

**Appendix 2: Final Rehabilitation, decommissioning and mine
closure plan
Including Environmental Risk Assessment**

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Portion 14 Farm Mesklip No 259**

Reference NC30/5/1/3/2/10815MP

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1 INTRODUCTION

This document serves to comply with regulation 6 of the NEMA Financial Regulations (2015) that states that an applicant must determine the financial provision through a detailed itemisation of all activities and costs, calculated based on the actual costs of implementation of the measures required for—

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

1.1 The annual rehabilitation plan

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

The objective of the annual rehabilitation plan is to—

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

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

1.2 Final rehabilitation, decommissioning and mine closure plan

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

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

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

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

1.3 Environmental risk assessment report

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

The objective of the environmental risk assessment report is to—

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

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

1.4 Issues that have guided the development of the plan

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

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

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

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

Each goal is supported by a suite of key objectives and activities which are elaborated on in section 3 of this report. This report also describes how these objectives are planned to be met and elaborate on the implementation of certain risk mitigation actions (section 5). With risk assessment and mitigation being integral to the planning and executing of the rehabilitation and closure of the mine. Aftercare and maintenance of rehabilitated sites is often the difference between the ultimate successes or failure of rehabilitation and monitoring of rehabilitation will determine whether rehabilitation objectives and requirements are being achieved.

This report fulfils the requirements of both the Final Rehabilitation, Decommissioning and Mine Closure Plan and the Environmental Risk Assessment Report required in terms of the NEMA (Act 107 of 1998) regulations and applicable MPRDA (Act No. 28 of 2002) regulations.

Several pieces of legislation are applicable to mine closure. Importantly, public participation is an integral part of mine closure and the process followed needs to fulfil the requirements of all relevant legislation. The following government departments have been identified amongst others as playing a key role in the closure process:

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

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

2 CONTEXT OF THE MINING OPERATION

2.1 Mining Permit

The mining area is situated over portion 14 of the Farm Mesklip 259. The operation is carried out under cover of Mining permit File reference NC30/5/1/3/2/10815MP. The operation is situated in the Namakwa District Municipality and Nama Khoi local authority of Namaqualand administrative district of the Northern Cape.

Portion 14 of the Farm Mesklip 259 is registered in the name of the Rooiwal Communal Property Association by virtue of deed T62507/2015. The area is situated of the N7 main road 40Km south of Springbok with an approximate locality Latitude S29.96158° and Longitude E17.91129°.

2.2 Project Description

Mining will be in the form of a simple process that only include loading and hauling of river sand from a sand quarry.

2.2.1 Mine design map

The N7 Main Road runs past the mining operation and provide excellent access to the mining operation. The turn-off from the N7 to the mine is 40 km to the south of Springbok.

No water or electricity is used in the mining operation. No permanent infrastructure is present on. Existing farm tracks are used as haul roads and no new roads were developed.

Refer section 6 for mine layout and quantification of closure elements.

2.2.2 Project layout

Construction Phase

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. No buildings and infrastructure will be required as the operation will be run from the company headquarters were all logistics will be available.

Development of infrastructure and logistics

- Access and service roads
Access to the mine workings is via the N7 main road and existing farm tracks. The existing farm tracks will be used as haul roads and will only be upgraded to facilitate haul trucks.
- Water supply
No process water is used in the mining process.
- Electrical supply
No electricity is used on the mining area.
- Logistics
No infrastructure will be required due to the simple mining method and only limited waste management facilities will be supplied consisting of the following:
 - Domestic waste is 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 consist of the following:
 - Service Bay/Parking area with drip trays for stationary equipment to be provided outside the drainage channel.

Operational Phase

This operation will only involve the loading and hauling of raw river sand. Only one front end loader 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.

The depth of the mining operations will be less than 2m as only the top layer of sand is mined. The total area under excavation will approximately be 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 a depth of 2m and sold as a FoT product. No processing is taking place except for limited stockpiling so no mining waste or overburden and 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.

Decommissioning and closure 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-use 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 this final rehabilitation, decommissioning and closure plan.

3 REGULATORY REQUIREMENTS

3.1 Environmental Authorisation (EMPr) requirements

The key closure objective described in the closure plan submitted as part of the EMP is to leave the site in as safe and self-sustaining a condition as possible and in a situation where no post-closure intervention is required to ensure that the rehabilitation measures prove successful. The aim is to ensure a stable environment that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof. This will be achieved by leaving the drainage channel even, and in a natural state containing no foreign debris or other materials. All scrap and other foreign materials will be removed from the area and disposed of as in the case of other refuse, whether these accrue directly from the mining operation or are brought on to the site. The access points to the drainage channel will be backfilled with the original material removed and profiled to blend in with the topography of the surrounding environment.

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

4 FINAL DECOMMISSIONING AND CLOSURE OF MINING OPERATION

Concurrent rehabilitation and remediation are provided for in the annual rehabilitation plan and contain information that defines activities on an annual basis and how these relate to the Final closure vision, as detailed in this final rehabilitation, decommissioning and mine closure plan. Annual reviews in terms of regulations 6(a) and 11(1)(a) of the NEMA Financial Regulations, that form part of the Annual Environmental Audit, assesses what closure objectives and criteria are being achieved through the implementation of the plan.

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

4.1 Risk sources

The risks sources and associated risks are listed below and the impact rating and mitigation actions of each risk is addressed in the risk assessment.

The risks associated with safety is deep and unstable excavations that can be detrimental to the safety and health of humans and animals. The risk 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 include loading and hauling no unsafe areas like steep slopes that needs demarcation to prevent access by humans and animals will be created on site. 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.

Another risk is the destruction of vegetation on the banks that will lead to scouring. The risk will be mitigated by shaping of the bank of the drainage channel and preventing destruction of vegetation on the banks to prevent scouring and restricting the depth of the excavations to less than 1.5m.

Another potential risk arising from the mining area 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.

Actions to mitigate the risk of erosion and scouring is to ensure stability of the bank of the drainage channel by re-shaping and backfilling of the access point with suitable material where required.

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 are only limited product stockpiles present on site.

There will also be a risk with regard to waste management practices leaving legacies and will require implementing of mitigation and management actions to limit the residual impact after mine closure.

4.2 Basic rehabilitation methodology

- Objective 1 - To create a safe and healthy post-mining environment.
 - Safe mining area (no potentially dangerous areas like deep excavations or securely fenced off)
 - Limit the depth of the excavation to a maximum of 2m deep.
 - Maintaining the affected environment in a stable condition that will not be detrimental to the safety and health of humans and animals.
 - Reinststate original profile of the riverbank by back filling of access point with the original material excavated.
 - Promote re-vegetation of bank with natural riparian vegetation.
 - Minimise risk of erosion from either increased base flow or mining operations followed by prompt rehabilitation and maintenance of erosion events.
 - Limited residual environmental impact (No surface and/or groundwater contamination, waste management practices not creating or leaving legacies with a landscape that reduces the requirement for long term monitoring and management)
 - No waste in the form of dumps or structures will remain on surface after mine closure
 - No development of infrastructure and services will take place and facilities at the company headquarters will be used.

- Unwanted steel, sheet metal and equipment need to be removed from the mining area on a daily basis and no salvage yard will be established.
- No temporary storage area for used lubrication products and other hazardous chemicals will be developed and waste must be disposed of at a collection point at the company headquarters on a daily basis.
- Existing farm roads must be used for mining operations and where not possible the new roads or will be kept to a minimum.
- Provision must also be made for efficient storm water control to prevent erosion of roadways.
- Equipment used in the mining process will be adequately maintained in the workshops available at the company headquarters so that during operations it does not spill oil, diesel, fuel, or hydraulic fluid.
- Accidental petro-chemical spills if any must be cleaned up immediately by removing the spillage together with the polluted soil and by disposing of them at the soil farm of the company HQ.
- Objective 2 - To create a stable, free draining post mining landform, which is compatible with the surrounding landscape and which is capable of a productive land use that achieves a land capability equal to that of pre-mining conditions
 - Preventing attenuating or diverting any of the natural flow.
 - Remove sand to the demarcated stockpile area with no stockpiling within the drainage channel
 - Maintaining river-bank stability to be able to withstand high flow conditions.
 - Prevent canalisation of the flow that can lead to scouring or erosion.
 - Levelling of the river bed to prevent impeding and damming upstream.
 - Topsoil must be removed from virgin areas to be disturbed and vegetation cleared, keeping disturbance to the native vegetation to an absolute minimum.
 - Any topsoil removed from roads and stockpile area must be stored separately for later reuse.
 - Topsoil borrowing from the virgin areas to cover disturbed areas will not take place.
 - All topsoil which is removed prior to any activity will be stockpiled in berms (no higher than 2m) along with its resident seed bank and vegetation cover to an area above the proposed development.
 - This berm will then serve a storm water control function in the unlikely event of surface water run-off.
 - Movement of vehicles will be restricted to demarcated areas so as to keep the footprint of the mining operation to the absolute minimum.
 - Movement of equipment must be restricted to existing roads and no ad hoc driving or turning outside demarcated loading and hauling areas will be allowed.
 - All equipment and other items used during the mining operation needs to be removed from the site at final closure.
 - All compacted areas due to stockpiling, loading and hauling will be ripped with erosion control measures.
 - All stockpiles and leftover product must be removed or used to backfill the excavations
 - Minimise the loss of land with agricultural potential: minimize footprint of disturbances to facilitate recovery of degrading patches into active patches through colonization of the patch by dispersing species (patch dynamics)
 - Minimising footprint of disturbed areas including stockpile platforms and loading and hauling areas.

- Minimise loss of vegetation within the disturbance footprint: scarifying of all compacted areas as soon as possible for natural plant succession.
- Minimise disturbance of ecology due to loss of habitat and noise/visual/dust
- Objective 3 – To provide optimal post-mining social opportunities
 - Optimised benefits for the social environment
 - Maintain positive and transparent relationships with stakeholders and maintaining communication channels.
 - Provide stakeholders including government authorities with relevant information as per legislative requirements.
 - Undertaking environmental management in accordance with the approved EMP and Closure Plan.
 - Minimise noise disturbance: limiting earth moving to day time.
 - Management of air emissions to minimise nuisance effects or health risk; implementation and maintenance of dust monitoring programs accompanied by dust suppression activities by spraying water and/or dust-allaying agents.
 - Prevent long term changes in land use: revert back to grazing land where possible.
 - Minimal negative aesthetic impact
 - Minimise visual disturbance: implementation of mitigating measures from the public road views.
 - Waste material of any description, including receptacles, scrap, rubble and tyres, must be removed entirely from the mining area and disposed of at a recognised landfill facility. It will not be buried or burned on the site.

4.3 Aftercare and Maintenance

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

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

The main closure objective is to hand back the rehabilitated properties to the respective landowners in a state that is fit for grazing, as close as possible to the original carrying capacity and to ensure that the affected environment is maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof. The rehabilitation strategy is based on reinstating the original profile of the landscape and prepare the area for natural re-vegetation. The aim therefore is to leave the site in as safe and self-sustaining a condition as possible and in a situation where no post-closure intervention is required. Due to the specific nature of the mining operation no aftercare and maintenance were identified except for monitoring of erosion event over a period of 2 years.

5 RISK ASSESSMENT

5.1 Risk impact rating

Following risk identification (section 4), the impact of each risk was evaluated. One way of evaluating the impact of a risk is to determine the probability, severity, frequency and duration of the risk. These are all valuated separately and then combined to produce a risk impact;

insignificant (1, green), medium (2, yellow) or significant (3, red). In some instances, the impact of a risk was classified as uncertain due to lack of information.

For a risk with a rating of 3 (i.e. significant), strategies are put in place to reduce the risk to 1 (insignificant) or 2 (medium, provided that the risk can be controlled with management actions). To maintain the rating at 1 or 2, monitoring is implemented for a period of time to enable the confirmation of the risk as insignificant or as medium and under control.

Each risk is furthermore assessed for, decommissioning conditions (DC), and post-mining conditions (PM). Where a risk is only applicable to decommissioning (DC) related activities, a rating for the post-mining period is not provided. At the time of final mine closure an application will be made to DMR for a mine closure certificate only when all risks have been confirmed as insignificant or medium and under control via management actions.

5.2 Risk Mitigation and Closure objectives

Internationally, there seem to be three schools of thought:

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

The thought process for the closure of this operation is based on the last two. In addition to the goals and objectives for final decommissioning and mine closure the vision for the post closure land form is to leave the site in as safe and self-sustaining a condition as possible and in a situation where no post-closure intervention is required. The vision is to ensure that the affected environment is maintained in a stable condition that will not be detrimental to the safety and health of humans and animals and that will not pollute the environment or lead to the degradation thereof and that the aesthetic value of the area will be reinstated.

For the vision to be realised the objectives and associated risk management strategies and mitigating measures described in section 4 needs to implemented, monitored and evaluated.

The aim with risk mitigation actions is to over time manage significant (red) and medium (yellow) risks to become insignificant (green), or at least medium and under control with management actions. Once achieved, a risk will continue to be monitored to confirm its insignificance rating of green (1) medium and controlled rating of yellow (2) as part of aftercare and maintenance.

The closure process involves a series of actions, executed over a number of years as indicated in the annual rehabilitation plans, with continual monitoring, review and remedial actions (if required). Identified and assessed risks feed into mitigation actions (or primary tasks) of which successful implementation result in achievement of the mine closure goals and objectives.

Financial provision is made in section 6 to deal with these mitigating measures in case of temporary closure or sudden closure during the normal operation of the project or at final planned closure.

The identified risks and their levels are listed together with their associated mitigating actions in Table 1.

Table 1: Risks, risk levels and mitigating actions

Risk	Risk Rating	Mitigation Actions
Scouring of bank of drainage channel due to flood events	DC	Limit the depth of the excavation to a maximum of 1.5m deep - Prevent canalisation of the flow that can lead to scouring or erosion.
	PM	Reinstate original profile of the riverbank by back filling of access point with the original material excavated. Prompt rehabilitation and maintenance of erosion after food events. Limiting and controlling access while rehabilitation activities are in progress
Higher erodibility of bank of drainage channel or profiled access points resulting in erosion	DC	Promote re-vegetation of bank with natural riparian vegetation. Maintaining river-bank stability to be able to withstand high flow conditions. Installation of
	PM	conservative run-off and land-use plan. Create a rough surface to act as contours and prevent trampling due to agricultural activities.
Uncontrolled access to a potentially unsafe area	DC	Levelling of the river bed to prevent impeding and damming upstream.
	PM	Eliminate unsafe areas in the post-mining area as far as possible by reinstating original profile of the riverbank. Limiting and controlling access while rehabilitation activities are in progress
Oil, fuel and lubricant spills during demolition activities	DC	Cleaning as per current approved procedure.
	PM-NA	Disposal of contaminated soil at soil farm at company HQ.
Post-mining surface water quantities are more/less than pre-mining or changed flow patterns.	DC	Preventing attenuating or diverting any of the natural flow.
	PM	Monitoring through observations and regular inspections. Implementing final topography changes if required
Incomplete removal of waste	DC	Final walk through of complete mining area to ensure no mining related waste remaining on site.
	PM	
Waste classes not kept in separate streams	DC	Communication and training on the importance of separating waste streams
	PM	
Farming not viable on rehabilitated areas	DC	Shaping of slopes at access points and any remaining excavations and creating micro habitats for seed collection with a higher moisture holding capacity suitable to withstand dry year conditions and limit sandblasting of seedlings.
	PM	This will be followed by monitoring of erosion and re-vegetation and comparison thereof against that of the virgin landscape adjacent to the mined area. Mitigating steps against accelerated erosion and unsuccessful plant succession through patch dynamics if proven necessary.
Yields (restoration) are compromised through improper farming practices	DC	Adherence to the recommended stocking rates for small stock units. Provide for reduced carrying capacity during restoration process.
	PM	Mitigating steps against accelerated erosion and slow plant recovery if proven necessary by fencing and exclusion of areas from grazing.

Compaction of stockpile and loading platforms limiting agricultural potential	DC	Rip (30cm deep) and allow to re-seed naturally. Limiting access to rehabilitated areas
	PM	
Dust generation during demolition activities	DC	Maintenance of the existing complaints register Communication of dust, noise and increased traffic related activities to the affected community and the expected durations of these activities Continuation of current dust suppression activities
Noise generation during demolition activities	PM N/A	
Traffic during demolition activities		
Dust from farm roads and disturbed land	DC	Continuation of current dust suppression activities
	PM	

Documentation and monitoring results will be provided as objective evidence of achieving the objective as listed in Table 2. The criteria with the contents of these documents must comply with are also given in this table.

Table 2: Objective evidence and closure criteria

Closure objective	Document scope	Author	Success criteria (standard)
Slope stability	Inspection of the post-mining areas with the objective to identify unstable areas and formation of erosion gulley's	Independent EAP	Post-mining area declared stable by DMR mine health and safety
No negative effect on surface water flow and waste management practices do not leave/create legacies	Inspection of the post-mining surface area with the objective to identify erosion and scouring due to flood event and storm water and sheet flow	Independent EAP	Post-mining area declared stable by DMR
	Assessment of the completeness of removal of mine waste	Independent EAP	Final performance assessment report declares 100% removal of waste and equipment
Secured potentially Dangerous post-mining sites	Inspection of the post-mining surface area with the objective to identify unsafe areas	Independent EAP	Post-mining area declared safe by DMR
Viable Small stock production	Report on the monitoring results with regard to succession tempo of total cover in comparison with virgin vegetation adjacent to mining area	Independent EAP	Total cover and species composition are comparable to that of the adjacent virgin area
Sustainable production of grazing	Monitoring results of erosion on steep slopes (20% gradient) and disturbed areas	Independent EAP	At the time of closure, soil loss has stabilised over the whole previously disturbed area
Limited environmental impacts during demolition activities	Summary of all complaints received during demolition activities and follow up actions	Mine SHE Head, audited by independent EAP	Nuisance levels consistently on par with legislative standards after completion of demolition activities. All incidents older than 90 days investigated and feedback given to complainant

6 ESTIMATED COST FOR REQUIREMENTS TO FULLY DECOMMISSION THE SITE

According to regulation 6 of the NEMA Financial Regulations 2015 an applicant must determine the financial provision through a detailed itemisation of all activities and costs, calculated based on the actual costs of implementation of the measures required for— (a) annual rehabilitation, as reflected in an annual rehabilitation plan; (b) final rehabilitation, decommissioning and closure of the prospecting, exploration, mining or production operations at the end of the life of operations, as reflected in a final rehabilitation, decommissioning and mine closure plan; and (c) remediation of latent or residual environmental impacts which may become known in the future, including the pumping and treatment of polluted or extraneous water, as reflected in an environmental risk assessment report.

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

6.1 Assessment of financial provision

The assessment of the financial provision requirements for annual rehabilitation in terms reg. 6(a) is provided for as part of the annual rehabilitation plan that form part of the annual environmental audit. Financial provision in terms of reg. 6(c) are covered by the requirements for the actual costs of implementation of the measures required for final rehabilitation, decommissioning and closure of the mining operations at the end of the life of operations as reflected in this final rehabilitation, decommissioning and mine closure plan in terms of reg. 6(b). No remediation of latent or residual environmental impacts which may become known in the future were identified at this stage.

The following risk-based criteria and assumptions were used to calculate the final rehabilitation, decommissioning and closure cost:

- Return of land to its pre-mining land capability where possible
- All vehicles and equipment will be removed for salvage or resale
- A hazardous disposal site will not be constructed and all hazardous waste will be removed from site and transported to the company headquarters.
- Existing tracks will be used and new tracks must be restricted to the absolute minimum.
- All compacted areas due to hauling and stockpiling must be ripped to 300 mm
- The stockpile areas will not exceed the planned area footprint
- All disturbed and exposed surfaces will be covered with at least 150 mm of topsoil and re-vegetation must be allowed to take place naturally
- It is assumed that levelling of the river bed to prevent impeding and damming upstream will be addressed as part of the operation and necessary remedial actions implemented prior to closure
- The general approach adopted for the drainage channel is to prevent attenuating or diverting any of the natural flow and reinstating the original profile of the access points and ensuring the hydrological integrity of the area.
- Topography to follow the original landform shape.

6.2 Quantified Closure elements

Closure element	Size	Cost Factor
Reinstate original profile of the riverbank by back filling of access point with the original material excavated	1Ha	1
Promote re-vegetation of bank with natural riparian vegetation (ripping & levelling)	0.5Ha	2
Maintaining river-bank stability	Part of annual rehab plan	
Prompt rehabilitation and maintenance of erosion events		
Preventing attenuating or diverting any of the natural flow		
Prevent canalisation of the flow		
Levelling of the river bed to prevent impeding and damming upstream		
Area covered by normal surface disturbance roads (ripping & levelling)	1Ha	2
Compacted area - Stockpile and hauling area(ripping & levelling)	2.5Ha	2
Final clean-up	15Ha	3

6.3 Calculation of Closure cost

For each closure element, various possible combinations of required rehabilitation work were identified and costs were calculated for each of these, based on quotations obtained from independent third party suppliers for earthmoving equipment rental and various other consumables. Rates used are from the Contractors Plant Hire Association.

Equipment

Excavator Cat 336D R 776.77/h min 8hours + R2000.00 delivery & fuel = R8214.16/day

Grader Cat 140K R 1 000.00/h

Tipper Truck 15m³ R 500.00/h

B25 dumper Cat 740B R1400.00/h

Loader Cat 962H R 900.00/h

Manual labour R 24.34/h

• Cost factor 1 - Reinstate topography of access points

Profiling

Excavator Cat 336D R8214.16/day

Area covered 4ha/day

Total Cost per Ha R2053.54

• Cost factor 2 - Level and rip compacted areas

Ripping and levelling

Grader 140 K R1000.00/h

Grader Speed 4Km/h

Rip/Scraper width 3.5m

Area covered 1Ha/h

Total Cost per Ha R1000.00

• Cost factor 3 - Final clean-up

15m³ Tipper Truck R500.00/h

Transport of waste & scrap 3Hr/20Ha

Equipment Cost R75.00/Ha

Manual labour R24.34/h

Final clean-up of mining related waste 8Hr/20Ha

Labour Cost R 9.73/Ha

Total Cost per Ha R76.04

6.4 Total estimated cost for requirements to fully decommissioned the mining site at final closure

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

7 THE PUBLIC PARTICIPATION PROCESS

7.1 Principles and Objectives

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

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

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

- Play an oversight role in the monitoring and evaluation of mine closure. Play an oversight role in the monitoring and evaluation of mine closure.

7.2 Stakeholder Identification and Project Data Base

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

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

The process of involving stakeholders had three main objectives:

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

Stakeholders were drawn from the sectors outlined below:

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

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

8 WAY FORWARD

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

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