



mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

DRAFT BASIC ASSESSMENT REPORT And ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

SUBMITTED FOR ENVIRONMENTAL AUTHORIZATIONS IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT, 1998 AND THE NATIONAL ENVIRONMENTAL MANAGEMENT WASTE ACT, 2008 IN RESPECT OF LISTED ACTIVITIES THAT HAVE BEEN TRIGGERED BY APPLICATIONS IN TERMS OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002 (MPRDA) (AS AMENDED).

**NAME OF APPLICANT: Dart Mining CC
Reg No.: 2004/066296/23
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FILE REFERENCE NUMBER SAMRAD: NC30/5/1/3/2/10911MP

Important Notice

In terms of the Mineral and Petroleum Resources Development Act (Act 28 of 2002 as amended), the Minister must grant a mining permit if among others the mining “will not result in unacceptable pollution, ecological degradation or damage to the environment”.

Unless an Environmental Authorisation can be granted following the evaluation of an Environmental Impact Assessment and an Environmental Management Programme report in terms of the National Environmental Management Act (Act 107 of 1998) (NEMA), it cannot be concluded that the said activities will not result in unacceptable pollution, ecological degradation or damage to the environment.

In terms of section 16(3)(b) of the EIA Regulations, 2014, any report submitted as part of an application must be prepared in a format that may be determined by the Competent Authority and in terms of section 17 (1) (c) the competent Authority must check whether the application has taken into account any minimum requirements applicable or instructions or guidance provided by the competent authority to the submission of applications.

It is therefore an instruction that the prescribed reports required in respect of applications for an environmental authorisation for listed activities triggered by an application for a right or a permit are submitted in the exact format of, and provide all the information required in terms of, this template. Furthermore, please be advised that failure to submit the information required in the format provided in this template will be regarded as a failure to meet the requirements of the Regulation and will lead to the Environmental Authorisation being refused.

It is furthermore an instruction that the Environmental Assessment Practitioner must process and interpret his/her research and analysis and use the findings thereof to compile the information required herein. (Unprocessed supporting information may be attached as appendices). The EAP must ensure that the information required is placed correctly in the relevant sections of the Report, in the order, and under the provided headings as set out below, and ensure that the report is not cluttered with uninterpreted information and that it unambiguously represents the interpretation of the applicant.

Objective of the basic assessment process

The objective of the basic assessment process is to, through a consultative process—

- (a) determine the policy and legislative context within which the proposed activity is located and how the activity complies with and responds to the policy and legislative context;
- (b) identify the alternatives considered, including the activity, location, and technology alternatives;
- (c) describe the need and desirability of the proposed alternatives,
- (d) through the undertaking of an impact and risk assessment process inclusive of cumulative impacts which focused on determining the geographical, physical, biological, social, economic, heritage, and cultural sensitivity of the sites and locations within sites and the risk of impact of the proposed activity and technology alternatives on these aspects to determine:
 - (i) the nature, significance, consequence, extent, duration, and probability of the impacts occurring to; and

- (ii) the degree to which these impacts —
- (aa) can be reversed;
- (bb) may cause irreplaceable loss of resources; and
- (cc) can be managed, avoided or mitigated;
- (e) through a ranking of the site sensitivities and possible impacts the activity and technology alternatives will impose on the sites and location identified through the life of the activity to—
 - (i) identify and motivate a preferred site, activity and technology alternative;
 - (ii) identify suitable measures to manage, avoid or mitigate identified impacts;
and
 - (iii) identify residual risks that need to be managed and monitored.

DEFINITIONS

Alternatives - In relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to –

- i. The property on which or location where it is proposed to undertake the activity;
- ii. The type of activity to be undertaken;
- iii. The design or layout of the activity;
- iv. The technology to be used in the activity, and;
- v. The operational aspects of the activity.

Baseline - Information gathered at the beginning of a study which describes the environment prior to development of a project and against which predicted changes (impacts) are measured.

Basic Assessment Process – This is the environmental assessment applied to activities listed in Government Notice No. R 983 (Listing 1) as amended by GNR 327 (dated 7/04/2017) and No. R985 (Listing 3) as amended by GNR 324 (dated 7/04/2017). These are typically smaller scale activities of which the impacts are generally known and can be easily managed. Generally, these activities are considered less likely to have significant environmental impacts and, therefore, do not require a full-blown and detailed Environmental Impact Assessment (see below).

Biodiversity - The diversity, or variety, of plants, animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity.

Borehole - Includes a well, excavation, or any other artificially constructed or improved groundwater cavity which can be used for the purpose of intercepting, collecting or storing water from an aquifer; observing or collecting data and information on water in an aquifer; or recharging an aquifer.

Community - Those people who may be impacted upon by the construction and operation of the project. This includes neighbouring landowners, local communities and other occasional users of the area.

Construction Phase - The stage of project development comprising site preparation as well as all construction activities associated with the development.

Consultation - A process for the exchange of views, concerns and proposals about a project through meaningful discussions and the open sharing of information.

Critical Biodiversity Area - Areas of the landscape that must be conserved in a natural or near-natural state in order for the continued existence and functioning of species and ecosystems and the delivery of ecosystem services.

Cumulative Impacts - Direct and indirect impacts that act together with current or future potential impacts of other activities or proposed activities in the area/region that affect the same resources and/or receptors.

Environment - The surroundings within which humans exist and that are made up of

- i. The land, water and atmosphere of the earth;
- ii. Micro-organisms, plant and animal life;
- iii. Any Part or combination of (i) and (ii) and the interrelationships among and between them; and
- iv. The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and wellbeing.

Environmental Authorisation (EA) – The authorisation by a competent authority of a listed activity.

Environmental Assessment Practitioner (EAP) – The person responsible for planning, management and co-ordination of environmental impact assessment,

strategic environmental assessments, environmental management plans or any other appropriate environmental instrument introduced through regulations.

Environmental Impact Assessment (EIA) – In relation to an application to which scoping must be applied, means the process of collecting, organizing, analysing, interpreting and communicating information that is relevant to the consideration of that application. This process necessitates the compilation of an Environmental Impact Report, which describes the process of examining the environmental effects of a proposed development, the anticipated impacts and proposed mitigatory measures.

Environmental Impact Report (EIR) - A report assessing the potential significant impacts as identified during the Scoping phase.

Environmental Management Programme (EMPr) - A management programme designed specifically to introduce the mitigation measures proposed in the Reports and contained in the Conditions of Approval in the Environmental Authorisation.

Gross Domestic Product (GDP) by region - represents the value of all goods and services produced within a region, over a period of one year, plus taxes minus subsidies.

Hydrocarbons – Oils used in machinery as lubricants, including diesel and petrol used as fuel.

Impact - A change to the existing environment, either adverse or beneficial, that is directly or indirectly due to the development of the project and its associated activities.

Interested and Affected Party (I&AP) – Any individual, group, organization or associations which are interested in or affected by an activity as well as any organ of state that may have jurisdiction over any aspect of the activity.

Municipality –

(a) Means a metropolitan, district or local municipality established in terms of the Local Government: Municipal Structures Act, 1998 (Act No. 117 of 1998); or

(b) In relation to the implementation of a provision of this Act in an area which falls within both a local municipality and a district municipality, means

(i) The district municipality, or

(ii) The local municipality, if the district municipality, by agreement with the local municipality, has assigned the implementation of that provision in that area to the local municipality.

NEMA EIA Regulations - The EIA Regulations means the regulations made under section 24(5) of the National Environmental Management Act (Act 107 of 1998) (Government Notice No. R 982, R 983, R984 and R 985 in the Government Gazette of 4 December 2014 refer as amended by GNR 324, 325, 326 and 327 of 7 April 2017.

No-Go Alternative – The option of not proceeding with the activity, implying a continuation of the current situation / status quo

Public Participation Process (PPP) - A process in which potential Interested and Affected Parties are given an opportunity to comment on, or raise issues relevant to, specific matters.

Registered Interested and Affected Party – All persons who, as a consequence of the Public Participation Process conducted in respect of an application, have submitted written comments or attended meeting with the applicant or environmental assessment practitioner (EAP); all persons who have requested the applicant or the EAP in writing, for their names to be placed on the register and all organs of state which have jurisdiction in respect of the activity to which the application relates.

Scoping process - A procedure for determining the extent of and approach to an EIA, used to focus the EIA to ensure that only the significant issues and reasonable alternatives are examined in detail

Scoping Report – The report describing the issues identified during the scoping process.

Significant impact – Means an impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment.

Spatial Development Framework (SDF) - A document required by legislation and essential in providing conservation and development guidelines for an urban area, which is situated in an environmentally sensitive area and for which major expansion is expected in the foreseeable future.

Specialist study - A study into a particular aspect of the environment, undertaken by an expert in that discipline.

Stakeholders - All parties affected by and/or able to influence a project, often those in a position of authority and/or representing others.

Sustainable development - Sustainable development is generally defined as development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs. NEMA defines sustainable development as the integration of social, economic and environmental factors into planning, implementation and decision-making so as to ensure that development serves present and future generations.

Visibility - The area from which the project components would actually be visible and depends upon topography, vegetation cover, built structures and distance.

Visual Character - The elements that make up the landscape including geology, vegetation and land-use of the area.

Visual Quality - The experience of the environment with its particular natural and cultural attributes.

Visual Receptors - Individuals, groups or communities who are subject to the visual influence of a particular project.

ACRONYMS AND ABBREVIATIONS

amsl	Above mean sea level
BA	Basic Assessment
BPEO	Best Practicable Environmental Option
CBA	Critical Biodiversity Area
DM	District Municipality
DMR	Department of Mineral Resources
DWS	Department of Water and Sanitation
DSR	Draft Scoping Report
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report
EMPr	Environmental Management Programme
ESA	Ecological Support Area
ESa	Early Stone Age
FoT	“Free on Truck “: means there is no processing and that it’s a raw product.
FSR	Final Scoping Report
GA	General Authorisation
GDP	Gross Domestic Product
GDPR	Regional Gross Domestic Product
GGP	Gross Geographic Product
GNR	Government Notice Reference
ha	Hectares
HIA	Heritage Impact Assessment
I&APs	Interested and Affected Parties
IDP	Integrated Development Plan
IEM	Integrated Environmental Management
km	Kilometres
km ²	Square kilometres
LED	Local Economic Development
LM	Local Municipality
LoM	Life of Mine
LN	Listing Notice
L/s	Litres per second
LSA	Late Stone Age
m ³	Metres cubed
MAP	Mean Annual Precipitation
MAPE	Mean Annual Potential Evaporation
MASMS	Mean Annual Soil Moisture Stress (% of days when evaporation demand was more than double the soil moisture supply)
MFD	Mean Frost Days
MPRDA	Mineral and Petroleum Resources Development Act 28 of 2002
MSA	Middle Stone Age
MSDS	Material Safety Data Sheet
NEMA	National Environmental Management Act 107 of 1998 as amended
NEM:BA	National Environmental Management: Biodiversity Act 10 of 2004
NEM:WA	National Environmental Management: Waste Act 59 of 1998
NFEPA	National Freshwater Ecosystem Priority Area
NHRA	National Heritage Resources Act 25 of 1999

NWA	National Water Act 36 of 1998
PES	Present Ecological State
RDL	Red Data List
ROM	Run of Mine
S&EIR	Scoping and Environmental Impact Reporting
SAHRA	South African National Heritage Resources Agency
SCC	Species of Conservation Concern
SDF	Spatial Development Framework
SLP	Social and Labour Plan
StatsSA	Statistics South Africa
WMA	Water Management Area
WML	Waste Management License
WUL A	Water Use License Application

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PART A
SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

1 Contact Person & Contact Details

1.1 Details of EAP

Name of The Practitioner: N.J. van Zyl

EAPSA Registration: 2019/2034

Tel No.: 082 8898696; Fax No.: 086 6562942

e-mail address: klaaskraalbos@gmail.com

1.2 Expertise of the EAP

The qualifications of the EAP

Current qualifications in this field were obtained through formal studies at the Cape Town Technicon, Nelson Mandela Metropolitan University and the University of the Orange Free State, which is the following:

- National Diploma Nature Conservation (1986)
- National Higher Diploma (B-Tech) Nature Conservation (1992)
- Master's Degree Environmental Management (MOB 750) (2001)

Further qualifications in this field were also obtained through short courses at the University of the Orange Free State, which is the following:

Environmental Impact Assessment (2001)

Wildlife Management through Veld Management (2001)

Resource evaluation and game ranch management (2003)

Arc GIS (2009)

Summary of the EAP's past experience.

With the implementation of the Mineral and Petroleum Resources Development Act 28 of 2002 Mr. van Zyl has started assisting small scale miners with all facets of applications for mining permits in terms of section 27 and prospecting rights in terms of section 16 of the MPRDA. Mr van Zyl has an excellent knowledge of the relevant acts applicable to the mining sector including the following:

- Mineral and Petroleum Resources Development Act 28 of 2002
- Mineral and Petroleum Resources Development Amendment Act 49 of 2008
- Mineral and Petroleum Resources Regulations 2004
- National Environmental Management Act 107 of 1998 as amended
- National Environment Laws Amendment Act 25 of 2014 as amended
- NEMA: Environmental Impact Assessment Regulations, 2014
- NEMA: Financial Provisioning Regulations, 2015
- NEMA: Waste Act 59 of 2008 as amended
- NEMA: Regulations regarding the Planning and Management of Residue Stockpiles and Residue Deposits, 2015
- National Water Act 36 of 1998 as amended (with special attention to section 21 water uses)

Since 2002 Mr. van Zyl completed more than 150 applications for mining permits and more than 100 applications for prospecting rights. The mineral regulations and environmental management for most of these projects were managed throughout the life of the project including:

- Applications – manual and Samrad
- Prospecting work programs including financial and technical competence
- Public participation process
- EIA and EMP's now BAR and EMP's

- Annual Rehabilitation Plans
- Final Rehabilitation, Decommissioning and Mine Closure Plans including Risk Assessment Reports
- Execution and registration of rights including sec 42 diagrams for MPTR0
- Performance audits including reviews of Annual Closure Plans and Rehabilitation, Decommissioning and Mine Closure Plans together with financial quantum reviews.
- Application for closure certificate

Although Mr. van Zyl specializes in small scale mining operations and prospecting operations that requires investigation, assessment and communication according to the procedure as prescribed in regulations 19 and 20 of the EIA Regulations he also assists 5 mining rights with environmental management. Other sections of the MPRDA that Mr. van Zyl has experience in is:

- Section 102 applications and Section 20 applications
- Section 53 Applications and Section 11 Applications

2 Location of the overall Activity

Farm Name:	Portion of Farm Aardvark No 164
Application area (Ha)	5 Ha
Magisterial district:	Namakwaland
Distance from nearest town	50 Km West from Steinkopf on R382
21-digit Surveyor General Code	C05300000000016400001

3 Locality map

Refer to the locality plan attached at **Figure 1**. **Figure 2** shows the properties and coordinates.

Figure 1: Locality map

contemplated in regulation 2(2) read with regulation 2(3) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 30 of 2002)

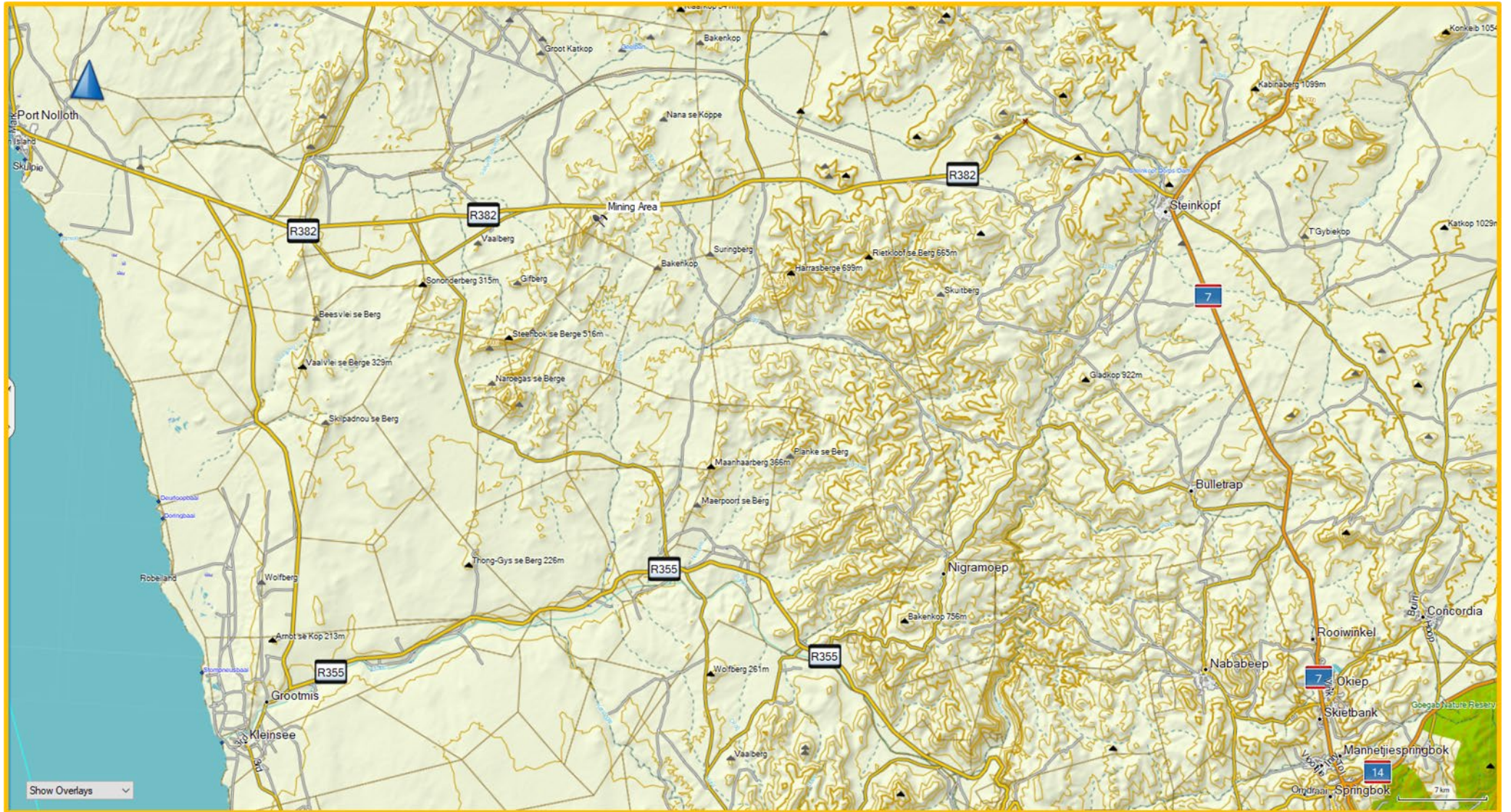


Figure 2: Layout plan

contemplated in regulation 2(2) read with regulation 2(3) of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 30 of 200

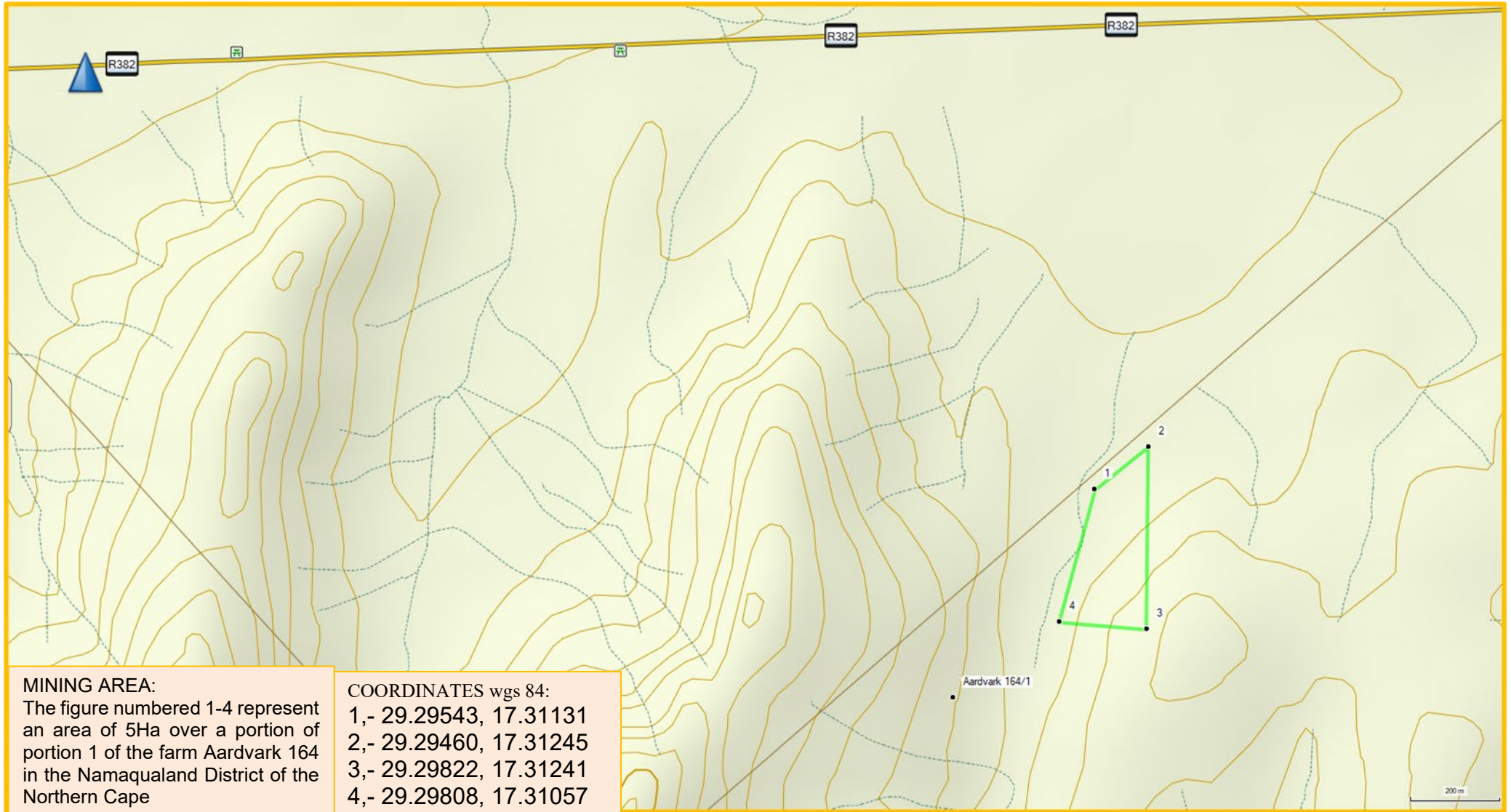


Figure 3: Landscape showing historic road quarry



4 Description of the scope of the proposed overall activity

The applicant proposes to reopen an existing burrow pit on a 5-ha portion of the Farm Aardvark No 164, in the Namaqualand District of the Northern Cape Province (“the property”). The property is registered in the name of Jorrie Dippenaar Trust by virtue of title deed T18992/2000.

Mining will be in the form of an opencast mine that will continue from an existing burrow pit (Refer figure 3). Disturbed areas will be demarcated as laydown and stockpile areas. Any virgin areas allocated for mining and stockpiling would first be stripped of all available topsoil. This topsoil would be stockpiled separately for later use when the quarry is rehabilitated. Any oversize material and rocks will be removed and stockpiled separately for later use when the quarry is rehabilitated.

The proposed activity will entail blasting using explosives in order to loosen the hard rock from the existing quarry on the property. The loosened hard rock will be crushed and screened using a mobile crusher whereafter it will be transported to be stockpiled until sold.

At final closure all leftover product stockpiles as well as oversize material will be backfilled into the excavation and the sides of the excavation will be profiled to form an even depression.

Natural aggregates are used in its natural state, and does not require concentration and extraction from an ore. It is these latter two processes that usually results in significant environmental impacts such as acid mines drainage and other toxic effects associated with many of the metal extraction industries, and are therefore not applicable to this type of mining. The implementation of the mitigating and management measures prescribed in the annual rehabilitation plan will ensure concurrent rehabilitation and after implementation of the mitigating measures most impacts can be classified as insignificant especially when looking at the current state of the environment.

4.1 Listed and specified activities

NAME OF ACTIVITY	Aerial extent of Activity Ha or m ²	LISTED ACTIVITY	APPLICABLE LISTING NOTICE	WASTE MANAGEMENT AUTHORISATION
Mine planning including development of stockpiles and haul roads				
Demarcate mining areas as defined in Mine Plan Using visible poles as demarcation system.	1Km	No	NA	No
Conduct Environmental Induction training	All staff members	No	NA	No
All access roads are already in place and only needs maintenance	1Km	No	NA	No
Prepare areas for infrastructure such as: Mobile containers for site office and secure storage area Waste management facilities (laydown areas, waste scrap salvage yard, petrochemical and hazardous waste storage; bio-cell/soil farm); Product stockpile and dispatch yards; Disturbed areas will be demarcated as laydown and stockpile areas	Laydown and Logistics Approx. 0.5 Ha	Yes	LN1 Notice R 983 (dated 4/12/ 2014), as amended by Notice 327 (dated 7/04/2017), 706 (dated 13/07/2018) and 517 (dated 11/06/2021). Activity 21: Any activity including the operation of that activity which requires a mining permit in terms of section 27 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in Listing Notice 1 or in Listing Notice 3 of 2014, required to exercise the mining permit.	No
Hydrocarbon storage	< 30m ³	No	NA: Will be less volume than limits for EA	No
Sanitation requirements (chemical toilets)	Part of logistics	No	NA	No
Operational phase including blasting and crushing				
Opencast mine that will continue from an existing burrow pit. The proposed activity will entail blasting using explosives in order to loosen the hard rock from the existing quarry on the property. The loosened hard rock will be crushed and screened using a mobile crusher whereafter it will be transported to be stockpiled until sold.	Total footprint is 5 Ha	Yes	LN1 Notice R 983 (dated 4/12/ 2014), as amended by Notice 327 (dated 7/04/2017), 706 (dated 13/07/2018) and 517 (dated 11/06/2021). Activity 21: Any activity including the operation of that activity which requires a mining permit in terms of section 27 of the Mineral and Petroleum Resources Development Act, as well as any other applicable activity as contained in Listing Notice 1 or in Listing Notice 3 of 2014, required to exercise the mining permit.	Refer to Waste Activities included below where applicable.

Any virgin areas allocated for mining and stockpiling would first be stripped of all available topsoil. This topsoil would be stockpiled separately for later use when the quarry is rehabilitated. Any oversize material and rocks will be removed and stockpiled separately for later use when the quarry is rehabilitated. Overburden and waste rock will be used to level the mine floor and to create an even depression.	Product stockpile ±0.5 Ha	No	NA	GNR 632 (dated 24/07/2015): Regulations regarding the Planning and Management of Residue Stockpiles and Residue Deposits from a Prospecting, Mining, Exploration or Production Operation
Decommissioning phase including safety measures for remaining excavations				
Backfill leftover product in excavations and fence remaining dangerous excavations securely	±1000m ³	No	Na	GNR 633 (dated 24/07/2015): Category A: Residue stockpiles or residue deposits (15) The establishment or reclamation of a residue stockpile or residue deposit resulting from activities which require a prospecting right or mining permit in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002).
Remove all structures, foundations and footings not required by landowner	±0.5 Ha	No	Na	GNR 921 (dated 29/11/ 2013) Category A: Decommissioning of facilities and associated structures and infrastructure (14) The decommissioning of a facility for a waste management activity listed in Category A or B of this schedule.
Rip all hardened areas and allow to revegetate naturally	± 1Ha	No	Na	
AFTERCARE PERIOD				
Remove alien vegetation, if present	Total area 5Ha	No	Na	No
Conduct final environmental audit	Total area 5Ha	No	Na	No
Lodge Closure Application	Total area 5Ha	No	Na	No.

4.2 Description of the activities to be undertaken

The project is divided into three phases as listed below:

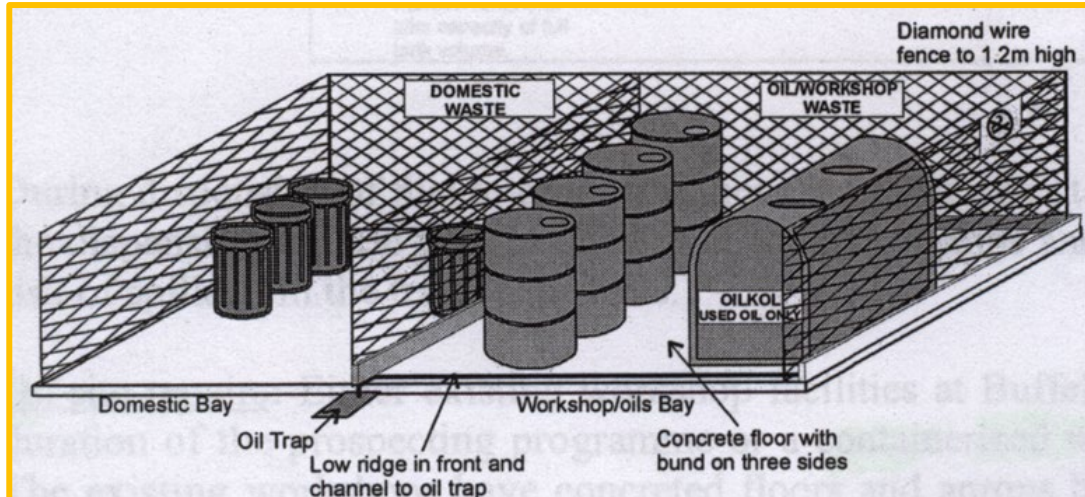
- Construction, including the planning and implementation phases, creation of infrastructure, mine or pit footprint, access ramps and haul roads, waste, residue and product stockpiles, handling areas, water reticulation and provision of power.
- Operation, including daily activities, mine development and expansion.
- Decommissioning and Closure, including scaling down of activities ahead of temporary or permanent closure, cessation of mining or production, implementation of the rehabilitation program, monitoring and maintenance for prescribed period after cessation of operations; and closure, including completion of rehabilitation goals, application for closure, transfer of liability to the State and agreed post-closure monitoring or maintenance.

The methodology and technology to be employed in each phase is described below:

Construction Phase: Development of infrastructure and logistics

- Access and service roads: Access to the mine works will be via the R382 main road between Steinkopf and Port Nolloth and existing farm tracks as shown in Figure 1 to 3. Existing farm tracks will be used as haul roads and no new roads will be developed.
- Water supply: No process water is used in the mining process.
- Electricity supply: No electricity is used in the mining area.
- Logistics: No infrastructure is present or will be required due to the small scale and simple mining method.
- A stockpile area of less than 0.5Ha will be developed that will also serve as parking area and laydown area with service bay for minor repairs and maintenance of machinery.
- Secure storage for stores and equipment will be provided in the form of mobile containers and ablutions will also consist of mobile units.
- Limited waste management facilities will be put in place as part of the laydown area and will consist of the following:
 - Domestic Waste Management (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).
 - 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 (Refer Figure 4 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 4: Proposed layout of temporary waste storage area



- Diesel and Lubricant Handling Program:
 - Refueling either of equipment or of the mobile trailer bowser must make use of a drip tray or PVC lining.
 - Generator bays need to be fitted with a steel tray equipped with a drain along its extremities to collect any oil and diesel contaminated run-off and channel it to the oil trap where separated oil will be collected and disposed of in the oil recycling container. Any oil spills are to be treated with Spillsorb or equivalent as per the product instructions.
- On-site repairs:
 - Drip trays 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. 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.
- 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.
 - Used oils will be stored in drums provided by the oil recycling companies such as Oilkol.
 - A PVC facility or impervious platform and fence with signposts are to be constructed to store used oil and drums containing used spares, cloths, etc. which are oil contaminated and must be temporarily stored for collection/dispatch to suitable regional disposal site.
 - 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.

Operational Phase

The proposed mining operation will be a continuation of historic mining operations (Figure 3). The mining area is situated within the Namaqualand which is characterized by granite outcrops.

Mining will be in the form of an opencast mine and stone aggregate would be mined from the burrow pit. The proposed activity will entail blasting using explosives in order to loosen the hard rock from the existing quarry on the property. The loosened hard rock will be crushed and screened using a mobile crusher whereafter it will be transported to be stockpiled until sold. Virgin areas allocated for mining and stockpiling would first be stripped of all available topsoil. This topsoil would be stockpiled separately for later use when the quarry is rehabilitated. Any oversize material and rocks will be removed and stockpiled separately for later use when the quarry is rehabilitated.

Processing will take place by crushing and screening making use of a mobile crusher plant. The estimated footprint of the excavation is 3Ha and at final closure the sides of the excavation will be profiled to form an even depression.

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 a Performance audit on the implementation of the Environmental Management Plan.

The only surface disturbance except for the mining of the outcrop, will be a small laydown area. This area will also serve as parking area and final sorting and stockpile area.

Decommissioning and Closure Phase

Planning for closure and restoration from the beginning of an operation makes the process more efficient:

- Waste can be removed as it is created,
- Excavation can be planned so that topography restoration is less complicated, and
- Topsoil can be re-used at shorter interval.
- Establishing a closure strategy (and communicating that activity to the public) can help enhance the company's reputation as a socially-responsible operation.
- Rehabilitation is carried out on a continuous basis as work progresses according to the annual rehabilitation plan. This will be monitored continuously to ensure effective restoration and revegetation of disturbed areas. The rehabilitation work will be conducted in-house under the supervision of an ECO.

The decommissioning and closure phase at the end of the life of the mine will consist of implementing the Final Rehabilitation, Decommissioning and Closure Plan (attached at Annexure 1).

5 Policy and Legislative Context

APPLICABLE LEGISLATION AND GUIDELINES USED TO COMPILE THE REPORT	REFERENCE WHERE APPLIED	HOW DOES THIS DEVELOPMENT COMPLY WITH AND RESPOND TO THE LEGISLATION AND POLICY CONTEXT
Legislation		
<p>Constitution of South Africa, specifically everyone has a right;</p> <p>a. to an environment that is not harmful to their health or wellbeing; and</p> <p>b. to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that:</p> <p>i. prevents pollution and ecological degradation;</p> <p>ii. promote conservation; and</p> <p>iii. Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.</p>	Mining activities	The mining activities shall be conducted in such a manner that significant environmental impacts are avoided, where significant impacts cannot all together avoided be minimised and mitigated in order to protect the environmental right of South Africans.
<p>Minerals and Petroleum Development Resources Act, Act 28 of 2002 (MPRDA) section 16 (as amended)</p> <p>MPRDA Regulations as amended by GNR349 of 18 April 2011.</p>	Application to the DMR for a mining permit in terms of Section 27 for an area not exceeding 5 hectares in extent.	The conditions and requirements attached to the issuing of the Mining Permit will apply to the mining activities. DMR is the Competent Authority (CA) for this NEMA and NEM:WA application.
Mine, Health and Safety Act (Act 29 of 1996) and Regulations	Mining activities	Control measures are to be Implemented upon the approval of the EMPr.
<p>National Environmental Management Act, No 107 of 1998 (as amended) (NEMA)</p> <p>GNR 983 Listing Notice 1 of 2014 (dated 8 December 2014), as amended by GNR 327 (dated 7 April 2017) Listing Notice 1, Activity 21</p> <p>Financial Provisioning Regulations 2015 as amended by GNR639 of 21 September 2018</p>	<p>Application to the DMR for Environmental Authorisation in terms of the 2014 EIA Regulations</p> <p>Annexure 1 Final Rehabilitation, Decommissioning and Mine Closure Plan including rehabilitation cost calculations</p>	<p>An Application for Environmental Authorisation must be submitted to DMR for an Environmental Authorisation.</p> <p>The listed activities that are triggered determine the Environmental Authorisation (EA) application process to be followed.</p> <p>The appropriate EA will be obtained before proceeding with any mining activities.</p> <p>Measures will be implemented to prevent any pollution occurring during the mining activities. The disturbed area shall be rehabilitated in such a way that is stable, non-polluting, non-eroded, free from alien invasive species and suitable for the agreed post closure land use.</p> <p>The compilation of this Basic Assessment Report, Final Rehabilitation, Decommissioning and Mine Closure Plan and the Public Participation Process are required in terms of NEMA.</p>

<p>National Environmental Management: Waste Act, Act 59 of 2008 (NEMWA)NEM: WA (as amended)</p> <p>Waste listed activities in GNR 921 (dated 29/11/ 2013)</p> <p>Regulations regarding the planning and management of residue stockpiles and residue deposits from a prospecting, mining, exploration or production operation in GNR 632 of 24 July 2015.</p>	<p>Refer to Sec 4.1 for the waste listed activities in GNR 921 (dated 29/11/ 2013) Category B: Disposal of waste on land.</p>	<p>The listed activities that are triggered determine the Environmental Authorisation (EA) application process to be followed. The Application for Environmental Authorization has included these listed wastes activities as shown in Table 2 Mitigation measures for the waste are included in the EMPr, and Closure Plan (Annexure 1).</p>
<p>Hazardous Substances Act (Act 15 of 1973) and Regulations read together with NEMA and NEMWA Definition, classification, use, operation, modification, disposal or dumping of hazardous substances.</p>	<p>Sect 16 EMPr General waste management measures as part of environmental awareness plan</p>	<p>The generation of potential waste will be minimized through ensuring employees of the Applicant are subjected to the appropriate environmental awareness campaign before commencement of mining. All waste generated during the mining activities will be disposed of in a responsible legal manner. Proof of legal disposal will be maintained on site.</p>
<p>National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) [NEMBA] National list of ecosystems that are threatened and in need of protection, 2011 (in GN 1002 dated 2 December 2011)</p>	<p>Section 8 Figure 5, 6, 7 & 8.</p>	<p>Part of the mining area is located within a CBA 1 and the rest within a CBA 2 and not within a River NFEPA or FEPA management area. The mining area itself is however transformed by historic mining activities.</p>
<p>Fencing Act (Act 31 of 1963) Section 17: States that any person erecting a boundary fence may clean any bush along the line of the fence up to 1.5m on each side thereof and remove any tree standing in the immediate line of the fence. However, this provision must be read in conjunction with the environmental legal provisions relevant to protection of flora</p>	<p>Section 8</p>	<p>Restriction on vegetation clearing is included in the EMPr.</p>
<p>National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004) [NEMBA] Alien and Invasive Species List, 2016 (in GN No. 864 dated 29 July 2016)</p>	<p>Section 8</p>	<p>Alien invasive vegetation management is included in the EMPr.</p>
<p>Conservation of Agricultural Resources Act (Act 43 of 1983) CARA Regulation GN R1048, published on 25 May 1984 Section 5: Implementation of control measures for alien and invasive plant species; Section 6: Control measures</p>	<p>Section 8</p>	<p>Control measures are to be Implemented upon the approval of the EMPr.</p>
<p>National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004). National Dust Control Regulations in GN R827 of 1 November 2013</p>	<p>Section 8</p>	<p>Dust control measures are included in the EMPr</p>

National Heritage Resources Act, 25 of 1999 (“NHRA”)	Section 8	Refer to Annexure 3 for a copy of the Heritage Impact Assessment to be included as part of final BAR
National Water Act (Act 36 of 2008)	Section 8	No Water Use activities in terms of Section 21 will be triggered as water will be obtained from the local authority and trucked onto site.
Promotion of Administrative Justice Act, 2000 (Act 3 of 2000) [PAJA]	Decision by the Competent Authority	Gives effect to section 33 of the Constitution that requires that “Everyone has the right to administrative action that is lawful, reasonable and procedurally fair”. All administrative actions must be based on the relevant considerations
Road Traffic Act (Act 93 of 1997) and Regulations	Section 8	Control measures are included in the EMPr
Spatial Planning and Land Use Management (Act 16 of 2013 (SPLUMA) Regulations GN R239 published on 23 March 2015 in terms of SPLUMA	Comments required from the Nama Khoi Local Municipalities.	Consent use in terms of the Municipal Planning By-Law, 2015 is required to permit mining on properties that are zoned for Agricultural purposes.
Municipal Plans and Policies		
Namakwa District Municipality Integrated Development Plan (IDP) 2017/2022	Section 6	The Need & Desirability of the project is referenced in terms of the District Municipality IDP, specifically relating to employment creation, and ensuring the implementation of environmentally sustainable practices, along with an integrated approach to addressing climate change response, which are included in the EMPr
Nama Khoi Local Municipality Integrated Development Plan (IDP), 2018/2019	Section 6	The Need & Desirability of the project is referenced in terms of the IDP, specifically relating to employment creation and sustainable resource utilisation. Relevant mitigation measures are included in the EMPr.
Standards, Guidance and Spatial Tools		
Department of Environmental Affairs, Department of Mineral Resources, Chamber of Mines, South African Mining and Biodiversity Forum, and South African National Biodiversity Institute. 2013. Mining and Biodiversity Guideline: Mainstreaming biodiversity into the mining sector. Pretoria.	Section 6 & 8. Figure 5	The mitigation measures to address and mitigate the potential impacts of the mining are included in the EMPr.
DEA Guideline on Need & Desirability (2017)	Section 6.7	
DEA Guideline on PPP DMR Guideline on Consultation with Communities and I&APs (undated)	Section 8.2 & 8.3	Used during PPP
DEAT Integrated Environmental Management Information Series 5: Impact Significance (2002)	Section 8	Used during Impact Assessment
DEAT Integrated Environmental Management Information Series 7: Cumulative Effects Assessment (2004)	Section 8	Used during Impact Assessment

Namakwa District Biodiversity Sector Plan (2008)	Baseline environmental description Section 8	Used during desktop research to identify sensitive environments within the mining right area.
BGIS (www.bgis.sanbi.org)		
SANS 10103:2008 The Measurement and Rating of Environmental Noise with Respect to Land Use, Health, Annoyance and to Speech Communication	Management / Monitoring measures	Used to set the standard allowable for noise mitigation measures are included in the EMPr.
SANS 1929:2005 Edition 1.1 – Ambient Air Quality Limits for Common Pollutants		Standard for dust fallout. Dust mitigation measures are included in the EMPr.

6 Need and desirability of the proposed activities

6.1 Mining and Biodiversity Guidelines (2013)

The Mining and Biodiversity Guidelines (2013)¹ state that: “Sustainable development is enshrined in South Africa’s Constitution and laws. The need to sustain biodiversity is directly or indirectly referred to in a number of Acts, not least the National Environmental Management: Biodiversity Act (No. 10 of 2004) (hereafter referred to as the Biodiversity Act) and is fundamental to the notion of sustainable development. International guidelines and commitments as well as national policies and strategies are important in creating a shared vision for sustainable development in South Africa”.

DMR, as custodian of South Africa’s mineral resources, is tasked with enabling the sustainable development of these resources. This includes giving effect to the constitutional requirement to “prevent pollution and ecological degradation; promote conservation; and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development”². The primary environmental objective of the MPRDA is to give effect to the “environmental right”³ contained in the South African Constitution. The MPRDA further requires the Minister to ensure the sustainable development of South Africa’s mineral resources, within the framework of national environmental policies, norms and standards, while promoting economic and social development.

The Mining and Biodiversity Guidelines (2013) document identifies four categories of biodiversity priority areas in relation to their biodiversity importance and implications for mining. The categories of relevance to this Mining area as shown in **Figure 5** are:

- Category A: Statutory Protected Areas – no risk for mining
- Category B: Highest Biodiversity importance – highest risk for mining
- Category C: High Biodiversity Importance – high risk for mining
- Category D: Moderate Biodiversity Importance – moderate risk for mining.

These categories have since been super-ceded by the Critical Biodiversity Area (CBA) map (refer to **Figure 10**), which would be interpreted as Category B is now CBA 1, Category C is now CBA 2 and Category D is now Ecological support areas.

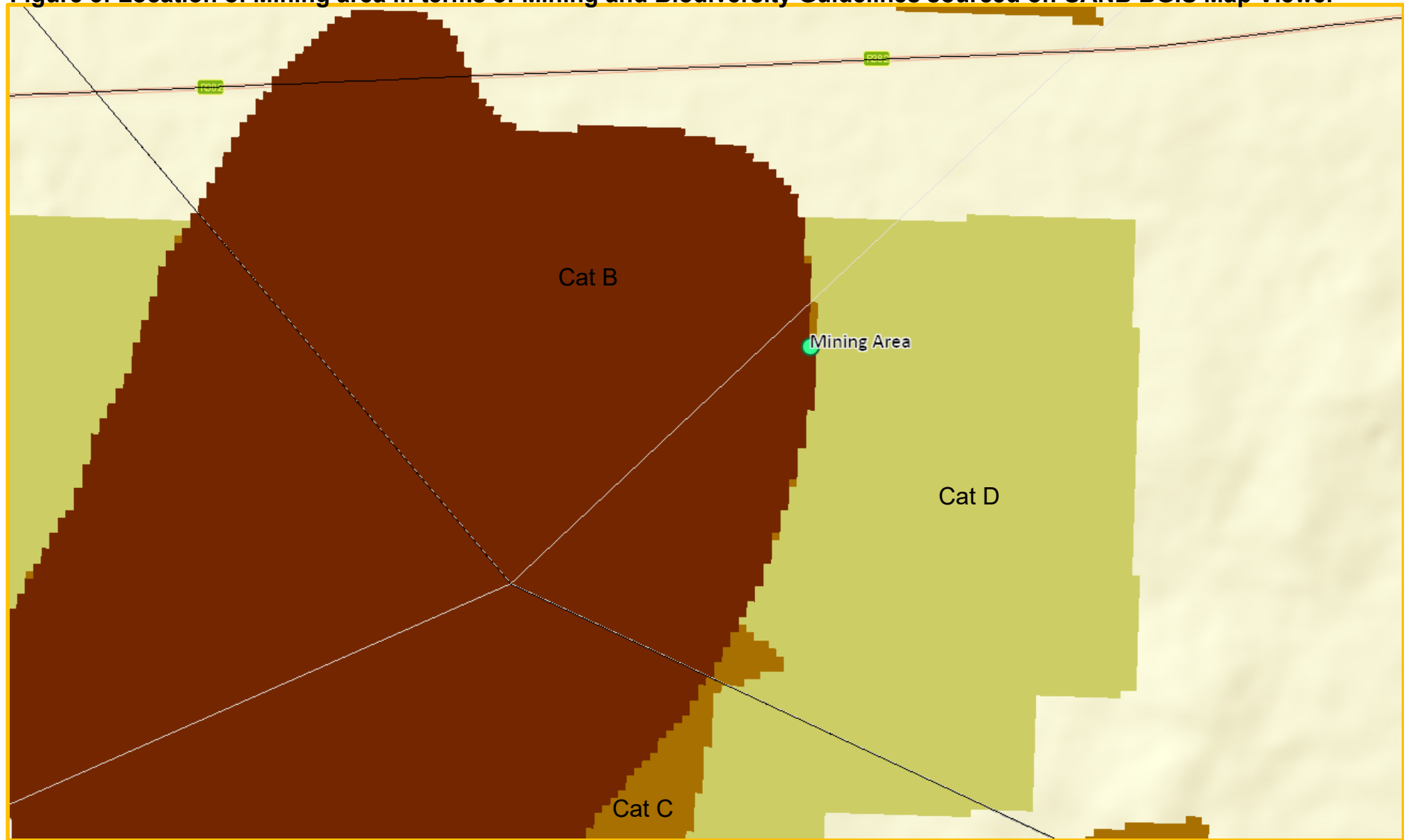
These categories basically require an environmental impact assessment process to address the issues of sustainability. This FBAR and EMPr provide the environmental impact assessment required for the activities triggered.

¹ Department of Environmental Affairs, Department of Mineral Resources, Chamber of Mines, South African Mining and Biodiversity Forum, and South African National Biodiversity Institute. 2013. Mining and Biodiversity Guideline: Mainstreaming biodiversity into the mining sector. Pretoria.

² Constitution of the Republic of South Africa (No. 108 of 1996).

³ Section 24 of the Constitution states that “everyone has the right (a) to an environment that is not harmful to their health or well-being; and (b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: prevent pollution and ecological degradation; promote conservation; and secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.”

Figure 5: Location of Mining area in terms of Mining and Biodiversity Guidelines sourced off SANB BGIS Map Viewer



6.2 Mining and Employment Benefits

For years, mining has been the driving force behind South Africa's economy and continues to make a valuable contribution to the country's economy. In addition, it supports Small-medium and micro sized enterprises (SMME's) and it is also one of the sectors that provide employment opportunities for unskilled and semi-skilled people.

The South African mining industry has its origin in small-scale mining activities, with these operations offering much needed employment opportunities and entrepreneurship, as well as contributing to the mineral sector and local economy.

Small-scale mining impact on employment is especially observed in the rural town where there are limited opportunities; providing significant livelihood for rural communities and a means of alleviating poverty. In terms of employment opportunities and job security at this mining area, there is a total of 15 employment opportunities.

6.3 Nama Khoi Local Municipality IDP

In the Constitution of South Africa (108 of 1996) the objectives of a municipality or local government structure are described as follows under "section 152. (1) The objects of local government are -

- (a) to provide democratic and accountable government for local communities;
- (b) to ensure the provision of services to communities in a sustainable manner;
- (c) to promote social and economic development;
- (d) to promote a safe and healthy environment; and
- (e) To encourage the involvement of communities and community organisations in the matters of local government".

The vision of the Nama Khoi Municipality is:

'To proudly deliver sustainable local economic development and climate resilient quality services to the Nama Khoi Municipality'

The development and implementation of the Nama Khoi Local Economic Development (LED) strategy aims at ensuring the alignment to the economic sectors and also assist the SMME's in co-operation with other stakeholders:

- ✓ To initiate, lead and sustain an environment for job creation in the Nama Khoi Municipal Area.
- ✓ To leverage municipal assets and the municipal procurement process with the view to stimulate redistribution and growth.

The Macro Strategic Development concept provides a broad spatial development framework for the total municipal area and contains spatial planning proposals based on the following concepts (only those of relevance referenced here):

SPATIAL OBJECTIVE 3: To develop sustainable and diverse local economies by the utilisation of opportunities in the different spatial categories.

MINING

- ✓ There is a concentration of minerals around the Springbok area (where this mining area is located), as well as in a broad band along the south of the Orange River.
- ✓ Although many of these sources have been depleted, there are still plenty occurrences that can be exploited and this should be considered for small scale mining.
- ✓ The Industrial mining corridor as indicated in the PSDF must be investigated for opportunities and exploited where possible.
- ✓ To solve the disputes and issues related to mining rights and to investigate the

possibility for local communities to gain access and limited mining rights in areas to be identified for this.

SPATIAL OBJECTIVE 4: To protect the pristine and unique natural environment with its four distinct bio-geographical regions by means of effective management and managed use.

CORE & BUFFER AREAS

- ✓ To protect and manage the following environmentally important areas in line with the objectives and targets of the NBSAP:
 - The western part of the local municipality from the coast to the east of the N7, which has been identified as a SANBI priority area; and
 - The western mountain ranges including the Kamiesberg and the Hantam which has been identified as a SANBI Escarpment.
- ✓ To protect the natural spaces affected by the Terrestrial and Aquatic Critical Biodiversity areas against development and overgrazing, due to its vital role in maintaining biodiversity.
- ✓ To support the Critical Biodiversity Corridor Linkages towards the surrounding municipalities.
- ✓ To expand the statutory protected conservation areas in the municipal area, i.e., Goegap Provincial Nature Reserve, Namaqua National Park.
- ✓ To rehabilitate all mining areas and damaged areas in the region and to remove and terminate unwanted activities and undesirable structures in and around protected areas.
- ✓ To investigate and eradicate the invasive Prosopis tree which poses a significant threat to biodiversity and ecosystem services in the Northern Cape Province of South Africa.

OTHER

- ✓ To ensure that future planning in the region consider the mitigation of climate change, including the curbing of greenhouse emissions associated with transport and electricity use. A Climate-Neutral Strategy is to be developed for the Northern Cape. The implementation of this strategy into land use management regulations would be mandatory on all municipalities and the private sector.
- ✓ To improve the urban areas' natural character through landscaping, tree planting, the development of natural parks and the protection of natural areas and (flowers) in the neighbourhoods.
- ✓ To rehabilitate the old mining areas to improve the environmental character of the area.
- ✓ To develop additional environmental awareness campaigns and environmental education programmes for the communities and visitors.

6.4 Namakwa District Municipality IDP

The vision of the Namaqua District Municipality IDP is: "Namakwa District Municipality, a centre of excellence!" The Mission Statement is:

- ✓ A government institution legislatively mandated to stimulate economic and social transformation within the jurisdiction of the Namakwa District Municipality;
- ✓ By fostering partnership with relevant institutions to ensure sustainable development;
- ✓ Proactively supporting and capacitating B-municipalities;
- ✓ Be a transparent and accountable centre of excellence; and,
- ✓ Provide local leadership on environmental sustainability and climate change response.

The Namakwa District Municipality adheres to the values contained in the Batho Pele Principles.

The effects of climate change, such as flood events, on the proposed mining project will be mitigated as per the measures to be contained in the EMPr. The mitigation for emissions of greenhouse gases from vehicles and machinery associated with the mining activities will be addressed in the EMPr and Closure and Rehabilitation Plan.

6.5 Northern Cape Provincial Spatial Development Framework (NCPSTDF)

The NCPSTDF states that the: "Cape is not one of South Africa's richest provinces in monetary terms. Accordingly, there is a need for coherent prioritisation of projects within a spatial economic framework that takes due cognisance of environmental realities and the imperative to create a developmental state". The NCPSTDF was designed as an integrated planning and management tool for all spheres of government to facilitate on-going sustainable development throughout the province.

The NCPSTDF, together with the Provincial Growth and Development Strategy (PGDS), is set to fulfil an important role as a spatial and strategic guideline that addresses the key challenges of poverty, inequality and environmental degradation through the innovative use of the resources (capital) of the province for the benefit of all concerned."

The potential for job security, employment and skills transfer are identified as positive environmental impacts in this impact assessment. The potential negative environmental impacts will be mitigated through the implementation of the EMPr and the Closure and Rehabilitation Plan, to ensure a sustainable mining activity.

6.6 Northern Cape Provincial Growth and Development Strategy (NCPGDS)

The NCPGDS has the following vision for the province: "Building a prosperous, sustainable growing provincial economy to reduce poverty and improve social development." The strategy for the growth and development of the province is guided by the following key principles:

- ✓ Equality – notwithstanding the need to advance persons previously disadvantaged, development planning should ensure that all persons should be treated equally;
- ✓ Efficiency –the promotion of the optimal utilisation of existing physical, human and financial resources;
- ✓ Integration – the integration of spatially coherent regional and local economic development and improved service delivery systems.
- ✓ Good Governance – the promotion of democratic, participatory, cooperative and accountable systems of governance and the efficient and effective administration of development institutions;
- ✓ Sustainability – the promotion of economic and social development through the sustainable management and utilisation of natural resources and the maintenance of the productive value of the physical environment;
- ✓ Batho Pele – the placement of people and their needs at the forefront of its concern and serve their physical, psychological, developmental, economic, social and cultural interests equitably.

6.7 DEA Guideline on Need and Desirability (2017)

As referenced in the DEA Guideline on Need and Desirability (2017), NEMA defines "evaluation" as "the process of ascertaining the relative importance or significance of information, in the light of people's values, preferences and judgements, in order to make a decision." In evaluating each impact (negative and positive) in terms of each

of the aspects of the environment, "need and desirability" must specifically be considered in the analysis of each impact of the proposed activity. However, to determine if the proposed activity is the best option when considering "need and desirability", it must also be informed by the sum of all the impacts considered holistically. In this regard "need and desirability" also becomes the impact summary with regard to the proposed activity. The Impact summary will be included in the BAR. These Guidelines state that: "In considering the impact summary it must be remembered that ultimately the aim of EIA is to identify, predict and evaluate the actual and potential risks for and impacts on the geographical, physical, biological, social, economic and cultural aspects of the environment, in order to find the alternatives and options that best avoid negative impacts altogether, or where negative impacts cannot be avoided, to minimise and manage negative impacts to acceptable levels, while optimising positive impacts, to ensure that ecological sustainable development and justifiable social and economic development outcomes are achieved".

The principles of Integrated Environmental Management (EIM) as set out in Section 23 of NEMA have been considered in this environmental assessment as explained below.

- Environmental management placing people and their needs at forefront of its concern, and serve their physical, physiological, developmental, cultural and social interests equitably – This process is being undertaken in a transparent manner and all effort is being made to involve all the relevant stakeholders and interested and affected parties. I.e., Public participation is being undertaken to obtain the issues / concerns / comments of the affected people for input into the process. Refer to Section 8 in this report.
- Socially, environmentally and economically sustainable development – All aspects of the receiving environment and how this will be impacted have been considered and investigated to ensure a minimum detrimental impact to the environment. Where the impact could not be avoided, suitable and effective mitigation measures have been proposed to ensure that the impact is mitigated, and these are included in the EMPr.
- Consideration for ecosystem disturbance and loss of biodiversity – the project site is identified as a critical biodiversity area 2 (CBA 2) (refer Figure 10). The vegetation type found on site is not listed in the "National List of Threatened Ecosystems that are Threatened and in Need of Protection" in GN 1002 dated 9/12/2011.

Ecosystem disturbance and loss of biodiversity are considered in the impact assessment. Rehabilitation back to the natural state is a key component, and will be undertaken in a phased manner as the mining activities progress. This report together with the EMPr (Part B) and Closure Plan (Annexure 1) proposes mitigation measures which will minimise the impacts of the mining activities on the environment.

- Pollution and environmental degradation – The implementation of recommendations made and proposed mitigations are detailed in the EMPr, and Closure Plan (Annexure 1) to ensure minimum environmental degradation.
- Landscape disturbance – All aspects of the receiving environment and how this will be impacted have been considered and investigated to ensure a minimum detrimental impact to the environment. Where the impact could not be avoided, suitable and effective mitigation measures have been detailed in the EMPr and Closure Plan (Annexure 1) to ensure that the impacts are mitigated.

- Waste avoidance, minimisation and recycling – These aspects were considered and incorporated into the EMPr and the Closure Plan (Annexure 1).
- Responsible and equitable use of non-renewable resources – These aspects have been considered and there is not much scope to reduce the use of non-renewable resources, such as vehicle transport.
- Avoidance, minimisation and remedying of environmental impacts - All aspects of the receiving environment and how this will be impacted have been considered and investigated to ensure a minimum detrimental impact to the environment. Where the impact could not be avoided, suitable and effective mitigation measures will be proposed to ensure that the impact is mitigated. A number of mitigation measures have been included in the EMPr and the Closure Plan (Annexure 1).
- Interests, needs and values of Interested and Affected Parties – This process has been undertaken in a transparent manner and all effort is being made to involve all the relevant stakeholders and interested and affected parties (I&APs). Comments received from I&APs on the Draft Basic Assessment Report to be included as part of the Final Basic Assessment Report are summarised in Section 8.
- Access of information – Potential Interested and Affected Parties were notified of the proposal and the availability of the DBAR. They were also notified of having the opportunity to register as an I&AP and registered I&APs have been kept informed of the commencement of the Basic Assessment process.
- Promotion of community well-being and empowerment – This process is being undertaken in a transparent manner and all effort is being made to involve all the relevant stakeholders and registered I&APs.

Potential impacts on the biophysical environment and socio-economic conditions have been assessed, and steps have been taken to mitigate negative impacts, and enhance positive impacts. Adequate and appropriate opportunity is being provided for public participation. Environmental attributes have been considered based on the available information, and environmental management practices have been identified and established to ensure that the proposed activities will proceed in accordance with the principles of IEM.

7 Motivation for the overall preferred site, activities and technology alternative

The preferred and only location of the quarry, overburden dump site, and the dispatch yard, infrastructure, site camp and laydown area are as per the demarcated areas shown in Figure 3.

The preferred and only activity is the mining of industrial minerals for the industrial and infrastructure development market already established. The preferred and only technology will entail blasting using explosives in order to loosen the hard rock from the existing quarry on the property. The loosened hard rock will be crushed and screened using a mobile crusher whereafter it will be transported to be stockpiled until sold.

There are therefore no other reasonable or feasible sites, layouts, activities, technologies, or operational alternatives for further consideration in the impact assessment component, other than the mandatory "no-go" alternative that must be assessed for comparison purposes as the environmental baseline.

In addition to the above, two important aspects that the applicant took into consideration in identifying the proposed footprint area are the fact that the area has been previously disturbed by mining activities and the existing quarry was abandoned

without proper rehabilitation thereof.

Therefore, in addition to the aforesaid benefits, the proposed activity will ensure that:

- Mining activities take place on an area previously disturbed by mining activities; The clearance of vegetation will be reduced as a large portion of the footprint area has been disturbed;
- The un-rehabilitated quarry (which is a safety hazard at present) will be properly rehabilitated upon cessation of mining activities in compliance with the relevant legislation and departmental requirements.

8 Process to Reach the Proposed Preferred Alternative

8.1 Details of the development footprint alternatives considered.

With reference to the site plans provided as Figure 1, 2 and 3 showing the location of the individual activities on site, details are provided below of the alternatives considered.

8.1.1 Location or Site Alternatives

The design or layout of the mining area is determined by the shape, position and orientation of the outcrop partially mined in the past. Most of the logistics to be used during mining is already available at the nearby business hubs. Satellite infrastructure and waste management facilities at the mine will consist of mobile containers. Existing farm tracks will be used and upgrading of the tracks will be undertaken as part of the construction phase, and maintenance as part of the operational phase.

No electricity is available on the mine and all electricity will be generated by mobile diesel-powered generators. No process water is required in the mining process and potable water will be obtained from the local authority.

8.1.2 Type of Activity

The Applicant is not the land owner, so it would not be realistic for this company to propose another type of activity, as their core business is mining.

The holder of a mining permit is required to rehabilitate the environment affected by mining to its natural state or to another predetermined land use. Although the mining activity takes place over a long-time period, the best post-mining land use alternative is to return the site to its natural state taking into account the altered topography due to mining. Other activity alternatives have therefore not been considered as the purpose of the proposed project is to mine industrial minerals from the identified deposits with the application area. The only other activity required to be assessed in terms of NEMA is the "do-nothing" alternative, as detailed further below.

8.1.3 Design or Layout of Activity

The design or layout of a mining project is determined by the shape, position and orientation of the mineral resource exposed by historic mining. Best practice dictates that it is better to mine the outcrop in mine blocks as this will reduce the impact on topography. The significance of the environmental impacts associated with different possible design or layout alternatives would be very similar.

8.1.4 Technology Alternatives

The ore body occurs in a surface outcrop and the mining method adopted is the opencast one mining into the outcrop employing surface drilling and blasting. Mining will continue from the historic mine face as the ore body outcropped at surface level. A simple mining method will be employed entailing development of the outcrop in

terraces from top to bottom. The broken rock will be crushed and screened in the pit. The crushed product will be moved to the stockpile area where it will be sold as a FoT product. There are no reasonable or feasible technology alternatives for further consideration.

8.1.5 Operational alternatives

The Mining Work Plan sets out the operational plan for the mine based on the local demand. There are no reasonable or feasible operational alternatives for further consideration.

8.1.6 The No-go Alternative

The assessment of alternatives must at all times include the "no-go" option as a baseline against which all other alternatives must be measured. The "no go" alternative is therefore assessed together with the preferred alternative.

The no-go alternative entails no change to the status quo and is therefore a real alternative that needs to be considered.

The no-go alternative was not deemed to be the preferred alternative as it will mean that there will be no supply of minerals for the international market. There will be no employment opportunities, and no beneficiation for the local community. The existing un-rehabilitated quarry will remain.

The project site has been selected based on the presence of an historic mine. The layout and technology of the quarry has been determined by the shape, position and orientation of the mineral resource.

The operational approach is practical and based on best practice to ensure a phased mining, followed by rehabilitation in sequential stages.

8.2 Details of the Public Participation Process Followed

The public participation process has been conducted according to the requirements as prescribed in Regulations 40 to 44 of the EIA Regulations, 2014 (as amended).

The formal public participation process, which meets the requirements of the NEMA EIA Regulations and the MPRDA has been followed and include the following activities: (Refer Annexure 2 Public Participation Process **to be included as part of the Final BAR**).

Potential I&APs were notified about the project and of commencement of the Basic Assessment (BA) process and invited to registration as stakeholders by means of:

- Letters of notification to directly affected landowners;
- Written notifications to other stakeholders including neighbours, Local and District Municipalities (including traditional authorities where applicable); and
- Media advertisements and site notices.
- Circulation of a Background Information Document (BID) with the notification letter to the landowner, neighbouring landowners and potential I&APs;
- Registered I&APs including the Relevant Government Department were given the opportunity to review and comment on the Draft Basic Assessment Report.
- Registered I&APs will be notified of the outcome of the environmental authorisation, and if required the appeal process to be followed.

8.3 Summary of issues raised by I&As

(To be included in the FBAR after the 30-day PPP period)

Interested and Affected Parties, persons consulted is marked with an X	Date Received	Comments	Issues raised	EAPs response to issues as mandated by the applicant	Reference in this report where the issues and or response were incorporated.
ORGANS OF STATE					
Landowners or Lawful occupier/s of the land					
Landowners or lawful occupiers on adjacent properties					
Municipality					
Communities					
Traditional Leaders					
None identified	NA				
Interested parties - Reply on advertisement and site notices					

8.4 The Environmental attributes associated with the project site

8.4.1 Type of Environment Affected by the Proposed Activity

Regional setting

The project site is located in the Succulent Karoo Biome. The Succulent Karoo Biome is found mostly west of the western escarpment from the Luderitz District of Namibia through the western belt of the Northern Cape and Western Cape Provinces, and inland of the Fynbos Biome to the Little Karoo. The biome covers approximately 111 000 km, making it the fourth largest biome in southern Africa after the Savanna, Nama-Karoo and Grassland Biomes. Much of the terrain is flat to gently undulating, such as the western coastal platform, Knersvlakte and Tanqua Karoo. Hilly and more rugged topography occurs in Namaqualand, the Robertson Karoo and Little Karoo and parts of the western escarpment. The extreme altitudinal range is from sea level to about 1 500 m, but most of the area lies below 800 m.

Landscape and Land Use

Approximately 90% of NDM is used for livestock grazing and production, with the remainder comprising of mining, agriculture and urban development. The main crops currently grown in the NDM include Lucerne, oats, wheat and rooibos. Approximately 10% of the crops are planted near rivers for chance/accidental irrigation. The other approximately 90% are dry land crops, which are being planted in high rainfall areas with approximately 600mm/year.

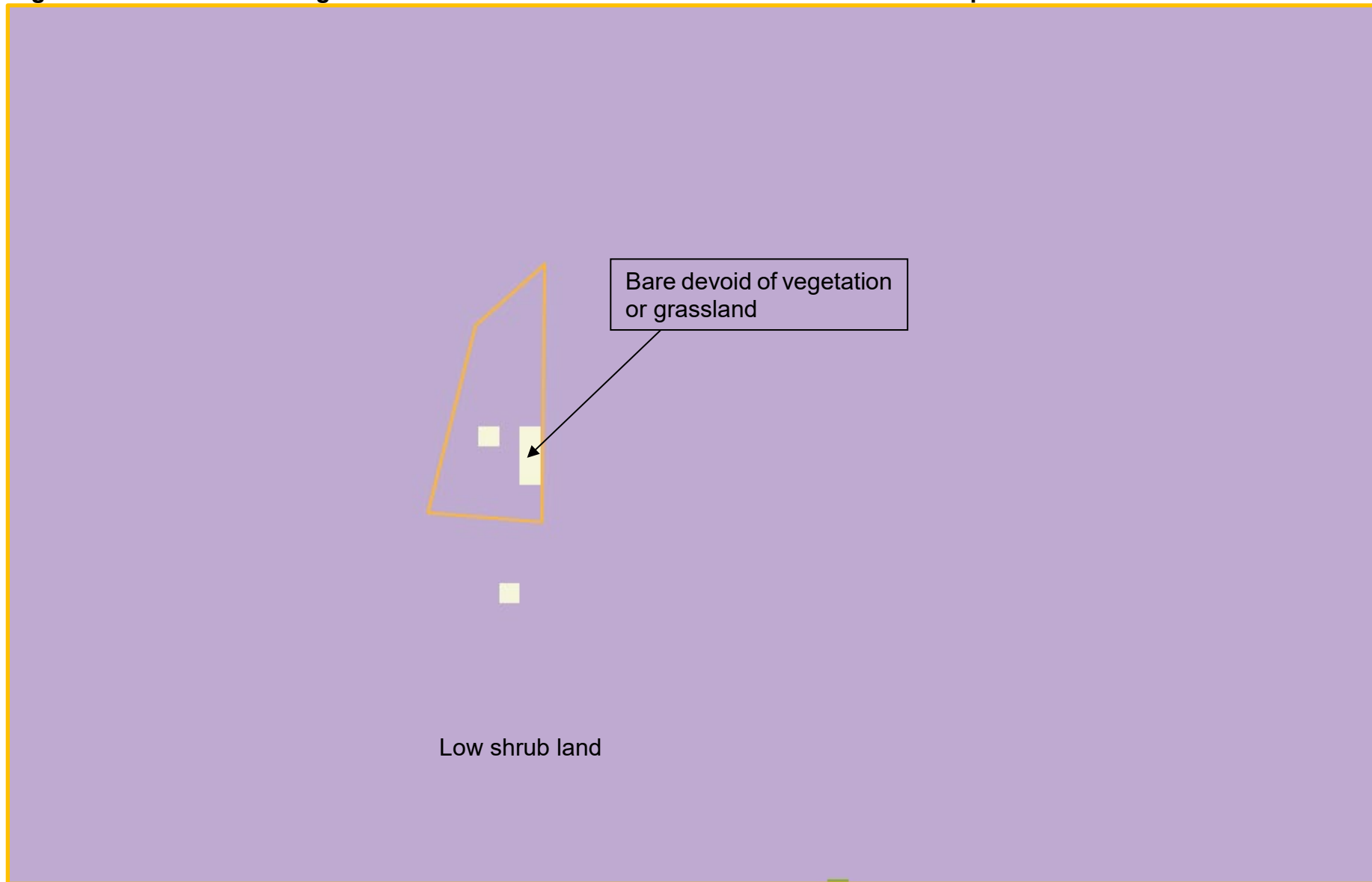
Tourism is a seasonal feature – with visitors to the region arriving almost exclusively between July and October in order to take in the world-renowned yearly flower display. Urban development is not a major feature of the landscape and is not expected to increase much in the coming years. As such the proposed mining activities will not have an impact on agricultural land or agricultural production.

Land use involves mostly cultivated drylands and mining (diamonds, copper, base-metals, granite, sandstone and gypsum), as well as salt pans. Future pressures on biodiversity are likely to come from:

- renewable energy (solar and wind farms)
- new mining development
- unsustainable use of natural resources, (especially due to overgrazing), and
- expansion of crop agriculture
- to a certain extent urban development

Note that current land cover indicators do not take into account degradation due to, for example, spread of alien plants, secondary impacts of mining (e.g., sand mobilization) or overgrazing by livestock. Refer to Figure 6 which shows the land-use as per the SANBI BGIS map viewer Land Cover database dated 2014. The red areas are either eroded areas or areas devoid of vegetation due to mining activities. The light purple indicates low shrub land.

Figure 6: Location of Mining area in terms of Land Cover sourced off SANB BGIS Map Viewer



Geology and soils

The area is dominated by silts and loamy sands of partly aeolian origin above migmatite and gneiss of the Namaqualand Metamorphic Complex (Precambrian age). In some areas deep red loamy soils on granites and gneisses of Mokolian age (most significantly the Kamieskroon Gneiss and Gladkop Suite).

Sediments of the Namaqualand coastal area overlie the Precambrian Metamorphic Basement Complex, which consists predominantly of granite-gneiss, sparsely interspersed with minor mafic intrusives, and often intersected by quartzite ridges, marble layers and a wide variety of schists (De Villiers & Sohngé, 1959).

Ae land type is dominant, followed by Ag land type. Refer figure 7 for regional geology.

Climate

Winter-rainfall climate with irregular rain events occurring mostly from May to August and almost always no rain between November and February. MAP is estimated at 80-140 mm, with winter rainfall clearly predominant. Dew is experienced throughout the winter. MAT is quite high (17.8°C) and frosts hardly occur. In the coldest months of the year (May to August) temperatures below 10°C are often recorded. The highest temperatures are reached from December to January (may well exceed 30°C).

See also climate diagram Figure 8

The CSIR created a detailed new Köppen-Geiger map to quantify the current climatic conditions as accurately as possible in South Africa. This classification uses a concatenation of a maximum of three alphabetic characters that describe the main climatic category, amount of precipitation and temperature characteristics. The mining area is located in the climatic category BWh (Arid, Desert, Hot arid) (Figure 9).

Figure 7: Average monthly rainfall

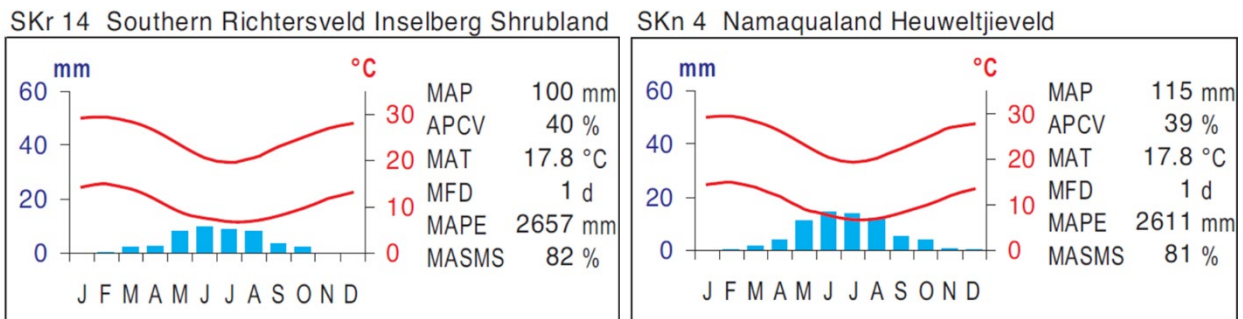


Figure 8: Geology of Mining area

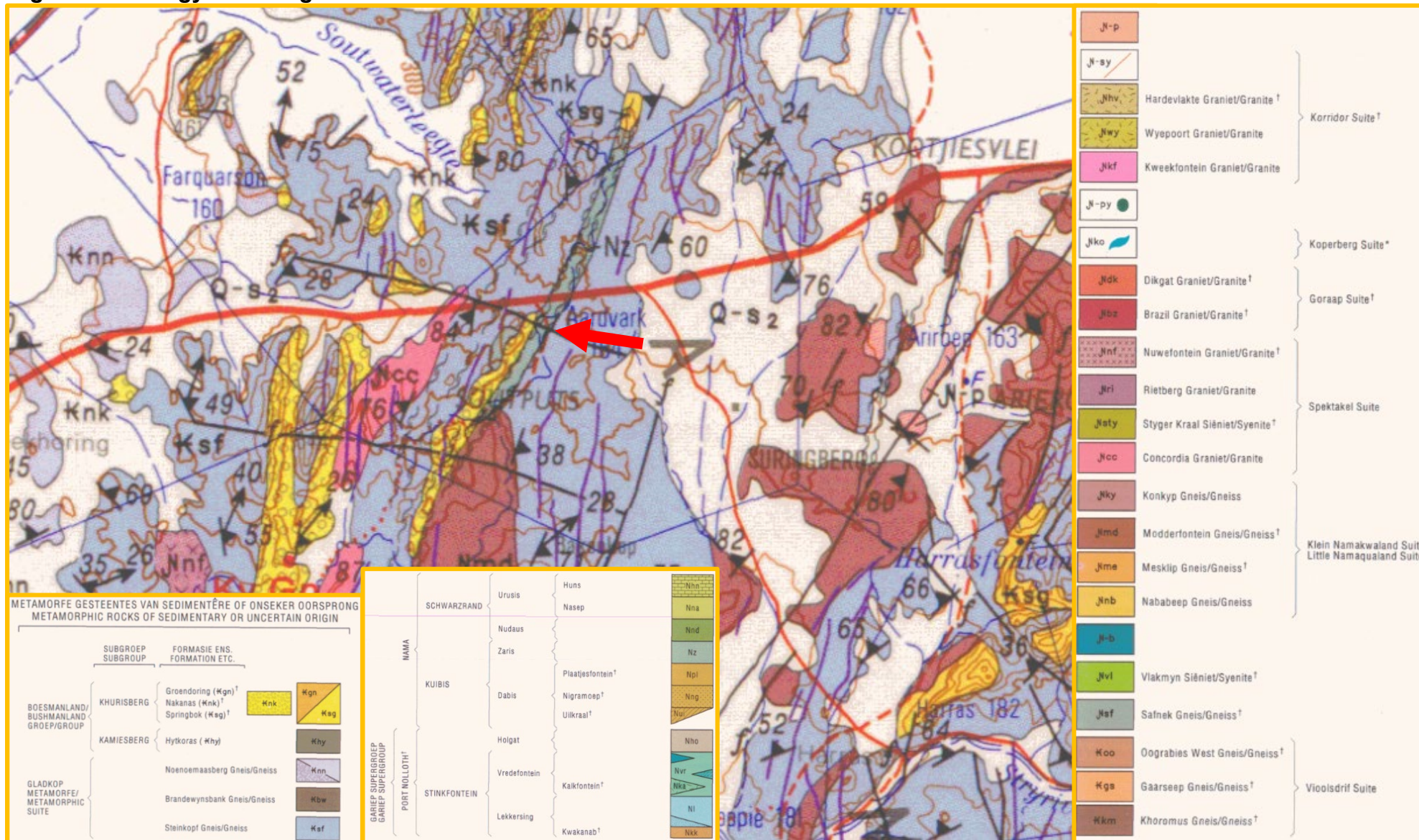
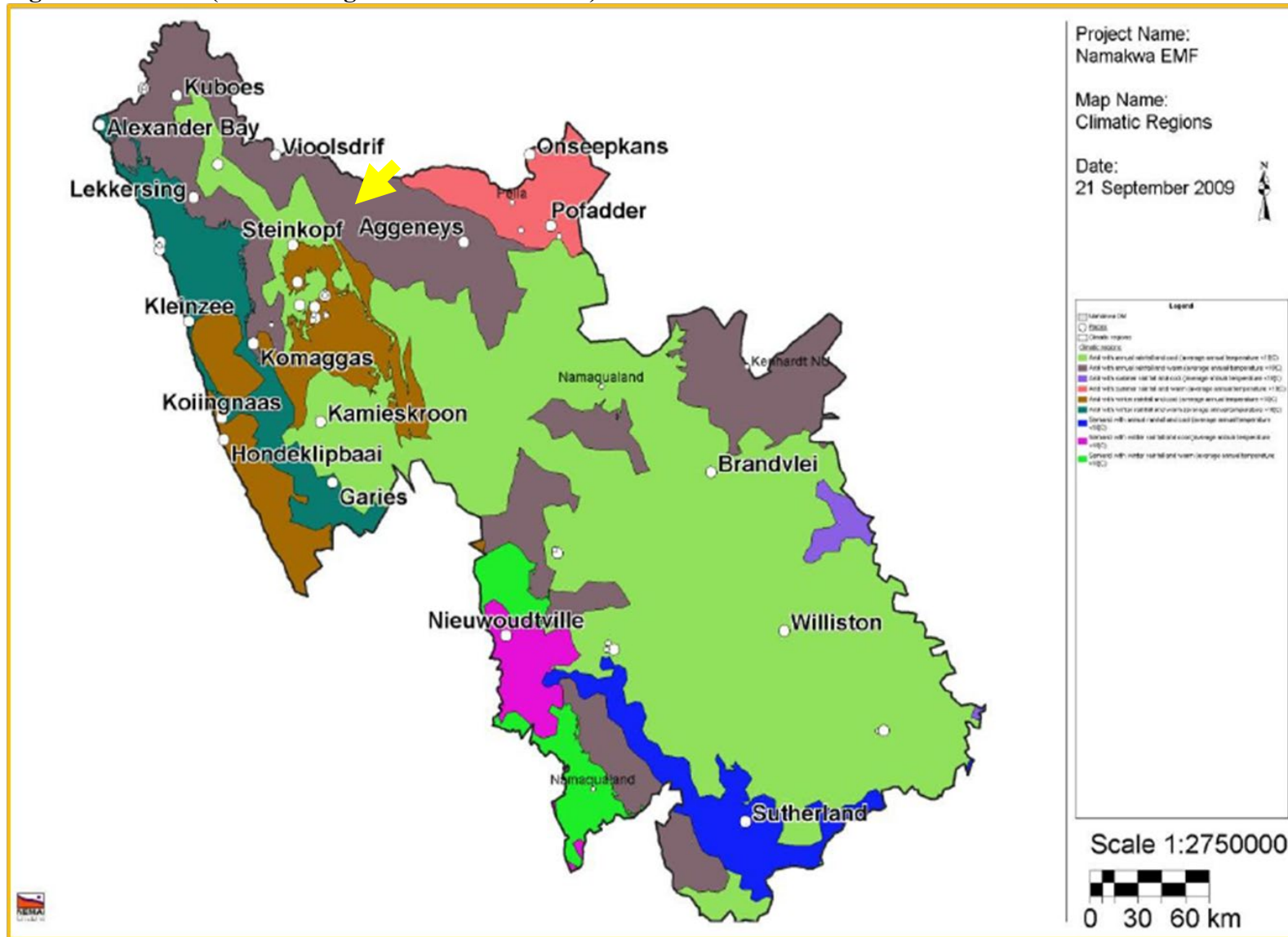


Figure 9: Climate (Climatic regions within the NDM)



Biodiversity (Flora and Fauna)

The mining area is located in the Succulent Karoo Biome and dominated by the Southern Richtersveld Inselberg Shrubland (SKr 14) and Namaqualand Heuweltjieveld (SKn 4) vegetation units (**Refer Figure 10**).

The conservation status of the units according to Driver et al. 2005 and Mucina et al. 2006 is as follow:

- **Succulent Karoo Biome – Namaqualand Bioregion**

- **Namaqualand Heuweltjieveld SKn 4**

Distribution

At the western foothills of the Namaqualand Escarpment from west of Steinkopf southwards to Soebatsfontein and to Kotzesrust. Altitude ranging from 100-540 m (most of the area).

Vegetation & Landscape Features

Undulating plains leading up to the Escarpment with a mosaic of communities on heuweltjies

Conservation

Not under immediate threat except for local intensive grazing pressure responsible for veld degradation. Target 28%. Some 11 % of the area of the unit statutorily conserved in Namaqua National Park. Scattered *Acacia cyclops* can be seen as an infestation problem on about 5% of the area in this unit. About 3-4% of the area is transformed by cultivation. Erosion remains at very low to low levels.

- **Succulent Karoo Biome – Richtersveld Bioregion**

- **Southern Richtersveld Inselberg Shrubland (SKr 14)**

Distribution

Southern Richtersveld—inselbergs scattered over the plains between Anenous Pass and Port Nolloth, partly surrounded by patches of SKr 13 Southern Richtersveld Scorpionstailveld. Includes Klaarkop, Kabies se Berg, Rooidam se Koppe, Steenbok se Berge and Beesvlei se Berg (but excludes the unique Vyftienmyl se Berge inselbergs). Altitude varies from about 100-600 m.

Vegetation & Landscape Features

The inselbergs differ markedly in size, altitude, steepness, rockiness and spatial aggregation. Habitats vary depending on exposure, altitude and soil type. Smaller inselbergs are considerably more arid than higher ones, with lower parts covered by sparse chamaephyte vegetation, often dominated by the nanophanerophyte *Zygophyllum prismatocarpum*. At higher altitudes, especially on southwest-facing slopes, dense vegetation of dwarf leaf-succulents and lichens occurs.

Conservation

Least threatened but in reality, susceptible. Target 28%. None conserved in statutory conservation areas. Evidence of overgrazing and trampling leading to erosion and to disturbance of topsoil occurs. High cover of *Lebeckia multiflora* and *Euphorbia ephedroides* in many parts of this unit might be indicative of a shift towards a higher proportion of weeds, when heavily grazed.

The area surrounding the mining area is classified as a Critical Biodiversity Area 1 and 2 (CBA 1 and 2) but the mining area itself has been transformed (**Refer Figure 11**). No protected areas are located within a 5Km radius of the mining area.

Figure 10: Vegetation

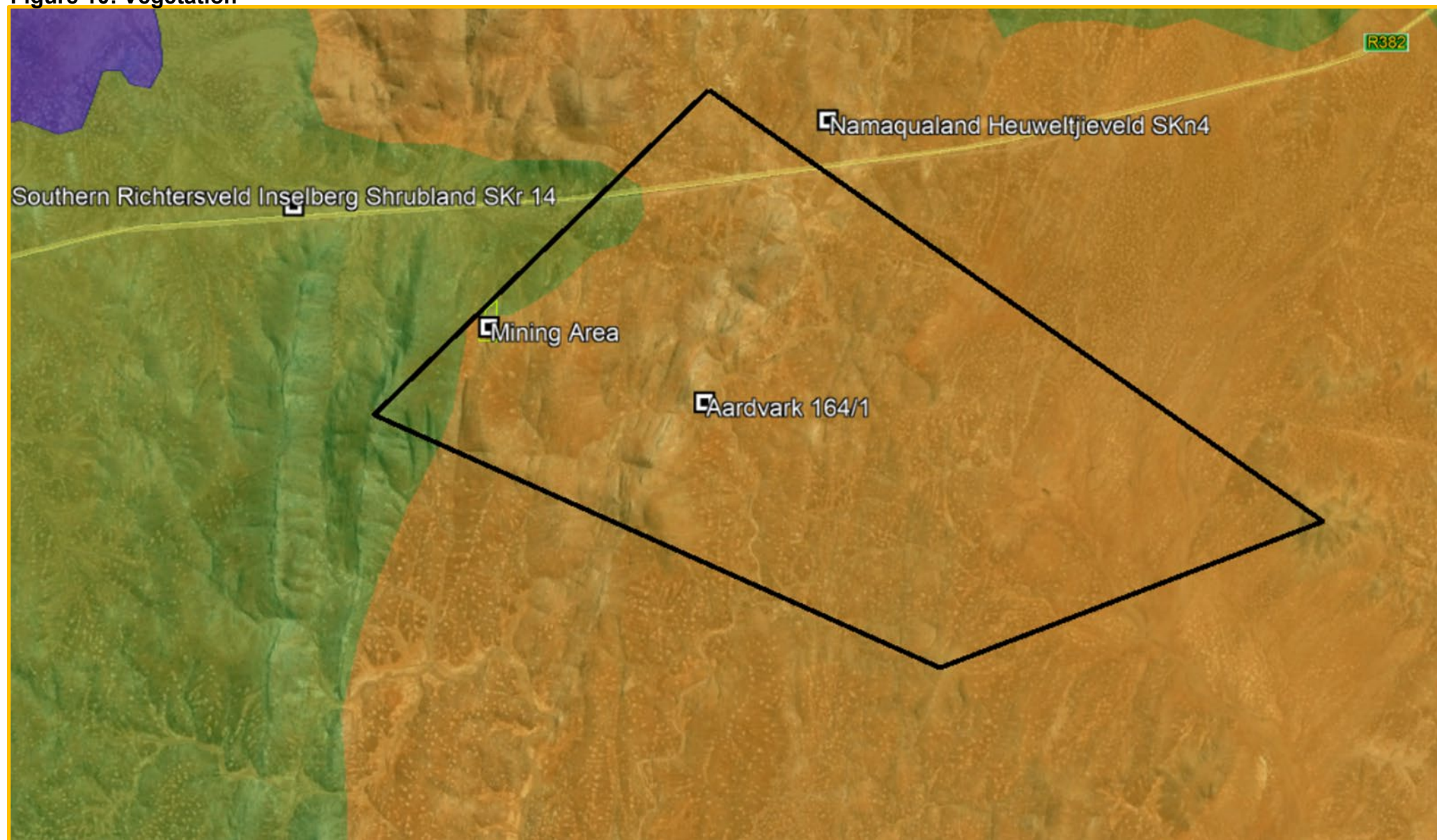
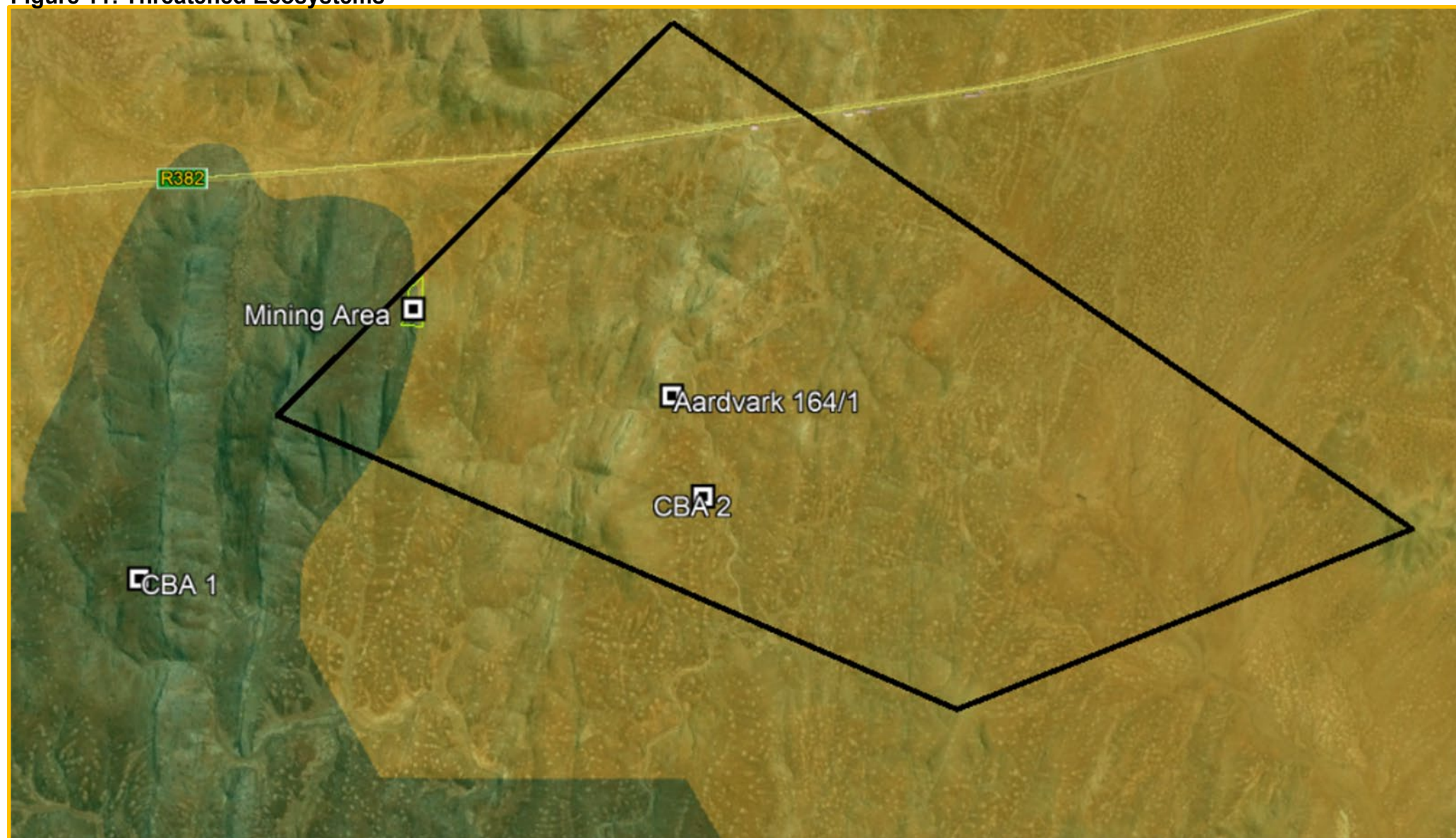


Figure 11: Threatened Ecosystems



Water Resources

The property is located within the Department of Water & Sanitation's Lower Orange Water Management Area (14) and quaternary drainage area F30G.

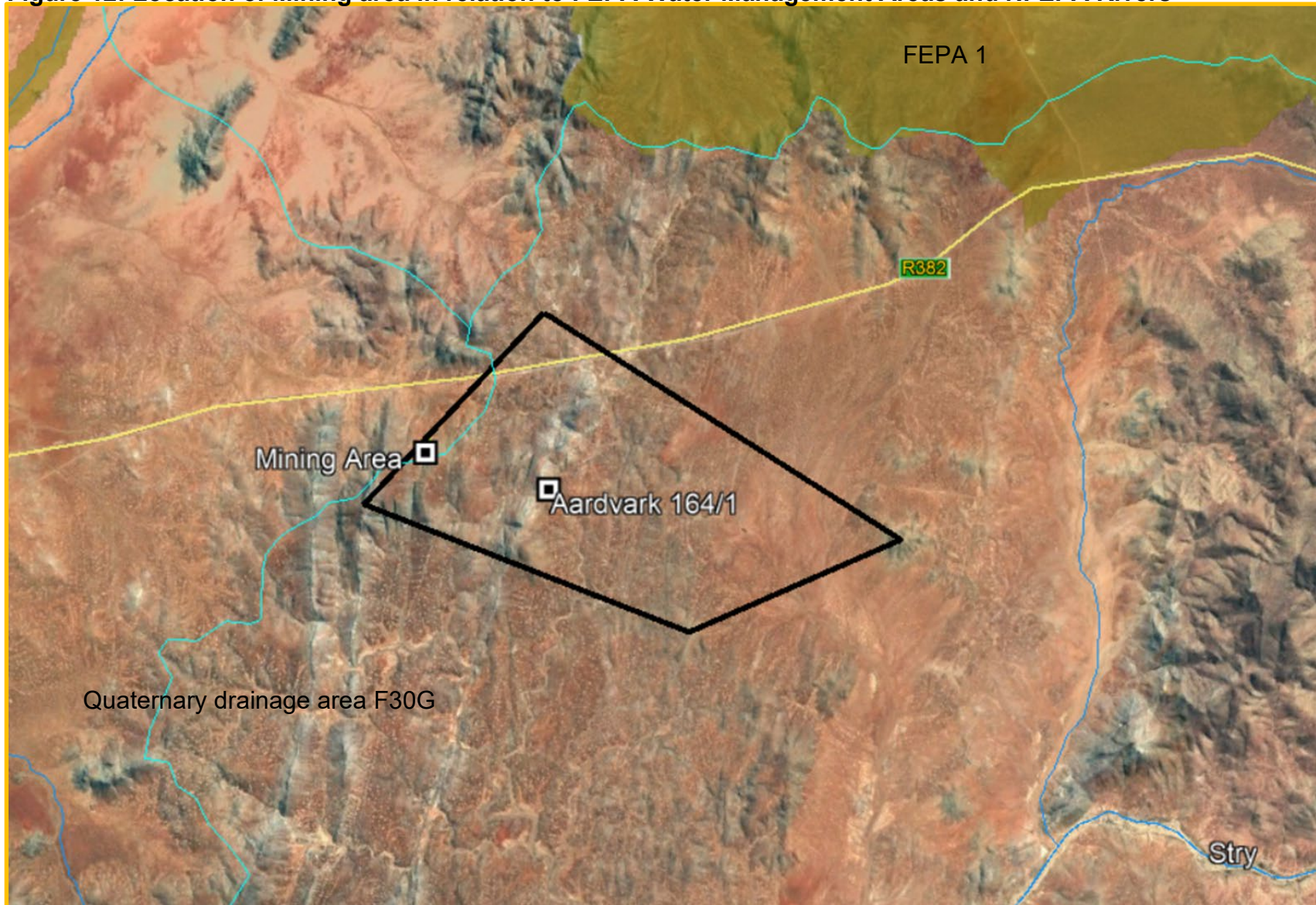
Within the quaternary drainage area, the Stry River to the east of the mining area is classified as National Freshwater Ecosystems Priority Areas (NFEPA) – River. A large portion of this quaternary drainage area outside the mining area has been identified as a Freshwater Ecosystem Priority Area (Code 1 FEPA) (Refer Figure 12). No Strategic Water Source Area and wetlands are present within the mining area.

Because of the limited thickness of the alluvial cover and the hard rock nature of all other rocks in the area, no regional-scale aquifers transmitting water over large scales have developed in the Namaqualand Metamorphic Complex (Vegter, 2006). Primary weathered zone aquifers are rare and localised because soils are thinly developed. Groundwater occurs mainly in secondary fractured-rock aquifers. Groundwater tends to be concentrated preferentially along fractures within hydraulically isolated rocks of low permeability, which dominate the surrounding plains (DWAF, 1996).

Surface water only accumulates in the drainage channels after exceptionally good rains. The Mean Annual Run-off (MAR) is in any event very low given the very low rainfall (MAP 80-140 mm), 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.

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.

Figure 12: Location of Mining area in relation to FEPA Water Management Areas and NFEPA Rivers



Emissions

Air Quality

Dust is generated by wind over un-vegetated or denuded areas and given the surrounding extent of semi-desert dust generation is high under windy conditions (dust storm). Dust is generated off un-surfaced roadways on site, and during the mining operations. Mining activities will take place in a very remote area and dust generation will be limited to a small radius around the operation.

Noise

Farm traffic-generated noise occurs in the area and such noise levels are low (observed estimate at ± 55 dBA).

Noise from earth moving equipment and machinery associated with the mining operation on the adjacent mine will be within the norm and due to the remote locality of the operation will have no impact.

Socio-economic

The project site falls within the Namakwa District Municipality. The socio-economic profiles are referenced from the IDPs and included below.

The Namakwa District Municipality is sparsely populated, with a population of 115 842 and is the least populated district in the Northern Cape Province (and Country, although geographically the largest) with a population comprising 10.11% of the province's total population.

- The average growth rate for GGP in the area from 1996-2011 was 5.4 % and in 2007-2011 this slowed down slightly to an average growth rate of 4.8%.
- The largest contributing sector to employment in the local economy (21.12% of total employment in the formal sector) is the retail, catering and accommodation sectors.

Nama Khoi had the largest number of people employed, unemployed, economically active and not economically active in 2004 and 2014. In 2014 Nama Khoi made the largest contribution to employment in the following industries: mining (65.6%), manufacturing (42.6%), electricity (45.7%), trade (42.0%), transport (46.0%), finance (35.4%), community services (37.9%) and households (35.3%). This municipality also employed the largest proportion of people in the district, accounting for 38.2 per cent of the people in formal employment.

Cultural, Heritage and Palaeontological Resources

An Archaeological/Heritage Impact Assessment (HIA) was prepared by ASHA Consulting (attached as Appendix 3) and submitted to the South African Heritage Resources Agency (SAHRA) for comment. According to the report the overall, heritage impacts will be minimal and there are no areas that require avoidance or mitigation.

It is recommended that the project be allowed to proceed but subject to the following recommendation:

- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

8.4.2 Current land uses

There are existing mining sites in the project site, as detailed in Section 3 above. There is also extensive livestock community farming in the area.

8.4.3 Environmental features and infrastructure on the site

Figure 5 to 11 and the corresponding paragraphs provide a description of the environmental features on site.

8.4.4 Environmental and current land use maps

Refer to Figure 5 to 12 provided as part of the specific attributes

8.5 Impacts and risks identified

The potential risks arising from the mining operation are generic for opencast mine and are listed below.

8.5.1 Potential Risks with regard to excavations (safety)

- Open Pit mining operations commonly have a permanent impact on rock masses that influences the topography on the site and can impact post-mining slope stability. As the ore body is traced deeper and deeper into the ground a series of benches for both access and safety needs to be used. Sometimes rock surrounding the ore has to be removed so that the sides of the pit do not become dangerously steep. The opportunities for land use following open-pit mining are limited, because it is very expensive to fill the pit. The main objective is usually to make the pit high walls safe and to landscape the overburden and waste rock dumps.
- Collapsing slope(s) of mine pit can be detrimental to the safety and health of humans and animals.
- Potentially dangerous areas like deep mine pit or equipment left behind and uncontrolled access to a potentially unsafe post-mining area.
- Post mining topography not compatible with original landform.
- Unsafe erosion gullies.

8.5.2 Potential risk of residual environmental impact (waste)

- Post mining landscape that increases the requirement for long term monitoring and management.
- Unwanted ruins, buildings, foundations, footings and waste management practices creating or leaving legacies.
- Sub-surface infrastructure remaining behind, limiting the intended post closure land use including footings and foundations and power supply and water installations including pumps and pipelines.
- Equipment and other items used during the mining operation left behind.
- Incomplete removal of re-usable infrastructure.
- Rubble from demolished infrastructure left behind.
- Waste classes not kept in separate streams and incomplete removal of waste.
- Stockpiles and leftover product left behind.
- Increased erosion, dust generation and potential chemical contaminants reduce surface water quality or result in discharge that exceeds the maximum concentrations permitted.
- Vehicle wash bays and workshop facilities produce petrochemical and solvent contaminated runoff.

- Sanitary conveniences, fuel depots or storage facilities of potentially polluting substances can contaminate surface water.
- Oil fuel leaks onto virgin soil through the earthmoving and transport equipment and machinery or spillage of fuel during transfer from fuel bowser to equipment in the field.
- Drainage of benches and concentration of rainfall leads to creation of large volume open water bodies in worked out pit and can lead to increased groundwater recharge and potential regional impact of low-quality water.

8.5.3 Potential impacts and risks associated with economically viable and sustainable land

With open pit mines complete disruption of the surface always occurs, which affects the soil, fauna, flora and surface water, thereby influencing all types of land use. Opencast mining and related infrastructure are a permanent destruction and rehabilitation cannot restore all pre-mining habitats. Mine pits cannot be completely refilled and form permanent depressions that must be accommodated through imaginative utilisation during the post-closure period and the residual impact of open-pit mining is usually a completely different land use.

Risks associated with economically viable and sustainable land include:

- Uncontrolled expansion of mining footprint by not restricting the area disturbed by mining and the associated activities/infrastructure, resulting in loss of land with agricultural potential. Uncontrolled development of roads where existing farm roads is not used for mining operations and redundant internal roads are left behind. Dual used roads still needed by the landowner and fences not maintained or repaired.
- Post mining landform not compatible with the surrounding landscape and not capable of a productive land use that achieves a land capability equal to that of pre-mining conditions.
- Long term changes in land use caused by not implementing prompt rehabilitation and maintenance of disturbances when possible as part of annual rehabilitation plan.
- Unsuccessful rehabilitation can reduce the post-mining land use options.
- Rehabilitated areas could be too unstable to support post-mining land use objectives compatible with surrounding areas.
- Disturbance of agricultural potential and subdivision of high potential arable land into uneconomic farming units. Inadequate planning or loose development can subdivide high potential land or habitats into un-viable small areas.
- Disturbance of ecology due to loss of habitat and cumulative impact of illegal collecting during long-term or life of mine can degrade areas and reduce the viability of adjacent areas.
- Inadequate control of alien species can result in establishment of populations or seed sources that threaten adjacent areas.

8.5.4 Potential Risks with regard to stable, free draining post mining landform

Opencast pit mining creates an area of lowered topography that can act as a sump for storm water runoff and can intersect groundwater and if the operation extends to depths below the water table, it will affect the near-surface groundwater. Apart from reducing natural recharge to the shallow and deep groundwater zones, the increased runoff and altered storm hydrograph will also impact areas downstream or downslope where the flow is concentrated.

- Impact on surface water through modification of infiltration rates by increasing the extent of hardened surfaces.
- Inadequate topsoil restoration or creation of unnatural surface topography or slope form which could impact lower or adjacent slopes due to increased runoff velocity.
- Altered storm water runoff response due to large impervious areas and concentrated runoff in drainage systems. Concentrated storm runoff from the pit surrounds and infrastructure areas is erosive, causing sheet, rill and donga erosion features.

8.5.5 Potential Risks with regard to benefits for the social environment

- A lack of a positive and transparent relationship with stakeholders and a lack of maintaining communication channels, such as not providing stakeholders including government authorities with relevant information as per legislative requirements.
- Not undertaking environmental management according to approved EMP and plans and no auditing of the environmental management system.
- Disturbance to sensitive environments such as land with historical or conservation value, urban areas, wetlands or rivers, high potential agricultural land, transport infrastructure, power transmission lines. Slow continuous damage to habitat, such as wood collection, are typical impacts on adjacent areas.
- Staff losing their jobs due to mine closure can have devastating effects on communities that are reliant on mine-based income as does job losses in secondary industries, businesses and contractors. There can also be issues with contractual agreements with service providers surpassing the mine closure date.
- Closure standards not accepted and/or are changing. Mine closure being jeopardised by other land uses.
- Poorly defined transition from mining to farming activities within different legislation.
- Mine closure stalled due to non-compliance with South African legislation (national, provincial and local). Insufficient funds for completion of rehabilitation.

8.5.6 Potential Risks with regard to aesthetic impact

Terrain morphology plays a critical role in defining the visual envelope of mining developments and can either reduce or enhance visual impact. Apart from visual intrusion there is also the risk of reduced sense of place. The visual intrusion impact of mining activity would be on nearby roads, homesteads, settlements and tourist sites.

- Visual disturbance from the public road views - excavations or overburden dumps blocking the view. Large buildings, colour contrast of disturbed areas against adjacent veld or dust emission plumes. Nuisance effects of air emissions (dust) no implementation and maintenance of dust monitoring programs accompanied by dust suppression activities if required.
- Accumulation of spoils from breaking rock (fines) can expose highly erodible fine sediment to wind transport and lead to dust generation and dispersal. Dust can retard vegetation growth and reduce the palatability of vegetation.
- Dust generated on haul roads reduces visibility in opencast pit, representing a safety hazard.
- The cumulative effect of a raise in the ambient noise levels or high noise levels

in specific areas that exceed specified levels. Noise disturbance and light pollution as a result of night activities.

8.5.7 Potential Risks with regard to archaeological sites, cultural heritage sites or graves

- Disturbance of archaeological sites and not implementing mitigating measures according to the archeological assessment.
- Progressive development can encroach upon or disturb archaeological sites, cultural heritage sites or graves.

8.5.8 Potential Impacts and Risks associated with the No-Go Alternative

- There would be no change to the biophysical environment with the No-Go Alternative. The biophysical environment is currently in various stages of mining.
- The No-Go Alternative implies that the Applicant would forgo an opportunity to provide employment and the generation of an income from this project, with positive socio-economic spin-offs for the local community.

Potential Impacts and Risks associated with the Preferred Alternative

Phase	Activities - Risk source	Potential Impacts	Reversible	Irreplaceable Damage	Can impact be avoided
CONSTRUCTION PHASE	Site Access and Establishment Access and Haul Roads Services and associated infrastructure Surface disturbance Waste management facilities Oil/grease/diesel management	Compaction and soil disturbance due to driving off-road and topsoil stockpiling	Yes	No	No
		Dust falls and nuisance from activities, dust emission from top soil stripping and vehicles using existing access and haul roads.	Yes	No	Yes
		Soil and groundwater contamination from hydrocarbons	No	Yes	Yes
		Vehicle wash bays and workshop facilities produce petrochemical and solvent contaminated runoff.	No	Yes	Yes
		Sanitary conveniences, fuel depots or storage facilities of potentially polluting substances can contaminate surface water.	No	Yes	Yes
		Disturbance of biodiversity - Wildlife and vegetation due to site preparation	Yes	No	No
		Visual intrusion - Unwanted ruins, buildings, foundations, footings and waste management practices creating or leaving legacies	Yes	Yes	Yes
		Emissions: Dust, Noise Generation from vehicles that also emit Greenhouse Gases.	Yes	No	No
		Impact on heritage artefacts, heritage sites or grave yards	No	Yes	Yes
		Socio- economic impact on existing land use practices Sub-surface infrastructure remaining behind, limiting the intended post closure land use including footings and foundations and power supply and water installations including pumps and pipelines.	Yes	No	Yes
OPERATIONAL PHASE	Open cast mining and spoils Opencast workings and excavations (including final voids and ramps) Product stockpiles overburden and spoils	Collapsing slope(s) of high walls can be detrimental to the safety and health of humans and animals.	No	Yes	Yes
		Potentially dangerous areas like high walls or equipment left behind and uncontrolled access to a potentially unsafe post-mining area	Yes	No	Yes
		Removal of ore change the topography and post mining topography not compatible with original landform.	No	Yes	No
		Unsafe erosion gulley's and erosion control or runoff diversion structures led to soil compaction	Yes	No	Yes
		Oil fuel leaks onto virgin soil through the earthmoving and transport equipment and machinery or spillage of fuel during transfer from fuel bowser to equipment in the field.	No	Yes	Yes
		Drainage of benches and concentration of rainfall leads to creation of large volume open water bodies in worked out pit and can lead to increased groundwater recharge and potential regional impact of low-quality water.	No	Yes	Yes

OPERATIONAL PHASE	Open cast mining and spoils	Creation of overburden, waste rock residue deposits or stockpiles with infiltration of leachate due to inadequate basal sealing or leakage from sealed pollution control facilities.	No	Yes	Yes
		Biodiversity - Wildlife and vegetation disturbance	Yes	No	No
		Uncontrolled expansion of mining footprint by not restricting the area disturbed by mining and the associated activities/infrastructure - loss of land with agricultural potential.	Yes	No	Yes
		Disturbance of ecology due to loss of habitat and cumulative impact of illegal collecting or land use during long-term or life of mine can degrade areas and reduce the viability of adjacent areas. Inadequate control of alien species can result in establishment of populations or seed sources that threaten adjacent areas.	Yes	No	Yes
		Long term changes in land use caused by not implementing prompt rehabilitation and maintenance of disturbances when possible as part of annual rehabilitation plan.	Yes	No	Yes
		Visual Intrusion: Visibility of the mining operations	No	Yes	No
		Emissions: Dust, Noise Generation from vehicles that also emit Greenhouse Gases	Yes	No	No
		Increased erosion, dust generation and potential chemical contaminants reduce surface water quality or result in discharge that exceeds the maximum concentrations permitted.	No	Yes	Yes
		Altered storm water runoff response due to large impervious areas and concentrated runoff in drainage systems. Concentrated storm runoff from the pit surrounds and infrastructure areas is erosive, causing sheet, rill and donga erosion features.	No	Yes	Yes
		Impact on heritage artefacts, heritage sites and grave yards	No	Yes	Yes
		Socio- economic impact on existing land use practices	Yes	No	No
		Post mining landform not compatible with the surrounding landscape and not capable of a productive land use that achieves a land capability equal to that of pre-mining conditions	No	Yes	No

DECOM-MISSIONING PHASE	Implementation of Final Rehabilitation, Decommissioning and Mine Closure Plan	Post mining landscape that increases the requirement for long term monitoring and management.	No	Yes	Yes
		Unwanted ruins, buildings, foundations, footings and waste management practices creating or leaving legacies	No	Yes	Yes
		Sub-surface infrastructure remaining behind, limiting the intended post closure land use including footings and foundations and power supply and water installations including pumps and pipelines.	No	Yes	Yes
		Equipment and other items used during the mining operation left behind	No	Yes	Yes
		Incomplete removal of re-usable infrastructure	No	Yes	Yes
		Rubble from demolished infrastructure left behind.	No	Yes	Yes
		Waste classes not kept in separate streams and incomplete removal of waste	No	Yes	Yes
		Stockpiles and leftover product left behind	No	Yes	Yes
		Unsuccessful rehabilitation can reduce the post-mining land use options. Rehabilitated areas could be too unstable to support post-mining land use objectives compatible with surrounding areas.	No	Yes	Yes
		Staff losing their jobs - mine closure can have devastating effects on communities that are reliant on mine-based income Job losses of secondary industries, businesses and contractor's Contractual agreements with service providers surpassing mine closure date	No	Yes	No

8.6 Methodology used in evaluating potential environmental impacts

According to the DEA IEM Series guideline on "Impact Significance" (2002), there are a number of quantitative and qualitative methods that can be used to identify the significance of impacts resulting from a development. The process of determining impact significance should ideally involve a process of determining the acceptability of a predicted impact to society. Making this process explicit and open to public comment and input would be an improvement of the EIA/BA process. The approach to determining significance is generally as follows:

- Use of expert opinion by the specialists ("professional judgement"), based on their experience, a site visit and analysis, and use of existing guidelines and strategic planning documents and conservation mapping (e.g., SANBI biodiversity databases);
- Review of specialist assessment by all stakeholders including authorities as part of the report review process; and
- Quantitative approach - formal matrix calculation of significance as is sometimes done.

Quantitative approach

Evaluating the impact of a risk is to determine the probability (likelihood) of occurring, severity (reversibility of the impact and the degree to which the impact may cause irreplaceable loss of resources), frequency and duration (time scale) of the risk. These are all valued separately and then the individual scores are added and a risk impact is assigned. The calculated sums of the possible permutations of probability, severity, frequency and duration range from 4 to 12.

Environmental Significance rating of insignificant (green - combined score 0-6)

An insignificant impact is likely to contribute to positive decisions about whether or not to proceed with the project. It will have little real effect and is unlikely to have an influence on project design or alternative motivation.

Environmental Significance rating of medium (yellow- combined score 7-9)

If left unmanaged, an impact of medium significance could influence a decision about whether or not to proceed with a proposed project. Mitigation measures should be implemented.

Environmental Significance rating of significant (red- combined score 10-12)

A significant impact could influence a decision about whether or not to proceed with the proposed project, regardless of available mitigation options.

For a risk with a rating of significant, strategies are put in place to reduce the risk to insignificant or medium, provided that the risk can be controlled with management actions. To maintain the rating at insignificant or medium, monitoring is implemented for a period of time to enable the confirmation of the risk as insignificant or as medium and under control.

At the time of final mine closure an application will be made to DMR for a mine closure certificate only when all risks have been confirmed as insignificant or medium and under control via management actions.

8.6.1 Evaluating the probability

There are no standard methods of evaluating the probability or likelihood of occurrence of a risk. All methods used rely on some form of subjective judgment and, therefore, agreed criteria have to be used in the evaluation. Values are assigned for the probability of occurrence of the relative strength of the factors involved to each of the criteria. Three evaluation ratings are used, viz.

- 1 for unlikely to occur (0 – 25% probability)
- 2 for may occur, likely to occur or unknown (26 – 75% probability)
- 3 for definite/has happened/highly likely (>75% probability of occurring)

8.6.2 Evaluating the severity

In evaluating the severity of a potential impact there are various criteria that can be applied to determine the level of risk associated with the consequences of an action occurring. These are the quantity of material/substance released and the probable size of the covered area or possible spread of impact. Combinations of descriptions for what are considered to be different levels of importance for the criteria can be integrated.

Values are assigned for the severity of the relative strength of the factors involved to each of the criteria. Three evaluation ratings are used, viz.

- 1 for insignificant, - natural and social functions and processes are not affected or minimally affected,
- 2 for medium significance - affected environment is notably altered; natural and social functions and processes continue albeit in a modified way and
- 3 for high significance - natural or social functions or processes could be substantially affected or altered to the extent that they could temporarily or permanently cease.

8.6.3 Evaluating the frequency

When evaluating the frequency of a potential impact any repetitive, continuous or time-linked characteristics of the impacts are taken into account. Values are assigned for the frequency of the factors involved to each of the criteria. Three evaluation ratings are used, viz. 1 for once off,

- 2 for intermittent, and
- 3 for ongoing/continuing/usually.

8.6.4 Evaluating the duration

The duration of a potential impact is based on the duration of the impact should the risk realise, i.e., the duration could be short-term, medium-term, long-term or permanent. Values are assigned for the duration of the factors involved to each of the criteria. Three evaluation ratings are used, viz.

- 1 for an instant/point in time,
- 2 for temporary/ intermittent, and
- 3 for forever.

8.7 Positive and negative impacts of proposed activity and alternatives

Positive impacts

- Creation of employment with economic spin-offs for local community.
- Provision of gemstones for international markets.
- Income generation for the local community where subsistence livestock farming is prevalent.

Negative impacts

The key potential negative impacts associated with the mining activity include the following:

- Noise caused by the machinery and vehicles on site, and by vehicles going to and from the mining site.
- Visibility of the mining operations
- Dust emissions from general site activities (vehicle entrained dust).
- Removal of ore change in topography
- Disturbance of biodiversity - vegetation and fauna
- Soil compaction from driving off-road
- Soil and groundwater contamination from hydrocarbons
- Compaction and soil disturbance due to topsoil stockpiling
- Socio- economic impact on existing land use practices
- Impact on heritage artefacts, heritage sites or grave yards

8.8 The possible mitigation measures that could be applied

Refer to Section 10 and 22.4 for the possible mitigation measures included under each impact.

8.9 Motivation where no alternative sites were considered

Alternatives have been considered for this project, as described in Section 6 above. Where alternatives will not be considered in the Impact Assessment Phase, reasons have been provided in Section 6 above.

8.10 Statement Motivating the Preferred Sites

Refer to Section 6 above.

The layout and technology have been determined by the type, shape, position and orientation of the mineral resource. The outcrop identified for mining have been mined previously and show the presence of industrial minerals with an establish local market. With regard to aggregate, lithology, mineral content and mineral distribution is not a factor as the resource is visible above surface and only flakiness and rock integrity had to be investigated to establish a market.

The operational approach is practical and based on best practice to ensure a phased approach of mining followed by rehabilitation in sequential stages

There are therefore no other reasonable or feasible sites, layouts, activities, technologies, or operational alternatives for further consideration in the scoping impact assessment component, other than the mandatory "no-go" alternative that must be assessed for comparison purposes.

9 Process undertaken to identify, assess and rank the impacts and risks

Refer to Figure 3 for the Site Plan of the Preferred and Only Alternative.

Refer to Section 8.5 above where the risks have been described.

Refer to Section 8.6 above where the methodology has been described.

Refer to Section 10 below and section 22.4 for the full Impact Assessment for the Preferred and Only Alternative (Open Pit Mining Activity) compared to the "No-Go" Alternative.

This BAR and EMPr were compiled through a detailed desktop investigation and site assessment in order to determine the environmental setting in which the project is located. Input from stakeholders during the public participation process will also assist the EAP in the identification of any additional impacts associated with the proposed mining activities.

The methodology described above was used to assess the significance of the potential impacts of the mining activities. The assessment of impacts is based on the experience of the EAP.

The mitigation measures proposed are considered to be reasonable and based on the location of the mining area and must be implemented in order for the outcome of the assessment to be accurate.

10 Assessment of each identified potentially significant impact and risk

Significance of Impacts per Activity per Phase

PROJECT ACTIVITY	POTENTIAL ENVIRONMENTAL IMPACT	ENVIRONMENTAL SIGNIFICANCE										MITIGATION SUMMARY
		BEFORE					AFTER					
		Probability	Severity	Frequency	Duration	SIGNIFICANCE	Probability	Severity	Frequency	Duration	SIGNIFICANCE	
Site Access and Site Establishment	<p>SOIL EROSION & SOIL COMPACTION: The clearing of areas for extensions to logistics will result in the removal of existing vegetation and topsoil, which will disturb the soil increasing the potential for soil erosion by wind and loss of soil in the event of rainfall. Soil compaction will result from ongoing repeated use of movement areas and driving off-road.</p> <p>Indirect impacts: Dust impacting on adjacent vegetation and causing a nuisance to workers. Compaction of topsoil where vehicles drive outside demarcated areas damages seed bank and habitat for invertebrates.</p> <p>Residual impacts: Potential loss of invertebrates that live in the top layers of the soil.</p>											<ul style="list-style-type: none"> Existing farm roads and tracks must be used as far as possible; Where new access tracks are required, such tracks must be scarified during decommissioning; Dual use access roads must be handed back to the landowner in a good state of repair. A speed limit of 30km/hour will be displayed and enforced through a fining system. All vehicle drivers using the access road and entering the site will be informed of the speed limit. Movement of vehicles and machinery will be restricted to demarcated areas and roads with no off-road driving permitted. Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces. Reasonable measures must be undertaken to ensure that any exposed areas are adequately protected against the wind and potential stormwater run-off. After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. Top soil shall be removed and stockpiled separately from other soil base layers. The stockpile areas for topsoil are temporary as they will be re-used on a cut and fill basis. Stockpiles should ideally be located to create the least visual impact and must be maintained to avoid erosion of the material. Topsoil storage areas must be convex and should not exceed 2m in height. Topsoil must be treated with care, must not be buried or in any other way be rendered unsuitable for further use (e.g. by mixing with spoil) and precautions must be taken to prevent unnecessary handling and compaction. In particular, topsoil must not be subject to compaction greater than 1 500 kg/m² and must not be pushed by a bulldozer for more than 50 metres. Trucks may not be driven over the stockpiles. Reduce drop height of material to a minimum. Temporarily halt material handling in windy. <p>Where new access tracks are required, such tracks must be scarified during decommissioning;</p> <ul style="list-style-type: none"> Dual use access roads must be handed back to the landowner in a good state of repair. A speed limit of 30km/hour will be displayed and enforced through a fining system. All vehicle drivers using the access road and entering the site will be informed of the speed limit. Soil erosion is to be regularly monitored and repaired. Compacted areas that are no longer required shall be scarified after use as part of the annual rehabilitation plan.

<p>Site Access and Site Establishment</p>	<p>SOIL AND GROUNDWATER CONTAMINATION & WASTE MANAGEMENT: Mitigated impact of the proposed facility on the groundwater quality is deemed insignificant during all phases although surface and groundwater contamination from hydrocarbons is a possibility. No permanent surface water resources are in close proximity to the quarries or mining logistics.</p> <p>Indirect impacts: Rainfall is very seldom and evaporation rate is very high. Indirect impacts on surface water are very unlikely. Windblown litter will cause visual blight. Hydrocarbons are toxic and will cause vegetation die-back and soil poisoning.</p> <p>Residual impacts: A lack of waste food management encourages vermin.</p>	1	3	1	1	6	1	1	1	1	4	<ul style="list-style-type: none"> • Implement and follow water saving procedures and methodologies. • Fuel storage must be contained in mobile bowsers and refuelling will be done with care to minimise the chance of spillages • Only re-fuel machines at fueling station, construct structures to trap fuel spills at fueling station • Immediately clean oil and fuel spills and dispose contaminated material (soil, etc.) at licensed sites only. • A spill kit will be available on each site where activities are in progress. • Provide mobile ablution facilities and take care that onsite sanitation facilities are well maintained and serviced regularly. • Draw-up and strictly enforce procedures for the storage, handling and transport of different hazardous materials. • Ensure that good housekeeping rules are applied. • Oils and lubricants must be stored within sealed containment structures. • Minimise storage of hazardous substances onsite • Any mechanical equipment maintenance must be undertaken on drip trays or UPVC sheets to prevent spills/ leaks onto the soil. • When not in use, a drip tray must be placed beneath mechanical equipment and vehicles. • Ensure vehicles and equipment are in good working order and regularly inspected for leaks and drivers and operators are properly trained. • Waste materials generated on site must be stored in suitable lidded containers and removed off site to a suitable disposal facility. • Waste separation must be undertaken if practical for recycling. • Drinking and process water to be brought on site. • No water will be abstracted in terms of section 21(a) of National Water Act, 1998 (Act no. 36 of 1998). • Waste water (i.e., including process water and grey water) must be kept separate from clean water. • Establishing controlled runoff from washing bays, • The flow and end destination of decontamination washing water will be controlled. • Although erosion and runoff are natural processes it should be managed by maintaining topsoil in any areas not in use and maintaining maximum vegetation coverage. • Slow storm water runoff with storm water diversion and erosion control contour berms • Separate clean and contaminated water systems around the pit and infrastructure areas.
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Site Access and Site Establishment	<p>LIMITED LOSS OF NATURAL VEGETATION AND ECOLOGICAL FUNCTIONING</p> <p>Wildlife and Vegetation disturbance</p> <p>Indirect impacts:</p> <p>Soil disturbance caused by vegetation clearing will provide suitable conditions for the establishment and spreading of alien invasive vegetation.</p> <p>Removal of alien invasive vegetation if required, is a positive impact, and will benefit the ecological functioning.</p> <p>Residual impacts:</p> <p>The local fauna is familiar with the existing mining activities on site.</p>	3	3	1	1	8	2	1	1	1	5	<ul style="list-style-type: none"> • Refer to Diagrams 3, which show the proposed area for mining and the existing tracks that will be used. • Mining is adjacent to existing large scale granite mining where little vegetation naturally occurs. • All development areas must be clearly demarcated, and no activities may take place outside of demarcated areas. • Limiting activities to the smallest area that is necessary. • Remove alien invasive vegetation if required and ensure ongoing alien vegetation clearing in the area. • No indigenous plants outside of the demarcated work areas may be damaged. • Impliment concurrent rehabilitation in terms of the annual rehabilitation plan •The noise and vibration caused by the earthmoving equipment will disturb smaller animals (e.g., snakes). These will move away whilst operations are in progress. •Should any animals be encountered these should be moved away if necessary. • Vehicles speed must take into account the possibility of collisions with fauna.
	<p>VISUAL INTRUSION:</p> <p>Caused by machinery, topsoil stockpiles, cleared areas, and movement of trucks on site during preparation of site establishment. The site is remote and rural in nature with very few receptors (people or nearby public roads) and is located on private property.</p> <p>Indirect impacts:</p> <p>There are few indirect impacts as the area is remote and rural, with no people (receptors) living near the site..</p> <p>Residual impacts:</p> <p>Good housekeeping will ensure a neat and well-maintained construction area reducing visual impact.</p>	3	2	1	3	9	2	2	1	2	7	<ul style="list-style-type: none"> • The construction areas shall be kept neat and tidy at all times. • Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly.
	<p>EMMISSIONS (DUST, VEHICLES & NOISE):</p> <p>Noise and dust will be created by mining equipment (e.g. front- end loaders) and vehicles, which will emit Greenhouse Gases.</p> <p>Indirect impacts:</p> <p>Carbon emissions from vehicle exhausts have a negative impact on the ozone layer.</p> <p>Local residents along the access tracks and roads would be impacted on by noise, dust and vehicle emissions during the construction activities.</p> <p>Increase in Greenhouse Gas Emissions from vehicles.</p> <p>Residual impacts:</p> <p>Carbon emissions have impact on climate change.</p>	3	2	1	1	7	1	1	1	1	4	<ul style="list-style-type: none"> • The Applicant shall adhere to the local by-laws and regulations regarding the noise and associated hours of operation • All mining activities will be limited to daylight hours during weekdays and no activities on Sundays and public holidays. • Noise abatement equipment, such as mufflers on diesel engines, will be maintained in good condition. • The Applicant shall limit noise levels (e.g. install and maintain silencers on machinery). The provisions of SANS 1200A Sub clause 4.1 regarding "built-up" area shall apply to all areas within audible distance of residents whether in urban, peri-urban or rural areas. • If intrusive noise levels are experienced by any person at any point, the source of the noise will be moved if practical, or it will be placed in an acoustic enclosure, or an acoustic barrier will be erected between the source and the recipient. • Due to the remote location of the site, dust emissions are unlikely to be a source of nuisance; however the site must be wetted if required. • Hauling vehicles shall adhere to municipal and provincial traffic regulations including speed limits. • Vehicles used on site for the construction related activities shall be maintained and in a good working condition so as to reduce emissions. • Engines shall be turned off when the vehicle is temporarily parked or stationery for long periods. • Stockpiles must be maintained (covered where necessary) to avoid wind erosion of the material. • Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces.

Site Access and Site Establishment	<p>POTENTIAL FOR HERITAGE, PALAEOLOGICAL AND CULTURAL IMPACTS:</p> <p>Refer to Appendix 3.</p> <p>The archaeological resources were identified during a field assessment and aside from the low significance impacts to the landscape, there are no heritage concerns for this project. No areas require avoidance or buffering.. Some mitigation has been proposed.</p> <p>Indirect impacts: Loss of context</p> <p>Residual impacts: None identified for insignificant findings.</p>	1	2	1	1	5	1	1	1	1	4	<ul style="list-style-type: none"> • If any heritage or paleontological resources are discovered as a result of the mining activities, such activities will cease with immediate effect and a qualified archaeologist and or palaeontologist will be commissioned to assess their significance and determine appropriate mitigation measures. • All personnel and contactors will be made aware of the locations of all identified resources and the necessity of avoiding them. • A safe distance of at least 50 metres will be maintained between the identified resource and mining activities.
	<p>CREATION OF EMPLOYMENT & JOB SECURITY DURING CONSTRUCTION PHASE WITH LOCAL AND REGIONAL ECONOMIC SPIN-OFFS</p> <p>Indirect impacts: Upskilling Local economic spin-offs through increased income earned, and through purchasing of local materials Income generation for landowners in a time of severe drought where livestock farming is not sustainable.</p> <p>Residual impacts: The upliftment of unemployed people, with positive impact on standard of living for their families. Local and regional economic spin-offs from investment.</p>					POSITIVE IMPACT					POSITIVE IMPACT	<ul style="list-style-type: none"> • Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling). • Any other mining companies operating legally will be listed as affected parties and consulted. Areas of operations will be demarcated and no overlapping will be allowed. • All operations will be carried out under the guidance of strong, experienced manager with proven skills in public consultation and conflict resolution. • There will be a strict requirement to treat local residents with respect and courtesy at all times.

OPERATIONAL	<p>CHANGE IN TOPOGRAPHY: Mining operations commonly have a permanent impact on rock masses that influences the topography on the site and can impact post-mining slope stability.</p> <p>Indirect impacts: Increase in habitat creation for fauna (rock hyrax and lizards) on waste rock dumps.</p> <p>Residual impacts: Visual change in landscape and topography following rehabilitation. Creation of new habitats.</p>	3	2	2	3	10	3	1	1	2	7	<ul style="list-style-type: none"> • The focus of topographic rehabilitation may not be obvious at the time of mine planning and must be addressed as the mine develops and the Closure Plan must be reviewed periodically for continued relevance in the light of changed mine path or long-term plans. • Manage the risks associated with high wall stability and slope stability of the excavation to ensure a safe post mining landscape without the requirement for long term monitoring and management. • During production no highwalls will be created by removing the outcrop in benches to increase stability. • The mine floor will be kept level and overburden and oversized rock will be backfilled on a continuous basis as the quarry developed. • Slope pit floor to prevent pooling of rainwater. • Regular inspections and audits will be used as management system to ensure compliance. • At final closure of the operation all remaining product from the demarcated stockpile will be restored to pits to fill any remaining deep excavations if any. • 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. • The basic rehabilitation methodology will therefore strive to replicate the pre-mining topography, wherever possible, or at least not to increase overall slope gradients without placement of adequately designed erosion control or runoff diversion structures.
	<p>SOIL EROSION & SOIL COMPACTION: The potential for soil erosion by wind and storm water run-off; soil compaction from repeated use of access tracks.</p> <p>Indirect impacts: Dust impacting on adjacent vegetation and causing a nuisance to workers. Compaction of topsoil where vehicles drive outside demarcated areas damages seed bank and habitat for invertebrates.</p> <p>Residual impacts: Unmanaged soil erosion will result in loss of topsoil. Unmanaged dust from unsurfaced roads will cause a nuisance and impact on the health of the workers. Dust impacting on adjacent vegetation decreasing palatability for livestock and fauna.</p>	2	2	1	1	6	1	1	1	1	4	<ul style="list-style-type: none"> • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. • Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces. • Reasonable measures must be undertaken to ensure that any exposed areas are adequately protected against the wind and potential stormwater run-off. • Stockpiles should ideally be located to create the least visual impact and must be maintained to avoid erosion of the material. • Reduce drop height of material to a minimum. • Temporarily halt material handling in windy conditions. • A speed limit of 30km/hour will be displayed and enforced through a fining system. All vehicle drivers using the access road and entering the site will be informed of the speed limit. • Compacted areas that are not required for access shall be scarified after use during decommissioning and rehabilitation. • The basic rehabilitation methodology will therefore strive to replicate the pre-mining topography, wherever possible, or at least not to increase overall slope gradients without placement of adequately designed erosion control or runoff diversion structures. • Provision must also be made for efficient storm water control to prevent erosion of roadways. • Soil erosion on haul roads is to be regularly monitored and repaired.

OPERATIONAL	<p>SOIL AND GROUNDWATER CONTAMINATION & WASTE MANAGEMENT:</p> <p>Mitigated impact of the proposed facility on the groundwater quality is deemed insignificant during all phases although surface and groundwater contamination from hydrocarbons is a possibility. No permanent surface water resources are in close proximity to the quarries or mining logistics. Due to semi-arid conditions the opencast pits will not intercept shallow groundwater table zones. Any hydrocarbon spillages have low potential to contaminate groundwater.</p> <p>Indirect impacts: Rainfall is very seldom and evaporation rate is very high. Indirect impacts on surface water are very unlikely.</p> <p>Should natural surface run-off occur on excavated surfaces that are being actively mined, it could pool in areas of accumulated water.</p> <p>Windblown litter will cause visual blight.</p> <p>Hydrocarbons are toxic and will cause vegetation die-back and soil poisoning.</p>	2	3	1	1	7	1	1	1	1	4	<ul style="list-style-type: none"> • Ensure maintenance of reticulation pipes for water supply. • Draw-up and strictly enforce procedures for the storage, handling and transport of different hazardous materials • Implement and follow water saving procedures and methodologies. • Fuel storage must be contained in mobile bowzers and refuelling will be done with care to minimise the chance of spillages • Only re-fuel machines at fueling station, construct structures to trap fuel spills at fueling station • Immediately clean oil and fuel spills and dispose contaminated material (soil, etc.) at licensed sites only. • A spill kit will be available on each site where activities are in progress. • Take care that temporary onsite sanitation facilities are well maintained and serviced regularly. • Ensure that good housekeeping rules are applied. • Oils and lubricants must be stored within sealed containment structures. • Minimise storage of hazardous substances onsite • Any mechanical equipment maintenance must be undertaken on drip trays or UPVC sheets to prevent spills/ leaks onto the soil. • When not in use, a drip tray must be placed beneath mechanical equipment and vehicles. • Ensure vehicles and equipment are in good working order and regularly inspected for leaks and drivers and operators are properly trained. • Waste materials generated on site must be stored in suitable lidded containers and removed off site to a suitable disposal facility. • Waste separation must be undertaken if practical for recycling. • Provide mobile ablution facilities • Drinking and process water to be brought on site. • Waste water (i.e., including process water and grey water) must be kept separate from clean water. • Establishing controlled runoff from washing bays, • The flow and end destination of decontamination washing water will be controlled. • Although erosion and runoff are natural processes it should be managed by maintaining topsoil in any areas not in use and maintaining maximum vegetation coverage. • Slow storm water runoff with storm water diversion and erosion control contour berms
	<p>Residual impacts: Pooled water could provide drinking source for local fauna.</p> <p>Increase in habitat creation for fauna (rock hyrax and lizards) on waste rock dumps.</p> <p>Recycling of waste material creates employment</p>											

OPERATIONAL	<p>LIMITED LOSS OF NATURAL VEGETATION AND ECOLOGICAL FUNCTIONING IN A CRITICAL BIODIVERSITY AREA 1 (CBA 1)</p> <p>Wildlife and Vegetation disturbance</p> <p>Indirect impacts: Soil disturbance caused by vegetation clearing will provide suitable conditions for the establishment and spreading of alien invasive vegetation. Removal of alien invasive vegetation if required, is a positive impact, and will benefit the ecological functioning.</p> <p>Residual impacts: The local fauna is familiar with the existing mining activities on site.</p>	3	3	1	1	8	2	1	1	1	5	<ul style="list-style-type: none"> • Refer to Diagrams 3, which show the proposed area for mining and the existing tracks that will be used. • Mining will continue from an historic mining operation where little vegetation naturally occurs. • All development areas must be clearly demarcated, and no activities may take place outside of demarcated areas. • Limiting activities to the smallest area that is necessary. • Remove alien invasive vegetation if required and ensure ongoing alien vegetation clearing in the area. • No indigenous plants outside of the demarcated work areas may be damaged. • Implement concurrent rehabilitation in terms of the annual rehabilitation plan • The noise and vibration caused by the earthmoving equipment will disturb smaller animals (e.g.; snakes). These will move away whilst operations are in progress. Should any animals be encountered these should be moved away if necessary. • Vehicles speed must take into account the possibility of collisions with fauna.
	<p>VISUAL INTRUSION: Caused by machinery, topsoil stockpiles, cleared areas, and movement of trucks on site during preparation of site establishment.</p> <p>Indirect impacts: There are few indirect impacts as the area is remote and rural, with no people (receptors) living near the site. The local topography and landscape is already altered due the existing mines.</p> <p>Residual impacts: Good housekeeping will ensure a neat and well-maintained construction area reducing visual impact.</p>	3	2	1	2	8	1	1	1	1	4	<ul style="list-style-type: none"> • The construction areas shall be kept neat and tidy at all times. • Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly.

OPERATIONAL	<p>EMMISSIONS (DUST, VEHICLES & NOISE): Noise and dust will be created by mining equipment (e.g. front- end loaders) and vehicles, which will emit Greenhouse Gases.</p> <p>Indirect impacts: Carbon emissions from vehicle exhausts have a negative impact on the ozone layer. Local residents along the access tracks and roads would be impacted on by noise, dust and vehicle emissions during the construction activities. Increase in Greenhouse Gas Emissions from vehicles.</p> <p>Residual impacts: Carbon emissions have impact on climate change.</p>	3	2	1	1	7	1	1	1	1	4	<ul style="list-style-type: none"> • Health and safety equipment is required for workers. • Vehicles used on site for the construction related activities shall be maintained and in a good working condition so as to reduce emissions. • Engines shall be turned off when the vehicle is temporarily parked or stationery for long periods. • Due to the remote location of the site, dust emissions are unlikely to be a source of nuisance; however the site must be wetted if required. • Stockpiles must be maintained (covered where necessary) to avoid wind erosion of the material. • Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces. • The wetting of the saws helps reduce dust generation during cutting of the blocks. • Existing tracks will be used as haul roads and will only be upgraded to facilitate haul trucks by applying dust suppression and/or hardening compound such as Macadamite. • On public roads the vehicles shall adhere to municipal and provincial traffic regulations including speed limits. • The Applicant shall adhere to the local by-laws and regulations regarding the noise and associated hours of operation • All mining activities will be limited to daylight hours during weekdays and no activities on Sundays and public holidays. • Noise abatement equipment, such as mufflers on diesel engines, will be maintained in good condition. • The Applicant shall limit noise levels (e.g. install and maintain silencers on machinery). The provisions of SANS 1200A Sub clause 4.1 regarding “built-up” area shall apply to all areas within audible distance of residents whether in urban, peri-urban or rural areas. • If intrusive noise levels are experienced by any person at any point, the source of the noise will be moved if practical, or it will be placed in an acoustic enclosure, or an acoustic barrier will be erected between the source and the recipient.
	<p>POTENTIAL FOR HERITAGE, PALAEOLOGICAL AND CULTURAL IMPACTS: Refer to Annexure 3. The archaeological resources were identified during a field assessment and their heritage significance is rated as low-moderate. Some mitigation has been proposed.</p> <p>Indirect impacts: Loss of context</p> <p>Residual impacts: None identified for insignificant findings.</p>	1	2	1	1	5	1	1	1	1	4	<ul style="list-style-type: none"> • If any heritage or paleontological resources are discovered as a result of the mining activities, such activities will cease with immediate effect and a qualified archaeologist and or palaeontologist will be commissioned to assess their significance and determine appropriate mitigation measures. • All personnel and contactors will be made aware of the locations of all identified resources and the necessity of avoiding them. • A safe distance of at least 50 metres will be maintained between the identified resource and mining activities.

<p style="text-align: center;">OPERATIONAL</p>	<p>CREATION OF EMPLOYMENT & JOB SECURITY DURING CONSTRUCTION PHASE WITH LOCAL AND REGIONAL ECONOMIC SPIN-OFFS</p> <p>Indirect impacts: Upskilling Local economic spin-offs through increased income earned, and through purchasing of local materials Income generation for landowners in a time of severe drought where livestock farming is not sustainable.</p> <p>Residual impacts: The upliftment of unemployed people, with positive impact on standard of living for their families. Local and regional economic spin-offs from investment.</p>					<p style="text-align: center;">POSITIVE IMPACT</p>					<p style="text-align: center;">POSITIVE IMPACT</p>	<ul style="list-style-type: none"> • Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling). • Any other mining companies operating legally will be listed as affected parties and consulted. Areas of operations will be demarcated and no overlapping will be allowed. • All operations will be carried out under the guidance of strong, experienced manager with proven skills in public consultation and conflict resolution. • There will be a strict requirement to treat local residents with respect and courtesy at all times.
<p style="text-align: center;">Decommissioning and Closure Phase</p>	<p>REHABILITATION OF MINED AND CLEARED AREAS: As per Rehabilitation, Decommissioning and Mine Closure Plan (Appendix 1)</p> <p>Indirect impacts: Ore bodies like granite that lend themselves to open-pit mining are not prone to causing water pollution and therefore water accumulating in the rehabilitated pit can usually be used for a number of purposes.</p> <p>Residual impacts: Increase in natural habitat following rehabilitation processes.</p>					<p style="text-align: center;">POSITIVE IMPACT</p>					<p style="text-align: center;">POSITIVE IMPACT</p>	<ul style="list-style-type: none"> • Implementation of Final Rehabilitation, Decommissioning and Mine Closure Plan. • The focus of topographic rehabilitation may not be obvious at the time of mine planning and must be addressed as the mine develops and the Closure Plan must be reviewed periodically for continued relevance in the light of changed mine path or long-term plans. • Implementation of the tasks detailed under waste management to manage the risks associated with high wall stability of the quarry and slope stability of the waste dump will ensure a safe post mining landscape without the requirement for long term monitoring and management. Regular inspections and audits will be used as management system to ensure compliance. • At final closure of the operation all remaining product (blocks) from the demarcated stockpile will be restored to pit wherever possible to reduce highwall height and provide surface for rehabilitation or used to fill any remaining deep excavations if any. • The infrastructure area will be screened for petrochemical spills and cleaned and waste from the temporary storage facility will be removed and the area cleaned. • The compacted salvage yard, lay down and movement areas will be screened for petrochemical spills and cleaned before it is ripped and levelled. • Redundant structures, buildings and civil foundations (down to one meter below surface for subsurface infrastructure) will be removed for use elsewhere or demolished and discarded. • All redundant infrastructure and services needs to be demolished including ruins, buildings, foundations and footings. • Building rubble will be used as backfill in excavations or removed from site in the absence of excavations. • Remove all power and water supply installations not to be retained by landowner in terms of section 44 of the MPRDA. • Removing underground infrastructure to one meter below surface. • Excavations created by removing subsurface infrastructure needs to be filled, levelled and compacted. • Final walk through of complete mining lease area to ensure no mining related waste and of re-usable infrastructure remain on site. • As part of this phase training of personnel in the implementation of the Closure Plan will done and the implementation of the environmental awareness plan will be an ongoing process.

11 Summary of specialist reports.

Summary of Specialist Reports

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS INCLUDED IN THE EIA REPORT	SECTION WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED.
Heritage Impact Assessment (Attached as Appendix 3)	No mitigation is required. Should any heritage resources be found SAHRA should be contacted immediately.	Yes	Section 10

12 Environmental impact statement

12.1 Summary of the key findings of the environmental impact assessment

All of the negative identified impacts will occur for a limited period and the extent of the negative impacts will be localised. All of the identified impacts can be suitably mitigated. There is a correlation between cumulative impacts post mitigation, and significance rating of impacts after mitigation as indicated in Section 10.

12.2 Final Site Map

Please refer to **Figure 2** for the target area of interest for proposed mining activities.

12.3 Summary of the positive and negative impacts and risks of the proposed activity and identified alternatives

The significance ratings of impacts after mitigation on the key aspects of the “preferred alternative” and the “no go” alternative are shown per Phase in the following table.

Summary of the Significance Ratings of Impacts after Mitigation

IMPACTS AND ASPECTS	PREFERRED/ONLY ALTERNATIVE	NO-GO ALTERNATIVE
1. SOIL EROSION AND COMPACTION: The clearing of areas for logistics will result in the removal of existing vegetation and topsoil, which will disturb the soil increasing the potential for soil erosion by wind and loss of soil in the event of rainfall. Soil compaction will result from ongoing repeated use of movement areas and driving off-road.	Low / Insignificant Risk	N/A
2. SOIL AND GROUNDWATER CONTAMINATION & WASTE MANAGEMENT: Mitigated impact of the proposed facility on the groundwater quality is deemed insignificant during all phases although surface and groundwater contamination from hydrocarbons is a possibility. No permanent surface water resources are in close proximity to the quarries or mining logistics.	Low / Insignificant Risk	N/A
3. CHANGE IN TOPOGRAPHY: Open pit mining operations commonly have a permanent impact on rock masses that influences the topography on the site and can impact post-mining slope stability. This operation will continue from a historic un-rehabilitated mine still subject to illegal mining. Any rehabilitation will have a positive impact.	Low / Insignificant Risk	N/A
4. LIMITED LOSS OF NATURAL VEGETATION AND ECOLOGICAL FUNCTIONING Wildlife and Vegetation disturbance	Low / Insignificant Risk	N/A
5. VISUAL INTRUSION: Caused by machinery, topsoil stockpiles, cleared areas, and movement of trucks. The site is remote and rural in nature with very few receptors (people or nearby public roads) and is located on private property.	Low / Insignificant Risk	N/A
6. EMISSIONS (DUST, VEHICLES & NOISE): Noise and dust will be created by mining equipment (e.g., front-end loaders) and vehicles, which will emit Greenhouse Gases.	Low / Insignificant Risk	N/A
7. POTENTIAL FOR HERITAGE, PALAEOANTHROPOLOGICAL AND CULTURAL IMPACTS: The archaeological resources were identified during a field assessment and their heritage significance is rated as low. Some mitigation has been proposed.	Low / Insignificant Risk	N/A
8. CREATION OF EMPLOYMENT & JOB SECURITY WITH LOCAL AND REGIONAL ECONOMIC SPIN-OFFS	Medium (+)	Medium (-)

13 Proposed impact management objectives and the impact management outcomes for inclusion in the EMPr

13.1 Management Objectives

- Objective 1 - To create a safe and healthy post-mining environment
 - Safe excavations
 - Slope stability of remaining excavation
 - No potentially dangerous areas secured if required
 - Limited residual environmental impact
 - Develop a landscape that reduces the requirement for long term monitoring and management
 - No surface and/or groundwater contamination
 - Waste management practices not creating or leaving legacies
- Objective 2 - To create a stable, free draining post mining landform, which is compatible with the surrounding landscape
 - Economically viable and sustainable land, as close as possible to its natural state.
 - Prepare area to promote natural re-establishment of vegetation that is self-sustaining, perpetual and provides a sustainable habitat for local fauna and successive flora species
 - Prevent long term changes in land use by implementing prompt rehabilitation and maintenance of disturbances when possible as part of annual rehabilitation plan.
 - Stable, free draining post mining landform
 - Prevent alteration or diverting natural drainage lines and reduced natural runoff.
 - Prevent concentration of runoff, mixing of clean runoff with contaminated runoff and creation of large open water bodies.
- Objective 3 – To provide optimal post-mining social opportunities
 - Optimised benefits for the social environment
 - Positive and transparent relationships with stakeholders and maintaining communication channels, providing stakeholders including government authorities with relevant information as per legislative requirements.
 - Undertaking environmental management according to approved EMPr and Closure plans and regular auditing of the environmental management system.
 - Minimal negative aesthetic impact
 - Mitigate the nuisance effects of air emissions (dust), visual intrusion and the cumulative effect of a raise in the ambient noise levels
 - Prevent disturbance of archaeological sites and implement mitigating measures according to the archeological assessment.

13.2 Outcomes

- By providing sufficient information to strategically plan the mining activities, unnecessary social and environmental impacts will be avoided.
- Ensure an approach that will provide the necessary confidence in terms of environmental compliance.
- Provide a EMPr and Closure Plan that is effective and practical for implementation.

- Through the implementation of the proposed mitigation measures it is anticipated that the identified social and environmental impacts can be managed and mitigated effectively.
- Noise generation can be managed through consultation and restriction of operating hours and by maintaining equipment and applying noise abatement equipment if necessary.
- Dust fall can be managed by reducing driving speeds when driving on unpaved roads.
- Wildlife disturbance and clearance of vegetation will be limited to the absolute minimum required and disturbed areas will be re-vegetated with locally indigenous species as soon as possible.
- Surface water and groundwater contamination by hydrocarbons can be managed by conducting proper vehicle maintenance, refueling with care to minimise the chance of spillages and by having a spill kit available on each site where mining activities are in progress.

14 Aspects for inclusion as conditions of Authorisation.

It is the opinion of the EAP that the following conditions should form part of the authorisation:

- All mining and rehabilitation to be conducted as per the approved EMPr, and Rehabilitation, Decommissioning and Closure Plan (Annexure 1).
- Concurrent mining and rehabilitation must be done.
- The proposed mining area must be clearly demarcated with semi-permanent markers.
- The mining operator must appoint a suitably qualified ECO who will be responsible for ensuring compliance with the requirements of the EMPr during the mine operation and decommissioning.
- Should any burials, fossils or other historical material be encountered during construction, work must cease immediately and SAHRA must be contacted, as detailed in Annexure 3.
- The mine operation must follow an Integrated Waste Management approach. Control measures must be implemented to prevent pollution of any water resource or soil surface by oil, grease, fuel or chemicals. Appropriate pollution prevention measures must be implemented to prevent dust.
- A speed limit of 30km/hour will be displayed and enforced through a fining system. All vehicle drivers will be informed of the speed limit applicable. The access road will be maintained during operational activities.

15 Description of any assumptions, uncertainties and gaps in knowledge.

- The desk-top research included reference to the SANBI BGIS database map viewer for the various baseline environmental attributes, and any assumptions or gaps in knowledge expressed by SANBI in the provision of this information would be applicable to this information as referenced.
- It is assumed that the proposed mitigation measures as listed in this report and included in the EMPr will be implemented and adhered to. Mitigation measures are proposed which are considered reasonable and must be implemented in order for the outcome of the assessment to be accurate.
- It is assumed that the Rehabilitation, Decommissioning and Closure Plan (Annexure 1) and any annual rehabilitation plans as part of production, will be implemented and adhered to.

16 Reasoned opinion as to whether the proposed activity should or should not be authorized

16.1 Reasons why the activity should be authorized

It is the opinion of the EAP that the proposed mining activity should be authorised. In reaching this conclusion the EAP has considered that:

- The “preferred alternative” takes into account location alternatives, activity alternatives, layout alternatives, technology alternatives and operational alternatives.
- The approach taken is that it is preferable to avoid significant negative environmental impacts, wherever possible.
- The mining area is located on the boundary between a CBA 1 and CBA 2; however, the mining area is located within an area transformed by historic mining. It is the opinion of the EAP that the underlying biodiversity objectives and ecological functioning will not be compromised, subject to the strict adherence to the EMPr and Rehabilitation, Decommissioning and Closure Plan (Annexure 1).
- No significant negative impacts have been identified that are so severe as to prevent the proposed mining activity from taking place.
- The activity has been assessed to have a positive socio-economic impact, especially in terms of the creation of employment.
- Provided the recommended mitigation measures are implemented and mining activities are managed in accordance with the stipulations of the EMPr, and Rehabilitation, Decommissioning and Mine Closure Plan (Annexure 1), in an environmentally sound manner, the potential negative impacts associated with the implementation of the preferred alternative can be reduced to acceptable levels.

16.2 Conditions that must be included in the authorisation

As per section 14 above:

17 Period for which the Environmental Authorisation is required

The authorisation is required for the duration of the mining permit which is an initial 2 years plus a potential to extend the permit by an additional 3 years. Normally there is also a time delay in the granting of applications for renewal therefore a total period of 10 years may be required.

18 Undertaking

It is confirmed that the undertaking required to meet the requirements of this section is provided at the end of the EMPr and is applicable to both the Basic Assessment Report (BAR) and the Environmental Management Programme report (EMPr).

19 Financial Provision

19.1 Legal Framework

According to regulation 7 of the NEMA Financial Provisioning Regulation, 2015 the applicant or holder of a right or permit must ensure that the financial provision is, at any given time, equal to the sum of the actual costs of implementing the plans and report contemplated in regulation 6 and regulation 11(1).

In terms of regulation 11(1) the holder of a right or permit must ensure that a review is undertaken of the requirements for (a) annual rehabilitation, as reflected in an annual rehabilitation plan; (b) final rehabilitation, decommissioning and closure of the

prospecting, exploration, mining or production operations at the end of the life of operations as reflected in a final rehabilitation, decommissioning and mine closure plan; and (c) remediation of latent or residual environmental impacts which may become known in the future, including the pumping and treatment of polluted or extraneous water, as reflected in an environmental risk assessment report.

Financial provision in terms of reg. 6(c) are covered by the requirements for the actual costs of implementation of the measures required for final rehabilitation, decommissioning and closure of the mining operations at the end of the life of operations as reflected in the final rehabilitation, decommissioning and mine closure plan in terms of regulation 6(b) and attached as Annexure 1.

19.2 Calculation

Financial provision in terms of reg. 6(c) is covered by the requirements for the actual costs of implementation of the measures required for final rehabilitation, decommissioning and closure of the mining operations at the end of the life of operations as reflected in the final rehabilitation, decommissioning and mine closure plan in terms of regulation 6(b) and attached as Annexure 1.

19.3 Explain how the aforesaid amount was derived.

According to regulation 6 an applicant must determine the financial provision through a detailed itemisation of all activities and costs, calculated based on the actual costs of implementation of the measures required for— (a) annual rehabilitation, as reflected in an annual rehabilitation plan; (b) final rehabilitation, decommissioning and closure of the prospecting, exploration, mining or production operations at the end of the life of operations, as reflected in a final rehabilitation, decommissioning and mine closure plan; and (c) remediation of latent or residual environmental impacts which may become known in the future, including the pumping and treatment of polluted or extraneous water, as reflected in an environmental risk assessment report (Refer Annexure 1).

19.4 Confirm that this amount can be provided for from operating expenditure.

The amount needed for the implementation of the final rehabilitation, decommissioning and closure plan will be provided to DMR in the form of a bank guarantee and the plan will be revised on an annual basis in terms of regulation 11(1) of the Nema Financial Regulations 2015.

Provision for implementation of annual rehabilitation plan to be provided as part of the environmental audit report in terms of Regulation 34 (1)(b) of the NEMA EIA Regulations (2014) will be provided as part of the operational budget and proof of access to the necessary fund were provided as part of the PWP together with proof of access to the necessary financial resources.

20 Specific Information required by the competent Authority

20.1 Compliance with sections 24(4)(a) and (b) of NEMA

According to the National Environmental Management Act (Act 107 of 1998). the EIA report must include a description of the impact on the following:

20.1.1 Impact on the socio-economic conditions of any directly affected person

A full consultation process is being implemented during the environmental authorisation process. The purpose of the consultation is to provide affected persons the opportunity to raise any potential concerns. Concerns raised have been captured and addressed within the public participation section of this report (attached as Annexure 2) to inform the decision-making process.

20.1.2 Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act

The potential impact on heritage resources is unlikely as confirmed by the Heritage Impact Assessment attached at Annexure 3.

21 Other matters required in terms of sections 24(4)(a) and (b) of the Act.

A motivation for not investigating reasonable and feasible alternatives is provided above.

PART B ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

22 Environmental Management Program

22.1 Details of the EAP,

This has already been covered. Refer **Section 1** of this document.

22.2 Description of the Aspects of the Activity

This has already been covered. Refer **Section 4** of this document.

22.3 Composite Map

This has already been covered. Refer **Figure 1 & 2**.

22.4 Impacts to be mitigated in their respective phases

<p>ACTIVITY - Site Access and Site Establishment</p>	<p>PHASE Construction</p>	<p>SIZE AND SCALE of disturbance Logistical facilities & movement area 0.5Ha Quarry Floor/Excavation 3.0Ha Dispatch Yard/Stockpile Area: 0.5Ha Total footprint is 5ha</p>
<p>COMPLIANCE WITH STANDARDS NEMA Section 2 Principles Environmental Authorisation</p>	<p>TIME PERIOD FOR IMPLEMENTATION OF MITIGATION MEASURES Start of activity and continuous as mining progresses over the site during construction period (site access and site establishment activities). Upon cessation of each activity where applicable. Immediately in the event of spills</p>	
<p>MITIGATION MEASURES Impact 1: Soil erosion & soil compaction</p> <ul style="list-style-type: none"> • Existing farm roads and tracks must be used as far as possible; • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. • Stabilized areas shall be demarcated accordingly. • Movement of vehicles and machinery will be restricted to demarcated areas and roads with no off-road driving permitted. • Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces. • Reasonable measures must be undertaken to ensure that any exposed areas are adequately protected against the wind and potential stormwater run-off. • Top soil shall be removed and stockpiled separately from other soil base layers. • The stockpile areas for topsoil are temporary as they will be re-used during final closure. • Stockpiles should ideally be located to create the least visual impact and must be maintained to avoid erosion of the material. • Topsoil storage areas must be convex and should not exceed 2m in height. • Topsoil must be treated with care, must not be buried or in any other way be rendered unsuitable for further use (e.g., by mixing with spoil) and precautions must be taken to prevent unnecessary handling and compaction. • In particular, topsoil must not be subject to compaction greater than 1 500 kg/m² and must not be pushed by a bulldozer for more than 50 metres. • Trucks may not be driven over the topsoil stockpiles. • Reduce drop height of material to a minimum. • Temporarily halt material handling in windy. • Where new access tracks are required, such tracks must be scarified during decommissioning; • Dual use access roads must be handed back to the landowner in a good state of repair. • A speed limit of 30km/hour will be displayed and enforced through a fining system. All vehicle drivers using the access road and entering the site will be informed of the speed limit. • Soil erosion is to be regularly monitored and repaired. • Compacted areas that are no longer required shall be scarified after use as part of the annual rehabilitation plan. 		

MITIGATION MEASURES Impact 2: Soil and Water Contamination & General Waste Management

- Implement and follow water saving procedures and methodologies.
- Fuel storage must be contained in mobile bowsers and refuelling will be done with care to minimise the chance of spillages
- Only re-fuel machines at fuelling station, construct structures to trap fuel spills at fuelling station
- Immediately clean oil and fuel spills and dispose contaminated material (soil, etc.) at licensed sites only.
- A spill kit will be available on each site where activities are in progress.
- Provide mobile ablution facilities and take care that onsite sanitation facilities are well maintained and serviced regularly.
- Draw-up and strictly enforce procedures for the storage, handling and transport of different hazardous materials.
- Ensure that good housekeeping rules are applied.
- Oils and lubricants must be stored within sealed containment structures.
- Minimise storage of hazardous substances onsite
- Any mechanical equipment maintenance must be undertaken on drip trays or UPVC sheets to prevent spills/ leaks onto the soil.
- When not in use, a drip tray must be placed beneath mechanical equipment and vehicles.
- Ensure vehicles and equipment are in good working order and regularly inspected for leaks and drivers and operators are properly trained.
- Waste separation must be undertaken if practical for recycling.
- Waste materials generated on site must be stored in suitable lidded containers and removed off site to a suitable disposal facility.
- Drinking water to be obtained from legal source (Local Authority) and trucked onto site.
- No water will be abstracted in terms of section 21(a) of National Water Act, 1998 (Act no. 36 of 1998).
- Waste water (i.e., including storm water and grey water) must be kept separate from clean water.
- Separate clean and contaminated water systems around the pit and infrastructure areas.
- Establishing controlled runoff from laydown area and the flow and end destination of decontamination water will be controlled.
- Although erosion and runoff are natural processes it should be managed by maintaining topsoil in any areas not in use and maintaining maximum vegetation coverage.
- Slow storm water runoff with storm water diversion and erosion control contour berms

MITIGATION MEASURES Impact 3: Limited loss of Biodiversity – Natural Vegetation and Ecological Functioning

- Refer to Figure 3, which show the proposed area for mining and the existing tracks that will be used.
- The mining area is located on the boundary between a CBA 1 and CBA 2; however, the mining area is located within an area transformed by historic mining.
- All development areas must be clearly demarcated, and no activities may take place outside of demarcated areas.
- Limiting activities to the smallest area that is necessary.
- Remove alien invasive vegetation if required and ensure ongoing alien vegetation clearing in the area.
- No indigenous plants outside of the demarcated work areas may be damaged.
- Implement concurrent rehabilitation in terms of the annual rehabilitation plan.
- The noise and vibration caused by the earthmoving equipment will disturb smaller animals (e.g., snakes). These will move away whilst operations are in progress. Should any animals be encountered, these should be moved away if necessary.
- Vehicles speed must take into account the possibility of collisions with fauna.

MITIGATION MEASURES Impact 4: Visual Intrusion

- The construction areas shall be kept neat and tidy at all times.
- Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly.

MITIGATION MEASURES Impact 5: Emissions (Greenhouse Gases, Dust and Noise)

- The Applicant shall adhere to the local by-laws and regulations regarding the noise and associated hours of operation
- All mining activities will be limited to daylight hours during weekdays and no activities on Sundays and public holidays.
- Noise abatement equipment, such as mufflers on diesel engines, will be maintained in good condition.
- The Applicant shall limit noise levels (e.g., install and maintain silencers on machinery). The provisions of SANS 1200 A Sub clause 4.1 regarding “built-up” area shall apply to all areas within audible distance of residents whether in urban, peri-urban or rural areas.
- If intrusive noise levels are experienced by any person at any point, the source of the noise will be moved if practical, or it will be placed in an acoustic enclosure, or an acoustic barrier will be erected between the source and the recipient.
- Due to the remote location of the site, dust emissions are unlikely to be a source of nuisance; however, the site must be wetted if required.
- Hauling vehicles shall adhere to municipal and provincial traffic regulations including speed limits.
- Vehicles used on site for the construction related activities shall be maintained and in a good working condition so as to reduce emissions.
- Engines shall be turned off when the vehicle is temporarily parked or stationary for long periods.
- Stockpiles must be maintained (covered where necessary) to avoid wind erosion of the material.
- Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces.

MITIGATION MEASURES Impact 6: Potential for Heritage, Palaeontological & Cultural Impacts

- If any heritage or paleontological resources are discovered as a result of the mining activities, such activities will cease with immediate effect and a qualified archaeologist and or palaeontologist will be commissioned to assess their significance and determine appropriate mitigation measures.
- All personnel and contactors will be made aware of the locations of all identified resources and the necessity of avoiding them.
- A safe distance of at least 50 metres will be maintained between the identified resource and mining activities

MITIGATION MEASURES Impact 7: Job creation with Local and Regional Economic Spin-Offs

- Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling).
- All operations will be carried out under the guidance of strong, experienced manager with proven skills in public consultation and conflict resolution.
- There will be a strict requirement to treat local residents with respect and courtesy at all times.

ACTIVITY - Removal of ore, loading and hauling, waste generation and management	PHASE Operational	SIZE AND SCALE of disturbance Logistical facilities & movement area 1.0Ha Quarry Floor/Excavation including sidehill waste dump 3.0Ha Dispatch Yard/Sorting Area: 1.0Ha Total footprint is 5ha
COMPLIANCE WITH STANDARDS NEMA Section 2 Principles Environmental Authorisation	TIME PERIOD FOR IMPLEMENTATION OF MITIGATION MEASURES Start of activity and continuous as mining progresses over the site during construction period (site access and site establishment activities). Upon cessation of each activity where applicable. Immediately in the event of spills	
MITIGATION MEASURES Impact 1: Change in Topography <ul style="list-style-type: none"> • The focus of topographic rehabilitation may not be obvious at the time of mine planning and must be addressed as the mine develops and the Closure Plan must be reviewed periodically for continued relevance in the light of changed mine path or long-term plans. • Manage the risks associated with high wall stability and slope stability of the waste dump to ensure a safe post mining landscape without the requirement for long term monitoring and management. • During production no highwalls will be created by removing the outcrop in benches to increase stability. • Overall slope angle between 60° and 70° will fit in with the natural topography and due to the massive and competent nature of the ore body will still be stable. • Slope pit floor to prevent pooling of rainwater. • Regular inspections and audits will be used as management system to ensure compliance. • At final closure of the operation all remaining product from the demarcated stockpile will be restored to pits wherever possible to fill any remaining deep excavations if any. • 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. • The basic rehabilitation methodology will therefore strive to replicate the pre-mining topography, wherever possible, or at least not to increase overall slope gradients without emplacement of adequately designed erosion control or runoff diversion structures. 		

MITIGATION MEASURES Impact 2: Soil erosion & soil compaction

- After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff.
- Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces.
- Reasonable measures must be undertaken to ensure that any exposed areas are adequately protected against the wind and potential stormwater run-off.
- Stockpiles should ideally be located to create the least visual impact and must be maintained to avoid erosion of the material.
- Compacted areas that are not required for access shall be scarified after use during decommissioning and rehabilitation.
- The basic rehabilitation methodology will therefore strive to replicate the pre-mining topography, wherever possible, or at least not to increase overall slope gradients without emplacement of adequately designed erosion control or runoff diversion structures.
- Provision must also be made for efficient storm water control to prevent erosion of roadways.
- Soil erosion on haul roads is to be regularly monitored and repaired.

MITIGATION MEASURES Impact 3: Soil and Water Contamination & General Waste Management

- Implement and follow water saving procedures and methodologies.
- Draw-up and strictly enforce procedures for the storage, handling and transport of different hazardous materials
- Fuel storage must be contained in mobile bowsers and refuelling will be done with care to minimise the chance of spillages
- Only re-fuel machines at fuelling station, construct structures to trap fuel spills at fuelling station
- Immediately clean oil and fuel spills and dispose contaminated material (soil, etc.) at licensed sites only.
- A spill kit will be available on each site where activities are in progress.
- Take care that temporary onsite sanitation facilities are well maintained and serviced regularly.
- Ensure that good housekeeping rules are applied.
- Oils and lubricants must be stored within sealed containment structures.
- Minimise storage of hazardous substances onsite
- Any mechanical equipment maintenance must be undertaken on drip trays or UPVC sheets to prevent spills/ leaks onto the soil.
- When not in use, a drip tray must be placed beneath mechanical equipment and vehicles.
- Ensure vehicles and equipment are in good working order and regularly inspected for leaks and drivers and operators are properly trained.
- Waste materials generated on site must be stored in suitable lidded containers and removed off site to a suitable disposal facility.
- Provide mobile ablution facilities
- Although erosion and runoff are natural processes it should be managed by maintaining topsoil in any areas not in use and maintaining maximum vegetation coverage.
- Slow storm water runoff with storm water diversion and erosion control contour berms
- Separate clean and contaminated water systems around the pit and infrastructure areas.
- Stored overburden in the form of boulder rubble and other stone waste should not be left in piles and should be backfilled on a continuous basis as the quarry developed.
- Remove and stockpile topsoil from roads, building platforms and stockpile areas prior to construction for use to restore disturbed areas. To ensure long-term stability, the restored soil cover should attempt to mimic the pre-mining distribution of soil texture and thickness.
- Soil removal creates permanent impacts that can be mitigated through restoration of soil cover, although the significance of the impact remains high.

MITIGATION MEASURES Impact 3: Soil and Water Contamination & General Waste Management - Continue

- Remove and stockpile 300mm topsoil in berms or heaps less than 1,5m high and turn soil or re-use every six months. Do not use as permanent storm water control feature.
- Remove and stockpile topsoil from roads, building platforms and stockpile areas prior to construction for use to restore disturbed areas. To ensure long-term stability, the restored soil cover should attempt to mimic the pre-mining distribution of soil texture and thickness.
- Contaminated soil must be treated by first removing the source of contamination - removing the source of contamination should allow the system to recover without further clean-up required.
- Petrochemical spillages to be collected in a drip tray and drum to store excavated spill affected soil for disposal at a registered facility or onsite treatment.
- The most promising techniques for in on-site treatment involve bioremediation. Bioremediation involves the use of microorganisms to destroy hazardous contaminants.
- Any product stockpiles left or oversize builders must be removed and used to backfill excavations or to slope remaining high walls.
- Separation of wastes into classes will ensure that waste is disposed of safely and according to the correct procedure. In order to ensure that waste classes are kept in separate streams, communication will be passed on and people will be trained on the different waste classes.
- Domestic waste - Separated at source into recyclable products. These must then be removed and recycled by recognised contractors. (Note that the mine is responsible for the waste from cradle to grave).
- Biodegradable waste will be dumped in a landfill provided for onsite.
- Unwanted steel, sheet metal and equipment need to be stored in a demarcated salvage yard.
- Unwanted steel, sheet metal and equipment in the salvage yard will be sold or disposed of as scrap metal.
- All steel structures and reinforcing will be discarded or sold as scrap.
- All equipment and other items used during the mining operation needs to be removed from the site.
- Used oils / hydrocarbons fuels / liquids are to be collected in sealed containers (stored on concrete slabs) and removed from site for recycling by a reputable company.
- Clean out content of oil traps and dispose of waste at registered and purpose designed landfill sites.
- All temporary waste storage areas need to be cleaned out and waste removed.

MITIGATION MEASURES Impact 4: Limited loss of Biodiversity – Natural Vegetation and Ecological Functioning

- Refer to Figure 3, which show the proposed area for mining and the existing tracks that will be used.
- Mining will continue from an historic mining operation where little vegetation naturally occurs.
- All development areas must be clearly demarcated, and no activities may take place outside of demarcated areas.
- Limiting activities to the smallest area that is necessary.
- Remove alien invasive vegetation if required and ensure ongoing alien vegetation clearing in the area.
- No indigenous plants outside of the demarcated work areas may be damaged.
- Implement concurrent rehabilitation in terms of the annual rehabilitation plan
- The noise and vibration caused by the earthmoving equipment will disturb smaller animals (e.g., snakes). These will move away whilst operations are in progress. Should any animals be encountered, these should be moved away if necessary.
- Vehicles speed must take into account the possibility of collisions with fauna.

MITIGATION MEASURES Impact 5: Visual Intrusion

- The construction areas shall be kept neat and tidy at all times.
- Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly.
- Mitigation of the visual impact of the sidehill waste dump will include following the contours of the outcrop.

MITIGATION MEASURES Impact 6: Emissions (Greenhouse Gases, Dust and Noise)

- Health and safety equipment are required for workers.
- Vehicles used on site shall be maintained and in a good working condition so as to reduce emissions.
- Engines shall be turned off when the vehicle is temporarily parked or stationary for long periods.
- Due to the remote location of the site, dust emissions are unlikely to be a source of nuisance; however, the site must be wetted if required.
- Stockpiles must be maintained (covered where necessary) to avoid wind erosion of the material.
- Incremental clearing of ground cover should take place to avoid unnecessary exposed surfaces.
- Existing tracks will be used as haul roads and will only be upgraded to facilitate haul trucks by applying dust suppression and/or hardening compound such as Macadamite if necessary.
- On public roads the vehicles shall adhere to municipal and provincial traffic regulations including speed limits.
- A speed limit of 30km/hour will be displayed and enforced through a fining system. All vehicle drivers using the access road and entering the site will be informed of the speed limit.
- All mining activities will be limited to daylight hours during weekdays and no activities on Sundays and public holidays.
- Noise abatement equipment, such as mufflers on diesel engines, will be maintained in good condition.
- The Applicant shall limit noise levels (e.g., install and maintain silencers on machinery). The provisions of SANS 1200A Sub clause 4.1 regarding “built-up” area shall apply to all areas within audible distance of residents whether in urban, peri-urban or rural areas.
- If intrusive noise levels are experienced by any person at any point, the source of the noise will be moved if practical, or it will be placed in an acoustic enclosure, or an acoustic barrier will be erected between the source and the recipient.

MITIGATION MEASURES Impact 7: Potential for Heritage, Palaeontological & Cultural Impacts

- If any heritage or paleontological resources are discovered as a result of the mining activities, such activities will cease with immediate effect and a qualified person will be commissioned to assess their significance and determine appropriate mitigation measures.
- All personnel and contactors will be made aware of the locations of all identified resources and the necessity of avoiding them.
- A safe distance of at least 50 metres will be maintained between the identified resource and mining activities.

MITIGATION MEASURES Impact 8: Job creation with Local and Regional Economic Spin-Offs

- Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling).
- Any other mining companies operating legally will be listed as affected parties and consulted. Areas of operations will be demarcated and no overlapping will be allowed.
- All operations will be carried out under the guidance of strong, experienced manager with proven skills in public consultation and conflict resolution.
- There will be a strict requirement to treat local residents with respect and courtesy at all times.

ACTIVITY – Rehabilitation of mined and disturbed areas	PHASE Decommissioning	SIZE AND SCALE of disturbance Logistical facilities & movement area 0.5Ha Quarry Floor/Excavation 4.0Ha Dispatch Yard/Sorting Area: 0.5Ha Total footprint is 5ha
COMPLIANCE WITH STANDARDS NEMA Section 2 Principles Environmental Authorisation	TIME PERIOD FOR IMPLEMENTATION OF MITIGATION MEASURES Upon cessation of each activity where applicable. Mine closure	
MITIGATION MEASURES <ul style="list-style-type: none"> • Implementation of Final Rehabilitation, Decommissioning and Mine Closure Plan. • The focus of topographic rehabilitation may not be obvious at the time of mine planning and must be addressed as the mine develops and the Closure Plan must be reviewed periodically for continued relevance in the light of changed mine path or long-term plans. • Implementation of the tasks detailed under waste management to manage the risks associated with high wall stability of the quarry and slope stability of the waste dump will ensure a safe post mining landscape without the requirement for long term monitoring and management. Regular inspections and audits will be used as management system to ensure compliance. • At final closure of the operation all remaining product from the demarcated stockpile will be restored to pit wherever possible to reduce highwall height and provide surface for rehabilitation or used to fill any remaining deep excavations if any. • The infrastructure area will be screened for petrochemical spills and cleaned and waste from the temporary storage facility will be removed and the area cleaned. • The compacted salvage yard, lay down and movement areas will be screened for petrochemical spills and cleaned before it is ripped and levelled. • Redundant structures, buildings and civil foundations (down to one meter below surface for subsurface infrastructure) will be removed for use elsewhere or demolished and discarded. • All redundant infrastructure and services need to be demolished including ruins, buildings, foundations and footings. • Building rubble will be used as backfill in excavations or removed from site in the absence of excavations. • Remove all power and water supply installations not to be retained by landowner in terms of section 44 of the MPRDA. • Removing underground infrastructure to one meter below surface. • Excavations created by removing subsurface infrastructure needs to be filled, levelled and compacted. • Final walk through of complete mining lease area to ensure no mining related waste and of re-usable infrastructure remain on site. • As part of this phase training of personnel in the implementation of the Closure Plan will done and the • implementation of the environmental awareness plan will be an ongoing process. 		

22.5 Impact Management Outcomes

ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE	MITIGATION TYPE	STANDARD TO BE ACHIEVED
Site access	Disturbance of fauna and flora	Biodiversity	Construction	Remedy through restriction and rehabilitation	Impacts minimised and mitigated. End use objectives achieved through rehabilitation.
	Soil compaction and erosion	Soil resource		Control through monitoring and management	
Site establishment, including waste generation and management	Visibility	Visual intrusion	Construction	Control through monitoring and management	Impacts minimised and mitigated. End use objectives achieved through rehabilitation.
	Emissions (dust, noise & vehicles)	Noise & Air quality		Control through monitoring and management	
	Disturbance of fauna and flora	Biodiversity		Remedy through restriction and rehabilitation	
	Soil and water contamination, general waste management	Soil and water resource		Remedy through restriction and rehabilitation & control through monitoring and management	
	Destruction or loss of Heritage resources	Cultural and Heritage resources		Avoidance by relocation of activity if required. Refer to Annexure 3 – no mitigation required for project site assessed	
Removal of ore, loading and hauling, waste generation and management	Visibility	Visual	Operation	Control through monitoring and management	Impacts minimised and mitigated. End use objectives achieved through rehabilitation.
	Emissions (dust, noise & vehicles)	Noise & Air quality		Control through monitoring and management	
	Disturbance of fauna and flora	Biodiversity		Remedy through restriction and rehabilitation	
	Soil and water contamination, general waste management	Soil and water resource		Remedy through restriction and rehabilitation & control through monitoring and management	
	Destruction or loss of Heritage resources	Cultural and Heritage resources		Refer to Annexure 3 – no mitigation required for project site investigated.	Impact avoided
Removal of temporary infrastructure and site rehabilitation	Dust emissions (vehicle entrained dust)	Soil resource	Decommissioning	Control through monitoring and management	Impacts minimised and mitigated. End use objectives achieved through rehabilitation.
	Soil erosion due to slow recovery of vegetation	Soil resource & biodiversity		Remedy through restriction and rehabilitation & control through monitoring and management	

22.6 Impact Management Actions

ACTIVITY	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
Site access	Disturbance of fauna and flora Soil compaction and erosion	Remedy through restriction and rehabilitation Control through monitoring and management	Concurrently with site access activities	Remain within the ambit of the Annual Rehabilitation Plan and Environmental Authorisation
Site establishment, including waste generation and management	Visibility	Control through monitoring and management	Upon cessation of activity	
	Emissions (dust, noise & vehicles)			
	Disturbance of fauna and flora	Remedy through restriction and rehabilitation		
	Soil and water contamination, general waste management	Remedy through restriction and rehabilitation & control through monitoring and management		
	Destruction or loss of Heritage resources	Avoidance by relocation of activity if required		
Removal of ore, loading and hauling, waste generation and management	Visibility	Control through monitoring and management	Concurrently with mining activities Upon cessation of activity	
	Emissions (dust, noise & vehicles)	Control through monitoring and management		
	Disturbance of fauna and flora	Remedy through restriction and rehabilitation		
	Soil and water contamination, general waste management	Remedy through restriction and rehabilitation & control through monitoring and management		
	Destruction or loss of Heritage resources	Refer to Annexure 3 - none required.		
Removal of temporary infrastructure and site rehabilitation	Dust emissions (vehicle entrained dust)	Control through monitoring and management	Upon cessation of activity	Remain within the ambit of the Environmental Authorisation and Final Rehabilitation, Decommissioning and Closure Plan
	Soil erosion due to slow recovery of vegetation	Remedy through restriction and rehabilitation & control through monitoring and management		

23 Financial Provision

23.1 Describe the closure objectives and the extent to which they have been aligned to the baseline environment described under the Regulation.

- Objective 1 - To create a safe and healthy post-mining environment
 - Safe excavations
 - Slope stability of remaining excavation
 - No potentially dangerous areas secured if required
 - Limited residual environmental impact
 - Develop a landscape that reduces the requirement for long term monitoring and management
 - No surface and/or groundwater contamination
 - Waste management practices not creating or leaving legacies
- Objective 2 - To create a stable, free draining post mining landform, which is compatible with the surrounding landscape
 - Economically viable and sustainable land, as close as possible to its natural state.
 - Prepare area to promote natural re-establishment of vegetation that is self-sustaining, perpetual and provides a sustainable habitat for local fauna and successive flora species
 - Prevent long term changes in land use by implementing prompt rehabilitation and maintenance of disturbances when possible as part of annual rehabilitation plan.
 - Stable, free draining post mining landform
 - Prevent alteration or diverting natural drainage lines and reduced natural runoff.
 - Prevent concentration of runoff, mixing of clean runoff with contaminated runoff and creation of large open water bodies.
- Objective 3 – To provide optimal post-mining social opportunities
 - Optimised benefits for the social environment
 - Positive and transparent relationships with stakeholders and maintaining communication channels, providing stakeholders including government authorities with relevant information as per legislative requirements.
 - Undertaking environmental management according to approved EMP and Closure plans and regular auditing of the environmental management system.
 - Minimal negative aesthetic impact
 - Mitigate the nuisance effects of air emissions (dust), visual intrusion and the cumulative effect of a raise in the ambient noise levels
 - Prevent disturbance of archaeological sites and implement mitigating measures according to the archeological assessment.

23.2 Confirm specifically that the environmental objectives in relation to closure have been consulted with landowner and interested and affected parties.

The closure objectives were reported in the draft BAR as well as the Final Rehabilitation, decommissioning and mine closure plan and was made available to all registered interested and affected parties.

23.3 Rehabilitation plan that describes and shows the scale and aerial extent of the main mining activities

Refer Final Rehabilitation, decommissioning and mine closure plan **Annexure 1**.

23.4 Explain why it can be confirmed that the rehabilitation plan is compatible with the closure objectives.

The closure objectives are to return the land disturbed by mining activities back to its original condition. The rehabilitation plan provides the detail on how this will be achieved as detailed in **Annexure 1**.

23.5 Calculate and state the quantum of the financial provision required to manage and rehabilitate the environment in accordance with the applicable guideline

As per **Annexure 1**.

23.6 Confirm that the financial provision will be provided as determined.

As per **Annexure 1**.

23.7 Mechanisms for monitoring compliance with and performance assessment against the environmental management program and reporting thereon, including

SOURCE ACTIVITY	IMPACTS REQUIRING MONITORING PROGRAMMES	FUNCTIONAL REQUIREMENTS FOR MONITORING	ROLES AND RESPONSIBILITIES	MONITORING AND REPORTING FREQUENCY and TIME PERIODS FOR IMPLEMENTING IMPACT MANAGEMENT ACTIONS
All mining activities	All commitments contained in the BA Report and accompanying EMPr.	Ensure commitments made within the approved BAR and EMPr are being adhered to.	Site Manager and EAP.	Annual Undertake and submit an environmental performance audit to DMR
Site access and site establishment	Visual inspection of soil erosion and/or compaction	All exposed areas, access roads and soil stockpiles must be monitored for erosion on a regular basis, specifically after rainfall events.	Site Manager and Independent EAP	Weekly, and after rain-fall events Weekly monitoring reports to be signed-off by the Site Manager Corrective action to be confirmed and signed-off by the Site Manager. Consolidated monthly monitoring reports (including confirmation of corrective action taken, with photographic evidence) to be submitted to the Site Manager.
Open Pit Mining	Visual inspection of biodiversity impacts	Visual inspection of mining activities and other possible secondary impacts <ul style="list-style-type: none"> • Control and prevent the development of new access tracks. • Control and prevent growth of alien vegetation in cleared areas and on stockpiles. • Standard waste management practices must be implemented to prevent contamination and littering. • All spill incidents will be reported and corrective action taken in accordance with an established spill response procedure. 	Site Manager & Contractor (or sub-contractors)	Weekly monitoring reports to be signed-off by the Site Manager. Corrective action to be confirmed and signed-off by the Project Site Manager. Consolidated monthly monitoring reports (including confirmation of corrective action taken, with photographic evidence) to be submitted. Report incidents in terms of the relevant legislation, including the MPRDA, NWA and NEMA.
	Visual inspection of water resource functionality			
	Visual inspection of waste management, housekeeping and maintenance.			
Closure & Rehabilitation	Revegetation; Stability; Soil erosion; Alien invasive species	Inspection of all rehabilitated areas to assess whether soil erosion is occurring and to implement corrective action where required.	Site Manager	A final audit report for site closure must be submitted to the DMR for approval.

23.8 Indicate the frequency of the submission of the performance assessment/ environmental audit report.

An external environmental performance audit shall be conducted annually by an independent environmental assessment practitioner that include an annual rehabilitation plan for implementation during the next reporting period. A review of the Final decommissioning, rehabilitation and mine closure Plan will also be done on an annual basis together with an update of the quantum calculations for financial provision for rehabilitation.

24 Environmental Awareness Plan

24.1 Manner in which the applicant intends to inform his or her employees of any environmental risk which may result from their work.

Training is part of its Induction process and environmental Management System (EMS). The induction includes:

- Awareness training for contractors and employees;
- Job specific training – training for personnel performing tasks which could cause
- potentially significant environmental impacts;
- EMS training;
- Comprehensive training – on emergency response, spill management, etc;
- Specialised skills; and
- Training verification and record keeping

Before commencement of the mining activities all employees and contractors who are involved with such activities should attend relevant induction and training. It is standard practice for employees and the employees of contractors that will be working on a new project or at a new site to attend an induction course where the nature and characteristics of the project and the site are explained.

The training course should include key information abstracted from the EMP pertaining to the potential environmental impacts, the mitigation measures that will be applied, the monitoring activities that will be undertaken and the roles and responsibilities of contractors' and personnel.

The full EMP document is also made available to attendees.

24.2 Manner in which risks will be dealt with in order to avoid pollution or the degradation of the environment.

Environmental risks and how to manage them are dealt with in the induction course referred to in section (m) (i) above. If an incident of environmental pollution or damage does occur it is analysed and appropriate prevention and/or mitigation measures are developed. These measures are added to the EMP and conveyed to the relevant personnel.

All unplanned incidents with the potential to cause pollution or environmental degradation or conflict with local residents will be reported to the Mineral Resources Manager within 24 hours.

Hydrocarbon Spills

Hydrocarbon spills that are considered to be emergency incidents are large-scale spills (cover a surface area >1m²), resulting from situations such as; a leaking diesel bowser, an oil drum that is knocked over, large spillages from equipment, etc.

Activities that are involved in the clean-up of such instances include:

- The containment of the spill,
- The removal of all contaminated material, and
- The disposal (at a licenced hazardous disposal facility) or bioremediation (at a licenced facility) of this material.

Fire

There is the potential for fire to occur in the following locations of the drill site:

- Veld fires across vegetated areas; and
- Vehicles and equipment.

Veld fires: Any person who observes the fire must report it to the fire brigade immediately and then to their supervisor. If possible, additional personnel may be sent to contain the fire, but only if the lives of the personnel will not be endangered.

Vehicles and Equipment: Fire extinguishers will be available at the site where drilling activities will take place and in the vehicles. All staff members will be trained in the use of fire-fighting equipment.

25 Specific information required by the Competent Authority

(Among others, confirm that the financial provision will be reviewed annually).

Not applicable at this stage

26 Undertaking

The EAP herewith confirms the correctness of the information provided in the reports, the inclusion of comments and inputs from stakeholders and I&As, the inclusion of inputs and recommendations from the specialist reports where relevant; and that the information provided by the EAP to interested and affected parties and any responses by the EAP to comments or inputs made by interested and affected parties are correctly reflected herein.



N.J. van Zyl

Signature of the environmental assessment practitioner:

Name of company: Private Enterprise

July 2021

Date:

-END-

Appendix 1: Final Rehabilitation, decommissioning and mine closure plan and quantum calculations

Appendix 2: Public Participation Process only with final BAR

Appendix 3: Heritage Impact Assessment