



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

NAME OF APPLICANT: Relta 17 (Pty) Ltd

REFERENCE NUMBER: NC30/5/1/1/2/10442 MP

ENVIRONMENTAL MANAGEMENT PLAN

**SUBMITTED
IN TERMS OF SECTION 39 AND OF REGULATION
52 OF THE MINERAL AND PETROLEUM
RESOURCES DEVELOPMENT ACT, 2002,
(ACT NO. 28 OF 2002) (the Act)**

STANDARD DIRECTIVE

Applicants for prospecting rights or mining permits, are herewith, in terms of the provisions of Section 29 (a) and in terms of section 39 (5) of the Mineral and Petroleum Resources Development Act, directed to submit an Environmental Management Plan strictly in accordance with the subject headings herein, and to compile the content according to all the sub items to the said subject headings referred to in the guideline published on the Departments website, within 60 days of notification by the Regional Manager of the acceptance of such application. This document comprises the standard format provided by the Department in terms of Regulation 52 (2), and the standard environmental management plan which was in use prior to the year 2011, will no longer be accepted.

IDENTIFICATION OF THE APPLICATION IN RESPECT OF WHICH THE ENVIRONMENTAL MANAGEMENT PLAN IS SUBMITTED.

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1 REGULATION 52 (2): Description of the environment likely to be affected by the proposed prospecting or mining operation

1.1 The environment on site relative to the environment in the surrounding area.

Status of the cultural environment that may be affected

The Namaqualand copper mines and their associated infrastructure and cultural landscape reflect the beginnings of the mining industry in South Africa in all the myriad ways in which that industry influenced and continues to influence society through the movement and housing of people, the development of transport and other infrastructure and industries and in the development of technological and scientific endeavour.

Any form of mining or prospecting will therefore be a continuation of the socio-cultural aspects of the area.

No cultural heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves, graves of victims of conflict, and cultural landscapes or viewsapes are present on the 1Ha mining area.

Status of any heritage environment that may be affected

Mining will be conducted on a shallow pegmatite outcrop and due to the unconsolidated nature of the rock no sites of archaeological interest can be present on the small 1Ha area and some parts of the area is already disturbed by previous mining. Previous mining was conducted by hand using picks and shovels to mine the exposed pegmatites to depth of not more than 2 meter. The same mining proses will be implemented with the difference that jackhammers and or explosives will be used instead of only manual labour and the possibility to unearth any fossils or artefacts is therefore zero and given the high cost of a visit to this site, no first phase paleontological assessment is deemed necessary. No other heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves of victims of conflict, and cultural landscapes or viewsapes are present on the mining area applied for (refer diagrams below).

Status of any current land uses and the socio-economic environment that may be directly affected

Approximately 90% of the region is used for livestock grazing and production, with the remainder comprising of agriculture and urban development. Urban development is not a major feature of the landscape, and is not expected to increase much in the coming years.

Mining will only be a temporary land use where after land use will revert back to the pre-mining land use grazing. Productivity of the land with regard to land use is very low and mining will have no impact on the productivity of the area.

Status of any infrastructure that may be affected

No infrastructure will be affected due to the remote locality of the operation. Existing roads and tracks will be used and in the case of new tracks be developed it will be addressed at final closure and rehabilitation.

Status of the biophysical environment that may be affected

Topography

The area is characterized by a series of mountain ranges which together make up the western escarpment. The topography ranges from gently undulating to steeply rolling, and large granitic boulders often dominate the landscape. The topography of the proposed mining area has been altered by previous mining activities with the presence of excavations.

Soil

The soils in a regional context are diverse with rock covering about 90% of the area. The soils are typically weakly structured with low organic content. These soils drain freely which results in a soil surface susceptible to erosion, especially wind erosion when the vegetation cover is sparse and gully erosion in areas where storm-water is allowed to concentrate. The soils in the area are generally not suitable for dry land crop production therefore the pre-mining land capacity is categorized as Class III grazing land. The productivity of the area is extremely low at 25Ha/SSU.

Natural vegetation / plant life

The mining area is situated within the Namaqualand Klipkoppe Shrubland vegetation unit. Typically Namaqualand Klipkoppe Shrubland occurs at elevations <600 – 1300m. A significant number (>15) of endemic species occur primarily or wholly within this vegetation type, but as noted, this may be partly a function of insufficient habitat or locality information, and also partly a function of the physical extent of the shrubland vegetation types, which cover very large areas in Namaqualand. In all situations the Shrubland vegetation occurs in rocky areas, with relatively shallow soils. Typical species in the Shrubland vegetation include *Rhus undulata* (taaibos), *Rhus horrida*, *Lebeckia sericea* (fluitjiesbos), *Didelta spinosa* (perdebos), *Pteronia incana* (asbos), *Pentzia incana* (ankerkaroo), *Euphorbia mauritanica* (melkbos), *Zygophyllum morgsana* (slaaibos), *Cotyledon cuneata* and *C. orbiculata* (plakkies), and *Ruschia* spp. *Ozoroa dispar* (resin tree) and *Aloe dichotoma* (kokerboom) are useful indicators of Klipkoppe Shrubland.

Animal Life

Endemism rates for invertebrates are high, and many unique and remarkable adaptive insects can be found in this region, including the scorpion – of which 22 are already known to be endemic to the NDM. Likewise, there is an abundance of reptiles and snakes in the region, many of which are near endemic (including the Namaqua dwarf adder, which is the smallest of Africa's adders, measuring between 20-25 cm), as well as a few unique frogs such as the endemic rain frog, the marbled rubber frog and the paradise toad.

Larger herbivores are absent due to the altered habitat and competitive land uses.

Surface Water

The mining area is adjacent to an intermittent stream that forms the top catchment area of the Kosies Rivier but no drainage channels occur within the mining area and there is no dendritic system which could be disturbed. Surface water only accumulates in the drainage channels after exceptional good rains and drains into the Orange River at Vioolsdrift. Given the variability of semi-arid rainfall, the calculation of the mean annual runoff (MAR) would be of no use. The MAR is in any event very low given the low rainfall less than 60 mm per year occurring mainly in the winter months, high evaporation rates, and shallow grade of the slope toward the drainage channels and the permeability of the soils

The surface water quality (when available) is suitable for animal consumption but not for potable water. Potable water is obtained from the Orange River water supply scheme a pipeline of the local authority running from the Orange River at Henkries and supplying potable water to the rural regions. No natural wetlands exist in the area.

Groundwater

The majority of municipalities and towns rely on groundwater or local water resources to supply the rural areas with drinking water. Thus, the higher rainfall areas are key recharge zones for these groundwater resources. Consequently, land use management of these catchment areas is critical for the maintenance of the quality

and quantity of water sourced from each area. For example, water courses and wetlands that have been cleared for agricultural purposes, or overgrazed, will not only cause soil erosion, but most importantly cause increased water runoff, thus reducing the amount of water that feeds back into the water table for consumption.

The average water level measured at 'rest' in the region is about 80m depending on the season. No water will however be used during the mining operation.

Air Quality

The air background quality in Namaqualand is very good due to low industrial activity and very low population density. Given the surrounding extent of semi-desert, dust generation is high under windy conditions (dust storm) however under normal conditions no extreme dust conditions are noted on site.

Noise

Background noise level is the same as for other small settlements and at present such noise levels are low, below 55dBA.

1.2 The specific environmental features on the site applied for which may require protection, remediation, management or avoidance.

Description of potential impacts identified on the cultural heritage environment

Mining will be conducted on a shallow pegmatite outcrop and due to the unconsolidated nature of the rock no sites of archaeological interest can be present on the small 1Ha area and some parts of the area is already disturbed by previous mining. Previous mining was conducted by hand using picks and shovels to mine the exposed pegmatites to depths of not more than 2 meter. The same mining proses will be implemented with the difference that jackhammers and or explosives will be used instead of only manual labour and the possibility to unearth any fossils or artefacts is therefore zero and given the high cost of a visit to this site, no first phase paleontological assessment is deemed necessary. No other heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves of victims of conflict, and cultural landscapes or viewsapes are present on the mining area applied for.

Description of potential impacts identified on the socio- economic conditions

The only other land use in the area is mining and small stock grazing and due to the small extends of the mining area there will be no impact on productivity. The area is also disturbed by historic mining and the applicant is willing to take responsibility for the rehabilitation of all mining disturbances on the area applied for. Mining operations will however have a positive impact on the socio-economic environment in the form of skills development and job creation.

Description of potential impacts identified on: employment opportunities, community health, and community proximity

The only impact is a positive one on employment opportunities in sparsely populated areas with little or no job opportunities.

Description of potential impacts identified on the biophysical environment

This impact assessment only deals with significant impacts and the implementation of the mitigating and management measures prescribed in the EMP will address all the existing impacts and after implementation of the mitigating measures most impacts can be classified as insignificant especially when looking at the current state of the environment

Geology

Significance/Magnitude	Duration	Probability	Timing
Medium	Permanent	Certain	Activity

Due to the removal of all material from the pegmatite outcrop up to a maximum depth of 2 meter small excavations will be created in the form of incline cuttings. Waste rock will be dump on the downhill side of the excavations to follow the natural contour and blend in with the natural topography. Where possible overburden will be backfilled into the excavations in a cut and fill method in the same sequence that it was removed therefore mixing of the geological sequence of sediment will not occur.

Topography

Significance/Magnitude	Duration	Probability	Timing
High	Long term	Certain	Activity

Due to the removal of all material from the pegmatite outcrop up to a maximum depth of 2 meter small excavations will be created in the form of incline cuttings. Waste rock will be dump on the downhill side of the excavations to follow the natural contour and blend in with the natural topography. Where possible overburden will be backfilled into the excavations in a cut and fill method. Any high wall remaining after mining will have an insignificant impact on the visual aspect of the topography due to the undulating nature of the topography and similar natural high walls in the area.

Soils

Significance/Magnitude	Duration	Probability	Timing
Medium	Permanent	Certain	Activity

Very little topsoil is available on the pegmatite outcrops to be mined. The excavations require available topsoil or weathered rock be removed and stockpiled. Such topsoil will be replaced over the affected area once backfilled with overburden. All topsoil must be removed ahead of any development or disturbance of natural veld (this include stockpile areas). This topsoil must be stockpiled in berms which never exceed 2m in height to be placed on the high side (if applicable) of the development. This will, in the unlikely event of sheet flow from rainfall, act as storm water cut-off ridges. The topsoil thus retained will be used in the rehabilitation of the site as growth medium to be spread over areas ready for final rehabilitation.

Ground water

Significance/Magnitude	Duration	Probability	Timing
Low	Point	Unlikely	Activity

Due to the shallow nature of operations the impact on the groundwater is considered insignificant. The absence of a waste handling program can however have a significant impact through oil and fuel spills and soil contamination. No water will be used during the mining operation as no processing will take place.

Visual aspects

Significance/Magnitude	Duration	Probability	Timing
Medium	Long term	Certain	Activity

Due to the change in topography there is an insignificant impact on the aesthetic value of the area. This impact can be increased with the absence of an adequate waste management system. The mining site is not readily visible from any main through fare. Topsoil will be neatly stockpiled in a convenient location close to the excavation. Exposed high walls of incline cuttings needs to be blasted at final closure and needs to be treated with ferric-oxide to blend in with the colour of the surrounding rock if necessary. The visual impact of the operation will therefore be minimal.

1.3 Map showing the spatial locality of all environmental, cultural/heritage and current land use features identified on site.
Diagram 1 Locality plan contemplated in regulation 2(2) read with regulation 2(3) of the MPRDA (Act No. 30 of 2002)

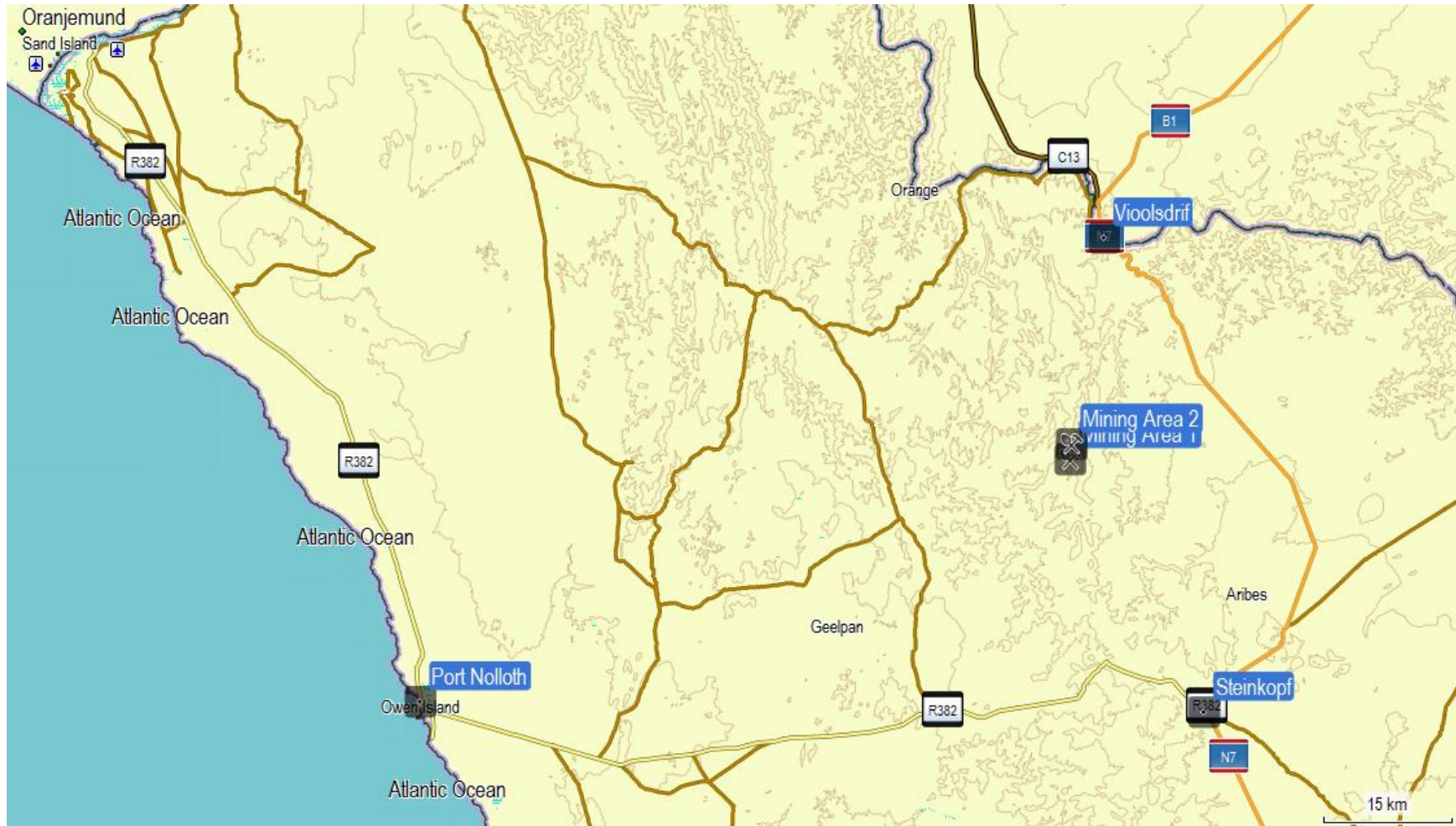


Diagram 2 Layout plan contemplated in regulation 2(2) read with regulation 2(3) of the MPRDA (Act No. 30 of 2002)

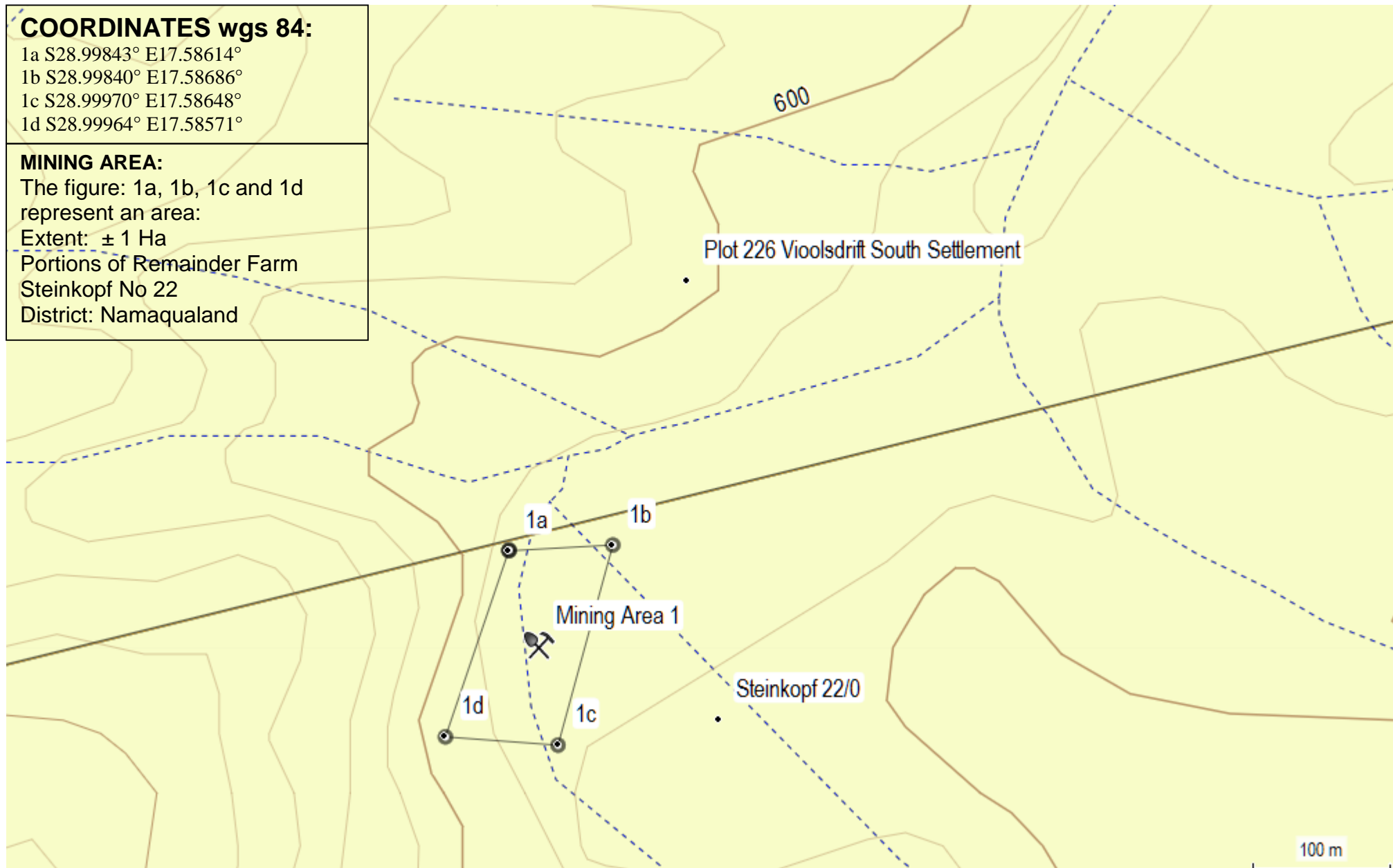


Diagram 3 Landscape of surrounding area



- 1.4 Confirmation that the description of the environment has been compiled with the participation of the community, the landowner and interested and affected parties,

Local authority as representative of community and landowner.

Department Land Affairs as custodian of all state and communal land.

All other interested parties by means of an advertisement in the local press.

All comments received were addressed in this EMPR.

2 REGULATION 52 (2) (b): Assessment of the potential impacts of the proposed prospecting or mining operation on the environment, socio-economic conditions and cultural heritage.

2.1 Description of the proposed mining operation.

2.1.1 Plan of the main activities with dimensions

The plan submitted under paragraph 1.3 show the main land uses on the proposed mining area and as can be seen the area is zoned as agricultural or unspecified land use. With regard to the proposed mining activities no additional infrastructure including roads will be constructed that needs to be indicated on the plan.

Mining operations will be very small and will be run from the nearby Ikosis Feldspar Mine.

The plans as contemplated in regulation 2.2, of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) will be updated on an annual basis with regard to the actual progress of the establishment of surface infrastructure, mining operations and rehabilitation together with an Performance assessment report as contemplated in regulation 55(1) (c) on the implementation of the Environmental Management Plan.

2.1.2 Description of construction, operational, and decommissioning phases

Construction phase

No infrastructure or roads will be constructed due to the small scale of mining. Infrastructure at the operations of the Ikosis Feldspar mine will be used and the infrastructure is covered by the EMP of the specific operation together with financial provision for decommissioning and closure.

Operational phase

Pegmatite's like Lepidolite, Beryl and Scheelite occur in small quartzite outcrops close to the surface and are normally mined as a manual operation. Excavations are normally not deeper than 2 meter with an average footprint of less than .25Ha. In exceptional cases larger ore bodies or clusters of smaller ore bodies do occur that will be mined in the form of an incline cutting. The incline cutting will be developed making use of jack hammers and in some cases by using explosives. The material will then be removed to a sorting/dumping area where hand sorting will take place. Ore will be bagged in 1 ton bags and removed off site for processing. Waste rock will be profiled on a single waste dump that will follow the contour of the outcrop to blend in with the natural topography. Where possible waste will immediately be backfilled into the excavation as part of a cut and fill operation.

The areas allocated for mining would first be stripped of all available topsoil. This topsoil would be stockpiled separately for later use when the cutting is rehabilitated.

The estimated footprint of all excavations will be less than 1Ha.

Decommissioning phase

Regulations 56 to 62 outline the entire process of mine closure, both as a guide to the process to be followed for mine closure, and also to address the legal responsibility with regard to the proper closure of operations. In terms of Section 37 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002), the holder of a right is liable for any and all environmental damage or degradation emanating from his operation, until a closure certificate is issued in terms of Section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act 28 of 2002).

"An application for a closure certificate must be accompanied by an environmental risk report which must include-

- (a) the undertaking of a screening level environmental risk assessment where-
- (b) the undertaking of a second level risk assessment on issues classified as
- (c) assessing whether issues classified as posing potential significant risks are acceptable without further mitigation;
- (d) issues classified as uncertain risks be re-evaluated and re-classified as either posing potential significant risks or insignificant risks;
- (e) documenting the status of insignificant risks and agree with interested and affected persons;
- (f) identifying alternative risk prevention or management strategies for potential significant risks which have been identified, quantified and qualified in the second level risk assessment;
- (g) agreeing on management measures to be implemented for the potential significant risks which must include-

2.1.3 Listed activities (in terms of the NEMA EIA regulations)

None of the activities listed above is a listed activity in terms of the Environmental Impact Assessment Regulations published in terms of Chapter 5 the National Environmental Management Act (Act No. 107 of 1998).

2.2 Identification of potential impacts

2.2.1 Potential impacts per activity and listed activities

The potential impacts are listed in paragraph 1.2 above and the assessment of these impacts is provided for in paragraph 3 below.

2.2.2 Potential cumulative impacts

Fortuitously, this area is duplicated by large tracts of land on all sides which offer the same habitat to fauna and flora. The only identified land use is small stock grazing and due to the temporarily nature of change in land use and small scale of the operation prospecting will not have any impact and the land will revert back to its former use grazing with no impact on production.

2.2.3 Potential impact on heritage resources

Mining will be conducted on a shallow pegmatite outcrop and due to the consolidated solid nature of the rock no sites of archaeological interest is present on the small 1Ha area and some parts of the area is already disturbed by previous mining. Previous mining was conducted by hand using picks and shovels to mine the exposed pegmatites to depths of not more than 2 meter. The same mining proses will be implemented with the difference that jackhammers and or explosives will be used instead of only manual labour and the possibility to unearth any fossils or artefacts is

therefore zero and given the high cost of a visit to this site, no first phase paleontological assessment is deemed necessary. No other heritage resources such as built structures over 60 years old, sites of cultural significance associated with oral histories, burial grounds and graves of victims of conflict, and cultural landscapes or views are present on the mining area applied for. Should any fossils be discovered or unearthed in the process of mining, the mining permit holder will contact a South African Museum or University which employs palaeontologists so that the necessary paleontological salvage operations can take place.

2.2.4 Potential impacts on communities, individuals or competing land uses in close proximity

The only other land use in the area is small stock grazing and due to the small extent of the mining operation there will be no impact on productivity.

Mining operations will however have a positive impact on the socio-economic environment in the form of skills development and job creation.

The area is farmland that is not close to any settlement therefore no land development projects are in progress.

2.2.5 Confirmation that the list of potential impacts has been compiled with the participation of the landowner and interested and affected parties

No proposals were received during the consultation process.

2.2.6 Confirmation of specialist report appended.

No specialist reports are deemed necessary as no sensitive areas are included in the proposed area and due to the small extent of the proposed mining area.

3 REGULATION 52 (2) (c): Summary of the assessment of the significance of the potential impacts and the proposed mitigation measures to minimise adverse impacts.

3.1 Assessment of the significance of the potential impacts

3.1.1 Criteria of assigning significance to potential impacts

All surface disturbances are rated high

Dust is rated low if only minimal dust is expected to accumulate over the prospecting area, medium if it is expected to require dust suppression such as watering, and high if there is a risk that it will migrate beyond the prospecting area.

Noise is rated low if no machinery is to be used, medium if machinery is to be used, and high if there is a potential for complaints from public and neighbours.

All drainage is rated high

All blasting is rated high

All dust and noise from loading, hauling and transport is rated high

Drainage from ablution facilities are rated high.

3.1.2 Potential impact of each main activity in each phase, and corresponding significance assessment

Construction phase

No construction activities therefore no potential impact.

No infrastructure or roads will be constructed due to the small scale of operations as described in the operational phase below. No processing will take place that need infrastructure to be constructed.

Operational phase

This impact assessment only deals with significant impacts and as the total footprint of mining operations will be very small (1 ha) the overall impact on the biophysical environment will be insignificant. Mining will also take place in an area that has been disturbed by historic mining activities and the implementation of the mitigating and management measures prescribed in the EMP will address all impacts and after implementation of the mitigating measures most impacts can be regarded as insignificant especially when looking at the current state of the environment

Possible risk factor	Qualitative impact level	If Insignificant, Why?
<i>Geology:</i>	Insignificant	Due to the removal of all material from the pegmatite outcrop up to a maximum depth of 2 meter small excavations will be created in the form of incline cuttings. Waste rock will be dump on the downhill side of the excavations to follow the natural contour and blend in with the natural topography. Where possible overburden will be backfilled into the excavations in a cut and fill method in the same sequence that it was removed therefore mixing of the geological sequence of sediment will not occur.
<i>Topography (Safety):</i>	Potential significant impact	Will require mitigation refer paragraph 3.2
Land Capability:	Insignificant	In the overall scheme of the surrounding landscape, the mining footprint can be considered minor and the remaining impact in this regard is insignificant.
<i>Soil:</i>	Insignificant	Very little topsoil is available on the pegmatite outcrops to be mined. The excavations require available topsoil or weathered rock be removed and stockpiled. Such topsoil will be replaced over the affected area once backfilled with overburden. All topsoil must be removed ahead of any development or disturbance of natural veld (this include stockpile areas). This topsoil must be stockpiled in berms which never exceed 2m in height to be placed on the high side (if applicable) of the development. This will, in the unlikely event of sheet flow from rainfall, act as storm water cut-off ridges. The topsoil thus retained will be used in the rehabilitation of the site as growth medium to be spread over areas ready for final rehabilitation. Any oil or fuel leaks caused must be removed with the saturated soil and placed in bags or drums for disposal at a suitable site as directed.
<i>Vegetation:</i>	Insignificant	As far as possible, existing roads would be used to access the mining area. As described above the area to be disturbed by mining is small, and the veldt regenerates well if topsoil is placed over areas where development has taken place. The effect on plant life would therefore be low and transient.
<i>Fauna.</i>	Insignificant	Minimal risk given the low density of fauna and the fact that the habitat is well represented in the adjacent area for dispersal.

<i>Surface water.</i>	Insignificant	No surface water present on the site. The hydrological integrity of drainage channels will not be altered by attenuating or diverting any of the natural flow.
<i>Groundwater.</i>	Insignificant	Due to the shallow nature of operations the impact on the groundwater is considered insignificant. The absence of a waste handling program can however have a significant impact through oil and fuel spills and soil contamination. No water will be used during the mining operation as no processing will take place.
<i>Air Quality:</i>	Insignificant	Isolation of site and small scale of operation precludes any impact in this regard No FRD will be created on site Stockpiling, loading and hauling will also be minimal. While existing dust generation has no noteworthy environmental impact on surround areas, dust should be controlled in the interest of improved worker health and safety. In this instance periodic wetting of the manoeuvring areas or even an annual application of a dust palliative can be considered. (No used oil or diesel is to be sprayed on the roadway for dust suppression).
<i>Noise</i>	None	The noise of the equipment and compressors is within the norm and activities will only take place during normal working hours. The noise generated is considered minimal due to the short time frame, the small scale of the operations and the isolation of the site. Despite noise having no impact on other uses / public given the isolation of the site, continue to pursue methods of mining which reduce noise in the interest of worker health and safety.
<i>Visual Impact:</i>	Potential significant impact	Will require mitigation refer paragraph 3.2
<i>Regional socio-economic structure</i>	Positive Impact	As far as possible, local labour will be used by the applicants. Stimulation of the supporting industries will naturally occur as many supplies will be obtained from the surrounding towns.

Decommissioning phase

Successful implementation of the Environmental Management Program during the life of the mine will cover all the significant aspects affecting the environment.

3.1.3 Assessment of potential cumulative impacts.

The only cumulative impact that will remain after implementation of the mitigating measures will be the visual impact.

3.2 Proposed mitigation measures to minimise adverse impacts.

3.2.1 List of actions, activities, or processes that have sufficiently significant impacts to require mitigation.

Waste management will be the major activity that has sufficiently significant impacts to require mitigation.

Mining will also have a significant impact on the topography and visual aspect of the generally flat topography. Due to the creation of excavations.

3.2.2 Concomitant list of appropriate technical or management options

3.2.2.1 General requirements

Mapping and setting out

A copy of the layout plan as provided for in Regulation 2.2 must be available at the mining area for scrutiny when required.

The plan must be updated on a regular basis with regard to the actual progress of the establishment of surface infrastructure, mining operations and rehabilitation (a copy of the updated plan shall be forwarded to the Regional Manager on a regular basis).

A final layout plan must be submitted at closure of the operation or when operations have ceased.

Demarcating of mining area

The mining area must be clearly demarcated by means of beacons at its corners, and along its boundaries if there is no visibility between the corner beacons.

Restrictions on mining

No owner or manager shall carry on any mining operations under or within a horizontal distance of a 100 meters from buildings, roads, or any structure whatever, or under or within a horizontal distance of 100 meters from any surface which it may be necessary to protect, without first having given notice in writing to the Principle Inspector of Mines of his intention to do so and obtain his permission therefore.

No mine waste will be allowed to be deposited in natural drainage lines or erosion gullies without the necessary authorization from DWAF and a written permission from the DMD. Mining must be conducted in such a manner as to ensure that natural drainage lines are not destabilized and that surface and ground water quality is not impaired.

Responsibility

The environment affected by the mining operations shall be rehabilitated by the holder, as far as is practicable, to its natural state or to a predetermined and agreed to standard or land use which conforms with the concept of sustainable development. The affected environment shall be maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof. It is the responsibility of the holder of the mining permit to ensure that the manager on the site and the employees are capable of complying with all the statutory requirements which must be met in order to mine, which includes the implementation of this EMP, the rehabilitation plan and the environmental awareness plan.

Pollution Prevention Measures

- Domestic Waste Management Programmes

The owner will instruct the employees in the need for procedure/tasks as well as the actual handling of domestic waste, relating to domestic waste management.

Domestic waste (lunch wrappers, containers, food tins, bottles) of daily workers as well as the domestic waste from the mining logistics will be provided for and handled as follows:

- Provide waste collection drums at strategic points.
- Demarcate an area for and constructed as "temporary waste storage area" for temporary collection and storage of the drums, prior to delivery to municipal disposal site for disposal. (On-site dumping/burial is not allowed without registration/licensing of such a site with the Department of Water Affairs and Forestry in terms of the Environment Conservation Act).
- Instruct staff on the distinction between domestic refuse and industrial waste.

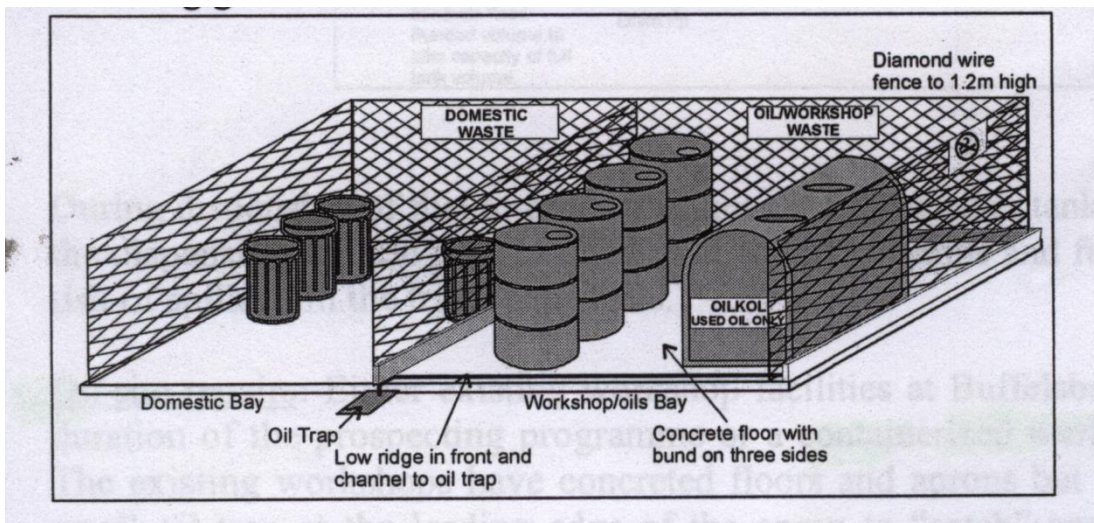
- Industrial Waste Management

Identify and demarcate (by fences) the following sites:

- A salvage yard for temporary storage of scrap steel and equipment prior to sale or removal as scrap. Arrange regular sale and collection of scrap from the site.
- A used oil collection and temporary storage area
- Temporary storage area for all used lubrication products and other hazardous chemicals (also refer Figure 1 below)

No engines or other equipment parts are to be stored in the scrap yard without either having had the oil drained or suitable measures have been taken to prevent leaking of oil.

Figure 1: Proposed layout of temporary waste storage area



- Diesel and Lubricant Handling Programme:

Refuelling:

Refuelling either of equipment or of the mobile trailer bowser must make use of a drip tray or PVC lining.

Any oil spills is to be treated with Spillsorb or equivalent as per the product instructions.

Staff will require instruction in the identification of oil and diesel leaks, the operation of the oil trap (including the disposal of trapped oil) and use of Spillsorb (or equivalent) products. Training of employees needs to take place as part of the core work skills plan.

On-site repairs:

Only minor repairs will be done on site. A drip tray or PVC facility needs to be used when servicing equipment on site to prevent any oil spills. All moving equipment needs to be equipped with permanent drip trays to prevent oil spills. All major repairs will take place at the workshop of the Kosis Mine. Waste oils from servicing of vehicles will be disposed of in the waste oil collection facility.

Contaminated spares, oil filters, gaskets, etc. will be collected in a separate drum at the designated storage facility for disposal at a suitable site off-site. Staff will require instruction in the:

- deleterious effects of oil /fuel on the environment
- identification and reporting of oil leaks
- location and method of the storage of contaminated spares and oil
- use of Spillsorb (or equivalent) products

Collection of contaminated spares and waste oils:

Contaminated spares, oil filters, gaskets, etc. will be collected in a separate drum at the designated storage facility for disposal at a suitable site off-site. Waste oils from servicing of vehicles will be disposed of in the waste oil collection facility.

Staff will require instruction in:

- deleterious effects of oil / fuel on the environment
- location and method of the storage of contaminated spares

Off-site disposal by a recycling company:

All waste oils must be collected in the facility for collection by a waste oil recycling company. Instruct the staff in the reasons for good fuel management and the alternative consequences. Identify area for citing of diesel bulk tank to remove fuel from delivery tanker truck - provide tank with bund wall and apron and construct used oil/lubricant collect/temporary storage point. Instruct staff in use of oil decontaminant procedure including:

- removal of contaminated soil in drums/bags to suitably licensed disposal dump,
- treatment of any residual contamination in situ with Spillsorb or similar decontaminant

Occupational Health Awareness Programme:

This will form part of the company's Hazard Identification and Risk assessment and will be provided for in the code of practice (COP's)

3.2.2.2 Construction phase

No permanent infrastructure or roads will be constructed due to the small scale of operations. No processing will take place that need infrastructure to be constructed.

The construction phase relates to the construction of:

- Storage area in the form of mobile containers.
- Temporary storage area for domestic and industrial waste including facilities for oil and fuel waste handling.
- Scrap yard for temporary storage of scrap steel and equipment prior to sale.

The following is the mitigating and/or management measures for all the significant impact identified with regard to the construction phase according to the different environmental aspects.

Topography

The mine is responsible for the maintenance and upgrading of all services but it will still be needed by the landowner at final closure.

On completion of mining operations, the vehicle maintenance yard and secured storage's areas shall be cleared of any contaminated soil. The surface shall then be ripped or ploughed to a depth of at least 300 mm and the topsoil previously stored adjacent the site, shall be spread evenly to its original depth over the whole area.

Progressive maintenance and upgrading of all services will take place and in the case of temporary closure, sudden closure during the normal operation of the project or at final planned closure there must be no outstanding rehabilitation.

The access roads are dual use road and the mine is only responsible for the maintenance of the road.

Provision must be made for efficient storm water control to prevent erosion of steep slopes and roadways. Any access road or portions thereof, constructed by the holder and which will no longer be required by the landowner, shall be removed and rehabilitated. Any gate or fence erected by the holder which is not required by the landowner, shall be removed and the situation restored to the pre mining situation.

Natural vegetation /Plant life

As far as possible, existing roads would be used to access the mining area. The area to be disturbed is small and it is proposed to remove the 300mm topsoil with vegetation content to a berm. The berm is to be limited to 2m in height in order to retain a viable seed bank. In addition, by locating the berm uphill of the excavation, the berm will act as a storm water control ridge in the unlikely event of surface water sheet flow.

The following general aspects will be implemented to reduce any potential impact:

- Movement and stockpile areas will be clearly demarcated and any movement outside of these areas must not be allowed
- No ad hoc roads, dumping or topsoil borrowing
- The area to be disturbed must be kept to the minimum required and it is proposed to remove the 30cm topsoil with vegetation content to a berm.
- No wood collected in the surrounding area will be allowed and cooking equipment, gas and paraffin must be supplied to the workers on the site.
- Invader species will be handled in terms of CARA and NEMBA as part of the land owners alien invasive control program.

Visual aspects

Progressive maintenance and upgrading of all infrastructures will take place and in the case of temporary closure, sudden closure during the normal operation of the project or at final planned closure there must be no outstanding rehabilitation.

At final closure all equipment will be removed and after implementation of the mitigating measures described under the heading topography the visual impact of the mining operation will be minimal.

3.2.2.3 Operational phase

Pegmatite's like Lepidolite, Beryl and Scheelite occur in small quartzite outcrops close to the surface and are normally mined as a manual operation. In exceptional cases larger ore bodies or clusters of smaller ore bodies do occur that will be mined in the form of an incline cutting. The following is the mitigating and/or management measures for all the significant impact identified with regard to the construction phase according to the different environmental aspects.

Topography

Mining will have a significant impact on the visual aspect of the generally flat topography.

Pegmatite's like Lepidolite, Beryl and Scheelite occur in small quartzite outcrops close to the surface and are normally mined as a manual operation. Excavations are normally not deeper than 2 meter with an average footprint of less than .25Ha. In exceptional cases larger ore bodies or clusters of smaller ore bodies do occur that will be mined in the form of an incline cutting. The incline cutting will be developed making use of jack hammers and in some cases by using explosives. The material will then be removed to a sorting/dumping area where hand sorting will take place. Ore will be bagged in 1 ton bags and removed off site for processing. Waste ruck will be profiled on a single waste dump that will follow the contour of the outcrop to blend in with the natural topography. Where possible waste will immediately be backfilled into the excavation as part of a cut and fill operation.

The areas allocated for mining would first be stripped of all available topsoil. This topsoil would be stockpiled separately for later use when the cutting is rehabilitated.

The estimated footprint of all excavations will be less than 1Ha.

Visual aspects

Due to the change in topography there is a significant impact on visual aspects. This impact can be increased with the absence of an adequate waste management system. At final closure all equipment will be removed. The management and mitigating measures with regard to topography will also address the visual impact.

3.2.2.4 Decommissioning phase

Residual Impacts after Closure

It is envisaged that at the time of project mine closure the total area will be stable so long term stability is not an issue.

The potential for acid mine drainage or poor quality leachates emanating from the mine or residue deposits are minimal as the rocks affected by the mining activities are inert and will not be detrimental to any aquifer present.

Any sediment caught up in rain run-off water will be trapped in settling ponds constructed for this purpose and recycled. The mitigating measures as described will be sufficient to address all impacts and the only residual impact after closure will be on the visual aspect but it will be mitigated to the effect that the impact can be regarded as insignificant.

Aftercare

As the final phase in the project cycle, decommissioning may present positive environmental opportunities associated with the return of the land for alternative use and the cessation of impacts associated with operational activities. However, depending on the nature of the operational activity, the need to manage risks and potential residual impacts may remain well after operations have ceased. Examples of potential residual impacts and risks include contamination of soil and groundwater, stock that has been abandoned (e.g. oil drums, scrap equipment, old chemicals) and old (unserviceable) structures. The closure plan submitted as part of this EMPR provides specific guidance with respect to the management of the environmental risks associated with the decommissioning stage of a project.

Unauthorized entry will be taken very seriously during final closure and traffic onto the property will be kept to a minimum. Regular monitoring of the effectiveness of environmental management and mitigating measures implemented during the post mining decommissioning phase will continue until a closure certificate is issued.

3.2.3 Review the significance of the identified impacts

The mitigating measures as described will be sufficient to address all impacts and the only residual impact after closure will be on the visual aspect but it will be mitigated to the effect that the impact can be regarded as insignificant.

4 REGULATION 52 (2) (d): Financial provision.

4.1 Plans for quantum calculation purposes.

Refer diagram 1.

4.2 Alignment of rehabilitation with the closure objectives

Internationally, there seem to be three schools of thought:

- “What the affected community wants, the affected community gets” – that is, the key focus is on providing the end product requested by the affected communities, rather than focusing on the previous status quo of the receiving environment

- “Restoration of previous land use capability” – the original thought process in the South African context, because mining often occurs on land with high agricultural potential
- “No net loss of biodiversity” – the focal point in the ICMM/IUCN dialogue sponsored guidelines for mining and biodiversity, and of many mining corporate policies.

The thought process for the closure of this operation is based on the last two. The main closure objective therefore is to leave the site in as safe and self-sustaining a condition as possible and in a situation where no post-closure intervention is required. The aim is to ensure that the affected environment is maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof. The aesthetic value of the area will also be reinstated.

Successful implementation of the Environmental Management Program during the life of the operation will cover most of the significant aspects affecting the environment.

4.3 Quantum calculations

Section 41(3) requires the holder of a prospecting right to annually assess his or her environmental liability and increase his or her financial provision to the satisfaction of the Minister. The financial provision required to be submitted by the holder of a prospecting right (in terms of Regulation 53) to achieve the total quantum for rehabilitation and remediation of environmental impacts and associated damage as well as close-out.

Regulation 54 requires that the quantum of financial provision must be based on the requirements of the approved EMP and shall include a detailed itemisation of all actual costs required for;

- Pre-mature closure regarding:
 - the rehabilitation of the surface of the area;
 - the prevention and management of pollution of the atmosphere;
 - the prevention and management of pollution of water and the soil; and
 - the prevention of leakage of water and minerals between subsurface
- Formations and the surface.
- Decommissioning and final closure of the operation; and
- Post closure management of residual and latent environmental impacts.

The methodology for computing the quantum is based on the assumption that a third party will be employed by the DMR to undertake the necessary rehabilitation and remedial work, should the mining operation close prematurely. This assumption is in line with the adopted international approach.

Rehabilitation of infrastructure area

Successful implementation of the Environmental Management Program during the life of the mine will cover most of the significant aspects affecting the environment.

All waste in the temporary storage area for used lubrication products and other hazardous chemicals needs to be disposed of at a collection point in Springbok from where it will be collected by a waste recycling company. There will only be three month worth of waste products present at any time to be dealt with.

Equipment required:

1 X 1 ton pic up for transport of waste to Springbok	R	1 250.00
Manual labour - loading of waste and final clean-up 2 hour @ R500/hour	R	1 000.00
Sub Total Infrastructure	R	2 250.00

Rehabilitation of surface disturbance

Levelled and profiling	
1Ha @ R7 900.00/Ha	R 8 000.00
Infrastructures to be demolish, removed and rehabilitated	R 7 000.00
Lowbed from Springbok	R 4 750.00
Sub Total surface disturbance	R 19 750.00

Final rehabilitation

All equipment and other items used during the mining operation needs to be removed from the site. Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.

Equipment required:

1 X 20m ³ dumper truck for transport of scrap and equipment	R 5 000.00
Manual labour - Demolishing and loading of scrap final clean-up	
4 hour @ R500/hour	R 2 000.00

Scarifying of all internal access roads within this mining block also needs to take place. Provision of efficient storm water control to prevent erosion of steep slopes and roadways and elsewhere are required

Equipment required:

Manual labour - erosion control measures	
2 hour @ R500/hour	R 1 000.00

Sub Total Final Rehabilitation R 8 000.00

Total estimated cost for requirements to fully decommissioned the site

Rehabilitation of infrastructure areas	R 2 250.00
Rehabilitation surface disturbance	R 19 750.00
Final rehabilitation	R 8 000.00
Total	R 30 000.00

4.4 Undertaking to provide financial provision

Financial provision required under Regulation 54 for the amount of R 30 000.00 will be furnish to DME. The quantum will be updated again within a year or at a shorter interval if there is any deviation from the prospecting work program.

5 REGULATION 52 (2) (e): Planned monitoring and performance assessment of the environmental management plan.

5.1 List of identified impacts requiring monitoring programmes.

None of the impacts identified required specific monitoring programs but a second closure objective is to ensure that the rehabilitation and mitigating measures applied during operation prove successful. The only way to accomplish this is by regular monitoring. Monitoring on all the environmental issues as discussed in the EMPR will be carried out on a regular basis. This includes monitoring of waste washed in from outside, the re-vegetation process, erosion and the effect of windblown sand and/or dust. Any unforeseen impact or ineffective management measures that are identified during monitoring will be addressed as an addendum to the EMPR.

5.2 Functional requirements for monitoring programmes

Every aspect of the operation must be checked against the prescriptions given in this document and if find that certain aspects are not addressed or impacts on the

environment are not mitigated properly, the identified inadequacies will be rectified immediately.

Regular monitoring of all the environmental management measures and components shall be carried out to ensure that the provisions of this program are adhered to.

Layout plans will be updated on a regular basis and updated copies will be submitted on an annual basis to the Regional Manager. The plans will also be updated before commencing with drilling and the rehabilitation quantum will also be updated.

Reports confirming compliance with various points identified in this program will be submitted to the Regional Manager on an annual basis together with an update of the rehabilitation cost. Any emergency or unforeseen impact will be reported as soon as possible. An assessment of environmental impacts that were not properly addressed or were unknown when the program was compiled shall be carried out and added as a corrective action.

As the final phase in the project cycle, decommissioning may present positive environmental opportunities associated with the return of the land for alternative use and the cessation of impacts associated with operational activities. However, depending on the nature of the operational activity, the need to manage risks and potential residual impacts may remain well after operations have ceased. Examples of potential residual impacts and risks include contamination of soil and groundwater, stock that has been abandoned (e.g. oil drums, scrap equipment, old chemicals) and old (unserviceable) structures. The closure plan to be submitted at final closure will provide specific guidance with respect to the management of the environmental risks associated with the decommissioning stage of a project. Unauthorized entry will be taken very seriously during final closure and traffic onto the property will be kept to a minimum. Regular monitoring of the effectiveness of environmental management and mitigating measures implemented during the post mining decommissioning phase will continue until a closure certificate is awarded.

5.3 Roles and responsibilities for the execution of monitoring programmes

The project manager will be responsible for monitoring and Reports confirming compliance with various points identified in the environmental management program.

5.4 Committed time frames for monitoring and reporting

The project manager must on a bi-monthly basis, check every aspect of the operation against the prescriptions given in this document and, if find that certain aspects are not addressed or impacts on the environment are not mitigated properly, the project manager must rectify the identified inadequacies immediately.

6 REGULATION 52 (2) (f): Closure and environmental objectives.

6.1 Rehabilitation plan

The rehabilitation or closure programs consist of two distinct sequential phases, planning and implementation. The objective is to ensure that there is clear accountability and adequate resources for the implementation of the rehabilitation and closure plan. The following considerations have been taken into account in the management and implementation of the rehabilitation and closure plan:

- accountability for plan implementation
- the resources needed to assure compliance with the plan (paragraph 4.3)

Progressive rehabilitation is good practice and has advantages for both the company and the community. From the perspective of the company it reduces its overall financial exposure and may reduce the amount of the bond.

From the perspective of the community progressive rehabilitation provides confidence in the rehabilitation process as well as reducing the scale of the mining site. Rehabilitation has now become one of the most important considerations when designing and operating a mine. Not only the visual impact of overburden and tailings dumps is considered, but also excavations and their visual impact and the change in land use are considered. In order to minimize the impact on the environment rehabilitation will take place on a continuous basis together with operations.

Rehabilitation of infrastructure area

When the mining area is fully developed within the first six month an infrastructure area will be developed with the following infrastructure:

- Standard ablution facilities for personnel as part of the temporary field office and maintenance yard in the form of chemical toilets
- A salvage yard for temporary storage of scrap steel and equipment prior to sale or removal as scrap
- Temporary storage area for all used lubrication products and other hazardous chemicals in the form of mobile containers
- A bunded parking area for the mobile fuel tanker with apron

Progressive maintenance will take place so that in the case of temporary closure, sudden closure during the normal operation of the project or at final planned closure there will be no outstanding rehabilitation.

Unwanted steel, sheet metal and equipment in the salvage yard will be sold or disposed of as scrap metal. This will be done at least every three months so that in the case of temporary closure, sudden closure during the normal operation of the project or at final planned closure there will only be three month worth of scrap present to be dealt with. Financial provision is made in section 4.3 to deal with this small volume of scrap if any.

All waste in the temporary storage area for used lubrication products and other hazardous chemicals will be disposed of at a collection point in Springbok from where it will be collected by a waste recycling company. This will be done at least every three months so that in the case of temporary closure, sudden closure during the normal operation of the project or at final planned closure there will only be three month worth of waste products to be dealt with. Financial provision is made in section 4.3 to deal with this small volume of hazardous waste if any.

A service apron must be provided at the fuel tank and refuelling of equipment from the tank or refuelling of the tank must take place on this apron.

Any oil spills on the concreted floors is to be treated with Spillsorb or equivalent as per the product instructions.

Staff will require instruction in the identification of oil and diesel leaks, the operation of the oil trap (including the disposal of trapped oil) and use of Spillsorb (or equivalent) products.

Only minor repairs will be done on site all major repairs must be done off site in Steinkopf or Springbok. Equipment service bay for routine maintenance and servicing of equipment must be equipped with a concrete floor and oil trap. Contaminated spares, oil filters, gaskets, etc. will be collected in a separate drum at the designated storage facility for disposal at a suitable site off-site.

Accidental oil spills needs to be cleaned up. The contaminated soil must be collected in drums/bags and removed to a suitably licensed disposal dump.

Treatment of any residual contamination in situ with Spillsorb or similar decontaminant must also take place. Staff will require instruction in the deleterious effects of oil /fuel

on the environment, the identification and reporting of oil leaks, the operation of the oil trap (including the disposal of trapped oil), location and method of the storage of contaminated spares and oil and the use of Spillsorb (or equivalent) products

When the mining area is fully developed within the first year services provided will include the following:

- Potable water supply from bore hole
- Domestic waste disposal system

The access road is a dual use road and the mine is only responsible for the maintenance of the road. Provision must also be made for efficient storm water control to prevent erosion of steep slopes and roadways.

Potable water is carted in and is obtained from a borehole provided for by the landowner.

Domestic waste from the daily workers needs to be sorted and all non-biodegradable waste needs to be stored in separate drums provided for and disposed of at the temporary storage area before disposal at the municipal dumping site in Springbok as part of the waste management program.

Progressive maintenance and upgrading of all services will take place and in the case of temporary closure, sudden closure during the normal operation of the project or at final planned closure there will be no outstanding rehabilitation.

Residue deposits and stabilization of the open cast pit

Discussed as part of rehabilitation of surface disturbance below.

Sealing of underground workings

Not applicable as there are no underground workings.

Stabilization of the open cast -workings

Discussed as part of rehabilitation of surface disturbance below.

Rehabilitation of surface disturbance

The total area covered by the mining operation is about 1 Ha including the waste dumps. The material from the excavations will be removed to a sorting/dumping area where hand sorting will take place. Ore will be bagged in 1 ton bags and removed off site for processing. Waste rock will be profiled on a single waste dump that will follow the contour of the outcrop to blend in with the natural topography. Where possible waste will immediately be backfilled into the excavation as part of a cut and fill operation.

The areas allocated for mining would first be stripped of all available topsoil. This topsoil would be stockpiled separately for later use when the cutting is rehabilitated.

The following rehabilitation will be addressed at final closure and financial provision is made in section 4.3 to deal with this rehabilitation:

- Profiling of waste dumps
- Excavations needs to be backfilled with left over stockpiles and waste dumps and excavations needs to be profiled and covered with available topsoil.
- All bags in the stockpile area needs to be removed and the area ripped and profiled with erosion control measures.

The goal of rehabilitation is to leave the area even and excavations to form an even depression to blend in with the natural topography.

Final rehabilitation

Successful implementation of the Environmental Management Program during the life of the mine will cover most of the significant aspects affecting the environment.

Those aspects that will require some attention during the final decommissioning phase are listed below:

- Scarifying of all compacted areas due to hauling.
- All internal roads need to be ripped except for the ones still needed by the landowner; this also includes repairs to all fences and gates.
- Provision of efficient storm water control to prevent erosion of steep slopes and roadways and elsewhere are required
- All equipment and other items used during the mining operation needs to be removed from the site.
- Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.
- Financial provision is made in section 4.3 to deal with these mitigating measures in case of temporary closure or sudden closure during the normal operation of the project or at final planned closure.

Timeframes to fully decommission the site

Successful implementation of the Environmental Management Program during the life of the mine will cover most of the significant aspects affecting the environment. The rehabilitation of the inherited liabilities will be addressed together with production. Final closure will be completed within six months after lapsing of the right in terms of the MPRDA. And after care will continue until a closure certificate has been issued.

6.2 Closure objectives and their extent of alignment to the pre-mining environment
Internationally, there seem to be three schools of thought:

- “What the affected community wants, the affected community gets” – that is, the key focus is on providing the end product requested by the affected communities, rather than focusing on the previous status quo of the receiving environment
- “Restoration of previous land use capability” – the original thought process in the South African context, because mining often occurs on land with high agricultural potential
- “No net loss of biodiversity” – the focal point in the ICMM/IUCN dialogue sponsored guidelines for mining and biodiversity, and of many mining corporate policies.

The thought process for the closure of this operation is based on the last two. The main closure objective therefore is to leave the site in as safe and self-sustaining a condition as possible and in a situation where no post-closure intervention is required. The aim is to ensure that the affected environment is maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof. The aesthetic value of the area will also be reinstated.

Successful implementation of the Environmental Management Program during the life of the operation will cover most of the significant aspects affecting the environment.

6.3 Confirmation of consultation

A copy of the scoping report that includes environmental objectives in relation to closure was made available to the landowner and all other interested parties for comment. All comments received were addressed in this EMPR.

7 REGULATION 52 (2) (g): Record of the public participation and the results thereof.

7.1 *Name the community or communities identified, or explain why no such community was identified.*

The community of Concordia as landowner.

7.2 *Specifically state whether or not the Community is also the landowner.*

The property is registered in the name of the community of Concordia.

7.3 *State whether or not the Department of Land Affairs been identified as an interested and affected party.*

Yes as they administer all communal land together with the local authority.

7.4 *State specifically whether or not a land claim is involved.*

No land claim is registered against the property.

7.5 *Name the Traditional Authority identified*

No Traditional Authority only local municipality

7.6 *List the landowners identified by the applicant. (Traditional and Title Deed owners)*

The proposed prospecting area is situated on a portion of the Remainder of the Farm Steinkopf No 22. Registered in the name of The Gemeenskap van Concordia

7.7 *List the lawful occupiers of the land concerned.*

The only lawful occupiers are the members of the community of Steinkopf. No settlements or infrastructure are however present on the proposed prospecting area and the only economic activity is marginal small stock grazing.

7.8 *Explain whether or not other persons' (including on adjacent and non-adjacent properties) socio-economic conditions will be directly affected by the proposed prospecting or mining operation and if not, explain why not.*

All adjacent properties belong to the community of Concordia and the only economic land use on the properties is marginal small stock grazing and granite mining and or prospecting.

7.9 *Name the Local Municipality identified by the applicant*

Nama Khoi Local Municipality and Namakwa District Municipality

7.10 *Name the relevant Government Departments, agencies and institutions responsible for the various aspects of the environment and for infrastructure which may be affected by the proposed project.*

Department Environment and Conservation responsible for scrutinizing all EMP's for new developments.

Department of Land Affairs as administrator of all communal land

No listed activity in terms of Nema will take place.

No infrastructure present on the proposed prospecting area.

7.11 *Submit evidence that the landowner or lawful occupier of the land in question, and any other interested and affected parties including all those listed above, were notified.*

7.11.1 Description of the information provided to the community, landowners, and interested and affected parties.

A copy of the PWP and the scoping report (consultation template) was supplied and or explained to them.

7.11.2 List of which parties identified in 7.10 above that were in fact consulted, and which were not consulted.

Consultation with the community of Concordia has taken place through the Nama Khoi municipality and Department Land Affairs

All other interested parties were invited to comment on the proposed project by means of an advertisement in the local newspaper

All comments were supposed to be directed to the regional director DMR with copies to the applicant. No comments were received.

7.11.3 List of views raised by consulted parties regarding the existing cultural, socio-economic or biophysical environment.

No views or comment received

7.11.4 List of views raised by consulted parties on how their existing cultural, socio-economic or biophysical environment potentially will be impacted on by the proposed prospecting or mining operation

No views or comment received

7.11.5 Other concerns raised by the aforesaid parties

No views or comment received

7.11.6 Confirmation that minutes and records of the consultations are appended.

The landowners are deemed the only affected party and consultation has taken place by means of registered letters and/or personal communication Consultation with the community of Steinkopf has taken place through the Nama Khoi municipality and Department Land Affairs

All other interested parties were invited to comment on the proposed project by means of an advertisement in the local newspaper.

All comments were supposed to be directed to the regional director DMR with copies to the applicant. No comments were received.

7.11.7 Information regarding objections received.

No objections against the proposed prospecting operation that need to be dealt with by the REMDEC committee were received. All comments received were included and addressed in this EMP.

7.12 *The manner in which the issues raised were addressed.*

All comments received were included and addressed in this EMP.

8 SECTION 39 (3) (c) of the Act: Environmental awareness plan.

8.1 Employee communication process

General environmental awareness will be fostered among the project's workforce to encourage the implementation of environmentally sound practices throughout its duration. This will ensure that environmental accidents are minimized and environmental compliance maximized.

Environmental awareness will be fostered in the following manner:

- a) Induction course for all workers on site, before commencing work on site.
- b) Refresher courses as and when required
- c) Daily toolbox talks at the start of each day with all workers coming on site, where workers can be alerted to particular environmental concerns associated with their tasks for that day or the area/habitat in which they are working.
- d) Taking part in national and international environmental campaigns like National Marine Week, National harbour day, National Wetlands day exacta.
- e) Displaying of information posters and other environmental awareness material in the general assembly points.

8.2 Description of solutions to risks

Specific environmental awareness performance criteria will form part of the job descriptions of employees, to ensure diligence and full responsibility at all levels of the organisational work force.

General environmental awareness will be fostered among the project's workforce to encourage the implementation of environmentally sound practices throughout its duration. This will ensure that environmental accidents are minimized and environmental compliance maximized.

8.3 Environmental awareness training.

The goal of training is to enable a shared understanding and common vision of the environment, the impact of a mining operation on the environment (and why this is important) and the role of mining personnel in terms of environmental management and compliance.

The induction course will compose of the following steps:

- The first step will include background discussion of the environment concept: of what it comprises and how we interact with it.
- The second step will be a description of the components and phases of the specific mining operation.
- The third step will be a general account of how the mining operation and its associated activities can affect the environment, giving rise to what we call Environmental Impacts.
- The fourth and most important step will be a discussion of what staff can do in order to help prevent the negative environmental impacts from degrading our environment. This is known as Environmental Impact Management.

9 SECTION 39 (4) (a) (iii) of the Act: Capacity to rehabilitate and manage negative impacts on the environment.

9.1 The annual amount required to manage and rehabilitate the environment.

Refer to section 4 that covers regulation 52 (2) (d) that handles with financial provision.

9.2 Confirmation that the stated amount correctly reflected in the Prospecting Work Programme as required.

This amount was provided for in the cost estimate for the implementation of the PWP and proof of access to the necessary funds were supplied with the prospecting work program.

10 REGULATION 52 (2) (h): Undertaking to execute the environmental management plan.

Herewith I, the person whose name and identity number is stated below, confirm that I am the person authorised to act as representative of the applicant in terms of the resolution submitted with the application, and confirm that the above report comprises EIA and EMP compiled in accordance with the guideline on the Departments official website and the directive in terms of sections 29 and 39 (5) in that regard, and the applicant undertakes to execute the Environmental management plan as proposed.

Full Names and Surname	Jan Harm Steenkamp
Identity Number	5309125058089

-END-