



ArcelorMittal South Africa (PTY) Ltd

LOGISTIC HUB BASIC ASSESSMENT

Stakeholder Engagement Report





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LIST OF ABBREVIATIONS

Abbreviations	Description
AEL	Atmospheric Emissions Licence
BA	Basic Assessment
BAR	Basic Assessment Report
BFRF 2020	South African Biofuels Regulatory Framework Of 2020
BSP	Biodiversity Spatial Plan

Abbreviations	Description
CA	Competent Authority
CBA	Critical Biodiversity Area
CR	Critically Endangered
CRR	Comments and Response Report
CV	Curriculum vitae
DEA&DP	Department of Environmental Affairs and Development Planning
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMPr:	Environmental Management Programme
ESA	Ecological Support Area
GN	Government Notice
GN R.	Government Notice Regulation
HWC:	Heritage Western Cape
I&AP	Interested And Affected Party
NAAQS	National Ambient Air Quality Standards
NEMA	National Environmental Management Act (No. 107 of 1998), as amended
NEMAQA	National Environment Management Air Quality Act (No. 39 of 2004)
NEMBA	National Environmental Management Biodiversity Act (Act 10 of 2004)
NEMPAA	National Environmental Management Protected Areas Act (Act 57 of 2003)
NEMWA	National Environmental Management Waste Act (Act 59 of 2008)
NFEPA:	National Freshwater Ecosystem Protection Assessment

Abbreviations	Description
NHRA	National Heritage Resources Act, Act 25 of 1999
NID	Notice of Intent to Develop
NSBA:	National Spatial Biodiversity Assessment
NWA	National Water Act (Act 36 of 1998)
OHSA	Occupational Health and Safety Act (Act 85 of 1993)
PM ₁₀	Particles with a diameter of 10 micrometres or less
PM _{2.5}	Particles with a diameter of 2.5 micrometres or less
PPE	Personal Protective Equipment
PPP	Public Participation Process
PSDF	Provincial Spatial Development Framework
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
SANBI	South African National Biodiversity Institute
SDF	Spatial Development Framework
SEA	Strategic Environmental Assessment
SER	Stakeholder Engagement Report
TOR:	Terms of Reference
WCBSP:	Western Cape Biodiversity Spatial Plan
WCG:	Western Cape Government
WSP	WSP Group Africa (Pty) Ltd

conveyance systems and transfer stations. The proposed operation at the Logistic Hub entails the receiving, handling, and distributing of various bulk commodities for local and export purposes. The proposed Hub aims to handle a maximum of 5 million tonnes of various bulk commodities per annum. Commodities to be handled at the Logistics Hub includes Manganese Ore, Phosphate Concentrate, Garnet sand, Zircon sand, Lead Concentrate, Copper concentrate and Zinc Concentrate. The Hub will operate independently of Saldanha Steel Works itself.

Given the fit-for-purpose rail and raw materials handling infrastructure already available on site, it is envisaged that the operation will serve to debottleneck the Port of Saldanha and increase the productivity and efficiency of export operations at the Transnet National Ports Authority (TNPA) Multi-Purpose Terminal in Saldanha.

The Hub shall operate independently of the operations of Saldanha Works itself, such that re-commissioning of Saldanha Works is not impeded. To develop the proposed Logistics Hub, AMSA is required to apply for an Environmental Authorisation (EA) by undertaking a Basic Assessment (BA) process. The BA Report (BAR) that is drafted in the process was supported by an Air Quality Impact Assessment, Human Health Risk Assessment, Heritage Impact Assessment, Economic Impact Assessment, Social Impact Assessment, Traffic Impact Assessment, Aquatic Compliance Statement, Terrestrial Biodiversity Compliance Statement, as well as an amendment of its current Atmospheric Emissions Licence (AEL)

Thus, AMSA has appointed WSP Group Africa (Pty) Ltd (WSP), as the independent Environmental Assessment Practitioner (EAP), to undertake the environmental permitting processes for the proposed project.

This Stakeholder Engagement Report (SER) provides an overview of the public participation activities conducted during the BA process. These public participation activities were aimed at engaging with the stakeholders and gathering valuable input to inform the assessment. The subsequent chapters provide the specifics of these activities and their outcomes.

1.2 PUBLIC PARTICIPATION PROCESS

1.2.1 PURPOSE

Public participation is understood to be a series of inclusive and culturally appropriate interactions aimed at providing stakeholders with opportunities to express their views so that these can be considered and incorporated into the decision-making process. Effective public participation requires the prior disclosure of relevant and adequate project information to enable stakeholders to understand the risks, impacts, and opportunities of the proposed Project.

Basic reasons why the public is involved in the EA process include the following:

- The environment is held in public trust; therefore, the use of environmental resources is everyone's concern.
- Public participation is a proper, fair conduct in public decision-making activities. Focus on vulnerable and disadvantaged persons and offer equitable participation due to historical issues.
- It is a way to ensure that projects meet citizens' needs and are suitable for the affected public.
- The project carries more legitimacy, and less hostility, if Interested and Affected Parties (I&APs) are able to influence the decision-making process.
- Finally, the final decision is informed when local knowledge and values are included and when expert knowledge is publicly examined.

1.2.2 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.

1.2.3 WHAT IS AN INTERESTED AND AFFECTED PARTY?

An interested and affected party (I&AP) is defined as any person, group of persons or organisations interested in or affected by an activity, and any organ of state that may have jurisdiction over any aspect of the activity.

The difference between an I&AP and a registered I&AP is as follows:

- An I&AP can be directly or indirectly impacted by a proposed activity.
- A registered I&AP is a person whose name has been placed on the register of registered I&APs. According to the PPP Guidance Document, 2017, only registered I&APs will be notified:
 - of the availability of reports and other written submissions made to the Competent Authority (CA) by the Applicant, and be entitled to comment on these reports and submissions; and
 - of the outcome of the application, the reasons for the decision, and that an appeal may be lodged against a decision.

For this report, registered I&APs will be referred to as stakeholders.

1.2.4 RIGHTS, ROLES, AND RESPONSIBILITIES OF THE STAKEHOLDER

In terms of Chapter 6, specifically Section 43(1) of the Environmental Impact Assessment (EIA) Regulations promulgated under the National Environmental Management Act (No. 107 of 1998) (NEMA) (as amended), stakeholders have the right to bring to the attention of the CA any issues that they believe may be of significance to the consideration of the application. Certain obligations, namely qualify the rights of stakeholders:

- Stakeholders must ensure that their comments are submitted within the timeframes that have been approved by the Department of Environmental Affairs and Development Planning (DEA&DP), or within any extension of a timeframe agreed by the Applicant, Environmental Assessment Practitioner (EAP) and/or CA.
- Disclose to the EAP any direct business, financial, personal, or other interest that they might have in the approval or refusal of the application.

The roles of stakeholders in a PPP usually include one or more of the following:

- Assisting in the identification and prioritisation of issues that need to be investigated.
- Making suggestions on alternatives and means of preventing, minimising, and managing negative impacts and enhancing benefits of the activities conducted.
- Assisting in or commenting on the development of mutually acceptable criteria for the evaluation of decision options.
- Contributing information on public needs, values, and expectations.
- Contributing local and traditional knowledge.
- Verifying that their issues have been considered.

In order to participate effectively, stakeholders should:

- Become involved in the process as early as possible.
- Register as a stakeholder.
- Advise the EAP of other stakeholders who should be consulted.
- Contribute towards the design of the PPP (including timeframes) to ensure that it is acceptable to all stakeholders.
- Follow the process once it has been concluded.
- Read the material provided and actively seek to understand the issues involved.
- Give timeous responses to correspondence.
- Be respectful and courteous towards other stakeholders.
- Refrain from making subjective, unfounded, or ill-informed statements.
- Recognise that the process is confined to issues that are directly relevant to the application.

1.2.5 APPROACH TO STAKEHOLDER ENGAGEMENT

The stakeholder engagement approach is based on the following principles:

- Undertake meaningful and timely participation with stakeholders.
- Focus on important issues during the process.
- Undertake due consideration of alternatives.
- Take accountability for the information used.
- Encourage co-regulation, shared responsibility, and a sense of ownership over the proposed Project lifecycle.
- Apply “due process” particularly with regard to the PPP as provided for in the EIA Regulations, 2014 (as amended), promulgated under NEMA.
- Consider the needs, interests, and values of stakeholders.

The public participation guideline in terms of the EIA Regulations, 2014 (as amended), tabulates the level of public participation required for various levels of anticipated project impacts.

2 PUBLIC PARTICIPATION TO DATE

2.1 PRE-APPLICATION PHASE STAKEHOLDER ENGAGEMENT

Tasks undertaken during the Pre-application Phase are detailed in the following Sections.

2.1.1 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. A copy of the stakeholder database is included in 0.

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.

Section 41 of the EIA Regulations, 2014 (as amended), states that written notices must be given to identified stakeholders as outlined in Table 2-1.

Table 2-1 - Stakeholder Table

NEMA REQUIREMENT	DISCUSSION
<i>(i) the owner or person in control of that land if the applicant is not the owner or person in control of the land</i>	The applicant is the landowner.
<i>(ii) the occupiers of the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken</i>	The applicant is the landowner and occupant.
<i>(iii) owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site where the activity is to be undertaken</i>	Owners and occupiers of land adjacent to the site were included in the I&AP database.
<i>(iv) the municipal councillor of the ward in which the site or alternative site is situated and any organisation of ratepayers that represent the community in the area</i>	The Ward Councillor from Ward 1 – 14 of Saldanha Local Municipality has been included in the stakeholder database.
<i>(v) the municipality which has jurisdiction in the area</i>	The Saldanha Local Municipality and West Coast District Municipality were included in the stakeholder database.
<i>(vi) any organ of state having jurisdiction in respect of any aspect of the activity</i>	The Department of Environmental Affairs and Development Planning (DEA&DP) has been consulted as the CA regarding the application.
<i>(vii) any other party as required by the competent authority.</i>	All tiers of government, namely, national, provincial, local government and parastatals have been included in the stakeholder database. Inclusive of:

NEMA REQUIREMENT	DISCUSSION
	<ul style="list-style-type: none"> DEA&DP Department of Water and Sanitation (DWS); Department of Forestry, Fisheries and the Environment (DFFE): Oceans and Coast DFFE: Air Quality Authorisations DFFE: Air Quality Management DFFE: Atmospheric Policy , Regulation and Planning DFFE: Aquatic Coastal Pollution Management Heritage Western Cape (HWC); Cape Nature Western Cape Government: Infrastructure DEA&DP: Waste Management DEA&DP: Pollution and Chemicals Management DEA&DP: Air Quality Management Transnet National Ports Authority (TNPA)

The stakeholders along with the date on which they registered and reference to comments received, where applicable, are included in **Table 3-1**. The stakeholder database has been updated throughout the BA process.

2.2 KEY STAKEHOLDER ENGAGEMENTS THROUGHOUT THE BASIC ASSESSMENT PROCESS

The table below provides information regarding key stakeholder engagements conducted as part of the assessment process.

Table 2-2 – Stakeholder Engagements

Period	Stakeholder Engagement
Sept 2023	As part of the Heritage Impact Assessment , a focus group meeting and site visit with the Aikonese Cochoqua Khoi Tribal Council leadership was held on the Friday, 29 September 2023, from 09:30-12:30. The focus group meeting was conducted in the Saldanha Steel Works boardroom and followed by a site walk of the proposed area on which the warehouse will be constructed. This stakeholder engagement with the Aikonese Cochoqua Khoi Tribal Council Paramount Chief and leadership focussed on the requirements of Heritage Western Cape, to inform, educate and to provide the leadership of the Tribal Council with the opportunity to understand the proposed project, engage in dialogue and to visit the proposed project site for better insight. This component of the stakeholder engagement was conducted outside the formal statutory Environmental Authorisation process and to provide the Tribal Council leadership with the opportunity to provide detailed comments on the proposed project and provide input into the heritage impact assessment process. The information and comments received during this engagement with the Aikonese Cochoqua Khoi Tribal Council were included in the Heritage Impact Assessment report to be issued to HWC.
Nov 2023	As part of the Social Impact Assessment , focus group meetings were held on 12 November 2023 with identified stakeholders to inform, educate and provide the

	<p>organisations, businesses and individuals the opportunity to understand the proposed project and engage in dialogue to understand their concerns to the proposed project. Three focus group meetings were held and organisations and businesses were split into three categories below:</p> <ul style="list-style-type: none"> • Environmental organisations • Businesses surrounding the project area, and • Ratepayers and homeowners' associations.
Apr 2025	<p>As part of the Traffic Impact Assessment, a focus group meeting was held on 16 April 2025 with identified stakeholders to provide the findings of the Traffic Impact Assessment conducted after the public meeting held on the 15 October 2024. The Traffic Impact Significance based on the Impact Assessment Criteria and Scoring System determined by the Specialist with recommended mitigation measures were also presented,</p> <p>I&APs and State Departments that raised the traffic concerns during the PPP and public meeting were invited to the FGM.</p>
Apr 2025	<p>As part of the update to Atmospheric Impact Assessment and Human health Risk Assessment, a focus group meeting was held on 16 April 2025 with identified stakeholders to provide the findings of the update to Atmospheric Impact Assessment and Human health Risk Assessment conducted after the public meeting held on the 15 October 2024. The Atmospheric Impact and Human Health Risk Impact Significance based on the Impact Assessment Criteria and Scoring System determined by the Specialists with recommended mitigation measures were also presented,</p> <p>I&APs, Environmental Organisations and State Departments that raised the human health concerns during the PPP and public meeting were invited to the FGM.</p>

2.3 AVAILABILITY OF FIRST DRAFT BASIC ASSESSMENT REPORT

The draft BAR was placed on public review for 30 days from **26 September** to **28 October 2024**. Hardcopies were made available at the Laingville Public Library, Vredenburg Library, Saldanha Public Library and Langebaan Public Library. An electronic version of the report was placed on the WSP website to be accessed by the public at the following link: <https://www.wsp.com/en-za/services/public-documents>.

Proof of the placement of the draft BAR in the public domain is included in Appendix F.

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 and SMS) on 26 September 2024. The purpose of the notification was to offer stakeholders the opportunity to register on the project database and the opportunity to comment on the draft BAR. Proof of notification is included in the Appendix.

2.3.2 NEWSPAPER ADVERTISEMENT

Notification of the proposed project as well as the opportunity to comment on the draft BAR was issued to the general public via an advertisement published in the Die Burger and Die Weslander newspapers on 26 September 2024, 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 draft BAR. A copy of the advertisement is included in the Appendix.

2.3.3 SITE NOTICES

The EIA Regulations, 2014 (as amended), require that site notices be fixed at places conspicuous to the public at the boundary or on the fence of the site where the activity (to which the application relates) is to be undertaken, as well as at any alternative sites. Posters (in English and Afrikaans), conforming to the size specifications as per the EIA Regulations, 2014 (as amended), were placed on Thursday 26 September 2024. Refer to Table 2-3 for a description of the site notice locations and for the site notice locations in relation to the project site.

Table 2-3 – Site Notice Locations

No.	Site notice position	Latitude	Longitude
1.	North West corner of the AMSA fence	32°58'17.52"S	18° 0'29.71"E
2.	Lookout point on road TR8501	32°58'13.29"S	18° 1'10.57"E
3.	AMSA Site Entrance 1 from road OP538	32°58'32.71"S	18° 2'32.56"E
4.	AMSA Site Entrance 2 from road OP538	32°59'17.62"S	18° 2'19.13"E
5.	Corner Wildevy Street and Strand St, Langebaan (near Curro Langebaan Primary School)	33° 2'24.90"S	18° 3'2.48"E
6.	Corner Strand St and Loop St, Langebaan	33° 2'22.44"S	18° 3'21.32"E

A copy of the site notice and proof of placement are included in the Appendix.

3 COMMENTS AND RESPONSES

Following the receipt of comments from stakeholders, this Comments and Response Report chapter was prepared. 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 F.6.

Table 3-1 – Comments Received

No.	Comment	Received from and reference	Response
1.	<p>The email notification of 17 March 2023 regarding the variation of the atmospheric emission licence (“AEL”) for the Saldanha Steel (Pty) Ltd (“Saldanha Steel”) steelworks, the Department’s acknowledgement of receipt of the notification and request for the electronic copy of the Atmospheric Impact Report (“AIR”) sent via email on 20 March 2023, and the Atmospheric Impact Report and redacted Application Form received via email on 22 March 2023, refer.</p> <p>Thank you for the opportunity to provide comments on the application for the proposed variation of the AEL that was granted to Saldanha Steel in terms of the National Environmental Management: Air Quality Act, 2004 (Act No. 39 of 2004) (“NEM: AQA”). It is understood that Saldanha Steel, a subsidiary of ArcelorMittal South Africa Limited (“AMSA”), has an existing AEL that is valid until 01 March 2024, which allows for the bulk handling of 2 832 000 tons per annum of lump ore and iron ore pellets, as required for the steelmaking process. Saldanha Steel has been in care and maintenance since 2020 and there are currently no operations occurring at the steelworks site. AMSA has investigated alternatives to enable Saldanha Steel to return a portion of the facility back to economic productivity along with job regeneration at the site. Saldanha Steel intends to establish a logistics hub to store, handle and export the permitted quantity of iron ore. The</p>	<p>Thea Jordan Director: Development Facilitation Email, 26 April 2023</p> <p>Nokulunga Goqo / Etienne Roux Directorate: Air Quality Management Nokulunga.Goqo@westerncape.gov.za / Etienne.Roux@westerncape.gov.za</p> <p>Adri La Meyer Directorate: Development Facilitation Adri.LaMeyer@westerncape.gov.za</p>	<p>It was noted that WCDM confirmed a variation to the current AEL will be required for the proposed Logistic Hub.</p> <p>Importantly, comments received from DEA:DP relate to the 2023 public participation process and draft 2023 AIR. A number of these comments have been addressed in the 2024 AIR, for example, the Logistics Hub will not store or handle iron ore, only commodities as listed in the 2024 AIR section 1.2.1. Furthermore, the bulk commodities will be stored within an enclosed warehouse with operational mitigation measures, to reduce fugitive emissions from the storage, handling and transport of bulk commodities.</p> <p>The inclusion of subcategory 4.21 (Metal Recovery) for the recovery of metal from scrap material, will be brought to the attention of the WCDM, Importantly, if subcategory 4.21 is triggered, this is to be included during the variation process.</p> <p>The scrap material is used in the Steel Meltshop as feed material into the Conarc furnace as indicated in the AIR in ‘Section 1.2.1 Process Descriptions’ and ‘Table 3-1’. Scrap material is stored at the Laydown area. Additionally, activities at the Laydown area are ad hoc, and generally the area remains empty, therefore the area was assessed for wind erosion emissions within Scenario 1: Steelmaking operations. Clarity to the storage of scrap material will be addressed in the revised AIR.</p> <p>The are no predicted exceedances of the NAAQS and dust control regulations from the proposed Logistics Hub operations as per the updated dispersion modelling conducted for the 2024 AIR and Addendum to the AIR. The AIR displays predicted exceedances at the eastern fenceline. It was</p>

No.	Comment	Received from and reference	Response
	<p>licensing authority, West Coast District Municipality (“WCDM”) has confirmed that the AEL for Saldanha Steel does allow for the handling of iron ore; however, this is for the steelmaking sector, and not for the export sector. Therefore, to commission the proposed logistics hub, Saldanha Steel is required to apply for a variation of its AEL. The AIR assessed two scenarios: establishing a logistics hub process without the steelmaking operation (Scenario 2) and establishing a logistics hub process with the steelmaking process (Scenario 3). The AIR states that at no time will both logistics hub processes occur simultaneously; it will either be Scenario 2 or Scenario 3.</p> <p>AIR Comments</p> <p>The AIR indicates that the Saldanha Steel facility has an AEL (reference number WC/WC/020) as the existing steelmaking facility triggers the following listed activities in terms of the List of activities which result in atmospheric emissions which have or may have a significant detrimental effect on the environment, including health, social conditions, economic conditions, ecological conditions or cultural heritage published in Government Notice (“GN”) No. 893 dated 22 November 2013 (as amended) in terms of section 21(1)(b) of the NEM: AQA, 2004:</p> <ul style="list-style-type: none"> - Category 4: Metallurgical Industry: Subcategories 4.2, 4.6, 4.7, 4.8, 4.11 and 4.12. 		<p>determined that the unpaved entrance haul road was the main contributor to the predicted elevated concentrations. Given this outcome, AMSA have indicated that a portion of the haul road will be paved to reduce the emissions from vehicular entrainment. The positive impact of paving the haul road is presented in the Addendum to the AIR and there are no predicted exceedances of the NAAQS and National Dust Control Regulations.</p> <p>The comments on the AIR are noted and will be addressed in the revised AIR for the Logistics Hub application.</p>

No.	Comment	Received from and reference	Response
	<p>- Category 5: Mineral Processing, Storage and Handling: Subcategories 5.1 and 5.2.</p> <p>The variation of the AEL being applied for, is for the inclusion of storage and handling of bulk materials, notably iron ore, for export through the Transnet Port Terminals at Saldanha Bay</p> <p>Page 20 states that “The Steel Meltshop may operate on Scrap only as an input material to produce steel”. Furthermore, Table 3-3 of the AIR and condition 6.1 of the AEL indicate the use of scrap and steel scrap as raw material used in the steelmaking process. However, Subcategory 4.21 (Metal Recovery) of GN No. 893 of 22 November 2013 (as amended), which is indicated as “The recovery of metal from any form of scrap material by the application of heat”, is not included as one of the triggered listed activities. Clarity is to be provided regarding the applicability of the Subcategory 4.21 for the existing Saldanha Steel facility. The WCDM should be engaged in this regard.</p> <p>Page 22 states that: “Importantly, at no time will both of the above Logistics Hub processes occur simultaneously; it will either be Scenario 2 or Scenario 3”. This statement appears to contradict Scenario 4 (a cumulative assessment of Scenarios 1 and 3). Clarity is requested in this regard.</p> <p>The AIR does not provide any indication of where scrap is kept at the facility, nor the stage</p>		

No.	Comment	Received from and reference	Response
	<p>of the process flow where the scrap is used. Clarity is to be provided in this regard.</p> <p>The PM10 24-hour concentrations are predicted to exceed the 24-hour average National Ambient Air Quality Standard (“NAAQS”) past the Saldanha Steel fence-line, extending towards the north.</p> <p>Maximum fence-line concentrations for PM2.5 and PM10 are predicted to exceed their respective NAAQS.</p> <p>Scenario 1 (Saldanha Steel steelmaking operations only) indicates that the non-residential standard for dust is predicted to be exceeded on the northern fence-line of the Saldanha Steel facility.</p> <p>Please note the following requirements for any facility of this nature:</p> <p>Best practice measures intended to minimise potential air pollutants on-site are to be implemented to reduce emissions to the surrounding environment; and</p> <p>All Minimum Emission Standards relating to all listed activities in terms of section 21 of the NEM: AQA, 2004 that are triggered, must always be complied with.</p> <p>This Directorate has the following comments, noting that the final decision rests with the licensing authority:</p> <p>Clarity is to be sought from the licensing authority regarding the applicability of</p>		

No.	Comment	Received from and reference	Response
	<p>Subcategory 4.21 to Scenario 1 and the implications for the AEL variation application.</p> <p>The predicted exceedances in respect of PM2.5 and PM10, as well as dust fallout rates, and the possible impacts that such pollutants may have on the receiving environment, are not acceptable. In this regard, the AEL variation application is not supported, without the implementation of appropriate mitigation measures at Saldanha Steel, to ensure that the NAAQS and dust fallout rates are not exceeded. The applicant is to address this with the licensing authority.</p> <p>The Directorate notes the WCDM's letter dated 23 March 2023 as addressed to the applicant, regarding the Municipality's stance with regards to the storage and handling of ore or any other material with the potential to generate fugitive dust.</p> <p>It is understood from the letter that any facility applying for a new AEL, or a variation of an existing AEL, for the introduction of the storage and handling of ore or any other material with the potential to generate fugitive dust, must ensure that such ore and/or materials are stored and handled within an enclosed warehouse or structure that will contain fugitive dust and prevent it from escaping into the receiving environment. The letter further states that "Based on the stance taken by the West Coast District Municipality and the information provided, the West Coast District Municipality</p>		

No.	Comment	Received from and reference	Response
	<p>does not support nor can consider this application.”</p> <p>Given the above, the Directorate herewith encourages the applicant to engage with the WCDM, to find a suitable way forward to address this matter.</p> <p>The abovementioned comments/recommendation do not pre-empt the outcome of the AEL variation application. No information provided, views expressed and/or comments made by this Directorate should in any way be seen as an indication or confirmation that additional information or documents will not be requested; or of the outcome of any application submitted to the licensing authority</p> <p>The findings of the Tier 3 modelling undertaken for the AEL variation application indicates a few exceedances of PM10 and PM2.5 concentrations at some receptors during the steelmaking process (Scenario 1).</p> <p>During both processes for the proposed logistics hub (Scenarios 2 and 3), PM10, PM2.5 and dust fall rates would be below the relevant standard.</p> <p>However, should the logistics hub and steelmaking facility operate simultaneously (Scenario 4), it was noted that marginal increases and exceedances of the NAAQS for PM10 and PM2.5 concentrations could be expected. The predicted exceedances are</p>		

No.	Comment	Received from and reference	Response
	<p>expected due to existing steelmaking activities, rather than the logistics hub.</p> <p>For Scenario 4, dust fallout rates are predicted to remain well below the residential standard at all residential sensitive receptors, although fence-line fallout rates are predicted to exceed the non-residential standard. Increases in dust fallout rates (average of 0.34%) are deemed to be negligible with the addition of the logistics hub. The predicted exceedance of fence-line dust fall was deemed to be due to existing steelmaking activities.</p> <p>In general, air quality impacts associated with the logistics hub are predicted to be low, with little impact on the receiving environment.</p> <p>Should steelmaking need to restart and operate simultaneously with the proposed logistics hub, overall contributions from the logistics hub under the cumulative scenario (Scenario 4) are deemed as low. However, the predicted exceedances associated with the steelmaking process cannot be ignored, and as such, the recommendations proposed in the AIR should be considered for implementation by Saldanha Steel, and as a condition of approval for the AEL variation application by WCDM.</p> <p>Due to the technical nature of the AIR, this Directorate is unable to provide further comments on the AEL variation application.</p> <p>The applicant is reminded of its “duty of care” prescribed in section 28 of the National</p>		

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	Environmental Management Act, 1998 (Act No. 107 of 1998”) which states that “Every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring, or, in so far as such harm to the environment is authorised by law or cannot reasonably be avoided or stopped, to minimise and rectify such pollution or degradation of the environment”.		
2.	<p>Dear WSP PPP Team,</p> <p>Your email of 26 September 2024 refers.</p> <p>The Department provided comments on the AEL renewal and AEL variation applications during 2023. Whereas the AEL (WC/WC/020) for AMSA was renewed, the application for the variation of the AEL for the proposed iron ore logistics hub has been withdrawn. I note from your website that only the Draft BAR for the EIA application is available for comments. The AIR is available, but not the AEL Variation Application Form. Can you please indicate if the AEL variation application will be separate from the BA application?</p> <p>Note that the Directorate: Development Facilitation will not collate comments from the various directorates within the Department seeing that our Development Management Directorate is the CA for the BA application. You are therefore requested to engage directly with</p>	<p>Adri La Meyer</p> <p>Directorate: Development Facilitation r: Department of Environmental Affairs and Development Planning Western Cape Government</p> <p>Email, 26 September 2024</p>	<p>The response referring to the comments made by the Directorate previously is noted. The AEL was renewed in 2024 and the variation application to the AEL was withdrawn.</p> <p>The AEL variation application is separate to the BA application, and the WCDM as the CA for the AEL variation application is aware of the proposed Logistics Hub and variation application.</p> <p>The other departments in the DEA&DP are included in the I&AP database and the comments for each department will be collated by WSP.</p>

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	the relevant directorates within the Department for their comments. We will however collate comments on the AEL variation application once it is available for comments.		
3.	<p>Good day</p> <p>Please find our registration sheet (To our members: do you have any other comments at this stage?)</p> <p><i>Attachment:</i> Absolutely strict control over heavy metal dust / effluent/ stormwater to avoid such entering the bay / sea. Specialist study on this risk is vital.</p> <p>Farming with mussels + oysters in Saldanha, our food safety regulations (also for export) are very strict regarding heavy metals (particularly Lead and Calcium) thus: any risk of such pollution into the bay has very severe consequences for our industry.</p>	<p>Vos Pienaar</p> <p>Chairperson: Bivalve Shellfish Farmers Association Email, 27 September 2024</p>	<p>The engineering, operation and administrative controls were considered for the project and included in the Environmental Management Programme (EMPr) and the Fugitive Emissions and Dust Management Plan (FDMP). These reports are submitted with the Basic Assessment Report to DEA&DP for review and approval. Should the project be approved, these mitigation measures must be implemented on site. If these are not implemented on site to ensure the environmental, health and safety risk are minimised and controlled, the project may be stopped and the proponent liable for a fine. The Atmospheric Impact Assessment considered the dust fallout for the logistics hub activities. All residential sensitive receptor fallout rates remain well below the residential standard of 600 mg/m²/day, with highest fallout rates predicted at Camp St (at south boundary fence line), with a rate of 30 mg/m²/day predicted, remaining well below the standard. With wind direction generally from south east to north west, lower dust fallout rates were predicted for the port. Furthermore, dust fallout monitoring will be conducted onsite with two monitoring points west and south west of the warehouse to monitor dust fallout from onsite activities.</p>
4.	I am attaching your registration and comment sheet for the above project, which is being managed by WSP.	<p>John Selby</p> <p>Langebaan Residents Association</p> <p>Email, 28 September 2024</p>	<p>Good day John</p> <p>Thank you for your comments.</p> <p>Kindly indicate whether the people in copy should be included on the stakeholder database.</p>

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	<p>In addition, I have attached a sheet giving more detailed comments than the space available on your comment sheet.</p> <p>These comments are from the Team Langebaan Residents Association.</p> <p>Would you please acknowledge receipt of this email and its attachments</p> <ol style="list-style-type: none"> 1. Increase in road traffic 2. Windblown dust 3. Manganese ore 4. Radioactive minerals, 5. Transport to Port 6. Dust suppression 7. Job creation <p><i>Attachment:</i></p> <p>The following concerns are raised by Team Langebaan Residents Association (TLRA) Sept 28 2024</p> <ol style="list-style-type: none"> 1. TLRA is concerned about the issue of increased road traffic on the surrounding roads which are already congested with heavy vehicles. 2. The project should look at the cumulative effect of increased heavy transport of the surrounding road network. 		<ol style="list-style-type: none"> 1. The concern regarding increased traffic was addressed with the traffic impact assessment (TIA) conducted for the proposed project. The conclusion from the TIA was that the proposed activity traffic of 26 vehicles during peak hour traffic is less than 50 peak hour trips for the operational phase and will have an insignificant impact on the surrounding road network. 2. The cumulative impact for traffic also does not add significant capacity to the road class. The current roads are operating at a lower capacity than their design. This was confirmed with the Western Cape Road Network Information System (WCRNIS). 3. The concern to totally close the conveyors is noted and can be investigated during the detailed design of the logistics hub or in the event that dust monitoring indicates exceedances attributed to the conveyer system. Engineers have advised that the conveyors are not fully closed for operational reasons, to facilitate immediate maintenance or day-to-day inspections that may be required for sprayers, commodities, etc. The enclosed side of the conveyors will be wind facing to minimise impact of wind on dust generation. This design feature was included in the atmospheric and dispersion model and dust generation was well within occupational and residential emission standards. 4. The health impact for handling manganese was considered in the AIR, the Human Health Impact Assessment, EMP_r, and FDMP and the mitigation measures for staff to wear PPE and dust mitigation measures was identified as a requirement and is included in the EMP_r and FDMP.

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	<p>3. TLRA is concerned about the issue of managing windblown material in an area of high prevailing winds, especially considering that the Hub is intended for a variety of materials many of which will be sensitive to contamination by windblown materials. It was suggested that the conveyor system feeding the warehouse be totally enclosed as there are range of wind directions in the area.</p> <p>4. One of the major users of the Hub appears to be the manganese ore producers. TLRA wishes to point out that manganese ore dust is a risk for human health as it can affect the human nervous system. It is likely that operators on the facility will need protection from the manganese ore dust and in addition the spread of such dust while ship loading could impact of surrounding communities.</p> <p>5. It is also noted that Zircon is one of the materials destined for the warehouse is radioactive; being classed as NORM (Naturally Occurring Radioactive Material). It was recommended that the owner/operator of the Hub contact the National Nuclear Regulator for more guidance especially for workers potentially exposed to the material.</p> <p>6. Another product destined for the Hub is phosphate rock. It is noted that if the phosphate rock has an igneous source, it</p>		<p>The ship loading is controlled by TNPA and all operators at the Port. AMSA will endeavour to ensure that dust emissions are minimised during ship loading to the extent possible as AMSA is not a Port Operator. New loading technologies for commodities onto ships are considered and will be motivated.</p> <p>5. Prior to receiving and handling Zircon or a material with radioactivity levels greater than 0.5Bq/g per radionuclide, licencing is required in terms of the NNR Regulations, a radiation impact assessment addressing prior work and public safety assessment, and radiological baseline is required. It was confirmed that the licencing application to handle Zircon is not required prior to receiving the EA, but prior to handling the Zircon. AMSA will submit the necessary application before operation.</p> <p>6. The SDS for Phosphate Rock indicated the uranium content is sufficiently low that it is not considered radioactive material. Similarly to Zircon, should any assessments or licencing be required, this will be conducted prior to receiving and handling of the material.</p> <p>7. It should be noted that tipper trucks have a mechanically operated tarpaulin covering system that is user friendly to use to cover the trucks. Newer designs have closing systems which are physically integrated with skips which will be tested and systematically integrated. This will be monitored by onsite staff during operation and implementation of the EMPr will be a condition of any EA obtained.</p> <p>8. The final design and construction of the warehouse will ensure to minimise dust generation from the warehouse. Prior to offloading and while stockpiled, commodities will</p>

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	<p>could also be radioactive. This is unlikely if the phosphate rock has a sedimentary origin.</p> <p>7. It appears that the trucks to be used for transporting products from the Hub to the ship loading areas would be covered to prevent the material being spread by the strong winds. It is noted that while commendable, the use of truck covers was not very user friendly and a good management system would be needed to ensure correct usage.</p> <p>8. It is understood that the operation of the warehouse would include entry and exit from the East side to avoid the westerly winds. TLRA is concerned that the prevailing SE winds may also cause a problem with wind control in the warehouse.</p> <p>9. It is understood that the use of water sprays and dust suppressing chemicals could be used in the ware house. However, TLRA is concerned that many the potential products listed were moisture sensitive and could not be sprayed. Also, if sprays were to be used the warehouse would need a liquid run off facility to ensure that no water borne contents were allowed to escape the facility.</p> <p>10. Job creation is described and it appears that the facility will be operated by mechanical equipment not requiring much</p>		<p>be sprayed to minimise dust generation. A daily cleaning routine of the warehouse entrance will also be conducted to minimise dust carried away from the warehouse.</p> <p>9. The commodities will be handled by supplier and purchaser requirements; however, a handling requirement is to minimise dust generation. The stockyard's floor area is sloped toward the stormwater channel that caters for run-off water.</p> <p>The stormwater management system on site is designed as a comprehensive gravity-fed network of surface channels and sumps, ultimately discharging into a stormwater dam located at the water plant. This system effectively manages surface water runoff across the site, including from wash bays, hard standing areas, and will include the new proposed warehouse.</p> <p>Stormwater is conveyed via a network of open channels that direct runoff towards strategically placed sumps. These sumps perform a dual function: they allow for the settling of sediments and provide a basic level of oil separation, improving the quality of water entering the dam.</p> <p>All paved and operational areas — including wash bays and hard standing zones — are fully integrated into the stormwater network to ensure efficient collection and conveyance of runoff. The new warehouse floor has been designed with a gentle slope directing any water runoff, including dust suppression activities for material stockpiles, into a dedicated stormwater channel. This channel connects directly into the existing site-wide system to ensure consistent and controlled flow.</p>

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	human intervention. The TLRA requested that the project not be described as a job creation opportunity as this would cause discontent in the local community when little to no jobs materialized.		<p>To maintain the system's effectiveness, weekly visual inspections are conducted. Any channels or sumps showing signs of sediment accumulation will be cleaned as required. All sediment removed during this process will be collected in designated waste disposal skips and disposed of in accordance with the site-wide waste management license conditions. The system has been designed not only to manage stormwater effectively and responsibly but also to minimize environmental impact by reducing the risk of localized flooding and controlling pollution at source.</p> <p>10. Even though mechanical equipment is proposed for the logistics hub and warehouse, 139 direct jobs will be required for the hub which was confirmed by the proponent. A further 114 jobs are expected to materialise through second-round suppliers. These jobs occur when suppliers of new goods and services to the appointed companies (first-round suppliers) experience larger markets and the potential to expand. Given there is currently no commercial activity occurring on the Saldanha Steel site, it is reasonable to assert that the facility will generate more employment opportunities than which currently exists.</p>
5.	<p>Kindly register SANParks (Westcoast national park) as an interested and affected party.</p> <p>Persons who will be making submissions:</p> <p>Jeffery Manuel</p> <p>Jeffery.Manuel@sanparks.org</p>	<p>Moses Mulaudzi</p> <p>Intern: Environmental Authorisation, commenting and coordination</p> <p>South African National Parks (SANParks)</p> <p>Email, 01 October 2024</p>	<p>Good day Moses</p> <p>Please note that Jeffery and you have been registered on our stakeholder database.</p> <p>Kind regards,</p>

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6.	Please register me on the Interested and Affected Parties (I&APs) list. The Chief Directorate Aquaculture Development and Freshwater Fisheries hold one of the three environmental authorisations for aquaculture development in the Bay and DFFE, Branch Fisheries Management is the only Department responsible for aquaculture development and management.	Maxhoba-ayakhawuleza Jezile Environmental Officer Specialised Production Department of Forestry, Fisheries and the Environment Email, 01 October 2024	Good day Maxhoba Thank you for letting us know. Please note that you have been registered on the stakeholder database. Kindly confirm if the people in copy should also be registered. Kind regards,
7.	I represent those people who I copied so there's no need to add them to the stakeholder database.	John Selby Team Langebaan Residents Association (TLRA) Email, 02 October 2024	Only Mr John Selby was registered to the I&AP database.
8.	Please find attached the completed Registration and Comments sheet. 1. Job creation 2. Skills development 3. Economic Growth 4. Infrastructure Improvement 5. Community upliftment The lack of meaningful community consolidation and transparency. This can lead to a sense of disfranchisement, where resident feel left out or overlooked in favour of corporate or government interest.	Eugene Du toit CEO: Legacy Roads and Civils Email, 02 October 2024, I&AP responded on Registration and Comments Sheet	The Basic Assessment process included an economic assessment of the project completed by Urban Econ. The findings of this study address the five points raised. Furthermore, the basic assessment process has included the regulatory public participation process which has involved notification of the project and access to the draft documentation for review and comment. In addition to this, an enhanced engagement process has been conducted by means of focus group meetings with key stakeholders to discuss the primary concerns related to transport and air quality based on the activities associated with the Logistics Hub. The second draft of the Basic Assessment Report has been released for public review and comment as a result of two additional specialist studies being included in the report, namely the Transport Impact Assessment and the Human Health Risk Assessment in response to issues raised by IAPs in the public disclosure period conducted for the first Basic

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			Assessment Report. This public disclosure has ensured better transparency of the project to the community.
6.	<p>Interest as required in terms of GNR 326 (EIA Process regulation) AfriSam are the owners of the neighbouring farm (Saldanha Farm 1139) and also have interests in the utilisation of the TFR/TNPA haul road that would be utilised for this initiative</p> <p>Project related concerns AfriSam have interests in the utilisation of the TFR/TNPA haul road that is already heavily utilised and there are a number of other back of port initiatives in the pipeline that will add to the congestion on this road.</p>	<p>Gavin Venter Strategic Projects Manager - AfriSam Email, 02 October 2024</p>	<p>AMSA forms part of the haul road committee, that already meets routinely, where such concerns and issues are discussed and addressed.</p>
7.	<p>Good Afternoon , I trust you are doing well.</p> <p>I just want to confirm if Adele Groenewald , Marlon Saayman and Werner Labuschagne is registered as interested and affected parties for the proposed logistic hub at the Saldanha steel facility. If the three of us are registered, can we please ensure it as representing Transnet Port Terminals not Transnet National Ports Authority.</p>	<p>Marlon Saayman SHEQ Manager – Iron Ore terminal Transnet Port Terminals Email, 03 October 2024</p>	<p>Good day Marlon, Werner Labuschagne has been registered on the project database. The details of Nicole Abrahams have been updated. Adele Groenewald and yourself were registered on the database. Kind regards,</p>
8.	<p>Attached please find Atlantis Marine Projects Pty Ltd, Registration as Interested & Affected Party for the AMSA EIA and AEL authorisation.</p>	<p>Brian Blackbeard Managing Director Atlantis Marine Projects</p>	<p>Atlantis Marine Projects Pty Ltd represented by Mr Brain Blackbeard were included in the I&AP database. The Atmospheric Impact Assessment considered the potential emissions generated and the dust fallout for the logistics hub</p>

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	<p>Please confirm receipt and registration.</p> <p>Business owner of marine company operating in Saldanha Bay.</p> <p>Adding additional fugitive dust to the already saturated receiving environment.</p> <p>Exceedances of the air quality regulations.</p>	Email, 04 October 2024	<p>activities. All residential sensitive receptor fallout rates remain well below the residential standard of 600 mg/m²/day, with highest fallout rates predicted at Camp St (at south boundary fence line), with a rate of 30 mg/m²/day predicted, remaining well below the standard.</p> <p>The engineering, operation and administrative controls were considered for the project to minimise dust generation and included in the Environmental Management Programme (EMPr) and the Fugitive Emissions and Dust Management Plan (FDMP). These reports are submitted with the Basic Assessment Report to DEA&DP. Should the project be approved, the mitigation measures must be implemented on site. If these are not implemented to ensure the environment, health and safety risk are minimised and controlled, the project may be stopped and the proponent liable for a fine.</p> <p>Furthermore, dust fallout monitoring will be conducted onsite with eight (8) monitoring points surrounding the site to monitor dust fallout from onsite activities.</p>
9.	<p>I'd formally like to apply as a stakeholder in the case of ArcelorMittal South Africa in Saldanha Bay.</p> <p>Please see attached requisition documentation.</p> <p><i>Attachment:</i> Air pollution (dust pollution especially) significantly impacts properties that I own on the west coast and their value. Adverse health effects on staff.</p> <p>I am concerned that given Transnet and AMSA have previously been incapable of preventing</p>	<p>Adam Scholtz</p> <p>Mitscho Retail Barriers</p> <p>Email, 07 October 2024</p>	<p>The Atmospheric Impact Assessment considered the emissions generated and the dust fallout for the logistics hub activities. All residential sensitive receptor fallout rates remain well below the residential standard of 600 mg/m²/day, with highest fallout rates predicted at Camp St (at south boundary fence line), with a rate of 30 mg/m²/day predicted, remaining well below the standard.</p> <p>Dust fallout monitoring will be conducted onsite with eight (8) monitoring points surrounding the site to monitor dust fallout from onsite activities.</p> <p>A human health risk assessment was conducted for the project. Refer to BAR Specialist Study Appendix for full report.</p>

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	<p>very significant dust staining on Saldanha Bay that has increase in ore handling will only make the situation worse.</p> <p>That an increase in materials being stored will further increase the dust problem on the west coast.</p>		<p>The Hazard Quotient calculated for the Logistics Hub for all pollutants of concern were below 1 at all receptor points and indicate that it would be unlikely for any individual to develop adverse health effects from exposure to the modelled PM_{2.5}, manganese, lead and silica when using South African standards, WHO guidelines, IRIS guidelines (from the US-EPA) or the Centres for Disease Control (CDC) guideline.</p> <p>The warehouse is proposed for the logistics hub to minimise dust generation. The engineering, operation and administrative controls were considered for the project to minimise dust generation and included in the EMP_r and the FDMP. These reports are submitted with the Basic Assessment Report to DEA&DP. Should the project be approved, the mitigation measures must be implemented on site. If these are not implemented to ensure the environment, health and safety risks are minimised and controlled, the project may be stopped and the proponent liable for a fine.</p>
10.	<p>With reference to the proposed AMSA/BPO logistics hub, please find attached comments from the West Coast District Municipality for your attention.</p> <p>It is noted that:</p> <ol style="list-style-type: none"> The application is made to accommodate a warehouse for storage and handling of bulk material commodities, not exceeding 5,000,000 tons per annum, for export through the Transnet Port Terminals. It is noted that the proposed warehouse will be linked to existing handling and conveyancing systems 	<p>Cindy Ganten-Bein Manager: Air Quality West Coast District Municipality Email, 08 October 2024</p>	<p>The comments and mitigation measures proposed by Mrs Ganten-Bein were included in the revised FDMP and the EMP_r.</p> <p>Importantly, comments referring to increased mitigation measures in the event that current mitigation is deemed to not be adequate have been included in the FDMP and EMP_r. The FDMP and EMP_r are considered live documents and will be amended as required to minimise environmental impacts. All identified mitigation measures are to be implemented prior to commissioning activities and remain ongoing for the duration of the operation. Both DEADP and WCDM will be notified of any proposed mitigation measure changes and correct legal processes will be followed to amend the FDMP or EMP_r.</p>

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	<p>b. The bulk material commodities will be stored and handled within a fully enclosed warehouse and activities will take place within the warehouse, with the exclusion of a rotary tippler and the conveyor extending from the rotary tippler to the enclosed warehouse.</p> <p>c. The Logistics Hub proposes to store and handle the following commodities:</p> <ul style="list-style-type: none"> • Manganese Ore (maximum tonnage: 4,000,000 tpa) • Phosphate Concentrate (maximum tonnage: 1,200,000 tpa) • Garnet Sands (maximum tonnage: 500,000 tpa) • Zircon Sands (maximum tonnage: 500,000 tpa) • Lead Concentrate (maximum tonnage: 250,000 tpa) • Copper Concentrate (maximum tonnage: 250,000 tpa) • Zinc Concentrate (maximum tonnage: 250,000 tpa) <p>d. The individual bulk commodity quantities may fluctuate, depending on the bulk commodity required for export, although importantly, the total quantity of material handled, when operations are underway, will not exceed the threshold stipulated of 5,000,000 tpa.</p> <p>e. Up to 4,000,000 tpa will comprise of Manganese (Mn) ore. Of the 4,000,000 tpa Mn ore, up to 50% will be delivered</p>		<p>A complaints register is currently in place and live. The register will be made available during all phases of operation.</p> <p>The Logistics Hub will make use of an enclosed warehouse for the storage and handling of commodities. The warehouse will have operational mitigation measures to further reduce the generation of fugitive emissions. No material will be stored on open area where fugitive emissions can be produced.</p> <p>The procedure to amend the AEL is noted and will be followed.</p>

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	<p>via rail (2,000,000 tpa), with the remaining amount being delivered by truck (2,000,000 tpa).</p> <p>Preparation, construction and rehabilitation phase</p> <p>Fugitive dust resulting from the preparation, construction and rehabilitation phases must be prevented at all times and if it cannot be prevented then it must be kept to a minimal level.</p> <p>Dust mitigation measures must be implemented and operational prior to the preparation, construction and rehabilitation phases.</p> <p>Dust mitigation measures must continue to be implemented and operational during the preparation, construction and rehabilitation phases.</p> <p>If at any time the implemented dust mitigation measures fail or are not minimising fugitive dust, additional dust mitigation measures must be immediately implemented.</p> <p>A complaints register must be put in place prior to the preparation, construction, operation and rehabilitation phases and be submitted to the licencing authority on a monthly basis.</p> <p>Operational phase</p>		

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	<p>No open air stockpiles will be allowed. All commodities that have the potential to generate fugitive dust must be stored and handled within the enclosed warehouse.</p> <p>Road sweeping is not recommended as fugitive dust is generated if material on roads are dry.</p> <p>The air quality mitigation and management measures as mentioned in the EMPr and the AEL application will be further considered and addressed as conditions within the AEL.</p> <p>All mitigation and management measures as per the EMPr must be applied and maintained at all times. Additional measures to be implemented if the current measures fail or are inadequate.</p> <p>Atmospheric Emission License (AEL) No open air stockpiles will be allowed. All commodities that have the potential to generate fugitive dust must be stored and handled within the enclosed warehouse.</p> <p>Road sweeping is not recommended as fugitive dust is generated if material on roads are dry.</p> <p>The air quality mitigation and management measures as mentioned in the EMPr and the AEL application will be further considered and addressed as conditions within the AEL. This will include conditions such as but not limited to:</p>		

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	<ul style="list-style-type: none"> i. Loading of trucks and skips must take place within the fully enclosed warehouse(s). ii. Skips and trucks must be clean of material dust and spillages before exiting the warehouse and while on route to TPT. This includes tyres, wheel arches and undercarriages. iii. Skips and trucks must be clean of material dust, spillages and other material obtained from destination while in transit returning to the Saldanha Steel site. This includes tyres, wheel arches and undercarriages. iv. Skips and truck must be covered at all time while in transit to and from the port, even if empty, and/or while containing a commodity. v. Skips and trucks must be kept in such a manner to prevent windblown fugitive dust even when empty and/or while in storage. vi. A cleaning procedure must be compiled and implemented for the cleaning of skips, trucks and warehouses. vii. Spillages on the Haul road leading from Saldanha Steel to TPT must be contained and removed for disposal on a daily basis and as soon as possible after each shipment. viii. Spillages that may result outside the warehouse and at its entrance must be contained and removed on a continuous daily basis. 		

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	<p>ix. Mitigation measures to capture and contain fugitive dust must be implemented prior to the commissioning of the proposed activity and maintained at all times.</p> <p>x. The internal roads must be kept free from spillages and fugitive dust.</p> <p>The licencing authority reserves the right to instruct for alternative and/or additional mitigation measures if the current or proposed measures are not effective.</p> <p>The proposed activity may not commence prior to the issuing of a varied atmospheric emission licence (AEL). The current AEL must be amended to include the proposed activity.</p> <p>In order for the AEL to be varied, it is required of the licence holder to conduct the following:</p> <ul style="list-style-type: none"> i. Amend the AEL in terms of Section 46 of NEM: AQA and the National Air Quality Management Framework. The competent licencing authority is the West Coast District Municipality. ii. The applicant must obtain an environmental authorisation (EA) from the Department of Environmental Affairs and Development Planning prior to submitting an application to amend the current AEL. 		

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	<ul style="list-style-type: none"> iii. A copy of the granted amended environmental authorisation must be submitted to the licencing authority. iv. The applicant must submit a hard copy AEL variation application form to the licencing authority. The applicant may obtain the prescribe application form from the licencing authority. This form was sent to the applicant. v. The applicant must conduct public participation. This process is underway. vi. Upon completion of this process, the applicant must provide the licencing authority with the comments and response report. The report must also contain proof of advertisement and that the necessary organs of state were inform. vii. A site inspection will be arranged with the applicant. viii. No AEL processing fee is required. <p>After the public participation process is completed and all supporting documentation is obtained, the licencing authority will have 60 days to process the application and issue a decision.</p>		
11.	<p>Please see attached two registration forms: D.W. Albertson And R.D.Albertson Please confirm receipt.</p>	<p>D.W. and Roland Albertson Email,14 October 2024</p>	<p>The request from Mr Albertson to discuss the conveying system with the design team has been noted. The project has not progressed into its final design phase and there is an opportunity for Mr Albertson to engage with the proponent on the conveying design.</p>

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	<p><i>Attachment:</i> Project-related/grievances: - Air pollution I want to discuss the conveying system with the design engineers</p> <p>Project-related/grievances: - Dust generation at transfer points</p>		<p>The engineering, operation and administrative controls were considered for the project to minimise dust generation, and included in the Environmental Management Programme (EMPr) and the Fugitive Emissions and Dust Management Plan (FDMP). These also included dust mitigation measures at transfer points throughout the logistics hub.</p> <p>Furthermore, dust fallout monitoring will be conducted onsite with eight (8) monitoring points surrounding the site to monitor dust fallout from onsite activities. This will determine whether mitigation measures are sufficient.</p>
12.	Kindly know that we want to register as an interested and affected party. We have a local business providing transportation and logistics services and would like to be considered for any available development and empowerment opportunities. Thank you.	<p>Warren Vandermerwe</p> <p>Email</p> <p>14 October 2024</p>	Mr. Vandermerwe was registered to the I&AP database.
13.	<p>Please find included my registration form and complaints against this project.</p> <p><i>Attachment:</i> Handling of dust has been proven to cause uncontrolled pollution and despite all complaints against it the authorities have not been able to control pollution</p> <p>How many jobs exactly are guaranteed and at what positions in the organisation?</p>	<p>Hein White</p> <p>Email, 15 October 2024</p>	<p>Mr White's comments were captured in the project comment register.</p> <p>The comments are noted by Mr White. Several of these comments are addressed in the Economic Impact Assessment report.</p> <p>For this logistics hub which involved the receiving, handling and export of commodities, the WCDM communicated to the proponent that it would only consider this application if the commodities were warehoused (enclosed) when stored and handled on site. The main reason for this was to mitigate dust generation from handling the commodities.</p>

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	<p>Residential investments are being threatened by industrialisation of the area.</p> <p>Pollution in the entire Saldanha district is already at such a level that it is becoming an ugly industrialised area with reduced tourism and residential interest.</p> <p>What % of turnover will be guaranteed to Saldanha community upliftment?</p> <p>Is this a Saldanha owned opportunity or are the real beneficiaries external to Saldanha?</p>		<p>The economic assessment has confirmed that 625 direct, indirect, and induced employment opportunities will be created during construction. A breakdown of positions are provided below.</p> <p>Construction phase:</p> <table><tr><td>Site Agents</td><td>Supervisors</td></tr><tr><td>Safety Officers</td><td>Artisans</td></tr><tr><td>Quality Assurance</td><td>Semi-skilled labour</td></tr><tr><td>Admin clerk</td><td>General labour</td></tr><tr><td>Storeman</td><td></td></tr></table> <p>391 direct, indirect, and induced employment opportunities will be created during the operation phase. A breakdown of positions are provided below.</p> <p>Operation Phase: Operation Team</p> <table><tr><td>Operations manager.</td><td>Weighbridge clerks.</td></tr><tr><td>Shift superintendent.</td><td>Tally clerks.</td></tr><tr><td>Excavator.</td><td>Tippler operator.</td></tr><tr><td>Payloader.</td><td>Locomotive driver.</td></tr><tr><td>Mobile conveyor.</td><td>Shunters.</td></tr><tr><td>ADT driver.</td><td>Watercart drivers.</td></tr><tr><td>Staff bus drivers.</td><td></td></tr></table> <p>Operation Phase: Maintenance Team</p>	Site Agents	Supervisors	Safety Officers	Artisans	Quality Assurance	Semi-skilled labour	Admin clerk	General labour	Storeman		Operations manager.	Weighbridge clerks.	Shift superintendent.	Tally clerks.	Excavator.	Tippler operator.	Payloader.	Locomotive driver.	Mobile conveyor.	Shunters.	ADT driver.	Watercart drivers.	Staff bus drivers.	
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			<table><tr><td>Maintenance foreman</td><td>Services foreman</td></tr><tr><td>Mechanical foreman</td><td>Services artisan</td></tr><tr><td>Mechanical artisans</td><td>Boilermaker</td></tr><tr><td>Electrical foreman</td><td>Apprentices</td></tr><tr><td>Electrical artisans</td><td></td></tr></table> <p>Operation Phase: Finance, Administration and Support</p> <table><tr><td>HR/ Payroll Administrator</td><td>SHERQ controller</td></tr><tr><td>Finance clerk</td><td>Laundry/ cleaners</td></tr><tr><td>Receptionist/ administration</td><td></td></tr></table> <p>The engineering, operation and administrative controls were considered for the project to minimise dust generation, and included in the Environmental Management Programme (EMPr) and the Fugitive Emissions and Dust Management Plan (FDMP). These also included dust mitigation measures at transfer points throughout the logistics hub.</p> <p>Dust fallout monitoring will be conducted onsite with eight (8) monitoring points surrounding the site to monitor dust fallout from onsite activities. This will determine whether mitigation measures are sufficient.</p> <p>Impact During Construction</p> <p>Based on household income for the project, approximately 65%-75% of the total proposed household income will remain in the Saldanha Bay municipality should local staff and contractors be employed as far as practically possible.</p> <table><tr><td>Impact</td><td>Direct</td><td>Indirect</td></tr></table>	Maintenance foreman	Services foreman	Mechanical foreman	Services artisan	Mechanical artisans	Boilermaker	Electrical foreman	Apprentices	Electrical artisans		HR/ Payroll Administrator	SHERQ controller	Finance clerk	Laundry/ cleaners	Receptionist/ administration		Impact	Direct	Indirect
Maintenance foreman	Services foreman																					
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Impact	Direct	Indirect																				

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			<table><tr><td>Production</td><td>R260.1 million</td><td>R218.2 million</td></tr><tr><td>GDP (@2023 value)</td><td>R92.5 million</td><td>R87.4 million</td></tr><tr><td>Jobs</td><td>89</td><td>339</td></tr><tr><td>Household Income (@2023 Rand value)</td><td>R48.1 million</td><td>R37.3 million</td></tr></table> <p>The following sectors will experience greatest positive impact from the construction phase and the benefits can be enhanced for the Saldanha Bay municipality if local staff and contractors are employed, and materials are purchased locally:</p> <ul style="list-style-type: none">- Manufacturing.- Building and construction.- Trade and accommodation.- Real estate and business services.- Government services. <p>Impact During Operation</p> <p>Based on household income for the project, approximately 65%-75% of the total proposed household income will remain in the Saldanha Bay municipality should local staff and contractors be employed as far as practically possible.</p> <table><tr><td>Impact</td><td>Direct</td><td>Indirect</td></tr><tr><td>Production</td><td>R179.8 million</td><td>R118.8 million</td></tr><tr><td>GDP (@2023 value)</td><td>R75.8 million</td><td>R46.1 million</td></tr><tr><td>Jobs</td><td>139</td><td>114</td></tr></table>	Production	R260.1 million	R218.2 million	GDP (@2023 value)	R92.5 million	R87.4 million	Jobs	89	339	Household Income (@2023 Rand value)	R48.1 million	R37.3 million	Impact	Direct	Indirect	Production	R179.8 million	R118.8 million	GDP (@2023 value)	R75.8 million	R46.1 million	Jobs	139	114
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			<table><tr><td>Household Income (@2023 Rand value)</td><td>R42.0 million</td><td>R17.1 million</td></tr></table> <p>The following sectors will experience greatest positive impact from the operation phase and the benefits can be enhanced for the Saldanha Bay municipality if local staff and contractors are employed, and materials are purchased locally:</p> <ul style="list-style-type: none">- Manufacturing.- Trade and accommodation.- Transport and storage.- Real estate and business services.	Household Income (@2023 Rand value)	R42.0 million	R17.1 million
Household Income (@2023 Rand value)	R42.0 million	R17.1 million				
14.	<p>I am tired of fielding this valid question from concerned friends: “Why do you still live in Saldanha of all places?” No significant environmental upgrades have occurred in Saldanha since 1970s.</p> <p>For many years competent international coastal engineers concur with the premises that if your export product can be pushed through a pipe or carried on a conveyor belt the export terminal should not be located in sheltered water.</p> <p>In 1973 when Piet Grobbelaar the Visitor Technical Manager learnt that Saldanha was the designated ore terminal he was unimpressed. Dredging shallow water access channels for the fishing fleet through hardpan calcrete was not</p>	<p>Alan Carnegie</p> <p>Response and comments sheet</p> <p>16 October 2024</p>	<p>As presented in the Basic Assessment and associated EMPr, and the Atmospheric Impact Assessment Report the proposed Logistics Hub will not contribute to dust emissions from its operations on the Saldanha Steel site. Significant mitigation measures in design and in operational measures seek to achieve this.</p>			

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	easy. Sure enough Iscor picked up a R109m tab from a tender price R26m.		
15.	<p>What methodology is used to measure dust levels both onsite and offsite at sensitive receptors i.e. within the affected communities.</p> <p>Are dust buckets being used, if so please supply the monthly reports (is an independent service provider being used?).</p> <p>If online analysers i.e continuous monitoring, are TEOMS or E-Samplers being used, and is monitoring PM10 or PM2.5? – kindly supply the monthly reports and where the community can access the live data. How often are the instruments being serviced and calibrated and by whom?</p> <p>Please supply the atmospheric Emissions Licence (AEL)</p> <p>Please supply the dust Management Plan</p> <p>Please supply MSD's for all products handled in the port.</p> <p>What measures do Transnet use to suppress dust and do Transnet monitor beyond their fenceline?</p>	<p>Des Casey</p> <p>Email, 21 October 2024</p>	<p>The dispersion and modelling methodology to determine the concentration and dust levels are provided in the Atmospheric Impact Assessment Report. This methodology is based on best practice international guidelines.</p> <p>Dust buckets are used as per the American Standard for Testing and Materials method D1739 as recommended by the National Dust Control Regulations (GNR 827 of 2013). to measure dust fallout levels associated with the Saldanha Steel site, and the methodology to quantify the dust fallout are provided in the Atmospheric Impact Assessment Report. An independent service provider/consultant is used to conduct the monitoring. The dust fallout monitoring reports are provided to the competent authority, WCDM, for their review.</p> <p>The current AMSA AEL and FDMP were provided in the documents made available for public review.</p> <p>The dust suppression and monitoring conducted by TNPA is beyond the scope of this Environmental Authorisation application and AEL variation application process.</p>

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16.	Jannie Strydom – jy moet nou corneem. Ek raak nou te oud. Groete Hennie Opgegroeie te Lemoenkloof Ek as grondeienaar teken beswaar aan teen die manganese besoedeling langs ons paaie – sien aangehegte fotos. Ons produseer o.a. koring en vee. Die Sishen/ Saldanha spoorlyn loop oor my grond. Die Velddrif/ Vredenburg pad kruis my grond, asook die Weskuspad ha st. Helenabaai. Hier kom zoo vragte per dag deur heen en weer.	Hennie Steenkamp Response and comments sheet 22 October 2024	The transport of commodities via truck will be covered by tarpaulin to minimise dust during transport. The proposed Logistics Hub will make use of the existing rail network to the northeast of the Saldanha Steel facility for the import of Manganese ore. Importantly, the rail network will transport up to 50% of the total manganese import to the Logistics Hub via the existing rotary tipplers. The existing rail runs parallel to the R27 approximately 3.2km east of Vredenburg; given this distance air quality impacts on sensitive receptors are unlikely. AMSA will endeavour to engage with suppliers of manganese to minimise dust generation from rail wagons. However, AMSA is unable to enforce emission control measures on the rail operators.
17.	Good day Kindly provide me with the application documents of 41103718 development or refer me to where and how to download the documents.	Moses Mulaudzi SANParks Email, 24 October 2024	Good day Moses Please see the link below: https://www.wsp.com/en-za/services/public-documents Kind regards,
18.		Moses Mulaudzi SANParks Phone call, 25 October 2024	Morning Moses, Thank you for your call. The link to the public disclosure site was provided in the adverts/site notice, emails and notifications for the public participation process. I have provided this below for your convenience: https://www.wsp.com/en-za/services/public-documents

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			The project is the 7th project on the list – so kindly scroll down the landing page and you will find the links to all documents, the BAR and its appendices. Please see below screengrab from the landing page.
19.	Thank you for taking my call. Just confirming the extension for this application for Friday, 1 November.	Palesa Mothiba Email, 28 October 2024	The extension was confirmed by the EAP.
20.	<p>As the Red Dust Action Group, representing well over 1000 members, we hereby request that there be an extension granted for the submission of comments for the proposed AMSA/Bidvest Logistics Hub for a period of 30 days.</p> <p>We feel that since we played an integral part in bringing this project to public attention, the period from the meeting on the 15th of October 2024 until the closing date of the 28th of October 2024 is too short and has not allowed organisations and individuals the time to formulate formal responses.</p> <p>By not extending the period, we feel that the AMSA/Bidvest Logistics Hub project would have failed to have taken the communities views into account.</p> <p>We have established a specialist team who will be meeting to propose a submission on behalf of the RDAG and we highly encourage a workshop whereby we're able to propose these comments</p>	<p>Kyle John Dods</p> <p>Member – Red Dust Action Group</p> <p>Email, 28 October 2024</p>	<p><u>Response 1:</u></p> <p>Thank you for your email.</p> <p>We note your request for an extension of the public participation comment period of an additional 30 days. Although we understand the need, the EIA Regulations prescribe the timelines of an application of this nature only providing 90days from application to submission of final documents. We are already on day 53 of this timeline on the 28th October 2024 (today), the current comment period closing date. On this bases, a period of an additional 14 days can be provided as an extension of the comment period, closing on the 12th November 2024. The Project Company has agreed to make a formal request for extension to the prescribed timeframes, provided for under the Regulations.</p> <p>Can we therefore respectfully request that comments are provided on or before the 12th November 2024</p> <p><u>Response 2:</u></p>

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	and actions needed to mitigate the impact on the area.		<p>I hope you're well. As requested, please find attached the AMSA BPO Logistics Hub Presentation that was presented during the public meeting.</p> <p><u>Response 3:</u> Thank you for your email.</p> <p>We will send a reminder notification that the closure period ends today, to encourage those that have comments to submit these. The notification will go to the full database which will now include those attendees at the meeting that signed the attendance register.</p> <p>As explained, the project is on a tight regulated timeframe and there is still significant work involved in collating and providing a response to all comments received. WSP have already received a fair number of comments which shows a positive level of participation.</p> <p>The task now is to start preparing the Comments and Response report, and await outcomes of the focus group meetings and the RDAG comments before we can finalise this report on the 12th of November. Due to project timeframe constraints as explained previously, it's not possible to offer a blanket extension. However, if you know of specific individuals that might need more time, please encourage them to send me an email to ask for a specific time extension (this is usually a couple of days). That way we know what we still expecting and can provide evidence of following up.</p>
21.	How will the contaminated water used for hosing down trucks and roads be disposed of?	Tracy Lee Dogon Response and comments sheet 28 October 2024	The stormwater management system on site is designed as a comprehensive gravity-fed network of surface channels and sumps, ultimately discharging into a stormwater dam located at the water plant. This system effectively manages surface

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	<p>The NW winter winds will impact Langebaan if the various items to be stored are not transported in (sealed) containers.</p> <p>I am very concerned with the transportation arrangements and unsealed containers of various hazardous items in the wind we experience all the time on the west coast.</p>		<p>water runoff across the site, including from wash bays, hard standing areas, and will include the new proposed warehouse.</p> <p>Stormwater is conveyed via a network of open channels that direct runoff towards strategically placed sumps. These sumps perform a dual function: they allow for the settling of sediments and provide a basic level of oil separation, improving the quality of water entering the dam.</p> <p>All paved and operational areas — including wash bays and hard standing zones — are fully integrated into the stormwater network to ensure efficient collection and conveyance of runoff. The new warehouse floor has been designed with a gentle slope directing any water runoff, including dust suppression activities for material stockpiles, into a dedicated stormwater channel. This channel connects directly into the existing site-wide system to ensure consistent and controlled flow.</p> <p>To maintain the system's effectiveness, weekly visual inspections are conducted. Any channels or sumps showing signs of sediment accumulation will be cleaned as required. All sediment removed during this process will be collected in designated waste disposal skips and disposed of in accordance with the site-wide waste management license conditions. The system has been designed not only to manage stormwater effectively and responsibly but also to minimize environmental impact by reducing the risk of localized flooding and controlling pollution at source.</p> <p>The manganese and commodities will be transported in trucks covered by tarpaulins to the Saldanha site, and between the logistics hub warehouse and TPT for export. Dust mitigation measures will be implemented on site to minimise dust fallout beyond the site.</p>

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			AMSA will endeavour to engage with suppliers and transporters of manganese to minimise dust generation of manganese from rail wagons. As a purchaser and handler of commodities, AMSA will however not be able to enforce or monitor mitigation measures on suppliers and transporters of the commodities.
22.	<p>Good Day</p> <p>Thank you for your email.</p> <p>Please note that comments were drafted and is pending signature at this stage.</p> <p>Regards</p>	<p>Natasha Bieding</p> <p>Directorate: Development Management (Region 1)</p> <p>Email, 28 October 2024</p>	Mrs Bieding's comment was captured in the project comment register.
23.	<p>We are writing to register serious concerns regarding the inadequacy of the consultation process for ArcelorMittal South Africa (AMSA)'s application for Environmental Authorisation and the amendment to the Atmospheric Emission Licence for the proposed logistics hub at the Saldanha Steel facility.</p> <p>This logistics hub represents a significant development with far-reaching environmental, economic, and social impacts on the local community and beyond. Although the Background Information Document (BID) outlines the project's scope and objectives, it is unacceptable that stakeholders, including those</p>	<p>Khethamahle Buthelezi/ Natalie- Jane Van Wyk</p> <p>The Green Connection</p> <p>Letter, 28 October 2024</p>	Due to the proposed development of the Logistics Hub including the warehouse, additional infrastructure and facilities, and operations and activities of the project, the negative impacts identified were of a low to medium significance. The negative medium impact identified was the health of the staff working on site due to exposure of particulate matter of commodities that could negatively impact health. However, this impact will be monitored with mitigation measures included in the EMP and FDMP that address engineering, operation and administrative controls. Other negative impacts after mitigation only impacted had an impact on the site and immediately adjacent to the site. The negative impacts with significance ranking for the proposed activity are included in the BAR Section H, Point 4.

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	<p>directly affected by AMSA's operations, were inadequately informed and afforded limited opportunity for meaningful engagement.</p> <p>It came to our attention on 15 October—through a community member inquiring about the project—that the BID was available. When we sought to access a hardcopy at the Langebaan library on 16 October, no such document was present. Community leaders have since expressed deep concerns over the insufficient consultation efforts, feeling excluded from a process that demands their participation.</p> <p>The Green Connection is clear on this matter: the consultation has been wholly insufficient. The community was not properly informed, nor was adequate time allotted for valuable input. Given the critical insights they bring, this process falls far short of what is required for legitimate community engagement.</p> <p>We therefore request an extension of the consultation period, and that relevant document be sent directly to us for comment. Please inform us of the steps you will take to address this lack of consultation with community leaders.</p> <p>Thank you for your prompt attention to this matter. We anticipate a transparent and meaningful engagement moving forward.</p>		<p>Due to this, the identified stakeholders that were consulted during the project were therefore neighbouring landowners and land users, industries within proximity to the site, environmental organisations, businesses within and surrounding the project area, ratepayer and homeowner associations. List of identified stakeholders, organisations, local councillors, and I&APs engaged with are included in Appendix F.5.</p> <p>Hard copies of all reports were available at the libraries listed below during the 30-day PPP period. Hard copies were only removed from libraries at the end of the PPP period.</p> <p>The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs were identified as detailed in 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p> <ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period

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			<p>4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting.</p> <p>5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP.</p> <p>https://www.wsp.com/en-za/services/public-documents</p> <p>6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations:</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring</p>

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			<p>towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p> <p>Due to additional specialist studies conducted after the 30-day PPP period to address concerns raised by the I&APs, another 30-day PPP period will be conducted and Mrs Buthelezi and Mrs Van Wyk will be notified of this to further comment on the proposed project application.</p> <p>Prior to commencement of the additional 30-day PPP period, Mrs Buthelezi and Mrs Van Wyk were contacted via email to ensure awareness of the additional 30-day PPP period and that she is able to access to the documents electronically or provided with a hardcopy of the reports and documents to review.</p>
24.	I cannot raise my opinion due to lack of information or participation. Lack of information and transparency.	Johnaver Hendriks Registration and comments sheet 28 October 2024	<p>The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs were identified as detailed in 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p>

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			<ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period 4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting. 5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. https://www.wsp.com/en-za/services/public-documents 6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact

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			<p>Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations:</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p> <p>Due to additional specialist studies conducted after the 1st 30-day PPP period to address concerns raised by the I&APs, a 2nd 30-day PPP period will be conducted and all I&APs will be notified of this to further comment on the proposed project application.</p>
25.	No information received	Sunette Pitman Registration and comments sheet	The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment

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		28 October 2024	<p>during the 30-day PPP. Furthermore, stakeholders and I&APs were identified as detailed in 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p> <ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period 4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting. 5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. <p>https://www.wsp.com/en-za/services/public-documents</p>

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			<p>6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations:</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p> <p>Due to additional specialist studies conducted after the 30-day PPP period to address concerns raised by the I&APs, another 30-day PPP period will be conducted and all I&APs will be notified of this to further comment on the proposed project application.</p>

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26.	I request that public participation be redone Lack of information	Carmen Rodgers Registration and comments sheet 28 October 2024	<p>The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs were identified as detailed in Section 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p> <ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period (refer to Appendix) 4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting (refer to Appendix). 5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact

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			<p>Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP.</p> <p>https://www.wsp.com/en-za/services/public-documents</p> <p>6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations (refer to Appendix):</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p>

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			<p>Initiated as a results of comments by IA&Ps during the PPP:</p> <p>10. WSP and proponent conducted a Focus Group Meeting on Air Quality Impacts, introducing the findings of the updated assessment</p> <p>11. WSP and proponent conducted a Focus Group Meeting on Traffic Impacts, introducing findings of the Traffic Impact Assessment</p> <p>Due to additional specialist studies conducted after the 1st 30-day PPP period to address concerns raised by the I&APs, a 2nd 30-day PPP period will be conducted and all I&APs will be notified of this to further comment on the proposed project application.</p>
27.	<p>See attached comment.</p> <p><i>Attachment:</i> Based on the terrestrial biodiversity compliance statement the undeveloped and vegetated portion of the site contains secondary endangered Saldanha Flats Strandveld, with one confirmed botanical species of conservation concern, and the site likely to serve as forage and transitory area for certain faunal and avifaunal species as well as one potential invertebrate species of conservation concern. The terrestrial biodiversity specialist indicated that development of the vegetated area of the site would result in medium negative residual impact that would require the provision of a biodiversity offset. It is understood that the development layout has been amended to</p>	<p>Ismat Adams</p> <p>Land Use Scientist</p> <p>CapeNature</p> <p>Email, 29 October 2024</p>	<p>It is noted that CapeNature is in agreement with the findings of the terrestrial biodiversity compliance statement.</p>

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	<p>exclude the vegetated area and restrict proposed infrastructure to disturbed areas which has resulted in a low negative residual impact according to the terrestrial biodiversity specialist and would no longer require a biodiversity offset.</p> <p>It is agreed as per the terrestrial biodiversity compliance statement and addendum that the vegetated area of the site should be medium botanical sensitivity, and that the peripheral areas that will be utilised are in disturbed areas that can be developed with no biodiversity offset. The proposed development footprint aligns mostly with the SSOS “no offset required area”, and is of sufficiently low residual impact to not warrant biodiversity offset in the “offset-required” area.</p> <p>It is noted that no changes will be made to the entrance road off OP538. Such changes would be affecting the core corridor area of the SSOS.</p>		
28.	<p>At the community meeting it was noted there are several inaccuracies in their submission.</p> <p>They will not be able to adequately prevent the product from contaminating areas during its transport to and from the hub.</p> <p>The impact on the communities health is in question as well as the effect on surrounding fauna and flora.</p>	<p>Antonio Manuel</p> <p>Email, 29 October 2024</p>	<p>It was communicated at the public meeting that a traffic impact assessment and human health risk assessment/study was not conducted as these were not required based on the legal requirements and threshold/ volume of additional vehicles added to the traffic during peak traffic hours (additional 50 vehicles per hour) and the dispersion and dust fallout analysis conducted for the atmospheric impact assessment confirmed the residential emission concentration was within the limit standard.</p>

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	<p>Further precautions need to be taken.</p> <p>Further studies are needed.</p> <p>Further community involvement is needed.</p> <p>An independent watchdog appointed by the community is needed.</p> <p>Let's make this hub the best in the world and not another case study of what should have happened to prevent another environmental disaster.</p>		<p>However, in response to concerns raised at the public meeting, the proponent commissioned a traffic impact assessment and human health risk assessment to clearly define the anticipated impact on traffic health as a result of the proposed Logistics Hub. The inclusion of new information in the Basic Assessment Report requires that an additional 30-day disclosure period be conducted. As such, the results and findings from these studies are now included in the updated second BAR and this document will be made available for a period of 30-days for all registered IAPs to review and provide comment. All registered I&APs will be notified that the updated BAR, EMPr and all specialist studies will be available for review and comment.</p> <p>All specialist studies and consultants appointed by the proponent are registered independent professionals and have provided a signed declaration of independence.</p> <p>The WCDM and DEA&DP are designated with the function and role to assess the proposed project and determine whether the proposed mitigation measures are sufficient to minimise negative environmental impacts. During the construction and operation phase, it will be required for an independent auditor to monitor the implementation of the proposed mitigation measures and to submit audit reports to the Competent Authority for review. WCDM and DEA&DP case officers are able to visit the site at any time during the construction and operation phase, and determine compliance with the Environmental Authorisation (EA) and Atmospheric Emissions License (AEL). Should the site not be compliant, the proponent may be liable for a fine and the operations on site may be stopped until the site complies with the recommended EA and AEL conditions.</p>

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29.	Kindly find the attached comments for your attention Please confirm receipt of this email.	Sent by Michael Collins on behalf of Dr Joy Leaner Western Cape Government Email, 31 October 2024	Good day Michael Received, thank you
30.	<p>It is noted that the Facility submitted an application for the renewal of its AEL with reference number WC/WC/020, with respect to the following Listed Activities in terms of Section 21 of the NEM: AQA, as amended:</p> <ul style="list-style-type: none"> - Category 4: Metallurgical Industry, Subcategories 4.2; 4.6; 4.7; 4.11; and 4.12; - Category 5: Mineral Processing, Storage and Handling, Subcategories 5.1 and 5.2. <p>The Facility proposes a Logistics Hub for its bulk materials storage and handling area of the steelworks, for which a variation of the existing AEL is sought</p> <p>AIR</p> <p>Scenario 1 indicated that the PM₁₀ concentrations were predicted to exceed the National Ambient Air Quality Standard (NAAQS) beyond the Saldanha Steel fence line, with a maximum 24-hour average of 302 µg/m³ and a long-term average of 103 µg/m³, both occurring on the northern fence line and exceeding their</p>	<p>Dr. Joy Learner</p> <p>Director: Air Quality Management</p> <p>Western Cape Government</p> <p>Email, 31 October 2024</p>	<p>The AIR presented the atmospheric dispersion concentrations and dust fall out for all scenarios. Scenario 1 is the existing steel making operations that are under care and maintenance and that were authorised through the existing AEL. The Environmental Authorisation application for the Logistics Hub was presented as Scenario 2 in the AIR which is being applied for.</p> <p>Saldanha Steel conducted a public participation meeting on 15 October 2024. An outcome from this meeting was concerns raised regarding the exceedances predicted along the eastern fenceline of Saldanha Steel for the logistics hub (Scenario 2 as described in the AIR). These predicted exceedances were predominantly due to the unpaved entrance road to be used for the import of bulk commodities. To address these concerns, Saldanha Steel have amended the project description and are now proposing to pave a section of this entrance road, from the gate along the OP538 public road to the onsite weighbridge. The paved section of road will be 1.22km in length, aimed at reducing emissions associated with the entrance road, and therefore reducing potential dust impacts on the receiving environment.</p> <p>The AIR was updated to include a revised assessment of the Logistics Hub operations, unchanged as per the original AIR, with the only change associated with paving the entrance road.</p>

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	<p>respective NAAQS limits. The predicted maximum 24-hour average fence line concentration for PM_{2.5} and its annual average both measured on the northern fence line of Saldanha Steel exceeded their relevant NAAQS limits.</p> <p>Scenario 2 indicated that maximum 24-hour average concentration for PM₁₀ on the fence line was predicted to exceed the NAAQS at the northern fence line of Saldanha Steel.</p> <p>Scenario 3 indicates that both the maximum 24-hour average and the annual average concentrations for PM₁₀ are predicted to exceed the NAAQS at the fence line. The maximum concentrations 24-hour, and annual average concentrations for PM_{2.5} were also predicted to exceed their relevant NAAQS at the fence line.</p> <p>For facilities of this nature, the following requirements must be adhered to:</p> <p>Best practice measures to minimize potential air pollutants on-site must be implemented to reduce emissions to the surrounding environment.</p> <p>Compliance with all NAAQS and Minimum Emission Standards (MES) for Section 21 Listed Activities that are applicable must be ensured at all times.</p>		<p>With the paving of the road, full compliance of the NAAQS and National Dust Control standards is predicted for PM₁₀ and PM_{2.5}, and dust fallout, respectively.</p> <p>A fugitive emissions and dust management plan was developed for all scenario's proposed in the AIR to manage and mitigate emissions and dust generation. The mitigation measures include best practice measures to reduce dust emissions to the surrounding environment.</p> <p>Through the engineering, operation and administrative controls the aim is to comply with the NAAQS and Minimum Emission Standards (MES) for Section 21 Listed Activities and the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.</p> <p>Noise mitigation measures were included in the EMPr to manage noise generating activities on site and that task specific PPE is provided for staff exposed to noise generating activities during the construction and operation phase.</p>

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	<p>Dust management</p> <p>It is noted that dust may be generated during the from vehicles and equipment traversing the project site, and from loading and offloading of commodities during the construction and operational phases.</p> <p>Dust generated from all the activities of the development must comply with the NEM: AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013 (“the Regulations”).</p> <p>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>The Directorate notes the exceedances of the residential standard at the following dust monitoring sites: SBM-01 (July 2017); SBM-02 (December 2019); SBM-03 (March 2018); SBM-04 (February 2020) and SBM-07 (July 2018 and March 2019).</p> <p>It is further noted that there were exceedances of the non-residential standard reported at the following sites: AM_SE (January 2017); AM_NW (May 2017); AM_S (February 2019); AM_SW (April 2017 and September 2018) and AM_W</p>		

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	<p>(September 2018 and April 2019) and AM_NE (February, November and December 2020).</p> <p>The applicant is to engage with the Licensing Authority, West Coast District Municipality (WCDM), regarding:</p> <ul style="list-style-type: none"> i. the investigation and application of best practice measures intended to minimise potential air pollutants on site to reduce dust emissions to the surrounding environment; ii. measures to monitor and prevent fugitive dust emissions as stipulated in Section 26 of the BAR and Section 10 of the AIR, as well as in a Dust Management Plan, for addition to the Environmental Management Programme (EMPr). <p>Noise management</p> <p>Noise generated from the construction and operational activities of the facility may give rise to noise levels exceeding the allowable limit. In terms of noise management, the facility must comply with the Western Cape Noise Control Regulations (P.N. 200/2013).</p> <p>Mitigation measures be implemented strictly during all phases of the proposed activities as stipulated in Section 26 of the BAR</p>		

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	<p>Overall comments</p> <p>The Directorate submits the following comments, noting that the final decision regarding the AEL application resides with the Licensing Authority, WCDM.</p> <p>The exceedances noted in terms of the dust fallout standards of the Regulations, as well as the predicted exceedances of PM_{2.5} and PM₁₀, along with the potential impacts on the receiving environment are deemed unacceptable.</p> <p>Consequently, the Directorate does not support the AEL Application without the implementation of appropriate mitigation measures at the Facility, to ensure compliance with the NAAQS and dust fallout standards. The applicant is advised to address this matter with the Licensing Authority.</p> <p>General</p> <p>Please note that West Coast District Municipality is the Licensing Authority in terms of the Atmospheric Emissions License Application, and as such to provide the final comment and/or decision to the application of the AEL.</p> <p>The Department 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</p>		

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	<p>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>Please note that the above-mentioned comments/recommendations do not pre-empt the outcome of the application.</p> <p>No information provided, views expressed and/or comments made by the DEA&DP, D: AQM should in any way be seen as an indication or confirmation:</p> <p>1.that additional information or documents will not be requested; or</p> <p>2. of the outcome of any application submitted to the authorities.</p>		
31.	Lack of public participation.	<p>Quinton March</p> <p>Registration and comments sheet</p> <p>28 October 2024</p> <p>Latticia Perzens</p> <p>Registration and comments sheet</p>	<p>The public participation process followed to date has met the requirements of the EIA Regulations. The following tasks were conducted, those items underlined are tasks that go beyond the statutory requirements:</p> <ul style="list-style-type: none"> • Site Notices were placed;

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		<p>28 October 2024</p> <p>Jualita Blooms</p> <p>Registration and comments sheet</p> <p>28 October 2024</p> <p>Christina Jaers</p> <p>Registration and comments sheet</p> <p>28 October 2024</p> <p>Anthea Saffodien</p> <p>Registration and comments sheet</p> <p>28 October 2024</p> <p>Rafaat Saffodien</p> <p>Registration and comments sheet</p> <p>28 October 2024</p> <p>Roberts Rodgers</p> <p>Registration and comments sheet</p> <p>28 October 2024</p> <p>Rashied Williamson</p> <p>Registration and comments sheet</p> <p>28 October 2024</p>	<ul style="list-style-type: none"> • Press Advertisements in the Weslander and Die Burger were placed; • The First Draft of the BAR was released for a 30-day public comment period; • A public meeting was held during the 30-day consultation period; • Comments have been received and are captured and responded to within this document; • Further specialist studies were commissioned in response to the comments received on the first draft BAR; • A focus group meeting on transport impacts and a focus group meeting on air quality and human health was conducted; • The Second Draft of the BAR was released for a 2nd 30-day public comment period. <p>Due to additional specialist studies conducted after the 30-day PPP period to address concerns raised by the I&APs, a 2nd 30-day PPP period will be conducted and all I&APs will be notified of this to further comment on the proposed project application.</p>
32.	I am writing to express my dissatisfaction with the lack of adequate communication regarding the Logistics Hub project.	<p>Hoosain Padayachee</p> <p>Chairman- BEST FORUM</p>	<p>The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs</p>

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	<p>Many community members, including myself, were unaware of its scope and potential impact due to insufficient advertising and outreach efforts. The absence of comprehensive public participation has left us feeling excluded from a decision that will affect our lives and environment. This oversight not only undermines community trust but also highlights a gap in the commitment to transparency and collaboration. It is crucial that projects of this magnitude involve the voices and concerns of those they will impact.</p> <p>I urge WSP to prioritise effective communication strategies in the future to ensure that all stakeholders are informed and engaged. The community deserves a platform to express their opinions and contribute to discussions that shape our shared future.</p> <p>A more inclusive approach would not only foster community trust but also lead to a better outcome for everyone involved.</p> <p>I request you to consider facilitating this additional engagement as soon as possible.</p>	Email, 28 October 2024	<p>were identified as detailed in Section 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p> <ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period (refer to Appendix) 4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting (refer to Appendix). 5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. <p>https://www.wsp.com/en-za/services/public-documents</p>

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			<p>6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations (refer to Appendix):</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p> <p>Initiated as a results of comments by IA&Ps during the PPP:</p>

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			<p>10. WSP and proponent conducted a Focus Group Meeting on Air Quality Impacts, introducing the findings of the updated assessment</p> <p>11. WSP and proponent conducted a Focus Group Meeting on Traffic Impacts, introducing findings of the Traffic Impact Assessment</p> <p>Due to additional specialist studies conducted after the 30-day PPP period to address concerns raised by the I&APs, another 30-day PPP period will be conducted and Mr Padayachee will be notified of this to further comment on the proposed project application.</p>
33.	No information and public engagement	<p>Brydon Rodgers</p> <p>Registration and comments sheet</p> <p>28 October 2024</p>	<p>The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs were identified as detailed in Section 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p> <ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas

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			<p>informing the public of the project and the 30-day public review and commenting period (refer to Appendix)</p> <p>4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting (refer to Appendix).</p> <p>5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP.</p> <p>https://www.wsp.com/en-za/services/public-documents</p> <p>6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations (refer to Appendix):</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library

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			<p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p> <p>Initiated as a results of comments by IA&Ps during the PPP:</p> <p>10. WSP and proponent conducted a Focus Group Meeting on Air Quality Impacts, introducing the findings of the updated assessment</p> <p>11. WSP and proponent conducted a Focus Group Meeting on Traffic Impacts, introducing findings of the Traffic Impact Assessment</p> <p>Due to additional specialist studies conducted after the 1st 30-day PPP period to address concerns raised by the I&APs, a 2nd 30-day PPP period will be conducted and all I&APs will be notified of this to further comment on the proposed project application.</p>
34.	Advertising only one platform is insufficient. Involvement of local councillors and previously disadvantaged communities not considered and	Lucky Bopape Local Secretary COSATU	The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs

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	<p>no public meetings in those where majority of people reside.</p> <p>The issue of public participation must be inclusive. Opportunities should focus on previously disadvantaged communities. Transport should be provided to all wards and community representatives and stakeholders. Presentation by officials to local structures on opportunities and threats of the project should be presented.</p>	Email, 28 October 2024	<p>were identified as detailed in Section 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p> <ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period (refer to Appendix) 4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting (refer to Appendix). 5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. <p>https://www.wsp.com/en-za/services/public-documents</p>

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			<p>6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations (refer to Appendix):</p> <ul style="list-style-type: none"> a. Saldanha Public Library b. Langebaan Public Library c. Vredenburg Public Library d. Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <p>8. Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others.</p> <p>9. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpuisbos Information Group, Sunbird Drive Watch Group, and others.</p> <p>Initiated as a results of comments by IA&Ps during the PPP:</p>

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			<p>10. WSP and proponent conducted a Focus Group Meeting on Air Quality Impacts, introducing the findings of the updated assessment</p> <p>11. WSP and proponent conducted a Focus Group Meeting on Traffic Impacts, introducing findings of the Traffic Impact Assessment</p> <p>During the Basic Assessment Process community and organisation representatives were informed electronically and consulted to raise concerns experienced by the affected communities. These include the Saldanha Bay Local Municipality, Ward Councillors from Ward 1 – 14 within the Saldanha Bay Municipality, the West Coast District Municipality, all organs of State identified by DEA&DP, and organisations within the Saldanha Bay municipal area during the first round of PPP. Through the I&AP and public engagement process we have received several concerns that represent the concerns of the public and affected communities.</p> <p>Due to additional specialist studies conducted after the 30-day PPP period to address concerns raised by the I&APs, another 30-day PPP period will be conducted and Mr Bopape will be notified of this to further comment on the proposed project application.</p>
35.	<p>Ore to be treated with the correct Chemical Dust Suppression at source prior to rail and road transport to Saldanha.</p> <p>All road transport contractors used are to be instructed to use the following route to Saldanha: N7 to Mooreesberg, R311 from Mooreesberg to Hopefield , R45 from Hopefield</p>	<p>Andre A. Dart</p> <p>Member of RDAG</p> <p>Email, 28 October 2024</p>	<p>AMSA will endeavour to engage with suppliers and transporters of commodities to minimise dust generation of manganese from rail wagons and road transport with dust mitigation measures. As a purchaser and handler of commodities, AMSA will however not be able to enforce or monitor mitigation measures on suppliers and transporters of the commodities.</p>

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	<p>to Langebaanweg and then new dedicated road to harbour at Saldanha.</p> <p>Concerns</p> <p>Old Saldanha Steel Tipler:</p> <p>a) The baghouse servicing the Tipler needs to be overhauled before being used, i.e. new bags to be installed; pulse air drying system to be serviced; hopper outlet valves to be serviced to ensure they seal; dirty air section to be made air-tight; pulse air duration and frequency to be set correctly; ducting air velocity to measure- main duct air velocity to be no lower than 1,6 m/s; all branch pipes air velocity also to be set at no lower than 16 m/s.</p> <p>b) All dust extraction take-offs to be verified against the " Industrial Ventilation Manual".</p> <p>Transfer Station 1:</p> <p>Same as for points (a) and (b) above</p> <p>New conveyor:</p> <p>Recommend tube type conveyor is used to limit environmental pollution.</p> <p>New warehouse</p>		<p>The route proposed by Mr Dart is considered as one of the two alternative road routes to transport the commodities. The route from the N7 along the R399 to Velddrif and then along the R27 to Saldanha and the site is proposed. Both routes were assessed in the traffic impact assessment and provided as a specialist study during the 2nd PPP conducted.</p> <p>The design and operation concerns are noted and will be implemented prior to operation of the logistics hub. Maintenance of the tippler, baghouse, conventional conveyer, transfer station and warehouse as per the supplier specifications are included in the FDMP and the EMP that must be implemented should the activity be authorised.</p> <p>The ship loading is controlled by Transnet Port Terminals and operators at the Port. AMSA will endeavour to ensure that dust emissions are minimised during ship loading through engagement with TNPA. New loading technologies and operations for commodities onto ships are considered and will be introduced for the logistics hub.</p>

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	<p>Dust extraction system is to be designed using the Industrial Ventilation Manual as a guide to ensure that all areas are serviced, i.e. Truck off-loading station; all doors; bin loading station; new conveyor discharge station and at each product storage area.</p> <p>Ship loading:</p> <p>Portable Dust extraction system to be put in place around ship hold while product is being loaded.</p>		
36.	<p>I can't print the form to return to you. please add me to your e mail list.</p> <p>We are very concerned about the red dust as it hasn't got any better.... My house is still full of it and needs maintenance all the time due to the red dust</p>	<p>Lesly Ford</p> <p>Email, 28 October 2024</p>	<p>The logistics hub is not proposing to handle iron ore which is the contributor of the red dust in the Saldanha Bay area.</p> <p>This additional assessment was conducted to assess the Logistics Hub operations, unchanged as per the original AIR, with the only change associated with paving the entrance road.</p> <p>With the paving of the road, full compliance of the NAAQS and National Dust Control standards is predicted for PM₁₀ and PM_{2.5}, and dust fallout, respectively.</p> <p>A fugitive emissions and dust management plan was developed for all scenario's proposed in the Atmospheric Impact Assessment Report to manage and mitigate emissions and dust generation. The mitigation measures include best practice measures to reduce dust emissions to the surrounding environment.</p> <p>Through the engineering, operation and administrative controls the aim is to comply with the NAAQS and Minimum Emission Standards (MES) for Section 21 Listed Activities and the NEM:</p>

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			AQA, National Dust Control Regulations (Government Notice No. R. 827) of 1 November 2013.
37.	<p>It came under my attention under your public participation that people are fronting that they represent the Cochoqua tribe and the West Coast community. I reject there participation and request that the public participation are being done correctly for our local communities & businesses forums have a fair understanding of this project. The lack of your media team is very concerning. Not everyone uses FB or buy the local Newspaper. We request that you hold another public participation and that the previous one be rejected.</p> <p>Please see attached for your attention. I am the recognized appointed Tribal Authority as Senior Chief of the West Coast. Those people who claim to speak on behalf of the Aikonese Cochoqua tribe has been removed from all structures and do not speak for the tribe. We would like to have a respectful relationship with all stakeholders and be transparent to the recognized tribe, community and all business forums who is part of this community on the West Coast.</p> <p>Indigenous interests and Tribal Control in the West Coast area of the Western Cape between Cape Town and Elands Bay are controlled and coordinated by the Cochoqua Kingdom Royal Council. Aforementioned indigenous structure is based in Mamre and resorts under a Khoikhoi</p>	<p>Carmen Rodgers Paramount Chief Aikonese Cochoqua Tribe Email 28 October 2024</p>	<p>A Notice of Intent to Develop (NID) form was submitted to HWC for this project on 20 March 2023. HWC responded in a letter dated 10 May 2023 indicating that a Heritage Impact Assessment (HIA) is required that satisfies the requirements of section 38(3) of the NHRA. This assessment must include an Archaeological Impact Assessment and a study of the significance of historical use of the site by the First Nation Group. HWC indicated that the Aikonese Cochoqua Tribal Council is consulted as part of the HIA. Furthermore, <u>HWC provided the contact details of the representative of the Aikonese Cochoqua Tribal Council that should be consulted.</u></p> <p>A HIA was conducted for the proposed site of the Logistics Hub warehouse which included an archaeological, palaeontological and cultural assessment. Furthermore, an extensive consultation process was undertaken in order to determine the significance of historical use of the site. Focus Group Meeting was held with the Chief and leadership of the Aikonese Cochoqua Tribal Council representatives and this is documented in the Stakeholder Engagement Comments Report in Appendix 5 of the HIA report (CTS Heritage, 2024). The methodology, process of engagement, detailed findings and results of the HIA, impact assessment and mitigation measures are presented in the specialist HIA report. Without mitigation the significance of the impact is Low to Medium Negative and with mitigation is Low to Medium Positive due to the possible fossil bone content exposed during earthworks on site.</p> <p>The National Heritage Resources Act (NHRA) includes a process by which communities can register an interest in heritage resources in an area. These communities are then</p>

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	<p>Royal Family Structure. The royal structure exercises the sole prerogative to appoint all levels of leadership within its Kingdom structures.</p> <p>The whole Saldanha Municipal area and a portion of the Bergrivier municipal area falls within the demarcation of the Aikonese Subtribe of the Cochoqua Kingdom.</p> <p>As a result of an internal leadership challenge within the West Coast the Kingdom Royal Council took the decision to appoint Senior Chief Carmen Genean Rodgers as interim paramount (overall) leader for the Aikonese Cochoqua Sub-tribe of the West Coast . Her appointment is with effect of 10 August 2024. All other offices are requested to respect the decision of the Royal council and to assist leader Carmen Rodgers to fulfil her roles and responsibilities as be-stowed upon her in respect of our Khoikhoi customs.</p>		<p>formally recognised as Conservation Bodies and registered with HWC. Registration as a Conservation Body means that the community must be provided with 30 days in which to comment on any applications made in terms of the NHRA within their area of interest.</p> <p>A list of registered conservation bodies is available at the HWC website here: https://hwc.org.za/conservation-bodies</p> <p>Information on how to register as a conservation body is available here: https://hwc.org.za/node/1622</p> <p>At present, the only registered Conservation Body for the area under consideration for this project is the Aikonese Cochoqua Khoi Tribal Council with Paramount Chief Kevin Maart listed as the contact person for the Tribal Council. As such, and as per HWC instructions, this was the organisation and representative that was engaged with.</p> <p>As additional specialist studies were conducted after the 30-day PPP period to address concerns raised by the I&APs, another 30-day PPP period will be conducted.</p> <p>Ms Carmen Rodgers was registered as an I&AP and all I&APs will be informed via email and SMS at the start of the additional 30-day PPP period to review and provide comments on the proposed project and EA application.</p>
38.	<p>This is to inform you that we as the WCAMC West Coast Aboriginal Maritime Cluster, based in Saldanha Bay, in collaboration with Xhorro people's perspective from Vredenburg, is objecting against the environmental assessment public participation meeting that was held in Saldanha on Tuesday 15th October at AMSA Saldanha Steel Facility for the presentation by the environmental Practitioners where there was</p>	<p>Iona Grosch</p> <p>Executive Director</p> <p>Xhorro People's Perspective</p> <p>Email, 28 October 2024</p>	<p>The public participation guideline in terms of the EIA Regulations, 2014 were followed to make project information and documents available for public review and comment during the 30-day PPP. Furthermore, stakeholders and I&APs were identified as detailed in Section 2.1.1. Activities conducted at the start of the 30-day PPP included:</p> <p>Directly initiated by WSP:</p>

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	<p>no involvement by the local community of the adjacent site AMSA.</p> <p>Firstly, the local community is underprivileged and does not have access to social media platforms, other than WhatsApp, or the newspapers in which you have advertised for public participation. Therefore, a lack of proper communication through the local chiefs of the adjacent area were underutilised.</p> <p>Secondly, the local community does not have any transport that was made available to access the site that was at AMSA for the presentation that was held on Tuesday 15th October 2024 nor was the local Chiefs involved to make proper arrangements for the community members to be transported for participation.</p> <p>Thirdly, the local community is part of the local Cochoqua Kingdom of the West Coast and of which was not consulted nor informed of the developments in the area for their positive participation regarding economic development and biodiversity of such a magnitude operation.</p> <p>It has also come under our attention that the people mentioned in your Heritage impact assessment, stakeholder comments are imposters that are named in your documents.</p> <p>Should you need more clarification in this regard you may contact Carmen Rodgers who is the Senior Chief of the Aikonese Cochoqua Tribe for</p>		<ol style="list-style-type: none"> 1. Send emails to all stakeholders and I&APs included and registered on the project database (where email addresses were provided) informing them of the project and the 30-day public review and commenting period 2. Send SMS to all stakeholders and I&APs included and registered on the project database (where cell phone numbers were provided) informing them of the project and the 30-day public review and commenting period 3. Place site notices around the site and at conspicuous places around the site and nearest residential areas informing the public of the project and the 30-day public review and commenting period (refer to Appendix) 4. Placed an advert in Die Weslander (English) and Die Burger (Afrikaans) to notify the public of the project, to register as I&APs on the project database, where to source the reports and documents (electronic and hardcopies) and informing the public of the public meeting (refer to Appendix). 5. Make the reports and documents available electronically for review on the following website – these include the Basic Assessment Report (BAR), Environmental Management Programme (EMPr) and all Specialist Studies conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. https://www.wsp.com/en-za/services/public-documents 6. Make hard copies of all the reports and documents available at the following locations for review – these include the BAR, EMPr and all Specialist Studies

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	<p>further verification from the Cochoqua Royal House in which she is copied hereto.</p> <p>Based on all the above, we therefore request to re-institute the public participation in an area where the local community can participate through proper communication by the various chiefs instead of a remote area where the people do not have any means for transport to attend, engage and endorse this assessment.</p> <p>Please do not hesitate to contact us by reply mail should you need any clarification in this regard.</p>		<p>conducted to inform the Environmental Impact Assessment and Impact Significance based on the Impact Assessment Criteria and Scoring System also used by DEADP. The hard copies were placed at the following locations (refer to Appendix):</p> <ol style="list-style-type: none"> Saldanha Public Library Langebaan Public Library Vredenburg Public Library Laingville Public Library <p>7. Conduct a public meeting at the AMSA Saldanha Steel Facility as this was a central location to the 4 neighbouring towns to the Facility: Saldanha, Langebaan, Vredenburg and St Helena Bay/Velddrif.</p> <p>Indirectly initiated by IA&Ps:</p> <ol style="list-style-type: none"> Made available on Facebook group, e.g. Red Dust Action Group Facebook and Langebaan News and Info pages, and others. Made available on WhatsApp community groups, e.g. Langebaan SBM Councillor Group, Sunbird/Park/Harpusbos Information Group, Sunbird Drive Watch Group, and others. <p>Initiated as a results of comments by IA&Ps during the PPP:</p> <ol style="list-style-type: none"> WSP and proponent conducted a Focus Group Meeting on Air Quality Impacts, introducing the findings of the updated assessment

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			<p>11. WSP and proponent conducted a Focus Group Meeting on Traffic Impacts, introducing findings of the Traffic Impact Assessment</p> <p>During the Basic Assessment Process community and organisation representatives were informed via email and consulted to raise concerns experienced by the affected communities. These include the Saldanha Bay Local Municipality, Ward Councillors from Ward 1 – 14 within the Saldanha Bay Municipality, the West Coast District Municipality, all organs of State identified by DEA&DP, and organisations within the Saldanha Bay municipal area during the first round of PPP. Through the I&AP and public engagement process we have received several concerns that represent the concerns of the public and affected communities.</p> <p>Due to additional specialist studies conducted after the 1st 30-day PPP period to address concerns raised by the I&APs, a 2nd 30-day PPP period will be conducted and all I&APs will be notified of this to further comment on the proposed project application.</p> <p>A Notice of Intent to Develop (NID) form was submitted to HWC for this project on 20 March 2023. HWC responded in a letter dated 10 May 2023 indicating that a Heritage Impact Assessment (HIA) is required that satisfies the requirements of section 38(3) of the NHRA. This assessment must include an Archaeological Impact Assessment and a study of the significance of historical use of the site by the First Nation Group. HWC indicated that the Aikonese Cochoqua Tribal Council is consulted as part of the HIA. Furthermore, <u>HWC provided the contact details of the representative of the Aikonese Cochoqua Tribal Council that should be consulted.</u></p>

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			<p>A HIA was conducted for the proposed site of the Logistics Hub warehouse which included an archaeological, palaeontological and cultural assessment. Furthermore, an extensive consultation process was undertaken in order to determine the significance of historical use of the site. Focus Group Meeting was held with the Chief and leadership of the Aikonese Cochoqua Tribal Council representatives and this is documented in the Stakeholder Engagement Comments Report in Appendix 5 of the HIA report (CTS Heritage, 2024). The methodology, process of engagement, detailed findings and results of the HIA, impact assessment and mitigation measures are presented in the specialist HIA report. Without mitigation the significance of the impact is Low to Medium Negative and with mitigation is Low to Medium Positive due to the possible fossil bone content exposed during earthworks on site.</p> <p>The National Heritage Resources Act (NHRA) includes a process by which communities can register an interest in heritage resources in an area. These communities are then formally recognised as Conservation Bodies and registered with HWC. Registration as a Conservation Body means that the community must be provided with 30 days in which to comment on any applications made in terms of the NHRA within their area of interest.</p> <p>A list of registered conservation bodies is available at the HWC website here: https://hwc.org.za/conservation-bodies</p> <p>Information on how to register as a conservation body is available here: https://hwc.org.za/node/1622</p> <p>At present, the only registered Conservation Body for the area under consideration for this project is the Aikonese Cochoqua Khoi Tribal Council with Paramount Chief Kevin Maart listed as</p>

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			<p>the contact person for the Tribal Council. As such, and as per HWC instructions, this was the organisation and representative that was engaged with.</p> <p>Due to additional specialist studies conducted after the 1st 30-day PPP period to address concerns raised by the I&APs, a 2nd 30-day PPP period will be conducted and all I&APs (including Mrs Rodgers) will be notified of this to further comment on the proposed project application.</p>
39.	<p>Dear Sir/Madam,</p> <p>The Directorate acknowledges the receipt of your correspondence.</p> <p>Kind Regards</p>	<p>DEADP EIA Admin</p> <p>Email, 29 October 2024</p>	The Directorate's comment was noted.
40.	I fully support this proposed project	<p>Frederick De Villiers</p> <p>Response and comments sheet</p> <p>29 October 2024</p>	Mr De Villiers comment was noted.
41.	<p>If this project goes ahead to add another 5 million tons of red dust into the environment you will be over the 8 million capacity levels as there are 4 million tons already.</p> <p>Using a biased assessment company - advised to utilise an unbiased assessment company via Stellenbosch University as advised in the meeting.</p>	<p>Tracy Rob & Mrs T Mistry</p> <p>Email</p> <p>29 October</p>	Standard practice in all environmental impact assessments is for most, if not all specialist studies to be conducted by specialist environmental consulting companies that are independently registered with the Environmental Assessment Practitioners Association for South Africa (EAPASA), or similar for key expert specialists (SACNASP). These consultants are not biased and are independent specialists in their field of expertise. A declaration of independence has been signed by the specialists involved in the impact assessment process and included in the Draft BAR Appendix.

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	Regular health checks should be made in the surrounding area to monitor the impact.		<p>An independent service provider/consultant is used to conduct the dispersion modelling, monitoring and external audits during the construction and operation phase.</p> <p>Regular health checks of staff employed at the logistics hub is included in the EMPr and will be implemented. Community health impacts are not anticipated as a result of the Logistics Hub Operations as no emissions beyond the fence boundary are anticipated.</p> <p>Dust fallout monitoring will be conducted onsite with eight (8) monitoring points surrounding the site to monitor dust fallout from onsite activities. Should exceedances be recorded in the dust fallout monitoring it will induce health checks of individuals in the surrounding area.</p>
42.	<p>Due to the major dust footprint in the area, we would like to see under roof storage of incoming product</p> <p>Dust footprint the major concern</p>	<p>F.C. van Wyk</p> <p>Response and comments sheet</p> <p>28 October 2024</p>	<p>It is confirmed that the proposed logistics hub includes the development of a warehouse large enough to store all the commodities proposed for storage and export at the Logistics Hub. All handling of the commodities will take place inside the warehouse.</p> <p>With the warehouse and proposed paving of the gravel entrance road to the logistics hub, full compliance of the NAAQS and National Dust Control standards is predicted for PM₁₀ and PM_{2.5}, and dust fallout, respectively.</p> <p>A fugitive emissions and dust management plan was developed to manage and mitigate emissions and dust generation anticipated for the logistics hub. The mitigation measures include best practice measures to reduce dust emissions to the surrounding environment.</p>

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43.	<p>As discussed with Brian, please may we have a further extension. We have discovered further documents relating to the project which are well over 70 pages that need assessment from our specialist team.</p> <p>We simply cannot get through all this information in the time we have.</p>	<p>Kyle John Dods Member – Red Dust Action Group Email 07 November 2024</p>	<p>The extension was granted for I&APs to provide their comments on or before the 12th of November 2024.</p>
44.	<p>The Red Dust Action Group (RDAG) recognizes the importance of economic growth and job creation for the local community in Saldanha. We acknowledge the potential for such a facility to contribute to the economic development of the region, especially given the economic hardships currently faced by local households. However, our primary concern is the protection of the environment and the health of local residents. While we are open to the development of the logistics hub, we emphasize that our support is contingent upon the incorporation of best practice methods to minimize environmental impacts and ensure the long-term sustainability of the community. We are particularly concerned with the current handling of hazardous ore materials and the cumulative effects that could arise from further industrialization in an already highly industrialized area. However, we do see this proposed facility as an opportunity to set a new standard in environmental and safety practices,</p>	<p>Kyle John Dods Member – Red Dust Action Group Email 22 November 2024</p>	<p>The extension was granted for I&APs to provide their comments on or before the 12th of November 2024. It should be noted that these comments were received after this date on the 22 November 2024 and have been included in the consultation process.</p> <p>Saldanha Steel conducted a public participation meeting on 15 October 2024 at which it is noted the RDAG was represented. An outcome from this meeting was concerns raised regarding the exceedances predicted along the eastern fenceline of Saldanha Steel for the logistics hub (Scenario 2 as described in the AIR). These predicted exceedances were predominantly due to the unpaved entrance road to be used for the import of bulk commodities by truck. To address these concerns, Saldanha Steel are proposing to pave a section of this entrance road, from the gate along the OP538 public road to the onsite weighbridge. The paved section of road will be 1.22km in length, aimed at reducing emissions associated with the entrance road, and therefore reducing potential impacts on the receiving environment.</p> <p>An additional assessment was conducted to assess the Logistics Hub operations, unchanged as per the original AIR,</p>

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	<p>thereby potentially turning it into a model for others to follow.</p> <p>Failure to address the issues raised in this submission, and to adopt the proposals we recommend, will result in the RDAG, which represents a significant portion of the local community, rejecting the application. By contrast, a collaborative approach that incorporates our concerns will allow us to endorse the project as an example of best practice</p> <p>1. APPLICANT STATEMENTS: ECONOMIC GROWTH MOTIVATION</p> <p>The applicant argues that the economic justification for the proposed Logistics Hub, as detailed in the Basic Assessment Report (BAR) and Economic Impact Assessment, includes the following points:</p> <p>1.1. Economic Spin-offs: The primary motivation for the Logistics Hub is to generate economic spinoffs from the facility.</p> <p>1.2. Job Creation and Financial Investment: The applicant outlines job creation prospects, the financial injection from both the construction phase (Capex) and operational phase (Opex) of the facility.</p> <p>1.3. Local and National GDP Growth: Economic projections suggest that the facility</p>		<p>with the only change associated with paving the entrance road.</p> <p>With the paving of the road, full compliance of the NAAQS and National Dust Control standards is predicted for PM₁₀ and PM_{2.5}, and dust fallout, respectively.</p> <p>A fugitive emissions and dust management plan was developed for all scenario's proposed in the Atmospheric Impact Assessment Report to manage and mitigate emissions and dust generation. The mitigation measures include best practice measures to reduce dust emissions to the surrounding environment.</p> <p>Several of the specialist studies, and the additional traffic impact assessment, and human health risk impact assessment address the concerns raised by the RDAG that will be made available for public review for the 2nd 30-day PPP.</p> <p>Furthermore, a Focus Group Meeting (FGM) was held with key AQ stakeholders, it is again noted that RDAG was present. The FGM discussed the update of the atmospheric dispersion model, anticipated dust fallout rates, EMPr as well as the results of the human health risk assessment. During this FGM, several comments included in the letter submitted on 22 November 2024 were addressed. A summary of this FGM is provided in point 6, Section F, of the BAR. The key aspects discussed include:</p> <ol style="list-style-type: none"> Results from the updated air quality and dispersion model Assessment of the impact on areas surrounding the Saldanha Steel site and residential areas with the HHRA

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	<p>will contribute to both local and national GDP growth.</p> <p>1.4. Poverty Alleviation: The applicant highlights the low-income levels in the local community, presenting the facility as a potential source of income generation and poverty alleviation in the region.</p> <p>1.5. AMSA's Recovery Strategy: The applicant also mentions that the establishment of the facility is part of AMSA's effort to recover some revenue from its previously closed Saldanha Steel Facility (closed in 2020).</p> <p>1.6. Manganese Ore Demand: The applicant highlights the significant volume of manganese ore available in South Africa and the growing international demand for this commodity, suggesting continued export growth.</p> <p>1.7. Role in Steel Production: The importance of manganese in steel production is also cited as a justification for the new facility.</p> <p>1.8. Economic Impact Projections: The applicant presents a projected economic contribution of R92 million to the GDP as a result of the ore storage and handling facility, emphasizing the positive impact on economic growth.</p>		<p>3. Mitigation measures to minimise dust and emissions and the inclusion of these in the FDMP and the EMPr, and how these will be assessed during compliance audits. A key aspect of the mitigation measure included in the FDMP and EMPr, was that should any of the dust mitigation not be implemented, dust generating activities should be halted until these measures are implemented, repaired, or reinstated.</p> <p>4. The warehouse final design will ensure that it is air tight and does not allow dust to escape from the warehouse. Offloading and loading operations will also ensure dust does not escape the warehouse.</p> <p>5. Dust management measures and monitoring on the haul road between the Saldanha Steel site and the TPT was included in the FDMP and EMPr.</p> <p>6. Results from the traffic impact assessment. The intersection capacity analysis conducted for the OP07644/Site access intersection (i.e. at the existing truck access point), indicates the intersection operates at free flow across all approaches for all analysed scenarios "with" and "without" development traffic included. The analysis indicates that the development traffic will have an insignificant impact on the surrounding road network. Therefore, with less than 50 peak hour trips anticipated to be generated by the site during operations, the proposed development will not add any significant traffic to the surrounding road network.</p> <p>7. Independence of all specialist studies conducted through the EA process and application, and specialist to be appointed during the construction and operation phase to</p>

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	<p>2. RDAG - AEL PORTFOLIO COMMENTS: ECONOMIC GROWTH MOTIVATION</p> <p>2.1. Financial Impact of Manganese Storage and Handling in Saldanha: Considering the existing financial hardship and unemployment in the region, where over 4 Mtpa of manganese ore is already handled by licensed operators, the storage and handling of the same 4 Mtpa of manganese ore by AMSA at a different location is unlikely to make any significant financial impact.</p> <p>2.2. Bottleneck for Export Volumes: The bottleneck for manganese ore exports is capped by the Transnet Port Terminals (TPT) Air Emissions License (AEL) for the Multi-Purpose Terminal (MPT) Quay 203-204.</p> <p>2.3. Export Volume Constraints and Environmental Challenges: Export ore volumes cannot be increased without amending the MPT AEL, which poses an environmental challenge in meeting air quality regulations.</p> <p>2.4. Historic Export Growth and Financial Relief: The historic growth of ore exports in Saldanha (from 0 Mtpa to 4.3 Mtpa of manganese) has not resulted in any financial relief or improved local economic conditions, contrary to projections in the application documentation.</p>		<p>conduct audits and onsite monitoring are independent. All specialists are required to disclose all information assessed and the results thereof to the competent authority. The results from all studies conducted are submitted to the competent authority for review.</p> <p>2.1. As per Section Six - The construction of the proposed development is expected to generate approximately R629.7 million in new business sales, comprising R260.1 million in direct and R218.2 million in indirect effects. This activity is projected to add R241.0 million to gross value added nationally and create around 626 employment opportunities, increasing household incomes by R111.0 million.</p> <p>During the operational phase, the development is projected to generate R394.9 million in new business sales annually, with R179.8 million from direct impacts and R118.8 million from indirect impacts. This is expected to contribute R160.8 million to GDP per year, support 391 jobs, and increase household incomes by R76.3 million annually.</p> <p>The above highlights economic growth and employment creation during both the construction and operation of the proposed development.</p> <p>2.4. Noted. While historic growth in manganese exports through Saldanha has not yielded the anticipated local economic benefits, this highlights the need for a more integrated and inclusive development approach. The proposed development seeks to address this by improving local infrastructure, enabling more efficient handling of exports, and ensuring that economic gains are better aligned with local economic development objectives.</p>

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	<p>2.5. Economic Indicators and Projected Margins: Since the increase in manganese ore exports to Saldanha, economic indicators have not improved by the margins projected in the application.</p> <p>2.6. Potential Economic Impact of New Manganese Handling Operations: Doing the same volume of manganese ore storage and handling, even from a different location, may not deliver any economic improvement in the region.</p> <p>2.7. Impact on Existing Operators: Existing operators who have invested in similar facilities may suffer ore volume allocations, potentially leading to facility closures and job losses, which would not contribute to economic growth in the sector.</p> <p>2.8. National and Provincial Economic Development Plans: National and provincial economic development plans emphasize commodity beneficiation and manufacturing as key drivers for job creation, whereas increased exportation of raw minerals undermines industrialization efforts.</p> <p>2.9. Constraints on South Africa's Economic Growth: South Africa's low GDP and high unemployment can only be reversed by addressing macro-economic policies like IPAP and the Minerals Beneficiation Strategy,</p>		<p>2.5. Acknowledged. It is noted that the increase in manganese ore exports through Saldanha has not resulted in the level of local economic improvement initially projected. The proposed development aims to address this gap by facilitating a more structured and inclusive approach to economic participation, ensuring that future growth is better aligned with local development outcomes.</p> <p>2.6. Thank you for highlighting this important consideration. While it is acknowledged that simply replicating manganese ore storage and handling operations at a different location may not inherently deliver economic improvements, the proposed development is designed to generate significant positive impacts. During the construction phase, it is expected to create approximately 626 direct, indirect, and induced employment opportunities, contributing to increased household incomes and local economic activity. Similarly, in the operational phase, the project anticipates supporting around 391 jobs annually and generating substantial new business sales, which together are projected to enhance regional economic growth beyond the immediate operational footprint. These outcomes underscore the importance of aligning the development with inclusive economic strategies to maximize benefits for the local community</p> <p>2.7. We recognize the potential risk that existing operators could face reduced ore volume allocations, which may impact their operations and lead to job losses. Such outcomes would indeed be counterproductive to sectoral economic growth. It is therefore essential that the proposed development is carefully coordinated with current stakeholders to manage volumes equitably and support a sustainable operational environment</p>

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	<p>including overcoming constraints on downstream steel manufacturing.</p> <p>2.10. AMSA Saldanha Steel Facility and Export of Raw Minerals: The AMSA Saldanha Steel facility, which is mothballed due to competition from low-cost imported steel, aims to mitigate losses by supplying more raw minerals to offshore competitors, contributing to the facility's inevitable closure and the loss of over 900 jobs.</p> <p>2.11. Upstream Oil and Gas Marine Services Hub Development: Prior to the introduction of manganese exports, Saldanha was being developed as an Upstream Oil and Gas Marine Services and Logistics Hub, with support from Transnet National Ports Authority (TNPA), DTI, and Western Cape Provincial Government.</p> <p>2.12. Private Sector Investment in Saldanha Oil and Gas Hub: Private sector investments were made into bespoke fabrication and maintenance facilities, with DTI and PGWC contributing to the establishment of an IDZ as part of the Oil and Gas Marine Services Complex.</p> <p>2.13. Quay 204 Allocation for Oil and Gas Industry: TNPA allocated Quay 204 to the oil and gas sector for the berthing of rigs and</p>		<p>that preserves existing jobs while fostering overall economic expansion.</p> <p>2.8. Noted. National and provincial economic development plans rightly emphasize commodity beneficiation and manufacturing as essential drivers of sustainable job creation and economic growth. The proposed development, by improving the storage and handling infrastructure for manganese, aims to enhance the efficiency and reliability of ore supply. This improvement is expected to support downstream beneficiation and manufacturing activities by ensuring more consistent and higher-quality inputs. In turn, this can help strengthen local value addition, promote industrialization, and create more skilled employment opportunities, thereby aligning the development with broader economic objectives.</p> <p>2.9. Acknowledged. South Africa's challenges of low GDP growth and high unemployment require focused attention on macroeconomic policies such as the Industrial Policy Action Plan (IPAP) and the Minerals Beneficiation Strategy. Addressing these frameworks, alongside removing constraints in downstream steel manufacturing, is critical to unlocking sustainable economic growth and job creation. The proposed development can contribute to these efforts by supporting improved manganese handling, which is a vital input for beneficiation and manufacturing sectors.</p> <p>2.10. We acknowledge the challenges faced by the AMSA Saldanha Steel facility, including its mothballing driven by competition from low-cost imported steel. The facility's current strategy to mitigate losses by supplying more raw minerals to offshore competitors unfortunately risks accelerating its closure and the associated loss of over 900 jobs. This situation</p>

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	<p>drilling ships, supporting maintenance services and related job creation.</p> <p>2.14. Investments by FerroMarine Africa and Others: Companies such as FerroMarine Africa invested over R160 million in infrastructure, and others like DCD Marine and Dormac Engineering relocated their businesses to Saldanha, employing up to 700 people per project.</p> <p>2.15. Impact of Transnet's 2014 Decision on Quay 204: In 2014, Transnet announced without prior warning that Quay 204 would no longer be available for oil and gas activities, as manganese would be exported from that berth, despite the manganese not having the necessary environmental authorizations.</p> <p>2.16. Closure of Oil and Gas Sector in Saldanha: The decision to prioritize manganese exports resulted in the closure of the MPT, leading to Ferro Marine Africa and DCD Marine's liquidation, with significant job and business losses in Saldanha.</p> <p>2.17. Idle Facilities and Lost Opportunities: The facilities once used for oil and gas services now stand idle, covered in iron ore and manganese dust, with lost opportunities far exceeding the limited economic benefits from the exportation of manganese ore.</p>		<p>underscores the critical need for interventions that support local steel manufacturing competitiveness, promote beneficiation, and safeguard employment within the sector.</p> <p>2.11-2.19. The comments are noted. The specialist studies focused on the proposed development of the Logistics Hub. The projects highlighted were beyond the scope of the economic impact assessment and the Basic Assessment and refers to decisions by TNPA and not AMSA. The proposed development was on the existing footprint of the Saldanha Steel facility and will use existing link between the facility and the port. The warehouse is proposed for the logistics hub to minimise the impact of dust on the surrounding land and industries.</p> <p>2.20. Thank you for your observation. You are correct in noting that the assessment was limited to the localised economic impacts associated with the construction and operation of the proposed manganese ore storage and handling facility. The broader economic implications of the manganese export industry were beyond the scope of this particular assessment, which was focused specifically on the proposed development.</p> <p>2.21. The projected GDP impact of R92.5 million relates to the cumulative effect over the entire construction phase of the proposed development. Once operational, the facility is expected to contribute approximately R75.8 million to GDP each year, reflecting its ongoing role in supporting local economic activity</p> <p>3.3 The transport of manganese is controlled by the supplier and transporter of the manganese and is conducted according to the Safety Data Sheet for manganese developed by the mine. The transport via rail is regulated via the Australian</p>

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	<p>2.18. Saldanha IDZ/SEZ Underperformance: The Saldanha IDZ/SEZ has struggled, with only 18% of available space leased and TNPA reclaiming 139 hectares of land due to an inability to attract tenants.</p> <p>2.19. Impact of Manganese Dust on Other Industries: The lack of a quayside dedicated to non-mineral industries and the presence of manganese dust has prevented industries such as shipbuilding and ship repair from operating in the region.</p> <p>2.20. Economic Impact Assessment Limitations: The Economic Impact Assessment only addresses the local construction and operation of manganese ore storage and handling, but fails to quantify the broader economic impacts of the manganese export business.</p> <p>2.21. Limited Economic Benefit from Manganese Ore Exports: Despite the high spot value of manganese ore (\$29/ton), the bulk of the ore is mined by foreign companies, with the revenue largely banked offshore. This results in a minimal contribution to the local economy, with only R92 million projected to impact the GDP.</p> <p>2.22. Health and Environmental Costs: The local economy and community in Saldanha bear the health and environmental costs of manganese dust and its associated risks, while</p>		<p>Dangerous Good Code (ADG), international transport/carriage of dangerous goods by rail in Europe (RID), and United States Department of Transportation (US DOT) and Canada's transportation of Dangerous Goods Regulations (TDG). AMSA will endeavour to engage with suppliers of manganese to minimise dust generation from rail wagons. However, AMSA is unable to enforce emission control measures on the rail operators.</p> <p>Trucks will be covered with tarpaulins during transport.</p> <p>4. Environmental Compliance</p> <p>4.1. The proposed mitigation measures are incorporated to maintain emissions of dust within the Saldanha Steel facility</p> <p>4.2. The positive impact of the proposed warehouse location at the Saldanha Steel facility is acknowledged.</p> <p>4.3. The enclosed commodity storage facility minimises the requirement for open storage of commodities outside of the Saldanha Steel facility which will have a positive impact on surrounding dust levels. Importantly, mitigation measures within the warehouse will be implemented to further reduce dust levels, including the wetting of material during storage and transport and cleaning of haul trucks before and after material transport. Within AMSA's influence and enforcement, haul trucks will be covered with tarpaulins and roads will be inspected for spillages and excess material building following which material will be removed and swept.</p>


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	<p>industries like the Oil and Gas sector and IDZ remain negatively impacted.</p> <p>2.23. Questionable Economic Growth from Manganese Ore Storage and Handling: Without clear evidence that the new manganese ore storage and handling facility will deliver significant economic growth or create substantial new work opportunities, the application fails to demonstrate its long-term benefits to the community compared to the continued operation of existing facilities.</p> <p>3. APPLICANT STATEMENTS: ENVIRONMENTAL COMPLIANCE AND AEL AMENDMENT:</p> <p>The applicant outlines several environmental measures to comply with environmental regulations:</p> <p>3.1. Construction and Handling Facilities: The construction of a warehouse with handling facilities to store, handle, and transport 5 Mtpa of ore from the Saldanha Steel Facility to the TPT MPT in the port.</p> <p>3.2. Indoor Ore Handling: Ore will be handled indoors during offloading and reloading to minimize dust emissions.</p> <p>3.3. Tarpaulins on Trucks and Trains: All incoming wagons and trucks will be covered by</p>		<p>4.4. AMSA can recommend control measures to service providers; however, it is outside of AMSA's control to enforce these control measures.</p> <p>4.5. Following the public participation engagement, AMSA conducted an independent traffic impact assessment.</p> <p>4.6. Additional truck movement has been assessed in the traffic assessment conducted. Importantly, the 5Mtpa of bulk commodity material transported via road is the threshold allowable for storage, handling and export by the Logistic Hub operations. This is inclusive of the 2Mtpa manganese proposed import via road.</p> <p>4.7. As per the FDMP and EMPr all haul trucks will be covered with tarpaulin. Importantly, the maximum number of trucks and bulk commodities handled, will not exceed the 5Mtpa scenario.</p> <p>4.8. The manganese material transported via rail will not be an addition to the road import, but rather a substitution. The threshold of the manganese commodity import will not exceed the 4Mtpa stipulated, whether import is received via rail or road. Importantly, the rotary tippers can only receive one wagon at a time, therefore manganese and iron ore will never be received at the same time, negating the need for extra personnel.</p> <p>It should be noted that tipper trucks have a mechanically operated tarpaulin covering system that is user friendly to use to cover the trucks. Prior to truck being allowed to leave site, tarpaulins must be closed. This will be monitored by onsite staff during operation, and implementation of the EMPr will be a condition of any EA obtained. Furthermore,</p>


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	<p>tarpaulins to prevent dust dispersal during transportation.</p> <p>3.4. Dust Suppression: The ore will be wetted with chemicals to further limit fugitive dust emissions.</p> <p>3.5. Air Dispersion and Dust Fall Projections: The applicant provides atmospheric dispersion projections for ambient air particulates and dust fall projections, as well as modelling of current ambient air and dust fall measurements.</p> <p>3.6. Compliance to Regulations: The applicant assures that they will comply with air quality regulations and is seeking an amended AEL for the proposed operations.</p> <p>4. RDAG - AEL PORTFOLIO COMMENTS: ENVIRONMENTAL COMPLIANCE AND AEL AMENDMENT</p> <p>4.1. Impact on Air Quality: Saldanha and the neighboring towns of Vredenburg and Langebaan are already inundated with ore dust, which is affecting the lives of the community through airborne pollution and denying them access to clean air as prescribed by the Constitution.</p> <p>4.2. Proximity to Residential Areas: The location of a new ore storage and handling facility closer to the port moves the potential of more dust and air particulates closer to the</p>		<p>as a purchaser, AMSA cannot recommend that service providers cover rail wagons with tarpaulins therefore this is out of AMSA's control to enforce. Given this, persons appointed to logistics of tarpaulin removal and fitting will be stationed within the Logistics Hub warehouse.</p> <p>4.9. Material storage will not commence until the completion of the enclosed warehouse. No material is allowed to or will be commissioned to be stored on open storage areas.</p> <p>4.10. Unfortunately, the Transnet operations are outside the scope of this project, therefore the measures implemented at Transnet are not fully known. However, measures would be aligned with their AEL and dust management plan, likely include dust extraction on the tippers, enclosed conveyors, wetting of stockpiles and roads, as applicable, and general housekeeping e.g. cleanup and sweeping.</p> <p>4.11. A cumulative assessment of this scope will require the inclusion of all Transnet operations. Unfortunately, data on the Transnet operations was not available at the time of this assessment and the operations are outside of the scope of this project.</p> <p>4.12. A cumulative assessment of this scope will require the inclusion of all Transnet operations. Unfortunately, data on the Transnet operations was not available at the time of this assessment and the operations are outside of the scope of this project.</p> <p>4.13. Acknowledged, incorporated in the revised FDMP, AMSA must install a new continuous ambient</p>

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	<p>residential community and other industries located nearby.</p> <p>4.3. Creation of Additional Dust Generation Node: The introduction of an intermediary site, which double handles the ore by offloading, storing, and re- loading the ore, creates a new node for dust generation and dispersion, over the direct delivery of the ore into the port by train or truck.</p> <p>4.4. Tarpaulin Issue: The BAR is silent on where the rail wagons and trucks leaving the mines are fitted with the tarpaulins before entering the Saldanha receiving environment.</p> <p>4.5. Traffic and Logistics Impact: The application dismisses the requirement for a traffic study, but the resultant movement of 2 Mtpa of manganese by road into the Logistics Hub requires 161 (34-ton) truck deliveries to the site per day for 365 days a year.</p> <p>4.6. Additional Truck Deliveries to MPT: Added to this is the total 5 Mtpa of various ores road transported from site to the MPT, giving an additional 228 (60-ton) truck deliveries to the MPT per day, 365 days a year.</p> <p>4.7. Tarpaulin Handling During Truck Movements: The cumulative 389 truck movements per day, or 16 per hour, giving 3.7 minutes between truck movements, all require</p>		<p>monitoring station or re-commission the exiting station. Importantly, the existing station must be relocated, prior to re-commissioning, to be more representative of ambient conditions.</p> <p>4.14. AMSA cannot be held responsible for the upkeep and operation of monitoring stations outside of its network. Furthermore, the measured wind data was used to verify the modelled data. The dispersion model was conducted as per the Regulations Regarding Air Dispersion Modelling (GNR533 of 2014) (modelling regulations) and in accordance, made use of the Weather Research Forecasting (WRF) meteorological data for the period assessed.</p> <p>4.15. The virtual sensor receptors are areas identified as sensitive receptors. These receptors are identified for the dispersion model to produce predicted impacts at the specified locations and display the potential impact of the assessed operations. As per the modelling regulations, WRF meteorological data was utilised in the dispersion model to assess the potential impact on the surrounding environment. Furthermore, the output presents the worst-case predicted impact on the surrounding environment.</p> <p>4.16. A cumulative assessment of this scope will require the inclusion of all Transnet operations. Unfortunately, data on the Transnet operations was not available at the time of this assessment and the operations are outside of the scope of this project.</p> <p>4.17. A cumulative assessment as defined could not be undertaken in the AIR as the ambient monitoring data</p>

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	<p>tarpaulins to be either fitted or removed in this time.</p> <p>4.8. Logistics Complexity and Failure Risk: Considering this manual activity and not including the other 3 Mtpa of ore entering the AMSA facility by train, requiring the removal of tarpaulins off another 136 (60-ton) train wagons per day, or 5.7 wagons per hour, giving 10 minutes per wagon around the clock for 365 days a year, develops into a mammoth logistics task that is most likely to fail after a short while.</p> <p>4.9. Dust and Fugitive Emissions from Logistics Hub: This inevitable failure will leave these ore cargo parcels open to the wind whilst being driven into or out of the Logistics Hub, generating dust fall and fugitive air emissions that are not modelled at all in the projected air quality data.</p> <p>4.10. Dust Emissions from Port Side Handling: The port side handling of this same 5 Mtpa of ore by TPT at the MPT by means of tipping trucks, followed by front-end loaders lifting and dropping these loads into skips which are mechanically dumped into the waiting ship, introduces a second round of fugitive dust into the receiving environment.</p> <p>4.11. Cumulative Dust Emissions from Two Sources: Although the MPT site is subject to a different AEL, managed by the National Authority, the Saldanha receiving environment is</p>		<p>presented includes concentrations as a direct result of AMSA operations and surrounding industrial activities. Since the measured concentrations already account for surrounding activities, the measured data is to be viewed as the cumulative.</p> <p>4.18. Acknowledged. A Health Impact Assessment was commissioned by AMSA to address the Logistics Hub operations and assess the health impact on workplace and surrounding environment, inclusive of sensitive receptors and surrounding communities.</p> <p>5. Additional Concerns</p> <p>5.1. Acknowledged, AMSA are subject to independent external audits of the EMPr and AEL which will assess compliance of the Saldanha Steel facility against these documents. Including compliance with mitigation measures, implementation and operation. Importantly these audits must be carried out annually at a minimum.</p> <p>5.2. Acknowledged, incorporated in the revised FDMP, AMSA must install a new continuous ambient monitoring station or re-commission the exiting station. Importantly, the existing station must be relocated, prior to re-commissioning, to be more representative of ambient conditions.</p> <p>5.3. Dust fallout monitoring is analysis is conducted by an independent accredited laboratory as required by the Nation Dust Control Regulations (GNR 827 of 2013).</p> <p>5.4. The Logistics Hub warehouse is proposed to be fully enclosed with additional mitigation measures applied.</p>

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	<p>singular and the cumulative dust and fugitive emissions generated from two sources handling the same AMSA source material is not considered.</p> <p>4.12. Required Correction of Cumulative Impact: This oversight must be corrected and the cumulative chain effect on the receiving environment included in the application.</p> <p>4.13. Wind Direction and Monitoring Data Issues: The SAWS wind speed and direction data provided for the proposed site indicates a predominant SW summer wind and NE winter wind. It is therefore noteworthy that the existing ambient air monitoring stations are tangential to the wind carry from the train, tipplers, haul road, and MPT, and could thus not record the actual particulate density present.</p> <p>4.14. Sensor Operational Availability and Data Quality: Furthermore, the operational availability of these sensors for data collection is low PM10 (52%) and PM2.5 (51%), both well below the 80% requirement, and then further degraded by the PM10 sensor that was not operational for two years of data collection. This measurement data failure is mentioned in the report but the modelling appears to continue with a sub-standard data set to arrive at a safe projection result.</p> <p>4.15. Potential Modelling Corruption from Virtual Sensor Sites: The modelling is</p>		<p>Material received via rail will be wetted with chemical suppressants at the rotary tippler to mitigate the generation of dust, and further wetting by water sprayers at transfer points. Overhead water sprayers will be implemented within the warehouse to reduce the generation of dust from handling of material, and vehicles will be cleaned to make sure the skip and undercarriage are clear of dust before leaving the warehouse. Additionally, vehicles must be covered with tarpaulins during transport, either leaving or entering the Logistics Hub.</p> <p>5.5. Acknowledged, the warehouse design has not been finalised and the consideration to environmental aesthetics will be taken into account.</p> <p>5.6. The operations will occur within an enclosed warehouse which is understood to reduce the noise impact on the surrounding environment. Noise levels are to be controlled and mitigated during the construction and operation phases. Noise levels are to comply with the Western Cape Noise Control Regulations PN200/13. To this, a noise assessment must be undertaken to determine the operational noise impact on surrounding environments.</p> <p>5.7. Compliance with the AEL is reported and monitored quarterly to the licensing authority. The condition in the AEL requests that we conduct open days only when there are upset plant/process conditions; however in the absence of upset plant/process conditions, no open days are required or forced. Furthermore, AMSA is a JSE registered company with various stakeholders and cannot share sensitive information into the public domain.</p>

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	<p>exacerbated by generating a grid of virtual sensor receptor sites in areas well outside the wind carry zone, and by utilising limited actual data to input into CALPUFF, the dispersion modelling could be corrupted by these anomalies.</p> <p>4.16. Cumulative Impacts Not Assessed Properly: The National Framework for Air Quality Management in South Africa also calls for air quality assessment in terms of cumulative impacts rather than the contributions from an individual facility, as highlighted in paragraph 4.12 above.</p> <p>4.17. NAAQS Compliance Issues in Modelling: Modelling the site operations impact only, without considering this 5 Mtpa ore movement into and out of the facility and down to the MPT, is not compliant with NAAQS modelling requirements. If the sum of background and predicted concentrations is more than the NAAQS, the design of the facility must be reviewed (including pollution control equipment introduced) to ensure compliance with NAAQS.</p> <p>4.18. Manganese Dust Health Impact: The Air Impact Report only addresses the impact of manganese on the receiving environment, but not on people working within the facility or people exposed to manganese dust particulates. Manganese inhalation is associated with motor neuron diseases and this matter requires</p>		<p>5.8. Haul trucks are to be always covered with tarpaulins during transport. Covering of vehicles is stipulated within the FDMP, EMPR and AEL.</p> <p>5.9. AMSA forms part of the haul road committee, that already meets routinely, where complaints, concerns and issues and environmental compliance are discussed and addressed. It should also be noted that road-sweeping and road wetting activities are already occurring. Furthermore, AMSA has its own existing road sweeping activity and road wetting activity onsite. Unfortunately, the Transnet operations are outside the scope of this project. Dust suppression along the haul road is provided in the photographs below.</p> 

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	<p>attention not only for the on-site personnel but the outside community that are exposed to the facility, especially those people in proximity of the train and truck routes where manganese dust will become prevalent especially when the tarpaulins are loose, or absent, as discussed in the paragraph above.</p> <p>5. ADDITIONAL CONCERNS RAISED BY RDAG EXCO ON THE PRESENTATION BY THE AEL DIVISION</p> <p>5.1. Enhanced Oversight by Licensing Authorities and WSP: We strongly believe that better and continuous oversight by the licensing authority and the Environmental Impact Assessment (EIA) consultants (WSP) is necessary to ensure that the proposed mitigation measures are not only implemented but adhered to over time. It is imperative that a rigorous monitoring and enforcement mechanism is put in place to ensure compliance with the standards set forth in the Environmental Authorisation (EA) and Atmospheric Emission License (AEL).</p> <p>5.2. Air Monitoring Systems and Best Practice: We are concerned about the quality of air monitoring systems currently in place. The existing air monitoring practices, which rely on the dust bucket method, are insufficient for accurately capturing air quality data in this area, especially given the high winds. We urge AMSA</p>		

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	<p>to adopt modern, best practice air monitoring systems that take into account the prevailing southwest and northeast winds, which can blow hazardous dust directly onto nearby towns such as Langebaan, Saldanha, and Vredenburg. Accurate, real-time data collection and analysis are essential for protecting the health of the community.</p> <p>5.3. Independent Monitoring of Dust Fallout: We strongly recommend that AMSA engage an independent monitoring organization, such as the Saldanha Bay Clean Air Association (SBCAA), to conduct transparent monitoring of dust fallout in the surrounding areas. This independent monitoring should operate alongside the mandated Atmospheric Emission License (AEL) monitoring. By cross-checking AMSA's data against independent data, this approach will provide a more robust and credible assessment of the facility's environmental impact.</p> <p>5.4. Dust Management and the Venturi Effect: Existing bulk storage facilities in the area are characterized by large openings, which contribute to significant dust generation within the storage systems. While the argument for covering the facility may seem adequate, it fails to address the internal dust created during handling processes, as well as the additional dust generated by the high volume of vehicle traffic entering and exiting the facility. The combination of these factors—internal handling,</p>		

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	<p>heavy traffic, and large openings—creates a Venturi effect, which sucks dust out of the facility and exacerbates air pollution. This renders the efficacy of a covered facility largely ineffective. Given these concerns, we strongly request that the proposed facility be designed with airlock chambers or other similar dust containment features to prevent dust from escaping into the surrounding environment, thereby ensuring the integrity of the facility's dust control measures.</p> <p>5.5. Industrialization and Visual Aesthetics of the Facility: There is a genuine concern that locating another industrial facility at the entrance to Saldanha could further compromise the area's aesthetic appeal and its potential as a thriving tourism destination. We believe the facility should be designed with best practices in mind to enhance, rather than detract from, the landscape. This includes incorporating thoughtful landscaping, using appropriate materials to minimize visual impact, and creating a design that allows for the coexistence of industrial facilities and other economic drivers, such as tourism. By adopting this approach, Saldanha could see greater job creation through tourism, which has been a key argument in the Environmental Impact Assessment (EIA). We would like to emphasize that similar successful models have been implemented in other parts of the world and should be adopted in Saldanha to ensure a balanced and sustainable economic future.</p>		

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	<p>5.6. Noise Pollution from Mechanical Operations: The noise generated by the offloading of materials and the use of mechanical systems such as digger loaders and other heavy machinery is a significant concern. The RDAG frequently receives complaints from local residents about being disturbed by noise, particularly in the early hours of the morning. Given the proximity of the proposed logistics hub to the community, there is a real risk that noise pollution will exacerbate the already high levels of environmental degradation. We request that noise reduction strategies be implemented and considered as a part of the EIA to mitigate this impact, particularly with respect to mechanical operations. The containment of these activities within a warehouse does not prove that noise generation will not be an issue.</p> <p>5.7. Quarterly Environmental and Safety Forums (ESF): We suggest that Environmental and Safety Forums (ESFs) be held on a quarterly basis to provide updates to the community regarding compliance with the AEL, the implementation of mitigation measures, and the results of ongoing monitoring. This will ensure that the community is kept informed and that any issues can be addressed promptly. Furthermore it promotes transparency and good social responsibility. Concerns Regarding Tarpaulin Use: As emphasized earlier, we have highlighted the risks associated with the use of tarpaulins. We believe that AMSA and Bidvest port operators must clearly demonstrate the best</p>		

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	<p>practice tarpaulin solution that will be implemented as part of the AEL. We request that these solutions be included as a mandatory requirement in the license conditions.</p> <p>5.9. Concerns Regarding the Haul Road and Dust Generation: We raise the following concerns regarding the haul road used for transporting commodities in and out of the port:</p> <p>5.9.1. Dust Redistribution on Trucks:</p> <p>5.9.1.1. Trucks arrive at the Multi-Purpose Terminal (MPT) where the road is wetted down and mixed with hazardous dust.</p> <p>5.9.1.2. As trucks drive over this sludge, dust cakes onto the sides and base of the vehicles.</p> <p>5.9.1.3. Upon exiting the MPT, the dried sludge is redeposited onto the haul road.</p> <p>5.9.1.4. As additional trucks enter and exit, the deposited dust is redistributed into the air, generating further dust emissions.</p> <p>5.9.1.5. Evidence of this occurrence has been observed, and mitigation measures are needed to address this issue.</p> <p>5.9.2. Residual Dust in Wagons and Trucks:</p>		

No.	Comment	Received from and reference	Response
	<p>5.9.2.1. After trucks and wagons are emptied at the MPT, dry dust residue remains in the vehicles.</p> <p>5.9.2.2. This residue is lifted into the atmosphere due to the Venturi effect as the trucks and wagons move, contributing to further airborne dust pollution.</p> <p>5.9.2.3. To mitigate this, tarpaulins should be used on all trucks and wagons to contain the dust and prevent its dispersion when leaving the port.</p> <p>5.9.2.4. Evidence of this occurring with current operators has been observed, highlighting the need for this mitigation.</p> <p>5.9.3. Need for Haul Road Mitigation:</p> <p>5.9.3.1. The haul road is a significant source of dust generation</p> <p>5.9.3.2. Continuous use of dust-suppression methods, such as sweepers and super sucker trucks, is required to effectively manage dust and prevent further environmental contamination on the haul road.</p> <p>5.9.3.3. Tarpaulins must be used for both entering and exiting vehicles within the port.</p>		

No.	Comment	Received from and reference	Response
	<p>5.9.3.4. Washing down of trucks and vehicles entering and exiting the MPT must take action to reduce the redistribution of sludge.</p> <p>Conclusion</p> <p>In conclusion, while we do recognize the economic potential that the proposed logistics hub may bring, we cannot ignore the significant environmental and health concerns that have been raised. We urge AMSA, BPO and the relevant authorities to take our concerns seriously and adopt the recommended best practices to minimize the adverse impacts of this facility on our community and the surrounding environment. Failure to do so will leave us with no choice but to publicly reject the application. We are willing to collaborate and support AMSA and BPO in the development of a project that sets a new benchmark for environmental responsibility and community engagement. However, we must ensure that the necessary safeguards are in place to protect both the environment and the health of those who live here.</p>		

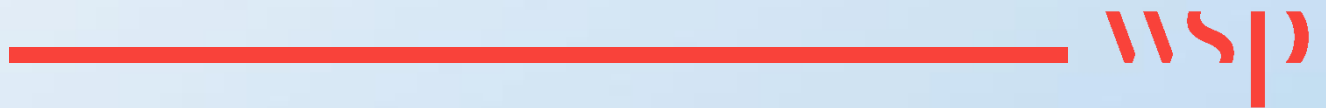
4 WAY FORWARD

The draft BAR was subjected to a PPP during 26 September to 28 October 2024, and 27 May to 27 June 2025 as per the requirements of the NEMA EIA Regulations. The BAR will be finalised and submitted to DEA&DP. DEA&DP has 107 days to provide their decision on the application for EA.

All stakeholders will be notified via email and SMS of the decision on the final BA Report.

APPENDIX F

PUBLIC PARTICIPATION



Appendix F.1

NEWSPAPER ADVERT AND SITE NOTICE - LAYOUTS AND PROOF



Appendix F.2

WRITTEN NOTIFICATION



Appendix F.4

ORGANS OF STATE NOTIFICATIONS



Appendix F.5

STAKEHOLDER/I&AP DATABASE



Appendix F.6

STAKEHOLDER CORRESPONDENCE





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PUBLIC