



ORANJE SAND CC

**SAND MINING PERMIT APPLICATION: LOT 1075 OLYVENHOUTSDRIFT
SETTLEMENT, DAWID KRUIPER LOCAL MUNICIPALITY, ZF MGCAWU DISTRICT
MUNICIPALITY, NORTHERN CAPE**


DRAFT BASIC ASSESSMENT REPORT (DBAR) & ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT (EMPr)

DMR REF: NCS 30/5/1/1/2/1 (10678)MP

Date: 31 May 2018

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mineral resources

Department:
Mineral Resources
REPUBLIC OF SOUTH AFRICA

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).

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IMPORTANT NOTICE

In terms of the Mineral and Petroleum Resources Development Act (Act 28 of 2002 as amended), the Minister must grant a prospecting or mining right 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 un-interpreted 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 the 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.

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PART A: SCOPE OF ASSESSMENT AND BASIC ASSESSMENT REPORT

1 CONTACT PERSON & CORRESPONDENCE ADDRESS

1.1 Details of the EAP

Name of The Practitioner: Jennifer Barnard (Green Direction Sustainability Consulting (Pty) Ltd)
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Fax No. : N/A
e-mail address: jenny@greendirection.co.za

1.2 Expertise of the EAP

The qualifications of the Environmental Assessment Practitioner (EAP)

- Masters in Environmental Science: University of KwaZulu-Natal, Durban
- SACNASP: Pr.Sci.Nat. (Professional Natural Scientist)
- EAPASA: Registered with Interim Certification Board of Assessment Practitioners in South Africa

Summary of EAP's Past Experience – See Appendix A

2 LOCATION OF THE ACTIVITY

Farm Name:	Lot 1075 Olyvenhoutsdrift Settlement
Application area (Ha)	5ha
Magisterial district:	ZF Mgcawu Magisterial District
Distance and direction from nearest town	7km south-west of Upington
21 digit Surveyor General Code for each farm portion	C03600060000107500000

2.1 Locality Map

Refer to **Diagram 1** which shows that the nearest Town is Upington located approximately 7km in a south-westerly direction via the R359 from Upington. Access to the site is off the R359 to the site where it passes along existing farm roads and tracks.

Diagram 2 shows the Layout Plan of the Proposed Sand Mining on a section of the unnamed tributary on Lot 1075 Olyvenhoutsdrift Settlement.

3 DESCRIPTION OF THE PROPOSED ACTIVITIES

3.1 The Scope of the Proposed Activities

The proposed sand mining area is situated on a 5ha section of an unnamed tributary on Lot 1075 Olyvenhoutsdrift Settlement, located 7km south-west of Upington. The sand mining operation is to be carried out by the Applicant, Oranje Sand CC.

Mining is in the form of a simple process that only includes loading and hauling of river sand from the Unnamed Tributary. The excavations in the river bed will be on average 1.5 metres deep.

Refer to **Diagram 3: Site Plan** which shows the location of the proposed sand mining permit area, laydown areas and access routes.

Diagram 1: Locality Plan

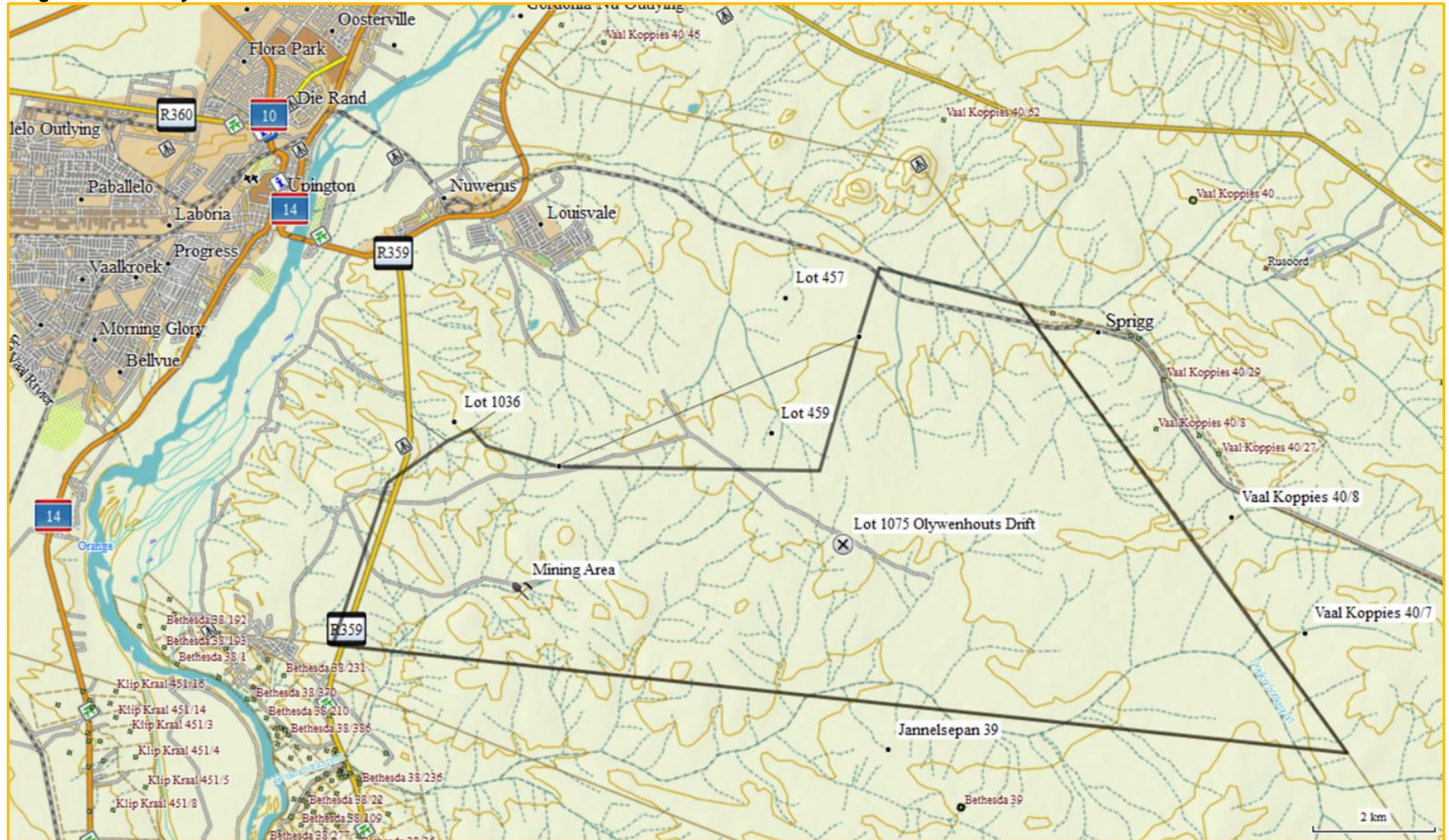


Diagram 2: Layout Plan

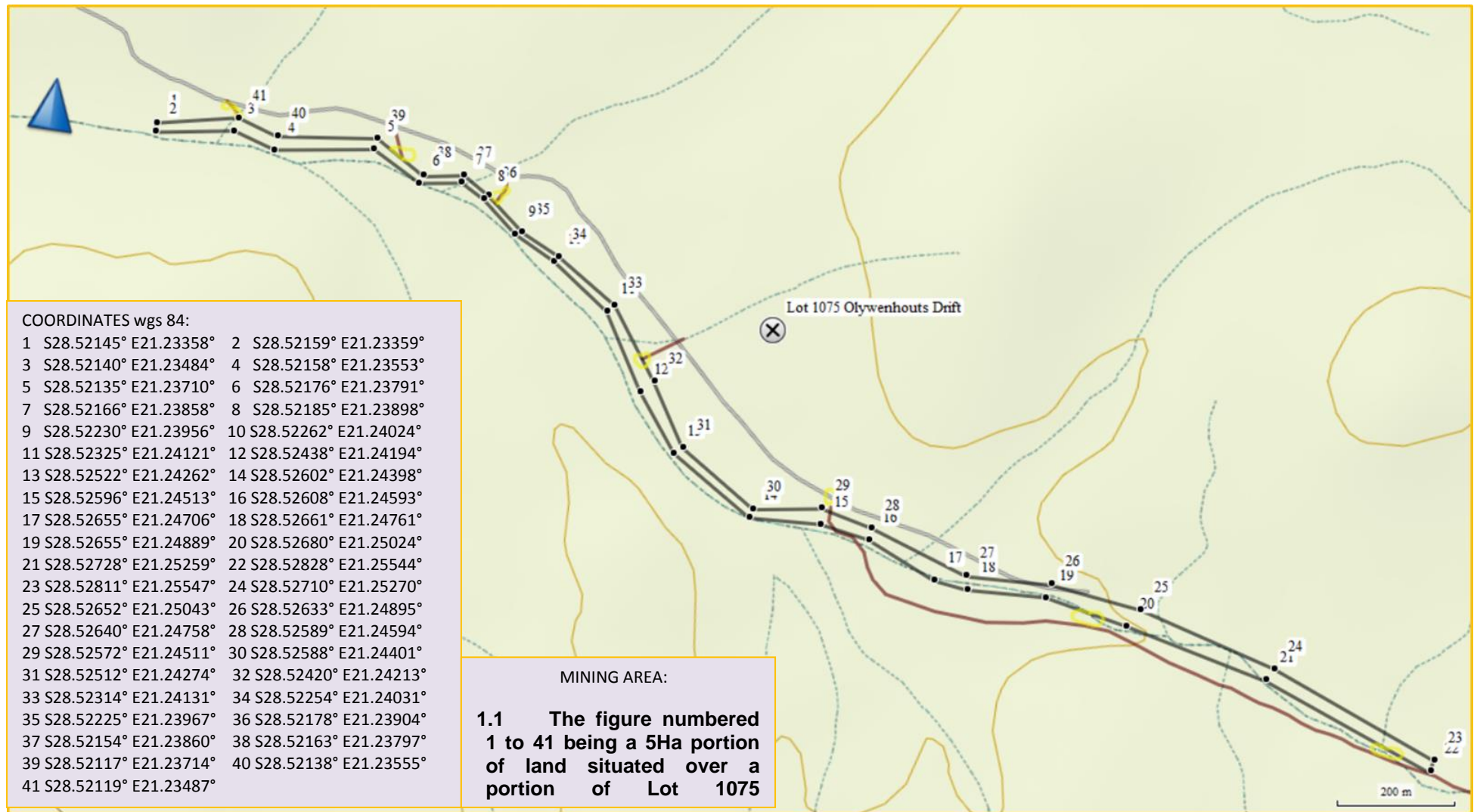
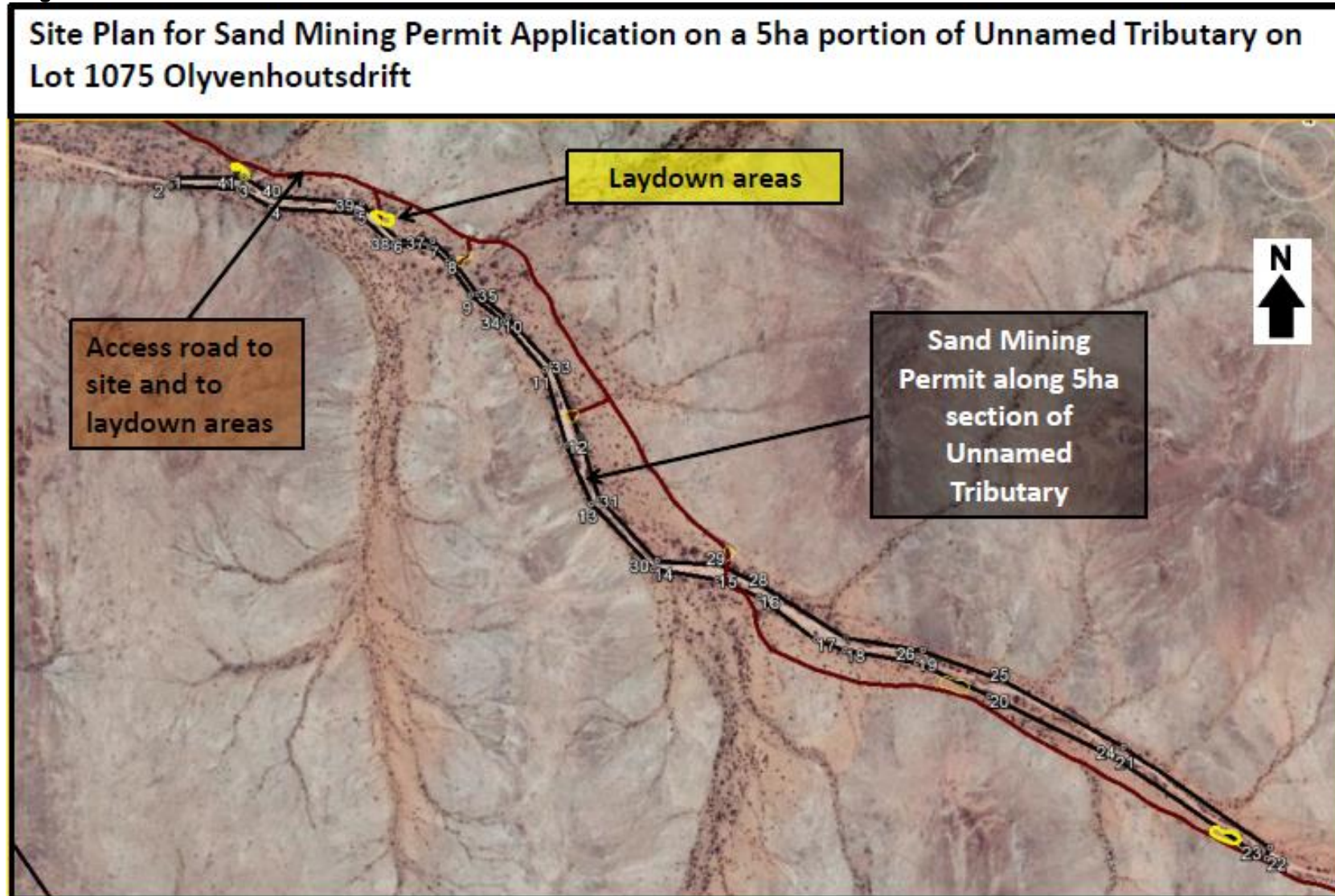


Diagram 3: Site Plan



3.1.1 Construction Phase: Development of infrastructure and logistics

- Access and service roads:
 - Access to the mine works will be via the R359 and existing farm tracks as shown in **Diagram 1**, **Diagram 2** and on the Site plan attached as **Diagram 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.
 - Limited waste management facilities will be supplied that will consist of the following:
 - Plastic containers for domestic waste, which will be transported daily to the Applicant's Headquarters located in Upington;
 - A temporary storage area for used lubrication products and other hazardous chemicals needs to be provided for the collection of the small volume of waste before it is removed to the company headquarters; and,
 - Only one 200-litre container is needed for the small amount of waste.
- Maintenance Oil/grease/diesel management systems will consist of a drip trays for stationary equipment to be provided in the parking area outside the drainage channel.

3.1.2 Operational Phase

- This operation will only involve the loading and hauling of raw river sand. Only one Front End Loader (FEL) will be used for loading and hauling and no processing will take place. The only surface disturbance except for the mining excavation within the drainage channel, will be a small stockpile area and parking for equipment outside the drainage channel, referred to as a laydown area (Refer to **Diagram 3: Site Plan**).
- The depth of the mining operations will be an average depth of 1.5 metres as only the top layer of sand is mined. The total area under excavation will be approximately 4 ha and sand will be removed over the total area. Backfilling is not an option as the sand is completely removed, as it is washed in from upstream.
- No industrial or mine waste is generated during the mining process. All material consisting mainly of river sand is removed from the seasonal drainage channel to an average depth of 1.5m and sold as a FoT¹ product. No processing is taking place except for limited stockpiling so no mining waste or overburden and Fine Residue Dumps (FRD) will be created.
- Domestic or any other waste generated during the mining operation will be stored in a temporary storage area provided as part of the parking area from where it will be removed to the Applicant's Headquarters.
- Only minor repairs are done on site. A PVC lining and drip trays are used during maintenance and accidental spills are cleaned up immediately by removing of the contaminated sand. The small volume of contaminated sand is sold with the rest of the sand to be used in the building industry. Only one FEL is used in the mining process that is transported to the Applicant's headquarters for major repairs.

3.1.3 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.
- Site rehabilitation can make the land more valuable and attractive for resale. Additionally, establishing a closure strategy (and communicating that activity to the public) can help enhance the company's reputation as a socially-responsible operation.
- The decommissioning and closure phase at the end of the life of the mine will consist of implementing the Rehabilitation, Decommissioning and Closure Plan (attached at **Appendix D**).

¹ FoT: "Free on Truck ", which means there is no processing and that it's a raw product.

3.2 Listed Activities

Table 1: Listed and Specified Activities

NAME OF ACTIVITY	Aerial extent of the Activity Ha or m ²	LISTED ACTIVITY Mark with an X where applicable or affected.	APPLICABLE LISTING NOTICE
<p>Mining of river sand from the Unnamed Tributary, including:</p> <ul style="list-style-type: none"> Removal of topsoil from laydown areas adjacent to river bank, access areas to river bed, and stockpiling of topsoil. Refer to Diagram 3: Site Plan. Accessing the site via existing farm tracks. Temporary stockpiling of extracted sand in laydown areas prior to hauling in trucks. Refuse collection containers. Mobile ablution facilities. Removal of natural and alien vegetation. 	Total footprint is 5 hectares	X	<p>GNR 983 Listing Notice 1 of 2014 (dated 8 December 2014), as amended by GNR 327 (dated 7 April 2017):</p> <p>Activity 21: Any activity including the operation of that activity which requires a mining permit in terms of section 27 of MRPDA, including -</p> <p>(a) associated infrastructure, structures and earthworks, directly related to the extraction of a mineral resource; or</p> <p>(b) the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing.</p>
The rehabilitation, decommissioning and closure of the sand mining site on the Unnamed Tributary, which will only be required at final decommissioning and closure.	Total footprint is 5 hectares	X	<p>GNR 983 Listing Notice 1 of 2014 (dated 8 December 2014), as amended by GNR 327 (dated 7 April 2017):</p> <p>Activity 22: The decommissioning of any activity requiring –</p> <p>(i) a closure certificate in terms of section 43 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002)</p>
Mining of river sand from the Unnamed Tributary will require the clearance of an area of 1 hectare or more of indigenous vegetation.	Total footprint is 5 hectares	X	<p>GNR 983 Listing Notice 1 of 2014 (dated 8 December 2014), as amended by GNR 327 (dated 7 April 2017):</p> <p>Activity 27: The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation.</p>
<p>Mining of river sand from the Unnamed Tributary, including:</p> <ul style="list-style-type: none"> Removal of topsoil from laydown areas adjacent to river bank, access areas to river bed, and stockpiling of topsoil. Refer to Diagram 3: Site Plan. Temporary stockpiling of extracted sand prior to hauling in trucks. 	Total footprint is 5 hectares	X	<p>GNR 983 Listing Notice 1 of 2014 (dated 8 December 2014), as amended by GNR 327 (dated 7 April 2017):</p> <p>Activity 28: Commercial or industrial developments where such land was used for agriculture on or after 01 April 1998 and where such development:</p> <p>(ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.</p>
Removal of indigenous vegetation in disturbed areas earmarked for laydown areas adjacent to the access tracks at the river, located outside the drainage channel. Refer to Diagram 3: Site Plan .	Area could be more than 300m ²		<p>Not Listed</p> <p>The site is not located within a critically endangered or endangered ecosystem, or in a CBA gazetted by the Minister, or on land zoned as open space or conservation, and is not designated for protection or conservation in an adopted Environmental Management Framework or Spatial Development Framework.</p>
Temporary hydrocarbon waste storage and general domestic waste	Less than 0.5m ³		Not Listed
Sanitation requirements (chemical toilets)			Not Listed

3.3 Description of the activities to be undertaken

(Describe Methodology or technology to be employed, including the type of commodity to be prospected/ mined and for a linear activity, a description of the route of the activity)

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

3.3.1 Construction phase: Development of infrastructure and logistics

- Due to the small scale of operations no permanent infrastructure will be developed and only existing farm tracks will be used. Upgrading of the existing tracks will be done as part of the construction phase. Refer to **Diagram 2** for the location of the existing farm tracks that provide access off the R359 to the site, and to the proposed project site on the Unnamed Tributary. Existing access tracks to the mine area are shown in **Diagram 3**, to access the sections being worked in a phased manner. This is the method preferred by DMR to keep vehicles and roads out of the drainage channel as much as possible. With regard to access to the mine the existing roads must be used and must be upgraded and maintained as haul roads for trucks as needed by the mine.
- No buildings and infrastructure will be required as the operation will be run from the company headquarters where all logistics will be available.
- No water or electricity is used in the mining operation and no permanent infrastructure will be required due to the small scale and simple mining method to be employed.
- Domestic waste will be collected in plastic containers and transported daily to the company headquarters. A temporary storage area for used lubrication products and other hazardous chemicals needs to be provided for the collection of the small volume of waste before it is removed to the company headquarters. Only one 200 litre container is needed for the small amount of waste.
- Maintenance Oil/grease/diesel management systems will be required for the parking area, and will consist of drip trays for stationary equipment to be provided outside the drainage channel.

3.3.2 Operational phase

- This operation will only involve the loading and hauling of raw river sand. Only one Front End Loader (FEL) will be used for loading and hauling and no processing will take place. The only surface disturbance that will take place, except for the mining excavation within the drainage channel, is a small stockpile area and parking for equipment outside the drainage channel. During operations mining will only consist of loading and hauling of river sand. Only temporary product stockpiles will be developed as sand will be transported to the Applicant's headquarters for stockpiling and distribution as it is loaded.
- The depth of the mining operations will be on average 1.5m as only the top layer of sand is mined. The total footprint will be 5 hectares and sand will be removed over the total area. Backfilling is not an option as the sand is completely removed as it is washed in from upstream.
- No industrial or mine waste is generated during the mining process. All material consisting mainly of river sand is removed from the seasonal drainage channel to a depth of 1.5m and sold as a Free on Truck (FoT) product. No processing is taking place except for limited stockpiling so no mining waste or overburden and Fine Residue Deposits (FRD) will be created.
- Domestic or any other waste generated during the mining operation will be stored in a temporary storage area provided as part of the parking area from where it will be removed to the company HQ.
- Only minor repairs are done on site. A PVC lining and drip trays are used during maintenance and accidental spills are cleaned up immediately by removing of the contaminated sand. The small volume of contaminated sand is sold with the rest of the sand to be used in the building industry. Only one FEL is used in the mining process that is transported to the company headquarters for major repairs.
- The trucks will transport sand from the site 5 days a week, operating during the week only between 7h30 and 17h00 during normal working hours. No operations will take place over weekends or during the builder's break at year end.
- As part of this phase training of personnel in the implementation of the EMPr will be undertaken and the implementation of the environmental awareness plan as part of the EMPr will be an ongoing process.

3.3.3 Decommissioning phase

Planning for closure and restoration from the beginning of an operation makes the process easier; 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 intervals. Site rehabilitation can make the land more valuable and attractive for resale. Additionally, establishing a closure strategy (and communicating that activity to the public) can help enhance the company's reputation as a socially-responsible operation. The decommissioning and closure phase at the end of the life of the mine will consist of implementing the Rehabilitation, Decommissioning and Closure plan (**Appendix D**).

4 POLICY & LEGISLATIVE CONTEXT

4.1 Table of Applicable Legislation and Guidelines

Table 2: Applicable Legislation and Guidelines

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.
Constitution of South Africa, specifically everyone has a right; a. to an environment that is not harmful to their health or wellbeing; and b. to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that: i. prevents pollution and ecological degradation; ii. promote conservation; and iii. Secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.	Mining Permit activities	The mining permit 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.
Minerals and Petroleum Resources Development Act (No 28 of 2002) [MPRDA] Section 27 (as amended)	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 granting of the Mining Permit will apply to the mining activities. DMR is the Competent Authority (CA) for this NEMA application
National Environmental Management Act, 1998 (Act No. 107 of 1998) [NEMA] GNR 983 Listing Notice 1 of 2014 (dated 8 December 2014), as amended by GNR 327 (dated 7 April 2017) Listing Notice 1	Application to the DMR for Environmental Authorisation in terms of the 2014 EIA Regulations	An Application for Environmental Authorisation must be submitted to DMR for an Environmental Authorisation. The listed activities that are triggered determine the Environmental Authorisation (EA) application process to be followed. The appropriate EA will be obtained before proceeding with any sand mining activities. 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. The compilation of this Basic Assessment Report and the Public Participation Process are required in terms of NEMA.
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)	Section 8.2.6; 8.2.7 & 8.2.8. Figures 2, 3 and 4.	There are no listed Critically Endangered, Endangered or Vulnerable ecosystems on site. The site is not located within a River FEPA, and is not featured on the SANBI BGIS NFEPA database as a watercourse. The western portion of the project site is located within a CBA2 area and a small section of the middle portion in an ESA, with the eastern portion

		remaining uncategorised in terms of conservation significance.
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)	Sections 8.2.6	Species 289. <i>Prosopis species</i> are classified as Category 3 in the Northern Cape, which means that it is prohibited to spread or to allow the spread of any specimen.
National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004). National Dust Control Regulations in GN R827 of 1 November 2013	Part B: EMP and Sections 13.8; 13.9; 13.10 & Section 15	Dust control measures are included in the EMPr
National Environmental Management: Waste Act, (Act 59 of 2008) [NEMWA] (as amended)	Part B: EMP and Sections 13.8; 13.9; 13.10 & Section 15 Management measures are included in the EMPr and as part of the environmental awareness plan.	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 sand 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.
National Heritage Resources Act, 1999 (Act No. 25 of 1999)	Section 8.2.10 Part B: EMPr	The sand mining will take place in a non-perennial river bed to an average depth of 1.5metres. Refer to Appendix E1 for the Heritage Impact Assessment and Appendix E2 for the Paleontological Assessment.
National Water Act, 36 (Act 36 of 1998) and General Authorisation (GA) (No. 509 of 2016) in terms of Section 39 of the NWA for Section 21(c) and 21(i).	Section 8.2.7	The applicable Water Use activities are Section 21(c) related to impeding or diverting the flow of water in a watercourse, and Section 21(i) related to altering the bed, banks, course or characteristics of a watercourse. An application for a General Authorisation in terms of GN 509 of 2016 for Section 21(c) and (i) will be submitted to DWS.
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
Land Use Planning Act, 2014 (Act 3 of 2014) (LUPA)	Comments required from the Dawid Kruiper Local Municipality.	Consent use in terms of the Dawid Kruiper Municipal Planning By-Law, 2015 is required to permit mining on properties that are zoned for Agricultural purposes.
Municipal Plans and Policies		
Dawid Kruiper Integrated Development Plan (IDP)	Section 5.3	The Need & Desirability of the project is referenced in terms of the LM IDP, specifically relating to employment creation and sustainable development. Relevant mitigation measures have been included in the EMPr.
ZF Mgcawu District Municipality IDP	Section 5.4	The Need & Desirability of the project is referenced in terms of the District Municipality IDP, specifically relating to employment creation, skills transfer, alien invasive vegetation management climate change and impacts on biodiversity, which are included in the EMPr

Northern Cape Provincial Spatial Development Framework (NCPSPDF)	Section 5.5	Sustainable development is a key consideration as addressed in this impact assessment report.
Northern Cape Provincial Growth and Development Strategy 2004-2014 (NCPGDS)	Section 5.6	Sustainable development is a key consideration as addressed in this impact assessment report.
Standards, Guidelines and Spatial Tools		
Mining and Biodiversity Guideline: 2013 Mainstreaming biodiversity into the mining sector. Pretoria.	Section 5.1 & 8.2.7 Figure 5	The Mining and Biodiversity Guidelines (2013) document identifies four categories of biodiversity priority areas in relation to their biodiversity importance and implications for mining. There is no category of relevance to the proposed sand mining project, as shown in Figure 5 .
DEA Guideline on Need & Desirability (2017)	Section 5.7	Refer to Section 5.7.
DEA Guideline on PPP DMR Guideline on Consultation with Communities and I&APs (undated)	Section 7	Refer to Section 7 and Appendix B .
DEAT Integrated Environmental Management Information Series 5: Impact Significance (2002)	Section 8	Refer to Appendix C .
DEAT Integrated Environmental Management Information Series 7: Cumulative Effects Assessment (2004)	Section 8	Refer to Appendix C .
SANBI BGIS databases (www.bgis.sanbi.org)	Baseline environmental description and Figures 1 to 5	Used during desktop research to identify sensitive environments within the mining permit area.
SANS 1929:2005 Edition 1.1 – Ambient Air Quality Limits for Common Pollutants	Management and monitoring measures	Standard for dust fallout. The activity in question for this application is driving on farm tracks.

5 NEED & DESIRABILITY OF THE PROPOSED ACTIVITIES

5.1 Mining and Biodiversity Guidelines (2013)

The Mining and Biodiversity Guidelines (2013)² 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”³.

The primary environmental objective of the MPRDA is to give effect to the “environmental right”⁴ 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. There is no category of relevance to the proposed sand mining project, as shown in **Figure 5**.

² 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.

³ Constitution of the Republic of South Africa (No. 108 of 1996).

⁴ 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.”

5.2 Building Material Supply and Employment benefits

Building sand is commonly used for the manufacture of plaster, mortar and concrete. Upington fulfils an important urban niche in the Northern Cape region, where the Applicant's cement and sand supply company is located. The project site is located 7km of Upington with direct access to the R359 Road corridor. The area's development potential in terms of renewable energy has seen an increase in the need for construction materials.

The proposed sand mining activity is considered to be a temporary land use, and the area will be rehabilitated in accordance with the Mining Closure and Rehabilitation Plan, attached as **Appendix D**. The benefits of the project can be divided into social and economic classifications. The mine will provide limited direct employment for local persons. The operation further creates indirect employment opportunities in equipment supply industries, transport and sand mining, and the construction environment.

5.3 Dawid Kruiper Draft Integrated Development Plan (2017 - 2022) & Spatial Development Framework

The Dawid Kruiper Local Municipality (DKLM) comprises an area of about 44 231km² 1 and is formally the largest Local Municipality in the whole of South Africa. DKLM makes up 12% of the total Northern Cape Province and about 4% of the whole of South Africa.

Integrated Development Plan (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".

In terms of economic indicators, the Dawid Kruiper Municipality enjoys comparative advantages in all of the economic sectors, except mining, compared to the District. The Municipality should therefore capitalise on these advantages to further strengthen its position in the District. Furthermore, the fastest growing sectors in the Municipality were those of the agriculture, electricity and water, and mining sectors. The current growth occurring in these sectors should be exploited to ensure the creation of new job opportunities for local people.

The long term vision for socio-economic development and environmental sustainability for the municipality is expressed in the SDF, in addition to the guidelines for a land use management.

The IDP lists various minerals and highlights the potential for diamond mining, and does not refer to sand mining in rivers.

The proposed sand mining project will provide job security, local employment, local skills transfer, economic upliftment and building material supply for the solar renewable energy sector, in a sustainable manner as ensured through this environmental impact assessment process and implementation of the Closure and Rehabilitation Plan.

Spatial Development Framework (Draft Report August 2017; Section A)

The SDF contains "Principle 2: Spatial Sustainability: which states that spatial planning and land use management systems must promote the principles of socio-economic and environmental sustainability through encouraging the protection of prime and unique agricultural land; promoting land development in locations that are sustainable and limit urban sprawl; consider all current and future costs to all parties involved in the provision of infrastructure and social services so as to ensure for the creation of viable communities."

This report serves to address the sustainability of the proposed sand mining operation.

5.4 ZF Mgcau District Municipality Draft IDP 2017 - 2018

The ZF Mgcawu District Municipality accounts for about 30% of the Northern Cape economy, and the ZF Mgcawu's economy is largely dominated by mining and agriculture. The vision of this DM is: "Quality support to deliver quality services". The IDP's strategic objective of relevance to this project is considered to be "(v) To Facilitate the Development of Sustainable regional land use, economic, spatial and environmental planning frameworks that will support and guide the development of a diversified, resilient and sustainable district economy", with Local Economic Development (LED) objectives of business development and support highlighted under this objective.

The provision of job security, employment and skills transfer are identified as positive environmental impacts in this DBAR.

The ZF Mgcawu District Municipality acknowledges that climate change poses a threat to the environment, its residents, and future development. Actions are required to reduce carbon emissions (mitigation) and prepare for the changes that are projected to take place (adaptation) in the District. ZF Mgcawu District Municipality has therefore prioritised the development of a Climate Change Vulnerability Assessment and Climate Change Response Plan. Through this program key climate change vulnerability indicators were identified. These are indicators where ZF Mgcawu District Municipality may be at risk to the impacts of climate change, and include biodiversity and the environment, and water.

Changes in climate are predicted to result in the shifting of bioregions in South Africa. In the ZF Mgcawu District Municipality, it is projected that with the warmer temperatures that there will be a replacement of Nama Karoo biome with Savanna and Desert biomes. A large amount of Nama Karoo and Nama Karoo related species will be lost. Terrestrial and river ecosystems and their associated species will also be negatively impacted. The proposed priority responses in the biodiversity and environmental Sector are:

1. Research on better veld/land management practices (overgrazing) & awareness conservation.
2. Monitoring and enforcement of municipal by-laws focusing on conservation and pollution issues.
3. Pursue formal conservation of threatened, endangered and unprotected vegetation types not represented in formal conservation areas.

The ZF Mgcawu District Municipality is currently experiencing issues of water scarcity and quality. Climate change is expected to exacerbate this problem. Drought, reduced runoff, increased evaporation, and an increase in flood events will impact on both water quality and quantity.

The effects of climate change, such as flood events, on the proposed sand mining project will be mitigated as per the measures contained in the EMPr. The mitigation for emissions of greenhouse gases from vehicles associated with the sand mining activities is included in **Appendix C** and included in the EMPr.

5.5 Northern Cape Provincial Spatial Development Framework (NCPsDF)

The NCPsDF 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 NCPsDF was designed as an integrated planning and management tool for all spheres of government to facilitate on-going sustainable development throughout the province.

The NCPsDF, 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 DBAR. The potential negative environmental impacts can be mitigated through the implementation of the EMPr and the Closure and Rehabilitation Plan, to ensure a sustainable sand mining activity.

5.6 Northern Cape Provincial Growth and Development Strategy 2004 – 2014 (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.

5.7 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. Refer to Sections 8 and 9 below which provides the impact process and summary, and **Appendix C** (the impact assessment tables).

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, EMPr and Closure Report, 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 will be undertaken in a transparent manner and all effort will be made to involve all the relevant stakeholders and Interested and Affected Parties. I.e. Public participation will be undertaken to obtain the issues / concerns / comments of the affected people for input into the process.
- **Socially, environmentally and economically sustainable development** – All aspects of the receiving environment and how this will be impacted has 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 were proposed to ensure that the impact is mitigated. i.e. this report along with the EMPr proposes mitigation measures which will minimise the negative impacts of the proposal on the environment.
- **Consideration for ecosystem disturbance and loss of biodiversity** – the Unnamed Tributary is not classified. The western portion of the proposed project site is located in a Critical Biodiversity Area 2 (CBA2), and a small section of the middle portion in an Ecological Support Area (ESA), with the remaining section not zoned for conservation significance. The Bushmanland Arid Grassland 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. There is a high occurrence of alien invasive vegetation on the river banks and in the dry river bed. The sand extraction process is considered to be a relatively short-term type of mining. 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 and Closure Plan (**Appendix D**) proposes mitigation measures which will minimise the impacts of the proposal on the environment.
- **Pollution and environmental degradation** – The implementation of recommendations made and proposed mitigations in the Environmental Management Programme Report (EMPr) will ensure minimum environmental degradation.

- **Landscape disturbance** – All aspects of the receiving environment and how this will be impacted has 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 were proposed to ensure that the impact is mitigated. I.e. Landscape disturbance impacts associated with the development such as erosion and dust has been identified and mitigation measures have been proposed to minimise the impacts.
- **Waste avoidance, minimisation and recycling** – These aspects were considered and incorporated into the operational component of the project.
- **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. The sand will be washed down river into the mined and rehabilitated area over time.
- **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 were proposed to ensure that the impact is mitigated. A number of mitigation measures have been proposed to minimise the impact of the proposal on the environment.
- **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). The report being made available to all identified I&APs to obtain comments on the proposed development.
- **Access of information** – Potential Interested and Affected Parties will be notified of the proposal and the availability of the Draft Basic Assessment Report (DBAR). They will also be notified of having the opportunity to register as an I&AP and they will be kept informed during the course of the BA process.
- **Promotion of community well-being and empowerment** – This process will be undertaken in a transparent manner and all effort will be made to involve all the relevant stakeholders and I&APs.

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

6 MOTIVATION FOR THE PREFERRED SITE, ACTIVITY & ALTERNATIVE

Refer to Section 8 for the description of the alternatives.

The site was selected as it contains good quality building sand located in a convenient position in close proximity to transport routes to the Applicant's business premises where the concrete is manufactured. The layout and technology of this sand mining project has been determined by the shape, position and orientation of the mineral resource, which is the sand in the Unnamed Tributary.

Refer to the Site Plan included as **Diagram 3**. The operational approach is practical and based on best practice to ensure a phased approach of mining followed by rehabilitation in sequential stages.

- The preferred and only location of the sand mining activity is on the earmarked section of the Unnamed Tributary on Lot 1075 Olyvenhoutsdrift Settlement.
- The preferred and only activity is the mining of sand.
- The preferred and only technology is the use of a Front End Loader to remove the sand from the river, and for trucks to transport the sand to the Applicant's cement batching plant.
- The Site Plan or layout of the activity on the site is shown in **Diagram 3**.

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.

7 PUBLIC PARTICIPATION PROCESS

7.1 Introduction

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). Full details of the public participation process conducted including copies of all supporting documents (e.g. the information provided to Interested & Affected Parties (I&APs) and any comments received) will be included in **Appendix B** in the Final BAR.

7.2 Project Notification, BID and I&AP Registration

A Notice of Project and Background Information Document (BID) attached as **Appendix B** will be emailed to the Organs of State. Hard copies of Registered Letters and the BID will be sent via registered post to the adjacent landowners.

The newspaper advertisement will be placed in the Gemsbok Newspaper to appear on the 8th June 2018, and the site notice will be placed at the entrance to the farm adjacent to the R359 and at various public places.

Proof will be included in the Public Participation Report to be included at **Appendix B** in the Final BAR.

The commenting period of 30 days on this Draft Basic Assessment Report and EMP is from **8th June 2018 to 9th July 2018**.

Comments received will be included in the Final Report submitted to DMR for consideration.

Registered I&APs will be notified of the outcome of the Environmental Authorisation issued by DMR.

7.3 Summary of Issues Raised by I&APs

This table will be completed following comments received on the Draft Basic Assessment Report.

Table 3: Summary of Issues Raised by I&APs

Interested and Affected Parties List the names of persons consulted in this column, and Mark with an X where those who must be consulted were in fact consulted.		Date Comments Received	Issues raised	EAPs response to issues as mandated by the applicant	Section and paragraph reference in this report where the issues and or response were incorporated.
AFFECTED PARTIES					
Landowner/s	X				
David Kruiper Local Authority (Erf 1075; Olyvenhoutsdrift Settlement)					
Lawful occupier/s of the land					
N/A					
Landowners or lawful occupiers on adjacent properties	X				
Louisvale Irrigation Board on Farm Jannelsepan No. 39					
Lot 459 David Kruiper Local Authority					
Lot 1036 David Kruiper Local Authority					
Lot 784 David Kruiper Local Authority					
Lot 1077 David Kruiper Local Authority					
Municipal councillor	X				
David Kruiper Local Municipality					
Municipality	X				
David Kruiper Local Municipality:					
Organs of state (Responsible for infrastructure that may be affected Roads Department, Eskom, Telkom, DWA	X				
Ms Nicole Abrahams: National Department of Transport: Environmental Co-ordinator					
Communities					
N/A					
Dept. Land Affairs					
N/A					

Traditional Leaders					
N/A					
Dept. Environmental Affairs & Nature Conservation	X				
Mr. Ordain Riba					
Other Competent Authorities affected	X				
Dept. Water & Sanitation					
Dept. Agric., Land Reform & Rural Development					
SAHRA					
<u>OTHER AFFECTED PARTIES</u>					
<u>INTERESTED PARTIES</u>					

8 PROCESS TO REACH THE PROPOSED PREFERRED ALTERNATIVE

8.1 Process to Reach the Proposed Preferred Alternative

With reference to the site plan provided as **Diagram 3** and the location of the individual activities on site, provide details of the alternatives considered with respect to:

- (a) the property on which or location where it is proposed to undertake the activity;
- (b) the type of activity to be undertaken;
- (c) the design or layout of the activity;
- (d) the technology to be used in the activity;
- (e) the operational aspects of the activity; and
- (f) the option of not implementing the activity.

8.1.1 Location or site alternatives

This site was selected because it contains good quality building sand and it is located in a convenient position close to the R359, Upington and the Applicant's business operations located in Upington. The proposed site is located within a section of the Unnamed Tributary on Lot 1075 Olyvenhoutsdrift, based on the landowners' willingness to permit sand mining activities on their farm, and due to the fact that the river sand is suited for building purposes. The section of the river selected for sand mining has a flat gradient providing a large surface area suitable for excavation, with no permanent surface water and little vegetation. There are no wetlands on site. The vegetation found growing in the river channel is infested with alien invasive plant species, such as *Prosopis* sp. The rural nature of the area effectively means that the proposed mining activities will not disturb any local communities. There are no reasonable or feasible location alternatives for further consideration.

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 the supply of building materials. 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. The mining activity takes place over a relatively short time period, so the selection of the best post-mining long term land use is an important consideration. In the case of this application the best post-mining land use alternative is to return the river to its natural state. Other activity alternatives have therefore not been considered as the purpose of the proposed project is to mine sand from the section of the Unnamed Tributary as indicated in **Diagram 3**. The only other activity required to be assessed in terms of NEMA is the "do-nothing" alternative, as detailed further in section 8.1.6 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, which in this case is linear along an existing river bed lying in an east-west orientation. There would be two feasible ways of mining this resource. It could be mined from east to west or in the opposite direction. Best practice dictates that it is better to mine and rehabilitate the area sequentially in mining blocks from either direction, as this minimises the disturbance to the mining blocks once they have been rehabilitated. The significance of the environmental impacts associated with different possible design or layout alternatives would be very similar, therefore layout alternatives have not been assessed in the impact ratings table.

8.1.4 Technology Alternatives

The technology used in a mining project is determined by the shape, position and orientation of the mineral resource, with the technology alternative for sand mining being restricted to the use of a Front End Loader to remove the sand to an average depth of 1.5 metres, and includes trucks for the hauling of the sand to Upington. There are no technology alternatives for further consideration.

8.1.5 Operational alternatives

The proposed sand mining activities will take place during normal working hours from 07h30 to 17h00 on week days only. The hauling of the sand will therefore also take place during these hours. There are no operational alternatives for further consideration.

8.1.6 The No-go Alternative

The No-Go Alternative will mean that sand mining will not take place. There will no supply of sand for the building and renewable energy industry from this site, resulting in the need to look for suitable sand deposits in other river channels. There will be no new employment opportunities or guaranteed job security provided for those people that the Applicant, Oranje Sand CC currently employs.

The No-Go Alternative will result in the status quo remaining of the section of the Unnamed Tributary earmarked for sand mining. The Unnamed Tributary is not categorised (refer to Section 8.2.6 below). The alien vegetation that is present in the river is required by the National Environmental Management Biodiversity Act to be removed by the landowners, with or without the sand mining operation in the river.

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.

8.2 **The Environmental Attributes Associated with the Alternatives (Baseline Environment)**

8.2.1 Regional Setting

The proposed sand mining area is located on a section of the Unnamed Tributary on Lot 1075 Olyvenhoutsdrift, located 7km south-west of Upington in the Dawid Kruiper Local Municipality of the ZF Mgcawu District Municipality, Northern Cape.

8.2.2 Landscape and Land Use

As described in the Heritage Impact Assessment (Appendix E1): “The surrounding landscape is typical of that occurring generally away from the Orange River in this region, tending to be rocky with shallow sandy soils and relatively to extremely sparse vegetation. This particular stretch of the Unnamed Tributary has quite marked riverine vegetation, where patches of deeper sediment are preserved.”

The proposed project site is located within a section of the Unnamed Tributary over a length of approximately 2.4km with the width varying between 9m to approximately 20m wide over the length of the tributary as shown on **Diagram 2 and 3**. The adjacent landscape is undeveloped natural areas as shown on **Figure 1**, and **Photographs 1 to 4**.

Refer to **Figure 1** which shows that the land-use is “low shrubland” along the water course as per the SANBI BGIS map viewer database dated 2009.

8.2.3 Geology

According to Mucina and Rutherford (2006) most of the area associated with the vegetation type (Bushmanland Arid Grassland) is covered by alluvium and calcrete, with superficial deposits of the Kalahari Group also present in the east. The extensive Palaeozoic diamictites of the Dwyka Group⁵ also outcrop in the area as do gneisses and metasediments of Mokolian age. The soils of most of the area are red-yellow apedal⁶ soils (sandy soils), freely drained, with a high base status and less than 30mm deep with one fifth of the area deeper than 300mm.

⁵ The Dwyka Group is the group of sedimentary geological formations laid down in the Karoo Basin of Southern Africa in the Late Carboniferous and possibly extending into the Asselian of the early Permian. It consists mainly of tillites, laid down along the sandy shorelines of swamplands. The Dwyka is the oldest and lowermost unit of the Karoo Supergroup that is recognized throughout sub-Saharan Africa. (Sourced from https://en.wikipedia.org/wiki/Dwyka_Group)

⁶ A naturally occurring aggregation of soil particles is termed a ped. Soils high in either clay or organic matter will show a high degree of aggregation or pedality. If no peds are present the soil is termed apedal, if peds are present the soil is classified as pedal. (Sourced from: <http://lrrpublic.cli.det.nsw.edu.au/lrrSecure/Sites/Web/5862CF/horticulture/SoilStudies/PhysicalProperties/SoilStructure.htm>)

The river sand in the Unnamed Tributary that has been identified as suitable for the construction industry is fine to medium sand.

8.2.4 Slope

Refer to **Figure 1** which shows the contours at a 20 metre interval.

8.2.5 Climate

According to Mucina and Rutherford (2006), the rainfall is largely in summer and early autumn and is very variable for year to year. The Mean Annual Precipitation (MAP) ranges from about 70mm in the west to 200mm in the east. Mean maximum and minimum monthly temperatures for Kenhart are 40.6°C and -3.7°C for January and July respectively. Frost incidence ranges from around 10 frost days per year in the northwest to about 35 days in the east. Wind swirls (dust devils) are common on hot summer days. Refer to the climate diagram inserted below as Diagram 1 for NKb 3 Bushmanland Arid Grassland [referenced from Figure 7.2 in Mucina and Rutherford (2006)].

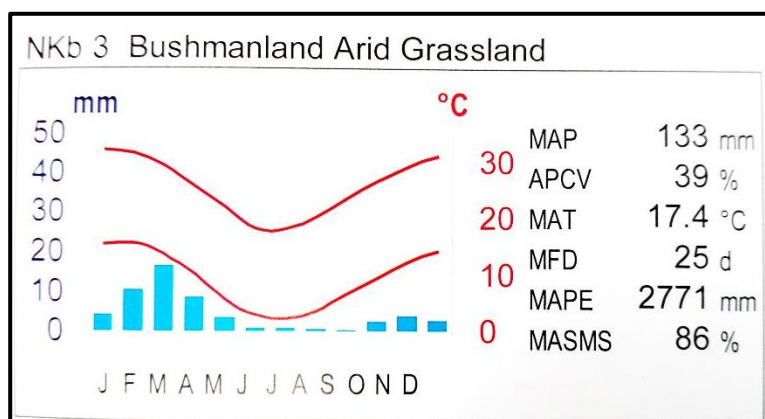


Diagram 1: Climate diagram for NKb 3 Bushmanland Arid Grassland

[The blue bars show the median monthly precipitation. The red lines show the mean daily maximum and minimum temperature. MAP: Mean Annual Temperature. MFD: Mean Frost Days. MAPE: Mean Annual Potential Evaporation. ASMS: Mean Annual Soil Moisture Stress (% of days when evaporation demand was more than double the soil moisture supply).]

8.2.6 Vegetation

Refer to **Figure 2** mapped from the SANBI BIS National Vegetation Map, which shows the location of the project site within Bushmanland Arid Grassland (NKb 3). According to Mucina and Rutherford (2006) this vegetation is associated with extensive to irregular plains on a slightly sloping plateau sparsely vegetated by grassland dominated by white grasses which gives this vegetation type the character of semi-desert 'steppe', with low shrubs in places, and annual herbs after good rainfalls.

According to Mucina and Rutherford (2006) this vegetation type (Bushmanland Arid Grassland) is Least Threatened, with none conserved in statutory conservation areas and with very little having been transformed, where the alien shrub *Prosopis* sp. which can be seen as threat.

The vegetation found along the Unnamed Tributary corridor is characteristic of non-perennial drainage channels in the area, with larger trees located along the banks of the river including such alien invasive trees such as *Prosopis* sp., and protected tree species such as the Camelthorn tree (*Vachellia erioloba*). Refer to Photograph 1 and 2.



Photograph 1: Camelthorn Tree with Social Weaver nests located adjacent to the Unnamed Tributary.



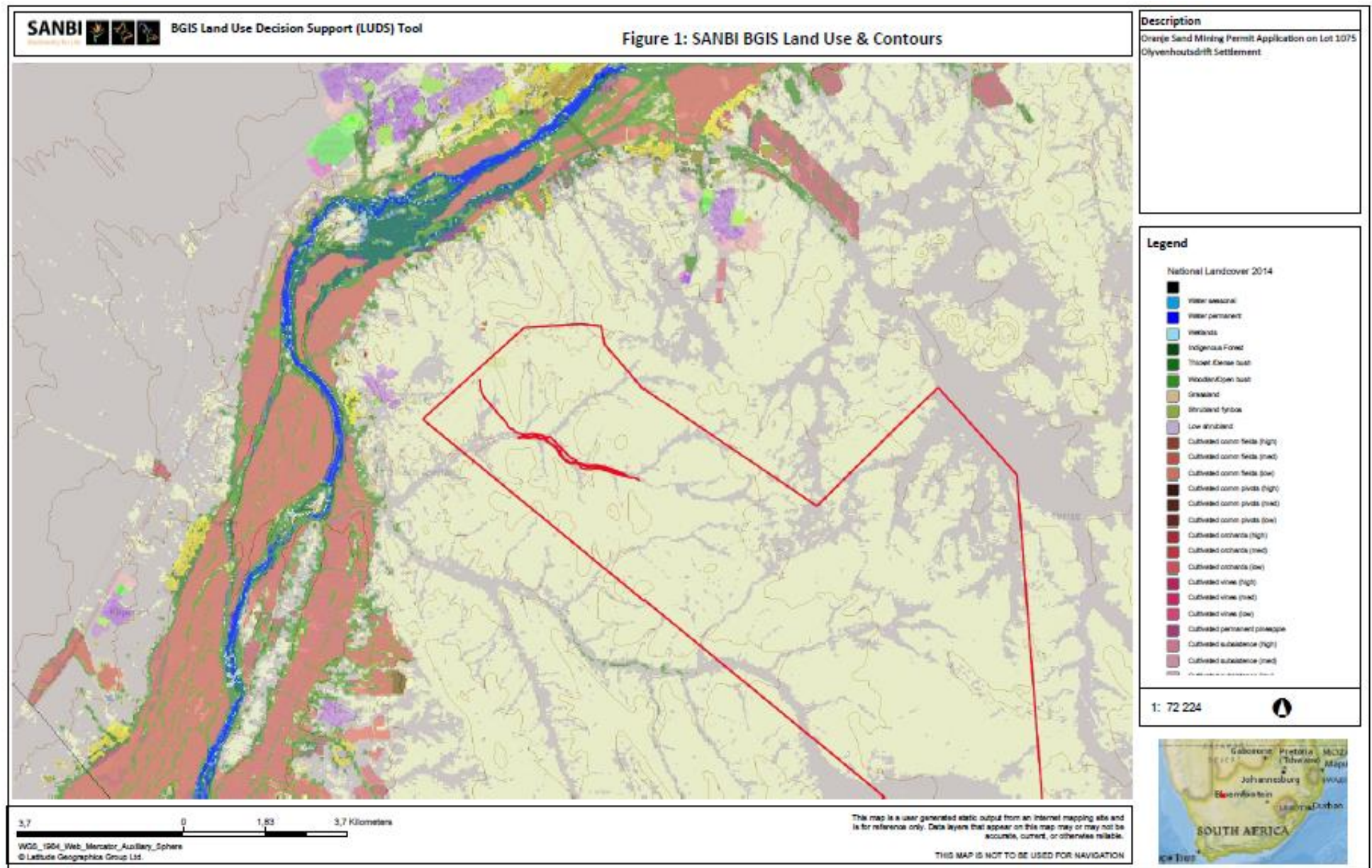
Photograph 2: View eastwards and looking upstream of the Unnamed Tributary.

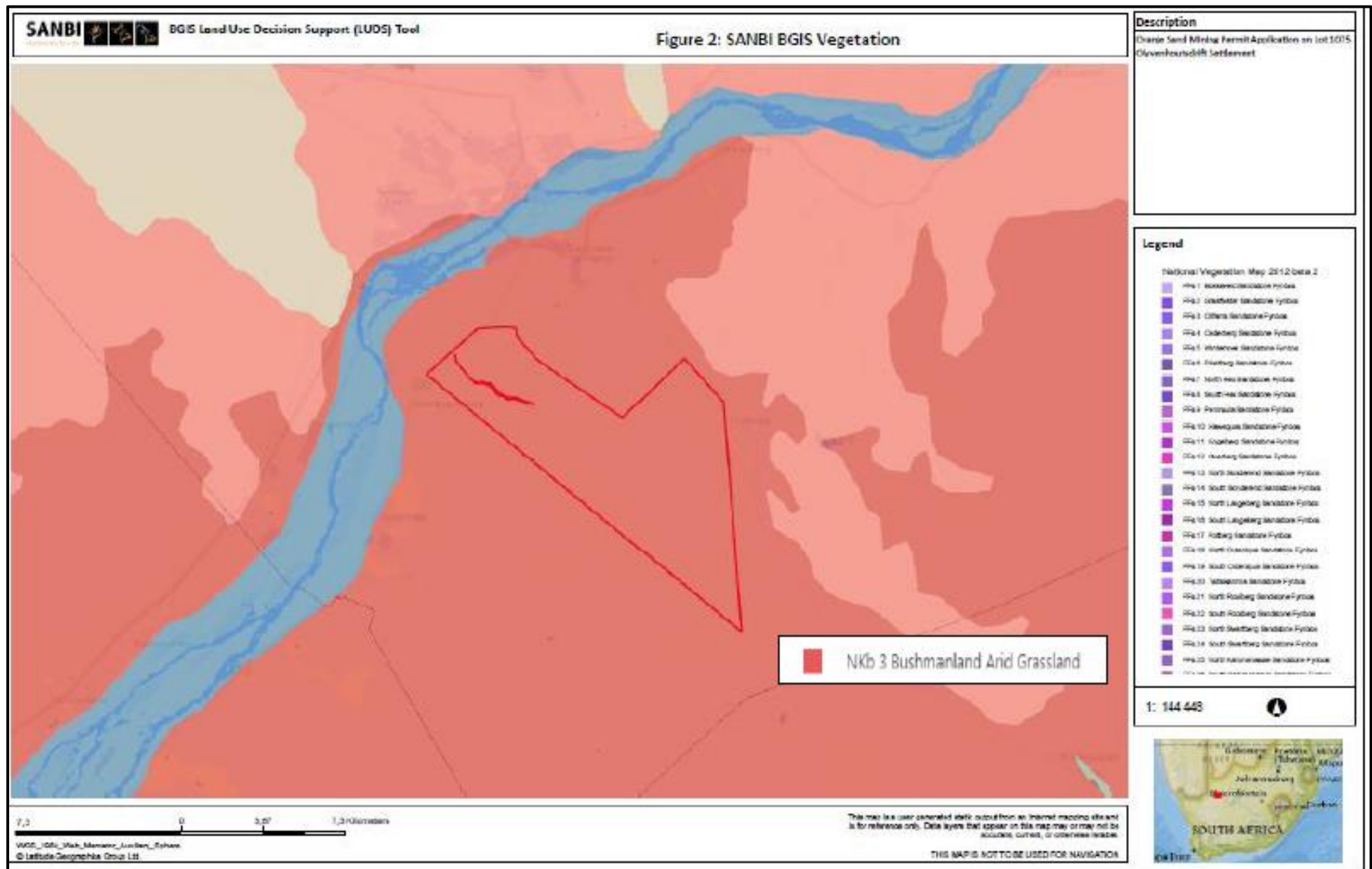


Photograph 3: View south looking across Unnamed Tributary.



Photograph 4: View westwards looking downstream of Unnamed Tributary





8.2.7 Water Resources

The three main rivers in the ZF Mgcawu District Municipality (ZFM) are the Orange, Hartbees and Molopo Rivers. The Orange River is under severe pressure from agriculture and the encroachment of alien vegetation. All rivers in the ZFM, except the Orange River, are non-perennial rivers.

The proposed site is located with the D73F Quaternary Catchment area which falls under the Department of Water & Sanitation's Lower Orange Water Management Area.

Refer to **Figure 3** that shows the location of the project site on a section of the Unnamed Tributary, which is a tributary to the Donkerhoekspuit just before it confluences with the Orange River as observed on Google Earth (refer to **Figure 4**). It is not a Freshwater Ecosystem Priority Area (FEPA)⁷, and is not indicated on the SANBI BGIS NFEPA Database Map Viewer.

River FEPAs achieve biodiversity targets for river ecosystems and threatened/near-threatened fish species, and were identified in rivers that are currently in a good condition (A or B ecological category). Their FEPA status indicates that they should remain in a good condition in order to contribute to national biodiversity goals and support sustainable use of water resources. This does not mean that FEPAs need to be fenced off from human use, but rather that they should be supported by good planning, decision-making and management to ensure that human use does not impact on the condition of the ecosystem⁸. It is important to note that river FEPAs currently in an A or B ecological category may still require some rehabilitation effort, e.g. clearing of invasive alien plants and/or rehabilitation of river banks.

There are no wetlands near the proposed project site as shown in **Figure 3**.

As described in section 5.1 above, 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 category of relevance to this proposed sand mining project is "Category B: Highest Biodiversity Importance" as the site is located in a CBA2, which requires (in summary), an environmental impact assessment process to address the issues of sustainability. According to the 2017 conservation status (not yet gazetted) the eastern portion of the site would then be zoned as "C: High biodiversity importance – high risk to mining" based on an updated database for mining and biodiversity.

Refer to **Figure 5** which shows the Mining and Biodiversity Guidelines as per the SANBI BGIS map viewer.

The proposed activities trigger the National Water Act (Act 36 of 1998) Water Use Activities of Section 21(c) related to impeding or diverting the flow of water in a watercourse, and Section 21(i) related to altering the bed, banks, course or characteristics of a watercourse. An application for a General Authorisation in terms of GN 509 of 2016 for Section 21(c) and (i) has been submitted to DWS.

8.2.8 Critical Biodiversity Areas and Ecological Support Areas

Refer to **Figure 4** which shows that the western portion of the proposed sand mining operation is located within a Critical Biodiversity Area 2 (CBA2), and a small section of the middle portion in an Ecological Support Area (ESA), with the remaining section not zoned for conservation significance.

Critical Biodiversity Areas (CBAs)⁹ are areas that are required to meet biodiversity targets for species, ecosystems or ecological processes and infrastructure. These include:

- All areas required to meet biodiversity pattern (e.g. species, ecosystems) targets;
- Critically Endangered ecosystems (terrestrial, wetland and river types);
- All areas required to meet ecological infrastructure targets, which are aimed at ensuring the continued existence and functioning of ecosystems and delivery of essential ecosystem services; and,
- Critical corridors to maintain landscape connectivity.

⁷ FEPAs are strategic spatial priorities for conserving freshwater ecosystems and supporting sustainable use of water resources. FEPAs were determined through a process of systematic biodiversity planning and were identified using a range of criteria for conserving ecosystems and associated biodiversity of rivers, wetlands and estuaries. FEPA maps are suitable to use at a desktop level for planning and decision-making processes at the national or water management area level. In general, confidence in the FEPA maps at a national level is high but decreases at more local levels of planning.

⁸ "Implementation Manual for Freshwater Ecosystem Priority Areas Report to the Water Research Commission" (WRC Report No. 1801/1/11; AUGUST 2011)

⁹ Pool-Stanvliet, R., Duffell-Canham, A., Pence, G. & Smart, R. 2017. The Western Cape Biodiversity Spatial Plan Handbook. Stellenbosch: CapeNature.

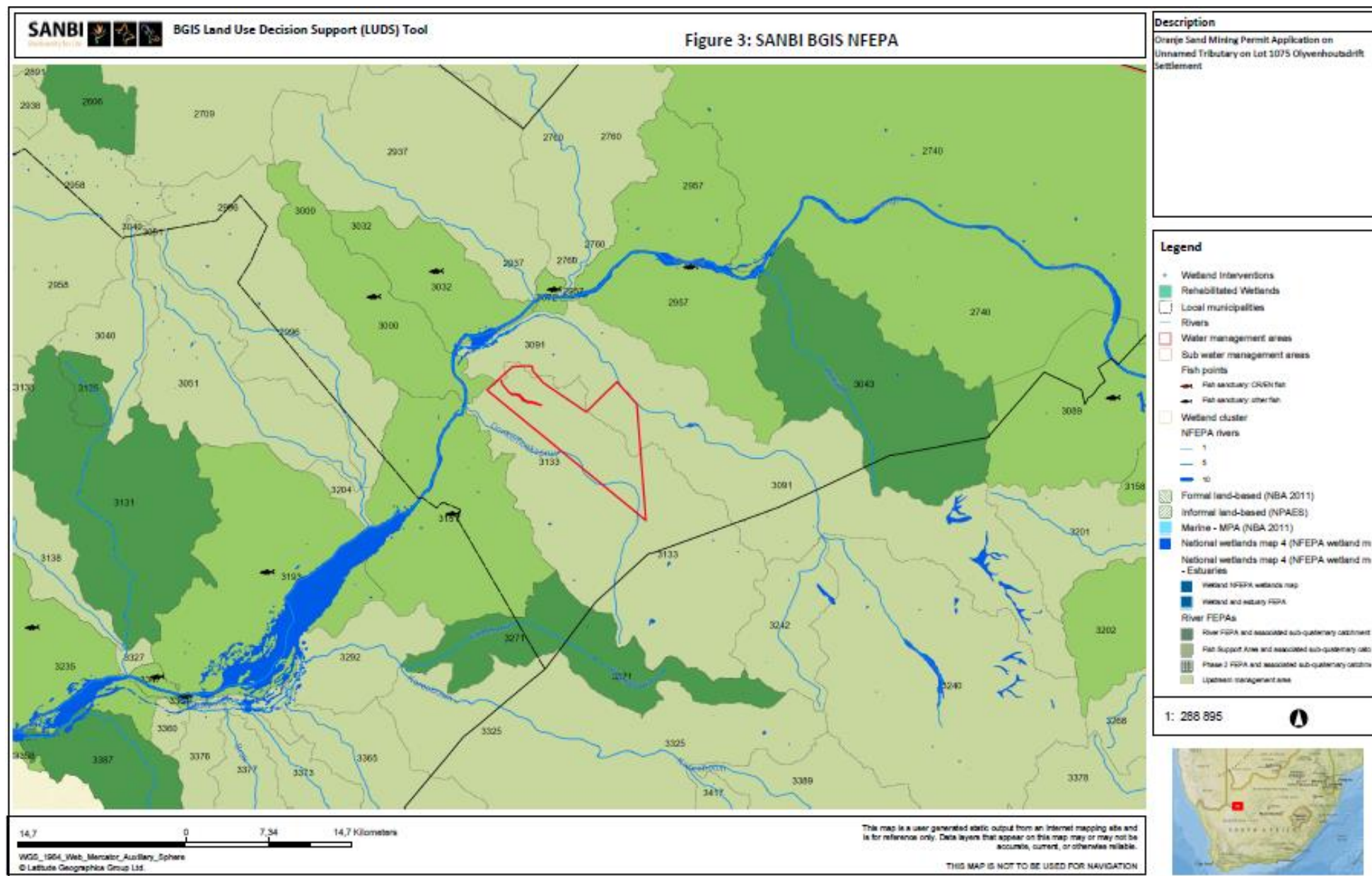
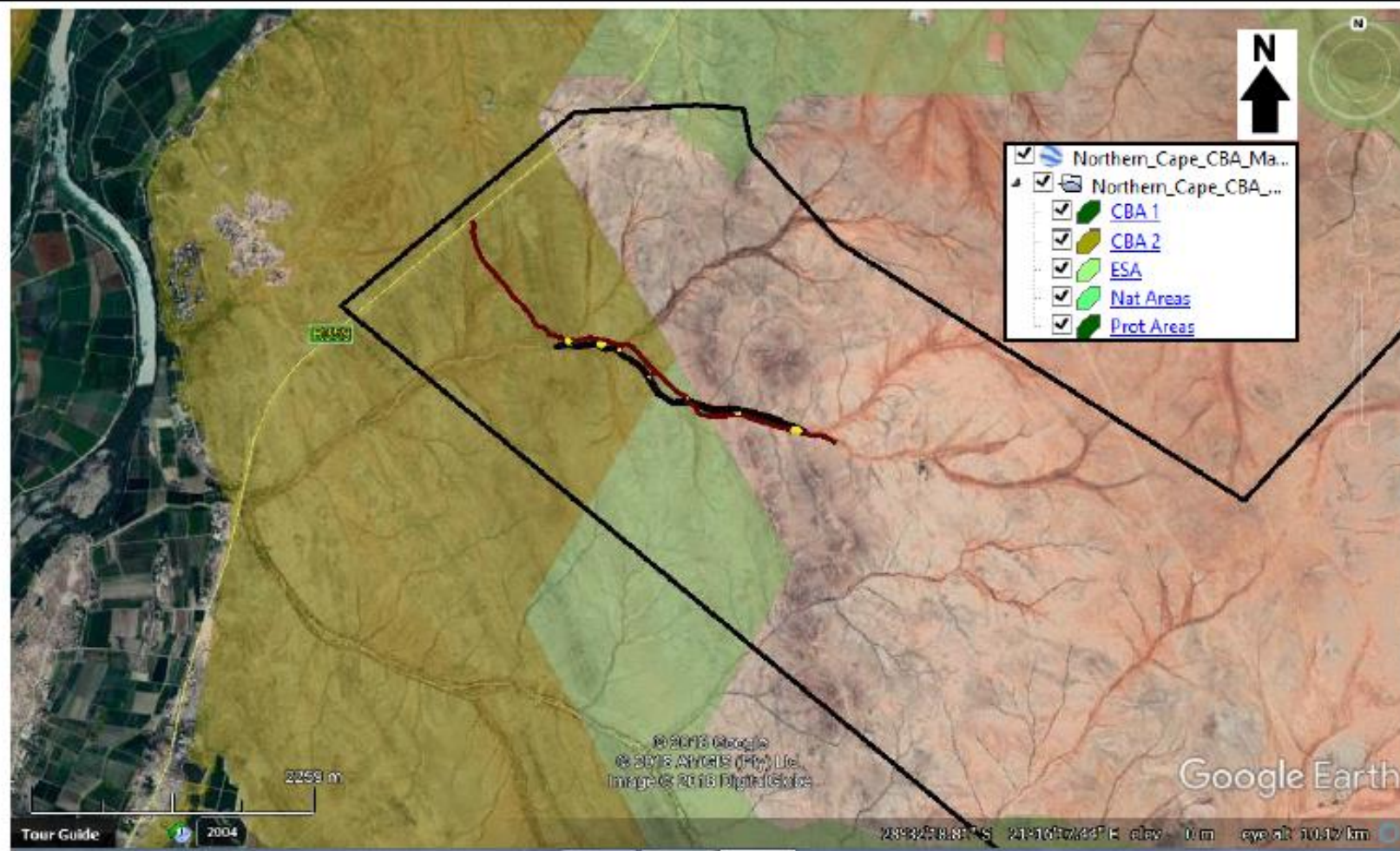


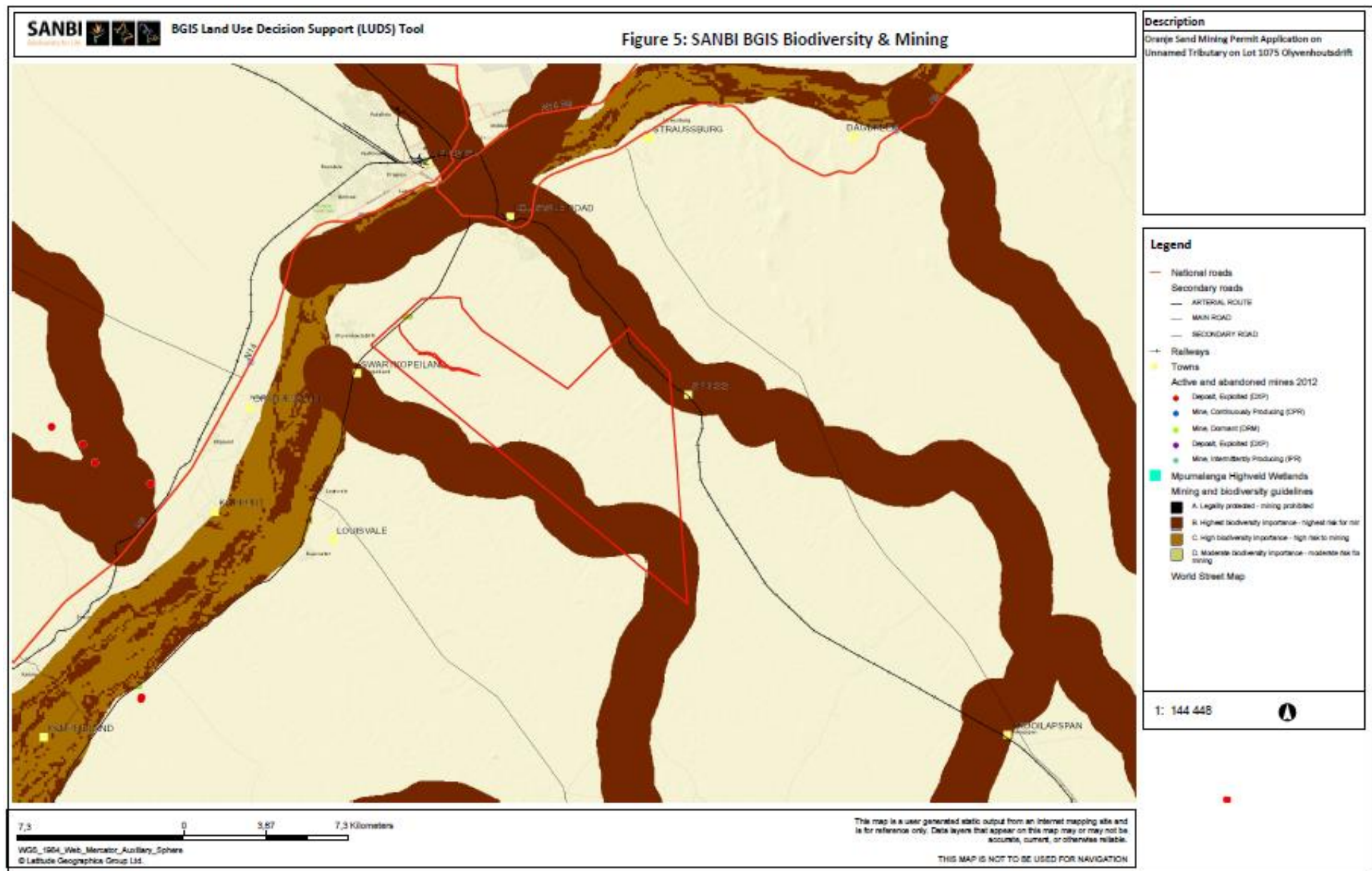
Figure 4: Location of Project Site within a CBA2 & ESA



Lot 1075 Olyvenhoutsdrift Sand Mining Basic Assessment

Source: Database overlay of Conservation Areas from DENC (Nov. 2017)
Scale on Map

green direction
sustainability consulting



CBAs are areas of high biodiversity and ecological value and need to be kept in a natural or near-natural state, with no further loss of habitat or species. Degraded areas should be rehabilitated to natural or near-natural condition. Only low-impact, biodiversity-sensitive land uses are appropriate. In the maps, a distinction is made between CBAs that are likely to be in a natural condition (CBA 1) and those that are potentially degraded or represent secondary vegetation (CBA 2). This distinction is based on best available land cover data, but may not be an accurate or current reflection of condition.

An ESA¹⁰ is described as an area that is not essential for meeting biodiversity targets, but that plays an important role in supporting the functioning of Protected Areas or Critical Biodiversity Areas, and are required for delivering ecosystem services. They support landscape connectivity, encompass the ecological infrastructure from which ecosystem goods and services flow, and strengthen resilience to climate change. They include features such as regional climate adaptation corridors, water source and recharge areas, riparian habitat surrounding rivers or wetlands, and endangered vegetation. ESAs need to be maintained in at least a functional state, in order to support the purpose for which they were identified, but some limited habitat loss may be acceptable. A greater range of land uses over wider areas is appropriate, subject to an authorization process that ensures the underlying biodiversity objectives and ecological functioning are not compromised. Cumulative impacts should also be considered.

8.2.9 Socio-economic

Local economy¹¹

Key constraints/problems/issues in terms of the development of Dawid Kruiper Municipality include a shortage of job opportunities and job creation in the area. The natural resource base and economy does not have the capacity to support the total population, forcing the labour force to seek employment opportunities outside of the Municipality (e.g. Kimberley), etc. Furthermore low levels of income obtained in the area imply low levels of buying power and, therefore, few opportunities for related activities such as trade. This in turn also supports the “leakage” of buying power.

With regards to the socio-economic characteristics of the local population, the employment rate for the Municipality is relatively high, with as much as 75% of people of working age who are actively seeking employment being able to secure a job. However, the majority of the employed population is found in elementary occupations, which require little or no skills. This is also reflected in the low education levels of the local population, with as much as 12% of the population aged 20 years and older having no form of education whatsoever. This, to some extent, constrains the development potential of the Municipality in the development of more advanced industries. The level of employment and type of occupations taken up by the population of the Municipality also directly affects their income levels.

The Municipality's economy is rather centred on the trade and retail sector, due to its strong tourism sector, leaving the local economy fairly vulnerable for any significant changes in this industry. It is, therefore, important that the Municipality seeks to further diversify its economy into other sectors. Furthermore, the manufacturing sector of the municipality is one of the lowest performing sectors of the local economy. This sector has the potential to generate significant growth for the region, and Dawid Kruiper Municipality is experiencing a lack of manufacturing activities. As a result much in the municipality has to be sourced from outside of the municipal boundaries, resulting in money flowing out of the local economy.

Due to the unique spatial manifestation of the municipality, both the first and second economy is mostly located around the CBD and farms. Upington has a well-defined business centre with numerous residential areas. Secondary activities in the study area are mainly light industrial, warehousing, and light engineering works.

New economic opportunities arose for the Dawid Kruiper municipal area with the generation of sustainable solar energy developments, including the need for new power line construction in the area, creating employment opportunities, and economic spin-offs such as an increase in the demand for the supply of locally sourced building materials.

Social Profile¹²

According to the Stats SA Census 2011 data the population of Dawid Kruiper Municipality's was 107 162 in 2016. This reflects an overall population growth of 1.82% between 2011 up to 2016. The unemployment rate decreases significantly from 34% in 2001 to 22.1% in 2011, and there was a huge decline in the youth unemployment rate from 42.3% in 2001 to 29% in 2011 but the youth unemployment rate is still very high in

¹⁰ Referenced from the Western Cape Biodiversity Spatial Plan Handbook (2017)

¹¹ Referenced from Dawid Kruiper Draft IDP (2017-2022)

¹² Referenced from Dawid Kruiper Draft IDP (2017-2022)

comparison with the overall unemployment rate of the municipality. Although about 44.7% of the Dawid Kruiper population is between 14 and 35 years old, youths remains relatively marginalised. All municipal services except sewerage increased since 2001 with electricity for lighting increased from 91.1% in 2011 to 94% in 2016 within the Khara Hais area and 69 % within the Mier Area, respectively.

8.2.10 Heritage and Palaeontological Resources

Heritage

Reference is made to the Heritage Impact Assessment (**Appendix E1**), where it states that “The thick soft river sand between the banks of the spruit – the resource to be mined – yielded no artefacts at all. A few isolated artefacts were noted at various places on (or in exposed sections within) the sand sediments alongside the spruit bed. Previous studies had mentioned similar landscapes in the surrounding area as being virtually entirely bereft of Stone Age traces (Beaumont 2007; de Jong 2010; Dreyer 2013; van Schalkwyk 2013), so that the scarcity of finds is not completely surprising.

The Later Stone Age surface scatter (observations 4 & 5 in Table 3) is the one find of greatest significance (although in itself not a rich site), testifying to the possibility of other similar material occurring. In light of that finding in particular this report emphasizes that sand mining should be constrained as far as possible by the stated intention of mine only within the actual sand channel.”

The Report concluded that: “Precolonial/Stone Age material noted at the portion of Olyvenhoutsdrift-Suid investigated in this study was found to be generally of low significance, where present at all. No archaeological materials were found in the sand source area within the dry bed of the spruit (which apparently had been mined in 1974-9 and has since been replenished by erosion and fresh loads of silt introduced to the bed of the spruit by storm-water). Criteria used here for impact significance assessment for archaeological traces rate the impacts as not worthy of further mitigation. Mining should however be limited to the intended zone within the bed of the spruit so as not to disturb locales such as that noted in observations 4&5 in this report.”

Palaeontology

Reference is made to the Palaeontological Impact Assessment (PIA) (attached at **Appendix E2**) which states that: “The intrusive rocks are plutonic or volcanic in origin and post-date the surrounding metamorphic rocks of the Areachap and Koranaland Groups. The broad age range of 1200 – 1000 Ma is too old for body fossils and the rock type, metamorphic or igneous, would not preserve fossils. Sedimentary rocks are required for preservation of fossils. Because of the age and rock type there would be no chance of finding fossils in this region.

Quaternary alluvial sands do not preserve fossils because of their friable and transported nature. Almond and Pether (2009) do not record fossils from this region.”

As summarised in Appendix E2: “Based on the nature of the project, the alluvial sands only will be removed and the ground would not be penetrated. Since there is no chance of finding fossils in either the hard rock or loose surface sands there would be no impact on the fossil heritage. There is no chance of finding fossils so a phase 2 or site visit is NOT recommended. Taking account of the defined criteria, the potential impact to fossil heritage resources is zero.”

8.2.11 Description of the current land uses

There is intensive irrigation farming associated with the Orange River, and extensive livestock farming in the more arid areas of the region.

Refer to **Figure 1**. The 2009 National mosaic landcover sourced from the SANBI BGIS database shows that Lot 1075 Olyvenhoutsdrift Settlement is classified as natural with low shrubland.

The proposed project site for sand mining is the river bed of the non-perennial Unnamed Tributary. The banks of the river are lined with vegetation characterised by alien invasive plant species, which are also located within the dry river bed in some areas. There are existing tracks on the farm, which provide access to the river bed. Refer to **Diagram 3** (Site Plan).

8.2.12 Description of specific environmental features and infrastructure on the site

Refer to **Diagram 3** and **Figures 1 to 5** which provides an overview of the position of the proposed project site in the Unnamed Tributary, the existing access tracks, and the extent of the vegetation on the river banks and in the river itself.

8.2.13 Environmental and current land use map

Refer to **Figures 1 to 5** provided as part of the specific attributes of the proposed project site.

8.3 **Impacts and risks identified for each alternative**

8.3.1 Overview

As described in Section 3.1 of this report (and elsewhere), the mining activities are restricted to the removal of river bed sand up to an average depth of 1.5 metres from the Unnamed Tributary.

The risks associated with safety:

- The risk of deep and unstable excavations that can be detrimental to the safety and health of humans and animals can be regarded as insignificant given the extremely low rainfall in the area and small size of the excavations. The drainage channel is only in flood on average once a year and during flood events any excavations are filled naturally with sand washed in from upstream.
- Due to the simple mining process that only includes loading and hauling, there will be no unsafe areas like steep slopes that would require demarcation to prevent access by humans and animals.
- No infrastructure, sub-surface voids, fine residue dams or evaporation ponds will be developed that can lead to potentially unsafe post-mining areas; therefore no post mining access control would be required.

The risks associated with the removal of vegetation on the banks:

- This will lead to scouring, and will be mitigated by shaping of the bank of the drainage channel;
- Preventing destruction of vegetation on the banks to prevent scouring; and,
- Restricting the depth of the excavations to an average depth of 1.5m.

The potential risks arising after mine closure are changes in the quantity of surface water compared to pre-mining quantities that may negatively affect the area:

- To prevent significant negative effects the post-mining topography must be adjusted where possible to minimise the effect on water flow and increase potential for re-vegetation.

The risk of erosion and scouring:

- Ensure stability of the bank of the drainage channel by re-shaping and backfilling of the access point with suitable material where required.

The risk of waste:

- No industrial or mine waste is generated during the mining process and all material consisting mainly of river sand will be removed from the site and sold as a FoT product. No processing will take place so no mining waste or overburden and fine residue dumps will be created and there will be only limited product stockpiles present on site.
- The potential risk is related to waste management practices that will require implementing of mitigation and management actions to limit the residual impact after mine closure.

8.3.2 Potential impacts and risks associated with the Preferred Alternative

Refer to **Appendix C** for the full Impact Assessment Tables for the Preferred and Only Alternative (Sand Mining Activity) compared to the No-Go Alternative.

Table 4: Preferred Alternative: Potential Impacts and Risks per Phase per Activity

Phase	Activities	Potential Impacts
CONSTRUCTION PHASE	Site access	Disturbance to river bank at access point
		Disturbance of vegetation and fauna
		Soil compaction from repeated use of access track
	Site Establishment Activities (including: topsoil stripping and stockpiling for lay down areas, waste generation and management)	Noise Generation
		Visual intrusion
		Dust fall and nuisance from activities, dust emission from top soil stripping.
		Wildlife and vegetation disturbance from site preparation
		Removal of alien invasive plant species such as Prosopis sp. (positive impact)
		Soil and sand contamination from hydrocarbons
		Contamination and disturbance of soil from compaction and soil disturbance due to topsoil stockpiling
		Socio-economic impact on job security, employment creation and economic spin-offs (positive impact)
		No impact on heritage artefacts, heritage sites or grave yards
OPERATIONAL PHASE	Removal of sand to a depth of 1.5 metres in the river bed; movement of trucks on site to collect sand for removal; waste generation and management	Noise caused by the machinery and vehicles on site, and by vehicles going to and from the sand mining site
		Visibility of the sand mining operations
		Dust emissions from general site activities (vehicle entrained dust)
		Removal of sand from river bed impacting on river ecosystem
		Wildlife and vegetation disturbance from front end loader and trucks
		Ongoing removal of alien invasive plant species such as Prosopis sp. (positive impact)
		Soil and sand contamination from hydrocarbon spills
		Compaction of soil on access tracks and in river bed due to sand mining activities
		Socio-economic impact on job security, employment creation and economic spin-offs (positive impact)
		No impact on heritage artefacts, heritage sites and grave yards
DECOMMISSIONING PHASE	Rehabilitation of the sand mining area, scarifying compacted areas and vehicle tracks	Shaping of river profile and replacing topsoil
		Ongoing removal of alien invasive plant species such as Prosopis sp. (positive impact)
		Socio-economic impact on job security, employment creation and economic spin-offs (positive impact)

8.3.3 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 landowner and Applicant would forgo an opportunity to create employment and generate an income from this project.

8.4 Methodology used in determining significance of potential impacts

Refer to Table 5 below, which provides the impact assessment criteria applied in the rating of the impacts associated with each phase of the proposed mining activity for the Preferred and Only Alternative. Each impact is 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.

Table 5: Impact Assessment Criteria

ASSESSMENT CRITERIA	
NATURE	
Positive	Beneficial to the receiving environment
Negative	Harmful to the receiving environment
Neutral	Neither beneficial or harmful
EXTENT (GEOGRAPHICAL)	
Site	The impact will only affect the site
Local/ district	Will affect the local area or district
Province/region	Will affect the entire province or region
International and National	Will affect the entire country
CONSEQUENCE	
Loss/gain	The impact will result in loss or gain of resource
No loss/gain	The impact will result in no loss or no gain of resource
DURATION	
Construction period / Short term	Up to 3 years
Medium term	Up to 6 years after construction
Long term	More than 6 years after construction
PROBABILITY	
Definite	Impact will certainly occur (>75% probability of occurring)
Probable	Impact likely to occur (50 – 75% probability of occurring)
Possible	Impact may occur (25 – 50% probability of occurring)
Unlikely	Impact unlikely to occur (0 – 25% probability of occurring)
REVERSIBILITY	
Reversible	Impacts can be reversed though the implementation of mitigation measures
Irreversible	Impacts are permanent and can't be reversed by the implementation of mitigation measures
IRREPLACEABLE LOSS OF RESOURCES	
High	The impact is result in a complete loss of all resources
Medium	The impact will result in significant loss of resources
Low	The impact will result in marginal loss of resources
No Loss	The impact will not result in the loss of any resources
CUMULATIVE EFFECTS	
High	The impact would result in significant cumulative effects
Medium	The impact would result in moderate cumulative effects
Low	The impact would result in minor cumulative effects
SIGNIFICANCE RATINGS	
Very High	Major to permanent environmental change with extreme social importance.
High	Long term environmental change with great social importance.
Medium	Medium to long term environmental change with fair social importance.
Low	Short to medium term environmental change with little social importance.
Very low	Short-term environmental change with no social importance
None	No environmental change
Unknown	Due to lack of information
DEGREE TO WHICH IMPACT COULD BE AVOIDED/MANAGED/MITIGATED	
High	The impact could be significantly avoided/managed/mitigated.
Medium	The impact could be fairly avoided/managed/mitigated.
Low	The impact could be avoided/managed/mitigated to a limited degree.
Very Low	The impact could not be avoided/managed/mitigated; there are no mitigation measures that would prevent the impact from occurring.

8.5 The positive and negative impacts that the proposed activity and alternatives will have

Refer to **Appendix C** for the full Impact Assessment Tables for the Preferred and Only Alternative (Sand Mining Activity) compared to the No-Go Alternative.

Positive impacts

- Creation of employment and job security and economic spin-offs (positive impact)
- Provision of materials for construction industry to support local and regional economic growth related to the renewable energy industry.
- Removal of alien invasive plant species, such as *Prosopis* sp.

Negative impacts

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

- Site access:
 - Disturbance of onsite fauna and flora
 - Soil compaction from repeated use of access track
- Site Establishment Activities (including: topsoil stripping and stockpiling, erection of temporary equipment laydown area, waste generation and management)
 - Noise Generation
 - Visual intrusion
 - Dust fall and nuisance from activities, dust emission from top soil stripping
 - Wildlife and vegetation disturbance from site preparation
 - River bed contamination from hydrocarbons
 - Contamination and disturbance of river sand from compaction and soil disturbance due to topsoil stockpiling
- Removal of sand to an average depth of 1.5 metres in the river bed; movement of trucks on site to collect sand for removal; waste generation and management:
 - Noise caused by the machinery and vehicles on site, and by vehicles going to and from the mining site
 - Visibility of the sand mining operations
 - Dust emissions from general site activities (vehicle entrained dust)
 - Removal of sand from river bed impacting on river ecosystem
 - Wildlife and vegetation disturbance from front end loader and trucks
 - Impact of stormwater run-off during infrequent rainfall events
 - River sand contamination from hydrocarbon spills
 - Compaction of soil on access tracks and in river bed due to sand mining activities
- Rehabilitation of the sand mining area, scarifying compacted areas and vehicle tracks
 - Dust emission from decommissioning activities (vehicle entrained dust)
 - Soil erosion of topsoil
 - Ongoing removal of alien invasive plant species such as *Prosopis* sp. (positive impact)
 - Socio-economic impact on job security, employment creation and economic spin-offs (positive impact)

8.6 The possible mitigation measures that could be applied

Refer to **Appendix C** for the Impact Assessment Tables, as the mitigation measures are included under each impact.

8.7 Motivation where no alternative sites were considered

Alternatives were considered, as described in Section 8.1 and 8.3 above and subjected to the impact rating methodology in Table 5 above as detailed in **Appendix C**.

8.8 Concluding Statement on Alternatives development

The site was selected as it contains good quality building sand located in a convenient position in close proximity to transport routes to the Applicant's business premises where the concrete is manufactured. The layout and technology of this sand mining project has been determined by the shape, position and orientation of the mineral resource which is the sand in the Unnamed Tributary.

Refer to the Site Plan attached as **Diagram 3**.

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 impact assessment component, other than the mandatory "no-go" alternative that must be assessed for comparison purposes against the baseline.

9 ENVIRONMENTAL IMPACT ASSESSMENT

9.1 Full description of the process undertaken to identify, assess and rank the impacts and risks the activity will impose on the preferred site (In respect of the final site layout plan) through the life of the activity

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

Refer to Section 8.3 above where the risks have been described.

Refer to Section 8.4 above where the methodology has been described, and refer to **Appendix C** for the full Impact Assessment Tables for the Preferred and Only Alternative (Sand 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 sand mining activities.

The methodology described above was used to assess the significance of the potential impacts of the sand 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.

9.2 Assessment of each identified potentially significant impact and risk

Table 6: Significance of Impacts per Activity per Phase

NAME OF ACTIVITY	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE In which impact is anticipated	SIGNIFICANCE if not mitigated	MITIGATION TYPE	SIGNIFICANCE if mitigated
Site Access	Disturbance to river bank at access points	<p>Water Resources functionality (flow regime; water quality and quantity; aquatic biota).</p> <p>The Unnamed Tributary is non-perennial and impacts will have little effect on water resource functionality as a whole.</p>	Construction	MEDIUM	<ul style="list-style-type: none"> • Topsoil at access point to be removed prior during construction phase, and replaced during rehabilitation. • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. • 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 stormwater run-off. • Top soil shall be removed separately and stockpiled separately from other soil base layers. • 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. 	LOW

					<ul style="list-style-type: none"> Temporarily halt material handling in windy conditions. Compacted areas that are not required for access shall be scarified after use during decommissioning and rehabilitation. Rehabilitation of the river banks at each access point as soon as that section of the river has been mined. Shaping of river bank to be returned to original profile. 	
	Disturbance of vegetation and fauna	<p>Effect on biodiversity in a CBA2 area and an Ecological Support Area (ESA).</p> <p>The location of the laydown areas have been identified as the existing disturbed areas where clearing would be minimal, resulting in little impact on ecological functioning at a local level during the construction process.</p> <p>The clearing of alien invasive vegetation is a positive impact, and will benefit and improve the ecological functioning of the river bed and adjacent areas.</p>	Construction	MEDIUM	<ul style="list-style-type: none"> Identify existing disturbed patches for laydown areas, and demarcate areas for clearing as shown on Diagram 3. Refer to Diagram 3, which indicates that existing tracks will be used. Demarcate areas for clearing. Remove alien invasive vegetation, No indigenous plants outside of the demarcated work areas may be damaged. Identify protected tree species, and leave these intact, such as Camelthorn trees. Ensure ongoing alien vegetation clearing in the area. The noise and vibration caused by the earthmoving equipment will disturb smaller animals. These will move away whilst operations are in progress. Should any animals be encountered these should be moved away by a suitably trained nature conservation officer, if necessary. 	VERY LOW
	Soil compaction from repeated use of access track.	Loss of soil resource	Construction	MEDIUM	<ul style="list-style-type: none"> After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. 	LOW

	Soil disturbance due to topsoil removal & stockpiling				<ul style="list-style-type: none"> 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 stormwater run-off. Top soil shall be removed separately and stockpiled separately from other soil base layers. 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 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. 	
Site establishment	Visibility	Visual intrusion	Construction	LOW	<ul style="list-style-type: none"> The laydown areas shall be kept neat and tidy at all times. Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly. Restrict working hours to normal work day hours with no work over weekends when holidays occur to minimize hauling trucks along access roads. 	VERY LOW

	Noise, Dust and Vehicle (carbon) emissions	Dust and noise nuisance and greenhouse emissions	Construction	LOW	<ul style="list-style-type: none"> • The Contractor shall adhere to the local by-laws and regulations regarding the noise and associated hours of operations. • The Contractor 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. • Construction and demolition activities generating output of 85dB or more, shall be limited to normal working hours and not allowed during weekends to limit the impact of noise of neighbours. Should the Contractor need to work outside normal working hours, the surrounding neighbours shall be informed prior to the work taking place. • No amplified music shall be allowed on site. • On public roads adjacent to the site 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. • 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. • Trucks shall have tarpaulins to prevent sand from blowing off in transit. 	VERY LOW
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	Disturbance of vegetation and fauna	Disturbance to biodiversity	Construction	MEDIUM	<ul style="list-style-type: none"> Identify existing disturbed patches for laydown areas, and demarcate areas for clearing as shown on Diagram 3. Refer to Diagram 3, which indicates that existing disturbed areas have been earmarked for laydown areas. Demarcate areas for clearing. Remove alien invasive vegetation and ensure ongoing alien vegetation clearing in the area No indigenous plants outside of the demarcated work areas may be damaged. Identify protected tree species, and leave these intact, such as Camelthorn trees. The noise and vibration caused by the earthmoving equipment will disturb smaller animals. These will move away whilst operations are in progress. Should any animals be encountered these should be moved away by a suitably trained nature conservation officer, if necessary. 	VERY LOW
	Soil and sand contamination from hydrocarbons	Loss of soil resource through pollution	Construction	MEDIUM	<ul style="list-style-type: none"> Oils and lubricants must be stored within sealed containment structures if kept on site. 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. Machinery must be kept in good working order and regularly inspected for leaks. A spill kit will be available on each site where mining activities are in progress. Any spillages will be cleaned up immediately. 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 all workers with environmental awareness training. Provide a bin at the site. Regularly dispose of any solid waste at a municipal waste disposal site. Ensure all workers comply with the requirements of the EMPr. Provide a mobile ablution facility. 	LOW

	Contamination and disturbance of soil from compaction and soil disturbance due to topsoil stockpiling	Loss of soil resource	Construction	MEDIUM	<ul style="list-style-type: none"> • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. • 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 stormwater run-off. • Top soil shall be removed separately and stockpiled separately from other soil base layers. • 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 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. 	LOW
	Socio-economic impact on job security, employment	Improvement in people's living standards, and support to local	Construction	MEDIUM (-)	<ul style="list-style-type: none"> • Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling). 	MEDIUM (+)

	creation and economic spin-offs (positive impact)	economy through supply of building materials in response to demand.				
Sand Mining: Removal of sand from river to an average depth of 1.5 metres; movement of trucks on site to collect sand for removal; waste generation and management	Noise caused by the machinery and vehicles on site, and by vehicles going to and from the sand mining site	Noise nuisance	Operation	LOW	<ul style="list-style-type: none"> • Ensure sand hauling is during normal working hours and not on weekends • No amplified music shall be allowed on site. • On public roads the 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. 	VERY LOW
	Visibility of the sand mining operations	Visual intrusion	Operation	LOW	<ul style="list-style-type: none"> • The laydown areas shall be kept neat and tidy at all times. Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly. • Restrict working hours to normal work day hours with no work over weekends when holidays occur to minimize hauling trucks along access roads. 	VERY LOW
	Noise, Dust (vehicle entrained dust) and Vehicle emissions	Dust and noise nuisance and greenhouse emissions	Operation	LOW	<ul style="list-style-type: none"> • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. • Incremental clearing of vegetation in river bed 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 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. 	VERY LOW

					<ul style="list-style-type: none"> Trucks shall have tarpaulins to prevent sand from blowing off in transit. 	
	Removal of sand from river bed impacting on river ecosystem	<p>Water Resources functionality (flow regime; water quality and quantity; aquatic biota).</p> <p>The Unnamed Tributary is a non-perennial river and impacts will have little effect on water resource functionality as a whole. Sand will be washed from upstream to the affected area.</p>	Operation	MEDIUM	<ul style="list-style-type: none"> No stockpiling to take place within the drainage channel. Shaping of river bed to avoid diversion of stormwater towards banks to prevent erosion of river banks, and to prevent channelling of water that would increase erosive capacity of stormwater. Sand will be washed from upstream to the mining site over time. 	LOW
	Wildlife and vegetation disturbance from front end loader and trucks transporting materials.	<p>Effect on biodiversity in a CBA2 area and Ecological Support Area (ESA).</p> <p>Transport of materials will be along existing access tracks resulting in little impact on ecological functioning at a local level during the operation phase.</p> <p>The clearing of alien invasive vegetation is a positive impact, and will benefit and improve the ecological functioning of the</p>	Operation	MEDIUM	<ul style="list-style-type: none"> The mining area and stockpile areas must be demarcated and the footprint contained within the demarcated area. Mining areas to be limited to blocks of 500m at a time with rehabilitation of the bank and access areas required before moving upstream to the next block. The annual rehabilitation plan must be implemented. Remove alien invasive vegetation and ensure ongoing alien vegetation clearing in the area. No indigenous plants outside of the demarcated work areas may be damaged. Identify protected tree species, and leave these intact, such as Camelthorn trees. 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 by a suitably trained nature conservation officer, if necessary. 	LOW

		river bed and adjacent areas.				
	River sand contamination from hydrocarbon spills	Loss of soil resource through pollution	Operation	MEDIUM	<ul style="list-style-type: none"> Oils and lubricants must be stored within sealed containment structures if kept on site. 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. Machinery must be kept in good working order and regularly inspected for leaks. A spill kit will be available on each site where mining activities are in progress. Any spillages will be cleaned up immediately. 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 all workers with environmental awareness training. Provide a bin at the site. Regularly dispose of any solid waste at a municipal waste disposal site. Ensure all workers comply with the requirements of the EMPr. Provide a mobile ablution facility. 	LOW
	Compaction of soil on access tracks and in river bed due to sand mining activities	Loss of soil resource	Operation	MEDIUM	<ul style="list-style-type: none"> Compacted areas that are not required for access shall be scarified after use during decommissioning and rehabilitation. 	LOW
	Socio-economic impact on job security, employment creation and economic spin-offs (positive impact)	Improvement in people's living standards, and support to local economy through supply of building materials in response to demand.	Operation	MEDIUM (-)	<ul style="list-style-type: none"> Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling). 	MEDIUM (+)

Rehabilitation of the sand mining area, scarifying compacted areas and vehicle tracks	Ongoing removal of alien invasive plant species such as <i>Prosopis sp.</i>	Rehabilitation	Decommissioning	MEDIUM	<ul style="list-style-type: none"> Ongoing removal of alien invasive vegetation 	VERY LOW
	Shaping of river profile		Decommissioning	MEDIUM	<ul style="list-style-type: none"> Compacted areas shall be scarified after use during decommissioning and rehabilitation. Any stored topsoil shall be spread over the scarified surface. Shaping of river bed to avoid steep profiles and hollows. 	VERY LOW
	Socio-economic impact on job security, employment creation and economic spin-offs (positive impact)	Rehabilitation	Decommissioning	MEDIUM (-)	<ul style="list-style-type: none"> Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling) 	MEDIUM (+)

The supporting impact assessment conducted by the EAP is attached as **Appendix C**.

9.3 Summary of specialist reports

Table 7: Summary of Specialist Reports

LIST OF STUDIES UNDERTAKEN	RECOMMENDATIONS OF SPECIALIST REPORTS	SPECIALIST RECOMMENDATIONS THAT HAVE BEEN INCLUDED IN THE EIA REPORT (Mark with an X where applicable)	REFERENCE TO APPLICABLE SECTION OF REPORT WHERE SPECIALIST RECOMMENDATIONS HAVE BEEN INCLUDED.
Heritage Impact Assessment attached at Appendix E1	Precolonial/Stone Age material noted at the portion of Olyvenhoutsdrift - Suid investigated in this study was found to be generally of low significance, where present at all. No archaeological materials were found in the sand source area within the dry bed of the spruit (which apparently had been mined in 1974-9 and has since been replenished by erosion and fresh loads of silt introduced to the bed of the spruit by storm-water). Criteria used here for impact significance assessment for archaeological traces rate the impacts as not worthy of further mitigation. Mining should however	X	Section 8.2.10 EMPr: Table 11

	<p>be limited to the intended zone within the bed of the spruit so as not to disturb locales such as that noted in observations 4&5 in this report.</p> <p>Mitigation measures:</p> <p><u>Action 1:</u> Provision for on-going heritage monitoring in an environmental management plan which also provides guidelines on what to do in the event of any major heritage feature being encountered during any phase of mining.</p> <p><u>Responsibility 1:</u> Environmental management provider with on-going monitoring role set up by the mining company for the mining phase and for any instance of periodic or on-going land surface modification thereafter.</p> <p><u>Timeframe 1:</u> Environmental management plan to be in place before commencement of mining.</p> <p><u>Action 2:</u> Should unexpected finds be made (e.g. precolonial burials; ostrich eggshell container cache; or localised Stone Age sites with stone tools, pottery; military remains), the relevant Heritage Authority should be contacted.</p> <p><u>Responsibility 2:</u> Environmental Control Officer should become acquainted at a basic level with the kinds of heritage resources potentially occurring in the area and should report to the Heritage Authority as needed</p> <p><u>Timeframe 2:</u> In the event of finding any of the features mentioned (Action 2) reporting by the developer to relevant heritage authority should be immediate.</p> <p>Contact: SAHRA Ms N. Higgins 021-4624502 or NC Heritage Resources Authority Mr Andrew Timothy 053-8312537/8074700.</p>		
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	<p><u>Performance Indicator:</u> Inclusion of further heritage impact consideration in any future extension of mining or any infrastructural elements.</p> <p><u>Monitoring:</u> Officials from relevant heritage authorities (National, Provincial or Local) to be permitted to inspect the site at any time in relation to the heritage component of the management plan.</p>		
<p>Palaeontological Impact Assessment attached at Appendix E2.</p>	<p>Based on the nature of the project, the alluvial sands only will be removed and the ground would not be penetrated. Since there is no chance of finding fossils in either the hard rock or loose surface sands there would be no impact on the fossil heritage. There is no chance of finding fossils so a phase 2 or site visit is NOT recommended. Taking account of the defined criteria, the potential impact to fossil heritage resources is zero.</p>	X	Section 8.2.10

10 ENVIRONMENTAL IMPACT STATEMENT

10.1 Summary of the key findings of the environmental impact assessment

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 tables.

Table 8: Significance Ratings of Impacts after Mitigation during Construction Phase (Site Access and Site Establishment)

IMPACTS AND ASPECTS	PREFERRED AND ONLY ALTERNATIVE (SAND MINING ON 5HA PORTION OF UNNAMED TRIBUTARY ON FARM LOT 1075 OLYVENHOUTSDRIFT)	NO-GO ALTERNATIVE
1. SOIL EROSION AND COMPACTION: The clearing of laydown areas for site establishment and clearing of existing vegetation 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 repeated use of access tracks.	Low / Insignificant Risk	N/A
2. WATER RESOURCE FUNCTIONALITY IN NON-PERENNIAL RIVER: The removal of sand from the river bank at the access points could impact on flow regime, water quality and quantity, and aquatic biota. The Unnamed Tributary is however, non-perennial and impacts will have little effect on water resource functionality as a whole.	Low / Insignificant Risk	N/A
3. LOSS OF NATURAL VEGETATION AND ECOLOGICAL FUNCTIONING IMPACTING ON LOCAL BIODIVERSITY IN A CBA2 AND ESA: The existing disturbed area has been identified for the laydown area for site establishment. Clearing of existing vegetation in the river bed will result in the loss of vegetation and localized ecological functioning, however this vegetation consists of mostly alien invasive species.	Very Low / Insignificant Risk	N/A
4. POTENTIAL FOR SOIL AND RIVER SAND CONTAMINATION AND SOLID WASTE POLLUTION	Low / Insignificant Risk	N/A
5. VISUAL INTRUSION: Caused by the front end loader, topsoil stockpiles, cleared areas, and movement of trucks on site. The site is however, remote and rural in nature with no receptors (people) as it is located on private property.	Very 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.	Very low / Insignificant Risk	N/A
7. HERITAGE, PALAEONTOLOGICAL AND CULTURAL IMPACTS	Very Low / Insignificant Risk	N/A
8. CREATION OF EMPLOYMENT & JOB SECURITY WITH LOCAL AND REGIONAL ECONOMIC SPIN-OFFS	Medium (+)	Medium (-)

Table 9: Significance Ratings of Impacts after Mitigation during Operational Phase (Sand mining and transporting of materials)

IMPACTS AND ASPECTS	PREFERRED AND ONLY ALTERNATIVE (SAND MINING ON 5HA PORTION OF UNNAMED TRIBUTARY ON LOT 1075 OLYVENHOUTSDRIFT)	NO-GO ALTERNATIVE
1. SOIL EROSION & SOIL COMPACTION: The sand mining process will disturb the river sand increasing the potential for fine particle suspension by wind. Soil compaction will result from repeated use of access tracks.	Low / Insignificant Risk	N/A
2. WATER RESOURCE FUNCTIONALITY IN A NON-PERENNIAL RIVER: The removal of sand from the river channel could impact on flow regime, water quality and quantity, and aquatic biota. The Unnamed Tributary is however, non-perennial and impacts will have little effect on water resource functionality as a whole, as there is no permanent surface water, and storm water run-off events are very seldom in the arid climate. Sand will be transported downstream into the mined area over time.	Low / Insignificant Risk	N/A
3. LIMITED LOSS OF NATURAL VEGETATION AND DISTURBANCE OF ECOLOGICAL FUNCTIONING IN A CBA2 & ESA: The clearing of existing vegetation in the river bed will result in the loss of vegetation and localised ecological functioning. However, the existing vegetation is mostly alien invasive species and biodiversity will improve as a result. Transport of materials will be along existing access tracks resulting in little impact on ecological functioning at a local level during the operation phase. The Front End Loader will disturb local fauna.	Low / Insignificant Risk	N/A
4. POTENTIAL FOR SOIL AND RIVER SAND CONTAMINATION AND SOLID WASTE POLLUTION	Low / Insignificant Risk	N/A
5. VISUAL INTRUSION: Caused by the front end loader, topsoil stockpiles, cleared areas, and movement of trucks on site. The site is however, remote and rural in nature with no receptors (people) as it is located on private property.	Very 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.	Very Low / Insignificant Risk	N/A
7. HERITAGE, PALAEOLOGICAL AND CULTURAL IMPACTS	Very Low / Insignificant Risk	N/A
8. CREATION OF EMPLOYMENT & JOB SECURITY WITH LOCAL AND REGIONAL ECONOMIC SPIN-OFFS	Medium (+)	Medium (-)

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 **Appendix C**.

10.2 Final Site Map

Refer to the proposed site plan attached as **Diagram 3**.

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

Refer to Section 10.1 above.

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

10.4.1 Management Objectives

The proposed impact management objectives are listed below:

- Objective 1 - To create a safe and rehabilitated post-mining environment.
 - Ensure safe mining area with no potentially dangerous areas like deep excavations.
 - The site in the river bed is to be shaped and levelled at each stage of closure and rehabilitation.
 - Topsoil to be stockpiled and replaced during decommissioning and closure, and rehabilitation.
- Objective 2 - To minimise pollution or degradation of the environment
 - Provide sufficient information and guidance to plan the sand mining activities in a manner that would reduce impacts as far as practically possible.
 - 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.
- Objective 3 – To minimise impacts on the community and to provide optimal post-mining social opportunities
 - Ensure that workers remain within the mining permit area.
 - Operate during normal working hours only.
 - Minimise the generation of noise and dust.
 - Respond rapidly to any complaints received.
 - Minimal negative aesthetic impact
 - Optimised benefits for the social environment

10.4.2 Outcomes

- By providing sufficient information to strategically plan the sand mining activities, unnecessary social and environmental impacts be avoided.
- Ensure an approach that will provide the necessary confidence in terms of environmental compliance.
- Provide a management 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.
- Visual intrusion can be managed through natural vegetation or shade cloth, etc.
- 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 sand mining activities are in progress.

10.5 Aspects for inclusion as conditions of Authorisation

- All mining and rehabilitation to be conducted as per the approved EMPr, and Rehabilitation, Decommissioning and Closure Plan (**Appendix D**).
- Concurrent mining and rehabilitation must be done in the designated mining blocks.
- The proposed mining area must be clearly demarcated with semi-permanent markers.
- The upper 50cm of soil must be removed and stockpiled to be returned after mining by spreading evenly over the mined area.
- Eradicate all alien vegetation in the area during and regularly after mining.
- The sand 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.
 - The ECO must:
 - Inspect the site and record compliance with the EMPr;
 - Inform key, on-site staff of their roles and responsibilities in terms of the EMPr;
 - Ensure that all activities on site are undertaken in accordance with the EMPr;
 - Immediately notify the mine operator of any non-compliance with the EMPr, or any other issues of environmental concern.
- Should any burials or other historical material be encountered during construction, work must cease immediately and SAHRA must be contacted.
- 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 to the length of the access road off the N14 where after the national speed limits will be applicable for hauling trucks. The access road will be maintained during operational activities.

10.6 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 to be reasonable and must be implemented in order for the outcome of the assessment to be accurate.

10.7 Reasoned opinion as to whether the proposed activity should or should not be authorised

10.7.1 Reasons why the activity should be authorized or not

It is the opinion of the EAP that the proposed sand 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. There are no significant environmental impacts associated with the proposed activity.
- The site is located in a Critical Biodiversity 2 Area and Ecological Support Area (ESA). The river classification of the Unnamed Tributary is a Category C (Moderately Modified). 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 (**Appendix D**).
- No 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 and the provision of building sand at a local and district level for the renewable energy sector.
- Provided the recommended mitigation measures are implemented and mining activities are managed in accordance with the stipulations of the EMPr, and Rehabilitation, Decommissioning and Closure Plan (**Appendix D**), in an environmentally sound manner, the potential negative impacts associated with the implementation of the preferred alternative can be reduced to acceptable levels.

10.7.2 Conditions that must be included in the authorisation

As per section 10.5 above:

- All mining and rehabilitation to be conducted as per the approved EMPr, and Rehabilitation, Decommissioning and Closure Plan (**Appendix D**).
- Concurrent mining and rehabilitation must be done in the designated mining blocks.
- The proposed mining area must be clearly demarcated with semi-permanent markers.
- The upper 50cm of soil must be removed and stockpiled to be returned after mining by spreading evenly over the mined area.
- Eradicate all alien vegetation in the area during and regularly after mining.
- The sand 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.
 - The ECO must:
 - Inspect the site and record compliance with the EMPr;
 - Inform key, on-site staff of their roles and responsibilities in terms of the EMPr;
 - Ensure that all activities on site are undertaken in accordance with the EMPr;
 - Immediately notify the mine operator of any non-compliance with the EMPr, or any other issues of environmental concern.
- Should any burials or other historical material be encountered during construction, work must cease immediately and SAHRA must be contacted.
- 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 to the length of the access road off the N14 where after the national speed limits will be applicable for hauling trucks. The access road will be maintained during operational activities.

10.7.3 Period for which the Environmental Authorisation is required

The authorisation is required for the duration of the sand 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.

10.7.4 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).

11 FINANCIAL PROVISION

11.1 Legal Framework

With the repeal of Section 41 of the MPRDA (Act 28 of 2002) that requires that the owner of a mine must make financial provision for the remediation of environmental damage, regulations pertaining to the financial provision for prospecting, exploration, mining or production operations under section 44, read with sections 24 of the National Environmental Management Act, 1998 (Act No.107 of 1998) were issued in 2015.

According to regulation 7 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) 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.

11.2 Calculation

Financial provision in terms of reg. 6(c) are covered by the requirements for the actual costs of implementation of the measures required for rehabilitation, decommissioning and closure of the mining operations at the end of the life of operations as reflected in the Rehabilitation, Decommissioning and Mine closure plan in terms of regulation 6(b) and attached as **Appendix D**.

Table 10: Table of Costs for Final Rehabilitation, Decommissioning and Closure of the Mining Operations

Closure Element Mitigating measures	Unit	No Units	Unit Cost	Cost per Element
Remove all stockpiles	Ha	2.5	R2,053.54	R5,133.85
Compacted area - Stockpile and hauling area (ripping & levelling)	Ha	2.5	R1,000.00	R2,500.00
Area covered by normal surface disturbance roads (ripping & levelling)	Ha	5	R1,000.00	R5,000.00
Spread topsoil dumps over ripped areas	Ha	5	R2,053.54	R10,267.70
Reinstate original profile of the riverbank by back filling of access points with the original material excavated	Ha	1	R2,053.54	R2,053.54
Promote re-vegetation of bank with natural riparian vegetation (ripping & levelling)	Ha	2	R1,000.00	R2,000.00
Prompt rehabilitation and maintenance of erosion events	Refer annual rehab plan			
Preventing attenuating or diverting any of the natural flow	Refer annual rehab plan			
Prevent canalisation of the flow	Refer annual rehab plan			
Levelling of the river bed to prevent impeding and damming upstream	Refer annual rehab plan			
Final clean-up	Ha	5	R76.04	R380.20
Annual rehabilitation plan	Year 1			R14,750.00
Total financial provision required to fully decommission and rehabilitate the mining operation				R42,085.29

11.3 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) 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.

11.4 Confirm that this amount can be provided for from operating expenditure

The amount needed for the implementation of the 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 the annual rehabilitation plan is 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. Proof of access to the necessary fund will be provided as part of the Mine Works Plan (MWP) together with proof of access to the necessary financial resources.

12 SPECIFIC INFORMATION REQUIRED BY THE COMPETENT AUTHORITY

12.1 Compliance with the provisions of sections 24(4)(a) and (b) read with section 24 (3) (a) and (7) of the National Environmental Management Act (Act 107 of 1998)

The EIA report must include the:-

- (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 will be captured and addressed within the public participation section of this report (attached as **Appendix B**) to inform the decision-making process.
- 2) Impact on any national estate referred to in section 3(2) of the National Heritage Resources Act
Refer to the Heritage Impact Assessment attached at **Appendix E1** and the Palaeontological Impact Assessment attached at **Appendix E2**.
Comments from SAHRA will be included in the FBAR.

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

A motivation for investigating the reasonable and feasible alternatives is provided in Section 8 above.

PART B

ENVIRONMENTAL MANAGEMENT PROGRAMME REPORT

13 DRAFT ENVIRONMENTAL MANAGEMENT PROGRAMME

13.1 Details of the EAP

This is addressed in Section 1.1 above.

13.2 Description of the Aspects of the Activity

This is addressed in Part A, Sections 9 and 10 above.

13.3 Composite Map

This is addressed in Section 8 above, and the Site Plan is attached as **Diagram 3**.

13.4 Description of Impact management objectives including management statements

This is addressed in Section 10.4 above.

13.5 Determination of closure objectives

This is addressed in Section 10.4 above.

13.6 Volumes and rate of water use required for the operation

The proposed sand mining activity does not require water for operation.

13.7 Has a water use license has been applied for?

An application for a General Authorisation in terms of GN 509 of 2016 for Section 21(c) and (i) has been submitted to DWS.

13.8 Impacts to be mitigated in their respective phases

Table 11: Measures to rehabilitate the environment affected by the undertaking of any listed activity

ACTIVITIES	PHASE	SIZE AND SCALE of disturbance	MITIGATION MEASURES	COMPLIANCE WITH STANDARDS	TIME PERIOD FOR IMPLEMENTATION
SITE ACCESS (use of existing farm tracks; access points to river bed) & SITE ESTABLISHMENT	CONSTRUCTION	Total footprint is 5ha	<p>Impact 1: Soil erosion & soil compaction</p> <ul style="list-style-type: none"> • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. • 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 stormwater run-off. • Top soil shall be removed separately and stockpiled separately from other soil base layers. • 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 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. <p>Impact 2: Water resource functionality</p> <ul style="list-style-type: none"> • Topsoil at access point to be removed prior during construction phase, and replaced during rehabilitation. • After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. • Incremental clearing of ground cover should take place to avoid unnecessary 	<p>NEMA Section 2 Principles</p> <p>Environmental Authorisation</p>	<p>Start of activity and continuous as mining progresses over the site during construction period (site access and site establishment activities)</p> <p>Upon cessation of each activity where applicable.</p> <p>Immediately in the event of spills</p>

			<p>exposed surfaces.</p> <ul style="list-style-type: none"> • Top soil shall be removed separately and stockpiled separately from other soil base layers. • 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. • Temporarily halt material handling in windy conditions. • Rehabilitation of the river banks at each access point as soon as that section of the river has been mined. • Compacted areas are to be scarified. • Shaping of river bank to be returned to original profile. <p>Impact 3: Impact on biodiversity</p> <ul style="list-style-type: none"> • Identify existing disturbed patches for laydown areas, and demarcate areas for clearing. Refer to Diagram 3 which indicates that existing farm tracks will be used, and disturbed areas have been earmarked for laydown areas. • Remove alien invasive vegetation and ensure ongoing alien vegetation clearing in the area. • No indigenous plants outside of the demarcated work areas may be damaged. • All trees and vegetation removed from the drainage channel must be removed so that it does not wash up against fence lines blocking the flow and increasing the possibility of damage. • Flood events can be more intense with possible damage to fences crossing the drainage channel as the flow rate of water will increase in areas mined but as mitigation the mine will be responsible for the repair to all fences directly downstream of the mining operation. • Identify protected tree species, and leave these intact, such as Camelthorn trees. • The noise and vibration caused by the earthmoving equipment will disturb smaller animals. These will move away whilst operations are in progress. Should any animals be encountered these should be moved away by a suitably trained nature conservation officer, if necessary. <p>Impact 4: Contamination & Pollution</p> <ul style="list-style-type: none"> • Oils and lubricants must be stored within sealed containment structures if kept on site. • 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. • Machinery must be kept in good working order and regularly inspected for leaks. • A spill kit will be available on each site where mining activities are in progress. • Any spillages will be cleaned up immediately. • 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 all workers with environmental awareness training. • Provide a bin at the site. 		
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			<ul style="list-style-type: none"> Regularly dispose of any solid waste at a municipal waste disposal site. Ensure all workers comply with the requirements of the EMPr. <p>Provide a mobile ablution facility.</p>		
			<p>Impact 5: Visual landscape</p> <ul style="list-style-type: none"> The laydown areas shall be kept neat and tidy at all times. Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly. Restrict working hours to normal work day hours with no work over weekends when holidays occur to minimize hauling trucks along access roads. 		
			<p>Impact 6: Emissions</p> <ul style="list-style-type: none"> The Contractor shall adhere to the local by-laws and regulations regarding the noise and associated hours of operations. The Contractor 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. Construction and demolition activities generating output of 85dB or more, shall be limited to normal working hours and not allowed during weekends to limit the impact of noise of neighbours. Should the Contractor need to work outside normal working hours, the surrounding neighbours shall be informed prior to the work taking place. No amplified music shall be allowed on site. On public roads adjacent to the site 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. 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. 		
			<p>Impact 7: Heritage resources</p> <ul style="list-style-type: none"> Action 1: Provision for on-going heritage monitoring in an environmental management plan which also provides guidelines on what to do in the event of any major heritage feature being encountered during any phase of mining. Responsibility 1: Environmental management provider with on-going monitoring role set up by the mining company for the mining phase and for any instance of periodic or on-going land surface modification thereafter. Timeframe 1: Environmental management plan to be in place before commencement of mining. Action 2: Should unexpected finds be made (e.g. precolonial burials; ostrich eggshell container cache; or localised Stone Age sites with stone tools, pottery; military remains), the relevant Heritage Authority should be contacted. Responsibility 2: Environmental Control Officer should become acquainted at a basic level with the kinds of heritage resources potentially occurring in the area and should report to the Heritage Authority as needed Timeframe 2: In the event of finding any of the features mentioned (in Action 2), reporting by the 		

			<p>developer to relevant heritage authority should be immediate. Contact: SAHRA Ms N. Higgins 021-4624502 or NC Heritage Resources Authority Mr Andrew Timothy 053-8312537/8074700. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately.</p> <ul style="list-style-type: none"> Performance Indicator: Inclusion of further heritage impact consideration in any future extension of mining or any infrastructural elements. Monitoring: Officials from relevant heritage authorities (National, Provincial or Local) to be permitted to inspect the site at any time in relation to the heritage component of the management plan. <p>Impact 8: Socio-economic</p> <ul style="list-style-type: none"> Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling) 		
Mining of sand material (extraction, loading and hauling)	OPERATION	Total footprint is 5ha: average depth of 1.5 metres	<p>Impact 1: Soil erosion & soil compaction</p> <ul style="list-style-type: none"> After clearing, the affected area shall be stabilized to prevent any erosion or sediment runoff. Stabilized areas shall be demarcated accordingly. Incremental clearing of vegetation in river bed 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 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. Planting of indigenous vegetation in areas under rehabilitation. <p>Impact 2: Water resource functionality</p> <ul style="list-style-type: none"> No equipment may be parked within the drainage channel when not in use. No stockpiling to take place within the drainage channel. Shaping of river bed to avoid diversion of stormwater towards banks to prevent erosion of river banks, and to prevent channelling of water that would increase erosive capacity of stormwater. Sand will be washed from upstream to the mining site over time. <p>Impact 3: Impact on biodiversity</p> <ul style="list-style-type: none"> Identify existing access tracks. Refer to Diagram 3, which indicates that existing farm tracks will be used. Demarcate areas for clearing in the river bed. The mining area and stockpile areas must be demarcated and the footprint contained within the demarcated area. Mining areas to be limited to blocks of 500m at a time with rehabilitation of the bank and access areas required before moving upstream to the next block. The annual rehabilitation plan must be implemented. 	<p>NEMA Section 2 Principles</p> <p>Environmental Authorisation</p>	<p>During the estimated 5 year lifespan of the mine.</p> <p>Start of activity and continuous as mining progresses over the site during operational period.</p> <p>Upon cessation of each activity where applicable.</p> <p>Immediately in the event of spills.</p>

			<ul style="list-style-type: none"> Remove alien invasive vegetation, and ensure ongoing alien vegetation clearing in the area. All trees and vegetation removed from the drainage channel must be removed so that it does not wash up against fence lines blocking the flow and increasing the possibility of damage. Flood events can be more intense with possible damage to fences crossing the drainage channel as the flow rate of water will increase in areas mined but as mitigation the mine will be responsible for the repair to all fences directly downstream of the mining operation. No indigenous plants outside of the demarcated work areas may be damaged. Identify protected tree species, and leave these intact, such as Camelthorn trees. 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 by a suitably trained nature conservation officer, if necessary. 		
			Impact 4: Contamination & Pollution <ul style="list-style-type: none"> Oils and lubricants must be stored within sealed containment structures if kept on site. 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. Machinery must be kept in good working order and regularly inspected for leaks. A spill kit will be available on each site where mining activities are in progress. Any spillages will be cleaned up immediately. 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 all workers with environmental awareness training. Provide a bin at the site. Regularly dispose of any solid waste at a municipal waste disposal site. Ensure all workers comply with the requirements of the EMPr. Provide a mobile ablution facility. 		
			Impact 5: Visual landscape <ul style="list-style-type: none"> The laydown areas shall be kept neat and tidy at all times. Equipment must be kept in designated areas and storing/stockpiling shall be kept orderly. Restrict working hours to normal work day hours with no work over weekends when holidays occur to minimize hauling trucks along access roads. 		
			Impact 6: Emissions <ul style="list-style-type: none"> Ensure sand hauling is during normal working hours and not on weekends No amplified music shall be allowed on site. On public roads the 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. 		
			Impact 7: Heritage resources <ul style="list-style-type: none"> Action 1: Provision for on-going heritage monitoring in an environmental management plan which also provides guidelines on what to do in the event of any major heritage feature being encountered during any phase of mining. 		

			<ul style="list-style-type: none"> • Responsibility 1: Environmental management provider with on-going monitoring role set up by the mining company for the mining phase and for any instance of periodic or on-going land surface modification thereafter. • Timeframe 1: Environmental management plan to be in place before commencement of mining. • Action 2: Should unexpected finds be made (e.g. precolonial burials; ostrich eggshell container cache; or localised Stone Age sites with stone tools, pottery; military remains), the relevant Heritage Authority should be contacted. • Responsibility 2: Environmental Control Officer should become acquainted at a basic level with the kinds of heritage resources potentially occurring in the area and should report to the Heritage Authority as needed • Timeframe 2: In the event of finding any of the features mentioned (in Action 2), reporting by the developer to relevant heritage authority should be immediate. Contact: SAHRA Ms N. Higgins 021-4624502 or NC Heritage Resources Authority Mr Andrew Timothy 053-8312537/8074700. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Thingahangwi Tshivhase/Mimi Seetelo 012 320 8490), must be alerted immediately. • Performance Indicator: Inclusion of further heritage impact consideration in any future extension of mining or any infrastructural elements. • Monitoring: Officials from relevant heritage authorities (National, Provincial or Local) to be permitted to inspect the site at any time in relation to the heritage component of the management plan. 		
Final Rehabilitation and removal of temporary infrastructure	DECOMMISSIONING	Less than 5ha	<p>Impact 8: Socio-economic</p> <ul style="list-style-type: none"> • Employment of local previously disadvantaged labour wherever possible, with provision of training (upskilling) • Implementation of Final Rehabilitation, Decommissioning and Mine Closure Plan. • Compacted areas shall be scarified after use during decommissioning and rehabilitation. • Any stored topsoil shall be spread over the scarified surface. • Shaping of river bed to avoid steep profiles and hollows. • Ongoing removal of alien invasive vegetation. • Planting of indigenous vegetation. 	NEMA Section 2 Principles Environmental Authorisation	

13.9 Impact Management Outcomes

Table 12: Impact Management Outcomes

ACTIVITY (whether listed or not listed).	POTENTIAL IMPACT	ASPECTS AFFECTED	PHASE In which impact is anticipated	MITIGATION TYPE	STANDARD TO BE ACHIEVED
Site access	Disturbance of river bank at access points	Water resources functionality in a non-perennial river	Construction	Remedy through restriction and rehabilitation	Impacts minimised and mitigated. End use objectives achieved through rehabilitation.
	Disturbance of fauna and flora	Biodiversity in an CBA2 & ESA		Remedy through restriction and 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 in an CBA2 & ESA		Remedy through restriction and rehabilitation	
	Soil and sand contamination, soil compaction and disturbance	Soil resource		Remedy through restriction and rehabilitation & control through monitoring and management	
	Destruction or loss of Heritage resources	Cultural and Heritage		Avoidance by relocation of activity if required	Impact avoided
Removal of sand, 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 in an CBA2 & ESA		Remedy through restriction and rehabilitation	
	Soil and sand contamination, soil compaction and disturbance	Soil resource		Remedy through restriction and rehabilitation & control through monitoring and management	
	Disturbance of river bed; sand extraction	Water resources functionality in a non-perennial			

		river			
	Destruction or loss of Heritage resources	Cultural and Heritage		Avoidance by removing sand only in river bed and not banks.	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.
	Soil erosion due to slow recovery of vegetation	Soil resource & biodiversity		Remedy through restriction and rehabilitation & control through monitoring and management	End use objectives achieved through rehabilitation.
	River bed profile	Water resources functionality in a non-perennial river.			

13.10 Impact Management Actions

Table 13: Impact Management Actions

ACTIVITY whether listed or not listed.	POTENTIAL IMPACT	MITIGATION TYPE	TIME PERIOD FOR IMPLEMENTATION	COMPLIANCE WITH STANDARDS
Site access	Disturbance of river bank at access points	Remedy through restriction and rehabilitation	Concurrently with site access activities	Remain within the ambit of the Mining Permit Programme and Environmental Authorisation
	Disturbance of fauna and flora	Control through monitoring and management	Upon cessation of activity	
	Soil compaction and erosion			
Site establishment, including waste generation and management	Visibility	Control through monitoring and management		
	Emissions (dust, noise & vehicles)			
	Disturbance of fauna and flora	Remedy through restriction and rehabilitation		
	Soil and sand contamination, soil compaction and disturbance	Remedy through restriction and rehabilitation & control through monitoring and management		
	Destruction or loss of Heritage resources	Avoidance		
Removal of sand, loading and hauling, waste generation ad management	Visibility	Control through monitoring and management	Concurrently with site access activities	Remain within the ambit of the Mining Permit Programme and Environmental Authorisation
	Emissions (dust, noise & vehicles)	Control through monitoring and management	Upon cessation of activity	

	Disturbance of fauna and flora	Remedy through restriction and rehabilitation		
	Soil and sand contamination, soil compaction and disturbance	Remedy through restriction and rehabilitation & control through monitoring and management		
	Disturbance of river bed; sand extraction			
	Destruction or loss of Heritage resources	Avoidance		
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 Mining Permit Programme and Environmental Authorisation
	Soil erosion due to slow recovery of vegetation	Remedy through restriction and rehabilitation & control through monitoring and management		
	River bed profile			

14 FINANCIAL PROVISION

14.1 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 rehabilitated post-mining environment:
 - Ensure safe mining area with no potentially dangerous areas like deep excavations.
 - The site in the river bed is to be shaped and levelled at each stage of closure and rehabilitation.
 - Topsoil to be stockpiled and replaced during decommissioning and closure, and rehabilitation.
- Objective 2 - To minimise pollution or degradation of the environment:
 - Provide sufficient information and guidance to plan the sand mining activities in a manner that would reduce impacts as far as practically possible.
 - 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.
- Objective 3 – To minimise impacts on the community and to provide optimal post-mining social opportunities:
 - Ensure that workers remain within the mining permit area.
 - Operate during normal working hours only.
 - Minimise the generation of noise and dust.
 - Respond rapidly to any complaints received.
 - Minimal negative aesthetic impact
 - Optimised benefits for the social environment

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

The closure objectives are included in this Draft BAR and in the Rehabilitation, Decommissioning and Mine Closure Plan (**Appendix D**), which is being made available to all registered Interested and Affected parties.

14.3 Provide a rehabilitation plan that describes and shows the scale and aerial extent of the main mining activities, including the anticipated mining area at the time of closure

Refer to the Rehabilitation, Decommissioning and Mine Closure Plan, which includes the Environmental Risk Assessment in **Appendix D**.

14.4 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 sand mining activities back to its original condition. The rehabilitation plan provides the detail on how this will be achieved as detailed in **Appendix D**.

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

Refer to Part A, Section 11.2 of this report.

14.6 Confirm that the financial provision will be provided as determined

Refer to Part A, Section 11.4 of this report.

14.7 Mechanisms for monitoring compliance with and performance assessment against the Environmental Management Programme and reporting

Table 14: Mechanisms for Monitoring Compliance

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.
Sand Mining	Visual inspection of biodiversity impacts	Visual inspection of sand 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)	Daily 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; River profile; 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	Bi-Annual A final audit report for site closure must be submitted to the DMR for approval.

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

An external environmental performance audit and the BA & EMPr performance assessment shall be conducted annually interchangeably by an independent environmental assessment practitioner.

15 ENVIRONMENTAL AWARENESS PLAN

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

Environmental awareness and training includes:

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

Before commencement of the sand 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 EMPr 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 EMPr document will also be made available to attendees.

15.2 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 15.1 above. Should an incident of environmental pollution or damage occur it will be analysed and appropriate prevention and/or mitigation measures developed. These measures will be added to the EMPr 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; and, large spillages from equipment.

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 licensed hazardous disposal facility) or bioremediation (at a licensed facility) of this material.

Fire

There is the potential for fire to occur in the following locations of the sand mining 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 sand mining activities will take place and in the vehicles. All staff members will be trained in the use of fire-fighting equipment.

15.3 Specific information required by the Competent Authority

Not applicable at this stage.

16 UNDERTAKING

The EAP herewith confirms

The correctness of the information provided in the reports;	X
The inclusion of comments and inputs from stakeholders and I&APs; (to be included in Final BAR)	N/A
The inclusion of inputs and recommendations from the specialist reports where relevant; and	X
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. (to be included in Final BAR)	N/A



Signature of the environmental assessment practitioner:

Green Direction Sustainability Consulting (Pty) Ltd

Name of company:

31 May 2018

Date:

-END-

17 APPENDIX A: CV OF EAP

Summary of the Environmental Assessment Practitioner's past experience

Jennifer Barnard has been registered with the South African Council for Natural Scientific Professions since 2009, and was awarded certification as an Environmental Assessment Practitioner (EAP) by the Interim Certification Board of South Africa in 2010. She has worked on numerous Environmental Impact Assessments, both in South Africa and the United Kingdom and has considerable experience in the preparation and compilation of Environmental Impact Reports, Environmental Management Programmes, Environmental Audits, and Environmental Management Frameworks, including construction monitoring where required. She has been working in the environmental consultancy field for 21 years, and prior to that in the KwaZulu-Natal Provincial Local Government and Development Planning (Environmental Planning and Policy Division) for 5 years.

Specific examples of private consultancy EAP experience include:

- Project Manager and Lead EAP of the Eskom Transnet Coal Link Suite of Projects (in terms of the NEC2 Contract with EIA project value of R6 million), which spanned both Mpumalanga and KwaZulu-Natal;
- Project Manager and Lead EAP of two SANRAL Road Upgrades on the N7, that included Borrow Pits;
- EAP for various Basic Assessments and EIAs in the Northern Cape for agricultural activities, and related Water Use General Authorisation Risk Matrices.
- Water Use General Authorisation for sand mining outside Pella, Northern Cape.
- EAP for Basic Assessment and Water Use General Authorisation for a Sand Mining Application in the Hartbees River, Kakamas, Northern Cape.
- EAP for Basic Assessment for Kaoline Mining outside Garies in the Northern Cape.
- EAP for Basic Assessment for sand mining in the Donkerhoekspruit near Louisvale, Northern Cape.
- EAP for EIA (in progress) for three granite mines located north-east of Pofadder in the Northern Cape.

18 Appendix B: Public Participation Process Report

18.1 Appendix B1: Background Information Document

BACKGROUND INFORMATION DOCUMENT (BID)

PROPOSED SAND MINING PERMIT APPLICATION:

5HA SECTION OF UNNAMED TRIBUTARY ON LOT 1075 OLYVENHOUTSDRIFT SETTLEMENT, LOCATED 7KM SOUTH-WEST OF UPINGTON, DAVID KUIPER LOCAL MUNICIPALITY

31 May 2018

DMR REF.: NCS 30/5/1/1/2/1 (10678)MP

INTRODUCTION

The Applicant, Oranje Sand CC proposes to mine sand in a section of the Unnamed Tributary located 7km south-west of Upington in the Dawid Kuiper Local Municipality, Northern Cape. Refer to the Locality Map at **Figure 1**.

This BID aims to:

- ✓ Provide a description of the project.
- ✓ Briefly describe the potential environmental impacts.
- ✓ Describe what the Basic Assessment process entails.
- ✓ Provide information on how you can participate.

PROJECT DESCRIPTION

The proposed sand mining is in the form of a simple process that only includes loading and hauling of river sand from the Unnamed Tributary. The depth of the excavations in the river bed will be on average 1.5 metres deep and the total mining footprint 5 hectares. The duration required for the sand mining is an initial 2 years with the 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.

Refer to the Proposed Site Plan included as **Figure 2**.

Construction Phase:

- Access and service roads: Access to the mine works will be via the R359 and existing farm tracks, which will be used as haul roads and no new road 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. Limited waste management facilities will be supplied. A temporary storage area for used lubrication products and other hazardous chemicals needs to be provided for the collection of the small volume of waste before it is removed to the company headquarters.

- Maintenance Oil/grease/diesel management systems will consist of drip trays for stationary equipment to be provided in the parking area outside the drainage channel.

Operational Phase

- The operation phase will only involve the loading and hauling of raw river sand. Only one Front End Loader (FEL) will be used for loading and hauling and no processing will take place. The only surface disturbance except for the mining excavation within the drainage channel will be a small stockpile to be placed in the laydown area as mining progresses.
- The depth of the mining operations will be on average 1.5 metres as only the top layer of sand is mined. The total mining footprint is 5ha. Backfilling is not an option as the sand is completely removed and replaced overtime as it is washed in from upstream.
- No industrial or mine waste is generated during the mining process.
- No processing will take place except for limited stockpiling and no mining waste or overburden or Fine Residue Dumps (FRD) will be created.

Decommissioning and Closure Phase

- Planning for closure and restoration from the beginning of an operation makes the process more efficient, as waste can be removed as it is generated.
- Excavations can be planned so that topography restoration is less complicated, and topsoil can be re-used at shorter intervals.
- The decommissioning and closure phase at the end of the life of the mine will consist of implementing the Rehabilitation, Decommissioning and Closure Plan, included as an Appendix to the DBAR.



Figure 1: Locality Plan showing location of the Proposed Sand Mining Permit Application

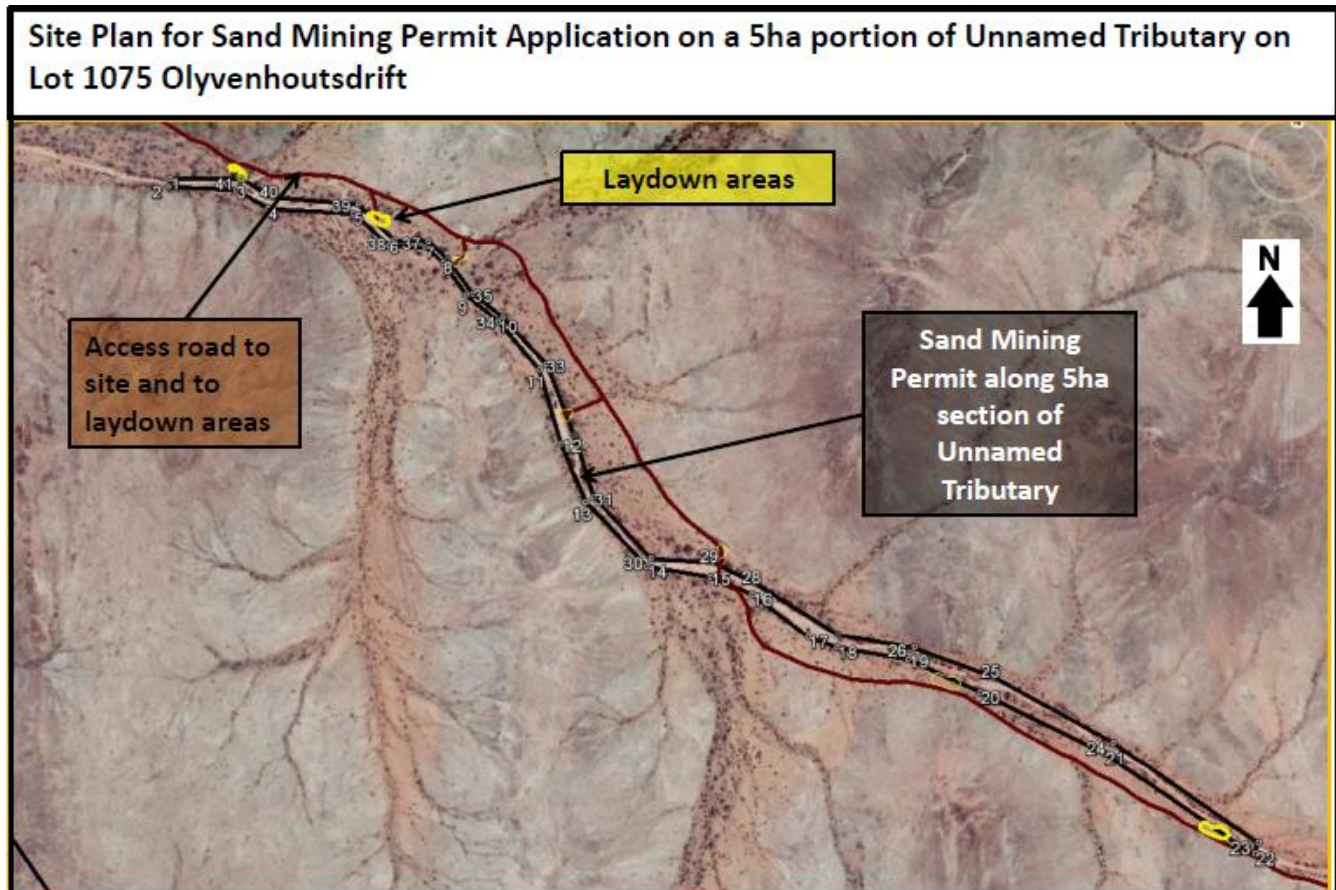


Figure 2: Site Plan for the Proposed Sand Mining site with Access Roads and Laydown Area

ALTERNATIVES

It is a requirement of NEMA that feasible and reasonable alternatives are considered, including the “No Go” option. The layout and technology of the proposed sand mining project has been determined by the shape, position and orientation of the mineral resource (river sand) to be mined, as shown in Figure 2 above.

There are no reasonable or feasible: location; activity; site layout; technology; or, operational alternatives due to the basic mining methods that are applicable to sand mining.

POTENTIAL ENVIRONMENTAL IMPACTS

The following **potential environmental impacts** have been identified and assessed in the Draft BAR:

- Soil compaction from repeated use of access tracks.
- Noise caused by the machinery and vehicles on site, and by vehicles going to and from the mining site.
- Visibility of the sand mining operations.
- Dust emissions from general site activities.
- Removal of sand from river bed impacting on the Unnamed Tributary, which is not classified as a Freshwater Ecosystem Priority Area (FEPA).
- The western portion of the site is classified as a CBA2 (Critical Biodiversity Area) and a small section of the middle portion as an Ecological Support Area (ESA), with the remaining section not zoned for conservation significance. Refer to the relevant Figure in the DBAR.
- Wildlife and vegetation disturbance from front end loader and trucks.
- Impact of stormwater run-off during infrequent rainfall events.
- River sand contamination from hydrocarbon spills.
- Removal of alien invasive plant species such as *Prosopis* sp. (positive impact).
- Socio-economic impact on job security, employment creation and economic spin-offs (positive impact).

THE BASIC ASSESSMENT PROCESS

Sections 24 and 44 of the National Environmental Management Act (Act No. 107 of 1998) (NEMA) make provision for the promulgation of regulations that identify activities which may not commence without an Environmental Authorisation (EA) issued by the competent authority, in this case, the Department: Mineral Resources (DMR).

The EIA Regulations, 2014 (Government Notice (GN) R982, which came into effect on 8 December 2014), as amended by GNR 327 (dated 7 April 2017), promulgated in terms of NEMA, govern the process, methodologies and requirements for the undertaking of EIAs in support of EA applications. The EIA Regulations are accompanied by Listing Notices (LN) 1-3 that list activities that require EA. The EIA Regulations, 2014 as amended, sets out two alternative authorisation processes. Depending on the type of activity that is proposed, either a Basic Assessment (BA) process or a Scoping and Environmental Impact Reporting (S&EIR - also referred to as an EIA) process is required to obtain EA.

LN 1 and LN3 list activities that require a BA process, while LN 2 lists activities that require S&EIR.

The proposed project triggers activities identified in terms of LN1 of the EIA Regulations, 2014 as amended by GNR 327 (dated 7 April 2017), thus requiring a BA process:

- ✓ **Activity 21:** Any activity including the operation of that activity which requires a mining permit in terms of section 27 of MRPDA, including - associated infrastructure, structures and earthworks, directly related to the extraction of a mineral resource; or the primary processing of a mineral resource including winning, extraction, classifying, concentrating, crushing, screening or washing.
- ✓ **Activity 22:** The decommissioning of any activity requiring – a closure certificate in terms of section 43 of the MRPA.
- ✓ **Activity 27:** The clearance of an area of 1 hectare or more, but less than 20 hectares of indigenous vegetation.
- ✓ **Activity 28:** Commercial or industrial developments where such land was used for agriculture on or after 01 April 1998 and where such development: (ii) will occur outside an urban area, where the total land to be developed is bigger than 1 hectare.

Before commencing with the project, the proponent is required to appoint an independent Environmental Assessment Practitioner (EAP) to undertake a BA process and to obtain authorisation in terms of NEMA from the competent authority (DMR). Green Direction Sustainability Consulting (Pty) Ltd has been appointed as the EAP.

In addition to EA, a **Water Use General Authorisation** is required to be lodged with the Department of Water Affairs and Sanitation (DWS), as the applicable Water Use activities listed in the National Water Act (Act No. 36 of 1998) are:

- **Section 21(c)** related to impeding or diverting the flow of water in a watercourse, and
- **Section 21(i)** related to altering the bed, banks, course or characteristics of a watercourse.

An application for a General Authorisation in terms of GN 509 of 2016 for Section 21(c) and (i) is to be submitted to DWS.

The BA Process:

- ✓ Submission of the Application Form to DMR.
- ✓ Preparation of the Background Information Document (BID); registered letters & BID to adjacent landowners; and Project Notice with BID to Organs of State.
- ✓ Preparation of the Draft Basic Assessment Report (DBAR), Environmental Management Programme Report (EMPr), and Closure Report.
- ✓ The availability of these reports will be advertised for the 30 day comment period, with a copy placed in the nearest library. Site notices will be placed, and a copy of the reports will be made available on the EAP's website (www.greendirection.co.za). The public consultation undertaken will be recorded in the Final BA, which will be submitted to DMR for consideration.

Refer to **Figure 3** for the Basic Assessment process flow diagram.

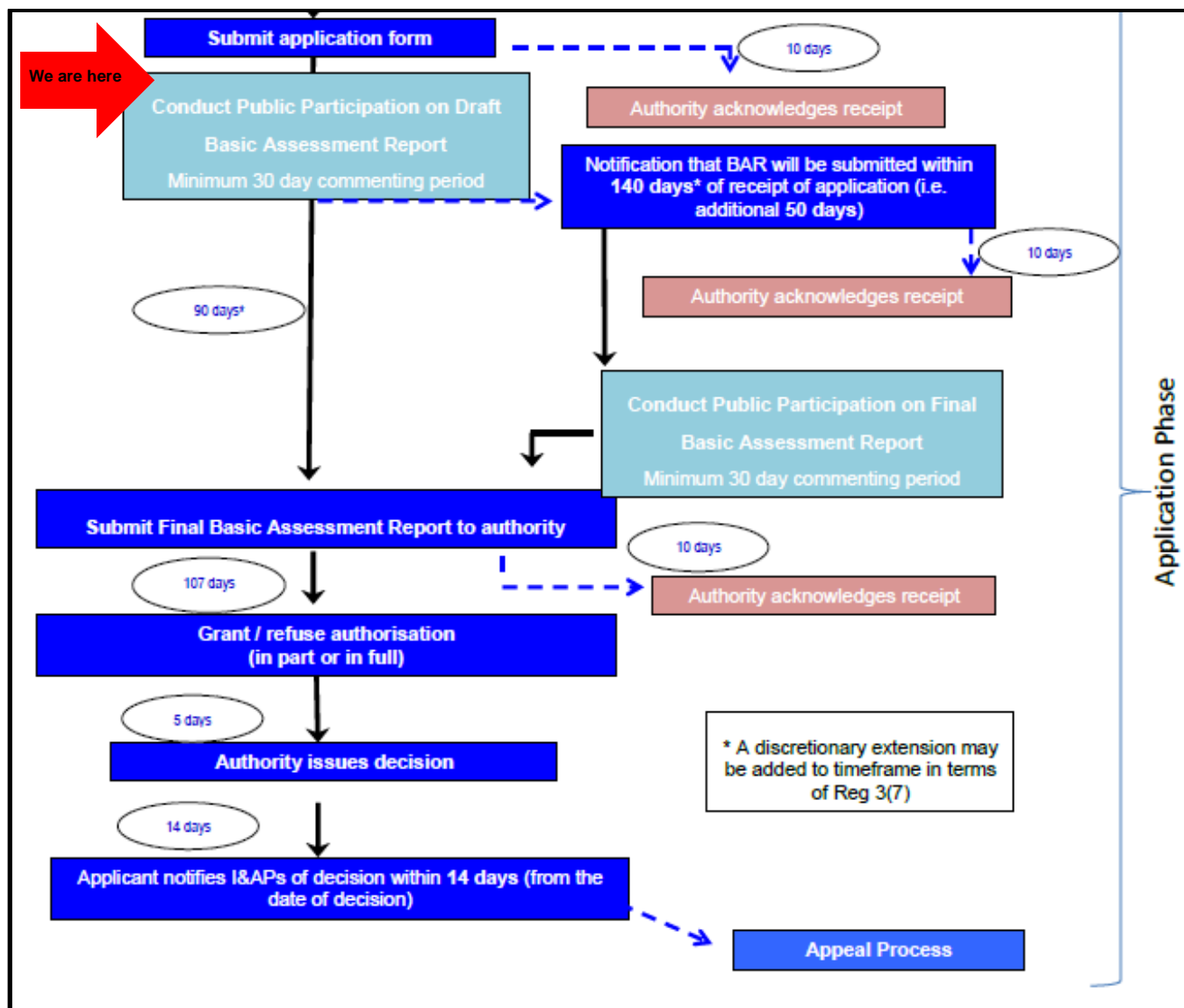


Figure 3: Process Flow Diagram for a Basic Assessment Process

HOW CAN YOU PARTICIPATE?

If you or your organisation would like to be involved in the BA process please submit your contact details for registration as an Interested & Affected Party (I&AP) on our database and submit your written comments on the attached form, by **9th July 2018** as per the details below. Only registered I&APs will continue to be informed about the BA process.

REGISTER OR PROVIDE YOUR WRITTEN COMMENT TO:

Green Direction Sustainability Consulting (Pty) Ltd
 Postnet Somerset Mall; Suite 922; Private Bag X15; Somerset West; 7130
 Email: jenny@greendirection.co.za

The Reports are available on www.greendirection.co.za/documents

The 30 day comment period is from 8th June 2018 to 9th July 2018.

Please refer to the above DMR reference number in your submission, and provide your name, contact details, preferred method of notification (e.g. email) and indication of any direct business, financial, personal or other interest in the application.

REGISTRATION & COMMENT FORM

**PROPOSED SAND MINING PERMIT APPLICATION: SECTION OF UNNAMED TRIBUTARY ON
LOT 1075 OLYVENHOUTSDRIFT SETTLEMENT, DAWID KRUIPER LOCAL
MUNICIPALITY**

DMR REF.: NCS 30/5/1/1/2/1 (10678)MP

PLEASE REGISTER MY CONTACT DETAILS ON THE DATABASE FOR FURTHER CORRESPONDENCE

YES

NO

DATE:

NAME:

ORGANISATION:

POSTAL ADDRESS:

EMAIL:

TELEPHONE NO.:

FAX. NO.:

COMMENTS

**INDICATION OF ANY DIRECT BUSINESS, FINANCIAL, PERSONAL OR OTHER INTEREST IN THE
APPLICATION**

SEND YOUR COMMENTS BY VIA EMAIL OR POST – Deadline is 9th July 2018

jenny@greendirection.co.za

Postnet Somerset Mall; Melcksloot Village; Suite 922; P/Bag X15;
Somerset West; 7130