

1.1 Summary of Issues Raised by I&APs

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

Table 5: Summary and Issues Raised by the Interested and Affected Parties (I&APs)

Interested and Affected Parties List the names of persons consulted in this column, and Mark with an X where those must be consulted were in fact consulted		Date Comments Received	Comments and Issues Raised	EAPs response to the applicant
AFFECTED PARTIES				
Landowner/s				
Mulambwane CPA		06/11/2024	The proposed industrial projects within the MMSEZ area are supported and welcome by the communities around the area. There is high unemployment rate - especially for the youth. The proposed projects will bring the much needed economic activities and secondary value chain benefits within Musina-Makhado Local Municipalities. There are possible environmental impacts that may result from the proposed projects. We hope that the EIA/EMP currently underway will address all these impacts and management thereof. There is no objection to the proposed projects. The Mulambwane CPA - who are the directly affected parties - as the land and surface owners of the farms where the proposed projects are located, have no objection to the proposed industrial developments by Kinetic Group and SAEMB. Such projects are highly welcome for the benefit of our people, job creation and economic development.	Comments noted and will be addressed in the EIA/EMP phase.

			We welcome the proposed industrial projects in our area. Please advise on possible supply chain and procurement opportunities, employment options and economic development. Please undertake skills audit of the various communities in the area to compile a database of employable people within the affected areas. Where training is required, this must be undertaken well in advance before commencement of operations to assist the youth with possible employment.	
Mulambwane CPA Secretary Mr Aubrey Luvha		05/09/2024	No objection to the proposed developments on our land. We need the proposed projects as soon as possible.	Comments noted.
Lawful occupier/s of the land				
Landowner or lawful occupiers on adjacent properties				
Municipality Councillor: Cllr Nthaby		13/09/2024		
Municipality				
Organs of State (Responsible for infrastructure that may be affected Roads Department, Eskom, Telkom, Transnet, SANRAL, RAL				
Communities				
Community Member		13/09/2024	Where will the water they will be using for the proposed operations come from?	Investigations are being made whether to source water from Zimbabwe, the Limpopo River or to drill

				boreholes within the SEZ area/farms.
Community Member		13/09/2024	Please describe the abbreviations and their meaning - EIA, EMP, AEL, IWULA, EAP	Each of the abbreviations was explained and their respective meaning: EIA- Environmental Impact Assessment EMP- Environmental Management Programme AEL- Atmospheric Emission Licence IWULA- Integrated Water Use Licence Application EAP - Environmental Assessment Practitioner
Community Member		13/09/2024	I saw some learnerships and internships posted by MMSEZ, are they in any way related to the coming development?	We are not aware on the mentioned learnerships and internships by MMSEZ. However, both Kinetic and SAEMB plan to offer training for potential employees for the various proposed industries.
Community Member		13/09/2024	Can you give an explanation of a coke plant?	In the coking plant, coal is heated in the absence of oxygen to 1250c. This removes any impurities in the coal, resulting in coke, which is a porous substance that is nearly all carbon
Community Member		13/09/2024	What is photovoltaic plant?	Photovoltaic plant is a large solar power plant.
			On which farm will the solar plant be developed?	Dreyer 526 MS
Community Member		13/09/2024	Will the solar supply be enough? There are people living in villages as far as Nzhelele without electric power	The solar plant is specifically for the proposed projects for industrial purpose as backup power in

				case of power shortages from Eskom.
Community Member		13/09/2024	Which source of water are they likely to go for?	Investigations are ongoing but borehole could be the best option right now.
Community Member		13/09/2024	Is there an estimate of how much water they will need?	The amount of water will vary from plant to plant. This will be confirmed during the EIA/EMP/IWULA phases.
Community Member		13/09/2024	You said there will be roads, if we have some of the machineries used in road construction can we provide services?	The communities and services providers organize themselves and list all possible services they can provide in the proposed projects so that the investors can be advised accordingly.
Community Member		13/09/2024	Will the trucks used in transporting of coal be sourced locally or will they be form somewhere else?	Transport of coal and coke will be required both to the market and from various coal suppliers. Offtake agreement can be reached if locals have business potential and delivery capabilities.
Community Member		13/09/2024	They say education is power. Majority of youth in the villages are not working. We know that this development will be of great benefit to the communities and people who have been waiting for employment. Thank you for this type of information.	Comment noted.
Community Member		13/09/2024	Won't blasting at the adjacent Syferfontein mine affect the projects you are talking about?	The proposed metallurgical project will be within 500m from the exiting Syferfontein Mine. However the construction foundations will be designed

				to withstand the blasting vibrations.
Community Member		13/09/2024	Will there be a need for transport to take people to and from work and can we offer such services - including clinic services.	These are all possible opportunities that will need to be explored.
Isaac Sakie Nengovhela Makhado		05/11/2024	The info on this coming project of mmsez most of the beneficiary are not informed by the meetings that are taking place and the benefits for this coming project. Myself most of the meetings we are not informed. I am requesting to be enrolled on the database of the interested party on the above-mentioned project. I am interested in seeing mining developement in the area, therefore kindly send foward me any information regarding this project.	Commented noted. Email registered in the l&Aps list for all future communication about the projects. Registration done, and comment noted.
Jabu Linden Jan Arkert Francois Meyer HB Knott Richard Sowry Ramukakate Nkhiphitheni Richmond Boerdery CC Hennie Erwee Deena van Niekerk Aubrey Maluleke Elaine Mills Tony Carnie Mukwevho Mulisa MP Zwaulu Mashudu Muabve Mukhethwa Magadani Omphulusa Tshililo Lebo Tlou Makushu Polly Ngwana Vhutali Rangata Kay		05/11/2024 07/11/2024 08/11/2024 09/11/2024 10/11/2024 26/11/2024 27/11/2024 04/12/2024	Registration as an l&AP for Environmental Impact Assessments for processes concerning the Musina-Makhado SEZ. What would the water be used for? Has the boreholes been identified and tested? Please provide results. What is the quality of water? Mopani area is water scarce, hence the application/proposed project is of concern. The area has high unemployment rate amongst the youth. The project is supported. With reference to your email below, I am a registered l&AP but was not copied (I received your notification email from my colleague). Please could you ensure that all l&APs are copied. In addition, I presume that you meant 9 December as 8th is a Sunday?	Registration done and comments noted and will be investigated in the EIA/EMP/IWULA Phase. All interested and affected parties that have specifically requested to be registered for this project have been registered and communicated with. The comment period on the scoping report is 30 days - ending 08th December 2024 (Sunday), with allowance for comments to be received till 10th December 2024 as outlined in the regulations.

Angel Maliga Livhuwani Ramalivhana Rev. Mboyi Col Peter Mashudu Madavha Winnie Tsheole Violet Nemathithi Tshubwana Lwamondo Cllr Aron Madavha Zacks Maduwa Michelle Koyama Ian Burman Christelle Grimbeek Liz Pattison Desiree Laverne Jeffrey Fhumulani Majuta Fabian Pindus Mike Jewitt Theo Kotze Reuben Maroga Lisa Thompson Paul Furniss Michele Pickover Dave Rudolph Christa Engelbrecht Advocate Mzwandile Simelane James Kinghorn Tshifhiwa Nephalama			I would please like to register my interest as a stakeholder in order to prevent significant environmental degradation in the Vhembe Biosphere Reserve in Limpopo. Pepper Bark Environmental and Development is an organisation in Musina working around Climate Change, Mitigation and Adaptation...We focus on Water, Energy, Mining and the Environment. We would like to register as an interested and affected party for the MMSEZ projects. May you also share with us the KML file that illustrates the layout of the proposed infrastructure? I am an Advocate who is admitted in the High Court of South Africa and I wish to apply my expertise to assist the company and it's stakeholders in seeing the project to it's successful juncture. We are NET Investments (PTY) LTD and are an interested party to the Musina-Makhado Special Economic Zone project.	Comments noted and will be investigated in the EIA/EMP Phase. All I&As registered for the Kinetic Ferrochrome Smelter Project.
Dept. Land Affairs				
Traditional Leaders				
Dept. Environmental Affairs (LEDET)		10/10/2024	LEDET is still in process to determine the integrated application process - therefore separate applications must be submitted for the waste management license and atmospheric emissions license.	Comments noted.

			The final scoping report and plan of study for EIA must be submitted within 44 days.	
Dept. of Water and Sanitation (DWS)		05/11/2024	No activity may take place within a horizontal distance of 100m to a water resource or within a 1:100 year floodline. No development is allowed within a 500m radius of a boundary of a wetland. Should the development trigger any of the Section 21 water uses of the National Water Act, then an application for water use must be submitted for review and decision prior to undertaking of the triggered water uses.	Comments noted and will be complied with.
Other Competent Authorities affected				
Other Interested and Affected Parties				
The Herd Nature Reserve The Centre for Applied Legal Studies Living Limpopo		16/09/2024	10Mt/a coal washery - that's ten million tons a year to be mined locally by Kinetic and supplied to the smelter x 30 years (which actually exceeds the economically recoverable fraction of the 10 billion tons of hard coking and thermal resources of the coalfield).	The coal wash plant will be operated by SAEMB. Coal ore will be sourced from various suppliers/mining companies. 10Mt is the planned maximum capacity for the wash plant. Production will be subject to available raw coal at the plant.
Trevor Van Staden Catherine Dzerefos Christo Vorster Charlie Roux Ramona Joubert George Mills Lizelle Mills Neville Campbell Barend Jacobus Strydom Ruan Wolvaardt		17/09/2024 18/09/2024 19/09/2024 25/09/2024 02/10/2024 29/10/2024 30/10/2024 01/11/2024 02/11/2024 03/11/2024	I/we submit the following preliminary comments and questions (optional): I am/we are opposed to coal-based development and industrialisation of the Vhembe region as a grossly unsustainable basis for development, I/we object to the development of the Musina-Makhado Special Economic Zone and the Greater Soutpansberg Coalfield to which these noxious industrial projects are integral, I/we object to the construction of a heavy industrial zone on land	Comments noted and will be addressed in the EIA/EMP phase.

Adrienne Waterman LEANNE MCCANN Pierre Thomas Ursula Brandenberger Valmaggia Steven Reed Bianca Apker Brett Apker Dean McGee Graeme Whyte Cairine Whyte Bruce Murray Dylan Hugo Marius Mostert Quintin Motebele Herman Claassens Gert Esterhuizen Bester Scheepers Cecil Henry Nel Alan Whyte Michiel Van wyk Hester Van Wyk Franco Benedetti Patrick Bond Barbara Van Koppen Frank Munyai Susan Comrie Tshifhiwa Ramabulana Gwendolyn Wellmann Natasha Lalloo Armand Coetzee Dreschelda Coetzee Elise Tempelhoff Richard van der Spuy Steven Roskelly Bruce Ochse Xabiso Ndinisa Barbara van Koppen Petrus Snyders		04/11/2024 06/11/2024 08/11/2024 09/11/2024 10/11/2024 11/11/2024 12/11/2024 13/11/2024 14/11/2024 15/11/2024 16/11/2024 17/11/2024 08/12/2024 09/12/2024 10/12/2024	classified as of critical biodiversity value and ecological support areas. Environmental impact, to our conservation efforts. As well as affecting tourism to our area. Affecting our income and all the jobs we provide to our community. This is a sensitive, water scarce region of which the predominant economic activities are eco-tourism and sustainable hunting. The development of an industrial site would be disastrous to the entire area. These developments would be better suited to existing towns eg Musina or Makhado. We are selling our beautiful heritage and land away. This will destroy our beautiful natural land and environment. Water scarce area and downstream in Sand River with crops, game and conservation efforts both sides of the Sand River on the southern side of Musina Nature Reserve. This affect the environment so much and this will cause pressure on the water issue we face in this area. The air quality will decrease and will cause illnesses and the farmers and other companies in the area will suffer. The legally binding prioritization of water for poverty eradication, livelihoods and racial and gender equity (which includes widespread informal small-scale irrigation for livelihoods in Vhembe district) over water for mines is totally ignored.	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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Annalet Van Schalkwyk Marc Bowes-Taylor Susan Rautenbach Gene Claassen Joshua Barrett Kenneth Liebenberg Belinda Erasmus Moudy Mudzielwana Duane Grove Karol Furmanek Marius Botha Jan Sondergaard Hein Strydom Cheryl Smart Marguerite and Davis Suncana Bradley Carolyn Dempster Marie Louise Kellett Jan Van Rooyen Lynette Van Rooyen Jean Coetzee Steven Roskelly Dreschelda Coetzee Armand Coetzee Grant Fraser Tshinanne Mutshatshi Peter Taylor Tony Lopes Gerrie Van Der Merwe Howard Knott Cecil Henry Nel Shaun Theron Hanno Oosthuizen Milton Amoils Rob Rogan Marguerite Davis Rpss Hawkins Britz Riana			I am, like all species on earth, affected by the climate crisis. This is a very high-CO₂ project, especially from industrial-process emissions. We don't want the company to cut the trees (mopane, baobab, Marula), especially because we sell the mopane worms for money and we eat them. We also make Marula beer to sell. Access to information is crucial to the right to freedom of expression which includes freedom of the press and other media. Increasing coal mining results in use of coal which in turn contributes further to carbon emissions and climate change, which directly impacts everyone, from climate disasters to adverse health impacts. Ecosystem damage and loss of biodiversity also impacts climate change and the integrity of our environment, which infringes our rights to a protected environment All environmental issues must be addressed. Human rights, environment and cultural heritage. We are fresh produce farmers in the region. The water situation is already scarce at this moment, but with this development there will be even less water available. The existing water will also be contaminated. The impact of the pollution will also kill the plants and we will loss our farm on the long run because if we cannot produce we cannot pay our bills. There will be immediate job losses and 20 families will be without food. If you count all the job losses as a result of this operation in the region I think it will be more than this operation can create.	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comment noted and concurred with. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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Jordan Brust Andrew Savides Lauren Booth Dean McGee Jenny Griesel Megan Potgieter André du Preez Chantal Nativel Oonagh Popkin Heather Ryder Judy Van Schalkwyk Oldrich van Schalkwyk Anna Harris-Stone Stephanie Ellis Bennie Osmer Gary Smith Thalente Muriel Mncwanga Veena Rajyah Elzabe Gibson Isabel Thomson Sjaan Flanagan Nico Gibson Sharon Spiller Dylan Pons Ashleigh Gibson Sanpat Voetsee Paul Eccles Marilyn Lilley MerleGrace O'Brien James Bourhill Dalien Alberts Dries Alberts Francois Raubenheimer Moyahabo Tau Tiaan Fullard Nicolaas Boonzaaier Susan Dippenaar Francois Meyer			I am in the process of acquiring a property in the Western Soutpansberg which currently is pristine wilderness. The development of a heavy industrial zone with plans for coal mining in such close proximity to the planned development will have a material and adverse effect on my asset.	Comments noted and will be addressed in the EIA/EMP phase.
			The Vhembe biosphere, encompassing the Soutpansberg is a water scarce region with insufficient resources for current community and agricultural needs. The planned development will place unsustainable pressures on people, animals and the environment. South Africa's commitment to a clean, green energy transition runs directly counter to this planned industrialisation project.	Comments noted and will be addressed in the EIA/EMP phase.
			Damage to eco-tourism and potential biodiversity that may affect national GDP as well as the sub-climate of the area and country as a whole.	Comments noted and will be addressed in the EIA/EMP phase.
			Damage to eco-tourism and biodiversity that may affect nature based research. The area has huge ecological value and potential in nature tourism which will be permanently and irreversibly destroyed by the development.	Comments noted and will be addressed in the EIA/EMP phase.
			Details of the processes and the nature of mining as well as the technology is very critical for one to make any decisions in order to meet sustainable development goals.	Comments noted and will be addressed in the EIA/EMP phase.
			We operate and conduct eco and hunting holidays while conserving flora and fauna down stream from this proposed mega toxic SEZ both sides of the Sand River next to the Musina Nature Reserve. We also cultivate vegetables like tomatoes under contract for Tiger Brands and local hawkers as well as other products for	Comments noted and will be addressed in the EIA/EMP phase.

Leigh Corbett Jassy Mackenzie Johan Nel Claire Prince Prioshan Reddy Herman Brown Colleen Mossman Safiya Sonpra Dobek Pater Andrew Booth Fatima Cachalia Lynne Roborg Coke Heather Trumble Fr. Benedikt Andreas Hülsmann OSB Bharat Gordhan Lisa Ivy Jacqueline Wetselaar Jenw Horber Astrid Bell Kwano Zwake Camila Budden Jane Eagle Leanne McCann Cynthia Biddle Baard Robyn Symes Dean Palmer Francoise Harrison Rodrick Satchwell Kobus Basson Tyroné Michael Gray Luzia Roch Brad Baard Lutendo Mabalama Jim Thomson Brandon Landman Catharine Keene Sydney Kloppers			the Joburg Fresh Produce market. It is of great importance that water flows frequently in the Sand River past the farms to replenish bore holes and for the environment and natural habitat next to the river. Air pollution is also of a great concern and indications are that this unnecessary and unwated SEZ will have a massive impact on air pollution in this sensitive area. The EIA process is fundamentally flawed as a project of this scale and with extremely high environmental impact risk, threats to water security, should be addressed in a process that addresses cumulative impact, climate change risk as well as a high level of public participation. I live in Limpopo. The Vhembe district is part of my natural heritage The Vhembe Biosphere is recognised by UNESCO in terms of its outstanding biodiversity. It is a critical area in terms of water and cannot be reclaimed. Mining this area will be devastating for the environment and all people living in Limpopo. As a limpopo resident, i strongly oppose this proposal as an abuse if my and others right to a ckean and healthy environment. I reject the proposal to destroy my and my fellow Limpopo residents' natural heritage through the construction if abheavy industrial zine in this area of critical biodiversity value. I would like to take the opportunity to register my objection and opposition to the proposed Makhado SEZ. I am a direct neighbour to the site and this would destroy any ecotourism activity on my property. Also light, noise and air pollution would result. This is a fragile area in terms of ground water. The proposed plant would have severe impacts on water resources. There are a number of scarce bird species ie the Cori Bustard, Double banded sandgrouse, Crested	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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David Masterton Andrew Hankey Trevor Brough Diha Kruger Pieter Groenewald Esmari Wiid Suzana Caetano Menzi KaGudu Maseko Marianne Barlow Rendani Mpfuni Xolelwa Koncoshe Sheena Satikge Leandra Hale Mashikwane Ramaipadi Rene Hattingh Kate Davies Paddy Norman Leon Barnard Maropeng Mojapelo Amanda Kraft Danie Jordaan GJJ van Aswegen Carmen Vanessa Jordaan Tim Wisdom Dzhavhelo Mavhunga Msizi Kweyama Sonia Phillips Tebogo Mokoma Freddie Crossberg Nicola Clemente Harald Harvey Amelia Coogan Erinn Straughan Diana Coogan Janneke Weidema Annique Vermaak Carin McKechnie Rose Sandison			guineafowl amongst others. The habitat of these would be destroyed. The threatened pangolin would be impacted. Please preserve our natural heritage for future generations. The proposed project will have devastating impacts on the environment and must be stopped! Herewith my strongest Objection and Resistance to the proposed MMSEZ development. We are neighbors on the Western side (for more than 100 years, farming).. to the earmarked land, set for destruction, on the intentions of what is called the proposed MMSEZ development. I am part of the resistance team. Water issues not enough water. Air pollution as we don't have any silica in our material so how would the community and us be influenced with this matter. Crime from thousands getting in this area Job security to south African's. As their coal wash plants will sit right next door to us what will happen if something goes wrong. Our trust relationship between ourselves and DMRE as said with dust and noise. We are conducting blasting what will be the arrangements from their side be to evacuate the whole area from our border line. We can not even get our nuclear facilities to operate efficiently. How will this destruction of the environment impact the entire area? Working together as a nation to ensure an energy efficient climate for the generations to come. Increase in traffic on already dangerous N1 mountain pass. Water, air, noise and light pollution lead to health deterioration. Destruction of the natural	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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Megan Gardiner Penelope Morkel Jean Mackeurtan Valerie Kirchner Keren Ben zeev Anton Reynolds Ruth Dawson Sandra Shishonga Funani Tshivhase Sasha Rai Gail Smith Mosima Phadu Bronwyn Maree Jaco Botes Fatima Peters Chris Hayward Henk Honiball Joseph Hlako Danjelle Midgley Lisa Martus Iris Cohen Cath Vise Harriet Nimmo Veronique Stheeman Arda van dongen Lynne Clarke Sharon Barry Thomas Clark Charmaine Viljoen Maureen Valsecchi Amanda Irving Louise Ponder Devon Coetzee Kristin Kallesen Reinhild Voges Marilyn Lilley Vanessa Black Lavona George			beauty decrease tourism and income. Destruction by this development, affect food production.	Comments noted and will be addressed in the EIA/EMP phase.
			Currently the worst drought in 40 years is a result of climate change and the lack of water for the current populations and industries do not make this development feasible.	
			As a director of a company that operates a game reserve in the region and are dependent on the wildlife/biodiversity sector, known this unsustainable development will negatively impact our operations and environment!	
			I would like to make my voice heard that I am against the development and destruction of the Vhembe region. In a time of environmental crisis we need to protect the indigenous vegetation, not destroy it. This will impact more than the vegetation. But also the wildlife. Limpopo is one of the untouched places in South Africa. A sacred land. I don't want to see my home destroyed.	
			Inadequate infrastructure for success. Available infrastructure elsewhere in SA. Using debt for progress is high risk.	
			The negative impact of such irreversible destruction to one of SA's natural jewels will be a travesty.	Comments noted and will be addressed in the EIA/EMP phase.
			Please send all evidence that no negative impacts will take place to any endangered habitats, species and protected rivers.	
			I care about the future of South Africa, both the economy and the environment. Besides being harmful to the environment, I question why we are getting	

Mandisa Dyantyi David van Wyk Engela Hoffman Julia Eccles Mxolisi Innocent Reinardt Gilfillan Pierre Cronje Gerrie Van Der Merwe Henri Jansen van Vuren Marietha Channell Elthea Schlesinger Elaine Tribe Vivien Cohen Gavrielle Kirk-Cohen Debbie Jewitt Brent Holme Rodger Ferguson Lisa Perry Lauren Liebenberg			foreign capital to invest here on special low taxes, when we should be carrying out our own investments. All health impacts must be identified. A Health Impact Assessment HIA must be included in the assessment of granting any and all permits in this proposed industrial and extractive development and to include all the various individual industrial infrastructures and the related processes extraction, transport, storage, processing, disposal, pollution etc and to cover all Health Impacts for the full lifetime of every permit application for every individual process from the initial start of digging, constructing etc including all construction, extraction, blasting, air, chemicals used, processing, emissions throughout all process, wastes, water, transport, etc. No permits should be granted until the public and all interested and affected parties are informed as per our Constitutional Rights to information of all the health impacts related to this entire project and undertaken by impartial independent health experts including independent health experts with expertise in health impacts related to extractive industries. Environmental impacts from extractive activities impacts health in the surrounding areas and also downwind and downstream. A HIA for every various permit application and related construction and life of the permit activities is essential and the public's right to know - before every permit is granted. Impacts on environment relates to impacts on health. The Baobabs are sacred to indigenous peoples of southern Africa and free prior and informed consent required per UN biodiversity convention and UNDRIP.	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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		This development is a threat to the immense biodiversity and opportunities to enjoy nature both for present and future generations. The project has materially adverse impacts for all stakeholders in the Limpopo Province, and is in direct conflict with (and based on misappropriated intellectual property of) the zero-solid waste integrated eco-industrial vision and extensive supporting feasibility studies that were presented to dti by Eco-Industrial Solutions (Pty) Limited and the shareholders of Limpopo Eco-Industrial Park (RF) (Pty) Limited, which included a multi-modal transport border facility and predates this proposed development, that was simply shoved aside and given scant attention by the connected public servants and politicians promoting this particular development, who are reasonably suspected of having vested personal interests in pushing this "Chinese" development. This is NOT what South Africa wants or needs, nor will it enhance the livelihoods of the affected residents of the area, the greater province or South Africa. South Africa can and should do better. EAI Reports are always flawed with biased information.. These Projects impact everyone throughout the country, whether they live there, or not. We are all connected indivisibly, whether you are ignorant of this fact, or not. Every Chinese Project in RSA, and Africa as well, gives more power and control to the East Block, and less/no employment opportunities to locals who need this work. Climate change is already wricking havoc in South Africa. Limpopo is the food basket of our country therefore bringing this venture will definitely disrupt	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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		the biodiversity of Limpopo affecting food production.	Comments noted and will be addressed in the EIA/EMP phase.
		Our indigenous crops. biodiversity our lives.	
		South Africa has made a commitment to reduce its carbon emissions. Developing this project would be a violation of our promise to build a more sustainable planet by reducing further risks of climate collapse. It would be irresponsible to approve this project.	Comments noted and will be addressed in the EIA/EMP phase.
		The development of new coal mines has been highlighted by leading scientists as exacerbating climate change, which will cause major negative impacts to South Africa's economic and social well-being, and will lead to the premature death of some of her citizens.	Comments noted and will be addressed in the EIA/EMP phase.
		We must protect remaining pristine areas in the interest of limiting climate damage and conserving biodiversity of our planet.	Comments noted and will be addressed in the EIA/EMP phase.
		Notugre supports sustainable development that delivers resilient livelihoods through economic activity that compliments and supports the conservation objectives of the stakeholders involved with the Greater Mapungubwe Transfrontier Conservation area across all three countries involved, and as a party to the MoU and draft treaty for the GMTFCA we expect to be engaged in the proposed EIA process.	Comments noted and will be addressed in the EIA/EMP phase.
		Our natural inheritance will be impacted, which will affect all of us and our future generations.	Comments noted and will be addressed in the EIA/EMP phase.
		You will destroy the tourist attraction it has to offer for the world and the health of the people living in this beautiful country.	Comments noted and will be addressed in the EIA/EMP phase.

			All evidence I have seen is that the number of jobs created will not make up for the livelihoods destroyed. This is an absurd development. The EU is closing its borders to dirty carbon intensive products. SA's steel industry is already struggling because of Chinese steel over capacity and production. This project will not only not bring much needed jobs and economic development, it will negatively impact the health of those living around it. If we are serious about development we should be exploring options that do not funnel profits out of the country while leaving locals to deal with the mess left behind. We should be retrofitting houses for climate events, pursuing benefit sharing agreements for biodiversity and indigenous knowledge, developing eco tourism and agroecological endeavors. The proposed plan is exactly how we got to where we are today: massive inequality, poverty and unemployment on a burning planet. Industrial development and job creation are essential in more rural areas in particular. My concern is that this development can not be at the cost of the environmental destruction of the very ground which makes the project possible ! The choice of the site must be carefully considered - we may not saddle our children and grandchildren with the consequences of poor environmental considerations for a project of this nature ! Short term gains at the expense of the long term wellbeing of natural heritage, water, animals and humans. Words are cheap. Mitigation measures are not policed and rehab is not done once the developers/miners have taken their profits, leaving unsightly scars on the environment.	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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			I am objecting removing protected trees that supports the communities and Limpopo as a whole. And the steel and coal facility that will pollute the pristine environment and rivers that so many communities depend on. People living in vhembe region depend on subsistence farming to live. There are few jobs and this is important for food security of the elderly and children. Additionally, it alleviates poverty to be able to grow food. This mine will destroy the income, livelihood and food security of elderly women and children. Limpopo has had unprecedented flooding and drought because of climate change. By having this mine in the area it will increase the vulnerability of people already living below the poverty line. I object to this mine. As a passionate advocate for sustainable development, environmental conservation, and cultural preservation in the Limpopo province, Love Limpopo has been actively involved in promoting responsible tourism and community empowerment initiatives throughout the region. Our organisation, Love Limpopo, has a long-standing commitment to safeguarding the natural beauty, cultural heritage, and economic prosperity of the province. Through collaborative efforts with local communities, government agencies, and environmental organisations, we have successfully spearheaded numerous projects aimed at preserving the unique identity and ecological integrity of the Limpopo landscape. Tourism is compatible with the ecological support systems provided by vegetation and river courses in this area of critical biodiversity and is therefore a long term income provider whereas coalfields have a finite life, during which	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. The proposed project is not a mine, but a ferrochrome smelter. Comments noted and will be addressed in the EIA/EMP phase.
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		environmental damage occurs which will interfere with tourism objectives, putting severe financial pressure on an industry that can provide employment indefinitely if the landscape remains untouched. A biosphere reserve is a protected area and must remain such. While I support employment for people living in Limpopo, this must be done in a sustainable manner. I support the alternatives put forward by Living Limpopo. This is an irreplaceable site and central to the cultural and spiritual history of South Africans. Pollutants from this plant will also affect surrounding and downstream communities who rely on the river. This project must be refused an alternative found. Extractive Industries are not helpful for local economies. Underground water and biodiversity damage to surrounding environment damaging fauna and flora in the area. Cancel all mining and development structures. I would like to register my concern regarding the MMSEZ project in Mesina-Makhado. I am concerned about the environmental impact and destruction of protected trees, such as our iconic baobab tree. It is unfathomable that over 600 000 trees will be destroyed for this project to be constructed. I am objecting to this mass destruction of our protected tree. I am also wondering if you are aware that Limpopo is one of the water scarce provinces and want to find out where the water for this immense project will be sourced. This project is a disgrace to a country, the Constitution of which is globally lauded for its	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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		visionary consolidation of human rights. The people of SA do not deserve to have this country raped by foreign interests, the greed of elitist beneficiaries and false promises to the rural population. I wish to register as an IAP in the coal and steel facility in the protected Vhembe area in Limpopo. I completely object to this development on the grounds that it is massively damaging to the environment, destroys hundreds of thousands of protected trees, other plants and animals, will cause extensive environmental damage and degradation, cause significant pollution which will harm surrounding communities. It is also not inline with South Africa's commitments to reduce reliance on fossil fuels and the countries Constitution which guarantees the right to a healthy environment and the protection of the environment for current and future generations. We read in your report that "the annual output of high carbon ferrochrome will be 125 300 tonnes, and future output expansion up to 1 000 000 tonnes." The ratio of tonnage of CO2e emissions to tonnes of ferrochrome production is up to 6.1 (https://link.springer.com/article/10.1007/s11837-023-05707-8). So if there are going to be 6.1 tonnes of CO2 emissions, what damage will that cause to current and future generations, here and internationally? In short, do you not owe readers an estimate of the range of CO2e and other greenhouse gas emissions, and also an assessment of the Social Cost of Carbon so that full-cost accounting is feasible? So, is this the thinking now, in your EIA office and in Kinetic Development Group's planning department? Is your office willing to cause R112 billion in climate damage annually, to produce one million tonnes of	Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase. Comments noted and will be addressed in the EIA/EMP phase.
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			ferrochrome (sending profits back to Hong Kong)? Do you know the relative damage of climate catastrophe that affects ordinary people in Limpopo, and are you willing to tell the citizenry that in such a cost-benefit analysis, you believe Limpopo, South Africa, Africa and the world should bear that level of costs? This is one example where the lack of detailed data makes it difficult to assess full benefits and especially costs. If you are able to improve the document, so that impacted parties have rudimentary information, we will be grateful. We note further with reference to para. 48 of the comments submitted by All Rise, the highly irregular process of email notices and correspondence copying a large, but incomplete number of registered interested and affected parties (I&APs). The 161 I&APs copied on the email dated 8 November who remain on this thread exclude many of the 251 individuals and organisations that have registered via the Living Limpopo webpage. Kindly confirm that all these I&APs separately received the notice of the extension of the commenting period and access to the Scoping Report documents. Please advise if you require the list of registrations automatically generated by our hosting service to reconcile with your database.	Comments noted and will be addressed in the EIA/EMP phase. All interested and affected parties that have registered directly with Gudani for the proposed projects have received communication and correspondence about the projects and commenting timelines.
Centre for Environmental Rights NPC		18/09/2024 01/11/2024 07/11/2024 09/12/2024	The process is not an integrated process (in terms of NEMA), but rather there will be three separate processes (for the EIA, the Atmospheric Emissions Licence, and the WULA), as referenced in the 13 September 2024 notice; and	Comments noted and the process followed explained telephonically.

			The 60 days referred to in the 13 September 2024 notice is the time period for registering as Interested and Affected Parties (I&APs), and that further information will follow after registering. We have not received a response to our letter dated 1 November 2024, which response was due on 5 November 2024. We have reattached it for your convenience. We note that on 1 November and 4 November various additional documents related to the Scoping Report were sent to the CER, but not to all of the I&APs, contrary to Gudani's public participation obligations and in violation of the EIA Regulations among other laws. In addition, not all I&APs have been copied into this correspondence (there are just under 2000 registered I&APs, and yet less than 50 I&APs are copied here). Public participation is therefore defective and unlawful. Further, the documents sent on 1 and 4 November are not all of the reports associated with the Scoping Report, most notably, many expert reports are missing. We again reemphasise that a new PPP needs to be undertaken and a new commenting period and deadline needs to be sent to I&APs with the utmost urgency. We have still not received any response to our letter, emails or telephone calls. The current public participation process is defective and unlawful. Please note that at this time, Gudani is in dereliction of its duties as an EAP. This includes in ensuring a	The deadline for comments on the Scoping Report was on or before 08th November 2024. The deadline to register as an I&AP and to provide any comments on the project was given as 60 days after the placement of site notices and newspaper advert. The said 60 days deadline ends on the 13th November 2024. Following comments received from I&APs and request for additional information a further 30 days commenting period was afforded to all I&APs. The deadline for comments was 08th December 2024. Following comments received from I&APs and request for additional information a further 30 days commenting period was afforded to all I&APs. The deadline for comments was 08th December 2024.
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		procedurally fair public participation process and the requirement that an EAP be independent. Dereliction of your duties has legal consequences, including sanctions. As an EAP you should be aware of this, and from our various correspondence you will be aware of this. Consequently, Gudani, as the EAP in this matter, must redo the public participation process so that it is compliant with NEMA, the EIA Regulations, PAJA and the Constitution. This includes, inter alia, reissuing the notification and ensuring that I&APs have at least 30 days commenting period from the time that I&APs are given access to ALL documents relating to the Scoping Report. Given your deadline is 8 November 2024, tomorrow, this is a matter of the utmost urgency, as indicated previously. The public participation process related to the SR is defective and unlawful. The public, particularly those who will potentially be impacted by the Project, did not have access to the Scoping Report and annexures, or an adequate opportunity to consider and comment on these documents before the Environmental Assessment Practitioner (EAP) convened a community meeting, which also had inadequate notice. In addition, these documents are very technical in nature and would require additional expertise, resources and assistance for meaningful participation, particularly considering the characteristics of the affected communities, being disadvantaged, vulnerable and marginalise. The SR lacks basic facts and description of the entirety of the project and associated infrastructure, including information on what each component will	Following comments received from I&APs and request for additional information a further 30 days commenting period was afforded to all I&APs. The deadline for comments was 08th December 2024. Public participation included - site notices, newspaper adverts, electronic platforms, and public participation meeting, and extended comments period. Further public participation will be undertaken during EIA/EMP phase. Description and scope of the proposed ferrochrome smelter is outlined in
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			entail and their design; the amount and type of fuel required and proposed to be used; annual water requirements during construction and operation; wastewater volumes; solid waste volumes; and annual air pollution emissions, including heavy metals, and it fails to include an adequate baseline assessment of air, soil and water quality in the region. The SR's discussion of need and desirability for the Project is narrow and flawed, as it fails to substantively discuss why the Project is needed and desired, taking into account the potential and significant environmental and human rights impacts. The SR fails to consider the cumulative impacts of the Project itself and that of the other proposed MMSEZ industrial projects on the same site, including their environmental, health and climate impacts. The SR's analyses of water use and water availability in the region is fatally flawed, both in terms of availability and sustainability. The SR does not adequately provide for any assessment and consideration of the climate change impacts of the Project, the impacts of climate change	Section 1.6 of the SR. The detailed baseline assessment are subject to specialist studies that will be undertaken as part of the EIA/EMP Phase. The need and desirability for the project is outlined in Section 1.1 of the SR. This will be expanded further subject to specialist investigations to be undertaken in the EIA/EMP phase. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist assessment, health, water resources investigations - and cumulative impact assessment for the ferrochrome smelter project. Comments noted and will be investigated in the EIA/EMP Phase - including the specialist water resources investigations, use, availability and quality. Comments noted and will be investigated in the EIA/EMP Phase - including the
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			on the Project, or the assessment on the risk, and proposed mitigation measures. The SR failed to identify vulnerable receptors in the area or to include significant risks to surrounding communities who will need to be relocated due to the air quality impacts and hazardous waste impacts. The SR fails to sufficiently consider the Project's and the various MMSEZ projects' impacts on biodiversity, heritage and ecological function. The SR does not adequately provide for the assessment of alternatives to the proposed Project, including the "no-go" option, which is legally required to be assessed during the EIA process. Finally, the SR failed to adequately identify the scope of specialist studies required to comprehensively assess the Project's impacts and promote informed decision-making. Background Information. Although the SR purportedly concerns an application for environmental authorisation for a ferrochrome plant only, the public participation presentation to	climate change specialist assessment. Comments noted and will be investigated in the EIA/EMP Phase - including specialist socio-economic and public health impact analysis. Comments noted and will be investigated in the EIA/EMP Phase - including specialist biodiversity, heritage and ecology for the ferrochrome smelter project. The project alternatives considered is outlined in Section 1.2 of the SR - including the no-go option. List of specialists required is outlined in Section 5.4 - including additional specialists as per comments received from I&Aps. Comments noted. The information is available publicly. Combined public participation process but separate and individual
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		community members on 13 September 2024, indicated otherwise. This project includes not only a ferroalloys smelter, but also a coal wash plant, coke plant, a 600MW heat recovery plant, and a 1000MW solar power. South Africa Overarching Environmental Framework In addition, and crucially, the MMSEZ project is a large-scale proposal comprised of multiple polluting projects that could each individually and cumulatively have serious negative effects on the environment and human rights. The piecemeal and incremental approach to environmental assessments is both fatally flawed in that it does not allow the public and decision-maker to fully assess the impacts, and it is also therefore unlawful and contrary to the EIA Regulations, NEMA and the Constitution. The Competent Authority cited in the SR is the Limpopo Department of Economic Development, Environment and Tourism (LEDET). However, as will be seen below, LEDET as a government department is mandated to develop, support and finance the MMSEZ project, and therefore should not be the decision maker under the circumstances. The proposed Ferrochrome Project (and broader MMSEZ project) has implications for South Africa's international environmental commitments, most notably its commitments in terms of the Paris Agreement. The high climate impacts of the proposed Project will prejudice South Africa's mitigation and adaptation efforts, as well as its international commitments.	scoping/EIA/EMP reporting. The SR is for the ferrochrome smelter only. Comments noted and publicly documented. Similar to the ferrochrome smelter - each proposed project will be subjected to its own EIA process. The various proposed projects will be implemented by various investors/owners at different time periods. The competent authority for EAs in Limpopo is LEDET. The proposed ferrochrome smelter is proposed and funded by Kinetic Development Group - not LEDET. South Africa is a developing country that is subject to new development projects, that will/may have climate change implications. Such new development projects are subject to EIA/EMP process and adjudication - as per the process being
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			Moreover, notwithstanding the legal requirements of section 24C(2), we submit that given its far-reaching environmental and human rights impacts, the MMSEZ and proposed Ferrochrome Project are a matter of national importance, which cannot proceed without the consultation and express approval of the DFFE, among other Departments, at a national level. On the issue of bias, both actual bias and apparent bias, make an administrative decision invalid.⁴³ Apparent bias is where the administrator may not be actually biased against a person or decision, however it would appear to a reasonable person or the public that the administrator is biased. In the present circumstances, the LEDET is cited as the Competent Authority, and will therefore make the decision of whether or not to accept the SR and other processes needed to obtain environmental authorisation for the MMSEZ and associated projects, including the proposed Ferrochrome Project. Although the applicant is Kinetic Development Group, LEDET has an interest in the approval of the environmental authorisation, as LEDET is mandated to support and develop the MMSEZ project. Therefore, in addition to the incorrect Competent Authority being cited in the SR, the proposed Ferrochrome Project also has a conflict of interest with the LEDET as the Competent Authority. This is a result of the decision maker (LEDET, the cited Competent Authority) with an interest in the outcome of the decision it makes. This is due to the LEDET having a mandate to develop the MMSEZ project and receives funding to do so.	followed for the proposed ferrochrome smelter. The proposed ferrochrome smelter - and MMSEZ are a site specific and with District and Provincial importance. Comment noted. Kinetic Group is independent of LEDET. Comment noted. Kinetic Group is independent of LEDET. Comment noted. Kinetic Group is independent of LEDET. LEDET is the competent authority in Limpopo.
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			The MMSEZ project is not in the public interest due to the extensive negative impacts it will have on, inter alia: the climate and water availability; air quality and health; and the social wellbeing and livelihoods of communities in the area and the economy. The Feasibility Study outlines the one-sided benefit of the proposed Ferrochrome Project, almost exclusively in favour of China and or Kinetic Development Group. The AQIA in the previous MMSEZ EIA process recommended the removal of three local communities, and the EA authorised the removal of the Mopane community. These forced removals are reminiscent of apartheid South Africa and are not in the public interest. The previous MMSEZ EIA also indicated that due to the polluting activities, and loss of land, as well as due to competition for water, there may be a negative impact in terms of food production. If this is the case, currently a large number of jobs and profits from the food production sector may be negatively impacted. There is insufficient water for the MMSEZ project, and the communities in the area are already experiencing	Comment noted. Each proposed development project within MMSEZ will be subject to EIA/EMP authorization process - as being undertaken by the proposed ferrochrome smelter. Comment noted. This will be further investigated in the specialist socio-economic assessment - EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase - air quality assessment analysis. Should relocation of Mopane be implemented, all the necessary stakeholders - included affected families will be consulted. Comment noted and will be further investigated in the specialist socio-economic, soil and land capability assessments - EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP
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			a water deficit. Further exacerbating this problem by abstracting water for such water intensive mega projects, is not in the public interest, nor in line with sustainable development. This Project will require removal of many trees and vegetation of importance to the community from a cultural, spiritual, indigenous knowledge perspective, and as such is not in the public interest. The negative health and environmental impacts are typically disproportionately borne by poor and marginalised communities living in these areas - as are the negative costs of these impacts. This is in contravention of the NEMA 'polluter pays' principle. It is not in the interests of the public for public funds to be used to pay for social and other costs caused by polluting industries. A project that is not in the interests of the public and that has significant negative impacts is not desirable, particularly considering the proposed Project's location, and therefore not in line with clause 1(b) of Appendix 2 of the EIA Regulations. Defective Public Participation Process.	Phase - including the climate change specialist assessment and water resources investigations. Comments noted and will be investigated in the EIA/EMP Phase - including the ecology and HIA specialist investigations. Comments noted and will be investigated in the EIA/EMP Phase - including the public health specialist investigations. Comments noted and will be investigated in the EIA/EMP Phase. Public participation undertaken included - site notices, newspaper adverts, electronic platforms, and public participation meeting, and extended comments period. The medium of communication at the meeting was local languages. All I&As that
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			The documentation required for participation, most notably the Scoping Report and all expert reports and annexures, was also not provided ahead of the meeting, which meant that participants at the meeting could not meaningfully engage in the process.	have registered for the proposed ferrochrome project have been communicated with - including the owners of the land where the proposed smelter will be situated. Any changes in comments period was in response to I&Aps to afford them extended time (60 days) to submit comments and register as I&Aps. The purpose of public participation meetings is to explain technical information into simpler and non-technical interpretation for inclusive comprehension - using local language. Further public participation will be undertaken during EIA/EMP phase. The specialist investigations and reports are still to be undertaken during the EIA/EMP Phase. These report will be made available during the next phase of public participation.
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			In addition, the clearly inflated job figures from the Demacon report were presented at the public participation meeting held on 13 September 2024. The entire scope of the Project has not been identified and contains misleading and inconsistent information. There are clearly two companies involved. The relationship, contractual or otherwise, between the two companies is not disclosed in the Scoping report. It is a requirement that the applicant in an EIA process must be disclosed to the Competent Authority and the public. This includes the relationship between each applicant. The SR only describes the ferrochrome plant. No scoping report has been submitted for the rest of the projects listed in the presentation to the public. This means either the PPP was defective or insufficient information was provided in the current SR. In addition, the SR fails to address the exact capacity and production. The Project is only assessed in relation to production of 125000tons of steel. However, the project title refers to a capacity range of 125 000 tpa (tons per annum) to 1 million tpa, a capacity ratio of 1:8, but the more detailed	The proposed job figures applicable to the ferrochrome smelter are outlined in Section 1.6.13 of the SR. The scope of the proposed ferrochrome smelter is detailed in the feasibility report and in Section 1.6.2.1 of the SR. As per comments received from I&Aps the scope will further be elaborated on the EIA/EMP phase and report. The public participation notices clearly outlines the respective applicants for the mentioned various projects. The SR is applicable only to Kinetic Development Group. The separate SRs for the other projects (SAEMB) are still be compiled and submitted for public review and authorities. Comment noted and will be addressed in the EIA/EMP Phase and final feasibility report.
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			description of the Project only refers to two furnaces with a combined annual capacity of 125 328 tpa, the lower end of the capacity range. The Layout Map in the SR shows an area much larger than that of the size of the plant in the Listed Activities. The Listed Activities, which are dealt with under objection “6” below, state that the site is up to 300ha. The two companies’ projects are on the same site and appear to share some services. A scoping report for the SAEMB projects should have been submitted with the ferrochrome plant. There should not be two separate applications for what is essentially the same project as this is contrary to regulation 11 of the EIA Regulations. Missing annexures, reports and information. The SR should have identified all the project components that makes up the Project. A strategic assessment should have been done for these and the 13 other MMSEZ projects. Not all Listed Activities are listed in the Scoping Report.	The area extent under application for the proposed ferrochrome smelter is 300 Ha. The SR is for ferrochrome smelter for Kinetic Development Group. SAEMB project will be subject to its own SR. All the relevant reports, maps and documents for the SR have been made available to I&As. All other specialist reports and assessments are still be compiled in the next phase - EIA/EMP phase. The SR is specifically for the proposed ferrochrome smelter only. All other projects within the MMSEZ will be subjected to their own environmental assessment process. Listed activities applicable to the proposed ferrochrome smelter project
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			The policy and legislative context identified in Table 18 of the SR, is also inaccurate and misleading. The list relating to compliance with required legislative regimes is incorrect as there has, to our knowledge not been compliance and/or licences granted. The SR states that various legislative regimes and licence applications have been “complied with in terms of this EIA/AMP submission”. The LEDET’s stance on heritage in the area, as well as policy on heritage in general, should have been considered as part of the scoping exercise. However, this was not discussed or considered. In addition, it is alarming that the Pre-feasibility Report (which contain some design plans), makes reference to Chinese laws and standards, not South African. Failure to adequately and accurately motivate the need and desirability of the Project.	have been applied. Water related aspects will be subject to water use application with DWS. Table 18 outlines the legislative context relevant to the proposed ferrochrome smelter. The proposed smelter does not have any license or permit granted at this stage. Comments noted and will be investigated in the EIA/EMP Phase - HIA specialist. Comment noted. The proposed ferrochrome smelter designs will be adapted for RSA standards. The need and desirability is outlined in Section 1.1, and will further be elaborated on in the next phase EIA/EMP - subject to specialist studies to be undertaken.
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Natural Justice Melissa Groenink, Zenani Mhlungu David Mtshali		05/11/2024 08/12/2024 09/12/2024	We are reaching out to confirm our understanding of the current timeline for submitting comments on the MMSEZ ferrochrome EIA process. Based on the Environmental Impact Assessment, Atmospheric Emissions Licence, and Water Use Application Process Notice, the 60-day public participation period began on 13 September 2024 and is set to expire on 12 November 2024. We also acknowledge the additional documents received on 1 November and 4 November, including the sensitivity report, public participation documents, locality maps, and feasibility study. In light of this new information, we will ensure that our comments are submitted by the deadline on 12 November. Further to my email below, and upon further internal consultation, we are of the view that the minimum 30 day public participation period in terms of the EIA Regulations can only start to run when the full Scoping Report is made available to all registered I&APs for comment. The Scoping Report must necessarily include all of its annexures and specialist reports which informed it. Regulation 40 of the EIA Regulations requires that I&APs are provided with a minimum period of 30 days to comment on a Scoping Report, and sets out that the public participation process must provide access to all information that has or may have the potential to influence any decision. The Gudani website only includes the body of the Scoping Report and does not provide access to the annexures. Some of the annexures have been sent to	Comments noted and acknowledged. Following comments received from I&APs and request for additional information a further 30 days commenting period was afforded to all I&APs. The deadline for comments was 08th December 2024 (Sunday). Comments were still received on the 09th and 10th December 2024 as provided for in the EIA Regulations. Following comments received from I&APs and request for additional information and annexures a further 30 days commenting period was afforded to all I&APs. The deadline for comments was 08th December 2024 (Sunday). Comments were still received on the 09th and 10th December 2024 as provided for in the EIA Regulations.

			us from a third party, but we have not received any notification from Gudani which provides all I&APs access to the report annexures. The public participation is therefore currently defective, and we request that you re-commence the public participation period, and provide all I&APs with access to the annexures and all other relevant information. We reserve our rights to submit comments on the draft Scoping Reports after all registered I&APs have been notified of and provided access to the annexures for a period of at least 30 days. The proposed ferrochrome/ferroalloys smelter plant poses significant and unacceptable environmental and social risks. The activities involved in the development, operation, and associated infrastructure will result in increased greenhouse gas (GHG) emissions, thereby exacerbating climate change and its associated impacts, thereby contributing climate-related disasters such droughts, heatwaves, and floods, which will further compromise food security, access to clean water, and the overall well-being of affected communities. The reliance on coal-fired furnaces for the smelting process will contribute to these emissions, worsening air quality and resulting in respiratory and cardiovascular illnesses among local communities. The project is incompatible with South Africa's commitments under the Paris Agreement¹ and the United Nations Framework Convention on Climate Change (UNFCCC). South Africa has pledged to limit	Comments noted and will be investigated in the EIA/EMP Phase - including the climate change and air quality specialist assessments. Comments noted and will be investigated in the EIA/EMP Phase - including the air quality and public health specialist assessments. Comments noted and will be investigated in the EIA/EMP
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			the global temperature increase to well below 2°C, with efforts to cap it at 1.5°C. However, the approval of this project, with its substantial reliance on fossil fuels and high emissions profile, directly contradicts these commitments. Existing proven reserves of fossil fuels already exceed what can be safely utilized without causing catastrophic climate change. The addition of this project will further delay South Africa's transition to a low-carbon economy and undermine its ability to meet its international climate obligations. The environmental consequences of this project are severe. The clearance of vegetation, construction of infrastructure, and heavy reliance on water resources will disrupt critical biodiversity areas (CBAs) and ecological support areas (ESAs). Habitat destruction and fragmentation will lead to species loss and long-term degradation of ecosystems. Water use for smelter and related activities will exacerbate existing water scarcity issues in the Limpopo region, while contamination risks pose additional threats to aquatic biodiversity. The degradation of the air quality due emissions from the smelting process will harm soil quality, reduce agricultural productivity, and contribute to acid rain. The project is incompatible with South Africa's commitments under the Paris Agreement and the United Nations Framework Convention on Climate Change (UNFCCC). South Africa has pledged to limit the global temperature increase to well below 2°C, with efforts to cap it at 1.5°C. The addition of this project will further delay South Africa's transition to a low-carbon economy and undermine its ability to meet its international climate obligations.	Phase - including the climate change specialist assessment. Comments noted and will be investigated in the EIA/EMP Phase - including the ecology/biodiversity, air quality, climate change, surface water and groundwater specialist Assessments. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment.
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		The socio-economic and public health impacts of the project are profound and far-reaching. The increased presence of harmful pollutants in the air and water will result in heightened health risks, including respiratory and cardiovascular conditions. The proposed ferrochrome/ferroalloys smelter plant is neither necessary nor desirable. South Africa's development priorities should focus on sustainable and inclusive growth that aligns with global climate objectives and promotes long-term economic and environmental resilience. As the public trustee of the environment, biodiversity, and natural resources, the State has a constitutional obligation to ensure that these resources are managed sustainably and equitably for the benefit of present and future generations. Approving this project would violate this responsibility by prioritizing short-term industrial and economic gains over long-term environmental and social sustainability. In terms of regulation 22 of the 2014 Environmental Impact Assessment Regulations, the competent authority must reject the scoping report if the proposed activity conflicts with legislative prohibitions or fails to comply substantially with the regulatory requirements. The deficiencies in the Draft Scoping Report, as outlined above, demonstrate that the proposed ferrochrome/ferroalloys smelter plant does not meet the required standards. The report fails to adequately address the project's environmental and social risks and does not provide sufficient information to justify its approval. Section 240 of NEMA obligates the competent authority, when considering an application for	Comments noted and will be investigated in the EIA/EMP Phase - including the public health specialist assessment Comments noted. Comments noted. Comments noted and will be investigated in the EIA/EMP Phase.
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		environmental authorisation, to take not account “all relevant factors.” While “need and desirability” is not explicitly listed in the Act, it is incorporated as a mandatory component of a scoping report under Appendix 2 of the EIA Regulations, 2014. In terms of Item 2(f) of Appendix 2, the scoping report must include “a motivation for the need and desirability of the proposed development, including the need and desirability of the activity in the context of the preferred location. The Guideline on Need and Desirability, published in 2017 in term of Section 24J of NEMA, provides further clarity. It requires a comprehensive evaluation of whether a proposed development aligns with South Africa’s legal, policy, and developmental goals, as well as its environmental and climate change obligations. The SR justifies to justify the need for the ferrochrome/ferroalloys smelter plant by suggesting alignment with the South Africa’s energy, economic, and industrialisation goals however, South Africa does not have a coherent and finalized energy policy. The Integrated Resource Plan (IRP) is a limited and fragmented document focused solely on electricity generation. It does not provide a policy basis for industrial developments such as ferrochrome smelters, nor does it address fossil fuel reliance or emissions-intensive industries. The project does not demonstrate alignment with the National Development Plan (NDP), which emphasizes inclusive and sustainable economic growth, particularly in regions like Limpopo, where resource constraints and community vulnerabilities are pronounced.	The proposed MMSEZ site and selection thereof has already been subjected to another EIA process which has been approved for proposed metallurgical complex. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted. Comments noted and will be investigated in the EIA/EMP
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			The applicant fails to consider whether the development aligns with South Africa's Just Transition Framework, developed by the Presidential Climate Commission and approved by Cabinet. This framework calls for a shift from carbon-intensive industries to sustainable economic activities that protect vulnerable communities. The Supreme Court of Appeal's ruling in Earthlife Africa Johannesburg v Minister of Environmental Affairs and Others affirms that climate change impacts must be assessed comprehensively at the outset, considering the full lifecycle of a project. The Scoping Report fails to do so, ignoring the downstream impacts of ferrochrome production and associated emissions. The Scoping Report attempts to justify the need for the project by focusing on its industrial benefits while deferring the assessment of environmental harms to later stages of the development. This approach is legally flawed. The SCA judgment in Earthlife Africa held that a project's lifecycle impacts, including future phases such as production, must be assessed comprehensively at the initial stage. The argument that the smelter plant's climate impacts are speculative at this stage is contrary to established legal precedent and ignores the cumulative impacts of the MMSEZ. The SR does not adequately evaluate the "No-Go" alternative or other less environmentally destructive industrial options. The Guideline on Need and Desirability emphasizes that alternatives must be rigorously assessed to ensure compliance with sustainable development principles. By prioritizing an	Phase - socio-economic analysis. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment. Comments noted and will be investigated in the EIA/EMP Phase - including the No-Go option and climate change specialist Assessment.
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		emissions-intensive smelting process, the project fails to consider modern, low-carbon technologies or the benefits of leaving certain resources undeveloped. The project conflicts with NEMA principles of intergenerational equity, the precautionary principle, and sustainable development. These principles require that environmental degradation be avoided, or, where it cannot be avoided, minimized through proper planning and alternatives. Regionally, the project conflicts with the objectives of the Limpopo Climate Change Response Strategy, which prioritizes climate adaptation, water conservation, and sustainable resource use. The heavy reliance on water resources in a water-scarce region and the contribution to climate vulnerabilities demonstrate a failure to align with these priorities. The SR does not meet the substantive and procedural requirements of the EIA Regulations, 2014, and the Guideline on Need and Desirability. Its reliance on fragmented and incoherent energy and industrial policies, failure to align with climate change commitments, and lack of robust alternatives analysis render it deficient. The ferrochrome/ferroalloys smelter plant is neither necessary nor desirable in the context of South Africa's constitutional obligations under Section 24, its policy frameworks, or its developmental goals. Its speculative economic benefits are outweighed by its demonstrable environmental and social harms. Given the scale and complexity of the Musina-Makhado Special Economic Zone (MMSEZ), including the proposed ferrochrome/ferroalloys smelter plant,	Comments noted. This EIA/EMP process seeks to investigate and align with the said NEMA principles. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment and water resources investigations. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase - socio-economic and environmental impact analysis. The proposed Kinetic Smelter is not a plan or policy, but a specific
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			an SEA is the appropriate tool to address its extensive and interrelated impacts. South Africa's international commitments under the Paris Agreement and its Nationally Determined Contributions (NDCs) further necessitate a strategic approach to environmental assessment. By enabling the evaluation of cumulative emissions, water use, and ecosystem impacts, an SEA aligns with the country's legal obligations to integrate sustainability into development planning. The EIA process for the proposed smelter plant focuses narrowly on localized impacts without addressing the cumulative and regional consequences of the MMSEZ as a whole. This fragmented approach undermines the principles of integrated environmental management outlined in NEMA and fails to provide decision-makers with a comprehensive understanding of the broader implications of the MMSEZ. The SR for the smelter plant does not include a cumulative assessment of water use, air quality impacts, or greenhouse gas (GHG) emissions. The MMSEZ includes multiple high-impact projects such as coal-fired power plants, mining operations, and other industrial activities, all of which will place significant pressure on regional resources. By excluding these considerations, the EIA process violates the EIA Regulations' requirement to assess cumulative impacts. The fragmented EIA process for individual MMSEZ projects prevents the consideration of alternative	project proposal, therefore EIA is applicable. Cumulative impacts will also be included in the assessment. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment and water resources investigations. The proposed Kinetic Smelter is no longer a plan or policy, but a specific project proposal, therefore EIA is applicable. Cumulative impacts will also be included in the assessment. Comments noted and will be investigated in the EIA/EMP Phase - including the specialist Assessments and cumulative impacts. Comments noted and will be investigated in the EIA/EMP
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		development scenarios. For example, the Scoping Report for the smelter plant does not evaluate whether renewable energy sources or less resource-intensive industrial activities could achieve economic development goals with reduced environmental harm. An SEA would provide a strategic framework for assessing such alternatives. Public participation under the EIA process is limited to stakeholders directly affected by individual projects. This excludes broader regional stakeholders who may be affected by the cumulative impacts of the MMSEZ. An SEA, by contrast, would ensure that all stakeholders, including communities, conservation organizations, and regional governments, are meaningfully engaged in the decision-making process. The MMSEZ represents a large-scale industrial initiative with significant and interrelated environmental, social, and economic impacts. The cumulative demand for water resources, the combined emissions from multiple GHG-intensive projects, and the aggregate loss of biodiversity all highlight the need for a holistic assessment that extends beyond the scope of individual EIAs. An SEA would evaluate the sustainability of the MMSEZ as a whole, considering whether its development aligns with South Africa's national and regional policies. This includes the National Development Plan (NDP), which prioritizes sustainable and inclusive economic growth, and the Low Emission Development Strategy (LEDS), which emphasizes decarbonization and climate resilience. The competent authority must mandate an SEA for the MMSEZ before approving any individual project applications. This strategic approach is necessary to	Phase - including the specialist Assessments and cumulative impacts. Public participation process is open to all interested and affected parties - including those who have registered for the project. Comments noted. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist Assessment and socio-economic analysis. Comment noted.
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			ensure compliance with South African environmental law, alignment with international climate commitments, and the long-term sustainability of the Limpopo region. Inadequate notification: The SR states that notifications were issued through newspapers and electronic platforms. However, these methods are inaccessible to many rural and low-income communities in Limpopo, who often lack access to these media channels. Furthermore, the timing and locations of public meetings were not tailored to accommodate the needs of communities without reliable transportation or those with competing work obligations. These failures hinder broad and meaningful participation, excluding significant portions of the affected population from the process. The SR and supporting materials were presented in technical language, which is difficult for non-specialists to comprehend. Additionally, there is no indication that the documents were translated into local languages, which creates a significant barrier for non-English-speaking stakeholders. This exclusionary approach undermines the accessibility and inclusivity principles required by section 2(4)(f) of NEMA. Insufficient timeframes for engagement: The timeframes provided for public consultation were unreasonably short given the complexity of the project and the scale of its potential environmental and social impacts. Many affected communities require extended periods to access, analyse, and respond to the information provided. The short consultation period diminishes the meaningfulness of the public participation process, effectively reducing it to a procedural formality.	Public participation included - site notices, newspaper adverts, electronic platforms, and public participation meeting. Further public participation will be undertaken during EIA/EMP phase. The purpose of public participation meetings is to explain technical information into simpler and non-technical interpretation for inclusive comprehension. Adequate public participation timeframes were given - included and extended comments period.
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			Marginalisation of vulnerable groups: The SR fails to provide substantive responses to the concerns raised by I&APs during the public participation process. Meaningful participation requires not only the collection of stakeholder input but also its integration into project planning and mitigation strategies. The absence of detailed feedback in the report undermines the purpose of public participation and weakens stakeholder confidence in the decision-making process. A process that excludes affected stakeholders through inadequate notification, inaccessible documentation, and insufficient consultation timeframes is procedurally unfair and legally untenable. The public participation process for the proposed ferrochrome/ferroalloys smelter plant fails to meet the procedural and substantive requirements under NEMA, the EIA Regulations, and PAJA. The deficiencies in notification, accessibility, and engagement with vulnerable groups render the process procedurally unfair and legally invalid. Public participation is a cornerstone of environmental decision-making, and its failure undermines the credibility and legality of the Scoping Report. The competent authority must require the applicant to address these deficiencies and conduct a renewed public participation process that aligns with the principles of inclusivity, transparency, and environmental justice. Without such a process, the Scoping Report cannot fulfil the requirements for lawful environmental authorization Deficiencies in cumulative impact assessment in the Scoping Report.	Issues raised by I&APs will be captured in the comments and response table. The said table will be made available to registered I&APs. Public participation included - site notices, newspaper adverts, electronic platforms, and public participation meeting, and extended comments period. Further public participation will be undertaken during EIA/EMP phase. Public participation included - site notices, newspaper adverts, electronic platforms, and public participation meeting, and extended comments period. Further public participation will be undertaken during EIA/EMP phase. The SR does entail preliminary cumulative
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			Water use and water availability.	impact assessment. Detailed assessment will be included in the EIA/EMP Phase - including specialists. Comments noted and will be investigated in the EIA/EMP Phase - including the climate change specialist assessment, water resources investigations - and cumulative impact assessment.
Christo Reeders Attorneys on Behalf of: Vhembe Mineral Resources Stakeholders Forum; The Vhembe Biosphere Reserve NPC; The Western Soutpansberg Nature Reserve Association; Terblanchehoek Game Farm (Pty) Ltd; The Endangered Wildlife Trust; The Makhado Action Group; The Mudimeli Community; Anthony Taylor.		30/10/2024	There are pending review proceedings launched almost two years ago seeking to review and set aside the granting of the MMSEZ's environmental authorisation in the Limpopo Division of the High Court. The abovementioned case may only be heard during 2026/2027, Consequently, seeking environmental approval for any related subsidiary projects is hopelessly premature. In relation to the proposed water use licence applications - copies of two reports, respectively prepared in 2015 by the Institute for Groundwater Studies of the University of the Free State, Bloemfontein ("the De Lange report") and 2022 ("the Ages report") procured in the course of parallel pending litigation. The reports conclude, inter alia, that were MC Mining's Makhado- and Generaal projects to operate concomitantly, there is a material likelihood that the natural springs in Tshipise will run dry. An additional feature is that the water studies on which MC Mining relies failed to take account of the cumulative impacts which will arise from the	Comments noted and will be investigated in the EIA/EMP Phase.

			operation of the company's Chapudi- and Generaal projects. On a <i>prima facie</i> basis, no surplus water is available for the proposed projects in view of the exhaustive impact on available water resources of pre-existing water use authorisations.	
All Rise (On behalf of The Herd Reserve, Living Limpopo, and the Centre for Applied Legal Studies) Kirsten Youens		09/12/2024	Possible Fatal Flaws: Lack of water. MMSEZ site has no direct access to water GHG Emissions and the Climate Crisis - MMSEZ will be a carbon intensive industrial development. Thus, if this Project goes ahead, greenhouse gas emissions will contribute significantly to the national and global inventories and climate change and significantly affect South Africa's ability to meet its international commitments with serious consequences. No Adequate Power Supply. Therefore, there is no adequate power for the Project, and until one is secured, the EIA should be suspended. Plan of Study: Alternatives considered Environmental aspects to be considered Aspects to be assessed by specialists Method of assessing environmental impacts Impact rating matrix	Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase. Section 3.1 and 3.2 - pages 105 and 106 - including investigations of alternative sources of power for the smelter. Scoping Report Section 5.1 - page 123 Section 5.2 - page 123 Section 5.4 - page 125 Section 3.1 and 3.2 - pages 105 and 106 Section 3.1 and 3.2 - pages 105 and 106 and Table 22 - page 127

			Consultation with competent authorities Public participation during EIA/EMP phase Tasks to be undertaken during EIA/EMP phase Specialist studies required during EIA/EMP phase. Other Comments: The public participation meeting was inclusive of all proposed metallurgical plants in the MMSEZ, but the scoping report only mentions the Ferrochrome Plant. Brief mentioning of proposed ferrochrome smelter and associated infrastructure - including PCDs, flue gas purification systems, and sewage plant and management thereof. Water deficit is a major risk factor. The Feasibility Study lists major sources of pollution that are not identified in the Scoping Report. Other impacts that require thorough investigations - climate resilience, loss of land and access to natural resources, conservation, tourism, rural economy, and cumulative impacts.	Section 5.6 - page 128 Section 5.7 - page 128 Section 5.8 - page 129 Climate change specialist and assessment will also be included. The scoping report is specifically for the ferrochrome plant EIA/EMP. The other proposed plants will be subject to separate EIA/EMP processes. Comments noted and will be expanded in the EIA/EMP Phase - including waste management. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase. The specialist studies required also include the assessment of waste management, noise and air quality. Climate change specialist will be included in the list of required specialists. Land use and capability, biodiversity/ecology and socio-economic specialists already included in the Scoping Report - Section 5.4
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			The method of assessing environmental impacts is missing from the Report. Determining cumulative effects as “existing impacts + direct impacts” is of concern. All impacts of the MMSEZ and proposed surrounding coal mines must be included in the cumulative impact assessment. Suitable measures to avoid and mitigate impacts. Need and desirability cannot solely be from the applicant’s perspective and that the needs, values, preferences and judgements of society need to be factored into the EIA findings and the decision. Cumulative Impacts:	- page 125. Section 3.3 to 3.15 included preliminary assessment of cumulative impacts. Assessment of cumulative impacts will form part of the EIA/EMP phase - including the identified alternative. The impact assessment methodology is outlined in Section 3.1 - page 105. This will be updated to be in-line with the EIA Guidelines (DEAT, 1998) and as amended from time to time (DEAT, 2002) in the EIA/EMP phase. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase - taking due cognizance of the comments received from I&As. Comments noted and will be investigated in the EIA/EMP
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			The Project cannot be assessed in isolation but as part of the vast industrial and mining zone of which it is part. Public Participation: The EAP (“Gudani”) failed to send notice of the scoping to the list of more than 2000 individuals and organisations registered as Interested and Affected Parties (I&APs) in the 2022 MMSEZ EIA process and access to all the documents and annexures. Gudani only published notice of the public meeting held on 13 September 2024 in the Soutpansberger and the Limpopo Mirror newspapers on the same day it was held and only displayed a site notice one day prior. Department must instruct the applicant to commence Scoping afresh. The Scoping process and the Scoping Report cannot be remedied by the Department simply requesting a number of additions to the Plan of Study for EIA and allowing the applicant to proceed to the EIR phase.	Phase. It must be noted, however, that each proposed project, within the MMSEZ will undertake its own EIA/EMP process. The EAP has communicated and sent notices to all I&APs that have registered for proposed ferrochrome smelter EIA/EMP process - including the additional 30 days given to peruse the documents and annexures. Site notices for the public meeting were placed in various places in Makhado, Musina, and some surrounding settlements during the 30th August to 06th September - In both English and Tshivenda. The required Scoping and public participation process has been undertaken - including extension for commenting period. In addition, public participation is a continuous process - including the next EIA/EMP phase.
Environmental Consultant International (ECI)		09/12/2024	Assumptions and Limitations:	

Dave Rudolph			In the executive summary of the DSR it is stated that “The proposed ferroalloys/ferrochrome smelter plant will be within the existing and approved Musina-Makhado Special Economic Zone (MMSEZ)”. This statement is incorrect and misleading in as far as it may be approved, however the approval forms the subject of numerous judicial review processes. It appears that Gudani, has made the assumption that the review proceedings will be unsuccessful and that the authorization will be upheld. Should the review of the decision be successful this project will be fatally flawed since it relies on the MMSEZ for the provision of services and supporting infrastructure. On page 124 of the DSR Gudani admits that the Mopane area is water scarce and that alternative options for a water source must be investigated. Gudani however fails to elaborate on what “alternative water sources” can possibly exist. The scarcity of water is confirmed in the Draft Integrated Water Services Report prepared by Matukane and Associates (Pty) Ltd where it states: “The MMSEZ Southern Development site currently has no direct access to any sustainable water resources sources, apart from groundwater. Gudani has failed to correctly list or advertised the necessary activities which require Environmental Authorizations.	At the time of the DRS the proposed site for the ferrochrome smelter plant will be within the existing and approved MMSEZ area - unless the said approval has been set aside. Gudani has no jurisdiction to pre-empt nor make any assumptions on the outcome of the review proceeding. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase. The listed activities being applied for are outlined in the DSR. Should any other applicable listed activity be omitted, the application form will be amended accordingly.
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		On page 125 and 126 of the DSR, Gudani outlines the scope of study for the EIA Phase however no provision has been made for a Sustainability Impact Assessment. The construction and operation of the proposed smelter would consume significant energy, water, and materials, which might not be sustainable in the long term. The impact on sustainability and climate change must therefore be investigated. The source of the resource to be processed at the smelter is not mentioned. Presumably the resources will be transported by road or rail. The high negative impacts (noise, dust, visual, traffic) of the transportation of ore to the smelter must be assessed since it will have devastating impact on tourism in the local area. DSR fails to identify the devastating impact that the proposed industrial activity would have on the irrigation schemes and local tourism, as an “Environmental Risk”. Livelihoods and businesses are at stake and yet no mention is being made of the massive impact on the agriculture and local tourism sector in the DSR. On page 105 to 116 of the DSR Gudani prematurely assess the identified environmental impacts and attempts to preempt the significance of the impacts and then suggests that the negative impacts can be mitigated successfully through implementation of mitigation measures. ECI registered as an interested and affected party for this process and was also an active participant and a registered Interested and Affected Party of the	Comments noted and will be investigated in the EIA/EMP Phase. Climate change specialist and assessment will also be included. Comments noted and will be investigated in the EIA/EMP Phase. Comments noted and will be investigated in the EIA/EMP Phase. Scoping phase involves preliminary identification of environmental impacts and risks. These will be assessed in detailed in the EIA/EMP phase - including specialists. Notification to register Dave Rudolph as and I&AP was received by Gudani on the
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			flawed “Greater MMSEZ” Application process and also submitted an Appeal against the Environmental Authorization, yet Gudani failed to notify ECI of the availability of the Smelter Plant Project being available for public review. The DSR states that comments from I&APs are due on 8 December 2024. This is incorrect as 8 December falls on a Sunday and the review period deadline must therefore be extended to the first weekday following the 8th of December 2024 and therefore Monday, 9 December 2024 is the last day for comments. No alternatives whatsoever have been considered and the only conclusion which can be made is that Gudani is simply undertaking an environmental impact assessment process so as to drive a specific agenda, and not to find the most appropriate and sustainable alternative.	11th November 2024. Communication with registered I&APs for the Kinetic Smelter project was already done on the 08th November 2024. Comments from I&APs were still accepted on the 09th and 10th December 2024. The No-Go alternative is the other alternative under consideration for the proposed Kinetic Ferrochrome Smelter.
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