

APPENDIX D: COMMENTS AND RESPONSE REPORT

CEN INTEGRATED ENVIRONMENTAL MANAGEMENT UNIT

Environmental and Rural Development Specialist

Public Participation Report:

**Proposed development and operation of a bulk mineral ore
storage terminal and conveyors
Saldanha Bay Local Municipality**

DEA&DP NOI Reference: 16/3/3/6/7/2/f4/17/3147/25

December 2025

Public Participation Report: Pre-Application Draft Scoping Report

PROPOSED DEVELOPMENT OF A MINERAL ORE STORAGE TERMINAL AND CONVEYORS SALDANHA BAY MUNICIPALITY, WEST COAST DISTRICT MUNICIPALITY, WESTERN CAPE

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REVISIONS TO THE SCOPING REPORT

Version	Date	Comment
0	31 October 2025	Public Participation Report: Pre-Application Draft Scoping Report

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Chapter 1: Public Participation Process

1.1 Purpose

In terms of the National Environmental Management Act, 1988 (act 107 of 1998) public participation process is a process by which potential interested and affected parties are given opportunity to comment on, or raise issues relevant to an application.

At a minimum, the PPP undertaken must allow for the following:

- to provide for the opportunity for all role players including potential and RI&APs, EAPs, state departments, organs of state, and the competent authority (CA) to obtain clear, accurate and understandable information about the environmental impacts of the proposed activity or implications of a decision;
- to provide for role- players to voice their support, concerns and questions regarding the project, application or decision;
- to provide the opportunity for role-players to suggest ways for reducing or mitigating any negative impacts of the project and for enhancing its positive impacts;
- to enable the person conducting PP to incorporate the needs, preferences and values of potential or RI&AP's into its proposed development that becomes the subject of an application for an environmental authorization (EA);
- to provide opportunities for clearing up misunderstandings about technical issues, resolving disputes and reconciling conflicting interests;
- to encourage transparency and accountability in decision-making;
- to contribute toward maintaining a healthy, vibrant democracy; and
- to give effect to the requirement for procedural fairness of administrative action as contained in the Promotion of Administrative Justice Act, 2000 (Act No. 3 of 2000).

1.2 Objectives

The objectives of the Public Participation Process (PPP) can be summarised as follows:

- Identify relevant individuals, organisations and communities who may be interested in or affected by the project.
- Clearly outline the scope of the proposed Project, including the scale and nature of the existing and proposed activities.
- Identify viable proposed Project alternatives that will assist the relevant authorities in making an informed decision.
- Identify shortcomings and gaps in existing information.
- Identify key concerns, raised by I&APs that should be addressed in the subsequent specialist studies.
- Highlight the potential for environmental impacts, whether positive or negative.
- To inform and provide the public with information and an understanding of the proposed Project, issues, and solutions.

Chapter 2: Public Participation to Date

2.1 Pre-Application Phase Engagement

Tasks undertaken during the pre-application phase are detailed in the following Sections.

2.2 Identification of Key Stakeholders

The Pre-application Phase commenced with the compilation of a stakeholder database to include relevant stakeholders, such as CAs, landowners/users, Ward Councillors, surrounding landowners/users and businesses, as well as any other I&APs who may be interested or affected by the project.

Relevant authorities (organs of state) have been automatically registered as stakeholders. In accordance with the EIA Regulations, 2014 (as amended), all other persons must request in writing to be placed on the register, submit written comments, or attend meetings in order to be registered as stakeholders and included in future communication regarding the project.

2.3 Availability of Pre-Application Draft Scoping Report

The Pre-application Draft Scoping Report was placed on public review from 31 October until 8 December 2025. An electronic version of the report was placed on CEN IEM Unit's website to be accessed by the public at the following link: <https://environmentcen.co.za/projects/>

2.3.1 Direct Notification

Notification of the proposed project and commencement of the 30-day PPP period was issued to stakeholders, via direct correspondence (i.e., email) on 31 October 2025. The purpose of the notification was to offer stakeholders the opportunity to register on the project database and the opportunity to comment on the Pre-application Draft Scoping Report. Proof of notification is included in the Appendix 3.

2.3.2 Newspaper Advertisement

Notification of the proposed project as well as the opportunity to comment on the Pre-application Draft Scoping Report was issued to the general public via an advertisement published in the Die Burger and Die Weslander newspapers on 31 October 2025 and 7 November 2025, in Afrikaans and English respectively. The purpose of the advertisement was to notify the general public of the proposed project and to provide an opportunity to register on the project database and provide input into the process through the availability of the Pre-application Draft Scoping Report. A copy of the advertisement is included in Appendix 2: **Newspaper Adverts**.

2.3.3 Site Notices

Two site notices were each placed at the proposed site at the current access point off the MR560 as well as adjacent the MR560 across from where the proposed silos will be located. See Appendix 1.

Chapter 3: Comments and Responses

All comments received from stakeholders on the draft BAR have been captured and responded to within Table 3-1. The original comments and responses are included in Appendix 5.

Table 3-1: Comments and Responses

Name	Organisation / Role	City / Town / District	Comment Received	Response
Emily Vowles	HWC			
Jerome Vraagom	V and Sons Pty Ltd			
Magnus van Rooyen	Ecolink		<p>Email 1: Request to be registered as an IAP and requested that all information generated during the process be provided.</p> <p>Email 2: Who is the Pre-application Scoping Report being circulated to?</p> <p>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.</p> <p>Can I please be provided with a layout plan for the facility as well as the transport routes as quoted in the newspaper advert?</p> <p>Can clarity please be provided as to what mineral will be handled by the facility?</p> <p>Can copies of the Application for Environmental Authorisation as well as the Air Emissions Licence Application Form be provided to me?</p>	<p>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.</p> <p>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.</p> <p>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. 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.</p>

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				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	<p>Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay</p> <p>The SWQT (Saldanha Water Quality Trust) would like to be included in the EIA process and comment on the current documentation available.</p> <p>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 tourism around the bay.</p> <p>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.</p>	<p>Your comment and request to be registered as an Interested and Affected Party (IAP) is noted.</p> <p>Would you like me to add the email addresses copied in this email to the registered IAP database as well?</p> <p>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.</p> <p>An Air Quality Specialist has been appointed to conduct an assessment.</p> <p>The pre-application Draft Scoping Report is available for public review and comment on CEN 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.</p>
Kyle Dods	Red Dust Action Group	Saldanha	<p>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?</p> <p>We also ask that you please register the following individuals of our organisation with effect: Mark West; Hein Witte; Adam Scholtz; Brian Blackbeard; Kyle Dods.</p> <p>Our RDAG Advisory Committee has also been copied into this correspondence and may request individual</p>	<p>Good Afternoon Mr Dods</p> <p>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.</p> <p>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</p>

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			<p>registration.</p> <p>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 regarding transparency, accessibility, and whether the process has been structured in a manner that limits meaningful public participation.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>The key stakeholders identified as part of this public participation process were the competent 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.</p> <p>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.</p> <p>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.</p> <p>Your concern regarding the 30 day public participation process is noted. Please note that there are no South African Public Holidays within this public participation period. We note your request for an extension of the public comment period. Although we understand the need, the DEA&DP</p>

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				<p>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).</p> <p>Thank you for your participation in the process. We look forward to your continued participation.</p>
C Benton	West Coast District Municipality -	WCDM	<p>Thank you for including this office, who is also the licencing authority in terms of the atmospheric emission licence, as an I&AP.</p> <p>With reference to the pre-application scoping report, please find attached comments from this office.</p> <p>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 Cjinnar@wcdm.co.za.</p> <p>As per section 22 of the NEM:AQA, no person may conduct a listed activity without an atmospheric emission licence. Consequences as per Section 22A of the NEM:AQA will be applied if such unlawful activity takes place.</p> <p>The applicant must submit to this office the granted environmental authorisation.</p> <p>The applicant must submit to this office the following studies in order for this office to make informed decisions:</p> <ul style="list-style-type: none"> • 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 	

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			<p>It is required of the applicant to apply the National dust control regulations during the construction and operational phases.</p> <p>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.</p>	
Ismat Adams	Cape Nature		<ol style="list-style-type: none"> 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 of the National Biodiversity Offset Guidelines. 	<p>Thank you for your comment.</p> <p>Please note that public participation has been extended until 8 December 2025.</p> <p>We look forward to your continued participation in the process.</p>
Hugo Tallie			<p>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).</p> <p>I hereby request to be registered as an I&AP in order to review the application, and kindly request clarity on the following points:</p> <ul style="list-style-type: none"> • 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); 	<p>Email 1:</p> <p>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.</p> <p>The concerns and queries in your correspondence is noted.</p> <p>We will respond soonest with the information as requested.</p> <p>We look forward to your participation in the process.</p> <p>Email 2:</p> <p>The current zoning of the proposed site is Agricultural, and rezoning to Industrial is pending.</p> <p>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.</p> <p>These changes will be reflected in the EA Application as well as the Post-application Scoping Report.</p> <p>The applicant is in the process of applying for</p>

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			<ul style="list-style-type: none"> 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 Implementation Framework (RSIF) for the Greater Saldanha Region. <p>Kind regards Email 2: Thanks for the info, please also confirm if Transnet has approved this site as an extra Back of Port facility.</p>	<p>consent from the Saldanha Bay Municipality. A specialist will be appointed to conduct a biodiversity offset study and to identify appropriate 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.</p>
Ore export corridor Users Forum (Pty) Ltd	Henk Bester		<p>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.</p> <p>Please let us know should you require any further clarification or engagement on the matters raised.</p> <p>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 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</p>	<p>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 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</p>

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			<p>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.</p> <p>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).</p> <p>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:</p> <ul style="list-style-type: none"> • Capacity, reliability, or safety of rail and port operations; • Allocation or reallocation of rail and port 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). <p>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.</p> <p>Our review of the document has identified several material inaccuracies, technical inconsistencies, and omissions. These issues collectively raise concerns about the feasibility,</p>	<p>Listed Activities that may be triggered by the proposed development.</p> <p>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.</p>

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			<p>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:</p> <p>Fundamental operational assumptions used are incorrect The project description is based on assumptions that are factually inaccurate and inconsistent with current operations at Saldanha:</p> <ul style="list-style-type: none"> • The document incorrectly states that manganese ore wagons carry 120 tons, whereas the current actual maximum payload is 67 tons (based on maximising type 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. <p>Collectively, these inaccuracies indicate a limited understanding of the operational realities, constraints and technical requirements of the existing heavy haul and port system</p> <p>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 and does not incorporate any provision for handling manganese or other</p>	

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			<p>commodities.</p> <p>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.</p> <p>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.</p> <p>Environmental sensitivities and inadequate assessment of NEMA-listed activities</p> <p>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.</p> <p>In this context, plans to clear large areas for new silos, 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.</p> <p>Additionally, the Scoping Report's evaluation of NEMA-listed activities is incomplete and inaccurate, misapplying listed activities and overlooking cumulative effects from</p>	

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			<p>new and existing developments in Saldanha Bay.</p> <p>Lack of consultation with key stakeholders</p> <p>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.</p> <p>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 of the broader environmental assessment process.</p> <p>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.</p>	
Manganese Producers Consortium	Henk Bester		<p>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</p>	<p>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.</p> <p>Your written comment on the pre-application Draft Scoping Report will be included and addressed in the post-application Draft Scoping Report.</p> <p>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</p>

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>the proposed facility. Set out below are our contract details for purposes of registering the MPC as an I&AP:</p> <ul style="list-style-type: none"> • 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. • Project Reference: Pre-application draft Scoping Report – proposed development and operation of a bulk mineral ore storage terminal and conveyors, Saldanha. <p>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:</p> <ul style="list-style-type: none"> • Assmang Proprietary Limited. • Kudumane Manganese Resources Proprietary Limited (KMR). • Hotazel Manganese Mines Proprietary Limited (Part of South32). • Tshipi éNtle Manganese Mining Proprietary Limited. <p>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.</p> <p>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 feasibility of the proposed facility. Furthermore, the approach, which is</p>	<p>corrected in the post-application Draft Scoping Report.</p> <p>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, thereby reducing the associated environmental impact. These changes will be reflected in the EA Application as well as the Post-application Draft Scoping Report.</p> <p>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.</p> <p>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.</p>

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>neither substantiated by facts nor supported by in-principle agreements, creates more problems and unnecessary panic in the West Coast Community</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. • 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. <p>Technical errors in Scoping Report The Scoping Report contains several inaccuracies and flawed assumptions that undermine its credibility and feasibility:</p> <ul style="list-style-type: none"> • 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. 	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<ul style="list-style-type: none"> • 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. • 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 <p>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.</p>	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>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.</p> <p>MPC recommends that the environmental approval not be granted</p>	
DEADP	Michelle Collins; Joy Learner	Director: Air Quality Management	<p>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 Directorate on 31 October 2025.</p> <p>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):</p> <p>1. AIR EMISSION IMPACT MANAGEMENT</p> <p>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.</p> <p>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):</p> <p>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”.</p> <p>1.3 Potential air emissions will be in the form of dust, exhaust fumes from vehicles and machinery.</p> <p>1.4 The applicant is reminded of Section 35 (2) of the NEM: AQA which states:</p> <p>“The occupier of the premises must take all reasonable</p>	<p>This confirms receipt of your email and attached comments.</p> <p>Please note that an Air Quality Impact Assessment will be undertaken by a specialist. The pre-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.</p> <p>The AEL Licensing Authority, namely the WCDM, is aware of the applicant’s intent to apply for Environmental Authorisation and an Atmospheric Emissions Licence.</p>

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>steps to prevent the emission of any offensive odour caused by any activity on such premises.”</p> <p>1.5 It is also noted that a Health Impact Assessment will be conducted during the Environmental Impact Phase.</p> <p>1.6 All potential air pollutants on site are to be investigated during the Environmental Impact Assessment phase.</p> <p>2. DUST CONTROL MANAGEMENT</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>2.4 The Directorate recommends the following:</p> <p>2.4.1 Measures to monitor and prevent fugitive dust emissions be investigated during the Environmental Impact Assessment phase.</p> <p>2.4.2 Measures to assess the impact of potential fugitive dust emissions from the handling of ore be investigated.</p> <p>3. NOISE CONTROL MANAGEMENT</p> <p>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.</p> <p>3.2 It is noted that a Noise Impact Assessment will be undertaken during the Environmental Impact Assessment phase.</p>	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>3.3 Noise generated on site from all the proposed activities must comply with the Western Cape Noise Control Regulations Provincial Notice 200/2013.</p> <p>3.4 The Directorate recommends the following:</p> <p>3.4.1 Measures to minimise disturbing noise be investigated during the Environmental Impact Assessment phase.</p> <p>4. GENERAL</p> <p>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.</p> <p>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 (022) 701 7052 or email: Rene.Toesie@sbm.gov.za.</p> <p>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:</p> <p>"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."</p> <p>4.4 Please note that the above-mentioned recommendations do not pre-empt the outcome of the application.</p> <p>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:</p> <p>4.5.1 that additional information or documents will</p> <p>4.5.1 that additional information or documents will not be requested; or</p> <p>4.5.2 of the outcome of any application submitted to the authorities.</p> <p>4.6 Kindly be informed that the Directorate reserves the</p>	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>right to review the above-mentioned comments, should additional information come to light. Please contact myself or Etienne Roux (Etienne.Roux@westerncape.gov.za) should you have any further queries in this regard.</p>	
Taryn Dreyer	DEA&DP		<p>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.</p> <p>2. The Directorate's comments on the pre-application draft Scoping Report are as follows:</p> <p>2.1. Applicable Listed Activities:</p> <p>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.</p> <p>2.2. Specialist Studies:</p> <p>2.2.1. Aquatic Biodiversity Impacts:</p> <p>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 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.</p> <p>2.2.1.1. Page 25 of the Scoping Report indicates, "No</p>	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>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.</p> <p>2.2.2. Terrestrial Biodiversity Impacts and Plant Species:</p> <p>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.</p> <p>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 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.</p> <p>2.2.3. Agricultural Impacts:</p> <p>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.</p> <p>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.</p> <p>2.2.4. Heritage Impacts:</p> <p>According to the pre-application Scoping Report, an Archaeological & Cultural Heritage and Paleontological Screening Report and Assessment has been compiled by</p>	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>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.</p> <p>2.3. General</p> <p>2.3.1. The phrase “(Error! Reference source not found)” on page 1 of the draft Scoping Report needs to be corrected.</p> <p>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.</p> <p>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.</p> <p>3. Public Participation Process</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • Department of Environmental Affairs and Development Planning (DEA&DP): Pollution & Chemicals Management (Contact Person: Ms. Natasha Davis-Wolmarans (Natasha.Davis-Wolmarans@westerncape.gov.za); • DEADP: Waste Management (Contact Person: Mr. Saliem Haider (Saliem.Haider@westerncape.gov.za) and Mr. Lance 	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			<p>McBain-Charles Lance.McBainCharles@westerncape.gov.za);</p> <ul style="list-style-type: none"> • 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. <p>4. Content requirements</p> <p>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).</p> <p>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 where the processes or information of the two phases were combined into a single process or report.</p> <p>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.</p> <p>6. Kindly quote the abovementioned reference number in</p>	

Name	Organisation / Role	City / Town / District	Comment Received	Response
			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.	

Chapter 4: Way Forward

The Pre-application Draft Scoping Report was subjected to a PPP during 31 October to 8 December 2025. The EIA Application will be finalised and submitted to DEA&DP. Thereafter the Post-Application Draft Scoping Report will be made available for PPP.

All stakeholders will be notified via email of the availability of the post-application Draft Scoping Report.

Appendix 1: Site Notices



Figure 1: The site notice next to the MR560



Figure 3: The site notice placed at the current access point to the property off the MR560



Figure 4: The placement of the two site notices

Appendix 2: Newspaper Adverts

PRE-APPLICATION NOTICE OF PUBLIC PARTICIPATION

Notice is hereby given that Newfields Investments will be applying for an Environmental Authorisation for the proposed development and operation of a mineral ore storage and handling facility on Farm RE/1139, Saldanha Bay Municipality, Western Cape, in terms of the Environmental Impact Assessment (EIA) Regulations, 2014, as amended. This application will be done in terms of activities listed in Government Notice R.327, R.324 of 7 April 2017, published in terms of Section 24(5) of the National Environmental Management Act, 1998, as amended. The proposed activities require that a Scoping and Environmental Impact Assessment process be undertaken and the relevant authority is the Department of Environmental Affairs and Development Planning (DEADP).

The Applicant will also apply for an Atmospheric Emissions Licence as required for air quality listed activities in terms of the National Environmental Management: Air Quality Act (Act No. 39 of 2004).

The relevant air quality listed activities relate to Category 5, Sub-category 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 29/1996".

The pre-application Scoping Report will be available for a 30 day public participation period from 31 October 2025 until 30 November 2025.

Locality: The proposed storage and handling facility is proposed to be situated on approximately 33 ha on the northernmost section of Farm RE/1139, Saldanha Bay, situated in the Saldanha Bay Local Municipality, Western Cape. The conveyor component will traverse the following properties: Farm 1139, Farm Nr: 1/1139; Yzervarkensrug, Farm Nr: 17/127; Pienaars Poort, Farm Nr: 16/197; Pienaars Poort, Farm Nr: 14/197; Pienaars Poort, Farm Nr: 8/197; Pienaars Poort, Farm Nr: 15/197; State Land, Farm Nr: 196, and FARM 1185.

Environmental Consultant: CEN Integrated Environmental Management Unit

Dr Mike Cohen / Irma Van der Merwe; Telephone: 082 320 3111 / 083 238 5911. Fax: 086 504 2549

E-mail: steenbok@aerosat.co.za / irma@environmentcen.co.za

Interested and Affected Parties: Interested and Affected Parties are invited to participate in the process by registering and submitting detailed written comment on the proposed activities within 30 days of this notice (i.e. by 30 November 2025) to the contact details above. A copy of the pre-application Scoping Report is available on CEN IEM Unit's website: www.environmentcen.co.za/

Figure 01: Weslander Advert, 31 October 2025

**Appendix 3: Distribution of Notifications for the Pre-application
Draft Scoping Report**

TO	SUBJECT	SENT	SIZE
Date: Today			
'Townplanning@sbm.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'info@cwctr.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'admin@weskusakakamer.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Chairman.simere@sanparks.org'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Chief.maart@cochoqua.org.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'brian.stander@dpw.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'adamd@nra.co.za'; 'info@nra.co.za'; 'gou...	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'PublicParticipation@sbm.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'wards@sbm.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'mun@sbm.gov.za'; 'Nateema.Duarte@sb...	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'cgbein@wcdm.co.za'; 'cjinnaar@wcdm...	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'dktotze@wcdm.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'westcoast@wcdm.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'mun@wcdm.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Jerome.vraagom'	RE: PRE APPLICATION NOTICE OF PUBLIC PARTICIPATION FARM RE/1739, SALDANHA BAY	Fri 2025-10-31 09:...	484 KB
Good afternoon Jerome I trust you are well. Kindly note that you have been registered as an interested and affected party for the proposed bulk storage terminal on Farm RE/1739			
'info@sbidc.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'DreyerW@dva.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	944 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'abeepi@theob.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'aacha@eskom.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'ShalanAR@eskom.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 09:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		

ima@environmentcen.co.za

TO	SUBJECT	SENT	SIZE
'SiyongZA@eskom.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 03:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Emily Vowias; 'Cocheritage'; andrew.sap...'	RE: Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore St...	Fri 2025-10-31 03:...	80 KB
Good Afternoon. Thank you for confirming receipt. The request for a full HIA is noted and the specialist has been appointed to conduct a full HIA, inclusive of an AIA and PIA.			
'hibanaS@eskom.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 03:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Adela.Groenewald@transnet.net'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 03:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Raymond.VanRooyen@transnet.net; 'Nic...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 03:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'mwheller@capenature.co.za'; 'adams@...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 03:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'HOD.TransportPublicWorks@westerncap...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Joy.leaher@westerncape.gov.za'; 'EMaho...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'jgoosen@pgwc.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Johan.Gooßen@westerncape.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'snomdo@pgwc.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'MagodlaZ@dvs.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'DreyerW@dvs.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Cocheritage@westerncape.gov.za'; 'Emil...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'corvdw@elsenburg.co.za'; 'anduse.elsen...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'ahanekom@westerncape.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Saleem.Haider@westerncape.gov.za'; 'Lan...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	478 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Arabel.McClland@westerncape.gov.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Nazzeema.Duarte@sbm.gov.za'; 'Ryan.Gr...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Thamba.Silinda'	RE: Request for a List of Authorities in the Saldanha Bay Area	Fri 2025-10-31 02:...	93 KB
Dear Thamba: Thank you for your assistance. It is greatly appreciated. Kind regards, Irma van der Merwe			

TO	SUBJECT	SENT	SIZE
'manager@sbwqft.org.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 02:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'jeremp@spingroup.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 11:...	2 MB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'jeremp@spingroup.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 11:...	2 MB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'chrissiecordier@gmail.com'; 'zhanmaina...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 11:...	478 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'sales@dularco.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 11:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'johan@westanco.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 11:...	475 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'yrene@antcor.co.za'; 'corne@antcor.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 10:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'mailto:communication@pindulovdm.co.z...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 10:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'denick@shipwrightservices.co.za'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 10:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Oiwethu.Mdabula@transnet.net'; 'Mbal...'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 10:...	477 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'info@avedaenergy.com'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 10:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'hardie.debeer@za.afriam.com'	Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage...	Fri 2025-10-31 10:...	476 KB
Dear Interested and Affected Party / Organ of State	Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage		
'Themba Silinda'; Taryn Dreyer	16/3/3/6/7/2/F4/17/3147/2 - Newfields Pre-Application Scoping Report	Fri 2025-10-31 10:...	6 MB
Good morning Themba and Taryn. Please find attached the pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay. This			
'Lucille Behrens'	RE: Pre-Application Scoping Report PPP	Fri 2025-10-31 10:...	24 KB
Hi Lucille. Thank you so much. Appreciate it. Hoping I receive it very soon. Thanks Irma			
'lucille@environmentccn.co.za'	Pre-application Scoping Report Saldanha Newfields	Fri 2025-10-31 09:...	12 MB
Hi Lucille. As promised, see attached the word document for the pre-application scoping report for Saldanha. Thank you for all your help. Kind regards Irma van der Merwe <end>			
'lucille@environmentccn.co.za'	Pre-Application Scoping Report PPP	Fri 2025-10-31 09:...	8 MB
Hi Lucille. Please see attached the pre-application scoping report and appendices. Could you kindly add it to the website for public participation (31 October 2025 until 1 December			
Date: Yesterday			
'Irma van der Merwe'		Thu 2025-10-30 0:...	35 KB
Kind regards Irma van der Merwe <end>			
'lucille@environmentccn.co.za'	SG Codes - Saldanha Neighbours	Thu 2025-10-30 0:...	38 KB
Hi Lucille. See attached the SG codes of neighbours for Saldanha. Will you please check if there is any contact details on windeed? I am finalising the Scoping Report and SSVR.			
'Jerome vraagom'	RE: PRE APPLICATION NOTICE OF PUBLIC PARTICIPATION FARM RE/1139, SALDANHA BAY	Thu 2025-10-30 0:...	24 KB
Good afternoon Jerome. Thank you for your email. The pre-application Scoping Report will be released for public participation tomorrow and the comment and review period will			
'Themba Silinda'	Newfields Bulk Mineral Ore Terminal Saldanha Bay 16/3/3/6/7/2/F4/17/3147/2 - Confirmation of con...	Thu 2025-10-30 0:...	35 KB
Good afternoon Themba. I trust you are well. I would greatly appreciate it if you could have a look at the list of officials and corresponding contact information. Please let me know			

irma@environmentccn.co.za

Appendix 4: Submitted Comments

REFERENCE: 16/3/3/6/7/2/F4/17/3147/25
DATE: 10 December 2025

The Director
Newfields Investments (Pty) Ltd
P. O. Box 17354
Congella
4013

Attention: Mr. Rajendra Balmakhun

Tel: (031) 313 6500

E-mail: kirushag@newlyngroup.com

Dear Sir

COMMENT ON THE PRE-APPLICATION DRAFT SCOPING REPORT IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 (ACT NO. 107 OF 1998) ("NEMA") AND THE ENVIRONMENTAL IMPACT ASSESSMENT ("EIA") REGULATIONS, 2014 (AS AMENDED) FOR THE PROPOSED DEVELOPMENT OF THE NEWFIELDS BULK MINERAL ORE STORAGE, HANDLING FACILITY AND ASSOCIATED INFRASTRUCTURE ON THE REMAINDER OF FARM NO. 1139, SALDANHA BAY.

1. 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 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 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.

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));

- DEADP: Waste Management (Contact Person: Mr. Salim Haider (Salim.Haider@westerncape.gov.za) and Mr. Lance McBain-Charles (Lance.McBain-Charles@westerncape.gov.za);
- DEA&DP: Air Quality Management (Dr. Joy Leaner (Joy.Leaner@westerncape.gov.za) and Mr. Etienne Roux (Etienne.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 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 pre-application.
7. This Department reserves the right to revise or withdraw comments and request further information based on any information received.

Yours faithfully

Taryn Dreyer
 Digitally signed
 by Taryn Dreyer
 Date: 2025.12.10
 13:11:19 +02'00'

pp **MR. ZAAHIR TOEFY**
DIRECTOR: DEVELOPMENT MANAGEMENT (REGION 1)

Copied in:

- 1) Nazeema Duarte (Saldanha Bay Local Municipality)
- 2) Lucille Behrens (CEN-EMU)
- 3) AfriSam SA (Pty) Ltd (Landowner)

E-mail: nazeema.duarte@sbm.gov.za

E-mail: Lucille@environmentcen.co.za/irma@environmentcen.co.za

E-mail: hardie.debeer@za.afrisam.com

Reference: 19/4/4/1/BS1 (BULK MINERAL ORE TERMINAL ON FARM RE/1139 – SALDANHA BAY)

ENQUIRIES: Etienne Roux

For Attention: Ms Irma van der Merwe

CEN Integrated Environmental Management Unit
36 River Road
Walmer
Port Elizabeth
6070

Email: irma@environmentcen.co.za

Tel: (041) 581 2983

Cell: 083 238 5911

PRE-APPLICATION DRAFT SCOPING REPORT (DSR) FOR THE PROPOSED BULK MINERAL ORE TERMINAL (STORAGE AND HANDLING FACILITY) ON FARM RE/1139, SALDANHA BAY

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 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 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 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 (022) 701 7052 or email: Rene.Toesie@sbm.gov.za.

- 4.3 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 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 (Etienne.Roux@westerncape.gov.za) should you have any further queries in this regard.

Yours faithfully,

Joy Leaner Digitally signed by Joy
Leaner (50760726)
Date: 2025.12.05
11:28:38 +0200
(50760726)

DR JOY LEANER (PhD)
DIRECTOR: AIR QUALITY MANAGEMENT
PROVINCIAL AIR QUALITY OFFICER: WESTERN CAPE

cc: Etienne Roux (DEA&DP)
cc: Cindy Gantein-Bein (WCDM)
cc: Rene Toesie (Saldanha Bay Municipality)

email: Etienne.Roux@westerncape.gov.za
email: cgbein@wcdm.co.za
email: Rene.Toesie@sbm.gov.za

Postal PO Box 26, Porterville, 6810
Physical 72 Voortrekker Street, Porterville, 6810
Website www.capenature.co.za
Enquiries Ismat Adams
Telephone 0870873188
Email isadams@capenature.co.za
Reference SSD14/2/6/1/8/4/_RE/1139_Newfields_Saldanha
Date 02 December 2025

CEN Integrated Environmental Management Unit

Via email: irma@environmentcen.co.za

Attention: Ms I van der Merwe

Dear Ms van der Merwe

RE: PRE-APP DSR - PROPOSED DEVELOPMENT AND OPERATION OF A BULK MINERAL ORE STORAGE TERMINAL AND CONVEYORS SALDANHA BAY MUNICIPALITY

Competent authority ref: 16/3/3/6/7/2/F4/17/3/47/25

Herewith CapeNature's comment on this application.

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 of the National Biodiversity Offset guidelines.

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

Kind regards,

Ismat Adams Digitally signed by Ismat Adams
Date: 2025.12.02 12:11:00 +0200

Land-Use Scientist: Landscape West
Conservation Operations

Cc: kirushag@newlyngroup.com

Subject: Newfields Investments (Pty) Ltd: Pre-application Draft Scoping Report for Public Participation

Dear Kirusha and Irma,

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 Implementation Framework (RSIF) for the Greater Saldanha Region.

Kind regards

Hugo Tallie

0760302132

Irma Van der Merwe

From: Hugo Afei <hugo@afei.co.za>
Sent: 08 December 2025 02:44 PM
To: irma@environmentcen.co.za
Subject: RE: Newfields Investments (Pty) Ltd: Pre-application Draft Scoping Report for Public Participation

Hi Irma

Thanks for the info, please also confirm if Transnet has approved this site as an extra Back of Port facility.

Regards

Hugo Tallie

From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: 04 December 2025 15:27
To: 'Hugo Afei' <hugo@afei.co.za>
Subject: RE: Newfields Investments (Pty) Ltd: Pre-application Draft Scoping Report for Public Participation

Good afternoon Hugo

I trust you are well.

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 land should a biodiversity offset be required.

Thank you for your participation.

Kind regards

Irma van der Merwe

From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: 21 November 2025 04:46 PM
To: 'Hugo Afei' <hugo@afei.co.za>
Cc: 'kirushag@newlyngroup.com' <kirushag@newlyngroup.com>
Subject: RE: Newfields Investments (Pty) Ltd: Pre-application Draft Scoping Report for Public Participation

Good afternoon Hugo

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.

Kind regards

Irma van der Merwe

From: Hugo Afei <hugo@afei.co.za>
Sent: 20 November 2025 12:21 PM
To: irma@environmentcen.co.za

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irma@environmentcen.co.za

From: Michaele Collins <Michaele.Collins@westerncape.gov.za>
Sent: 05 December 2025 11:48 AM
To: irma@environmentcen.co.za
Cc: Etienne A Roux; Cindy Ganten-Bein; Toesie, Rene
Subject: Pre - Application Draft Scoping Report (DSR) for the proposed Bulk Mineral Ore Terminal (Storage and Handling Facility) on Farm Re/1139, Saldanha Bay
Attachments: 01_Comment_DSR_Ore storage and Handling facility on farm RE1139, Saldanha Bay.pdf
Importance: High

Good Day Ms Van der Merwe,

Kindly find attached comments for your attention

Please confirm receipt of this email

Regards

Michaele Collins

Personal Assistant to Dr Joy Leaner

Directorate: Air Quality Management

Department of Environmental Affairs and Development Planning

Western Cape Government

1st Floor, Property Centre, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 2888

Email: Michaele.Collins@westerncape.gov.za

Website: www.westerncape.gov.za/eadp



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This serves as a notification to all identified Interested and Affected Parties / organs of state that the pre-application Draft Scoping Report for the above is available for a 30 day public and state department / organs of state review and comment period.

The 30 day review period will be from 31 October 2025 until 1 December 2025.

Attached is the Executive Summary of the pre-application Draft Scoping Report, Screening Tool Report.

A full copy of the report is available on CEN IEM Unit's website:

<https://environmentcen.co.za/project-items/bulk-mineral-ore-storage-terminal-saldanha/>

Please submit any written comments and / or concerns by 1 December 2025 to:

CEN Integrated Environmental Management Unit

Mrs I van der Merwe

irma@environmentcen.co.za

We look forward to your participation.

Please note if you do not want to be included in the I&AP database, please advise us in order for your details to be removed. Otherwise it is deemed that you consent for your details to be included, in terms of the Protection of Personal Information Act (No. 4 of 2013).

Kind regards
Irma van der Merwe



Irma Van Der Merwe
Environmental Scientist

Address: 36 River Road, Walmer, Port Elizabeth, 6070, South Africa
Tel: +27 (0)41 581 2983
Fax: 086 504 2549
Cell: +27 (0)83 238 5911
Email: irma@environmentcen.co.za

Working to conserve South Africa's dwindling natural resources.

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irma@environmentcen.co.za

From: Ismat Adams <iadams@capenature.co.za>
Sent: 02 December 2025 12:19 PM
To: irma@environmentcen.co.za
Cc: Marius Wheeler
Subject: RE: Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay
Attachments: RE-1139_saldanha_02122025.pdf

Good day

See attached comment

Kind regards,

Ismat Adams
Land-Use Scientist | Landscape West
Conservation Operations
t: 087 087 3188



From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: Friday, 31 October 2025 15:03
To: Marius Wheeler <mwheeler@capenature.co.za>; Ismat Adams <iadams@capenature.co.za>
Cc: 'Mike Cohen' <steenbok@aerosat.co.za>
Subject: Availability of the Pre-application Scoping Report for the Proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

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Dear Interested and Affected Party / Organ of State

Notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay.

The applicant, Newfields Investments, intends to apply for Environmental Authorisation for activities listed in the EIA Regulations, 2014 as amended promulgated in terms of the National Environmental Management Act, 1998.

The applicant will also apply for an Atmospheric Emissions Licence in terms of the National Environmental Management: Air Quality Act, 2004.

irma@environmentcen.co.za

From: OUF Admin <admin@ouf.co.za>
Sent: 01 December 2025 05:13 PM
To: irma@environmentcen.co.za
Cc: Wimpie Pienaar; Rilette Avenant-Buys; Ricus van Heerden; Vernon Samuels; Henk Bester
Subject: OUF comments on the pre-application draft scoping report – Proposed manganese storage and handling facility, Saldanha
Attachments: 202511_OUF comments on Pre-Scoping draft report.pdf

Good day,

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.

Kind Regards,
OUF (Pty) Ltd



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irma@environmentcen.co.za

From: irma@environmentcen.co.za
Sent: 01 December 2025 04:53 PM
To: 'Etienne A Roux'
Subject: RE: Comment on the Pre-application SR for the Proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

Good afternoon Etienne
Please note that the PPP has been extended until 8 December 2025.
I trust you will find this in order.
Thank you
Kind regards
Irma van der Merwe

From: Etienne A Roux <Etienne.Roux@westerncape.gov.za>
Sent: 01 December 2025 02:14 PM
To: irma@environmentcen.co.za
Subject: Comment on the Pre-application SR for the Proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

Good day Irma

I hope this email finds you well.

Is there any chance you can grant us extension until Friday to submit comments to you on the above mentioned application.

Please let me know if you can accommodate this request.

Regards,

Etienne Roux *Reg. EAP (EAPASA_2021/4080)*
Control Environmental Officer: Air Quality Regulatory Services
Directorate: Air Quality Management
Department: Environmental Affairs and Development Planning

1st floor Property Centre, 3 Dorp Street, Cape Town, 8001

Tel: 021 483 8378
Fax: 021 483 4425
E-mail: Etienne.Roux@westerncape.gov.za
Website: www.westerncape.gov.za/eadp

Register to vaccinate: vaccine.enroll.health.gov.za/#/
or send the word 'REGISTER' to 0600 123 456 to WhatsApp or dial *134*832#

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.

3.3. 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, 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.

3.4. 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 of the broader environmental assessment process.

4. Conclusion

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.

Regards,
OUF (Pty) Ltd

- Capacity, reliability, or safety of rail and port operations;
- Allocation or reallocation of rail and port 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.

3. OUF comments on the pre-application Scoping Report

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:

3.1. 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 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.

3.2. 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, Tiplers 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 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,

Date: 30 November 2025

Attention: Dr M Cohen, Ms L Behrens and Ms I van der Merwe
CEN Integrated Environmental Management Unit
140 Kruger Gardens
62 Admiralty Way
Summerstrand
Gqeberha
6001

By email: irma@environmentcen.co.za

Dear Dr Cohen, Ms L Behrens and Ms van der Merwe,

OUF COMMENTS ON THE PRE-APPLICATION DRAFT SCOPING REPORT – PROPOSED MANGANESE STORAGE FACILITY, SALDANHA

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 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.

Set out below are our contract details for purposes of registering the OUF as an I&AP:

- **Representative of OUF (Pty) Ltd:** Henk Bester
- **Email address:** henk.bester@ouf.co.za and admin@ouf.co.za
- **Postal address:** Suite 10, First floor, 114 West St, Katherine & West, Sandton, 2191, Johannesburg, South Africa
- **Project Reference:** Pre-application draft Scoping Report – proposed Manganese Storage Facility, Saldanha

1. Introduction

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).

2. OUF interest and status as an interested and affected party (I&AP)

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:

Attached is the pre-application Draft Scoping Report, Screening Tool Report as well as the Site Sensitivity Verification Report.

A full copy of the report is available on CEN IEM Unit's website:

<https://environmentcen.co.za/project-items/bulk-mineral-ore-storage-terminal-saldanha/>

I trust you will find this in order.

Thank you

Kind regards

Irma van der Merwe



Irma Van Der Merwe
Environmental Scientist

Address: 36 River Road, Walmer, Port Elizabeth, 6070, South Africa
Tel: +27 (0)41 581 2983
Fax: 086 504 2549
Cell: +27 (0)83 238 5911
Email: irma@environmentcen.co.za

Working to conserve South Africa's dwindling natural resources.

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Irma Van der Merwe

From: Themba Silinda <Themba.Silinda@westerncape.gov.za>
Sent: 02 December 2025 10:12 AM
To: irma@environmentcen.co.za
Cc: Taryn Dreyer
Subject: RE: 16/3/3/6/7/2/F4/17/3147/2 - Newfields Pre-Applicatoin Scoping Report

Dear Irma

I hope you are well.

We are currently experiencing a high volume of cases, thus we could not provide our comments yesterday, we request an extension until Friday, 05 December 2025, 16:00.

Please let me know if this works for you.

Kind regards,

Themba Silinda
EAPASA Registration (2019/769)
Environmental Officer (EO)
Department of Environmental Affairs and Development Planning
Western Cape Government
7th Floor, Utilitas Building, 1 Dorp Street, Cape Town, 8000

Tel: +27 (0)21 483 8367
Email: Themba.Silinda@westerncape.gov.za
Website: www.westerncape.gov.za/eadp



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From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: Friday, October 31, 2025 10:38 AM
To: Themba Silinda <Themba.Silinda@westerncape.gov.za>; Taryn Dreyer <Taryn.Dreyer@westerncape.gov.za>
Cc: 'Mike Cohen' <steenbok@aerosat.co.za>; lucille@environmentcen.co.za
Subject: 16/3/3/6/7/2/F4/17/3147/2 - Newfields Pre-Applicatoin Scoping Report

Good morning Themba and Taryn

Please find attached the pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay.

This serves as a notification to all identified Interested and Affected Parties / organs of state that the pre-application Draft Scoping Report for the above is available for a 30 day public and state department / organs of state review and comment period.

The 30 day review period will be from **31 October 2025 until 1 December 2025**.

6. 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 off-takers/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.

Yours sincerely,

Manganese Producers Consortium (Pty) Ltd.

- 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.
- 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.

5. 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.
- **Tipler 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.
- **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.

2. About the Manganese Producers Consortium

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 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.

3. 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.

4. 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:

30 November 2025

Attention: Dr M Cohen / Ms L Behrens / Ms I Van der Merwe

CEN Integrated Environmental Management Unit
140 Kruger Gardens
62 Admiralty Way
Summerstrand
Gqeberha
6001

Email: irma@environmentcen.co.za

Dear Dr Cohen, Ms Behrens and Ms Van der Merwe,

COMMENTS ON PRE-APPLICATION SCOPING REPORT: PROPOSED DEVELOPMENT AND OPERATION OF A BULK MINERAL ORE STORAGE TERMINAL AND CONVEYORS IN SALDANHA

1. Introduction and request for registration as an I&AP

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: 1st Floor, Katherine & West Building, 114 West Street, Sandown, Sandton 2191.
- Project Reference: Pre-application draft Scoping Report – proposed development and operation of a bulk mineral ore storage terminal and conveyors, Saldanha.



GAVIN VENTER
Manager Saldanha & Strategic Projects
Phone: +27 11 670 5560
Mobile: +27 83 309 4246
gavin.venter@za.afrisam.com



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irma@environmentcen.co.za

From: irma@environmentcen.co.za
Sent: 20 November 2025 09:32 AM
To: 'Gavin Venter'; 'steenbok@aerosat.co.za'; 'companysecretary@za.afrisam.com'
Cc: 'Quentin Dollman'; 'Vishal Aniruth'
Subject: RE: Registration as I&AP for proposed Newfield development on Farm 1139 - Saldanha

Good morning Gavin

I trust you are well.

As the current landowners of the site, you are automatically included as an I&AP.

An email notification was sent to Hardie, however, in future all correspondence regarding the application will be directed to yourself and companysecretary@za.afrisam.com.

Kindly submit any written comment and/or concern to myself.

We look forward to your participation in the process.

Kind regards

Irma van der Merwe

From: Gavin Venter <gavin.venter@za.afrisam.com>
Sent: 19 November 2025 05:38 PM
To: irma@environmentcen.co.za; steenbok@aerosat.co.za
Cc: Quentin Dollman <quentin.dollman@za.afrisam.com>; Vishal Aniruth <vishal.aniruth@za.afrisam.com>
Subject: Registration as I&AP for proposed Newfield development on Farm 1139 - Saldanha



Irma, Hi

If not already on the list, please register AfriSam as an I&AP.

We are obviously the current existing owners of Farm 1139 and future neighbouring landowners if the development goes ahead.

For continuity, please address all correspondence to both myself as well as Companysecretary@za.afrisam.com

Regards

Gavin

May I please be registered as an interested and affected party for the application and be provided with all the information generated through the process?

My interest in the project is as a member of public that has an interest in the environmental impacts (air quality in particular) in a very sensitive area.

Please note my details as follows:

Name: Magnus van Rooyen

Email: magnus@ecolinksa.co.za

All the best,

Magnus

Good morning

Neighbours, organs of state, the Saldanha Bay Municipality, West Coast District Municipality, the competent authority and identified potential Interested and Affected Parties have been notified.

Newspaper adverts and site notices were used as well.

Thank you

Kind regards

Irma van der Merwe



From: magnus@ecolinksa.co.za <magnus@ecolinksa.co.za>

Sent: 05 November 2025 06:08 PM

To: irma@environmentcen.co.za

Subject: RE: Newfields Investments Application for Environmental Authorisation

Good evening Irma,

Many thanks for the confirmation.

Who is the Pre-application Scoping Report being circulated to?

All the best,

Magnus

From: irma@environmentcen.co.za <irma@environmentcen.co.za>

Sent: Tuesday, 04 November 2025 08:20

To: magnus@ecolinksa.co.za

Subject: RE: Newfields Investments Application for Environmental Authorisation

Good morning Magnus

You have been registered as an Interested and Affected Party for the proposed Newfields Investments Application.

Please submit any written comments and/or concerns to myself by 1 December 2025.

All I&APs will be notified once the post-application Draft Scoping Report will be available for public participation.

Thank you for your participation.

Kind regards

Irma van der Merwe

From: magnus@ecolinksa.co.za <magnus@ecolinksa.co.za>

Sent: 04 November 2025 08:08 AM

To: irma@environmentcen.co.za

Subject: Newfields Investments Application for Environmental Authorisation

Hi Irma,

I saw the newspaper advert for the Newfields Investments Application for Environmental Authorisation.

Irma Van der Merwe

From: magnus@ecolinksa.co.za
Sent: 27 November 2025 06:17 PM
To: irma@environmentcen.co.za
Subject: RE: Newfields Investments Application for Environmental Authorisation

Good evening Irma,

I take note of my registration as an interested and affected party for the Newfields Investments Application. I also look forward to receive the Draft Scoping Report as indicated in your email below.

Please find below my preliminary comments as it relates to the very limited information contained in the Newspaper:

1. I note that the advert makes provision for the availability of the Pre-application Environmental Report from 31 October 2025 to 30 November 2025. I note that this report was not made available to me during my registration as an Interested and Affected Party, but was informed that this document was only made available to the following entities only:
 - Neighbours,
 - Organs of State,
 - The Saldanha Bay Municipality,
 - West Cost District Municipality,
 - The Competent Authority, and
 - Identified potential Interested and Affected Parties

This being the case, why was 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 be 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.

2. Can I please be provided with a layout plan for the facility as well as the transport routes as quoted in the newspaper advert?
3. Can clarity please be provided as to what mineral will be handled by the facility?
4. Can copies of the Application for Environmental Authorisation as well as the Air Emissions Licence Application Form be provided to me?

All the best,

Magnus

From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: Thursday, 06 November 2025 08:07
To: magnus@ecolinksa.co.za
Subject: RE: Newfields Investments Application for Environmental Authorisation

To view AfriSam's legal disclaimer, please go to <https://www.afrisam.co.za/legal/>

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irma@environmentcen.co.za

From: Gavin Venter <gavin.venter@za.afrisam.com>
Sent: 19 November 2025 05:38 PM
To: irma@environmentcen.co.za; steenbok@aerosat.co.za
Cc: Quentin Dollman; Vishal Aniruth
Subject: Registration as I&AP for proposed Newfield development on Farm 1139 - Saldanha



Irma, Hi

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We are obviously the current existing owners of Farm 1139 and future neighbouring landowners if the development goes ahead.

For continuity, please address all correspondence to both myself as well as Companysecretary@za.afrisam.com

Regards

Gavin

AfriSam
Creating Concrete Possibilities

GAVIN VENTER
Manager Saldanha & Strategic Projects
Phone: +27 11 670 5560
Mobile: +27 83 309 4246
gavin.venter@za.afrisam.com



irma@environmentcen.co.za

From: Cindy Ganten-Bein <cgbein@wcdm.co.za>
Sent: 12 November 2025 02:15 PM
To: irma@environmentcen.co.za
Cc: Celeste J. Minnaar; Surene J. Grootboom; WCDM Correspondence
Subject: Comments Re Newfield Proposed Development Pre-Application Scoping Report
Attachments: WCDM Comment Re Newfields Pre-application Draft Scoping Report.pdf

Good day CEN Integrated Environmental Management Unit

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.

You are welcome to contact this office if you have any concerns or queries.

Regards

C. Ganten-Bein

Manager: Air Quality

West Coast District Municipality

Tel: 022 495 0744

Switchboard: 022 433 8400

Email: cgbein@wcdm.co.za



**WESKUS DISTRIKSMUNISIPALITEIT
WEST COAST DISTRICT MUNICIPALITY**

Rig alle korrespondensie aan:
Address all correspondence to:

**MUNISIPALE BESTUURDER/
MUNICIPAL MANAGER**

Navrae / Enquiries: C.Ganten-Bein
Verw Nr / Ref No: 15/5/3/2/1



Posbus / P O Box 242
MOORREESBURG, 7310

Telefoon/Phone (022) 433 8400
Faks/Fax Nr. 086 6926 113

E-Mail Adres/Address:
westcoastdm@wcdm.co.za

12 November 2025

Dr M Cohen / Ms L Behrens / Ms I van der Merwe
CEN Integrated Environmental Management Unit

Via email: irma@environmentcen.co.za

Dear Dr M Cohen / Ms L Behrens / Ms I van der Merwe

**COMMENTS RE: PROPOSED NEWFIELDS BULK MINERAL ORE STORAGE
TERMINAL SALDANHA BAY: PRE-APPLICATION DRAFT SCOPING REPORT
WITH DEADP NOI REFERENCE: 16/3/3/6/7/2/F4/17/3147/25.**

The notification of the availability of the Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay, has reference and this office has the following comment:

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: cgbein@wcdm.co.za and cjminnaar@wcdm.co.za

As per section 22 of the NEM: AQA, no person may conduct a listed activity without an atmospheric emission licence. Consequences as per Section 22A of the NEM: AQA will be applied if such unlawful activity takes place.

2. The applicant must submit to this office the granted environmental authorisation.
3. 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

1 of 2

- Socio-economic Impact Assessment
- Traffic Impact Assessment
- Noise impact assessment
- Visual Impact Assessment

4. 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.

5. The applicant states that Tippler 3 located on Transnet Port Terminals site will be utilised for offloading of manganese. It is important to note that in order for this to occur, Transnet may be required to apply for an amended AEL prior to the use of Tippler 3.
6. The applicant must submit to this office the exact description of what dust mitigation measures will be utilised to prevent fugitive dust escaping into the receiving environment from operations and its equipment, how the dust from the extraction systems will be retrieved and transferred back into the silos, how will maintenance be conducted on the conveyor belts and silos without allowing fugitive dust escaping into the receiving environment.
7. The applicant must submit to this office a Standard Operating Procedure of how any spillages from operations will be contained and fed back into the silos.
8. It will be required of the applicant to provide to this office the contact details of the emissions control officer available during the construction phase.
9. During the construction phase, it is vital that dust mitigation measures are applied at all times to prevent fugitive dust escaping into the receiving environment and negatively impacting on nearby residents and land users.

This office looks forward to receiving the requested documentation, to further make informed decisions.

Yours Faithfully



.....
C. GANTEN-BEIN
MANAGER: AIR QUALITY

Magnus

Irma Van der Merwe

From: magnus@ecolinksa.co.za
Sent: 05 November 2025 06:08 PM
To: irma@environmentcen.co.za
Subject: RE: Newfields Investments Application for Environmental Authorisation

Good evening Irma,

Many thanks for the confirmation.

Who is the Pre-application Scoping Report being circulated to?

All the best,

Magnus

From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: Tuesday, 04 November 2025 08:20
To: magnus@ecolinksa.co.za
Subject: RE: Newfields Investments Application for Environmental Authorisation

Good morning Magnus

You have been registered as an Interested and Affected Party for the proposed Newfields Investments Application. Please submit any written comments and/or concerns to myself by 1 December 2025.

All I&APs will be notified once the post-application Draft Scoping Report will be available for public participation.

Thank you for your participation.

Kind regards

Irma van der Merwe

From: magnus@ecolinksa.co.za <magnus@ecolinksa.co.za>
Sent: 04 November 2025 08:08 AM
To: irma@environmentcen.co.za
Subject: Newfields Investments Application for Environmental Authorisation

Hi Irma,

I saw the newspaper advert for the Newfields Investments Application for Environmental Authorisation.

May I please be registered as an interested and affected party for the application and be provided with all the information generated through the process?

My interest in the project is as a member of public that has an interest in the environmental impacts (air quality in particular) in a very sensitive area.

Please note my details as follows:

Name: Magnus van Rooyen
Email: magnus@ecolinksa.co.za

All the best,

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.

We are open to meet.

Irma Van der Merwe

From: CEO - Red Dust Action Group <ceo@rdag.org.za>
Sent: 17 November 2025 03:21 PM
To: irma@environmentcen.co.za
Cc: Compliance; Mark West; Adam Scholtz RDAG Research Portfolio; Secretary; Cindy Ganten-Bein; Celeste J. Minnaar; andre.anthony.dart@gmail.com; Pieter Gouws RDAG Membership Portfolio; lindy@sun.ac.za; Jean Tredoux; Lance Coetzee; John Selby; Ward5
Subject: Registration as I&A parties
Attachments: Executive Summary Pre-application Scoping Report Saldanha Ore Facility.PDF; Untitled attachment 00019.htm; attachment.jpeg; Untitled attachment 00022.htm

Good Mrs I van der Merwe,

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?

We also ask that you please register the following individuals of our organisation with effect.

- **Mark West** – compensation@rdag.org.za
- **Hein Witte** – secretary@rdag.org.za
- **Adam Scholtz** – research@rdag.org.za
- **Brian Blackbeard** – compliance@rdag.org.za
- **Kyle Dods** – ceo@rdag.org.za

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 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.

Irma Van der Merwe

From: Jerome vraagom <jeromevandsons@gmail.com>
Sent: 31 October 2025 04:06 PM
To: irma@environmentcen.co.za
Subject: Re: PRE APPLICATION NOTICE OF PUBLIC PARTICIPATION FARM RE/1139, SALDANHA BAY

Hi Irma

Thank you. I managed to download the documents earlier. Coming from the Iron Ore Terminal is Saldanha, the operational process looks good. Hopefully in the future I can assist them when it comes to 5 km of conveyor belt lol.

Have a blessed weekend.

CFG greetings,

*Jerome Vraagom (Marine & Cargo Surveyor)
Managing Director
V and Sons Pty Ltd
+27833640966*

On Fri, Oct 31, 2025 at 3:27 PM <irma@environmentcen.co.za> wrote:

Good afternoon Jerome

I trust you are well.

Kindly note that you have been registered as an Interested and Affected Party for the proposed bulk storage terminal on Farm RE/1339, Saldanha.

The pre-application scoping report is now available on our website:

<https://environmentcen.co.za/project-items/bulk-mineral-ore-storage-terminal-saldanha/>

If you have difficulty retrieving the documents, please let me know.

Please submit written comments and/or concerns to myself by 1 December 2025.

I look forward to your participation in the process.

Kind regards

Irma van der Merwe

From: Jerome vraagom <jeromevandsons@gmail.com>
Sent: 30 October 2025 05:13 PM
To: irma@environmentcen.co.za
Subject: Re: PRE APPLICATION NOTICE OF PUBLIC PARTICIPATION FARM RE/1139, SALDANHA BAY

Hi Irma

Thank you for reverting, yes I will appreciate the registration.

Best regards

Jerome Vraagom (Marine & Cargo Surveyor)

Managing Director

V and Sons Pty Ltd

+27833640966

On Thu, Oct 30, 2025 at 5:00 PM <irma@environmentcen.co.za> wrote:

Good afternoon Jerome

Thank you for your email.

The pre-application Scoping Report will be released for public participation tomorrow and the comment and review period will run from 31 October until 1 December 2025.

The pre-application Scoping Report will be published on the website during the course of the day.

I will share a copy with you tomorrow.

Would you like me to register yourself as an Interested and Affected Party?

Thank you

Kind regards

Irma van der Merwe



Working to conserve South Africa's dwindling natural resources.

Irma Van Der Merwe
Environmental Scientist

Address: 36 River Road, Walmer, Port Elizabeth, 6070, South Africa
Tel: +27 (0)41 581 2983
Fax: 086 504 2549
Cell: +27 (0)83 238 5911
Email: irma@environmentcen.co.za

From: Jerome vraagom <jeromevandsons@gmail.com>

Sent: 30 October 2025 04:43 PM

To: irma@environmentcen.co.za

Subject: PRE APPLICATION NOTICE OF PUBLIC PARTICIPATION FARM RE/1139, SALDANHA BAY

Dear Irma

Trust that this email finds you well.

I struggle to find the pre-application Scoping report on your website "www.environmentcen.co.za/"

Can you perhaps forward it to me?

Best regards,

Jerome Vraagom (Marine & Cargo Surveyor)

Managing Director

V and Sons Pty Ltd

+27833640966



Working to conserve South Africa's dwindling natural resources.

Irma Van Der Merwe
Environmental Scientist

Address: 36 River Road, Walmer, Port Elizabeth, 6070, South Africa
Tel: +27 (0)41 581 2983
Fax: 086 504 2549
Cell: +27 (0)83 238 5911
Email: irma@environmentcen.co.za

From: Christo <metsal@imagnet.co.za>
Sent: 10 November 2025 01:39 PM
To: irma@environmentcen.co.za
Cc: jb@sun.ac.za; 'Elmien de Bruyn' <Elmien.deBruyn@DUFERCO.CO.ZA>; Christo van Wyk <metsal@imagnet.co.za>
Subject: Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, 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 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.

Groete / Regards

Christo van Wyk

The Saldanha Bay Water Quality Forum Trust

Telephone: (022) 709 7153

Cell: 082- 376 8529

E-mail: manager@swqt.org.za

Website: swqt.org.za



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Irma Van der Merwe

From: Elmien De Bruyn <Elmien.deBruyn@DUFERCO.CO.ZA>
Sent: 11 November 2025 11:45 AM
To: irma@environmentcen.co.za; 'Christo'
Cc: jb@sun.ac.za
Subject: RE: Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

Good day Irma

You can add me as an IAP.

Regards

ELMIEN DE BRUYN

Environmental Co-Ordinator



Tel: +27 22 709 7127

Cell: +27 83 308 5938

Fax: +27 87 238 6685

From: irma@environmentcen.co.za <irma@environmentcen.co.za>
Sent: Monday, 10 November 2025 14:15
To: 'Christo' <metsal@imagnet.co.za>
Cc: jb@sun.ac.za; Elmien De Bruyn <Elmien.deBruyn@DUFERCO.CO.ZA>
Subject: RE: Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

Good afternoon Christo

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 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.

Thank you

Kind regards

Irma van der Merwe

Irma Van der Merwe

From: DEADP EIA Admin <DEADPEIAadmin@westerncape.gov.za>
Sent: 10 November 2025 11:20 AM
To: kirushag@newlyngroup.com
Cc: Duarte, Nazeema; lucille@environmentcen.co.za; irma@environmentcen.co.za; hardie.debeer@za.afrisam.com
Subject: Re: Ack Pre-App Draft Scoping Report_Bulk Mineral Ore Terminal_Rem Farm 1139 Saldanha Bay_3147/25
Attachments: 2025_11_10_To NewfieldsInvestments_Bulk Mineral Ore Terminal_Rem Farm 1139 Saldanha Bay_Ack Pre-AppSR_3147-25.pdf

Dear Mr. Rajendra Balmakhun,

Attached please find the correspondence from this Directorate concerning the Remainder of Farm 1139, Saldanha Bay.

Vriendelike Groete / Kind Regards / Ngomkhulu Umbuliso,

DEADP EIA ADMIN

Department of Environmental Affairs and Development Planning
Western Cape Government
Website: www.westerncape.gov.za/eadp



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Should you not be able to contact the numbers above, please call +27 (0)21 483 4091 between 07:30 - 16:00.

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If you are not the intended recipient you may not copy or deliver this message to anyone."

irma@environmentcen.co.za

From: Christo <metsal@imaginet.co.za>
Sent: 10 November 2025 01:39 PM
To: irma@environmentcen.co.za
Cc: jb@sun.ac.za; 'Elmien de Bruyn'; Christo van Wyk
Subject: Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

Pre-application Draft Scoping Report for the proposed Newfields Bulk Mineral Ore Storage Terminal, Saldanha Bay

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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.

Groete / Regards

Christo van Wyk

The Saldanha Bay Water Quality Forum Trust

Telephone: (022) 709 7153

Cell: 082- 376 8529

E-mail: manager@swqt.org.za

Website: swqt.org.za



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Appendix 5: I&AP Database

Table 0-1: I&AP Database

Name	Organisation / Role	City / Town	Registration date / Date received	Contact Details	Email
Project Applicant					
Newfields Investments Shaun Ramdhari Kirusha Govender	Project manager / Environmental Officer	KZN	Automatically registered		
Landowners					
AfriSam	Hardie De Beer	WC	Automatically registered		
Adjacent landowners					
Transnet Farm Nr: (1/1139; 3/127; 5/129; 16/197; 17/127; 1195)					
Farm Nr:RE/1132					
Farm Nr:RE/2/129					
Name: YZERVARKENSRUG Farm Nr:69/127	Avedia Energy (develop LPG with Transnet)		Automatically registered		
Name: PIENAARS POORT Farm Nr:8/197	Transnet Port terminal tipplers				
Farm Nr:1185	TPT	CCR	Automatically		

Name	Organisation / Role	City / Town	Registration date / Date received	Contact Details	Email
	Shipwright Service Transnet Port Terminal		registered		
Name: YZERVARKENSRUG Farm Nr:70/127					
Farm Nr:3/1112 & Nr:RE/1112					
14722	Pindulo VDM				
11690					
11675					
11676					
11677	Antcor Pty Ltd				
11678					
11680					
11682					
11683	West Arcor				
11684					
11685					
11688	Duferco				
11689					
11690					
Name: YZERVARKENSRUG Farm Nr:49/127	Vaalmac Saldanha Pty Ltd Saldanha Industrial Dev. Zone				
Name: YZERVARKENSRUG Farm Nr:53/127	SPH Kundalila				
Organisation	Name	City / Town	Registration date / Date received	Contact Details	Email
ORGANS OF STATE					
DEADP	Zaahir Toefy				

Name	Organisation / Role	City / Town	Registration date / Date received	comment	Contact Details	Email
DEADP	Herman Jonker					
DEADP	Chrizelle Kriel – Saldanha strategic offset policy					
DEADP: Pollution & Chemicals Management	Ms. Wilna Kloppers					
DEADP: Waste Management	Mr. Saliem Haider Mr. Lance McBain-Charles					
Department of Agriculture, Western Cape						
Heritage Western Cape (HWC)	CEO Heritage Western Cape					
HWC	Emily Vowles					
Department of Water and Sanitation	Mrs. Nelissa Nbobeni Mr. Warren Dreyer					
Department of Health	Mr Stanley Nomdo					
DEA&DP Air Quality Management	Dr Joy Leaner					
Department: Transport and Head public works						

Name	Organisation / Role	City / Town	Registration date / Date received	comment	Contact Details	Email
Department Public Works	Brian Stander					
CapeNature	Mr. Marius Wheeler Ismat Adams					
Transnet						
Transnet	Raymond van Rooyen					
Transnet	Marlon Saayman					
Transnet	Adele Groenewald					
Eskom						
Saldanha Bay IDZ						
West Coast District Municipality	Municipal Manager, Mayor					
West Coast District Municipality	Cindy Ganten-B ein					
West Coast District Municipality: Air Quality	CJ Minnaar					
Saldanha Bay Municipality						
Saldanha Bay Municipality	Nazeema Duarte					
Saldanha Bay Municipality	Heinrich Mettler					
Saldanha Bay Municipality	General					
Saldanha Bay Municipality	Municipal manager					
Ward 5	Cllr Charmaine Laubscher					
Saldanha Bay Municipality	André Lewaks					
Chumisa Njingana / Nanna Gouws SOUTH AFRICAN NATIONAL ROADS AGENCY S O C LTD (SANRAL)	SANRAL Statutory Control Administrator	PE				

Name	Organisation / Role	City / Town	Registration date / Date received	comment	Contact Details	Email
National Department of Transport & Public Works – Brian Stander	National Department of Transport & Public Works – Brian Stander	Automatically registered				
The Saldanha Bay Water Quality Forum Trust (SBWQFT)	Phone: 022 714-3367					
Aikonese Cochoqua Khoi Tribal Council	Paramount Chief K Maart					
Sanparks						
Weskus Sakekamer						
Registered IAPS						
V and Sons Pty Ltd	Jerome Vraagom					
Ecolink	Magnus van Rooyen					
Duferco Steel Processing	ELMIEN DE BRUYN		10/11/2025			
The Saldanha Bay Water Quality Forum Trust	Christo Van Wyk		10/11/2025			
			17/11/2025			
Red Dust Action Group	Brian Blackbeard		17/11/2025			
Red Dust Action Group	Mark West		17/11/2025			
RDAG Membership Portfolio	Pieter Gouws		17/11/2025			
	Lindy		17/11/2025			
Red Dust Action Group	Jean Tredoux		17/11/2025			
Red Dust Action Group	Lance Coetzee		17/11/2025			
Red Dust Action Group	John Selby		17/11/2025			
Red Dust Action Group	Andre Anthony		17/11/2025			
Red Dust Action Group	Kyle Dodds		17/11/2025			
	Adam Scholtz		17/11/2025			
	Hein Witte		17/11/2025			
OUF	Rilette Avenant-Buys		01/12/2025			
OUF	Wimpie Pienaar		01/12/2025			
OUF	Ricus van Heerden		01/12/2025			
OUF	Vernon Samuels		01/12/2025			

Name	Organisation / Role	City / Town	Registration date / Date received comment	Contact Details	Email
OUF	Henk Bester		01/12/2025		
OUF	OUF Admin		01/12/2025		
MPC	Hugo Tallie		01/12/2025		
Manganese Producers Consortium (Pty) Ltd. Board	Henk Bester		30/11/2025		