Annexure 1: Final Rehabilitation, decommissioning and mine closure plan
Including Environmental Risk Assesment

Kgalagadi Sout (Pty) Ltd
Farm Konga 250
Reference NC30/5/1/3/2/10928MP

Contends

1 INTRODUCTION

This document serves to comply with regulation 6 of the NEMA Financial Regulations (2015) that states that 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, as reflected in an environmental risk assessment report.

1.1 The annual rehabilitation plan

The annual rehabilitation plan provide for concurrent or progressive rehabilitation and contain information that defines activities on an annual basis and how these relate to the Final closure vision, as detailed in this final rehabilitation, decommissioning and mine closure plan.

The objective of the annual rehabilitation plan is to─

- review concurrent rehabilitation and remediation activities already implemented;
- establish rehabilitation and remediation goals and outcomes for the forthcoming 12 months, which contribute to the gradual achievement of the post-mining land use, closure vision and objectives identified in the holder's final rehabilitation, decommissioning and mine closure plan;
- establish a plan, schedule and budget for rehabilitation for the forthcoming 12 months;
- identify and address shortcomings experienced in the preceding 12 months of rehabilitation; and
- evaluate and update the cost of rehabilitation for the 12 month period and for closure, for purposes of supplementing the financial provision guarantee or other financial provision instrument.

Taking into acount the objective of the annual rehabilitation plan it is clear that it cannot form part of the environmental management programme to be submitted in terms of section 24N of the Act and the Environmental Impact Assessment Regulations, 2014 but will be submitted on an annual basis as part of the environmental audit report in terms of Regulation 34 (1)(b) of the NEMA EIA Regulations (2014).

1.2 Final rehabilitation, decommissioning and mine closure plan

According to the NEMA Financial Regulations the final rehabilitation, decommissioning and mine closure plan will form a component of the environmental management programme to be submitted in terms of section 24N of the Act and the Environmental Impact Assessment Regulations, 2014 and will be subjected to the same requirements of the environmental management programme with regards opportunities for stakeholder review and comment as well as auditing.

The objectives of this final rehabilitation, decommissioning and mine closure plan is to to identify a post-mining land use that is feasible through-

- providing the vision (goals), objectives, targets and criteria for final rehabilitation, decommissioning and closure of the project;
- outlining the design principles for closure;
- explaining the risk assessment approach and outcomes and link closure activities to risk rehabilitation;

- detailing the closure actions that clearly indicate the measures that will be taken to mitigate and/or manage identified risks and describes the nature of residual risks that will need to be monitored and managed post closure;
- committing to a schedule, budget, roles and responsibilities for final rehabilitation, decommissioning and closure of each relevant activity or item of infrastructure;
- identifying knowledge gaps and how these will be addressed and filled;
- detailing the full closure costs for the life of project at increasing levels of accuracy as the project develops and approaches closure in line with the final land use proposed; and
- outlining monitoring, auditing and reporting requirements.

1.3 Environmental risk assessment report

According to the NEMA Financial Regulations the environmental risk assessment report will also form a component of the environmental management programme to be submitted in terms of section 24N of the Act and the Environmental Impact Assessment Regulations, 2014 and will be subjected to the same requirements of the environmental management programme with regards opportunities for stakeholder review and comment as well as auditing.
The objective of the environmental risk assessment report is to─

- ensure timeous risk reduction through appropriate interventions;
- identify and quantify the potential latent environmental risks related to post closure;
- detail the approach to managing the risks;
- quantify the potential liabilities associated with the management of the risks; and
- outline monitoring, auditing and reporting requirements.

This document then fulfill the requirements of both the Final rehabilitation, decommissioning and mine closure plan and the Environmental risk assessment report

1.4 Issues that have guided the development of the plan

Three approaches were employed to identify the key aims for the closure process:

- Technical assessments which involved the recording of the project activities over the full life cycle of the mining operation (including closure) and the consequent potential impacts on the environment (including cumulative impacts). This resulted in the compilation of a draft closure plan that facilitated discussions with the authorities as well as Interested and Affected Parties (I&APs).
- Identification and consultation with the relevant authorities to record their requirements as well as public meetings with I&APs to solicit/record their suggestions/issues/concerns.
- The collection of available/published environmental data, the review thereof for adequacy and hence the identification of the need for more comprehensive environmental studies/investigations and/or further information gathering.

As a result of the consultation and recommendations from the basic assessment report and EMPr completed the company identified three key closure goals for the final closure of the mining operation that are listed below.

- To create a safe and healthy post-mining environment with no residual environmental impact.
- To create a stable, free draining post mining landform, which is compatible with the surrounding landscape and which is capable of a productive land use that achieves a land capability equal to that of pre-mining conditions
- To provide optimal post-mining social opportunities

Each goal is supported by a suite of key objectives and activities which are elaborated on in section 3 of this report. This report also describes how these objectives are planned to be met and elaborate on the implementation of certain risk mitigation actions (section 5). With risk assessment and mitigation being integral to the planning and executing of the rehabilitation and closure of the mine. Aftercare and maintenance of rehabilitated sites is often the difference between the ultimate successes or failure of rehabilitation and monitoring of rehabilitation will determine whether rehabilitation objectives and requirements are being achieved.
This report fulfils the requirements of both the Final Rehabilitation, Decommissioning and Mine Closure Plan and the Environmental Risk Assessment Report required in terms of the NEMA (Act 107 of 1998) regulations and applicable MPRDA (Act No. 28 of 2002) regulations.
Several pieces of legislation are applicable to mine closure. Importantly, public participation is an integral part of mine closure and the process followed needs to fulfil the requirements of all relevant legislation. The following government departments have been identified amongst others as playing a key role in the closure process:

- Department of Minerals Resources (DMR). Lead agent, facilitator of closure inspections and issues the closure certificate,
- Department of Water and Sanitation (DWAS). Lead agent for potential water related issues and signs off on the mine closure certificate. Cancellation of Water Use license.
- Provincial Department of Environment and Nature Conservation. Gives input into the closure plan and guides and monitors protection of the natural environment.

The local municipality and district municipality. Gives input into the mine closure plan and interfacing thereof with their integrated development plan (IDP) of the local area.

2 CONTEXT OF THE MINING OPERATION

2.1 Mining Permit

The proposed Mining Area is located on a 5Ha of the Remainder of Farm Konga 250 situated in the Z F Mgcawu District Municipality and Dawid Kruiper Local Municipality of the Northern Cape Province in extend 10958.4533Ha.

The property is registered in the name of Rooipan Landgoed (Pty) Ltd by virtue of Title deed T2288/1981 filed in the Vryburg Deeds Office. LPI Code C02800000000025000000.

The mining area is located approximately 69.5 Km South of Askham on the R360 and existing Farm Roads and 125 Km North of Upington on the R360 and existing Farm Roads.
The mine is situated off the R360 main road about 125 km north of Upington and 69.5 Km South of Askham in the Kalahari region of Gordonia district, Northern Cape Province within the jurisdiction of the local authority of the ZF Mgcawu District Municipality.

Refer to the layout plans in the BAR that shows the properties and co-ordinates with access routes.

2.2 Project Description

2.2.1 Mine design map

The mineral mined is salt, a clear, brittle mineral that contains the elements of sodium and chlorine. Its chemical formula is NaCl; its mineral name is halite. Salt forms clear, cube-shaped crystals. Impurities can cause salt to appear white, gray, yellow, or red.
All salt deposits began as salty water; brine from seas, oceans, and salt pans. South Africa's salt resources are confined to underground brines associated with inland saltpans, coastal saltpans and seawater. The majority of inland pans lie on rocks of the Karoo Sequence, in a

curved belt between 50 and 60 km wide, extending from near Vryburg in the North-West Province to Hopetown on the eastern border of the Northern Cape, continuing westwards past Brandvlei. Most of the pans have formed on shales of the Dwyka and Ecca Groups, which, in that area, were deposited under marine conditions.

The salt deposit on the Farm Konga is an underground deposit of halite or rock salt, to be mined by solution mining. The Konga Pan is located along ancient drainage systems one of a considerable number of large saltpans found in the Kalahari region to the north of Upington. The salt obtained from the pans underlain by the Dwyka Group rocks has a relatively high sodium sulphate content, this probably results from the oxidation of iron sulphate to sulphate.

The actual mining of salt only involves the pumping of the underground brine onto crystallisation pans and the harvesting of salt after crystal growth from where it is sold as a Free on Truck (FoT) product. The salt is formed by the process of evaporation and no waste is created. The coarse salt crystals are then harvested and stockpiled to dry from where it is sold. Transport to and the processing plants where it is refined, packaged and distributed does not form part of the mining operation.

2.2.2 Project layout

Construction Phase:

All infrastructure will be available outside the pan floor located at the farmstead that serve as company HQ with buildings and services and associated infrastructure including, water and electricity supply, accommodation and domestic and industrial waste management facilities, salvage yard, service/wash bay. As all of the surface infrastructure is in place the development footprint will not expand any further with only the necessary maintenance being done.

All infrastructure was developed as part of farm improvements and the infrastructure area including access and service roads will therefore remain after mine closure in terms of section 44 of the MPRDA.

- Access and service roads:

Access to the mine works will be via the R360 between Upington and Askam and existing farm tracks. Service roads were constructed by upgrading existing farm tracks (fire break) and will remain the same over the life of the mine and no new roads will be developed. No haul roads will be necessary as the production of salt is taking place in one concentrated footprint.

- Water supply:

Although groundwater is use it cannot be seen as process water. Salt mining involve the pumping of brine from boreholes for the production of salt by means of solar evaporation. Annual abstraction required approximately 163840 m^3. Most of this is abstracted when the pans are filled (8000m^3 five times per year) and relatively little groundwater is abstracted to top up the pans (16 m^3/day)

A General Authorization from DWAS is required for in terms of Sec 21for altering bed, bank and characteristics (Sec21c), diverting the flow (Sec21i) and taking of water from a of a water source (Sec21a). Potable water will be obtained from the farm and stored in a 2500l plastic tank.

- Electricity supply:

Electricity is only required for the submersible pumps and will be supplied by solar power or diesel powered gensets provided with spill prevention measures.

- Logistics:

No infrastructure is present or will be required due to the small scale and simple mining method. Logistics is available in the farmstead that will serve as company HQ. The product stockpile platforms to be developed as part of the mining area will also serve as parking area

and laydown area. Secure storage for stores and equipment will be provided in the form of mobile containers and ablutions will also consist of mobile units.

- Domestic Waste Management

Domestic waste (lunch wrappers, containers, food tins, bottles) of daily workers will be collected in municipal refuse bags, sealed in plastic containers and transported weekly to the Upington or Askam solid waste disposal site. Waste collection drums will be provided at strategic points. Demarcate an area at the company HQ (farmstead) for construction of a "temporary waste storage area" for temporary collection and storage of the drums, prior to delivery to the solid waste disposal site for disposal. (On-site dumping/burial is not allowed).

- Industrial Waste Management

Identify and demarcate (by fences) the following sites at the farmstead (Company HQ):

- 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 workshop with temporary storage area for all used lubrication products and other hazardous chemicals, bunded fuel storage and wash bay.

The wash bay must be provided with oil traps from which oil can be bailed out.
A concrete platform fenced 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 from servicing of vehicles must be collected in the facility for collection by a waste oil recycling company.
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.
Drip trays or PVC facility needs to be used when servicing equipment on site to prevent any oil spills. Al moving equipment needs to be equipped with permanent drip trays to prevent oil spills.
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.

- Diesel and Lubricant Handling Program:

Identify area for citing of diesel bulk tank at the farmstead (Company HQ) to receive fuel from the delivery tanker truck. Provide tank with bund wall and apron. Refueling either of equipment or of the mobile trailer bowser from the diesel bulk tank 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.
Instruct the staff in the reasons for good fuel management and the alternative consequences.

Operational Phase

Salt mining is characteristically conducted in an unconventional manner in that no rock is broken or excavations created in the mining process. Topsoil management a critical part of other mining operations is therefore not applicable to salt mining and no fine residue or overburden waste dumps are created as the mining of salt do not produce any overburden or waste rock.
The pan identified for mining has already been disturbed by historic salt mining operations and salt mining on this property has been done for more than 30 years. The mining area will consist of the crystallisation pans, bore holes, electricity supply, stockpile platforms and laydown area.
In the case of inland pans, salt production consists of the pumping of brine into evaporation (concentration) ponds and from there into crystallisation pans where salt can crystallize through

evaporation. This operation does not make use of concentration ponds and the brine is delivered via a pipeline from the pumps directly to the different crystallisation pans.
The loose scree material on the pan floor is removed to form a ±300mm bund wall to prevent storm water from flooding the crystallisation pans as freshwater can ruin the production. Brine is then pumped into these crystallisation pans over a period of one year to form a level hardened floor on which salt can crystallize. The first salt to be produced is used to build platforms around the pans. When the pans are in full production these platforms are used for stockpiling the salt until it is dry.
It is estimated that salt harvesting will only start from year 2 and salt is harvested when crystals are about 50 mm thick producing about 350 tons every 6 weeks during summer months on a 1 Ha crystallisation pan. On average 5 harvests take place per year. In the summer (September to April) months production rates are at the optimum level and during the winter (May to August) the salt pans go into a resting period where no salt is being produced. During this resting period the annual rehabilitation plan will be implemented and available surface disturbances will be rehabilitated during the resting periods.
This operation will start as small scale mining with the surface area of the crystallisation pans at 5Ha. As part of this mining operation the optimal size in relation to available water will be determined and therefore the mine plan or development footprint will possibly expand as part of an application for a mining right. No structures will be affected by blasting as no blasting takes place in the mining process and no subsidence will ever occur given that only surface mining is taking place.
A total of 4 crystallisation pans will be developed and the development footprint will not expand any further with only the necessary maintenance being done. Depending on quality and quantity of available underground brine there is a possibility that the operation will expand but then an application for a mining right will be lodged and the information obtained during this mining operation will be used for the development of a resource statement as well as for the mine financial model.
During this small-scale mining operation mining of salt involves:

- the development of the 4 crystallisation pans with adjacent stockpile platforms raised 300mm above natural pan floor
- the pumping of the underground brine onto crystallisation pans average 80cm deep to form a hardened surfaces on which crystal growth occurs
- the average depth of boreholes is 60 meters but brine is pumped at a depth of 30 meters
- the preparation of the pan floor is critical to prevent brine seepage and to allow for movement of harvesting equipment without breaking the pan floor
- with the use of waste or low-grade salt from other mining operation the mininmum period required to develop the hardened pan floor and stockpile platforms will be 1 year

Limited equipment is used in the mining process and include:

- Electric pumps driven by solar power for pumping of brine to crystallisation pans
- Tractor with harrow to loosen salt after crystal growth
- Tractor with front and back scraper for harvesting of salt
- Front end loader for loading
- Dump trucks for transport between crystallisation pans and stockpile platforms

Decommissioning and Closure Phase

- The decommissioning and closure phase at the end of the life of the mine will consist of implementing this Final Rehabilitation, Decommissioning and Closure Plan.

3 REGULATORY REQUIREMENTS

3.1 Environmental Authorisation (EMPr) requirements

The requirement as per the approved Environmental Authorisation (EA) is that after mining, the site must be rehabilitated to its original land use, small stock farming (grazing). The key closure objective 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 to ensure that the rehabilitation measures prove successful. The aim is to ensure a stable environment 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.

This key closure objective is divided in three closure objectives as stated below.

- Objective 1 - To create a safe and rehabilitated post-mining environment
  - ➢ Safe mining area (Bore holes caped and no potentially dangerous areas like evaporation ponds)
  - Maintaining the affected environment in a stable condition that will not be detrimental to the safety and health of humans and animals.
  - The crystallisation pans are be shaped and levelled at each stage of closure and rehabilitation.
  - Promote re-vegetation of with natural vegetation.
  - Minimise risk of erosion from either increased base flow or mining operations followed by prompt rehabilitation and maintenance of erosion events.
  - ➢ Limited residual environmental impact (No surface and/or groundwater contamination, waste management practices not creating or leaving legacies with a post mining landscape that reduces the requirement for long term monitoring and management)
  - No waste in the form of dumps or structures will remain on surface after mine closure
  - No development of infrastructure and services will take place and facilities at the company headquarters will be used. Existing farm roads must be used for mining.
  - Unwanted steel, sheet metal and equipment need to be removed from the mining area on a daily basis and no salvage yard will be established.
  - No temporary storage area for used lubrication products and other hazardous chemicals will be developed and waste must be disposed of at a collection point at the company headquarters on a daily basis.
  - Equipment used in the mining process will be adequately maintained in the workshops available at the company headquarters so that during operations it does not spill oil, diesel, fuel, or hydraulic fluid.
  - Accidental petro-chemical spills if any must be cleaned up immediately by removing the spillage together with the polluted soil (salt).
- Objective 2 - To create a stable, free draining post mining landform, which is compatible with the surrounding landscape and which is capable of a productive land use that achieves a land capability equal to that of pre-mining conditions
  - ➢ Prevent long term changes in land use: revert back to mainly small stock farming (grazing).
  - Topsoil must be removed from virgin areas to be disturbed and vegetation cleared, keeping disturbance to the native vegetation to an absolute minimum.
  - Any topsoil removed from stockpile area must be stored separately for later reuse.
  - Topsoil borrowing from the virgin areas to cover disturbed areas will not take place.
  - All topsoil which is removed prior to any activity will be stockpiled in berms (no higher than 2m) along with its resident seed bank and vegetation cover to an area above the proposed development.
  - This berm will then serve a storm water control function in the unlikely event of surface water run-off.

- Movement of vehicles will be restricted to demarcated areas so as to keep the footprint of the mining operation to the absolute minimum.
- Movement of equipment must be restricted to existing roads and no ad hoc driving or turning outside demarcated loading and hauling areas will be allowed.
- All equipment and other items used during the mining operation needs to be removed from the site at final closure.
- All compacted areas due to stockpiling, loading and hauling will be ripped with erosion control measures.
- All stockpiles and leftover product must be removed or used to backfill the excavations
- Minimise the loss of land with agricultural potential: minimize footprint of disturbances to facilitate recovery of degrading patches into active patches through colonization of the patch by dispersing species (patch dynamics)
- Minimising footprint of disturbed areas including stockpile platforms and loading and hauling areas.
- Minimise loss of vegetation within the disturbance footprint: scarifying of all compacted areas as soon as possible for natural plant succession.
- Minimise disturbance of ecology due to loss of habitat and noise/visual/dust

➢ Ensuring the hydrological integrity of the pan.

- Preventing attenuating or diverting any of the natural flow.
- Maintaining bank stability to be able to withstand high flow conditions.
- Prevent canalisation of the flow that can lead to scouring or erosion.
- Levelling of the pan floor to prevent impeding and damming.

➢ Limit residual environmental impact with no surface water or soil contamination by ensuring that no fuel or oil spills occur in the mining area.

- Ensure that no solid waste or rubble is dumped on the site.
- Ensure that portable toilets are used.

➢ Provide sufficient information and guidance to plan the mining activities in a manner that would reduce impacts as far as practically possible.

- Objective 3 – To provide optimal post-mining social opportunities

➢ Optimised benefits for the social environment

- Maintain positive and transparent relationships with stakeholders and maintaining communication channels.
- Provide stakeholders including government authorities with relevant information as per legislative requirements.
- Undertaking environmental management in accordance with the approved EMP and Closure Plan.
- Ensure that workers remain within the mining permit area.

➢ Minimal negative aesthetic impact

- Minimise visual disturbance: implementation of mitigating measures from the public road views.
- Waste material of any description, including receptacles, scrap, rubble and tyres, must be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.
- Minimise noise disturbance: limiting earth moving to day time.
- Management of air emissions to minimise nuisance effects or health risk; implementation and maintenance of dust monitoring programs accompanied by dust suppression activities by spraying water and/or dust-allaying agents.
- Prevent long term changes in land use: revert back to grazing land where possible
- Respond rapidly to any complaints received.

4 BASIC REHABILITATION METHODOLOGY

Concurrent or progressive rehabilitation is good practice and has advantages for the company as it reduces its overall financial exposure. Concurrent rehabilitation and remediation are provided for in the annual rehabilitation plan and contain information that defines activities on an annual basis and how these relate to the Final closure vision, as detailed in this final rehabilitation, decommissioning and mine closure plan.

Annual reviews in terms of regulations 6(a) and 11(1)(a) of the NEMA Financial Regulations, that form part of the Annual Environmental Audit, assesses what closure objectives and criteria are being achieved through the implementation of the plan.

Areas that are not covered during concurrent rehabilitation as described in the Annual rehabilitation plan that require specific intervention as part of this final rehabilitation, decommissioning and mine closure plan are discussed below.

4.1 Mining area

The **post closure objective** is to restore the land where active mining has taken place to its pre-mining carrying capacity for stock farming taking into account the absence of vegetation within the salt pan therefore re-vegetation of the disturbed areas is not an option. Although the post mining land use will be grazing the landform will be an active salt pan. 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. Access control and fencing will be maintained until a closure certificate is issued by the DMR

The **basic rehabilitation methodology** will therefore only include reinstating the original profile of the pan floor and ensuring the hydrological integrity of the pan. This will be achieved by leaving the wetland (pan) even, and in a natural state containing no foreign debris or other materials. All scrap and other foreign materials will be removed from the area and disposed of as in the case of other refuse, whether these accrue directly from the mining operation or are brought on to the site. The access points to the pan form part of an existing farm track (fire break) and will remain after final decommissioning.

Post mining topography will follow the original landform shape. Salt mining do not produce any overburden or waste rock and no residue deposits will be created.

The infrastructure and associated buildings and services will involve the identification of the infrastructure required by the landowner. The general approach adopted is to reuse all infrastructures and equipment either at another location by the company or at the same location as part of farm improvement. 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 steel structures and reinforcing will be discarded or sold as scrap.

The compacted movement areas will be screened for petrochemical spills and cleaned before it is ripped and leveled. All redundant water pipes, pumps, power lines and cable associated with raw water supply not to remain for use by the landowner will be removed. Service roads needs to be maintained and handed over to the landowner in a good state of repair and all redundant fences needs to be removed and the boundary fence and gates repaired.

All temporary waste storage areas need to be cleaned out and waste removed. Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the complete mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.

4.2 Infrastructure area

The main **post closure objective** for the infrastructure area 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. Access control and fencing will be maintained until a closure certificate is issued by the DMR

The **basic rehabilitation methodology** for the infrastructure area and associated buildings and services will involve the identification of the infrastructure required by the landowner. The general approach adopted is to reuse all infrastructures and equipment either at another location by the company or at the same location for farming activities. The majority of the infrastructure in and around the infrastructure area will remain as part of farm improvement. 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 steel structures and reinforcing will be discarded or sold as scrap. Building rubble will be removed to the waste disposal site of the local authority due to the absence of excavations in the mining process. The compacted lay down and movement areas will remain as part of the farmstead but the area will be screened for petrochemical spills and cleaned. The demarcation fences will remain as a boundary for the farmstead and the fenced area will not be restored to grazing as per agreement with the landowner.

All redundant water pipes, pumps, power lines and cable, at the residential area and associated raw water supply not to remain for use by the landowner will be removed. Service roads needs to be maintained and handed over to the landowner in a good state of repair and all redundant fences needs to be removed and gates repaired.

All temporary waste storage areas need to be cleaned out and removed. Waste material of any description, including receptacles, scrap, rubble and tyres, will be removed entirely from the complete mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.

4.3 Aftercare and Maintenance

Maintenance of rehabilitated sites is often the difference between the ultimate successes or failure of rehabilitation and monitoring of rehabilitation will determine whether rehabilitation objectives and requirements are being achieved.

As the final phase in the project cycle, decommissioning may present positive environmental opportunities associated with the return of the land for alternative use and the cessation of impacts associated with operational activities. However, depending on the nature of the operational activity, the need to manage risks and potential residual impacts may remain well after operations have ceased. Examples of potential residual impacts and risks include erosion, slow recovery of vegetation, stock that has been abandoned (e.g., oil drums, scrap equipment) and old (unserviceable) structures.

The main closure objective is to hand back the rehabilitated properties to the respective landowners in a state that is fit for grazing, as close as possible to the original carrying capacity and 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 rehabilitation strategy is based on reinstating the original profile of the landscape and prepare the area for natural re-vegetation. The aim 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. Due to the specific nature of the

mining operation no aftercare and maintenance were identified except for monitoring of erosion event over a period of 2 years.

5 RISK ASSESSMENT

Identified risk with their potential impacts are assessed in terms of: nature (character status); extent (spatial scale); duration (time scale); probability (likelihood) of occurring; reversibility of the impact; the degree to which the impact may cause irreplaceable loss of resources; the significance (size or magnitude scale) prior to mitigation; the degree to which the impact can be mitigated; and, the significance (size or magnitude scale) after mitigation as per the criteria provided in the Environmental Authorisation (EA).

The impact rating and mitigation actions of each risk are also addressed in the in the Environmental Authorisation (EA).

Any unforeseen risks and related impacts with their associated mitigating actions will be included as part of this Final Rehabilitation, decommissioning and mine closure plan during the annual environmental assessment and reviews.

5.1 Risk sources

The risk sources within the active mining area with quantification are provided below.

- Processing plant and related structures

In the mining of salt, no processing is required as the salt harvested from the crystallisation pans are sold as a tree on truck (FoT) product.

- Infrastructure

No steel or reinforced concrete buildings and structures are present on the mining area that will require demolition. Services and associated infrastructure are limited to the bore holes for process water supply that are fitted with submersible pumps. Underground water reticulation is laid-on to the mine work area to feed water from the pumps to the crystallisation pans.

No electricity is used on the mine except for the water pumps. Solar power and/or Generator are provided for power supply. The service roads will remain as part of farm improvement and the mine is only responsible for the maintenance of the road.

- Opencast workings (including final voids and ramps)

Salt mining is making used of crystallization/evaporation pans that cannot be regarded as open cast workings therefore all earth moving (mining) related activities are discussed as part of surface disturbances below.

- Underground workings

Not applicable as there are no underground workings. The only activity that can be regarded as underground workings is the drilling of boreholes for the pumping of brine.

- Residue deposits overburden and spoils

No mine waste or fine residue or overburden are produces during salt mining operations. The only spoils are low grade salt produced during maintenance of the evaporation pans. This salt is used to maintain the stockpile platforms.

- Surface disturbance

Active mining (surface disturbance including services) only takes place on a 5Ha portion of the pan. The total footprint of the active crystallisation pans is 4Ha and together with the stockpile platforms the total compacted area is 5 Ha. The loose scree material on the pan floor will be used to form a bund wall of 300mm to prevent storm water from flooding the ponds as freshwater can ruin the production. No concentration ponds will be developed and brine is pumped directly into a series of shallow average 80 cm deep crystallisation pans where solar evaporation takes place.

The risk sources within the infrastructure area with quantification are provided below.

- The only permanent building is the workshop with secure storage area.
- An above ground fuel tank with service apron also forms part of the workshop.
- As part of waste management facilities, a salvage yard and wash bay are provided.
- The service roads will remain as part of farm improvement and the mine is only responsible for the maintenance of the road.

5.2 Risk Identification

- Risks with regard to creating a Safe mining area
  - Affected environment not in a stable condition can be detrimental to the safety and health of humans and animals.
  - Collapsing slope(s) of evaporation (collection) pond or crystallisation pans.
  - Potentially dangerous areas like collection ponds and uncapped bore holes.
  - Potentially dangerous areas like unstable ruins.
  - Unsafe erosion gulley's
  - Potentially dangerous areas like unstable ruins.
  - Uncontrolled access to a potentially unsafe post-mining area
- Risk of residual environmental impact
  - 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. Power supply and water installations including pumps and pipelines except for potable water.
  - Unwanted ruins, buildings, foundations, footings not demolished or rubble left behind due to the absence of excavations in the mining process.
  - Equipment and other items used during the mining operation left behind.
  - Incomplete removal of re-usable infrastructure.
  - Infrastructure to remain in terms of agreements with the landowner not maintained.
  - Waste classes not kept in separate streams
  - Incomplete removal of waste
  - Stockpiles and leftover product left behind
- Risks with regard to changes in land use
  - Uncontrolled expansion of mining footprint by not restricting the area disturbed by mining and the associated activities/infrastructure - loss of land with agricultural potential
  - Post mining topography not compatible with original landform. Since the pan surface was raised for the development of bund walls around the crystallisation pans final landscape will result in an undulating topography.
  - Unstable post mining landform, which is not compatible with the surrounding landscape and which is capable of an unproductive land use that cannot achieve a land capability equal to that of pre mining conditions
  - Long term changes in land use that cannot revert back to mainly small stock farming (grazing) caused by not implementing prompt rehabilitation and maintenance of disturbances when possible.
  - Disturbance of ecology due to loss of habitat.
  - Compacted areas due to loading and hauling left behind including the harden pan floors and stock pile platforms - limiting agricultural potential.
  - Uncontrolled expansion of movement areas

- Uncontrolled development of roads and new roads not kept to a minimum - existing farm roads not used for mining operations. Redundant internal roads left behind.
- Duel used roads still needed by the landowner and fences not maintained or repaired.

- Risks with regard to hydrological integrity of the pan
  - Hydrological integrity of the pan disrupted with increased risk of erosion from either increased base flow or mining operations.
  - Surface and/or groundwater contamination washing water ending up in ground water sources
  - Post-mining surface water quantities unsatisfactorily more/less than pre-mining or change in flow patterns
  - Original profile of the pan floor not reinstated creating impeding and damming of inflow into the pan.
  - Oil, fuel and lubricant spills during mining or demolition activities
  - Erosion sediment polluting water sources
  - Higher erodibility of profiled areas
- Risks with regard to benefits for the social environment
  - Staff losing their jobs and job losses of secondary industries, businesses and contractors
  - Contractual agreements with service providers surpassing 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
  - No positive and transparent relationships with stakeholders and not maintaining communication channels – 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.
  - Mine closure stalled due to non-compliance with South African legislation (national, provincial and local)
  - Insufficient funds for complete rehabilitation
- Risks with regard to aesthetic impact
  - Visual disturbance from the public road views - infrastructure remaining blocking the view
  - Incomplete removal of waste - waste classes not kept in separate streams
  - Nuisance effects of air emissions (dust) no implementation and maintenance of dust monitoring programs accompanied by dust suppression activities if required.
  - Noise disturbance and light pollution as a result of night activities.
  - Disturbance of archaeological sites not implementing mitigating measures according to the archeological assessment.

5.3 Risk Mitigation and Closure objectives

Internationally, there seem to be three schools of thought:

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

The thought process for the closure of this operation is based on the last two. In addition to the goals and objectives for final decommissioning and mine closure the vision for the post closure land form 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 vision 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 and that the aesthetic value of the area will be reinstated.
To meet the objectives the risk management strategies and impact mitigating measures described in the EMPr needs to implemented, monitored and evaluated. The closure process involves a series of actions, executed over a number of years as indicated in the annual rehabilitation plans, with continual monitoring, review and remedial actions (if required). Identified and assessed risks feed into mitigation actions (or primary tasks) of which successful implementation result in achievement of the mine closure goals and objectives.
Financial provision is made in section 6 to deal with these mitigating measures in case of temporary closure or sudden closure during the normal operation of the project or at final planned closure.

5.3.1 Create a safe and healthy post-mining environment

The only mitigating measure that needs to be implemented to create a safe post mining landscape without the requirement for long term monitoring and management is to profile and level the disturbed areas and restore the original profile of the pan floor as discussed as part of mitigating measures for a stable, free draining post mining landform. No topsoil is available for replacement on the pan floor and re-vegetation is not an option. With regard to unsafe excavations like concentration ponds all low-grade salt removed from pan floor as part of maintenance will be used to fill these ponds.
As the infrastructure will remain post closure as part of farm improvement no mitigating measures are needed to create a safe post mining environment. No unsafe areas are present within the infrastructure area.
Regular inspections and audits will be used as management system to ensure compliance. At the time of final decommissioning there will be no significant risks and no significant risks will remain post decommissioning and closure.
Documentation and monitoring results will be provided as objective evidence of achieving the objective of minimum legacies as listed in Table 1. The criteria with the contents of these documents must comply with are also given in this table.

Table 1: Objective evidence and closure criteria

Closure objective	Document scope	Author	Success criteria (standard)
Slope stability	Inspection of the post-mining areas with the objective to identify unstable areas and formation of erosion gulley's	Independent EAP	Post-mining area declared stable by DMR
Secured potentially Dangerous post-mining sites	Inspection of the post-mining surface area with the objective to identify unsafe areas	Independent EAP	Post-mining area declared safe by DMR
Waste management practices and infrastructure do not leave/create legacies	Assessment of the completeness of removal of infrastructure and sub-surface concrete and structures	ECO audited by Independent EAP	Comparison of complete infrastructure inventory with signed agreements
			Final performance audit report declares 100% removal of sub-surface concrete and structures down to 1 m subsurface

5.3.2 Create a stable, free draining post mining landform, productive land use that achieves a land capability equal or better than pre-mining

The only mitigating measure that needs to be implemented to prevent long term changes in land use is to level the area and restore the original profile of the pan floor. No topsoil is available for replacement on the pan floor and re-vegetation is not an option.

To prevent significant negative effects arising from changes in post-mining surface water quantities, the post-mining topography will be adjusted where possible to minimise the effect on water flow and increase potential for re-vegetation. During the construction of the concentration ponds and evaporation pans the natural pan floor were raised by average 300mm but due to small footprint will not lead to diverting or damming of surface water.

Should the attenuation measures for prevention of pollution be implemented, the effect on surface water will be insignificant. The most important of these is that any oil or fuel leaks caused during operations must be removed immediately with the saturated soil and placed in bags or drums for disposal at a suitable site.

There will be no risk for acid mine drainage or poor-quality leachates emanating from the mine or residue deposits. Furthermore, no product stockpile will remain on site. It is important to note that for the mine to meet the key objective of economically viable and sustainable grazing, it is imperative that its other key objectives, viz. a safe post-mining area with limited residual impacts and optimal post-mining social opportunities are met.

At the time of final decommissioning there will be a risk regarding the viability and sustainability of agriculture on the rehabilitated areas. Successful rehabilitation will only be proven over time once results from a few consecutive vegetation surveys are available. The risk of possible changes in the surface water quantities and flow patterns leading to erosion on the rehabilitated areas will also remain. When more information becomes available during the post-mining period, appropriate actions will be taken if proved necessary.

The documentation which will be submitted as objective evidence of the state of the above risks at the time of closure is listed in Table 2. With the contents of these documents showing compliance with the closure criteria - also listed in Table 2 - it will be accepted that the mine has achieved the objective of economically viable and sustainable small stock agriculture.

Table 2 Objective evidence and closure criteria for economically viable and sustainable small stock agriculture

Closure objective	Document scope	Author	Success criteria (standard)
Topography compatible with original landform	Inspection of the post-mining surface area with the objective to identify stability compatible with virgin vegetation adjacent to disturbed patches	Independent EAP	Natural salt crust form showing scree and topography and landscape comparable to that of the adjacent virgin area
Stable post mining landform	Inspection of the post-mining surface area with the objective to identify erosion on steep slopes (20% gradient) and disturbed patches,	Independent EAP	At the time of closure, soil loss through water erosion has stabilised over the whole previously disturbed areas
No negative effect on surface water flow	Inspection of the post-mining surface area with the objective to identify erosion due to storm water and sheet flow	Independent EAP	Post-mining area declared stable by DMR
No negative effect on surface water quality	Assessment of the completeness of removal of mine waste	Independent EAP	Final performance audit report declares 100% removal of waste and equipment.

5.3.3 Providing optimal post-mining social opportunities

The impact of mine closure is limited and is not expected to alter the socio-economic circumstances of the study area significantly, however those losing employment will experience significant impacts. Due to the nature of the project no post closure intervention will however be needed. Business which could potentially be exposed to this risk will be identified and action plans to reduce such exposure will be implemented. Contract durations with service providers will be limited to address the risk of contractual agreements surpassing the mine closure date. Minimal negative aesthetic impact will be achieved by the implementation of the tasks required to limit residual environmental impact. Regarding risks associated with the objective of optimum post-mining social activities, at the time an application for a closure certificate is lodged, there will be no significant risks

The documentation which will be submitted as objective evidence and the closure criteria against which the contents of these documents will be measured are summarised in Table 3. Achieving these criteria will be evidence of achieving the objective of optimum post-mining social opportunities.

Table 3 Objective evidence and closure criteria for optimum post-mining social opportunities

Closure objective	Document scope	Author	Success criteria (standard)
Optimal opportunities for social environment (incl. employees)	Assessment on implementation of commitments with third parties	ECO	Report verifies implementation of social responsibilities according to approved EA
Limited environmental impacts during demolition activities	Summary of all complaints received during demolition activities and follow up actions	ECO, audited by independent EAP	Nuisance levels on par with legislative standards after completion of demolition activities. All incidents older than 90 days investigated and feedback given to complainant
Minimal negative aesthetic impact	Inspection and photographic evidence of state of repair of infrastructure to be left.	Independent EAP	Remaining infrastructure and areas with minimal negative aesthetic impact.

6 ESTIMATED COST FOR REQUIREMENTS TO FULLY DECOMMISSION THE SITE

6.1 Assesment of financial provision

According to regulation 6 of the NEMA Financial Regulations 2015 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.

In terms of regulation 11(2) the holder of a right or permit must, on completion of the actions contemplated in subregulation (1), ensure that the adequacy of the financial provision is assessed and any adjustments that need to be made to the financial provision are identified within one year of the commencement of the operations authorised in the right or permit.

6.2 Quantified Closure elements

Due to the unconventional mining process (no rock is broken or waste generated) the rehabilitation procedures required are very different from any conventional form of mining. No remediation of latent or residual environmental impacts which may become known in the future were identified at this stage. 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 this final rehabilitation, decommissioning and mine closure plan in terms of reg. 6(b).

The closure elements within the existing mining area were identified captured and quantified in the sections below. For each closure element, various possible combinations of required rehabilitation work were identified and costs were calculated for each of these, based on quotations obtained from independent third-party suppliers for earthmoving equipment rental and various other consumables. Rates used are from the Contractors Plant Hire Association.

Cost Factor	Closure Element	Cost calculation				
1	**Demolish and remove Buildings/Infrastructure including subsurface structures and bunded fuel storage - Salvage useable material, break structure and dispose in waste dump**	**Cost/h**	**Service hours**	**Labour units**	**Total**	
	Treat petrochemicals in oil separator				R2 500.00	
	Excavator - 20 Ton Demolish concrete and loading	R1 116.00	3.00	0	R3 348.00	
	Tipper Truck 10m³ transport building rubble to excavation to be burried	R491.00	1.00	0	R491.00	
	Treat petrochemicals in oil separator				R2 500.00	
	Total/Ha				**R8 839.00**	
2	**Remove waste from temporary waste storage and scrap from salvage yard**	**Cost/h**	**Service hours**	**Labour units**	**Total**	
	Tipper Truck 10m³ transport to waste disposal site	R491.00	4.00	0	R1 964.00	
	Treat petrochemical in oil seperator - washbay	R1 200.00	2.00	0	R2 400.00	
	Treat petrochemical in oil seperator -	R1 200.00	2.00	0	R2 400.00	
	Cleanup	R25.00	8.00	2	R400.00	
	Total				**R7 164.00**	
3	**Final cleanup - remove all mining related waste walk through with landowner**	**Cost/h**	**Service hours**	**Labour units**	**Total**	
	Tipper Truck 10m³ transport to waste disposal site	R491.00	1.00	0	R491.00	
	Cleanup areas to be screened for petrochemical spills and cleaned	R25.00	1.00	2	R50.00	
	Total/Ha				**R541.00**	
4	**Sloping Sides excavations pit 18°**	**m³/h**	**m²/h**	**Cost/h**	**R/m²**	**R/Ha**
	Excavator - 20 Ton	*	250	556.00	R2.22	R22 240.00
5	**Breaking hardened pan floors, backfilling of ponds and pans and profiling of bund walls**	**m³/h**	**m²/h**	**R/h**	**R/m²**	**R/Ha**
	Cat D9 R Bulldozer	*	5000	R1 580.00	R0.32	R3 160.00
6	**Ripping and levelling - Level and reinstate topography level disturbed areas**	**Speed**	**Ripper/Blade**	**h/Ha**	**R/h**	**R/Ha**
	Grader 140 K	8	3.5	0.36	R687.00	R245.36
7	**Final maintenance of access and service roads**	**Speed**	**Ripper/Blade**	**h/km**	**R/h**	**R/km**
	Grader 140 K	8	3.5	0.25	R687.00	R171.75
8	**Construction of erosion berms**	**Load Vol m³**	**Loads/h**	**m³/h**	**R/h**	**R/m³**
	Excavator cycle	1.2	120	144	R556.00	R3.86
	ADT cycle	17	7	113	R381.00	R3.37
	Total cost/m³					**R7.23**
	Total cost/m		**2**	**7.23**		**R3.62**
9	**Aftercare and Maintenance**				**R/Ha**	
	Monitoring Erosion and AIS				R65.91	

6.3 Calculation of Closure cost

Mining Areas					
Cost Factor	**Closure Element Mitigating measures**	**Unit**	**No Units**	**Unit Cost**	**Cost per Element**
CF 1	Demolish and remove Infrastructure including subsurface structures (Bore holes) - Salvage useable material, break structure and dispose in waste dump	1	1	R6 739.00	R6 739.00
CF 6	Level and reinstate topography - backfilling of Concentration ponds and profiling of bund walll	Ha	5	R245.36	R1 226.79
CF 4	Sloping Sides of excavations 18° Concentration ponds	Ha	0	R2 224.00	R0.00
CF 6	Reinstate topography on Pan Floor	Ha	8	R245.36	R1 962.86
CF 5	Breaking hardened pan floors and stockpile platforms	Ha	8	R3 160.00	R25 280.00
CF 6	Level and reinstate topography and profiling of Surface disturbance (Movement areas)	Ha	5	R245.36	R1 226.79
Infrastructure Area					
Cost Factor	**Closure Element Mitigating measures**	**Unit**	**No Units**	**Unit Cost**	**Annual**
CF 6	Reinstate topography and remove product stockpiles in infrastructure area	Ha	5	R245.36	R1 226.79
	Financial provision required for Final Closure				**R37 662.21**

7 THE PUBLIC PARTICIPATION PROCESS

7.1 Principles and Objectives

The Public Participation Process (PPP) was designed to fulfil the requirements of several pieces of legislation applicable to mine closure. It forms an integral component of the mine closure process by affording Interested and Affected Parties (I&AP) the opportunity to identify environmental issues and concerns relating to the proposed closure, which they feel should be addressed. This is consistent with the provisions of the National Environmental Management Act (Act No. 107 of 1998), Section 2(4)(f), which states that "the participation of all interested and affected parties in environmental governance must be promoted, and all people must have the opportunity to develop the understanding, skills and capacity necessary for achieving equitable and effective participation, and participation by vulnerable and disadvantaged persons must be ensured".

The objective of the mining operation public consultation process is to inform key stakeholders, I&APs and the general public about mine closure objectives and activities during the life of the mine. The PPP was designed to provide sufficient and accessible information to I&APs in an objective manner to assist them to:

- Identify issues of concern, and provide suggestions for enhanced benefits and alternatives associated with mine closure,
- Identify risks not yet identified during the risk assessment exercise,
- Identify risks associated with mine closure and rehabilitation,
- Contribute local knowledge and experience,
- Verify that their issues have been considered.
- Comment on the Risk Assessment and Mine Closure Plan at the time of final decommissioning of the project, including the significance of potential risks that have been identified and associated impacts,
- Play an oversight role in the monitoring and evaluation of mine closure. Play an oversight role in the monitoring and evaluation of mine closure.

7.2 Stakeholder Identification and Project Data Base

Existing data bases were used to inform the list of stakeholders. Special consideration was given to ensure that organizations and individuals that had expressed interest in the activities of the operation, and those who are potentially affected by mine closure, were included on the data base. The following are principles which governed the PPP:

- Key stakeholder groups and the general public comprised the target audience in the development of the PPP.
- Providing information to lay people to allow them to contribute to and participate meaningfully in the process.
- Stakeholder participation is most effective when the proponent and the practitioner recognise, acknowledge and validate stakeholder values when designing a PPP (i.e., there should be no underestimation of the technical and professional competence of citizens).
- The recognition that in the current political climate of South Africa, consultation, empowerment and capacity building is particularly important.

The process of involving stakeholders had three main objectives:

- Steps should be taken to ensure that stakeholder input into the project is relevant and representative.
- Stakeholders should be made aware of their objectives and role in the process,
- An efficient communication and feedback mechanism should be developed during the process to ensure that all stakeholders are kept informed of progress.

Stakeholders were drawn from the sectors outlined below:

- National (DWAS, DMR), Provincial (DENC, DALR) and Local Government (Local and District Municipalities)
- Industry (commercial farmers)
- Corporations and businesses (service providers to operation)
- Operations staff

The operation set up a database of I&APs using existing project databases as a starting point. Names of persons and organisations will be added to or deleted from the database where appropriate.

8 WAY FORWARD

This final Rehabilitation, Decommissioning and Mine Closure Plan will be reviewed on an annual basis to align such approved financial provision set out in regulations 9 and 11, of the NEMA Financial Regulations. Concurrent rehabilitation and remediation will be provided for in the annual rehabilitation plan and will contain information that defines activities on an annual basis and how these relate to the closure vision, as detailed in this final rehabilitation, decommissioning and mine closure plan.

When final planned closure is applied for the operation will submit a final environmental performance audit report to DMR as lead agent for final perusal with the objective to issue a closure certificate. At that point, the closure process, and associated public participation program, will close.