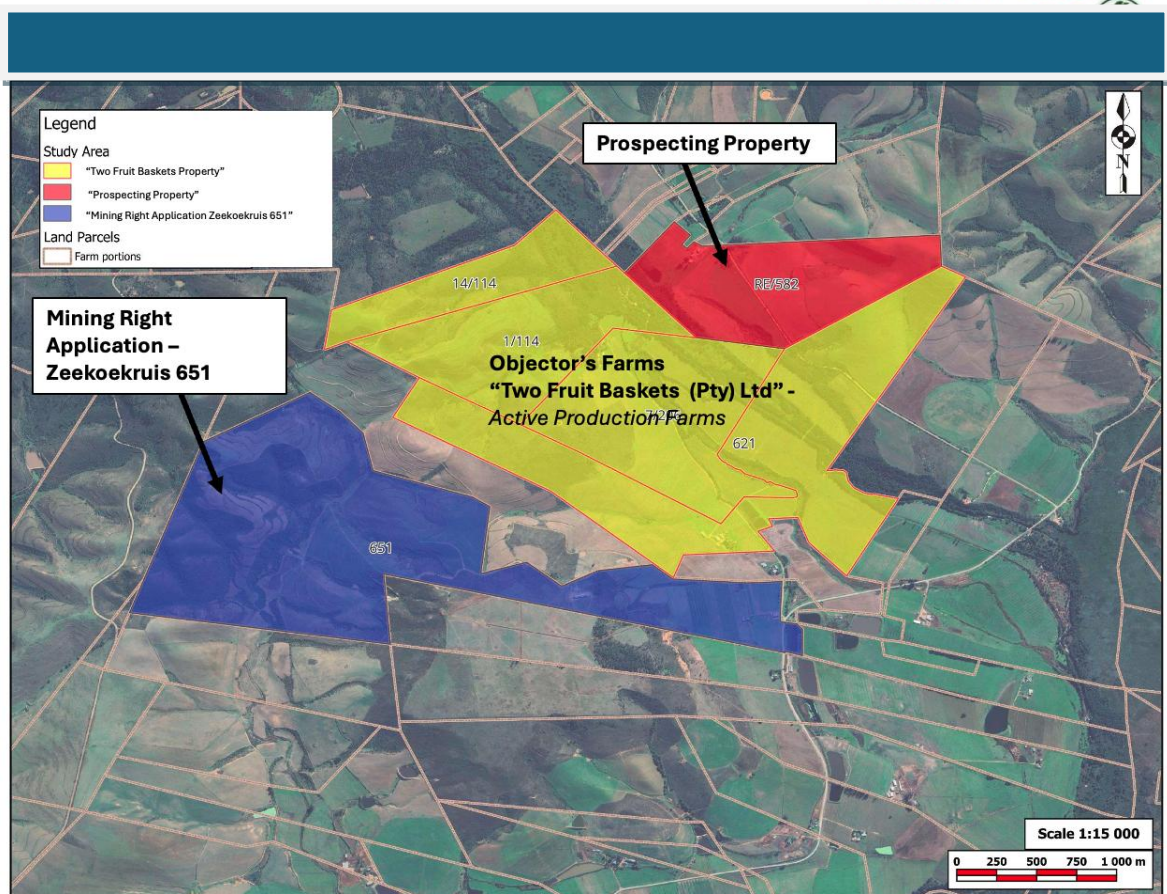
Johmandie Pienaar  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326

Email: johmandie@enviro-eap.co.za  
Cell: 072 240 3092  
Fax: 086 435 4691  
Web: www.enviro-eap.co.za  
Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287

# Annexure B1



# Annexure B2



## WinDeed Database D/O Property

C0640000000058200000

Lexis® WinDeed



Any personal information obtained from this search will only be used as per the Terms and Conditions agreed to and in accordance with applicable data protection laws including the Protection of Personal Information Act, 2013 (POPI), and shall not be used for marketing purposes.

SEARCH CRITERIA			
Search Date	2024/09/17 13:49	LPI Code	C0640000000058200000
Reference	-	Search Source	WinDeed Database
Report Print Date	2024/09/17 13:49		

PROPERTY INFORMATION			
Property Type	FARM	Diagram Deed Number	T13813/1995
Farm Name	FARM WEGWYZERS	Local Authority	LANGEBERG DC
Farm Number	582	Province	WESTERN CAPE
Registration Division	RIVERSDALE RD	Extent	58.1243H
Portion Number	0	LPI Code	C0640000000058200000
Previous Description	-		

OWNER INFORMATION (1)			
VAN RENSBURG TRUST			Owner 1 of 1
Company Type	TRUST	Document	T93603/2005
Registration Number	3412/2000	Microfilm / Scanned Date	-
Name	VAN RENSBURG TRUST	Purchase Price (R)	1 750 000
Multiple Owners	NO	Purchase Date	2004/08/02
Multiple Properties	NO	Registration Date	2005/11/16
Share (%)	-		

ENDORSEMENTS (1)				
#	Document	Institution	Amount (R)	Microfilm / Scanned Date
1	FROM 114/2.206/18	-	-	-

**DISCLAIMER**

This report contains information provided to LNRM by content providers and LNRM cannot control the accuracy of the data nor the timely accessibility. LNRM will not be held liable for any claims based on reliance of the search information provided. This report is subject to the terms and conditions of LexisNexis Risk Management Agreement. LexisNexis Risk Management (Pty) Ltd is a registered credit bureau (NCRCB26).

HISTORIC DOCUMENTS (8)				
#	Document	Institution	Amount (R)	Microfilm / Scanned Date
1	T91955/1996	WEGWYZERSRIVIER STOETERY PTY LTD	855 000	2006 0464 1951
2	B32974/1999	-	1 500 000	1999 0482 4802
3	B32975/1999	LAND & LANDBOUBANK VAN SUID-AFRIKA	1 000 000	1999 0482 4830
4	B79753/1996	STANDARD BANK	-	1999 0482 4844
5	T13813/1995	SILVA GEORGE & CORNELIA J M/I	CCT	1996 0941 5509
6	B122537/2005	-	1 465 000	20120613 07:57:59
7	B13155/2012	LAND & LANDBOU ONTWIKKELINGSBAN	2 441 000	20211123 11:23:27
8	B13155/2012	LAND & LANDBOU ONTWIKKELINGSBANK VAN SUID AFRIKA	2 441 000	20211123 11:23:27

**DISCLAIMER**

This report contains information provided to LNRM by content providers and LNRM cannot control the accuracy of the data nor the timely accessibility. LNRM will not be held liable for any claims based on reliance of the search information provided. This report is subject to the terms and conditions of LexisNexis Risk Management Agreement. LexisNexis Risk Management (Pty) Ltd is a registered credit bureau (NCRCB26).



## Annexure D – Two Fruit Baskets Comment on Proposed Mining Activities



13 September 2024


To: Johmandie Pienaar (Enviro-EAP)

Comments on Proposed Mining Projects:

[AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING RIGHT ON FARM ZEEKOEKRUIS 651, RIVERSDALE, WESTERN CAPE DMRE REF: WC30/5/1/2/2/10180MR](#)

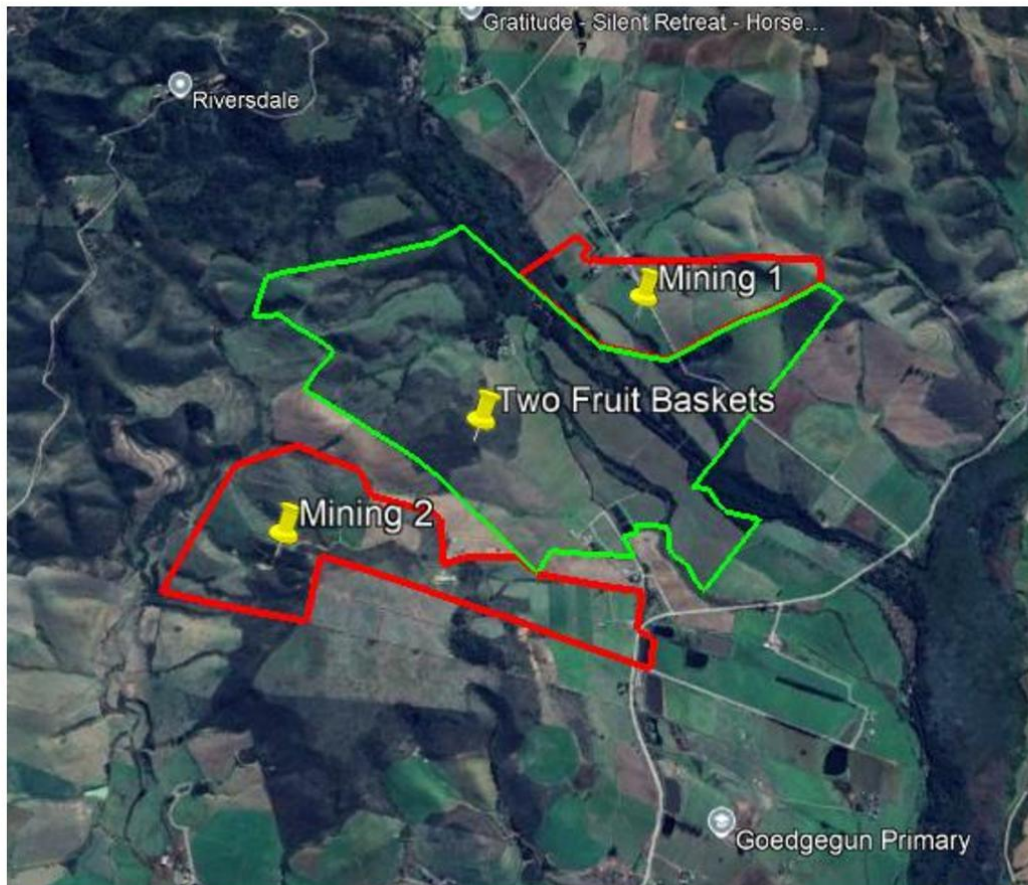
and;

[AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE](#)

 acquired the following farms for the purpose of Macadamia and Citrus farming:

1. Portion 7 of the farm Kruisrivier nr.206, in Hessequa Munisipaliteit, Section Riversdale, Province Western-Cape, Size: 94.5601 Ha, conveyanced deed T22063/2017
2. Remainder of Portion 1 of the Farm Wegwyzersrivier nr 114, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 52.1114 Ha. Conveyanced deed T22063/2017
3. Portion 14 of the farm Wegwyzersrivier nr 114, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 41.9433 Ha. Conveyanced deed T22063/2017
4. Remainder of the farm nr. 621, in Hessequa Municipality, Section Riversdale, Province Western-Cape. Size: 157.7460 Ha. Conveyanced deed T22063/2017

The Location of the [redacted] Farms (Green) are shown in the following site photo, together with the proposed mining portions (Red):



As can clearly be seen our farm sits directly in-between the proposed mining portions.

As mentioned a total of 106Ha of Macadamia Nuts trees and Citrus trees was planted on the Farms in 2022. The value of the project currently exceeds R60m.

On the public open day meeting held on 10 September 2024, we raised our concerns on the impact on the trees of the proposed mining activities directly adjacent to our farms namely: Dust pollution, noise pollution and increased heavy mining traffic on the already damaged roads ourselves and families use daily.

The most serious and detrimental risk is coupled with the dust pollution that will be created with the mining operations. We will list a few:

1. Plant leaf injury
2. Stomatal damage
3. Premature senescence
4. Plant respiration
5. Decreased photosynthetic activity
6. Disturbance of tree membrane permeability and
7. Reduced growth and yield

The year-round wind conditions in Riversdale furthers our concern as dust particles are more difficult to contain to a specific area.

Without going into excess detail, it is a well-known fact that dust pollution has an considerable negative effect on trees, and thus greatly affects our farming business.

Upon further request multiple case studies can support these concerns.



**postal** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**physical** 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Rhett Smart  
**telephone** 087 087 8017  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** LS14/2/6/1/6/5/582\_prospecting\_Riversdale  
**date** 18 September 2024

Enviro-EAP (Pty) Ltd  
P.O. Box 205  
Agulhas  
7287

Attention: Johmandie Pienaar  
By email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Dear Ms Pienaar

**Pre-Application Draft Basic Assessment Report and Environmental Management Programme Report for the Proposed Prospecting for Bentonite and Zeolite on the Remainder of Farm Wegweyzers Rivier 582, Riversdale**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the application.

The application is for prospecting which will include direct push sampler drilling and borehole drilling. The areas proposed for prospecting are mapped as No Natural in the Western Cape Biodiversity Spatial Plan (BSP) apart minor encroachment into Ecological Support Area 2 (ESA) and Critical Biodiversity Areas I (CBA) in the central section associated with a mapped drainage line. We wish to note that the BSP has been updated and through a public participation process, but the update is not yet official. In the updated version the CBAs are slightly more extensive for this property.

The property is bordered by the Kruis River in the west with two drainage lines traversing the site including the above-mentioned. The Kruis River is associated with a broad unchannelled valley bottom wetland and the tributary is associated with a channelled valley bottom wetland. The extent of Kruis River wetland is greater in the National Wetland Map than the previous National Freshwater Ecosystem Priority Area (NFEPA) Map.

The natural vegetation remnants are mapped as Cape Lowland Alluvial Vegetation along the Kruis River wetland, Mossel Bay Shale Renosterveld in the western section and Swellendam Silcrete Fynbos over the remainder to the property. Mossel Bay Shale Renosterveld is listed as critically endangered and Cape Lowland Alluvial Vegetation and Swellendam Silcrete Fynbos are listed as endangered.

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

The results from the screening tool indicate a very high sensitivity for terrestrial biodiversity and aquatic biodiversity, high sensitivity for animal species and medium sensitivity for plant species. The site sensitivity verification has revised the sensitivities for each of these themes to low and accordingly compliance statements are undertaken for each theme. The basis is that the terrestrial and aquatic biodiversity habitats are designated as no go areas.

As indicated above, the Kruis River is bordered by a broad unchannelled valley bottom wetland. The proposed prospecting area borders directly on to the wetland. The aquatic biodiversity compliance statement only mentions the aquatic features located within the footprint proposed for prospecting and therefore there is no mention of the Kruis River wetland.

The upper Goukou River catchment contains important palmiet (*Prionium serratum*) wetlands which are also known to accumulate large volumes of peat. The Kruis River Wetland Nature Reserve (also known as Broomvlei) extends from the confluence of the Kruis River and the Goukou River which is a short distance downstream of the site and extend upstream of the Goukou River. The Kruis River Wetland Nature Reserve supports an extensive palmiet peat wetland. The aerial imagery and wetland mapping indicates that the wetland adjacent to the subject property also supports palmiet although it may be degraded in parts. The palmiet peat wetlands of the upper Duivenhoks and Goukou catchments are extremely sensitive to disturbance and once a knickpoint for erosion starts in combination with other factors (e.g. alien invasive species), the result can be severe gully erosion and complete loss of the wetland. Apart from the important function as wetland habitat and a consistent steady supply of good quality water downstream, the palmiet peat wetlands are important carbon sinks. As a result of the above, the upper Goukou catchment wetlands are under consideration for a Global Environment Facility (GEF) project aimed at wetland restoration. There are a number of scientific publications regarding the upper Goukou palmiet peat wetlands which can be accessed for more detail and verification.

When evaluating impacts associated with a proposed development it is essential that the extent of the impact is evaluated which may extend well beyond the development footprint. In this regard, the proposed prospecting activities could have an impact on the adjacent wetlands if there is not a sufficient buffer, particularly considering the high sensitivity of the wetland. Mining activities that may follow after the prospecting could have an exponentially more significant impact than the prospecting. In this regard, we recommend that areas which would be considered as no go areas for mining should also be excluded from the prospecting application.

A buffer zone tool has been developed and should be used to determine an appropriate buffer from the delineated wetland, taking into account both the impacts as a result of the activity and the sensitivity of the receiving environment (Macfarlane & Bredin 2017). This buffer zone tool is considered as standard practice as an appropriate buffer zone differs depending on both the impact and the aquatic feature impacted. We wish to note the legislated buffer from wetlands in terms of the National Water Act of 500 m which would be a good starting point. It would appear that the public road may be an appropriate boundary for any mining or prospecting activities which should only take place east of the road, however the appropriate buffer should be determined by the buffer zone tool.

Prior to determining the buffer zone, it will be necessary to accurately delineate the wetland. As the wetland has not been mentioned in the aquatic biodiversity compliance statement, it has of course not been delineated in accordance with standard methodology. As indicated above, the NWM mapping of the wetland is more extensive than the NFEPA mapping, however both must be ground-truthed. Due to the significant gaps in the information contained within the aquatic biodiversity compliance statement, CapeNature recommends that the study must be subject to peer review.

The impact on groundwater must also be assessed, as prospecting, but more so mining often has a significant impact on groundwater. As the proposed prospecting will take place in proximity to a wetland there is a good probability that the water table will be intercepted. Groundwater/geohydrology is a significant gap in the current screening tool despite that certain activities such as mining can significantly impact groundwater, which then also often ultimately impacts surface water features and ecology. We therefore recommend that a geohydrological impact assessment is undertaken and is used to inform the aquatic biodiversity compliance statement.

As indicated, the natural vegetation remnants most of which are mapped as CBAs have been designated as no go areas and therefore the proposed prospecting activity avoids impacts on terrestrial biodiversity, which is addressed in the terrestrial biodiversity, plant species and animal species compliance statements. We wish to raise concern regarding the drainage line that was diverted. It is noted that the CBA and ESA follows the original course of the drainage line which is the low point in the landscape (thalweg). We recommend that the original course is also a no-go area for prospecting.

We further wish to note that in general a large number of applications have been received for bentonite and zeolite mining in the Heidelberg/Riversdale district and therefore the cumulative impact needs to be considered. We recommend that the application should indicate all other bentonite and zeolite mining and prospecting applications within a 10 km radius of the site, including those which have already been rehabilitated.

In conclusion, CapeNature objects to the prospecting application as currently proposed. The potential impacts on the sensitive Kruis River palmiet peat wetland have not been adequately addressed. The wetland must be delineated according to standard methodology and a buffer zone assigned using the buffer zone tool. The aquatic biodiversity study must be subject to a peer review by an appropriately qualified aquatic ecologist. A geohydrological study should be undertaken to inform the application and the aquatic biodiversity study.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards



Rhett Smart

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Mervyn Burton, Prof Denver Hendricks, Dr Colin Johnson, Mr Paul Slack

For: Manager: Landscape Conservation Intelligence South

cc. Jeanne Gouws, CapeNature  
Carlo Abrahams, Breede Olifants Catchment Management Agency  
Cor van der Walt, Department of Agriculture

References

Macfarlane, D. & Bredin I. 2017. Buffer Zone Guidelines for Wetlands, Rivers and Estuaries Part 2: Practical Guide. Report to the Water Research Commission. WRC Report No. TT 715/2/17. Gezina, Pretoria



agriculture, land reform  
& rural development

Department:  
Agriculture, Land Reform and Rural Development  
REPUBLIC OF SOUTH AFRICA

**Directorate: Land and Soil Management**

Quarantine Station, Polkadraai Road, Stellenbosch, 7599

Tel: 021 809 0284 e-mail: LutendoN@dalrrd.gov.za

Enquiries: Lutendo Netshilema Date: 10/09/2024

**Enviro-EAP (Pty) Ltd**

**2 School Street**

**Agulhas**

**South Africa**

**7287**

Email: [Johmandie@enviro-eap.co.za](mailto:Johmandie@enviro-eap.co.za)

**RE: COMMENTS ON PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT  
and PRE-APPLICATION DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME  
REPORT FOR IMERY'S REFRACTORY MINERALS SOUTH AFRICA: CAPE BENTONITE  
MINE PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM  
WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

Department of Agriculture, Land Reform and Rural Development; Directorate: Land and Soil Management administer and implement the Conservation of Agricultural Resources Act, (CARA) 43 of 1983). The Act is regarded as one of the principal Acts governing the protection of agricultural and other natural resources. The main aim of the Act is to control the utilization of natural agricultural resources to ensure the conservation of soil, water and vegetation, as well as the combating of alien and invasive plants. According to Section 1 of the Act, conservation of natural agricultural resources includes the protection, restoration as well as the reclamation thereof.

Please note the comments only pertain to Conservation of Agricultural Resources act 43 of 1983 in relation to protection of agricultural natural resources and the related impacts and not to the overall desirability of the proposed development. Imerys Refractory Minerals South Africa (Pty) Ltd t/a Cape Bentonite Mine is an existing Bentonite and Zeolite mining company operating on various farms in close proximity to the towns of Heidelberg and Riversdale that fall within the Hessequa Local Municipality and Garden Route District Municipality in the Western Cape Province. Cape Bentonite Mine proposes to apply for a prospecting right to prospect for bentonite and zeolite on the Farm Wegwyzers Rivier RE/582 near the town of Riversdale in the Western Cape.

In order to achieve the objectives, certain control measures may be prescribed which shall be complied with by the land users and which may relate to:

- Compensate the landowner for the temporary loss of agricultural land during prospecting activities. Undertake prospecting activities on agricultural land before the onset of the annual planting season and do not undertake drilling or borehole sampling after the land has been planted for cultivation. Existing agricultural land contour structures must be reinstated immediately (same day) after prospecting activities completion. Undertake prospecting activities only in identified and specifically demarcated areas as proposed on completely transformed and cultivated areas. Implement erosion and storm water runoff management measures as according to EMP requirements to prevent (or if prevention is not possible limit) any erosion from occurring on the prospecting activity areas and surrounds.
- According to Regulation 3, sub-regulation 3 (1) "Except on authority of a written permission by the executive officer, no land user shall cultivate any land if it"
  - (a) has a slope of more than 20 per cent; or
  - (b) has a slope of more than 12 per cent, is situated in an area specified in column 1 of Table 1, consist mainly of soil of a soil form and soil series respectively specified in columns 2 and 3 of the said Table opposite the area concerned and, if applicable, has such physical properties as may be specified in column 4 of the said Table opposite the soil series concerned."

- According to Regulation 4, sub-regulation 1 (a) "Every land user shall by means of as many of the following measures as are necessary in his situation, protect the cultivated land on his farm unit effectively against excessive soil loss as a result of erosion through the action of water":
  - (a) A suitable soil conservation work shall be constructed and thereafter be maintained in order to divert run-off water from other land or to restrict the run-off speed of run-off water."
- According to Regulation 5, sub-regulation 1 (a) (j) "Every land user shall by means of as many of the following measures as are necessary in his situation, protect the cultivated land on his farm unit effectively against excessive soil loss as a result of erosion through the action of wind":
  - (a) The land concerned shall be cultivated in accordance with such method or be laid out in such manner that the surface movement of soil particles through the action of wind is restricted.
  - (j) A suitable soil conservation work shall be constructed and thereafter be maintained in order to restrict the surface movement of soil particles through the action of wind."
- The restoration or reclamation of eroded land; Regulation 13, sub-regulation 1 & 2. (1) "Every land user shall by means of as many of the measures set out in regulations 4,5 and 9 as area necessary in his situation, effectively restore and reclaim the land on his farm unit on which excessive soil loss due to erosion occurs or has occurred".
  - (2) If the executive officer is satisfied that the measures applied by a land user in a particular case in terms of sub-regulation (1) are not sufficient to restore or reclaim land on which excessive soil loss due to erosion occurs or has occurred, he may direct such land user in writing to apply such additional measures as the executive officer may determine."
- The proposed buffer areas to be located within existing cultivated land. According to regulation 7 sub-regulation (1) of the Conservation of Agricultural Resources Act, (Act 43 of 1983) "Subject to the provisions of the Water Act, 1956 (Act 54 of

1956), and subregulation (2) of this regulation, no land user shall utilise the vegetation in a vlei, marsh or water sponge or within the flood area of a water course or within 10 metres horizontally outside flood area in a manner that causes or may cause the deterioration of or damage to the natural agricultural resources.

- According to regulation 7 sub-regulation (3) "Except on authority of a written permission by the executive officer, no land user shall"-
  - drain or cultivate any vlei, marsh or water sponge or a portion thereof on his farm unit;
  - cultivate any land on his farm unit within the flood area of a water course or within 10 metres horizontally outside the flood area of a water course."
- Regulation 14 "If a land user disturbs or denudes any land on his farm unit for purposes other than prospecting or mining activities"; (c) such land user shall by means of as many of the following measures as are necessary in his situation, effectively restore and reclaim that disturbed or denuded land. (iv) The flow pattern of run-off water, the topography and the slope shall, depending on the volume of material exploited or removed, be restored as closely as possible to the original condition. (v) Suitable vegetation shall be established on the land concerned in order to expedite the restoration and reclamation thereof. (vii) A suitable soil conservation work shall be constructed and thereafter be maintained in order to protect the land concerned against excessive soil loss through the action of water or wind or in order to collect sediment from run-off water.
- Soil disturbance can result in alien vegetation encroachment after rehabilitation , such plants need to be controlled and removed annually (on-going alien vegetation control must keep the area free of alien vegetation after mining) as they can cause damage to the surrounding natural vegetation. According to Conservation of Agricultural Resources Act, (Act 43 of 1983) , Regulation 15E methods of controlling alien plants are as follow:
  - Uprooting; felling; cutting or burning

- Treatment with a weed killer that is registered for use in connection with such plants in accordance with the directions for the use of such
- Biological control carried out in accordance with the stipulations of the Agricultural Pests Act,(Act no 36 of 1983)

Combination of one or more methods mentioned above, and any action taken to control alien plants shall be executed with caution and in a manner that will cause least possible damage to the environment.

The Department encourages the applicant to take responsibility that all above mentioned conditions are compiled and adhered to. However, the department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours sincerely

  
\_\_\_\_\_

pp. EXECUTIVE OFFICER: Act No 43 OF 1983

Director: Land and Soil Management

---

---

**OUR REFERENCE** : 20/9/2/4/8/527  
**YOUR REFERENCE** : -  
**ENQUIRIES** : Cor van der Wall/Fadwa Mohammed

Enviro-EAP Environmental Consultants  
PO Box 205  
AGULHAS  
7287

Att: Johmandie Pienaar

**DRAFT BASIC ASSESSMENT REPORT**  
**PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT: DIVISION RIVERSDALE**  
**REMAINDER OF THE FARM WEGWYZERS RIVIER NO 582**

Your application of 23 August 2024 has reference.

Imerys Refractory Minerals South Africa (Pty) Ltd appointed Enviro-EAP Environmental Services to facilitate the EIA process seeking Environmental Authorisation to prospect for bentonite and zeolite on the Farm Wegwyzers Rivier RE/582 in the Western Cape, Division Riversdale. With reference to Cape Farm Mapper, the farm is 77.17 hectares in extent and cultivated land comprise of Lucern, Planted pastures and Oats.

The WCDOA: LUM has the following comments:

1. From the information provided the Department understands that 250 direct push sampler drill boreholes are proposed where the sampling holes are 60mm in diameter and 6m deep. Following the auger drilling, percussion drilling will commence, comprising of 300 boreholes drilled with the sampling holes that are 0.2m in diameter and 30m deep. Overburden material to be replaced immediately after sample has been taken for both types of drilling and the total amount of boreholes drilled in both drilling types could possibly increase or decrease.
2. Please confirm the total area to be occupied during the prospecting activities by machinery and so forth.

3. From an agricultural perspective, the method of prospecting may have a negative impact on the farming operation as the drilling points are not pinpointed and is dependent on what is discovered once the drilling commences. To protect the agricultural land and farmers rights, an agreement between the landowner/farmer and the prospecting company must be devised to the satisfaction of the landowner.
4. The landowner must be properly consulted and the concerns thoroughly addressed.
5. Rehabilitation of the disturbed areas must be monitored for success and to the satisfaction of the landowner.
6. Further comment will be provided in the next phase of the application process.

Please note:

- Kindly quote the above-mentioned reference number in any future correspondence in respect of the application.
- The Department reserves the right to revise initial comments and request further information based on the information received.

Yours sincerely



**Mr. CJ van der Walt**

**LANDUSE MANAGER: LANDUSE MANAGEMENT**

**2024-12-05**

<p><u>Copies:</u>          Department of Environmental Affairs &amp; Development Planning          1 Dorp Street          CAPE TOWN          8001</p>	<p>Hessequa Municipality          PO Box 29          RIVERSDAL          6670</p>
<p>Department of Minerals &amp; Resources          Private Bag X9          Roggebay          8012</p>	

**Hessequa Municipality**

**From:** Bertus Hayward <bertus@hessequa.gov.za>

**Sent:** Tuesday, 10 September 2024 14:28

**To:** Shagon Carelse <shagon@hessequa.gov.za>; Admin <admin@enviro-eap.co.za>; Johmandie Pienaar <johmandie@enviro-eap.co.za>; Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Subject:** Zeolite Mining: Riversdale and Heidelberg

Johmandie,

Glo dit gaan goed?

Kan jy my asseblief op hoogte hou van hierdie publieke deelname prosesse?

Shagon,

Ek neem aan jy is bewus van hierdie publieke deelname proses?

**PUBLIC OPEN DAY MEETING  
NOTICE BENTONITE AND  
ZEOLITE MINING AND  
PROSPECTING ACTIVITIES AS  
PROPOSED WITHIN THE  
HEIDELBERG AND RIVERSDALE  
AREAS**

**DATE AND TIME:** 10 September 2024 from 10:30am – 8:00pm

**PLACE:** Riversdale Civic Centre, 50 Van Der Berg Street, Riversdale, 6670

**PURPOSE AND OPEN DAY MEETING STRUCTURE:** The purpose of the open day meeting is to provide the opportunity to the public to discuss and ask questions and get firsthand information about current bentonite and zeolite prospecting and mining activities proposed within the Heidelberg and Riversdale areas. The independent environmental assessment practitioner, Mrs Johmandie Pienaar from Enviro-EAP who has been appointed to conduct the environmental impact assessment processes for the proposed bentonite and zeolite prospecting and mining activities will be available at the venue from 10:30am – 8:00pm to discuss the proposals with the public. Representatives from the applicant company Imerys Refractory Minerals SA (trading as Cape Bentonite Mine) will be present at the venue from 5:00pm – 8:00pm. A presentation on the current applications will be given by Mrs. Pienaar from 6:00pm – 7:00pm and time for additional questions provided from 7:00pm – 8:00pm.

**ENQUIRIES:** Johmandie Pienaar

PO Box 205, Agulhas, 7287

Cell: 072 240 3092

Fax: 086 435 4691

Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Dankie



## Bertus Hayward

Manager: Spatial and Economic Development  
Pr. Pln (A/1053/1998)

### Directorate: Development Planning

☎ +27 (0) 28 713 8065 (direct) / +27 (0) 28 713 8000 (office) / +27 (0) 83 632 7367 (mobile)

✉ bertus@hessequa.gov.za

🌐 hessequa.gov.za / www.explorersgardenroute.co.za

📍 Civic Centre, Van den Berg Street, Riversdale, 6670

**ONLY MUNICIPALITY IN SA TO ACHIEVE FULL BLUE FLAG STATUS FOR ALL SWIMMING BEACHES**

**A DECADE OF CLEAN AUDITS (2013 - 2023) | BEST DESTINATION: SA TOURISM AWARDS 2022**

**A CARING, SERVING AND GROWING HESSEQUA**

**24-HOUR EMERGENCY: 028 713 2222 (FIRE & RESCUE AND ACCIDENTS)**



27 September 2024

Enviro-EAP  
PO Box 205  
Agulhas  
7287

Attention: Johmandie Pienaar

**PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE.**

1. Above mentioned and your request for comments refers.
2. As an Interested and Affected Party the municipality **does not object** to the proposed activity as the assessment report covers the areas of concern, with acceptable mitigation measures.
3. The assessment report states the following:  
*"Although there are sections of the proposed prospecting areas which falls within mapped ESA areas the site investigation and most recent google earth images shows that these areas have long since been part of the annually ploughed and cultivated land and no natural vegetation or drainage line ecosystems remains to justify such mapping."*  
Yet, the systematic biodiversity planning category indicates that there are no natural areas remaining. Despite the current use and cover, the classification remains as ESA.
4. In conclusion the Hessequa Municipality would like to thank you for the opportunity to comment on your proposed application.

Yours Sincerely,

Senior Environmental Officer: Philip Hendricks

**STREEKKANTORE / REGIONAL OFFICES**

ALBERTINIA  
Tel: (028) 713 7858

STILBAAI  
Tel: (028) 713 7831

SLANGRIVIER  
Tel: (028) 713 7892

JONGENSFONTEIN  
Tel: (028) 713 7850

HEIDELBERG  
Tel: (028) 713 8019

GOURITSMOND  
Tel: (028) 713 7855

WITSAND  
Tel: (028) 713 7868

**PROOF OF PUBLIC OPEN DAY MEETING NOTICES SENT AND NOTICE PLACED IN NEWSPAPER**

**From:** Johmandie Pienaar

**Sent:** Monday, 19 August 2024 15:13

**Bcc:** [REDACTED]

**Subject:** NOTIFICATION OF PUBLIC OPEN DAY MEETING TO BE HELD FOR BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS

## **PUBLIC OPEN DAY MEETING NOTICE BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS IN THE WESTERN CAPE**

**DATE AND TIME:** 10 September 2024 from 10:30am – 8:00pm

**PLACE:** Riversdale Civic Centre, 50 Van Der Berg Street, Riversdale, 6670

**PURPOSE AND OPEN DAY MEETING STRUCTURE:** The purpose of the open day meeting is to provide the opportunity to the public to discuss and ask questions and get firsthand information about current bentonite and zeolite prospecting and mining activities proposed within the Heidelberg and Riversdale areas. The independent environmental assessment practitioner, Mrs Johmandie Pienaar from Enviro-EAP who has been appointed to conduct the environmental impact assessment processes for the proposed bentonite and zeolite prospecting and mining activities will be available at the venue from 10:30am – 8:00pm to discuss the proposals with the public. Representatives from the applicant company Imerys Refractory Minerals SA (trading as Cape Bentonite Mine) will be present at the venue from 5:00pm – 8:00pm. A presentation on the current applications will be given by Mrs. Pienaar from 6:00pm – 7:00pm and time for additional questions provided from 7:00pm – 8:00pm.

**Current Ongoing Imerys Refractory Minerals SA (Trading as Cape Bentonite Mine) Zeolite and Bentonite Prospecting or Mining Applications up for Discussion:**

- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDAL - WESTERN CAPE  
DMR REF: WC30/5/1/2/2/10179MR
- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE  
DMR REF: WC30/5/1/2/2/10180MR
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE

**ENQUIRIES:** Johmandie Pienaar  
PO Box 205, Agulhas, 7287  
Cell: 072 240 3092  
Fax: 086 435 4691  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

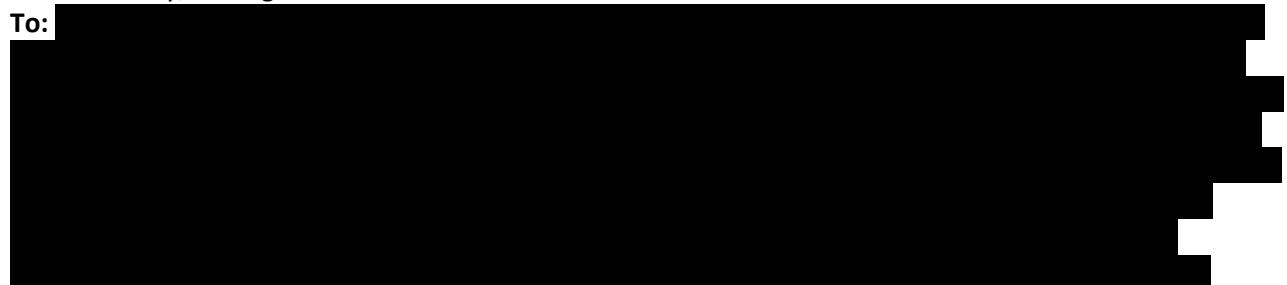
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287

**From:** Johmandie Pienaar

**Sent:** Monday, 19 August 2024 15:05

**To:**



**Subject:** NOTIFICATION OF PUBLIC OPEN DAY MEETING TO BE HELD FOR BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS

## **PUBLIC OPEN DAY MEETING NOTICE BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS IN THE WESTERN CAPE**

**DATE AND TIME:** 10 September 2024 from 10:30am – 8:00pm

**PLACE:** Riversdale Civic Centre, 50 Van Der Berg Street, Riversdale, 6670

**PURPOSE AND OPEN DAY MEETING STRUCTURE:** The purpose of the open day meeting is to provide the opportunity to the public to discuss and ask questions and get firsthand information about current bentonite and zeolite prospecting and mining activities proposed within the Heidelberg and Riversdale areas. The independent environmental assessment practitioner, Mrs Johmandie Pienaar from Enviro-EAP who has been appointed to conduct the environmental impact assessment processes for the proposed bentonite and zeolite prospecting and mining activities will be available at the venue from 10:30am – 8:00pm to discuss the proposals with the public. Representatives from the applicant company Imerys Refractory Minerals SA (trading as Cape Bentonite Mine) will be present at the venue from 5:00pm – 8:00pm. A presentation on the current applications will be given by Mrs. Pienaar from 6:00pm – 7:00pm and time for additional questions provided from 7:00pm – 8:00pm.

**Current Ongoing Imerys Refractory Minerals SA (Trading as Cape Bentonite Mine) Zeolite and Bentonite Prospecting or Mining Applications up for Discussion:**

- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDAL - WESTERN CAPE  
DMR REF: WC30/5/1/2/2/10179MR
- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE  
DMR REF: WC30/5/1/2/2/10180MR

- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE

**ENQUIRIES:** Johmandie Pienaar  
PO Box 205, Agulhas, 7287  
Cell: 072 240 3092  
Fax: 086 435 4691  
Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

Kind regards/Vriendelike groete

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)  
Cell: 072 240 3092  
Fax: 086 435 4691  
Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)  
Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287

## PUBLIC OPEN DAY MEETING NOTICE BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS

**DATE AND TIME:** 10 September 2024 from 10:30am – 8:00pm  
**PLACE:** Riversdale Civic Centre, 50 Van Der Berg Street, Riversdale, 6670  
**PURPOSE AND OPEN DAY MEETING STRUCTURE:** The purpose of the open day meeting is to provide the opportunity to the public to discuss and ask questions and get firsthand information about current bentonite and zeolite prospecting and mining activities proposed within the Heidelberg and Riversdale areas. The independent environmental assessment practitioner, Mrs. Johanna de Plancaar from Enviro-EAP who has been appointed to conduct the environmental impact assessment processes for the proposed bentonite and zeolite prospecting and mining activities will be available at the venue from 10:30am – 8:00pm to discuss the proposals with the public. Representatives from the applicant company Imerys Refractory Minerals SA (trading as Cape Bentonite Mine) will be present at the venue from 5:00pm – 8:00pm. A presentation on the current applications will be given by Mrs. Plancaar from 8:00pm – 7:00pm and time for additional questions provided from 7:00pm – 8:00pm.  
**ENQUIRERS:** Johanna de Plancaar  
 PO Box 205, Agulhas, 7287  
 Cell: 072 240 3082  
 Fax: 086 435 4691  
 Email: [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

### IN DIE LANDROSHOF VIR DIE DISTRIK VAN EDEN GEHOU TE HEIDELBERG

AANSOEK NR. 147/2017

In die saak tussen

HESSEQUA MUNISIPALITEIT

APPLIKANT

en

DAVID JACOBUS FARO

RESPONDENT

#### KENNISGEWING VAN VERKOPING

Ingevolge 'n uitspraak in bogenoemde Agbare Hof en 'n Laasbrief vir Eksekusie gedateer 20 NOVEMBER 2023 word ondervermelde eiendom om 11h00 op VRYDAG, 30 AUGUSTUS 2024 op die perseel te ERF 524, HOOGSTRAAT 8, HEIDELBERG IN DIE PROVINSIE VAN DIE WES-KAAP geregtelik verkoop aan die hoogste bieder.

SEKERE : ERF 524, HOOGSTRAAT 8, HEIDELBERG, PROVINSIE VAN DIE WES-KAAP  
 GROOT : 1216m2 (EENDUISEND TWEEHONDERD EN SESTIEN VIERKANTE METER)  
 GEHOU KRAGTENS TRANSPORTAKTE NOMMER T24077/1947

Onderhewig aan die volgende voorwaardes.

#### VOORWAARDES VAN VERKOPING

- Die volledige voorwaardes van verkoop sal voor die verkoping gelees word en sal by die kantore van Hessequa Munisipaliteit, Van Den Bergstraat, Riversdal en ook by die Eiser se Prokureurs, Eloff Prokureurs te Heidelberg weg 9, Riversdal ter insae lê. Die voorwaardes is ook elektronies beskikbaar vanaf Home & Hectare Real Estate met e-pos adres [wille.vanrensburg@homeandhectare.com](mailto:wille.vanrensburg@homeandhectare.com) en telefoon nommer 0287542377 / 0832617641.
- Hierdie is 'n verbeterde erf (huis is egter bouvalig en onbewoonbaar).
- Betaling : Tien persent van die koopprijs asook die Afslaaerskommissie in kontant is betaalbaar by ondertekening op dag van verkoping en die balans tesame met rente teen 10% per jaar bereken op die Applikant se eis vanaf datum van verkoping tot datum van registrasie van die eiendom in naam van die Koper, welke betaling verseker sal word deur 'n goedgekeurde waarborg van 'n Bank of ander aanneembare instansie binne 14 (veertien) dae na datum van verkoping.

Gedateer te Riversdal op 8 Augustus 2024.

#### MELT KLOPPERS & ELOFF ING.

Prokureur vir Applikant  
 Heidelbergweg 9  
 RIVERSDAL, 6670  
 Telefoon : 028 713 1606  
 E-pos : [office@attorneyseloff.co.za](mailto:office@attorneyseloff.co.za)  
 Verw. 11000463198

### IN DIE LANDROSHOF VIR DIE DISTRIK VAN EDEN GEHOU TE HEIDELBERG

AANSOEK NR. 25/2023

In die saak tussen

HESSEQUA MUNISIPALITEIT

APPLIKANT

en

ANTONIE JAARS  
CECILIA JAARS1ste RESPONDENT  
2de RESPONDENT

#### KENNISGEWING VAN VERKOPING

Ingevolge 'n uitspraak in bogenoemde Agbare Hof en 'n Laasbrief vir Eksekusie gedateer 8 APRIL 2024 word ondervermelde eiendom om 11h00 op VRYDAG, 30 AUGUSTUS 2024 op die perseel te ERF 565 BURNSTRAAT 8, HEIDELBERG IN DIE PROVINSIE VAN DIE WES-KAAP geregtelik verkoop aan die hoogste bieder.

SEKERE : ERF 565, BURNSTRAAT 8, HEIDELBERG, PROVINSIE VAN DIE WES-KAAP  
 GROOT : 1224m2 (EENDUISEND TWEEHONDERD EN VIER-EN-TWINTIG VIERKANTE METER)  
 GEHOU KRAGTENS : TRANSPORTAKTE NOMMER T24079/1947

Onderhewig aan die volgende voorwaardes.

#### VOORWAARDES VAN VERKOPING

- Die volledige voorwaardes van verkoop sal voor die verkoping gelees word en sal by die kantore van Hessequa Munisipaliteit, Van Den Bergstraat, Riversdal en ook by die Eiser se Prokureurs, Eloff Prokureurs te Heidelberg weg 9, Riversdal ter insae lê. Die voorwaardes is ook elektronies beskikbaar vanaf Home & Hectare Real Estate met e-pos adres [wille.vanrensburg@homeandhectare.com](mailto:wille.vanrensburg@homeandhectare.com) en telefoon nommer 0287542377 / 0832617641.
- Hierdie is 'n verbeterde erf (huis is egter bouvalig en onbewoonbaar).
- Betaling : Tien persent van die koopprijs asook die Afslaaerskommissie in kontant is betaalbaar by ondertekening op dag van verkoping en die balans tesame met rente teen 10% per jaar bereken op die Applikant se eis vanaf datum van verkoping tot datum van registrasie van die eiendom in naam van die Koper, welke betaling verseker sal word deur 'n goedgekeurde waarborg van 'n Bank of ander aanneembare instansie binne 14 (veertien) dae na datum van verkoping.

Gedateer te Riversdal op 8 Augustus 2024.

#### MELT KLOPPERS & ELOFF ING.

Prokureur vir Applikant  
 Heidelbergweg 9  
 RIVERSDAL, 6670  
 Telefoon : 028 713 1606  
 E-pos : [office@attorneyseloff.co.za](mailto:office@attorneyseloff.co.za)  
 Verw. 11000476451



### HEIDELBERG, WES-KAAP

VEILING - HESSEQUA MUNISIPALITEIT - ERF VIR SAKEDOELEINDES

VEILING: 27 AUGUSTUS 2024 OM 11:00

Besigtig Op uitsyd

Plak: Op die perseel

Erf 2451, Heidelberg, Groot: 899 m<sup>2</sup>. Gelê op Theo Adams Weg, Heidelberg. Die erf moet alleenlik vir sakedoelende gebruik word - besigheid. Die koper is verantwoordelik vir die hersoening van die eiendom na Sakasone en vir die kostes daarvan verbode; asook vir die grondgebruiks aersoekskostes.  
 Die koper is ook verantwoordelik vir die kostes om aan te sluit by siviele en elektriese dienste.  
 Uitstekende erf vir 'n besigheid in 'n besige area!

#### NAVRAE:

Wille van Rensburg - 083 261 7641 / [wille.vanrensburg@homeandhectare.com](mailto:wille.vanrensburg@homeandhectare.com)

**VOORWAARDES:** Elektroniese betaling. \*FICA-dokumente word verskaf vir die registrasieproses. Alle goedere sal met 'n reseinwysse verkoop word. Die registrasie van die Verkoper, Wet 93 van 2008, is beskikbaar op <http://www.gov.za/documents/consumerprotection-act-regulation>

### IN DIE LANDROSHOF VIR DIE DISTRIK VAN EDEN GEHOU TE HEIDELBERG

AANSOEK NR. 59/2023

In die saak tussen

HESSEQUA MUNISIPALITEIT

APPLIKANT

en

PETRUS JOHANNES ESAU

RESPONDENT

#### KENNISGEWING VAN VERKOPING

Ingevolge 'n uitspraak in bogenoemde Agbare Hof en 'n Laasbrief vir Eksekusie gedateer 8 APRIL 2024 word ondervermelde eiendom om 14h00 op DONDERDAG, 29 AUGUSTUS 2024 op die perseel te ERF 3940, KLAASSENLAAN, SLANGRIVIER IN DIE PROVINSIE VAN DIE WES-KAAP geregtelik verkoop aan die hoogste bieder.

SEKERE : ERF 3940, KLAASSENLAAN, SLANGRIVIER, PROVINSIE VAN DIE WES-KAAP  
 GROOT : 1245m2 (EENDUISEND TWEEHONDERD VYF-EN-VEERTIG VIERKANTE METER)  
 GEHOU KRAGTENS : TRANSPORTAKTE NOMMER T59432/1998

Onderhewig aan die volgende voorwaardes.

#### VOORWAARDES VAN VERKOPING

- Die volledige voorwaardes van verkoop sal voor die verkoping gelees word en sal by die kantore van Hessequa Munisipaliteit, Van Den Bergstraat, Riversdal en ook by die Eiser se Prokureurs, Eloff Prokureurs te Heidelberg weg 9, Riversdal ter insae lê. Die voorwaardes is ook elektronies beskikbaar vanaf Home & Hectare Real Estate met e-pos adres [wille.vanrensburg@homeandhectare.com](mailto:wille.vanrensburg@homeandhectare.com) en telefoon nommer 0287542377 / 0832617641.
- Hierdie is 'n verbeterde erf (huis is egter bouvalig en onbewoonbaar).
- Betaling : Tien persent van die koopprijs asook die Afslaaerskommissie in kontant is betaalbaar by ondertekening op dag van verkoping en die balans tesame met rente teen 10% per jaar bereken op die Applikant se eis vanaf datum van verkoping tot datum van registrasie van die eiendom in naam van die Koper, welke betaling verseker sal word deur 'n goedgekeurde waarborg van 'n Bank of ander aanneembare instansie binne 14 (veertien) dae na datum van verkoping.

Gedateer te Riversdal op 8 Augustus 2024.

#### MELT KLOPPERS & ELOFF ING.

Prokureur vir Applikant  
 Heidelbergweg 9  
 RIVERSDAL, 6670  
 Telefoon : 028 713 1606  
 E-pos : [office@attorneyseloff.co.za](mailto:office@attorneyseloff.co.za)  
 Verw. 1100047822

### IN DIE LANDROSHOF VIR DIE DISTRIK VAN EDEN GEHOU TE HEIDELBERG

AANSOEK NR. 143/2021

In die saak tussen

HESSEQUA MUNISIPALITEIT

APPLIKANT

en

FRANKLIN EBEN ESAU (ID 8108255121082)  
CARMEN BENEDETH ESAU (ID 7908011040083)1ste RESPONDENT  
2de RESPONDENT

#### KENNISGEWING VAN VERKOPING

Ingevolge 'n uitspraak in bogenoemde Agbare Hof en 'n Laasbrief vir Eksekusie gedateer 25 APRIL 2024 word ondervermelde eiendom om 11h00 op DONDERDAG, 29 AUGUSTUS 2024 op die perseel te ERF 4038, LANGSTRAAT, SLANGRIVIER IN DIE PROVINSIE VAN DIE WES-KAAP geregtelik verkoop aan die hoogste bieder.

SEKERE : ERF 4038, LANGSTRAAT, SLANGRIVIER, PROVINSIE VAN DIE WES-KAAP  
 GROOT : 600m2 (SESHONDERD VIERKANTE METER)  
 GEHOU KRAGTENS : TRANSPORTAKTE NOMMER T61520/2018

Onderhewig aan die volgende voorwaardes.

#### VOORWAARDES VAN VERKOPING

- Die volledige voorwaardes van verkoop sal voor die verkoping gelees word en sal by die kantore van Hessequa Munisipaliteit, Van Den Bergstraat, Riversdal en ook by die Eiser se Prokureurs, Eloff Prokureurs te Heidelberg weg 9, Riversdal ter insae lê. Die voorwaardes is ook elektronies beskikbaar vanaf Home & Hectare Real Estate met e-pos adres [wille.vanrensburg@homeandhectare.com](mailto:wille.vanrensburg@homeandhectare.com) en telefoon nommer 0287542377 / 0832617641.
- Hierdie is 'n onverbetere erf.
- Betaling : Tien persent van die koopprijs asook die Afslaaerskommissie in kontant is betaalbaar by ondertekening op dag van verkoping en die balans tesame met rente teen 10% per jaar bereken op die Applikant se eis vanaf datum van verkoping tot datum van registrasie van die eiendom in naam van die Koper, welke betaling verseker sal word deur 'n goedgekeurde waarborg van 'n Bank of ander aanneembare instansie binne 14 (veertien) dae na datum van verkoping.

Gedateer te Riversdal op 8 Augustus 2024.

#### MELT KLOPPERS & ELOFF ING.

Prokureur vir Applikant  
 Heidelbergweg 9  
 RIVERSDAL, 6670  
 Telefoon : 028 713 1606  
 E-pos : [office@attorneyseloff.co.za](mailto:office@attorneyseloff.co.za)  
 Verw. 1000478579







These meeting minutes serve as a summary of the Public Meeting containing key issues raised and discussed.

	Notes
1.	<p><b>Welcoming and Introductions</b></p> <p>Mrs J Pienaar (JP) asked in which language the attendees preferred the meeting to be held and Afrikaans was the recommended language and JP continued in Afrikaans. JP introduced herself and referred to the Imerys Refractory Minerals SA representatives to introduce themselves and opened the meeting.</p> <p>She stated that she was an independent environmental assessment practitioner chairing the meeting, contracted by Imerys Refractory Minerals SA.</p>
2.	<p><b>Meeting Conduct and Attendance Register</b></p> <p>JP briefly discussed the purpose of the meeting as follows:</p> <ol style="list-style-type: none"><li>1. Currently there are five environmental authorisation applications available for comments to the public, these applications are in various stages in the application processes as follows:<ul style="list-style-type: none"><li>• DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDAL - WESTERN CAPE DMR REF: WC30/5/1/2/2/10179MR – 30 DAY COMMENTING CUTOFF PERIOD ENDS 3 OCTOBER 2024</li><li>• DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE DMR REF: WC30/5/1/2/2/10180MR – 30 DAY COMMENTING CUTOFF PERIOD ENDS 4 OCTOBER 2024</li><li>• AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE – 30 DAY COMMENTING CUTOFF PERIOD ENDED 17 SEPTEMBER 2024*</li><li>• AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE- 30 DAY COMMENTING CUTOFF PERIOD ENDED 16 SEPTEMBER 2024*</li><li>• AVAILABILITY OF PRE-APPLICATION DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE- 30 DAY COMMENTING CUTOFF PERIOD ENDED 19 SEPTEMBER 2024</li></ul></li><li>2. During the public participation processes as conducted to date for the applications as mentioned above the need for a public participation meeting was identified hence the public participation meeting is held to provide the public and registered interested and affected parties the opportunity to discuss the proposed applications.</li><li>3. All was informed of the attendance register available and requested to complete the attendance register to ensure registration as interested and affected party if not already registered.</li><li>4. All was informed that there were commenting leaflets available should anyone prefer to provide written comments during or after the meeting. All</li></ol>



	comments provided during the relevant commenting phases will also be recorded and addressed in the reports.
3.	<p><b>EIA Processes</b></p> <p>JP explained that there are two types of Environmental Impact Assessment Processes conducted depending on what type of application is being applied for i.e. for a prospecting right a basic assessment process is followed and for the mining right a scoping environmental impact assessment process is followed.</p> <p>Opportunity to register as an interested and affected party is provided in the following manners (30 days are provided for registration from the date of the notice):</p> <ul style="list-style-type: none"><li>• Notice placed in a local newspaper – usually the Suid-Kaap Forum</li><li>• Notice sent to all landowners directly neighbouring the proposed application property/ies.</li><li>• Notice placed on the boundary of the proposed application property/ies</li></ul> <p>During the basic assessment processes conducted for the prospecting rights a 30 day commenting phase opportunity is provided during the pre-application draft basic assessment phase for all registered interested and affected parties then once the environmental authorisation application has been submitted to the DMRE (Department of Mineral Resources and Energy) and if the application is accepted by the DMRE a reference number is issued and thereafter the draft basic assessment report is compiled and distributed for 30 day commenting phase. All comments received within the 30 day commenting phases are recorded and addressed in the reports and the final basic assessment report is submitted to the DMRE for decision making. Once the DMRE has made its decision to either grant or refuse the environmental authorisation and prospecting right all registered interested and affected parties are notified of the decision and provided with an opportunity to appeal the decision. All appeals are submitted directly to the DMRE.</p> <p>During the scoping environmental impact assessment process conducted for a mining right a 30 day commenting opportunity is provided during the pre-application draft scoping phase for all registered interested and affected parties then once the environmental authorisation application has been submitted to the DMRE and if the application is accepted by the DMRE a reference number is issued and thereafter the draft scoping report is compiled and distributed for 30 day commenting phase. Thereafter the comments received is addressed and the Plan of Study for the environmental impact assessment phase is compiled and submitted as part of the final scoping report to the DMRE for acceptance or rejection. Should the final scoping report be accepted by the DMRE the acceptance letter is issued to the applicant and the draft environmental impact assessment report is compiled in line with the plan of study as per the final scoping report. The draft environmental impact assessment report is distributed for 30 day commenting phase. All comments received within the 30 day commenting phases are recorded and addressed in the report and the final environmental impact assessment report is submitted to the DMRE for decision making. Once the DMRE has made its decision to either grant or refuse the environmental authorisation and prospecting right all registered interested and affected parties are notified of the decision and provided with an opportunity to appeal the decision. All appeals are submitted directly to the DMRE.</p>
4.	<p><b>Prospecting Method</b></p> <p>JP and Hendrik Jones (HJ) briefly explained the prospecting method for bentonite and zeolite.</p>



	<p><b>Drilling and Sampling</b> <i>Direct push sampler drilling.</i> The drill rig will push a stainless steel tube of 50-60cm long into the ground, once full it will bring it up and the sample will be taken out. This process will be carried out until bentonite is found or reaching the depth of around 6m. The hole will then immediately be rehabilitated by backfilling and a month later the site is revisited to determine if any the holes re-opened due to decompaction.</p> <p><i>Boreholes and sampling</i> - following the results of the samples collected during the direct push sampler drilling, a qualified drilling contractor will be appointed by the mining company and under the guidance and supervision of the qualified geologist conduct the following drilling activities on the areas as identified by the geologist. Drilling involves using a rotary percussion drilling rig, drilling usually up to 30m maximum bringing samples to the surface in the form of chips. &lt;1kg of sample material is collected by the geologist from each borehole for testing. The drilling samples collected are sent to the laboratory at the cape bentonite mine processing plant near Heidelberg and tested for specific properties to establish the quality of ore as well as determine approximate extension and volume of the available ore body.</p> <p><i>Rehabilitation</i> – immediately (same day) following samples taken during drilling as described above the excavated material will be replaced and existing agricultural land contour structures will be reinstated. The disturbed prospecting areas will be monitored for signs of erosion for at least six months after sampling and erosion rectification and prevention measures will be implemented as and if required.</p>
5.	<p><b>Mining Method</b> JP and HJ briefly explained the mining method for bentonite and zeolite.</p> <p>Mining is conducted by means of excavators, front-end loaders and 16-ton tipper trucks. The mining method comprises of opencast quarrying. The topsoil and the overburden are removed and stockpiled separately along the perimeter of the quarry. As and when the bentonite is being mined, it is trucked to the Processing Plant at the head offices on Erf 1412 (along the road towards Barrydale), Heidelberg.</p> <p>Mining is done in phases as per the proposed mining layout plans and as per requirement of the EMP only once one mined phase has been rehabilitated may mining start at another phase.</p> <p>Rehabilitation takes place on an ongoing basis as mining proceeds. As the quarry advances along strike, the overburden is progressively replaced to backfill the excavation. The backfilled area is then contoured to prevent erosion, which could be caused by rain and surface water flow. Finally the topsoil is then spread over the disturbed surface area to restore the land to its previous state.</p> <p>Expected maximum number of daily trips during active mining from Monday to Saturday between 8:30 – 17:00:</p> <ul style="list-style-type: none"><li>- The 2 x 10m<sup>3</sup> trucks travels from the processing plant to the mining right area in the morning and remain on the mining site from 8:30-17:00 and return to processing plant at 17:00.</li></ul>



	<p>- The 1 x 20m<sup>3</sup> trucks does 4 trips from and to the processing plant in Heidelberg transporting the ore.</p> <p>Expected maximum number of daily trips on a Sunday between 8:30- 17:00:</p> <p>- The 2 x 10m<sup>3</sup> and 1 x 20m<sup>3</sup> each does 1 trip (so 3 trips in total from and to processing plant) transporting ore to the processing plant in Heidelberg. No active mining to take place on Sundays.</p>
6.	<p><b>Compliance Monitoring and Closure</b></p> <p>JP explained that the environmental management programme requirements compiled for the prospecting and mining rights always includes compliance monitoring requirements to be conducted by an independent party during prospecting and mining operational and rehabilitation phases. Once/f prospecting right or mining right is issued the prospecting or mining right holder must appoint a suitably qualified independent environmental assessment practitioner as external environmental control officer to conduct compliance monitoring during the operational and rehabilitation phases. During the active prospecting or mining operational phases three monthly compliance monitoring is conducted by the external environmental control officer, during prospecting or mining rehabilitation/closure phases six monthly compliance monitoring is conducted by the external environmental control officer until prospecting or mining closure certificate is applied for and obtained.</p> <p>Depending on the environmental authorisation requirements as determined by the DMRE either annual or bi-annual environmental compliance audit reports are also compiled by another suitably qualified environmental assessment practitioner (EAP) who may not be the same EAP who conducted the environmental authorisation application process nor the EAP who has been appointed as external environmental control officer. These annual or bi-annual environmental compliance audit reports are also submitted to the DMRE.</p> <p>The prospecting or mining right holder remains financially responsible for monitoring and implementing rehabilitation measures until it has been concluded that successful rehabilitation has been obtained in accordance with the requirements of the prospecting or mine closure/rehabilitation plan objectives and closure certificates have been obtained.</p>
7.	<p><b>Discussion and Questions</b></p> <p>JP opened the floor for <i>discussion, questions and comments</i>:</p> <ul style="list-style-type: none"> <li>• <i>How are the proposed areas determined for prospecting or mining?</i> Answer – The applicant has been conducting bentonite and zeolite prospecting and mining activities in the Hessequa area for more than 50 years and the mine management and mine geologists therefore have a lot of prior experience in determining potential locations for viable deposits based on experience, knowledge of the area and consulting available geological maps and conducting non-invasive geological surveys. When there is uncertainty on whether or not the particular area being considered will contain viable bentonite or zeolite deposits a prospecting right is applied for, sometimes a mining right application is not preceded by a prospecting right application as the geological information available for a particular area and the above surface indicators provides enough evidence of viable resources for mining.</li> </ul>



- *Is the landowner always notified beforehand and/or engaged with before prospecting and/or mining applications are lodged?*  
 Answer – Imerys Refractory Minerals SA management to date has always engaged with the landowners beforehand on all the prospecting and mining right applications that Enviro-EAP has been involved with and all the current applications already have signed landowners' consent.
- *Who owns the rights to the minerals and what is the law in this regard in terms of who may be able to apply for prospecting or mining?*  
 Answer - In terms of the Mineral and Petroleum Resources Development Act (MPRDA) another person/company can be granted a mineral right over ones property, because of the fact that the State is the custodian of all mineral rights in South Africa. The Minister of Mineral Resources has the sole right to grant, refuse, suspend or cancel any mineral rights.
- *What happens if you as the landowners on whose property mining or prospecting is proposed do not want the prospecting or mining to take place on your property?*  
 Answer - Mining companies do not need consent from the landowner, tenant or affected community to get a mining right or a prospecting right. What this means is that a mining company may still be given a right even when the landowner, tenant/ occupier/resident or community do not want the land to be mined. The landowner, tenant or affected community have the right to object to a proposal and the decision making authority (DMRE) takes these objections and the reasons for objection into consideration when making the decision to grant or refuse a right. If the mining company cannot reach an agreement with a landowner or occupier, either the mining company or the landowner or occupier can notify the Regional Manager. The Regional Manager will hear each party's side of the story and decide how to proceed to resolve the dispute. The Regional Manager may decide that the compensation to be paid to the landowner or tenant must be determined by an arbitrator. An arbitrator is an independent person who helps people resolve disputes. The arbitrator will make a decision and both the landowner or occupier and the mining company must obey the decision
- *What will be the impacts on the public roads due to additional mining proposed and what is the expected daily trips to be made?*  
 Answer - Expected maximum number of daily trips during active mining from Monday to Saturday between 8:30 – 17:00:  
 - The 2 x 10m<sup>3</sup> trucks travels from the processing plant to the mining right area in the morning and remain on the mining site from 8:30-17:00 and return to processing plant at 17:00.  
 - The 1 x 20m<sup>3</sup> trucks does 4 trips from and to the processing plant in Heidelberg transporting the ore.  
 Expected maximum number of daily trips on a Sunday between 8:30- 17:00:  
 - The 2 x 10m<sup>3</sup> and 1 x 20m<sup>3</sup> each does 1 trip (so 3 trips in total from and to processing plant) transporting ore to the processing plant in Heidelberg. No active mining to take place on Sundays.  
 Increase in traffic on public roads and associated potential impact in terms of state of the roads and required maintenance has been identified as part of the potential impacts assessed in the assessment reports. Depending on who is responsible for the maintenance of the public roads either the local municipality or provincial road department the requirements of the mine environmental management



program are as follows - In terms of public roads to be used in collaboration and consultation with the local municipality and/or provincial road department the applicant/mining company will also be responsible for upkeep and repair of access roads used during mining activities as and if deemed necessary to an acceptable extent by both parties.

- *Has the current state of the public roads and associated bridges been assessed to determine suitability for use during proposed mining activities?*

Answer - No, the current state of the public roads proposed to be used during mining activities has not been assessed. These roads are however already being used by heavy vehicles on a daily basis. Increase in traffic on public roads and associated potential impact in terms of state of the roads and required maintenance has been identified as part of the potential impacts assessed in the assessment reports. Depending on who is responsible for the maintenance of the public roads either the local municipality or provincial road department the requirements of the mine environmental management program are as follows - In terms of public roads to be used in collaboration and consultation with the local municipality and/or provincial road department the applicant/mining company will also be responsible for upkeep and repair of access roads used during mining activities as and if deemed necessary to an acceptable extent by both parties.

- *Who will be responsible for the upkeep/maintenance of the public roads used during proposed mining activities?*

Answer - Depending on who is responsible for the maintenance of the public roads either the local municipality or provincial road department the requirements of the mine environmental management program are as follows - In terms of public roads to be used in collaboration and consultation with the local municipality and/or provincial road department the applicant/mining company will also be responsible for upkeep and repair of access roads used during mining activities as and if deemed necessary to an acceptable extent by both parties.

- *Will the use of the public roads during the mining activities and potential increase in maintenance required lead to increase in property taxes?*

Answer – Use of public roads during mining activities do not determine property taxes in the area. Municipalities assess rates according to their own valuation processes.

- *How many people work at the mining site at a time?*

Answer – staff arrives by mining vehicles on a daily basis during operations. The maximum number of employees that will be on site will be 6 (1x excavator operator, 1x Dozer operator, 2x mining truck drivers and 1x truck driver transporting ore to the plant and the internal environmental control officer/mine geologist supervising periodically)

- *What will the working hours be, and do they stay overnight?*

Answer – staff arrives by mining vehicles on a daily basis during operations and no staff stays overnight. During the mining operations working hours are daily between 8h00 – 17h00 from Monday to Sunday with no excavations to take place on a Sunday only haulage of materials to processing plant.



- *Dust generated at the mining activities areas and along public roads are expected to have a significant impact on surrounding farming operations i.e. plantations how will this be managed.*  
 Answer – Dust mitigation measures are to be implemented as per the requirements of the mine environmental management program (EMP) i.e. during high velocity wind conditions, the mine operator or his representative is to evaluate the situation and make recommendations as to whether dust suppression measures are adequate, or whether to suspend work until wind speeds drop to an acceptable level; use non-potable water (if available) to dampen bare soil areas if required to mitigate windblown dust etc. Also, in accordance with the EMP requirements a dust monitoring programme must be compiled in accordance with the National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) National Dust Control Regulations, 2013 - subregulation (5) for implementation during mining activities. If the dust monitoring results indicates that dustfall standards as set out in regulation 3 is exceeded a dust management plan must be compiled and submitted to the relevant air quality officer for approval. As according to the regulations this dust management plan must then be implemented within a month of the date of approval received from the air quality officer.
  
- *Have the potential dust impacts been determined on the protea plantation in close proximity to farm Wegwyzers Rivier RE/582 prospecting right proposal?*  
 Answer – Potential dust production has been identified and assessed as a potential impact of proposed prospecting activities. Due to the nature of the proposed prospecting activities the prospecting methods used, and same day rehabilitation are not expected to produce excessive dust. Dust mitigation and monitoring measures are to be implemented as per the requirements of the prospecting environmental management program (EMP)
  
- *Have the potential dust impacts been determined on citrus plantations in close proximity to Farm Wegwyzers Rivier RE/582 prospecting right and Farm Zeekoekruis 651 mining right proposals?*  
 Answer - Potential dust production has been identified and assessed as a potential impact of proposed prospecting and mining activities. Due to the nature of the proposed prospecting activities the prospecting methods used, and same day rehabilitation proposed the prospecting activities are not expected to produce excessive dust. Dust mitigation and monitoring measures for proposed prospecting and mining activities are to be implemented as per the requirements of the prospecting environmental management program (EMP)
  
- *How will dust production be monitored?*  
 Answer - In accordance with the EMP requirements a dust monitoring programme must be compiled in accordance with the National Environmental Management: Air Quality Act, 2004 (Act No 39 of 2004) National Dust Control Regulations, 2013 - subregulation (5) for implementation during prospecting and mining activities. Dust monitoring is done on a monthly basis by a private company. If the dust monitoring results indicates that dustfall standards as set out in regulation 3 is exceeded a dust management plan must be compiled and submitted to the relevant air quality officer for approval. As according to the regulations this dust management plan



must then be implemented within a month of the date of approval received from the air quality officer. To date none of the historical and existing prospecting and mining right activities that has and are being undertaken within Heidelberg and Riversdale areas has shown signs of excessive dust production and current dust mitigation measures as being implemented on these sites have proven successful in managing the dust within and around impacted sites.

- *What if the mining company staff tampers with dust monitoring equipment?*  
Answer – The internal environmental control officer employed by the right holder is responsible for day-to-day compliance monitoring on the active prospecting and mining sites. The right holder has internal disciplinary procedures that will be followed should it be determined that mine/prospecting staff has tampered with dust monitoring equipment.
- *How is noise monitoring done and what is the noise regulations to be adhered to?*  
Answer – As per the EMP requirements during the operational phases noise monitoring is done on a three monthly basis by the external environmental control officer at active mining and prospecting sites. Noise levels is not to exceed the daytime, equivalent continued rating of 45dBA as recommend by SANS 10103:2004. If deemed necessary, the applicant is to appoint a specialist to conduct noise monitoring at the proposed mining site to establish if the noise produced is within regulated requirements.
- *What process must be followed in case of problems/complaints experienced relating to mining activities?*  
Answer – In accordance with the requirements of the EMP a site notice must be placed at the entrance to each active/operational prospecting or mining site. Amongst other information this site notice must indicate a contact number of the mine management/right holder to be contacted in case of an emergency/complaint. Any landowner or public complaints received by the mine management/right holder must be recorded in complaints register and it must also be recorded how complaints were addressed.
- *Are there any benefits to the landowner on who's property the mining activities are to take place?*  
Answer – The landowner is compensated for the temporary loss of cultivation and/or livestock grazing land during mining operations.
- *How is landowner compensation determined?*  
Answer – Landowner compensation is determined depending on size and type i.e. cultivation, grazing etc. of agricultural land to be impacted upon during mining operations and amount of bentonite and zeolite extracted. Compensation discussions and agreements take place between the land owner and mining or prospecting applicant before operations starts.
- *Will the proposed prospecting or mining activities have an impact on property values or lead to job losses?*  
Answer – To date there has been no indication that similar mining activities taking place within the Heidelberg and Riversdal areas has led to any job losses related



to the mining activities. The proposed mining activities will not lead to any permanent loss in farming activities and nor will the temporary impacts of proposed mining on agricultural activities lead to job loss.

- *Where is water obtained from for dust management?*  
Answer – As per current practices municipal water is carted from the processing plant at Heidelberg to the active mining operational area wherever active operations are taking place and dust suppression is needed at that given time. This water is paid for by the mining company as part of their monthly municipal water bill for the processing plant near Heidelberg.
- *What happens with water collected within mining areas?*  
Answer – As per the stormwater management plans compiled for each proposed mining area stormwater channels/berms are created at the mining areas to divert stormwater as far as possible around the quarries and stockpiling areas towards its natural flow. Should any stormwater collect within the quarries this water is left to evaporate or drain naturally into the soil before excavations continue.
- *What impacts does mining activities have on surrounding farm animals and grazing?*  
Answer -To date mining activities have not shown to have any significant negative impacts on surrounding farm animals or grazing capabilities of surrounding lands except for the temporary loss of grazing area associated with the specific areas used for mining activities during its active mining and rehabilitation phases, but for which the landowner is compensated should mining take place on land usually used for livestock grazing.
- *Are the mining areas fenced off during mining operations?*  
Answer – No, the quarries and stockpiling areas are not specifically fenced off but the quarries as proposed are all currently located within farmland with existing farm fencing.
- *In the case of livestock theft experienced on the property or within the area where mining is taking place what will the procedure be? Will the mining company be held liable for livestock theft?*  
Answer – Any suspected livestock theft to be reported at the local SAPS station and to be investigated by SAPS. Criminal liability will be depending on the outcome of the SAPS investigations.
- *The use of the public roads by the mining company during mining operations are expected to create additional traffic and may pose a risk to other road users and local pedestrians. How will this be managed?*  
Answer – All mining vehicle operators to adhere to road safety and traffic laws as per requirements for all road users. As per EMP requirements a speed limit of 60km/hour must be maintained by all haulage vehicles on public gravel roads
- *How will complaints or concerns from the public be handled during the prospecting and/or mining operations? And what is the turnover/processing time for handling of public complaints/concerns?*  
Answer - In accordance with the requirements of the EMP a site notice must be placed at the entrance to each active/operational prospecting or mining site.



Amongst other information this site notice must indicate a contact number of the mine management/right holder to be contacted in case of an emergency/complaint. Any landowner or public complaints received by the mine management/right holder must be recorded in complaints register and it must also be recorded how complaints were addressed. The turnover time for the complaints/concerns received will depend on the reason for complaints i.e. does the reason for the complaint pose an immediate threat or not etc. however should it be found that the mining company was negligent in addressing the complaint/concern they can be held liable for any significant negative impacts that the negligence may have caused.

- *Who will compensate the public/landowners in case prospecting and/or mining activities leads to financial loss?*

Answer – Should it be proven that the financial loss occurred due to prospecting and/or mining activities the applicable prospecting or mining right holder will be held liable.

- *Who will determine compensation owed to the public/landowners in case prospecting and or mining activities lead to financial loss?*

Answer - Independent parties/specialists will need to be appointed to determine liability and cost of financial loss depending on the type of allegations and what situation occurred.

- *Will additional roads and/or train tracks be built or required like what was required due to mining activities within the Saldanha Bay area?*

Answer – No new roads will need to be constructed and mining activities will not make use of or required train transport.

- *Were the potential human health impacts of bentonite during stockpiling and transportation addressed as queried during comments provided on the Draft Scoping Report for proposed mining activities on Farm Zeekoekruis 651?*

Answer – Yes, replies to the queries on potential human health impacts of bentonite stockpiling and transportation have been provided in the Draft Environmental Impact Assessment Report as compiled and available for review and comments for bentonite mining activities proposed for Farm Zeekoekruis 651. In summary bentonite has no determined acute toxic effects. Bentonite clay mined and stockpiled contains 20+ wt% amount of moisture in it, which means it will not be in dust form during the mining and transportation phases. The trucks transporting bentonite material will also be covered. The drying process of bentonite will be conducted at the processing plant in Heidelberg. The Bentonite Material Safety Data Sheet, recent analysis of stockpiles material at mining and processing sites, occupational hygiene report and relevant research reports were also attached to the Draft Environmental Impact Assessment Report for consideration.

Statements made:

- Interested and affected party requested it to be put on record that he does not believe that allowing prospecting or mining on your property as a landowner provides any benefits to the landowner.
- Interested and affected parties at the meeting in general strongly objects to the proposed prospecting and mining activities and it is stated that prospecting and mining activities are not desired in the rural setting and is expected to have a



	<p>significant negative impact on the rural sense of place and will be a nuisance to local residents.</p> <ul style="list-style-type: none"><li>• Interested and affected parties stated that it is expected that the proposed prospecting right application at Farm Wegwyzers Rivier RE/582 and the mining right application at Farm Zeekoekruis 651 will have potential significant negative impacts on nearby plantations due to expected dust production and that these applications are strongly opposed.</li></ul>
8.	<p><b>Meeting Closure</b></p> <p>JP thanked everyone for attending the meeting and reminded everyone to sign the attendance register if they have not yet done so and closed the meeting. Meeting minutes to be compiled and included in the proof of public participation process conducted for the applications as discussed.</p>

**Minutes compiled by Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



**From:** Johmandie Pienaar

**Sent:** Wednesday, 11 September 2024 07:00

**Subject:** PUBLIC OPEN DAY MEETING HELD FOR BENTONITE AND ZEOLITE MINING AND PROSPECTING ACTIVITIES AS PROPOSED WITHIN THE HEIDELBERG AND RIVERSDALE AREAS

Good day

As an interested and affected party whom attended the public open day meeting held on 10 September 2024 for proposed bentonite and zeolite mining and prospecting activities as proposed within the Heidelberg and Riversdale areas please take note of the following. The applications below are currently available on our website for comments, note the cutoff dates for current commenting periods as listed per application below:

- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON REMAINDER OF FARM KRAGGA RE/593 NEAR RIVERSDAL - WESTERN CAPE DMR REF: WC30/5/1/2/2/10179MR – **COMMENTING CUTOFF PERIOD ENDS 3 OCTOBER 2024**
- PROPOSED BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDALE - WESTERN CAPE DMR REF: WC30/5/1/2/2/10180MR - **COMMENTING CUTOFF PERIOD ENDS 4 OCTOBER 2024**
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE - **COMMENTING CUTOFF PERIOD ENDS 17 SEPTEMBER 2024**
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEIDELAND RE/641 HEIDELBERG, WESTERN CAPE- **COMMENTING CUTOFF PERIOD ENDS 16 SEPTEMBER 2024**
- PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON ERF RE/1014, FARM RE/249 AND FARM RE/33/250 HEIDELBERG, WESTERN CAPE- **COMMENTING CUTOFF PERIOD ENDS 19 SEPTEMBER 2024**

Electronic downloads of the applications as listed above are available on our website at <https://enviro-eap.co.za/public-participation/> (**available for download for the entire commenting period**). Please scroll down the public participation web page until you find the relevant project title and reference number as per the project details provided above.

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (*contact methods: Calls, sms or whatsapp*)

**Fax:** 086 435 4691

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**PROOF OF NOTICE/S SENT FOR 30 DAY COMMENTING PERIOD COMMENCED ON THE DRAFT BASIC ASSESSMENT REPORT**

**From:** Johmandie Pienaar

**Sent:** Monday, 01 September 2025 16:19

**To:** Nomfundo Magubane <nomfundo.magubane@dmpr.gov.za>; Pumla Mntuyedwa <pumla.mntuyedwa@dmre.gov.za>; elise.steenkamp@dmre.gov.za; Vusumuzi Mwelase <vusumuzi.mwelase@dmre.gov.za>; Morne Koen <morne.koen@dmre.gov.za>; Linda Njemla <linda.njemla@dmre.gov.za>; Pieter Swart <pieter.swart@dmre.gov.za>; Willry Van Breda <willry.vanbreda@dmre.gov.za>; Rhet Smart <rsmart@capenature.co.za>; Adri La Meyer <adri.lameyer@westerncape.gov.za>; Thea Jordan <thea.jordan@westerncape.gov.za>; Andre Oosthuizen <andre.oosthuizen@westerncape.gov.za>; Brandon Layman <brandon.layman@westerncape.gov.za>; Cor Van der Walt <cor.vanderwalt@westerncape.gov.za>; Lutendo Netshilema <lutendon@dalrrd.gov.za>; rhahabm@dalrrd.gov.za; Rahab Maboja <rahabm@dalrrd.gov.za>; Makhosi Mthimkhulu <mmthimkhulu@bocma.co.za>; Makhosi Mthimkhulu <mmthimkhulu@bgcma.co.za>; info@bgcma.co.za; Shagon Carelse <shagon@hessequa.gov.za>; Albert De Klerk De Klerk <mm@hessequa.gov.za>; collab@hessequa.gov.za; Collab Info <info@hessequa.gov.za>; Bertus Hayward <bertus@hessequa.gov.za>; Phillip Hendricks <phillip@hessequa.gov.za>; nina@gardenroute.gov.za; admin@gouritz.com; pemohajane@nnr.co.za; queries@drdlr.gov.za; 'snomdo@pgwc.gov.za' <snomdo@pgwc.gov.za>; marika.champion@westerncape.gov.za; natiedes@telkomsa.net; raymond.auerbach@mandela.ac.za; Vanessa Stoffels <vanessa.stoffels@westerncape.gov.za>; Anel Abrahams Transnet Freight Rail CPT [anel.abrahams@transnet.net](mailto:anel.abrahams@transnet.net)

**Bcc:**

**Subject:** NOTIFICATION OF 30 DAY COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS  
PROJECT TITLE: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE  
PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE  
DMPR Ref: WC 30/5/1/1/2/10507PR**

Dear Stakeholder

You have received this email as a registered interested and affected party, organ of state, and/ or key department for the ***PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE***

This email serves as a written notification of the availability of the ***Draft Basic Assessment Report*** for **30-day commenting period (excluding public holidays)**.

### **(1) AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT:**

The Draft Basic Assessment Report and appendices are accessible via: -

- (i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (***available for download for the entire commenting period***). Please scroll down the public participation web page until you find the relevant project title as per the project details provided above.
- (ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service ***on request*** or where a postal address is the only means of contact provided.

### **(2) COMMENTING PERIOD OF THE DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the ***2 September 2025*** and ending on ***2 October 2025***. Your comments on the Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than **2 October 2025**.

### **(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (***contact methods: Calls, sms or whatsapp***)

**Fax:** 086 435 4691

### **CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Draft Basic Assessment Report on this day **1 September 2025**. As such all RI&APs and Stakeholders are considered to be “in possession” of the Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in ***Appendix C of the Final Basic Assessment Report to be submitted to the Department***.

### **SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):**

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287

**From:** Johmandie Pienaar

**Sent:** Monday, 01 September 2025 16:25

**To:** Stephanie Barnardt <[stephanie.barnardt@westerncape.gov.za](mailto:stephanie.barnardt@westerncape.gov.za)>; Ceoheritage  
[ceoheritage@westerncape.gov.za](mailto:ceoheritage@westerncape.gov.za)

**Bcc:** 'Fernando Tallie' <[ftallie@wispnet.co.za](mailto:ftallie@wispnet.co.za)>

**Subject:** NOTIFICATION OF 30 DAY COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

*Heritage Western Cape NID Reference HM/ EDEN / HESSEQUA/ RIVERSDALE / FARM WEGWYZERSRIVIER RE/582 Case No HWC24040811SB0409*

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS  
PROJECT TITLE: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE  
PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE  
DMPR Ref: WC 30/5/1/1/2/10507PR**

Dear Stakeholder

You have received this email as a registered interested and affected party, organ of state, and/ or key department for the ***PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE***

This email serves as a written notification of the availability of the ***Draft Basic Assessment Report for 30-day commenting period (excluding public holidays)***.

**(1) AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT:**

The Draft Basic Assessment Report and appendices are accessible via: -

- (i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (***available for download for the entire commenting period***). Please scroll down the public participation web page until you find the relevant project title as per the project details provided above.
- (ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service ***on request*** or where a postal address is the only means of contact provided.

**(2) COMMENTING PERIOD OF THE DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Draft Basic Assessment Report is ***30 days (excluding public holidays)***, starting from the ***2 September 2025*** and ending on ***2 October 2025***. Your comments on the Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than ***2 October 2025***.

**(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (*contact methods: Calls, sms or whatsapp*)

**Fax:** 086 435 4691

### **CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Draft Basic Assessment Report on this day **1 September 2025**. As such all RI&APs and Stakeholders are considered to be "in possession" of the Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in **Appendix C of the Final Basic Assessment Report to be submitted to the Department**.

### **SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):**

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner

EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP

PO Box 205

Agulhas

7287

**From:** Johmandie Pienaar

**Sent:** Monday, 01 September 2025 16:34

**To:** [REDACTED]

**Subject:** NOTIFICATION OF 30 DAY COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT FOR 30 DAYS**  
**PROJECT TITLE: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE**  
**PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**  
**DMPR Ref: WC 30/5/1/1/2/10507PR**

Dear Stakeholder

You have received this email as a registered interested and affected party, organ of state, and/ or key department for the ***PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE***

This email serves as a written notification of the availability of the ***Draft Basic Assessment Report*** for **30-day commenting period (excluding public holidays)**.

*Also for your attention as specifically requested attached a copy of the Environmental Authorisation as was submitted to the Competent Authority*

**(1) AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT:**

The Draft Basic Assessment Report and appendices are accessible via: -

- (i) electronic download on our website at <https://enviro-eap.co.za/public-participation/> (***available for download for the entire commenting period***). Please scroll down the public participation web page until you find the relevant project title as per the project details provided above.
- (ii) hardcopies and/or cd copies will only be sent via SAPO – registered mail service ***on request*** or where a postal address is the only means of contact provided.

**(2) COMMENTING PERIOD OF THE DRAFT BASIC ASSESSMENT REPORT AND DEADLINE FOR COMMENTS SUBMISSION**

The commenting period of the Draft Basic Assessment Report is **30 days (excluding public holidays)**, starting from the **2 September 2025** and ending on **2 October 2025**. Your comments on the Draft Basic Assessment Report must be provided within the regulatory 30-day commenting period or by no later than **2 October 2025**.

**(3) SUBMISSION OF COMMENTS**

Please direct your comments in writing for the attention of the responsible EAP as per the contact information provided below:

**Responsible EAP:** Johmandie Pienaar

**Email:** [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za) or [admin@enviro-eap.co.za](mailto:admin@enviro-eap.co.za)

**Direct #:** 072 240 3092 (***contact methods: Calls, sms or whatsapp***)

**Fax:** 086 435 4691

**CONSULTATION WITH ORGANS OF STATE / KEY DEPARTMENTS [NEMA S240]**

To facilitate adequate consultation with State Departments that administers laws relating to a matter affecting the environment in accordance with the requirements of Section 240 of NEMA, please be advised that all registered interested and affected parties, organs of state, key departments, and/or stakeholders were [in receipt of this email] notified electronically of the availability of the Draft Basic Assessment Report on this day **1 September 2025**. As such all RI&APs and Stakeholders are considered to be “in possession” of the Draft Basic Assessment Report and appendices from the date of electronic notification. A list of RI&APs and Stakeholders consulted, and their respective contact information to be included in ***Appendix C of the Final Basic Assessment Report to be submitted to the Department***.

**SECTIONS 11 AND 18 OF POPI ACT, 2013 (Act No.14 of 2013):**

The personal information and comments provided will be included in reports to be submitted to the Competent Authority to enable informed decision-making. Also, if you choose to register as an I&AP your personal information will be made available to an appellant in the case of an appeal, and an applicant/EAP/independent person for purposes of being informed and given access to an audit report. This information may be made available in terms of section 11(1)(c) and 11(1)(d) of the POPIA, without requiring consent.

Kind regards/Vriendelike groete

**Johmandie Pienaar**

Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287



Proof  
~

Postal Address	Proof
Department of Agriculture Attention: Mr Cor van der Walt Admin Building, Muldersvlei Road, Eisenburg 7606  Tel: 021 808 5099	<b>PostNet Bellville Edward Street</b> 021 910 1221 bellville@postnet.co.za Private Bag X 21 Tygervalley, 7536

**DATE:** 08 September 2025

Department of Agriculture  
Private Bag X1  
Eisenburg  
7606  
Att: Cor van der Walt

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT  
IMERY'S REFRACTORY MINERALS SOUTH AFRICA: CAPE BENTONITE MINE  
PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER  
RE/582, RIVERSDALE, WESTERN CAPE  
DMR Ref: WC 30/5/1/1/2/10507PR**

Good day,

Enclosed please find a CD copy of the Draft Basic Assessment Report for the above mentioned application.

You are hereby notified of the 30 day commenting period (starting from the date of this letter and excluding public holidays) within which you must please provide your comments on the abovementioned report.

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287





**Enviro-EAP**  
Environmental Consultants



Proof

Postal Address	Proof
Department of Agriculture, Land Reform and Rural Development Attention: Lutendo Netshilema Polkadraai Road (R310) Stellenbosch 7600.  Tel: 021 944 1423	PostNet Bellville Edward Street 021 910 1221 bellville@postnet.co.za Private Bag X 21 Tygervalley, 7536

**DATE:** 08 September 2025

Department of Agriculture, Land Reform and Rural Development  
Directorate: Land and Soil Management  
Private Bag X5015  
Polkadraai Road  
Stellenbosch  
7599  
Att: Lutendo Netshilema

**NOTIFICATION OF AVAILABILITY OF THE DRAFT BASIC ASSESSMENT REPORT  
IMERY'S REFRACTORY MINERALS SOUTH AFRICA: CAPE BENTONITE MINE  
PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER  
RE/582, RIVERSDALE, WESTERN CAPE  
DMR Ref: WC 30/5/1/1/2/10507PR**

Good day,

Enclosed please find a CD copy of the Draft Basic Assessment Report for the above mentioned application.

You are hereby notified of the 30 day commenting period (starting from the date of this letter and excluding public holidays) within which you must please provide your comments on the abovementioned report.

**Johmandie Pienaar**  
Environmental Assessment Practitioner  
EAPASA Registration Nr. 2020/2326



**Enviro-EAP**  
Environmental Consultants



Email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Cell: 072 240 3092

Fax: 086 435 4691

Web: [www.enviro-eap.co.za](http://www.enviro-eap.co.za)

Postal Address: Enviro-EAP  
PO Box 205  
Agulhas  
7287

PostNet Name: PostNet - Bellville Edward Street

Tel. No.: (+27) 021 910 1221 Acc. No.: PN603



Senders Copy

PNA60388151601

From: (Sender) PostNet - Bellville Edward Street  
(Company Name)  
Street Address 78 Edward Street

Suburb Bellville City/Town Cape Town

Country South Africa Code 7530

Contact Johmandie Pienaar Tel (+27) 722403092

E-mail bellville@postnet.co.za

To: (Receiver) DPT of Agriculture LandReform  
(Company Name)

Street Address polkadraai road R310

Suburb STELLENBOSCH City/Town STELLENBOSCH - S

Country South Africa Code 7600

Contact Lutendo Netshilema Tel (+27) 219441423

E-mail

Insurance Yes  If yes, state value

Domestic  Express Courier  Economy (48-72hrs)  Dawn Courier  Saturday  Non Express (24-48hrs)  Same Day Courier  Other Specify  Public Holiday After Hours

SPECIAL INSTRUCTIONS

International  DOCUMENTS  NON-DOCUMENTS

No. of Parcels	Description of goods	Length in cm	Breadth in cm	Height in cm	Mass in kg
1	DOCS	40.00	30.00	2.00	0.49

WE HAVE SEEN AND AGREE TO THE STANDARD CONDITIONS OF CARRIAGE (OVERLEAF) WHICH SHALL APPLY TO THIS CONSIGNMENT AND ALL FUTURE CONSIGNMENTS ACCEPTED BY POSTNET. WE FURTHER DECLARE THAT THIS CONSIGNMENT DOES NOT CONTAIN DANGEROUS GOODS.

EXPRESS PACK SECURITY NUMBER ON LIP OF FLYER

SENDER'S DETAILS

Name: Johmandie Pienaar Date: 2025-09-08

Signature: Time: 11:30:00

1 Total No. of Parcels Total Vol 0.48 Total Mass 0.49

POSTNET AND ARAMEX RESERVE THE RIGHT TO MARK THE SERVICE "OVERNIGHT EXPRESS" FOR "DOMESTIC" SHOULD NO SERVICE BE SELECTED

ACCEPTED BY POSTNET

CHARGES RANCS GENTS

**POSTNET Courier**  
an aramex company

JOANA  
Name  
Signature  
2025-09-08 11:30:00  
Date Time

CHARGES	RANCS	GENTS
Basic Tariff		
Surcharge		
Insurance		
Packaging Surcharge		
VAT		
TOTAL INCL. VAT		

To track your shipment go to: [www.postnet.co.za](http://www.postnet.co.za) or download the PostNet Courier App

## **PROOF OF COMMENTS RECEIVED ON DRAFT BASIC ASSESSMENT REPORT**

### **Heritage Western Cape**

**From:** Stephanie Barnardt <Stephanie.Barnardt@westerncape.gov.za>

**Sent:** Tuesday, 02 September 2025 07:34

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>; Ceoheritage <Ceoheritage@westerncape.gov.za>

**Subject:** RE: NOTIFICATION OF 30 DAY COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

Good day Johmandie

Thank you for giving HWC the opportunity to comment.

Please included HWC reference number in the initial email to prevent delay in responding to your emails.

Please note that our previous comment still stands, no further action is required from heritage.

**Kind regards,**

**Stephanie-Anne Barnardt-Delport**  
**Heritage Officer (Archaeologist)**  
**Heritage Western Cape**

Heritage Resource Management Services  
Protea Assurance Building Greenmarket Square, Cape Town  
(Currently working remotely)

Website: [www.hwc.org.za](http://www.hwc.org.za) / [www.westerncape.gov.za](http://www.westerncape.gov.za)



## Transnet

**From:** Anel Abrahams Transnet Freight Rail CPT <Anel.Abrahams@transnet.net>

**Sent:** Tuesday, 02 September 2025 08:41

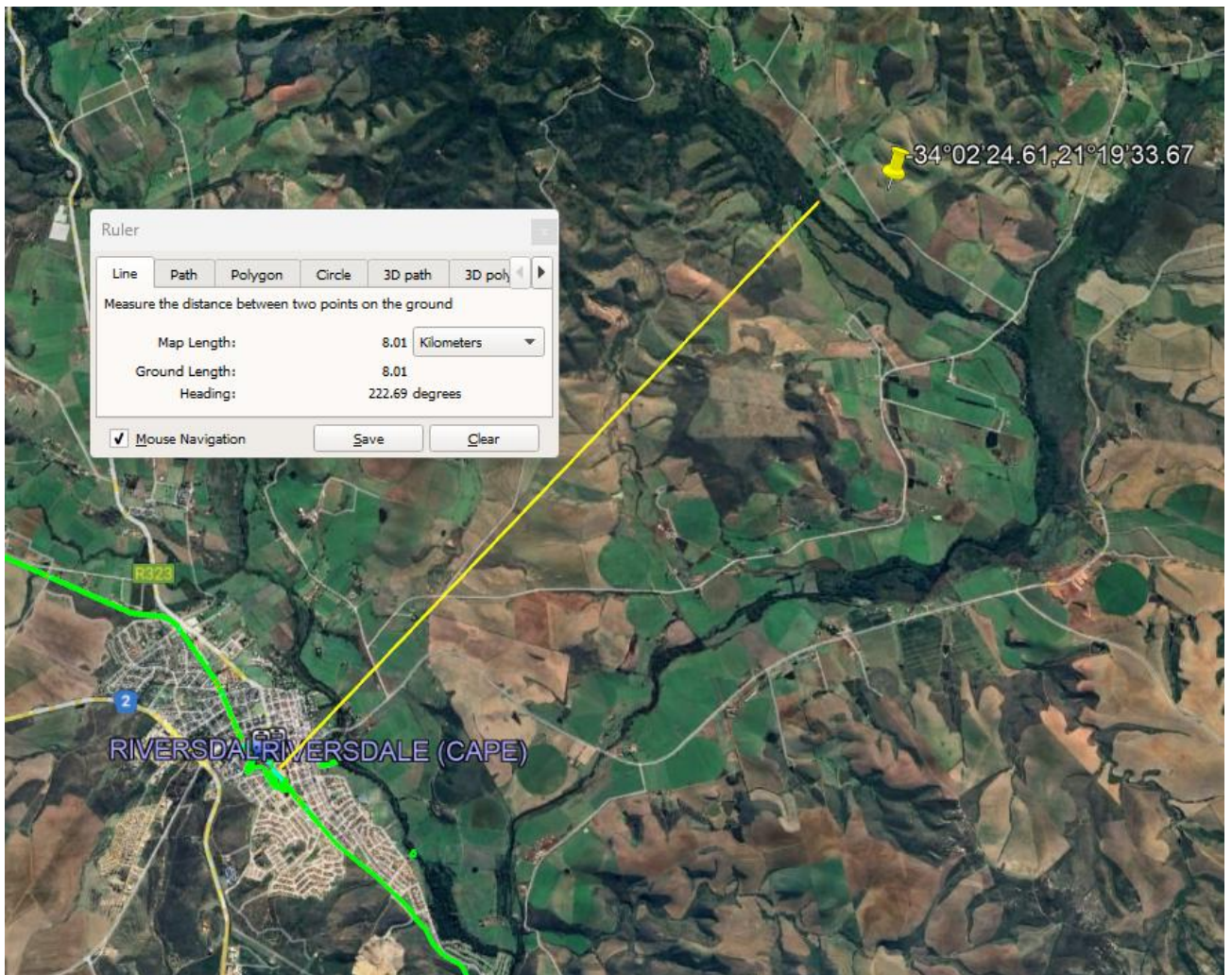
**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Subject:** FW: NOTIFICATION OF 30 DAY COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

Good day

Your e-mail below refers.

This application will not directly affect Transnet, the proposed site is approximately 8 km away from Riversdale Station on the Worcester to Riversdale railway line.



*Anel Abrahams*

Infrastructure Maintenance, Bellville  
Transnet Rail Infrastructure Manager (TRIM)

☎ 021 940 2011    ☎ 000 000 000

☎ 000 000 0000    ✉ [anel.abrahams@transnet.net](mailto:anel.abrahams@transnet.net)

[www.transnet.net](http://www.transnet.net)



101 York Street 3rd Floor Room 302 George 6530 PO Box 1205 George 6530

Mr. Mthimkhulu

☎:023 346 8000

✉:mmthimkhulu@bgcma.co.za

📍:6/5/2/H80C/WEGWYZERS RIVIER RE/582, RIVERSDALE,

**ENVIRO-EAP**  
PO Box 205  
Aguilhas  
7287

**Attention: Johmandie Pienaar**

Dear Madam,

**COMMENTS ON THE PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

The above-mentioned report with DMPR Ref: WC 30/5/1/1/2/10507PR has reference.

The Breede-Olifants Catchment Management Agency (BOCMA) has the following comments:

1. No operation is allowed within 100m of a water resource or 1:100-year flood line, whichever is the greatest. If the proposed activity falls within this area, authorisation needs to be put in place in terms of the National Water Act (NWA), 1998 (Act No. 36 of 1998). This is to ensure that the riparian ecological status of the water resource will not be negatively impacted.
2. Please note that any development within 500m from the boundary of any wetland requires authorisation in terms of the National Water Act (NWA), 1998 (Act No. 36 of 1998).
3. No water may be abstracted from any surface water body and groundwater unless authorized by this Agency.
4. Where solid waste disposal is to take place on site, ensure that only non-toxic materials which have no risk of polluting the groundwater, are buried in designated approved areas at acceptable depths below ground level.
5. No surface, ground or storm water may be polluted because of any activities on the site.
6. The rehabilitation of the site must ensure that the final condition of the site is environmentally acceptable and that there will be no adverse long-term effects on the surrounding environment especially the water resources.
7. Please note that all requirements as stipulated in the National Water Act (NWA), 1998 (Act No. 36 of 1998) must be adhered to.

8. Please note that this Agency reserves the right to amend and / or add to the comments made above in the light of subsequent information received.

If you have any questions, please don't hesitate to contact the official at the above-mentioned details.

**MR. JAN VAN STADEN**



**CHIEF EXECUTIVE OFFICER (ACTING)**

**DATE: 15/09/2025**

---



CONSERVATION INTELLIGENCE: SOUTH

postal 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
physical 16 17<sup>th</sup> Avenue, Voëlklip, Hermanus, 7200  
website [www.capenature.co.za](http://www.capenature.co.za)  
enquiries Rhett Smart  
telephone 087 087 8017  
email [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
reference LS14/2/6/1/6/5/582\_prospecting\_Riversdale  
date 3 October 2025

Enviro-EAP (Pty) Ltd  
P.O. Box 205  
Agulhas  
7287

Attention: Johmandie Pienaar  
By email: [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

Dear Ms Pienaar

**Draft Basic Assessment Report and Environmental Management Programme Report for the Proposed Prospecting for Bentonite and Zeolite on the Remainder of Farm Wegweyzers Rivier 582, Riversdale (DMR ref. no.: WC30/5/1/1/2/10507PR)**

CapeNature would like to thank you for the opportunity to comment on the application and would like to make the following comments.

CapeNature objected to the prospecting proposal presented in the previous version of the application due to the proximity of the prospecting areas to the highly sensitive palmiet (*Prionium serratum*) wetland associated with the Kruis River.

The prospecting proposal has been subsequently amended to exclude prospecting areas located between the public road and the Kruis River wetland. The broad prospecting areas presented previously have also been refined into four smaller prospecting blocks with the proposed prospecting holes indicated.

The four specialist studies encompassing the terrestrial biodiversity, aquatic biodiversity, animal species and plant species themes have been amended to reflect the refined prospecting proposal restricted to the areas upslope of the public road.

The aquatic biodiversity compliance statement has not been amended to report on the Kruis River wetland. However, based on measurements on CapeFarmMapper, the prospecting holes for the current proposal are more than 100 m away from the wetland delineated on the National Wetland Map (NWM) and more than 300 m away from the palmiet wetland habitat (part of the NWM wetland is occupied by cultivated lands). We are therefore satisfied

The Western Cape Nature Conservation Board trading as CapeNature

Board Members: Ms Marguerite Loubser (Chairperson), Prof Gavin Maneveldt (Vice Chairperson), Mr Tom Blok, Ms Reyhana Gani, Dr Colin Johnson, Ms Ayanda Mvandaba, Prof Nicolaas Olivier, Ms Chwayita Shude-Mareka, Dr Razeena Omar

that the precautionary approach has been applied, and the proposed prospecting holes are sufficiently far from the Kruis River wetland to not have an impact on the wetland. It is therefore not necessary for a buffer zone to be calculated in terms of the buffer zone tool, and a peer review of the aquatic biodiversity compliance statement is not required.

A groundwater specialist statement was compiled as recommended in our comments. The specialist study assessed the revised proposal restricted to upslope of the public road. Confirmation is provided that the subsurface conditions within the prospecting area are an aquiclude rather than an aquifer and therefore support minimal groundwater resources. The conclusion is that the proposed prospecting activities will have minimal/no impact on groundwater resources.

We wish to highlight that the concern raised regarding geohydrology related to the prospecting areas adjacent to the Kruis River wetland which have been removed. The proposed prospecting areas are on a similar altitude as the wetland and if the proposal progressed to mining stage could have resulted in mining below the level of the wetland and potential ingress of groundwater into the mining area with potential impacts on the hydrology of the wetland. Concerns raised regarding geohydrology were not related to groundwater abstraction.

In conclusion CapeNature is satisfied that concerns have been adequately addressed and does not object to the revised prospecting proposal. We do however wish to note that the follow-on mining proposal will need to be evaluated separately to the prospecting proposal.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Regards

**Rhett Smart**  
Digitally signed  
by Rhett Smart  
Date: 2025.10.03  
13:17:49 +02'00'

Rhett Smart

For: Manager: Landscape Conservation Intelligence South

cc. Jeanne Gouws, CapeNature



Department of Environmental Affairs and Development Planning

**Adri La Meyer**

Development Facilitation

Adri.Lameyer@westerncape.gov.za | Tel: 021 483 2887

**References:**

18/2/3/2025-2026 (Development Facilitation)  
19/2/5/3/D5/7/WL0162/24 (Waste Management)  
19/4/4/1/BH1\_Farm Wegwyzers Rivier, Riversdale (Air Quality Management)

**Enquiries:**

Ms Adri La Meyer - Directorate: Development Facilitation  
Email: [Adri.LaMeyer@westerncape.gov.za](mailto:Adri.LaMeyer@westerncape.gov.za); Tel.: (021) 483 2887

Ms Vanessa Anders – Directorate: Waste Management  
Email: [Vanessa.Anders@westerncape.gov.za](mailto:Vanessa.Anders@westerncape.gov.za); Tel.: (021) 483 0799

Ms Palesa Mathiba - Directorate: Air Quality Management  
Email: [Palesa.Mathiba@westerncape.gov.za](mailto:Palesa.Mathiba@westerncape.gov.za); Tel.: (021) 483 2888

**Attention:** Ms Jahmandie Pienaar

Enviro-EAP (Pty) Ltd  
P.O. Box 205

**AGULHAS**  
7287

[jahmandie@enviro-eap.co.za](mailto:jahmandie@enviro-eap.co.za)

Dear Madam

**COMMENTS ON THE DRAFT BASIC ASSESSMENT REPORT FOR THE PROPOSED PROSPECTING RIGHT ON THE REMAINDER OF FARM WEGWYZERS RIVIER NO. 582, RIVERSDALE (DMPR REF: WC 30/5/1/1/2/10507PR)**

1. The mail notification of 07 August 2025 regarding the availability of the Draft Basic Assessment Report ("BAR") refers. Thank you for the opportunity to provide comments on the Draft BAR and associated Environmental Management Programme ("EMP") dated 25 July 2025 that were available for download from the website of the environmental assessment practitioner.
2. Compliance Statements for the animal species and aquatic biodiversity themes were compiled by Mr Nicolaas Hanekom, a registered Professional Natural Scientist with the South African Council for Natural Scientific Professions in the field of Ecological Science, and a Candidate Natural Scientist in the field of Aquatic Science, Conservation Science and Zoological Science. In this regard, please refer to *The Species Environmental Assessment Guideline: Guidelines for the implementation of the Terrestrial Fauna and Terrestrial Flora Species Protocols for environmental impact assessments in South Africa (2022)*. According to the Species Environmental Assessment Guideline: "It is, however,

[www.westerncape.gov.za](http://www.westerncape.gov.za)

Department of Environmental Affairs and Development Planning  
Cape Town Office: Utilitas Building, 1 Dorp Street Cape Town, 8001  
George Office: York Park Building, 93 York Street, George, 6529



*acceptable for Candidate Natural Scientists (Cand.Sci.Nat.) to work under the supervision of a Professional Natural Scientist (Pr.Sci.Nat) who signs off on their work, but only if the person qualified as Pr.Sci.Nat is present on site during the field survey and appends a signed declaration to the report stating that all facets of the work performed by the Cand.Sci.Nat. were appropriately supervised."* Considering that Mr Hanekom is a Cand.Sci.Nat in the fields of aquatic and zoological science and no Pr.Sci.Nat was present during the field surveys, the Department recommends that the competent authority requests an independent review of the Compliance Statements undertaken for the Animal Species and Aquatic Biodiversity themes.

3. One of the management actions of the Specialist Statement of Risks to Groundwater of Proposed Clay Prospecting Activities compiled by Gerhard Steenekamp dated March 2025 is that drill sites should be demarcated/ have a perimeter fence. This recommendation appears to be unsuitable seeing that sampling and drill sites will be rehabilitated on the same day after completion of invasive prospecting activities.
4. It is recommended that the proposed prospecting areas indicated as Map 5 of Appendix B be superimposed on the no-go areas map (Map 8) to provide a combined map of the proposed prospecting areas overlain on the site's environmental sensitivities and no-go areas.
5. Whilst the Draft BAR acknowledges compliance with the requirements of the Western Cape Noise Control Regulations published in Provincial Notice 200/2013, please include these Regulations in the table dealing with the Policy and Legislative Context of the BAR.
6. Any green waste generated must be taken to an approved green waste management facility such as a composting facility and not to a landfill, as indicated on page 300 of the EMPr. The Department initiated a ban of all organic waste to landfill by 2027. It is therefore advised that organics be separated from the general waste stream and beneficiated, where possible.
7. Incident management and reporting detailed in the EMPr must include the immediate containment and remediation of the affected area, and notification of the incident to the relevant authorities, including Hessequa Municipality and the Department's Pollution and Chemicals Management Directorate: Remediation Unit.
8. Please note that the abovementioned comments and recommendations do not pre-empt the outcome of the application. No information provided, views expressed and/or comments made by the Department should in any way be regarded as an indication or confirmation that additional information or documents will not be requested; or of the outcome of any application submitted to the competent authority.
9. The applicant is reminded of its "general duty of care towards the environment" as prescribed in section 28 of the National Environmental Management Act, 1998 (Act No. 107 of 1998) which states that "Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot

*reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment."*

The Department reserves the right to revise initial comments and request further information based on any or new information received.

Yours sincerely

**Thea Jordan** Digitally signed by Thea Jordan  
Date: 2025.10.03 16:14:54  
+02'00'

*pp* **HEAD OF DEPARTMENT**

**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**

Letter signed by:

**THEA JORDAN**

Director: Development Facilitation

**Date: 3 October 2025**

**PROOF OF MR. NICOLAAS HANEKOM SUITABLE QUALIFICATIONS AS REGISTERED WITH SACNASP FOR ECOLOGICAL SCIENCE FIELD TO CONDUCT AQUATIC BIODIVERSITY ASSESSMENTS**

**From:** Phutiane Letsoalo <Phutiane.Letsoalo@sacnasp.org.za>

**Sent:** Friday, 01 August 2025 12:55

**To:** Nicolaas Hanekom <nicolaas@enviro-eap.co.za>

**Cc:** SACNASP Registrations <registrations@sacnasp.org.za>

**Subject:** RE: Guidance on which registration category or field will be required to conduct Freshwater specialist conducting aquatic biodiversity assessments.

Dear Nicolaas,

A freshwater specialist conducting aquatic biodiversity assessments would typically register under **Ecological Science field of practice** or Aquatic Sciences, depending on the specific job that the Scientist is carrying out. Ecological Science field mainly covers professionals who work on ecosystems, biodiversity, and environmental assessments, including freshwater ecosystems. Sometimes as alluded above, depending on the task/job that the Scientist carries out, it might fall under Aquatic Science or a related field within Conservation Sciences.

The following are typical tasks that a freshwater specialist conducting aquatic biodiversity assessments can be involved in:

1. Surveying and sampling freshwater ecosystems (rivers, lakes, wetlands, etc.) to collect data on species presence, abundance, and diversity.
2. Identifying aquatic species, including fish, macroinvertebrates, algae, and plants.
3. Assessing ecosystem health and water quality by analysing biological indicators.
4. Evaluating impacts of environmental changes or developments on freshwater biodiversity.
5. Compiling reports and data summaries to inform conservation decisions, environmental impact assessments (EIAs), or resource management plans.
6. Recommending mitigation measures or conservation strategies based on assessment results.
7. Compliance and regulation work related to freshwater biodiversity protection laws and policies.

I hope you find all in order.

Kind Regards,

**Mr. Phutiane Letsoalo Pr.Sci.Nat**  
Scientific Advisor



Suite L1, Enterprise Building,  
Innovation Hub ,Pretoria ,0001

[www.sacnasp.org.za](http://www.sacnasp.org.za)

[Phutiane.Letsoalo@sacnasp.org.za](mailto:Phutiane.Letsoalo@sacnasp.org.za) | T: +27 12 748 6530



agriculture

Department:  
Agriculture  
REPUBLIC OF SOUTH AFRICA

**Directorate: Land and Soil Management**

Quarantine Station, Polkadraai Road, Stellenbosch, 7599

Tel: 021 809 0284 e-mail: LutendoN@dalrrd.gov.za

Enquiries: Lutendo Netshilema Date: 10/10/2025

**Enviro-EAP (Pty) Ltd**

**2 School Street**

**Agulhas**

**South Africa**

**7287**

Email: [Johmandie@enviro-eap.co.za](mailto:Johmandie@enviro-eap.co.za)

DMRE Ref: WC30/5/1/1/2/10507PR

**RE: COMMENTS ON DRAFT BASIC ASSESSMENT REPORT FOR IMERYS  
REFRACTORY MINERALS SOUTH AFRICA: CAPE BENTONITE MINE PROPOSED  
BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS  
RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

Department of Agriculture, Land Reform and Rural Development; Directorate: Land and Soil Management administer and implement the Conservation of Agricultural Resources Act, (CARA) 43 of 1983). The Act is regarded as one of the principal Acts governing the protection of agricultural and other natural resources. The main aim of the Act is to control the utilization of natural agricultural resources to ensure the conservation of soil, water and vegetation, as well as the combating of alien and invasive plants. According to Section 1 of the Act, conservation of natural agricultural resources includes the protection, restoration as well as the reclamation thereof.

The objectives of CARA are to provide for the conservation of the natural agricultural resources through maintaining the production potential of the land, combating and prevention of erosion, preventing the weakening or destruction of the water resources, protecting the vegetation and combating weeds and invader plants.

Imerys Refractory Minerals South Africa (Pty) Ltd appointed Enviro-EAP Environmental Services to facilitate the EIA process seeking Environmental Authorization to prospect for bentonite and zeolite on the Farm Wegwyzers Rivier RE/582 in the Western Cape, Division Riversdale. Cape Bentonite Mine proposes to apply for a prospecting right to prospect for bentonite and zeolite on the Farm Wegwyzers Rivier RE/582 near the town of Riversdale in the Western Cape.

**Kindly note the previous comments submitted from this office, dated 10 September 2024 are still valid. You therefore required complying with the following requirements.**

- All regulations of the Conservation of Agricultural Resources Act, (CARA) 43 of 1983) should at all time be observed, and the proposed mitigation measures as mentioned in the report.

The Department reserves the right to revise its initial comments and request further information from you based on any new or revised information received.

Yours sincerely

  
\_\_\_\_\_

**pp. EXECUTIVE OFFICER: Act No 43 OF 1983**  
**Director: Land and Soil Management**

## Registered I&AP 29

**From:** [REDACTED]

**Sent:** Thursday, 02 October 2025 13:53

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Cc:** louw@malherbelow.org

**Subject:** RE: NOTIFICATION OF 30 DAY COMMENTING PERIOD COMMENCEMENT: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE

Hi Johmandie,

Please find attached our comment on the above.

Kindly acknowledge receipt by return email.

With thanks and kind regards,

[REDACTED]

To: Johmandie Pienaar (Enviro-EAP)

**COMMENTS ON: DRAFT BASIC ASSESSMENT REPORT FOR PROPOSED BENTONITE AND ZEOLITE PROSPECTING RIGHT ON FARM WEGWYZERS RIVIER RE/582, RIVERSDALE, WESTERN CAPE**

For the reasons listed below, we OBJECT to the proposed listed activities associated with Bentonite and Zeolite prospecting and mining activities on the farm WEGWYZWERS RIVIER RE/582, Riversdale, Western Cape.

**1. PROXIMITY TO A WETLAND AND NEGATIVE IMPACT ON PROTECTED AREAS, VEGETATIONS AND WETLANDS**

- The site's proximity to a FEPA Wetland with a Very High sensitivity for aquatic biodiversity/CBA1 classification and contamination and disturbance risk posed by the activities due to the proposed site's proximity to the Kruisrivier and Wetland means that mining activities will cause irreversible damage to the Wetland.
- The prospecting/mining activity site is within its catchment area and mining would have the potential impact of erosion, alteration of the beds, groundwater pollution, water contamination and increased risks of sediment load in water sources, disruption of ancient aquifers, surface water resources pollution, transformation and degradation. It can also decrease the amount of water reaching the wetland or affect water quality.
- According to the provincial and national government environmental data maps the "prospecting property" and its surroundings have high agricultural potential, it incorporates wetland areas, and it incorporates critically endangered ecosystems/threatened ecosystems.
- Almost the entire study area is located within the 500m regulated area for wetlands.
- The study area incorporates wetlands and watercourses and the impacts of holes to be drilled across the property on the sub-surface hydrology and surface hydrology will impact the wetland directly. They will act as "cut off trenches" and could have a significant detrimental impact on the sub-surface water movement, the wetland and watercourses and the ecological integrity of the open spaces and ecosystems associated with the watercourses/rivers/ wetland.
- The availability of services and storm water management for the prospecting activities is questioned.

**2. RISK POSED BY INCREASED TRAFFIC**

- The impact of increased traffic from heavy mining vehicles and mining equipment will extend beyond the mining site and will include the risks and impacts when mining vehicles use the Kruisriver road when mined bentonite is to be trucked from the site to the Processing Plant at the head offices on Erf 1412, Heidelberg or when mining and/or prospecting equipment is moved to and from the site.
- P122 of the Hessequa 2017-2022 IDP reiterates that Section 24 of the Constitution of the Republic of South Africa, 1996, calls on the State to *secure everyone the right to an environment that is not harmful to health or well-being. An important component of*

*ensuring a healthy environment is an understanding of the impact of human activities on the environment and the health and well-being of those who live in and depend on that environment.*

- The heavy equipment and vehicles to be utilised will have a dire deleterious effect on the welfare of people who live and work on the road and will pose a huge safety risk to pedestrians and children who use the road on a daily basis as the main access road to and from Riversdale as well as on animals and livelihoods.
- Pedestrians and vehicles share the road and the loss of visibility due to dust levels pose a safety risk to pedestrians and vehicles that often stop to pick up or drop off pedestrians along the road.
- Many dwellings are situated right on the road, not set back at a distance, which means the risks posed to safety by increased traffic are direct.
- A school sits directly on the route to the proposed operation site and this will pose a great safety and health risk to the children who walk along this road on a daily basis to and from school as well as the children who wait at the various collection points along this road that is used for transportation to schools in Riversdale.
- Visibility is often poor along the road due to rainy or misty weather or already existing dust levels and during the winter months when children use this road when it is often still dark, increasing risk to their safety when a large number of proposed heavy mining vehicles will use the route.
- This road also passes through a wetland, a sensitive aquatic biodiverse area.
- The mining activities pose an increased risk through mining related traffic to animals and agricultural activities on this road i.e., the risk to high incidence of animal traffic on this road multiple times a day to and from 3 dairies along the road and livestock being moved between pastures and farms along the route.
- Many farms straddle both sides of the road so this road is crucial arterial to agricultural activities and impact will pose huge safety risks and disrupt agricultural activities.
- The presence of so many sensitive receptors along this route is cause for concern.
- The high level of pedestrian and livestock usage of this “arterial” road which is crucial to daily life and agriculture makes mining activities incompatible with agricultural activities, livelihood and the safety and wellbeing of the people who live and work there creating a pattern of consistent negative impact.

### **3. IMPACT OF INCREASED DUST LEVELS ON AGRICULTURE AND LIVELIHOODS**

- The continual nature of the mining and hauling operation will create significantly dust levels.
- The detrimental effect of increased dust on the health of pastures and crops and exposure to increased airborne dust created by mining traffic to agricultural activities will be highly detrimental.
- Dust pollution caused by mining vehicles carries potential long term health impacts for people, animals and crops and this area is subject to high winds which makes it impossible to control the direction of or mitigate the negative impact of dust created by open cast mining activities.

- Open cast mining activities are not compatible with the agricultural activities in the area and therefore mining activity should not even be considered next to agricultural land which contribute significantly to food security. Mining will be in direct competition with the agricultural activities in the area.
- It is well known that dust has a severe negative effect on crops and trees and dust falling onto plants may physically smother leaves or cause leaf injury, reduce fruit setting and cause general reduction in growth. It can also physically block stomata or cause stomatal damage, prevent pollen germination, cell plasmolysis, negatively impact plant respiration and photosynthetic activity and leads to reduced growth and yield. The close proximity to a Macadamia and Citrus farm as one example will have as it's effect huge damages to agricultural and economic activity in the area and make it potentially unviable.
- The livelihood of families along the road depend on agricultural activities and negative impact on this could cause huge damages to livelihoods and the chemical and physical effect of dust on soil can reduce viability of portions of agricultural lands.

#### 4. RESOURCE AVAILABILITY: WATER SCARCITY

- The availability of water in a rural area for mining purposes is an integral necessity and as such and if same is not available, the mining operations will have a negative impact on water resources which is crucial for agriculture.

#### 5. IMPACT ON ANIMAL SPECIES:

- The importance of this area is emphasized in the Biodiversity Sector Plan for Hessequa and Mosselbay Municipalities of 2010 and states on Pt 28 of 56 that:
- *The area between the Langeberg-Outeniqua Mountain Ranges and the coastline is characterized by rows of koppies (hills). The vegetation on these koppies generally consists of fynbos on the southern slopes, Renosterveld on the top and northern slopes, and subtropical thicket along the drainage areas and within those areas secluded from fires... The koppies also provide habitats somewhat different to those of mountainous regions and are therefore important endemic herpetofaunal habitats. Furthermore, they act as stepping stones within the landscape which are frequented by birds such as Victorin's warbler, Protea canary, Orange breasted sunbird, Cape rock jumper and Cape sugarbird, as well as the grysbok (small indigenous antelope species), which requires pristine veld and is sensitive to inappropriate burning and grazing patterns and alien plant infestations.*
- Despite the special biology of these koppies, most of them are under extreme threat and the impact of mining activity will exacerbate this threat as well as pose a great risk to faunal movement.

We are of the opinion that the cumulative negative impacts will have significant detrimental effect on the bio-physical and socio-economic environments.

For the reasons listed above, we OPPOSE the proposed ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE PROSPECTING AND MINING RIGHT ON FARM WEGWYZERS RIVIER RE/582 RIVERSDAL - WESTERN CAPE.



## Registered I&AP 10


**From:** [REDACTED]  
**Sent:** Monday, 29 September 2025 09:40  
**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>  
**Subject:** Objection

Beste Johmandie

Vind asb my bydrae om die pragtige omgewing to prober beskerm. Die beswaar is namens to [REDACTED]  
[REDACTED]

Groete

[REDACTED]



29 September 2024

Department Mineral Resources  
c/o [johmandie@enviro-eap.co.za](mailto:johmandie@enviro-eap.co.za)

RE: **DRAFT BASIC ASSESSMENT REPORT AND DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT FOR PROSPECTING RIGHTS ON FARM WEGWYZERSRIVIER RE/582 RIVERSDALE WESTERN CAPE (DMRE REF. WC30/5/1/1/2/1050/7 PR)**

- 1 The following information is not provided in the draft report:
  - 1.1 The number of drill rigs that will be used during exploration on the farm.
  - 1.2 The route/road that the drill rigs will use to get to the farm.
  - 1.3 The duration of the drilling operations.
  - 1.4 The hours during which the drilling will take place.
  - 1.5 The number of vehicles that will be involved in the prospecting operations and the 4 routes they will use to get to the farm.
  - 1.6 The level of noise that will be created by the use of the push sampler drills and the drilling of the boreholes.
- 2 There has not been proper notice.

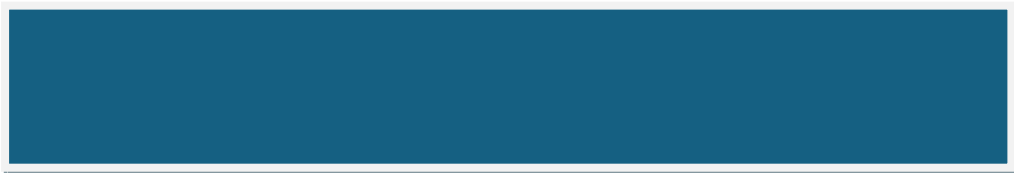
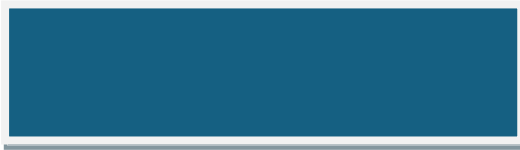


- 2.1 As the route that the drill rigs will take has not been disclosed all interested parties have not been notified and people along the route/s that will be used do not even know that they will be impacted. This is a fundamental omission.
- 2.2 Previously the response to such an objection was that the Applicant is entitled to use public roads. That is not an answer to the question whether there will be an excessive impact. The question is not whether the prospecting (and use of the road) will be lawful but whether there will be interferences with other rights.
- 3 On page 12/310 (paragraph g, 4<sup>th</sup> bullet point) the Applicant seeks to motivate its application by stating that *“if additional viable bentonite and zeolite deposits are discovered ... the lifespan of the mining company can potentially be extended promoting ongoing socio economic benefits that the mining company is providing to the local communities”*.
- 4 In support of its allegation that it is providing these socio economic benefits it alleges that:
  - 4.1 It employs 54 people (paragraph f) its socio labour plan consists of a 5 year investment plan including certain projects.
  - 4.2 It is supporting on a daily basis local suppliers.
  - 4.3 It pays royalties to the landowners where the mining activities occur.
- 5 The following information is however not provided.
  - 5.1 What the total value is of the payments to the 54 people.
  - 5.2 What the value in Rands are of the purchases from local suppliers in relation to bentonite production.
  - 5.3 What the amount is that is invested in socio economic projects.
- 6 At the moment bald allegations are made relating to alleged benefits from the mining operations. What is not disclosed are:
  - 6.1 The additional cost in road maintenance.



- 6.2 The inconvenience created by the noise through the mining activities and the transportation over the gravel farm roads.
  - 6.3 The dust created through vehicles travelling on the farm roads.
  - 6.4 The damage done the gravel roads which financially affects all other users of those roads.
- 7 A further aspect that is not mentioned is that once the mining has taken place on the section of land that is currently used and is usable for food production is that it will be forever be lost to food production and that section of productive land will never again be usable for food production. A short term benefit is therefore to be weighed up against a long term loss. Once mining has taken place that farm cannot be used for any other purpose thereafter ever again. The hole that is excavated through the mining operation is permanent and will not be filled up again and the land will not become usable.
- 8 On the basis of the lack of information and the permanent damage that will be created through the mining operation and the damage to the roads, and the dust created during the process of exploration and mining the application is opposed.

Yours faithfully



## Registered I&AP 13

**From:** [REDACTED]

**Sent:** Thursday, 02 October 2025 15:07

**To:** Johmandie Pienaar <johmandie@enviro-eap.co.za>

**Cc:** willry.vanbreda@dmr.gov.za

**Subject:** Objection to the Application for Prospecting Rights on the Farm Wegwyzersrivier RE/582

Dear Johmandie,

Please see attached files for the Formal Objection to prospecting rights application by Imerys Refractory Minerals on the Farm Wegwyzers Rivier RE/582.

Please confirm receipt.

Regards

[REDACTED]

# FORMAL OPPOSITION TO PROSPECTING RIGHT APPLICATION

## IMERYS REFRACTORY MINERALS SOUTH AFRICA

**Date:** 29 September 2025

**To:** The Department of Mineral Resources and Energy (DMRE)

**Subject:** FORMAL OBJECTION TO PROSPECTING RIGHT APPLICATION BY IMERYS REFRACTORY MINERALS SOUTH AFRICA - APPLICATION REF: WC30/5/1/1/2/10507PR

---

### PROSPECTING APPLICATION DETAILS

**Applicant:** Imerys Refractory Minerals South Africa (Pty) Ltd t/a Cape Bentonite Mine

**Applicant Address:** Cape Bentonite Mine, Princess Farm, PO Box 242, Heidelberg, Western Province 6665

**Applicant Contact:** Tel: 028 722 2011, Fax: 028 722 2927

**Target Farm:** Wegwyzers Rivier RE/582, Riversdale, Western Cape

**Application Reference:** DMRE Ref: WC30/5/1/1/2/10507PR

**Minerals:** Bentonite and Zeolite

---

### OBJECTING PARTY DETAILS



### GROUNDS FOR OBJECTION

#### 1. IMPACT ON ADJACENT AGRICULTURAL OPERATIONS

I am [REDACTED] owner/operator of a 100-hectare mixed macadamia and citrus orchard development established in 2022 on the property directly adjacent to Wegwyzers Rivier RE/582. I also represent all parties listed in the petition list added as an addendum A. The proposed prospecting activities for bentonite and zeolite mining on the neighboring farm will directly impact on our established agricultural operations for the following reasons:

- **Water Contamination Risk:** Mining runoff water will flow onto our agricultural property, potentially contaminating irrigation water and affecting crop quality
- **Shared Water Resource Impact:** Mining operations could affect shared groundwater aquifers and water availability essential for our irrigation systems
- **Heavy Traffic Impact:** Increased heavy vehicle traffic on our gravel roads will cause deterioration and safety hazards for farm operations, particularly as materials will need to be transported to their existing processing facility in Heidelberg. Significant impact on roads and low water bridges will occur.
- **Transportation Route Damage:** The additional truck traffic required to transport bentonite and zeolite to Cape Bentonite Mine's existing Heidelberg facility will cause significant damage to local road infrastructure.
- **Investment Devaluation:** Our substantial 2022 development investment in mixed macadamia and citrus orchards faces significant depreciation due to adjacent mining activities.

## 2. ENVIRONMENTAL AND QUALITY OF LIFE IMPACTS

- **Runoff Water Pollution:** Mining activities will generate contaminated runoff water that will flow directly onto our agricultural property, potentially affecting soil quality and crop irrigation
- **Visual Pollution:** Both dwelling units on our property have direct sight lines (together with others) to the proposed mining site, which will permanently destroy the agricultural landscape and rural character.
- **Noise Pollution:** 24/6 mining operations will generate continuous noise pollution affecting both residential dwellings and disrupting farm operations.
- **Air Quality Degradation:** Continuous dust generation from mining operations will directly impact our crop quality, particularly our sensitive citrus and macadamia trees which require clean air for optimal photosynthesis and fruit development.
- **Tree Health Deterioration:** Mining dust will coat leaf surfaces of our macadamia and citrus trees, blocking stomata and reducing photosynthetic efficiency, leading to stressed trees, reduced yields, and potential tree mortality. Studies of the affect of dust with tree crops are readily available.
- **Stomatal Blockage:** Dust particles will block the stomata, tiny pores on leaves through which plants exchange gases like carbon dioxide and oxygen, disrupting carbon dioxide absorption essential for photosynthesis and impairing oxygen release essential for plant growth.
- **Photosynthesis Impairment:** Dust settling on leaves impacts their function, impeding photosynthesis, light interception, nutrient availability, gas-energy exchange, and causing physical damage to leaf surfaces.
- **Transpiration Disruption:** Dust deposition results in stomata clogging, which decreases the rate of carbon dioxide exchange, carbon assimilation, transpiration, and therefore net photosynthesis
- **Road Infrastructure Damage:** Increased heavy vehicle traffic will severely damage our gravel road infrastructure, creating safety hazards and additional maintenance costs.

### 3. ECONOMIC AND RESIDENTIAL IMPACT

- **Investment Depreciation:** Our substantial 2022 capital investment in establishing 100 hectares of mixed macadamia and citrus orchards faces significant depreciation due to adjacent industrial mining activities.
- **Crop Quality Degradation:** Continuous dust contamination from 24/6 mining operations will directly impact fruit quality and marketability of our premium agricultural products, with dust particles adhering to fruit surfaces and affecting export quality standards.
- **Long-term Tree Health Impact:** Persistent dust accumulation on macadamia and citrus tree foliage will compromise tree health through reduced photosynthesis, decreased carbon assimilation, impaired transpiration, increased susceptibility to pests and diseases, and potential long-term productivity decline requiring costly tree replacement.
- **Agricultural Productivity Loss:** The dust interference in normal photosynthetic processes will cause visible injury symptoms and generally decreased productivity across our entire 100-hectare orchard development.
- **Property Value Destruction:** The visual impact and industrial nature of adjacent mining operations will severely diminish our property values and residential amenity.
- **Increased Operational Costs:** Additional measures will be required to protect crops from mining-related contamination, water treatment, and road maintenance due to heavy mining traffic.
- **Residential Disruption:** Continuous 24/6 noise from mining operations will make our residential dwellings uninhabitable, affecting our ability to manage farm operations.

### 4. ENVIRONMENTAL AUTHORITY OPPOSITION AND WETLAND PROTECTION

- **Cape Nature Opposition:** Cape Nature, the chief custodian of the Western Cape's natural environment and governed by the Western Cape Nature Conservation Board, has NOT SUPPORTED the current application, indicating significant environmental concerns.
- **Critical Wetland Proximity:** The proposed mining site is located adjacent to the highly sensitive Goukou/Kruis River palmiet peat wetland, a critical ecosystem that requires substantial buffer zones for protection.
- **Water Table Threats:** Any future mining operations (should this progress beyond prospecting) risk operating below the water table, potentially causing irreversible damage to the sensitive wetland system.
- **Ecosystem Connectivity:** Our agricultural operations form part of the broader ecosystem that connects to and supports the Goukou/Kruis River wetland system.

### 5. AVAILABILITY OF ALTERNATIVE SITES WITH LOWER ENVIRONMENTAL IMPACT

- **Common Regional Resource:** Bentonite is a common geological resource in the broader Western Cape region, indicating that alternative prospecting sites are readily available.
- **Site Selection Inadequacy:** The applicant has failed to demonstrate why this particular site adjacent

to sensitive wetlands and established agricultural operations is necessary when less environmentally damaging alternatives exist.

- **Principle of Environmental Avoidance:** Environmental best practice requires selecting sites that avoid or minimize impacts on sensitive ecosystems, agricultural operations, and residential areas.
- **Alternative Sites Assessment Missing:** No evidence has been provided that alternative bentonite deposits in less sensitive areas have been considered or evaluated.

## 6. SERIOUS HEALTH THREATS TO MY FAMILY AND FARM WORKERS

- **Direct Family Safety Risk:** The Milos Island, Greece study (Addendum B, attached) provides definitive scientific evidence that communities living near bentonite mining operations face significantly elevated health risks, including allergic rhinitis, pneumonia, COPD, bronchiectasis, and asthma - putting my family's health in immediate and ongoing danger.
- **Farm Worker Occupational Health Crisis:** My agricultural workers, who spend extended periods outdoors on our adjacent property, face severe occupational health risks from continuous exposure to bentonite dust, as documented in peer-reviewed medical research.
- **Children and Elderly at Extreme Risk:** Scientific evidence shows that elderly individuals living within two kilometres of mines suffer higher rates of chronic respiratory diseases, while children are particularly vulnerable to respiratory damage from mining dust exposure - both demographics present in our household and workforce.
- **24/7 Exposure Creates Unprecedented Risk:** Unlike the Milos Island study subjects, my family and workers will face continuous 24/6 dust exposure with no respite periods, potentially creating health impacts even more severe than those scientifically documented in Greece.
- **Respiratory Disease Certainty:** Aerosolized bentonite particles cause pneumoconiosis and silicosis, with silicosis leading to pulmonary carcinoma - this is not a possibility but a documented medical certainty that threatens my family's lives and my workers' livelihoods.
- **Oxidative Cellular Damage:** Mining dust exposure causes oxidative damage of biomolecules, directly linked to cancer, respiratory, neurodegenerative and digestive disorders - subjecting my family and employees to proven cellular-level health destruction.

## 7. CONSTITUTIONAL RIGHTS VIOLATION AND DUTY OF CARE

- **Constitutional Right to Health:** The documented health risks from the Milos Island study demonstrate that approving this application would violate our constitutional right to health and a safe environment under Section 24 of the South African Constitution
- **Duty of Care Breach:** IMERYS and the DMRE have a legal duty of care to protect adjacent residents from foreseeable harm - the Milos Island scientific evidence makes health damage entirely foreseeable and preventable
- **Informed Consent Violation:** My family and workers cannot provide informed consent to health risks we never agreed to assume, particularly when safer alternative bentonite sites exist in the

region

## 8. LANDOWNER OPPOSITION TO MINING ON HIS OWN PROPERTY

- **Property Owner Objects:** Mr. Gert Janse van Rensburg, the owner of Wegwyzers Rivier RE/582 where the prospecting is proposed, is opposed to the mining activities on his own farm.
- **Landowner Rights Ignored:** Despite the landowner's objection to mining on his property, IMERYS continues to pursue prospecting rights without the property owner's support.
- **Community Unity Against Mining:** The opposition includes both the affected landowner and adjacent property owners, demonstrating unified community resistance to this inappropriate site selection.
- **Widespread Farmer Opposition:** A petition signed by multiple farmers in the area demonstrates broad agricultural community opposition to this mining application, reflecting collective concerns about environmental and agricultural impacts.
- **Local Knowledge and Concerns:** The property owner's opposition reflects intimate knowledge of local environmental sensitivities and agricultural importance that IMERYS has failed to adequately consider.

## 9. FUTILITY OF PROSPECTING GIVEN INEVITABLE MINING IMPACTS

- **Prospecting as Gateway to Mining:** While this application is for prospecting rights, the clear intention is to progress to full mining operations if viable deposits are confirmed - making prospecting the first step toward inevitable environmental destruction
- **Wasteful Use of Resources:** If the documented health risks, environmental damage, wetland threats, and agricultural destruction make mining operations clearly unacceptable at this location, approving prospecting wastes both public and private resources on a venture that should never proceed to mining.
- **Precautionary Principle:** Environmental law requires applying the precautionary principle - when mining impacts are so clearly severe and alternatives exist, prospecting should be refused to prevent future environmental damage.
- **Regulatory Inefficiency:** Approving prospecting now only to refuse mining later due to the same environmental and health concerns represents poor regulatory planning and wasteful administrative process.
- **Community Disruption:** Even prospecting activities will cause community anxiety, property value impacts, and preliminary environmental disturbance for a project that cannot proceed to mining due to overwhelming negative impacts.
- **False Hope and Investment:** Approving prospecting gives IMERYS false encouragement to invest in a site where mining will never be environmentally or socially acceptable.
- **Community Impact Assessment:** Approving the prospecting application encourages the belief that the general community petitioning the application have no impact on the decision making process.

- **Mitigation measures:** Applicants mitigate potential negative impacts with phrases like “dust suppression” which is very difficult to implement 24/7. See image below of the applicants plant in Heidelberg showing dust hanging over the facility.



*Figure 1 Applicants plant in Heidelberg showing dust above facility*

- **Visual Impact Assessment:** Approving the prospecting application will have a short term visual impact, but if mining rights are approved the visual impact will be for a much longer period. Approving the mining application will permanently destroy the agricultural landscape and rural character and forward thinking needs to be applied. Below the viewshed analysis of the prospecting phase and the mining phase if the application is approved. The areas in red is the areas that will have a negative visual impact.

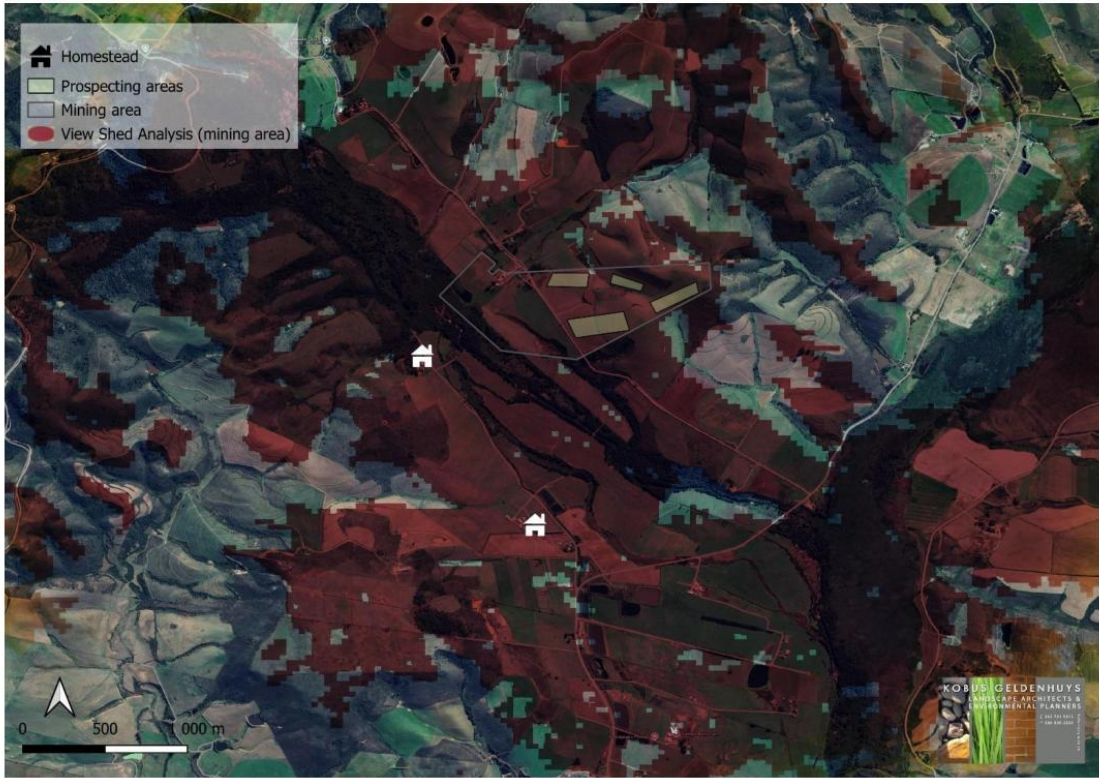


Figure 2 Viewshed analysis of mining phase

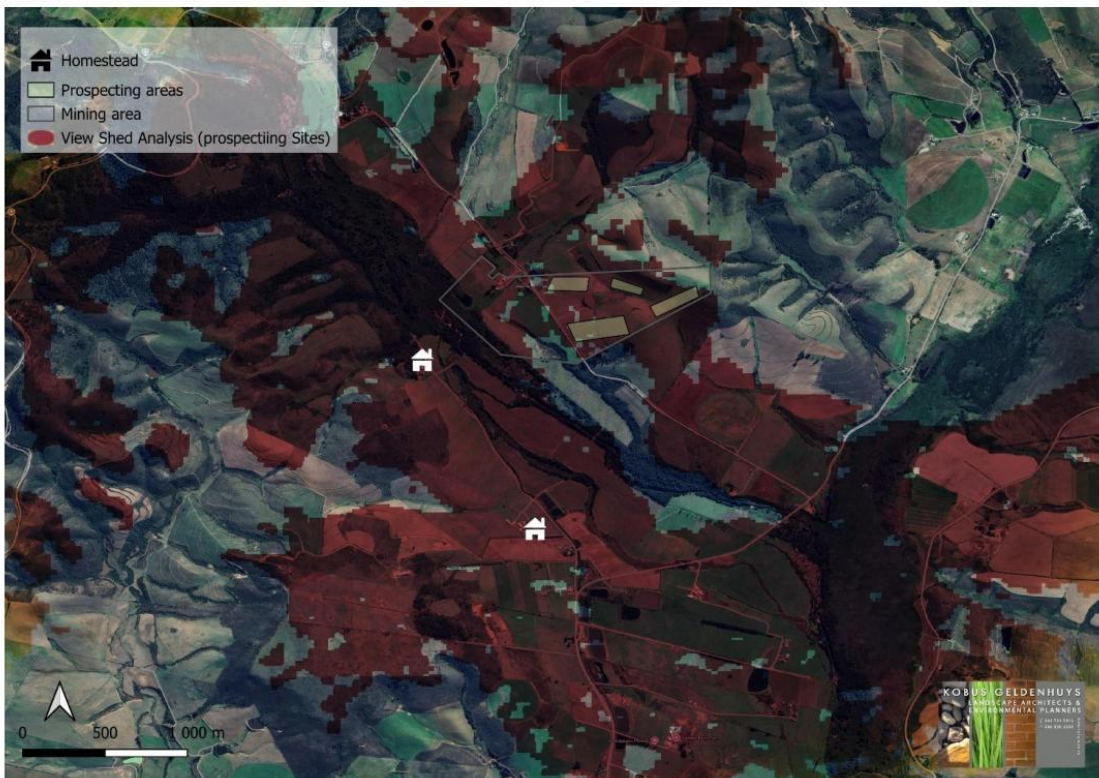


Figure 3 Viewshed analysis of prospecting phase

---

## LEGAL BASIS FOR OPPOSITION

Under the Mineral and Petroleum Resources Development Act (MPRDA) and the National Environmental Management Act (NEMA), interested and affected parties have the right to:

- Be consulted during the application process
- Receive copies of applications upon request
- Submit objections and representations
- Have their concerns considered in the decision-making process

**Significantly, CapeNature's opposition to this application demonstrates that the environmental risks are substantial and have been recognized by the provincial conservation authority responsible for protecting the Western Cape's natural heritage.**

---

## REQUESTED RELIEF

I respectfully request that the Department of Mineral Resources and Energy:

1. **REFUSE** the prospecting right application by Imerys Refractory Minerals South Africa (Pty) Ltd and require them to identify alternative sites with lower environmental and social impact
2. **REQUIRE** a comprehensive alternatives assessment demonstrating why other bentonite deposits in less sensitive areas cannot be utilized instead
3. **REQUIRE** a comprehensive health impact assessment and environmental impact assessment specifically addressing cross-boundary effects including respiratory health risks, water runoff, visual impact, noise pollution from 24/7 operations, road infrastructure damage, and impacts on the adjacent Goukou/Kruis River palmiet peat wetland
4. **MANDATE** meaningful consultation with all affected parties, including the property owner (Mr. Gert Janse van Rensburg) and adjacent agricultural operators
5. **ESTABLISH** substantial buffer zones around the sensitive Goukou/Kruis River palmiet peat wetland, noise controls, water runoff management systems, and road use agreements to protect adjacent agricultural and residential operations
6. **PROHIBIT** any future mining activities below the water table to protect the integrity of the sensitive wetland ecosystem
7. **CONSIDER** the cumulative impact on the broader agricultural community as evidenced by the farmer petition, food security implications, and the critical Goukou/Kruis River wetland ecosystem

8. **RESPECT** CapeNature's opposition to this application and their expertise in environmental conservation
  9. **APPLY** the precautionary principle by refusing prospecting when mining impacts are clearly unacceptable, preventing wasteful expenditure of resources on a project that cannot proceed due to environmental and health constraints
- 

## SUPPORTING DOCUMENTATION

Please find attached:

- **ADDENDUM A:** Petition from local farmers opposing the mining application
- **ADDENDUM B:** Peer-reviewed health impact studies from other bentonite mining operations (Milos Island, Greece study)
- CapeNature's objection to the previous application

**From:** Michael Hanson [<mailto:mhanson@capenature.co.za>]

**Sent:** 14 January 2025 07:02 PM **To:** [hauyoon@afrikom.co.za](mailto:hauyoon@afrikom.co.za)

**Cc:** [niekierust@gmail.com](mailto:niekierust@gmail.com) **Subject:** Re: Duineveld query: Status of Mining Applications in Riversdale

Rhett Smart To: Michael Hanson

1. BAR/EMPr: Prospecting for Bentonite and Zeolite on the Remainder of Farm Wegweyzers Rivier 582, Riversdale;

EAP: Enviro-EAP (Pty) Ltd

Pre-Application Draft Basic Assessment Report and Environmental Management Programme Report: closing date 17 September 2024

Did not support the current application. Located adjacent to the highly sensitive Goukou/Kruis River palmiet peat wetland. Need a substantial buffer and to ensure that future mining (if progresses past prospecting) is not below water table

**Michael Hanson**  
**Conservation Officer | Off Reserve – Riversdale**  
**Conservation Operations**  
**t 087 087 3877 082 448 9116**



- Photographic evidence of current agricultural operations and dwelling unit sight lines to mining site

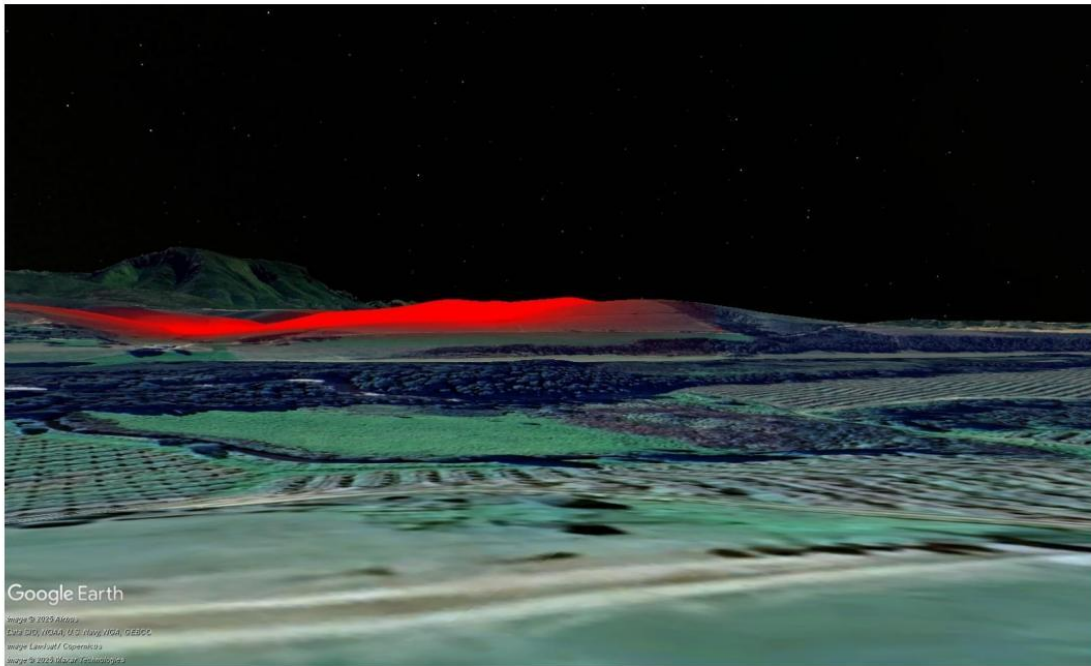


Figure 4 View from Homestead 01 (area in red shows prospecting and demarcated mining area)

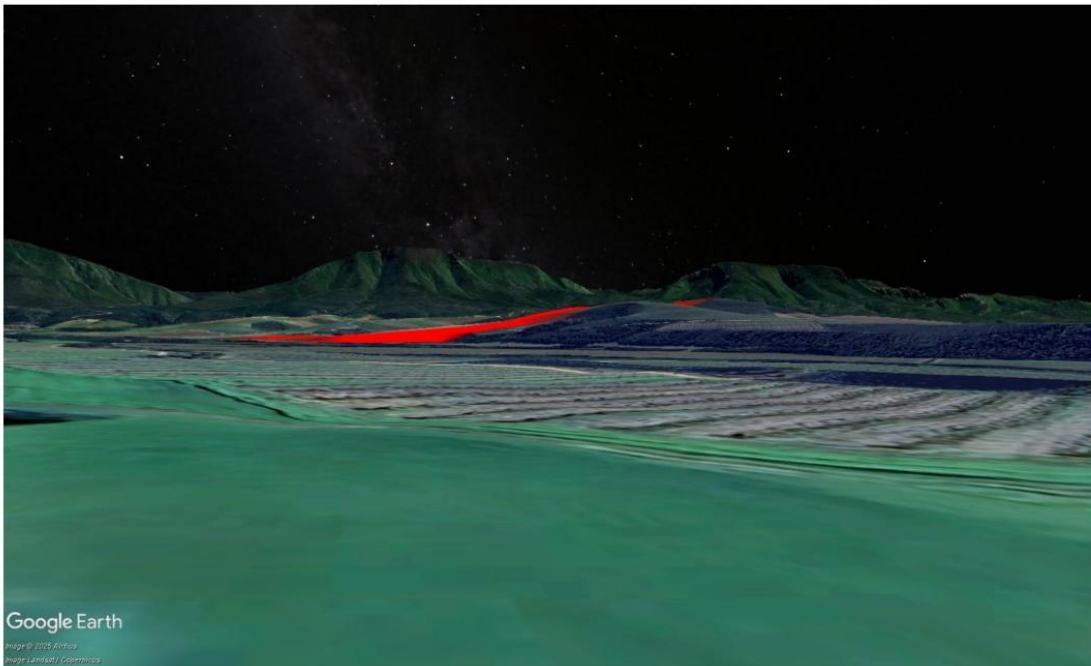


Figure 5 View from Homestead 02 (area in red shows prospecting and demarcated mining area)

## DOCUMENTATION REQUESTED FROM APPLICANT

Please provide us with the following documentation:

- Health impact assessment reports addressing respiratory disease risks from bentonite dust exposure to both humans and trees.
  - Environmental impact assessment reports addressing runoff, noise, dust, visual impacts, and wetland protection
  - Traffic impact assessment for gravel road infrastructure
- 

## CONCLUSION

The proposed 24/7 mining operations on the adjacent property present an immediate and severe threat to my family's health, my workers' safety, our established agricultural operations, residential amenity, and substantial development investments. The Milos Island scientific evidence proves that approving this application will cause documented health harm to my family and employees, while the serious health risks from bentonite dust exposure, including pneumoconiosis, silicosis, and potential carcinogenic effects, combined with cross-boundary environmental impacts have not been adequately considered or mitigated.

When bentonite is readily available at alternative sites throughout the Western Cape region, when the actual property owner (Mr. Gert Janse van Rensburg) opposes mining on his own land, when multiple local farmers have signed a petition opposing this application, and when CapeNature - the region's chief environmental custodian - has formally opposed this application due to the sensitive Goukou/Kruis River palmiet peat wetland proximity, there is no justification for approving an application that will

cause scientifically documented harm to human health, destroy established agricultural operations, and threaten one of South Africa's most sensitive ecosystems.

I trust that the DMRE will give due consideration to these scientifically proven health threats to my family and workers, legitimate environmental concerns, and refuse the application in the interest of human health protection, sustainable land use, and agricultural preservation.

**Yours faithfully,**



**Date:** 29 September 2025

---

**CC:**




- Imerys Refractory Minerals South Africa (Pty) Ltd t/a Cape Bentonite Mine
- Mr. Gert Janse van Rensburg (Property Owner, Wegwyzers Rivier RE/582)
- CapeNature (Western Cape Nature Conservation Board)
- Local Municipality
- Provincial Department of Agriculture
- Department of Health (Western Cape)
- Agricultural Union/Association (if applicable)

**ADDENDUM A: Petition**

**PETISIE**

BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBDRYWIGHEDDE  
OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS  
WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7  
VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL – WES KAAP PROVINSIE

DATUM: 2/10/2024

NAAM VAN BESWAARMAKER	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	
PLAAS NAAM EN TITELAKTE NOMMERS	Portion 39, Aan de Kruisrivier nr 113
BOERDERYBEDRYWIGHEDDE	Beeste, perde, skape
HOEVEELHEID WERKNEMERS	4



TIPE PLAAS AKTIWITEITE	
	Boerdery
REDES VIR BESWAAR	
	Onnodige ontwrugting in
	Ons gemeenskap, paaie is
	nie gebou vir swaar voert-
	uie nie
	Uitlok van misdad in ons
	veilige omgewing.

**PETISIE**

**BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBEDRYWIGHEDDE  
OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS  
WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7  
VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL – WES KAAP PROVINSIE**

DATUM: \_\_\_\_\_

02.10.2024

NAAM VAN BESWAARMAKER	
	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	C06400000000011300011
	C06400000000011300013
PLAAS NAAM EN TITELAKTE NOMMERS	Aan De Kruis Rivier 11/113
	Aan De Kruis Rivier 13/113
BOERDERYBEDRYWIGHEDDE	Pasture regeneration
	Grazing cattle & Horses
	Accomodation
HOEVEELHEID WERKNEMERS	4

TIPE PLAAS AKTIWITEITE	Free range Egg production
	Dexter stud
	Equine retirement Livery yard
	Agri-tourism
	Healing Retreat
	Animal Sanctuary
REDES VIR BESWAAR	1. Noise pollution - my farm is a
	sanctuary for animals and humans.
	2. Air pollution - my mother and
	one worker suffer from asthma
	which will be impacted by fine dust
	particles from the mining activity.
	3. Damage to roads - our roads are
	already under pressure from simple
	farm bakkies, tractors & trailers,
	they are certainly NOT developed to
withstand the onslaught of heavy	
trucks. Many heavy trucks multiple	
times a day!	

# VOLMAG

Ek, die ondergetekende,



In my hoedigheid as eienaar van die volgende eiendom:

\_\_\_\_\_A\_a\_n\_D\_e\_K\_r\_u\_i\_s\_R\_i\_v\_i\_e\_r\_11/113\_\_\_\_\_

\_\_\_\_\_A\_a\_n\_D\_e\_K\_r\_u\_i\_s\_R\_i\_v\_i\_e\_r\_13/113\_\_\_\_\_

Gehou kragtes Transportakte nr. T\_\_\_\_\_

nomineer en stel hiermee aan:



om my wettige prokureur en agent te wees in die volgende aangeleentheid:

Beswaar teen Voorgestelde Bentoniet- en Zeolietmyn-aktiwiteite op die volgende eiendomme geleë te Riversdal (VERW: WC30/5/1/2/2/10180MR):

- Gedeelte 7 van die plaas Kruisrivier nr 206;
- Restant van Gedeelte 1 van die plaas Wegwyzersrivier nr 114;
- Gedeelte 14 van die plaas Wegwyzersrivier nr 114;
- Restant van plaas nr 621;
- Plaas Zeekoekruis nr 651;
- Plaas Wegwyzersrivier RE/582.

En om alle dokumentasie te teken en in die algemeen alles te doen wat ookal nodig mag wees vir die doeleindes soos hierbo uiteengesit, welke handeling ookal hiermee bekragtig word.


Aldus gedoen en verly te \_\_\_\_\_R\_i\_v\_e\_r\_s\_d\_a\_l\_e\_o\_p\_\_\_\_\_O\_c\_t\_o\_b\_e\_r\_\_\_\_\_2024

in die teenwoordigheid van die ondergemelde getuies.

As Getuies



**PETISIE**  
**BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBDRYWIGHED**  
**OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS**  
**WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7**  
**VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL – WES KAAP PROVINSIE**  
 DATUM: \_\_\_\_\_

NAAM VAN BESWAARMAKER	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	
PLAAS NAAM EN TITELAKTE NOMMERS	FAIRY BIRD
	<del>ETBIO</del> T005096/23
BOERDERYBEDRYWIGHED	PERA SKOOL
	ADVOKAATSE PRAKTYK
	CHANGE MANAGEMENT CONSULT.
HOEVEELHEID WERKNEMERS	5

TIPE PLAAS AKTIWITEITE	PERDE
	INFRASTRUKTUR ONTWIKKELING
REDES VIR BESWAAR	1 GERAS VAN VRAGMOTORS
	SAL WERK VANAF ETENDE
	ONMOONTLIK MAAK
	2 STOF - 1) SAL WERK VAN
	PERDE IN KAMP
	ONMOONTLIK MAAK
	2) DRINKWATER IS
	NET DAKWATER EN
	SAL ONMOONTLIK WERK
	OM TE GEBEUK
	3 NATUURLIKE WATERBRONNE
	SAL BESODEEL WORD
	4 PAAIE SAL VERNTETIG
WORD	

5 GEEU IENKIE IS GEDEE  
VAN VERVOER ROETES  
NIE.

# VOLMAG

Ek, die ondergetekende,



In my hoedigheid as eienaar van die volgende eiendom:

GEDEELTE 10 + 11 Vd PLAAS AAN DE KRUIS  
RIVIER NO 113

Gehou kragtes Transportakte nr. T 005096/23

nomineer en stel hiermee aan:



irs

om my wettige prokureur en agent te wees in die volgende aangeleentheid:

**Beswaar teen Voorgestelde Bentoniet- en Zeolietmyn-aktiwiteite op die volgende eiendomme geleë te Riversdal (VERW: WC30/5/1/2/2/10180MR):**

- Gedeelte 7 van die plaas Kruisrivier nr 206;
- Restant van Gedeelte 1 van die plaas Wegwyzersrivier nr 114;
- Gedeelte 14 van die plaas Wegwyzersrivier nr 114;
- Restant van plaas nr 621;
- Plaas Zeekoekruis nr 651;
- Plaas Wegwyzersrivier RE/582.

En om alle dokumentasie te teken en in die algemeen alles te doen wat ookal nodig mag wees vir die doeleindes soos hierbo uiteengesit, welke handeling ookal hiermee bekragtig word.


Aldus gedoen en verly te RIVERSDAL op 2 Oktober 2024  
in die teenwoordigheid van die ondergemelde getuies.



**PETISIE**

BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBDRYWIGHED  
OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS  
WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7  
VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL - WES KAAP PROVINSIE

DATUM: 2 Oktober 2024

NAAM VAN BESWAARMAKER	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	
PLAAS NAAM EN TITELAKTE NOMMERS	Plaas Langulei (1/116)
	Riversdal
	T 34234 / 1989
BOERDERYBEDRYWIGHED	Beesboerdery
	vrugteboom
	Groente
HOEVEELHEID WERKNEMERS	2 werkers

TIPPE PLAAS AKTIWITEITE	Beesboerdery
	Vrugteboome
	Groente
REDES VIR BESWAAR	• Veiligheid
	• Toestand van Paaie
	• Geraas en stof
	• Verwoesting van natuur en natuurstoan
	• Besoedeling van water
	• Gesondheid van Bentoniet stof in lug
	• Swak laagwater brûe wat nie swaar lories se gewig sal kan hanteer nie



**PETISIE**

**BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBEDRYWIGHEDA  
OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS  
WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7  
VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL – WES KAAP PROVINSIE**

DATUM: \_\_\_\_\_

NAAM VAN BESWAARMAKER	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	
PLAAS NAAM EN TITELAKTE NOMMERS	LANGVLEI (GEDEELTE 1
	VAN 116) RIVERSDAL
	T34234/1989
BOERDERYBEDRYWIGHEDA	BEES BOERDERY
	GROENTE
	VRUGTE BOME
HOEEVELHEID WERKNEMERS	2

TIPE PLAAS AKTIWITEITE	REES BOERDERY
	GROENTE
	VRUGTEBOME
REDES VIR BESWAAR	STOF
	GERAAG
	MASSA FERTS DRAER
	VRAGMOTORS OP SWAK
	GROND PAAIE
	SWAK LAAGWATER
	BRUK WAT NIE DIE
	MYN VERKEER EN
	GEWICH KAN HANTEER
	NIE.
	VEILIGHEID. <del>WAT NIE DIE</del>

## VOLMAG

Ek, die ondergetekende,



PA PLAAS LANGVLEI (GEDEELTE 1 VAN 116)  
RIVERSDAL

Gehou kragtes Transportakte nr. T 34 234 / 1989

nomineer en stel hiermee aan:



om my wettige prokureur en agent te wees in die volgende aangeleentheid:

**Beswaar teen Voorgestelde Bentoniet- en Zeolietmyn-aktiwiteite op die volgende eiendomme geleë te Riversdal (VERW: WC30/5/1/2/2/10180MR):**

- Gedeelte 7 van die plaas Kruisrivier nr 206;
- Restant van Gedeelte 1 van die plaas Wegwyzersrivier nr 114;
- Gedeelte 14 van die plaas Wegwyzersrivier nr 114;
- Restant van plaas nr 621;
- Plaas Zeekoekruis nr 651;
- Plaas Wegwyzersrivier RE/582.

En om alle dokumentasie te teken en in die algemeen alles te doen wat ookal nodig mag wees vir die doeleindes soos hierbo uiteengesit, welke handeling ookal hiermee bekragtig word.

Aldus gedoen en verly te RIVERSDAL op 1-10 - 2024  
in die teenwoordigheid van die ondergemelde getuies.



**PETISIE**

**BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBDRYWIGHED  
 OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS  
 WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7  
 VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL – WES KAAP PROVINSIE**

DATUM: 2 October 2024

NAAM VAN BESWAARMAKER	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	Friends of the Earth CC Registration No. 1989/033468/23
PLAAS NAAM EN TITELAKTE NOMMERS	Remainder of Portion 4 of the Farm Aan De Kruis Rivier No. 113 Held by Deed of Transfer No. T71956/1989
BOERDERYBEDRYWIGHED	Unspecified
HOEVEELHEID WERKNEMERS	N/A

TIPE PLAAS AKTIWITEITE	
	Unspecified
REDES VIR BESWAAR	
	Refer to attached previous submission made by
	Friends of the Earth CC

## VOLMAG

Ek, die ondergetekende,



In my hoedigheid as eienaar van die volgende eiendom:

The Remainder of Portion 4 of the Farm Aan De Kruis Rivier No 113, in the Hessequa Municipality, Division Riversdale, Western Cape Province in extent: 72,9713 (Seventy-Two Comma Nine Seven One Three) Hectares

Gehou kragtes Transportakte nr. T71956/1989

nomineer en stel hiermee aan:



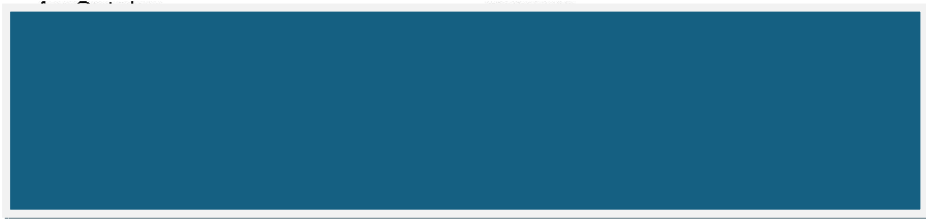
om my wettige prokureur en agent te wees in die volgende aangeleentheid:

**Beswaar teen Voorgestelde Bentoniet- en Zeolietmyn-aktiwiteite op die volgende eiendomme geleë te Riversdal (VERW: WC30/5/1/2/2/10180MR):**

- Gedeelte 7 van die plaas Kruisrivier nr 206;
- Restant van Gedeelte 1 van die plaas Wegwyzersrivier nr 114;
- Gedeelte 14 van die plaas Wegwyzersrivier nr 114;
- Restant van plaas nr 621;
- Plaas Zeekoekruis nr 651;
- Plaas Wegwyzersrivier RE/582.

En om alle dokumentasie te teken en in die algemeen alles te doen wat ookal nodig mag wees vir die doeleindes soos hierbo uiteengesit, welke handeling ookal hiermee bekragtig word.

Aldus gedoen en verly te Cape Town op 2 October 2024 in die teenwoordigheid van die ondergemelde getuies.



24 May 2024

**Att: Johmandie Pienaar****Enviro-EAP****Re: COMMENTS ON DRAFT SCOPING REPORT FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM Zeekoekruis 651 – WESTERN CAPE (DMR REFERENCE NUMBER WC30/5/1/2/2/10180MR****Please also refer to Annexure A and B attached hereto:****Overview**

- I/We would like to raise our concerns about the proposed mining and related draft scoping report for bentonite and zeolite on the farm Zeekoekruis 651 near Riversdale, Western Cape.
- I/We question in general the accuracy, adequacy and validity of the information and the completeness of assessments provided in the draft scoping report.
- There are several inconsistencies, omissions, errors and misleading statements in the draft scoping report which will need to be addressed in order to satisfy the legal requirements for such a project.
- The rehabilitation plan is not specific enough to provide assurances that the land will be rehabilitated to its original state to ensure future food security.
- Wider environmental impacts are understated and requires further detailed assessments.
- Socio-economic benefits are overstated and short lived and would not benefit the community in long run.
- Objection is raised to the potential negative impacts on the environment and the community in the short, medium and long term.
- The proposed mining project would also cause significant and irreversible damage to the natural and social environment such as:
  - impact on protected areas, vegetations and wetlands
  - soil erosion,
  - water contamination,
  - dust pollution and potential long term health impacts,
  - noise and general disturbance,
  - visual degradation of the area,
  - loss of agricultural land,
  - increased traffic and degradation of roads,

- o negative impact on the value of farmland, lifestyle farms and general property prices due to the undesired mining activity
- The socio-economic benefits of the proposed mining project are overstated, uncertain and short-term, and it would not outweigh the environmental costs and risks.

For the reasons listed above, I/We DO NOT agree with the Plan of Study for EIA. In summary, we believe that this project has more risks than benefits based on the various concerns raised in this document as well as the impact on our constitutional rights. The only reasonable option is to stop any further development.

## Annexure A

### ADDITIONAL COMMENTS ON DRAFT SCOPING REPORT FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM Zeekoekruis 651 – WESTERN CAPE (DMR REFERENCE NUMBER WC30/5/1/2/2/10180MR

#### 1.1 Agriculture Impact Assessment

- a. The Screening Tool Report identifies agriculture theme sensitivity as high for the following reasons:
  - *Annual Crop Cultivation/ Planted Pastures Rotation; Land capability; 06. Low-Moderate/07. Low- Moderate/08. Moderate*
  - *Annual Crop Cultivation/ Planted Pastures Rotation; Land capability; 01.Very Low/02. Very Low/03. Low-Very low/04. Low-Very low/05. Low*
- b. The presence of annual crop cultivation rotated with pasture is confirmed in the site sensitivity verification report, which means that the sensitivity for the agricultural theme remains high. The agricultural Statement has incorrectly rated these areas a medium agricultural sensitivity. Sensitivity is not the same as impact significance. **A SACNASP registered ecologist is not allowed to undertake either an agricultural impact assessment or compliance statement.**
- c. It should be noted that the entire proposed mining area falls within an area that is classified as a Protected Agricultural Area (PAA)<sup>1</sup>. A PAA is a demarcated area in which the climate, terrain, and soil are generally conducive for agricultural production and which, historically, or in a regional context, has made important contributions to the production of the various crops that are grown across South Africa. Within PAAs, the protection, particularly of arable land, is considered a priority for the protection of food security in South Africa.
- d. The impact on agriculture would be greater than what is identified in the draft scoping report, since the mining would cut access to sections of land off or would make small portions of land not viable for cultivation. The temporary loss of land would therefore be greater than what is reported on.
- e. The scoping report's assessment of the agricultural impact implies that agriculture would continue as before after rehabilitation of the land. This statement is queried, since the report does not address the productivity of the land after rehabilitation. Productivity is affected by the entire soil form, drainage, slope and level of compaction. None of these characteristics are addressed either in the agricultural compliance statement or in the draft scoping report to show how soil fertility after rehabilitation would be the same as before mining. The EMP refers to the requirement to remove and replace a 30cm topsoil layer and a 30 cm subsoil layer. The stockpiles, however, do not distinguish between these soil layers, which would become mixed if

stockpiled together. Furthermore, the protection of stockpiles and height of stockpiles are not specified. Erosion of the stockpiles, leaching of nutrients from the soil or loss of soil biota due to suffocation or high heat in the stockpiles are not addressed.

- f. A high degree of rehabilitation management is required throughout the process. It can easily happen that long-term agricultural potential of the land is forever compromised. The process for rehabilitation is not sufficiently addressed and requires a detailed process to be laid out to ensure future food security.

As a minimum the following would need to be included, specified and described in detail in the EMPr.

- The topography and surface must be sufficiently smoothed without steep excavation edges to allow for cultivation – how is this achieved?
- Topsoil should be spread on the surface to the same depth as the measured and recorded pre-mining topsoil depth – how this is achieved?
- No saline material from depth within the mining excavation occurs at less than 50 cm depth in the rehabilitated soil profile – how is this achieved?
- Correctly and well implemented double stripping – how is this achieved?
- No non-free-draining depressions across the surface and that the depth of mining has not created an effective sub-surface dam, that is lower than the low point for drainage out of the mining area – how is this achieved?
- Pre-mining contour banks have been re-established to suitable specifications (height, slope, distance apart) at least as intensive as prior to disturbance, and that the integrity of the contour bank system as a whole is in place – how is this achieved?
- There should be no visible erosion across the area, or down-slope of it because of mining, and that no part of the area has been left unacceptably vulnerable to erosion – how is this achieved?
- Soil chemistry, including pH, salinity, and phosphorus levels have been optimised for small grain production – how is this achieved?
- A cover crop has been established and grows successfully across the entire area which was disturbed by mining activities – how is this achieved?

For the reasons listed above, **we/I DO NOT** agree with the Plan of Study for EIA.

## 1.2 Aquatic Biodiversity Impact Assessment

The Screening Tool Report identifies the aquatic biodiversity theme sensitivity as Very high for the following reasons: CBA 1 Aquatic; Valley Bottom Wetlands.

The specialist, registered with SACNASP as a candidate aquatic scientist, have included in his Compliance Statement the identification of FEPA wetlands in the study area, which confirms the very high sensitivity for the aquatic biodiversity theme. **In terms of law, this requires an impact assessment.** The potential impacts of alteration of the beds and banks of the rivers and alteration and pollution of stormwater is completely undervalued

in both the Aquatic Biodiversity Compliance Statement and the draft Scoping Report, especially since the farm road crossing the wetland would not be able to carry heavy mining traffic and would need improvement.

The disturbance of Wetlands in an Aquatic Critically Biodiverse Area where a mine is located next to a water course is of great concern and not appropriately addressed.

For the reasons listed above, **we/I DO NOT** agree with the Plan of Study for EIA.

### **1.3 Terrestrial Plant Species and Terrestrial Biodiversity Impact Assessment**

The terrestrial plant species theme is rated with a medium sensitivity and terrestrial biodiversity with a very high sensitivity in the online Screening Tool Report.

The site sensitivity verification report confirms the presence of Swellendam Silcrete Fynbos on the property but draws the site area small to exclude the vegetation remnants that is actually situated in the study area. The vegetated drainage lines would potentially be impacted on since they would be used for access.

It is recognised that the listed sensitive plant species or biodiversity may not be directly impacted, but the nature of the proposed mining activity is such that an impact buffer area should be included, as recommended in the Species Environmental Assessment Guideline.

The reference in the Plan of Study for EIA to an "impact statement" for biodiversity or plant species is misleading since the relevant regulations do not make reference to an impact statement. **A Specialist Assessment will need to be undertaken.**

For the reasons listed above, **we/I DO NOT** agree with the Plan of Study for EIA.

### **1.4 Animal Species Assessment**

The Screening Tool Report identifies the animal species theme with a high sensitivity, with *Neotis denhami* being one of the species of high sensitivity. This species often utilises agricultural land in the Riversdale area. The animal species compliance statement and draft scoping report are therefore misleading, since an avifauna specialist did not get the opportunity to investigate the study area for the presence of this or any of the other sensitive birds. Many owl species are also present on Riversdale farms and surrounding areas and could be negatively impacted.

The area is also well known for cape leopard, caracal, honey badger, aardvark, cape fox, bushbuck, cape grysbok, porcupine, numerous snake species and other smaller species. The study is devoid of any impact assessment that such industrial development will have on the various species in the short, medium and long term. Especially when you consider the cumulative negative impact of multiple mining locations around Riversdale and surrounding areas on animal species. The impact on species and their ecosystem is not limited to the mining areas but also the increased activity of industrial equipment and large vehicles on roads.

A specialist assessment will need to be undertaken.

For the reasons listed above, **we/I DO NOT** agree with the Plan of Study for EIA

### **1.5 Impact of Increased traffic**

The statement of the impact on increased traffic in the draft scoping report is very vague. The numbers of trucks and/or equipment trips per day and the weight thereof is not specified to inform the impact. The statement is made that the traffic is similar to agriculture traffic. This is questionable, since heavy transport does not use the farm roads(which are mere tracks) on a daily basis. No mention is made of the condition of these roads and whether they are suitable to carry the required traffic, especially the road through the wetlands.

The potential impact of increased heavy transport trips on the Kruisrivier road, adjacent to which are sensitive receptors (a dairy and a school) are situated is not being addressed, as the traffic impact assessment is limited to on-site traffic. Furthermore, this road becomes very hazardous in wet weather and would worsen to the point that these roads would be inaccessible to other landowners in the area.

The potential mining site's increased truck traffic through the Riversdale town is also overlooked. The town's entry and exit points are already stressed and more trucks on the road will further deteriorate the road conditions and traffic flow of the Riversdale town.

Considering the existing mining operations in the area that also use the Vetterivier road, owners of neighbouring farms are extremely dissatisfied with the impact of mining activities. +/- 70 trucks per day on this road have disrupted their daily lives to the extent that their quality of life is impacted.

Transportation routes are not listed on notices and affected parties along routes were not notified of the expected increased traffic.

A much more detailed impact assessment will need to be conducted on the impact of the increased traffic and the overall degradation of roads and quality of life.

For the reasons listed above, **we/I DO NOT** agree with the Plan of Study for EIA

### **1.6 Potential of bentonite Toxicity**

We also raise further concern regarding the potential toxicity of Bentonite mining.

It is widely reported that some Bentonite may contain variable amounts of crystalline silica, a recognised human carcinogen. Crystalline silica dusts have been extensively studied and it is well-established that prolonged exposure leads to silicosis, lung cancer and autoimmune diseases in humans.

Because the Bentonite Mining will be based on open mining, dust will be released into the environment as well as when trucks are transporting this material to the processing plant. This could pose a health hazard to the people living in the vicinity of the mine as well as along the transport routes.

Proof that the carcinogenic material is not present in the proposed bentonite mining operation will need to be provided to ensure that negative impact on human life does not occur. A detailed explanation of the testing process would need to be defined and assurances provided.

For the reasons listed above, **we/I DO NOT** agree with the Plan of Study for EIA

## Annexure B

### Comments on DRAFT SCOPING REPORT FOR LISTED ACTIVITIES ASSOCIATED WITH BENTONITE AND ZEOLITE MINING ACTIVITIES ON FARM ZEEKOEKRUIS 651 NEAR RIVERSDAL - WESTERN CAPE WC30/5/1/2/2/10180MR

For the reasons listed below, we/I OBJECT to the proposed listed activities associated with Bentonite and Zeolite mining activities on the farm Zeekoekruis 651:

#### **Draft Scoping Report**

Pg 6 of 80 – Site Infrastructure and Equipment

- Reference the statement made that “*no infrastructure apart from a chemical toilet and waste bin*”. In all likelihood an operation with earthmoving and light vehicles (including 2 x excavators, 4 x 16T trucks, 2 x dozers, 1 x 30T truck, 2 x loaders) management and labour (totalling approximately 54 people) would require semi-permanent vehicle workshop / maintenance, office and tea / messing infrastructure. Document later refers to concrete area for dealing with earthmoving equipment with hydrocarbon leaks. Also, emergency oil spill kits which would need to be contained / stored on site. The original statement is therefore inaccurate and misleading to the public / reader.

Pg 7 of 80 – Site Operation

- Mining method – insufficient information / definition of what their ‘in-house’ mining method is.
- Mining method – insufficient information on how many dump trucks per operating cycle (presumably per day?)
- Mining method – ‘relatively shallow’ – information indicate an overall ‘quarry’ depth of 30m (that’s a 10 storey building ‘height’ for reference), which would then need between 8-10 off 20m wide x 3-4m benches. Excluding the bentonite seam width itself, that could equate to a +- 400m wide quarry (4 x rugby field lengths) if benched on both sides of the bentonite seam. That is a substantial scar on the landscape and not an insignificant operation. Even half that is substantial.
- Mining method – mentions topsoil and overburden are removed and stockpiled- no mention of the plan for vegetation / tress / shrubs, etc removal and how are these disposed of? No detailed plans to prevent stockpiled topsoil and overburden from erosion and run-off into other areas / watercourses, etc?
- Mining Method – no definition of overburden stripping process incl. number of earthmoving equipment, and separately defined mining operation incl. number of earthmoving equipment, dump trucks / highway trucks number and cycles per day.
- Mining method – ‘*rehabilitation takes place as mining progresses*’ – further information required on mine planning including stripping, mining, haul roads in active ‘quarry’ and haul roads to enable ongoing rehabilitation. Without the relevant detail this will in all likelihood not be the way it is done and an “attempt” to rehabilitate will be made on completion of mining operations.
- Mining method – ‘*contouring of backfilled area to prevent erosion*’ – rehabilitation plan does not including vegetation planting to prevent erosion of topsoil. Contours alone will not prevent soil erosion. Also, detail around water penetration profiles, the destination

of the [contaminated] surface run-off water, and ongoing plans for erosion management whilst the new vegetation is being established is lacking.

Pg 11 of 80 – (f) need and desirability if the proposed activities

- Imerys has “*existing mining rights for several properties directly adjacent to the proposed mining property*” – evidence of this is required if used as a motivation for the need and desirability of proposed new operation. Without actual approved mining rights for adjacent properties, this statement is misleading and could directly impact a decision to grant further licenses.
- “*viable sources of bentonite and zeolite are expected to be located on the areas proposed for mining...*” – expected?? Concerning that should a license be approved this is done on “expected” presence of bentonite. Proof of prospecting and presence of bentonite required. Further in “Location alternatives” it suggests that “non-invasive site investigations” were done – what drilling was conducted to prove there is a resource?
- 54 local persons employed (the Mining Works Programme - Appendix D contains inconsistent numbers) – no confirmation that the required professionally qualified and experienced specialists and mid-management, the skilled technician and the semi-skilled and discretionary decision making non-permanent employees are available locally and therefore won’t attract additional people from out of town. Note too that the majority of positions (semi-skilled) are classified as “non-permanent”. The social labour plan contains a number of inconsistencies with the report.
- Mining operation for +5 years – if rehabilitation is left to the end of the mining, which is most often the case, this 5 years would extend with further negative impacts.

Pg 12 of 80 – (h) Description of the process followed to reach the proposed preferred alternatives within the site Layout alternatives

- “**Layout alternatives** – *Layout alternatives will be considered and assessed by the specialists. The proposed layout will be informed by specialist’s recommendations and will aim to avoid any sensitive environmental features i.e. indigenous vegetation areas, watercourses etc.*” - Concerning that mining layout is subject to change.
- *The No-Go Option – “Seeing that all potential impacts as identified and assessed is expected to be mitigated to an acceptable level without causing significant detrimental harm to the natural and social environment the socio-economic benefits of the proposed bentonite mining will outweigh the potential negative impacts on the environment if specialist and EMP recommendations are effectively implemented.”* – This is a concerning (and unsubstantiated) statement - On this point alone the objection to the proposed mining operations should be upheld.

Pg 13 of 80 – Public Meetings and Workshops

- No evidence of prior public meetings held to engage the public in a meaningful way. Process of “informing” the public is severely lacking.

Pg 22 of 80 – Socio-Economic Characteristics

Mention of population of Hessequa Municipality jurisdiction and references population of circa 53,000 – using Hessequa Municipality numbers (9 wards including but not limited to Heidelberg, Riversdale, Witsand, Stillbay, Malgas, Gouritz, Albertinia) is misleading when considering the socio-economic characterization in relation to the proposed mining operation. The socio-economic characterization should consider only the local Riversdale town.

Pg 27 of 80 – Land Use Character of Surrounding Area

- Low density residential is not included although neighbouring farms owners and labour may / probably do live on their farms.
- Schools – schools are in close proximity to proposed operation site and road used between mine site and processing site.

If the above are not directly neighbouring the propose mine site, they would be affected by routing heavy truck traffic and associated negative environmental aspects (dust, pollution, noise, etc).

Pg 28 of 80 – Groundwater, soil and geological stability of the site

- Seasonally wet soils – indicated “NO”, however this is challenged based on the high rainfall area this proposed mine location is in.
- Soils with high clay content – indicated “NO” however this is questionable, not least of which because Bentonite is a clay
- An area adjacent to or above an aquifer – this needs to be confirmed. Considering the area has a lot of water (above and below ground) based on springs and fountains throughout the area the risk for contamination is very high.

Pg 29 of 80 – Surface Water

- No mention of the canal / scheme water that is present on the East edge of the property and along the road which will be used.
- Although mining activities are apparently “not proposed on or within any of the surface water features” the vehicular traffic in and out of the direct mining area will be.

Pg 29 of 80 – Biodiversity

- Table is meant to “highlight biodiversity planning categories of all areas on site” and then specifies NNR (no natural area remaining). This is not accurate as clearly the farm (other areas on site) has areas which are not completely transformed cultivated agricultural lands. Table on Pg 30 of 80 which states 100% Transformed is also misleading.
- Table with Terrestrial Ecosystems / Aquatic Ecosystems – information doesn’t appear accurate.

Pg 31 of 80 – (v) Impacts and risks identified.

- +- 75Ha mentioned here however it’s only meant to be +- 45Ha

**Potential Impacts on Geographical and Physical Aspects**

- Increased dust levels risks
  - statement that “excavation and material hauling may create an increase in dust levels and when topsoil is removed there may be an increase in windblown dust...” – Justification that this will be no more significant than the potential dust created from agricultural is not accurate. The continual nature of the mining and hauling operation will create significantly more dust nuisance.
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Erosion risks

- Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
- Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Emissions risks
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Sediment loads in water resources risks
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Impact on ground water resources, etc
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Trapping of storm water within excavations and the mine area risks
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Hydrocarbon spill risks
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
  - Note mention of repair of leaks in 'concreted workshop' – this suggests more permanent infrastructure on the mine site which was not previously listed.
- Fire risks
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
  - Causes of fire in a mining operation are numerous and these are not individually accessed in terms of their risk likelihood and severity.
- Impact on naturally occurring fauna and avifauna risks
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
  - Rehabilitation plan lacks detail to support the mitigation to "rehabilitate the area after mining process is complete to its pre-mining state".
- Impact on terrestrial indigenous vegetation areas risks

- Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
- Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.

#### **Potential Impacts on Socio-Economic Aspects**

- Sustained Jobs
  - This “opportunity” is overstated. Impossible to ensure that jobs are given to existing local communities / people and not people coming into the town due to potential job opportunities.
  - Along with incoming labour will come increases in pressure on existing infrastructure, housing, crime, etc
  - The 54 people initially employed will in all likelihood not remain employed for the duration of the operation due to being dismissed or leaving for other reasons. This will lead to a far greater number of incoming people looking for employment / being employed (potentially as much as 3 times as many) over the life of the operation. Once people have established themselves in a town they may not leave even if they no longer work for the mine.
  - Additionally, a conservative 3:1 ratio of dependants coming along with mine employed workers would lead to a potential 4 fold increase in pressure on existing infrastructure, housing, crime, etc
- Increased traffic risks
  - Mention of existing mining operations for several years on adjacent farms to be substantiated.
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
- Mining of agricultural land risks
  - The impact on only 10Ha of affected agricultural land does not consider the impact of the entire operation (+-45Ha)
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.

#### **Potential Impacts of Noise**

- Noise due to mining machinery, trucks and people on site risks
  - Impacts of noise will extend beyond just the mining site and will include the roads between the mining and processing operations.
  - Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
  - No mention of hours of operation and the noise nuisance associated with operations during weekdays, weekends, holidays, nights?

#### **Potential Visual Impacts**

- Negative visual impact due to creation of excavation pits risks

- o Visual impacts extend beyond the excavation pit – for e.g. roads, trucks, dust on adjacent land, infrastructure on site, stockpiled material, etc
- o Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
- o Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.

#### **Decommissioning / closure / Rehabilitation impacts**

- Soil erosion risks
  - o Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.
  - o Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.
  - o Rehabilitation plan lacking
- Loss of socio-economic benefits risk
  - o Having to source additional bentonite deposits to mine to ensure sustainable operations is a complete manipulation of the process of identifying and mitigating risks in a systematic and rational way.

#### **Page 49 of 80 – Risk Register**

The identification, analysis, scoring and mitigations for the proposed mining operations, are severely lacking in providing a true representation of the risks and significant impacts an operation as proposed would have on the site, neighbouring and nearby farms, the infrastructure local to the mine and between the mine and processing facility, town infrastructure and the community.

Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.

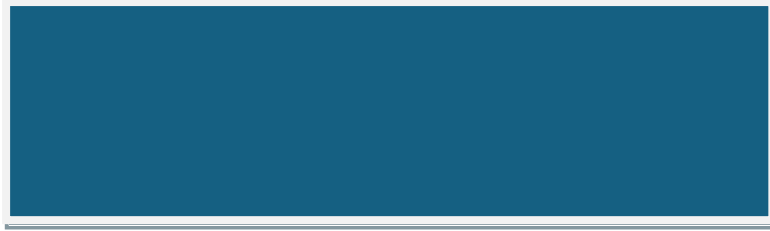
Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.

#### **Page 50 / 51 of 80 – Risk Management**

Whilst ISO provides a standard for Risk Management, the actual implementation of risk assessment (and management) for this proposed mining operation, including the identification, analysis, scoring and mitigations for the proposed mining operations, are severely lacking in providing a true representation of the risks and significant impacts an operation as proposed would have on the site, neighbouring and nearby farms, the infrastructure local to the mine and between the mine and processing facility, town infrastructure and the community.

Mitigation measures are weak and, in some instances, unsubstantiated in terms of how well / if at all they will mitigate the issue.

Risk ratings (without / with mitigation) are unsubstantiated and debatable in terms of severity and likelihood.



Place: Riversdale

Date: 24 May 2024




Place: Somerset West

Date: 24 May 2024

**PETISIE**  
**BESWAAR TEEN VOORGESTELDE BENTONIET EN SEOLIET MYNBEDRYWIGHEDE**  
**OP PLAAS ZEEKOEKRUIS 651 & PLAAS WEGWYSERS RIVIER RE/582, PLAAS**  
**WEGWYSERS RIVIER GEDEELTE 1 & 14 VAN 114, PLAAS KRUISRIVIER GEDEELTE 7**  
**VAN 206, PLAAS RESTANT VAN 621 BUIE RIVERSDAL – WES KAAP PROVINSIE**

DATUM: 02/10/2024

NAAM VAN BESWAARMAKER	
HANDTEKENING EN VOLLE NAME VAN PERSOON WAT TEKEN	
ID OF PLAAS REGISTRASIE NOMMER	
PLAAS NAAM EN TITELAKTE NOMMERS	
BOERDERYBEDRYWIGHEDE	SUIWEL + VLEISBEES BOERDERY
	GENAS VERBOUING
HOEVEELHEID WERKNEMERS	41

TIPE PLAAS AKTIWITEITE	MELK VAN BEESTE
	PLANT VAN GEWASSE
	MAAK VAN KUILVOER
	BESPROEING VANUIT GOUKOU
	RIVIER
REDES VIR BESWAAR	1. Besoedeling van Goukou rivier en ekosisteem
	2. Verwoesting van Provinsiale grondpad wat reeds nie instand gehou word nie.
	3. Besoedeling van gewasse en weidings agr stof.
	4. Die gevaar vir publiek van abnormale hoeveelhede swaar voertuie wat dorp binnegaan vanuit distrik.
	6. Die algemene gesondheid onder mense en diere agr stof.
	7. Vernietiging van Inheemse plante.
	8. Vernietiging van huidige landskap

# VOLMAG

Ek, die ondergetekende,



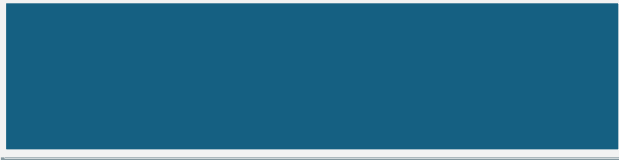
In my hoedigheid as eienaar van die volgende eiendom:

BAKENSKOP

(Sien lys aangeheg)

Gehou kragtes Transportakte nr. T \_\_\_\_\_

nomineer en stel hiermee aan:



om my wettige prokureur en agent te wees in die volgende aangeleentheid:

Beswaar teen Voorgestelde Bentoniet- en Zeolietmyn-aktiwiteite op die volgende eiendomme geleë te Riversdal (VERW: WC30/5/1/2/2/10180MR):

- Gedeelte 7 van die plaas Kruisrivier nr 206;
- Restant van Gedeelte 1 van die plaas Wegwyzersrivier nr 114;
- Gedeelte 14 van die plaas Wegwyzersrivier nr 114;
- Restant van plaas nr 621;
- Plaas Zeekoekruis nr 651;
- Plaas Wegwyzersrivier RE/582.

En om alle dokumentasie te teken en in die algemeen alles te doen wat ookal nodig mag wees vir die doeleindes soos hierbo uiteengesit, welke handeling ookal hiermee bekragtig word.

Aldus gedoen en verly te RIVERSDAL op 02 | 10 | 2024  
in die teenwoordigheid van die ondergemelde getuies.



**BAKENSKOP BOERDERY****PLAAS NAAM EN TITEL AKTE NRS**

<b>GEDEELTE</b>	<b>BESKRYWING</b>
1/213	KLEIN PALMIET RIVIER
9/213	MORKEL
15/213	KLEIN PALMIET RIVIER
RE/216	PLAAS 216
2/216	PLAAS 216
6/213	KLEIN PALMIET RIVIER
RE/217	DE ZOETMELKS
3/217	DE ZOETMELKS
219	PLAAS 219
1/218	PLAAS 219
19/213	KLEIN PALMIET RIVIER
26/213	KLEIN PALMIET RIVIER
RE/20/213	KLEIN PALMIET RIVIER
21/213	KLEIN PALMIET RIVIER
31/213	KLEIN PALMIET RIVIER
587	BAKENSKOP
30/213	KLEIN PALMIET RIVIER
8/278	PLATTE KOP

# ADDENDUM B: Respiratory Disease Related Mortality and Morbidity on an Island of Greece exposed to Perlite and Bentonite Mining Dust

*Int. J. Environ. Res. Public Health* **2013**, *10*, 4982–4995; doi:10.3390/ijerph10104982

OPEN ACCESS

International Journal of  
**Environmental Research and  
Public Health**  
ISSN 1660-4601  
www.mdpi.com/journal/ijerph

Article

## Respiratory Disease Related Mortality and Morbidity on an Island of Greece Exposed to Perlite and Bentonite Mining Dust

Stefanos Sampatakakis <sup>1,\*</sup>, Athena Linos <sup>2,3</sup>, Eleni Papadimitriou <sup>2</sup>, Athanasios Petralias <sup>2,3,4</sup>, Archontoula Dalma <sup>2,3</sup>, Eirini Saranti Papasaranti <sup>2</sup>, Eleni Christoforidou <sup>2</sup> and Melina Stoltidis <sup>2</sup>

<sup>1</sup> Hellenic Center for Disease Control and Prevention (HCDCP), 3-5 Agrafon street, Athens 15235, Greece

<sup>2</sup> Department of Hygiene, Epidemiology and Medical Statistics, Medical School, National and Kapodistrian University of Athens, 75 Mikras Asias street, Athens 11527, Greece; E-Mails: a.linos@prolepsis.gr (A.L.); e.papad@yahoo.gr (E.P.); a.petralias@prolepsis.gr (A.P.); n.dalma@prolepsis.gr (A.D.); irene.sarant@gmail.com (E.S.P.); echristof@med.uoa.gr (E.C.); mstoltdi@gmail.com (M.S.)

<sup>3</sup> Institute of Preventive Medicine, Environmental & Occupational Health, Prolepsis, 7 Fragoklisias street, Athens 15125, Greece

<sup>4</sup> Department of Statistics, Athens University of Economics and Business, 76 Patision street, Athens 10434, Greece

\* Author to whom correspondence should be addressed; E-Mail: stefanos.sampatakakis@gmail.com; Tel.: +30-210-521-2891; Fax: +30-210-521-2839.

Received: 29 August 2013; in revised form: 30 September 2013 / Accepted: 1 October 2013 /

Published: 14 October 2013

---

**Abstract:** A morbidity and mortality study took place, focused on Milos Island, where perlite and bentonite mining sites are located. Official data concerning number and cause of deaths, regarding specific respiratory diseases and the total of respiratory diseases, for both Milos Island and the Cyclades Prefecture were used. Standardized Mortality Ratios (SMRs) were computed, adjusted specifically for age, gender and calendar year. Tests of linear trend were performed. By means of a predefined questionnaire, the morbidity rates of specific respiratory diseases in Milos, were compared to those of the municipality of Oinofita, an industrial region. Chi-square analysis was used and the confounding factors of age, gender and smoking were taken into account, by estimating binary logistic regression models. The SMRs for Pneumonia and Chronic Obstructive Pulmonary Disease (COPD)

were found elevated for both genders, although they did not reach statistical significance. For the total of respiratory diseases, a statistically significant SMR was identified regarding the decade 1989–1998. The morbidity study revealed elevated and statistically significant Odds Ratios (ORs), associated with allergic rhinitis, pneumonia, COPD and bronchiectasis. An elevated OR was also identified for asthma. After controlling for age, gender and smoking, the ORs were statistically significant and towards the same direction.

**Keywords:** chronic obstructive pulmonary disease; respiratory; perlite; bentonite; mining dust

---

## 1. Introduction

The adverse effect of mining dust on the respiratory status of mining site workers, especially coal miners and the workers exposed to silica and asbestos, has been up to date adequately studied, both in developed and developing countries [1–3]. It is a common knowledge that construction workers—especially those exposed to silica containing dust—and workers in mining sites are at an increased risk of developing pneumoconiosis [4,5]. As far as workers exposed to silica and cumulative respirable dust are concerned, a significant increase in Chronic Obstructive Pulmonary Disease (COPD) independent of smoking, has been observed [6,7].

International agencies concerned about the health and safety of workers, recognize as hazardous materials regarding respiratory health, apart from crystalline quartz and asbestos, other non-fibrous mineral dusts as well, which are classified as “nuisance” dusts, such as kaoline, bentonite and perlite. These may increase the risk for the exposed individuals to develop lung cancer and mesothelioma [8].

Perlite is an amorphous volcanic glass, composed of SiO<sub>2</sub> (71%–75%), Al<sub>2</sub>O<sub>3</sub> (12%–16%), Na<sub>2</sub>O (3%–4%), K<sub>2</sub>O (4%–5%), Fe<sub>2</sub>O<sub>3</sub> (0.5%–2%), MgO (0.2%–0.7%), CaO (0.5%–1.5%) and 2%–5% bound water. It originates from volcanic eruptions and it is typically formed by the hydration of obsidian. In order to be used for industrial purposes, perlite is heated at temperatures up to 1,000 degree Celsius, in order to become what is known as expanded perlite, which is characterized by low density, high surface area and low thermal conductivity. It is mainly used as a soil conditioner, packaging material, construction insulator for walls and floors, agriculture substrate and as a filter aid. Perlite is regarded as a generally safe material, and the time weighted average of threshold limit value (TLV-TWA) is 10 mg/m<sup>3</sup> without short-term exposure limit (American Conference of Government Industrial Hygienists) [9]. According to the International Federation of Chemical, Energy and General Workers’ Unions, the threshold limit value for perlite is 5 mg/m<sup>3</sup> [10].

Up to date, little literature evidence exists regarding perlite exposure effects on workers’ and populations’ morbidity—especially regarding their respiratory health and pulmonary function—and mortality. More specifically, according to Cooper [11], who conducted a study on workers occupied in perlite mining and processing factories and as a result, were exposed to perlite dust for up to 23 years, it was found that their exposure in perlite dust was around the official limits, and that there was no evidence of pneumoconiosis in 152 perlite workers by using chest radiography or pulmonary function tests [12]. On the other hand, about thirty years ago, an orchid grower exposed to perlite, developed pulmonary irritation and mild hemorrhage, as perlite crystals were found in the upper bronchi [13].

There are only two recent studies examining the effect of perlite dust on the respiratory health of exposed workers available. The first [14], took place in Turkey, where pulmonary function tests and chest radiograms were performed in 36 perlite exposed workers and 22 unexposed office workers in the same perlite industry plant twice, with an interval of four years. Respirable perlite dust levels exceeded the official limits in the processing area. In this study, the authors reached to the conclusion that although 12-year perlite exposure did not lead to decreased spirometric indices, a four-year decline in Transfer Function of the Lung for Carbon Monoxide ( $T_LCO$ ) was significant in perlite workers, which indicates a possible small airway obstruction. In the second study [15], followed 24 workers exposed to perlite in an industry located in Taiwan for 6 months, after an accidental explosion of a nitrogen tank, whose insulator consisted mainly of expanded perlite powder. The symptoms observed among the workers within the first 6 months were cough, eye irritation, shortness of breath and throat irritation. Moreover, three of them, during this period of time, showed obstruction of the PFT (Pulmonary Function Tests) and specifically predicted Forced Expiratory Volume in one second ( $FEV_1$ ) <80%. These three cases fulfill the term of Reactive Airway Dysfunction Syndrome (RADS).

Bentonite is a clay mineral, which contents silica in percentages which range from less than 1% to more than 20%. Up to date, several studies have shown that exposure—especially occupational—to silica, may be associated mainly with lung and kidney malignancies in workers [16,17]. Moreover, according to International Agency for Research on Cancer [18], the carcinogenicity of crystalline silica depends on the “inherent characteristics of the material”. Bentonite also contains mica, feldspar along with other minerals in different proportions. The use of bentonite is widely spread in chemical, pharmaceutical, cosmetic and food industry, civil, geotechnical and environmental engineering, agriculture and mining. Humans are exposed to bentonite through occupational and environmental pathways, mostly by the respiratory tract and dermal contact.

Up to date, few studies have described pulmonary fibrosis after workers' occupational exposure to bentonite dust [19,20]. Examining the potential mechanisms by which such a relationship may occur, a recent study, where the cytotoxic effect of bentonite particles was examined *in vitro* on human lung fibroblasts, it was found that the cytotoxic potential of bentonite may strongly be associated with the fibroblasts membrane lysis [21]. Furthermore, researchers found that bentonite particles may induce the cytotoxicity and oxidative stress, as well as genotoxicity in human lymphoblast B cells [22,23].

Milos (Cyclades, Greece) is an Aegean island, where perlite and bentonite mining sites are primarily located, and as a result, is one of the leading worldwide mining sites regarding these materials. We hypothesized that continuous exposure to perlite and bentonite dust would adversely affect Milos' permanent residents' respiratory health. Therefore, in order to examine the potential effects of elevated exposure to these materials contained in the suspended mining dust, we performed an epidemiological morbidity and mortality study in Milos Island. It should be noted that this is the first study where this type of association is examined, as well as the only study where a population of this size is permanently residing in an area where exposure in perlite and bentonite dust takes place.

## 2. Experimental Section

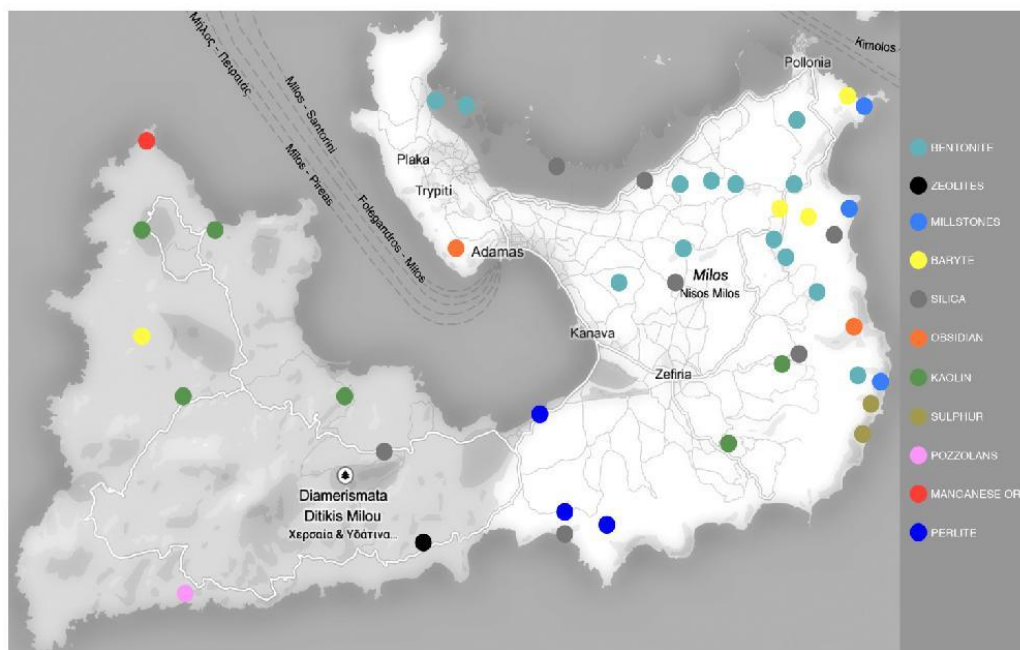
### 2.1. Study Area Location and Exposure

The mortality study was conducted in the island of Milos, which is located 140 km southeast of Athens. It is the 5th largest island of the Cyclades Prefecture (which includes 24 islands in the Aegean). The fact that makes Milos special, compared to the rest of the islands that form the Cyclades Prefecture, is that Milos is a product of volcanic activity which started some 2–3 million years ago and stopped 90,000 years ago. There are two inactive volcanos on the island. As a product of volcanic activity, the island of Milos is rich in natural mineral resources. The most significant ones can be listed as follows: bentonite, perlite, pozzolana and small quantities of caolin. One of the primary factors of Milos' economic growth is the mining of these mineral resources. Due to fact that perlite and bentonite have mined at Milos Island since the late 1950s, Greece has evolved into a leading country worldwide in the production of these minerals, producing yearly more than 1.15 million metric tons of perlite (crude and processed), with a maximum of 1.75 million metric tons in 2007, and more than 1.6 million metric tons of bentonite (crude and processed), with a maximum of 2.84 million metric tons in 2008 (yearly statistics of the Greek Mining Enterprises Association). There are more than 100 mining sites located in the island, 25 of which are active perlite and bentonite mines [24]. Most of them are found in the north-eastern part of the island, which constitutes Milos' main residential area (Figure 1). According to official land cover data of the Hellenic Statistical Authority, in 2000, 95.8% of the island of Milos was covered by shrubs, little or no vegetation associations and agricultural areas, while only 0.95% of the island was covered by urban fabric. However, mining sites covered a significant 3.2% of the island surface (5.4 out of 167.7 thousand acres). Note in this, that all these mines correspond to large surface sites and not underground sites.

The island of Milos, like the rest of the Cyclades Prefecture, experiences specific climatic conditions that refer to strong northern winds during July and August, also known as “Cycladic Meltemia”. Furthermore, in Milos, wind intensity is estimated to be rather high, i.e., more than 6 B (Beaufort) for at least a quarter of the year (Hellenic National Meteorological Service data). The particular climatic facts, combined to the wide surface covered by the perlite and bentonite mining sites, are likely to affect residents' exposure in perlite and bentonite dust.

The morbidity study was conducted in the island of Milos, along with the municipality of Oinofita. The municipality of Oinofita is located 50 km north of Athens, in the Voiotia Prefecture. The Oinofita area has evolved into an industrial region since the late 1970s and has seen increased scientific interest [25], because of the industrial waste produced by the large number of industries operating in the area (around 700 according to [26]). According to the registry of industries held by the Oinofita municipal office, the industrial zone of Oinofita hosts numerous types of industrial activity, such as chemical production, detergents, pesticides and pharmaceuticals, leather production, aluminium, food production and fodders.

**Figure 1.** Historical and modern mining locations of mineral products in Milos. Current production includes mining locations of bentonite and perlite.



It is clear that the two areas under study have significant differences, with respect to their geographical terrain and the risk factors that affect public health. In the island of Milos, the basic risk factor is associated with the mining dust, while in the Oinofita area with the air, ground and water pollution mainly caused by industrial waste. Although on one hand this factor increases the complexity of the study, on the other hand, it makes the analysis more interesting, mainly due to the fact that we have a chance to compare populations exposed to different risk factors, which both affect respiratory health and pulmonary function. In order to scan for potential differences in the characteristics of the two populations, the confounding factors of gender, age and smoking have been taken into account in the analysis.

## 2.2. Study Population

For the mortality study, the data used were provided by the Hellenic Statistical Authority. That data concerned the number and cause of deaths, stratified by gender, age (divided in 5 year groups) and calendar year, for both the island of Milos and the Cyclades prefecture. The authorities provided data for specific respiratory diseases (ICD9 range: 460–519) and lung cancer (ICD9 162) related deaths for the 11-year period 1999–2009, while for the total of respiratory diseases (ICD9 range: 460–519) related deaths, the provided data was for the 21-year period 1989–2009.

For the morbidity study, a predefined questionnaire was used, and a face to face interview took place for 269 persons residing in the island of Milos (with a total population of 4,771 people according to the 2001 census) during April 2011 and April 2012, along with 1,811 persons in the municipality of

Oinofita (with a total population of 8,195 according to the 2001 census) during the time period between January 2010 and April 2011. The criteria of eligibility for participating in the study were that the participants were permanent residents, thus exposed to the aforementioned health risk factors in both study areas. No exclusion criteria were used regarding age, gender or health status. For children under 15 years of age, the interviews were taken from their mothers.

### *2.3. Questionnaire*

The questionnaire employed, included demographic and socioeconomic characteristics, such as gender, age, place of birth, nationality, educational status, marital status, number of children and siblings and employment status. The questionnaire also included specific questions on participants' smoking habits, since smoking is the main confounding factor associated with respiratory disorders. The main part of the questionnaire was associated with participants' health status. More specifically, participants were asked if they have ever been diagnosed by a medical doctor with specific respiratory system diseases (ICD9 range: 460–519), as well as lung cancer (ICD9 162); each disease was asked separately.

### *2.4. Statistical Analysis*

In order to study the mortality due to respiratory diseases in the island of Milos, we calculated person years and observed deaths, stratified by gender, age (divided in 5 year groups), and calendar year. The expected number of deaths was calculated on the basis of the Cyclades Prefecture, to which the island of Milos belongs to. All related data for the mortality study were provided by the Hellenic Statistical Authority, thus the classification system used by the authority [27] is employed to classify the respiratory diseases. Standardized Mortality Ratios (SMRs) were computed, adjusted to age (in 5-year age groups), gender and calendar year, by dividing the observed number of deaths with the expected number of deaths (multiplied by 100). Confidence intervals of 95% and *p*-values were calculated for the SMRs on the basis of the exact Poisson method [28,29]. Tests of linear trend were performed, after computing SMRs (adjusted for age and gender) for each year of follow up.

For the morbidity study, we computed the percentage of people having specific respiratory diseases in the two areas (Milos and Oinofita) and performed Chi-square and Fisher exact tests. The Odds ratio (with the associated confidence interval) of Milos with respect to Oinofita was calculated for each disease. In order to account for the confounding factors of gender, age and smoking, we performed binary logistic regression for each respiratory disease, controlling for these factors. The statistical analysis was performed using the statistical software SPSS 17 (IBM, Athens, Greece).

### 3. Results and Discussion

#### 3.1. Results

##### 3.1.1. Mortality

The observed deaths, expected deaths, SMR's and corresponding *p*-values and confidence intervals comparing the island of Milos to the Cyclades Prefecture are presented in Table 1. In terms of total number of deaths in Milos, they are lower than expected, compared to the Cyclades Prefecture, although the difference is not statistically significant. As far as specific diseases of the respiratory system are concerned, the SMRs for Pneumonia (SMR = 128) and Chronic Obstructive Pulmonary Disease (COPD) (SMR = 160) are increased for both males and females, but do not achieve statistical significance. On the other hand, the SMR associated with lung cancer, appears to be lower and does not statistically differ with respect to that of the Cyclades Prefecture. Linear trend was not identified for the specific respiratory diseases during the 11-year period 1999–2009.

Data provided by the statistical authority with regards to deaths from the total of respiratory diseases (ICD9 range: 460–519) for the 21-year period 1989–2009, revealed the existence of a decreasing trend (*p*-value < 0.001) (Table 2). Interestingly enough, the SMR (CI) for the period 1989–1998 is equal to 211.9 (162.4–271.5) (and statistically significant for both males and females), while for the period 1999–2009 equal to 92.1 (64.8–126.9). As depicted in Figure 2, the yearly SMRs, with the exception of year 1995, are consistently higher during the period 1989–1998, as compared to the time period between 1999 and 2009.

##### 3.1.2. Morbidity

Table 3 depicts the morbidity results in Milos as compared to Oinofita. We observe that the Odds ratios associated with allergic rhinitis (OR = 2.37), pneumonia (OR = 5.97) and COPD (OR = 2.16) are elevated and remain statistically significant. The Odds Ratio (OR = 1.58) for asthma is of borderline significance (Fischer's *p*-value = 0.051). A significantly elevated Odds Ratio is found regarding bronchiectasis (OR = 13.56), but this is taken with caution, due to the small number of cases (two in Milos and one in Oinofita). Furthermore, it is of note that there were no reported cases of pneumoconiosis (ICD9 500–508) or pulmonary fibrosis (ICD9 515) in either Milos or at Oinofita.

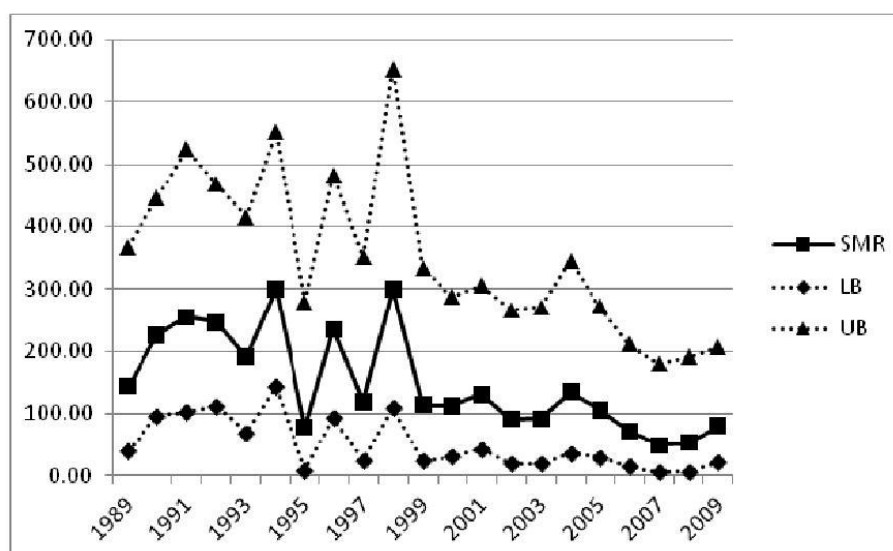
The mean age of the two populations (Milos 49.9, Oinofita 48.4) does not differ statistically (*p*-value = 0.260). In addition to that, there is no statistically significant difference with respect to gender (female are 49.4% in Milos and 46.9% in Oinofita). However, there is a statistical significant difference (*p*-value = 0.021) with respect to smoking. In Milos, the proportion of current smokers is 24.5% and that of ex-smokers equal to 29%; the other 46.5% never smoked. At Oinofita, the respective proportions are comparatively lower; that of current smokers equal to 26.3% and that of ex-smokers equal to 18.8%. After controlling for these factors via logistic regression, it is made obvious within the last rows of Table 3, that the Odds ratios of the above reported respiratory diseases are again statistically significant and towards the same direction.

**Table 1.** Mortality in Milos compared to Cyclades prefecture for specific respiratory diseases; years 1999–2009.

Disease	Total Deaths	Acute respiratory infections	Pneumonia	Chronic Obstructive pulmonary disease (COPD) and extrinsic allergic alveolitis	Pneumoconiosis	Other diseases of the respiratory system	Cancer of Lung, trachea and bronchus
<b>ICD9 range</b>		<b>460–462, 465</b>	<b>480–486</b>	<b>495, 496</b>	<b>500–508</b>	<b>488, 510, 512–519</b>	<b>162</b>
<b>Total</b>							
SMR (CI)	90.61 (83.00–98.73)	66.03 (30.19–125.35)	128.31 (41.66–299.43)	159.80 (87.36–268.11)	70.25 (1.78–391.40)	65.52 (28.29–129.10)	79.79 (51.63–117.78)
Observed deaths	521	9	5	14	1	8	25
Expected deaths	574.98	13.63	3.90	8.76	1.42	12.21	31.33
<i>p</i> -value	0.0239	0.2562	0.7020	0.1249	1.0000	0.2834	0.2954
Trend test ( <i>p</i> -value)	0.9706	0.8375	0.4737	0.6626		0.2032	0.9739
SMR 1999–2002 (CI)	89.07 (76.91–102.59)	35.94 (0.91–200.27)	139.21 (16.86–502.87)	202.19 (74.20–440.09)	0.00 (0.00–1578.18)	106.09 (38.93–230.92)	102.36 (51.10–183.15)
Obs. deaths 1999–2002	192	1	2	6	0	6	11
SMR 2003–2006 (CI)	91.74 (79.12–105.79)	79.22 (21.58–202.84)	173.88 (35.86–508.15)	173.82 (56.44–405.63)	258.76 (6.55–1441.73)	24.79 (0.63–138.14)	41.92 (13.61–97.83)
Obs. deaths 2003–2006	189	4	3	5	1	1	5
SMR 2007–2009 (CI)	91.28 (76.78–107.71)	68.98 (18.79–176.62)	0.00 (0.00–502.01)	102.85 (21.21–300.56)	0.00 (0.00–459.20)	39.66 (1.00–220.96)	103.92 (47.52–197.27)
Obs. deaths 2007–2009	140	4	0	3	0	1	9
<b>Male</b>							
SMR (CI)	92.00 (81.52–103.45)	80.61 (29.58–175.46)	122.12 (25.18–356.89)	166.58 (83.16–298.06)	0.00 (0.00–414.78)	123.96 (49.84–255.40)	80.75 (49.99–123.44)
Observed deaths	279	6	3	11	0	7	21
Expected deaths	303.26	7.44	2.46	6.60	0.89	5.65	26.00
<i>p</i> -value	0.1697	0.7720	0.8900	0.1455	0.8200	0.6744	0.3805
<b>Female</b>							
SMR (CI)	89.06 (78.20–101.02)	48.49 (10.00–141.70)	138.86 (16.82–501.63)	139.04 (28.67–406.33)	187.99 (4.76–1047.40)	15.24 (0.39–84.89)	75.06 (20.45–192.19)
Observed deaths	242	3	2	3	1	1	4
Expected deaths	271.72	6.19	1.44	2.16	0.53	6.56	5.33
<i>p</i> -value	0.0726	0.2705	0.8440	0.7318	0.8251	0.0213	0.7695

**Table 2.** Mortality in Milos compared to Cyclades prefecture for the total of respiratory diseases (ICD9 range: 460–519); years 1989–2009.

	Total	Male	Female
SMR (CI)	142.55 (115.85–173.54)	150.74 (115.03–194.03)	131.54 (93.54–179.83)
Observed deaths	99	60	39
Expected deaths	69.45	39.80	29.65
<i>p</i> -value	0.0010	0.0034	0.1135
Trend test ( <i>p</i> -value)	<0.0001	0.0056	0.0787
SMR 1989–1998 (CI)	211.81 (162.39–271.53)	199.65 (137.43–280.38)	227.58 (152.41–326.84)
Obs. deaths 1989–1999	62	33	29
SMR 1999–2009 (CI)	92.09 (64.84–126.93)	116.00 (76.45–168.78)	59.15 (28.37–108.79)
Obs. deaths 1999–2009	37	27	10

**Figure 2.** SMRs (with 95% CI) of Milos compared to Cyclades prefecture for the total of respiratory diseases (ICD9 range: 460–519); years 1989–2009.

### 3.2. Discussion

This epidemiological study is consisted of two parts, a mortality part and a morbidity part. According to the mortality study's results, the number of deaths during the predefined eleven-year period 1999–2009, was higher in the island of Milos regarding pneumonia and chronic obstructive pulmonary disease (COPD), in comparison to the expected number of deaths in Cyclades Prefecture for the same respiratory disorders (increased SMRs—not reaching statistical significance). The SMR for the total of respiratory diseases during the period 1989–1998 was elevated and statistically significant, whilst decreased in the following decade. We are not aware of any significant event occurring in the island (*i.e.*, changes in the active mining sites or the total production of bentonite or perlite), which could explain this trend. This decrease can be attributed to either an improvement in the mining-extraction procedures, or to an easier access to health system services.

**Table 3.** Respiratory disease related morbidity in Milos compared to Oinofita.

Disease	Allergic rhinitis	Pneumonia	Asthma	Bronchiectasis	Chronic obstructive pulmonary disease (COPD)	Respiratory failure	Cancer of Lung, trachea and bronchus
ICD9	477	480–486	493	494	496	518.81–518.84	162
Milos% (N = 269)	5.2 (14)	5.9 (16)	9.7 (26)	0.7 (2)	4.1 (11)	0.4 (1)	0.4 (1)
Oinofita% (N = 1,811)	2.3 (41)	1.0 (19)	6.4 (115)	0.1 (1)	1.9 (35)	0.4 (8)	0.3 (5)
Chi-square test ( <i>p</i> -value)	0.005	<0.001	0.044	0.006	0.025	0.870	0.785
Fischer's exact test ( <i>p</i> -value)	0.012	<0.001	0.051	0.046	0.041	1.000	0.565
OR (CI)	2.37 (1.27–4.41)	5.97 (3.03–11.75)	1.58 (1.01–2.47)	13.56 (1.23–150.04)	2.16 (1.09–4.31)	0.84 (0.11–6.75)	1.35 (0.16–11.58)
OR (CI) and <i>p</i> -value controlling for gender, age and smoking (logistic regression)	2.24 (1.20–4.19)	5.47 (2.73–10.97)	1.49 (0.95–2.34)	12.47 (1.09–143.05)	2.28 (1.11–4.66)	0.83 (0.10–6.74)	1.37 (0.16–11.99)
	0.011	<0.001	0.082	0.043	0.024	0.858	0.774

The morbidity part of the study was conducted in two industrial types of environment, the island of Milos (perlite and bentonite mining sites—ambient air polluted area) and the municipality of Oinofita (air, water and ground pollution—mostly due to industrial waste), areas with similar demographic characteristics. It was found that the prevalence of allergic rhinitis, pneumonia and COPD was higher on the island of Milos compared to the municipality of Oinofita, while a statistically significant association was observed. Similar were the results found for bronchiectasis, despite the small number of the observed cases, while regarding asthma, the difference was of borderline significance. We can therefore infer that factors related to the exposure to perlite and bentonite dust—Milos' permanent residents—may contribute to their respiratory health related mortality and morbidity higher rates.

To this day, there are only two recent studies where a relationship between exposure to perlite dust and respiratory health status is observed. Polatli *et al.* [14] who conducted a study on perlite workers exposed to low levels of perlite for more than 10 years and concluded to a four-year decline in Transfer Function of the Lung for Carbon Monoxide ( $T_LCO$ ), which reflects a small airway obstruction. Regarding the second study, Du *et al.* [15] followed 24 workers in an industry in Taiwan for 6 months, after an acute exposure to perlite dust, due to an accident which occurred at the industry where they worked. Within the first 6 months, the workers developed respiratory tract disorders such as cough, shortness of breath and throat irritation. Moreover, three of them, during this period of time, developed signs of Reactive Airway Dysfunction Syndrome (RADS) and performed a Forced Expiratory Volume in one second ( $FEV_1$ ) less than 80%. Both studies were conducted in working places. In the first one, the long term effects of exposure to perlite dust are being studied, while in the second one, its acute effects. In our study, a whole population is under study, based on their permanent residential area and not just their working place. Finally, in agreement with our findings, Cooper *et al.* [12,13] proved no relation between long term exposure to perlite dust and pneumoconiosis.

As far as bentonite is concerned, it should be noted that only one case of pneumoconiosis because of exposure to bentonite dust (sodium montmorillonite) has been described by Gibbs and Pooley [20], while in a previous study, Phibbs *et al.* [19] described silicosis in bentonite workers. No epidemiological study in general population is up to date available regarding both exposure to perlite and bentonite mining dust.

Our findings are supported by the fact that an existing recent study concluded to the fact that bentonite particles have a cytotoxic effect on human lung fibroblasts through their membrane lysis [21]. In addition to that, a previous study performed in guinea pigs by McMichael *et al.* [30] found that their exposure to high concentration of perlite dust can cause lymphoid aggregation and perivascular inflammatory response.

Our study is limited by the fact that we did not use data concerning the perlite and bentonite dust concentration in ambient air and their potential to exceed the officially set limits. Furthermore, occupational confounding factors were not taken into account in the analysis. Moreover, whether these effects on residents' respiratory health are due to bentonite and perlite dust separately, or if these dusts have a cumulative effect on the development of residents' respiratory disorders remains a question that could not be answered by our study.

This is the first epidemiological study where specific methodology is used to indicate bentonite's and perlite's dust role in the mortality and morbidity rate of permanent residents. Moreover, this is the

first study comparing a region (the island of Milos) exposed to mining dust, to an industrial residential area (the municipality of Oinofita) without such mining exposure. In the immediate future, we intend to conduct a study focused on other health disorders, such as eye irritation [15], which may be caused by exposure in perlite dust. Furthermore, our immediate intention is to conduct a similar type of morbidity study accompanied by a spirometry test performance on workers at bentonite and perlite mining sites, as well as elementary school children, in order to identify if their respiratory health may be affected by such a dust exposure.

#### 4. Conclusions

People—permanent residents of Milos island—exposed to perlite and bentonite mining dust, indicate an increased risk of developing diseases of the respiratory system, such as pneumonia, chronic obstructive pulmonary disease and allergic rhinitis. The morbidity for these diseases is elevated and statistically significant, while the mortality for pneumonia and chronic obstructive pulmonary disease is elevated, although non-statistically significant. More morbidity studies with detailed exposure data are needed, in order to examine the effects of different types of mining dust to exposed populations.

#### Acknowledgments

This research is financially supported by the Hellenic Center for Disease Control and Prevention (HCDCP).

#### Conflicts of Interest

The authors declare no conflict of interest.

#### References

1. Wang, X.R.; Christiani, D.C. Respiratory symptoms and functional status in workers exposed to silica, asbestos and coal mine dusts. *J. Occup. Environ. Med.* **2000**, *42*, 1076–1084.
2. Henneberger, P.K.; Attfield, M.D. Respiratory symptoms and spirometry in experienced coal miners: Effects of both distant and recent coal mine dust exposures. *Am. J. Ind. Med.* **1997**, *32*, 268–274.
3. Mamuya, S.H.D.; Bratveit, M.; Mashalla, Y.; Moen, B. High prevalence of respiratory symptoms among workers in the development section of a manually operated coal mine in a developing country: A cross sectional study. *BMC Public Health* **2007**, *7*, 17, doi:10.1186/1471-2458-7-17.
4. Suarathana, E.; Moons, K.G.M.; Heederik, D.; Meijer, E. A simple diagnostic model for ruling out pneumoconiosis among construction workers. *Occup. Environ. Med.* **2007**, *64*, 595–601.
5. Wang, X.; Yu, I.T.; Wong, T.W.; Yano, E. Respiratory symptoms and pulmonary function in coal miners: Looking into the effects of simple pneumoconiosis. *Am. J. Ind. Med.* **1999**, *35*, 124–131.
6. Hendrick, D.J. Occupation and chronic obstructive pulmonary disease (COPD). *Thorax* **1996**, *51*, 947–955.

7. Oxman, A.D.; Muir, D.C.; Shannon, H.S.; Stock, S.R.; Hnizdo, E.; Lange, H.J. Occupational dust exposure and chronic obstructive pulmonary disease. A systematic overview of the evidence. *Am. Rev. Respir. Dis.* **1993**, *148*, 38–48.
8. Elmes, P.C. Perlite and other “nuisance” dust. *J. R. Soc. Med.* **1987**, *80*, 403–404.
9. American Conference of Government Industrial Hygienists (ACGIH) 2005. *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment*, ACGIH: Cincinnati, OH, USA, 2005.
10. International Federation of Chemical, Energy and General Workers’ Unions (IFCEG). *Occupational Health Program. Threshold Limit Values*; IFCEG: Geneva, Switzerland, 1982, pp. 1–51.
11. Cooper, W.C. Radiograph survey of perlite workers. *J. Occup. Med.* **1975**, *17*, 304–307.
12. Cooper, W.C.; Sargent, E.N. Study of chest radiographs and pulmonary ventilator function in perlite workers. *J. Occup. Med.* **1986**, *28*, 199–206.
13. Cooper, W.C. Pulmonary function in perlite workers. *J. Occup. Med.* **1976**, *18*, 723–729.
14. Polatli, M.; Erdinc, M.; Erdinc, E.; Okyay, E. Perlite exposure and 4-year change in lung function. *Environ. Res. Sect.* **2001**, *86*, 238–243.
15. Du, C.L.; Wang, J.D.; Chu, P.C.; Guo, Y.L. Acute expanded perlite exposure with persistent reactive airway dysfunction syndrome. *Ind. Health* **2010**, *48*, 119–122.
16. McDonald, A.D.; McDonald, J.C.; Rando, R.J.; Hughes, J.M.; Weill, H. Cohort mortality study of North American industrial sand workers. I. Mortality from lung cancer, silicosis and other causes. *Am. Occup. Hyg.* **2001**, *45*, 193–199.
17. McDonald, J.C.; McDonald, A.D.; Hughes, J.M.; Rando, R.J.; Weill, H. Mortality from lung and kidney disease in a cohort of North American industrial sand workers: An update. *Am. Occup. Hyg.* **2005**, *49*, 367–373.
18. IARC Monographs on the Evaluation of Carcinogenic Risk to Humans, Silica, Some Silicates, Coal Dust and Para-Aramid Fibrils. Available online: <http://www.monographs.iarc.fr/ENG/Monographs/vol68/mono68.pdf> (accessed on 22 September 2013).
19. Phibbs, B.P.; Sundin, R.E.; Mitchell, R.S. Silicosis in Wyoming bentonite workers. *Am. Rev. Respir. Dis.* **1971**, *103*, 1–17.
20. Gibbs, A.R.; Pooley, F.D. Fuller’s earth (montmorillonite) pneumoconiosis. *Occup. Environ. Med.* **1994**, *51*, 644–646.
21. Geh, S.; Yücel, R.; Duffin, R.; Albrecht, C.; Borm, P.J.; Armbruster, L.; Raulf-Heimsoth, M.; Brüning, T.; Hoffmann, E.; Rettenmeier, A.W.; *et al.* Cellular uptake and cytotoxic potential of respirable bentonite particles with different quartz contents and chemical modifications in human lung fibroblasts. *Arch. Toxicol.* **2006**, *80*, 98–106.
22. Zhang, M.; Lu, Y.; Li, X.; Chen, Q.; Lu, L.; Xing, M.; Zou, H.; He, J. Studying the cytotoxicity and oxidative stress induced by two kinds of bentonite particles on human B lymphoblast cells *in vitro*. *Chem. Biol. Interact.* **2010**, *183*, 390–396.
23. Zhang, M.; Li, X.; Lu, Y.; Fang, X.; Chen, Q.; Xing, M.; He, J. Studying the genotoxic effects induced by two kinds of bentonite particles on human B lymphoblast cells *in vitro*. *Mutat. Res.* **2011**, *720*, 62–66.

24. Gaga Andromaxi. Study for the Sustainable Development in Milos. Dafni Network of Aegean Islands for Sustainability. Available online: <http://www.dafni.net.gr/gr/members/files/milos/milos-report.pdf> (accessed on 22 September 2013).
25. Linos, A.; Petralias, A.; Christophi, C.A.; Christoforidou, E.; Kouroutou, P.; Stoltidis, M.; Veloudaki, A.; Tzala, E.; Makris, K.C.; Karagas, M.R. Oral ingestion of hexavalent chromium through drinking water and cancer mortality in an industrial area of Greece-an ecological study. *Environ. Health* **2011**, *10*, 50, doi:10.1186/1476-069X-10-50.
26. Technical Chamber of Greece. *The Problem of Asopos River: Suggestions for Its Solution (in Greek)*; Technical Chamber of Greece: Athina, Greece, 2009.
27. National Statistical Service of Greece. Manual of the International Statistical Classification of diseases, Injuries and Causes of Death. Available online: [http://dlib.statistics.gr/portal/page/portal/ESYE/showdetails?p\\_id=10101127&p\\_derive=book&p\\_topic=10008115](http://dlib.statistics.gr/portal/page/portal/ESYE/showdetails?p_id=10101127&p_derive=book&p_topic=10008115) (accessed on 22 September 2013).
28. Dobson, A.J.; Kuulasmaa, K.; Eberle, E.; Scherer, J. Confidence intervals for weighted sums of Poisson parameters. *Stat. Med.* **1991**, *10*, 457–462.
29. Ulm, K. A simple method to calculate the confidence interval of a standardized mortality ratio (SMR). *Am. J. Epidemiol.* **1990**, *131*, 373–375.
30. Mc Michael, R.F.; DiPalma, J.R.; Blumstein, R.; Amenta, P.S.; Freedman, A.P.; Barbieri, E.J. A small animal model study of perlite and fir bark dust on guinea pig lungs. *J. Pharm. Methods* **1983**, *9*, 209–217.

© 2013 by the authors; licensee MDPI, Basel, Switzerland. This article is an open access article distributed under the terms and conditions of the Creative Commons Attribution license (<http://creativecommons.org/licenses/by/3.0/>).