

Comments and Responses 1709 Motuoane Production Right EIA

Mr Tinashe Maramba

Date 2025/11/26 Method Email

Comment	Response
Hi ***, Please kindly provide us with a kml/kmz of the proposed PR and of the overall Exploration Right area (ER315). Please regard this as formal request to be added as an I&AP. Thanks.	Good day ***, Please find attached the KMZ as requested. Additionally, you have been added to the database as an I&AP.

Date 2025/11/26 Method Email

Comment	Response
Hi ***, Please kindly provide us with a kml/kmz of the proposed PR and of the overall Exploration Right area (ER315). Please regard this as formal request to be added as an I&AP. Thanks.	Good day ***, Please find attached KMZ .

Eloise Constandius

Date 2026/06/24 Method Email

Comment	Response
Good day Could you please register me as an interested party for the Motuoane Energy Production Right application process and let me know what the current status is of the EIA process. Thank you and regards	Good day, Thank you for your email, please note that you have been added onto our database as an I&AP, you will receive all project related notifications going forward. For any further concerns and/or queries, please do not hesitate to contact us.

Mr Tshepo Moloto

Date 2026/01/30 Method Email

Comment	Response
Good morning ***, Our conversation this morning has reference, May I please request that you share with us the co-ordinates of the polygon for the production right application. This will assist us in preparing comments. I hope you will find this to be in order. Kind regards,	Hi Tshepo, This is an acknowledgement of your email. We are still gathering the information, we will get back to you in due course.

Date 2026/01/30 Method Email

Comment	Response
Good morning ***, Our conversation this morning has reference, May I please request that you share with us the co-ordinates of the polygon for the production right application. This will assist us in preparing comments. I hope you will find this to be in order. Kind regards,	Hi Tshepo, Please find attached as requested. Additionally, please find attached the KMZ for the proposed project. T -28.189840222 27.035930723 T -28.173019046 27.027338696

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Mr Tshepo Moloto

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T	-28.177370175	26.976130056
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T	-28.193762152	26.925874707
T	-28.195203892	26.926326515
T	-28.196310573	26.926403062
T	-28.197184797	26.926654360
T	-28.199117563	26.927917242
T	-28.199949293	26.928684765
T	-28.225744767	26.930968555
T	-28.223171303	26.902141233
T	-28.230335083	26.908031879
T	-28.235108740	26.914316578
T	-28.247529000	26.910179636
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T	-28.250000006	27.009999997
T	-28.196190787	27.042010524
T	-28.186296337	27.047892965
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Mr Tshepo Moloto

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Botha

Date 2026/01/23 Method Email

Comment

Good day Could you kindly submit proof to me when I registered as interested and affected party. Thank you ,

Response

Good day ***, Apologies for the delay in response. Please note that during the initial database compilation, we do not necessarily receive requests for registration, we compile databases according to previous databases and also project related information. If you were added onto our database, it might be because according to the project specifications or previous databases, you or your organisation was identified as an I&AP. According to our database, you were registered during the first round of the Tetra4 Phase 2 EIA application. Please advise if you need us to delist you from the database.

Date 2026/01/30 Method Email

Comment

Good day You may proceed to delist me. Thank you.

Response

Good day Danie, Thank you for getting back to us. Please note that you have been delisted from the database and this is the last email you will be receiving from this sender. However, please note that you will still receive notifications for other projects within the organisation as you are still registered in other project databases. For anything further, please do not hesitate to contact us.

Mr Kirsten

Date 2026/02/17 Method Email

Comment

Good morning Please send me the full report and details of the project Thank you with kind regards,

Response

Good day Kirsten, Please note that the contents of the Scoping Reports are too large to send via email. However, you can access the full document and the associated appendices on our website. Please refer to the attached link for ease of access 1709 Motuoane Production Right EIA – EIMS. Attached to this email is the Basic Information Document and the English summary of the Scoping Report findings. We hope this is sufficient for you. Alternatively, you can forward an address

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Mr Kirsten				where we can in future send a USB stick with all the necessary documents if it makes access easier. For any further queries and/or concerns, please do not hesitate to contact us.	
Lekalakala					
Date	2026/02/06	Method	Email		
Comment				Response	
Dear Sir/Madam DFFE Directorate: Biodiversity Conservation hereby acknowledge receipt of the invitation on the 23rd of January 2026 to review and comment on the project mentioned on the subject line. Kindly note that the project has been allocated to Ms P Makitla and Ms Nompumelelo Lekalakala (Copied on this email). Please note: All Public Participation Process documents related to Biodiversity EIA review and any other Biodiversity EIA queries must be submitted to the Directorate: Biodiversity Conservation at Email: BCAdmin@dffe.gov.za for attention of Mr Seoka Lekota.				Good day Nompumelelo, Received and noted with thanks.	
Paul Lado					
Date	2025/12/01	Method	Email		
Comment				Response	
Good evening Could I be registered as an IAP for this project. Thanking you,				Good day ***, Thank you for your email, please note that you have been added onto our database, and will receive all further communication regarding the proposed project from this point going forward. For any further queries and/or concerns, please do not hesitate to contact us.	
Date	2026/01/27	Method	Email		
Comment				Response	
Good day Thank you for this notification. I note that Appendix F (Baseline Specialist studies) are not accessible on your website – clicking on the download link leads to a 404 error. Could you forward me a working link to download these documents? Thanking you,				Good day I am following up on my e-mail below. We will have difficulty commenting on the Scoping Report ahead of the 23 February 2026 due date as the Baseline Specialist Studies are not available on your website. Thanking you,	
Date	2026/01/27	Method	Email		
Comment				Response	
Good day Thank you for this notification. I note that Appendix F (Baseline Specialist studies) are not accessible on your website – clicking on the download link leads to a 404 error. Could				Good day Paul, Our sincerest apologies for not getting back to you sooner. The issue was brought to our attention, and it should be resolved on the website. Attached is the link to the working	

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Paul Lado

you forward me a working link to download these documents? Thanking you,

folder 1709 Motuoane Production Right EIA – EIMS. For any further assistance, please do not hesitate to contact us.

Date 2026/01/30 Method Email

Comment

Response

Good morning This is received, with thanks. I confirm that the link is now working. Thanking you,

Good day Paul, Thank you for the confirmation.

Date 2026/02/23 Method Email

Comment

Response

Good afternoon *** Kindly find attached hereto the Centre for Environmental Rights and Natural Justice’s comments on the Motuoane 1709 Production Right Scoping Report. The comments are submitted on behalf of Mining Affected Communities United in Action (MACUA), the Mining and Environmental Justice Community Network of South Africa (MEJCON-SA), groundWork and the Free State Environmental Justice Network (FSEJN). Kindly acknowledge receipt of the comments. We trust that the concerns raised therein will be duly considered and addressed. Thanking you,

Goo day Paul, Thank you for your comments, they have been received and noted. An appropriate response will be forwarded to you once it is compiled and finalised. For anything further, please do not hesitate to contact us.

Date 2026/02/23 Method Email

Comment

Response

Good afternoon *** Kindly find attached hereto the Centre for Environmental Rights and Natural Justice’s comments on the Motuoane 1709 Production Right Scoping Report. The comments are submitted on behalf of Mining Affected Communities United in Action (MACUA), the Mining and Environmental Justice Community Network of South Africa (MEJCON-SA), groundWork and the Free State Environmental Justice Network (FSEJN). Kindly acknowledge receipt of the comments. We trust that the concerns raised therein will be duly considered and addressed. Thanking you,

Good day ***, Please find attached the responses to your comments. Thank you for your continuous interest in the proposed project.

Date 2026/02/23 Method Email

Comment

Response

1-8. OBJECTIONS TO THE SCOPING REPORT FOR THE MOTUOANE PRODUCTION RIGHT APPLICATION, WITHIN VARIOUS FARMS IN MATJHABENG AND MASILONYA LOCAL MUNICIPALITIES, LEJWELEPUTSWA DISTRICT MUNICIPALITIES, FREE STATE PROVINCE, SOUTH AFRICA 1. The Centre for Environmental Rights submits these comments on behalf of our

1 - 8. Thank you for your comment and the clarification provided in terms of MEJCON-SA, MACUA, groundWork and the FSEJN. The Centre for Environmental Rights (CER) and Natural Justice were pre-identified as I&APs and invited to comment on the application. MACUA and MEJCON-SA were both identified as I&APs for the project and notified of the application and the

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client's, the Mining Affected Communities United in Action (MACUA), the Mining and Environmental Justice Community Network of South Africa (MEJCON-SA), groundWork and the Free State Environmental Justice Network. 2. MACUA is an alliance of community members and mine workers who strive towards building solidarity between the different forms of struggle that beset society in order to ensure that the needs of people are placed before the greed of corporates. MACUA affirms that there is no authority greater than the will of the people. MACUA works towards respect for human rights, the promotion of and respect for gender, economic, environmental and social justice, a participatory democracy that involves inclusive decision-making and solidarity with the working class. 3. MEJCON – SA consists of a network of communities, community based organisations and community members spanning across South Africa who advocate for environmental justice and the rights of those who are directly and indirectly impacted by the extractives industry. 4. groundWork is a principles driven non-profit environmental justice organisation working towards a just transition and open democracy in South Africa and beyond. 5. FSEJN, is a network established with the vision of promoting awareness of, and advocating for, environmental justice within the Free State and the country. 6. This submission is made jointly with Natural Justice who objects to the proposed Project through this submission and in their name. Natural Justice works at the local, national, regional, and international levels with a wide range of partners and strives to ensure that community rights and responsibilities are represented and respected on a broader scale and that the gains made in international forums are fully upheld at lower levels. 7. Our clients refer to Motuoane Energy (Pty) Ltd's Scoping Report in support of an application for a Production Right to explore for hydrocarbons over an area of approximately 14 400 hectares covering various farms near the towns of Welkom extending north from approximately Theunissen, Northeast towards Kroonstad and east of Virginia and Hennenman. The proposed extraction will consist of up to 43 production wells, gas gathering pipelines, a helium recovery and gas processing plant (CNG and/or LNG) and associated infrastructure, alongside ongoing exploration activities. 8. Our clients' concerns are based on the environmental and socio economic impacts associated with the proposed exploration. In particular, our clients' concerns centre around: a. The assessment of the air quality impacts; b. The assessment of the climate change impacts; c. The hydrogeological baseline investigation and associated groundwater impact assessment; d. The assessment of the social impacts e. The need and desirability of the proposed project; f. The public participation conducted; g. The assessment of Heritage impacts; h. The impacts on food security and agriculture; and i. The lack of capacity to ensure compliance and enforcement at oil and gas operations. 9. The Scoping Report only touches on the potential impacts of the project on local air quality. Unfortunately, there are no available data sources for air quality monitoring in the vicinity. Although Appendix F2 gives a detailed overview of the air quality assessment process, no actual data about any real or potential source is given or referred to. 10. Despite the lack of concrete data, there are a substantial number of known sources of air pollution in the area, which are summarized in Appendix F2,

project as well as invited to the Public Meeting held during the public review of the Scoping Report. Members of MEJCON-SA and MACUA attended the public meeting. It is noted that certain concerns are raised herewith which are addressed in detail in the specific comments and responses provided below. We trust you find this in order. 9. Baseline air quality assessment was undertaken by Airshed Planning Professionals in November 2025 (Appendix F2 of the Scoping Report). Available data for the Welkom South African Weather Service Station was used to establish baseline meteorological conditions for the proposed project site. Baseline findings are indicated in Section 9.11 of the Scoping Report. Section 10.3 of the Scoping Report and Appendix G presents the preliminary air quality impact assessment and mitigation measures. Row 2 of Table 39 of the Scoping Report indicates that air quality impact assessments will be undertaken in the EIA Phase. 10 - 15. preliminary air quality impact assessment and mitigation measures. Row 2 of Table 39 of the Scoping Report indicates that air quality impact assessments will be undertaken in the EIA Phase. 16. Many thanks for this valid comment. The Scoping Report states that the impact assessment phase of study will include the compilation of an emissions inventory, comprising the identification and quantification of potential sources of emissions due to the project. These will include project related vehicles (i.e. fuel emissions) and other equipment (i.e. generator and compressors). For clarity purposes the scoping report has been amended to itemise the sources identified by you. 17. Statement noted. A comprehensive Air Quality Impact Assessment will be conducted as part of the EIA Phase. 18 - 19. Potential emission impacts are identified on Table 36 of The Scoping Report, potentially during earthworks, exploration, production and decommissioning of drilling and seismic surveys. The Air Quality Impact Assessment will assess all pollutants due to the project activities, including but not limited to emissions from nearby tailings, trucks, drill rigs and equipment. The Air Quality Impact Assessment will determine the significance of the impacts on surrounding sensitive receptors and recommend monitoring requirements based on the significance. Vehicle and equipment air pollution emissions will form part of the specialist assessments, scored separately and included in the EIA Report / Impact Assessment Matrix. It is important to note that no slops dams are proposed for this development. 20. Many thanks for this comment. The EIA assessments will be supported by detailed and site-specific specialist studies where relevant. These studies will assess all proposed project activities and propose carefully considered mitigation measures to ensure that project activities do not result in unacceptable and / or unmitigated impacts. 21. Statement noted. 22. We acknowledge your comment; however, we do not agree with the assertion that the scoping report has failed to identify the issues and impacts that are likely to be important. Kindly refer to section 9.11 of the Scoping Report for Climate Change related impacts. As stated in the scoping report, baseline studies were undertaken as a preliminary assessment of the possible impacts and to help identify which specialist studies need to be undertaken during the EIA Phase. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications and will identify the largest emitting sources through thorough assessments. Downstream GHG emissions will also be

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namely; agriculture, mining sources, biomass burning, fugitive dust sources, roads (paved and unpaved), wind erosion of open areas, vehicle tailpipe emissions. 11. These sources are highly variable, and many of them are not easily defined or modeled. Therefore, it is critical to have good-quality data for background air quality, onto which the anticipated project emissions can be added to assess cumulative air quality. 12. Unfortunately, the nearest air quality monitor run by the national government is located in Bloemfontein, roughly 115 km southwest of the study area. Although distant, Bloemfontein experiences roughly similar wind patterns and topography as the study area. In fact, the Bloemfontein data suggests that air quality in this region is highly variable, and sometimes quite poor. According to SAAQIS, Bloemfontein experienced two major particulate matter pollution excursions in the latter part of January 2026, the first ranging above 100 µg/m³ and the second nearly reaching 300 µg/m³. 13. One 24-hour period exceeded the 40 µg/m³ NAAQS limit, reaching a high of over 43.5 µg/m³, and a second period nearly exceeded the standard, which allows for only four 24h exceedances a year. (South Africa's National Ambient Air Quality Standard requires an annual average below 20 µg/m³, with not more than four 24h periods exceeding 40 µg/m³). 14. Importantly, these limits will be significantly strengthened on 1 January 2030, setting the 24h limit at only 25 µg/m³, thus making exceedances much more likely. This will consequently reduce the acceptable emissions throughout the area, including from the Motuoane production project. 15. Thus, limited air quality data shows that air pollution in Bloemfontein may already be near allowable limits. Bloemfontein is several times larger than Welkom, so this data is not directly comparable to the study area. However, it suggests that very careful attention must be paid to both existing (background) and proposed (project) emissions, particularly after standards are strengthened on 1 January 2030. 16. Although Appendix F2 describes numerous air pollution sources, including vehicle (tailpipe) emissions, it appears to omit vehicle emissions from project-related vehicles and other equipment. Indeed, diesel emissions from construction and operations equipment are nowhere mentioned in the scoping report or in appendix F2, except a brief (and accurate) mention when describing health impacts of air pollution: "Epidemiologic studies suggest that children may be particularly susceptible to diesel exhaust." Nor does the scoping report consider air pollution emissions from fossil fuel combustion of construction and operations equipment. In particular, compressors are required to compress both natural gas (to either compressed or liquid natural gas) or for extracted helium. These compressors represent a significant energy use, and their emissions must be quantified and included. 17. The project Terms of Reference describe the following studies which must be performed during the impact assessment phase of study are; Discussion of updated meteorological data from the SAWS Welkom station for the period 2022 – 2024 are; the compilation of an emissions inventory, comprising the identification and quantification of potential sources of emissions due to the project; dispersion simulations of all potential pollutants from the project for applicable averaging periods; evaluation of potential for human health and nuisance dustfall impacts; determination of environmental risk according to stipulated impact assessment

assessed. 23. The Scoping Report states that based on the GHG emissions report for similar project in the region, the most substantial emission source is expected to be the testing of the wells and gas released during the drilling phase. It further states that as the quantification of GHG for the project will only be undertaken during the impact assessment phase, the significance rating can only be provided once the impact assessment has been undertaken. Although it is a fact that the exact quantity of gas to be produced and how much of it will eventually be burned is unknown, this EIA process does not aim to avoid assessing downstream emissions linked to the project. As stated in the Climate Change Baseline Report, the study will consider Scope 1, 2, and 3 emissions as far as is reasonable and practically possible. 24. Although wind and solar PV resources have become the default options in the replacement of existing generation with cleaner technologies, these are still supported by battery storage and flexible generation such as natural gas. One of the 2025 IRP's policy statements indicated that the 6 GW of gas CCGT by 2030 is crucial in ensuring and maintaining security of supply when the 8 GW of baseload operation of coal-fired stations is shutdown. As such, albeit small in comparison, gas still plays a vital role in South Africa's energy mix and transition. 25. It is noted that you selectively quoted only a portion of the statement and out of context. The Scoping Reports states that "the potential short-term releases of greenhouse gasses are not anticipated to significantly impact on the regional or global greenhouse gas emissions. 26. The plan of study for the Climate Change Assessment indicate that it will assess / estimate the impact of the project on national greenhouse gas emissions. The plan indicates that there will be an estimate of how the project impacts (contributes) to national greenhouse gas emissions, which is an important aspect as indicated in Section 5.4.1.3.3 and 3.1.1.3.4 of the Scoping Report. The climate change assessment will take into consideration the countries commitments and goals. 27. Many thanks for this comment. The social cost of carbon (SCC) and the mortality cost of carbon (MCC) is currently not part of the Climate Change Assessment ToR to be undertaken in the EIA Phase. 28. Kindly refer to response to items 25 and 26 above. 29. Reasonable estimates of emissions of methane, CO₂, and non-methane volatile organic compounds (NMVOCs) that would result from fuel combustion, flaring, vegetation clearing, and leaks during all phases of the project and the impact these emissions would have on climate change will be taken into consideration in the EIA phase. 30. The Scope 3 emissions will be quantified based on the activities of the proposed development. Information provided for project activities by the proponent will be used for the GHG quantification. An assessment of GHG emissions related to the downstream use of gas will also be assessed and quantified. 31. -32. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications and will include the likelihood of the proposed development being exposed to climate related financial risks. Transition risks will be discussed in the Climate Change Assessment study. It is unclear if the government has already assigned a carbon budgets to various sectors. If this is available, Airshed can assess the projects emissions relative to their fair share. 33. We acknowledge these sources and will use them as reference scenarios to benchmark the project's emissions profile. The

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methodology; recommendation of mitigation and management measures, where applicable; and compilation of a comprehensive report. 18. In addition, the EIA should include background air quality monitoring over a substantial time period, which should include wind-blown dust tailings (a very radioactive substance), inter alia. Data from the nearest SAAQIS monitor (Bloemfontein), more than 100 km away, is not appropriate to the study area; and the complexity and variety of local sources, especially area-wide sources that are difficult to quantify and to model, suggests that dispersion modelling in the region will have very large uncertainties. Given the relatively poor air quality in Bloemfontein, direct local monitoring is required in order to assess the background levels of pollution. 19. Finally, we note that Appendix G, the Preliminary Impact Assessment Matrix, does not contain vehicle or equipment air pollution emissions (as noted above) nor waste from slops dams, a significant source of volatile organic compounds which have an ongoing impact beyond drilling. These must be included to correctly assess the cumulative air quality impacts. 20. Additionally, three activity categories (Rotary-Perforation Drilling, Perforation Drilling, and Diamond Core Drilling) rank "Medium to high" for pre-mitigation air quality impacts during both Construction and Operational stages; all three of these activities rank "High" for health and safety impacts. In each case, for both air quality and for safety, mitigation is anticipated to reduce impacts to "Medium to low". In each case, the resulting score, -8.44, falls exceedingly close to the -8.5 cutoff for "Medium to high" impacts, a category of negative outcome that "may influence the decision to develop in the area". Such scoring is necessarily very uncertain. Therefore, the EIA must pay special attention to assessing each of these activities, with mitigations carefully described in detail, to ensure that they will not result in unacceptable impacts to air pollution, health, and safety. 21. Both the Climate Change Assessment (Appendix F3) and the Scoping Report mention that the quantification of Greenhouse Gas (GHG) emissions for the project will be part of the climate change specialist study that will be completed after the scoping phase. Therefore, this assessment focuses on the "Plan of Study for the Impact Assessment" and other climate change and GHG emission issues identified in the Scoping Report and Climate Change Assessment (CCA) appendix. 22. Section 2.5.3 of CCA claims the CCA followed the draft climate change impact assessment guidelines (draft guidelines) stating: "As far as possible the guideline has been followed in the preparation of this climate change impact assessment in support of environmental authorisation". According to Table 1 of the draft climate change impact assessment guidelines (draft guidelines), the purpose of scoping is "to identify the issues and impacts that are likely to be important and to establish the ToRs for EIA". The scoping report and CCA fail to do this and lack details on how the Climate Impact Assessment will meet many of the requirements in the draft guidelines. For example, the scoping report and CCA inaccurately identify the project's largest emission sources, failing to recognize that downstream combustion from the extracted fossil fuels will likely constitute the vast majority of the project's climate impact. The Plan of Study also lacks crucial details, including an assessment of transition risks and alignment with the 1.5°C global warming limit, which are

Climate Change Assessment will transparently present how project Scope 1–3 footprints compare to those pathways and discuss implications for decision-makers alongside national policy instruments and reporting frameworks. 34 - 35. Kindly refer to response to item 31 above. National policy and fair share transition commitments will be included in the assessment. 36. The statement that no fatal flaws are expected due to climate impacts is by no means a conclusion of the assessment but rather an indication that at the Scoping Phase, which was done at desktop level, no indications that the project cannot continue have been found. This is in line with national and international EIA practice. A detailed Climate Change Assessment is still required and will be undertaken in the EIA Phase. 37. Thank you for the comment, this was an error in the sizing of the column and has been rectified in the Final Scoping Report. 38 - 39. We acknowledge your comment and highlight that "draft" watermark was left in the report in error and has been removed. We confirm that the report made available for public review is the final Hydrogeological Baseline Investigation and Assessment associated with the Scoping Report. The report is titled "MOTUOANE ENERGY GAS PRODUCTION RIGHT EIA HYDROGEOLOGICAL BASELINE INVESTIGATION AND GROUNDWATER IMPACT ASSESSMENT SCOPING REPORT", dated December 2025. 40 - 41. The proposed work and Figure 1 referenced are incorrect. It appears that you are referencing the "MOTUOANE ENERGY EXPLORATION RIGHT EIA HYDROGEOLOGICAL BASELINE INVESTIGATION AND ASSESSMENT FOR SCOPING REPORT" which is a different study undertaken for a different application on properties adjacent to the proposed Production Right Application area. 42 - 43. Local investigations including but not limited to groundwater characterisation and hydrocensus are underway, the results of which will be presented in the detailed Hydrogeological Assessment Report during the EIA phase. Refer to in Section 12.3 of the Scoping Report. 44. This is the correct Production Right Application area. 45 - 46. Kindly refer to response to item 40 above. 47. Statement noted. 48. The degree of the linkage between surface and groundwater will be assessed in the EIA Phase by the Hydrogeological Assessment and measures to mitigate identified impacts will be put forward for inclusion in the EMP and implementation during the project activities. 49. Statement noted. 50. Kindly refer to response to item 48 above as well as the Section 10.3 of the Scoping Report for the description and preliminary assessment of impacts. Impacts on ecosystems will also be assessed and reported on in the EIA Report and associated biodiversity specialist's reports. 51. Row 9 of Table 39 of the Scoping Report indicates that a numerical groundwater flow and mass transport model will be developed in order to quantify and qualify the potential impact of the gas extraction as well as simulate potential saline water migration towards the shallow aquifer. The necessary mitigation and management measures will be developed in conjunction with the relevant specialists. It is also important to note that no new water abstraction licences are proposed and there is no intention to re-inject water to the subsurface. Water required for the operation of the drilling rig, as well as potable water will be obtained locally, by agreement with landowners or the local municipality, and in accordance with relevant legal requirements. 52. Again, you have referenced the wrong report. The Scoping Report indicates that according to the aquifer vulnerability map of South Africa the project area is

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necessary for a comprehensive evaluation of the project's climate compatibility and are required by the draft guidelines. 23. The Scoping Report contains inaccurate descriptions of the project's largest emissions sources. Page 178 also states: "the most substantial emission source is expected to be the testing of the wells and gas released during the drilling phase". It is important to note that many wells leak throughout their operational lifespans and even after closure, so given the relative durations of these phases, emissions from operations typically exceed those occurring during the drilling phase, and may continue post-closure. Additionally, the largest emission source for fossil fuel extraction projects is typically the end-use or combustion of the fuel, with Scope 3 emissions accounting for 80-to-95% of total carbon emissions from oil and gas companies. Chapter 5 of Appendix F3 states that "The climate change impact assessment report will consider...Scope 3 emissions (as far as is reasonable and practically possible), which consider the "embedded" carbon in bought-in materials and downstream emissions". The assessment should include Scope 3 emissions estimates from downstream combustion and if it does, those will likely be the largest GHG emission source for the project, rather than drilling phase emissions. While some EIAs attempt to avoid providing an assessment of downstream emissions by citing uncertainty about the percentage of produced gas that will be burned, the quantity of gas that will be produced, or highlighting a lack of control over the gas' end-use, it is important to note that these are not valid reasons for ignoring these emissions in the impact assessment. 24. Chapter 1 of the draft guidelines mentions that Climate Change Impact Assessments must determine "Whether the proposed development is necessary to achieve long-term decarbonisation goals". Item 1.6 in Table 13 of the Scoping Report states that the project will contribute to the "the transition from dirtier energy production (coal) to renewable energy production in the future". However, the transition to renewable energy production in South Africa and elsewhere is already well underway with no need to use additional gas as a transition fuel. According to the energy think tank Ember, in South Africa, "The rise of wind and solar power has begun to displace coal generation" and the falling cost of solar and battery storage have made it possible for energy grids using nearly 100% solar and battery storage to operate reliably and affordably in sunny areas compared with other electricity sources. In recent years, South Africa has been adding a rapidly growing amount of wind, solar, and battery storage while gas power plants remain a minor source of electricity production. According to a press release for a 2022 report by the International Institute for International Development (IISD): a. "There is no need for South Africa to invest in a gas-to-power sector at this time and pushing ahead with such plans could negatively impact the country's economy and climate." b. "While gas was once seen as a necessary "transition fuel" in the shift away from coal power, rapid declines in the cost of renewable energy and battery storage technology have upended this view." c. "What's more, the evidence suggests that gas investments would likely lead to higher energy costs for consumers, and additional just transition challenges for workers in the fossil fuel industry. And when considering methane emissions across the value chain, gas power could be as

underlain by an aquifer system with a "Moderate" vulnerability rating. Detailed local investigations including but not limited to groundwater characterisation and hydrocensus are underway, the results of which will be presented in the detailed Hydrogeological Assessment Report during the EIA phase.

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detrimental to the climate as coal.” d. “In fact, the IISD authors found that wind and solar farms in South Africa are 57% cheaper than combined-cycle gas plants for bulk electricity supply, while 3-hour battery storage is 30% cheaper than simple cycle gas plants for covering peak power demand.” 25. Page 178 of the Scoping Report bases the impact determination for planning and some construction activities on inappropriate and unuseful significance criteria, stating: “releases of greenhouse gasses are not anticipated to significantly impact on the regional or global greenhouse gas emissions and as such this impact is rated to have a low negative significance with mitigation.” 26. Comparing a project’s emissions to national or global emissions is not appropriate or helpful in understanding a project’s climate impacts. Recent interim Guidance on Consideration of Greenhouse Gas Emissions and Climate Change issued by the United States Council on Environmental Quality (CEQ) in January of 2023, which can be considered best practice, states that: (emphasis added). a. “NEPA requires more than a statement that emissions from a proposed Federal action or its alternatives represent only a small fraction of global or domestic emissions. Such a statement merely notes the nature of the climate change challenge, and is not a useful basis for deciding whether or to what extent to consider climate change effects under NEPA. Moreover, such comparisons and fractions also are not an appropriate method for characterizing the extent of a proposed action's and its alternatives' contributions to climate change because this approach does not reveal anything beyond the nature of the climate change challenge itself--the fact that diverse individual sources of emissions each make a relatively small addition to global atmospheric GHG concentrations that collectively have a large effect. b. Therefore, when considering GHG emissions and their significance, agencies should use appropriate tools and methodologies to quantify GHG emissions, compare GHG emission quantities across alternative scenarios (including the no action alternative), and place emissions in relevant context, including how they relate to climate action commitments and goals”. 27. Every ton of GHG emitted has a meaningful impact on climate. Two useful tools for demonstrating this are the social cost of carbon (SCC) and the mortality cost of carbon (MCC). The SCC represents the economic cost associated with each ton of GHG emissions, taking into account the damages caused by climate change, such as impacts on human health, agriculture, infrastructure, and ecosystems. It provides a monetary value to quantify the societal impact of emissions. The MCC represents the number of expected excess deaths caused by the emission of a given amount of GHGs. The Climate Change Impact Assessment should include discussion and calculation of the Project’s SCC and MCC in addition to, or instead of, a comparison of the Project’s emissions to national emissions. 28. Furthermore, the Plan of Study includes unhelpful impact assessment criteria and doesn’t mention applicable quantitative significance criteria. Chapter 5 of Appendix F3 provides the “Plan of Study for the Impact Assessment”. It mentions that the impact assessment will “estimate the impact of the project on national greenhouse gas emissions”. As described above, comparing a project’s emissions to national or global emissions is not appropriate or helpful in understanding a project’s climate impacts. Additionally, Table 3 of the

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draft guidelines provides a climate change impact significance rating framework which includes quantitative thresholds that aren't discussed in the Plan of Study. 29. The Plan of Study is fairly brief and lacks detail on specific methods for estimating emissions, so it will be important to make sure GHG emissions are estimated accurately and completely. Page 178 of the Scoping Report mentions that "Some common gases encountered during drilling operations include Hydrocarbons Gases, Oil and condensate gases, Carbon dioxide (CO₂), Helium (He), etc. Gas exploration may release amounts of methane, a potent greenhouse gas, either by accident or design". The Climate Change Impact Assessment should therefore include reasonable estimates of emissions of methane, CO₂, and non-methane volatile organic compounds (NMVOCs) that would result from fuel combustion, flaring, vegetation clearing, and leaks during all phases of the project including CNG or LNG plant operations, and the impact these emissions would have on climate change. 30. The plan of study also mentions that the assessment will consider "Scope 3 emissions (as far as is reasonable and practically possible), which consider the "embedded" carbon in bought-in materials and downstream emissions". The assessment of the Project's potential Scope 3 emissions should include quantitative estimates of downstream emissions that would result from the use of methane, CO₂, and other gases produced during project construction and operation. According to the introduction of the Climate Change Assessment, the project will produce methane and later liquefied natural gas (LNG). Due to additional leakage and the extra energy requirements during its production LNG has larger climate impacts than natural gas alone and these added emissions should be included in emissions calculations. 31. The Draft National Guideline for the Consideration of Climate Change Implications states that a climate change assessment must include the likelihood of the proposed development being exposed to "climate related financial risks such as transition risks, stranded assets, the negative impact on trade and market competitiveness". Additionally, the draft guidelines state that an assessment must analyze if the development is "aligned with a fair share of emissions and mitigation pathways compatible with a 1.5°C warming limit, and/or the latest scientific conclusions on what constitutes a safe warming limit." 32. The Plan of Study does not mention an assessment of transition risks and stranded assets or explicitly commit to analyzing the project specifically against the 1.5°C warming limit or safe warming limit criteria required by the Draft Guidelines. 33. South Africa has established a 2050 net-zero target. According to the International Energy Agency's Net-Zero Roadmap 2023 Update, under a global net-zero by 2050 scenario with a chance of limiting the global temperature rise to 1.5 °C, "there is no need for investment in new coal, oil and natural gas" since demand for fossil oil and gas is set to decline by at least 80% by 2050 and "the pace of decline in oil and gas demand in the 2030s may also mean that a number of high cost projects come to an end before they reach the end of their technical lifetimes". Similarly, a 2024 paper published in Science, shows "that no new fossil fuel projects are needed in a 1.5°C world" and "existing fossil fuel capital stock is sufficient to meet energy demand in representative scenarios aligned with the Paris Agreement target of limiting global warming to

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1.5°C above pre-industrial levels”. 34. A recent estimate of the global carbon budget published in 2025 found that at the beginning of 2025, the remaining carbon budget to maintain warming levels to below 1.5°C with greater than 50% probability was 130 GtCO₂eq. At current emissions levels (~50 Gt CO₂e per year), this remaining budget will likely be exhausted by the end of 2027 potentially before production by the project begins and certainly many years before its planned end. This means that the project would not be compatible with a 1.5°C warming limit and also that it would be at great risk of becoming a stranded asset if international and national warming and net-zero targets are achieved. 35. Finally, as mentioned above, the guidelines also reference an assessment of compatibility with the latest scientific conclusions on what constitutes a safe warming limit. Existing warming levels have already exceeded safe levels with climate change having exacerbated multiple catastrophic floods and droughts in South Africa. 36. The Climate Change Assessment lacks any quantitative estimates of project emissions, but provides an expected outcome for the determination of climate impacts. Chapter 4 of Appendix F3 mentions that “quantification of GHG for the project will only be undertaken during the impact assessment phase, the significance rating can only be provided once the impact assessment has been undertaken”, but then states: “No fatal flaws, however, are expected due to the climate impacts”. This determination seems premature as it is not supported with any discussion of the project’s potential for emitting GHGs, the large climate impacts of natural gas and LNG production, or any relevant significance thresholds. Additionally, as discussed above, this conclusion is likely partially based on an inaccurate understanding of the scale of the project’s operational and downstream emissions. Finally, page 178 of the Scoping Report notes: “the proposed activities will result in an increase of gas emitting wells substantially”, further highlighting the project’s potential climate impacts and the need to accurately and comprehensively evaluate them. 37. Lastly, starting on page 175, Table 37 of the Scoping Report is critical to understanding the preliminary impact assessment, however, it appears that some of the text in many of the cells in the “Phase” column is not fully visible, making it more difficult for readers to gain a full and accurate understanding of the assessment. 38. The Hydrogeology report presented in Appendix F7, MOTUOANE ENERGY EXPLORATION RIGHT EIA HYDROGEOLOGICAL BASELINE INVESTIGATION AND ASSESSMENT FOR SCOPING REPORT, dated April 2025, is submitted in a draft form, without appendices. This limits its review. 39. According to its executive summary, it states: “The objective of this investigation is to determine the status quo of the regional groundwater system and quantify and qualify potential impacts from the proposed gas exploration and extraction on sensitive environmental receptors.” 40. The proposed work consists of the following (p. 25): “Majority of the drilling target areas, Target Area 3 (ED G), Target Area 4 (ED H), Target Area 5 (ED J), Target Area 6 (ED I), Target Area 7 (ED F) and Target Area 8 (VEG A) as well as seven (7) seismic transects (Transects, ED 1-5, VEG 1-2) are proposed within the western section of the exploration right on the agricultural fields between Saaiplaas, Bronville, Thabong and Whites. Two target drilling areas, Target Area 1 (RSB D) and Target Area 2 (RSB E) are

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located in the south of ER386, approximately 7kmsoutheast of Meloding while Target Area 9 (HF C) and associated transects (Transects HF 1, HF2 and HF7) is located approximately 6km west the eastern boundary of ER386 (N1). There are currently two target areas proposed within the northern section namely, Target Area 10 (GP B) and Target Area 11 (GP A) and three seismic transect (TransectG1, G2 and G3) R34 located between Odendaalsrus and Kroonstad. Each exploration well will have an overall depth of approximately 650m and a maximum width of 350mm, commencing with a 6m x 323mm spud hole section, followed by 80m x 254mm conductor hole section, then an intermediate hole section of 450m x 203mm and finally an open hole section of 650m x 144mm. The actual casing sizes and configurations will vary depending on the specific geological characteristics and functional requirements. Each borehole will be steel cased and have cement barriers to prevent leaks as well as plugged at the end of exploration to prevent groundwater seepage.” 41. The proposed locations of the investigative boreholes are shown in Figure 1. 42. However, the completed work provides only regional background information and is based on information collected by others. Of particular notice is the absence of: local investigation (e.g., drilling, testing, monitoring); delineation and geometric characterization of aquifers; collection of any data on depth to groundwater; information on groundwater movement; information on groundwater quality; information on aquifer recharge zones and information on groundwater and surface water interaction. 43. Therefore, the report does not allow to build any opinion on whether the proposed drilling and extraction activities would have any impacts on the aquifers, the groundwater (both in quantity and quality), surface water bodies, and biodiversity. The proposed monitoring, described in Section 10 of the hydrogeology report is very general and vague. 44. The Scoping Report presents the area of the proposed project, as shown in Figure 2. 45. It is confusing because the area proposed for investigation with the drilling of 11 investigation boreholes is located north of the zone proposed for production as shown by the montage in Figure 3. 46. The hydrogeology report states: “The hydrology of the region is characterised by predominately perennial watercourses with the main rivers draining the greater study area in a general western to northwestern direction. The main watercourses within the Middle Vaal WMA are the Mooi, Vet, and Vaal Rivers. The Vaal River is a major tributary of the Orange River, which generally drains in an eastern direction towards the Atlantic Ocean. The primary rivers in and around the study area include the Vals River towards the northeast of the study area, the Sand River in the central parts of the study area, and the Vet River towards the southwest of the study area... The study area has a summer rainfall regime, with the majority of the precipitation occurring from October to March (80.02%) as high intensity thunderstorms, while June, July, and August are particularly dry.” 47. There is perennial movement of water at surface, and it can be assumed that the baseflow of these rivers is groundwater dependent. The scoping report confirms this assumption: “According to records documented by Van Tonder and Dennis (2003), under natural conditions this area exhibits certain regions where there is pronounced interaction between surface and groundwater. The two regimes are

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therefore well-linked and should be integrated to manage any water-related issues in these catchments. Regional drainages can be generally classified as influent or gaining stream systems as the groundwater head elevation of the water table in the vicinity of the stream is higher than the altitude of the stream bed and, accordingly, there definitely exists groundwater discharge as baseflow to local drainages.” 48. Therefore, any disruption of the subsurface affecting groundwater, whether in quantity, quality or both, would affect the rivers and wetlands. According to the Scoping Report: “The South African Inventory of Inland Aquatic Ecosystems spatial dataset is part of the South African Inventory of Inland Aquatic Ecosystems (SAIIAE) which was released as part of the National Biodiversity Assessment (NBA 2018). National Wetland Map 5 includes inland wetlands and estuaries, associated with river line data and many other data sets within the South African Inventory of Inland Aquatic Ecosystems (SAIIAE, 2018). Ecosystem threat status (ETS) of river and wetland ecosystem types are based on the extent to which each river ecosystem type has been altered from its natural condition. Ecosystem types are categorised as CR, EN, VU or LT (LC?), with CR, EN and VU ecosystem types collectively referred to as ‘threatened’ (Van Deventer et al., 2019; Skowno et al., 2019). The study area overlaps with multiple wetlands and river ecosystems identified by the dataset. The wetlands identified include numerous LC depressions and one CR seep. The identified river lines are CR.” 49. This information is illustrated in Figure 4, showing the presence of sensitive wetlands within the studied area. 50. In addition, Figure 5 clearly indicates that the ecosystem level is rated non-protected (NP) and poorly protected (PP) over the majority of the property. Therefore, any activity that would jeopardize ecosystems, such as the proposed project, are not recommended. 51. The main risks associated with the proposed activities are: a. Extraction of water from surface or the subsurface and net loss of water due to reinjection to the subsurface or contamination of the water. The project is located in a relatively dry area (mean annual precipitation (MAP) for the study area is estimated at approximately 531.66 mm/year), and any reduction in available water would negatively affect water dependent ecosystems. b. Contamination of both surface water and groundwater during drilling and operation; and c. Long-term permanent and irreversible contamination of both the surface and groundwater resulting from the loss of integrity of the gas wells over decades and centuries, the wells acting as pathways for the migration of poor-quality deep groundwater. 52. The scoping report provides a vulnerability rating with an index of 4 indicating that the management should consider medium level protection. This has been calculated with regional and broad information. A more local and detailed study should have been completed to estimate a more reliable and applicable rating. Although the aquifer conditions have been rated to require a medium level of protection, there is no discussion about what it means and recommended measures for investigation, operation and closure of the proposed activities.

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53 In the table listing identified impacts (Section 10.2 of Scoping report), no impacts to water have been identified for Post Construction, Final Rehabilitation, and Monitoring, Maintenance and Relinquishment. This completely omits that the drilled boreholes, although decommissioned, will still represent pathways between surface and deep depth (600 m). When drilled, a borehole is a pathway that will remain in the subsurface forever. With time (decades, centuries), the casing and sealing material will degrade due to geochemical reactions occurring in the subsurface and exposure to fluids and pressure. Therefore, there is a very high risk that movement of fluids will occur with poor quality fluids present a deep depth migrating to shallow aquifers and gradually polluting shallow aquifers and surface water systems (rivers, wetlands) they are connected to. 54 Section 10.3 further list the risks and proposed mitigative measures. For water related items, all the risks are rated to low or medium to low. It subjectively underestimates the risks and wrongly assumes that mitigative measures will be implemented and be effective. All this has been done without a detailed understanding of the aquifers, groundwater conditions and interaction between surface water and groundwater, which are usually very complex, and how all these would be temporarily or permanently disrupted by the proposed project. 55 It is also important to note that precipitation is being reduced due to climate change (illustrated in Fig 26 of the Scoping Report). This will enhance the need to protect water, and the proposed project would have adverse effects to this need for additional protection. 56 Table 39 lists the proposed level of details of the various studies to be completed for the EIA. For the proposed hydrogeological study, it appears to be relatively adequate (e.g., background definition, conceptual model, numerical model). However, some of the key subjects are omitted: a. Groundwater and surface interaction and how rivers and wetlands may be impacted in quantity and quality by the proposed activities; b. The definition of potential fluid migrations between aquifers at different depths; c. The short-term and long-term role played by the wells for conduits and how the loss of well integrity would affect aquifers and surface water bodies. This will require the numerical modeling of long-term scenarios. This will be an element to consider for Closure and Rehabilitation including very long-term cost implications; d. The disposal of return water; and e. Water needs and water balance for the proposed project. 57 Section 13.4 lists assumptions used in the hydrogeology study, including: “Groundwater divides have been assumed to align with surface water divides, and it is assumed that groundwater cannot flow across this type of boundaries.” 58 This assumption may not be valid, in particular for the deeper aquifers. It will have to be assessed during the proposed detailed hydrogeological study proposed for the EIA.	53. Surface and groundwater quality impacts have been identified post construction under the Gas Analysis and Maintenance activity with ground water monitoring highlighted as an ancillary activity. The impacts on water during closure and post closure have been identified and will be assessed during the EIA Phase. Furthermore, a numerical groundwater flow and mass transport model will be developed in order to quantify and qualify the potential impact / risk of the potential saline water migration towards the shallow aquifer. The necessary mitigation and management measures will be developed. 54 – 56. Local investigations including but not limited to groundwater characterisation and hydrocensus are underway, the results of which will be presented in the detailed Hydrogeological Assessment Report during the EIA phase. The detailed Hydrogeological and Climate Change studies that have been commissioned will further look into the water related risks and where necessary propose further mitigation measures for the project. The NEMA EIA Regulations require a preliminary assessment of impact significance and that such is updated during the EIA Phase where necessary. 57 – 58. Local investigations including but not limited to groundwater characterisation and hydrocensus are underway, the results of which will be presented in the detailed Hydrogeological Assessment Report during the EIA phase. This assumption is only valid for the shallow, unconfined aquifer. Groundwater flow in the deeper, confined aquifer will be dictated by the piezometric pressure and hydraulic head.

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Social Scoping Report 59 As drafted, the Social Scoping Report (Appendix F8) does not mention cumulative social impacts in its preliminary impact findings, nor does it outline any requirements to assess them later in the EIA process. 60 The omission of cumulative impacts from the specialist provided Social Scoping report (Appendix F8), represents a potential procedural gap and calls into question the assessment that possible social impacts pose “no fatal flaw”(page i, of Appendix F8) in the successful execution of the project according to regulated guidelines. 61 The Environmental Impact Assessment Regulations, 2014, requires the assessment of cumulative impacts (past, current, and reasonably foreseeable future impacts). In accordance, a scoping report, all specialist reports, and the EIA must contain; “... identification of impacts and risks inclusive of identification of cumulative impacts and a ranking process of all the identified alternatives focusing on the geographical, physical, biological, social, economic, and cultural aspects of the environment” [Appendix 2 para 1(d) am by GoN 326 in G. 40772.] 62 The full Scoping Report does state that “Cumulative impacts may arise from the proposed project in combination with existing and planned production/mining, energy and agricultural activities in the region, particularly in relation to land use, water resources and socio-economic change.” (page 3 of the Scoping Report). 63 It also does consider and identify some cumulative impacts (such as stakeholder fatigue) and incorporates cumulative impacts into its assessment methodology via a rating scale. However since the full Scoping Report relies on the Social Scoping Report (Appendix F8) it fails to provide a baseline that captures the social, gendered, and environmental health legacies of the region's historical gold mining industry, and fails to outline potential ways to mitigate the cumulative impacts of further extractive activities. 64 As acknowledged in the Social Scoping Report, the economy of The Lejweleputswa District Municipality (LDM) relies heavily on the gold mining sector, which is particularly relevant in the Matjhabeng and Masilonyana Local Municipalities where the project is proposed to take place. 65 While gold mining in the region initially fostered economic growth, job creation, and improved living standards, it also created economic dependencies, environmental legacies, and left communities vulnerable to economic shocks when mines declined or closed. Recent research highlights ongoing deprivation, restricted mobility, and social disruption in mining communities compared to non-mining areas. The literature also points to gendered impacts, as well as environmental degradation and related health risks which undermine livelihoods. 66 The introduction of a new extractive project into a region already shaped by successive cycles of resource extraction raises the likelihood of compounding social impacts, including prolonged economic dependence, repeated phases of in- and out-migration, cumulative pressures on social cohesion and infrastructures, and long-term effects on well-being and quality of life. Without explicitly scoping how a 30-year gas development may interact with historical and ongoing mining legacies, regional economic decline, and future closure risks, the EIA process is likely to underestimate the full social cost of the proposed activity. 67 Furthermore, the specialist Social Scoping Report and the full Scoping Report fail to adequately consider environmental justice. The Social Scoping Report does not adequately engage with the principle

59. Assessment of cumulative impacts is a requirement under the NEMA EIA Regulations and forms part of EIMS's Impact Assessment Methodology. Cumulative impacts will be assessed by all specialists including the Social specialist and the EAP during the compilation of the detailed EIA reports. 60. A full Social Impact Assessment (SIA) will be completed during the EIA phase. The statement that no fatal flaws are expected due to social impacts is by no means a conclusion of the assessment but rather an indication that at the Scoping Phase, which was done at desktop level, there were no preliminary indications that the project cannot continue. 61. Cumulative impacts have been assessed in the Scoping Report and will also be assessed in the EIA Report and the detailed specialist assessments that have been commissioned. 62. Statement noted. 63. The social, gendered, and environmental health legacies of the region's historical mining industry will be assessed and reported on in the full Social Impact Assessment to be completed during the EIA Phase. 64. Statement noted. 65. The historic shortcomings of the gold mining industry in the region and the country at large are acknowledged. However, it must not be assumed that the gas industry and in particular the proposed project which has a very small, proposed footprint and will have the same impacts. As stated above, a suite of special impact assessments have been commissioned proactively to ensure that where negative impacts cannot be avoided, they are mitigated and managed as far as possible. 66. As mentioned above, the historic shortcomings of the gold mining industry in the region and the country at large are acknowledged and the study aims to identify and assess the cumulative impacts that may result from this project. However, it must be stated that as the mining sector is on a downward trend and many businesses that have traditionally depended on the mining sector have either closed down are in the process of closing down. The proposed project has the potential to promote and support the sustainability of existing business in the local and regional economy and assist in increasing local beneficiation and shared economic growth, through extending the output production of gas. 67 – 68. The principles enshrined in Section 2 of the NEMA are the overarching basis upon which the EIA Report and detailed specialist assessment will be undertaken. Furthermore, the basis on which the impacts were assessed are clearly articulated in Section 10 of the Scoping report. These principles will further be basis upon which the EIA report and detailed specialists studies are undertaken, which will provide the Competent Authority and other commenting Government authorities with the information necessary to make an informed decision. 69. The environment as a whole (inclusive of but not limited to vulnerable groups) bears the identified impacts. The Scoping Report states that a detail social impact assessment will also be undertaken during the EIA phase to assess these impacts further and that for each impact, the impact source, pathway and receptor is discussed. 70 – 71. Preliminary assessment outcome does not sidestep the requirement of a full Social Impact Assessment which will be undertaken as part of the EIA Phase. As noted in comment / statement 70, the question is to define the level of risk and not the fairness. The response provided addresses the question. 72 – 73. Although the Scoping Report presented a summary of the baseline specialist studies, all specialists' recommendations remain important and valid. Specialist recommendations will also form the basis on which the EMP is

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of environmental justice as required under Section 2 of the National Environmental Management Act (NEMA). NEMA requires that the social, economic, and environmental impacts of development be assessed in a manner that ensures equitable distribution of benefits and burdens, with particular attention to vulnerable and historically disadvantaged communities. 68 Section 2(4)(c) of NEMA states that "Environmental justice must be pursued so that adverse environmental impacts shall not be distributed in such a manner as to unfairly discriminate against any person, particularly vulnerable and disadvantaged persons." While the report identifies a range of project-specific social impacts, it does not assess or recommend that the EIA assess how these impacts may be unevenly distributed across different groups, nor how they may interact cumulatively with existing social and economic pressures in a region already shaped by prolonged extractive activity. 69 In the full Scoping Report, Ref 2.10, in Table 13: Needs and desirability analysis for the proposed exploration activities, asks what measures were taken to pursue environmental justice. The response references the impact assessment in Section 10. However Section 10 does not assess who bears the identified impacts or whether the impacts are likely to fall on vulnerable communities. 70 Furthermore, Ref 2.6.2 in Table 13 asks what the level of risk is related to vulnerable communities. The Scoping Report response is; "The level of risk is considered low as the project is not expected to have far reaching negative impacts on socio-economic conditions" (Table 13, page 71 of the Scoping Report). 71 The report assumes that because the preliminary and potential overall impact is low, the distribution is fair. This effectively sidesteps the requirement to actively assess impact or ensure fairness for vulnerable persons. 72 Also, there are a number of specific or measurable recommendations made in Appendix 8 that appear to have been generalized, softened, or omitted in the main Scoping Report's preliminary mitigation summaries. 73 The specialist report explicitly notes that in accordance with NEMA, the project must consider environmental and restorative justice (page 11 of Appendix 8). It also notes that "vulnerable communities should be protected from negative environmental impacts" (page 10 of Appendix 8). The full Scoping Report side steps this responsibility by claiming there to be no far reaching negative socio-economic impacts for which justice dimensions need be considered. The Scoping Report also treats affected communities as a homogeneous group or focuses on property owners, overlooking the specific needs of vulnerable persons. 74 The specialist report explicitly recommends: "Ensure at least 70% of opportunities go to local contractors" (Table 8, page 61 of Appendix 8) as a mitigation strategy, however the Scoping Report softens this specific quantitative target to a qualitative statement: "Local suppliers and workers must be prioritised as far as possible for economic and professional growth" (Table 37, page 193, of the Scoping Report). 75 The specialist report recommends the appointment of an agricultural economist to address impacts on livelihoods and related to the loss or productive land, grazing, and hunting income (Table 8, page 61 of Appendix 8). However, in section 2.5 (Specialist Consultants), the Scoping Report lists the required specialists for the EIA phase as "Biodiversity Company" to undertake the study on "Agricultural Potential, Soils & Land Capability" (Table 4, page 6 of the

developed. 74. Kindly refer to response to item 73 above. 75. The nature and scale of the proposed project is not expected to have a significant impact on the broader socio-economic environment or the agricultural sector in the Free State. As such it is the EAP's view that an agricultural economist study is not warranted. A detailed Agricultural Impact Assessment will be undertaken during the EIA Phase. 76. The scoping and specialist studies also places emphasis on the need for negotiations with landowners and where it is agreed that compensation should follow the IFC standard, this will be adhered to. 77 – 80. The Social Scoping Report acknowledges the shortcomings of the information available in the public domain (i.e. StatsSA) and therefore complies with the requirements of the EIA Regulations. A full Social Impact Assessment will be completed during the EIA phase to accurately present baseline conditions for the socio-economic environment of the project area and to identify potential social impacts. As such, there will be no overreliance on what you consider "outdated or statistically compromised data".

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Scoping Report). An Agricultural Economist is a distinct specialist who is trained to calculate financial loss models for farm businesses. 76 The specialist report recommends that the applicant "Compensate for actual losses following the International Finance Corporation (IFC) principles" (page 19 of Appendix 8). IFC Performance Standard 5 (PS5) governs land management, requiring developers to avoid or minimize involuntary land acquisition and resettlement. The Scoping Report only states that affected landowners will be reasonably compensated for "any loss of revenue caused by the exploration works" (Table 37, page 178, of the Scoping Report). The specific reference to the IFC standard has been replaced with the domestic legal standard of "reasonable compensation," which may offer different protections to landowners. 77 The Social Scoping Report also relies on outdated and statistically compromised data. 78 The Environmental Impact Assessment Regulations, 2014, Appendix 6 requires all specialist reports to include an "indication of the quality and age of base data used for the specialist report" [Annexure 6 para 1(1)(cA) ins by GoN326 in G. 40772.]. The Social Scoping Report does comply with this requirement by disclosing the shortcomings of the 2022, 2016, and 2011 census data used. For example: "The data used for the socio-economic description was sourced from Census 2022, Community Survey 2016, and Census 2011. ... The results should be viewed as indicative of the population characteristics in the area and should not be interpreted as absolute." (Page 34, Appendix F8) and "Census 2022 is the very high undercount of 31% of people and 30% of households. While census undercounts are the norm rather than the exception (about a 5% undercount is acceptable), the undercount of this census may set a new international record" (Page 34, Appendix F8). 79 Other census data issues raised in the report include a lack of granularity, a misalignment in some boundaries between census years, changes in how labor data was collected between census years, and the exclusion of transient populations including migrant labour. 80 This reliance on outdated or statistically compromised data calls into question the Social Scoping Report's ability to accurately present baseline conditions for the socio-economic environment of the project area and to identify potential social impacts.

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Need and desirability 81 Appendix 1 to the EIA Regulations 2014 states that one of the objectives of the basic assessment process is to "identify the alternatives considered, including the activity, location, and technology alternatives and describe the need and desirability of the proposed alternatives" inter alia. 82 The Department of Forestry, Fisheries and the Environment Guideline on Need and Desirability in the Environmental Impact Assessment Process requires that need and desirability be assessed not only in economic or technical terms, but through a contextsensitive, spatially informed, and socially just analysis, including: a.

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81. The process undertaken for the Production Right Application is a Scoping and EIA process, not a Basic Assessment process. Appendix 1 to the EIA Regulations 2014, as amended is applicable to a Basic Assessment Process. The Scoping and EIA Process and requirements are indicated in Appendix 2 of the EIA Regulations 2014, as amended. In compliance with the requirements of Appendix 2 of the EIA Regulations 2014 as amended, alternative assessment was undertaken and represented in Section 7 of the Scoping Report while the need and desirability is presented in Section 6 of the Scoping Report. 82. The need and desirability assessment is presented in Section

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Whether the development is needed and desirable in the receiving environment; b. Whether it aligns with local, regional, and national development priorities; c. Whether it promotes equitable outcomes, rather than merely aggregate economic growth; d. Whether alternatives, including the “no-go” option, have been meaningfully considered; and e. Whether the activity contributes to sustainable development, as contemplated in section 24 of the Constitution and section 2 of NEMA. 83 Notably, the Guideline explicitly cautions against abstract or national-level justifications that are disconnected from local social realities. 84 It is submitted that there is an over-reliance on national and global justifications. The Scoping Report motivates the project’s need primarily on the basis of global helium scarcity, strategic importance of helium for high-technology and medical uses; and national energy security considerations. 85 While these arguments may establish macro-level demand, the DFFE Guideline makes clear that need at a national or international scale does not automatically translate into desirability at a local scale. In this case, the project is proposed within; an historically extractive-dependent region with local communities experiencing high unemployment, poverty, and service delivery deficits; and a socio-economic environment already exposed to environmental degradation and economic volatility. 86 The Guideline on Need and Desirability thus necessitates that decision-makers should not only ask “Is this project needed?” but also “Is this project needed here and for whom?” We assert that the Scoping report does not sufficiently answer the latter. 87 Furthermore, according to the DFFE Guideline, need and desirability must be assessed against local and regional planning frameworks, including Integrated Development Plans (IDPs) and spatial development priorities. 88 While the Social Impact Assessment references municipal contexts, it does not meaningfully demonstrate how a capital-intensive gas and helium production project with limited long-term employment potential And high technical barriers to local participation, Advances the development priorities of the receiving communities. 89 These developmental priorities are job-intensive economic activities, livelihood diversification, improved access to basic services and long-term economic resilience. 90 A development that primarily serves external markets and national strategic interests, while offering limited structural benefit to local communities, cannot automatically be regarded as desirable in terms of the Guideline. 91 Furthermore, the DFFE Guideline explicitly links desirability to equitable development outcomes. It cautions against developments where benefits are concentrated among investors or highly skilled workers and costs and risks are disproportionately borne by vulnerable local communities. 92 It is submitted that the proposed project’s employment benefits are likely to be temporary and limited in scale and that skilled positions are unlikely to be filled locally without significant intervention. Communities may experience indirect impacts related to land use, water stress, and cumulative environmental pressure, exacerbating the socio-economic injustice that frequently occurs as a result of extractives operations. 93 The Scoping Report does not adequately assess whether the project contributes to redistributive justice, nor whether it risks reinforcing existing inequalities. From a socio-economic justice lens, a project that extracts finite resources, generates profits largely external to the area and leaves

6 of the Scoping Report. Need and desirability assessment has shown that the development is needed and would be beneficial to the declining gold mining focused local economy of the study area. Furthermore, the District and local municipality development plans show that the proposed development aligns with their priorities. The project alternatives including the no-go option are presented in Section 7 of the Scoping Report. 83 – 85. The Scoping and Specialist Reports clearly states that the mining sector (which is the dominant sector in the Matjhabeng and Masilonyana municipalities) is on a downward trend and many businesses that have traditionally depended on the mining sector have either closed down or are in the process of closing down. Manufacturing aimed at the mining sector also exists in these municipalities. As such, and although limited, the proposed project has the potential to contribute to the local economy. Kindly refer to Row 19 of Table 37 of the Scoping Report where the upliftment of communities and employment is discussed. If the project is done correctly and in line with the mitigations and management measures proposed by the EAP/Specialist, then there are opportunities for positive local benefits. 86. According to the Integrated Resource Plan (IRP) published in October 2025, South Africa will need to significantly expand locally sourced natural gas to meet future energy demands, especially as coal is phased down and renewable integration accelerates. Natural gas is positioned as a transition fuel to complement renewables. Current imports from Mozambique’s Pande-Temane fields will be depleted by 2028, increasing the demand for locally sourced gas to reduce reliance on imports and ensure energy security. Currently, South Africa only has a single approved onshore production right held by Tetra4. In answering whether the project is needed here and for whom, one has to consider the fact that proven gas reserves have been identified in this region, and the natural resources of the country are held in Trust by the government for the benefits of its people. 87. Kindly refer to responses to items 81-85. Kindly also refer to Sections 9.4 of the Scoping Report. 88 – 91. The proposed project does advance the development priorities of the receiving communities, albeit not at a massive scale. It must be noted that the municipalities in question are experiencing a downward trend in their dominant sector further compounding the unemployment rate and poverty issues cited. The proposed project can therefore contribute positively to these aspects. There is also potential in the long-term for local economic stimulation through direct employment for the vulnerable local communities, future business opportunities in the region, royalties and tax revenues. The nature of the development is such that other land-uses and economic activities can in most cases can co-exist. 92. The concern regarding indirect impacts is fully acknowledged. Although the project’s employment benefits are likely to be temporary and limited in scale, the intention is to prioritise locals as much as possible and to undertake skills development during the period of their employment. Refer to the impact assessment in Section 10 of the Scoping Report. The potential impacts related to land-use, water stress and others are identified in the Scoping Report. Both positive and negative impacts have been identified and relevant mitigation measures put forward to reduce negative impacts and enhance positive impacts as far as practicable. Furthermore, detail specialist impact assessments will also be undertaken during the EIA phase to inform the EIA Report. 93 – 94. The

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communities exposed to long-term social and environmental risk raises serious questions regarding its desirability, even if it satisfies market demand. 94 Regarding sustainability and long terms development trajectory, the Guideline requires that need and desirability be assessed in relation to long-term sustainability, including intergenerational equity. Despite the proposed project having an anticipated operational life of approximately 30 years there is limited discussion of economic diversification beyond the project life. Furthermore, the is no clear articulation of how dependency on extractive activity will be avoided as well as insufficient attention to post-closure social outcomes. 95 Given the region’s historical experience with mine closure and economic decline, the absence of a clear long-term social transition strategy undermines the argument that the project is desirable in a sustainable development sense. 96 It must be borne in mind that the DFFE Guideline emphasises that need and desirability must be tested against alternatives, including lternative development pathways and the “no-go” option. While the Scoping Report includes a formal “no-go” discussion, it largely treats this as a procedural requirement rather than a substantive development alternative. 97 Notably absent is a comparison between the proposed project and other potential land uses or economic models that may offer greater employment intensity, lower environmental risk and stronger alignment with local development priorities. 98 Without such comparative analysis, the conclusion that the proposed project is desirable remains unsubstantiated. 99 We assert that when applying the DFFE Need and Desirability Guideline holistically, need has been established primarily at a national and global scale, but not convincingly at a local community level and desirability has been insufficiently demonstrated in relation to equity, sustainability, and long-term socio-economic benefit. 100 The assessment does not adequately address who benefits, who bears the risks, and who decides. The current justification risks reducing “need and desirability” to an economic market argument, contrary to the intent of the Guideline. 101 Accordingly, we submit that the proposed project’s need and desirability remains unproven in terms of the DFFE Guideline and requires substantially deeper interrogation.

concerns raised regarding redistributive justice; potential reinforcement of existing inequalities and long-term sustainability are fully acknowledged. These issues fall squarely within the scope of the EIA phase need and desirability assessment and the full Social Impact Assessment which will be undertaken. This section will be elaborated in in the EIA Report. 95. The concern regarding historical mine closures and associated socio-economic decline is acknowledged. These legacy issues are relevant to assessing long-term sustainability and will be directly addressed in the EIA-phase assessments as mentioned above. 96. In terms of Section 24 of NEMA and EIA Regulations 2014, as amended, the proponent is required to demonstrate that alternatives have been described and investigated in sufficient detail during the EIA process. It is important to highlight that alternatives must be practical, feasible, reasonable and viable to cater for an unbiased approach to the project and in turn to ensure environmental protection. A detailed alternative assessment including the no-go" option is presented in Section 7 of the Scoping Report. Pros and cons were identified in each alternative assessment presented, these will be updated as and where necessary during the EIA Phase. 97 – 98. The proposed project is for gas production and associated activities and not any other land use. It is noted in the Scoping Report that there are renewable energy developments proposed within the Production Right area. The Applicant is in the process of negotiating a coexistence with these developments. Both the renewable energy and the gas sectors contribute to the economy in different ways, and a balanced approach is needed to ensure sustainable growth. South Africa is navigating a path where renewable energy is becoming more prominent while also recognizing the continued importance of mining. The scoping phase outcomes show that there will be limited impact on current land use as the nature and spatial extent of this development is such that it is possible to allow for multiple land uses to co-exist. 99. Kindly refer to responses in items 81- 86. 100. Kindly refer to response in item 69. 101. We respectfully disagree with your assertion in this regard. The proposed plan of study will also ensure that detailed studies put forward gather additional information and knowledge in this regard for presentation in the EIA Phase.

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Public participation 102 Public participation in the environmental impact assessment process is not a procedural formality but a substantive legal requirement. Section 2(4)(f) of NEMA provides that participation of all interested and affected parties in environmental governance must be promoted and that such participation must be equitable and effective. Appendix 2 further requires that scoping must identify interested and affected parties, provide them with an opportunity to comment, and ensure that all relevant issues are raised and considered prior to the impact assessment phase. 103 The test is therefore not whether procedural steps were undertaken, but whether participation was meaningful, inclusive, informed, and capable of

Response

102. The public participation process for the proposed project is being undertaken in accordance with the requirements of the MPRDA and the stipulated requirements in Chapter 6 of NEMA EIA Regulations, 2014 as amended, and in line with the principles of Integrated Environmental Management (IEM). 103. Refer to Section 8 and Appendix C of the Scoping Report. Also refer to the response on item 1 above. 104. The concerns regarding the accessibility of the venue are acknowledged and addressed below. Also kindly refer to the Public Meeting Minutes Appendix C. 105. An invitation to the public meeting was extended to all registered I&APs. Directly affected landowners, land users, and/or NGO’s were also invited. Please can you advise on what you

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influencing the scope and content of the environmental assessment. This is consistent with the constitutional right to procedurally fair administrative action under section of the Constitution and PAJA, which requires that affected persons be given adequate notice, a reasonable opportunity to make representations, and sufficient information to enable meaningful engagement. 104 A public meeting was held at Harmonie Primary School in Virginia. Observations from this meeting raise serious concerns regarding whether participation was meaningful in substance. 105 Attendance at the meeting was limited relative to the size of the receiving community. At approximately 16h00, attendance was recorded at roughly twenty-five individuals in a municipality with a substantially larger population. The composition of attendees consisted primarily of project representatives, consultants and a small number of civil society representatives. There was no clear evidence of broad participation by directly affected residents, land users, or farm-based communities. 106 Concerns were raised regarding accessibility of the venue. The meeting was held at a location not situated on a public transport route and it was noted that alternative venues within nearby residential areas, including Meloding township, may have enabled broader attendance. Accessibility of venue is a recognised component of meaningful participation, as participation cannot be considered effective where physical access barriers materially limit attendance. 107 The adequacy of notice and outreach is further called into question by the fact that individuals working at the meeting venue (a school) indicated that they were unaware of the purpose of the meeting. This suggests that notification may not have been sufficiently localised or effectively communicated to those in the immediate area. 108 While the Public Participation Report records that advertisements, site notices, and multilingual communications were undertaken and that the Draft Scoping Report was made available at libraries and online platforms, procedural compliance with formal notice requirements does not in itself establish meaningful participation. The relevant question is whether affected persons were actually informed and enabled to participate. 109 Statements made during the meeting further raise concern regarding the manner in which participation was conceptualised by the project team. An EAP from EIMS indicated that extensive community participation was not necessary and that attendance at such meetings is typically motivated by employment expectations. It was further indicated that employment opportunities associated with the project would be limited to approximately five to ten positions. 110 This framing is inconsistent with the legal purpose of public participation. Participation is not an employment consultation exercise but a mechanism to ensure environmental governance accountability, transparency, and protection of affected rights. Framing participation primarily in employment terms risks narrowing the scope of engagement and undermining the participatory objectives contemplated by section 2 of NEMA. 111 The technical information presented at the meeting further limited meaningful engagement. The presentation described a large-scale industrial development involving drilling of up to forty-three production wells, construction of extensive gas gathering pipeline infrastructure, and development of a helium recovery and gas processing plant with an

would regard as the receiving communities? With reference to section 3 of the Scoping Report there are no formal settlement areas within, or close to, the proposed application area. The proposed project is located ~15km south east of the town of Virginia, and ~28km south east of the town of Welkom. 106. The concerns regarding the accessibility of the venue are acknowledged. In selecting venue, the EAP aimed to prioritize locations closest to communities or stakeholders likely to be affected by the project. For this particular project, the zone of influence (or area to be affected) is primarily localized around the application area, and no formal towns or settlements are within this zone. The closest main town is Virginia (where the meeting was held). The EAP chose a venue (public school) which was assumed to be central to the town of Virginia the most reasonable and practical location for a broader meeting venue. The EAP also offered to provide an MS Teams link to those community members who cited transport challenges to join and participate virtually. It was however, acknowledged that those in attendance were of the view that future meeting should also be organised in Meloding Township to accommodate those who cannot afford transport, to which the EAP agreed. 107. Your suggestion that individuals working at the meeting venue (a school) were not aware of the purpose of the meeting is unfounded and cannot be substantiated. Communication with the relevant officials at the school regarding the meeting and its purpose was undertaken, to expect all individuals working at the school is also not practical. 108. All reasonable measures were undertaken to inform affected persons of the project and various participation pathways were made available to I&APs. 109 – 110. Your statement that an EAP from EIMS indicated that extensive community participation was not necessary is false. However, it is a fact that I&APs do enquire about the job creation potential of the project. This very question was raised on more than one occasion by different I&APs at the meeting. The nature and scale of the proposed project are such that the employment opportunities will be limited and it is very important to be honest and transparent about this not to create a false impression from the onset. 111. The technical information presented at the meeting was based on the information currently available and baseline studies undertaken. The proposed activity is not regarded as a large-scale industrial development. It was also highlighted that further engagement opportunities would be available particularly at the EIA phase once detailed studies had been undertaken by the EAP and appointed specialists. 112. The Scoping phase environmental risks and impacts were presented together with the preliminary mitigation measures at the public meeting. These are presented in Section 10 of the Scoping Report. Detailed explanation of the proposed Plan of Study is presented Section 12 of the Scoping Report. This includes aspects to be assessed by specialists (i.e. groundwater modelling, air quality dispersion modelling, and monitoring frameworks). Explanation of the outcomes of detailed modelling fall to be presented at a later stage in the EIA process. This was clearly articulated in the meeting. 113. Detailed modelling assumptions will be detailed in the full specialists' assessments to be undertaken. 114. Structured engagements are necessary and appropriate to ensure all stakeholders receive fair opportunity for engagement. Furthermore, participation is not limited to the question-and-answer session in the meeting. It was clearly stated by the EAPs that

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anticipated operational lifespan of approximately thirty years. 112 Despite the scale, duration, and potential permanence of these activities, explanations of environmental risks were limited and lacked technical specificity. While assurances were provided regarding leak prevention and mitigation measures, it was acknowledged that impacts or movements could occur in neighbouring communities. No detailed explanation of groundwater modelling, air quality dispersion modelling, or longterm monitoring frameworks was provided. 113 It was also stated that production volumes could reach several million standard cubic units per day, although lower guaranteed volumes were indicated, and no modelling basis for these projections was provided. Without access to modelling assumptions or environmental impact projections, affected persons cannot reasonably interrogate risk magnitude or consequence. 114 The meeting structure further constrained participation. Participants were required to reserve questions until the conclusion of presentations and to address the meeting through formal microphone use for recording purposes. While administratively structured engagement may be appropriate, such formats may inhibit participation by persons unfamiliar with formal consultation environments, particularly where technical information is presented rapidly. 115 The cumulative effect of limited attendance, venue accessibility constraints, limited participation by directly affected land users, restricted opportunity for interactive engagement, and incomplete disclosure of environmental risk information indicates that the meeting functioned primarily as an information dissemination exercise rather than a participatory deliberative process.

stakeholders were welcome to engage with them through various means even post the Scoping Phase public meeting. 115. We respectfully disagree with this assertion, quite to the contrary, the meeting fulfilled its meaningful participatory objective where the EAP also gained insights that are instrumental to the EIA process from the affected and adjacent community.

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Impacts on cultural heritage 116 The Phase 1 Heritage Impact Assessment (HIA) forming part of the Scoping Report is premature in its conclusion that no significant heritage impacts are anticipated, subject to mitigation as stated in the Executive Summary. The Executive Summary states that a “planned field survey will verify whether the findings of this baseline assessment are accurate or not” (p. vi), notwithstanding this, the conclusion is still reached that “as long as the proposed mitigation measures are implemented there should be no significant heritage impacts” (p. vi). Given that the assessment is expressly based on a desktop study, with field verification still pending (pp. 28–29), it is procedurally inappropriate to reach impact conclusions at this stage. At scoping phase, the purpose of the assessment is to identify the full extent of potential heritage sensitivities and determine whether any fatal flaws may arise. Reaching impact findings prior to completion of the field survey undermines the precautionary principle in section 2 of the National Environmental Management Act, 1998 (Act 107 of 1998). 117 The desktop assessment identifies twelve distinct heritage features which may potentially be impacted, including burial grounds or graves, historical period remains, farmstead structures

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116. We acknowledge your comments on the cultural heritage and the baseline Heritage Impact Assessment. The findings and preliminary conclusions of the Scoping Phase reports are by no means the conclusion of the studies, assessments and where necessary, refinements of the reports will be done in the subsequent EIA Phase. The Baseline Heritage Impact Assessment also states that observations made in the Scoping Report will be further elaborated on through the full Heritage Impact Assessment including a field survey. 117. A full Heritage Impact Assessment including a field survey will be undertaken in the EIA Phase. Intangible heritage aspects can properly be assessed when on site and through engagement with affected communities. Where potential disturbances / impacts to heritage features is identified the specialist will propose suitable mitigation measures in line with the requirements of the National Heritage Resources Act. As previously mentioned, meaningful consultation with affected families, living descendants and communities will also be conducted by the Social Impact specialist. 118 – 119. Although the application area for the Production Right is approximately 14 440 hectares, this must not be confused with the development footprint which will be significantly less in extent (i.e. less than 50

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and a potential Iron Age or historical settlement (p. vi). The report further acknowledges the presence of graves and historical structures along proposed transects or intersections. In terms of section 36 of the National Heritage Resources Act, 1999 (Act 25 of 1999) (NHRA), graves and burial grounds are afforded specific statutory protection. The report fails to identify intangible heritage aspects. Any disturbance requires authorisation from the relevant heritage authority and meaningful consultation with affected families and communities. The Scoping Report does not demonstrate how potentially affected living descendants, traditional leaders, or knowledge holders will be identified and engaged should graves be confirmed within the development footprint. The absence of a transparent consultation framework at this stage constitutes a material procedural gap. 118 While the methodology outlines the use of the Department of Forestry, Fisheries and the Environment Screening Tool, the South African Heritage Resources Information System and historic mapping (p. 28), it confirms that the field survey is still “planned” (p. 28). Yet the development footprint is extensive, covering approximately 14 440 hectares and including up to 43 production wells, pipelines, a helium recovery and gas processing plant, and associated infrastructure (p. 1; p. vi). The scale and permanence of the proposed Production Right significantly exceed earlier exploration activities referenced in the report (pp. 23–24). Reliance on previous Heritage Impact Assessments conducted for adjacent projects cannot substitute for a comprehensive and independent assessment of the entire Production Right footprint, particularly where cumulative landscape impacts may arise. 119 The report provides an extensive archaeological background to South Africa and the Free State Province (pp. 5–21), including references to Early Human Evolutionary Evidence at Florisbad (p. 21) and Iron Age stone wall structures across the province (pp. 22–23). However, comparatively limited attention is given to the broader definition of heritage resources under the National Heritage Resources Act, which includes cultural landscapes, places of social memory, and sites of historical significance. The report itself acknowledges the historical layering of the Free State landscape, including Anglo-Boer War refugee camps such as Springfontein (p. 20) and mining-era developments in Welkom, Virginia and Hennenman (pp. 22–23). At scoping stage, the assessment should more clearly interrogate whether the proposed industrial expansion may affect landscape-level heritage values, including associative and intangible heritage linked to farming complexes, historical settlement patterns and burial sites. 120 In addition, although the Terms of Reference provided to the assessment practitioner require the identification of sites within and in close proximity to the development footprint and comment on impacts (p. 2), the approach adopted in the report risks permitting infrastructure siting decisions to proceed before verified heritage constraints. The methodology confirms that track logs will only be recorded during the planned field survey (p. 28), and that documentation and analysis of larger finds will follow field verification (p. 28–29). Without confirmed delineation of sensitive areas prior to detailed project design, there is a risk that avoidance and minimisation principles — which are central to integrated environmental management under the National Environmental Management Act — will not meaningfully inform layout planning. 121 In light

ha). As such, a sensitivity approach will be followed, where impacts are avoidable this will be considered as a primary option. And as mentioned above, intangible heritage aspects such as those mentioned here can properly be assessed when on site and through engagement with affected communities. Full Heritage and Social Impact Assessments including field surveys will be undertaken in the EIA Phase. 120. A full Heritage Impact Assessment including a field survey will be undertaken in the EIA Phase. The adopted approach will consider a corridor (500m) assessment approach which will feed into the sensitivity planning approach. Thus, allowing detailed project design to take place within the assessed and approved corridors. 121. We acknowledge that a baseline Heritage Impact Assessment cannot yet be regarded as sufficiently robust to support informed decision-making in terms of the complete heritage features and associated impacts. It is however in the EAPs opinion adequate to meet the purpose of environmental scoping. A full Heritage Impact Assessment including a field survey will be undertaken in the EIA Phase and this will present a detailed impact identification, assessment and mitigation plan. 122. Statement noted. It is the EAPS opinion that potential impacts on formal and informal rights have been identified in the Scoping process. Please provide more specific details on the significant proportion of affected persons you are referring to? 123. EIMS undertook a comprehensive public notification process to inform stakeholders of this opportunity and responsibility to register. Regulation 42 of the EIA Regulations requires the opening and maintaining of a database of I&AP’s who submit written comments, attended meetings, requested to be registered- this was done. The process did not exclude any informal land rights holders, including farmworkers residing on farms, labour tenants, grazing users, and other non-title holding land users, from registering on the database, and consequently participating in the process All registered landowners of affected properties were consulted and requested to advise if there were additional occupiers that needed to be contacted. Furthermore, site notices and posters were placed at public areas in and around the proposed project area in order for all occupiers including non-title holders to be notified of the application. 126. Kindly refer to response to item 124 and 125 above. EIMS undertook a comprehensive public notification process to inform stakeholders of this opportunity and responsibility to register. Regulation 42 of the EIA Regulations requires the opening and maintaining of a database of I&AP’s who submit written comments, attended meetings, requested to be registered- this was done. The process did not exclude any local communities, or persons impacted by the project, from registering on the database, and consequently participating in the process. 127. The impact on agricultural land and use has been identified, refer to row 1 on table 37. The state of the crop fields as well as the soils present within the study area will need to be confirmed following a site visit. A detailed Agricultural Impact Assessment will be undertaken during the EIA Phase to assess these and other related agricultural risks. An agricultural specialist will undertake the identification and classification of soils within the study area as well as suitable mitigation and recommendations during the EIA Phase. 128. This EIA process is being undertaken in accordance with the requirements of the NEMA and the stipulated requirements in Section 2(4)(a). 129 – 130. The

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of the above, the Heritage Impact Assessment cannot yet be regarded as sufficiently robust to support informed decisionmaking at scoping stage. The identification of graves, historical structures and settlement remains (p. vi; pp. 32–34), combined with the absence of completed field verification (p. 28), and the failure to identify intangible heritage aspects, indicates that heritage impacts remain uncertain and potentially significant. A comprehensive field survey, strict compliance with section 36 of the National Heritage Resources Act in relation to graves, and transparent documentation of consultation processes must precede any definitive impact conclusions in the Environmental Impact Assessment phase. Participation of informal land rights holders 122 The proposed Production Right area covers extensive agricultural land and rural settlements. It is reasonably foreseeable that a significant proportion of affected persons do not hold registered title but occupy land or use resources through informal, labour, tenancy, grazing, or customary arrangements. 123 Section 2(4)(d) of NEMA requires that vulnerable and disadvantaged persons must be given due consideration in environmental governance. Meaningful participation therefore requires specific and targeted engagement with informal land rights holders, including farmworkers residing on farms, labour tenants, grazing users, and other non-title holding land users. 124 While the PPR states that landowners and occupiers were notified and invited to register as I&APs, it does not disclose how occupiers were identified, how they were contacted independently of landowners, or what proportion of notifications were directed to non-title holders. 125 This is a material deficiency. Production activities (including well pads, pipelines, and processing facilities) have the potential to restrict access to land, interfere with livelihood practices, and alter land use patterns over extended periods. Persons who rely on land for residence or livelihood but who lack registered title are therefore among those most likely to experience direct impacts. 126 Where participation is mediated primarily through landowners, the process risks excluding persons whose rights and interests are distinct from those of landowners. Such exclusion would undermine the equity requirement in section 2 of NEMA and may render the process procedurally unfair under PAJA. Impacts on food security (agriculture) and tourism 127 The proposed Production Right is situated within an agricultural receiving environment characterised by active farming operations, grazing land, and rural settlement patterns. The development of production wells, pipeline networks, and processing infrastructure introduces risks to soil integrity, land capability, water availability, and agricultural productivity. 127. The impact on agricultural land and use has been identified, refer to row 1 on table 37. The state of the crop fields as well as the soils present within the study area will need to be confirmed following a site visit. A detailed Agricultural Impact Assessment will be undertaken during the EIA Phase to assess these and other related agricultural risks. An agricultural specialist will undertake the identification and classification of soils within the study area as well as suitable mitigation and recommendations during the EIA Phase. 128 Section 2(4)(a) of NEMA requires that development must be socially, environmentally, and economically sustainable, and that disturbance of ecosystems and loss of biological diversity must be avoided or minimised. Sustainable development includes

Scoping Report also highlights the fact that a large portion of the infrastructure will be placed below ground and will allow existing agricultural practices to continue. It is not anticipated that the footprint will include extensive industrial infrastructure (refer to Table 11 in Section 5.1.3.2 as well as Table 13 of the Scoping Report. The identification and assessment of the full range of agricultural and food security risks and pathways will be done by the Soils and Agricultural Impact Assessment which will be undertaken during the EIA Phase. 131. The degree of the linkage between surface and groundwater will be assessed in the EIA Phase by the Hydrogeological Assessment and measures to mitigate identified impacts will be put forward for inclusion in the EMPr and implementation during the project activities. 132. A full Social Impact Assessment which will assess the social impacts of the project including identifying whether tourism receptors exist will be undertaken in the EIA Phase. The Free State Department of Economic, Small Business Development, Tourism and Environmental Affairs has also been identified as a key I&AP and their comments on the study will be considered accordingly. 133 – 136. Your opinion in this case is not supported by any evidence. There are laws, policies guidelines and process which inform oil and gas operations to ensure compliance environmental laws and licenses. One of the mechanisms to ensure compliance of oil and gas operations is the enforcement of the EA and EMPr conditions which amongst many others, requires independent compliance monitoring and reporting requirements to the competent authority. The EMPr will be compiled and made available to I&APs during the public review and commenting period in the EIA Phase. The performance of government does not fall within the scope of an EIA. Please utilise the correct communication channels, forums, and mechanisms to raise your concerns. 137 – 138. We acknowledge your objections and comments received. Please be advised that a verbatim copy of your comments, as received, and our corresponding responses will be integrated into the Public Participation Report and subsequently presented to the Competent Authority for their consideration. Many thanks for your consideration of the Scoping Report, and your participation in the process.

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protection of natural resources upon which livelihoods and food systems depend. 128. This EIA process is being undertaken in accordance with the requirements of the NEMA and the stipulated requirements in Section 2(4)(a). 129 The Scoping Report acknowledges that the project footprint will include extensive industrial infrastructure across agricultural land. 129 – 130. The Scoping Report also highlights the fact that a large portion of the infrastructure will be placed below ground and will allow existing agricultural. However, the scoping phase must identify and define the full range of agricultural and food security risk pathways to ensure that the EIA is appropriately scoped. 130 The risk pathways include at minimum: a. Permanent and temporary loss of productive agricultural land due to infrastructure footprint and servitudes b. Fragmentation of farming units and disruption of access routes c. Soil compaction and erosion associated with construction and heavy vehicle movement d. Contamination risks associated with drilling operations and potential leaks e. Impacts on irrigation and livestock water supply through groundwater and surface water interaction f. Air emissions and dust deposition affecting crop health and grazing quality. 131 The receiving environment is water constrained and subject to climate variability. As acknowledged in the Scoping Report, groundwater and surface water systems are interconnected and support wetlands and river ecosystems within the study area. Any disruption to groundwater quality or availability therefore has direct implications for agricultural productivity and ecosystem function. 132 Tourism and landscape value must also be considered where relevant. Industrialisation of rural landscapes through well fields, pipeline corridors, and processing facilities may alter visual amenity, reduce landscape integrity and affect tourism-related economic activity. The scoping phase must identify whether tourism receptors exist and whether such impacts will be assessed. Lack of capacity to ensure compliance, monitoring and enforcement 133 We assert that South Africa does not have the capacity to adequately ensure that oil and gas operations are compliant with environmental laws and licenses. 133 – 136. Your opinion in this case is not supported by any evidence. There are laws, policies guidelines and process which inform oil and gas operations to ensure compliance environmental laws and licenses. One of the mechanisms to ensure compliance of oil and gas operations is the enforcement of the EA and EMPr conditions which amongst many others, requires independent 134 Compliance, monitoring and enforcement is a crucial check in the environmental legal framework. The DMRE, and PASA as the designated agency, holds the mandate to recommend the granting of EAs and to undertake monitoring, enforcement and compliance at oil and gas operations. This is conducted through Environmental Mineral Resource Inspectors. 135 There are 94 designated EMRIs in South Africa, with all 94 being designated for mining, and none being designated for the oil and gas sector. Furthermore, the regulator and designated agency, PASA, only has one office which is situated in Cape Town. There are no regional offices in the regions which are most impacted by gas operations. 136 It is argued that neither the DMRE nor PASA have the capacity to ensure the fulfillment of their legislative obligations to ensure that oil and gas operations are compliant with the law and that there is enforcement where there is non-compliance. Conclusion 137 We thank you for the

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opportunity to submit these objections and trust that the concerns raised herein will be addressed. 138 Thanking you.

Mr Lekota

Date 2026/02/27 Method Email

Comment

1. Dear Mr Mahlangu, The Directorate: Biodiversity Conservation has reviewed and evaluated the reports received and does not have any objection to the draft Scoping Report and the Plan of Study for the proposed helium and methane gas production activities within the Motuoane Production Right (PR) area. The proposed development includes 43 production wells, gas gathering pipelines, gas processing facilities, access roads, and associated infrastructure, with an anticipated operational lifespan of approximately 30 years. 2. The study area overlaps with Critical Biodiversity Areas (CBA 1 and 2), Ecological Support Areas (ESA 1 and 2), Other Natural Areas (ONAs), and NPAES Priority Focus Areas. The vegetation types present include Vaal-Vet Sandy Grassland (Endangered), Central Free State Grassland (Vulnerable), Highveld Alluvia Vegetation (Near Threatened), and Bloemfontein Karroid Shrubland (Least Threatened). This vegetation types are of conservation concern due to historical transformation pressures and their importance in meeting provincial and national biodiversity conservation targets. 3. The proximity of private nature reserves further elevates the ecological sensitivity of the receiving environment. The study area further overlaps with NPAES Priority Focus Areas and is in proximity to several private nature reserves. These features indicate a receiving environment of high ecological sensitivity. Although no floral Species of Conservation Concern (SCC) have been confirmed, the potential occurrence of faunal SCC (amphibians, reptiles, mammals, and avifauna) is acknowledged. 4. The development footprint must avoid the highly sensitive areas to prevent the loss and fragmentation of vegetation communities and the high biodiversity areas in the vicinity of the study area. 5. The presence of wetlands, river ecosystems (including CR river lines), and multiple quaternary catchments within the Vaal Water Management Area increases the ecological sensitivity of the area. Surface water and groundwater systems in the study area are hydrologically linked through alluvial aquifers and hyporheic zones, making aquatic ecosystems particularly vulnerable to groundwater abstraction and contamination. Obtain comments from the Department of Water and Sanitation (DWS) must be added to the key stakeholder list. 6. Furthermore, the project area is underlain by a minor aquifer system (Upper Karoo fractured aquifer) which, although of limited yield, is locally important for baseflow contribution to rivers, wetlands, and local water supply. The shallow intergranular aquifer system (20–30 m thick) and fractured rock aquifer are sensitive to contamination and dewatering due to their limited storage capacity, shallow water table in places, and direct

Response

1. It should be noted that Mr Mahlangu has since left EIMS and replaced by Mr Vukosi Mabunda as the EAP on this application. The EAP thanks the Directorate: Biodiversity Conservation for its review of the Draft Scoping Report and for confirming that it does not object to the proposed Plan of Study for EIA. The issues raised have been fully considered during the EIA phase and have informed the scope and focus of the specialist investigations undertaken for the proposed Production Right application. The Draft EIAr includes dedicated specialist assessments for terrestrial biodiversity, wetlands and aquatic ecology, hydrogeology, hydrology, agricultural resources, social impacts, air quality, noise, climate change, heritage resources and quantitative risk assessment. These specialist studies have been integrated into the impact assessment and project design process. These are detailed in Sections 8 and 9 of the EIAr as well as Specialist Reports included in Appendices F1 to F13 2. The comment is noted and concurred with. The Terrestrial Biodiversity Impact Assessment confirmed that portions of the Production Right area overlap with CBA 1, CBA 2, ESA 1, ESA 2, Other Natural Areas and NPAES Priority Focus Areas. These features are discussed in Sections 4.3.3, 8.9.1, 8.9.2 and 8.9.3 of the EIAr and illustrated in Figures 17, 62 and 63. The Terrestrial Biodiversity Impact Assessment further confirmed that the project area overlaps the Vaal-Vet Sandy Grassland (Endangered), Central Free State Grassland, Highveld Alluvial Vegetation and Winburg Grassy Shrubland vegetation types, as illustrated in Figure 64 and discussed in Section 8.9.4. Notwithstanding the regional biodiversity importance, detailed habitat mapping identified substantial portions of the proposed infrastructure corridors within modified agricultural land and lower sensitivity habitat units. Sensitive habitat features and biodiversity constraints were incorporated into the project's sensitivity mapping and layout refinement process. The final preferred layout was selected specifically to minimise direct impacts on sensitive terrestrial biodiversity resources and ecological corridors. These are indicated in Figures 67, 68, 69, 155 and 156 and Sections 8.9 and 10 of the EIAr. 3. The comment is acknowledged. The biodiversity assessment identified several private conservation areas within the broader receiving environment, including H.J. Joel Private Nature Reserve, Tara Wildlife Safaris and LM Safaris Nature Reserve. These protected and conservation areas are discussed in Section 8.9.2 and illustrated in Figure 62 of the EIAr. The terrestrial biodiversity assessment identified no confirmed floral Species of Conservation Concern (SCC) within the proposed development footprint during field investigations. However, the potential occurrence of faunal

Comments and Responses 1709 Motuoane Production Right EIA

Mr Lekota

connectivity to surface water systems, particularly within floodplains and drainage lines. 7. The Directorate raises concern regarding the cumulative and long-term risks associated with drilling activities, well maintenance, gas extraction, and associated infrastructure on groundwater quality and aquifer integrity. Potential impacts include contamination from drilling fluids, hydrocarbons, well casing failures, surface spills, and improper waste management; changes to groundwater flow regimes; and potential drawdown effects that may affect baseflow contributions to rivers and wetlands. Given the longevity of the project and the density of proposed wells along fault lines, there is an increased risk of preferential contaminant migration along geological structures and fractures, which may result in indirect impacts on aquatic ecosystems and sensitive biodiversity feature. 8. You are advised to assess cumulative impacts of multiple wells and long-term operations on terrestrial habitats, wetlands, rivers, groundwater-dependent ecosystems, and faunal populations. 9. Public Participation Process documents related to Biodiversity EIA for review and queries should be submitted to the Directorate: Biodiversity Conservation at Email; *** for the attention of Mr. Seoka Lekota. Yours faithfully Mr Seoka Lekota Control Biodiversity Officer Grade B Directorate: Biodiversity Conservation Department of Forestry, Fisheries & the Environment Date: 23/02/2026

SCC, particularly avifauna, mammals, reptiles and amphibians associated with grassland, wetland and riparian habitats, was recognised and assessed. In addition, habitat units associated with drainage features, wetlands, alluvial vegetation and intact grassland were identified as potentially supporting species of conservation concern. These findings are discussed in Section 8.9 and Appendix F13. Mitigation measures including avoidance of sensitive habitats, ecological walkdowns prior to construction, limiting disturbance footprints and rehabilitation of temporarily disturbed areas have been incorporated into the EMPr and impact assessment. These are detailed in Sections 9.3.11 to 9.3.13 and Appendix H of the EIAr. 4. Avoidance of highly sensitive environmental features has formed a key design principle during the EIA phase. A sensitivity-based planning approach was adopted whereby biodiversity, wetland, hydrological, agricultural, social and heritage constraints were integrated into a composite sensitivity analysis. Reference can be made to Chapter 10 and Figures 155 to 158 of the EIAr. The preferred production corridors and infrastructure layout were refined using specialist inputs to minimise encroachment into highly sensitive biodiversity features, wetlands, riparian corridors, CBA areas and agricultural resources. Infrastructure micro-siting will further be informed through pre-construction environmental verification and ECO oversight before construction commences. Reference can be made to Sections 6, 10 and 12.4 of the EIAr. Furthermore, no-go areas, wetland buffers, drainage line setbacks and biodiversity management requirements have been incorporated into the EMPr to ensure that direct habitat loss and fragmentation are minimised to the greatest extent practicable. 5. The Aquatic, Hydrological and Hydrogeological specialist investigations confirmed that the project area falls within the Vaal Water Management Area and overlaps quaternary catchments C42G, C42H and C42K. Refer to Section 8.10.1 and Figure 71. The study identified multiple wetlands, riparian systems and Critical River ecosystems, including NFEPA river systems and CR river reaches. Forty-two wetland HGM units were delineated and assessed. Reference can be made to Sections 8.10.2 to 8.10.6 and Figures 72, 73 and 74. The Hydrogeological Assessment also confirms the hydraulic interaction between groundwater and surface water systems, particularly within alluvial aquifers and riparian zones. This relationship is described in Section 8.11.4 of the EIAr, where the report notes that groundwater contributes baseflow to local drainage systems and that alluvial aquifers may be directly connected to surface water resources, especially during high-flow conditions. The Department of Water and Sanitation has been identified as a key commenting authority. The EIAr further confirms that applicable water use authorisations and DWS consultation will be undertaken through the separate water use authorisation process where required. Reference can be made to Section 4.1.9 of the EIAr. 6. The comment is acknowledged and supported by the findings of the Hydrogeological Impact Assessment. Section 8.11 of the EIAr identifies three principal hydrostratigraphic units, namely a shallow quaternary aquifer, a shallow intergranular and fractured aquifer, and a deeper fractured aquifer. The report specifically notes that the shallow intergranular and fractured aquifer is more susceptible to contamination due to its hydraulic characteristics and connectivity to near-surface processes. Reference can be made to Sections 8.11.2 and 8.11.4 of the EIAr. Potential

contamination pathways and groundwater risks were evaluated in detail through numerical groundwater flow and contaminant transport modelling, including assessment of saline groundwater migration and methane migration scenarios. Reference can be made to Sections 8.11.9 and 9.3.8, as well as Figures 116 to 126 of the EIAr. The project design incorporates fully cased and cemented wells, cement bond logging verification, above-ground contained drilling fluid management systems, spill prevention controls, secondary containment, ongoing monitoring and proper well abandonment procedures to minimise groundwater contamination risks. Reference can be made to Sections 3.1.3, 8.11 and 9.3.8 of the EIAr. 7. The concern is acknowledged and was specifically addressed during impact assessment of the EIAr. The impact assessment evaluated both direct and cumulative groundwater risks associated with drilling, production operations, well integrity failure scenarios, contaminant migration, surface spills, waste management and long-term operational activities. Numerical groundwater flow and contaminant transport modelling was undertaken to assess worst-case contaminant migration scenarios involving saline groundwater and methane migration from deeper geological formations. Reference can be made to Sections 8.11.9 and 9.3.8 and Figures 116 to 126 of the EIAr. The assessment concluded that the principal risk mechanism would be associated with failure of primary engineering controls such as casing and cement barriers. Consequently, the project includes multiple layers of engineering protection, including steel casing, cement isolation barriers, pressure testing, ongoing well monitoring, cement bond logs and eventual plugging and abandonment in accordance with industry standards. Reference can be made to Sections 3.1.3 and 9.3.8 of the EIAr. In addition, drilling fluids and wastewater will be stored in contained systems, hazardous waste will be removed from site by licensed contractors, and groundwater monitoring is included as part of the proposed environmental management framework. 8. The recommendation is supported and has been incorporated into the EIAr. Cumulative impacts were considered by all relevant specialist disciplines, including terrestrial biodiversity, wetlands, groundwater, hydrology, air quality, climate change, noise and social impacts. The impact assessment evaluates the combined effect of multiple production wells, gathering pipelines, access roads, gas processing infrastructure and associated activities over the anticipated operational lifespan of the project. Reference can be made to Chapter 9 and the specialist studies contained in Appendices F1 to F13 of the EIAr. The aquatic and wetland assessment specifically considered cumulative impacts on wetlands, river ecosystems, ecological connectivity and freshwater ecosystem functioning. The hydrogeological assessment considered cumulative groundwater abstraction and contaminant migration scenarios associated with multiple production wells and long-term production activities. Reference can be made to Sections 8.10, 8.11, 9.3.8, 9.3.9 of the EIAr and applicable cumulative impact sections within the specialist reports. In addition, biodiversity-related cumulative impacts on habitat fragmentation, faunal movement, ecological corridors and ecosystem functioning were assessed and mitigation measures developed accordingly. The overall sensitivity-based design approach and progressive rehabilitation commitments are intended to minimise residual cumulative impacts over the life of

Comments and Responses 1709 Motuoane Production Right EIA

Mr Lekota

the project. Reference can be made to Sections 9.3.11, 9.3.12, 9.3.13 and Chapter 10 of the EIAr. 9. The comment is noted. The Directorate: Biodiversity Conservation will remain registered on the project database as a key stakeholder and commenting authority. Biodiversity-related documentation, including the EIAr, Terrestrial Biodiversity Assessment, Aquatic and Wetland Assessment and associated Environmental Management Programme, will continue to be made available to the Directorate in accordance with the requirements of the EIA Regulations and public participation process. The comment and response will also be captured within the Final Issues and Responses Report accompanying the Final EIAr submission to the Competent Authority. These comments and responses will be included in the Draft EIAr Public Issues and Responses Report (Comments and Responses Report) which will be made available for public review. They will also be attached to the Final EIAr for submission to the Competent Authority for consideration. We hope the concerns have been addressed. Kind Regards ,

Ms Natasha Thomas

Date 2026/01/28 Method Email

Comment

Dear Sir/Ma'am Kindly assist. I cannot download the Baseline Specialist Report. I get the following message. Thanking you in advance.

Response

Good day ***, Apologies for the delay in response, it seems the previous email failed to send due to the size. The issue has been resolved on the website, thank you for bringing it to our attention. Please find attached the link to the working folder 1709 Motuoane Production Right EIA – EIMS. We hope there was no delay caused.

Vhukhudo

Date 2026/02/10 Method Email

Comment

I hope this message finds you well. Please note that our IT security restrictions prevent us from accessing the link provided. Kindly send the report as an attachment, preferably in PDF. please clearly indicate the submission due date for comments on the proposed project on the body of the email. Regards,

Response

Good day Vhakhido, Please find attached the Scoping Report as requested. The appendices are too large to attach to this email. Please try accessing our website through the web for all the required documentation. It is www.eims.co.za/public-participation/ the project folder in 1709 Motuoane production right EIA. The period for public review and comment for the scoping phase concludes on the 23rd of February 2026.

Date 2026/02/24 Method Email

Comment

Good day, I hope this message finds you well. Please note that our IT security restrictions

Response

Hi Vhukhudo, Thank you for your email. As mentioned in the previous email, the file is too large

Comments and Responses 1709 Motuoane Production Right EIA

Vhukhudo

prevent us from accessing the link provided. Kindly send the report as an attachment, preferably in PDF format. Your assistance will be appreciated. Regards,

to share via email. It there an alternative we can use to forward you a copy of the report?

Ria

Date 2026/02/02 Method Email

Comment

Good day Due to phising attacks on my computer, SANRAL blocked my computer from accessing any website, dropboxes etc. Please attached application together with motivational memorandum, A4 locality maps and GPS co-ordinates to your email as send it to nrstat@nra.co.za or hand deliver to 38 Ida street, Menlo Park, Pretoria, 0081, to SANRAL's offices. Kind regards,

Response

Good day Ria, Thank you for your email. Please note that the aforementioned email address was already notified. Should there be anything further, please do not hesitate to contact us.

Thami Hadebe

Date 2025/11/20 Method Email

Comment

Dear Sir/Madam Your wayleave application with project reference number 1709/SK/am dated 19 November 2025 has reference. Transnet Pipelines, a division of Transnet SOC Limited, is not affected by the proposal. Your awareness of the existence of Transnet's pipeline servitudes and concern for their integrity is highly appreciated. This authorisation shall be valid for 48 months from the date – 20 November 2025. Yours Sincerely,

Response

Good day ***, Thank you for your email. The response has been noted.

Elmar Roberg

Date 2025/11/21 Method Email

Comment

Hi Please add me to the list.

Response

Good day ***, This message serves as a confirmation that your emails has been received, and your request has been noted. You have been added to our database, and you will receive all further communication about this project.

Date 2026/02/19 Method Email

Comment

Hi Thanks for the meeting yesterday. Had to leave before you completed, and hope that it did

Response

Hi Elmar, Thank you for your email. And thank you for attending the bit of the presentation that

Comments and Responses 1709 Motuoane Production Right EIA

Elmar Roberg

not become awkward. Can you please send me the presentation, as well as .kml files for the areas being explored. Much appreciated, thank you!

you were able to stay for. Please find attached the documents as requested. For anything further, please do not hesitate to contact us.

Date 2026/02/19 **Method** Email

Comment

Hi Thanks for the meeting yesterday. Had to leave before you completed, and hope that it did not become awkward. Can you please send me the presentation, as well as .kml files for the areas being explored. Much appreciated, thank you!

Response

Thank you for the quick response.

Date 2026/02/19 **Method** Email

Comment

Could you also provide the kml for the the Expl Right that this is a part of? Thank you.

Response

Hi Elmar, Please find attached as requested.

Date 2026/02/20 **Method** Email

Comment

thank you very much. I am trying to understand how this fits in with the black outline that you showed in the locality map in the presentation. Could you send me that kmz as well, please. Are there also any other rights that Moatuoane has in the Free State? If so, then please provide the kmz. Thanks, apologise for being such a pain.

Response

Good day Elmar, Please find attached the requested locality map.

Lenong

Date 2025/11/19 **Method** Email

Comment

Good afternoon, My Leaders, CP, this matter was received in this office, this afternoon. The author has been requested to stop sending such information to the DG's office. If they do have my contacts because I deal with them on a daily basis.

Response

Good day ***, This email refers to the email below. Please indicate if you need this email to be delisted from our database.

Date 2025/11/19 **Method** Email

Comment

Good afternoon, My Leaders, CP, this matter was received in this office, this afternoon. The author has been requested to stop sending such information to the DG's office. If they do have my contacts because I deal with them on a daily basis.

Response

Good morning, No, just send all Free State notifications to me! That is all I'm asking for.

Comments and Responses 1709 Motuoane Production Right EIA

Lenong

Maite Makhura

Date 2025/11/28 Method Email

Comment

Good day, I will like to register as an interested and affected party for the notification below: NOTIFICATION REGARDING OPPORTUNITY TO PARTICIPATE IN THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS AS PART OF THE MOTUOANE PRODUCTION RIGHT APPLICATION, WITHIN VARIOUS FARMS IN MATJHABENG AND MASILONYANA LOCAL MUNICIPALITIES, LEJWELEPUTSWA DISTRICT MUNICIPALITY, FREE STATE PROVINCE, SOUTH AFRICA. Hope you will find all in order regards.

Response

Good day ***, Thank you for your email, please note that you have been added onto our database, and you will be receiving all further communication regarding this proposed project. Please do not hesitate to contact us should you have any concerns and/or queries.

Ms Nthabiseng Mahlumba

Date 2026/02/13 Method Email

Comment

Good morning, *** from MACUA (MININGAFFECTEDCOMMUNITIESUNITEDINACTION), I hope this message finds you well. I'm following up regarding logistics for community members attending the public meeting. Specifically, are arrangements being made to provide transport for individuals residing in the location? If not, would it be possible to consider hosting the meeting at the location to ensure broader community participation? Looking forward to your response. Best regards,

Response

Good Day *** Thank you for your continued interest in the project. We acknowledge your concerns regarding the choice of venue for the public meeting and the potential transport constraints that might prevent some community members from attending. In selecting venues, we aim to prioritize locations closest to communities or stakeholders likely to be affected by the project. For this particular project, the zone of influence (or area to be affected) is primarily localized around the application area, and no formal towns or settlements are within this zone. The closest main town is Virginia (where the meeting currently scheduled to be held). According to the Scoping Report, it is unlikely that communities beyond the application area will be significantly affected. Based on this evaluation, we determined that Virginia would be the most reasonable and practical location for a broader meeting venue. However, we understand the importance of a reasonable and inclusive public participation process, especially for communities disadvantaged by distance and cost. We are keen to receive input from all interested parties and to facilitate meaningful participation through reasonable and practical alternatives. In this regard, we would like to direct you and other community members to the venues and platforms available for reviewing the report and other communication channels you can utilize to ask questions and receive responses (emails, telephone calls, etc.). Additionally, there is a data-free site available for communities to access the reports without incurring data costs (<https://www.eims.co.za/2025/11/06/1709-motuoane-production-right-eia/>). Unfortunately, we are not in a position to arrange transport for attendees. Providing transport could create liability

Comments and Responses 1709 Motuoane Production Right EIA

Ms Nthabiseng Mahlumba

and safety responsibilities that the Applicant and EAP cannot manage fairly or consistently for all stakeholders. However, we can offer to provide an MS Teams link for community members to join and participate virtually in the meeting tomorrow. Please let me know by 9am tomorrow if this would be useful to you. Just a reminder that this is currently the Scoping Phase of the project and there are still future opportunities for engagements (i.e. the EIA Phase). We are open to improving accessibility for the future EIA phase. If you can propose a suitable community hall or church venue, we will assess whether this can be accommodated in the EIA Phase. We would like to remind you that if you have any comments on the Scoping Report that you want us to include in the final submission, please submit them by the deadline of 23 February 2026, as indicated in the notification of the Scoping Report availability.

Mr Taole Mavious Mokhele

Date 2026/01/23 Method Email

Comment

Good morning *** 1709 Motuoane Production Right EIA We hope this email finds you well, as Goldfields Community Forum, which exists in Matjhabeng and Masilonyana Municipality. We would like to register for participation. May you please assist us with the downloaded Scoping report of the Motuoane Production Right. Why is your Scoping report available in towns, what about township libraries? We hope to hear from you as soon as possible, Kind regards,

Response

Hi ***, Our sincerest apologies for the delay in response. Please note that you have been added onto our database and you will receive all proposed project related notifications from this point going forward. In terms of libraries, we use the libraries that we believe are closest to the proposed project area and are universally accessible to all I&APs. We would however appreciate any and all suggestions on more suitable venues/locations if you have them in mind. Your request for a physical copy of the scoping report has been forwarded to the project manager, and we will get back to you as soon as we have a response. For now, please find attached the electronic folder for the proposed project 1709 Motuoane Production Right EIA – EIMS. You can find all relevant documentation under this folder. For any further assistance and/or comments, please do not hesitate to contact us.

Date 2026/01/30 Method Email

Comment

Thank you for the feedback. I understand the issue of libraries but even at Virginia township, Welkom, Thabong Library and Thinessun community library our members could not find the physical report and these town's are closest to the proposed project area. Kind regards,

Response

Hi ***, As our earlier telephone conversation refers, please find attached response from the project manager: Good Day Taole Thank you for your continued interest in the above-mentioned project. Although it is difficult for us to provide hard copies for everyone, we acknowledge your concern and we have made arrangement to place additional hard copies at the following venues in the townships (Thabong Public Library, Meloding Library and Theunissen Public Library). We would also like to draw your attention to the fact that we do have a data free website (1709 Motuoane Production Right EIA – EIMS) where anyone with a phone can login and access the reports. Please do not hesitate to contact us should you have any queries and/or concerns.

Comments and Responses 1709 Motuoane Production Right EIA

Mr Taole Mavious Mokhele

-----As discussed earlier on the phone, could you please provide us with addresses and working contact details for the following: • Meloding Library • Thabong Public Library • Theunissen Public Library Your assistance is greatly appreciated.

Date2026/01/30MethodEmail

Comment

Thank you for the feedback. I understand the issue of libraries but even at Virginia township, Welkom, Thabong Library and Thinessun community library our members could not find the physical report and these town's are closest to the proposed project area. Kind regards,

Response

Good day Taole, Thank you for the recommendations, they will be taken under advisement in future. With regard to the physical copy you requested, we are still waiting on a response from the project manager.

Date2026/02/13MethodEmail

Comment

We accepted the invitation. But our concerns are the logistics of why your consultations are not coming to the affected community, i.e Community hall OR Community Church. It raises serious concerns because we use transport and our people can not afford transport. Is there any way to arrange the transport to Harmony Primary School for community members? We support the project as it will develop our community and employ our people as Goldfields Community Forum. As community activists we will ensure that the company comply with the regulations as per MPRDA and PASA. We hope to hear from you, Kind regards,

Response

Good Day ***, Thank you for your continued interest in the project. We acknowledge your concerns regarding the choice of venue for the public meeting and the potential transport constraints that might prevent some community members from attending. In selecting venues, we aim to prioritize locations closest to communities or stakeholders likely to be affected by the project. For this particular project, the zone of influence (or area to be affected) is primarily localized around the application area, and no formal towns or settlements are within this zone. The closest main town is Virginia (where the meeting currently scheduled to be held). According to the Scoping Report, it is unlikely that communities beyond the application area will be significantly affected. Based on this evaluation, we determined that Virginia would be the most reasonable and practical location for a broader meeting venue. However, we understand the importance of a reasonable and inclusive public participation process, especially for communities disadvantaged by distance and cost. We are keen to receive input from all interested parties and to facilitate meaningful participation through reasonable and practical alternatives. In this regard, we would like to direct you and other community members to the venues and platforms available for reviewing the report (attached is the Executive Summary) and other communication channels you can utilize to ask questions and receive responses (emails, telephone calls, etc.). Additionally, there is a data-free site available for communities to access the reports without incurring data costs (<https://www.eims.co.za/2025/11/06/1709-motuoane-production-right-eia/>). Unfortunately, we are not in a position to arrange transport for attendees. Providing transport could create liability and safety responsibilities that the Applicant and EAP cannot manage fairly or consistently for all stakeholders. However, we can offer to provide an MS Teams link for community members to join and participate virtually in the meeting tomorrow. Please let me know by 9am tomorrow if this would be useful to you. Just a reminder that this is currently the Scoping Phase of the project and there are still future opportunities for engagements (i.e. the EIA

Comments and Responses 1709 Motuoane Production Right EIA

Mr Taole Mavious Mokhele

Phase). We are open to improving accessibility for the future EIA phase. If you can propose a suitable community hall or church venue, we will assess whether this can be accommodated in the EIA Phase. We would like to remind you that if you have any comments on the Scoping Report that you want us to include in the final submission, please submit them by the deadline of 23 February 2026, as indicated in the notification of the Scoping Report availability.

Date 2026/02/18 Method Email

Comment

Thank you for the information. Can you share the link for those who will attend virtually please. We appreciate your willingness to improve accessibility for future EIA phase,in the meantime we will arrange a community hall or church. Some will be attending online via MS Teams. But our chairman will be in attendance and some few comrades from Goldfields Community Forum. Thank you very much,

Response

Good day Taole, Apologies for only getting back to you now. As mentioned in the email sent to you, we needed confirmation regarding the MS Teams link before 9am. This was due to the fact that after 9am we were on the road travelling to the meeting venue, and we did not have access to this mailbox anymore. Please find attached the meeting presentation, and do not hesitate to send us any comment and or queries in this regard or anything further.

Date 2026/02/18 Method Email

Comment

Thank you for the information. Can you share the link for those who will attend virtually please. We appreciate your willingness to improve accessibility for future EIA phase,in the meantime we will arrange a community hall or church. Some will be attending online via MS Teams. But our chairman will be in attendance and some few comrades from Goldfields Community Forum. Thank you very much,

Response

Good afternoon Please note that we are still waiting for the MS Teams link. Regards,

Date 2026/02/23 Method Email

Comment

Thank you for the feedback. As Goldfields Community Forum, we would like to pledge our support for the project by Motuoane Production Right EIA.We would like to indicate that our goal is to see people getting jobs and skills development . Our people are not Employed, not in Education and not in training. Therefore this project will bring changes and development to our people and the community as a whole.We are also content with Motuoane Energy as it is consulting with the community and seemingly is complying with regulations set out by PASA. We are therefore looking forward to Social Labour Plan consultations. We hope you find the above in order, With warm regards,

Response

Good day Taole Thank you for your comments. They will be recorded in our reports and submitted to the Competent Authority for consideration. For anything further, please do not hesitate to contact us.

Ms Mnyaka

Comments and Responses 1709 Motuoane Production Right EIA

Ms Mnyaka

Date 2026/02/18 Method Email

Comment

Dear Ms *** The Petroleum Agency SA's comments on the draft scoping report are herewith attached for your consideration.

Response

Good day Sinazo, Thank you for the comments, they are noted with thanks. Please note that a formal response to the comments will be forwarded to you as soon as they have been compiled.

Ms Phumla Ngesi

Date 2026/02/18 Method Email

Comment

1. The statement on page 1, last paragraph of the DSR which refers to the submission of the WUL and AEL applications where relevant. The statement, as currently phrased, suggests that the EAP has not yet determined whether the WUL and AEL applications will be required for the proposed production activities. In our view, the requirements and the applicability of the NWA and NEMAQA should have been assessed at this stage of the process. Providing clarification now would provide certainty regarding additional applications and regulatory processes that may be necessary, not only to the competent authorities but also for the interested and affected parties. This comment is also raised in the spirit of the "One Environmental System" which is intended to streamline the environmental regulation of upstream petroleum activities.

2. The statement indicates the following: "In addition, ongoing exploration activities will include drilling of exploration wells, seismic and/or audio magnetotelluric surveys". The total number of the proposed exploration wells and the distance (in line km) to be covered by the surveys are not indicated.

3. The statement indicates the following: "Consideration will also be given to having the wellsite facilities located below ground level in closed chambers to further reduce the visual and environmental impact". It is premature to indicate that the visual and environmental impact will be reduced if this option is implemented without a thorough impact assessment.

4. The components of the helium recovery facility and gas processing plant are not clearly described in the DSR.

5. The statement indicates the following: "The condensate water will go into an HDPE lined evaporation pond". It is not indicated how the dissolved and suspended substances will be managed.

6. It is noted that the notifications, publications and posters are in three languages (i.e., English, Afrikaans and Sotho). According to Statistics South Africa (2011), IsiXhosa is the second most widely spoken language in the Lejweleputswa District Municipality, accounting for 12.2% of speakers, followed by Afrikaans at 11.3%. It is therefore unclear why IsiXhosa is excluded from the public participation process.

Recommendation 1. It is recommended that the EAP assess the applicability of the NWA and NEMAQA and provide certainty whether the WUL and AEL are triggered.

2. It is recommended that the number of the proposed exploration wells and the distance (in line km) and/or area to

Response

1. It has been determined that an AEL will not be triggered for the proposed development. The relevant Water use licence application will be submitted for the triggers (Section 21 c & i water uses) under the National Water Act. The final Scoping Report has been updated to indicate the above.

2. Up to 48 exploration wells are proposed during the development. A total of 8 seismic transects and 7 telluric lines with a combined length of ~66.74 km are proposed. The final Scoping Report has been updated to indicate the above.

3. The alternative of placing the wellsite facilities below ground has been included in the Final Scoping Report and will be assessed further in the EIA phase.

4. A block diagram to illustrate the components of the helium recovery facility and gas processing plant has been included in the final scoping report (see Figure 10) and a refined process flow diagram will be prepared for inclusion in the EIA report.

5. The condensate water containing dissolved and suspended substances will be stored in a HDPE lined evaporation pond for the evaporation of the liquid content, prior to disposal of the solids. No discharge of polluted water will take place and all leftover solid waste products from the pretreatment module will be collected by a registered waste contractor for offsite disposal at a suitably licenced facility.

6. As stated in the Scoping Report, the proposed project is located in Wards 1, 3, and 4 of the Matjhabeng Local Municipality and Ward 6 of the Masilonyana Local Municipality that both forms part of the Lejweleputswa District Municipality in the Free State Province (2016 municipal boundaries). The majority of people in the area under investigation have Sesotho as home language. Although IsiXhosa is widely spoken in the Lejweleputswa District Municipality, Sesotho remains the mostly commonly spoken language in the study area. Refer to section 9.4.2.3 of the Scoping Report and Section 5.2.4 of the associated Social Impact Specialist Report.

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Ms Phumla Ngesi

be covered by the proposed surveys be specified. 3. It is recommended that the impact of this consideration be assessed as an alternative to placing the wellsite facilities above ground level. 4. It is recommended that a process flow diagram indicating all the inputs, outputs, waste streams and their fate, electricity generator and its capacity, sewage and flare systems and storage tanks for the helium recovery facility and gas processing plant be included in the final scoping report. 5. It is recommended that the management including, treatment and transportation of the dissolved and suspended substances from the lined evaporation pond be indicated in the final scoping report. 6. It is recommended that isiXhosa is included in the public participation process.

Joshua Chambers

Date 2025/11/19 Method Email

Comment

Hi ***, I just received a notification regarding the EIA process being undertaken for the Mutuoane Production Right in the Lejweleputswa District. I believe that I should be registered as an I&AP already, but am guessing this may signal a transition from an exploration right to a production right? In any case, please ensure that I am on the I&AP register throughout the process. Much appreciated,

Response

Good day ***, You are correct, this is now an application for production rights. Furthermore, your request has been noted, you are on our database, and you will be receiving all further communication regarding this proposed project. Additionally, I see that *** has been CCd in this correspondence, should they wish to be added to our database as well, could I please get confirmation. Also please add their contact information and reason for the interest in being added to the database. For any further queries and/or concerns, please do not hesitate to contact us.

Date 2025/11/26 Method Email

Comment

Good afternoon, The below is noted and appreciated. Please do add *** to the database as well, she is a Senior Project Developer at Seriti Green which is also developing a project in the area. Email: *** Kind regards,

Response

Good day ***, Thank you for your email, please note that *** has been added onto our database and will be receiving all further communication regarding the proposed project from this point going forward.

Mr Aluta Ntsuku

Date 2025/11/19 Method Email

Comment

Greetings MEJCON-SA (mining and Enviromental justice community Nertwork of South Africa) wish to be part of the programme. Yours,

Response

Good day ***, Your request has been noted, and you have been added to database, you will receive all further communication regarding this proposed project. For any future concerns and/or queries please do not hesitate to contact us.

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Dr Jack Armour

Date 2025/12/08 Method Email

Comment

Dear EIMS team responsible for the Motuoane application We note the laps in the application process. May we please get the .KMZ of the application area / a list of farms affected as I cant fund such (besides the outline map) on your website. Regards,

Response

Good day ***, Please note that this proposed project (1709 - Motuoane Production Right) has not lapsed and is still in the process of finalising the Scoping Report for public review. I believe you are referring to the proposed project (1681 – Motuoane Exploration Right 386) which lapsed on the 1st of December 2025. Please find attached the requested documents for the latter, please direct all other related mail to this email address: motuoane386@eims.co.za. Should you require further assistance please do not hesitate to contact us.

Ms BODEUX

Date 2026/02/17 Method Telephone

Comment

Ms Bodeux called on behalf of her client Mr Oosthuizen who is a landowner in the Virginia area. She requested that we provide her with a list of properties affected by the application. Mr Whitlow advised that he would get the EAP to provide. Ms Bodeux provided her email address.

Response

Dear *** Following your earlier phone call please see attached and below the list of properties and email response sent to Mr *** in November 2025. Please feel free to contact us if you have any further enquiries.

Date 2026/02/17 Method Email

Comment

Dear *** Please advise as to whether you are able to provide the actual names of the Farms and Farm Portions that stand to be affected. Kind regards,

Response

Good day Mikaella, Thank you for your email, your request is being processed and we will respond accordingly in due course.

Date 2026/02/20 Method Email

Comment

Dear Mbali Thank you for your email. I note that the names of the affected properties have been included at pages 7 and 8 of Scoping Report. As such, we will not require you to resend the list of property names. Apologies for any inconvenience caused.

Response

Hi Mikaella, Thank you for letting us know. For anything further, please do not hesitate to contact us.

Mr Luka Van Der Merwe

Date 2026/01/23 Method Email

Comment

Response

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Mr Luka Van Der Merwe

Good day, Appendix F is not available online, it gives me a Error 404 when I click on it. Please share appendix F? Thank you.

Good day ***, Our sincerest apologies for the delay in response and the inconvenience this may have caused. The issue has been resolved on the website, and all I&APs should be able to access the folder now. Please find attached the working folder for your convenience 1709 Motuoane Production Right EIA – EIMS. Please do not hesitate to contact us should there be any further comments and/or queries.

Date 2026/02/02 Method Email

Comment

Good day, Thank you for an update. I just want to confirm that the comment period will also be extended by a week since all of the information was not available when it began? Kind Regards,

Response

Good day ***, The issue was detected and resolved on Monday the 26th of January 2026. Your email went to the junk mail folder, and the team only noticed it did not belong there on Friday the 30th of January 2026. We will however consult with the Project Manager about this possibility; we will get back to you on the outcome.

Date 2026/02/02 Method Email

Comment

Good day, Thank you for an update. I just want to confirm that the comment period will also be extended by a week since all of the information was not available when it began? Kind Regards,

Response

Good day ***, Please see below the response from the Project Manager: Dear ***, We apologize for the inconvenience caused by the website issue. The link with the error, which was appendix f (Baseline Specialist Reports) was brought to our attention and resolved by Tuesday 27 January 2026. All other links were fully functional from the start of the comment period. Please note that, due to the NEMA deadline for the submission of the final Scoping Report to the authorities, we are unable to extend the comment period beyond 23 February 2026. If you have any comments on the scoping report that you want us to include in the final submission, we respectfully request that you submit them by the deadline of 23 February 2026 and indicated in the notification of the Scoping Report availability. However, if this will not work for you, you are welcome to submit comments a week later, these will be considered and reflected in the subsequent EIA Phase but cannot be included in the final Scoping Report submitted to the authorities.

Lungile Sibanyoni

Date 2026/03/02 Method Email

Comment

Good day Please note that SANRAL is not directly affected by the proposed development. The applicant is however requested to inform SANRAL of any abnormal loads movements. Please confirm receipt of my email.

Response

Good day Lungile, Thank you for your email. It has been received and noted. The applicant will be made aware of your request. For anything further, please do not hesitate to contact us.

Comments and Responses 1709 Motuoane Production Right EIA

Mr Gert Oosthuizen

Date 2025/11/19 Method Email

Comment

Good morning. May I please get more information regarding the Motuoane production right application with reference number 1709? I would like a list of properties affected and any relevant information. Thank you in advance.

Response

Good day ***, Apologies for the delay in response. Please find attached to this email the requested documents. The locality maps can be found in the Background Information Document attached. We have also attached an excel file with the LPI codes for all the identified affected properties. Please let us know if there are any further queries.

Date 2026/02/23 Method Email

Comment

Dear *** Attached please find the comments on the environmental scoping report for the Motuoane production right application (PASA Ref PR12/4/16 on behalf of Optavit Boerdery. Please acknowledge receipt of this email. Kind regards,

Response

Good day Gert, Thank you for the email, your comments have been received and noted. The response will be forwarded to you once it is ready.

Date 2026/02/23 Method Email

Comment

Dear *** Attached please find the comments on the environmental scoping report for the Motuoane production right application (PASA Ref PR12/4/16 on behalf of Optavit Boerdery. Please acknowledge receipt of this email. Kind regards,

Response

Good day **, Please find attached a response to your comments. Thank you for your continuous interest in the proposed project.

Date 2026/02/23 Method Email

Comment

1. RE: COMMENTS ON THE ENVIRONMENTAL SCOPING REPORT FOR THE MOTUOANE PRODUCTION RIGHT APPLICATION (PASA REF.: PR12/4/016) 1.1. I submit these comments in my capacity as a Trustee of the Optavit Trust (Optavit). 1.2. Optavit is the lawful owner of the following properties, which are located near Virginia, Free State: 1.2.1. Hazor no 381 and Azeka no 1019 (the Properties). 1.3. Optavit currently utilizes the Properties for purposes of rearing and grazing cattle. 1.4. Motuoane (Pty) Ltd (Motuoane or the Applicant) holds an Exploration Right (ER315) for hydrocarbons. Motuoane proposes to convert a part of the Exploration Right area, which includes land forming part of the Properties, to a Production Right. The proposed production activities will consist of up to 43 production wells, gas gathering pipelines, a helium recovery and gas processing plant as well as associated infrastructure. In addition, ongoing exploration activities will be conducted which will include drilling of exploration wells, and seismic and/or audio magnetotelluric surveys (the proposed

Response

1. Thank you for your comments and continued involvement on the proposed project. Optavit Trust and Mr Oosthuizen’s legal representatives (Warburtons Attorneys) were pre-identified as I&APs, invited to comment on the application and invited to the Public Meeting held during the public review of the Scoping Report. It must be noted that for the purposes of this application no physical infrastructure and/or seismic transects are proposed Hazor no 381 and Azeka no 1019. It is noted that certain concerns are raised herewith which are addressed in detail in the specific comments and responses provided below. We trust you find this in order. 2.1. Statement is noted. Introductory statement, no response required from the EAP. Please refer to Section 6 of the Scoping Report for a detailed needs and desirability assessment. 2.2. The intention of the Scoping & EIA assessments is not to present only the benefits of the proposed project but also to assess the potential negative impacts, to avoid them where possible and/or mitigate against unavoidable impacts. It is our view that the Scoping Report does not present a one-sided

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activities). 1.5. On 23 January 2026, the Scoping Report was published for comment by Environmental Impact Management Services (EIMS or the EAP) as part of a public participation process and application for environmental authorization for the proposed activities. 1.6. I confirm that comments on the Scoping Report were due by no later than 23 February 2026 and that these comments are accordingly submitted within stipulated timeframes. 1.7. Although our concerns are not limited to these issues, these particular comments are focused on the following key initial issues: 1.7.1. The need and desirability of the proposed activities, particularly in respect of the climate change impact of the proposed activities; 1.7.2. Land use conflicts and the impact that the proposed activities will have on existing agricultural activities in the area; 1.7.3. Management of risks relating to access, safety and security of landowners and their properties; 1.7.4. Potential impacts on water resources; and 1.7.5. The compilation of the emergency response plan. 2. 1. The Environmental Impact Assessment Regulations, 2014, (EIA Regulations) promulgated under the National Environmental Management Act (107 of 1998) (NEMA) require that an environmental impact assessment (EIA) includes a motivation for the need and desirability of the proposed activities. 2.2. The need and desirability of the proposed activities is discussed at sections 1.3 and 6 of the Scoping Report. It is noted, however, that these sections present a very one-sided assessment of only the benefits that the proposed activities may have. The assessment of need and desirability conveniently fails to mention that the burning of natural gas will ultimately result in significant carbon emissions and that the energy source, like coal, is a fossil fuel. Moreover, no references are cited either at section 1.3 or at section 6 of the Report in support of the claims by the EAP that natural gas will act as a bridging fuel as part of the transition from coal power to renewable alternatives. 2.3. Additionally, the summary at section 1.3 focuses primarily on helium, although it does acknowledge that methane will be extracted as a secondary by-product of the proposed activities, save for the fact that it inexplicably concludes by stating that “production success would result in long-term benefits for South Africa consisting of access to new energy sources, improved security of supply, in-country investments in a development project and reduced dependence on the importation of hydrocarbons. It should be noted that SA is pursuing a diverse energy mix which include significant renewable power generation”. No direct link is made in context between this statement and (presumably) to the production of methane as part of the proposed activities, this is only done later in section 6 of the Report. The EAP’s election to exclude much of the information pertaining to natural gas in the Executive Summary and focus instead on helium only is questionable. 2.4. At page 63 of the Scoping Report, the EAP specifically cites the “Guideline on need and desirability in terms of the EIA Regulations (Notice 819 of 2014)” (the Guideline). As its name suggests, there are several requirements for the assessment of need and desirability set out under the Guideline. Under section 2 of the Guideline, which considers the strategic context of assessing need and desirability, it is specifically stated that “it is essential that the implementation of social and economic policies takes cognizance of strategic concerns such as climate change”. However,

assessment, however, we will refine the need and desirability section to include the fact that the project is for fossil fuel and that such does release GHG which will be assessed in detail in the EIA Report. Furthermore, management measures to minimise potential negative impacts and/or enhance potential benefits are put forward in this Scoping Report. These measures will be adjusted where relevant during the EIA phase once detailed assessments are concluded and input from the public has been considered. As such we do not agree with the statement that the needs and desirability presented in the Scoping Report is a one-sided assessment of only the benefits that the proposed activities may have. The Department of Energy’s Integrated Resource Plan (2025) is cited as in Section 6 stating that “the requirement for gas combine cycle gas turbines in the South African power system by 2030 is critical in lieu of the impending decommissioning of 8 GW of baseload coal-fired plants.” Other citations such as the National Development Plan and Integrated Energy Plan are also made in this section identifying the need to diversify the current energy mix and to reduce carbon emissions. 2.3. Thank you for the comment. The Executive Summary (incl. Section 1.3) intentionally emphasises helium because the Motuoane resource is described in the Report as geologically distinctive in that helium occurs at unusually high concentrations and is expected to be the primary product, with methane recovered as a secondary by-product. Further clarity in this regard has been added to the executive summary. As stated in Section 1.3 and 6 of the Scoping Report, the proposed Motuoane development aims to prioritise helium as the primary product, with methane recovered as a secondary by-product. Section 1.3 is a non-technical executive summary that aims to condense a large volume of technical information and present it in a manner that allows a laymen’s understanding of the project. It is therefore not the EAP’s intention to exclude information pertaining to natural gas anywhere in the assessments and/or reporting. This is supported by the extensive and detailed specialist studies proposed to inform the EIA Report. 2.4. - 2.10. You comment about the need to assess the climate change impacts of the proposed activity is valued. Kindly refer to response to comment 2.2 above. Furthermore, the proposed climate change impact assessment to be undertaken by a specialist during the EIA phase aims to assess the potential negative impacts, including the downstream climate change impacts which the use of the natural gas produced by the proposed activities will have. An assessment of the downstream climate change impacts of the proposed activities will be undertaken and presented in the subsequent EIA Report. It is the EAP’s opinion that the requirements of the Needs and Desirability Guideline have been comprehensively addressed in Section 6 of the Scoping Report. 3.1. - 3.3. We acknowledge the potential impacts of the proposed development on agricultural activities, particularly livestock. It must be noted however, that these will be for a limited time during the construction phase and measures to mitigate these have been proposed and will be refined during the EIA Phase. A detailed noise impact assessment will be undertaken to further assess the potential impacts and advise on suitable mitigation measures. Negotiations with directly affected landowners are currently ongoing and will be undertaken in detail before activities are undertaken. Measures will be in place to prevent displacement of landowners and livestock. 3.4. The report also states that

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the assessment of need and desirability in the Scoping Report has not been adequately juxtaposed against the potential negative impacts which these activities may have, particularly the downstream climate change impact which the use of the natural gas produced by the proposed activities will have. 2.5. I am advised that a similar issue was raised in the recent matter of Green Connection NPC and Another v Minister of Forestry, Fisheries and Environment and Other (Total Energies). This matter was concerned with the decision to grant an environmental authorisation to conduct exploration activities for hydrocarbons off the West Coast of South Africa. One of the grounds of review raised in this matter was that the assessment of need and desirability failed to take into account the climate change impacts which will be caused by burning fossil fuels discovered by the proposed project, notably greenhouse gas emissions and fugitive emissions. 2.6. In respect of production, the Applicant in this matter specifically argued that “once produced, the gas would inevitably be consumed in South Africa, and generate greenhouse gases, which would have significant implications for compliance with the country’s emissions reduction targets and worsen the global climate crisis with ramifications for environmental conditions in South Africa”. 2.7. To this end, the Court noted that “it is incongruous to rely on the long-term benefits of generating electricity and gas – which is a result of production, whilst not considering the climate change effects of production”. 2.8. This judgment sets a precedent that the EAP’s assessment of need and desirability, specifically for production activities involving hydrocarbons, must go beyond simply the benefits of natural gas more generally and deal with the negative impacts which the burning of those fossil fuels will have on the climate as well as the ramifications of the use of natural gas in respect of South Africa’s international obligations to reduce its carbon emissions. 2.9. At present, the EAPs analysis of need and desirability of the proposed activities is entirely asymmetric and is not sufficiently weighed against the negative climate change impacts that the proposed activities will have. This does not meet the requirements of the EIA Regulations. 2.10. In light of the above, it is requested that the EAP conduct a full and balanced assessment of the downstream climate change impacts of the proposed activities, and that these impacts are included in the assessment of the need and desirability of the project. 3.1. The assessment of need and desirability, as well as the broader Scoping Report itself, also takes an overly simplified approach to the potential negative impacts on agricultural activities in the area as well as the impact which the proposed activities may have on food security. 3.2. The DFFE Screening Tool specifically identifies the Agricultural Theme as having a very high sensitivity and it is acknowledged in that Scoping Report that “the proposed project activities may be undertaken may result in agricultural land lost and/or reduced livestock production [sic]”. 3.3. It is specifically noted on pages 83 to 85 of the Report that drilling, regardless of the specific drilling method, causes noise pollution. It is also confirmed on page 180 of the Report that drilling, as well as the use of the Vibroseis truck for exploration activities, will result in high noise levels. This can, in turn, impact local ecosystems and disrupt plants and animals. 3.4. The Report goes on to state that “if the crop fields found within the study area are active, the

if the crop fields within the study area are inactive, the production activities will have an overall low to medium residual impact on the agricultural production ability of the land. The preliminary assessment of the directly affected land (infrastructure placement) shows limited crop field disturbance. An Agricultural Impact Assessment will be undertaken in the EIA Phase. 3.5. The proposed continuation of the exploration activities will be limited to the identified corridors. Furthermore, negotiations with directly affected landowners will be undertaken and measures to avoid and/or mitigate potential negative impacts on land parcels where agricultural activities are currently being conducted will be put forward. It must also be noted that this is an application for production and impacts associated with such production must be identified and assessed, which in our has been done. Kindly clarify if you have any concerns on the nature or significance of the impact as is currently described in the report. 3.6. As is noted above, your properties (Hazor no 381 and Azeka no 1019) do fall within the Production Right Application area. However, for the purposes of this application no physical infrastructure and/or seismic transects are proposed on these portions. Your concerns relating to the impact of the activities on cattle grazing are however valuable. We have expanded the description of this impact on the Scoping Report. The impact will be further assessed, together with the specialist team, during the EIA phase. The anticipated number of vehicles and approximate traffic trips during the construction and operational phases are indicated in Table 7 of the Scoping Report. It can be seen from this that the increases in traffic will be limited and for a short duration during construction. The same can be said for flaring which will only be undertaken when absolutely necessary during emergency situations. However, a detailed noise impact assessment will be undertaken in the EIA Phase to further assess the potential impacts on nearby receptors (livestock included) and advise on suitable mitigation measures. Strict access protocols agreed to by landowners will be followed during development and operational phases of the project. The fencing surrounding the drill sites will be able to be modified easily to maximize the land use available for the landowner as well as maintain separation of cattle from the drill sites. 3.7. As mentioned above, potential impacts on livestock will be for a limited time during the construction phase and measures to mitigate these have been proposed and will be refined during the EIA Phase. The recent foot and mouth disease (FMD) outbreak in South Africa has introduced a significant risk to the cattle farming industry and will be assessed in detail in the EIA Phase and presented in the relevant reports and management plans. 3.8. All baseline specialist studies undertaken during the Scoping Phase were done at a desktop level with the intention of detailed site-specific studies being conducted during the EIA Phase. The nature and scale of the proposed project is not expected to have a significant impact on the broader socioeconomic environment or the agricultural sector in the Free State. As such it is the EAP’s view that an agricultural economist study is not warranted. A detailed Agricultural Impact Assessment will be undertaken during the EIA Phase. 3.9. Impact Assessment Matrix including the nature, significance, consequence, extent, duration and probability of identified impacts. The proposed activities are localised, cover a small footprint in relation to the PR application area, and in many cases have a short term direct impact. It is expected that if

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production activities will have an overall high residual impact on the agricultural production ability of the land". Overall, it is clear that both livestock and crops will suffer a high negative impact as a result of the proposed activities. 3.5. The Report, however, attempts to minimize the issue by stating that the bulk of the proposed activities will not be conducted in areas where agricultural activities are currently being undertaken. These deductions are arguably misleading in that it is proposed that exploration activities are conducted under the Production Right, which activities may well impact parcels of land on which agricultural activities are currently being conducted. 3.6. As a cattle farmer, it is a particular concern that the proposed activities will have a high negative impact on my farming operation. This impact is three-fold: 3.6.1. Firstly, as mentioned above, cattle production may be impacted by the proposed activities. Increases in traffic and noise disturbances in the area will likely impact on cattle behavior which will, in turn, impact breeding and production. 3.6.2. Secondly, without stringent access protocols, including fencing drill sites, the proposed activities may lead to increased losses of cattle due to cattle escaping and being injured or killed. 3.6.3. Lastly, where an incident such as a well blowout or fire resulting from flaring activities occurs, this may result in more widespread fatalities to cattle herds and/or will likely impact production. 3.7. A decrease in production and any loss of cattle due to fatalities will have a direct economic impact on my farming operation. The cumulative impact of production activities in the Virginia / Winburg area on cattle farming outputs may also lead to a notable decline in supply which may, in turn, impact food security. The recent foot and mouth disease (FMD) outbreak in South Africa has exposed the vulnerabilities in the cattle industry specifically and how pricing and access to beef products can quickly become volatile when supply is restricted in any way. These impacts have not been adequately considered in the Scoping Report. 3.8. While it is acknowledged that a Soils, Agriculture, Freshwater and Terrestrial Biodiversity Screening Report has been commissioned, no mention is made of a specific Agricultural Economist Report. The baseline Soils, Agriculture, Freshwater and Terrestrial Biodiversity Screening Report contains only a very superficial assessment of the impact that the proposed activities will have on land capability and not the specific impacts on affected farming operations. 3.9. The EIA Regulations require that an environmental impact assessment include a full description of the impacts of the proposed activities, including the nature, significance, consequence, extent, duration and probability of such impacts. In the absence of a full Agricultural Economist Report, the EAP's current assessment of the impact that the proposed activities will have on agriculture falls short of this requirement. 3.10. I respectfully submit that an assessment of Soils and Agriculture alone is insufficient and a full Agricultural Economist Report which examines the impact that the proposed activities will have on agricultural activities in the area must be commissioned. 4.1. The potential negative impact which the proposed activities may have relating to access and the safety and security of landowners, livestock and their properties is noted at page 179 of the Report. The significance of the impact on safety and security is, however, only noted as being medium to high during construction, but otherwise

management and mitigation is correctly implemented that there will not be a significant impact. 3.10. We acknowledge your concerns of impacts on Agricultural activities within the proposed study area; however, we firmly believe that the proposed Soils and Agricultural Specialist Assessments will be sufficient in identifying, assessing and mitigating against potential impact on current Agricultural activities in and around the proposed study area. 4.1. - 4.3. Impacts on safety and security have been identified and assessed in the Scoping Report as highlighted by the I&APs comment. Mitigation has also been proposed to combat the likely increased security risk during the Motuoane's presence on the properties. Motuoane is also committed to working closely with landowners and local security teams to ensure they uphold the safety of the communities and that of its own workers. As such, should there be additional and reasonable safety measures proposed by the affected landowners, Motuoane will consider including these to their protocols. 4.4. Kindly refer to response to comment 3.7 above. Where necessary Motuoane will adapt its access protocols to adhere to the required biosecurity measures in place at the time. 4.5. Kindly refer to response to comment 3.7 above. Where necessary Motuoane will adapt its access protocols to adhere to the required biosecurity measures in place at the time. 4.6. As stated above, strict access protocols agreed to by landowners will form part of the Environmental Management Programme (EMPr) and will be followed during development and operational phases of the project. A draft Access Protocol will be made available for comment during the EIA Phase review period. These will include adherence to biosecurity measures and providing notice to landowner when Motuoane employees access the land and providing employee identification/verification. 4.7. - 4.8. An EMPr (including a draft access protocol) will be drafted and submitted together with the EIA Report for public review and an access protocol will form part of this EMPr. 5.1. - 5.3. Statements are noted. These are introductory statements and do not require a response from the EAP. 5.4. - 5.6. The impacts on Surface and Groundwater Quality and Quantity have been identified and assessed in Section 10.3 of the Scoping Report. Furthermore, detailed Aquatic Biodiversity and Wetland Impact Assessment as well as Geohydrological Assessments will be undertaken in the EIA Phase. These studies will also be complimented by a detailed Social Impact Assessment. 6.1. Statement is noted. Introductory statement, no response required from the EAP. 6.2. - 6.4. The risk of fire (including from flaring and/or onsite workers) has been identified and assessed in the Scoping Report. An emergency preparedness / response plan will be drafted as part of the EMPr which will include fire prevention / management protocols. 7.1. Your request for information has been noted. As stated previously stated, baseline specialist studies were undertaken for the Scoping Phase Assessment and detailed specialists' studies will be undertaken in the EIA Phase of the project. These will include but not limited to Climate Change Impact Assessment, Agricultural Impact Assessment, Social Impact Assessment and Groundwater Impact Assessment including aquifer characterisation. Access protocols and emergency response plan will be drafted as part of the EMPr that will be submitted together with the EIA Report. 7.2. We hereby confirm receipt of your comments. Please be advised that a verbatim copy of your comments, as received, and our

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low. This is, with respect, completely understated. 4.2. Certain mitigation measures are proposed in the Scoping Report to limit this impact, including that: 4.2.1. Farm gates must be closed immediately upon entry/exit; 4.2.2. Drill sites must be fenced and have security access control and warning signs; 4.2.3. There must be access control to the entry / exit points of the project sites; and 4.2.4. Vehicles should be clearly marked as construction vehicles. 4.3. Farms are inherently sparsely populated and relatively isolated. In a country such as South Africa, which suffers from a particularly high crime rate, farms are particularly vulnerable to acts of crime due to their remoteness from neighbors and emergency services. The result is that farmers are particularly sensitive to any activities which may contribute to any further risks to their safety and security. 4.4. Additionally, the potential for diseases to spread increases exponentially when there is unrestrained movement of persons and vehicles between different farms. At present, the National Disaster Management Centre has classified the ongoing FMD outbreak, affecting multiple provinces including the Free State, as a national disaster. The FMD outbreak has raised serious concerns as to the ongoing viability of the cattle industry in South Africa. As such, strict biosecurity and access protocols have been put in place in several agricultural areas around the country to assist in preventing the spread of the disease. This includes measures restricting access to farms, and thoroughly disinfecting vehicles, people and equipment when entering/exiting farms. This has not been taken into account at all in the Scoping Report and must be included in the EIA. 4.5. Unfortunately, the proposed activities will accordingly create a significant risk to farmers as well as their properties and livestock, including exposure to disease. During the construction phase in particular, the proposed activities will require unfamiliar vehicles and persons to enter and exit farmland. This makes surveillance for crime prevention particularly difficult and may lead to an increased exposure to disease, especially since many workers will be moving between various livestock farms. 4.6. In light of the above, the proposed mitigation measures listed at 4.2 above are not sufficient. In addition to these measures, I respectfully submit that an extensive Access Protocol should be compiled and adhered to by Motuoane. This would include requirements such as providing notice to landowner when Motuoane employees access the land and providing landowners with employee identification/verification. This document should also include biosecurity measures that are to be implemented to prevent the spread of any diseases which will impact on agricultural activities, such as FMD. Such a document would be key to Motuoane's proposed impact management actions in order to mitigate the impact on safety and security. 4.7. It is noted that Item 1(1)(f) of Appendix 4 to the EIA Regulations requires that an Environmental Management Programme (EMPr) include a description of proposed impact management actions. This would accordingly include the Access Protocol. In terms of section 23(1)(a) of the EIA Regulations, the EMPr must then be subjected to a 30-day public participation process along with the EIA. 4.8. In light of the above, I request that Motuoane compile an Access Protocol and that same is made available for public comment in due course. 5.1. The Scoping Report identifies a potential negative impact on groundwater quality during operation and

corresponding responses will be integrated into the Public Participation Report and subsequently presented to the Competent Authority for their consideration. 7.3. The responsible person at the Competent Authority is Ms ***. The relevant contact details are: *** *** (Ref: 12/4/016). 7.4. Please note that the formal designated public comment period on the Scoping Report has ended. The Scoping Report together with the comments received will be submitted to the CA for consideration and decision making. A copy of the Scoping Report submitted will be made available on the EIMS website shortly thereafter.

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closure phases. Several potential sources of water contamination are noted in respect of the proposed activities, including: 5.1.1. Seepage of poor-quality water and leachate of waste products. 5.1.2. Seepage of poor-quality water and leachate of waste products including drilling mud sump(s). 5.1.3. Migration of saline groundwater from the deep, fractured aquifer to the overlying, potable aquifer(s) during the gas production phase. 5.1.4. Migration of stray gas from the deep, fractured aquifer to the overlying, potable aquifer(s) during the gas production phase. 5.1.5. Migration of contaminants from the plant footprint as well as associated waste facilities and infrastructure into local water resources and host aquifers. 5.1.6. Mobilisation and maintenance of heavy vehicles and machinery on-site may cause hydrocarbon contamination of groundwater resources. 5.2. Where there is contamination, this would impact the following receptors: 5.2.1. Down-gradient drainages and streams including associated riparian zone aquifer system(s) and baseflow contribution. 5.2.2. Private or neighbouring boreholes associated with relevant fracture zones and/or structures(s) if intercepted by the pollution plume migration footprint. 5.3. The Virginia/Winburg area is highly vulnerable to water scarcity. Any additional pressure on water resources in the area can have widespread detrimental impacts on farming activities and the livelihoods of the community in the area. 5.4. It is therefore a particular concern that there is no assessment of the impact that contamination will have on farming activities and local communities nor is there any indication that the emergency response plan will address contamination incidents. 5.5. At the very least, in line with Item 3(1)(v) of Appendix 3 to the EIA Regulations, an assessment of the socio-economic impact that a contamination event may have on local communities must be undertaken including an assessment of the nature, significance, consequence, extent, duration and probability of that impact. 5.6. I accordingly request that a social-economic impact assessment is commissioned which deals with all of the impacts of the proposed activities and more specifically with impacts resulting from incidents resulting from the proposed activities which cause water contamination. 6.1. At page 18, the EAP proposes that an emergency response plan is developed which must include a spill response, fire prevention protocols and a blowout response. 6.2. Fire is a particular concern for farmers as it can have devastating impacts on farming operations. In the Virginia/Winburg area specifically, fires are known to spread quickly during the dry season and on days with strong winds. Given that Motuoane proposes to conduct flaring activities, the risk of uncontrolled fires occurring will be high. It is also a concern that Motuoane's employees may start fires on site either purposefully for heat or cooking, which may become uncontrolled, or cause uncontrolled fires negligently, e.g., by discarding lit cigarettes. 6.3. As with the Access Protocol proposed above, the emergency response plan is fundamentally a key impact management action. As such, this document must be included in the EMP and subjected to public participation along with the EIA for the proposed activities. To hold otherwise would fall short of what is required in terms of Item 1(1)(f) of Appendix 4 to the EIA Regulations and section 23(1)(a) of the EIA Regulations. 6.4. I accordingly request that the emergency response plan is compiled and made available for

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public comment in due course. 7.1. In conclusion, I request the following: 7.1.1. That a full assessment of the downstream climate change impacts of the proposed activities is commissioned, and that these impacts are included in the assessment of the need and desirability of the project; 7.1.2. That an Agricultural Economist Report is commissioned to consider the full suite of impacts on agricultural activities that the proposed activities will have; 7.1.3. That an Access Protocol is compiled and made available for public comment; 7.1.4. That the nature, significance, consequence, extent, duration and probability of the socio-economic impact that contamination of groundwater resulting from the proposed activities may have on local communities is assessed; and 7.1.5. That the full emergency response plan is made available for public comment. 7.2. Please confirm receipt of these comments, and that same have been provided to the Competent Authority in this form. 7.3. Please provide information on the relevant contact/responsible person at the Competent Authority. 7.4. I reserve my right to submit further comments in respect of the current Scoping Report, especially after further information is provided.

Kahmani Gounden

Date 2025/11/17 **Method** Email

Comment

Good day I trust you are well. I came across your notification in the Government Gazette, We, Sibanye Gold has mining rights in that area. Can you please send me the KMZ of the application area to see if the Motuoane Energy application falls over the Sibanye mining rights or Sibanye owned property. Can you also register myself and Stephan as I&APs. Regards,

Response

Good day ***, Apologies for the delay in response. Please find attached the requested KMZ file. Additionally, you have both been added to our database as I&APs, you will receive all further correspondence regarding this proposed project.

Date 2025/11/26 **Method** Email

Comment

Good day Please add the people cc'd into your database, as they deal with the environmental authorisations over our mining rights and this are falls into our SOFs mining right FS 10005 MR. Can you please advise what sort of exploration activities will be carried out? Regards,

Response

Good day ***, Thank you for your email, the I&APs listed have been added onto our database and will be receiving all further communication regarding this proposed project going forward. Please find attached the BID for further information on the project. Should you wish to gain further information beyond this point please do not hesitate to contact us.

Date 2025/12/02 **Method** Email

Comment

Good day Can you please send me an image and the KMZs for the proposed wells, pipelines and plant? Regards,

Response

Good day ***, Please find attached the locality map and kmz as requested. Please note that this is a preliminary layout and may change based on the outcomes of the EIA study. Additionally,

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Kahmani Gounden

could you please share a kmz of your mining right FS 10005 MR indicating the boundary as well as current and future infrastructure.

Date 2025/12/15 **Method** Email

Comment

Good day Please see attached the KMZ of the mining right. Please advise when the draft scoping report will be available for comments. Regards,

Response

Good day Please advise when the draft reports will be available for comment. Regards,

Date 2025/12/15 **Method** Email

Comment

Good day Please see attached the KMZ of the mining right. Please advise when the draft scoping report will be available for comments. Regards,

Response

Good day ***, Thank you for your email. Our sincerest apologies for the delay in response, the team was out for the festive break. Please note that we cannot give you a concrete answer about when the draft Scoping Report for the proposed project will be published for public review at the moment, this is because the Project Manager/EAP on this proposed project is still on leave. We will get back to you with the correct information as soon as we have it available to us. If there are any further concerns or queries, please do not hesitate to contact us.

Date 2026/09/07 **Method** Email

Comment

Good day This is one mining right that has been granted and executed. Please advise on the status of the EIA mentioned below. Regards,

Response

Good Day Kahmani, Thank you for the email and the kml. Please advise if this provided kml (attached to this email) is a single MR (FS 10005 MR) or these are several MRs. Please also indicate if the MR is an existing approved MR or currently in application phase. We would appreciate any information you can share with us at this stage such as the type of mining (above ground / underground), general depth of underground infrastructure (if any within the Proposed D3 Energy Production Right), any activities / agreements which restrict the proposed D3 Energy Production Activities. We would appreciate your swift response as we are finalizing the Draft EIAR for public review later this month and we would like to have adequately assessed / considered the MR in the EIAR.

Sipho Richard Mtembu

Date 2026/07/01 **Method** Email

Comment

Dear EIMS Team, I trust you are well. On behalf of the Free State Goldfields Mining Indaba, I

Response

Good day, Many thanks for your submission. Please note that we have included your

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Sipho Richard Mtembu

am writing to invite Motuoane Pty Ltd t/a EIMS to come on board as a Key Technical Partner for the Indaba taking place on 23 & 24 October 2025, Goldfields Casino, Welkom. Why EIMS + Why Now The Goldfields is moving from gold extraction to closure, rehabilitation, and energy transition. With Exploration Right ER386 covering 58,000 hectares for gas, plus active mine closure plans, DMPR and the mines have a compliance and delivery problem to solve in the next 24 months. The Indaba is the only platform bringing DMPR, the Premier’s Office, Matjhabeng LM, Mine CEOs, and SMMEs into one room to sign POs and MOUs. The Mandate: Unlock R87.25M in ring-fenced mine procurement with a dedicated Rehabilitation & Energy Track and 299 youth jobs. Key Technical Partner Proposal – What EIMS Gets 1. Key Technical Partner Status – Branded as “Official Environmental & Rehabilitation Partner” on stage backdrop, programme, website, and sponsor deck. 2. DMPR + Mine Access – Closed technical session with DMPR, mine Environmental Managers, and Closure Specialists to align on ER386, EMPr, water, and tailings scope. 3. Rehab Pipeline Briefing – First access to the consolidated “Goldfields Rehab & Closure Buyer’s List” from 3+ mines. This is the R87.25M pipeline. 4. Thought Leadership Slot – 15-min keynote on “Bankable Rehabilitation: From Liability to Energy Asset” on Day 2. Position EIMS as the technical lead. 5. Welkom Declaration Technical Signatory – EIMS named as a technical delivery partner in the Declaration signed by the Premier on 24 Oct. Partner Contribution "Key Technical Partner" investment: R35,000 adjust to your rate. This includes your technical session, keynote, branding, and 2x VIP passes. We are only appointing 1x Key Technical Partner in the Environmental space. Early-bird deadline: 19 July 2026. Next Step Can we schedule a 30-minute technical briefing this week? We need EIMS at the table to shape the Rehab + ER386 agenda before we finalise the mine Buyer’s List. I will will send you the 1-Page Concept Note and Draft Welkom Declaration attached, once we receive your feedback. EIMS has the credibility to lead this transition. Let’s make Welkom the case study for it. Ke a leboha for your consideration. Kind regards,

correspondence in the EIA Public Participation Report, which will be submitted with the final report to the competent authority for consideration in its decision-making. We have also forwarded your submission to the applicant for consideration. Please advise if you have any further comments related to the environmental impacts associated with the project.

Date 2026/07/03 Method Email

Comment

Good day, and thank you for the update and for including our correspondence in the EIA Public Participation Report. Mantshiyane Legacy Trading Pty Ltd notes the inclusion. We have no objections to the project proceeding, subject to the following socio-economic and environmental management comments being considered by the applicant and competent authority. 1. Local Economic Development & SMME Participation We request that the EMPr and Final EIA Report include a binding commitment for minimum 30% local procurement from Lejweleputswa SMMEs during construction and operations. We offer to assist via the Free State Goldfields Mining Indaba SMME Database to ensure transparent, bankable supplier linkage. 2. Job Creation & Skills Transfer We request a clause for priority employment of local labour from

Response

The comments are acknowledged and appreciated. 1. The EAP acknowledges and appreciates the comment and support for local economic development initiatives. The EIA process recognises the importance of maximising positive socio-economic benefits associated with the proposed project, including opportunities for local procurement and participation by local businesses where feasible. The Social Impact Assessment considered potential local economic benefits, including opportunities for local suppliers, service providers and SMMEs. Refer to the Social Impact Assessment and Section 7.3.17 (Socio-Economic Impacts) of the EIA Report. While the Applicant is encouraged to provide opportunities for local procurement and supplier development where practicable, the establishment of specific procurement quotas or percentage-based procurement

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Sipho Richard Mtembu

Matjhabeng LM, with a skills development plan targeting youth and women, aligned to DMPR and DESTEA mandates. 3. Environmental Management - Dust, Water & Rehabilitation We support the proposed mitigation measures. We further request that the Closure and Rehabilitation Plan prioritise the use of local CIDB-rated contractors for rehabilitation works, and that post-closure land use includes opportunities for community projects. 4. Ongoing Engagement We request to remain a Registered I&AP and to receive all future BAR/EIA, EMPr, and decision documents for comment. Please confirm receipt and inclusion of these comments in the final submission to DMPR.

targets falls within the Applicant's operational and commercial decision-making processes and cannot be imposed through the EIA process unless required by applicable legislation. The offer to assist through the Free State Goldfields Mining Indaba SMME Database is noted and will be brought to the Applicant's attention for consideration. 2. The EAP acknowledges the comment and supports the principle of promoting local employment and skills development opportunities. The Social Impact Assessment undertaken as part of the EIA process identified local employment, skills transfer and economic participation as potential positive socio-economic impacts associated with the project. The EIA Report recommends, where reasonably practicable, that employment opportunities associated with the project give preference to suitably qualified local residents and that opportunities for skills development be communicated to local communities. However, the EIA process is not the appropriate mechanism through which specific employment quotas, recruitment commitments or labour targets can be legally enforced. Such matters are generally addressed through the Applicant's operational management, employment policies and any applicable regulatory requirements administered by the relevant authorities. Refer to Section 7.3.17 (Socio-Economic Impacts) and Appendix F9 (Social Impact Assessment). 3. The EAP acknowledges the support for the proposed environmental mitigation measures. The EMPr includes management measures relating to dust suppression, water resource protection, rehabilitation and site closure to minimise potential environmental impacts associated with the proposed exploration activities. Rehabilitation commitments and closure objectives are included within the EMPr and will be implemented in accordance with applicable regulatory requirements. The recommendation regarding the utilisation of local CIDB-registered contractors for rehabilitation activities is noted and will be communicated to the Applicant for consideration during future planning and implementation phases. The comment regarding post-closure land use opportunities for community-based projects is also noted. The EIA process recognises the importance of sustainable land use following rehabilitation and recommends that future land-use considerations take account of stakeholder interests, environmental suitability and applicable land-use planning requirements. Refer to the EMPr, Rehabilitation Measures and relevant specialist assessments included in the EIA Report. 4. The EAP confirms receipt of the comments and thanks Mantshiyane Legacy Trading (Pty) Ltd for participating in the Public Participation Process. The organisation remains registered as an Interested and Affected Party (I&AP) on the project stakeholder database and will continue to receive project-related notifications in accordance with the requirements of the National Environmental Management Act (NEMA) and the Environmental Impact Assessment Regulations, 2014 (as amended). These comments and the corresponding responses will be included in the Final Comments and Responses Report accompanying the Final EIA Report and EMPr submitted to the competent authority for consideration. The EAP appreciates the stakeholder's ongoing interest and participation in the environmental assessment process. The EAP acknowledges and appreciates the constructive comments submitted by Mantshiyane Legacy Trading (Pty) Ltd. The issues raised regarding local economic development, employment opportunities, skills development, environmental

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Sipho Richard Mtembu

management, rehabilitation and ongoing stakeholder engagement have been considered and, where relevant to the EIA process, have been addressed within the EIA Report, specialist studies and EMPr. These comments and responses will be included in the Final Issues and Responses Report forming part of the Final EIA submission to the Competent Authority. We thank the stakeholder for its participation and continued engagement in the environmental assessment process Kind Regards

Ms Samkelisiwe Lamula

Date 2026/02/16 Method Email

Comment

Good Morning Kindly request a KMZ file of the proposed site, and a copy of the scoping report. Kindly please know that we normally do not attend public meetings, but t we can give comments if we are impacted.

Response

Goo day Samkelisiwe, Apologies for the delay in response. Please find attached the kmz as requested.

Ms Celine Oates

Date 2026/02/23 Method Email

Comment

1. We represent Red Rocket South Africa (Pty) Ltd (“Red Rocket”), and the individual renewable solar photovoltaic facilities in the impact area of the proposed activities. 2. Motuoane Energy (Pty) Ltd (“Motuoane”) holds an Exploration Right (“ER315”) for hydrocarbons, granted in terms of section 80 of the Mineral and Petroleum Resources Development Act 28 of 2002 (“MPRDA”) on the 19 October 2018. The Department of Mineral and Petroleum Resources (“DMPR”), the erstwhile Department of Mineral Resources and Energy (“DMRE”), issued an Environmental Authorisation (“EA”) under reference number: 12/3/315 to Motuoane in terms of the National Environmental Management Act 107 of 1998 (“NEMA”). 3. We note that the EA is currently under appeal and therefore suspended in accordance with the prescripts of section 43 of NEMA. The net effect of the suspension of the EA is that the Applicant has not completed its exploration activities within the study area. In the circumstances, it would be premature to authorise production activities within the study area as the effect of authorising the production wells in the same and/or in close proximity to the exploration wells that are currently suspended is to bypass the current suspension of the EA thereby rendering the EA appeal moot. 4. Motuoane wishes to convert a portion of ER315 into a production right for the proposed extraction and production of helium and methane gas which will consist of up to 43 production wells, 4 gas gathering pipelines constructed from high-density polyethylene pipe with varying

Response

1 Thank you for your comment and the clarification provided in terms of the individual renewable solar photovoltaic facilities represented. Red Rocket and its legal representatives (Richard Summers Inc.) were preidentified as I&APs, invited to comment on the application and invited to the Public Meeting held during the public review of the Scoping Report. 2 Introductory statement noted. 3 A decision on the appeal lodged against the ER315 Part 2 amendment of the Environmental Authorisation (EA) was issued by the Mister of the Department of Forestry, Fisheries and the Environment (DFFE) in December 2025. Of the two Appeals received on the project, one was dismissed in totality while the other was not considered. Kindly see attached a copy of the Appeal Decision. 4 Statement noted. 7 It is noted that certain concerns are raised herewith which are addressed in detail in the specific comments and responses provided below. We trust you find this in order. 7.1. Baseline air quality assessment was undertaken by Airshed Planning Professionals in November 2025 (Appendix F2 of the Scoping Report). Available data for the Welkom South African Weather Service Station was used to establish baseline meteorological conditions for the proposed project site. Baseline findings are indicated in Section 9.11 of the Scoping Report. Section 10.3 of the Scoping Report and Appendix G presents the preliminary air quality impact assessment and mitigation measures. Row 2 of Table 39 of the Scoping Report indicates that detailed air quality impact assessments will be undertaken in the EIA Phase. 7.2.

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lengths, a helium recovery and gas processing plant and associated infrastructure. The associated infrastructure includes an office and maintenance workshop beside the helium and gas processing facilities and access tracks for vehicles. 5 The Virginia 1-4 solar PV facilities fall directly within the proposed production area as depicted in the Scoping Report: Motuoane Production Right Application prepared by Environmental Impact Management Services (Pty) Ltd dated 19 December 2025 (the “Scoping Report”): 6 The proposed activities envisaged in the Scoping Report “will focus on the wells located on the Virginia fault where there are 13 new well locations and 3 existing wells that will be utilised”. 2 As seen in Figure 1 above, the Virginia faultline pointed out by the blue arrow dissects the Virginia 1-4 solar PV facilities. 7 The assumptions and limitations disclosed in the Scoping Report identify significant gaps on which the decision-maker cannot render a rational nor reasonable decision. These gaps include: 7.1. Air quality: “No site inspections were conducted for the Air Quality Scoping Phase Assessment”, and “No publicly available ambient data was available for inclusion into the scoping report”. 7.2. Biodiversity: “The assessment area was based on the area provided by the client and any alterations to the footprint and/or missing GIS information pertaining to the assessment area would have affected the area surveyed”. 7.3. Geohydrology: “The concept of representative elementary volumes (REV) has been applied i.e. a scale has been assumed so that heterogeneity within a system becomes negligible and thus can be treated as a homogenous system. The accuracy and scale of the assessment will result in deviations at point e.g. individual boreholes” (emphasis supplied). 7.4. No go alternative: “although the no go alternative is not considered reasonable for this application, it will be assessed in the EIA phase”. 8 In light of the gaps in information alluded to in the Scoping Report, the decisionmaker lacks the necessary informational basis on which to render a rational, balanced and informed decision. These gaps in information bring into question the assessment of cumulative impacts of the proposed development, and have the effect of inflating the perceived benefits of the proposed development without adequately catering for the negative impacts thereof. This approach to impact assessment is misleading and cannot serve to inform rational and reasonable decision making. Despite the omission of material information, the Environmental Assessment Practitioner (“EAP”) concludes that “the level of risk associated with the limits of current knowledge is considered low at this stage”. 9 When gas exploration and production activities risk undermining other sustainable land uses (such as our clients renewable energy developments), the minimum requirement for demonstrating need and desirability is much higher than for ordinary development applications. 10 The Applicant must show that the proposed gas activity serves a compelling public interest, not merely private commercial benefit. The Scoping Report demonstrates a bias in favour of gas production to the exclusion of other land uses on the basis of a comparative analysis with other extractive industries such as coal which is not a valid or appropriate benchmark to satisfy the threshold of need and desirability in terms of NEMA and the Environmental Impact Assessment Regulations. 11 The minimum evidence that should be included in the Scoping Report, but which the EAP has failed

There have been no alterations to the boundaries of the proposed Production Right Area. 7.3. This statement describes a common modelling assumption used in geology, hydrogeology, and reservoir studies. Its aim is to explain how complex natural systems are simplified when doing regional hydrogeological assessments. However, the investigation will include a site characterisation phase as well where site specific data were also gathered to support desktop level information available. 7.4. Assessment of the no-go alternative is a requirement under the NEMA EIA Regulations. It is the baseline against which all other alternatives and the project proposal are assessed. 8 The NEMA EIA regulations clearly state that an environmental impact assessment report must contain the information that is necessary for the competent authority to consider and come to a decision on the application, and must include a description of any assumptions, uncertainties and gaps in knowledge which relate to the assessment and mitigation measures proposed. As such, the assumptions and limitation alluded to in the Scoping Report are critical in guiding the proposed studies in the direction of finding the relevant answers as well as identifying and assessing impacts in hopes of developing the appropriate mitigation measures. Furthermore, it is not the intention of the EAP to inflate the perceived benefits or present a misleading impact assessment. 9 We acknowledge your concerns of the perceived risk of undermining your clients land use. Motuoane is mindful of the overlapping right holders and approved renewable energy developments within the proposed Production Right application area. As stated in the Scoping Report, the Applicant respects the interests of all surrounding stakeholders and seeks to find a coexistence arrangement that would be beneficial to all parties involved. In compliance with the requirements of Appendix 2 of the EIA Regulations 2014 as amended, alternative assessment was undertaken and represented in Section 7 of the Scoping Report while the need and desirability is presented in Section 6 of the Scoping Report. 10 Your assertion that the Scoping Report demonstrates a bias in favour of gas production to the exclusion of other land uses is noted, however not agreed with. The Scoping Report clearly advocates for coexistence of multiple land uses such as renewables, current agricultural and mining land uses. 11 Although wind and solar PV resources have become the default options in the replacement of existing generation with cleaner technologies, these are still supported by battery storage and flexible generation such as natural gas. One of the 2025 IRP’s policy statements indicated that the 6 GW of gas CCGT by 2030 is crucial in ensuring and maintaining security of supply when the 8 GW of baseload operation of coal-fired stations is shutdown. As such, albeit small in comparison, gas still plays a vital role in South Africa’s energy mix and transition. The Scoping and Specialist Reports clearly states that the mining sector (which is the dominant sector in the Matjhabeng and Masilonyana municipalities) is on a downward trend and many businesses that have traditionally depended on the mining sector have either closed down or are in the process of closing down. Manufacturing aimed at the mining sector also exists in these municipalities. As such, and although limited, the proposed project has the potential to contribute to the local economy. Kindly refer to Row 19 of Table 37 of the Scoping Report where the upliftment of communities and employment is discussed. If the project is done correctly and

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to address, includes: 11.1 Alignment with national or regional energy policy; 11.2 Demonstrating consistency with current energy transition frameworks; 11.3 Showing why gas is still required within the energy mix (e.g., transitional fuel, grid stability); 11.4 Supply security justification; 11.5 Evidence of projected gas shortages or infrastructure gaps; 11.6 Demonstration that imports or alternative sources cannot reasonably meet demand; 11.7 Economic necessity; 11.8 Quantified economic contribution (jobs, taxes, regional development); 11.9 Demonstrate that benefits outweigh environmental and social costs; 11.10 The proposed gas activities supports energy transition (e.g., backup for renewables) and 11.11 The proposed activities do not crowd out grid capacity for renewable energy facilities. 12 Without a clear, evidence-based need tied to official policy, the application should fail at the need and desirability stage. 13 This is critical where the proposed gas activities conflict with renewable energy or other sustainable land uses. The Scoping Report fails to demonstrate adherence to the following minimum requirements: 13.1 Alternatives assessment; 13.2 Other geographic locations with lower conflict; 13.3 Existing brownfield or already-disturbed land; 13.4 Non-fossil alternatives (renewables, storage, demand management); 13.5 Technology alternatives; 13.6 Less invasive extraction methods; and 13.7 Reduced surface footprint options. 14 If a renewable energy development could reasonably use the same land more sustainably, the Applicant must provide strong justification for preferring gas. 15 The Applicant must demonstrate minimal interference with: 15.1 Solar / wind farm potential; 16.2 Agricultural productivity; 15.3 Biodiversity corridors; 15.4 Water resources; 15.5 Spatial planning integration; 15.6 Compliance with zoning and land-use frameworks; and 15.7 Avoidance of protected or high-value renewable zones. 16 If the proposed gas activities sterilise land for renewable use (e.g., drilling pads across a solar-designated corridor), this is a major negative factor as the proposed gas production activities have serious risk of undermining sustainability goals. 17 The Applicant must demonstrate that the proposed activities do not undermine renewable energy development. In the case of this proposed development, the proposed gas activities conflict directly with several approved renewable energy projects as the Virginia faultline dissects the Virginia 1-4 solar PV facilities. See Figure 1 above. 18 As a direct conflict exists, the Applicant must demonstrate that there will be no displacement of viable renewable projects, or that renewable projects cannot be reasonably implemented in the area, or that the proposed gas infrastructure will be temporary and the land will be rehabilitated. 19 The regulatory framework comprising NEMA and the EIA Regulations applies a balancing approach towards achieving sustainable development as required in terms of section 2 of NEMA. 20 As the area has strong renewable capacity and gas production is not critical to supply security, demonstrating need becomes significantly more difficult for the Applicant. This is even more so when climate commitments are legally binding. In this regard, the EIA must be able to demonstrate that the environmental and sustainability harm is proportionate to the public benefit. If the proposed gas activities contradict adopted renewable energy or climate policy, it will likely fail the desirability test unless exceptional circumstances are shown. 21 The

in line with the mitigations and management measures proposed by the EAP/Specialist, then there are opportunities for positive local benefits. 11 Although wind and solar PV resources have become the default options in the replacement of existing generation with cleaner technologies, these are still supported by battery storage and flexible generation such as natural gas. One of the 2025 IRP's policy statements indicated that the 6 GW of gas CCGT by 2030 is crucial in ensuring and maintaining security of supply when the 8 GW of baseload operation of coal-fired stations is shutdown. As such, albeit small in comparison, gas still plays a vital role in South Africa's energy mix and transition. The Scoping and Specialist Reports clearly states that the mining sector (which is the dominant sector in the Matjhabeng and Masilonyana municipalities) is on a downward trend and many businesses that have traditionally depended on the mining sector have either closed down or are in the process of closing down. Manufacturing aimed at the mining sector also exists in these municipalities. As such, and although limited, the proposed project has the potential to contribute to the local economy. Kindly refer to Row 19 of Table 37 of the Scoping Report where the upliftment of communities and employment is discussed. If the project is done correctly and in line with the mitigations and management measures proposed by the EAP/Specialist, then there are opportunities for positive local benefits. 12 As stated above, one of the 2025 IRP's policy statements indicated that the 6 GW of gas CCGT by 2030 is crucial in ensuring and maintaining security of supply when the 8 GW of baseload operation of coal-fired stations is shutdown. 13 It is the view of the EAP that the proposed gas production activities do not conflict with renewable energy or other land uses in the area. In fact, coexistence of these land uses is being advocated for instead of choosing one over the other. Motuoane is a natural gas and helium company and doesn't engage in other project activities. However, the Applicant does not prefer gas over renewable energy development as you state. 13.6 The Scoping Report was compiled in according with the NEMA EIA Regulations. In compliance with the requirements of Appendix 2 of the EIA Regulations 2014 as amended, alternative assessment was undertaken and represented in Section 7 of the Scoping Report. This section addresses all minimum requirements as listed herein. 15 In demonstrating compatibility with surrounding land uses, it can be stated that there are numerous mining right holders in the area. Furthermore, the Applicant holds an exploration right on the area covered by this application. The Tetra4 production development is also located adjacent to the proposed Motuoane production right study area. The Scoping Report also states that neighbouring land-use in the surrounding of the proposed project comprises predominantly of agriculture activities with mining activities to the southwest and more recently renewable development. Although the application area for the Production Right is approximately 14 440 hectares, this must not be confused with the development footprint which will be significantly less in extent (i.e. less than 50 ha). A significant portion of the proposed infrastructure will be below ground thus allowing other surface land uses to continue with minimal disturbance. Also of importance is that a sensitivity approach will be followed which will be used to guide infrastructure placement. Where impacts are avoidable this will be considered as a primary option. 16 As stated above, the Applicant respects the interests of

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Applicant must show consistency with: 21.1 National climate legislation; 21.2 Integrated resource plans; 21.3 Sustainable development frameworks; 21.4 Just energy transition policies and strategies; and 21.5 Regional spatial development frameworks. 22 The minimum threshold includes: 22.1 Climate impact analysis; 22.2 Cumulative impact assessment; 22.3 Water contamination risk assessment; 22.4 Biodiversity impact assessment and offset plan; 22.5 Social impact assessment; and 22.6 If the proposed gas activity conflicts with climate commitments, proof that the proposed development does not undermine national decarbonisation targets. 23 The EAP has adopted an Applicant-favoured approach in which every opportunity is used to promote the extractive gas operations by drawing an invalid distinction between the production operations and other extractive methods and means of resource extraction. For example, the EAP promotes a significant distinction between gas extraction and alternative resource extraction such as coal, indicating that it is part of South Africa's need to diversify the current energy mix and reduce carbon emissions. Gas production projects results in significant air quality, water, and other environmental impacts, and in the present context places our clients' renewable energy projects (which are alternative sources of energy aimed specifically at reducing carbon emissions) at significant risk. 24 In these circumstances, the EAP has failed to acknowledge, identify, investigate and assess the impacts of the proposed development on our clients' renewable energy projects, which impacts: 24.1 Threatens the security of energy supply; 24.2 Threatens an increased access to energy; and 24.3 Promotes the negative environmental impacts inherent in the energy section. 25 Instead, the EAP relies on grossly superficial and populist understanding of the production activities, one which affirms the proposed development as some kind of bridge between a coal-intensive energy industry to renewable energy developments as being the main contributor to energy production in South Africa. 26 Gas extraction that threatens the overall feasibility and very existence of renewable energy developments is not an improvement on the coal-intensive energy industry, but rather continues invasive resource extraction at the expense of South Africa's obligations in the context of the Just Energy Transition. Put differently, the exploration and development of gas fields should not be encouraged where exploration and development directly threaten existing renewable energy facilities. The failure by the EAP to acknowledge the impacts of the proposed development on renewable energy facilities is done at the expense of the environment, the local affected community and specifically, our clients' renewable energy developments. This has rendered the scoping phase of the proposed development to be ill-informed, irrational and unreasonable. 27 Appendix 2 of the EIA Regulations requires scoping to identify impacts (including significance, probability and duration) and potential mitigation / residual risk, and to set the plan of study (including specialist topics) for the EIA phase. In order to be defensible, the Scoping Report must as a bare minimum identify potential impacts and potential mitigation and/or residual risks on: 27.1 Land-take, servitudes, and micro-siting constraints in relation to approved and/or constructed renewable energy facilities. These include but are not limited to: 27.1.1 Direct footprint loss from well pads, laydown areas,

all surrounding stakeholders and seeks to find a coexistence arrangement that would be beneficial to all parties involved. It is therefore not the intention of the project to sterilise land for any other developments. 17 Kindly refer to responses to items 15 and 16 above. 19 Statement noted. 20 Kindly refer to response to item 12. 21 According to the Integrated Resource Plan (IRP) published in October 2025, South Africa will need to significantly expand locally sourced natural gas to meet future energy demands, especially as coal is phased down and renewable integration accelerates. Natural gas is positioned as a transition fuel to complement renewables. Current imports from Mozambique's Pande-Temane fields will be depleted by 2028, increasing the demand for locally sourced gas to reduce reliance on imports and ensure energy security. Furthermore, the proposed application is within an approved exploration right which aligns with the Free State Provincial Spatial Development Framework. 22 22.1 Kindly refer to section 9 and 10 of the Scoping Report. Additionally, cumulative impacts are assessed in section 10 of the Scoping Report and where necessary will be updated in the EIA Phase. 22.6 The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications and will identify the largest emitting sources through thorough assessments. Downstream GHG emissions will also be assessed. 23 The intention of the Scoping & EIA assessments is not to present an Applicant-favoured approach as stated but also to assess the potential negative impacts, to avoid them where possible and/or mitigate against nonavoidable impacts. Furthermore, management measures to minimise potential negative impacts and/or enhance potential benefits are put forward in this Scoping Report. These measures will be adjusted where relevant during the EIA phase once detailed assessments are concluded and input from the public has been considered. The Department of Energy's Integrated Resource Plan (2025) is cited as in Section 6 stating that "the requirement for gas combine cycle gas turbines in the South African power system by 2030 is critical in lieu of the impending decommissioning of 8 GW of baseload coal-fired plants." Other citations such as the National Development Plan and Integrated Energy Plan are also made in this section identifying the need to diversify the current energy mix and to reduce carbon emissions. The proposed project is for gas production and associated activities and not any other land use. It is noted in the Scoping Report that there are renewable energy developments proposed within the Production Right area. The Applicant is in the process of negotiating a coexistence with these developments. Both the renewable energy and the gas sectors contribute to the economy in different ways, and a balanced approach is needed to ensure sustainable growth. South Africa is navigating a path where renewable energy is becoming more prominent while also recognizing the continued importance of mining. The scoping phase outcomes show that there will be limited impact on current land use as the nature and spatial extent of this development is such that it is possible to allow for multiple land uses to co-exist. 24 It is noted in the Scoping Report that there are renewable energy developments proposed within the Production Right area. The Applicant is in the process of negotiating a coexistence with these developments. The Scoping Report has identified, investigated and assessed the impacts of the proposed development on renewable

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camps, roads, pipelines in relation to reduced developable land inside renewable footprints. 27.1.2 Potential sterilisation and/or setbacks (safety buffer zones around gas infrastructure) in relation to approved layouts of solar arrays, crane paths, or substation placement. 27.1.3 Access restrictions (gates, heavy-vehicle routes) affecting O&M access to PV blocks / substations. 27.2 Ground instability and foundation risk. In this regard, the following key impacts requires detailed investigation and assessment: 27.2.1 Vibration from drilling, heavy trucking, and (where used) fracturing operations can affect sensitive components and solar panel foundations. 27.2.2 Subsidence and/or ground movement (from extraction/void changes) and induced seismicity (risk screening) could damage foundations, panel bases, buried cables, and substations. 27.3 Air quality impacts reduce renewable performance, including: 27.3.1 Dust generation (road building, vehicle movements, earthworks) causes soiling losses on PV panels / mirrors and higher cleaning water demand. 27.3.2 Combustion emissions (diesel engines, generators, flaring where applicable) creates local haze/particulates that reduces solar irradiance and accelerates corrosion on exposed electrical equipment. 27.4 Noise and nuisance impacts (from drilling) and continuous industrial sound may: 27.4.1 Create worker health and safety issues at nearby renewable O&M facilities. 27.4.2 Trigger community complaints which cumulatively impacts nearby renewable energy projects, 27.4.3 Require coordination of noise limits / monitoring (especially if renewable energy facilities in close proximity are clustered). 27.5 Traffic, logistics, and road safety impacts associated with Abnormal loads and heavy trucking (i.e. rig moves) may: 27.5.1 Damage roads used by renewable energy facility construction / O&M. 27.5.2 Raise accident risk near shared access points. 27.6 Water resource competition and contamination pathways, including: 27.6.1 Water abstraction demands may compete with PV washing / local water availability that renewable energy facilities rely on for construction and O&M. 27.6.2 Pollution risks (spills, drilling muds, wastewater) man impact aquatic ecology; wetlands / groundwater that underpin environmental authorisations for renewable energy facilities. 27.7 Soil, erosion, and stormwater impacts on shared catchments such as: 27.7.1 Clearing and road cuts can increase erosion / sediment loads which may affect drainage around substations, and cable routes; alter runoff patterns which may cause flooding / scour around renewable foundations and access roads. 27.8 Biodiversity and ecosystem-services constraints, namely: 27.8.1. Gas-field fragmentation alters habitat which may affect biodiversity no-go areas placing further constraints on renewable energy facilities. 27.8.2 Cumulative impacts on birds / bats / ecosystems may be significantly increased when gas and renewable energy facilities are co-located thus requiring additional specialist assessments. 27.9 Fire and/or explosion risk and emergency planning interfaces. In this regard, pipeline and/or compressor hazards may require emergency response integration with nearby renewable energy facilities, restrictions on ignition sources and maintenance activities, and potential revised design for battery storage, substations, and transformers near gas infrastructure. 27.10 Visual, lighting, and land-use compatibility impacts, including: 27.10.1 Industrial visual intrusion (well pads, flares, stacks, night lighting) may affect landscape character and tourism /

energy projects in the area. To this effect alternatives specific to the renewable developments within the proposed production right are being investigated with the intention of ensuring possible impacts are effectively avoided and/or managed. 25 The Department of Energy's Integrated Resource Plan (2025) is cited as in Section 6 stating that "the requirement for gas combine cycle gas turbines in the South African power system by 2030 is critical in lieu of the impending decommissioning of 8 GW of baseload coal-fired plants." Other citations such as the National Development Plan and Integrated Energy Plan are also made in this section identifying the need to diversify the current energy mix and to reduce carbon emissions. In light of the statements above, the EAPs understanding is neither superficial nor populist but linked to policy. We do not agree with the statement that the EAP failed to acknowledge the impacts of the proposed development on renewable energy facilities, kindly refer to response to item 24 above. 27 The Scoping Report was compiled in according with the NEMA EIA Regulations. In compliance with the requirements of Appendix 2 of the EIA Regulations 2014 as amended, refer to section 10 of the Scoping Report for impact identification and section 12 for plan of study. 27.1 Alternative assessment was undertaken and represented in Section 7 of the Scoping Report. The potential impacts identified will be assessed further in the EIA Phase with the assistance of full specialist studies as proposed in the Scoping Report. 27.3 Air quality impacts have been identified and assessed in the Scoping Report. Baseline findings are indicated in Section 9.11 of the Scoping Report. Section 10.3 of the Scoping Report and Appendix G presents the preliminary air quality impact assessment and mitigation measures. Row 2 of Table 39 of the Scoping Report indicates that air quality impact assessments will be undertaken in the EIA Phase. 27.4 Noise impacts have been identified and assessed in the Scoping Report. Preliminary findings are indicated in Sections 1.5 and 10 of the Scoping Report. Row 4 of Table 37 of the Scoping Report indicates that air quality impact assessments will be undertaken in the EIA Phase. 27.5 Impacts on Traffic and road infrastructure have been identified and assessed in section 10 of the Scoping Report. 27.6 Impacts on surface and groundwater resources has been identified and assessed in section 10 of the Scoping Report. 27.7 Soil erosion and sedimentation have been identified and assessed in section 10 of the Scoping Report. 27.8 Impacts on biodiversity have been identified and assessed in section 10 of the Scoping Report. 27.9 The risk of fire (including from flaring and/or onsite workers) has been identified an assessed in the Scoping Report. An emergency preparedness / response plan will be drafted as part of the EMPr which will include fire prevention / management protocols. 27.10 Visual, lighting, and land-use compatibility impacts have been identified and assessed in section 10 of the Scoping Report and will be given additional attention during the EIA Phase. 27.11 Interference with Existing Land Uses (Damage / Disruption of activities / services / infrastructure) has been identified and assessed in section 10 of the Scoping Report. 27.12 Kindly refer to section 9 and 10 of the Scoping Report. Additionally, cumulative impacts are assessed in section 10 of the Scoping Report and where necessary will be updated in the EIA Phase. 28 The importance of identifying and assessing biodiversity impacts associated with the proposed development is acknowledged. Section 9.8 and 9.9 together with the proposed

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agricultural land uses. 27.10.2 Cumulative visual impact where renewable energy facilities already change the landscape. 27.11 Interference and compatibility with electrical / grid infrastructure where route conflicts with renewable transmission lines, and substations (physical crossings, protection zones) and/or construction vibration and trenching risks to buried high voltage cables and earthing systems. 27.12 Cumulative and “cluster” effects in relation to noise, traffic, habitat fragmentation, visual effects, shared corridors, shared sensitive receptors. 28 Potential biodiversity impacts for the proposed gas exploration activities are particularly critical, and the Scoping Report must demonstrate that the EIA phase will align with: 28.1 NEMA; 28.2 The National Environmental Management: Biodiversity Act (“NEM:BA”). 28.3 The Department of Forestry, Fisheries and the Environment (“DFFE”) guidelines. 28.4 Provincial conservation frameworks and Critical Biodiversity Area (“CBA”) mapping. 29 The EIA must demonstrate minimal interference with biodiversity and the following specific questions must be evaluated: 29.1 What biomes and vegetation types occur in the affected area? 29.2 Are any vegetation types in the gas exploration area listed as Threatened Ecosystems under NEM:BA? 29.3 Are there CBAs or Ecological Support Areas (“ESAs”) present in the gas exploration area? 29.4 What is the current level of habitat transformation or fragmentation in the gas exploration area? 29.5 Are there any Red List species (flora or fauna) recorded in the gas exploration area? 29.6 Are there endemic or range-restricted species in the gas exploration area? 29.7 Are migratory routes or breeding areas present in the gas exploration area? 29.8 Are any protected tree species present in the gas exploration area (trees protected under the National Forests Act)? 29.9 Will equipment movement introduce invasive alien species in the gas exploration area? 29.10 What biosecurity controls are planned in the gas exploration area? 29.11 Could there be indirect impacts (noise, dust, traffic) on biodiversity in the gas exploration area? 30 With regard to vegetation clearing in connection in the gas exploration area, the following specific questions must be evaluated: 30.1 How much vegetation will be cleared for seismic lines, drilling pads and access roads? 30.2 Is the clearing temporary or permanent? 30.3 What is the likelihood of habitat fragmentation? 31 With regard to seismic surveys, the following specific issues of concern must be evaluated: 31.1 What are the potential impacts of seismic surveys, blasting or vibroseis on burrowing mammals, ground-nesting birds or reptiles? 31.2 Will the noise impacts associated with seismic surveys disrupt breeding cycles of such species? 32 With regard to cumulative impacts, the following specific issues of concern must be evaluated: 32.1 Are there existing mining, fracking, or agricultural activities nearby? 32.2 What is the combined habitat loss across the region? 32.3 What will the impact be of multiple seismic surveys on fauna and avifauna? 32.4 Can infrastructure be relocated to avoid CBAs? 32.5 Can existing roads be used instead of new ones? 33 The Soils, Agriculture, Freshwater And Terrestrial Biodiversity Screening Report prepared by the Biodiversity Company dated September 2025 (“Biodiversity Screening Report”) records the following: 33.1 In terms of ecosystem threat status, the study area overlaps with Endangered and Least Concern ecosystems. Further, the study area overlaps with Not Protected, Moderately Protected and

plan of study in section 12 demonstrates how the Scoping Report and subsequent EIA Report align with these Acts and Guidelines. 29 Kindly refer to section 9.8 of the Scoping Report for the baseline assessment including biomes and vegetation types that occur in the affected area. Impacts on biodiversity will be assessed further in the EIA Phase. Kindly refer to Table 39 of the Scoping report for details of the proposed biodiversity specialist inputs in the EIA phase. 29.10 Strict access protocols agreed to by landowners will form part of the Environmental Management Programme (EMPr) and will be followed during development and operational phases of the project. A draft Access Protocol will be made available for comment during the EIA Phase review period. These will include adherence to biosecurity measures developed in agreement with landowners. 29.11 Indirect impacts on biodiversity have been identified and will be assessed in detail in the EIA Phase. Detailed specialist impact assessments will be undertaken to further assess the potential impacts and advise on suitable mitigation measures. 30 Statement noted. 30.1 Vegetation clearance will be kept to a minimum (i.e 50x50m for drill pads, 10m wide servitude for pipelines, 1.5ha for the processing plant). Existing access roads will be used as far as possible. 30.2 Vegetation clearance will be temporary where there is no permanent infrastructure and all temporary clearance such as for the installation of underground pipelines will be rehabilitated. 30.3 As with any clearance of vegetation, habitat fragmentation is possible. However, this impact has been identified and mitigation measures proposed. 31 Statement noted. 31.1 It must be noted that no blasting is proposed. As mentioned above, impacts on biodiversity have been identified (refer to section 10 of the Scoping Report). A full biodiversity assessment has been commissioned and proposed additional mitigation and management measures where required. 31.2 32 As previously stated, mining and agriculture are prevalent land uses in the area. The EAP has no evident or knowledge of fracking. Cumulative impacts are assessed in section 10 of the Scoping Report and where necessary will be updated in the EIA Phase. 33 Statement noted. 33.1 A sensitivity approach methodology will be followed to guide placement of infrastructure as far as possible, where impacts are avoidable this will be considered as a primary option. Suitable mitigation will be proposed where impacts are not avoidable. 33.2 Kindly refer to response to item 30.1 above. Although the application area for the Production Right is approximately 14 440 hectares, the development footprint (clearance) will be significantly less in extent (i.e. less than 50 ha). Cumulative impacts are assessed in section 10 of the Scoping Report and where necessary will be updated in the EIA Phase. 33.3 A baseline Terrestrial Biodiversity Impact Assessment was undertaken at the Scoping Phase that identified that the study area overlaps with NPAES Priority Focus Areas. Assessment refer to Section 10.3 of the Scoping Report for the description and preliminary assessment of impacts. Local requirements, constraints and opportunities of these biodiversity areas and impacts on ecosystems will also be assessed and reported on in the EIA Report and associated biodiversity specialist’s reports. 33.4 Preliminary impact assessment associated with mining have been identified and assessed in section 9 and 10 of the Scoping Report. Detailed assessments of these impacts will also be undertaken by the EAP and specialists in the EIA Phase. 33.5 Preliminary mitigation measures for

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Poorly Protected ecosystems. A visual representation of the overlap of the study area and the affected ecosystems is presented in Figures 4-1 and 4-2 of the Biodiversity Screening Report. Can infrastructure be relocated to avoid Endangered ecosystems to reduce strain on already poorly protected ecosystems? 33.2 In terms of the Free State Conservation Plan dataset, the study area overlaps with ESAs 1 and 2, CBAs 1 and 2, Degraded Areas and Other Natural Areas. The Scoping Report indicates that habitats may be damaged during the construction phase of the proposed development but anticipates that this will amount to a “low cumulative impact on natural habitats upon implementation of mitigation measures” due to the “small scale of clearing required for the proposed activities, short duration and rehabilitation”. The material omission of the specific scale of clearing required makes it impossible to determine whether or not the conclusion of a “low cumulative impact” is factually sound. Please explain how direct, indirect and cumulative impacts have been investigated and what measures will be put in place to safeguard CBAs and ESAs and to prevent irreversible harm on irreplaceable / important biodiversity in the affected biodiversity areas in Figure 4-3 of the Biodiversity Screening Report. 33.3 In terms of the National Protected Area Expansion Strategy 2010 (“NPAES”), the study area overlaps with NPAES Priority Focus Areas. Please explain what steps have been taken to investigate and assess the local requirements, constraints and opportunities of the study area to ensure that the proposed development does not hamper the ability of the NPAES to meet its protected areas targets which area aimed at strengthening resilience and reducing vulnerability to climate change? A visual representation of the overlap of the study area and the NPAES Priority Focus Areas is presented in Figure 4-5 of the Biodiversity Screening Report. 33.4 In terms of the Mining and Biodiversity Guidelines spatial dataset (2013), the study area “is of ‘moderate’ and ‘highest’ biodiversity importance, correlating to moderate and the highest risk for mining”. How has the scope of indirect impacts been assessed given the high risks associated with mining in the study area? On what basis has no-go zones been excluded in circumstances where a significant portion of the gas exploration area is identified as areas of biodiversity importance? A visual representation of the overlap of the gas exploration area in relation to the Mining and Biodiversity Guidelines spatial dataset is presented in Figure 4-8 of the Biodiversity Screening Report. 33.5 In terms of the Southern African Bird Atlas Project 2 data, it is anticipated that 264 avifauna species may occur in the gas exploration area. Of these 264 avifauna species, 31 are considered species of conservation concern. The Scoping Report indicates that the full list of species expected to occur within the gas exploration area will only be provided in the final EIA report. Of particular concern is the possible presence of *Circus ranivorus* (African Marsh Harrier) which is listed as Endangered in South Africa (ESKOM, 2014). This species is declining due to inter alia the degradation of wetland habitats, loss of habitat through over-grazing and human disturbance. As this species breeds in wetlands, what measures have been put in place to protect the breeding grounds for the African Marsh Harrier, particularly in circumstances where the Biodiversity Screening Report fails to identify no-go areas for the proposed development? 33.6 In terms of the National Web based Environmental

impacts on biodiversity have been proposed in section 10 of the Scoping Report. Detailed measures will be investigated and will form part of the Environmental Management Programme (EMPr) to be drafted during the EIA Phase. 33.6 Statement noted. 33.6.2 Proximity in this regard must not be construed to mean production wells will be placed within watercourses and wetlands. However, wells may be drilled within regulated areas of a wetland (i.e. within 500m of a wetland), and the necessary water use licence applications will be lodged in accordance with the National Water Act in such instances. 33.6.3 Statement noted. 34 Construction impacts of land clearing during construction are identified and assessed in section 10 of the Scoping Report. We acknowledge the potential impacts of the proposed development on agricultural activities, particularly livestock. It must be noted however, that these will be for a limited time during the construction phase and measures to mitigate these have been proposed and will be refined during the EIA Phase. Infrastructure is largely proposed in areas with very little to no active crop production, however, direct loss of grazing and cropping land during site clearance and infrastructure establishment will be assessed in detail during the EIA Phase. 35 Preliminary impact assessment associated with mining have been identified and assessed in section 9 and 10 of the Scoping Report. Detailed assessments (i.e Soil and Agricultural) of these impacts will also be undertaken by the EAP and specialists in the EIA Phase as stated in the plan of study. 36 A detailed Freshwater and Wetlands Impact Assessment has will be undertaken to delineate wetlands within study area. Kindly refer to the plan of study for planned specialist studies. Preliminary impact on surface water resources have been identified and assessed in section 9 and 10 of the Scoping Report.

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Screening Tool, the theme sensitivity for the gas exploration area has been characterised as follows: 33.6.1 The Terrestrial Biodiversity Theme sensitivity is Very High due to the area “overlapping with CBA 1, CBA 2, ESA 1, ESA 2, NPAES, an Endangered Vegetation type, NPAES areas and a FEPA Sub catchment area”. In this regard, See Figure 5-1 of the Biodiversity Screening Report. 33.6.2 The Aquatic Biodiversity Theme sensitivity is Very High “due to numerous wetlands, rivers and a FEPA Sub catchment area”²⁰ occurring within the gas exploration area. Despite the Very High sensitivity attached to the gas exploration area ,the Scoping Report records that “Some production wells and seismic transects are proposed within and/or proximity of watercourses and wetlands”. No justification is tendered for the placement of production wells within watercourses and wetlands. In this regard, see Figure 5-4 of the Biodiversity Screening Report. 33.6.3 The Agriculture Potential Theme sensitivity is Very High. “Crop field boundaries demarcated with a Very High sensitivity were identified ... and categorised as rainfed annual crop cultivation / planted pastures and horticulture”. In this regard, see Figure 5-5 of the Biodiversity Screening Report. 33.6.4 The gas exploration area falls within the Very High sensitive Virginia Protected Agricultural Areas. 34 The Biodiversity Screening Report, on page 43 identifies the gas exploration area as falling within very high agricultural sensitivity land, including crop fields and protected agricultural areas, yet the construction-phase impacts of land clearing on active farming operations and livestock production are not expressly assessed. The Biodiversity Screening Report confirms that the site overlaps cultivated land and areas of high agricultural potential, including rain-fed crop fields and the Virginia Protected Agricultural Areas, but does not analyse the direct loss of grazing and cropping land during site clearance and infrastructure establishment. The failure to identify, investigate and assess impacts associated with land clearance during the construction- creates a gap in the assessment process. 35 The Scoping Report acknowledges a likelihood of significant adverse residual impacts on agricultural production capability, yet it proposes no clear or enforceable mitigation measures to address potential residual impacts. Active agricultural lands contribute directly to food security, local livelihoods and longterm soil productivity. Impacts to agricultural lands may be irreversible. Without verified site data confirming the condition of the fields and soils, and without a defined mitigation or compensation framework, the Scoping Report fails to demonstrate that agricultural resources will be adequately protected. 36 As the Biodiversity Screening Report concludes that, inter alia, water resources will be impacts, the absence of a dedicated freshwater impact assessment to delineate wetlands within the gas exploration area is alarming. What is required is the identification and assessment of all potential impacts at the earliest stage of the proposed development so as to ensure that the public are provided with ample opportunity to interrogate the findings of specialists, and if required, to commission a peer review of the respective assessments. It is not sufficient to defer the freshwater impacts to the EIA phase only. 35 The Scoping Report acknowledges a likelihood of significant adverse residual impacts on agricultural production capability, yet it proposes no clear or enforceable mitigation measures to address potential residual impacts. Active

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agricultural lands contribute directly to food security, local livelihoods and longterm soil productivity. Impacts to agricultural lands may be irreversible. Without verified site data confirming the condition of the fields and soils, and without a defined mitigation or compensation framework, the Scoping Report fails to demonstrate that agricultural resources will be adequately protected. 36 As the Biodiversity Screening Report concludes that, inter alia, water resources will be impacts, the absence of a dedicated freshwater impact assessment to delineate wetlands within the gas exploration area is alarming. What is required is the identification and assessment of all potential impacts at the earliest stage of the proposed development so as to ensure that the public are provided with ample opportunity to interrogate the findings of specialists, and if required, to commission a peer review of the respective assessments. It is not sufficient to defer the freshwater impacts to the EIA phase only. 35 The Scoping Report acknowledges a likelihood of significant adverse residual impacts on agricultural production capability, yet it proposes no clear or enforceable mitigation measures to address potential residual impacts. Active agricultural lands contribute directly to food security, local livelihoods and longterm soil productivity. Impacts to agricultural lands may be irreversible. Without verified site data confirming the condition of the fields and soils, and without a defined mitigation or compensation framework, the Scoping Report fails to demonstrate that agricultural resources will be adequately protected. 36 As the Biodiversity Screening Report concludes that, inter alia, water resources will be impacts, the absence of a dedicated freshwater impact assessment to delineate wetlands within the gas exploration area is alarming. What is required is the identification and assessment of all potential impacts at the earliest stage of the proposed development so as to ensure that the public are provided with ample opportunity to interrogate the findings of specialists, and if required, to commission a peer review of the respective assessments. It is not sufficient to defer the freshwater impacts to the EIA phase only.

Date 2026/02/23 Method Email

Comment

Dear Sir/Madam We refer to the above matter and confirm that we act on behalf of Red Rocket South Africa (Pty) Ltd, and the individual renewable solar photovoltaic facilities in the impact area of the proposed activities. Kindly see attached hereto comments on the Final Scoping Report. Kindly confirm receipt hereof. Kind regards,

Date 2026/02/23 Method Email

Comment

Dear Sir/Madam We refer to the above matter and confirm that we act on behalf of Red

Response

Good day ***, Please find attached responses to your comments. For anything further, please do not hesitate to contact us

Response

Hi Celine, Thank you for your comments, they have been received and noted. Please note that a

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Rocket South Africa (Pty) Ltd, and the individual renewable solar photovoltaic facilities in the impact area of the proposed activities. Kindly see attached hereto comments on the Final Scoping Report. Kindly confirm receipt hereof. Kind regards,

formal response will be drafted and forwarded to you once it is ready.

Date 2026/02/23 Method Email

Comment

37 The Scoping Report provides insufficient information to reflect that climate change considerations directly linked to the proposed development were considered during the scoping phase and that such findings meaningfully influenced the content of the Scoping Report. In this regard, the Scoping Report and the Baseline Climate Change Report fails to include: 37.1 A preliminary quantification of the Greenhouse gas (“GHG”) emissions that will be released by the Project. The Baseline Climate Change Assessment states that “the quantification of the GHG for the Project will only be undertaken during the impact assessment phase”. This is a material omission that makes it impossible to meaningfully determine the cumulative impacts of the proposed development on the surrounding environment. The following key questions must be assessed: 37.1.1. What is the full lifecycle GHG emissions? 37.1.2 What are the direct emissions from drilling, flaring, venting, processing? 37.1.3 What are the indirect emissions from purchased electricity? 37.2 An assessment of the risk of methane leakage, indicating that, “regular pipeline leak detection surveys will be undertaken, details of which will be included in the EIA report”. The Scoping Report states that the EAP will include a rehabilitation plan in the environmental management programme as part of the decommissioning and closure phase and one of the objectives will be to “prevent future environmental issues related to fluid or gas leakage or lateral movement through the well”. This is problematic because without a preliminary indication of potential measures to mitigate the risk of methane leakage it remains unclear whether such measures will be effective and/or feasible for the EAP. The Baseline Climate Change Report fails to examine: 37.2.1 How will the risk of methane leakage be assessed. 37.2.2 Whether methane leakage is quantified using best-practice monitoring. 37.2.3 How significant methane emissions are. 37.2.4 What the expected methane leakage rate is. 37.2.5 What leak detection and repair programs are proposed (if any). 37.2.6 How emissions compare with national methane reduction commitments. 37.3 Considerations of the downstream emissions that may be linked to the proposed development, stating that “the impact assessment report will consider the ‘embedded’ carbon in bought-materials and downstream emissions”. This is a material omission that makes it impossible to meaningfully determine the cumulative impacts of the proposed development on the surrounding environment. What is required is a detailed analysis setting out: 37.3.1 What the cumulative emissions are. 37.3.2 How does the proposed development contribute to total basin or regional emissions? 37.3.3 Are other gas projects planned nearby? 37.3.4 Does the proposed

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37.2. As stated in the Scoping report, such measures will be included in the EIA Report and associated EMPr for public review and authority consideration during the EIA phase. The feasibility of which will be tested and deliberated by all stakeholders accordingly. 37.2.1 . As stated above, regular pipeline leak detection surveys will be undertaken. 37.2.2 - 37.2.6. An Air Quality and Climate Change Assessment will be undertaken in the EIA Phase with the aim to address concerns raised by I&APs. 37.3 - 37.3.4. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications and will identify the emitting sources through thorough assessments. Scope 1, 2 and 3 emissions will also be assessed in the EIA Phase. 37.3.5. Kindly refer to section 4 of the Scoping Report for proposed project infrastructure. 37.3.6. The production right area has an expected life of at least 30 years. 37.4. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications including how “the prevailing climatic conditions are predicted to change over time as per the climate change predictions”. 38 - 38.6. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change. 38.7. Kindly refer to response to item 37.3.6. 38.8. The water requirements for drilling operations will be a maximum of 70 000 litres per production well up to the depth of ~600m. 38.9. No new water abstraction licences are proposed, construction water required will be sourced from local farmers with existing and licensed allocations. 38.10. Contamination risks have been identified and will be investigated further by the Hydrogeology specialist through modelling. 39 . Statement noted. 39.1 - 39.4. Impacts and preliminary mitigation measures related to land use and overlapping right have be put forward in the Scoping Report and will further be assessed in the EIA Phase. 40. A risk-averse and cautious approach was applied as detailed in section 6 of the Scoping Report. Furthermore, preliminary mitigation measures have been proposed in section 10 of the Scoping Report. 40.1. Kindly refer to responses to items 11 and 12 above. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications and will include the likelihood of the proposed development being exposed to climate related financial risks. 40.2. Kindly refer to section 7 of the Scoping Report for alternatives considered. According to the Integrated Resource Plan (IRP) published in October 2025, South Africa will need to significantly expand locally sourced natural gas to meet future energy demands, especially as coal is phased down and renewable integration

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development create carbon lock-in? 37.3.5 Does the proposed development require new pipelines or liquified natural gas terminals? 37.3.6 What is the economic lifetime of associated infrastructure? 37.4 While climate change vulnerability is considered, the Baseline Climate Change Assessment is limited to how “the prevailing climatic conditions are predicted to change over time as per the climate change predictions”. The Scoping Report fails to identify how the proposed development itself may impact climatic conditions in the area. Therefore, the mitigation measures proposed in the Scoping Report are limited to only those measures that can be implemented to prevent the predicted climate condition changes from adversely impacting the proposed development. 38 There lacks a thorough assessment of the baseline climate for the proposed development, without any ranges provided, and percentiles of these ranges prescribed. In this regard: 38.1 How will climate hazards affect the proposed development? 38.2 Are there any flooding risk (due to proximity to wetlands / watercourses)? 38.3 Have the heat stress impacts on infrastructure been considered? 38.4 How will water scarcity affect operations? 38.5 Is the proposed infrastructure climate-resilient? 38.6 What future climate projections are used or does the proposed development rely on historical data only? 38.7 What is the design lifetime of the proposed infrastructure and how is the infrastructure lifespan affected by projected climate conditions? 38.8 How much water is required for the proposed development? 38.9 Will water withdrawals compete with nearby renewable energy facilities and/or agricultural land use? 38.10 Will contamination risks reduce land suitability for renewable energy facilities? 39 The Baseline Climate Change Assessment indicates that once the EIA is undertaken, it will include a “recommendation of mitigation and management measures”. Crucial issues to be addressed include investigating impacts and mitigation measures associated with: 39.1 Land use conflicts with renewable energy facilities, namely has the site been earmarked for renewable development? If so, does the proposed development overlap with identified renewable energy corridors and/or grid expansion areas for renewable energy facilities? 38.2 Does gas infrastructure constrain renewable deployment? 39.3 Are there buffer zones that sterilise land for other uses? 39.4 Will the proposed development crowd out renewable investment? 40 The approach adopted in the Scoping Report is in direct conflict with the precautionary principle and a risk-averse approach. Where the potential adverse climatic impacts of a project are unknown the precautionary principle and risk-averse approach is best adopted by setting out preliminary mitigation measures that the EAP is willing and able to implement should any adverse risks arise. The Scoping Report identifies insufficient information to reflect that climate change considerations directly linked to the proposed development were considered during the scoping phase and that such findings influenced the content of the Scoping Report. The postponement of such assessments to the EIA phase is not proactive, precautionary or risk-averse and leaves many questions of I&AP regarding the potential adverse impacts of the proposed development unanswered. Key questions that must be addressed include: 40.1 Does the proposed development align with climate policy? Put differently, is the proposed development consistent with nationally

accelerates. Natural gas is positioned as a transition fuel to complement renewables. Current imports from Mozambique’s Pande-Temane fields will be depleted by 2028, increasing the demand for locally sourced gas to reduce reliance on imports and ensure energy security. 40.3. The project will have limited temporary and permanent employment opportunities for the locals which cannot yet be quantified. 40.4 – 40.5. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications and will assess these concerns. 40.6. No, the proposed gas activities can coexist with existing land uses in the area. 40.7. Yes, Scope 1, 2 and 3 emissions will be quantified in the EIA Report. 40.8 – 40.12. The detailed EIA phase Climate Change Assessment study will align with the draft National Guideline for the consideration of Climate Change Implications. The concerns highlighted here will be assessed.

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determined contributions / net-zero commitments / carbon budgets? 40.2 Was a no-project alternative assessed? Were renewable energy or demandside alternatives evaluated? Is there evidence the proposed development is needed for energy security? 40.3 How many long-term employment opportunities does the proposed development create versus employment opportunities created by renewable energy facilities? Are any renewable energy facilities' employment opportunities displaced? 40.4 Does the proposed gas activities shift climate burdens to future generations? 40.5 Is the proposed gas activities compatible with climate targets? 40.6 Does the proposed gas activities undermine renewable energy expansion in the area? 40.7 Are emissions fully quantified across the lifecycle? 40.8 Are cumulative and lock-in effects assessed? 40.9 Have lower-carbon alternatives been genuinely considered? 40.10 Is the proposed development resilient to future climate risks? 40.11 Does the proposed development support a just energy transition? 40.12 Could exploration increase ecosystem vulnerability to climate change?

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WATER IMPACTS 53 The Scoping Report has included, and been informed by, several baseline assessments that identify material information necessary to inform the EIA process. The purpose of the Scoping Report, namely to clarify the potential impact that the proposed development may have on both groundwater and surface water resources and identify measures the EAP proposes to mitigate any adverse impacts, has not been fully realised. 53. We respectfully disagree with this assertion. Kindly refer to section 9 and 10 for the identification and assessment of both groundwater and surface water impacts in the Scoping Report. Surface Water Impact Concerns 54. Regarding the impact that the proposed development may have on surface water resources in the area, the Scoping Report identifies the following: 54.1. Appendix A to the Scoping Report illustrates how the proposed wells will intersect with the Maselspruit River. 54.1. Statement noted. 54.2. The Scoping Report states that “the study area overlaps with multiple wetlands and river ecosystems identified by the South African Inventory of Inland Aquatic Ecosystems spatial dataset”. The Scoping Report and the Biodiversity Screening Report fails to identify the number of wetlands that stand to be impacted. This is a material omission given that the maps provided in Annexure A suggest that at least 36 wetlands fall within the production right application area. While three of the maps provided in Annexure A clearly set out the path and location of the proposed wells, the only map that identifies impacted wetlands fails to include any mapping of the proposed wells. Given that the other maps include the path and location of the proposed wells, a map indicating the location of the wetlands within the production right application area should have been made available. Without such a map, that includes the location and area of both the wetlands

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53. We respectfully disagree with this assertion. Kindly refer to section 9 and 10 for the identification and assessment of both groundwater and surface water impacts in the Scoping Report. 54.1. Statement noted. 54.2. The number of wetlands that may be impacted will be determined only when the final infrastructure locations are determined. As stated in the Scoping Report, a corridor assessment approach will be followed. This will allow for Biodiversity sensitivities to be determined and avoided as far as possible. A full Freshwater and Wetlands Assessment will be undertaken to delineate watercourses and wetlands within the study area. A map indicating the location of the wetlands within the production right application area will therefore be presented in the EIA Phase. The path and location of the proposed wells presented in the Scoping Report is preliminary and may change post detailed specialist assessments in order to avoid identified sensitivities. The statement “no seismic nor drilling activities are permitted on or near watercourses” is not strictly true in South African law. It is an over-simplification. The reality is that such activities are restricted and regulated, but not absolutely prohibited in all cases. 54.2.1 - 54.2.3. This will be quantified by the full Freshwater and Wetlands Impact Assessment and EIA Report. The final infrastructure layout has not been determined yet. 55. Kindly refer to section 9 and 10 for the identification and assessment of both groundwater and surface water impacts in the Scoping Report. We respectfully disagree with the statement – “It is inadequate to combine a soil, agricultural, freshwater and terrestrial biodiversity assessment into one report”. Biodiversity is interlinked and there is great value in the collaborative effort of holistic assessments. 55.1. Yes, as indicated in section 3 of the Scoping Report neighbouring landuse in the surrounding of the proposed project comprises predominantly of agriculture

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and the proposed wells, it is impossible for I&AP to determine if the proposed wells will intersect with, or impact, any wetlands in the production right application area. Such an omission is a fatal flaw given that, “no seismic nor drilling activities are permitted on or near to watercourses”. Yet, the Scoping Report contradicts this prohibition by stating that, “some production wells and seismic transects are proposed within and/or in proximity of watercourses and wetlands” With regard to the mapping and information provided on wetlands that may be impacted by the proposed development, the following specific issues of concern must be evaluated: 54.2. The number of wetlands that may be impacted will be determined only when the final infrastructure locations are determined. As stated in the Scoping Report, a corridor assessment approach will be followed. This will allow for Biodiversity sensitivities to be determined and avoided as far as possible. A full Freshwater and Wetlands Assessment will be undertaken to delineate watercourses and wetlands within the study area. A map indicating the location of the wetlands within the production right application area will therefore be presented in the EIA Phase. The path and location of the proposed wells presented in the Scoping Report is preliminary and may change post detailed specialist assessments in order to avoid identified sensitivities. The statement “no seismic nor drilling activities are permitted on or near watercourses” is not strictly true in South African law. It is an over-simplification. The reality is that such activities are restricted and regulated, but not absolutely prohibited in all cases. 54.2.1. What is the total number of wetlands that stand to be impacted by the proposed development? 54.2.1 - 54.2.3. This will be quantified by the full Freshwater and Wetlands Impact Assessment and EIA Report. The final infrastructure layout has not been determined yet. 54.2.2. Are any of the wetlands that stand to be impacted by the proposed development protected under provincial conservation plans? 54.2.3. What number of production wells and seismic transects are proposed within and/or in proximity of watercourses and wetlands? 55 Despite acknowledging that the proposed development will impact several surface water resources, and identifying the risk of surface water 55. Kindly refer to section 9 and 10 for the identification and assessment of both groundwater and surface water contamination, sedimentation and erosion as a significant negative impact of the proposed development, the EAP has failed to conduct an independent preliminary freshwater assessment to determine the extent to which these surface water resources may be adversely impacted and the extent to which such adverse impacts could be avoided or mitigated. It is inadequate to combine a soil, agricultural, freshwater and terrestrial biodiversity assessment into one report. These reports must be separated and dealt with in their own respect to meaningfully assess, investigate and understand the adverse impacts that the proposed development may have on each individual component. The Biodiversity Screening Report fails to provide I&AP with material information necessary to comment on the proposed development and indicate that the EAP sufficiently assessed the potential adverse impacts of the proposed development and propose feasible and effective measures to mitigate these impacts. The omission of an independent baseline freshwater assessment is problematic because the insufficient information and mitigation

activities with mining activities to the southwest 55.2 - 55.5. A full Hydrogeological Impact Assessment will be undertaken in the EIA Phase which aims to further address the risk of water contamination. Kindly refer to section 12 for the Specialists Impact Assessment inputs / Plan of Study. 55.6. Kindly refer to response to item 55.2 – 55.5 above. An emergency response plan will be developed. An emergency preparedness / response plan will be drafted as part of the EMPr which will include all identified emergency protocols. 55.7. Kindly refer to section 9 and 10 for the identification and assessment of both groundwater and surface water impacts in the Scoping Report. All identified impacts will be assessed further in the EIA Phase with the assistance of specialist studies where required. 55.8 – 55.10. All identified impacts will be assessed further and where relevant updated in the EIA Phase with the assistance of specialist studies where required. 56 - 56.4. Several different types of drilling fluids exist and the determination of which is used is dependent on the geology, drilling method, environmental constraints, regulatory requirements, etc. The concerns raised herein are acknowledged and will be included in the EIA assessments. 57. Stormwater runoff and associated impacts have been identified and assessed in section 9 and 10 of the Scoping Report. All identified impacts will be assessed further and where relevant updated in the EIA Phase with the assistance of specialist studies where required. 57.1. Kindly refer to section 10 for the preliminary mitigation measures identified. All identified impacts will be assessed further and where relevant updated in the EIA Phase with the assistance of specialist studies where required. 57.2. Effectiveness of measures proposed are subject to independent audits and revision if deemed necessary 57.3. A detailed Hydrological Study and Stormwater Management Plan will be developed. 58. Final risk significance determined in the Scoping Phase are preliminary and subject to change where required post detailed / site specific assessments. Kindly refer to section 10 for the preliminary mitigation measures identified. All identified impacts will be assessed further and where relevant updated in the EIA Phase with the assistance of specialist studies where required.

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measures provided in the Biodiversity Screening Report makes it impossible to determine critical information. With regard to the proposed development's impact on surface water resources, the following specific issues of concern must be evaluated: 55.1. The Scoping Report indicates that the study area for the proposed development encompasses several quaternary catchments of the Vaal Water Management Areas. Are there other mining, agricultural or industrial activities in the identified catchments? 55.2. How will the EAP assess the proposed development's impacts and propose mitigation measures that meaningfully address the risk of surface water contamination if salinity increases in the surrounding land particularly in the areas where the proposed wells will be located? 55.3. How will the EAP assess the proposed development's impacts and propose mitigation measures that address the risk of surface water contamination if a sump pit were to leak? The omission of such information is particularly concerning given the fact that the Scoping Report identifies a sump pit as one of the design or layout alternatives and acknowledges that the risk of contamination of aquatic systems.³⁹ 55.4. How will the EAP assess the proposed development's impacts and propose mitigation measures that address the risk of surface water contamination from seepage into groundwater due to sump pits being unlined and/or poorly managed? 55.5. How will the EAP assess the proposed development's impacts and propose mitigation measures that address the risk of surface water contamination if salinity increases in the surrounding land? 55.6. How will the EAP assess the proposed development's impacts and propose mitigation measures that address the risk of surface water contamination from chemical additives? While the Scoping Report claims that "mitigation measures have been put in place to ensure the proper handling of hazardous waste including drilling fluids, sumps and potential water formation", it fails to specify what such mitigation measures include. Such mitigation measures are limited to "the storage of hazardous waste in lined aboveground tanks adjacent to the drill rig for a maximum period of 90 days, after which it will be removed from site and adequately disposed of at an appropriately licenced waste disposal facility". This is inadequate as the identified measures fail to provide positive assurance of mitigating tank leaks or similar emergency incidents. The Scoping Report fails to set out a proposed emergency response plan or similar containment measures if these hazardous substances were to spill on site or during transportation. The Scoping Reports comment that "hazardous substances will follow strict containment and spill prevention protocols" is inadequate and fails to specify what such protocols would entail, making it impossible to determine the feasibility and effectiveness of such protocols. 55.7. How will the EAP assess the proposed development's impacts and propose mitigation measures that address the risk of surface water impacts caused by increased sedimentation from site clearing? 55.8. How will the EAP assess the proposed development's impacts and propose mitigation measures that address the risk of surface water impacts caused by the alteration of natural drainage patterns? This is particularly concerning given that the proposed development "is situated in the primary catchment of the Vaal River drainage system". 55.9. How will the EAP assess the proposed development's impacts and propose mitigation measures that address

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the risk of surface water impacts caused by accidental fuel or chemical spills? The Scoping Report claims that “mitigation measures have been put forward to prevent pollution on or near to the drill sites which will prevent contaminates surface water runoff from entering water resources”, but fails to stipulate what these measures include. The Scoping Report fails to identify mitigation measures that directly relate to preventing contamination from surface water runoff. If the EAP is suggesting that the other mitigation measures set out in the Scoping Report are sufficient to cover this risk, full reasons should be given as to why such a conclusion is justified. 55.10. How will the EAP assess the proposed development’s impacts and propose mitigation measures that address the risk of contaminated surface water adversely impacting drinking water supplies and agricultural activity? This is particularly concerning given the fact that the Scoping Report acknowledges that “the proposed study area is situated within an area dominated by mining activities, crop farming and grazing” and that contaminated surface water “puts strains on local and regional drinking water supplies”. 56. The Scoping Report fails to specify what chemicals the EAP intends to use in the drilling fluids. While the Scoping Report states that “biodegradable drilling fluids should be used wherever possible”, it fails to specify the extent to which this would be possible for the proposed development and, where it is not possible, what alternative drilling fluids will be used and their potential adverse impacts on the water resources and surrounding environment. With regard to the content of drilling fluids, the following specific issues of concern must be evaluated: 56.1. When would it be possible to use biodegradable drilling fluids? 56.2. When would it not be possible to use biodegradable drilling fluids? 56.3 What alternative drilling fluids will be used where it is not possible to use biodegradable drilling fluids? 56.4. What is the potential impact of any alternative drilling fluids that may be used? 57. Despite anticipating an increase in stormwater runoff during the operational phase that “could result in contamination of the systems, transporting diesel, hydrocarbons and soil from the operational areas”, the Scoping Report fails to propose any measures to manage and mitigate the anticipated stormwater runoff on site or the adverse consequences of such runoff to the soil and water resources. The Biodiversity Screening Report suggests that such measures will only be determined during the EIA as “a freshwater specialist should be consulted for the delineation of wetlands identified within the PAOI as well as suitable mitigations and recommendations”. This is a material omission in the Scoping Report as it remains unclear whether the EAP intends to implement any measures to control or mitigate stormwater runoff. Despite anticipating several adverse impacts connected with increase stormwater runoff, the Scoping Report fails to specify whether a stormwater management plan will be required as part of the proposed development, vaguely stating that “stormwater management controls will be implemented”. With regard to stormwater runoff, the following specific issues of concern must be evaluated: 57.1. What measures will be proposed to manage and mitigate the anticipated stormwater runoff on site? 57.2. How will the effectiveness and feasibility of any measures proposed to manage and mitigate the anticipated stormwater runoff on site be determined? 57.3. Will a Stormwater Management Plan be required as part of the

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proposed development and how will it be implemented? 58. Despite all of the above, the Scoping Report concludes that the final risk significance of habitat destruction during the construction phase is “medium to low” and the risk of sedimentation of watercourses is considered “very low since seismic activities/drilling is prohibited on or near watercourse”. The significance rating is unjustifiable in these circumstances as the EAP must motivate the reasons for this unsubstantiated conclusion. The mitigation measure that, “construction duration should be minimised to as short a term as possible to reduce the period of soil disturbance” is insufficient. While the proposed development may ensure that construction duration “is as short a term as possible”, but soil erosion and sedimentation occur within that vague period of time it cannot be said that the EAP has provided a meaningful mitigation measure.

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PUBLIC PARTICIPATION PROCESS 41 With respect to the public participation process undertaken to-date, and those yet to be undertaken should the proposed development proceed to the further stages of the EIA process, please confirm the following: 41.1 Was the public participation process conducted in accordance with NEMA, the EIA Regulations and the Constitution? 41.2 How were stakeholders identified? These stakeholders include farmers (within and outside of the gas exploration area), traditional authorities, municipalities, non-governmental organisations, renewable energy companies etc. 41.3 Were vulnerable and marginalised groups identified and intentionally catered for? If so, how? 41.4 Were community leaders and land claimants properly consulted? 41.5 Are all materials relating to the proposed development translated into local languages? 41.6 How are illiterate and low-literacy participants accommodated? 41.7 Were virtual participation options for public meetings available? 41.8 Were independent specialists available at the public meeting to answer community questions? Were answers to questions explained in understandable terms? 41.9 Was baseline environmental data shared? 41.10 Were financial interests and ownership structures disclosed? 42 The public participation process for the scoping phase of the proposed development has proven to be deficient given the poor turnout for the public meeting held on 18 February 2026. With respect to advertisement of the proposed development, confirm the following: 42.1 Was the advertisement of the proposed development limited to predominantly site notices, on a relatively remote site approximately 15km from Virginia, 28km from Welkom, 13km from Ventersburg and 21km from Theunissen? How will this be improved going forward? 42.2 Is the type of method used for public notification of the proposed development an appropriate or effective method of communication for activities of this nature and scale of the affected area? 42.3 Will the public notification system employed for the proposed development be better tailored to the scale of

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41 – 41.2. The public participation process for the proposed project is being undertaken in accordance with the requirements of the MPRDA and the stipulated requirements in Chapter 6 of NEMA EIA Regulations, 2014 as amended, and in line with the principles of Integrated Environmental Management (IEM). Refer to Section 8 and Appendix C of the Scoping Report. Also refer to the response on item 1 above. 41.3. Refer to Section 8 and Appendix C of the Scoping Report for detail on the public participation undertaken. 41.4. All pre-identified I&AP consulted and given an opportunity to participate in the EIA process. 41.5. Yes. Materials were translated into 3 languages (English, Afrikaans and Sesotho). 41.6. Various communication mechanisms are made available to participants. These include oral communications via telephone and during public meetings. Non-technical executive summaries in 3 different languages were also made available. Visual maps and diagrams were also provided as an Appendix to the report. 41.7. Yes, virtual options were made for those I&APs who cited transportation challenges. 41.8. Baseline Specialist Assessments were all done at a desktop level. Specialists will be attending the EIA Phase public meeting. 41.9. Baseline data is available in section 9 of the Scoping Report. 41.10. Please can you advise on who’s financial interests and ownership structures you are referring to and disclosed to whom? 42 – 42.4. Public turnout cannot be used as a measure of a public meeting success or failure. The purpose of the meeting as highlighted during the meeting is as follows: • Present and contextualize the proposed development to the I&APs • Outline the licensing requirements • Outline the involvement of Interested and Affected Parties • Provide update on project progress • Highlight the way forward and key next phases in the project • Record issues raised by I&APs Kindly refer to the Public Meeting Minutes attached as Appendix C. The public participation process was not limited to advertisement and the placement of notices. Chapter 6 of the NEMA EIA Regulations sets forth the minimum requirements for public participation. A comprehensive public participation process was undertaken which in many respects exceeds the

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potential impact or communities in the affected environment? 42.4 How will the EAP ensure the reach of the advertisements in the poorer communities in the vicinity of the proposed development? 42.5 Were specific community members and traditional leaders contacted to ascertain whether there are community organisations that could assist in the word of mouth and advertisement of the proposed development and associated public meetings? 42.6 Was a network or chain referral system employed where community organisations were specifically approached to assist in identifying other key stakeholders for dissemination of key information and notification of public participation opportunities? 42.7 Will the advertisements remain limited to English, Afrikaans and Sesotho? This is critical given the fact that the predominant languages spoken in the area are Sesotho, Afrikaans and isiXhosa, with English generally only serving as a language of business and administration. 42.8 Were the public participation process and public meeting announced on a local radio station in a local language at an appropriate time where I&APs would be most likely to receive notification? 43 With respect to the participation of I&APs during the public meeting: 43.1 Were participatory rural appraisal and participatory learning techniques employed to build the capacity of the local communities to engage and participate more effectively in the public participation process? 43.2 The public meeting was not at a suitable time and venue resulting in I&APs being curtailed from participation merely because the meeting on the Wednesday 18 February fell between 15:00 and 17:00 which are working day hours. As indicated above, no meaningful participation was facilitated as the public meeting was not accessible to the communities due to the location of the meeting and the financial constraints to travel to Harmonie. 43.3. Were questionnaires or opinion surveys handed out to I&APs that attended the public meeting on 18 February 2026? Should this be done in any future public meeting relating to the proposed development, these questionnaires or opinion surveys should be in appropriate languages, and should be conducted in a way that caters for those that are illiterate or are hindered in any respect from substantially and meaningfully providing responses thereto. 43.4 Was a translator available at the public meeting for those I&APs whose home language is not English? 43.5 How did the inputs of I&APs during the public meeting inform the assessment of the proposed development with respect to project scope, alternatives and other key issues? 43.6 How was the level of public participation informed by the communities' perception on the scale of anticipated impacts of the proposed development, the sensitivity of the affected environment, the degree of controversy of the proposed development and the characteristics of the potential I&APs? 43.7 How were I&APs from poorer communities assisted in attending the public meeting? We note here that the meeting on 18 February 2026 was inaccessible to many I&APs that did not live in Virginia and were able to afford transport to Harmonie Primary School for the purpose of attendance. 43.8 Were public meetings held in more than one area? Particularly in surrounding communities where fees for transport is not a possibility to reach a public meeting in a different town. 43.9 The failure to host more than one public meeting prevented community members from being able to walk away from a meeting, digest the significant amount of technical and

minimum requirement for PPP as set forth in Chapter 6 of the NEMA EIA Regulations. Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement. 42.5. Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement and stakeholders contacted during the process. 42.6. Kindly refer to responses to items 42.4 and 42.5 above. 42.7. As stated in the Scoping Report, the proposed project is located in Wards 1, 3, and 4 of the Matjhabeng Local Municipality and Ward 6 of the Masilonyana Local Municipality that both forms part of the Lejweleputswa District Municipality in the Free State Province (2016 municipal boundaries). The majority of people in the area under investigation have Sesotho as home language. Although isiXhosa is widely spoken in the Lejweleputswa District Municipality, Sesotho remains the mostly commonly spoken language in the study area. Refer to section 9.4.2.3 of the Scoping Report and Section 5.2.4 of the associated Social Impact Specialist Report. 42.8. Kindly refer to responses to items 42.1 - 42.4 above. 43 – 43.3. Kindly refer to the attached meeting minutes for the details of the proceedings. The concerns regarding the accessibility of the venue and time are acknowledged. In selecting a venue, the EAP aimed to prioritize locations closest to communities or stakeholders likely to be affected by the project. For this particular project, the zone of influence (or area to be affected) is primarily localized around the application area, and no formal towns or settlements are within this zone. The closest main town is Virginia (where the meeting was held). The EAP chose a venue (public school) which was assumed to be central to the town of Virginia the most reasonable and practical location for a broader meeting venue. The EAP also offered to provide an MS Teams link to those community members who cited transport challenges to join and participate virtually. It was however, acknowledged that those in attendance were of the view that future meetings should also be organised in Meloding Township to accommodate those who cannot afford transport, to which the EAP agreed. The EAP will also consider organising open days in order to accommodate I&APs who cannot attend the meeting at a particular time. Comment sheets and non-technical executive summaries in 3 different languages were made available during the public meeting. 43.4 – 43.6. The EAPs and client representatives who were in attendance were conversant in the local languages and able to translate if the need arose. As such, a translator was deemed necessary. Robust engagements between the EIA team and the I&AP took place during the public meeting, which assisted the EAP with identification of additional key impacts for assessment and consideration in the Final Scoping and subsequent EIA. 43.7 - 43.9. The EAP offered to provide an MS Teams link to those community members who cited transport challenges to join and participate virtually. It was however, acknowledged that those in attendance were of the view that future meeting should also be organised in Meloding Township to accommodate those who cannot afford transport, to which the EAP agreed. The concerns regarding the accessibility of the venue are acknowledged with the aim of addressing these in time for the subsequent EIA Phase public meetings. One public meeting was held during the Scoping Phase. However, it was noted that additional meetings and/or open days should be organised during the EIA phase to accommodate from different areas within proximity of the

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complex information, and return with further queries or questions that were not asked at the single public meeting in Virginia. How will this be improved in further iterations of the public participation process for the proposed development? 43.10 How are focus group meeting deemed to be “as and where necessary”. 43.11 Will further iterations of the public participation process for the proposed development ensure the provision of more than one meeting in different areas, and will community attendance be catered through the provision of transport to these meetings? 43.12 Were renewable energy developers that stand to be impacted by the proposed development specifically approached? 43.13 Was a focussed public meeting with renewable energy developers in the area provided? 44 Further to the public participation process undertaken to date: 44.1 Were key I&APs within surrounding communities able to obtain clear, accurate and easily understandable information about the environmental impacts of the proposed gas activities which, although not assessed to the finest scale, are nevertheless generally known to Motuoane who, expectedly, have an extensive and in-depth understanding of the potential impacts of a project of this nature? 44.2 Were community role players provided an opportunity to voice their support, concerns, queries, local knowledge regarding the proposed development, application or decision? 44.3 Were community role players provided an opportunity to provide suggestions regarding those ways for reducing or mitigating any negative impacts of the proposed development and for enhancing its positive impacts? 44.4 Were I&APs provided an opportunity to incorporate their needs, preferences and values into the proposed development? 44.5 Were community members provided an opportunity to clarify any misunderstandings as to community dynamics, local buy-in or lack of support, and past experiences of projects of a similar nature? 45 Please explain how the public participation process efficacy is going to be determined by the EAP during the EIA phase with reference to the following measurable indicators: 45.1 Number of meetings held; 45.2 Locations of meetings to be held; 45.3 Languages in which these meetings will be held; 45.4 Number of independent specialists at public meetings; 45.5 Number of written comments received; 45.6 Percentage of comment substantively addressed; and 45.7 Changes made to the project scope as a result of public input. 46 Meaningful public participation in the context of NEMA applications is not merely procedural formality but a substantive constitutional requirement grounded in the Constitution and the principles in section 2 of the NEMA which require transparency, accountability, participation of I&APs, and environmental justice. 47 Although the Applicant may have technically complied with the minimum consultation requirements prescribed in the EIA Regulations (e.g., newspaper notices, site notices, and notification to registered I&APs), compliance with the EIA Regulations must be substantive and fit for purpose, not mechanical or minimal. The Constitutional Court has repeatedly affirmed that public participation must be real, not illusory. Mere procedural compliance is insufficient where the scale and risk profile of a project demand enhanced engagement. The bare minimum approach to public participation is inadequate in this case for three main reasons: 47.1. The proposed development involves large-scale gas production

development. 43.10. Focus group meetings are considered “as and where necessary” when the EAP determines that certain stakeholders require targeted engagement beyond general public meetings. 43.11. Kindly refer responses to items 43.7 – 43.9 above. Unfortunately, we are not in a position to arrange transport for attendees. Providing transport could create liability and safety responsibilities that the Applicant and EAP cannot manage fairly or consistently for all stakeholders. 43.12. As indicated above, the Applicant has directly approached the renewable energy developers within the PR. Engagements with these stakeholders was initiated prior to the submission of this application and is ongoing. 43.13. In view of the above a focus group meeting was not arranged with renewable energy developers. However, they were pre-identified, invited to comment on the Application as well as invited to the public meeting. Focus group meetings can be arranged with renewable energy developers during the EIA stage if required/requested. 44.1 – 44.5. Kindly refer to responses to items 42.1 - 42.4 above. 45 – 45.7. Chapter 6 of the NEMA EIA Regulations sets forth the minimum requirements for public participation. A comprehensive public participation process was undertaken which in many respects exceeds the minimum requirement for PPP as set forth in Chapter 6 of the NEMA EIA Regulations. Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement. Determining public participation efficacy is beyond the scope of the EAP. 46. The public participation process for the proposed project is being undertaken in accordance with the requirements of the MPRDA and the stipulated requirements in Chapter 6 of NEMA EIA Regulations, 2014 as amended, and in line with the principles of Integrated Environmental Management (IEM). Refer to Section 8 and Appendix C of the Scoping Report. Also refer to the response on item 1 above. 47 – 47.3. Chapter 6 of the NEMA EIA Regulations sets forth the minimum requirements for public participation. A comprehensive public participation process was undertaken which in many respects exceeds the minimum requirement for PPP as set forth in Chapter 6 of the NEMA EIA Regulations. Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement. Determining public participation efficacy is beyond the scope of the EAP. 48 – 50. We respectfully disagree with the assertion disproportionality and mismatch you have raised. Quite to the contrary, the meeting fulfilled its meaningful participatory objective where the EAP also gained insights that are instrumental to the EIA process from the affected and adjacent community. The proposed PR application area does not have an extensive geographical footprint in relation to the exploration right in which it is located. The proposed infrastructure footprint is even fractions smaller than the PR application area. 51- 51.5. The public participation process was not limited to advertisement and the placement of notices. Chapter 6 of the NEMA EIA Regulations sets forth the minimum requirements for public participation. A comprehensive public participation process was undertaken which in Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement. Determining public participation efficacy is beyond the scope of the EAP. Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement. Determining public participation efficacy is beyond the

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activities with potentially significant environmental, social, economic, and climate impacts. 47.2 The geographic area affected is extensive and includes multiple communities, land users, and vulnerable groups. 47.3 The impacts are long-term and potentially irreversible. 48 The public participation process undertaken to date is marked by disproportionality between project scale (of the gas production activities) and consultation effort by the EAP in ensuring meaningful public participation in the context of the subject NEMA application because the scale, complexity, and potential risk of gas production activities are high. The scoping phase is foundational: it determines which impacts will be assessed and which alternatives will be considered. 49. This creates a clear mismatch: *TABLE* 50 This mismatch renders the consultation process inappropriate and disproportionate. 51 Gas production projects affect local communities (including rural and potentially vulnerable populations), farmers and landowners, land users, municipal authorities, downstream users and neighbouring provinces/regions. As the consultation to date relied primarily on newspaper advertisements with limited circulation, site notices in remote areas, online document access without digital accessibility considerations, meaningful access was effectively curtailed. If stakeholders are not meaningfully engaged at scoping stage, the entire EIA process becomes structurally compromised. Courts have recognised that defects in public participation at an early stage cannot easily be cured later. Where scoping was inadequately advertised or insufficiently explained, affected parties are denied the opportunity to influence the terms of reference of the Environmental Impact Report. In this context, minimal procedural compliance and given the deficiencies the scoping phase should be readvertised. Expanded notice mechanisms should be employed, including: 51.1. Regional and community radio; 51.2 Multilingual notices beyond English, Afrikaans and Sesotho; 51.3. Direct engagement with traditional authorities and municipalities; 51.4. Public meetings in affected areas; and 51.5. Extended comment periods. 52 A revised scoping report should reflect new input before proceeding to EIA phase to ensure that the public participation process is proportionate to the scale, sensitivity, and long-term implications of the proposed gas production activities. In matters of large-scale gas production with potentially wide-ranging environmental and socio-economic consequences, mere technical compliance with the minimum public participation requirements under the EIA Regulations is insufficient. Where consultation is not tailored to the scale, complexity, and geographic reach of the proposed activity, it fails the constitutional test of meaningful participation. Accordingly, the scoping process should be set aside or re-opened and re-advertised to ensure that public participation is genuinely fit for purpose, proportionate, and aligned with the principles of NEMA and the Constitution.

scope of the EAP. many respects exceeds the minimum requirement for PPP as set forth in Chapter 6 of the NEMA EIA Regulations. Kindly refer to section 8 and Appendix C of the Scoping Report for the full details of the stakeholder engagement. 52. We respectfully disagree with the assertion disproportionality. Kindly refer to response to item 51 above.

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Ground Water Impact Concerns 59. Regarding the impact that the proposed development may have on groundwater resources in the area, the Scoping Report identifies the following: 59.1. 3 aquifers are believed to exist in the saturated zone. 59.2. According to the Baseline Geohydrological and Groundwater Impact Assessment, “the Project area is underlain by a minor aquifer with a moderate vulnerability rating and a medium susceptibility rating”. 60 Despite identifying sensitive receptors and potential impacts on groundwater associated with the operational phase activities, the Scoping Report states that “the potential contamination of groundwater through drilling is a risk without proper mitigation measures in place”. The conclusion that the risk of groundwater contamination during operational phase is “medium to low”, and there is a “low negative cumulative significance through the implementation of mitigation measures” is unsubstantiated and unjustifiable when there are no measures that have been proposed to mitigate groundwater contamination caused by drilling. 61. The following material shortcomings illustrate the extent to which the Scoping Report provides insufficient information to determine whether the proposed development will adversely impact groundwater in the area and the extent to which such adverse impacts can be mitigated: 61.1 Despite acknowledging that certain proposed gas activities “may result in the alteration or reduction of groundwater levels on site”, the Scoping Report fails to provide adequate information on the impacts of such alteration or reduction. 61.2 What is the potential impact that groundwater contamination may have on agricultural productivity and drinking water supplies? The omission of this information from the Scoping Report is particularly concerning given the fact that the Scoping Report acknowledges that “the proposed study area is situated within an area dominated by mining activities, crop farming and grazing”.59 61.3. Despite acknowledging the risk that “spills/leaks can then infiltrate into the groundwater and contaminate the water resource”,60 the Scoping Report fails to provide adequate information to identify and mitigate the migration of methane into the groundwater. What measures are proposed to mitigate the migration of methane into the groundwater? 61.4. What adverse impacts may a well workover, as the measure identified by the EAP to prevent groundwater contamination from well casing failure, have on the water resources and surrounding environments? 61.5. Are communities dependent on shallow groundwater? Water Use and Mitigation Concerns 62. The Scoping Report indicates that water will be used for the following proposed gas activities: 62.1 “Dust suppression measures will be implemented during construction, including water spraying where necessary” 62.2. “Water required for the operation of the drilling rig, as well as potable water will be obtained locally. Water requirements for drilling operations will be a maximum of 70 000l per production well up to the depth of 600m”. 62.3. “The utilisation of groundwater for drilling and other associated activities may result in the alteration or reduction of groundwater levels on site thereby affecting local user”. 63. The Scoping Report fails to deal with fundamental water use issues in relation to the proposed development and the following specific issues of concern must be evaluated: 63.1. What is the entire scope of the anticipated water use requirements? 63.2

59 – 59.2. Statement noted. 60 – 61.5. Kindly refer to section 10 for the preliminary mitigation measures identified. All identified impacts will be assessed further and where relevant updated in the EIA Phase with the assistance of specialist studies where required. The impacts on Surface and Groundwater Quality and Quantity have been identified and assessed in Section 10.3 of the Scoping Report. Furthermore, detailed Aquatic Biodiversity and Wetland Impact Assessment as well as Geohydrological Assessments will be undertaken in the EIA Phase. Furthermore, local investigations including but not limited to groundwater characterisation and hydrocensus are underway, the results of which will be presented in the detailed Hydrogeological Assessment Report during the EIA phase. Kindly refer to section 10 for the preliminary impacts and mitigation measures identified. All identified impacts will be assessed further and where relevant updated in the EIA Phase with the assistance of specialist studies where required. 62 – 62.2. Statement noted. 62.3 – 63.2. It is important to note that no new abstraction applications will be made, and water will be sourced / bought from locals who already have licenced allocations. 63.3. As stated in your opening statement, dust suppression measures will be implemented during construction, including water spraying where necessary. However, the bulk of the water will be used for drilling operations where it will form part of the drilling fluids. 63.4 – 63.6. Kindly see response to item 62.3 above. Water sourced from licenced farmers should not place an additional burden on the reserve or other users. 63.7 – 64. Kindly see response to item 62.3 above. 65. Statement noted. 65.1 – 65.4. Assessment of cumulative impacts is a requirement under the NEMA EIA Regulations and forms part of EIMS’s Impact Assessment Methodology. Cumulative impacts will be assessed by all specialists including the Hydrogeology specialist and the EAP during the compilation of the detailed EIA reports. 65.5. Kindly see response to item 62.3 above. 65.6. Kindly see response to item 62.3 above. Water sourced from licenced farmers should not place an additional burden on the reserve or other users. 66. Statement noted 66.1. Water is used during drilling operations and forms part of the drill mud. 66.2. Domestic water needs per person in office settings are typically ~15– 25 litres per person per day. With less than 10 field staff at the workshop per day this works out to 150 – 250 litres which will also be sourced from local suppliers. 66.3 – 66.4. No additional water will be required. All water needed for the drilling activity including cooling is accounted for in the 70000L stated above 66.5. Not expected to produce any water. 67. Assessment of cumulative impacts is a requirement under the NEMA EIA Regulations and forms part of EIMS’s Impact Assessment Methodology. Cumulative impacts will be assessed by all specialists including the Hydrogeology specialist and the EAP during the compilation of the detailed EIA reports. 68. Frequency and manner through which groundwater and surface water will be monitored can only be made post site specific assessments. As such, these will be detailed in the EMPr. 68.1 – 68.3. Monitoring frequencies will be proposed in the EMPr in consultation with specialists and /or in line with water use licences where applicable. 68.4. Surface and groundwater quality impacts have been identified post construction under the Gas Analysis and Maintenance activity with ground water monitoring highlighted as an ancillary activity. The impacts on water during closure and post closure have

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Which activities will require water use and what volumes of water will be needed? While the Scoping Report states that total amount of water that will be required to operate the drilling rig, the volumes of water obtained from surface water, or potable water is unspecified. 63.3. How will water be used for each activity that requires it? Without this information it is impossible to determine how these activities may contaminate water resources, the environmental risks associated with the use of water during these activities and whether measures can be put in place to mitigate any adverse environmental impacts that may arise. 63.4. Where will water be obtained from? 63.5 How will the proposed development’s water use impact the ecological reserve? 63.6. How will the proposed development’s water use impact farmers and local communities? 63.7. What will the method of abstracting groundwater for use during drilling and “associated activities” be? 63.8. Is the proposed water abstraction within sustainable yield limits? 64. It is currently impossible to determine the volumes of groundwater that will be used and the extent to which such use may adversely impact existing water users, such as the 16% of households in Ward 3 that get their water from boreholes. 65. The Scoping Report identifies the application of pesticides and fertilisers to the land, waste from livestock and other animals, landfills, mining operations and unintentional releases such as chemical spills or leaks from hydrocarbon tanks as existing stressors on the water resources. It is critical that the EAP identify how the proposed development may further impact already stressed water resources. With regard to stressors on the water resources, the following specific issues of concern must be evaluated: 65.1. What is the regional water stress status? 65.2. To what extent may cumulative stress on water resources reduce ecological reserve flows? 65.3. To what extent may cumulative stress on water resources degrade aquatic biodiversity? 65.4. To what extent may cumulative stress on water resources increase competition between industrial, agricultural and domestic users? 65.5. How will the EAP identify and address the typical impacts of long-term, resource stress in water-scarce regions? 65.6 To what extent will the proposed development and the associated activities impact existing water uses and water resources in the area? This is of particular concern given that the Scoping Report acknowledges that the use of groundwater may alter or reduce groundwater levels on site and affect local users. 66. The Scoping Report refers to “additional activities” that may require the use of water but fails to clarify the volumes or the purpose for which the water will be used. In this regard: 66.1. The Scoping Report indicates that “drilling mud will not be stored on site for more than 90 days”. Will water will be used during drilling mud preparation? 66.2. The Scoping Report indicates that “Motuoane plans to construct a maintenance workshop” that “will be used as an office for field staff”, amongst other things. The Scoping Report also indicates that “where demand is found to exceed supply, Motuoane will work with the accommodation suppliers to bring in additional temporary accommodation” for the works. What volumes of water will be required for such ongoing domestic water use? 66.3. The alternative diamond core drilling method proposed by the Scoping Report will require that “water and other drilling fluids [be] injected into the drill strong to prevent overheating”. What

been identified and will be assessed during the EIA Phase. Furthermore, a numerical groundwater flow and mass transport model will be developed in order to quantify and qualify the potential impact / risk of the potential saline water migration towards the shallow aquifer. The necessary mitigation and management measures will be developed. 69. As stated above, only where final sitting of infrastructure is confirmed can the water use licence be applied for. 70 – 71. Impacts on water resources have been identified and assessed. Kindly refer to section 9 and 10 of the Scoping Report.

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volumes of water will be required for this water use and how will water resources be impacted by this activity? 66.4. Will water use be required during well testing? If water is required, how much water will be needed and how will this activity will impact water resources? 66.5. Will produced water be generated during well testing? If produced water will be generated, what will the potential volume and composition of salinity, hydrocarbons and radionuclides be? Without this information it is impossible for I&AP to determine the potential adverse impacts that well testing may have on water resources. 67. How will specific water uses and cumulative water uses impact the water users downstream that rely on the water resources in the area? The omission of this information in the Scoping Report is particularly concerning given the fact that the Scoping Report has acknowledged that crop farming, agricultural farming, mining and residential activities all occur within the area and are potentially affected. 68. The Scoping Report concludes that the proposed development is “anticipated to have a low negative cumulative impact” on groundwater and surface water quality and quantity, yet the Scoping Report fails to provide sufficient information on the frequency and manner through which groundwater and surface water will be monitored. The Scoping Report states that “a monitoring programme will be proposed in the EMP for the continued monitoring of surface and groundwater quantity and quality”. With regard to monitoring, the following specific issues of concern must be evaluated: 68.1. What is the frequency at which groundwater and surface water quantity and quality will be monitored? 68.2. How will groundwater and surface water quantity and quality be monitored? Such information must include whether independent monitoring will be implemented. 68.3. How will the EAP ensure that the proposed frequency of monitoring groundwater and surface water quantity and quality be sufficient to mitigate any potential adverse impacts on water resources and water users? 68.4. What decommissioning plans will be implemented by the EAP to prevent longterm contamination from the wells and additional water use activities? The Scoping Report does not specify such information and states that “a rehabilitation plan will be included in the EMP to be submitted as part of the EIAR”.⁷¹ This is a material omission, even at the Scoping Phase, because I&AP and the competent authority have insufficient information to confirm that sufficient measures are available to prevent long-term contamination of the surrounding environment and water resources and that the EAP is able to implement such measures. 69. Do any or all of the proposed development’s activities that will use water require that the EAP obtain a Water Use Licence (“WUL”) required under section 21 of the National Water Act? The Scoping Report defers this question to a later stage by stating that “relevant WUL applications will be submitted where relevant for the triggers under the National Water Act”. 70. The result of the omissions identified above is that information directly relevant to an assessment of “the use and exploitation of non-renewable natural resources” and which takes into account “the consequences of the depletion of the resource” has not been provided in the Scoping Report. The fact that a UWL may be obtained in future by the Applicant under the National Water Act does not negate the requirements under NEMA for assessment of impacts on water resources.

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71 The EAP has a responsibility to comply with its obligations in terms of NEMA, the framework Act which regulates the environmental authorisation process. In accordance with the requirements of NEMA, all relevant information regarding bio-physical aspects and environmental impacts of the proposed development (including the surface water and groundwater impacts) must be placed before the DFFE in order for it to make a legally sound decision on this application. A decision-making process on the part of DFFE which includes all relevant factors is not possible if the impacts of the proposed development on the water resources in the receiving environment have not been assessed.

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AIR IMPACTS 72. Motuoane intends to undertake extensive exploration activities as part of their production right, gas venting and flaring is likely to occur intermittently during well clean-up and flow testing, or during emergencies, both of which carry significant harmful impacts. In this regard, confirm the following: 72.1. What are the primary sources of air emissions? 72.2. What are the adverse air impacts as a result of venting and flaring? 72.3. Does venting and flaring contribute to global warming? 72.4 Who is likely to be most impacted by the emissions as a result of venting and flaring? 72.5. What are the fugitive emission risks? 72.6. What procedures are in place for detecting and reducing leaks from valves, connectors and tanks? 72.7. Have baseline air quality indicators been identified? 72.8. What monitoring measures will be imposed to ensure the continued monitoring of air quality impacts? 72.9 Will outcomes of monitoring be made publicly available? 72.10. Will key stakeholder be identified and notified immediately in the event of an emergency? 72.11. What emergency response measures will be imposed to safeguard those likely to be impacted in light of an emergency? 72.12. What mitigation measures will be imposed that would guard against explosive gas accumulation and to ensure that this is properly managed? 73. With respect to the Baseline Air Quality Assessment: 73.1. How will the wind flow patterns in the study area and surrounds change based on seasonal 73.2. How does the EAP propose to overcome the gap in information regarding the lack of publicly accessible ambient measures in the vicinity of the proposed development? 73.3. Was air sampling undertaken? If not, is air sampling intended to be undertaken as part of further iterations of the EIA phase? 73.4. Have specific receptors been identified and consulted as part of the public participation process? 73.5. What are the long-term human and atmospheric impacts of exposure to the emissions from exploration and production activities? 73.6. What are the cumulative impacts in light of existing or planned industrial developments in the area? 73.7. What is the total carbon footprint of the proposed development? NOISE IMPACTS 74. It is unclear how the EAP found that the noise impacts of the proposed activities are “not expected to be excessive” given that no detailed noise impact

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72 - 72.12. Baseline air quality assessment was undertaken by Airshed Planning Professionals in November 2025 (Appendix F2 of the Scoping Report). Available data for the Welkom South African Weather Service Station was used to establish baseline meteorological conditions for the proposed project site. Baseline findings are indicated in Section 9.11 of the Scoping Report. Section 10.3 of the Scoping Report and Appendix G presents the preliminary air quality impact assessment and mitigation measures. Row 2 of Table 39 of the Scoping Report indicates that air quality impact assessments will be undertaken in the EIA Phase. A comprehensive Air Quality Impact Assessment will be conducted as part of the EIA Phase. The Air Quality Impact Assessment will assess all pollutants due to the project activities, including but not limited to emissions from nearby tailings, trucks, drill rigs and equipment. The Air Quality Impact Assessment will determine the significance of the impacts on surrounding sensitive receptors and recommend monitoring requirements based on the significance. 73 - 73.7. Kindly see response to item 72 above. 74. The preliminary assessment was based on baseline Noise Impact Assessment and the likelihood of noise produced by project infrastructure at various stages of the development. These preliminary findings will be assessed by a specialist in the EIA phase. 74.1 - 74.4. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment will be undertaken in the EIA Phase as detailed in the Scoping Report. 75 – 75.1. Refer to Appendix F4 of the Scoping Report 75.2 – 75.6. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. 76 -76.14. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of concern identified will be considered for evaluation by the specialist. 77 – 77.6. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of

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assessment has yet been undertaken. With regard to the potential noise impact associated with the proposed development, the following specific issues of concern must be evaluated: 74.1. Why has a noise impact assessment not been undertaken? 74.2. What equipment will be used during each phase of the proposed development and what are their expected noise levels? 74.3. What activities, if any, will occur 24 hours a day? 74.4. What is the expected duration of noisy activities? 75. With regard to the location of noisy activities and sensitive receptions, the following specific issues of concern must be evaluated: 75.1 What are the nearest residential areas, farm, schools, clinics, hospitals or places of worship in relation to the noisy activities? The Baseline Noise Report states that “the online screening tool identified two areas to have a ‘very high’ sensitivity to noise within the production right area”. 75.2. Have detailed measurements and modelling been conducted as part of the assessment? 75.3. Are there any protected areas nearby the proposed noisy activities? 75.4. Are there any sensitive ecological receptors that may be impacted by the noisy activities? 75.5. What is the current land use where the noisy activities will occur? 75.6. What is the distance between noise sources and receptors? 76. The Baseline Noise Report identifies three main categories of potential impacts, construction, operational and decommissioning, with multiple specific noisegenerating activities in each phase. The Baseline Noise Report identifies at least two areas of “very high” noise sensitivity and several additional receptors within 1000m of potential well locations, indicating a meaningful risk of disturbance. Potential impacts include increased ambient noise levels from drilling, heavy equipment, traffic, compressors, pumps and plant operations, which may exceed rural rating levels and cause annoyance, sleep disturbance and community complaints. Construction noise may be audible up to about 2000m and could exceed acceptable levels at nearby receptors, while operational plant and wellhead equipment may elevate night-time noise above rural thresholds at the closest receptors. With regard to the assessment of the baseline noise environment, the following specific issues of concern must be evaluated: 76.1. What are the current ambient noise levels? 76.2. Has a baseline noise monitoring study been conducted? Without measured baseline levels, it is not possible to determine whether projected noise will exceed acceptable thresholds. The Baseline Noise Report itself acknowledges this uncertainty. It notes that “Without information about actual ambient sound levels ... there is a low confidence in this assessment”. 76.3. Are there seasonal variations affecting baseline noise levels? 76.4. What are the permissible day/night noise limits in the area? 76.5. Will exemptions or variances be required for the noisy activities related to the proposed activities? 76.6. Are cumulative impacts expected from industrial, mining or agricultural projects nearby? 76.7. Could low-frequency noise impact residents or communities even if dB limits are met? The Scoping Report indicates that seismic surveys may be conducted using methods such as Vibroseis, Accelerated Weight Drop (“AWD”) or Magnetotelluric surveys. Both Vibroseis and AWD generate repeated ground vibrations and audible noise over extended transects.⁷⁹ These impulsive and continuous low-frequency sounds can affect nearby communities, livestock and wildlife, especially where surveys occur close to residential or

concern identified will be considered for evaluation by the specialist. 78 – 78.3. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of concern identified will be considered for evaluation by the specialist. 79 – 79.6. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of concern identified will be considered for evaluation by the specialist. 80 – 80.6. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of concern identified will be considered for evaluation by the specialist. 81 – 81.6. A baseline Noise Impact Assessment was undertaken (Refer to Appendix F4 of the Scoping Report). A full Noise Impact Assessment inclusive of modelling will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of concern identified will be considered for evaluation by the specialist.

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sensitive areas. 76.8. What is the distance between additional noise-sensitive receptors? 76.9. Will predicted noise levels exceed applicable standards? The Baseline Noise Report indicates that construction noise levels could reach levels above rural rating limits at distances of up to 1000 metres. It states that "Equivalent nighttime noise levels of up to 49 dBA may be expected at 1000 meters".⁸⁰ The rural night-time rating level identified earlier in the Baseline Noise Report is 35 dBA. This means that projected noise could exceed acceptable rural limits by a substantial margin. 76.10. Where it is found that projected noise could exceed acceptable rural limits by a substantial margin, how often would such exceedance occur? 76.11. Where it is found that projected noise could exceed acceptable rural limits by a substantial margin, how long will such exceedance last? 76.12. Where it is found that projected noise could exceed acceptable rural limits by a substantial margin, how many receptors would be impacted? 76.13. The Baseline Noise Report confirms that a full environmental noise impact assessment must still be undertaken and that key data are not yet available and the current findings do not sufficiently quantify impacts or demonstrate compliance with applicable standards. How will the EAP comply with applicable standards? 76.14. How will the EAP determine that operational noise impacts will be acceptable? The Scoping Report acknowledges that operational noise from compressors, pumps and processing equipment may raise noise levels at nearby receptors and may exceed night-time rural limits. It states that "Night-time noises may exceed the rural rating level ... though the significance ... can only be determined during the EIA stage".⁸¹ This confirms that the current Baseline Noise Report does not determine whether operational noise impacts will be acceptable. It merely identifies the possibility of exceedances. 77. The Baseline Noise Report repeatedly acknowledges that actual ambient noise levels are unknown. It states that site visits and measurements will only occur during the future EIA phase. With regard to human health and social impacts connected to the noise levels of the proposed development, the following specific issues of concern must be evaluated: 77.1 Could noise cause sleep disturbance to residents and communities? 77.2 Could noise impact learning in schools? 77.3 Are there vulnerable groups, including the elderly, children, livestock farmers and rural communities that may be impacted by the noise? 77.4 Could noise impact livestock productivity? 77.5 Are there concerns about vibration impacts on renewable energy facilities and structures? 77.6 Is there community sensitivity due to past industrial activity? 78. With regard to the ecological and biodiversity impacts connected to the noise levels of the proposed development, the following specific issues of concern must be evaluated: 78.1 Could noise disturb wildlife breeding or feeding patterns? 78.2 Are there threatened species present? 78.3 Could ground vibration impact burrowing species? 79. The Baseline Noise Report states that mitigation will depend on future modelling and that measures will be proposed later. It does not provide any firm mitigation commitments at this stage. It states "Mitigation will depend on the noise levels calculated at the closest receptors".⁸² With regard to the measures to mitigate the adverse impacts of noise in relation to the proposed development, the following specific issues of concern must be evaluated: 79.1. Can equipment be acoustically insulated? 79.2.

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Can operations be limited to daytime hours? 79.3. Are noise barriers feasible? 79.4. Can setback distances be increased? 79.5. Is real-time noise monitoring planned? 79.6. What grievance mechanisms will be implemented? 80. With specific reference to monitoring of noise: 80.1. How will compliance with noise limits be verified? 80.2. What monitoring locations will be used? 80.3. Will independent noise audits be conducted? 80.4. What corrective actions will be taken if limits are exceeded? 80.5. Will the outcomes of noise monitoring be available to the public? 80.6. In the event that noise thresholds are exceeded, will there be an immediate notification procedure to sensitive receptors? 81. In terms of stakeholder engagement: 81.1. Have nearby communities been consulted about noise concerns? 81.2. What are community perceptions of risk? 81.3. Are traditional authorities involved? 81.4. Have farmers and landowners raised livestock concerns and, if so, what do these concerns consist of? 81.5. Rural communities often experience very low baseline noise, with even moderate industrial noise having a significant impact on these communities. How will this be addressed? 81.6 In the Free State region, quiet ambient conditions increase the perceived impact. Has this factor been incorporated from a noise impact assessment perspective?

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SOCIO-ECONOMIC IMPACTS 82. The identification, evaluation and assessment of socio-economic conditions and impacts of the proposed development is a critical undertaking by the EAP as early as the scoping phase. The following list of questions must be addressed by the EAP in this regard: 82.1. What is the baseline socio-economic conditions in the immediate and surrounding areas of the proposed development? 82.2. What are the current population demographics, with reference to age, income levels, skill levels and employment rates? 82.3. What is the past, present and predicted future predominant sources of livelihood in the immediate and surrounding areas? 82.4. What is the current unemployment rate in the affected municipalities? 82.5. What levels of poverty and inequality exist in the immediate and surrounding areas? 82.6. What social services are available in the immediate and surrounding areas, such as schools, clinics, housing, water and electricity, among others? 82.7. What traditional or informal economic activities are practiced in the immediate and surrounding areas? 83. At a minimum, the EAP must demonstrate: 83.1. A compelling, evidence-based public need. 83.2. The absence of reasonable, less harmful alternatives that will achieve the same if not better socio-economic advantages. 83.3. Compatibility with surrounding land uses. 83.4. Compliance with climate and sustainability commitments. 83.5. That benefits clearly outweigh the environmental and renewable energy opportunity costs. Employment and local economic development 84. With respect to employment and local economic development on

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82. Statement Noted. 82.1 – 82.7. Kindly refer to section 9 of the Scoping Report for the environmental attributes and baseline environment. 83 – 83.5. Kindly refer to section 6 of the Scoping Report for the needs and desirability assessment and section 7 for project alternative. 84 – 84.8. The Social and Labour Plan (SLP) commitments of the project will be detailed in the EIA Phase to address concerns / questions in this section. 85 – 85.5. A baseline Social Impact Assessment was undertaken (Refer to Appendix F8 of the Scoping Report). A full Social Impact Assessment will be undertaken in the EIA Phase as detailed in the Scoping Report. The issues of concern identified will be considered for evaluation by the specialist. The Social and Labour Plan (SLP) commitments of the project will be detailed in the EIA Phase. 86 – 86.6. We acknowledge your concerns of the perceived risk of undermining your clients land use. Motuoane is mindful of the overlapping right holders and approved renewable energy developments within the proposed Production Right application area. As stated in the Scoping Report, the Applicant respects the interests of all surrounding stakeholders and seeks to find a coexistence arrangement that would be beneficial to all parties involved. In compliance with the requirements of Appendix 2 of the EIA Regulations 2014 as amended, alternative assessment was undertaken and represented in Section 7 of the Scoping Report. The alternative identified will be assessed further both the EAP and specialists and presented in the EIA phase for public review and authority adjudication. 87 – 87.6. Health and safety risks are identified and assessed in section 10 of the the Scoping report.

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a local and regional level: 84 – 84.8. The Social and Labour Plan (SLP) commitments of the project will be detailed in the EIA Phase to address concerns / questions in this section. 84.1. How many temporary jobs will be created at a best and worst-case scenario perspective? 84.2. What percentage of jobs will be available to local residents? A commitment to providing local employment “where feasible” is insufficient. Clear, demonstrable, quantifiable commitments to the provision of local employment must be provided as a critical pre-requisite and as early as the scoping phase. 84.3. What skills are required for employment during the construction and operational phases of the proposed development, and are these skills available locally? 84.4. What percentage of employment opportunities will be absorbed by the Australian-owned Motuoane? 84.5. Will there be training or skills development programmes? If so, what will these programmes entail and what specific end-goals do these programmes seek to achieve beyond a general and unsubstantiated commitment to “upskilling”? 84.6. Precisely how will local businesses be included in procurement opportunities, and will these businesses benefit from preferential procurement opportunities? 84.7. Will the proposed development support local Small, Medium and Micro Enterprises and, if so, how and to what measurable degree? 84.8. What is the expected contribution of the proposed development to municipal revenue and taxes? Land use and livelihood impacts 85. Due to the high likelihood of impacts on landowners and differing land uses, answers to the following questions are critical: 85.1. Will land be acquired, leased or restricted? 85.2. Will agricultural activities be affected and, if so, in what ways? 85.3. Will renewable energy facilities be affected and, if so, in what ways? Alluding to the potential for co-existence where there is no tangible evidence that this is even possible in circumstances in which as-built renewable energy development already exist in the area is insufficient. 85.4. How will compensation be determined and administered in the event of conflicting land uses? 85.5. Could exploration and/or production activities disrupt grazing, farming and renewable energy development and, if so, how? Impact on renewable energy development in the area 86. In light of the existence of various renewable energy developments in the production area, as-built and approaching construction, the following questions and answers thereto are critical: 86.1. Define the precise parameters of the spatial conflict between the proposed gas activities and renewable energy developments in the production area. 86.2. How does the proposed gas activities risk renewable energy development’s status as preferred bidders under the Department of Electricity and Energy’s, the erstwhile DMRE, Renewable Energy Independent Power Producer Procurement Programme? 86.3. Does the proposed gas activities impact the long-term capital investment provided by the renewable energy developments which are dependent on landuse certainty, stable operating conditions and investor confidence? If so, in what ways is this impact mitigated and managed? 86.4. How does the proposed development impact renewable energy development financing arrangements, insurance risk profiles and long-term revenue projections? Are these impacts capable of mitigation and management? 86.5. What are the economic consequences of placing production wells through existing and planned renewable

The risks identified and concerns raised by I&APs will be assessed further by both the EAP and specialists and presented in the EIA phase for public review. Management measures will be proposed in the EMPr. 88.1 – 88.4. The possibility of an influx of workers from outside the local area is possible, as such, perceptions need to be managed very early on in the process. Locals will be prioritised for employment opportunities. Due to the nature and scale of the proposed development, it is unlikely that it would increase cost of living or housing prices in the area. The risk of social conflict and/or inequality will be assessed by the Social specialists. As stated above, locals will be prioritised for any opportunities presented by the project. The commitments of the SLP in this regard will be considered. 89. Statement noted. 89.1. Impacts on existing infrastructure has been identified and assessed in section 10 of the Scoping Report. 89.2. Kindly refer to section 4.1.6.2 of the Scoping Report. 89.3. The project is not expected to significantly increase the local population. 89.4. Kindly refer to Table 37 in section 10 of the Scoping Report impacts on existing infrastructure. 90.1 – 90.4. The principles enshrined in Section 2 of the NEMA are the overarching basis upon which the EIA Report and detailed specialist assessment will be undertaken. Furthermore, the basis on which the impacts were assessed are clearly articulated in Section 10 of the Scoping report. These principles will further be basis upon which the EIA report and detailed specialists studies are undertaken, which will provide the Competent Authority and other commenting Government authorities with the information necessary to make an informed decision. All pre-identified and registered I&APs were adequately informed of the proposed project and requested to provide comments/inputs on the project. All comments received were addressed and included in the Final Scoping Report.

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energy developments? 86.6. What is the comparison between the socio-economic contribution of renewable energy development and that of gas extraction activities, with a particular reference to job creation and local/regional community upliftment? Community health and safety 87. What are the main health and safety risks to the local population, no matter how remote these risks are perceived from the EAP and Motuoane’s perspective, and how will these risks be mitigated and managed? The following questions are particularly relevant in this regard: 87.1. Could air, water or soil pollution as a result of the proposed development affect community health and, if so, how? 87.2. What are the risks associated with noise, dust or vibration? 87.3. Will increased traffic pose safety risks and, if so, how? 87.4. Are there risks are accidents, spills or blowouts? 87.5. How will emergency response systems be managed, and how immediate will these responses be implemented in the event of emergency? 87.6. How will communicable diseases be managed, with reference to, for example, workforce influx and the issue of Foot-and-Mouth disease spread with the transport and delivery of project infrastructure and materials? Social cohesion 88. The proposed development will place social cohesion at risk in light of the fact that very few jobs will be available to local communities. In this context, the following questions are critical: 88.1. Is an influx of workers from outside the local area anticipated and, if so, how will this influx be managed in the context of a project that is likely to create minimal jobs for locals? 88.2. Could the proposed development increase cost of living or housing prices? 88.3. Are there risks of social conflict or inequality and, if so, how will these be mitigated and managed? 88.4. How will vulnerable groups, such as women, youth, elderly or disabled persons, be affected? Infrastructure and public services 89 The proposed development is an infrastructural development of some magnitude, with the potential to have a significant impact on existing and planned infrastructure and public services. In this regard, we require confirmation of the following: 89.1. Will roads, water supply and electricity infrastructure be affected and, if so, how? 89.2. Will the proposed development require upgrades to public infrastructure? 89.3. How will the added strain on healthcare and schooling be addressed? 89.4. Who will be responsible for infrastructure maintenance? Particularly in circumstances whereby the construction and operation of the proposed development will place an additional burden on infrastructure within the area. Environmental justice 90. In circumstances where negative project impacts will have a greater and disproportionate impact on poorer communities within the study area and surrounding, confirm the following: 90.1. Does the proposed development align with NEMA and the underpinning principles of environmental justice encapsulated in section 2 thereof? 90.2. Have affected communities been adequately informed and consulted? In what ways can the dissemination of information and consultation of these communities be improved in a heightened pursuit of environmental justice? 90.3. How will community and I&AP grievances be recorded and resolved? Will these grievances be made publicly available? 90.4. Are historically disadvantaged communities disproportionately affected? If so, in what way and how will these affected be mitigated and managed?

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Long-term cumulative impacts 91 From a socio-economic perspective and beyond an analysis of short-term impacts, cumulative and otherwise, the long-term, cumulative socio-economic impacts of the proposed development are critical to a scoping phases analysis. This includes an answer to the following: 91.1 What are the long-term economic sustainability prospects of the proposed development in best- and worst-case production scenarios? 91.2 Could the proposed development affect tourism, renewable energy develop and/or agriculture in the long-term? 91.3 What are the cumulative impacts of the proposed development when understood in the context of other regional projects undertaken (i.e. renewable energy development, projects in terms of the MPRDA and agricultural enterprises)? 91.4 What is the closure and rehabilitation plan? Climate and the Just Energy Transition 92 Strategic national considerations to be address in the EIA phase include: 92.1 How does the proposed development align with South Africa’s Just Energy Transition? Particularly in circumstances in which the proposed development is purported to be a bridge between coal-intensive energy dependence and a greater reliance on renewable energy provision, but in actual fact threatens the overall feasibility of at least 5 renewable energy developments in the study area. 92.2 What are the projected greenhouse gas implications? 92.3 Will gas development support national energy security, particularly in circumstances where the development threatens various renewable energy developments? 92.4 Could the proposed development create stranded assets in the future? Transparency and communication 93 In furtherance of transparency and communication, core tenets to the overall EIA regime, confirm the following: 93.1 Who are the key stakeholders with respect to the proposed development? This includes reference to municipalities, traditional leaders, non-governmental organisations, farmers, renewable energy developers and operators. 93.2 How will engagement be conducted, with reference to public meetings, surveys and focus groups? 93.3 Are all materials available in local languages? 93.4 How will I&AP feedback influence project design?	91 – 91.3. Assessment of cumulative impacts is a requirement under the NEMA EIA Regulations and forms part of EIMS’s Impact Assessment Methodology. Cumulative impacts will be assessed by all specialists including the Hydrogeology specialist and the EAP during the compilation of the detailed EIA reports. 91.4. Closure and rehabilitation plan will be drafted together with the EMPr. 92.1 – 92.3. According to the Integrated Resource Plan (IRP) published in October 2025, South Africa will need to significantly expand locally sourced natural gas to meet future energy demands, especially as coal is phased down and renewable integration accelerates. Natural gas is positioned as a transition fuel to complement renewables. Current imports from Mozambique’s Pande-Temane fields will be depleted by 2028, increasing the demand for locally sourced gas to reduce reliance on imports and ensure energy security. 92.4. To assessed in the EIA phase. 93. Statement noted. 93.1. This correct, all I&APs are considered project stakeholders 93.2 Engagements will be conducted in accordance with requirements of NEMA EIA Regulations. 93.3. As mentioned above, notification has been made in English, Afrikaans and Sesotho. As stated in the Scoping Report, the proposed project is located in Wards 1, 3, and 4 of the Matjhabeng Local Municipality and Ward 6 of the Masilonyana Local Municipality that both forms part of the Lejweleputswa District Municipality in the Free State Province (2016 municipal boundaries). The majority of people in the area under investigation have Sesotho as home language. Although IsiXhosa is widely spoken in the Lejweleputswa District Municipality, Sesotho remains the mostly commonly spoken language in the study area. Refer to section 9.4.2.3 of the Scoping Report and Section 5.2.4 of the associated Social Impact Specialist Report. 93.4. I&AP feedback is key to a successful EIA process and all feedback received will be considered and submitted to the authorities. I&AP feedback will be taken into consideration if project planning and implementation where relevant.		

Date	2026/03/16	Method	Email
Comment	Response		
Dear Sir/Madam Kind regards,	Please provide the appeal decision referred to in comment response No. 3.	Good day Celine, Please find attached the requested document. We hope everything is in order. For anything further, please do not hesitate to contact us.	

GP Kriel

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GP Kriel

Date 2026/01/05 Method Email

Comment

Good day, Please register me as an interested and affected party for this project. Kind regards,

Response

Good day, Please note that you have been added onto our database and an I&AP, you will be receiving all further communication regarding this proposed project going forward. For any further queries and concerns, please do not hesitate to contact us.

Abigail Forbes

Date 2025/11/20 Method Email

Comment

Good day, I trust you are well. Could I kindly request a KMZ file of the 1709 Motuoane Production Right area? Kind regards,

Response

Good day ***, Hope this message finds you well. Apologies for the delay. Attached is the KMZ file as requested. For any further queries and comments, please do not hesitate to contact us.

Thobatsi Thobatsi

Date 2026/01/18 Method Email

Comment

Good Day I hope this email finds you well. Can you please register me as an interested and affected party for the project that is planned between Ventersburg and Virginia in the Free State Province. Please also share any reports and information regarding the project. Kind Regards ,

Response

Good day ***, Thank you for your email. Please note that you have been registered as an Interested and Affected Party for this proposed project. You will receive all proposed project related communication from this point going forward. Please note that all project related documents published to this point are available on our website: 1709 Motuoane Production Right EIA – EIMS. For any further queries and/or concerns, please do not hesitate to contact us.