CEN INTEGRATED ENVIRONMENTAL MANAGEMENT UNIT

Environmental and Rural Development Specialist

POST-APPLICATION DRAFT SCOPING REPORT

Proposed development and operation of a bulk mineral ore storage terminal and conveyors

Saldanha Bay Municipality,

West Coast District Municipality,

DEADP NOI Reference: 16/3/3/6/7/2/F4/17/3147/25

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POST-APPLICATION DRAFT SCOPING REPORT

PROPOSED DEVELOPMENT AND OPERATION OF A BULK MINERAL ORE STORAGE TERMINAL AND CONVEYORS

SALDANHA BAY MUNICIPALITY,

WEST COAST DISTRICT MUNICIPALITY,

WESTERN CAPE

FOR 30 DAY COMMENT AND REVIEW

DATE OF PUBLIC PARTICIPATION: 9 MARCH – 11 APRIL 2025

THIS REPORT IS BASED ON THE PRE-APPLICATION DRAFT SCOPING REPORT
ADDITIONS AND CHANGES ARE INDICATED IN BLUE FONT ZNC UNCDERLINED.

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Date of Public Participation : 9 MARCH – 11 APRIL 2026

REVISIONS TO THE SCOPING REPORT

Version	Date	Comment
0	31 October 2025	Pre-application Draft Scoping Report for Public Participation
1		Post-application Draft Scoping Report for Public Participation

EXECUTIVE SUMMARY

A. INTRODUCTION

Newfields Investments (Pty) Ltd (Newfields) is proposing to develop and operate a bulk mineral ore storage terminal (storage and handling facility) on Farm RE/1139 located in Saldanha Bay, in the Saldanha Bay Local Municipality, West Coast District Municipality, in the Western Cape. The storage and handling facility for manganese ore is planned to have an initial throughput capacity of 8 million tons of ore per annum (MTPA) and will be capable of handling up to 12MTPA of manganese throughput per annum should market conditions dictate.

The Newfields bulk mineral ore storage and handling facility will store manganese ore in closed silos, until required for loading onto ships for export. The entire process of mineral ore handling through the facility is a closed process and is designed for near zero dust emission.

In terms of the 2014 Environmental Impact Assessment (EIA) Regulations (as amended, 2017) published in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), an environmental authorisation (EA) is required to be in place before the project can commence. In terms of the National Environmental Management: Air Quality Act 39 of 2004 (NEM:AQA) an Atmospheric Emissions Licence (AEL) is required and will be applied for at the West Coast District Municipality.

CEN Integrated Environmental Management Unit (CEN IEM Unit) was appointed by the Newfields as the independent Environmental Assessment Practitioner (EAP) to undertake the Environmental Impact Assessment (EIA) process for the proposed manganese storage handling facility.

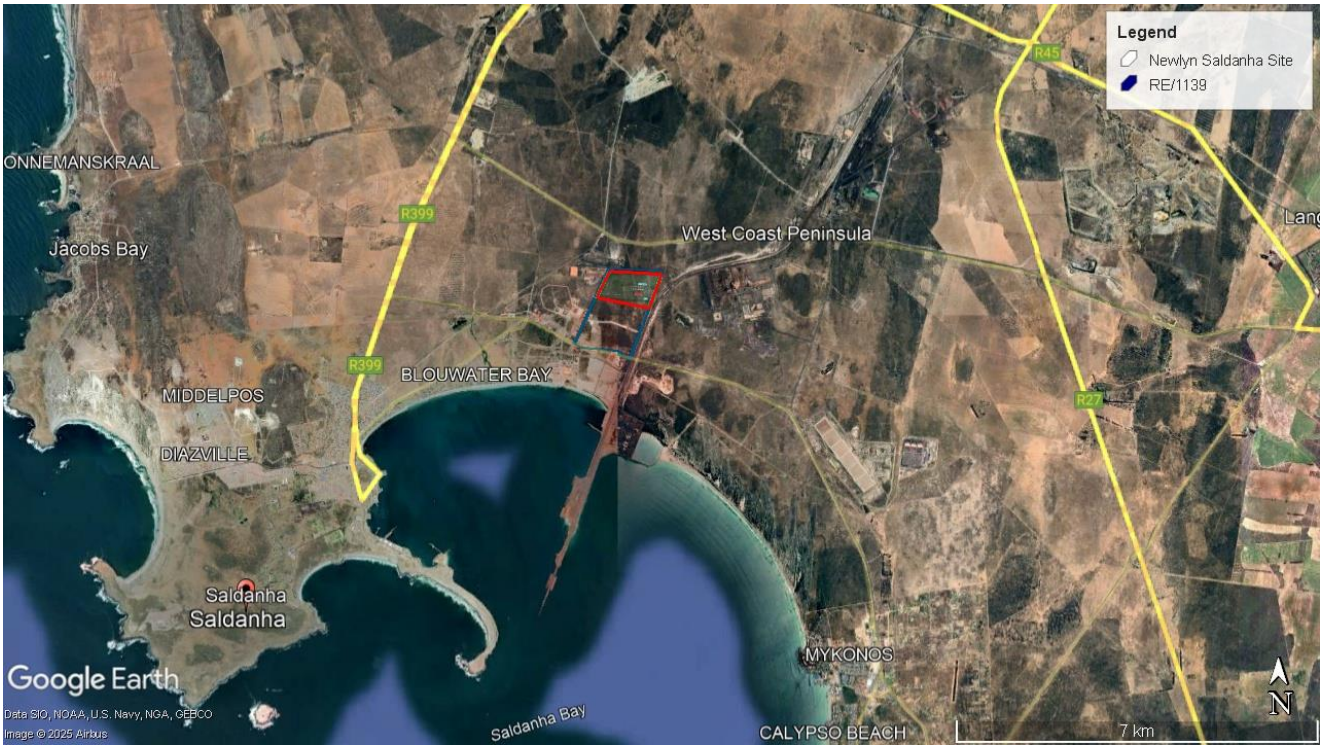

Figure 0-1: Locality of the proposed bulk mineral ore storage facility.

B. PROJECT DESCRIPTION

Transport to Newfields Terminal

The manganese ore will be transported to Saldanha by rail from mines located in the Northern Cape Province. The current maximum weight per wagon including cargo is 120 tons, implying that each wagon will contain approximately 100 tons of ore. The ore will be unloaded using the existing Transnet Tippler 3. The ore will be tipped into a hopper from where it will be fed to a conveyor for transport to the silos at a rate of 5000 tons per hour (tph).

Ore Storage

From the tippler, the ore will be transported to the silos by conveyor belts. The conveyor belts will be enclosed units, i.e. totally enclosing the material, traversing the distance between the tippler and transfer tower above ground.

At the transfer tower, the ore will be diverted to either one of two conveyor belts so that either of the two rows of silos can be accessed. The conveyors over the top of the silos are open trough conveyor belts, but completely closed in a doghouse guarding unit, to limit any dust or noise emission. A dust filter system will be included on the chute. The ore will be dropped into a chute at the top of the silo. Each silo will have capacity of 65 000t and will be filled one at a time.

Discharge from the silos will be designed as mass flow through hoppers. The discharge will be initiated through the control system once a ship is ready to receive ore. The discharge will occur to conveyors at the bottom of each silo via a discharge chute. Each belt will transfer at the rate of 5 000 tph.

A total of twelve (12) silos are planned; each will have a 35-meter diameter and will be approximately 50 meters in height.

The wear and tear within the silos from the manganese ore has been considered in the design of the silos. The silos will have a funnel flow design that allows the manganese ore to move into and from the silos from the middle of the silo. Thus limited friction along the sides of the silos would occur, compared to a mass flow design where the ore would slide against the sides. The silo walls will ~~be 0.5m thick and will also~~ have a hardening on the walls. The ore will settle evenly within the silos through rotational screw conveyors.

All dust captured in the dust extraction systems will be added to the silo storage via a conveyor feed, and will not be disposed of as waste.

Conveying ore to the harbour

The outgoing conveyor belts will be trough conveyors contained in fully enclosed housing transporting ore to the Port of Saldanha.

The length of conveyors from the silos to the berths is approximately 5.1 km and will cross over roads and rail lines, where needed. The conveyor will be within a 10 meter wide corridor.

Ship-loading

Each ship loader can load at the rate of 5 000 tph. The two ship loaders can load two ships at a rate of 5 000 tph each, or a single ship at 10 000 tph.

Associated Infrastructure

Supporting infrastructure and bulk services will also be developed; and include, inter alia:

- Site access and internal roads
- Offices, storage areas, workshops
- Stormwater management
- Water supply
- Electric supply

C. LEGAL ENVIRONMENTAL REQUIREMENTS

NEMA EIA Listed activities, 2014, as amended

The NEMA EIA Regulations, 2014 as amended, set out a list of identified activities that may not commence without environmental authorisation from the competent authority. **Table 0-1** provides the EIA listed activities that are triggered by the proposed Newfields bulk mineral ore storage and handling facility.

An application for Environmental Authorisation (EA) will be made to the competent authority (CA). The Western Cape Department of Environmental Affairs and Development Planning (DEADP) will be the CA for the proposed project. The Scoping and Environmental Impact Assessment process is required to be followed as part of this application process due to activities within Listing Notice 2 being applicable.

Table 0-1: NEMA EIA Listed Activities requiring environmental authorisation

Listing Notice 1 - Activity No(s):	
LN1 - GNR 327 – Activity 17 Development— (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; in respect of— (e) infrastructure or structures with a development footprint of 50 square metres or more — but excluding— (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (dd) where such development occurs within an urban area	The port conveyor will be within 100 m of the HWM, however the conveyor will be on an existing footprint of the Port of Saldanha, therefore it is not deemed applicable.
LN 1 - GNR 327 – Activity 19a The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation, removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from— (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or (g) is for maintenance purposes undertaken in accordance with a maintenance management plan; (h) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	The port conveyor will be within 100 m of the HWM, however it will be on an existing footprint of the Port of Saldanha, therefore Activity 17 of Listing Notice 1 it is not deemed applicable.
LN1 - GNR 327 – Activity 28 Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	Re/1139 is zoned as Agricultural; however no agricultural activities / land use is being undertaken. The site is currently vacant. The site is proposed to be rezoned to industrial II. The area to be developed is bigger than 1ha in extent.
Listing Notice 3 - Activity No(s):	

LN3 – GNR 324 - – Activity 4 The development of a road wider than 4 metres with a reserve less than 13, 5 meters i. Western Cape ii. Areas outside urban areas; (aa) areas containing indigenous vegetation	Development will be within the Besaansklip Industrial Area. In terms of the definition provided in the EIA Regulations, the property is considered to be outside an urban area. An access and internal roads wider than 4m will be developed. The site is currently vacant with indigenous vegetation.
LN3 - GNR. 324 - Activity 12 The clearance of an area of 300 square metres or more of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. i. Western Cape i. Within any critically endangered or endangered ecosystem listed in terms of Section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered In the National Spatial Biodiversity Assessment 2004.	Clearing of more than 300m^2 of indigenous vegetation will be required. The vegetation on site is mapped as Saldanha Flats Strandveld which is classified as Endangered and Saldanha Limestone Strandveld which is classified as Critically Endangered. In terms of the Western Cape Biodiversity Spatial Plan, 2023, the site is located within a terrestrial critical biodiversity area (CBA) 1 and 2 (degraded). The proposed silo storage falls within a single vegetation unit, Saldanha Flats Strandveld, with the port conveyor section passing through two additional vegetation units, namely Saldanha Limestone Strandveld and Langebaan Dune Strandveld (Mucina & Rutherford, 2006). Saldanha Flats Strandveld and Langebaan Dune Strandveld have an Endangered conservation status, while Saldanha Limestone Strandveld has a Critically Endangered Status (NBA: RLE, 2022).
Listing Notice 2 - Activity No(s):	
LN2 - GNR. 325 -Activity 6 The development of facilities or infrastructure for any process or activity which requires a permit or license or an amended permit or license in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent	Atmospheric Emissions License (AEL) is required for activities triggered under the National Environmental Management: Air Quality Act: Subcategory 5.1: Storage and Handling of Ore and Coal. Location designed to hold more than 100 000t of ore and will be outside a mining area.
LN2 - GNR. 325 -Activity 15 The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or)ii) maintenance proposes undertaken in accordance with a maintenance management plan.	The overall site is approximately 60 ha in extent. Clearance of 33 ha is expected for the storage and handling facility and supporting structures and infrastructure.

National Environmental Management: Air Quality Act 39 of 2004

The National Environmental Management: Air Quality Act (No. 39 of 2004) (NEM:AQA) aims to regulate air quality in order to protect the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development while promoting justifiable economic and social development.

A list of activities which result in atmospheric emissions which may have a significant detrimental effect on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage is published in GN 893 of 22 November 2013, in term of Section 21 of NEM:AQA.

An Atmospheric Emission Licence (AEL) is required as the proposed Newfields Manganese Storage and Handling Facility triggers a listed activity in GN 893. The AEL is issued by the West Coast District Municipality and the application for the

AEL is being undertaken by the Air Quality Specialist. The AEL application will be for the full potential end state of 12 million tons per annum.

D. DFFE SCREENING TOOL

A screening tool has been developed by the Department of Forestry, Fisheries and Environmental Affairs (DFFE). The Screening Tool identifies related exclusions and/ or specific requirements including specialist studies applicable to the proposed site and/or development, based on the national sector classification and the environmental sensitivity of the site.

A Screening Tool Report referred to in Regulation 16(1)(v) of the EIA Regulations 2014, must accompany any application for Environmental Authorisation.

A screening tool report was generated for the proposed project and the following environmental sensitivities are identified. These have been used as a guide to generate the recommended list of specialist studies and corresponding sensitivity level:

Table 0-2: Environmental Sensitivities

Theme	Screening Tool Report Sensitivity	Site Verification Sensitivity
Agricultural	Medium	Low-Medium
Animal Species	High	Low-Medium
Aquatic Biodiversity	Low	Low
Archaeological and Cultural Heritage	Very High	Low
Civil Aviation	High	Low
Defence	Medium	Low
Palaeontology	Very High	Low
Plant Species	Medium	Low
Terrestrial Biodiversity	High	High

E. DESCRIPTION OF PUBLIC PARTICIPATION PROCESS:

The public participation process is carried out according to the NEMA EIA Regulation 41 as amended.

Pre-application Public participation starts by announcing the availability of the Pre-Application Scoping Report public comment and review for a 30 day period (31 October 2025 until 1 December 2025).

- Newspaper advertisements were placed in Die Burger and Weslander on 31 October 2025 and 7 November 2025, respectively.
- Site notices were placed at the Eastern boundary of the site on Freeport Access Road opposite the tipplers, as well as across from where the silos would be located, on Freeport Access Road on 15 October 2025.
- 30-day registration of Interested and affected parties (I&APs) and review and comment period on the pre-application scoping report provided from 31 October 2025 until 8 December 2025.

Post application public participation will include the following (i.e. after the application for Environmental Authorisation has been submitted to the DEADP):

- The Draft Scoping Report will be made available to I&APS and stakeholders for a 30-day review and comment period.
- The Final Scoping Report is updated with comments received from I&APs, submitted to the DEADP for approval. The Final Scoping Report will be made available to I&APs for information purposes only.
- After acceptance of the Scoping Report by the DEADP, the Draft Environmental Impact Report (EIR) will be made available for a 30-day review and comment period to registered I&APs and stakeholders.

- The Draft EIR will be updated with comments received, and the Final EIR will be submitted to the DEADP for authority review and decision making. The Final EIR will be made available to I&APs for information purposes only.

F. PROJECT ALTERNATIVES

The 'no-go' option

The 'no-go' option assumes the *status quo* i.e. baseline environmental conditions and no development of the Newfields bulk mineral ore storage and handling facility.

Site alternatives

The development is proposed on Farm RE/1139 which is currently owned by AfriSam. The northern section (ca 60 ha) is proposed for the development. The southern portion was briefly considered but then dismissed. The proposed site is situated in close proximity to an existing railway line and rail siding; and is in close proximity to the harbour (Port of Saldanha).

Activity alternatives

Two alternatives for the storage of ore have been considered.

Alternative 1 (preferred alternative) is the storage of ore in closed silos. The advantage of a closed storage system is the near zero emissions during loading procedures and during storage time. This is due to dust filtration systems at various areas in the offloading process. The silos are not open to the air and therefore not susceptible to the wind or rain.

Alternative 2 is the storage of ore in an open stockpile yard with stacker-reclaimers. The disadvantages of open storage relate to the dust generated from loading procedures as well as during storage due to high winds. A further disadvantage is that the stockpiles would require regular dust suppression with water. This alternative has been dismissed due to the significant impacts associated with open stockpiles, and that Newfields has opted for the best environmental option for storage in closed silos.

Operational alternatives

Two alternatives for the type of conveyor have been considered. Alternative 1 (preferred alternative) is a closed belt conveyor, which is enclosed in a housing. The closed conveyor limits the dust emissions to near zero and would contain any ore that may spill should the belt conveyor breakdown.

The second alternative would have been an open belt conveyor where the belt is not enclosed in housing, i.e. open to the air. However given Newfields's objective to establish a near zero emission complete solution, this is not an option for further consideration. The open conveyor system is likely to generate dust emissions whilst the ore is being transported from either the rail wagons to the silos or from the silos to the ship loaders. In the event of breakdowns and during normal operations, the risk of the spillage of ore is higher with an open conveyor system.

Layout alternatives

Environmental sensitivities will inform the layout of the proposed storage facilities and supporting structures and infrastructures.

G. POTENTIAL IMPACTS

The following potential impacts have been identified for further study in the EIR:

Potential Impact	**Development Phases**
Loss of indigenous vegetation	Construction
Disruption and / or loss of terrestrial fauna inhabiting the site and loss of habitat	Construction and operations
Heritage, Archaeological and Palaeontological impacts	Construction
Surface Water contamination	Construction and Operational

Potential Impact	Development Phases
Soil erosion and sedimentation	Construction and Operational
Biodiversity impacts	Construction and Operational
Social Impacts	Construction and Operational
Air Quality	Construction and operations
Noise	Construction and operations
Traffic	Construction and operations
Health	Construction and operations
Visual	Construction and operations

H. SPECIALIST STUDIES

The following specialist studies will be carried out:

- Agricultural Assessment (Darren Bouwer, Digital Soils Africa)
- Air quality Impact assessment (Lethabo Air Quality specialists)
- Fauna and avifauna verification and assessment (Jonathan Colville and Callan Cohen)
- Aquatic Biodiversity verification and assessment (Dr Brian Colloty)
- Archaeological and Cultural Heritage screening report and assessment (CTS Heritage)
- Paleontological Impact Assessment (Dewald Wilken
- Terrestrial Biodiversity and Plant Species Verification and Assessment (Jamie Pote)
- Health impact Assessment (Niara Environmental consultants)
- Socio-economic Impact Assessment (Dr Anton de Wit)
- Traffic Impact Assessment (EAS, Cary Hastie)
- Noise impact assessment (dB Acoustics, Barend van der Merwe)
- Visual Impact Assessment (Stephen Stead)
- Biodiversity Offset Study

I. WAY FORWARD

This Draft Scoping Report broadly identified potential impacts associated with the proposed activities. All identified stakeholders will be notified and asked to participate in the environmental process. This Pre-application Scoping Report was made available to registered interested and affected parties for a 30-day (with additional extension provided) review and comment period (31 October 2025 until 8 December 2025).

Once the application form has been submitted the DEADP, the Post-Application Draft Scoping Report (this report) will undergo a further 30 day comment and review period. After which the Draft Scoping Report will then be updated accordingly, and the Final Scoping Report will be submitted to the DEADP for review.

A full copy of the Post—application Draft Scoping Report will be made available in electronic format to all those that request it and will be available on the CEN IEM Unit website.

The comment and review period for the Post-Application Draft Scoping Report: 9 March 2026 until 11 April 2026.

All comments on this Pre application Scoping Report to be addressed to:

Dr M Cohen / Ms I van der Merwe

Email: irma@environmentcen.co.za

J. CONCLUSION AND RECOMMENDATIONS

A number of potential impacts have been highlighted for further investigation in order to assess their significance, and to determine the need for the implementation of mitigation measures in order for the overall project to be environmentally sustainable.

It is, therefore, recommended that the studies be conducted for the proposed project in the EIA Phase, as described in the Plan of Study for EIA.

It is recommended that the Scoping Report be approved by the DEADP, and that permission be granted to continue with the EIA Phase of the process.

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LIST OF ABBREVIATIONS

AEL	Atmospheric Emissions License
CA	Competent Authority
CBA	Critical Biodiversity Area
DEADP	Western Cape Department of Environmental Affairs and Development Planning
DWS	Department of Water and Sanitation
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMP	Environmental Management Programme
GIS	Geographic Information Systems
IAP	Interested and Affected Party
IDP	Integrated Development Plan
IDZ	Industrial Development Zone
LSDF	Local Spatial Development Framework
MAR	Mean Annual Runoff
MPA	Mineral Protected Area
MPT	Multipurpose Terminal
MTPA	Million tons per annum
NEMA	National Environmental Management Act (No 107 of 1998)
NEMAQA	National Environmental Management: Air Quality Act 39 of 2004
NEMWA	National Environmental Management: Waste Act (No 59 of 2008)
NHRA	National Heritage Resources Act (No 25 of 1999)
NWA`	National Water Act (Act 36 of 1998)
R/E	Remaining Extent
SANBI	South African National Biodiversity Institute
SABS	South African Bureau of Standards
SAHRA	South African Heritage Resources Agency
SANS	South African National Standards
SDF	Spatial Development Framework
SDP	Site Development Plan
SDMA	Saldanha Bay Municipal Area
SSOS	Saldanha Bay Strategic Offset Strategy
WCA	Western Cape Department of Agriculture
WCDM	West Coast District Municipality
WCH	Western Cape Department of Heritage
WMA	Water Management Area
WUL	Water Use License

Measuring Units

kℓ/d	Kilolitres per day
ℓ/s	Litres per second
m^2	Square meters
m^3	Cubic meters
m^3/s	Cubic meters per second
m/s	Metre per second
maMSL	Metres above mean sea level
Mℓ/d	Megalitre per day

Mm^3/a	Million/Mega cubic metres per annum/year

1 CHAPTER 1: INTRODUCTION

1.1 BACKGROUND

Newfields Investments (Pty) Ltd (Newfields) is proposing to develop and operate a bulk mineral ore terminal (storage and handling facility) on Farm RE/1139 located in Saldanha Bay, in the Saldanha Bay Local Municipality, West Coast District Municipality, in the Western Cape. The storage and handling facility for manganese ore is planned to have an initial throughput capacity of 8 million tons of ore per annum (MTPA) and will be capable of handling up to 12MTPA of manganese throughput per annum should market conditions dictate.

The Newfields bulk mineral ore storage and handling facility will store manganese ore in closed silos, until required for loading onto ships for export. The entire process of mineral ore handling through the facility is a closed process and is designed for near zero dust emission.

In terms of the 2014 Environmental Impact Assessment (EIA) Regulations (as amended, 2017) published in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), an environmental authorisation (EA) is required to be in place before the project can commence. The competent authority for the Environmental Authorisation is the Western Cape Department of Environmental Affairs and Development Planning (DEADP).

In terms of the National Environmental Management: Air Quality Act 39 of 2004 (NEM:AQA) an Atmospheric Emissions Licence (AEL) is required and will be applied for at the West Coast District Municipality.

The NEMA EA application process requires a Scoping Report and Environmental Impact Report.

This chapter presents the background to the Scoping Report and includes an overview of the structure of the report.

1.2 APPLICANT

The Applicant is Mr Rajendra Balmakhun of Newfields Investments (Pty) Ltd.

1.3 PURPOSE OF THE ENVIRONMENTAL SCOPING REPORT

The main purpose of this Environmental Scoping report is to:

- Make an application to the DEADP
- Describe the proposed activity and nature of the receiving environment in sufficient detail to allow the reader to make an informed decision on the suitability of the project proposal
- Provide an outline of all legislation and guidelines that have been considered in the preparation of the report
- Identify feasible and reasonable project alternatives including advantages and disadvantages of these
- Identify and describe environmental issues and potential impacts
- Obtain comments and concerns from Interested and Affected Parties on the proposed development and address the environmental concerns raised.
- Describe the methodology that will be followed in assessing impacts and alternatives
- Develop a plan of study for EIA, including Terms of Reference for any specialist studies

1.4 TERMS OF REFERENCE

The Terms of Reference established for the environmental assessment of the proposed project include:

- Conduct the necessary environmental investigations to produce the required scoping report

- Identify potential significant negative and positive environmental impacts associated with the proposed development
- Identify and describe reasonable and feasible project alternatives
- Engage the public and relevant stakeholders throughout the environmental assessment process and incorporate all comments in the Scoping Report

This environmental scoping assessment was designed to obtain sufficient information to evaluate the proposed activities and to determine and identify potential significant impacts. The information contained in this report will guide the further investigation for the environmental impact assessment, allow for specialist Terms of Reference to be established, and assist the authorities in making an informed decision when considering the application for environmental authorisation. The application procedure as defined by the EIA Regulations, 2014 (as amended) is illustrated in **Figure 1-1**.

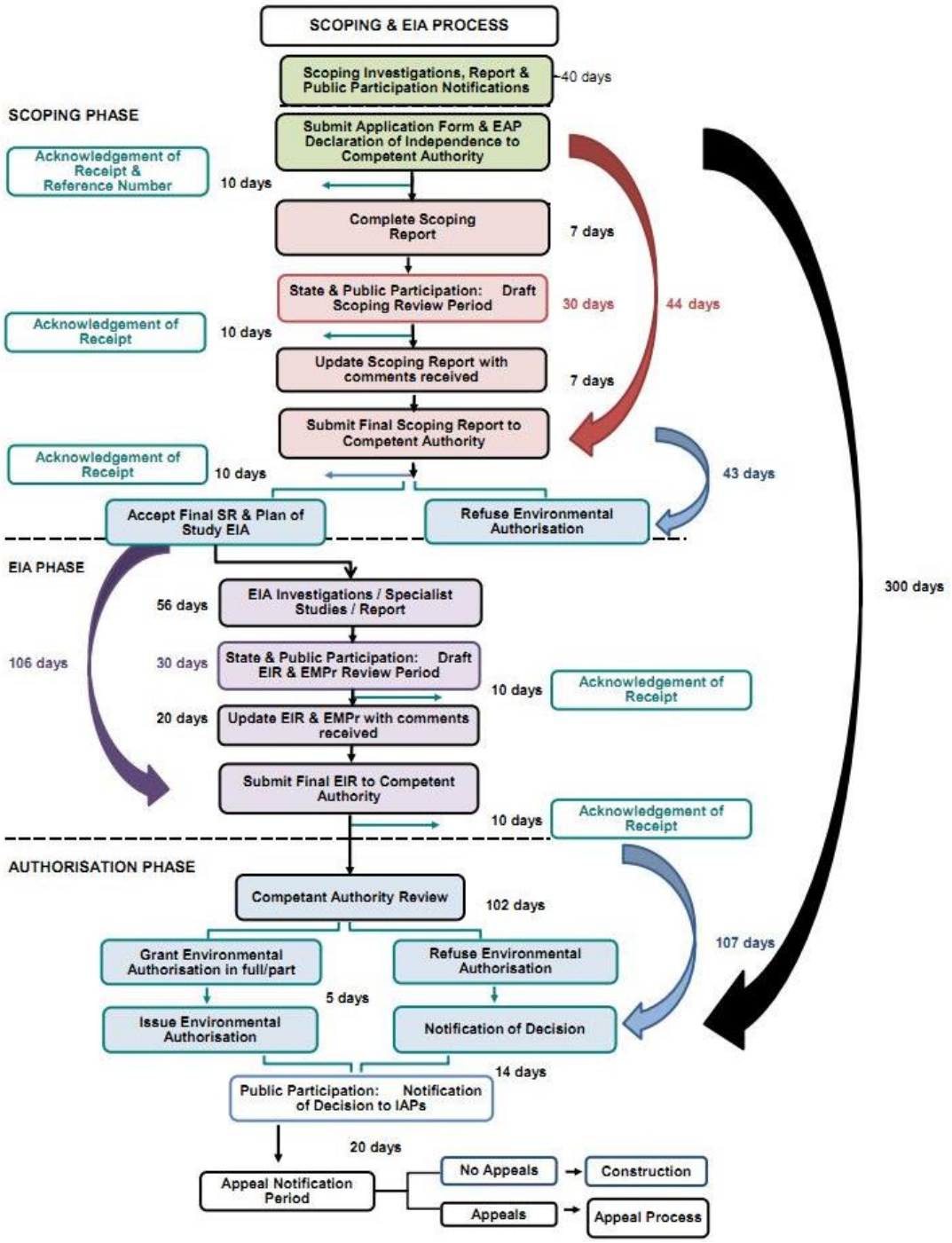

Figure 1-1: Scoping & EIA Process

1.5 EXPERTISE OF RESPONSIBLE ENVIRONMENTAL PRACTITIONER

CEN Integrated Environmental Management Unit (CEN IEM Unit) was appointed by the Newfields as the independent Environmental Assessment Practitioner (EAP) to undertake the Environmental Impact Assessment (EIA) process for the proposed manganese storage handling facility.

EAP company:	CEN Integrated Environmental Management Unit
Environmental Assessment Practitioner (EAP)	Irma van der Merwe

Professional Registration	Registered EAP with EAPASA, 2022/6042
Years of Experience	10
Environmental Assessment Practitioner (EAP)	Lucille Behrens
Professional Registration	Registered EAP with EAPASA, 2016/38
Years of Experience	19

Curriculum Vitae of the persons responsible for the compilation of this Scoping Report are attached as Appendix A.

Project Team

Name	Organisation
Irma van der Merwe	CEN Integrated Environmental Management Unit
Lucille Behrens	CEN Integrated Environmental Management Unit
Kirusha Govender	Newfields Investments (Newylyn Investments)
Jeanette Albertyn	Lethabo Air Quality Specialist
Chris Albertyn	Lethabo Air Quality Specialist

1.6 STRUCTURE OF REPORT

Chapter 1 of the report presents a background to the Scoping procedure.

Chapter 2 describes and explains the project proposal and places it in context with relevant planning guidelines.

Chapter 3 describes the project details relevant environmental planning guidelines.

Chapter 4 describes the receiving environment.

Chapter 5 identifies and describes project alternatives.

Chapter 6 describes the methodology.

Chapter 7 describes the plan of study for the EIA and the impact assessment methodology that will be followed in deriving and assessing impacts and alternatives, and ensuring the report is in compliance the relevant legislation, regulations and guidelines

Chapter 8 details the public participation process. .

Chapter 9 entails the recommendations and conclusion.

A list of appendices and reference list is provided.

Table 1-1: Structure of the Report

Description	**NEMA EIA Regulations 2014, Appendix 2**	**Chapter**
Introduction and background to the project. Details of the Applicant, EAP (including expertise, project team and Competent Authority	2(1)(a)	Chapter 1
A description of the proposed project, including the need and desirability and description of properties.	(2)(1)(b), (2)(1)(c), (2)(1)(d) (2)(1)(f)	Chapter 2

Description	NEMA EIA Regulations 2014, Appendix 2	Chapter
Legislation and guidelines that pertain to the project	(2)(1)(d) (2)(1)(e)	Chapter 3
A description of the receiving affected environment.	(2)(1)(g)	Chapter 4
A description of alternatives	(2)(1)(c) (2)(1)(g) (2)(1)(h)(i)	Chapter 5
A description of all environmental issues and potential impacts identified.	(2)(1)(g)	Chapter 6 & 7
Plan of Study for EIA phase.	(2)(1)(h)(i-vi, vii-iix)	Chapter 7
Public Participation Process	(2)(1)(h)(vii) (2)(1)(i) (2)(1)(k)	Chapter 8
Conclusion and Recommendations, including oath or affirmation by EAP	(2)(1)(i), (2)(1)(j)	Chapter 9 and Chapter 6

2 CHAPTER 2: PROJECT AREA AND NEED AND DESIRABILITY

2.1 INTRODUCTION

Newfields Investments (Pty) Ltd (Newfields) is proposing to develop and operate a bulk mineral ore terminal (storage and handling facility) on Farm RE/1139 located in Saldanha Bay, in the Saldanha Bay Local Municipality, West Coast District Municipality, in the Western Cape. The storage and handling facility for manganese ore is planned to have an initial throughput capacity of 8 million tons of ore per annum (MTPA) and will be capable of handling up to 12MTPA of manganese throughput per annum should market conditions dictate.

The proposed bulk mineral ore terminal will be a near zero environmental impact facility designed to export heavy minerals (manganese). The facility will store minerals in closed silos, until required for loading onto ships. The entire process of mineral handling through the facility is a closed process and is designed for near zero dust emission.

The bulk mineral ore terminal will have an initial throughput capacity of 8 MTPA. The final throughput capacity will be 12 MTPA, depending on market dynamics.

2.2 LOCATION

The terminal is proposed to be located on Farm RE / 1139 in Saldanha Bay. The property, RE/1139, is approximately 180.17 ha in extent (SG Code: C04600000000113900000). The proposed storage and handling site is proposed to be situated on the northernmost section of Farm RE/ 1139.

The site is zoned as Agriculture and will be rezoned to Industry II. The site falls within the Basaansklip Industrial area, within the jurisdiction of the Saldanha Bay Local Municipality, within the West Coast District Municipality, in the Western Cape.

Approximate central coordinates: 32°58'47.70"S; 18° 0'3.56"E

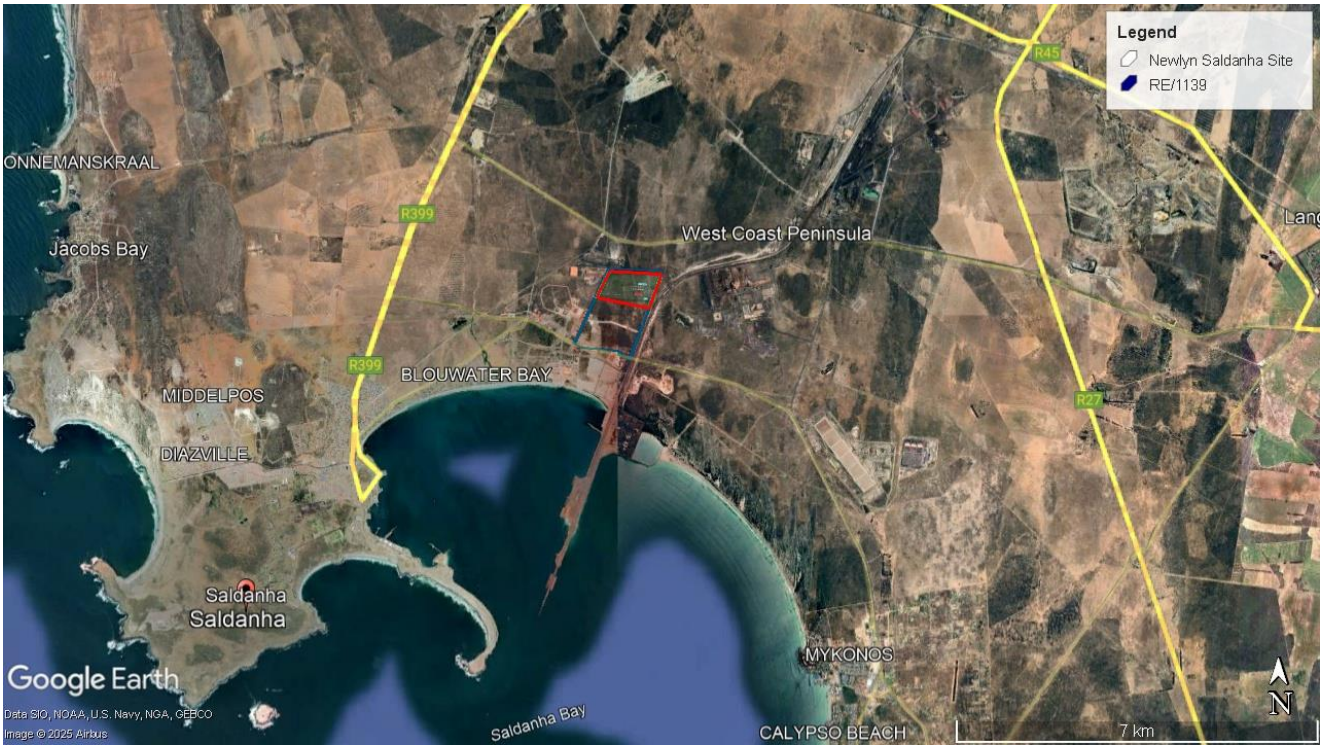

Figure 2-1: Locality of the proposed development on RE/1139

Figure 2-2: Development proposed on RE/1139

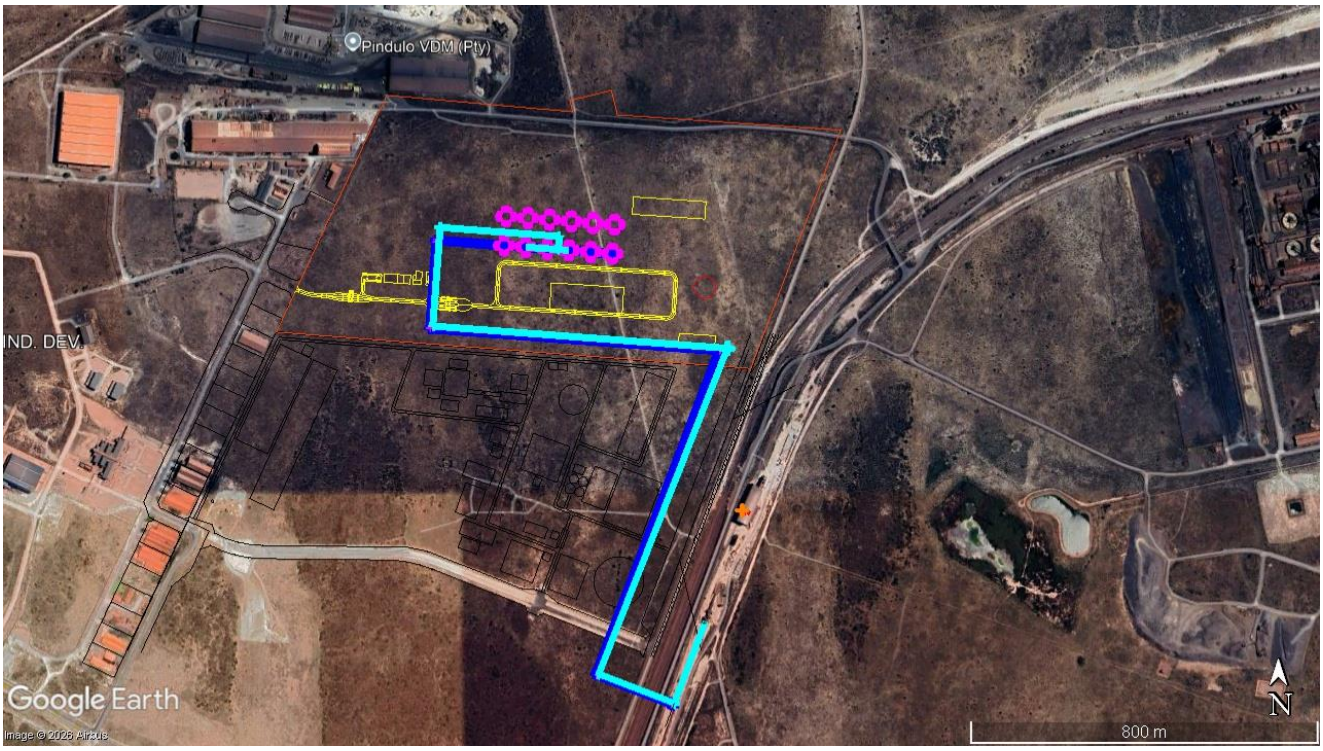

Figure 2-3: Newfields Dry Bulk terminal proposed on northern section of Re/1139

2.3 PROPERTY DETAILS

Table 2-1presents the property details of the proposed storage handling facility and table provides the Surveyor General 21 Digit Codes.

Table 2-1: Property Details

SG Code	C04600000000113900000

Province	Western Cape
District Municipality	West Coast District Municipality
Municipality	Saldanha Bay Local Municipality
Ward Number	5
Nearest Town	Saldanha Bay
Farm Number(s)	1139
Current zoning	The property has been rezoned to Industrial II and is no longer zoned as Agriculture
Current land use	Vacant

2.4 DESIGN DEVELOPMENT

Newfields is proposing to develop and operate a bulk mineral ore storage and handling facility on Farm RE/1139 located in Saldanha Bay, Western Cape.

The storage and handling facility for manganese ore is planned to have an initial throughput capacity of 8 MTPA and will be capable of handling up to 12MTPA of manganese throughput per annum should market conditions dictate.

The proposed storage and handling facility will consist of initially 6 silos, a closed conveyer belt system and ancillary facilities, such as warehousing, parking, offices, machinery and electrical workshops as well as stormwater management facilities.

Figure 2-4: Illustrative example of the silos in and conveyor belt

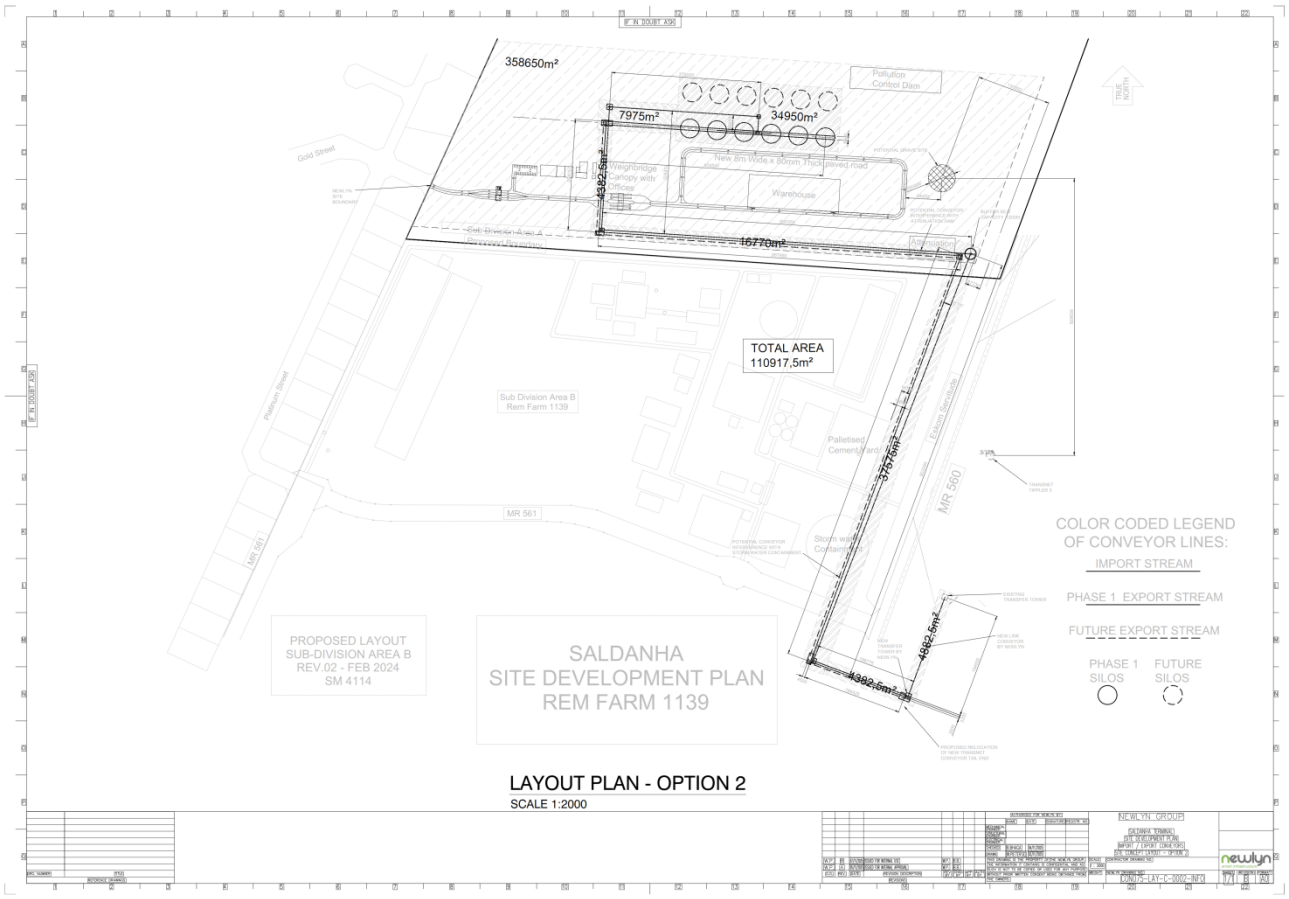

Figure 2-5: The proposed site layout and site access off Platinum Street on the western boundary of RE/1139

The proposed Newfields bulk mineral ore storage and handling facility will be a near zero environmental impact facility designed to export mineral ore.

From the tippler on the existing railway (Transnet Tippler 3), the conveyor belts will be enclosed units, i.e. totally enclosing the material, traversing the distance between the tippler and transfer tower above ground. At the transfer tower the material will be diverted to the conveyor belts. The conveyors over the top of the silos are trough conveyor belts, but completely closed in a dog housing, to avoid any dust or noise emission. A dust filter system will be included on the chute.

The ore will be dropped into a chute at the top of the silo. Each silo will have capacity of 65 000t and will be filled one at a time. A total of twelve silos are planned; each will have a 35-meter diameter and will be approximately 50 meters in height.

Figure 2-6: Example of the tippler

The wear and tear within the silos from the manganese ore has been considered in the design of the silos. The silos will have a funnel flow design that allows the manganese ore to move into and from the silos from the middle of the silo. Thus limited friction along the sides of the silos would occur, compared to a mass flow design where the ore would slide against the sides. The silo walls will be 0.5m thick and will also have a hardening on the walls. The ore will settle evenly within the silos through rotational screw conveyors.

Figure 2-7: Example of the silo design

All dust captured in the dust extraction systems will be added to the silo storage via a conveyor feed, and will not be disposed of as waste.

Discharge from the silos will be designed as mass flow through hoppers. The discharge will be initiated through the control system once a ship is ready to receive material after which discharge will occur to conveyors at the bottom of each silo via a discharge chute. Each belt will transfer at the rate of 5 000 tph.

The outgoing conveyor belts will be trough conveyors contained in fully enclosed housing and connected to the jetty conveyors. The jetty conveyor will be completely enclosed in a housing structure.

The total length of conveyors from site to berths is 5.1 km and will cross over roads and rail lines, where needed. The width of the conveyor will be in a 10 meter wide corridor.

The entire process of mineral handling is a closed process and is designed for near zero dust emission.

Supporting infrastructures and bulk services will also be developed; and include, inter alia:

- Site access and internal roads
- Offices, storage areas
- Stormwater management
- Water supply
- Electric supply

Access Roads

The proposed new access to the site will be gained from Platinum Road at a point opposite Gold Street. The cadastral layout in this area provides for access at this point to the site. It is anticipated that the conveyor access road will be located adjacent to the conveyor route.

2.5 POLICY PLANNING FRAMEWORK

The Port of Saldanha was identified as suitable for the export of iron ore in September 1976. Cargo is imported and exported using a variety of modalities, including road and rail and quayside loading/discharge equipment.

Western Cape Provincial Spatial Development Framework (2014)

The Western Cape Provincial SDF (PSDF) is a spatial planning document that guides district and local spatial initiatives such as IDPs and SDFs. The Western Cape Provincial SDF sets out to put in place a coherent framework for the Province's urban and rural areas that:

- Gives spatial expression to the national and provincial development agendas;
- Serves as basis for coordinating, integrating and aligning 'on the ground' delivery of national and provincial departmental programmes;
- Supports municipalities in fulfilling their municipal planning mandate in line with the national and provincial agendas; and
- Communicates government's spatial development intentions to the private sector and civil society

There are a number of policy objectives identified within the PSDF, including, *inter alia*:

- Consolidating and aligning regional economic infrastructure investment proposals (e.g. Strategic Investment Projects) in integrated regional SDFs for areas including greater Saldanha / Vredenburg;
- Prioritising building a national competitive advantage and innovation within the Western Cape's established and emerging economies.

Saldanha is identified in the PSDF as an emerging industrial complex and as a node for growth and economic activity. This project will increase the annual export of manganese ore to 12Mt and make use of existing Transnet infrastructure and the multi-port terminal (MPT) facilities.

2.5.1 West Coast District Municipality Integrated Development Plan (2020)

The WCDM IDP recognises that the Multi-Purpose Terminal (MPT) at the Port of Saldanha contributes towards South Africa's mining industry by facilitating the export of commodities. Furthermore, the IDP notes a high level of poverty in the WCDM and a need to enhance job creation projects (and retain existing employment opportunities).

The WCDM IDP guides and informs planning, management and development of the municipality through five strategic objectives:

1. Ensuring environmental integrity for the West Coast;
2. Pursuing economic growth and facilitation of job opportunities;
3. Promoting social wellbeing of the community;
4. Promoting bulk infrastructure development services; and
5. Ensuring good governance and financial viability.

This project aims to develop an enclosed bulk store terminal and handling facility for manganese ore which will mitigate negative cumulative impacts of dust fallout on the natural and social environment in the area, create local economic income opportunities and make use of existing infrastructure as far as possible and therefore aligns with the WCDM IDP objectives.

2.5.2 West Coast District Municipality Spatial Development Framework (2020)

The purpose of the WCDM's SDF (2020) is to provide a tool that guides spatial development at a District level. The SDF contextualises the Spatial Development Objectives (SDOs) presented in the Framework by describing spatial development challenges under the following three themes:

1. The built environment;
2. The socio-economic environment; and
3. The biophysical environment.

The SDOs focus on economic development and tourism, housing, the provision of infrastructure and the promotion of renewable energy projects, sustainable water management and the protection and conservation of environmental resources.

The proposed Newfields bulk mineral ore storage and handling facility is considered to be aligned to the spatial development objectives of the WCDM SDF, namely:

- Goal 1: Growth and development opportunities in key sectors/locations:
    - SDO 1: Align the future settlement patterns of the WCDM with areas of real/proven economic potential without compromising conservation objectives and biodiversity;

Within the district context, corridors include the following:

- Transport corridor, which include adjacent road and rail transport facilities;
- Coastal corridor, which is the coastline and adjacent strip developments;
- River corridors, which entails a river with linear agricultural activities running along the alignment of the river;
- Ecological corridors and Landscape linkages (mountain to coast, etc.); and
- Climate change corridors (corridors of biodiversity, natural vegetation and natural landscapes, most resilient to the impacts of climate change).

There is pressing demand to increase the quantity of manganese that can be stored and handled at the MPT. The increased annual throughput of manganese for export purposes is expected to stimulate the economy.

2.5.3 Saldanha Bay Local Municipality IDP (2022 - 2027)

The SBLM fifth Generation IDP (draft) aims to provide guidance to development planning and facilitate integrated implementation. The Saldanha Bay area plays an important role in the broader strategic framework of the national government, as driven by the National Development Plan (NDP) and National Growth Plan. Saldanha Bay was identified as a presidential priority development region in 2011. The NDP identified the Greater Saldanha region as a special intervention area, because of its natural deep-water harbour and industrial development prospects.

The Saldanha Bay Industrial Development Zone (SBIDZ) trading as Freeport Saldanha, was launched in 2013. It serves as an important mechanism for sustainable economic development and job creation through industrialisation. The area forms part of two Strategic Integrated Projects (SIPs), with SIP 5 relevant to the proposed project.

SIP 5 - aims at the development of the Saldanha-Northern Cape Corridor through rail and port expansion, industrial capacity and strengthening maritime support capacity.

Important exports include fish, fish products and steel products. Economic investment is one of the main drivers of future economic growth:

Transnet National Ports Authority plans to invest R5.5 billion in the upgrading of Saldanha Bay Harbour over the next seven years. The upgrades will increase the efficiency of the harbour and create future capacity, making it easier for businesses to trade through the harbour. Transnet had two planned developments that affect Saldanha Bay. The company wants to leverage private sector expertise and as such has completed a feasibility study for the Sishen - Saldanha rail operating lease. Transnet also wanted to issue a request for interest for a private sector operator to develop the back of port iron-ore and manganese facility in Saldanha. This was not issued because of concerns with the environmental impact and is currently on hold. Transnet Port Terminals invested in capacity creation and maintenance at Saldanha by increasing the iron ore terminal Tippler 3. Transnet Port Terminals is planning a refurbishment of stacker reclaimer 3 at the iron ore terminal, (SDM IDP, 2022 – 2027)

It must be noted that the proposed Newfields bulk mineral ore storage and handling facility will be an enclosed system; the following comment has been made by the president on the facilities design which has been approved in the Coega IDZ in the Eastern Cape:

We also commend Newlyn's pledge at the 2023 South Africa Investment Conference to invest R 4 billion into the development of a near-zero dust emission manganese back- of-port storage and handling facility project at Coega, as well as in a similar facility for iron ore at Saldanha Bay.

We wish you well with the completion of these projects that will benefit South Africa, established and emerging miners and the communities of the Eastern and Western Cape. (https://www.thepresidency.gov.za/remarks-president-cyril-ramaphosa-newlyn-px-terminal-launch-durban-kwazulu-natal)

2.5.4 Saldanha Bay Local Municipality Spatial Development Framework (2025 - 2030)

The purpose of the Saldanha Bay Municipal Spatial Development Framework (MSDF) is to guide growth and development in the Saldanha Bay municipal area in a sustainable manner. Saldanha Bay is recognised as an import/export node. According to the National Ports Plan, the Port of Saldanha Bay is recognised as Africa's premier dry bulk port and a key oil & gas service hub in Southern Africa, noted for its reliable logistics and high efficiency. It stands as the leading iron ore export harbour and the deepest natural port on the continent, enhanced by state-of-the-art oil and gas infrastructure and a dedicated Special Economic Zone.

Air Quality Monitoring Network in Saldanha Bay Municipality

Monitoring Stations: Two ambient air quality monitoring stations are established in Saldanha Bay, specifically at Vredenburg and Saldanha Bay itself. These stations measure various pollutants including particulate matter (PM10 and PM2.5), sulphur dioxide (SO_2), nitrogen oxides (NOx), carbon monoxide (CO), and ozone (O_3).

Dust Fallout Monitoring: Seven dust fallout monitoring sites across Saldanha Bay ensure compliance with the South African National Dust Control Regulations, with measurements showing no exceedances of residential and non-residential limits during the assessed period. The seven fallout zones include: Vredenburg Electricity Dept.: SBM-06,

Vredenburg Reservoir: SBM-05, Juffroushoogte: SBM-07, Airport: SBM-01, Saldanha AQM Station: SBM-02, Blue Water Bay: SBM-04, Curro School: SBM-03.

The Saldanha Bay Municipality conducts a regular (monthly) Dust Fallout Monitoring Process, which is thereafter included into a Test Report. The latest test report was conducted between April and May 2024 and includes the monitoring and measurements of heavy metals (iron, lead, zinc, manganese and copper) at the seven identified sites.

During the last Test Report:

- There was valid data for all seven (7) Metal results collected, resulting in 100% data capture for the period under review.
- There were no exceedance of the South African National Dust Control Regulations residential limit of 600mg/m2/day during the period under review;
- There were no exceedances of the South African National Dust Control Regulations non-residential limit of 1200mg/m2/day during the month for sites classed as non-residential;
- Results for lead are evaluated against United States Environmental Protection Agency (US EPA) Federal Register (40 Code of Federal Regulations (CFR) Part 745: Lead; identification of dangerous levels of lead; Final Rule). This regulation establishes: "hazard standards for residential dust and soil lead;
- This represents a cautionary approach in estimating worst-case scenarios for exposure to the general public. Lead levels for the "rest of the yard" (1200ppm) and the "playground areas" (400ppm) were not exceeded during the review period. Care must be taken in evaluating "concentrations" figures when dust fallout mass is low.
- Net lead masses were low and ranged between 2µg and 4µg over the month. These are possibly a better measure than concentration when assessing "heavy metal" levels in dust fallout;
- Meteorological conditions at the Saldanha site were not available due to vandalism.

Industrial Activities and Emission Sources

Steel Industry: Saldanha Steel and other related industries contribute significantly to air pollution through emissions of particulate matter and gaseous pollutants.

Port Activities: The harbour area, with its logistics and shipping operations, is another major source of air pollution, including emissions from ships and associated transport vehicles.

The municipality participates in the National Atmospheric Emission Inventory System (NAEIS), reporting emissions primarily from Section 21 listed activities as per the National Environmental Management: Air Quality Act (NEMAQA).

Regulatory Framework and Compliance

Air Pollution Control By-laws: Local Legislation: Published on 24 December 2012, these by-laws provide a regulatory framework for controlling emissions and managing air quality within the municipality.

Licensing and Enforcement: Atmospheric Emission Licenses (AELs): A total of 23 listed activities within the WCDM area have been licensed, including 16 AELs and 7 PAELs. These licenses ensure that industrial activities comply with emission standards and contribute to better air quality management.

The SBLM SDF references the importance of identifying and defining the functional hierarchy of the towns within the SBLM with regards to their economic functions and services based on their comparative advantages. The SBLM identifies the natural deep-water Port of Saldanha Bay and the related industrial complexes as one of the municipalities' comparative advantages and emphasizes the importance of strategic port and industrial development to maintain the industrial complex (SBLM, 2019).

This project has the potential to unlock macro-economic benefits on a national scale by expanding the country's manganese export potential.

2.5.5 Greater Saldanha Area Draft Environmental Management Framework (2021)

The Environmental Management Framework (EMF) for the Greater Saldanha Area encompasses the Saldanha Bay Municipal Area (SBMA) and a portion of the Bergrivier Municipality (BRM). The extent of the area included in the EMF was determined based on environmental factors. Initially, it was planned to cover only the SBMA. However, since the northern boundary of the SBM lies partially on the southern bank of the Berg River, the study area was expanded to include the river and its estuarine system, ensuring they fall under a single environmental planning domain.

Coastal development in Langebaan and Saldanha extends close to the water, causing environmental stress from erosion, trampling, and habitat loss, and leading to increased stormwater runoff into the bay and lagoon. Coastal setback lines, established under the Integrated Coastal Management Act, restrict development in sensitive or hazardous areas to guide planning and management decisions, with multiple lines potentially set for various purposes, like erosion control.

The Western Cape faces increasing water supply challenges due to climate change and population growth. The semi-arid West Coast, with low average annual rainfall, is particularly affected, relying on limited surface water resources like the Berg River and groundwater from the Langebaan Road Aquifer System. Both the Saldanha Bay Municipality and Bergrivier Municipality receive their water supply from the West Coast District Municipality.

Urban development and land transformation are causing significant biodiversity loss, especially along the coastline. Invasive alien plants, including various Acacia species and Eucalyptus, cover 13% of the Berg River catchment area, particularly near Langebaan and Hopefield. Rivers have lost diversity due to human modifications and invasive species, with indigenous freshwater fish largely disappearing from the Berg River, and some invasive species entering the estuary during dry months.

The socio-environmental system in the Port of Saldanha is highly sensitive to changes in marine water quality. Activities such as increased shipping, oil spills, desalination, and stormwater discharge can degrade water quality, impacting mariculture, marine ecosystems, and the West Coast National Park, as well as industries like desalination and fish processing. Due to the interconnected nature of the system, any change could have widespread and undesirable effects, necessitating extreme caution in implementing activities that could alter these variables. Maintaining good marine water quality is essential for both the environment and industrial operations.

Air pollution dispersion results in lower concentrations when conditions allow for effective mixing, while higher concentrations occur near emission sources when dispersion is inhibited. Sea breezes from the ocean promote vertical dispersion of air pollution through turbulence, whereas stable night conditions with land breezes lead to light winds that spread pollution over long distances in narrow plumes. These breezes are more pronounced in winter due to greater nocturnal cooling.

Population growth rates in the area varied from 4.7% between 1985 and 1991 to 3.45% from 2001 to 2011, with significant increases in residential figures in the rural areas of Vredenburg (63%) and Saldanha Bay (41%), adding around 20,000 residents (Urban Econ, 2005). Despite this growth, the poverty gap widened from 1996 to 2002, indicating increasing impoverishment due to a lack of job opportunities and low skill levels (Urban-Econ, 2005). Rural livelihoods and informal settlements are especially vulnerable to climate change impacts.

Infrastructure in Saldanha Bay, especially for waste and sewage facilities, is inadequate to meet the demands of ongoing development, with seasonal overloads exacerbating the issue. A 2009 assessment found the performance of the seven wastewater treatment plants to be "less than satisfactory." Local residents have raised concerns about the management of waste facilities. Currently, there are two operational waste disposal facilities—Vredenburg and Langebaan—but an application for the closure of the Langebaan facility was submitted in September 2015, leaving only one facility available for waste disposal.

Strategic objectives of the EMF include, inter alia:

- To apply the mitigation hierarchy, namely first striving to avoid and then minimise and remedy negative impacts, as a requirement of the national environmental management principles (Section 2 of NEMA). Where permissible, offsetting may be considered as a last resort;
- To guide land use, including the location of development;
- To guide environmental decision-making regarding development.

In terms of the Saldanha Bay Environmental Management Framework, the proposed site falls within the 'Offset Required' Environmental Management Zone (EMZ).

According to the EMF the limit of acceptable change for an EMZ 1 is:

"No loss of ecosystem functioning to a point where conservation targets are compromised. No development should be allowed in any sensitive and protected areas (i.e. within the Conservation Zone). Low impact development that results in minimal loss of habitat may be allowed on condition that the ecosystem is not compromised in any way. No high impact development should be allowed."

2.2.7 The Saldanha Strategic Offset Strategy 2020

The Saldanha Bay Strategic Offset Strategy (SSOS) 2020 was developed in response to the conflict between Critical Biodiversity Areas (CBAs) and the area designated for large scale industrial expansion around the Port of Saldanha, and the Saldanha Bay Industrial Development Zone (SBIDZ) highlighted by the Greater Saldanha Environmental Management Framework (EMF). The Besaansklip Industrial Area includes large portions of critical biodiversity, which presents a challenge in terms of industrial expansion in the area. The SSOS is a strategic study aimed at facilitating biodiversity offsets at a strategic level, instead of a case-by-case basis, to enable industrial development, while ensuring that conservation targets in the area can be maintained.

There is a Core 1 corridor that dissects the Besaansklip Industrial Area that cannot be developed together with a Core 2 area that requires offsets.

The SSOS has been included in the Greater Saldanha Bay Environmental Management Framework, 2021.

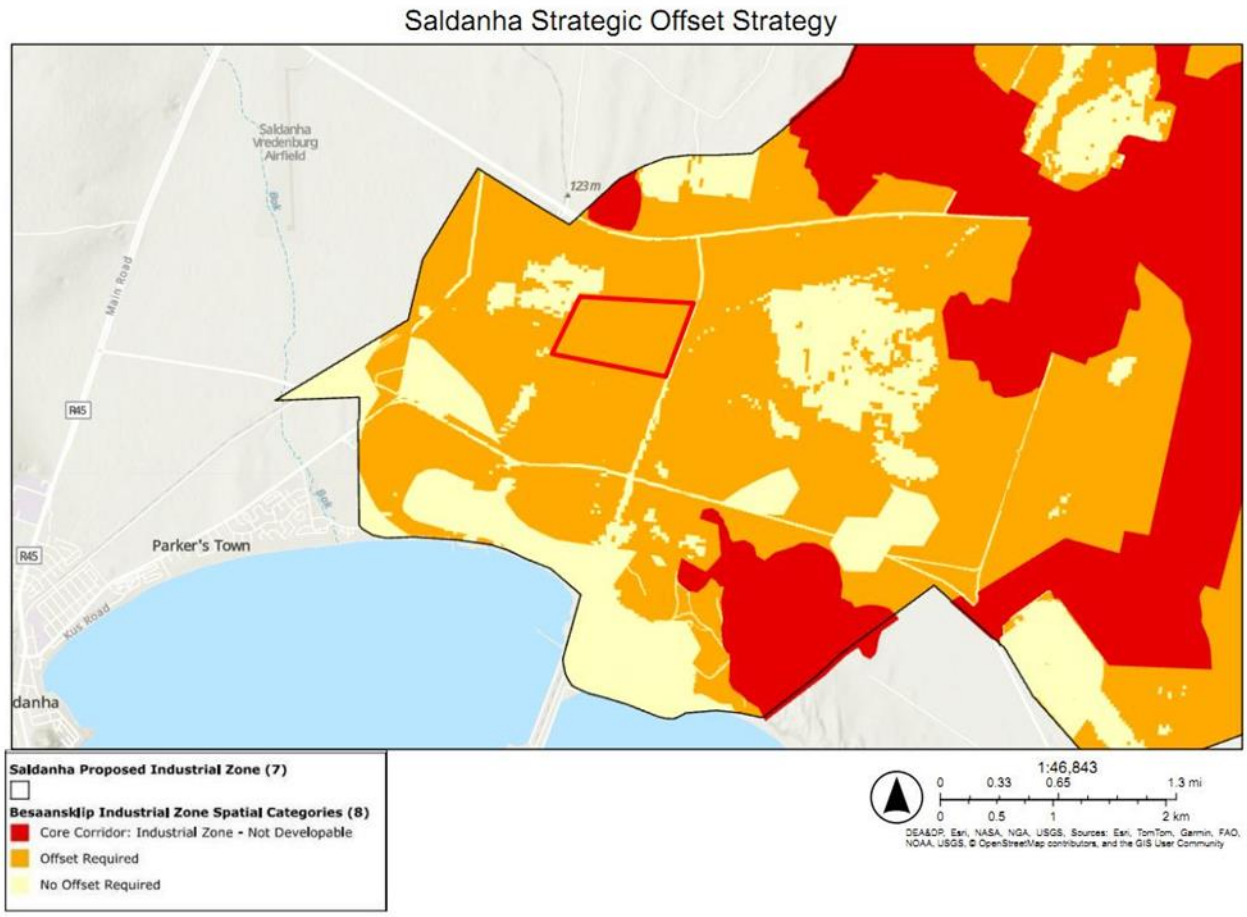

Figure 2-8: Core receiving areas for biodiversity offsets for project in core 1 and 2 areas in SBMA

2.6 NEED AND DESIRABILITY

The storage for manganese ore is to be in a closed and a near zero emissions environment that is necessary to avoid airborne dust particles which is harmful to human health.

The Port of Saldanha is focused on iron-ore export, and more recently manganese export. The Port of Saldanha is a key hub for mineral exports, particularly from the Northern Cape.

South Africa has 75% of world's reserves of manganese yet only supplies 30% of the world's needs. The export logistics for manganese has a huge scope for growth to assist the miners with access to international markets. The intention is to cater for new manganese volumes up to 12 million tons ore per annum.

Transport of the ore will be via rail to the siding and via conveyors form the siding to the storage silos and conveyors to the ship. Materials will be enclosed on all conveyors and within the silos. The entire ore storage and handling process will entail fully enclosed operations to limit airborne dust particles which are harmful to human health.

According to the United States' Environmental Protection a fully enclosed operation achieves 90% efficiency in reducing particulate emissions as particles will settle inside the building instead of being entrained by winds.

The Newfields bulk mineral ore storage and handling facility is designed to further reduce the chance of particulate emissions with other various dust control steps i.e. extracting dust from all transfer points such as railway track offloading, transfer to conveyor system, loading of silos, offloading of silos onto the conveyor system, transfer points in the conveyor system and loading into ship cargo holds for the collection of entrained particular matter in various filters such as fabric filters and cartridge filters. The collection efficiency of such filters is typically in excess of 98% implying that only approximately 2% of particulates may be released to atmosphere.

A Socio-Economic Impact Assessment was conducted by Dr AH de Wit in order to assess the social and economic impacts associated with the proposed bulk mineral ore storage and handling facility. The proposed bulk mineral ore storage and handling facility represents an industrial investment of note. It is anticipated to exert socio-economic influence, locally within the Saldanha Bay Municipality, as well as regionally within the broader municipal district.

The report indicated that the Saldanha Bay Municipality is a key industrial and logistical hub in the region. The port, IDZ, and surrounding industries contribute significantly to the local economy. Despite its strategic importance, the economic performance of the municipality, has been relatively poor over the last few years, due to the COVID-19 pandemic and other factors, such as load-shedding. According to the SBM (2024/25) approximately 29% of the working age population are not economically active and as a result 64% of the municipality's population lives below the poverty line.

The location of the site of the proposed development, Farm RE/1139, is situated directly adjacent to the Sishen-Saldanha railway line. This line is also known as the Ore Export Line. It links manganese ore mines in the Northern Cape to the Port of Saldanha and is used exclusively for the transport of these minerals.

The location of the site of the proposed development is centrally located within an existing industrial area, next to the Port of Saldanha. The site is currently zoned for Agricultural, and rezoning to Industrial is pending.

Table 2-2: Criteria related to land use planning

Criteria related to land-use planning	
Is there a published EMF in place for the area in question?	Yes, Environmental Management Framework for the Greater Saldanha Area, 2021. Refer to Section 2.5.5
If yes, do the reports and information submitted convincingly demonstrate that the proposed activity is consistent with the EMF?	Yes – an offset may be required as indicated by the EMF
Do the reports and information submitted convincingly demonstrate that the proposed activity is in line with the projects and programs	Yes

Criteria related to land-use planning	
identified as priorities within the IDP of the local authority?	
Is there a formal communication from the local authority on record that confirms that the proposed activity is consistent with the IDP?	Meetings with local authorities have been held as part of the air quality assessment and associated licensing requirements; the Pre-application Scoping Report, Draft Scoping Report and EIR will be provided for 30 day review and comment.
Do the reports and information submitted convincingly demonstrate that the proposed activity is consistent with the SDF of the local authority?	Yes
Is the proposed development inside or outside an Urban Edge in the area in which it is located?	In terms of the definition of 'urban area' defined by the EIA Regulations, the site falls outside an urban area. In terms of the Saldanha Bay SDF, the site is within the Besaansklip industrial area.
Is there a formal communication from the local authority on record that confirms that the proposed activity is consistent with the SDF, including location in relation to SDF?	No formal letter, the proposed development was presented to the local municipality as well as the competent authority.
Would authorization of the activity compromise the approved IDP and SDF of the Local Authority?	No

Table 2-3: Criteria for the need for the development

Criteria related to the need for the development	
Do the reports contain a description of the Need for the proposed activity?	Yes, increase capacity for export of magnesium ore in a near zero emissions storage and handling facility. Section 2.5 of this report.
Do the reports demonstrate that the timing of the project is appropriate? Is it needed right now, or perhaps rather at some other time in future? [The IDP and SDF is again a guideline for this]	The timing of the project is appropriate; the project will contribute to priorities identified in the SDF and IDP, refer to section 2.5. The proposed bulk mineral ore terminal will be a near zero environmental impact facility designed to export heavy minerals (manganese).
Do the reports identify alternatives that are feasible and reasonable?	Yes, alternatives will be considered.
Do the reports describe and assess the advantages and disadvantages of the activity or alternatives for the environment?	Alternatives and Possible impacts that the activity may have on the environment have been identified in this Scoping Report and will be assessed in the Environmental Impact Assessment. Refer to section 5 for alternatives and Section 6 for potential impacts.
Do the reports describe and assess the advantages and disadvantages of the activity or alternatives for the community that might be affected by the development?	Possible socio-economic and health impacts have been identified and will be assessed in the EIA.

Criteria related to the need for the development	
Do the reports demonstrate that the community and/or the local area and its economy NEED the activity?	Yes, Refer to Section 2.5

Table 2-4: Criteria related to the availability of infrastructure and services

Criteria related to the availability of infrastructure and services	
Are the necessary services with appropriate capacity currently available [at the time of application] or must additional capacity be created to cater for the project?	Yes – capacity currently available. Eskom indicated that there is sufficient capacity in the network, subject to network strengthening. The Services Report compiled by GLS. The report indicated that there is sufficient capacity for services.
Is there formal confirmation from the Municipality that services are in fact in place [where relevant and applicable]?	Services report has been compiled by GLS; confirmation of services to be provided in the EIR.
In the case of water services [supply and sanitation], is there formal confirmation from DWAF and/or the Water Services Authority/Provider [as applicable]?	Services report has been compiled by GLS; confirmation of services to be provided in the EIR.
If services are not in place, is there convincing proof that the development is provided for in local authority infrastructure planning.	Services are in place.
Should the development not be provided for in formal infrastructure planning, is there an assessment of the implications for an impact on future priorities and placement of services?	N/A
Were ALL the associated activities that are needed for the project identified and their direct and cumulative impacts assessed?	To be provided in the EIR.

Table 2-5: Criteria related to the desirability of the proposed development

Criteria related to the desirability of the proposed development	
[Please note that "desirability" is strongly linked to the spatial location of a proposed activity and whether the proposed land-use is appropriate and cost-beneficial. "Desirability" thus relates mainly to the concept of Best Practicable Environmental Option [BOEO]. Desirability is also affected by opportunity costs, while there is also a strong link to cumulative impacts.	
Do the reports submitted in support contain a description of the Desirability of the proposed activity?	Yes, refer to Section 2.5 and 2.6 of this report.
Do the reports demonstrate that the proposed activity involves a location of land-use that is either the most beneficial for or the least damaging to the environment as a whole, i.e. DOES THE LOCATION FAVOUR THE PROPOSED LAND-USE?	Yes
Do the reports convincingly motivate that the cost and/or disadvantages of the activity to society can be regarded as acceptable?	Yes
Were the implications and impacts of a No-go Option assessed?	The No-Go alternative is an alternative that

Criteria related to the desirability of the proposed development	
	will be considered and assessed in the EIA.
Are there impacts that relate to people's health [noise, odors, vibrations, visual impacts, sense of place, water pollution, waste etc.]	Yes, refer to Section 6.2.
If there are significant health impacts, were they adequately addressed in EIA processes and reports?	To be assessed in the EIA
Opportunity Cost: Will authorization of the activity have a significant negative impact on other land-use opportunities on or adjacent to the site that might be more beneficial than the proposed activity?	No, the proposed activity is located within an industrial area.
Cumulative impacts: Will authorization of the activity lead to unacceptable cumulative impacts?	To be assessed in the EIA

Table 2-6: Criteria related to business, commercial and competitive issues

Criteria related to business, commercial and competitive issues	
Explanatory Notes: *These criteria relate to situations where the key impact of a development is on the financial viability of other commercial operations in a similar area of commerce. An example would be a situation where a newly authorized filling station may close another to close, thereby leading to job losses and thus a significant negative socio-economic impact on employees and their dependents.* *Although this issue is not specifically addressed in the National Draft Guideline, the Constitutional Courts has ruled that it is an issue that must be considered in EIA Authorizations. This ruling cannot be ignored.* *It would have been convenient to argue that, once an application has been shown to be consistent with a Local Authority IDP and SDF and the Local Authority has formally supported the activity, it is then implicit that the issue of the economic carrying capacity of the local area for that type of activity has already been considered and that further consideration of the issue is not needed. Unfortunately, the Constitutional Court has also ruled that an Environmental Competent Authority must independently apply its mind to the matter.*	
Did the process assess the capacity of the local economy to sustain additional commercial ventures in the field of business and was the issue quantified? If yes, was the study done by a person competent in that field?	Yes, socio-economic study was compiled by Anton De Wit and will be included in the EIR.
Were the potential adverse economic impacts on other commercial operations in the same field of business assessed in the EIA process and reports? Were such potential impacts quantified?	N/a
Did, in the EIA process, Interested and Affected Parties raise comments and objections on commercial competitive issues? Were such objections addressed by the applicant, the EAP and the Competent Authority?	Yes – a pre-application Draft Scoping Report was made available for public review and comment. Objections and comments received are included in the comments and response report (see appendix D).
In the case of an Appeal based on issues of business competition, did the appellants convincingly prove [quantified] their contention that the local economy cannot sustain additional business of that nature and that the authorized development will therefore have significant negative socio-economic on themselves and their employees?	NA at this stage

3 CHAPTER 3: LEGAL FRAMEWORK PROJECT DESCRIPTION

3.1 LEGISLATION, REGULATIONS AND GUIDELINES

3.1.1 National Environmental Management Act

The National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended, provides a framework for the integration of the environmental management activities of various spheres of government. The NEMA principles clearly emphasize the need to protect threatened ecosystems and are binding on all organs of state, including local authorities. Section 23 of NEMA determines that Integrated Environmental Management should be employed when any policies, programmes, plans or projects are drawn up to minimise the impact on the environment. An application for development needs to conform to the requirements of the NEMA and EIA Regulations promulgated in terms of Section 24 thereof.

In terms of the EIA Regulations, 2014 (as amended), listed activities as per Table 3-1 within Government Notice (GN) 327, GN 325, and GN 324 are triggered by the proposed Newfields Storage and Handling Facility, thereby requiring Environmental Authorisation from the Western Cape Department of Environmental Affairs and Development Planning (DEADP).

The DEADP is considered to be the Competent Authority as the proposed project is located within the boundary of the Western Cape Province and the Applicant is a private company. The activity does not have implication of international environmental commitments or relations, does not cross provincial or international boundaries, is not being undertaken by a national department or by a provincial department responsible for environmental affairs or any other organ of state reporting to the Western Cape MEC or statutory body of national government, and is not located within a national protected area.

The process to be followed in the application for an Environmental Authorisation is a Scoping and EIA process as a listed activity in Listing Notice 2 (GN325) of the EIA Regulations as amended, is triggered (see Table 3-1).

Table 3-1: EIA Activities requiring environmental authorization

NEMA EIA Listed activity	**Relevance to project**
Activity No(s):	
LN1 - GNR 327 – Activity 17 Development— (v) if no development setback exists, within a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever is the greater; in respect of— (e) infrastructure or structures with a development footprint of 50 square metres or more — but excluding— (aa) the development of infrastructure and structures within existing ports or harbours that will not increase the development footprint of the port or harbour; (bb) where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies; (dd) where such development occurs within an urban area	The port conveyor will be within 100 m of the HWM, however will be on an existing footprint of the Port of Saldanha, therefore it is not deemed applicable.
LN 1 - GNR 327 – Activity 19a The infilling or depositing of any material of more than 5 cubic metres into, or the dredging, excavation,	The port conveyor will be within 100 m of the HWM, however will be on an existing footprint of the Port of Saldanha, therefore it is not deemed applicable.

removal or moving of soil, sand, shells, shell grit, pebbles or rock of more than 5 cubic metres from— (ii) the littoral active zone, an estuary or a distance of 100 metres inland of the high-water mark of the sea or an estuary, whichever distance is the greater; or (g) is for maintenance purposes undertaken in accordance with a maintenance management plan; (h) falls within the ambit of activity 21 in this Notice, in which case that activity applies; (i) occurs within existing ports or harbours that will not increase the development footprint of the port or harbour; or where such development is related to the development of a port or harbour, in which case activity 26 in Listing Notice 2 of 2014 applies.	
LN1 - GNR 327 – Activity 28 Residential, mixed, retail, commercial, industrial or institutional developments where such land was used for agriculture, game farming, equestrian purposes or afforestation on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare; excluding where such land has already been developed for residential, mixed, retail, commercial, industrial or institutional purposes.	Re/1139 is zoned as Agricultural; however no agricultural activities / land use is being undertaken. The site is currently vacant. The site is proposed to be rezoned to industrial II. The area to be developed is bigger than 1ha in extent.
Activity No(s):	
LN3 – GNR 324 - – Activity 4 The development of a road wider than 4 metres with a reserve less than 13, 5 meters j. Western Cape ii. Areas outside urban areas; (aa) areas containing indigenous vegetation	Development will be within the Besaansklip Industrial Area. In terms of the definition provided in the EIA Regulations, the property is considered to be outside an urban area.
LN3 - GNR. 324 - Activity 12 The clearance of an area of 300 square metres or more of indigenous vegetation, except where such clearance of indigenous vegetation is required for maintenance purposes undertaken in accordance with a maintenance management plan. j. Western Cape ii. Within any critically endangered or endangered ecosystem listed in terms of Section 52 of the NEMBA or prior to the publication of such a list, within an area that has been identified as critically endangered In the National Spatial Biodiversity	Clearing of more than 300m^2 of indigenous vegetation will be required. The vegetation on site is mapped as Saldanha Flats Strandveld which is classified as Endangered and Saldanha Limestone Strandveld which is classified as Critically Endangered. In terms of the WC BSP, 2023, the site is located within a terrestrial critical biodiversity area (CBA) 1 and 2 (degraded). The proposed silo storage falls within a single vegetation unit, Saldanha Flats Strandveld, with the port conveyor section passing through two additional vegetation units, namely Saldanha Limestone Strandveld and Langebaan Dune Strandveld (Mucina & Rutherford, 2006). Saldanha Flats Strandveld and

Assessment 2004	Langebaan Dune Strandveld have an Endangered conservation status, while Saldanha Limestone Strandveld has a Critically Endangered Status (NBA: RLE, 2022).
Activity No(s):	
LN2 - GNR. 325 -Activity 6 The development or facilities or infrastructure, for the storage, or storage and handling of a dangerous good, where such storage occurs in containers with a combined capacity of more than 500 cubic metres.	The facility will store mineral ore, which is not considered a hazardous ore in terms of the SANS No. 10234. Therefore this activity is not applicable.
LN2 - GNR. 325 -Activity 6 The development of facilities or infrastructure for any process or activity which requires a permit or license or an amended permit or license in terms of national or provincial legislation governing the generation or release of emissions, pollution or effluent	Atmospheric Emissions License (AEL) is required for activities triggered under the National Environmental Management: Air Quality Act: Subcategory 5.1: Storage and Handling of Ore and Coal. Location designed to hold more than 100 000t manganese ore and will be outside a mining area.
LN2 - GNR. 325 -Activity 15 The clearance of an area of 20 hectares or more of indigenous vegetation, excluding where such clearance of indigenous vegetation is required for (i) the undertaking of a linear activity; or)ii) maintenance proposes undertaken in accordance with a maintenance management plan.	The overall site is approximately 60 ha in extent. Clearance of 33 ha is expected for the storage and handling facility and supporting structures and infrastructure.

3.1.2 National Environmental Management: Air Quality Act 39 of 2004

The National Environmental Management: Air Quality Act (No. 39 of 2004) (NEM:AQA) aims to regulate air quality in order to protect the environment by providing reasonable measures for the prevention of pollution and ecological degradation and for securing ecologically sustainable development while promoting justifiable economic and social development.

A list of activities which result in atmospheric emissions which may have a significant detrimental effect on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage is published in GN 893 of 22 November 2013, in term of Section 21 of NEM:AQA.

An Atmospheric Emission Licence (AEL) is required as the proposed Newfields Manganese Storage and Handling Facility triggers a listed activity in GN 893. The AEL application is being undertaken by the Air Quality Specialist and will be submitted to the West Coast District Municipality. The AEL application will be for the full potential end state of 12 million tons per annum.

The proposed project requires licensing in terms of the NEMAQA for the Subcategory 5.1: 'Storage and Handling of Coal and Ore' with a general description of "Storage and handling of coal and ore not situated on the premises of a mine or works defined in the Mines Health and Safety Act 29 of 1996".

3.1.3 National Water Act

The National Water Act, 1998 (Act No. 36 of 1988) (NWA) aims to regulate the use of water and activities, which may impact on water resources through the categorization of 'listed water uses'. The NWA provides for tiered regulatory control over 11 water uses, as identified in Section 21 of the NWA. A person who wishes to use or who uses water in a manner that is not covered under Schedule 1, General Authorisation, or in a manner that Is not regulated or declared as an existing lawful use, may only use that water under the authority of a Water Use License (WUL).

In terms of the NWA, provision has been made to allow for certain water uses to be authorized under Section 39 of NWA (General authorization process) without going through the water use licensing procedure, provided that the thresholds and conditions of the applicable General Authorisations are adhered to.

In terms of the General Authorisation for Section 21 (c) and (i) water use activities, the following areas are included in the 'regulated areas of a watercourse'-

a) The outer edge of the 1 in 100 year flood line and/or delineated riparian habitat, whichever is the greatest distance, measured from the middle of the watercourse of a river, spring, natural channel, lade or dam;
b) In the absence of a determined 1 in 100 year flood line or riparian area the area within 100m from the edge of a watercourse where the edge of the watercourse is the first identifiable annual bank fill flood bench; or
c) A 500 m radius from the delineated boundary (extent) of any wetland or pan.

No watercourses, drainage lines or wetlands are mapped on the site in terms of the National Freshwater Ecosystem Priority Areas (NFEPA). The site is located in a strategic water source area and an aquatic assessment will be carried out on the site. The information from these reports will confirm if any general authorisation or water use license in terms of the NWA will be required for the project.

3.1.4 National Heritage Resources Act

The protection and management of South Africa's heritage resources are controlled by the National Heritage Resources Act (Act 25 of 1999)(NHRA). The enforcing authority for this act is the South African National Heritage Resources Agency (SAHRA).

In the Western Cape, SAHRA has delegated this authority to Heritage Western Cape (HWC). In terms of the Act, historically important features such as graves, trees, archaeological artefacts/sites and fossil beds are protected. Similarly, culturally significant symbols, spaces and landscapes are also afforded protection.

Section 38 of the NHRA requires that any person who intends to undertake certain categories of development must notify SAHRA and/or HWC at the very earliest stage of initiating such a development and must furnish details of the location, nature and extent of the proposed development.

SAHRA has designed the South African Heritage Resources Information System (SAHRIS) database to assist the developer in providing the necessary information to enable SAHRA to decide whether a Heritage Impact Assessment (HIA) will be required. HWC requires the submission of a Notice of Intent to Develop (NID), which provides details regarding the location, nature and extent of the proposed development. After review of the NID, HWC decides whether a HIA will be required.

Section 38 also makes provision for the assessment of heritage impacts as part of an EIA process and indicates that, if such an assessment is deemed adequate, a separate HIA is not required. There is however the requirement in terms of Section 38(8) for the consenting authority (in this case the DEADP) to ensure that the evaluation of impacts on the heritage resources fulfils the requirements of the relevant heritage resources authority (HWC), and that the comments and recommendations of the heritage resources authority are taken into account prior to the granting of the consent.

Section 38(1) of the NHRA specifies activities that trigger the need for the proponent to notify SAHRA of the proposed development, in order for SAHRA to determine the need for further Heritage Assessment. A Notice of Intend to Develop (NID) has been submitted to HWC by the heritage specialist, Ms Lavin. HWC requested that a full Heritage Impact Assessment (HIA) be conducted as part of the Scoping and EIR process. CTS Heritage has been appointed to conduct the full HIA.

3.1.5 Saldanha Standard Offset Strategy, 2020

The Saldanha Strategic Offset Strategy, 2020,(SSOS) is an implementation plan for biodiversity offsets in the Saldanha Bay Industrial Area (Besaansklip Industrial Area). Its main purpose is to ensure that unavoidable environmental impacts from development are compensated for by conservation outcomes in addition to standard mitigation measures. The strategy includes a spatial component that identifies different areas within the zone for various management actions.

The proposed site is situated within an area that requires offset according to the SSOS, 2020.

3.1.6 Legislation, Policies and Plans

A limited scoping of relevant legislation was undertaken in order to identify legislation, policies and plans related to the proposed project, see Table 3-2

Table 3-2: Summary of Applicable Legislation

Legislation / Guideline	Objective and Relevance
Constitution of the Republic of South Africa (At 108 of 1996)	The Constitution is the supreme law governing all other legislation. Environmental legislation is shaped by the Bill of Rights set out in the Constitution. It sets out the rights for every citizen of South Africa and aims to address past social injustices. With respect to the environment, section 24 of the Constitution states that: "Everyone has the right: a) To an environment that is not harmful to their health or well-being; b) To have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: i. Prevent pollution and ecological degradation; ii. Promote conservation; and iii. Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development". In fulfilment of its constitutional mandate to take reasonable legislative measures that give effect to Section 24, the government has promulgated several environmental laws. These laws provide a legal framework that embodies internationally recognised legal principles. The principal act governing activities that affect the environment is NEMA. The Constitution itself has no permitting requirements. However, the way the environmental right is applied implies that environmental impacts associated with developments should be considered separately and cumulatively. Furthermore, Section 24 includes the notion that justifiable economic and social development should be promoted, through using natural resources and ecologically sustainable development. The Applicant must ensure that significant environmental impacts are avoided; and where impacts cannot altogether avoided, they must be minimised and mitigated throughout the lifecycle of the Newfields Storage and Handling Facility.
DFFE Web-Based Screening Tool	In terms of Regulation 16(1)(b)(v), read with Regulation 21 of the 2014 EIA Regulations, it is compulsory for an EIA application to include a sensitivity report generated by the national web based environmental screening tool4 (DFFE Screening Tool). The content of specialist reports for certain of the themes is prescribed in the Procedures for the Assessment and Minimum Criteria for Reporting on Identified Environmental Themes (Assessment Protocols); and Appendix 6 of the EIA Regulations will not be applicable to such themes. The protocol (Published in Government Notice No. 648 GOVERNMENT GAZETTE 4542110 MAY 2019. Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 October 2020. Published in Government Notice No. Government Notice No. 320, Government Gazette 43110: 20 March 2020. These gazettes are also available free online at www.gpwonline.co.za) provides the criteria for the reporting of requirements for the assessment and reporting of impacts as identified in the

Legislation / Guideline	Objective and Relevance
	DEA Screening tool report. Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020 GAZETTED FOR IMPLEMENTATION: BIODIVERSITY PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON TERRESTRIAL BIODIVERSITY Published in Government Notice No. 320 GOVERNMENT GAZETTE 43110 20 MARCH 2020 GAZETTED FOR IMPLEMENTATION: BIODIVERSITY PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON AQUATIC BIODIVERSITY Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 OCTOBER 2020 GAZETTED FOR IMPLEMENTATION: PLANT SPECIES PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON PLANT SPECIES Published in Government Notice No. 1150 GOVERNMENT GAZETTE 43855 30 OCTOBER 2020 GAZETTED FOR IMPLEMENTATION: ANIMAL SPECIES PROTOCOL FOR THE SPECIALIST ASSESSMENT AND MINIMUM REPORT CONTENT REQUIREMENTS FOR ENVIRONMENTAL IMPACTS ON ANIMAL SPECIES Specialist studies are being undertaken to verify the sensitivity themes as identified in the DFFE Screening Tool. Specific requirements for the content of the EIA specialists' reports for the agricultural; aquatic and terrestrial biodiversity; plant and animal species themes are included in the Assessment Protocols and these specialist reports will comply with the aforesaid for purposes of the EIA.
National Environmental Management: Waste Act (Act 59 of 2008) (NEMWA), as amended	The NEMWA's purpose is to: assist in regulating waste management; ensure the protection of human health; and prevent pollution and environmental degradation through sound waste management principles and guidelines. The NEMWA defines waste broadly It furthermore provides for: • national norms and standards for regulating waste management by all spheres of government; • licensing and control of waste management activities; • remediation of contaminated land; • a national waste information system; and • Provision for compliance and enforcement. The NEMWA imposes a general duty upon waste holders to take reasonable measures to avoid waste generation and, where this is impossible, to: minimise the toxicity and quantities of waste generated; reuse, reduce, recycle and recover waste; and ensure that it is treated and disposed of in an environmentally sound way. Failure to do so is a criminal offence, with a maximum fine of R10 million or imprisonment of up to 10 years, or both. The proposed Newfields Storage and Handling Facility will not require a Waste Management Licence under Category C: "storage of waste at a facility that has the capacity to store in excess of 80 m3 of hazardous waste at any one time, excluding the storage of hazardous waste in lagoons or temporary storage of such waste, but will have to comply with the norm and standards".
Conservation of Agricultural Resources Act (Act 43 of 1983)	In terms of CARA, landowners are legally responsible for the control of weeds and alien vegetation. CARA makes provision for three categories of Alien and Invasive Plants:

Legislation / Guideline	Objective and Relevance
(CARA)	• Category 1a: must immediately be removed and destroyed; • Category 1b: need to be immediately removed and contained; • Category 2: requires a permit to retain the species on site and it must be ensured that they do not spread. All category 2 plants in riparian zones need to be removed; and • Category 3: require a permit to retain these species. All category 3 plants in the riparian zone need to be removed. CARA also regulates the conservation of soil and states that degradation of the agricultural potential is illegal. It furthermore requires the protection of land against soil erosion and the prevention of water logging and associated salinization. No permit under CARA is required for the proposed development.
National Forests Act, No 84 of 1998 (NFA)	In terms of section 15(3) of the NFA, the Minister published a list of protected tree species. The effect thereof is that no person may cut, disturb, damage or destroy any protected tree or possess, collect, remove, transport, export, purchase, sell, donate or in any other manner acquire or dispose of any protected tree or any product derived from a protected tree, except under a licence or exemption granted by the Minister to an applicant and subject to such period and conditions as may be stipulated. Should the proposed development require any licence to disturb a protected tree, it will be duly applied for.
Hazardous Substance Act (Act No. 15 of 1973) (HSA)	The HSA aims to control the production, import, use, handling and disposal of hazardous substances. Under the HSA, hazardous substances are defined as substances that are toxic, corrosive, irritant, strongly sensitising, flammable and pressure generating under certain circumstances and may injure, cause ill-health or even death in humans. Where hazardous substances from any of the 4 groups below are to be used, (see below) care must be taken that they are sourced, transported, handled and disposed of in compliance with HSA. • Group I: industrial chemicals (IA) and pesticides (IB); • Group II: 9 classes of wastes excluding Class 1: explosives and class 7: radioactive substances; • Group III: electronic products and group; and • Group IV: radioactive substances. The HSA provides for the: • Control of certain electronic products; • Division of such substances or products into the groups above in relation to the degree of danger, with licensing requirements for certain activities undertaken in respect of Groups I and III; • Prohibition and control of the importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances and products; and • Matters connected therewith. Hazardous substances may be stored, handled or transported as part of the proposed project and include diesel and other liquid fuel, oil and hydraulic fluid, cement, etc. The proposed development will comply with the HSA, as required
Occupational Health and Safety Act, 1993 (Act	The Applicant will ensure compliance with the OHSA on their sites.

Legislation / Guideline	Objective and Relevance
No. 85 of 1993) (OHSA)	
Other National Legislation and Policy	Other policies, legislation and associated regulations (where applicable) considered as part of the application process include: • National Ports Act (Act No. 12 of 2005). • Disaster Management Act (Act No. 57 of 2002). • Integrated Resource Plan 2019. • Local Government: Municipal Systems Act, No 32 of 2000. • National Development Plan 2030. • Protection of Personal Information Act, No. 4 of 2013. • Water Services Act 108 of 1997. • Promotion of Access to Information Act 2 of 2000 • Promotion of Access to Justice Act 3 of 2000 • Basic Conditions of Employment Act 75 of 1997; • Labour Relations Act 66 of 1995 • The National Biodiversity Offset Guideline, 2023
Guidelines	• Guideline on Public Participation; • Information of Generic Terms of Reference and Project Schedules; • Circular EADP 0028/2014: One Environmental Management System; • Guideline for Involving a Heritage Specialist in an EIA Process (2005); • Guideline for the Review of Specialist Input in the EIA process (June 2005); • Guideline for Environmental Management Plans (June 2005); • Guideline on Alternatives (March 2013); and • Guideline on Need and Desirability (March 2013). • The National Biodiversity Offset Guideline (23 June 2023)

4 CHAPTER THE AFFECTED ENVIRONMENT

4.1 SURROUNDING LAND USES

Saldanha Bay is located on the west coast of South Africa, ~100km north of Cape Town, and is directly linked to the shallow, tidal Langebaan Lagoon. Saldanha Bay is South Africa's largest and deepest natural port, sheltered from the high wave energy prevalent along the west coast. The sheltered nature of the bay has resulted in major development (examples, Marcus Island causeway, Iron Ore Terminal, three small craft harbours, fish processing factories, aquaculture development zone). Langebaan Lagoon is located within the West Coast National Park and was declared a Ramsar Site in 1988, along with the five islands within Saldanha Bay: Shaapen, Marcus, Malgas, Jutten and Vondeling Islands.

The proposed site, Remainder portion of Fram No. 1139 is situated within Saldanha Bay Local Municipality. Surrounding areas include Bluewater Bay, Vredenburg, Saldanha, St Helena Bay, Paternoster and Langebaan. The Langebaan Lagoon, a wetland of international importance and a registered Ramsar site, is located 7 kilometres to the south-east of the port.

Figure 4-1: Overview of the proposed site with Duferco Steel Processing in the far background

Figure 4-2: Overview of the proposed site access of Platinum Street

Figure 4-3: Overview of the proposed site

4.2 CLIMATE

The Saldanha area is characterised by dry warm summer months (November to February) and wetter cool winter months (from May to August). The climate of the area is influenced by the cold Benguela Current and coastal winds.

Summer temperatures range between 15°C and 35°C; winter temperatures range between near freezing and 20°C. The average annual temperature is 19°C.

The SBLM receives an average rainfall of between 200mm and 400mm per annum; the majority of rain recorded is between May and August. February is the driest month.

Winds in the area are predominantly from the south. During the day, wind is predominantly south to south-westerly winds dominating with calm conditions for 2.5% of the time. Night-time wind is predominantly south

and south-south-easterly and with calm conditions for 2.6% of the time. Wind speed exceeded 5.4 m/s for 19% of the time.

The ocean current direction and strength within Saldanha Bay are determined by wind, tides and the flow of cold bottom water into Saldanha Bay. During the summer months (November to February), the prevailing south-southwest winds cause regional scale upwelling. In the winter months (May to August), the more gentle winds predominantly blow from the north-northeast.

4.3 AMBIENT AIR QUALITY

Historically, the main Industrial developments at Saldanha were based on the handling of bulk dry ores and metallurgical processing operations. The main pollutant emitted from operations in the area is particulate matter and several complaints about particulate matter has been lodged to date (Albertyn, 2025).

Ambient concentrations of sulphur dioxide, oxides of nitrogen (NO, NO_2 and NO_x), ozone, and particulates less than 10 microns in diameter (PM-10) are measured at the Saldanha Bay monitoring site and Vredenburg monitoring site in accordance with the latest National Ambient Air Quality Standards and SANS Standard methods.

The following receptors have been identified within 5km of the proposed storage and handling facility:

Table 4-1: Identified receptors within 5km of the proposed storage and handling facility:

Name	Distance from centre	Direction
Hospitals & clinics		
Saldanha Bay Logistix	5.6 km	South-west
Saldanha Cay Clinic	5.8 km	South-west
Weskus Fammed	5.8 km	South-west
Betfa Tehuis	5.2 km	South-west
Kliroe Hospital	8.2 km	South-east
Schools & creches		
St Andrews Primary School	6.6 km	South-west
Laerskool Saldanha	5.4 km	South-west
Weskus Skool	5.2 km	West south-west
Diazville Senior Secondary School	8.8 km	South-west
Diasville High School	8.6 km	South-west
Diasville Primary School	8.3 km	South-west
Middelpos Primary	7.2 km	South-west
Panorama Primêre Skool	5.8 km	South-west
Duimpie Kleuterskool	6.1 km	South-west

4.4 TOPOGRAPHY

The elevations of the study area range from 19 m to 9 m above sea level. The topography of the site area for the proposed silos is relatively flat. The outgoing conveyor from the storage site to the port follows a relatively flat to very gentle slope. Once the conveyor reaches the developed area of the Port, the terrain becomes flat.

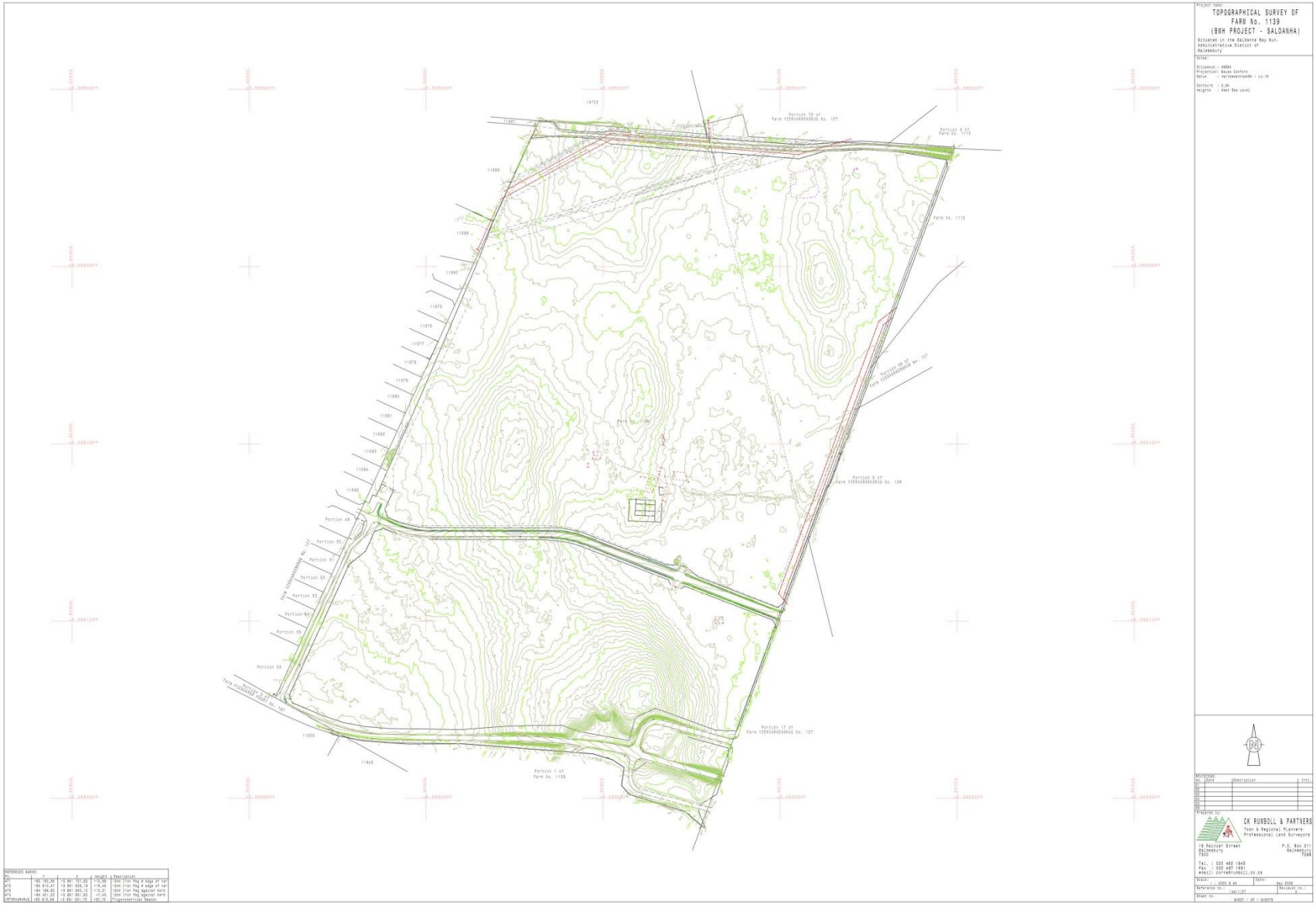

Figure 4-4: Topography of the site area

4.5 GEOLOGY AND SOILS

The site is underlain by sediments from the Langebaan, Varswater and Elandsfontein Formations, these sediments overly the Cape Granite Suite non-conformably. The shallow soil profile comprises calcareous sands with hardpan calcrete bands to depths of 15m.

The site is underlain by the Late Cenozoic Sandveld Group. The Sandveld Group is divided into six formations. These are, from youngest to oldest, the Witzand Formation, Springfontein Formation, Langebaan Formation, Velddrift Formation, Varswater Formation (subdivided into the Muishond Fontein Member, Langeberg Member, Konings Vlei Member, Langeenheid Member), and the Elandsfontein Formation.

The Langebaan Formation consists of a succession of pale-buff, calcareous aeolian (wind-blown) sands that can reach a thickness of up to 60m. These deposits are primarily composed of quartzose sands interspersed with marine bioclasts, indicative of a coastal dune environment.

The Witzand Formation consists of Aeolian, fine- to medium – grained, calcareous, cross-stratified sand and is of Holocene age.

The site area is comprised of the Hb land type (Land Type Survey Staff, 1972-2002). Hb land types are characterised by deep grey sands sub dominant which comprise >20% of land type.

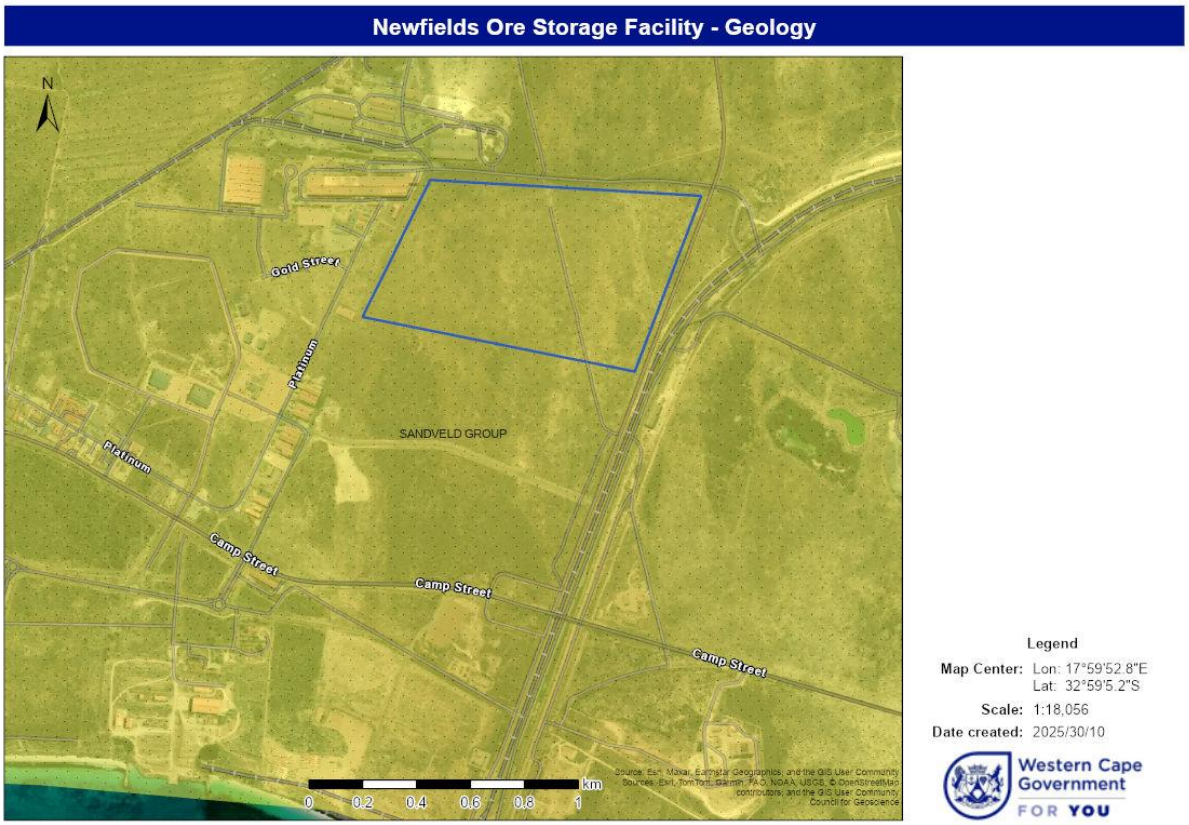

Figure 4-5: Geology

4.6 PALAEONTOLOGY, ARCHAEOLOGY AND HERITAGE

According to the Paleontological (fossil) Sensitivity Map, the majority of the areas is situated in an area which has high sensitivity underlying the study area; the DFFE screening report indicates a very high sensitivity for paleontology, archeology and heritage.

The area is underlain by the Late Cenozoic Sandveld Group. The Sandveld Group is divided into six formations. These are, from youngest to oldest, the Witzand Formation, Springfontein Formation, Langebaan Formation, Velddrift Formation, Varswater Formation (subdivided into the Muishond Fontein Member, Langeberg Member, Konings Vlei Member, Langeenheid Member), and the Elandsfontein Formation.

The Langebaan Formation is associated with several palaeontological and archaeological sites in the greater area of the West Coast.

The Langebaan Formation is not highly fossiliferous, but the fossils that has been found in this formation has proven to be valuable to gain information on Quaternary faunas, and archaeology.

These beds are fossiliferous, with large and small mammal bones, birds, reptiles, amphibians, freshwater gastropods, ostracods and middle stone age artefacts (Avery & Klein, 2009). Most of these fossils have been found in context with palaeo surfaces.

The Witzand Formation is named after the Witzand Homestead, which is about 40km North of Cape Town. This formation forms the youngest of the Cenozoic Sandveld Group.

The Witzand Formation consists of Aeolian, fine- to medium – grained, calcareous, cross-stratified sand and is of Holocene age. This formation is rated as moderately palaeontologically sensitive. In Holocene dunes most of the fossil accumulation of bone or shell material found are found in an archeological context.

The West Coast of South Africa forms a very sensitive archaeological landscape. Archaeological resources known from the area include Early, Middle and Late Stone Age resources, as well as archaeology associated with more recent colonial settlement of the area.

A potential gravesite identified by Halkett (2011) falls within the proposed development area (SAHRIS NID 75373). It is a possible grave marked by a pile of Calcrete pebbles and has been graded as IIIb.

4.7 TERRESTRIAL BIODIVERSITY

4.7.1 VEGETATION AND ECOSYSTEMS

According to Mucina and Rutherford (2006, 2009) the storage and handling facility is located ~~largely~~ within the Saldanha Flats Strandveld unit, within the Fynbos Biome. The conveyor route falls within the Saldanha Limestone Strandveld and Langebaan Dune Strandveld ~~as well as the developed portion of the Port of Saldanha~~, The Saldanha Flats Strandveld has a conservation status of Endangered.

The site falls within an Endangered ecosystem, namely Saldanha Flats Strandveld, in accordance with the list of threatened ecosystems published per the National Environmental Management: Biodiversity Act 2004. An Endangered status is indicative of having lost significant amounts (more than 60 % lost) of their original natural habitat, so their functioning is compromised.

According the Terrestrial Biodiversity Scoping Report the site and proposed footprint represent a small fraction of the overall original extent of the Strandveld, where most of the loss can be associated with historical agriculture and urban expansion. Furthermore, the remnant habitat represented within the footprint also represents a fraction of the remaining extent of the represented units, thus likely that the loss associated with the proposed activity will not have significant regional implications.

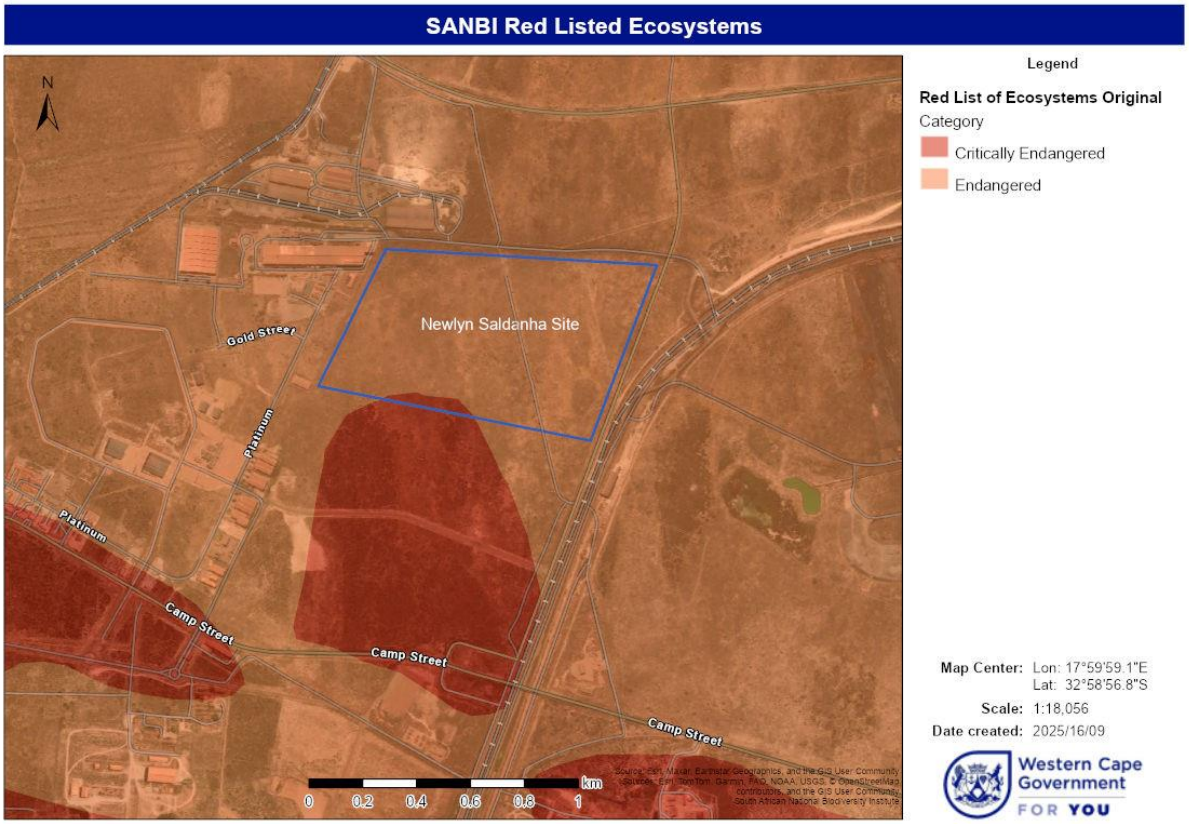

Figure 4-6: SANBI Red Listed Ecosystems

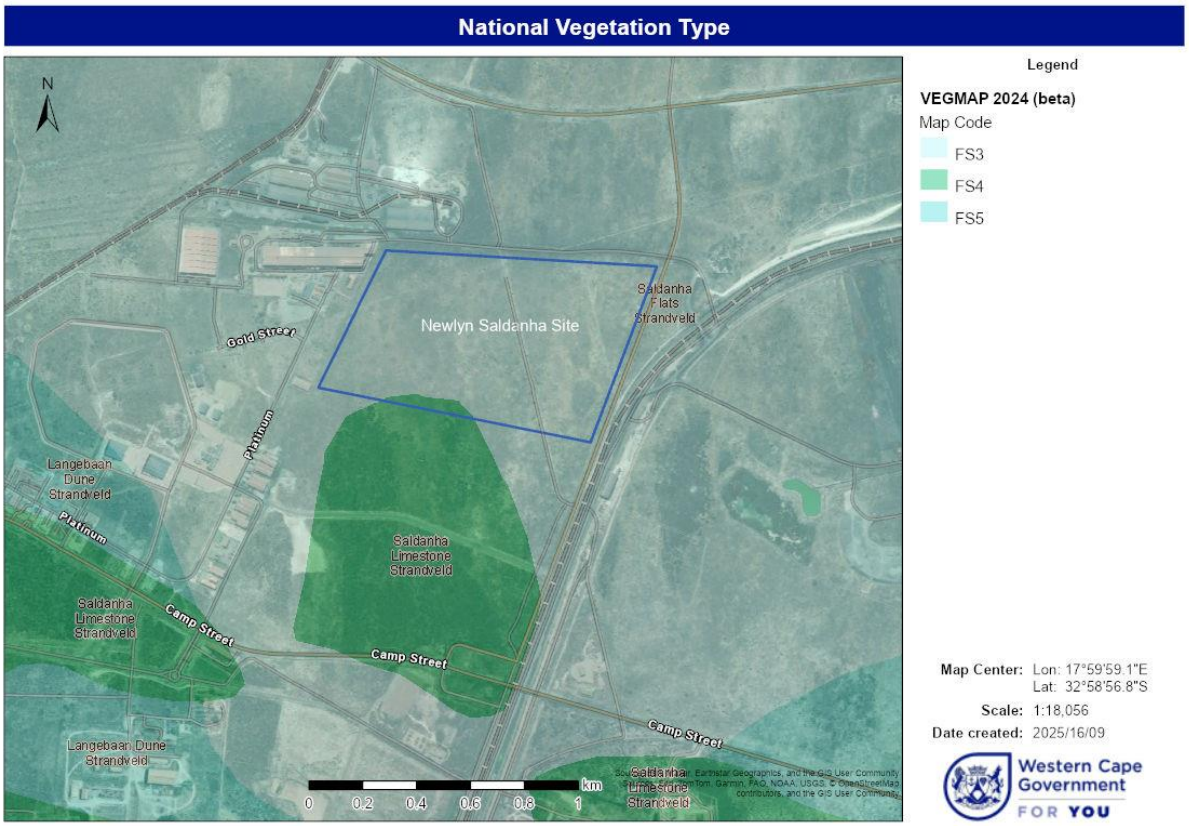

Figure 4-7: National Vegetation Types

4.7.2 WESTERN CAPE BIODIVERSITY SPATIAL PLAN

The Biodiversity Spatial Plan indicates areas of land as well as aquatic features which must to be safeguarded in their natural state if biodiversity is to persist and ecosystems are to continue functioning.

Critical Biodiversity Area (CBAs) include critically endangered habitats, ecological process areas, ecological corridors, habitats for species of special concern and some threatened ecosystems.

Critical Biodiversity Areas (CBAs) are areas that are required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure.

These include:

- All areas required to meet biodiversity pattern (e.g. species, ecosystems) targets;
- Critically Endangered (CR) ecosystems (terrestrial, wetland and river types);
- All areas required to meet ecological infrastructure targets, which are aimed at ensuring the continued existence and functioning of ecosystems and delivery of essential ecosystem services; and
- Ecological corridors to maintain landscape connectivity.

In terms of the WC Biodiversity Spatial Plan (BSP), 2023, the site is located within a terrestrial critical biodiversity area (CBA) 1 and 2 (degraded).

The desired management objective for a CBA 1 is to maintain in a natural or near-natural state, with no further loss of habitat. The desired management objective for a CBA 2 is to maintain in a functional, natural, or near-natural state, with no further loss of habitat.

In addition, Ecological Support Areas (ESAs) are also designated, which comprise supporting zones required to prevent the degradation of Critical Biodiversity Areas and Protected Areas. An ESA may be an ecological process area that connects and therefore sustains Critical Biodiversity Areas or a terrestrial feature. Small fragments of designated ESA 2 are present, associated with adjacent designated CBA features (Pote, J. 2025)

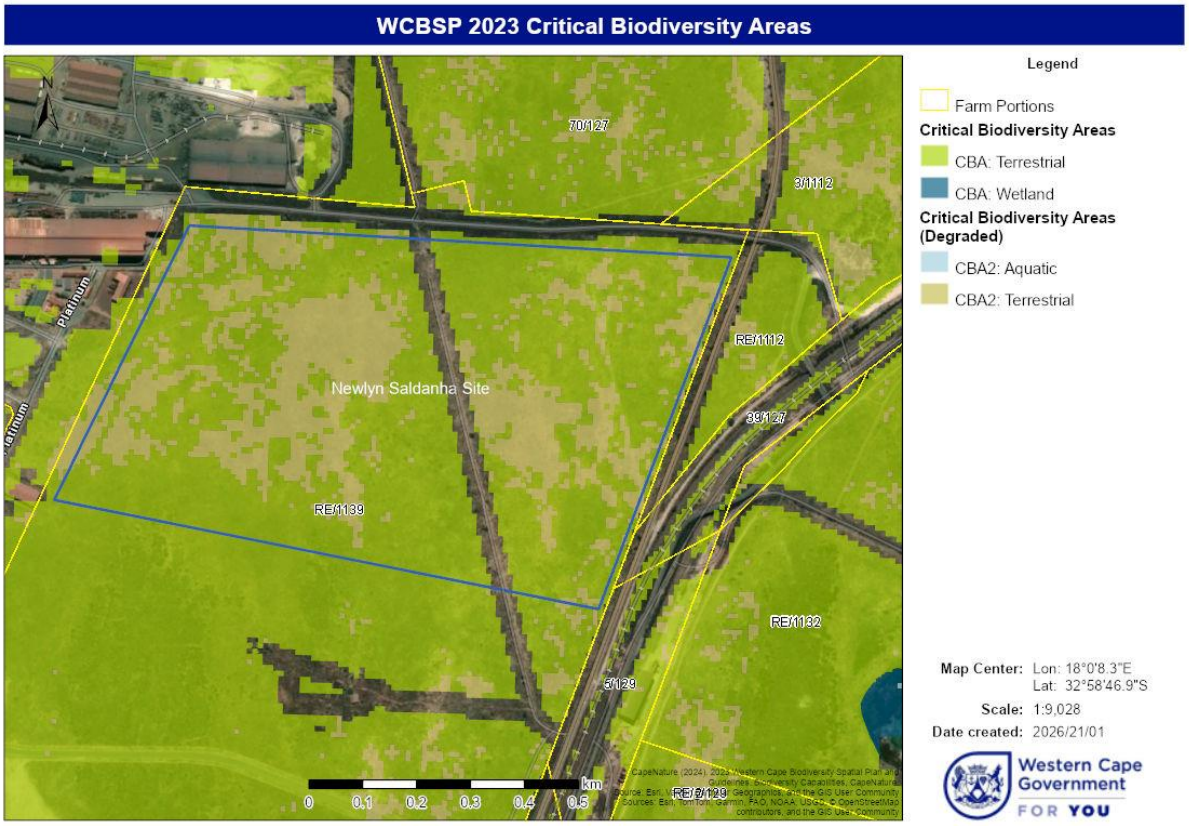

Figure 4-8: Critical Biodiversity Areas as mapped by the Western Cape Biodiversity Spatial Plan (2023)

4.7.3 WESTERN CAPE EMF

The Environmental Management Framework (EMF, 2021) identified five Environmental Management Zones (EMZ) based on a combination of the biophysical and socio-economic attributes and the potential for significant impacts in relation to the activities listed in the 2014 EIA Regulations. The EMZs comprise of two conservation focused zones and three development focused zones.

In terms of the Saldanha Bay Environmental Management Framework, the proposed site falls within the 'Offset Required' Environmental Management Zone (EMZ 1).

According to the EMF the limit of acceptable change for an EMZ 1 is:

"No loss of ecosystem functioning to a point where conservation targets are compromised. No development should be allowed in any sensitive and protected areas (i.e. within the Conservation Zone). Low impact development that results in minimal loss of habitat may be allowed on condition that the ecosystem is not compromised in any way. No high impact development should be allowed."

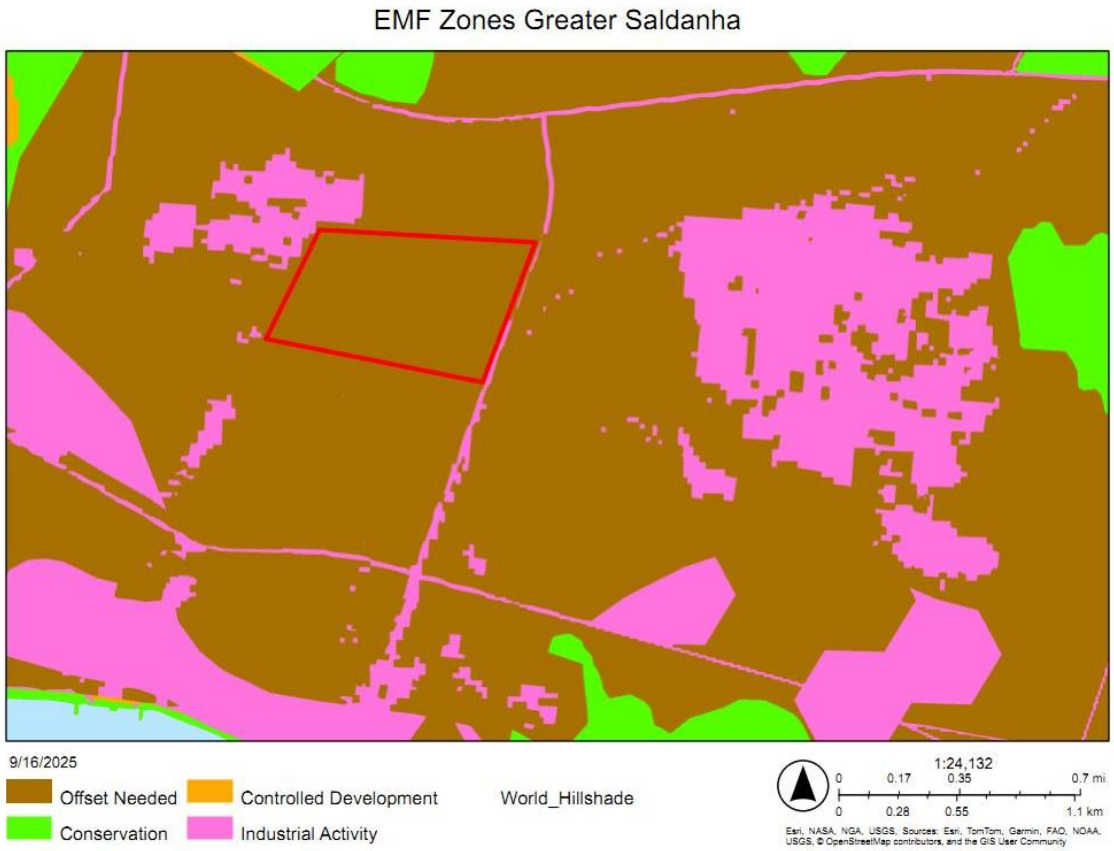

Figure 4-9: Environmental Management Zones as mapped by the Environmental Management Framework for the Greater Saldanha Area, 2021

4.7.4 SPECIES OF CONSERVATION CONCERN

The Screening Tool Report (STR) assigned a Medium Sensitivity to the plant species theme due to several flora species being flagged based on potential distributions. These include red-listed flora that occur wither in the surrounding area and/or the represented vegetation units(s) that are known to have limited distributions and or are under threat of extinction.

The STR lists 68 species, which is comprised of three (3) Critically Endangered, 15 Endangered, and 50 Vulnerable species.

The site verification and field survey visit was undertaken in the optimum season after favourable seasonal rainfall and during the flowering season. No Species of Conservation Concern (SCC) were found within the site

footprint, although several species have confirmed localities in the vicinity of the site. This is also likely a supportive indication that the site was historically transformed and is secondary and/or disturbed vegetation (Pote, 2025).

4.8 FAUNA

Saldanha falls within the Cape Floristic Region, which in general has high faunal diversity including both vertebrates and invertebrates. The DFFE screening tool indicates a very high sensitivity for fauna species, mostly due to bird species.

The project site is moderately to significantly disturbed although retains significant elements of its natural vegetation, especially along the routes of the conveyor and incoming/outgoing rail that fall outside of the main site area (Colville & Cohen, 2025).

The high sensitivity rating for fauna species can be attributed to bird species of conservation concern, mainly the Black Harrier (*Circus maurus*), the African Marsh Harrier (*Circus ranivorus*), the Secretarybird (*Sagittarius serpentarius*), the Southern Black Korhaan (*Afrotis afra*), the Lanner Falcon (*Falco biarmicus*), and the Martial Eagle (*Polemaetus bellicosus*). Insects Species of Conservation Concern noted by the STR is the Bladder grasshopper (*Bullacris obliqua*).

The site area falls within the geographic distributions of the Bladder grasshopper and the project site offers suitable habitat in parts. However, considering the wide distributional range of the species, occurring across several different vegetation types, the project impact on the Bladder grasshopper would likely be low (Colville & Cohen, 2025).

The proposed site represents potential foraging habitat, but not likely breeding habitat for the Black Harrier. The Secretarybird may occur at the proposed site considering the high density of potential prey; however, due to the high levels of disturbance from nearby industrial activities relative to the site, the site is considered to be a low priority area for the species (Colville & Cohen, 2025).

4.9 PROTECTED AREAS

The proposed development is not situated within a Protected Area (PA).

The West Coast National Park, established in 1985, is situated approximately 7 km to the south of the site and approximately 3.6 km to the north-west(Figure 4-10). It is approximately 20 000 ha in extent and incorporates terrestrial and marine ecosystems including the Langebaan Lagoon, Malgas, Jutten, Marcus and Shaapen Islands, and Postberg Private Nature Reserve.

The site is situated within the West Coast Biosphere Reserve.

The military-owned SAS Saldanha Nature Reserve is a contractual nature reserve located to the west of the site, on the opposite side of the bay. The reserve has limited access and consists of endemic habitats such as Saldanha Granite Strandveld, dwarf coastal forest and inland salt pans.

SBLM is located within the West Strandveld Bioregion and includes seven different vegetation types with biodiversity sensitivities ranging from Least Concern to Critically Endangered. Conservation areas within the SBLM include the West Coast National Park, SAS Saldanha Nature Reserve, and five Marine Protected Areas (MPA).

The MPAs, declared under the Marine Living Resources Act (Act 18 of 1998), include Malgas Island MPA, Marcus Island MPA, Jutten Island MPA, Langebaan Lagoon MPA, and Sixteen Mile Beach MPA. The Langebaan Lagoon, including Malgas Island, Marcus Island and Jutten Island, was declared a Ramsar Site, especially as Waterfowl Habitat in April 1988. The Ramsar site measures 6 000 ha.

MPAs play an important role in ensuring sustainable use of marine resources and serve to protect habitats, breeding stocks and nursery grounds, and these in turn, assist in replenishing fish resources in adjacent exploited areas ensuring conservation of biodiversity and also the sustainability of the fishing industry (Maree & Vromans, 2010).

The site is thus within 10 km of a National Park but not within 5 km of any Nature Reserve, with respect to the NEMA EIA listed activities. Development of the site is unlikely to pose any significant direct, indirect or cumulative risk to nearby protected areas, although it could potentially provide disjunct or fragmented habitat for flora and fauna species that are represented in the nearby protected areas. Due to the limited footprint of the site and activity, it is not anticipated to pose any significant risk to nearby protected areas and is also within a designated industrial area (Terrestrial, J. Pote, 2025)

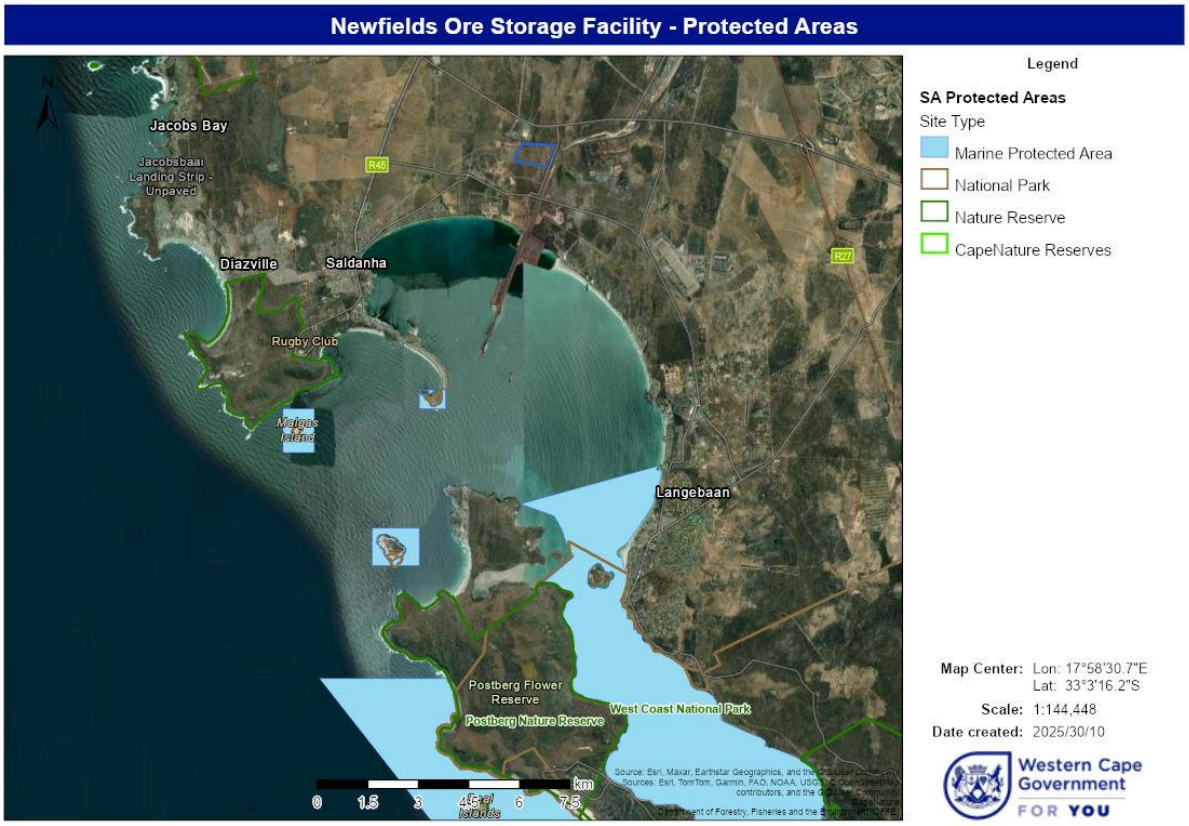

Figure 4-10: Protected Areas

Table 4-2: List of Protected Areas in the Vicinity

Name	Distance
West Coast National Park (Marcus Island)	3.8km
West Coast National Park SAS Saldanha Provincial NR. Jutten Island MPA, Langebaan Lagoon MPA, Malgas Island MPA, Marcus Island MPA, Postberg NR	8km
Sixteen Mile Beach MPA, Columbine NR, Yzerfontein Local NR, Dassen Island Provincial NR, Jacob's Rock Provincial NR, Langebaan Nature Area, Paternoster Rocks Provincial NR, Vondeling Island Provincial NR, Groot Paternoster Private NR, Sonquas Fontein Wildlife Private NR, Swartriet Private NR, West Point Private NR, Jakkalsfontein Private NR, Hopefield Private NR, Cape Canyon MPA, Rocher Pan MPA	10-50km

4.10 SURFACE WATER, GROUNDWATER AND AQUATIC SYSTEMS

The site is located within quaternary catchment G10W, in the Breed-Olifants Water Management Area. Mean annual precipitation is estimated at 295.5 mm/annum. In terms of the DFFE screening tool report, the aquatic

sensitivity of the site is low. The site is located within a sub quaternary catchment prioritized for wetland rehabilitation.

The aquifer type is mapped as intergranular and fractured with a yield of 0.0-0.1 l/s.

In terms of the 1: 50 000 topographical map, there are no known watercourses on or within 100 meters of the project area.

An aquatic assessment was conducted by Dr Brian Michael Colloty. No drainage systems associated with the nearby Bok River are associated with the site, and confirmed during the site visit. Therefore it is unlikely that the proposed project would impact on any surface water areas, and consequently no impact is anticipated on the ground water resource, with proper stormwater management in place.

The Aquatic Assessment indicated that no natural freshwater aquatic features were observed within the site, and only the artificial wetland on the adjoining property to the east was observed. The proposed development is within the 500m regulated area of the man-made pond. The comments received from DEADP on the Notice of Intent (NOI) submission indicated that a Water Use License would not be required, however, the Department of Water and Sanitation (DWS) must be consulted.

No endemic or conservation worthy aquatic species (Listed or Protected) were observed but due to lack of any connectivity between the proposed site and the artificial systems it is unlikely that they could occur.

Figure 4-11 Wetlands identified close to the site

4.11 LAND USE AND LANDCOVER

Agricultural activities took place previously within the study area. The Newfields Storage Facility falls within the Besaansklip Industrial Zone (Saldanha Bay Municipal Spatial Development Framework).The site area is currently vacant and undeveloped except for the end portion of the conveyor falling within the developed areas of the Port of Saldanha.

Rail and electrical infrastructure falls adjacent to the eastern portion of the property.

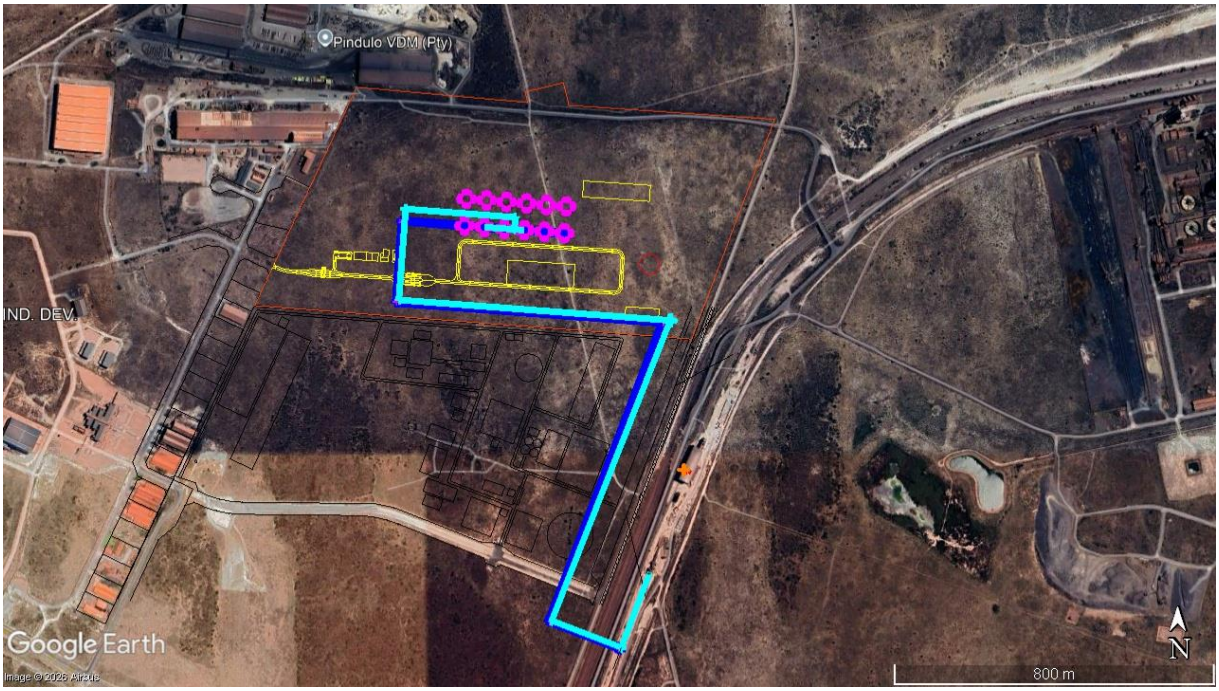

Figure 4-12: The proposed site

Landcover mapped for the site is primarily low shrubland, which is represented on site.

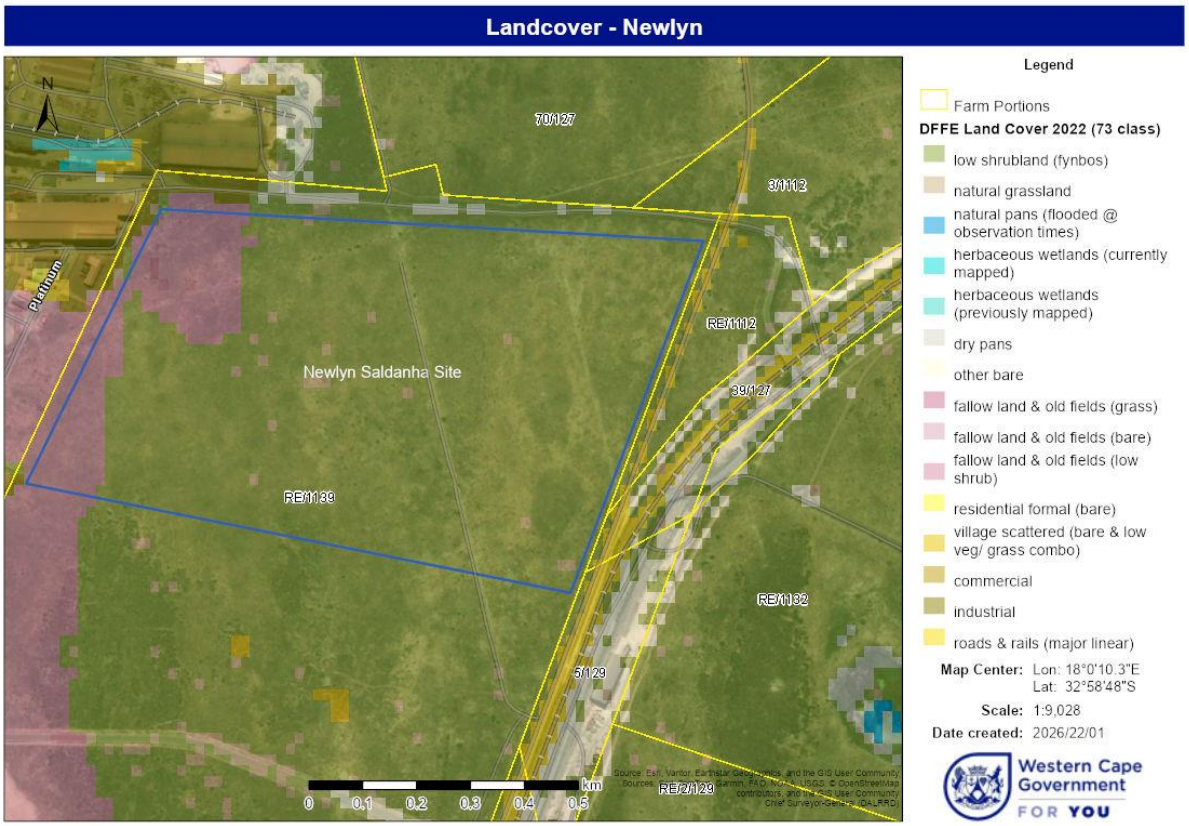

Figure 4-13: Landcover for the proposed site

4.12 REGIONAL SOCIO-ECONOMIC STRUCTURE

The West coast district is divided into five local municipalities which are described in the following:

- Matzikama Local Municipality

- Cederberg Local Municipality
- Bergrivier Local Municipality
- Saldanha Bay Local Municipality
- Swartland Local Municipality.

Saldanha Bay is the second most populated municipality on the West Coast. The 2024 population of Saldanha Bay Municipality is estimated at 130 530 with an annual growth rate of around 1.6%. The SBM has a total of 40 872 households. The latest available data showing that 73.7 per cent of Saldanha Bay's population remains below the poverty line as of 2023.

In 2023, the Saldanha Bay municipal area recorded a Gross Domestic Product (GDPR) of R9.345 billion. The Port of Saldanha plays a pivotal role in the municipal area's transport sector, facilitating substantial activities related to the export of coal, iron ore, manganese, zinc, and lead. Operations at the port, combined with the advantages provided by the Saldanha Bay Industrial Development Zone (IDZ), position the area attractively for new investments, fostering job creation.

The 2012 National Infrastructure Plan targets Greater Saldanha for the roll-out of SIPs. SIP 5 involves the development of the Saldanha-Northern Cape corridor through rail and port expansion and increasing back-of-port industrial capacity in Saldanha Bay by the development of an IDZ for minerals beneficiation and servicing the African maritime oil and gas sector (Western Cape Government, 2016). The IDZ has attracted more than R21-billion of private investment to date (Arnoldi, 2021).

The Port in Saldanha Bay is of national importance as a mineral and industrial export terminal and marine services hub. The export harbour is an important logistical component of the regional economy, facilitating the export of regionally products. Crude oil is imported via the port with an LPG import terminal commissioned 2017 which provides LPG distribution potential throughout sub-Saharan Africa. The bay also hosts important fishing and expanding aquaculture industries and is the biggest supplier of oysters and mussels in South Africa.

5 CHAPTER 5: PROJECT ALTERNATIVES

5.1 INTRODUCTION

Alternatives are different means of meeting the general purpose and need of a proposed activity. Alternatives may include location or site alternatives, activity alternatives, process or technology alternatives, temporal alternatives or the no-go alternative.

The following alternatives have been identified for consideration in the Scoping Phase and assessed in the EIA phase.

5.2 THE 'NO-GO' OPTION

The 'no-go' option entails that the proposed Newfields bulk mineral ore storage and handling facility is not developed in the area, i.e. that no development as per the proposal is undertaken and the *status quo* remains.

This option entails that mineral ore will not be stored in a manner which significantly reduces the risk of environmental pollution and contamination.

Employment opportunities created during the construction phase is anticipated to be approximately 2000 positions and for the operational phase it is anticipated to be approximately 300 positions. During the construction phase economic contributions to the local economy are anticipated, largely due to purchasing of construction materials and appointment of various contractors. During the operational phase, economic contributions to the economy will continue with the export of manganese ore. Currently South Africa exports 30% of the world's requirements for manganese ore and with the proposed development catering for new manganese ore mines; this is likely to increase the export of manganese ore, which would subsequently increase the Gross Domestic Product for the Western Cape. If the No-Go option is implemented, these socio-economic benefits will not be realised.

The proposed bulk storage and handling facility is considered to be in line with EMF, SDF and IDP for the SBMA in that the activity is located within an industrial area. However, in terms of the Saldanha Strategic Offset Strategy (SSOS), the site is located within an EMZ 1 which requires an offset where high and significant residual impacts cannot be avoided.

The 'no go' option will be used as a baseline throughout the assessment process against which potential impacts will be compared in an objective manner.

5.3 SITE ALTERNATIVES

Re/1139 is the only site considered. The southern portion of Re/1139 was briefly considered, however, the northern portion remains the preferred option. The southern portion is located within a 'Critically Endangered' ecosystem as mapped by the SANBI Red list of Ecosystems (RLE).

The site is situated close to the existing Transnet railway and siding, and close to the port terminal. AfriSam is the landowner and provides consent for the Newfields bulk mineral ore storage and handling facility.

5.4 ACTIVITY ALTERNATIVES

Two alternatives for the storage of ore have been considered.

Alternative 1 (preferred alternative) is the storage of ore in closed silos. The advantage of a closed storage system is the near zero emissions during loading procedures and during storage time. This is due to dust filtration systems at various areas in the offloading process. The silos are not open to the air and therefore not susceptible to the wind or rain.

Alternative 2 is the storage of ore in an open stockpile yard with stacker-reclaimers. The disadvantages of open storage relate to the dust generated from loading procedures as well as during storage due to high winds. A further disadvantage is that the stockpiles would require regular dust suppression with water. This alternative

has been dismissed due to the significant impacts associated with open stockpiles, and that Newfields has opted for the best environmental option for storage in closed silos.

5.5 OPERATIONAL ALTERNATIVES

Silos will be provided for storage; conveyors between the siding and the silos and silos to the terminal will be enclosed.

Two alternatives for the type of conveyor have been considered. Alternative 1 (preferred alternative) is a closed belt conveyor, which is enclosed in a housing. The closed conveyor limits the dust emissions to near zero and would contain any ore that may spill should the belt conveyor breakdown.

The second alternative would have been an open belt conveyor where the belt is not enclosed in housing, i.e. open to the air. However given Newfields's objective to establish a near zero emission complete solution, this is not an option for further consideration. The open conveyor system is likely to generate dust emissions whilst the ore is being transported from either the rail wagons to the silos or from the silos to the ship loaders. In the event of breakdowns and during normal operations, the risk of the spillage of ore is higher with an open conveyor system.

5.6 SITE LAYOUT ALTERNATIVES

Alternative conveyor routes were considered. The conveyor belt of the preferred layout, Option 1, is the preferred alternative (Figure 5-1). Both layouts entail an intake conveyor accepting ore from the tippler at the existing railway line. The conveyor routes are elevated and will only require groundworks and construction for the stilts/pillars supporting the conveyor.

The alternative layout considered, Option 2 (Figure 5-1Figure 5-2), has a longer route for the conveyor lines. The conveyor route of Option 2 increases the site development footprint compared to that of Option 1.

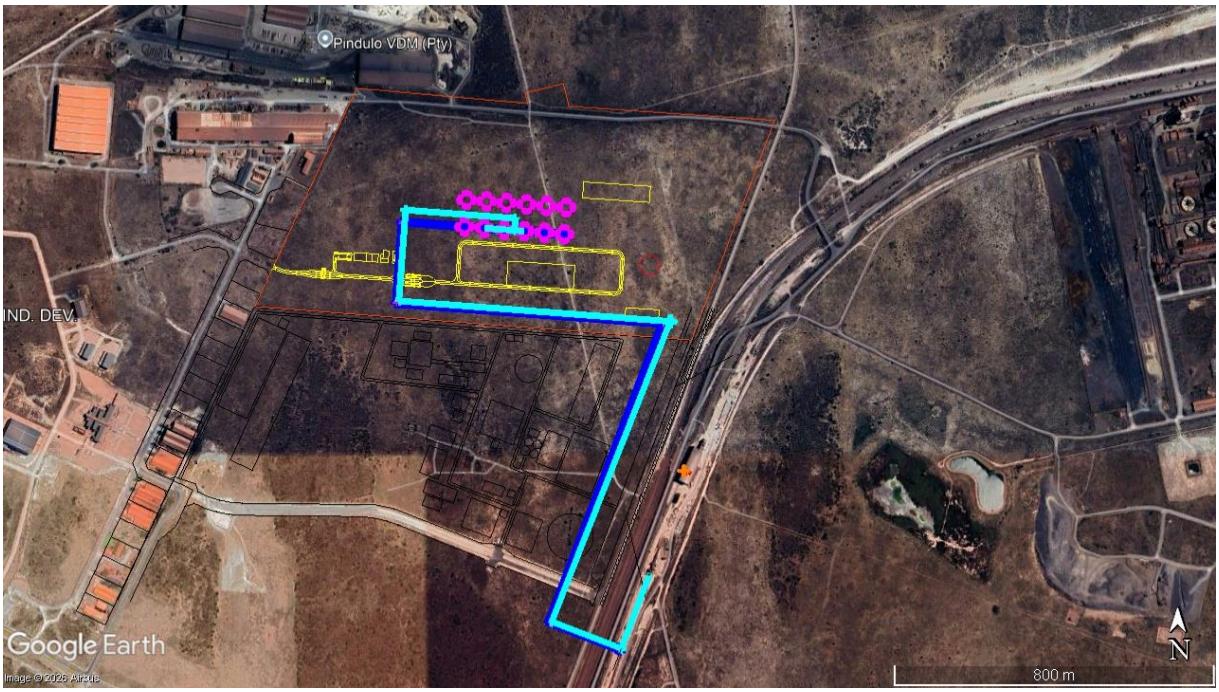

Figure 5-1: Alternative route layout Option 2 (Preferred Alternative)

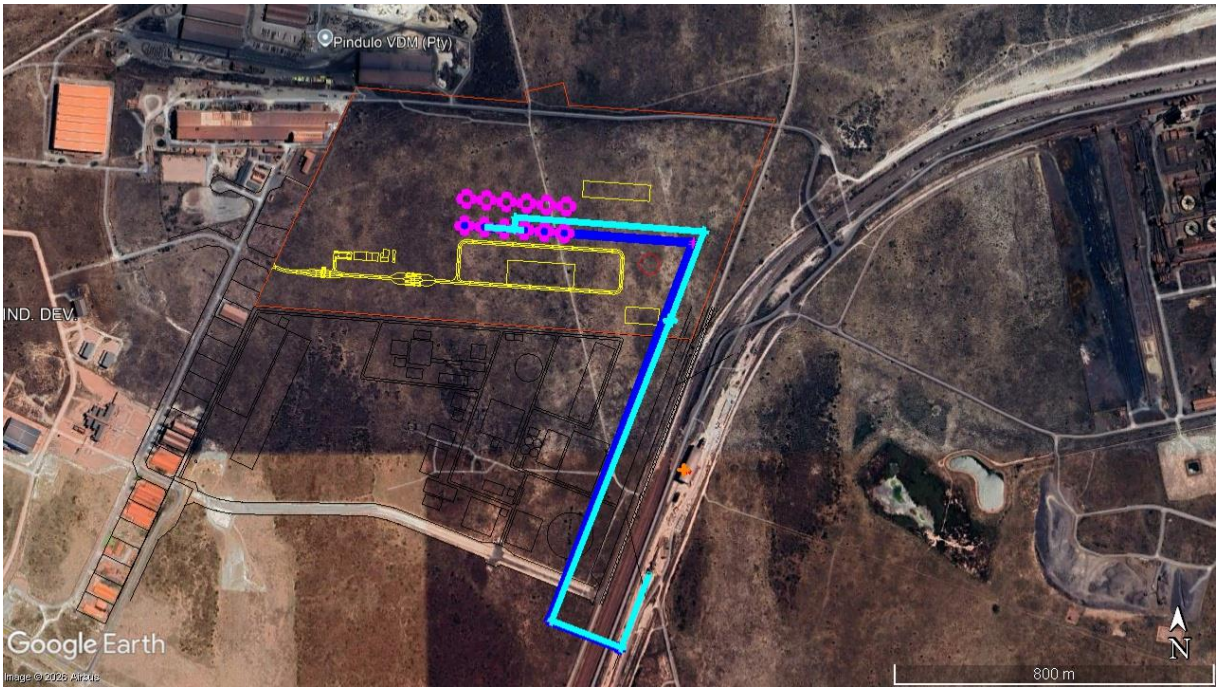

Figure 5-2: Alternative route layout Option 1

5.7 IDENTIFICATION OF PREFERRED ALTERNATIVES

The following attributes were used in the identification of the preferred alternatives and related positive and negative aspects: Geographical, Physical, Biological, Social, Economic, Heritage and Cultural.

The site development plan should consider sensitive heritage resources on site and critically endangered vegetation. The site is within a CBA and vegetation on the majority of the site is endangered, with a small section being critically endangered. The project site falls within the Besaansklip Industrial Zone and within a spatial category that is required to have a biodiversity offset if developed, based on the 2020 Saldanha Industrial Corridor Strategic Offsets Strategy (SSOs) (Department of Environmental Affairs and Development Planning, 2020).

It would appear that the site is not fatally flawed from consideration for development.

A summary of the positive and negative aspects for the alternatives is provided in Table 5-1)

Table 5-1: Positive and Negative Aspects for Alternatives

Alternative	Positive	Negative
Alternative Route Options (i.e. Outgoing Conveyor Route)		
Alternative Route Option 2 (Preferred alternative) :	Silos avoids the Critically Endangered Red Listed Ecosystem	A portion of the conveyor is located within a Critically Endangered Red Listed Ecosystem
	Port conveyor is located in previously disturbed and already developed area.	

Alternative Route Option 2:	Silos avoids the Critically Endangered Red Listed Ecosystems	A portion of the conveyor is located within a Critically Endangered Red Listed Ecosystem
Technical Alternatives for Conveyors		
Alternative 1: Closed Belt Conveyor	Enclosed in housing	-
	Limited to near zero dust emissions and associated health risks	-
	Contain any spillages	-
Alternative 2: Open Belt Conveyor (Dismissed)	-	Open to air
	-	Dust emissions and higher health risks
	-	Higher risk of spillage into environment
Storage Alternatives		
Alternative 1: Storage in silos	Near zero emissions and associated health risks	-
	No watering for dust suppression required	-
Alternative 2: Open Stockpiles (Dismissed)	-	Dust generated from stockpiles and higher health risks
	-	Dust suppression with water required

As a result of the above, the preferred alternatives are:

- At this stage the identified preferred alternative is Conveyor Alternative Route Option 1 (Conveyor belt avoids the Red Listed Critical Ecosystem).
- Technical Alternative : Closed Belt Conveyor
- Storage Alternative : Storage in silos
- Site Alternative: Northern portion of Farm Portion RE/1139

6 CHAPTER 6: POTENTIAL ISSUES AND ENVIRONMENTAL IMPACTS

The following section describes the methodology followed in deriving and assessing impacts; identifying and comparing alternatives; and in ensuring the Scoping Report is in accordance with legislated requirements.

6.1 PROJECT-SPECIFIC METHODOLOGY

The aim of this Scoping Report is to identify, record and describe the issues that need to be addressed in the EIA Phase. It provides a framework for the assessment of the impacts that the proposed project will have on the environment, and of the impacts the environment will have on the proposed project. The identification of the potential impacts of an activity on the environment should include impacts that may occur during the commencement, operation and termination of an activity.

These potential issues and impacts are identified by the following means:

- Professional experience of the EAP.
- Observations made during site visits: A preliminary site visit was undertaken on 15 October 2025..
- Analysis of spatial data and environmental planning guidelines
- Issues raised by stakeholders, Interested and Affected Parties as well as specialists.
- Determination of current environmental conditions for a baseline against which impacts can be identified and measured.
- Determination of future changes to the environment that will occur if the proposed activity does not take place.
- Understanding the activity in order to understand its consequences and thereby also the identification of related significant impacts

In addition to the above methods, the following aspects have been considered for the identification of impacts, as per Appendix 2 of the EIA Regulations, 2014 as amended:

- Nature: A description of the identified impact.
- Significance: The level of the impact, i.e. no impact or very low, low significance, medium significance or high significance.
- Consequence: Negative or positive consequence on the environment.
- Extent: The spatial scale of the impact, whether this is limited to the immediate areas or site of the development activity or will the impact occur on a sub-regional, regional and/or national scale
- Duration: The anticipated time scale of the impact: Construction Phase and/or Operational Phase.
- Probability: The probability of the impact actually occurring as either improbable (low likelihood); probable (distinct possibility); highly probable (most likely) or definite (impact will occur regardless of preventative measures).
- Mitigation: Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated.

The following environmental (biophysical, socio-economic and cultural-historic) issues have been identified and will be assessed during the EIA phase.

6.2 IDENTIFIED IMPACTS

6.2.1 Impact on Air Quality

Nature: The Newfields bulk mineral ore storage and handling facility will initially handle 8 million tons of manganese ore per annum which exceeds the threshold limit of 100 000 tons per annum, above which Atmospheric Emissions Licences (AELs) are required for such large facilities. No specific emission limits are set for such operations, but dust fall-out from the facility operations may not exceed the limit value for adjacent land according to the dust control regulations promulgated in terms of Section 32 of the National Environment Management: Air Quality Act (2004) (NEM:AQA) in the

eight principal wind directions. The emphasis is, therefore, the potential impact of particulates that may be emitted from the Newfields bulk mineral ore storage and handling facility (Albertyn, 2025).

An AEL is thus required for the Newlyn bulk mineral ore storage and handling facility installation and an air quality impact assessment of the facility in support of an application for an AEL has been undertaken (Albertyn, 2025).

Significance	High (without mitigation) Very Low (with mitigation)
Consequence	Negative (without mitigation) Positive (with mitigation)
Extent	Site and surrounding areas
Duration	Operational Phase
Probability	Highly probable (without mitigation) Improbable (with mitigation)
Mitigation	Mitigation measures available Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.2 Impact on Terrestrial Biodiversity

The proposed Newfields bulk mineral ore storage and handling facility will be developed in an area that is currently undeveloped ~~except for the last portion of the conveyor route which is located within the physical footprint of the Port~~. The development of the Newfields bulk mineral ore storage and handling facility will result in clearance of indigenous vegetation as the infrastructure is located in currently undeveloped areas.

In terms of the Saldanha Strategic Offset Strategy (SSOS), the site is located within an EMZ 1 which requires an offset where high and significant residual impacts cannot be avoided.

Potential terrestrial biodiversity impacts that will be investigated further include:

1. Permanent or temporary loss of indigenous vegetation cover
2. Loss of flora species of Conservation Concern
3. Susceptibility of post construction disturbed areas to invasion by exotic and alien invasive species
4. Susceptibility of some areas to wind and water erosion associated with uncontrolled runoff.
5. Disturbance to ecological processes. ,

Impacts of a cumulative nature include the potential increase in habitat transformation, habitat fragmentation, and environmental degradation.

However, no cumulative impacts are expected because of the development of the site providing recommendation and mitigation measures are adhered to, due to the limited size of the site footprint relative to the remaining extent of the vegetation unit (Pote, 2025). Impacts will be assessed further in the EIR.

Significance	High
Consequence	Negative
Extent	Site and surrounding areas
Duration	Construction and Operational Phase (Medium Term)
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.3 Impact on Landscape / Visual

Any change in a local view through the introduction of new infrastructure in the line-of-sight of a viewer can be considered a visual impact. Visual impacts are subjective and usually considered most significant when the development is dissimilar to other developments in the area, is readily viewed from areas of public access, such as paths, roads and viewpoints, or is placed in areas which are characterised by significant natural features.

The proposed Newfields bulk mineral ore storage and handling facility will be located within the Besaansklip Industrial Area where changes to the landscape and visual aspects are already anticipated.

The proposed facility could cause visual impacts through the transformation of undeveloped areas.

Significance	Medium
Consequence	Negative
Extent	Site and surrounding areas
Duration	Construction and Operational Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.4 Impact on Heritage Resources

Potential impacts related to heritage resources may include the possible loss of cultural heritage resources, including archaeological and paleontological artefacts.

A Palaeontological Assessment was conducted and will be utilized to assess impacts in the EIA. A Heritage Screener was conducted and a Notice of Intent to Develop (NID) was submitted to Heritage Western Cape (HWC) in terms of Section 38 of the National Heritage Resources Act (NHRA). In response to the NID, HWC requested a full Heritage Impact Assessment to be conducted. The full HIA will assess impacts on Heritage resources in the EIA.

A potential gravesite identified by Halkett (2011) falls within the proposed development area (SAHRIS NID 75373). It is a possible grave marked by a pile of Calcrete pebbles and has been graded as IIIb.

Significance	Medium
Consequence	Negative
Extent	Site
Duration	Construction Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.5 Impact on Traffic

The proposed development will accept delivery of ore from the Northern Cape mines by means of rail. On arrival at the site, the ore will be offloaded form the rain wagons directly onto a conveyor from Tippler 3 and then deposited into a storage silo. The ore will then be delivered to the Port of Saldanha dry bulk terminal by means of a closed conveyor system.

There will thus be no truck traffic operating between the site and the Northern Cape, nor between the site and the Port.

Traffic impacts would increase during construction however it is expected that this would be limited to the construction phase. Approximately 20 vehicles per day will access the storage site during the operational phase.

An access road will be required for access to the storage site, and along the conveyor rout for construction and maintenance purposes. Access to the storage site is proposed to be gained from Platinum Road at a point opposite Gold Street. The cadastral layout in this area provides for access at this point to the site. It is anticipated that the conveyor access road will be located adjacent to the conveyor route.

Significance	Medium to low
Consequence	Negative
Extent	Site and surrounding areas
Duration	Construction and Operational Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.6 Impact on Health

Potential health impacts relate to the ore dust that may escape into the environment from breakdowns at the silos or along the conveyor route. During construction potential impacts on public health, safety and security impacts will be considered.

Significance	Medium
Consequence	Negative
Extent	Site and surrounding areas to wider region
Duration	Construction and Operational Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.7 Waste Impacts

Impacts relating to ineffective waste management procedures may lead to the dumping of building rubble, littering and pollution of the surrounding areas as well as unsanitary (toilet) conditions. Construction waste will increase the amount of waste disposed to landfill, including cleared vegetation. Excavated material that will not be used in the construction works, should be used as fill material before the option of disposing the material to landfill is undertaken.

During operation, waste impacts relate to waste from the office building and waste from the workshops (locomotives, machine and electrical). All dust captured in the dust extraction systems will be added to the silo storage via a conveyor feed, and will not be disposed of as waste.

Significance	Medium
Consequence	Negative
Extent	Site and surrounding areas
Duration	Construction and Operational Phase
Probability	Probable

Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.8 Socio-Economic Impacts

Potential impacts on employment opportunities during the construction and operational phase

Significance	Medium
Consequence	Positive
Extent	Surrounding and regional areas
Duration	Construction and Operational Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

Health and safety impacts associated with increased traffic during construction as well as increased criminal activity in the vicinity of the proposed development.

Significance	Medium
Consequence	Negative
Extent	Site and surrounding areas
Duration	Construction Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

Contribution to local, provincial, and national economic activity and socio-economic development. The proposed development is almost certain to make a long-term positive contribution to economic activity and socio-economic development.

Significance	High
Consequence	Positive
Extent	Local, regional and national.
Duration	Construction and Operational Phase
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.2.9 Impact on Climate Change

Climate change has become an environmental concern, especially with regard to emission and greenhouse gasses on projects of a similar nature. Considering that the proposed project aims to develop an enclosed bulk store terminal and

handling facility for ore which will mitigate negative cumulative impacts of dust fallout on the natural and social environment in the area, the anticipated climate change related impacts are anticipated to be low.

Significance	Low
Consequence	Negative
Extent	Site
Duration	Construction and operational
Probability	Probable
Mitigation	Mitigation measures to be considered Degree to which these impacts can be reversed, cause irreplaceable loss of resources and can be avoided, managed or mitigated

6.3 AFFIRMATION BY EAP

I, Irma van der Merwe of CEN IEM UNIT, the independent Environmental Assessment Practitioner (EAP) responsible for compiling the Scoping Report, hereby affirm the following in accordance with the requirements of the EIA Regulations, 2014 as amended:

a) To the best of my knowledge, the information on the proposed development as included in this Scoping Report is correct.
b) Comments and inputs from stakeholders and Interested and Affected Parties I&APs) will be included and considered within the Scoping Report.
c) Inputs and recommendations from the specialist reports, where relevant; have been included within this Scoping Report.
d) Correspondence with the EAP and I&APs during the public participation process undertaken by CEN IEM Unit to date, is included in this Scoping Report. This correspondence includes information provided to I&APs and any responses by the EAP to comments or inputs made by I&APs.

6.4 ASSUMPTIONS, UNCERTAINTIES AND GAPS IN KNOWLEDGE

The following assumptions, uncertainties and gaps in knowledge were identified for this process to date:

6.4.1 Scoping and EIA Process

The EIA process is multi-disciplinary, which was informed by the project team. It is thus necessary to presume that the information as provided to the project team to date by external sources is accurate, appropriate and correct.

Data shown in the maps was supplied by various sources and was used after it was reviewed and verified where considered necessary. Verification was, however, restricted to available sources of information only.

The findings and recommendations from the specialist studies have been / will be considered as part of the impact assessment and mitigation measures respectively.

6.4.2 Public Participation Process

Every effort will be made to contact and provide written notification to all stakeholders and adjacent landowners within the study area. Information presented by the stakeholders is presumed to be accurate and presented timeously with respect to the process at hand.

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7 CHAPTER 7: PLAN OF STUDY

7.1 INTRODUCTION TO EIA PHASE

A Plan of Study for the EIA has been prepared according to the process as described in Appendix 2 of the EIA Regulations (2014, as amended) promulgated in terms of Section 24(5) of the NEMA, to provide the DEADP with adequate information in order to make a decision, and proceed with the proposed activity.

7.2 SPECIALIST STUDIES

7.2.1 DFFE Screening Tool

The following specialist studies were identified in the DFFE National Screening Tool:

- Agricultural Assessment
- Landscape / Visual Impact Assessment
- Archaeological and Cultural Heritage Impact Assessment
- Palaeontology Impact Assessment
- Terrestrial Biodiversity Impact Assessment, includes a Plant Species Assessment
- Animal Species Site Verification Report
- Aquatic Biodiversity Assessment
- Noise Impact Assessment
- Traffic Impact Assessment
- Health Impact Assessment
- Socio-economic Assessment
- Air Quality Impact Assessment

Sections 7.2.2. to 7.2.13 identify specialist studies which will be undertaken, with the relevant Terms of Reference.

7.2.2 Terms of Reference: Air Quality Impact Assessment

The Air Quality Impact Assessment will consider the following: Emission Source Classification, Atmospheric Emission License requirements, dispersion modeling study and impact assessment on air quality in terms of PM10 Particulate Matter and Cumulative Report. The Air Quality Impact Assessment will identify and assess any potential impacts associated with the proposed development and propose mitigation measures.

7.2.3 Terms of Reference: Terrestrial Biodiversity Impact Assessment

The terrestrial biodiversity assessment will include:

a) Survey of the fauna and flora
b) Provide a scientific description of the terrestrial ecology of the proposed development site and route.
c) Describe the potential impact of the proposed development on the site biodiversity.
d) Make recommendations on the development proposal to avoid and/or limit biodiversity impacts.
e) Devise a sensitivity map with safe and no-go areas.
f) Provide a list of threatened and protected floral and faunal species.
g) Provision of mitigation measures.

7.2.4 Terms of Reference: Aquatic Biodiversity Assessment

The scope of this study incorporates:

a) Watercourse impact assessment
b) The determination of the Present Ecological State (PES) and Ecological Importance and Sensitivity (EIS) of any waterbodies, estimating their biodiversity, conservation and ecosystem function importance with regard to ecosystem services.
c) Maps depicting demarcated aquatic vegetation delineation, GIS Shapefiles for aquatic features.
d) Risk assessment as per the DWS requirements for Section 21 (c) and (i) applications.

7.2.5 Terms of Reference: Traffic Impact Assessment

The scope of work includes the following:

a) A high level traffic report will be prepared
b) Discuss the planned development with the relevant Transportation representatives of the SBLM and SANRAL; and ensure that all issues are identified,
c) Evaluate the access arrangements and the operational functioning at the controlled entrance or exists and the traffic impact on the surrounding road network
d) Provide practical and feasible recommendations with regard to road upgrading required to serve the growth in background traffic volumes, as well as the trips that will be generated by the proposed development, given the expected impact of the development on the surrounding road network.

7.2.6 Terms of Reference: Health Impact Assessment

The scope of the Health Impact Statement would be to confirm the low risk of health impacts in relation to the preferred alternatives and air quality assessment.

a) Apply existing knowledge and evidence about health impacts, to specific social and community contexts in order to develop evidence-based recommendations that inform decision-making. This is done in order to protect and improve community health and wellbeing.
b) Describe a robust health baseline in the communities surrounding the project by means of a descriptive study.
c) Provide the required information that will allow for the health impact assessment to be in alignment with the IFC methodology for category A projects. This can then allow for the health impacts to be ranked based on the Project description and the locality of potentially impacted communities.
d) Provision of information that the Developer/ Client can consider for the development of a community health management plan that addresses the required mitigation/management measures; and
e) Determine the community health and safety baseline conditions in the area in which the human receptors are situated, including air quality, noise and nuisance considering existing industrial activities and proximity to the proposed Development, the ambient environment, existing housing stock and baseline community

7.2.7 Terms of Reference: Archaeological and Cultural Heritage Impact Statement

The scope of works includes the following:

a) Desktop review of available information and recorded sites on and surrounding project area
b) Recommendations on full impact assessments required
c) Submission of Notice of intention to develop to the Heritage Western Cape
d) Compile a respective impact assessment report based on findings.

7.2.8 Terms of Reference: Agricultural Compliance Statement

The scope of works includes the following:

a) A compliance statement must be prepared and confirm that the site is of 'low' or medium sensitivity for agriculture
b) Provide a scientific description of the soil capability, land capability, grazing capability and land use of the proposed development site and route.
c) Describe the potential impact of the proposed development on the agricultural theme.

7.2.9 Terms of Reference: Noise Impact Assessment

The scope of works includes the following:

a) Gain an understanding of the baseline noise environment at the proposed site
b) Identify no-go areas that should be avoided due to irreplaceable environmental sensitivity or irreversible environmental impact;
c) Determine and assess the impact to receptors and resources in the vicinity of the proposed site;
d) Identify and recommend mitigation measures;

e) Determine which acoustic screening measures will be required for the proposed development in order to comply with the Noise Control Regulations, 1994 and the SANS Code of practice – SANS 10103 of 2008;

7.2.10 Terms of Reference: Visual Impact Assessment

a) Collate and analyse all available secondary data relevant to the affected proposed project area. This includes a site visit of the full site extent, as well as of areas where potential impacts may occur beyond the site boundaries.
b) Specific attention is to be given to the following:
    i. Quantifying and assessing existing scenic resources/visual characteristics on, and around, the proposed site.
    ii. Evaluation and classification of the landscape in terms of sensitivity to a changing land use.
    iii. Determining viewsheds, view corridors and important viewpoints in order to assess the visual impacts of the proposed project.
    iv. Determining visual issues, including those identified in the public participation process.
    v. Reviewing the legal framework that may have implications for visual/scenic resources.
    vi. Assessing the significance of potential visual impacts resulting from the proposed project for the construction, operation and decommissioning phases of the proposed project.
    vii. Assessing the potential cumulative impacts associated with the visual impact.
    viii. Generate photomontages of the proposed landscape modification.
    ix. Identifying possible mitigation measures to reduce negative visual impacts for inclusion into the proposed project design, including input into the Environmental Management Programme report (EMPr).

7.2.11 Terms of Reference: Socio-Economic Assessment

a) Desktop review of current socio-economic environment
b) Description of baseline conditions and identify socio-economic impacts (direct, indirect, cumulative)
c) Recommendations and mitigation measures provided

7.2.12 Terms of Reference: Faunal Assessment Report

a) Conduct a desktop review of available information to determine if the animal SCC have been recorded at or near the project area and to ascertain the habitat requirements of the SCC.
b) Conduct a site visit of the project area to assess the physical and biological characteristics of the site with regards to habitat suitability for the animal SCC and identify any sensitive areas.
c) Prepare a site sensitivity verification report detailing the findings of the desktop study and site visit, confirming, or disputing the environmental sensitivity themes as identified by the screening tool
d) Terrestrial Animal Species Compliance Statement or a recommendation that a Terrestrial Animal Species Specialist Assessment would be required.

7.2.13 Terms of Reference: Palaeontological Assessment

a) Provide a record of the inferred palaeontological heritage resources within the study area.
b) Recommend for palaeontological mitigation measures where it is considered necessary.
c) Survey possible paleontological sites within project area
d) Discuss range and importance of possible exposed and in situ paleontological sites
e) Identify the potential impact of the development on these resources

7.2.14 Terms of Reference: Offset Study

South Africa's draft National Biodiversity Offset Guideline was published for public consultation on 25 March 2022, which sets out the requirements for the development of a Biodiversity Offset Report (BOR) in support of an application for environmental authorisation (EA).

According to the DFFE's National Biodiversity Offset Guideline: "*the proponent's EAP, or a relevant specialist or specialists, applies the mitigation hierarchy. If it is found that after all steps are taken to avoid and minimise the impact of an activity, or activities, on biodiversity, and to rehabilitate the affected area, there would still be a significant residual*

negative impact on biodiversity, an offset is required, provided that offsetting is possible under the circumstances. The need for an offset is most often only identified in the EIA phase after a report has been generated through the National Environmental Web-based Screening Tool and a site sensitivity verification report has been prepared, or when the issue has been raised by the applicant's EAP or specialist, the CA, a commenting authority or an interested or affected party".

In terms of the Saldanha Bay Environmental Management Framework, the proposed site falls within the 'Offset Required' Environmental Management Zone (EMZ 1).

The following terms of reference are required for a Biodiversity Offset Study:

- That the mitigation hierarchy, including due consideration of project alternatives to avoid or minimise impacts, has been appropriately applied before considering biodiversity offsetting.
- The degree of risk that negative residual impacts cannot be offset (i.e. negative residual impacts on irreplaceable biodiversity and/or major constraints on finding suitable biodiversity offset sites to meet the offset requirements) and how the risk is to be addressed or mitigated.
- A measure of significant residual negative biodiversity impacts which must be offset. The applicable biodiversity offset ratios for impacted ecosystems.
- Any other considerations which are relevant to determining the size and characteristics of the biodiversity offset (for example, impacts on species of conservation concern with specific habitat requirements, impacts on ecological corridors and connectivity in the landscape, and impacts on important ecological infrastructure), and how the size of offset is to be adjusted to take these considerations into account.
- An explicit statement on the required size of the biodiversity offset to remedy potential (if any) residual negative biodiversity impacts, applying the basic offset ratio and adjustments as appropriate
- The portfolio of candidate biodiversity offset sites, including the likelihood of each site's availability and feasibility.
- The required biodiversity outcomes on each of the candidate biodiversity offset sites identified in the Biodiversity Offset Report.
- The management measures that would need to be employed as part of the biodiversity offset for a defined period, for which the applicant would be responsible

7.3 IMPACT ASSESSMENT METHODOLOGY

7.3.1 The Identification of Impacts

The assessment of potential environmental impacts will be undertaken, where appropriate, in accordance of Appendix 2 of the EIA Regulations, 2014 as amended.

The impacts assessed by the specialists will be rated using the information provided in their reports.

7.3.2 Impact Assessment Criteria

The impact assessment criteria that will be used is reflected in the table below.

Table 7-1: Impact Assessment Criteria

Criteria	Description
Nature	An aspect is an element of an organisation's activities, products and services which can interact with the environment which may result in an impact. The nature of the impact is described and the significance thereof determined.
Status	
+ / - **Direct / Indirect**	This describes whether the impact is positive or negative, and whether the impact is direct or indirect in nature.
Extent	
Whether the impact will occur on a scale limited to the immediate areas, footprint or site of the development activity or	

Criteria	Description	
will the impact occur on a sub-regional (local), Regional and or national scale.		
Footprint / Site	The impact could affect the whole, or a significant portion of the site.	**1**
Local	Impact could affect the adjacent landowners and areas surrounding the site.	**2**
Regional	Impact could affect the wider area around the site, that is, from a few kilometres, up to the wider region.	**3**
National	Impact could have an effect that expands throughout a significant portion of South Africa – that is, as a minimum has an impact across provincial borders.	**4**
Duration		
Whether the lifetime of the impact will be of a short duration (0-5 years); medium term (5-15 years); long-term (15 years, with the impact ceasing after the operational life of the development); or considered permanent where mitigation either by natural process or by human intervention will not occur in such a way or in such a time span that the impact can be considered transient.		
Short Term	The impact will either disappear with mitigation or will be mitigated through a natural process, and will be relevant for 0 to 5 years.	**1**
Medium Term	The impact will be relevant for 5 to 15 years	**2**
Long Term	The impact will continue or last for the entire operational lifetime of the development, but will be mitigated by direct human action or by natural processes (more than 15 years)	**3**
Permanent	This is the only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient.	**4**
Intensity		
Whether the intensity (magnitude / size) of the impact is high, medium, low or negligible (no impact). Where possible the intensity of impacts are quantified		
Very Low	The impact alters the affected environment in such a way that the natural processes or functions are not affected	1
Low	The impact alters the affected environment in such a way that the natural processes or functions are slightly affected	**2**
Medium	The affected environment is altered, but functions and processes continue, albeit in a modified way.	**3**
High	Function or process of the affected environment is disturbed to the extent where the function or process temporarily or permanently ceases.	**4**
Reversibility		
Reversibility is the ability of the affected environment to recover from the impact. Examining whether the impacted environment can be returned to its pre-impacted state once the cause of the impact has been removed. The degree to which the impact and risk can be reversed:		
Reversible	The impact is completely reversible	**1**

Criteria	Description	
Low	The impact is reversible with mitigation measures implemented, over short term	**2**
Medium	The impact is reversible with additional mitigation measures, over medium term	**3**
Irreversible	Affected environment is unable to recover from the impact i.e. permanently modified	**4**
Replaceable		
Examining if an irreplaceable resources is impacted upon. Replaceable is an indication of the scarcity of the specific set of parameters that make up the affected environment. That is, if lost can the affected environment be (a) recreated, or (b) is it a common set of characteristics and thus if lost is not considered a significant loss. The degree to which the impact and risk may cause irreplaceable loss of resources:		
Replaceable	Affected environment is replaceable, i.e. an irreplaceable resource is not damaged or the resource is not irreplaceable / scarce.	**1**
Low	There would be a marginal loss or resources	**2**
Medium	There would be a significant loss of resources	**3**
Irreplaceable	Affected environment is irreplaceable, i.e. complete loss of all resources	**4**
Cumulative		
A cumulative impact is an impact, which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
Very Low	Negligible to no cumulative effect / impact	**1**
Low	Low cumulative effect / impact	**2**
Medium	Medium cumulative effect / impact	**3**
High	Significant cumulative effects / impacts	**4**
Probability		
The probability of the impact actually occurring as either improbable (low likelihood); probable (distinct possibility); highly probable (most Likely) or definite (impact will occur regardless of preventative measures).		
Improbable	The possibility of the impact occurring is none, due to either the circumstances design or evidence.	**1**
Probable	There is a possibility that the impact will occur to the extent that provisions must therefore be made.	**2**
Highly Probable	It is most likely that the impact will occur at some stage of the Development.	**3**
Definite	The impact will take place regardless of any prevention pans, and only mitigation actions or contingency plans to contain the effect can be relied upon	**4**
Significance		
The significance of impacts of the proposed project are assessed with the mitigation measures which will be included in the EMPr as well as with the additional mitigation measures recommended in this report being implemented. The significance of the identified impacts on the components of the affected environment are described as: **No Impact:** Where the project action will not cause any adverse or beneficial changes to the natural (biophysical), and/or		

Criteria	Description	
socio-economic environment. **Impact of Low Significance:** Where the project actions will result in minor short-term changes to the biophysical and/or socio-economic environment. The impacts will usually be restricted to the immediate area of the project action. The affected system should return to its natural or almost natural state in a short period of time (0 - 5 years). The impacts on human populations will be of a short duration and will not have any lasting consequences. **Impact of Medium Significance**: Where the project actions will result in moderate short-term or medium term changes to the biophysical and/or socio-economic environment. The effects of the impact could be experienced outside of the project action area and may be evident at a sub-regional or even a regional level. Minor indirect impacts may arise from the project action. The system should recover but it is unlikely that it will return to its natural state. Recovery would only take place in the medium term (5-15 years). Impacts on the human population will be felt after the project action is completed but are not severe and/or disruptive to their quality of life or economic well-being. **Impacts of High to Very High Significance:** Where the project actions will result in major long-term changes to the biophysical and/or socio-economic environment. The effects of the impact will be experienced outside of the project action area and may be evident at a regional, national and even at the international level. Secondary or indirect impacts may arise from the project action. The system may recover over the long-term (>15 years) but will not revert to its natural state. Impacts on human populations will be felt after the project action is completed. The impacts are of a long-term nature and are disruptive to the previous life style of the affected population. Determination of significance will be made on the assumption that any mitigation and/or management measure, which is recommended, will be implemented by the developer. The level of significance is expressed as the sum of the area exposed to the risk (extent), the length of time that exposure may occur over in total (duration), the severity of the exposure (intensity/magnitude), reversibility, and the likelihood of the event occurring (probability). **Significance Value = (Extent + Duration + Intensity + Reversibility) X Probability** A distinction is made for the significance rating without the implementation of mitigation measures and with the implementation of mitigation measures. The purpose of mitigation measures is to reduce the significance level of the anticipated impact. Therefore, the reduction in the significance level after mitigation is directly related to the scores used in the impact assessment criteria. The effect of potential mitigation measures to reduce the overall significance level is also to be considered in each issues table.	
No / Very Low Impact	There is no impact or a very low impact	**6 – 16**
Low	The impacts are less important, but some mitigation is required to reduce the negative impacts	**17 – 43**
Medium	The impacts are important and require attentions; mitigation is required to reduce the negative impacts.	**44 – 70**
High	The impacts are of high importance and mitigation is essential to reduce negative impacts	**71 - 96**

Degree of Confidence

The degree of confidence in the predictions, based on the availability of information and/or specialist knowledge.

Mitigation Measures

Mitigation is used to address all adverse environmental effects, whether or not subsequent analysis determines that the effects are significant. Relevant mitigation measures should form part of all phases for the project. The mitigation ratings are described qualitatively according to the success and feasibility of the mitigation option in question. An overall significance rating is assigned to the impact in question without mitigation measures in place and with mitigation measures in place, where applicable.

7.3.3 Mitigation Hierarchy

Best-practice dictates that offset investigations include a 'Mitigation Hierarchy Assessment' to determine what additional steps can be put in place before resorting to biodiversity offsets. An overview of the mitigation hierarchy is outlined here, followed by recommendations to strengthen existing mitigation measures to reduce negative impacts on biodiversity.

The protection of ecosystems and biodiversity generally begins with avoiding adverse impacts and, where such avoidance is not feasible, applying appropriate mitigation in the form of reactive practical actions that minimises or reduces impacts. Mitigation requires proactive planning that follows the mitigation hierarchy. The mitigation hierarchy's application is intended to avoid disturbance and/or loss of ecosystems, and where this cannot be avoided, to minimise, rehabilitate, and then finally offset any remaining significant residual impacts. The mitigation hierarchy is inherently proactive, requiring the ongoing and iterative consideration of alternatives in terms of project location, siting, scale, layout, technology, and phasing until the proposed development can best be accommodated without significant negative impacts on the receiving environment. In the case of sensitive ecosystems, where ecological impacts can be severe, the guiding principle should generally be "anticipate and prevent" rather than "assess and repair".

The ideal is that when project impacts are considered, the first option should be to avoid or prevent the impacts from occurring in the first place, however this is not always feasible. If this is not attainable, the impacts can be allowed, however they must be minimized as far as possible by considering reducing the footprint of the development for example so that little damage is encountered. If impacts are unavoidable, the next goal is to rehabilitate or restore the areas impacted back to their original form after project completion. Offsets are then considered if all the other measures described fail to remedy high-significant residual negative impacts. If no offsets can be achieved on a potential impact, which results in full destruction of any ecosystem for example, the no-go option is considered so that another activity or location is considered in place of the original plan.

The preferred layout does not impact the 'core corridor' in terms of the Saldanha Strategic Offset Strategy (SSOS, 2020), however it does impact a portion that requires biodiversity offset according to the SSOS and will be assessed in the EIR.

The offset requirements as set out in the SSOS and biodiversity guidelines will be determined and assessed in the EIR by the appointed specialist.

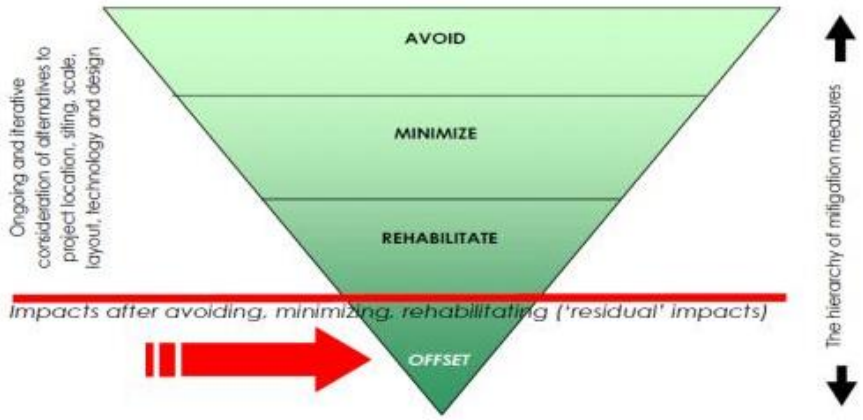

Figure 7-1: The Mitigation Hierarchy, Biodiversity Offset Guideline, 2023

7.3.4 Environmental Impact Assessment Report

The EIA Report will be prepared according to Appendix 3 of the EIA Regulations 2014 as amended, and will include the following:

a) "details and expertise of the EAP who prepared the report;
b) The location of the development footprint of the activity on the approved site as contemplated in the accepted scoping report;
c) A site plan which locates the proposed activity or activities applied for as well as the associated structures and infrastructure at an appropriate scale, or, if it is- (i) a linear activity, a description and coordinates of the corridor in which the proposed activity or activities is to be undertaken; (ii) on land where the property has not been defined, the coordinates within which the activity is to be undertaken:
d) A description of the scope of the proposed activity, including – (i) all listed and specified activities triggered an being applied for, and (iii) a description of the associated structures and infrastructure related to the development;

e) A description of the policy and legislative context within which the development is located and an explanation of how the proposed development complies with and responds to the legislation and policy context;
f) A motivation for the need and desirability for the proposed development, including the need and desirability of the activity in the context of the preferred development footprint within the approved site as contemplated in the accepted scoping report.
g) A motivation for the preferred development footprint within the approved site as contemplated in the accepted scooping report.
h) A full description of the process followed to reach the proposed development footprint within the approved site as contemplated in the accepted scoping report, including:
    i) Details of the development footprint alternatives considered;
    ii) Details of the public participation process undertaken in terms of regulation 41 of the Regulations, including copies of the supporting documents and inputs;
    iii) A summary of the issues raised by interested and affected parties, and an indication of the manner in which the issues were incorporated, of the reasons for not including them;
    iv) The environmental attributes associated with the development footprint alternatives focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
    v) The impacts and risks identified including the nature, significance, consequence, extent, duration and probability of the impacts, including the degree to which these impacts – (aa) can be reversed; (bb) may cause irreplaceable loss of resources, and (cc) can be avoided, managed or mitigated;
    vi) The methodology used in determining and ranking the nature, significance, consequences, extent, duration and probability of potential environmental impacts and risks;
    vii) Positive and negative impacts that the proposed activity and alternatives will have on the environmental and on the community that may be affected focusing on the geographical, physical, biological, social, economic, heritage and cultural aspects;
    viii) The possible mitigation measures that could be applied and level of residual risk
    ix) If no alternative development footprints for the activity were investigated, the motivation for not considering such; and
    x) A concluding statement indicating the location of the preferred alternative development footprint within the approved site as contemplated in the accepted scooping report;
i) A full description of the process undertaken to identify, assess and rank the impacts the activity and associated structures and infrastructure will impose on the preferred development footprint on the approved site as contemplated in the accepted scoping report through the life of the activity, including – (i) a description of all environmental issues and risks that were identified during the environmental impact assessment process and (ii) an assessment of the significance of each issue and risk and an indication of the extent to which the issue and risk could be avoided or addressed by the adoption of mitigation measures.
j) An assessment of each identified potentially significant impact and risk including-
    i) Cumulative impacts
    ii) The nature, significance and consequences of the impact and risk
    iii) The extent and duration of the impact and risk
    iv) The probability of the impact and risk occurring
    v) The degree to which the impact and risk can be reversed;
    vi) The degree to which the impact and risk may cause irreplaceable loss of resources; and
    vii) The degree to which the impact and risk can be mitigated.
k) Where applicable, a summary of the findings and recommendations of any specialist report complying with Appendix 6 to these Regulations or the related Protocols and an indication as to how these findings and recommendations have been included in the final assessment report;
l) An environmental impact statement which contains –
    i) A summary of the key findings of the environmental impact assessment
    ii) A map at an appropriate scale which superimposes the proposed activity and its associated structures and infrastructure on the environmental sensitivities of the preferred development footprint on the

approved site as contemplated in the accepted scoping report indicating any areas that should be avoided including buffers; and

iii) A summary of the positive and negative impacts and risks of the proposed activity and identified alternatives;

m) Based on the assessment, and where applicable, recommendations from specialist reports, the recording of proposed impact management outcomes for the development for inclusion in the EMPr as well as for inclusion as conditions of authorisation;

n) The final proposed alternatives which respond to the impact management measures, avoidance, and mitigation measures identified through the assessment;

o) any aspects which were conditional to the findings of the assessment either by the EAP or specialist which are to be included as conditions of authorisation;

p) a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed;

q) a reasoned opinion as to whether the proposed activity should or should not be authorised, and if the opinion is that it should be authorised, any conditions that should be made in respect of that authorisation;

r) where the proposed activity does not include operational aspects, the period for which the environmental authorisation is required and the date on which the activity will be concluded and the post construction monitoring requirements finalized;

s) an undertaking under oath or affirmation by the EAP in relation to—

i) the correctness of the information provided in the reports

ii) the inclusion of comments and inputs from stakeholders and I&Aps

iii) the inclusion of inputs and recommendations from the specialist reports where relevant; and

iv) any information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested or affected parties;

t) where applicable, details of any financial provision for the rehabilitation, closure, and ongoing post decommissioning management of negative environmental impacts;

u) an indication of any deviation from the approved scoping report, including the plan of study, including–

i) any deviation from the methodology used in determining the significance of potential environmental impacts and risks; and

ii) a motivation for the deviation

v) any specific information that may be required by the competent authority;

w) and any other matters required in terms of section 24(4)(a) and (b) of the Act"

7.3.5 Environmental Management Programme (EMPr)

A site-specific Environmental Management Programme (EMPr) will be included as part of the EIA Report. The EMPr will be prepared according to Appendix 4 of the EIA Regulations, 2014 as amended, and will include the following:

a) "details of– (i) the EAP who prepared the EMPr; and (ii) the expertise of that EAP to prepare an EMPr, including a curriculum vitae;.

b) detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description.

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

d) a description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including–

i) planning and design;

ii) pre-construction activities;

iii) construction activities;

iv) rehabilitation of the environment after construction and where applicable

v) post closure; and
vi) where relevant, operation activities;

e) a description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraph (d) will be achieved, and must, where applicable, include actions to —
   i) avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation;
   ii) comply with any prescribed environmental management standards or practices;
   iii) comply with any applicable provisions of the Act regarding closure, where applicable; and
   iv) comply with any provisions of the Act regarding financial provision for rehabilitation, where applicable
f) the method of monitoring the implementation of the impact management actions contemplated in paragraph (f);
g) the frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f);
h) an indication of the persons who will be responsible for the implementation of the impact management actions;
i) the time periods within which the impact management actions contemplated in paragraph (f) must be implemented;
j) the mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f);
k) a program for reporting on compliance, taking into account the requirements as prescribed by the Regulations;
l) an environmental awareness plan describing the manner in which—
   i) the applicant intends to inform his or her employees of any environmental risk which may result from their work; and
   ii) risks must be dealt with in order to avoid pollution or the degradation of the environment; and
m) any specific information that may be required by the competent authority."

7.3.6 Public Participation in the EIA Phase

The objective of the Public Participation Process (PPP) in the EIA phase of the project is to present the findings of the investigations to the stakeholders and to provide them with an opportunity to comment on these.

In order to achieve this, the Draft EIA Report will be available for review by registered I&APs and Organs of State / State Departments for a period of 30 days.

The availability of the EIA Report and meetings with I&APs (if required) will be conducted as in the scoping phase of the EIA process. All registered stakeholders on the stakeholder database will be notified in writing (i.e. e-mail or fax).

Comments and issues raised will be noted in an updated version of the Issues and Responses Report. These comments will then be considered and incorporated into the Final EIA Report for submission to the DEADP.

7.3.7 EIA Phase Programme

The key dates for the EIA process are listed in the table below. These timeframes are preliminary and may change as the EIA progresses.

Table 7-2: Key Dates in the EIA Process

Date	Activity
31 October 2025 – 1 December 2025	Pre-application Public Participation
February 2026	Submission of Application Form and Draft Scoping Report to DEADP
February 2026	Acknowledgement of Receipt of EIA Application and Draft Scoping Report by DEADP
March - April 2026	Public Participation – Review and Comment Period of Draft Scoping Report

Date	Activity
	Submission of Final Scoping Report to DEADP
April -May 2026	DEADP Review of Final Scoping Report
May – June 2026	Public Participation - Review and Comment Period of Draft EIA Report
July 2026	Submission of Final EIA Report to DEADP
July - November 2026	DEADP Review of EIA Report
November 2026	Decision (Environmental Authorisation / Refusal) Issued
November - December 2026	Notification of Decision to I&APs and Appeal Notification Period

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8 CHAPTER 8: PUBLIC PARTICIPATION

8.1 NOTIFICATIONS

Notifications announcing the intent to apply for an Environmental Authorisation (EA) and an Atmospheric Emissions License (AEL) was distributed on 31 October 2025. The notification included a Public Participation Notice and the Executive Summary of the Pre-application Draft Scoping Report.

Notification of the EIA application were distributed to the following electronically:

- Landowners and surrounding landowners / land users
- Ward councilors of ward 5 and 14
- State Departments at national, provincial and local municipality level.
- Other organisations: Saldanha Bay Water Quality Forum Trust, Aikonese Cochoqua Khoi Tribal Council; Cape West Coast Biosphere Reserve.

Notification will be placed in the following areas:

- Newspaper advertisements in the in Die Burger and Weslander on 31 October 2025 and 7 November 2025, respectively.
- Site Notices at the Eastern boundary of the site on Freeport Access Road opposite the tipplers, as well as across from where the silos would be located, on Freeport Access Road on 15 October 2025

Figure 8-1: Site Notices next to Freeport Access Road on the boundary of the proposed site

8.2 INTERESTED AND AFFECTED PARTIES

A database of I&APs has been compiled, including Organs of State and/or State Departments, and will be updated throughout the EIA process should additional stakeholders or I&APs be identified or request registration.

All identified landowners, surrounding landowners, representatives of organs of state (National, provincial, SBMA, WCDM) will be automatically registered for the process.

An indication of registration received is provided in the register (Table 8-1). Comments and responses are included in the Comments and Response Report (Appendix D)

The public are invited to register as Interested and Affected Parties (I&APs) so that they can comment or raise issues on the proposed project.

Table 8-1: Register of Interested and Affected Parties (also included in Appendix D)

Organisation / Name	Role	City / Town	Registration date / Date comment received	Contact Details	Email
Project Applicant					
Newfields Investments Shaun Ramdhari **Kirusha Govender**	Project manager / Environmental Officer	KZN	Automatically registered	[redacted]	[redacted]
Landowners					
AfriSam / Hardie De Beer		WC	Automatically registered	Phone: +27 11 670 5500 Mobile: +27 83 679 0163	hardie.debeer@za.afrisam.com
Adjacent landowners					
Name: YZERVARKENSRUG Farm Nr:69/127	Avedia Energy (develop LPG with Transnet)		Automatically registered	[redacted]	[redacted]
Name: YZERVARKENSRUG Farm Nr:127					
Name: PIENAARS POORT					

Organisation / Name	Role	City / Town	Registration date / Date comment received	Contact Details	Email
Farm Nr:7/197					
Name: PIENAARS POORT Farm Nr:8/197	Transnet Port terminal tipplers				[redacted] [redacted] [redacted]
Farm Nr:1185	TPT CCR Shipwright Service Transnet Port Terminal				[redacted]
14722	Pindulo VDM				[redacted] [redacted]
11677	Antcor Pty Ltd				[redacted] [redacted]
11683	West Arcor				[redacted]
11688	Duferco				[redacted]
Name: YZERVARKENSRUG Farm Nr:49/127	Vaalmac Saldanha Pty Ltd Saldanha Industrial Dev. Zone			[redacted] [redacted]	[redacted] [redacted] [redacted] [redacted]
Name: YZERVARKENSRUG Farm Nr:53/127	SPH Kundalila			[redacted] [redacted]	[redacted]

Organisation / Name	Role	City / Town	Registration date / Date comment received	Contact Details	Email
NGOs					
The Saldanha Bay Water Quality Forum Trust (SBWQFT)	Phone: 022 714-3367 Cell: 082 376-8529		Automatically registered		[redacted]
ORGANS OF STATE					
DEADP	Zaahir Toefy				[redacted]
DEADP	Taryn Dreyer		Automatically registered		[redacted]
DEADP	Themba Silinda – Environmental Officer		Automatically registered	[redacted]	[redacted]
DEADP	Herman Jonker				[redacted]
DEADP	Chrizelle Kriel – Saldanha strategic offset policy			[redacted]	[redacted]
DEADP: Pollution & Chemicals Management	Ms. Arabel McClelland				Arabel.McClelland@westerncape.gov.za Wilna.kloppers@westerncape.gov.za
DEADP: Waste Management	Mr. Saliem Haider Mr. Lance McBain-Charles				Saliem.Haider@westerncape.gov.za Lance.McBain-Charles@westerncape.gov.za etienne.roux@westerncape.gov.za shanekom@westerncape.gov.za
Department of Agriculture, Western Cape	Cor van der Walt				corvdw@elsenburg.co.za landuse.elsenburg@elsenburg.com brandonl@elsenburg.co.za

Organisation / Name	Role	City / Town	Registration date / Date comment received	Contact Details	Email
Heritage Western Cape	CEO Heritage Western Cape				[redacted]
Emily Vowles, HWC	HWC				[redacted]
Department of Water and Sanitation	Mr. Warren Dreyer				[redacted]
DWS: Berg-Olifants WMA	Ziyanda Magodla				[redacted]
Department of Health	Mr Stanley Nomdo				[redacted]
DEA&DP Air Quality Management	Dr Joy Leaner				[redacted]
DEA&DP Air Quality Authorisations	Edward Mahosi				[redacted]
Department: Transport and Head public works					[redacted]
CapeNature	Mr. Marius Wheeler Ismat Adams				[redacted]
CapeNature	Marius Wheeler				[redacted]
Transnet	Raymond Van Rooyen				[redacted]
Transnet	Nicole Abrahams				[redacted]
Transnet	Marlon Saayman				[redacted]

Organisation / Name	Role	City / Town	Registration date / Date comment received	Contact Details	Email
Transnet	Adele Groenewald				[redacted]
Eskom					[redacted]
Department of Trade and industry (DTI)					[redacted]
Saldanha Bay IDZ				[redacted]	[redacted]
West Coast DM & Saldanha Bay LM					
West Coast District Municipality	Municipal Manager, Mayor				[redacted]
West Coast District Municipality: Air Quality	Cindy Ganten-Bein				[redacted]
West Coast District Municipality: Air Quality	Celeste Minnaar				[redacted]
West Coast District Municipality: Environmental Officer	Charles Malherbe				[redacted]
Saldanha Bay Municipality	General				[redacted]

Organisation / Name	Role	City / Town	Registration date / Date comment received	Contact Details	Email
Saldanha Bay Municipality	Municipal manager				[redacted]
Ward 5	Cllr Charmaine Laubscher				[redacted]
Saldanha Bay Municipality	André Lewaks			[redacted]	[redacted]
Roads and Transport					
Chumisa Njingana / Nanna Gouws SOUTH AFRICAN NATIONAL ROADS AGENCY S O C LTD (SANRAL)	SANRAL Statutory Control Administrator	PE			[redacted]
National Department of Transport & Public Works – Brian Stander	National Department of Transport & Public Works – Brian Stander	Automatically registered			[redacted]

8.3 DRAFT SCOPING REPORT REVIEW PERIOD

The objective of the public comment period is for I&APs to raise issues about the information presented in the report and for them to raise any other issues related to the proposed project. Should I&APs wish to register during this period, they would be allowed to.

Pre-application Public participation announced the availability of the Pre-Application Scoping Report for public comment and review for a 30 day period (31 October 2025 until 8 December 2025).

- Newspaper advertisements were placed in Die Burger and Weslander on 31 October 2025 and 7 November 2025, respectively.
- Site notices were placed at the Eastern boundary of the site on Freeport Access Road opposite the tipplers, as well as across from where the silos would be located, on Freeport Access Road on 15 October 2025.
- 30-day registration of Interested and affected parties (I&APs) and review and comment period on the pre-application scoping report provided from 31 October 2025 until 8 December 2025.

Post application public participation will include the following (i.e. after the application for Environmental Authorisation has been submitted to the DEADP):

- The Draft Scoping Report will be made available to I&APS and stakeholders for a 30-day review and comment period (Currently in progress 9 March 2026 until 11 April 2026)
- The Final Scoping Report is updated with comments received from I&APs, submitted to the DEADP for approval. The Final Scoping Report will be made available to I&APs for information purposes only.
- After acceptance of the Scoping Report by the DEADP, the Draft Environmental Impact Report (EIR) will be made available for a 30-day review and comment period to registered I&APs and stakeholders.
- The Draft EIR will be updated with comments received, and the Final EIR will be submitted to the DEADP for authority review and decision making. The Final EIR will be made available to I&APs for information purposes only.

Comments and issues raised during the public review period of the Pre-Application Scoping Report will be addressed and incorporated in the Draft Scoping Report.

The Final Scoping Report will be made available to I&APs and Organs of State / State Departments for information purposes only.

8.4 COMMENTS AND RESPONSE REGISTER

The following table (Table 8-2) presents comments received, by whom, method of communication and response. All comments and responses received to date is included in the Comments and Response Report (Appendix D).

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Table 8-2: Comments / Issues and Response

Name	Organisation / Role	City / Town / District	Comment Received	Response
Emily Vowles	HWC			
Jerome Vraagom	V and Sons Pty Ltd			
Magnus van Rooyen	Ecolink		**Email 1:** Request to be registered as an IAP and requested that all information generated during the process be provided. **Email 2**: Who is the Pre-application Scoping Report being circulated to? **Email 3**: the advert makes provision for the availability of the pre-application environmental report from 31 October 2025 to 30 November 2025. I note the report was not made available to me during my registration as an I&AP, but was informed that this document was only made available to the following entities: Neighbours, organs of state, local and district municipalities, and identified potential I&APs. This being the case, why did the advert make reference of the comments period on the document if it was not available to the general public. As such, can a copy of the report please be provided to me and I am allowed to provide comment on the contents thereof? As I was informed via email that the report will only be provided to a selected group, can I also please request a 14-day extension period to make comment on the report. Can I please be provided with a layout plan for the facility as well as the transport routes as quoted in the newspaper advert? Can clarity please be provided as to what mineral will be	**Email 1**: Registered as an IAP. Pre-application Draft Please submits written comments and concerns. All IAPs will be notified c once the post-application Draft Scoping Report will be available for public participation. **Email 2**: Neighbours, organs of state, local and district municipal officials, competent authority and identified IAPs were notified. Newspaper adverts and site notices were used as well. **Email 3**: The Pre-application Draft Scoping Report is readily available on our website: https://environmentcen.co.za/project-items/bulk-mineral-ore-storage-terminal-saldanha/. I also attached the report as requested. I would like to clarify that email notifications with the executive summary attached were sent to the entities listed in your email (i.e. neighbours, organs of state, authorities, etc.). However, this does not imply that the Pre-application Draft Scoping Report was not accessible to any other I&AP. Please note that the 30 day public participation process has been extended until 8 December 2025.

Name	Organisation / Role	City / Town / District	Comment Received	Response
			handled by the facility? Can copies of the Application for Environmental Authorisation as well as the Air Emissions Licence Application Form be provided to me?	I trust you will find this in order. The EIA Application has not been submitted yet, and is currently being drafted. As such it is not ready to be circulated. The AEL Application is also not ready for submission as it requires the Public Participation Process Report, which is not finalised yet as PPP has been extended until 8 December 2025. The mineral ore planned for storage and handling is manganese. Please do not hesitate to contact me if you have any other queries or comments.
ELMIEN DE BRUYN	Duferco Steel Processing	Saldanha Bay	Requested to be registered as an IAP.	Registered as an IAP.
Christo Van Wyk	The Saldanha Bay Water Quality Forum Trust	Saldanha Bay	Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay The SWQT (Saldanha Water Quality Trust) would like to be included in the EIA process and comment on the current documentation available. Our 2025 State of the Bay Report indicate an increase in the manganese footprint in the bay as per the sediment monitoring surveys. An increase in manganese dust footprint in the bay could cause a negative impact on the aquaculture industry and filter feeder (mussel) harvesting around the bay. Also black discolouration of domestic and industrial infrastructure could have a negative impact on	Your comment and request to be registered as an Interested and Affected Party (IAP) is noted. Would you like me to add the email addresses copied in this email to the registered IAP database as well? The impacts associated with the proposed development will be assessed in the Environmental Impact Assessment Report which will also be circulated for review and comment. An Air Quality Specialist has been appointed to conduct an assessment. The pre-application Draft Scoping Report is available for public review and comment on CEN

Name	Organisation / Role	City / Town / District	Comment Received	Response
			tourism around the bay. The increase in dust footprint due to these planned activities needs to be investigated (specialist report), especially as the current conveyor system in the harbour is ineffective, the dust footprint in the port and back of port area is very significant and visible and should be reduced.	IEM Unit's website: https://environmentcen.co.za/project-items/bulk-mineral-ore-storage-terminal-saldanha/ If you have difficulty accessing the documents, please let me know.
Kyle Dods	Red Dust Action Group	Saldanha	As CEO of our organisation, and as a regional stakeholder in matters relating to dust, emissions, and general atmospheric impact in Saldanha, I hereby request that my full team be formally added to the Interested and Affected Parties (I&AP) register for the Newfields Bulk Mineral Ore Storage Terminal application. It is therefore a concern that the RDAG was not invited to register, despite our extensive involvement in environmental compliance, dust mitigation, and community protection within the affected area. We kindly request clarification on the basis upon which key stakeholders were identified? you please register the following individuals of our organisation with effect: Mark West; Hein Witte; Adam Scholtz; Brian Blackbeard; Kyle Dods. Our RDAG Advisory Committee has also been copied into this correspondence and may request individual registration. Further to this, we openly criticise the timing of the release of the Scoping Report and the associated 30-day comment period as being highly inappropriate. The window falls squarely within a period of substantial year-end operational pressure, public holidays, and known stakeholder unavailability. This raises justified concerns	Good Afternoon Mr Dods Yourself, and your full team, as listed in your email and copied into the thread, has been registered as I&APs for the Newfields Bulk Mineral Ore Storage Terminal application. All registered I&APs will be notified during the public participation process regarding the availability of reports for comment and review. The intention of the pre-application public participation process is to ensure that all stakeholders and potential I&APs are notified and that adequate measures were taken to notify the public of the proposed development prior to the submission of an Environmental Authorisation Application. There will be another round of public participation for the Post-Application Draft Scoping Report whereby members of the public and I&APs can review and comment on the report, and still register as I&APs. The key stakeholders identified as part of this public participation process were the competent

Name	Organisation / Role	City / Town / District	Comment Received	Response
			regarding transparency, accessibility, and whether the process has been structured in a manner that limits meaningful public participation. We have copied the West Coast District Municipality, under whose jurisdiction this licensing process will most likely fall, and hereby formally request an extension of the public comment period within a meaningful and acceptable period in the new year, to ensure reasonable and substantive engagement. The Saldanha Bay Municipality's atmospheric dome is already under significant strain and the community at large is severely affected in ways your operation would not be able to value. An additional project of this nature requires thorough scrutiny and adequate time for community review and engagement at large. We look forward to your confirmation of our inclusion as I&APs and your response regarding the extension request. RDAG is committed to constructive engagement. And working alongside operators to unlock and unleash the potential within the area and we trust that our concerns will be treated with the appropriate level of seriousness and incorporated meaningfully into the development of your project. We choose to be seen as an organisation that works alongside development to navigate a sustainable, ethical and considered approach to achieving the desired outcome.	authorities (for both the EA Application and the AEL Application); organs of state; District and Local Municipal Officials; Ward Councillors; neighbouring land owners and users; land owners and users of the proposed site; business forums; community forums; SANPARKS; Cape Nature. The particulars and comments received during the public participation process will be captured in a Public Participation Report that will accompany the Post-Application Draft Scoping report. Apart from email notifications being circulated to potential identified I&APs, two newspaper adverts were published and two site notices placed at the site of the proposed development. We have received several registration requests from members of the public, most of which were not sent an email notification. This indicates that the newspaper adverts as well as the site notices were adequate in notifying the public. Not receiving an email notification does not equate to being excluded. The request to be registered as an I&AP is noted and fulfilled. Your concern with the lack of email notification is also noted. Your concern regarding the 30 day public participation process is noted. Please note that there are no South African Public Holidays within

Name	Organisation / Role	City / Town / District	Comment Received	Response
				this public participation period. We note your request for an extension of the public comment period. Although we understand the need, the DEA&DP circulated a memo requesting applicants and EAPs not to conduct public participation processes over the festive period (i.e. 15 December 2025 to 05 January 2026). Thank you for your participation in the process. We look forward to your continued participation.
C Benton	West Coast District Municiaplity -	WCDM	Thank you for including this office, who is also the licencing authority in terms of the atmospheric emission licence, as an I&AP. With reference to the pre-application scoping report, please find attached comments from this office. 1. it is noted that the proposed activity triggers subcategory 5.1: Storage and Handling of Ore and Coal as listed in the National Environmental Management: Air Quality Act (NEM:AQA). The applicant must therefore obtain an atmospheric emission licence prior to the commencement of the above-mentioned listed activity. The competent authority to issue the atmospheric emission licence is the West Coast District Municipality. The application may be emailed to the Air Quality Officers via the following email addresses: dgbein@wcdm.co.za and Cjminnar@wcdm.co.za. As per section 22 of the NEM:AQA, no person may conduct a listed activity without and atmospheric emission licence.	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			Consequences as per Section 22A of the NEM:AQA will be applied if such unlawful activity takes place. The applicant must submit to this office the granted environmental authorisation. The applicant must submit to this office the following studies in order for this office to make informed decisions: • Air quality assessment – this report must contain dispersion modelling of the proposed activity • Health impact assessment • Socio-economic Impact assessment • Traffic Impact Assessment • Noise Impact assessment • Visual Impact Assessment It is required of the applicant to apply the National dust control regulations during the construction and operational phases. The applicant will be required to establish a dust fallout monitoring network as per the National Dust Control Regulations and as amended, prior to the commencement of the listed activity.	
Ismat Adams	Cape Nature		1. It is noted that the proposed development is within the offset-required area as per the SSOS. The plan of study including fauna and avifauna, aquatic biodiversity, terrestrial biodiversity and botanical assessments are supported. 2. Note that should the residual biodiversity impacts meet biodiversity offset thresholds then an offset should be proposed aligned to the requirements	Thank you for your comment. Please note that public participation has been extended until 8 December 2025. We look forward to your continued participation in the process.

Name	Organisation / Role	City / Town / District	Comment Received	Response
			of the National Biodiversity Offset Guidelines.	
Hugo Tallie			I refer to the Pre-Application Scoping Report issued for public participation and the 30-day registration, review, and comment process for Interested and Affected Parties (I&APs). I hereby request to be registered as an I&AP in order to review the application, and kindly request clarity on the following points: • The current zoning of Portion RE 1139 belonging to Afrisam; • Whether a Consent Use for restricted industry has been granted by Saldanha Municipality to store and handle manganese or other ore; • Whether approval has been granted by the relevant road network authority to cross the public road for the above-ground transportation of manganese to their facility via conveyor belts • Whether approval has been granted by Transnet to offload trains using the Transnet Tippler 3; • Whether approval has been granted by TNPA to construct a conveyor belt on their property for transporting manganese to the Multi-Purpose Terminal (MPT); • Whether servitudes have been registered to allow crossing of private and public property for the proposed conveyor belts required to transfer the manganese; • Whether alternative land has been identified to offset the proposed footprint (10 ha for every 1 ha developed), in accordance with the Regional Spatial	**Email 1:** Your request to be registered as an I&AP is noted and this serves as confirmation that you have been added to the I&AP register for the proposed development. The concerns and queries in your correspondence is noted. We will respond soonest with the information as requested. We look forward to your participation in the process. **Email 2:** The current zoning of the proposed site is Agricultural, and rezoning to Industrial is pending. The applicant is currently in the process of obtaining permissions from Transnet for the use of the tippler and existing conveyor belt that runs to the MPT. The applicant is no longer intending to apply for the development of a conveyor belt to the MPT. These changes will be reflected in the EA Application as well as the Post-application Scoping Report. The applicant is in the process of applying for consent from the Saldanha Bay Municipality. A specialist will be appointed to conduct a biodiversity offset study and to identify appropriate

Name	Organisation / Role	City / Town / District	Comment Received	Response
			Implementation Framework (RSIF) for the Greater Saldanha Region. Kind regards **Email 2:** Thanks for the info, please also confirm if Transnet has approved this site as an extra Back of Port facility.	land should a biodiversity offset be required **Email 3:** Thank you for your patience while waiting for my response. The applicant does not require permission from Transnet to build the facility – however the applicant will need Transnet's consent for an offtake for the ore as well as permissions to tie in to the current tipper and conveyor infrastructure. These permissions have not yet been finalised at this stage. If you have any other questions or concerns, please let me know.
Ore export corridor Users Forum (Pty) Ltd	Henk Bester		Please find attached the OUF's formal submission on the Pre-Application Draft Scoping Report for the proposed manganese storage and handling facility in Saldanha Bay. Please let us know should you require any further clarification or engagement on the matters raised. Letter: We address this letter to CEN Integrated Environmental Management Unit as the Environment Assessment Practitioner (EAP) responsible for compiling the pre-application draft scoping report for the proposed manganese storage and handling facility at Saldanha ("Scoping Report"). For the reasons set out below the Ore export corridor	Please note that OUF and all copied in this email has been registered as Interested and Affected Parties (I&APs) for the proposed Newfields Manganese Storage and Handling Facility in Saldanha Bay. Your written comment on the pre-application Draft Scoping Report will be included and addressed in the post-application Draft Scoping Report. The proposed development and associated infrastructure will be described in greater detail in the Environmental Impact Assessment Report (EIR). The applicant is currently in the process of obtaining permissions from Transnet for the use of the tippler and existing conveyor belt that runs to the MPT. The applicant is no longer intending to

Name	Organisation / Role	City / Town / District	Comment Received	Response
			Users Forum (OUF) is an interested and affected party (I&AP) and therefore we request that the EAP register us as an I&AP for purposes of submitting our comments on the Scoping Report as well as all future notifications, notification of meetings, reports and decisions related to the proposed facility. The OUF is a consortium established by the four major iron ore producers and exporters in the Northern Cape: Afrimat Ltd, Assmang (Pty) Ltd, Sishen Iron Ore Company (Pty) Ltd, and Sedibeng Iron Ore (Pty) Ltd. Collectively, these parties are the primary users of the Ore Export Corridor (OEC) and export iron ore from the Northern Cape via Saldanha. The OUF members export ~50 million tons of iron ore annually and currently hold contracted iron ore export capacity of ~60 million tons per annum on the OEC. This allocation represents the entirety of iron ore exports and contracted export capacity within the corridor. As such, OUF members are responsible for the majority of bulk ore volumes transported along the Sishen to Saldanha ore line and exported through the Bulk Terminal Saldanha (BTS) and the Multi-Purpose Terminal (MPT). Given the OUF members' reliance on the OEC rail and port system for the export of iron ore, we hold a direct, material, and legitimate interest in developments that may affect: • Capacity, reliability, or safety of rail and port operations; • Allocation or reallocation of rail and port	apply for the development of a conveyor belt to the MPT, thereby reducing the environmental impact. These changes will be reflected in the EA Application as well as the Post-application Draft Scoping Report. The pre-application Draft Scoping Report does reference the affecting environment and includes potential identified impacts associated with the development, including impacts of a cumulative nature. Additionally, the report also includes all EIA Listed Activities that may be triggered by the proposed development. Notices regarding the availability of the pre-application Draft Scoping Report were circulated to key stakeholders and identified potential I&APs. Additionally, two site notices were placed at the proposed site, and two adverts appeared in local newspapers.

Name	Organisation / Role	City / Town / District	Comment Received	Response
			infrastructure; • Environmental conditions and compliance obligations in the Saldanha export precinct; • Future expansion potential of the iron ore and manganese export system; • Operational interfaces with Transnet Infrastructure Manager (TRIM), Transnet Freight Rail (TFR), Transnet Port Terminals (TPT), and Transnet National Ports Authority (TNPA). For these reasons, the OUF and its members are regarded as interested and affected parties (I&APs) in terms of the NEMA EIA Regulations. Any new infrastructure proposal within or adjacent to the OEC rail corridor, the Saldanha industrial zone, the BTS or MPT directly affects existing operations, future corridor planning and the commercial activities of OUF members. Our review of the document has identified several material inaccuracies, technical inconsistencies, and omissions. These issues collectively raise concerns about the feasibility, environmental impact analysis, and procedural validity of the proposed project as currently described. Below we summarise OUF's key comments aligned with four key themes: Fundamental operational assumptions used are incorrect The project description is based on assumptions that are factually inaccurate and inconsistent with current operations at Saldanha: • The document incorrectly states that manganese ore wagons carry 120 tons, whereas the current actual maximum payload is 67 tons (based on maximising type	

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			CR17 capacity). • Reference to a "Transnet rail siding" is vague and technically inaccurate. All existing TRIM operated yards at Saldanha are already fully utilised by iron ore and manganese trains, with no spare siding capacity for this proposed operation. • Statements regarding shiploaders operating at 5 000 tph each are unsubstantiated. No such shiploaders exist at MPT or any non-iron ore berth and understanding de-ballast rates for manganese ships will not make sense at all. • High-level references to supporting infrastructure (roads, utilities, workshops, stormwater, water, electricity) provide no meaningful technical detail, making it impossible to evaluate feasibility or environmental impacts. Collectively, these inaccuracies indicate a limited understanding of the operational realities, constraints and technical requirements of the existing heavy haul and port system Incorrect statements regarding the use of Tippler 3 The Scoping Report incorrectly assumes that the proposed project can utilise Tippler 3 for offloading manganese ore. In reality, Tipplers 1 and 2, as well as the under-construction Tippler 3, are all dedicated exclusively to iron ore operations at the BTS. The design of Tippler 3 and its associated infrastructure, including apron feeders, dust extraction systems, and downstream material handling equipment, has been engineered specifically for iron ore	

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			and does not incorporate any provision for handling manganese or other commodities. The proposed conveyor and port handling configuration is technically not feasible within the existing Saldanha export system. Tippler 3 and the broader Saldanha port terminal infrastructure have no interfaces, integration points or approved development pathways that would allow the diversion, conveyance or shiploading of manganese in the manner described in the Scoping Report. As a result, the Scoping Report's depiction of material flow and port integration does not align with the engineering design and operational realities of the Saldanha port terminal system. Taken together, the assumptions made in the Scoping Report contradict both the current operational configuration and the approved engineering design of the Saldanha port terminal system, rendering this aspect of the project description technically incorrect and operationally unfeasible. **Environmental sensitivities and inadequate assessment of NEMA-listed activities** The OUF wishes to emphasise that the Saldanha Port precinct and surrounding areas are among the most environmentally sensitive zones along the West Coast, comprising multiple Endangered and Critically Endangered vegetation types. Over several decades, all existing Saldanha port infrastructure has been carefully designed, engineered and environmentally managed to mitigate the ecological risks inherent to this landscape. In this context, plans to clear large areas for new silos,	

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			roads, conveyors, and support structures pose serious ecological threats. The proposed 5.1 km conveyor would cross several biodiversity areas, risking habitat fragmentation and undermining conservation efforts. The Scoping Report does not sufficiently account for these risks, nor does it address the cumulative environmental impact associated with additional large-scale industrial infrastructure in an already constrained ecological setting. Additionally, the Scoping Report's evaluation of NEMA-listed activities is incomplete and inaccurate, misapplying listed activities and overlooking cumulative effects from new and existing developments in Saldanha Bay. **Lack of consultation with key stakeholders** A further concern is the apparent absence of meaningful consultation with the key stakeholders. There is no indication in the Scoping Report that the applicant engaged with TRIM, TPT, or the TNPA even at concept level prior to initiating this environmental process. The lack of early engagement has resulted in several incorrect assumptions about how the Saldanha rail and port precinct operates, which in turn has created unnecessary concern within an already environmentally and operationally sensitive area. Without alignment with key stakeholders, the proposed solution does not demonstrate the required technical viability, industry support, or alignment with established rail-port system optimisation efforts. The OUF is concerned that proceeding on the basis of these inaccuracies may undermine stakeholder trust and compromise the integrity	

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			of the broader environmental assessment process. Based on the issues highlighted above, the OUF is of the view that the Pre-Application Draft Scoping Report contains material factual inaccuracies, lacks technical grounding, and omits critical stakeholder engagement. The OUF therefore opposes the proposed development and recommends that the environmental approval not be granted.	
Manganese Producers Consortium	Henk Bester		We address this letter to CEN Integrated Environmental Management Unit as the Environment Assessment Practitioner (EAP) responsible for compiling the pre-application draft scoping report for the proposed development and operation of a bulk mineral ore storage terminal and conveyors at Saldanha ("Scoping Report"). For the reasons as set out below, the Manganese Producers Consortium (Pty) Ltd (MPC), is an interested and affected party (I&AP) and therefore we request that the EAP register us as an I&AP for purposes of submitting our comments on the Scoping Report as well as all future notifications, notification of meetings, reports and decisions related to the proposed facility. Set out below are our contract details for purposes of registering the MPC as an I&AP: • Representative of Manganese Producers Consortium (Pty) Ltd: Mr Henk Bester. • Email address: board@mpc-ltd.co.za. • Postal address: 1 st Floor, Katherine &West Building, 114 West Street, Sandown, Sandton 2191.	Please note that MPC has been registered as Interested and Affected Parties (I&APs) for the proposed Newfields Manganese Storage and Handling Facility in Saldanha Bay. Your written comment on the pre-application Draft Scoping Report will be included and addressed in the post-application Draft Scoping Report. The proposed development and associated infrastructure will be described in greater detail in the Environmental Impact Assessment Report (EIR). The inaccuracies regarding cargo capacities and shiploading assumptions will be addressed and corrected in the post-application Draft Scoping Report. The applicant is currently in the process of obtaining permissions from Transnet for the use of the tippler and existing conveyor belt that runs to

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			• Project Reference: Pre-application draft Scoping Report – proposed development and operation of a bulk mineral ore storage terminal and conveyors, Saldanha. MPC is a consortium of Manganese Ore producers. This consortium has come together with purpose of co-creating holistic solutions to the logistics challenges faced by South Africa Manganese Ore producers and, in so doing, deriving a competitive advantage for the country's producers. The Chairperson of MPC's board of directors is Mcebisi Jonas and the shareholders of MPC, both current and in process, are: • Assmang Proprietary Limited. • Kudumane Manganese Resources Proprietary Limited (KMR). • Hotazel Manganese Mines Proprietary Limited (Part of South32). • Tshipi éNtle Manganese Mining Proprietary Limited. The shareholders of MPC contribute ±60% of long term sustainable Manganese Ore exports from South Africa, making MPC's role critical in ensuring that infrastructure developments are operationally and commercially feasible and sustainable, environmentally sustainable and compliant from a regulatory perspective. The Saldanha region is an ecologically sensitive area, with ecosystems that are highly vulnerable to industrial disturbance, and bulk material handling of Manganese Ore needs to be carefully considered to mitigate the risks of dust emissions and potential contamination of surrounding habitats. MPC has significant reservations regarding the environmental impact and technical	the MPT. The applicant is no longer intending to apply for the development of a conveyor belt to the MPT, thereby reducing the associated environmental impact. These changes will be reflected in the EA Application as well as the Post-application Draft Scoping Report. The manganese ore will be dropped from the enclosed conveyor, into a chute at the top of the silo. The entire system will be enclosed, reducing the risk of dust emission and air pollution. The pre-application Draft Scoping Report does reference the affected environment and includes potential identified impacts associated with the development, including impacts of a cumulative nature. Additionally, the report also includes all EIA Listed Activities that may be triggered by the proposed development.

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			feasibility of the proposed facility. Furthermore, the approach, which is neither substantiated by facts nor supported by in-principle agreements, creates more problems and unnecessary panic in the West Coast Community **Environmentally sensitive site and Regulatory Issues** The proposed site includes critically endangered vegetation types, and clearing approximately 33 hectares poses severe ecological risks. MPC notes that the assessment of NEMA-listed activities is incomplete and fails to account for cumulative impacts. Additionally, the Scoping Report omits essential details on supporting infrastructure such as roads, stormwater management, water supply, and electricity. These gaps raise serious concerns about regulatory compliance and environmental stewardship. **Operational and design concerns** MPC has fundamental objections to the proposed design, which duplicates existing facilities without clear justification. The following operational concerns may introduce environmental challenges and/or increase the risk of cross-contamination: • The 20-meter drop height into silos will generate fines and increase dust emission. This would also degrade product quality and create contamination risks. • The dust extraction system is designed to feed collected dust back into silos, compounding cross contamination issues rather than mitigating them.	

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			• Cross-contamination between different shippers and ore grades is highly likely due to silo reallocation and the absence of clear cleaning protocols before product discharge. **Technical errors in Scoping Report** The Scoping Report contains several inaccuracies and flawed assumptions that undermine its credibility and feasibility: • Rail siding ambiguity: The Scoping Report refers to a 'Transnet rail siding' without specifying which one, yet current yards in Saldanha are fully utilized by iron ore and Manganese Ore trains. • Incorrect wagon weight: The Scoping Report claims the current maximum weight per wagon including cargo is 120tons, with wagons containing 100 tonnes of ore. Whilst this may be true for Iron Ore, the maximum payload for Manganese Ore wagons is 67 tonnes per wagon given the rail infrastructure axle loads for the section Hotazel to Sishen. • Tippler 3: The Scoping Report assumes Tippler 3 will offload Manganese Ore. However, the tippler is under construction, indirectly financed by the Iron Ore producers and designated exclusively for Iron Ore. This tippler is not available for Manganese Ore. • Conveyor integration flaw: The design assumes conveyors from the hopper will feed silos, but Tippler 3 only connects to Iron Ore stockpiles in Bulk Terminal Station (BTS). The Scoping Report refers to a 'jetty' connection, but BTS berth is dedicated to Iron Ore and the multipurpose terminal has no provision for shiploading via conveyors. No servitudes or environmental approvals exist for this and there are no indications that there is a process being undertaken to have these in place.	

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			• Ship loading assumptions: The claim of loading two ships at 5,000 tph each or one at 10,000 tph demonstrates a lack of technical understanding of loading and de-ballasting rates. • Associated infrastructure: The Scoping Report omits critical details on site access, internal roads, stormwater management, water supply, and electricity, all of which are essential for operational viability **Conclusion** MPC strongly opposes the proposed development due to significant technical, operational, environmental, and regulatory shortcomings. It appears no consultation has taken place with Transnet Rail Infrastructure Manager (TRIM) and Transnet National Ports Authority (TNPA) which is a problem considering the commencement of a scoping exercise, which has raised unnecessary public concern in an environmentally sensitive area. An initiative of this nature will need to be backed by credible and viable underwriting from possible offtakers/producers for a 15-to-20-year period. There has been no consultation with Manganese Ore producers, which is flawed given that the producers are I&APs that would ultimately pay for a facility of this nature. MPC recommends that the environmental approval not be granted	
DEADP	Michelle Collins; Joy Learner	Director: Air Quality Management	The Directorate: Air Quality Management (hereafter 'the Directorate') has reviewed the above-mentioned Pre-Application Draft Scoping Report (hereafter 'the DSR') dated 31 October 2025, as received by the	This confirms receipt of your email and attached comments. Please note that an Air Quality Impact Assessment will be undertaken by a specialist. The pre-

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			Directorate on 31 October 2025. The Directorate has reviewed the documentation and has the following comments on the DSR in terms of the National Environmental Management: Air Quality Act No. 39 of 2004 (NEM: AQA): 1. AIR EMISSION IMPACT MANAGEMENT 1.1 It is noted the proposed facility will involve activities related to the storage and handling of manganese ore with an initial throughput capacity of 8 million tons of ore per annum (MTPA) and will be capable of handling up to 12MTPA of manganese throughput. 1.2 It is further noted that the facility will trigger the following NEM: AQA section 21 Listed Activity, with the West Coast District Municipality (WCDM) as the Licensing Authority for the related Atmospheric Emission Licence (AEL): 1.2.1 Category 5: 'Mineral Processing, Storage and Handling'; Subcategory 5.1: 'Storage and Handling of Coal and Ore' described as "Storage and handling of coal and ore not situated on the premises of a mine or works defined in the Mines Health and Safety Act 29 of 1996". 1.3 Potential air emissions will be in the form of dust, exhaust fumes from vehicles and machinery. 1.4 The applicant is reminded of Section 35 (2) of the NEM: AQA which states: "The occupier of the premises must take all reasonable steps to prevent the emission of any offensive	application Draft Scoping Report incorrectly references 'Air Quality Assessment' instead of 'Air Quality Impact Assessment'. This will be corrected in the post-application Draft Scoping Report. The AEL Licensing Authority, namely the WCDM, is aware of the applicant's intent to apply for Environmental Authorisation and an Atmospheric Emissions Licence.

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			odour caused by any activity on such premises." 1.5 It is also noted that a Health Impact Assessment will be conducted during the Environmental Impact Phase. 1.6 All potential air pollutants on site are to be investigated during the Environmental Impact Assessment phase. 2. DUST CONTROL MANAGEMENT 2.1 It is noted in the DSR that dust may be generated from the proposed activities on-site during the construction and operational phase. 2.2 It is further noted that an Air Quality Assessment will be conducted as part of the Environmental Impact Assessment. Clarity is requested whether this means that an Air Quality Impact Assessment will be undertaken, as this is required. 2.3 Dust generated from all the phases of the proposed activities must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013. 2.3.1 These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fallout, has a detrimental effect on the environment, including human health. 2.4 The Directorate recommends the following: 2.4.1 Measures to monitor and prevent fugitive dust emissions be investigated during the Environmental	

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			Impact Assessment phase. 2.4.2 Measures to assess the impact of potential fugitive dust emissions from the handling of ore be investigated. 3. NOISE CONTROL MANAGEMENT 3.1 Operational activities may cause significant noise on-site during the construction and operational phases. These activities may become a noise nuisance and/or disturbance to the adjacent communities. 3.2 It is noted that a Noise Impact Assessment will be undertaken during the Environmental Impact Assessment phase. 3.3 Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013. 3.4 The Directorate recommends the following: 3.4.1 Measures to minimise disturbing noise be investigated during the Environmental Impact Assessment phase. 4. GENERAL 4.1 Kindly be advised that the WCDM, as the AEL Licensing Authority, must be engaged. The Air Quality Officer at WCDM is Ms. Cindy Gantein-Bein, who can be reached on (022) 495 0744 or email: cgbein@wcdm.co.za. 4.2 The Saldanha Bay Municipality Air Quality Officer (Ms. Rene Toesie) must also be engaged regarding the proposed activity as it falls within the Municipality's jurisdictional areas. Ms. Rene Toesie can be reached on	

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			(022) 701 7052 or email: Rene.Toesie@sbm.gov.za. The Directorate would like to draw your attention to Section 28 of the National Environmental Management Act No. 107 of 1998 (NEMA), i.e. "Duty of Care" 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 authorized by law or cannot reasonably be avoided or stopped, to minimize and rectify such pollution or degradation of the environment." 4.4 Please note that the above-mentioned recommendations do not pre-empt the outcome of the application. 4.5 No information provided, views expressed and/or comments made by the Directorate should in any way be seen as an indication or confirmation: 4.5.1 that additional information or documents will 4.5.1 that additional information or documents will not be requested; or 4.5.2 of the outcome of any application submitted to the authorities. 4.6 Kindly be informed that the Directorate reserves the right to review the above-mentioned comments, should additional information come to light. Please contact myself or Etienne Roux	

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			(Etienne.Roux@westerncape.gov.za) should you have any further queries in this regard.	
Taryn Dreyer	DEA&DP		The pre-application draft Scoping Report and supporting documents as received by this Directorate via electronic mail correspondence on 31 October 2025, and this Directorate's acknowledgement thereof on 10 November 2025, refer. 2. The Directorate's comments on the pre-application draft Scoping Report are as follows: 2.1. Applicable Listed Activities: 2.1.1. This Directorate confirmed in the correspondence dated 12 September 2025 that although the conveyor exceeds a development foot of 50 square metres, and will be located within the existing footprint of the Saldanha Bay harbour, it was therefore agreed that Activity 17 and Activity 19A of Listing Notice 1 of the EIA Regulations, 2014 (as amended) are not applicable to the proposal. 2.2. Specialist Studies: 2.2.1. Aquatic Biodiversity Impacts: The Site Sensitivity Verification Report ("SSVR") dated 31 October 2025, and the site inspection conducted by Ms. I. van der Merwe of CEN Integrated Environmental Management Unit on 15 October 2025, confirmed that the proposed site does not contain any watercourses. However, an artificial wetland was identified on the adjacent property. The wetland is located within a distance of approximately 500m from the site. Thus, it is	

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			not anticipated that the proposed development will have any direct impact on the observed aquatic systems, given their proximity and the predominantly closed or contained infrastructure (such as silos and enclosed conveyors). It is understood that an Aquatic Biodiversity Verification and Assessment will be undertaken by Dr. Brian Colloty to assess the potential aquatic impacts associated with the proposal. 2.2.1.1. Page 25 of the Scoping Report indicates, "No watercourses, drainage lines or wetlands are mapped on the site in terms of the National Freshwater Ecosystem Priority Areas (NFEPA). The site is located in a strategic water source area and an aquatic assessment will be carried out on the site. The information from these reports will confirm if any general authorisation or water use license in terms of the NWA will be required for the project." Please ensure that comments are obtained from the Department of Water and Sanitation ("DWS") to confirm if a WULA is required. 2.2.2. Terrestrial Biodiversity Impacts and Plant Species: 2.2.2.1. A Terrestrial Biodiversity and Plant species Assessment will be undertaken to assess the potential impacts associated with the proposed development and to verify the 'Very High' sensitivity rating identified in the Screening Tool Report. 2.2.2.2. The proposed site falls within the Besaansklip Industrial Zone and in terms of the Saldanha Bay Strategic Offset Strategy,2020 and the Greater Saldanha Bay Environmental Management Framework, 2021, the	

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			proposed site falls within the 'Offset Required' Environmental Management Zone ("EMZ"). Therefore, an offset is required for proposed developments in this EMZ. Please ensure that the Plan of Study for EIA is updated to include an Offset Report in the list of specialist assessments to be conducted. 2.2.3. Agricultural Impacts: 2.2.3.1. Based on the SSVR dated 31 October 2025, the proposed site does not fall within any Agricultural protected area, and no agricultural activities are currently undertaken on site. In addition, the soil capability is classified as very low to low. 2.2.3.2. An Agricultural Compliance Statement has been compiled and the specialist agrees with the ratings of low to medium significance identified in the Screening Tool Report. 2.2.4. Heritage Impacts: According to the pre-application Scoping Report, an Archaeological & Cultural Heritage and Paleontological Screening Report and Assessment has been compiled by Jenna Lavin of CTS Heritage. A Notice of Intent to Develop was submitted to Heritage Western Cape ("HWC") in terms of Section 38 of the National Heritage Resources Act (Act No. 25 of 1999). HWC requested that a full Heritage Impact Assessment be conducted. 2.3. General 2.3.1. The phrase "(Error! Reference source not found)" on page 1 of the draft Scoping Report needs to be corrected.	

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			2.3.2. Page 77 of the Scoping Report refers to Appendix A: Copy of the EAP's Curriculum Vitae. However, since this is not included in the main Scoping Report document and attached separately, please indicate attached separately. 2.3.3. Page 78 of the Scoping Report refers to Appendix B: DFFE Screening Report & Site Verification Report. However, since this is not included in the main Scoping Report document and attached separately, please indicate attached separately. 3. Public Participation Process 3.1. Please ensure that the comments raised during the Public Participation Process are adequately addressed, prior to the initiation of the formal EIA process. 3.1.1. The Public Participation Process must fulfil the requirements outlined in Chapter 6 of the EIA Regulations, 2014 (as amended). Proof of having complied with the said requirements must be included in future reports that will be submitted to this Department. 3.1.2. Although the proposal is still in the pre-application phase, you are advised to obtain comments from the relevant authorities. This will allow issues raised to be addressed and/or resolved during the pre-application phase. This includes comments from, but not limited to, the following relevant authorities during the Public Participation Process: • Department of Environmental Affairs and Development Planning (DEA&DP): Pollution & Chemicals Management (Contact Person: Ms. Natasha Davis-Wolmarans (Natasha.Davis-Wolmarans@westerncape.gov.za);	

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			• DEADP: Waste Management (Contact Person: Mr. Saliem Haider (Saliem.Haider@westerncape.gov.za) and Mr. Lance McBain-Charles Lance.McBainCharles@westerncape.gov.za); • DEA&DP: Air Quality Management (Dr. Joy Leaner (Joy.Leaner@westerncape.gov.za and Mr. Etienne Roux (Ettienne.Roux@westerncape.gov.za); • Western Cape Department of Agriculture; • HWC; • CapeNature; • The DWS (Contact person: Ms. Nelisa Ndobeni (NdobeniN2@dws.gov.za) or Mr. Derril Daniels (DanielsD@dws.gov.za); • Western Cape Department of Infrastructure; • West Coast District Municipality; • Saldanha Bay Municipality; • SANRAL; • National Department of Transport & Public Works; and • Transnet. 4. Content requirements 4.1. Please ensure that the SR and Plan of Study for EIA meet all of the content requirements in terms of Appendix 2 of the EIA Regulations, 2014 (as amended). 4.2. You are reminded that the Scoping and EIA phases of the EIA process are two distinctly separate phases, each having its own requirements and reports to be submitted. The Department will not accept Scoping and EIA Reports	

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			where the processes or information of the two phases were combined into a single process or report. 5. You are reminded that it is prohibited in terms of Section 49A of the NEMA for a person to commence with a Listed Activity unless the Competent Authority has granted an Environmental Authorisation for the undertaking of the activity. Non-compliance in terms of the prohibition must be referred to the Department's Directorate: Environmental Law Enforcement for possible prosecution. A person convicted of an offence in terms of the above is liable for a fine not exceeding R10 000 000 or to imprisonment for a period not exceeding 10 years, or to both such fine and imprisonment. 6. Kindly quote the abovementioned reference number in any future correspondence in respect of the preapplication. 7. This Department reserves the right to revise or withdraw comments and request further information based on any information received.	

9 CHAPTER 9: CONCLUSION AND RECOMMENDATIONS

9.1 CONCLUSION

A number of potential impacts have been highlighted for further investigation in order to assess their significance, and to determine the need for the implementation of mitigation measures in order for the overall project to be environmentally sustainable.

9.2 RECOMMENDATIONS

It is, therefore, recommended that the studies be conducted for the proposed project in the EIA Phase, as described in the Plan of Study for EIA.

It is recommended that the Scoping Report be approved by the DEADP, and that permission be granted to continue with the EIA Phase of the process.

REFERENCE LIST

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- Draft Second (2nd) Review and Amendment of the 5th Generation Integrated Development Plan, Saldanha Bay Municipality 2022 – 2027
- De Villiers CC, Driver A, Clark B, Euston-Brown DIW, Day EG, Job N, Helme NA, Holmes PM, Brownlie S and Rebelo AB (2005) Fynbos Forum Ecosystem Guidelines for Environmental Assessment in the Western Cape. Fynbos Forum and Botanical Society of South Africa, Kirstenbosch
- DFFE (2022). Draft National Biodiversity Offset Guideline. Department of Forestry, Fisheries and the Environment. Government Gazette No. 46088, 25 March 2022
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- Final Environmental Impact Assessment Report: Newlyn Manganese Storage and Conveyor Facility in the Coega Special Economic Zone, Nelson Mandela Bay Municipality, Eastern Cape DEDEAT Reference No: Ecm1/C/Ln2/M/20 2020, Cen IEM Unit, 2021
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- International Council for Local Environmental Initiatives. (1994). Local Agenda 21 Handbook. 42 pp.
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- The Saldanha Strategic Offset Strategy, DEADP, WC, 2021

APPENDIX A: CURRICULA VITAE

APPENDIX B: DFFE SCREENING REPORT & SITE SENSITIVITY VERIFICATION REPORT

APPENDIX C: TERRETRIAL BIODIVERSITY SCREENING REPORT

APPENDIX D: COMMENTS AND RESPONSE REPORT

March 2026